



July 10, 2015

Mr. Allen Ivan, President  
Central Georgia Technical College  
80 Cohen Walker Drive  
Warner Robins, GA 31088-2730

UPS 2nd Day Air  
1ZA87964NY92987225

RE: **Final Program Review Determination**  
OPE ID: 005763-00  
PRCN: 201420428534

Dear Mr. Ivan:

The U.S. Department of Education's (Department's) School Participation Division - Atlanta issued a program review report on June 17, 2014 covering Central Georgia Technical College's (CGTC) 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 2012-2013 and 2013-2014 award years. CGTC's final response was received on November 18, 2014. A copy of the program review report (and related attachments) and CGTC's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by CGTC 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.

The total liabilities due from the institution from this program review are **\$4,940**.

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 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, Appendices **A, B, C and G** also contain PII.

### **Appeal Procedures:**

This constitutes the Department's FPRD with respect to the liabilities identified from the June 17, 2014 program review report. If CGTC 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 CGTC receives this FPRD. An original and four copies of the information CGTC submits must be attached to the request. The request for an appeal must be sent to:

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

CGTC'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 CGTC'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).** rgrtrt

**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 Alicia Scott at 404-974-9491. Questions relating to any appeal of the FPRD should be directed to the address noted in the Appeal Procedures section of this letter.

Sincerely,



Chris Miller  
Division Director

**Enclosure:**

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

cc: Shirley Glover, Financial Aid Administrator  
Jackie White, Financial Aid Administrator  
Technical College System of Georgia  
Southern Association of Colleges and Schools Commission  
Department of Defense  
Department of Veterans Affairs  
Consumer Financial Protection Bureau

## 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

Central Georgia Technical  
College

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

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the AMERICAN MIND™

**OPE ID** 00576300  
**PRCN** 201420428534

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

# Final Program Review Determination

## July 10, 2015

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**A. Institutional Information**

Central Georgia Technical College  
80 Cohen Walker Drive  
Warner Robins, GA 31088-2729

Type: Public

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Highest Level of Offering: Associates Degree

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

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Current Student Enrollment: 10,500 (2013-2014)

% of Students Receiving Title IV, HEA funds: 62% (2013-2014)

Title IV, HEA Program Participation: Postsecondary Education Participation System (PEPS)

	<b>2012-2013</b>
Federal PELL Grant	\$6,983,902
William D. Ford Federal Direct Loan Program (Direct Loan)	\$8,740,839
Federal Supplemental Educational Opportunity Grant (FSEOG)	\$67,934
Federal Work Study Program (FWS)	\$30,750

## **B. Scope of Review**

The U.S. Department of Education (the Department) conducted a program review at Central Georgia Technical College (CGTC) from February 24, 2014 through February 28, 2014. The review was conducted by Ms. Alicia Scott and Ms. Sherry Blackman.

The focus of the review was Enrollment Reporting. The review consisted of an examination of CGTC's withdrawal policy and procedures and examination of individual student files.

A sample of 30 files was identified for review from the 2012-2013 and 2013-2014 (year to date) award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. 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 June 17, 2014.

### **Disclaimer:**

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning CGTC'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 CGTC 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**

Findings 1, 4, 6, 7, 8, 9, 10, 11, 12,13,14,15,16,17,18, and 19

CGTC has taken the corrective actions necessary to resolve findings 1, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, and 19 of the program review report. Therefore, these findings may be considered closed. Please refer to Appendix C which contains the institution's response related to the resolved findings. Findings requiring further action by CGTC 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 CGTC's response to the finding, and the Department's final determination for that finding. A copy of the program review report issued on June 17, 2014 is attached as Appendix E.

***Finding 2: Return of Title IV Not Made***

**Citation:** 34 § C.F.R. 668.22 states when a recipient of Title IV grant or loan funds withdraws from a school (officially or unofficially) after beginning attendance, the amount of Title IV funds earned by the student must be determined. Return to Title IV Funds (R2T4) calculations are based on a statutory formula developed by the Department and must be used on all recipients of FSA funds. The formula is based, in part, on the amount of time a student actually spent in attendance at the school. If the amount disbursed to the student is greater than the amount the student earned, unearned funds must be returned no later than 45 days after the date the institution determined that the student

withdrew. If the amount disbursed to the student is *less* than the amount the student earned, and for which the student is otherwise eligible, the student may be eligible to receive a post-withdrawal disbursement of the earned aid not received.

An institution must have a procedure for determining whether a Title IV recipient who began attendance during a period completed the period or should be treated as a withdrawal. If a student who began attendance and has not officially withdrawn fails to earn a passing grade in at least one course offered over an entire period, the institution must assume, for Title IV purposes, that the student has unofficially withdrawn, unless the institution can document that the student completed the period. In the absence of evidence of a last day of attendance at an academically related activity, a school must consider a student who failed to earn a passing grade in all classes to be an unofficial withdrawal. Refer to the 2012-2013 Federal Student Aid (FSA) Handbook, Vol. 5.

**Noncompliance:** CGTC did not have an internal policy for the 2012-2013 academic year to identify students who unofficially withdrew from the institution. Specifically, for students who did not receive a passing grade in an academic term, the institution did not determine that the student withdrew and did not perform an R2T4 calculation.

