



February 26, 2015

Dr. Kimberly Wright Cassidy
President
Bryn Mawr College
101 North Marion Ave
Bryn Mawr, PA 19010

Sent Via Encrypted Email

RE: Final Program Review Determination
OPE ID: 00323700
PRCN: 20130328285

Dear Dr. Cassidy:

The U.S. Department of Education's (Department's) Philadelphia School Participation Division issued a program review report on July 12, 2013 covering Bryn Mawr College's (Bryn Mawr) 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 2011-2012 award years. Bryn Mawr's response was received on October 10, 2013. A copy of the program review report (and related attachments) and the institution's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by Bryn Mawr upon request. The Department has made final determinations based on information obtained during the program review and from documentation already submitted by Bryn Mawr. 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, and (3) notify the institution of its right to appeal.

This FPRD contains one or more findings regarding Bryn Mawr's failure to comply with the requirements of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the Clery Act) in Section 485(f) of the HEA, 20 U.S.C. § 1092(f), and the Department's regulations in 34 C.F.R. §§ 668.41 and 668.46. Since a Clery Act finding does not result in a financial liability, such a finding may not be appealed.

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School Participation Division - Philadelphia
100 Penn Square East Suite 311, Philadelphia PA 19107

The total liabilities due from the institution from this program review are \$50,030.69.

This final program review determination contains detailed information about the liability determination for all findings.

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 not contain any student PII. Instead, finding # 1 references students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix D. In addition, Appendices A and E also contain PII. These appendices were encrypted and sent separately to the institution via e-mail.

Appeal Procedures:

This constitutes the Department's FPRD with respect to the liabilities identified from the July 12, 2013 program review report. If Bryn Mawr 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 Bryn Mawr receives this FPRD. An original and four copies of the information Bryn Mawr 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

Bryn Mawr'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 Bryn Mawr'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 Stephen Conger at 215-656-5898 or email at Stephen.Conger@ed.gov. 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)

Nancy Paula Gifford
Division Director

cc: Ethel Desmarais, Director of Student Financial Services
Emily Espenshade, Chief of Staff, Office of the President

Prepared for
Bryn Mawr College

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OPE ID 00323700
PRCN 20130328285

Prepared by
U.S. Department of Education
Federal Student Aid
School Participation Division - Philadelphia

Final Program Review Determination
February 26, 2015

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B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Bryn Mawr College (Bryn Mawr) from April 29, 2013 to May 2, 2013. The review was conducted by Mr. Stephen Conger and Mr. Manuel Loera.

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

A sample of 15 files was identified for review from the 2011-2012 award year. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. In addition, 2 files were selected based on return to Title IV calculations. 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 July 12, 2013.

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

C. Findings and Final Determinations

Resolved Findings

Finding # 3

Bryn Mawr has taken the corrective action necessary to resolve finding # 3 of the program review report. Therefore, this finding may be considered closed. Findings requiring further action by Bryn Mawr are discussed below.

Findings with Final Determinations

The program review report finding requiring further action is summarized below. At the conclusion of the finding is a summary of Bryn Mawr's response to the finding, and the Department's final determination for that finding. A copy of the program review report issued on July 12, 2013 is attached as Appendix B.

Finding #1: Return to Title IV (R2T4) Calculation Errors>Returns Made Late

Citation Summary: When a recipient of Title IV funds withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, the institution must determine the amount of Title IV assistance that the student earned as of the student's withdrawal date. 34 C.F.R. § 668.22(a)(1).

The amount of unearned Title IV assistance to be returned is calculated by subtracting the amount of Title IV assistance earned by the student from the amount of Title IV aid that was disbursed to the student as of the date of the institution's determination that the student withdrew (Step #4, Part K of the worksheet). 34 C.F.R § 668.22 (e)(4).

The institution must return the lesser of the total amount of unearned Title IV assistance as calculated in Step #4, Part K of worksheet or an amount equal to the total institutional charges incurred by the student for the payment period or period of enrollment multiplied by the percentage of the Title IV grant or loan assistance that has not been earned by the student (Step #5, Part N of the worksheet). 34 C.F.R § 668.22 (g)(1).

