



August 20, 2014

Dr. Richard Carvajal
Bainbridge College
2500 East Shotwell
Bainbridge, GA 39819-8400

UPS Next Day Tracking Number:
1ZA879640297727071

RE: Final Program Review Determination
OPE ID: 011074-00
PRCN: 2012-4-04-27985

Dear President Carvajal:

The U.S. Department of Education's (Department's) Atlanta School Participation Division issued a program review report on August 23, 2012 covering Bainbridge College's (Bainbridge's) administration of programs authorized by Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 *et seq.* (Title IV, HEA programs), for the 2010-2011 and 2011-2012 award years. Bainbridge's final response was received on May 7, 2014. A copy of the program review report (and related attachments) and Bainbridge's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by Bainbridge 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.

Purpose:

Final determinations have been made concerning all of the outstanding findings of the program review report. The purpose of this letter is to: (1) identify liabilities resulting from the findings of this program review report, (2) provide instructions for payment of liabilities to the Department, (3) notify the institution of its right to appeal, and (4) close the review.

The total liabilities due from the institution from this program review are \$524,259. This FPRD contains detailed information about the liability determination for all findings.

Federal Student Aid
OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

**PROUD SPONSOR of
the AMERICAN MIND™**

Atlanta School Participation Division
61 Forsyth Street SW, Suite 18T40, Atlanta, GA 30303

www.StudentAid.gov

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. In addition, Appendix A also contains PII. The appendix is encrypted and will be sent separately to the institution upon request via e-mail.

Appeal Procedures:

This constitutes the Department's FPRD with respect to the liabilities identified from the August 23, 2012 program review report. If Bainbridge wishes to appeal to the Secretary for a review of financial liabilities established by the FPRD, the institution must file a written request for an administrative hearing. Please note that institutions may appeal financial liabilities only. The Department must receive the request no later than 45 days from the date Bainbridge receives this FPRD. An original and four copies of the information Bainbridge submits must be attached to the request. The request for an appeal must be sent to:

Ms. Mary E. Gust, Director
Administrative Actions and Appeals Service Group
U.S. Department of Education
Federal Student Aid/PC
830 First Street, NE - UCP3, Room 84F2
Washington, DC 20002-8019

Bainbridge's appeal request must:

- (1) indicate the findings, issues and facts being disputed;
- (2) state the institution's position, together with pertinent facts and reasons supporting its position;
- (3) include all documentation it believes the Department should consider in support of the appeal. An institution may provide detailed liability information from a complete file review to appeal a projected liability amount. Any documents relative to the appeal that include PII data must be redacted except the student's name and last four digits of his / her social security number (please see the attached document, "Protection of Personally Identifiable Information," for instructions on how to mail "hard copy" records containing PII); and
- (4) include a copy of the FPRD. The program review control number (PRCN) must also accompany the request for review.

If the appeal request is complete and timely, the Department will schedule an administrative hearing in accordance with § 487(b)(2) of the HEA, 20 U.S.C. § 1094(b)(2). The procedures

followed with respect to Bainbridge's appeal will be those provided in 34 C.F.R. Part 668, Subpart H. **Interest on the appealed liabilities shall continue to accrue at the applicable value of funds rate, as established by the United States Department of Treasury, or if the liabilities are for refunds, at the interest rate set forth in the loan promissory note(s).**

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)(1), (e)(2), and (e)(3).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact Toyoko Woodard at (404) 974-9448. Questions relating to any appeal of the FPRD should be directed to the address noted in the Appeal Procedures section of this letter.