**Required Action:** The institution was required to review all of its files for the 2012-2013 award year for all students who unofficially withdrew and/or did not earn at least one passing grade in courses for which the student enrolled. Once the institution completed its file review, it was required to provide a list of all students who did not earn 60% or more of Title IV funds disbursed to them.

**CGTC's Response:** During July 2013, CGTC received an internal audit from the Georgia Department of Audits and Accounts (excerpt below). During this audit it was found that unearned Title IV funds were not identified and returned for students who unofficially withdrew from the College. Reports were created by the College's IT Department, with assistance from Financial Aid, that provided a list of students who received all Fs, all Ws, and all Ws and Fs for a term. With cooperation from the Financial Aid office, Registrar, and Instructors from Academic Affairs office, the lists

were reviewed and last dates of attendance were determined for these students using attendance rosters. Title IV aid awards for these students were adjusted accordingly. For students that a last date of attendance could not be determined, the 50% point of the term was used for the calculation of the Title IV award adjustment. For 2012-2013 and fall 2013, CGTC was new to Direct Loan processing and the college returned its portion and the student's portion of unearned loan funds. Beginning Spring of 2014, CGTC began returning only its portion of Direct Loan fund. For Direct Loan funds that are the responsibility of the student, the student will be responsible for returning those funds according to the terms of the loan agreement. A copy of the College's unofficial withdrawal policy is attached as 'F2.4 CGTC Unofficial Withdrawals'. The withdrawal reports and necessary Title IV award adjustments will be processed at the end of each term going forward.

**Final Determination:** CGTC provided a revised withdrawal policy and the required file review for 2012-2013. The liability from the file review is \$120,403.41 in Subsidized and Unsubsidized Direct Loans, and \$196,149.76 in Pell Grant. The institution processed downward adjustments for the students identified in this finding and *returned* the funds to the Department. The Cost of Funds (COF) due to the Department resulting from this finding is \$1,773. The COF is the expense the Department incurred as a result of CGTC retaining ineligible funds and is included as Appendix F (Late/Unmade Returns/Loans and Non-Loans).

### ***Finding 3: Return To Title IV (R2T4) Calculation Errors***

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

The FSA Handbook, Volume 2 states that unearned funds must be returned no later than 45 days after the date of the school's determination that the student withdrew.

**Noncompliance:** During the review, the reviewers found R2T4 calculation errors for several students.

**Required Action:** The institution was required to conduct a file review of R2T4 calculations for students who attended CGTC during the 2012-2013 award year to determine if an R2T4 calculation should be performed for any additional students. Also, CGTC was required to correct any errors discovered in the file review and report the outcome to the Department as part of CGTC's Program Review Report response.

**CGTC's Response:** The College does not concur with the R2T4 Calculation Errors finding in reference to the one day difference for the College being closed on Labor Day, September 2, 2013.

College had regularly scheduled classes on August 30, 2013, but did not have classes scheduled for Saturday, August 31, 2013; therefore August 31 was the first day of a scheduled break with classes resuming on Tuesday, September 3, 2013. This is a total of three consecutive days, which is below the minimum requirement for days to be excluded from the R2T4 calculation.

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Students #16 and #23 – Funds not returned within the 45 day requirement

The College concurs with the finding. Instructors did not report the unofficial withdrawal of these two students until the end of the term. The College will ensure that Instructors report unofficial student withdrawals immediately as they occur.

The College did not concur with 11 of the 13 R2T4 calculations.

**Final Determination:** CGTC provided the required file review for 2012-2013. The liability from the file review is \$661 in Unsubsidized Direct Loans, \$1,642 in Subsidized Direct Loans and \$8,605.26 in Pell grant funds. The institution processed downward adjustments for the students identified in this finding and *returned* \$661 of Unsubsidized Direct Loans, \$1,642.00 of Subsidized Direct Loans and \$6,781.46 to Pell Grant funds. However, upon conducting the file review, the institution identified \$1,824 in additional Pell Grant funds that are required to be returned for the list of students identified in *Appendix B*. The institution is required to return those funds and must follow the payment instructions in this report. The total amount due for this finding including the COF is \$1,857. The Cost of Funds calculation is included as Appendix G (Late/Unmade Returns/Loans and Non-Loans).

***Finding 5: Ineligible Student/Not Making Satisfactory Academic Progress (SAP)***

**Citation:** 34 C.F.R. § 668.32(f)(4) states that a student is eligible to receive Title IV, HEA program assistance if the student maintains satisfactory progress (SAP) in his or her course of study according to the institution's published standards of satisfactory progress as long as those standards satisfy the provisions of 34 C.F.R. § 668.16 (e).

34 C.F.R. § 668.16, General provisions, states to be eligible for FSA, a student must make satisfactory academic progress. Your school must have a satisfactory academic progress policy that includes both a qualitative (such as the use of cumulative grade point average, or GPA) and a quantitative measure (such as a maximum time frame of 150% for completion) of the student's progress.