Further, institutional charges used in this calculation usually are the charges that were initially assessed to the student for the entire payment period or period of enrollment as applicable. Initial charges may only be adjusted by those changes the institution made prior to the student's withdrawal, for example a change in enrollment status unrelated to the withdrawal. If, after a student withdraws, the institution changes the amount of institutional charges it is assessing a student or decides to eliminate all institutional charges, those changes affect neither the charges nor aid earned in the calculation. 2011-2012 FSA Handbook, Volume 5, Chapter 2, page 5-44.

The institution must return the unearned portion of the Title IV funds as soon as possible, but no later than 45 days after the institution's determination that the student withdrew. 34 C.F.R. § 668.22(j)(1).

Noncompliance Summary: Bryn Mawr failed to perform correctly Return to Title IV calculations for five students. In addition, Bryn Mawr returned late unearned Title IV program funds to the Department for two of the five students.

Required Action Summary: The Department required Bryn Mawr to conduct a file review of all students who withdrew and required a R2T4 calculation during the 2011-2012 award year. In addition, the institution was to review its policies and procedures to ensure that R2T4 calculations were performed correctly and funds were returned timely to the appropriate Title IV programs.

Bryn Mawr Response Summary: Bryn Mawr submitted its response on October 10, 2013 (Appendix C). Bryn Mawr concurred with the finding and completed the required file review of all students who withdrew and required a R2T4 calculation during the 2011-2012 award year. Bryn Mawr provided the results of the file review which identified 12 students.

Bryn Mawr's file review identified 11 instances where an incorrect amount for institutional charges was used while performing R2T4 calculations. In each case, Bryn Mawr completed a revised R2T4 calculation using the correct institutional charges.

The file review identified one unmade return. The calculation was correct; however, the required Title IV funds have not been returned.

The file review identified five returns that were returned late. The days late ranged from 7 to 106 days.

Finally, Bryn Mawr provided revised policies and procedures to ensure that R2T4 calculations are performed correctly and that funds are returned to the appropriate Title IV programs timely.

Final Determination: The Department has determined that Bryn Mawr failed to perform R2T4 calculations correctly in 11 instances; it failed to return unearned Title IV funds timely in five instances; and, in one instance, it failed to return unearned funds. Further, based on the revised R2T4 calculations provided in its response to this finding, Bryn Mawr is required to return additional Federal Direct Loan funds in ten of the 11 instances. The additional amount of loan funds that must be returned to the Department is \$49,255.69. The following chart provides a detailed analysis of the response.

No.	Amount returned based on original R2T4 calculation	Title IV program	Date original return was made	Date Return of funds was due	Number of days late	Additional amount to be returned based on correct R2T4 calculation-DLU	Additional amount to be returned based on correct R2T4 calculation-DLS	Additional amount to be returned based on correct R2T4 calculation-DLP
R-1	\$2,786.00	DLU	10/19/2011	11/18/2011	0	\$3,184.00		
		DLS			0		\$496.17	
R-2	\$3,205.00	DLU	12/8/2011	11/11/2011	27	\$2,765.00		
		DLS			0		\$1,199.90	
R-3	\$1,698.00	DLU	9/29/2011	11/3/2011	0	\$3,916.00		
		DLS			0		\$2,083.23	
R-4	\$964.00	DLU	9/29/2011	10/23/2011	0	\$5,006.00		
		DLS			0		\$3,117.31	
R-5		DLU			0			
	\$1,776.00	DLS	11/7/2011	10/31/2011	7		\$1,657.95	
R-6	\$1,915.00	DLU	10/19/2011	11/3/2011	0	\$583.00		
		DLS			0		\$2,096.54	
R-7	\$650.00	FPELL	2/7/2012	10/24/2011	106			
	\$373.00	FSEOG	2/7/2012	10/24/2011	106			
R-8	\$0.00	DLU	return unmade	12/12/2011	0	\$2,737.00		
	\$0.00	DLP	return unmade	12/12/2011	0			\$8,047.94
R-9	\$881.00	DLU	3/15/2012	3/3/2012	12	\$5,089.00		
		DLS	3/15/2012	3/3/2012	12		\$4,035.22	
R-10	\$0.00	DLU	4/3/2012	4/14/2012	0	\$2,772.00		
	\$1,486.00	DLS	4/3/2012	4/14/2012	0			
R-11	\$995.00	DLU	5/8/2012	4/30/2012	8			
	\$1,456.00	DLS	5/8/2012	4/30/2012	8		\$469.43	

