



May 6, 2013

Mary Jo Nawrocki  
Superintendent  
Assabet Valley Regional Vocational School  
215 Fitchburg Street  
Marlborough MA, 01752-1288

UPS Tracking #:  
1Z A54 67Y 02 9558 9500

RE: **Final Program Review Determination**  
OPE ID: 02169900  
PRCN: 2013-201-28179

Dear Superintendent Nawrocki:

The U.S. Department of Education's (Department's) School Participation Division – New York/Boston issued a program review report on March 25, 2013 covering Assabet Valley Regional Vocational School (Assabet Valley's) administration of programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2011-2012 award year. The institution's final response was received on April 16, 2013.

The School Participation Division – New York/Boston has reviewed Assabet Valley's responses to the Program Review Report. A copy of the program review report (and related attachments) and Assabet Valley's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by Assabet Valley upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

Assabet Valley's responses have resolved all findings. In addition Assabet Valley has provided assurances that the appropriate corrective actions have been taken to resolve and prevent future occurrences of all findings. Therefore, Assabet Valley may consider the program review closed with no further action required.

Program records relating to the period covered by this program review must be retained until the later of: the resolution of the loan(s), claim(s) or expenditure(s) questioned in the program review [34 C.F.R. § 668.24(e)(3)(i)] or the end of the retention period applicable to the record [34 C.F.R. § 668.24(e)(1) and (e)(2)].

If you have any questions please call Mark Malboeuf at (617) 289-0140.

**Federal Student Aid**  
An OFFICE of the U.S. DEPARTMENT of EDUCATION

John W. McCormack Fed Bldg., 5 Post Off Sq., 9<sup>th</sup> Floor, Suite 950-A  
Boston, MA 02109

Sincerely,

(b)(6); (b)(7)(C), (b)(7)(C)

Betty Coughlin  
Director

Enclosure: Program Review Report (with attachments)  
Assabet Valley's Response to the Program Review Report

cc: Melissa Couture, Financial Aid Administrator  
Patrick Collins, Assistant Superintendent  
National League for Nursing Accrediting Commission  
Massachusetts Board of Registration in Nursing



March 25, 2013

Mary Jo Nawrocki, Superintendent  
Assabet Valley Regional Technical School  
215 Fitchburg Street  
Marlborough, MA 01752-1288

Sent via UPS:  
1Z A54 67Y 02 9005 6335

RE: **Program Review Report**  
OPE ID: 02169900  
PRCN: 2013-201-28179

Dear Mrs. Nawrocki:

From February 11, 2013 through February 13, 2013, Mark Malboeuf and Cheryl Marotta as representatives of the U.S. Department of Education conducted a review of Assabet Valley Regional Technical School's (Assabet Valley) administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). 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 Assabet Valley. The response should include a brief, written narrative for each finding that clearly states Assabet Valley's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, Assabet Valley must provide supporting documentation as required in each finding.

Please note that pursuant to HEA section 498A(b), the Department is required to:

- (1) provide to the institution an adequate opportunity to review and respond to any preliminary program review report<sup>1</sup> and relevant materials related to the report before any final program review report is issued;
- (2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination –
  - a. A written statement addressing the institution's response;
  - b. A written statement of the basis for such report or determination; and
  - c. A copy of the institution's response.

The Department considers the institution's response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution's

<sup>1</sup> A "preliminary" program review report is the program review report. The Department's final program review report is the Final Program Review Determination (FPRD).

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5 Post Office Square - Suite 950-A Boston, MA 02109

written response will not be attached to the FPRD. However, it will be retained and available for inspection by Assabet Valley upon request. Copies of the program review report, the institution's response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after the FPRD is issued.

The institution's response should be sent directly to Mark Malboeuf of this office within 30 calendar days of receipt of this letter.

**Protection of Personally Identifiable Information (PII):**

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the findings in the attached report do not contain any student PII. Instead, each finding references students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Student Sample. The appendix was encrypted and sent separately to the institution via e-mail. Please see the enclosure Protection of Personally Identifiable Information for instructions regarding submission to the Department of required data/ documents containing PII.

**Record Retention:**

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

We would like to express our appreciation for the courtesy and cooperation extended during the review. 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 Mark Malboeuf at 617.289.0140 or [mark.malboeuf@ed.gov](mailto:mark.malboeuf@ed.gov).