**Noncompliance:** The reviewers found several students who were not making SAP.

Student #12 had a cumulative GPA of 1.90 at the end of summer semester 2012 and a cumulative GPA of 1.72 at the end of the fall semester 2012. The student was not making

SAP for the spring semester 2013. There was no documentation in the file to indicate that the student submitted a SAP appeal for the spring 2013 semester.

Student #13 had a cumulative quantitative measure of 55% at the end of the summer quarter 2008 and a cumulative quantitative measure of 60% at the end of the fall quarter 2008. The student failed to make SAP for the fall semester 2012. There was no documentation in the file to indicate the student submitted a SAP appeal and was granted "probation."

Student #25 attended the institution during the following terms; fall quarter 2002, summer quarter 2010 and fall semester 2013. The student had a GPA of "0" fall quarter 2002 and summer quarter 2010. The student was not making SAP in the fall 2013 semester. There was no documentation to indicate the student submitted an SAP appeal.

Student #26 had a GPA of .69 summer quarter 2008, GPA of "0" fall quarter 2009, GPA of 0 winter quarter 2010, GPA of 4.0 spring quarter 2010, GPA of .40 summer quarter 2010, GPA of 0 fall quarter 2010 and GPA of 1.18 summer quarter 2013. The student was not making SAP for the fall semester 2013. There was no documentation to indicate the student submitted a SAP appeal.

**Required Action:** The institution was required to explain its determination of SAP, therefore Title IV eligibility for students #12, 13, 25, and 26.

**CGTC's Response:** For students attending GCTC through summer 2011, the College placed students on a probation status one term after the student was placed on Academic Suspension as determined by the College's academic status policy. (See attached F5.2 Academic Status and SAP policy document). Upon the next term of enrollment in order to complete the probationary term successfully, the student would have to complete all courses with an A, B, C, or S grade for each course attempted. Grades of I or IP did not apply to this standard. If the student received a D, F, or U for any course, the student would be suspended from financial aid until the student brought their progress up to the minimum required standards or filed an appeal and the appeal was approved. Upon successful completion of the probation term, student was placed in a two term recheck period. If at the end of the two-term recheck period the student had not successfully completed the terms, the student was suspended from financial aid until he brought his progress up to the minimum required standards, for filed an appeal which was approved.

For students attending fall 2011 and beyond, the College used the current SAP policy (See attached SAP policy #2)

**Calculations used:** GPA - Cumulative quality points divided by cumulative GPA hours;

Completion rate – Total successfully completed hours divided by the total classes attempted

**Student #12** – The College did not concur. (See attached F5.3 spreadsheets)  
Based on the old prior fall 2011 SAP policy, this student was not placed on Academic Suspension, therefore the student was not subject to a probation SAP term for terms up through spring quarter 2011 and remained eligible for aid. Based on the current SAP policy, our calculations are as follows:

Student did not attend fall semester 2011.

At the completion of spring semester 2012, student had a 2.18 GPA and 73% completion rate;

At the completion of summer semester 2012, student had a 2.08 GPA and 73% completion rate;

At the completion of fall semester 2012, student had a 1.85 GPA and 64% completion rate and was placed on SAP Warning;

At the completion of spring semester 2013, student had a 1.78 GPA and 66% completion rate and was placed on SAP Suspension.

**Student #13** – The College did not concur (See attached F5.4 sheets)

Based on the prior fall 2011 SAP policy, this student was not placed on Academic Suspension any time through term 200802, Fall quarter 2007 and remained eligible for aid.

Student returned to CGTC for the term 201312, fall semester 2012 and completed this term successfully but under the current SAP policy has a cumulative 2.284 GPA and 59.53% completion rate; student is on SAP warning at the completion of this term.

**Student #25** – The College did not concur. (MGTC student prior to fall semester 2013 – See attached F5.5 sheets)

Based on the prior fall 2011 SAP policy, this student was not placed on Academic Suspension any time through fall 2011, summer quarter 2010 and remained eligible for aid.

Student returned to the merged college fall semester 2013. Based on the current SAP policy, student is on SAP warning at the completion of this term.

**Student #26** – The College does concur. The College will return Pell funds in the amount of \$1,303.62 for the term 201412, fall semester 2013.

*Upon reviewing the institution's response and the supporting documentation, the reviewer waived the requirement to conduct the file review for this finding.*

**Final Determination:** CGTC provided appropriate documentation for students #12, 13 and 25. The liability for student #26 for the 2013-2014 award year, is \$1,304 in Federal Pell Grant funds. The COF due on this amount is \$6. The total liability to be remitted for this finding is \$1,310. The COF calculation is included as Appendix H (Ineligible Disbursements/Non-Loan).

**D. Summary of Liabilities**

The total amount calculated as liabilities from the findings in the program review determination is as follows.