Totals per program \$26,052.00 \$15,155.75 \$8,047.94

Grand total \$49,255.69

For student R-10, the revised R2T4 calculation required the return of \$4,193 in Unsubsidized Direct Loan Program funds and \$65 in Subsidized Direct Loan Program funds. In the original R2T4 calculation, the institution returned \$1,486 in Subsidized Direct Loan Program funds. As a result of the revised calculation, the institution must reallocate \$1,421 of the \$1,486 of the Subsidized Direct Loan Program funds as Unsubsidized Direct Loan Program funds. In addition, as noted in the spreadsheet, the institution must then return an additional \$2,772 in Unsubsidized Direct Loans.

Due to the number of unpaid and late refunds, the institution is required to have on file with the Department an irrevocable Letter of Credit (LOC) equal to 25 percent of the total refunds made or should have made during the most recently closed fiscal year. 34 C.F.R. § 668.173(d). Instructions for submitting the LOC will be sent to the institution under separate cover.

The Department incurs a cost when it makes funds available to an institution because it borrows those funds from the U.S. Treasury and the Department must pay interest charges on those funds. The Department has determined the cost to the government for the incorrect/late returns in this finding is \$775.00. The results of these calculations are included as Appendix E.

Finally, Bryn Mawr must make student level adjustments for the 10 students identified who require additional funds returned, to Common Origination and Disbursement (COD) prior to the repayment of the liability. Instructions for seeking administrative relief for COD are provided below.

1. Contact COD Customer Relations at 1 800 848-0978 or by e-mail to CODCustomersupport@acs-inc to request extended processing and provide the reason for the request. (The school makes the necessary adjustments and informs COD that they are finished making the adjustments.)
2. Make the adjustments to draw the funds through G5 and COD.

The total liability for this finding is \$50,030.69. Section E of this report provides instructions for the repayment of this liability.

Finding # 2. Failure to Conduct a Biennial Review

Citation Summary: Each IHE must conduct a biennial review in order to measure the effectiveness of its drug prevention program, and to ensure consistent treatment in its enforcement of its disciplinary sanctions. The IHE must prepare a report of findings and maintain its biennial review report and supporting materials and make them available to the Department upon request. 34 C.F.R. §§ 86.3 and 86.100

Noncompliance Summary: Bryn Mawr violated multiple provisions of the DFSCA and the Department's Part 86 regulations. Bryn Mawr failed to conduct a Biennial Review (BR) and also failed to prepare a BR report of findings.

Bryn Mawr did provide to the Department review team a word document titled **Academic Year Drug and Alcohol Prevent Program**. Within this document, Section VIII Biennial Review, states:

“Beyond internal reports and summaries shared among, as needed, Campus Safety, the Health Center and Counseling Service, and Dean's Office staff on a weekly, semester or academic year basis (depending on the information therein), a publicly available Biennial Review has not, to date, been formally assembled or distributed by the College.”

The BR is intended to periodically assess the effectiveness of the institution's drug and alcohol prevention program (DAAPP) and in so doing, identify any necessary modifications or improvements and to evaluate the consistency of disciplinary sanctions imposed for any violations of the institution's drug and alcohol-related policies or codes of conduct.

Required Action Summary:

Bryn Mawr was required to take all necessary corrective actions to resolve these violations and the institution was directed to complete the following:

- Develop and implement a comprehensive DAAPP that includes all of the required elements found in the DFSCA and the Department's Part 86 regulations and publish a compliant DAAPP disclosure;
- Develop procedures for ensuring that the DAAPP disclosure is distributed to every student who is currently enrolled for academic credit and all employees (including part-time, intermittent, and as-needed personnel). These materials were required to be submitted with the institution's response to the Program Review Report;
- Bryn Mawr was required to conduct a biennial review to measure the effectiveness of its DAAPP. The institution was to describe the research methods and data analysis tools that it used to determine the effectiveness of the program and identify the responsible official(s) and office(s) that conducted the biennial review. Finally, Bryn Mawr's biennial review was to be approved by the institution's chief executive and/or its Board. The biennial review was required to be completed by September 2, 2013 and submitted to the Department by September 16, 2013.
- Bryn Mawr was required to establish policies and procedures to ensure that all subsequent biennial reviews are conducted in a timely manner and are fully documented and to take all other necessary action to ensure that this violation does not recur.