Sincerely,

(b)(6)

Christopher Miller
Division Director

Enclosure:
Protection of Personally Identifiable Information
Program Review Report (and appendices)
Final Program Review Determination Report (and appendices)

cc: Connie Snyder, Financial Aid Administrator
Southern Association of Colleges and Schools
Georgia University System
Georgia Technical College System of Georgia

Prepared for

Bainbridge College

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

PROUD SPONSOR of
the AMERICAN MIND™

OPE ID: 011074-00
PRCN: 2012-4-04-27985

Prepared by: Toyoko Woodard
U.S. Department of Education
Federal Student Aid
Atlanta School Participation Division

Final Program Review Determination August 20, 2014

Table of Contents

A.	Institutional Information	3
B.	Scope of Review	4
C.	Findings and Final Determinations	4
D.	Summary of Liabilities	21
E.	Repayment Instructions	22
F.	Appendices	
	Appendix A: Student Samples	
	Appendix B: Program Review Report	
	Appendix C: Institution's Written Response	
	Appendix D: Cost of Funds Calculations	
	Appendix E: Estimated Actual Loss and Formula	
	Appendix F: Fedwire Form	
	Appendix G: Protection of Personally Identifiable Information	

A. Institutional Information

Dr. Richard Carvajal, President
Bainbridge College
2500 East Shotwell
Bainbridge, GA 39819

Type: Public

Highest Level of Offering: Two Year Associate Degree

Accrediting Agency: Southern Association of Colleges and Schools (SACS)

Current Student Enrollment: 3,664 (Spring 2012)

% of Students Receiving Title IV, HEA funds: 92% (2011-2012)

Title IV Participation Postsecondary Education Participants System (PEPS):

<u>Title IV Programs</u>	<u>2012-2013</u>
Federal Pell Grant Program (FPell)	\$10,490,242
Federal Direct Loan Program (FDL)	\$10,452,798
Federal Supplemental Educational Opportunity Grant (FSEOG)	\$ 186,170
Federal Work Study (FWS)	\$ 63,812

Default Rate FFEL/FDL: 2011 20.8%
2010 21.9%
2009 17.9%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Bainbridge College (Bainbridge) from July 16, 2012 to July 20, 2012. The review was conducted by Pamela Clemmer, Arva Thomas and Deion Thorpe.

Based upon an analysis of the Department's data, the Department determined that Bainbridge was not adequately monitoring satisfactory academic progress. A sample of 30 files with this characteristic was identified for review from the 2010-2011 and 2011-2012 (year to date) award years. In addition, four files were selected in order to review Bainbridge's administration of the FWS and FSEOG programs. Appendix A lists the names and social security numbers of the students whose files were examined during the program review. A program review report was issued on August 23, 2012.

Disclaimer:

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

C. Findings and Final Determinations

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

Resolved Findings

Findings 2, 4-6, 9, and 11-14

Bainbridge has taken the corrective actions necessary to resolve findings 2, 4-6, 9, and 11-14 of the program review report. Therefore, these findings may be considered closed. Findings requiring further action by Bainbridge are discussed below.

Findings with Final Determinations

The program review report findings requiring further action are summarized below. At the conclusion of each finding is a summary of Bainbridge's response to the finding, and the Department's final determination for that finding. A copy of the program review report issued on August 23, 2013 is attached as Appendix B.

Note: Any additional costs to the Department, including interest, special allowances, cost of funds, unearned administrative cost allowance, etc., are not included in individual findings, but instead are included in the summary of liabilities table in Section D of the report.

Finding 1: Satisfactory Academic Progress Not Monitored and Documented Adequately

Citation Summary:

34 C.F.R. § 668.16(e), Student Assistance General Provisions, states that for purposes of determining student eligibility for assistance under the Title IV, HEA programs, an institution establishes, publishes, and applies reasonable standards for measuring whether an otherwise eligible student is maintaining satisfactory academic progress in his or her educational program.

34 C.F.R. §§ 668.16(e)(D)(5) and (6), Student Assistance General Provisions, states that the institution must provide specific procedures under which a student may appeal a determination that the student is not making satisfactory progress and provide specific procedures for a student to re-establish that he or she is maintaining satisfactory progress.

34 C.F.R. § 668.16(f)(3), Student Assistance General Provisions, states that the institution must obtain and review documentation related to a student's eligibility for funds under the Title IV, HEA programs.