**Established Liabilities**

<b>Finding</b>	<b>Due to PELL</b>	<b>COF for FDL</b>	<b>COF for Pell</b>	<b>Total COF</b>	<b>Amount CGTC Returned</b>
2	n/a	\$727	\$1,046	\$1,773	(\$196,149.76) Pell (\$120,403.41) FDL
3	\$1,824	\$4	\$29	\$33	(\$6,781.46) Pell (\$4,395.25) FDL
5	\$1,304	n/a	\$6	\$6	
<b>Total</b>	<b>\$3,128</b>	<b>\$731</b>	<b>\$1,081</b>	<b>\$1,812</b>	
<i>Payable to Department</i>					<b>\$4,940</b>

**E. Payment Instructions**

**Federal Pell Award Adjustments**

The disbursement record for each student identified in findings 3 and 5 must be adjusted in the Common Origination and Disbursement (COD) system based on the recalculated amount. **Adjustments in COD must be completed prior to remitting payment to the Department. Payment cannot be accepted via G5. Once the Department receives**

**payment, the Department will apply the principal payment to the applicable G5 award. The interest will be applied to the general program account.** Because the liability established for these findings are for a closed award year, CGTC must contact

COD School Relations at [codsupport@acs-inc.com](mailto:codsupport@acs-inc.com) or by telephone at 1-800-474-7268 to request extended processing relief before any adjustments can be processed.

Finding	Award Year (AY)	Pell Adjustment
3	2012-2013	\$1,824
5	2013-2014	\$1,303

A copy of the adjustment to each student's COD record must be sent to Alicia Scott **within 45 days of the date of this letter.**

#### **Liabilities Owed to the Department**

CGTC owes to the Department \$4,940. 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: \$4,940  
DUNS: 039497417  
TIN: 586000191  
Program Review Control Number: 201420428534

#### **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. CGTC 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 CGTC'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, CGTC 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 CGTC from the Federal Government. **CGTC may object to the collection by offset only by challenging the existence or amount of the debt.** To challenge the debt, CGTC 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.

#### F. Appendices

Final Program Review Determination  
PRCN #: 201420428534

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Appendix A  
Student Sample

**Confidential - This document contains Personally Identifiable Information**

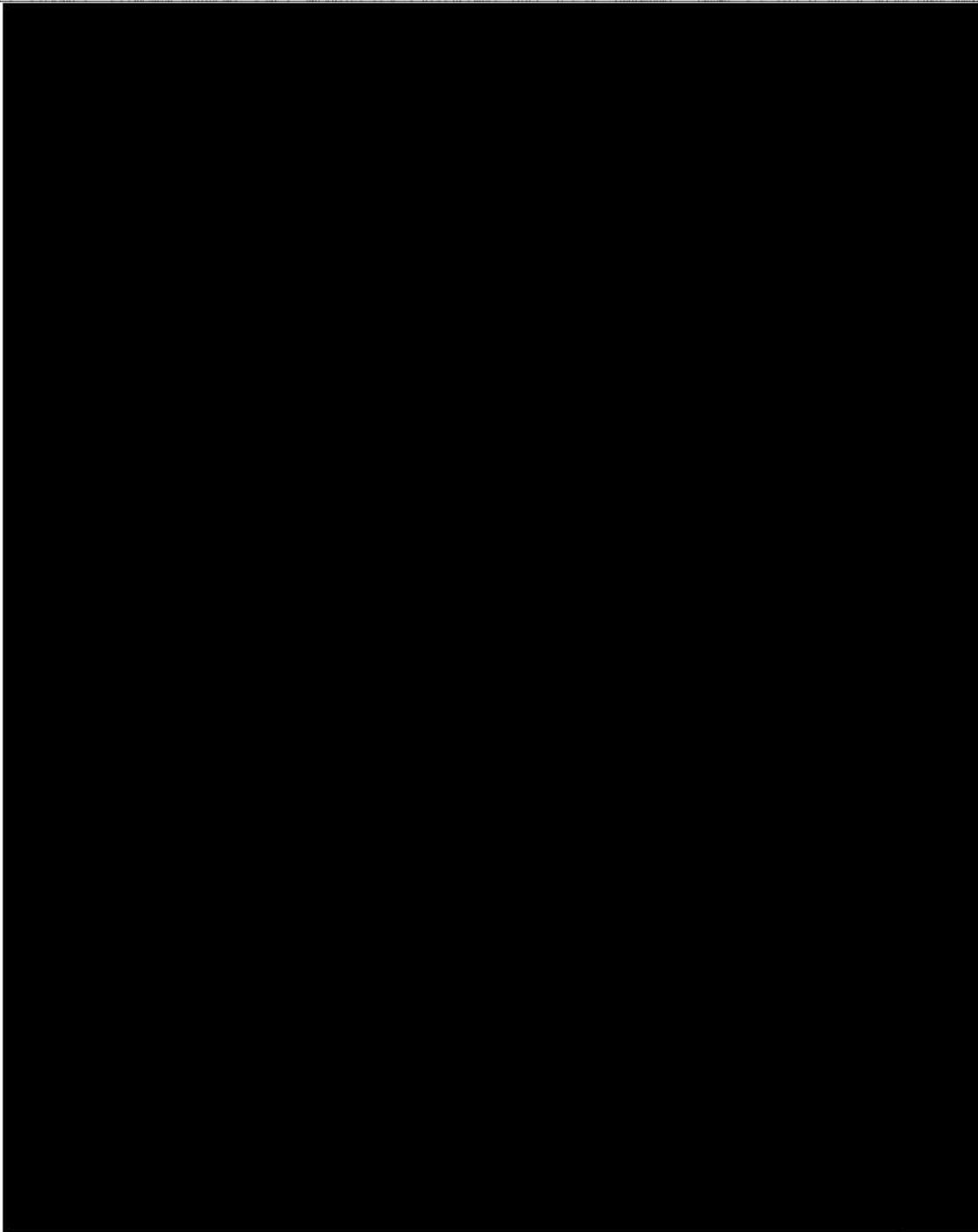
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**Appendix A - Student Sample to the Program Review Report  
Final Program Review Determination**