Bryn Mawr's Response: The institution concurs with this finding that Bryn Mawr failed to conduct a Biennial Review. Bryn Mawr stated in its response that a BR was conducted in the summer of 2013 which included a review of the College's DAAPP and procedures for distributing the DAAPP. In addition, Bryn Mawr has formed a committee to conduct future biennial reviews to ensure the institution remains in compliance. The results of the summer 2013 BR and its DAAPP were included with the institution's response to the program review report.

Final Determination: This finding cited Bryn Mawr for multiple violations of the Drug-Free Schools and Communities Act (DFSCA) and Part 86 of the Department's General Administrative Regulations. Specifically, the institution failed to develop and implement a substantive drug and alcohol abuse prevention program (DAAPP) and also failed to publish an accurate and complete DAAPP disclosure that summarized the program. As a result of these violations, Bryn Mawr also failed to actively distribute program information to current employees and all students enrolled for academic credit. In addition, Bryn Mawr failed to conduct a biennial review of the DAAPP's effectiveness. These violations necessarily follow from each other because the biennial review is primarily a study of the DAAPP's effectiveness. Therefore, an institution cannot conduct a proper biennial review until it has a fully-functional DAAPP in place. As a result of these violations, Bryn Mawr was required to develop and implement a comprehensive DAAPP in the manner prescribed by Federal regulations and to conduct a biennial review and prepare a report of findings. The institution was required to submit a copy of its biennial review report. As with all findings of violation, Bryn Mawr also was directed to take all necessary corrective action to ensure that all DFSCA deficiencies identified during the program review do not recur and to otherwise ensure that the DAAPP is materially-complete and that it accurately reflects current law and institutional policy.

Bryn Mawr stated in its response to the PRR that a BR was conducted in the summer of 2013 which included a review of the College's DAAPP and procedures for distributing the DAAPP. In addition, Bryn Mawr has formed a committee to conduct future biennial reviews to ensure the institution remains in compliance. The institution submitted the BR with its response and the Department has reviewed the report and found that the BR report adequately meets the Federal Regulations for Part 86 of the Federal Code of Regulations.

In addition, the Department has reviewed Bryn Mawr's 2013 and 2014 ASR which includes the institution's Fire Safety Report and has found both ASR's satisfy Federal requirements.

D. Summary of Liabilities

The total amount owed to the Department is \$50,030.69. This amount includes principal and interest owed by Bryn Mawr College. Appendix E details the breakdown of this liability.

E. Payment Instructions

Bryn Mawr owes to the Department \$50,030.69. Payment must be made by forwarding a check made payable to the "U.S. Department of Education" to the following address within 45 days of the date of this letter:

U.S. Department of Education
P.O. Box 979026
St. Louis, MO 63197-9000

Remit checks only. Do not send correspondence to this address.

Payment must be made via check and sent to the above Post Office Box. Payment and/or adjustments made via G5 will not be accepted as payment of this liability. Instead, the school must first make any required adjustments in COD as required by the applicable finding(s) and Section II – Instructions by Title IV, HEA Program (below), remit payment, and upon receipt of payment the Department will apply the funds to the appropriate G5 award (if necessary).

The following identification data must be provided with the payment:

Amount: \$50,030.69
DUNS: 067398420
TIN: 231352621
Program Review Control Number: 201330328285

Terms of Payment

As a result of this final determination, the Department has created a receivable for this liability and payment must be received by the Department within **45 days of the date of this letter**. If payment is not received within the 45-day period, interest will accrue in monthly increments from the date of this determination, on the amounts owed to the Department, at the current value of funds rate in effect as established by the Treasury Department, until the date of receipt of the payment. Bryn Mawr is also responsible for repaying any interest that accrues. If you have any questions regarding interest accruals or payment credits, contact the Department's Accounts Receivable Group at (202) 245-8080 and ask to speak to Bryn Mawr's account representative.