Sincerely,

(b)(6); (b)(7)(C); (b)(7)(C)

Tracy M. Nave  
Compliance Manager

cc: Melissa Couture, Financial Aid Administrator  
Patrick Collins, Assistant Superintendent

Prepared for

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**Assabet Valley Regional Technical School**  
**OPE ID 02169900**  
**PRCN 2013-201-28179**

**Prepared by**  
**U.S. Department of Education**  
**Federal Student Aid**  
**School Participation Division – New York/Boston**

# Program Review Report

March 25, 2013

New York/Boston School Participation Division  
5 Post Office Square, 9<sup>th</sup> Floor, Suite 950-A, Boston, MA 02109-3921

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**A. Institutional Information**

Assabet Valley Regional Technical School  
215 Fitchburg Street  
Marlborough, MA 01752-1288

Type: Public

Highest Level of Offering: Non-Degree 1 year program

Accrediting Agency: National League for Nursing Accreditation Commission

Current Student Enrollment: 44 (2012-2013)

% of Students Receiving Title IV: 77% (2012-2013)

Title IV Participation: PC Net Funding Data Summary

	2011-2012
Federal Pell	\$83,847
Federal Direct Loans	\$294,513
Total disbursed:	\$378,360

<i>Default Rate FFEL/DL:</i>	2010	8.9%
	2009	9.5%
	2008	6.9%

## **B. Scope of Review**

The U.S. Department of Education (the Department) conducted a program review at Assabet Valley Regional Technical School (Assabet Valley) from February 11, 2013 to February 13, 2013. The review was conducted by Mark Malboeuf and Cheryl Marotta.

The focus of the review was to determine Assabet Valley's compliance with the statutes and federal regulations as they pertain to the institution's administration of Title IV programs. The review consisted of, but was not limited to, an examination of Assabet Valley's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and consumer information requirements.

A sample of 15 files was identified for review from the 2011-2012 award year. The student files were selected randomly from the list of students who 1) withdrew or ceased attendance for any reason other than graduation; 2) were selected for verification; and 3) received all non-passing grades ("0" GPA) for any term within the award year being reviewed. Appendix A identifies the students whose files were examined during the program review.

### **Disclaimer:**

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning Assabet Valley'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 Assabet Valley of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

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 Assabet Valley to bring operations of the financial aid programs into compliance with the statutes and regulations.

### **Finding #1: Failure to conduct exit counseling**

**Citation:** A school must ensure that exit counseling is conducted with each Direct Subsidized Loan or Direct Unsubsidized Loan borrower and graduate or professional student Direct PLUS Loan borrower shortly before the student borrower ceases at least half-time study at the school.

(2) The exit counseling must be in person, by audiovisual presentation, or by interactive electronic means. In each case, the school must ensure that an individual with expertise in the Title IV programs is reasonably available shortly after the counseling to answer the student borrower's questions. As an alternative, in the case of a student borrower enrolled in a correspondence program or a study-abroad program approved for credit at the home institution, the student borrower may be provided with written counseling materials within 30 days after the student borrower completes the program.

(3) If a student borrower withdraws from school without the school's prior knowledge or fails to complete the exit counseling as required, exit counseling must be provided either through interactive electronic means or by mailing written counseling materials to the student borrower at the student borrower's last known address within 30 days after the school learns that the student borrower has withdrawn from school or failed to complete the exit counseling as required.

(4) The exit counseling must—

(i) Inform the student borrower of the average anticipated monthly repayment amount based on the student borrower's indebtedness or on the average indebtedness of student borrowers who have obtained Direct Subsidized Loans and Direct Unsubsidized Loans, student borrowers who have obtained only Direct PLUS Loans, or student borrowers who have obtained Direct Subsidized, Direct Unsubsidized, and Direct PLUS Loans, depending on the types of loans the student borrower has obtained, for attendance at the same school or in the same program of study at the same school;

(ii) Review for the student borrower available repayment plan options including the standard repayment, extended repayment, graduated repayment, income contingent repayment plans, and income-based repayment plans, including a description of the different features of each plan and sample information showing the average anticipated monthly payments, and the difference in interest paid and total payments under each plan;

(iii) Explain to the borrower the options to prepay each loan, to pay each loan on a shorter schedule, and to change repayment plans;

(iv) Provide information on the effects of loan consolidation including, at a minimum—

(A) The effects of consolidation on total interest to be paid, fees to be paid, and length of repayment;

(B) The effects of consolidation on a borrower's underlying loan benefits, including grace periods, loan forgiveness, cancellation, and deferment opportunities;

(C) The options of the borrower to prepay the loan and to change repayment plans; and