**School: Central Georgia Technical College**

**OPEID: 00576300**

**PRCN: 201420428534**



### Finding #1 – Lack of Administrative Capability

The College concurs with the reviewers' determination of noncompliance that is considered to demonstrate a lack of administrative capability in administering the Title IV Federal Student Aid Programs for the areas of Return to Title IV (R2T4) (Findings #2 & 4) and failure to verify students last date of attendance for all "F" grades (Finding #2); however, the College does not concur with the determination for Satisfactory Academic Progress (SAP) Policy inadequate (Finding #6); Return to Title IV (R2T4) (Finding #3); inadequate award letters (Finding #13); and not having a procedure in place to check validity of high school diplomas/transcripts (Finding #8). Additional documentation has been included with each of the findings.

A summary of each finding and the concur/not concur responses is shown below:

Finding	College Response
Finding #1 – Lack of Administrative Capability	Concur w/2; not concur w/4 of listed non-compliance items.
Finding #2 – Return of Title IV not made	Concur
Finding #3 – Return to Title IV (R2T4) calculation errors	Concur w/2; not concur w/11 of listed items.
Finding #4 – Return to Title IV (R2T4) Policy inadequate	Concur
Finding #5 – Ineligible student/not making SAP	Concur w/1; not concur w/3 of listed items.
Finding #6 – SAP Policy not adequately developed	Not concur
Finding #7 – Missing documentation of High School Diploma/Transcript	Not concur
Finding #8 – Missing policy/procedure to validate questionable High School Diplomas	Not concur
Finding #9 – Missing or incomplete Admission file	Not concur
Finding #10 – Verification Violation	Concur
Finding #11 – Credit Balance Deficiency	Concur
Finding #12 – Improper origination of direct loan	Not concur
Finding #13 – Borrower not notified timely to cancel all or part of loan disbursement	Not concur
Finding #14 – Over award/financial need/COA exceeded	Not concur
Finding #15 – PELL overpayment/underpayment	N/A – award year closed
Finding #16 – Inaccurate enrollment reporting	Concur w/1; not concur w/11 of listed items.
Finding #17 – Exit Counseling not documented	Not concur
Finding #18 – Inadequate award letters/not updated	Not concur
Finding #19 – No provision to opt out of Pell Book Voucher	Concur

The College has already performed the following items to improve the school's administrative capability:

1. The administrative oversight of the Financial Aid Department has been restructured. See attachments F1.2 Old Org Chart and F1.3 Updated Org Chart. The Directors of Financial Aid now report directly to the Vice President of Administrative Services. This change was done to strengthen the oversight of the Financial Aid Department.
2. An internal audit of our Banner System, focusing on Financial Aid systems and controls, was performed by Technical College System of Georgia personnel to review for gaps within our system and process and to close those gaps.
3. The leadership team of the College has worked to improve the policies and procedures for the entire College. Some of these updated policies and procedures are shown later in the responses to findings.

Going forward, College personnel will continue to monitor policies, procedures and processes to ensure compliance with the Department of Education's statutory or regulatory provisions governing the Title IV, HEA programs.

**Finding #2 – Return of Title IV Not Made**

The College concurs with the finding of Return to Title IV not made.

During July 2013, Central Georgia Technical College received a program review from the Georgia Department of Audits and Accounts (excerpt below). During this audit it was found that unearned Title IV funds were not identified and returned for students who unofficially withdrew from the College.

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Reports were created by the College's IT Department, with assistance from Financial Aid, that provided a list of students who received all Fs, all Ws, and all Ws and Fs for a term. With cooperation from the Financial Aid office, Registrar, and Instructors from Academic Affairs office, the lists were reviewed and last dates of attendance were determined for these students using attendance rosters. Title IV aid awards for these students were adjusted accordingly. For students that a last date of attendance could not be determined, the 50% point of the term was used for the calculation of the Title IV award adjustment. For 2012-13 and fall 2013, CGTC was new to Direct Loan processing and the college returned its portion and the student's portion of unearned loan funds. Beginning Spring of 2014, the college is returning only its portion of Direct Loan fund. For Direct Loan funds that are the responsibility of the student, the student will be responsible for returning those funds according to the terms of the loan agreement.

Spreadsheets for fall 2012, spring 2013, summer 2013, and fall 2013 are enclosed (Attachments F2.2). COD files (Attachment F2.3) are also included to show these funds were returned to the Department of Education.

A copy of the College's unofficial withdrawal policy is attached as F2.4 CGTC Unofficial Withdrawal.

The withdrawal reports and necessary Title IV award adjustments will be processed at the end of each term going forward.