If full payment cannot be made within **45** days of the date of this letter, contact the Department's Accounts Receivable Group to apply for a payment plan. Interest charges and other conditions apply. Written request may be sent to:

U.S. Department of Education
OCFO Financial Management Operations
Accounts Receivable Group
550 12th Street, S.W., Room 6114
Washington, DC 20202-4461

If within 45 days of the date of this letter, Bryn Mawr has neither made payment in accordance with these instructions nor entered into an arrangement to repay the liability under terms satisfactory to the Department, the Department intends to collect the amount due and payable by administrative offset against payments due Bryn Mawr from the Federal Government. **Bryn Mawr may object to the collection by offset only by challenging the existence or amount of the debt.** To challenge the debt, Bryn Mawr must **timely appeal** this determination under the procedures described in the "Appeal Procedures" section of the cover letter. The Department will use those procedures to consider any objection to offset. **No separate appeal opportunity will be provided.** If a timely appeal is filed, the Department will defer offset until completion of the appeal, unless the Department determines that offset is necessary as provided at 34 C.F.R. § 30.28. This debt may also be referred to the Department of the Treasury for further action as authorized by the Debt Collection Improvement Act of 1996.

Direct Loan Liabilities

Finding # 1: Return to Title IV Returns Made Late/Calculations Incorrect
Appendix E

Bryn Mawr must repay the following Direct Loan liabilities:

DL Closed Award Year		
Amount (Principal)	Amount (Interest)	Award Year
\$49,255.69	\$775.00	2011-2012
Total Principal	Total Interest	
\$49,255.69	\$775.00	

The funds will be returned to the applicable G5 award for the applicable Title IV program.

F. Appendices

- Appendix A, Student Sample
- Appendix B, Program Review Report
- Appendix C, Institution's Written Response
- Appendix D, List of Students for Finding #1 R2T4 Calculations
- Appendix E, Cost of Funds Calculation
- Appendix F, Personally Identifiable Information Instructions

Appendices A, D, and E, contain personally identifiable information and will be emailed to UVF 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.

Appendices B, C, and F are attached to this report.



July 12, 2013

Dr. Kimberly Wright Cassidy
Interim President
Bryn Mawr College
101 North Merion Avenue
Bryn Mawr, PA 19010-2899

UPS Tracking Number:
1ZA5467Y0192555286

RE: Program Review Report
OPE ID: 00323700
PRCN: 201330328285

Dear Dr. Cassidy:

From April 29, 2013 through May 2, 2013, Mr. Stephen Conger and Mr. Manuel Loera as representatives of the U.S. Department of Education conducted a review of Bryn Mawr College's (Bryn Mawr) 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 Bryn Mawr. The response should include a brief, written narrative for each finding that clearly states Bryn Mawr's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, Bryn Mawr 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 report¹ 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.

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

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 written response will not be attached to the FPRD. However, it will be retained and available for inspection by Bryn Mawr 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 Stephen Conger of this office within 60 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, Appendix A that contains a list of the students sampled by the Department were 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 Stephen Conger at 215-656-5898 or stephen.conger@ed.gov.

Sincerely,

(b)(6)

John S. Loreng
Compliance Manager

cc: Ethel Desmarais, Director of Student Financial Services
Emily Espenshade, Chief of Staff, Office of the President

Enclosure:
Protection of Personally Identifiable Information

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. 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).

PII being submitted electronically or on media (e.g., CD-ROM, floppy disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip (Version 9.0) and are encrypted with AES encryption. Zipped files using WinZip must be saved as Legacy compression (Zip 2.0 compatible).

The Department must receive an access password to view the encrypted information. The password must be e-mailed separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).

Hard copy files and media containing PII must be:

- sent via a shipping method that can be tracked with signature required upon delivery
- double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
- labeled with both the "To" and "From" addresses on both the inner and outer packages
- identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender).

PII data cannot be sent via fax.

Prepared for
Bryn Mawr College

Federal Student 
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OPE ID: 00323700
PRCN: 201330328285

Prepared by
U.S. Department of Education
Federal Student Aid
School Participation Division - Philadelphia

Program Review Report

July 12, 2013

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B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Bryn Mawr College (Bryn Mawr) from April 29, 2013 to May 2, 2013. The review was conducted by Mr. Stephen Conger and Mr. Manuel Loera.