Noncompliance Summary:

Section 1: Ineligible Disbursements – Students Not Making Satisfactory Academic Progress (SAP)

The school was not following its written policy for the 2010-2011 award year and students who were not meeting the requirements were disbursed Title IV aid for semesters in which they were ineligible. Appeals were not always documented and decisions made by the Appeal Committee were often overruled by the administration. In several cases, Banner and the student account ledger did not accurately reflect the correct SAP decisions. The reviewers were told that the attempted hours in Banner were not necessarily correct.

For the 2010-2011 award year, the school's SAP policy states the following:

- *Student evaluated at the end of each semester.*
- *Qualitative measure is 2.0 GPA, including credit hours, learning support (remedial), and transfer hours.*
- *Quantitative measure is 67% of hours attempted, including grades of A, B, C, D, IP, and S. If not completed aid is suspended.*
- *Timeframe is 150% -- includes all attempts even if student changes major (however, school is excluding learning support).*
- *If student is not meeting the requirements of SAP, the student is placed on probation for one semester. The exception is when a student fails all courses. In that case, the student is placed on financial aid suspension.*
- *At end of probation, if a student has a cumulative 2.0 GPA and a cumulative 67% earned hours, the student is returned to good standing; or if at the end of probation the student has a 2.0 semester GPA and a 67% semester earned hours, the student is placed on probation 2.*
- *At end of probation 2, if the student is not meeting either GPA or earned hours, the student is suspended from financial aid.*
- *Appeals – Mitigating circumstances (health, death of family member, undue hardship, excluding pregnancy unless unforeseen complications), supporting documentation, and action taken to change circumstances. All decisions of the Appeals Committee are final.*

2010-2011 SAP Policy

Student 1

At the end of the spring 2010 term, the student had earned 59 hours and attempted 97 hours (excluding learning support) for a percentage of 61%. The student should have been placed on probation for the summer 2010 term, but was not. The student met the requirements of a semester 2.0 GPA and a semester 67% earned for the summer 2010 term, and the student should have been placed on probation 2 for the fall 2010 semester, but was still in good standing instead. At the end of the fall 2010 term, the student did not meet the SAP requirements and should have been suspended from financial aid from spring 2011 forward. The student continued to receive aid through spring 2012.

The student received \$1,788 in subsidized Direct Loan funds and \$3,669 in Federal Pell Grant funds for spring and summer 2011.

The student received \$5,550 in Federal Pell Grant funds, \$4,500 in subsidized Direct Loan funds, and \$6,000 in unsubsidized Direct Loan funds for the 2011-2012 award year.

Student 16

The student failed to meet SAP requirements since the fall 2009 semester. The student's GPA for fall 2009 was 1.0, spring 2010 was .20, summer 2010 was .20, fall 2010 was .20, spring 2011 was .20, and spring 2012 was 1.36. Appeals were denied, but overridden by Connie Snyder, the Dean of Student Services and former Financial Aid Director.

This student was never eligible for Title IV funding because the student did not have a high school diploma, GED or pass the ATB test.

2011-2012 SAP Policy¹

Student 5

The student was not making SAP at the end of the fall 2009 term and was placed on probation for the spring 2010 term. The student failed to meet SAP and should have been suspended for the spring 2011 term. The student continued to receive aid through the spring 2012 term. Notes in Banner indicate an appeal approved for summer 2010, but the student did not attend the summer 2010 term. Banner also indicates an appeal for fall 2011, spring 2012 and summer 2012. However, the appeal for fall 2011 should not have been approved since it was based on iron deficiency due to pregnancy. It is clearly stated in the SAP policy that pregnancy is not a reason for appeal.

The student received \$3,900 in Federal Pell Grant funds, \$6,604 in subsidized loan funds, and \$2,064 in unsubsidized loan funds for the 2011-2012 award year.

Student 24

The student has not been making satisfactory progress since spring 2009. The only appeal found in the file is for fall 2011. The student should not have received aid for fall 2011 and spring 2012. The student received \$5,550 in Federal Pell Grant funds and \$3,500 in subsidized Direct Loan funds for the 2011-2012 award year.