CENTRAL GEORGIA TECHNICAL COLLEGE  
SCHEDULE OF FINDINGS, QUESTIONED COSTS AND OTHER ITEMS  
YEAR ENDED JUNE 30, 2013

FEDERAL AWARD FINDINGS AND QUESTIONED COSTS

FA-835-13-02 Return of Title IV Funds

Compliance Requirement:	Special Tests and Provisions
Internal Control Impact:	Significant Deficiency
Compliance Impact:	Nonmaterial Noncompliance
Federal Awarding Agency:	U. S. Department of Education
CFDA Number and Title:	84.SFA Student Financial Assistance Cluster

**Description:** Unearned Title IV funds were not identified and returned for students who unofficially withdrew from the Technical College.

**Criteria:** 34 CFR 668.22 provides requirements over the treatment of Title IV funds when a student withdraws. The Technical College is required to determine the amount of Title IV grant that the student earned as of the student's withdrawal date when a recipient of a Title IV grant withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance. A refund must be returned to Title IV programs when the total amount of Title IV grant or loan assistance, or both, that the student earned is less than the amount of Title IV grant or loan assistance that was disbursed to the student as of the withdrawal date.

**Condition:** Fifty-nine students who received Federal financial assistance for the Fall 2012 and Spring 2013 semesters and withdrew from the Technical College were selected to determine if refunds were calculated and returned in the correct amount to the proper funding agency and/or student in a timely manner. Our examination revealed the following deficiency:

1. Refund calculations were not performed for 36 students who unofficially withdrew during the Fall 2012 and/or Spring 2013 semesters, which resulted in \$24,372.27 of funds not being returned to the various SFA programs.

**Questioned Cost:** Questioned costs of \$24,372.27, with likely questioned costs of \$547,956.45, were identified for refunds not calculated.

**Cause:** In discussing the condition with Central Georgia Technical College officials, they stated that the finding occurred because the Technical College was relying on professors to report student's attendance. However, there was not a mandated attendance policy in place.

**Effect or Potential Effect:** The SFA Office did not calculate refunds for unofficial withdrawals for the Title IV Federal program.

**Recommendation:** The Technical College should implement policies and procedures to ensure that unofficial withdrawals that received Title IV funds are identified and the required refund calculation is performed. The Technical College should also contact the U. S. Department of Education regarding the resolution of this finding.

CENTRAL GEORGIA TECHNICAL COLLEGE  
SCHEDULE OF FINDINGS, QUESTIONED COSTS AND OTHER ITEMS  
YEAR ENDED JUNE 30, 2013

FEDERAL AWARD FINDINGS AND QUESTIONED COSTS

Views of Responsible Officials and Corrective Action Plans:

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We concur with this finding. The College will review procedures and implement new processes to ensure that student's that unofficially withdraw are reported to Financial Aid. Management will monitor and review these processes to ensure compliance with federal regulations.

Contact Person:	Michelle Siniard
Title:	Vice President of Administrative Services
Telephone:	(478) 218-3330
Email:	msiniard@centralgatech.edu



**Finding #4 – Return to Title IV (R2T4) Policy Inadequate**

The College concurs with finding. See revised policy attachment F4.2 R2T4 Refund Policy.

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## Central Georgia Technical College 00576300 - Financial Aid

### Return to Title IV Policy/ Federal Refund Policy

2013-14 Rev

Title IV funds are awarded to a student under the assumption that the student will attend school for the entire semester for which the aid is awarded. When a student withdraws, the student may no longer be eligible for the full amount of Title IV funds that the student was originally scheduled to receive. If the student withdraws before the 60% point of the term, the student is subject to the Return to Title IV policy requirements set forth by the Department of Education. Any refund owed to a federal financial aid program is the student's responsibility and will appear as a charge on the student's BannerWeb student account. Students will receive notification of this action via an email and an updated billing statement. Students withdrawing after the 60% point of the term will have earned 100% of Title IV funds.

The withdrawal date is the actual date that the student completed the official withdrawal form. If the actual withdrawal date cannot be determined, then the 50% point of the semester will be used.

The amount of Title IV funds earned by the student must be determined. The percentage of completion rate is calculated by dividing the number of days completed in the term by the total number of days in the term. This rate is multiplied by the amount of aid awarded to student to calculate the amount of aid the student earned.

The College will return its portion of the student's "unearned" Title IV funds within 45 days after determining the student has withdrawn resulting in a charge to the student's account. These funds will be returned to the source through G5. The College will return funds to the program from which the student received aid in the following order:

- Unsubsidized Direct Loans
- Subsidized Direct Loans
- Federal Perkins Loan (N/A)
- Direct PLUS Loans
- Federal Pell Grant, for which a return is required
- Federal Supplemental Educational Opportunity Grant (FSEOG), for which a return is required
- TEACH Grant, for which a return is required
- Iraq and Afghanistan Service Grant, for which a return is required

If unearned funds are the result of a Direct Loan, the student will be responsible for returning those funds according to the terms of the loan agreement.

The Title IV aid earned will be used to pay tuition, fees and charges incurred for books and supplies from the bookstore. The student will receive the balance of Title IV funds that remain after these charges are deducted in the form of a refund. If the Title IV funds are not sufficient to pay these institutional charges and any funds already paid to the student, the student will owe this amount to the institution and the student will need to make some type of payment arrangement before the student is allowed to enroll again at the institution.