The focus of the review was to determine Bryn Mawr'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 Bryn Mawr'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. An additional 2 student files were selected and reviewed regarding 3) received all non-passing grades. 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 Bryn Mawr'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 Bryn Mawr 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 Bryn Mawr to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding #1: Return to Title IV (R2T4) Calculation Errors>Returns Made Late

Citation:

When a recipient of Title IV funds withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, the institution must determine the amount of Title IV assistance that the student earned as of the student's withdrawal date. 34 C.F.R. § 668.22(a)(1).

The amount of unearned Title IV assistance to be returned is calculated by subtracting the amount of Title IV assistance earned by the student from the amount of Title IV aid that was disbursed to the student as of the date of the institution's determination that the student withdrew (Step #4, Part K of the worksheet). 34 C.F.R § 668.22 (e)(4).

The institution must return the lesser of the total amount of unearned Title IV assistance as calculated in Step #4, Part K of worksheet or an amount equal to the total institutional charges incurred by the student for the payment period or period of enrollment multiplied by the percentage of the Title IV grant or loan assistance that has not been earned by the student (Step #5, Part N of the worksheet). 34 C.F.R § 668.22 (g)(1).

Further, institutional charges used in this calculation usually are the charges that were initially assessed to the student for the entire payment period or period of enrollment as applicable. Initial charges may only be adjusted by those changes the institution made prior to the student's withdrawal, for example a change in enrollment status unrelated to the withdrawal. If, after a student withdraws, the institution changes the amount of institutional charges it is assessing a student or decides to eliminate all institutional charges, those changes affect neither the charges nor aid earned in the calculation. *2011-2012 FSA Handbook, Volume 5, Chapter 2, page 5-44.*

Finally, the institution must return the unearned portion of the Title IV funds as soon as possible, but no later than 45 days after the institution's determination that the student withdrew. 34 C.F.R. § 668.22(j)(1).

Noncompliance:

Bryn Mawr failed to properly calculate the Return to Title IV Funds for five students. In addition, Bryn Mawr failed to return unearned Title IV program funds within 45 days for two of the five students.

Specifically, for students #3, 6, 9, 12, and 14, Bryn Mawr used incorrect institutional charges when calculating the amount of Title IV funds to be returned. Bryn Mawr used institutional charges that were adjusted after the student withdrew. Using the adjusted institutional charges resulted in the institution not returning a sufficient amount of funds to the Title IV programs. The chart in Appendix B provides additional details.

Bryn Mawr failed to return the unearned Title IV program funds within 45 days for students #12 and 14. The chart below provides the details:

Student #	Date of Determination	Return Due Date	Return Made Date	# of days late
12	9/16/2011	10/31/2011	11/4/2011	4
14	1/18/2012	3/3/2012	3/14/2012	10

Failure to properly calculate the R2T4 calculations and to return unearned Title IV funds timely result in additional expense to both the Department and the individual student involved. Further, the student may incur additional interest charges on outstanding loans funds.

Required Action:

Bryn Mawr must conduct a file review of all students who withdrew and required a Return to Title IV calculation during the 2011-2012 award year. Bryn Mawr must compile the results of the file review in a spreadsheet in both hard copy and electronic format. These results are to be sent with its response to the program review report.

The spreadsheet must include the following columns:

1. Student Name;
2. Student Social Security Number;
3. Institutional Charges used in calculation;
4. Correct institutional charges;
5. Last Day of Attendance;
6. Date of Determination of Student Withdrawal;
7. Start date of term;
8. Scheduled end date;
9. Total days in term;
10. Return based on original calculation;
11. Original Return by program (i.e. Pell, Subsidized Direct Loan, etc.);
12. Additional Amount due based on new calculation by program (i.e. Pell, Subsidized Direct Loan, etc.);
13. Date return was made with supporting documentation; and
14. Date return of funds was due.

Further, the institution must review its policies and procedures to ensure R2T4 calculations are performed correctly and funds are returned to the appropriate Title IV programs in a timely manner. Any updates to policies and procedures must accompany its response to the program review report.

Instructions for the repayment of any determined liability will be provided in the Final Program Review Determination letter.

Finding # 2: Failure to Conduct Biennial Review

Citation:

The Drug-Free Schools and Communities Act (DFSCA) and Part 86 of the Department's General Administrative Regulations requires each participating institution of higher education (IHE) to certify that it has developed and implemented a drug and alcohol abuse education and prevention program. The program must be designed to prevent the unlawful possession, use, and distribution of drugs and alcohol on campus and at recognized events and activities.