Section 2: Missing Satisfactory Academic Progress Appeal and Supporting Documentation

The institutions 2010-2011 Satisfactory Academic Progress Policy states that a Financial Aid Appeal form can be submitted to the institution's Appeal Committee for review based on mitigating circumstances. The circumstances to be considered are health, death of a family member, and undue hardship. Pregnancy is excluded except for unforeseen complications. The

¹ Refer to 34 C.F.R. § 668.34 for the regulatory citation regarding Finding 2: Satisfactory Academic Progress Policy for 2011-2012 Not Developed and Published as Required in the Program Review Report issued August 23, 2012.

appeal must include supporting documentation and actions taken to change the circumstances under which the student was not able to make satisfactory academic progress. The policy states that the Appeal Committee's decision is final.

Students 1, 6, 10 and 11 appealed their satisfactory academic progress standing, but no appeal documentation and/or supporting documentation was found for these students.

2010-2011 Award Year

Student 1

There is no documentation to back up the decision to approve the appeal for summer 2010.

There is no appeal documentation found for summer 2009, fall 2010, and spring 2011. Banner indicates an appeal for summer 2012, but there is no appeal in the file.

Student 1 received \$3,548 in Pell Grant funds for the 2008-2009 award year, \$6,689 in Pell Grant funds and \$1,789 in Direct Loan funds for the 2009-2010 award year, \$4,857 in Pell Grant funds and \$4,923 in Direct Loan funds for the 2010-2011 award year, and \$5,550 in Pell Grant funds and \$10,500 in Direct Loan funds for the 2011-2012 award year.

Student 6

There is no documentation of the appeal for spring 2011.

Student 6 received \$713 in Pell Grant funds for the 2010-2011 award year.

Student 10

The summer 2010 appeal was in the file and is approved, but there was no supporting documentation in the file. The appeal is also not in Banner (see Section 3 of this finding).

Banner indicates appeals for spring 2008, spring 2011 and summer 2011, but no appeal documentation was found.

Student 10 received \$2,675 in Pell Grant funds and \$1,791 in Direct Loan funds for the 2009-2010 award year. No aid was received for the other years.

Student 11

The student should have been suspended as of summer 2010, but the student appealed and was approved. However, there is no documentation to support the appeal.

The fall 2010 appeal was declined by the Appeal Committee, but overridden by (b)(6); (b)(7)(C) of the administration.

The appeal for spring 2011 was approved, but there is no supporting documentation. Student 11 received \$8,325 in Pell Grant funds, \$3,974 in subsidized Direct Loan funds, and \$1,649 in unsubsidized Direct Loan funds for the 2010-2011 award year.

2011-2012 Award Year

Student 24

The appeal for fall 2011 was done after the student should have been suspended under the new 2011-2012 regulations. Appeals documentation is missing for summer 2009 and summer 2011 as listed in Banner.

The student received \$4,731 in Pell Grant funds and \$2,983 in subsidized Direct Loan funds for the 2008-2009 award year, and \$4,163 in Pell Grant funds and \$2,666 in subsidized loan funds for the 2010-2011 award year.

Section 3: Inaccurate Records of Satisfactory Academic Progress

2010-2011 Award Year

Student 3

Banner indicates that the student is "over the max time frame" on the ZOASAPR screen and that "SAP Not Ok" on the ROASTAT screen. The student actually completed two degrees so the indications are false.

Student 4

The student's academic transcript indicates that the student is in "good standing" for spring 2011. However, the student was below the 67% attempted hours required in the SAP policy and should have been placed on probation 2. For fall 2011, the transcript indicates "good standing", but the student should have been suspended. The student received no aid for this semester, which indicates that the school did suspend the student's aid even though the notation on the transcript is "good standing."

Student 10

The summer 2010 appeal is not entered into Banner. The attempted hours in Banner do not match the attempted hours on the academic transcripts. The institution is also excluding learning support classes from the attempted hours even though the policy for 2010-2011 clearly states they are included.

2011-2012 Award Year

The Satisfactory Academic Progress policy for 2011-2012 states the student must complete and pass at least 67% of all credit hours attempted. This includes learning support classes.