The College will report any unearned grant and loan funds that are the responsibility of the student as an overpayment to the National Student Loan Service (NSLDS) after the 45<sup>th</sup> day following the date the school sends notification to the student and the student has not repaid the overpayment or made satisfactory arrangements to pay.

# Dropping and Withdrawing From Classes

Central Georgia Technical College requires all faculty to take attendance. Attendance records are used by the College to determine the student's date of withdrawal.

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Through the 3rd day of the term students may drop their courses they registered to take. Dropping a course is done through BannerWeb, the student database system. If you drop your course(s) by the 3rd day you have:

- No academic penalty
- No tuition or fee charges
- No Financial Aid awarded

After the 3rd day of the term students not able to complete a course(s) must complete a Withdrawal Form online through Registrar's office. If you withdraw, be aware:

- You are assigned a W for each course you withdraw.
- Withdrawing from classes can affect your academics (GPA) and your financial aid (Satisfactory Academic Progress).
- Full Tuition and fees based on hours enrolled are charged – you are not given a refund for any tuition & fees according to state policy.
- Financial Aid will be reduced based on the amount of hours in which the student remains enrolled.
- Complete withdrawal from all classes - Title IV Financial Aid will be prorated based on the amount of aid the student earned for the period the student was enrolled. Unearned Title IV aid will be returned in accordance with the College's Return to Title IV/Federal Refund policy.
- The student will be responsible for paying the balance of tuition, fees and book charges not covered by the prorated Title IV and other aid received.
- The student will be responsible for paying any unearned Financial Aid they may have received in the form of a refund.

## Unofficial Withdrawal Policy

Title IV funding regulations require that any student who begins attendance but fails to earn a passing grade in at least one course during a semester and who does not officially withdraw shall be considered as having **unofficially withdrawn** from the College unless it can be documented that the student completed the period of enrollment and earned the grade of "F".

A student who does not earn at least one passing grade during a semester for which Title IV funds were disbursed will have a Return to Title IV calculation performed to determine how much of the Title IV funds were earned. At the completion of each term, the Financial Aid Office (FAO) will, after review of academic records, identify Title IV recipients who have received all grades of "F" or a combination of "F", "W" and "WF" for the semester. The FAO will contact each course instructor to determine the last date of attendance or academic activity for each student identified if such information is not noted on class roster.

The 50% of the semester will be used to calculate the amount of federal funds earned unless it can be determined that the student completed the term at a later date by attendance rosters or an academic activity. If attendance or academic activity beyond the midpoint of the semester can be verified in at least one class and the student began attendance in all classes, the amount of financial aid the student is required to repay will be reduced. If attendance or academic activity beyond the 60% point can be verified in at least one class and the student began attendance in all classes, the student will have earned 100% of Title IV aid disbursed for the semester. Any refund owed to a federal

financial aid program is the student's responsibility and will appear as a charge on the student's BannerWeb student account. Students will receive notification of this action via an email and an updated billing statement.

The College will return its portion of the student's "unearned" Title IV funds in accordance with the College's Return to Title IV/Federal Refund policy.

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## **Finding #5 – Ineligible Student/Not Making Satisfactory Academic Progress**

SAP Policy notes:

For students attending Central Georgia Technical College up through summer 2011, the College processed Satisfactory Academic Progress by placing the student on a probation term status one term after the student was placed on Academic Suspension as determined by the College's academic status policy. (See attached F5.2 Academic Status and SAP policy document). Upon the next term of enrollment in order to complete the probationary term successfully, the student would have to complete all courses with an A, B, C, or S grade for each course attempted. Grades of I or IP did not apply to this standard. If the student received a D, F, or U for any course, the student would be suspended from financial aid until the student brought their progress up to the minimum required standards or filed an appeal and the appeal was approved. Upon successful completion of the probation term, student was placed in a two term recheck period. If at the end of the two term recheck period, the student has not successfully completed the terms, the student was suspended from financial aid until the student brought their progress up to the minimum required standards for filed an appeal and the appeal was approved.

For students attending fall 2011 and beyond, the College uses the current SAP policy (See attached SAP policy #2)

**Calculations used:** GPA - Cumulative quality points divided by cumulative GPA hours;  
Completion rate – Total Successfully completed hours divided by the total classes completed.

**Student #12** – The College does not concur. (See attached F5.3 spreadsheets)

Based on the old prior fall 2011 SAP policy, this student was not placed on Academic Suspension, therefore the student was not subject to a probation SAP term for terms up through 201104, Spring quarter 2011 and remained eligible for aid.

Based on the current SAP policy, our calculations are as follows:

Student did not attend fall semester 2011.

At the completion of spring semester 2012, student had a 2.18 GPA and 73% completion rate;

At the completion of summer semester 2012, student had a 2.08 GPA and 73% completion rate;

At the completion of fall semester 2012, student had a 1.85 GPA and 64% completion rate and was placed on SAP Warning;

At the completion of spring semester 2013, student had a 1.78 GPA and 66% completion rate and was placed on SAP Suspension.