On an annual basis, the IHE must distribute written information about its drug and alcohol abuse prevention program (DAAPP) to all students, faculty, and staff. The distribution plan must make provisions for providing the material to students who enroll at a date after the initial distribution, and for employees who are hired at different times throughout the year. The information must include:

- A written statement about its standards of conduct that prohibits the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees;
- A written description of legal sanctions imposed under Federal, state and local laws for unlawful possession or distribution of illicit drugs and alcohol;
- A description of the health risks associated with the use of illicit drugs and alcohol abuse;
- A description of any drug or alcohol counseling, treatment, or rehabilitation or re-entry programs that are available to students and employees; and,
- A statement that the IHE will impose disciplinary sanctions on students and employees for violations of the institution's codes of conduct and a description of such sanctions.

In addition, each IHE must conduct a biennial review in order to measure the effectiveness of its drug prevention program, and to ensure consistent treatment in its enforcement of its disciplinary sanctions. The IHE must prepare a report of findings and maintain its biennial review report and supporting materials and make them available to the Department upon request.

34 C.F.R. §§ 86.3 and 86.100.

Noncompliance:

Bryn Mawr violated multiple provisions of the DFSCA and the Department's Part 86 regulations. Bryn Mawr failed to conduct a Biennial Review (BR) and also failed to prepare a BR report of findings.

Bryn Mawr did provide to the Department review team a word document titled **Academic Year Drug and Alcohol Prevent Program**. Within this document, Section VIII Biennial Review, states:

“Beyond internal reports and summaries shared among, as needed, Campus Safety, the Health Center and Counseling Service, and Dean’s Office staff on a weekly, semester or academic year basis (depending on the information therein), a publicly available Biennial Review has not, to date, been formally assembled or distributed by the College.”

The BR is intended to periodically assess the effectiveness of the institution’s drug and alcohol prevention program (DAAPP) and in so doing, identify any necessary modifications or improvements and to evaluate the consistency of disciplinary sanctions imposed for any violations of the institution’s drug and alcohol-related policies or codes of conduct.

As a consequence of the institution’s failure to develop and implement a DAAPP, Bryn Mawr also has failed to publish and distribute a DAAPP disclosure as required. The institution does not currently have a DAAPP disclosure or a formal policy in place to distribute it to all employees and students enrolled for academic credit.

Failure to comply with The Drug-Free Schools and Communities Act requirements deprives students and employees of important information regarding the educational, health, legal, disciplinary, and financial consequences of illicit drug use and alcohol abuse. Such failures may contribute to increased drug and alcohol abuse on-campus as well as an increase in drug and alcohol-related violent crime.

Required Action:

Bryn Mawr is required to take all necessary corrective actions to resolve these violations. At a minimum, Bryn Mawr must do the following:

- Develop and implement a comprehensive DAAPP that includes all of the required elements found in the DFSCA and the Department’s Part 86 regulations and publish a compliant DAAPP disclosure;
- Develop procedures for ensuring that the DAAPP disclosure is distributed to every student who is currently enrolled for academic credit and all employees (including part-time, intermittent, and as-needed personnel). When the new program materials are complete, Bryn Mawr must submit a copy of its draft DAAPP and new distribution policy with its response to this program review report. Once the materials are approved by the Department, the institution will be required to distribute them in accordance with the Part 86 regulations, and provide documentation evidencing the distribution as well as a certification statement attesting to the fact that the materials were distributed in accordance with the DFSCA;

- Conduct a biennial review to measure the effectiveness of its DAAPP. The institution must describe the research methods and data analysis tools that will be used to determine the effectiveness of the program and identify the responsible official(s) and office(s) that conducted the biennial review. Finally, Bryn Mawr's biennial review report must be approved by the institution's chief executive and/or its Board. The biennial review must be completed by September 2, 2013 and the institution's report of findings must be submitted to the Department by September 16, 2013.
- Establish policies and procedures to ensure that all subsequent biennial reviews are conducted in a timely manner and are fully documented and to take all other necessary action to ensure that this violation does not recur.

As noted above, violations of the DFSCA are very serious and by their nature, cannot be cured. Bryn Mawr will be given an opportunity to bring its drug and alcohol program into compliance with the DFSCA as required by its Program Participation Agreement. However, the institution is advised that these remedial measures cannot and do not diminish the seriousness of these violations nor do they eliminate the possibility that the Department will impose additional corrective or administrative actions.