- (D) That borrower benefit programs may vary among different lenders;
  - (v) Include debt-management strategies that are designed to facilitate repayment;
  - (vi) Explain to the student borrower how to contact the party servicing the student borrower's Direct Loans;
  - (vii) Meet the requirements described in paragraphs (a)(6)(i), (a)(6)(ii), and (a)(6)(iv) of this section;
  - (viii) Describe the likely consequences of default, including adverse credit reports, delinquent debt collection procedures under Federal law, and litigation;
  - (ix) Provide—
    - (A) A general description of the terms and conditions under which a borrower may obtain full or partial forgiveness or discharge of principal and interest, defer repayment of principal or interest, or be granted forbearance on a title IV loan; and
    - (B) A copy, either in print or by electronic means, of the information the Secretary makes available pursuant to section 485(d) of the HEA;
  - (x) Review for the student borrower information on the availability of the Department's Student Loan Ombudsman's office;
  - (xi) Inform the student borrower of the availability of Title IV loan information in the National Student Loan Data System (NSLDS) and how NSLDS can be used to obtain Title IV loan status information;
  - (xii) A general description of the types of tax benefits that may be available to borrowers; and
  - (xiii) Require the student borrower to provide current information concerning name, address, social security number, references, and driver's license number and State of issuance, as well as the student borrower's expected permanent address, the address of the student borrower's next of kin, and the name and address of the student borrower's expected employer (if known).
- (5) The school must ensure that the information required in paragraph (b)(4)(xiii) of this section is provided to the Secretary within 60 days after the student borrower provides the information.
- (6) If exit counseling is conducted through interactive electronic means, a school must take reasonable steps to ensure that each student borrower receives the counseling materials, and participates in and completes the exit counseling.

(7) The school must maintain documentation substantiating the school's compliance with this section for each student borrower.

*34 CFR § 685.304 (b)*

**Noncompliance:** Exit counseling was not completed for students 1, 2, 4 and 14.

**Required Action:** The review team noted that exit counseling was not conducted for students in the sample who had withdrawn or otherwise not completed the program. Exit counseling was conducted for all students in the sample who completed the program. Assabet Valley must review the files of all students who withdrew or failed to complete the program during the 2011-2012 award year. If exit counseling was not conducted, Assabet Valley must attempt to deliver to these students exit counseling materials either through electronic means or through mailing written materials to the student at the last known address that the institution has on file. In its response to this report, Assabet Valley must provide proof that exit counseling has been conducted for all students who withdrew or otherwise did not complete the program, or in the event that the student borrower cannot be reached, documentation that the institution has made a reasonable attempt to deliver exit counseling materials to the most recent address available to the institution.

#### **Finding #2: Disbursement Notifications**

**Citation:** If an institution credits a student's account with Direct Loan, FFEL, Federal Perkins Loan, or TEACH Grant Program funds, the institution must notify the student, or parent of the following:

- The anticipated date and amount of the disbursement;
- The student's or parent's right to cancel all or a portion of that loan or loan disbursement and have the loan proceeds returned to the holder of that loan; and
- The procedures and the time by which the student or the parent must notify the institution that he or she wishes to cancel the loan or loan disbursement.

The institution must provide the notice in writing no earlier than 30 days before, and no later than seven days after, crediting the student account at the institution, if the institution does not obtain affirmative confirmation from the student under paragraph (a)(6)(i) of this section.

*34 C.F.R. §668.165(a)(2) and (3)*

**Noncompliance:** Assabet Valley did not provide written disbursement notifications to any of the students in the sample.

It is Assabet Valley's current policy to verbally deliver the information concerning the date and amount of disbursement, right to cancel all or a portion of a loan, and procedures and timeframes

to cancel a loan to student borrowers when a student comes in to collect the loan proceeds.

**Required Action:** Assabet Valley must update its policies and procedures to include a written notification that informs student and parent borrowers of their disbursements and rights according to the regulations. Since Assabet Valley currently uses affirmative confirmation when awarding Title IV, the revised procedures must also stipulate the appropriate corresponding timeframe that the notice must be provided to students and parents. The updated policies and procedures must be submitted with the institution's response to this report.

#### **D. Recommendations**

The following is a recommendation based upon observations made by the review team during the program review. Assabet Valley is not required to provide a response to, nor is Assabet Valley required to act upon, this recommendation. However, the review team believes that adoption of this recommendation will assist Assabet Valley in its administration of Title IV, HEA program funds.