The student is required to maintain a GPA as follows:

- *1-14 hours 1.0*
- *14-29 hours 1.6*
- *30-44+ hours 1.8*
- *45+ hours 2.0*

Student 18

Student 18 completed 80% of the attempted hours and had a GPA of 2.0, yet Banner indicates the student was placed on "warning" for the summer 2012 term. This does not agree with the policy.

Student 21

At the end of spring 2012, the student's academic transcript indicates "good standing", but Banner has "warning". It should be warning because the student's GPA was 1.0 after 21 hours, which, according to the SAP policy, is below the required 1.6.

Student 23

The institution did not implement the new SAP policy until May 2012. According to the notations on the academic transcript, the student was placed on "probation" for the spring 2012 term and then the student was suspended. Under the new regulations, the institution should have placed the student on "warning" and offered the student a chance to appeal. It is unclear if the student was suspended or given a warning. The transcript indicates that the student was suspended but the entry in Banner indicates "warning."

Required Action Summary:

The institution was required to return the ineligible funds for students 1 and 5.

The institution was also required to provide the appeal documentation for students 1, 6, 10, and 11. If the institution was unable to provide this documentation, it was required to be noted in the response to the program review report.

Due to the error rate of 40% (12 of 30 students), the institution was required to conduct a file review of all Title IV recipients for the 2010-2011 and 2011-2012 award years to determine if other student files were missing appeal documentation.

In addition, the institution was required to review all SAP determinations to determine if they are correct and if the overrides occurred because of extenuating circumstances.

The institution's policy for the 2010-2011 award year stated that the school included all attempts in calculating the 150% timeframe for SAP. However, in several cases, the institution excluded learning support classes. The institution must follow its policy even though the regulations do not require learning support classes to be included in the timeframe. The institution was required to conduct a file review to determine if the students were making SAP without excluding the learning support classes.

The institution was required to conduct file reviews and complete Excel spreadsheets by award year for those students identified as having (1) missing appeal documentation, (2) having incorrect determinations and overrides, and (3) not making 150% timeframe for SAP when including learning support.

The institution was required to provide an academic transcript for the students identified on the spreadsheets. For missing appeals found, it was required to provide a copy of any data related to the student's appeal, including notes in the Banner screens.

The institution was also required to submit a plan to update and accurately record in Banner and on the academic transcripts accurate data concerning satisfactory academic progress, attempted hours, and appeals.

Bainbridge's Response:

Student 1

Bainbridge stated that the student was granted an initial appeal and subsequently violated the appeal conditions. The school located additional appeal documentation for the student and placed it in the student's permanent file (included in Attachment A of Bainbridge's response to the PRR).

Student 5

The school stated that the student provided a medical excuse form on official letterhead stating that the student had complications with her pregnancy due to an iron deficiency. The school also stated that the student provided excuses for the days following the birth of the child as corroboration for the student's statement that the child was born with heart problems. This documentation was the basis for the appeal committee's decision to grant the student's SAP appeal for the Fall 2011 term. However, when asked to produce the documentation to this effect, Bainbridge was unable to provide the documentation as described.

Student 6

The school stated that the student was making SAP until the end of the Fall 2010 term, when the completion rate fell to 64%. The student was placed on SAP Warning. The student did not return to school for the following term (Spring 2011) or any subsequent term. No appeal was required.

Student 10

The school stated that the maximum timeframe appeal for the Summer 2010 term was granted based on a graduation plan established in the appeal, which listed the courses needed for certificate completion.

Student 11

The school did not respond regarding the Summer 2010 appeal that was approved without supporting documentation. The school did state that the Fall 2010 appeal, which was denied by the committee, was administratively overridden without authority by a staff member. Personnel action was taken against that staff member, and a new SAP policy was put into effect that includes guidelines for appeal approvals and overrides. The student's Spring 2011 appeal was approved based on medical documentation provided by the students for surgery during the term.

Student 16

The school concurred with the finding and stated that it would comply with the instructions in the FPRD.

Student 18

The school stated that there was a reporting issue within the Banner system. The system recorded all attempted hours, but only recorded the GPA points for learning support classes with a grade of D or F, instead of counting GPA points for grades of A, B, C, D and F. This issue was corrected by resetting the parameters within Banner in September 2012. The GPA for all students attending during the 2012-2013 academic year and beyond are accurate. With this system correction, more students would have or could have met the GPA requirements of the SAP standards under the 2010-2011 SAP policy. But the 150% timeframe calculations were correct.