Based on an evaluation of all available information, including Bryn Mawr response, the Department will determine if additional action will be required and will advise the institution accordingly in the Final Program Review Determination letter.

Finding # 3: Inaccurate Reporting to the Common Origination and Disbursement System

Citation:

An institution shall report to the Secretary any change in the amount of a Federal Pell Grant for which a student qualifies including any related payment data changes by submitting to the Secretary the student's payment data that discloses the basis and result of the change in award for each student. The institution shall submit the student's payment data reporting any change to the Secretary by the reporting deadlines published by the Secretary in the Federal Register. 34 C.F.R. § 690.83(b)(1). The Federal Register published June 29, 2012 established this reporting deadline as 30 days after making a disbursement or becoming aware of the need for a change. (Federal Register, Volume 77, # 126.) An institution reports this information to the Secretary through the Common Origination and Disbursement System (COD).

An institution must submit the initial disbursement record for a Direct Loan to the Secretary no later than 30 days following the date of the initial disbursement. The institution must submit subsequent disbursement records, including adjustment and cancellation records, to the Secretary no later than 30 days following the date the disbursement, adjustment or cancellation is made. 34 C.F.R. § 685.301(e). An institution reports this information to the Secretary through COD.

For both Federal Pell Grant and Federal Direct Loan disbursements that occur on or after April 1, 2013, an institution is required to submit disbursement information no later than 15 calendar days after the institution makes a disbursement or becomes aware of the need to make an adjustment to previously reported data. (Federal Register, Volume 78, # 40.)

An institution is considered to have made a disbursement on the date the institution credits a student's account at the institution or makes a payment directly to the student with funds received from the Secretary. 34 C.F.R. § 668.164(a)(1).

Noncompliance:

Bryn Mawr failed to report accurately disbursement records for Federal Pell Grant and Direct Loan funds to the Common Origination and Disbursement System for six students. Specifically, Bryn Mawr failed to update disbursement data for students #1, 7, 8, 10, 11, and 12. The chart below represents the disbursement dates recorded on the student ledger and the corresponding dates reported in COD.

Student #	Title IV Aid	Amount	Disbursement Date per student ledger	Disbursement Date reported to COD
1	Pell Grant	\$2,775.00	09/23/2011	08/26/2011
	Pell Grant	\$2,775.00	02/08/2012	01/06/2012
7	Pell Grant	\$2,775.00	09/23/2011	08/26/2011
	Pell Grant	\$2,775.00	03/09/2012	01/06/2012
8	Pell Grant	\$2,775.00	11/16/2011	08/26/2011
10	Pell Grant	\$2,775.00	09/23/2011	08/26/2011
	Pell Grant	\$2,775.00	01/06/2012	01/28/2012
11	Pell Grant	\$278.00	11/17/2011	08/26/2011
12	Direct Sub Loan	\$2,453.00	08/19/2011	08/10/2011

The institution's failure to report accurate information may cause an increase in expense for both students and the Department.

Required Action:

As a result of the high occurrence of inaccurate disbursement information reported in COD, Bryn Mawr must conduct a file review of all data previously reported in COD for students enrolled at the institution during the 2011-2012 award year. Bryn Mawr must update any inaccurate information identified in COD.

Bryn Mawr should compile the results of this review in a spreadsheet. The spreadsheet should be formatted to include the following data and must be submitted in both hardcopy and electronic formats with its response to this program review report.

1. Student's Name;
2. Social Security Number;
3. Academic Year;
4. Title IV Program;
5. Disbursement Number;
6. Disbursement Amount and Date previously reported for the student in COD; and
7. The revised Disbursement Amount and Date reported for the student in COD.

In addition, Bryn Mawr must review its policies and procedures to ensure that they are sufficient to prevent a recurrence of this finding. The institution must provide a copy of the updated policies with its response to this report.

D. Appendices

Appendix A (Student Sample) contains personally identifiable information and will be emailed to Bryn Mawr 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. Appendix B is attached and refers to each student within the finding by the student number assigned by the Department. Please refer to the 2011-2012 Student Stat Sample provided by the Department during the on-site visit to identify the students within Appendix B.