In the course of the review we noted an overall lack of experience in the financial aid office. This is largely attributed to Assabet Valley's reliance on its third party servicer. We recommend that Assabet Valley utilize some of the training tools made available by the Department to increase staff knowledge of the Title IV regulations. The following online training opportunities are available:

[www.ifap.ed.gov](http://www.ifap.ed.gov)  
<http://ifap.ed.gov/qahome/fsaassessment.html>  
<http://ifap.ed.gov/ifap/fsacoach.jsp>

We have also sent an invitation to the Director that will enable her to attend a session of the Department's Fundamentals of Federal Student Aid Administration training.

#### **E. Appendices**

Appendix A (Student Sample) contains personally identifiable information and will be emailed to Assabet Valley as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file(s) will be sent in a separate email.

# Assabet Valley Regional Vocational School District

215 Fitchburg Street  
Marlborough, Massachusetts 01752-1288

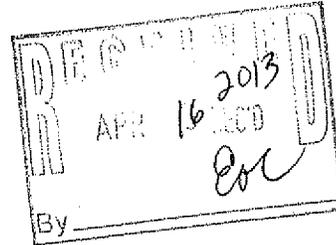
Mary Jo Nawrocki  
Superintendent - Director

Mark R. Hollick  
Principal

Patrick C. Collins  
Assistant Superintendent

April 10, 2013

Mark Malboeuf  
U.S. Department of Education  
Federal Student Aid  
School Participation Division – New York/Boston  
5 Post Office Square  
9<sup>th</sup> Floor, Suite 950-A  
Boston, MA 02109-3921



RE: Program Review Report  
OPE ID: 02169900  
PRCN: 2013-201-28179

Dear Mr. Malboeuf:

Assabet Valley Regional Technical High School is in receipt of your program review report dated March 25, 2013. Please accept this letter as our response to the findings in your report.

### **Finding #1: Failure to conduct exit counseling**

**Noncompliance:** Exit counseling was not completed for students 1, 2, 4 and 14

**Required Action:** The review team noted that exit counseling was not conducted for students in the sample who had withdrawn or otherwise not completed the program. Exit counseling was conducted for all students in the sample who completed the program. Assabet Valley must review the files of all students who withdrew or failed to complete the program during the 2011-2012 award year. If exit counseling was not conducted, Assabet Valley must attempt to deliver to these students exit counseling materials either through electronic means or through mailing written materials to the student at the last known address that the institution has on file. In its response to this report, Assabet Valley must provide proof that exit counseling has been conducted for all students who withdrew or otherwise did not complete the program, or in the event that the student borrower cannot be reached, documentation that the institution has made a reasonable attempt to deliver exit counseling materials to the most recent address available to the institution.

**District Response:** Assabet Valley has reviewed the files of all students who withdrew or failed to complete the program during the 2011-2012 award year. For the students that exit counseling was not conducted, Assabet Valley mailed exit counseling materials, via certified return receipt mail, to the students last known address. Please see attached letters.

Berlin, Hudson, Maynard, Marlborough,  
Northborough, Southborough, Westborough  
(508) 485-9430



*Equal Opportunity Institution*

Boylston, Clinton, Shrewsbury,  
West Boylston  
1-800-537-6663

From this point forward Assabet Valley will conduct personal exit counseling when possible. When withdrawn students are not willing to personally participate in exit counseling, Assabet Valley will send (certified return receipt) exit counseling materials.

**Finding #2: Disbursement Notifications**

**Noncompliance:** Assabet Valley did not provide written disbursement notifications to any of the students in the sample.

It is Assabet Valley's current policy to verbally deliver the information concerning the date and amount of disbursement, right to cancel all or a portion of a loan, and procedures and timeframes to cancel a loan to student borrowers when a student comes in to collect the loan proceeds.

**Required Action:** Assabet Valley must update its policies and procedures to include a written notification that informs student and parent borrowers of their disbursements and rights according to the regulations. Since Assabet Valley currently uses affirmative confirmation when awarding Title IV, the revised procedures must also stipulate the appropriate corresponding timeframe that the notice must be provided to students and parents. The updated policies and procedures must be submitted with the institution's response to this report.

**District Response:** Assabet Valley has updated its policies and procedures to include a written notification that informs student and parent borrowers of their disbursements and rights according to the regulations, and the appropriate corresponding timeframe that the notice must be provided to students and parents. Please see attached Disbursement Notification.

Thank you for your recommendations.

Sincerely,

(b)(6); (b)(7)(C); (b)(7)(C)

Mary Jo Nawrocki  
Superintendent-Director

cc: Patrick Collins, Assistant Superintendent  
Ellen Santos, Program Administrator  
Melissa Couture, Financial Aid Administrator