File Review Response: Identify, Locate and Provide Missing Appeal Documentation-- including notes from Banner screens (all Title IV recipients for 2010-2011 and 2011-2012).

Appeal documents for students 1, 6, 10 and 11 were found in cold storage. The records were boxed for storage by the director and kept separate from the student's original file due to temporary relocation of the Financial Aid Office for remodeling. Bainbridge advised that all

files have now been relocated and the appropriate documentation has been placed in the student's enrollment file. Bainbridge also advised that the process of completing the relocation was still in progress during the time the on-site portion of the program review was conducted.

File Review Response: Recalculate SAP Including Learning Support Classes (all Title IV recipients for 2010-2011).

Bainbridge stated that the financial aid staff reviewed the correct SAP standing of all 2,018 students who had learning support classes and received federal financial aid. Because the correction was for grades to be included in the GPA calculation that hadn't been, no students lost their financial aid as a result of this correction.

Bainbridge financial aid staff also reviewed the end of spring for the 4,500 students who received federal aid for the 2010-2011 award year. This review didn't result in any student's losing their financial aid.

When reviewing the 4,601 students who received federal aid for the 2011-2012 award year the institution stated that it followed the new guidelines of one warning period and checked progress after every term. Bainbridge included a spreadsheet indicating the students who lost their aid and thus received funds they shouldn't have.

Final Determination:

Student 1

Based on the documentation and explanation provided by the school, the Department determined the student to be eligible for Title IV aid from the Spring 2011 through the Spring 2012 terms.

Student 5

The student did not meet SAP requirements and was therefore ineligible for aid for the Spring 2011 term. No documentation for an appeal for that term was provided to the reviewers. The student did submit an appeal to reinstate aid for the Fall 2011 term. However, the Department has determined that the student did not meet the documentation requirements as prescribed in the school's appeal policy. Therefore the student was ineligible for the aid disbursed for the 2010-2011 and 2011-2012 award years.

Student 5: Ineligible Funds

Award Year	Pell	DL Sub	DL Unsub	Totals
2010-2011	\$2,775	\$2,876	\$0	\$ 5,851
2011-2012	\$3,900	\$3,728	\$2,064	\$ 9,692
Totals	\$6,675	\$6,604	\$2,064	\$15,343

Student 10

At the end of Spring 2008, the student had earned 75 of 102 attempted hours. When the student returned to school in Summer 2010, she changed her major to Criminal Justice. The Criminal Justice program is 72 hours. In order to meet the 150% maximum timeframe requirement, the student would have to complete the program within 108 attempted hours. The student submitted a maximum timeframe appeal for the Summer 2010 term. The Department has determined that the appeal did not meet the documentation requirements as prescribed in the school's appeal policy. However, the school approved the appeal based on a graduation plan established in the appeal.

Student 10: Ineligible Funds

Award Year	Pell	DL Sub	DL Unsub	Totals
2009-2010	\$ 2,675	\$1,791	\$0	\$4,466
2010-2011	\$0	\$2,250	\$877	\$3,127
Totals	\$2,675	\$4,041	\$877	\$7,593

Student 11

The student did not meet SAP requirements for Summer 2010 and the 2010-2011 award year. In addition, the student did not meet the documentation requirements of mitigating circumstances as prescribed in the school's appeal policy for the academic terms in question. As a result, the student was ineligible for aid for those academic terms.

Student 11: Ineligible Funds

Award Year	Pell	DL Sub	DL Unsub	Totals
2009-2010	\$ 305	\$ 0	\$1,404	\$ 1,709
2010-2011	\$8,325	\$3,137	\$1,657	\$13,119
Totals	\$8,630	\$3,137	\$3,061	\$14,828

Student 16

The student received a total of \$26,835 in ineligible Title IV funds for attendance at Bainbridge College. These funds are a liability owed to the Department.