**Student #13** – The College does not concur (See attached F5.4 sheets)

Based on the prior fall 2011 SAP policy, this student was not placed on Academic Suspension any time through term 200802, Fall quarter 2007 and remained eligible for aid.

Student returned to CGTC for the term 201312, fall semester 2012 and completed this term successfully but under the current SAP policy has a cumulative 2.284 GPA and 59.53% completion rate; student is on SAP warning at the completion of this term.

**Student #25** – The College does not concur. (MGTC student prior to 201412 – See attached F5.5 sheets)

Based on the prior fall 2011 SAP policy, this student was not placed on Academic Suspension any time through term 201101, Summer quarter 2010 and remained eligible for aid.

Student returned to the merged college 201412, fall semester 2013. Based on the current SAP policy, student is on SAP warning at the completion of this term.

**Student #26** – The College does concur. The College will return Pell funds in the amount of \$1,303.62 for the term 201412, fall semester 2013.

Since the College does not concur with 3 of the 4 stated findings, the College does not agree that extensive errors exist and a review of student files is not warranted. If the Department disagrees with the College based upon the additional documentation provided, the school will perform a review of student files.

Finding #5

2010-2011 CGTC Catalog

### APPEALING A GRADE

A student may elect to appeal the assignment of the grade of "F" due to a nonacademic hardship. To appeal the grade of "F", a student should submit a written appeal to the Vice President of Student Affairs within 10 days of the grade being assigned.

Appeals will only be reviewed when:

- \* Submitted with documentation of the hardship
- \* The factors justifying the hardship are nonacademic and developed after midterm
- \* Attendance and course work met satisfactory academic criteria at the point of hardship

### ACADEMIC STATUS

A quarterly Grade Point Average (GPA) will be calculated at the end of each quarter based on the letter grades A, B, C, D, or F, and the credit hours carried. Grade point averages will be rounded to the nearest hundredth in determining the quarterly and the cumulative GPA. The following will establish status:

#### Good Standing

A quarterly grade point average of 2.00 or higher and satisfactory completion of at least 50% of course work attempted for the quarter is required for satisfactory progress.

#### Academic Warning

A student who earns a quarterly grade point average below a 2.00 or fails to successfully complete at least 50% of the course work attempted for the quarter will be placed on academic warning the next quarter of enrollment.

#### Academic Probation

A student who earns a quarterly grade point average below a 2.00 or fails to successfully complete at least 50% of the course work attempted while enrolled on academic warning will be placed on academic probation for the next quarter of enrollment.

#### Academic Suspension

A student who earns a quarterly grade point average below a 2.00 or fails to successfully complete at least 50% of the course work attempted for the quarter while enrolled on academic probation will be suspended for one quarter. A second academic suspension will result in a suspension for one year (four quarters). A third suspension will result in a five-year suspension from the

College. Also, a student who withdraws from all courses for two consecutive quarters will be suspended for one academic year (4 quarters). Upon readmission, a student will be placed on academic probation for their next quarter enrolled.

### ACADEMIC REINSTATEMENT

To be reinstated, a student must submit a readmission application. For the first suspension, students will be eligible to reapply for admission after one quarter. For a second suspension, students will be eligible to reapply for admission after one year (four quarters). For a third suspension, students will be eligible to reapply after 5 years.

*NOTE: Students enrolled in Health Technology programs should refer to the specific academic requirements for the Health Technology programs in the Health Technology section of the CGTC Catalog.*

### PRESIDENT'S LIST

Students who earn a quarterly grade point average of 3.50 or higher with an earned course load of at least 12 credit hours for the quarter will earn recognition on the President's List for the quarter.

### GRADE POINT AVERAGE COMPUTATION

Grade point average (GPA) is computed by dividing the total number of grade points earned by the total number of credit hours attempted. To determine the total grade point for a specific course, multiply the grade value by the number of credit hours for the course. For example, if you take a 5 credit hour course and receive a grade of "A", your total grade points would be 20 (5 credit hours x 4 grade points = 20).

To figure your GPA for specific courses total the number of grade points for each course and then divide by the total number of credit hours.

### GRADE POINTS

- A = 4 grade points
- B = 3 grade points
- C = 2 grade points
- D = 1 grade points
- F = 0 grade points

EXAMPLE:

Course	Grade	Grade Points		Credit Hours		Total Grade Points
English 1010	B	3	X	5	X	15
Mathematics 1012	C	2	X	5	X	10
SCT 100	A	4	X	3	X	12
Total Credits				13		
Total Grade Points Earned						37

To find the Grade Point Average: 37 (total grade points earned) is divided by 13 (total number of credit hours) = 2.84 GPA.

#### QUARTERLY GRADE POINT AVERAGE

The quarterly grade point average is the average of all grades earned in a single quarter.

#### CUMULATIVE GRADE POINT AVERAGE

The cumulative grade point average is the average of all grades earned in credit hour courses at Central Georgia Technical College. (Learning Support courses are not included in this calculation as they are for institutional credit only.) This average is calculated by dividing the number of hours in all courses attempted in which a grade of A, B, C, D, or F has been received into the number of grade points earned. The cumulative grade point average will be recorded on the student's permanent record.

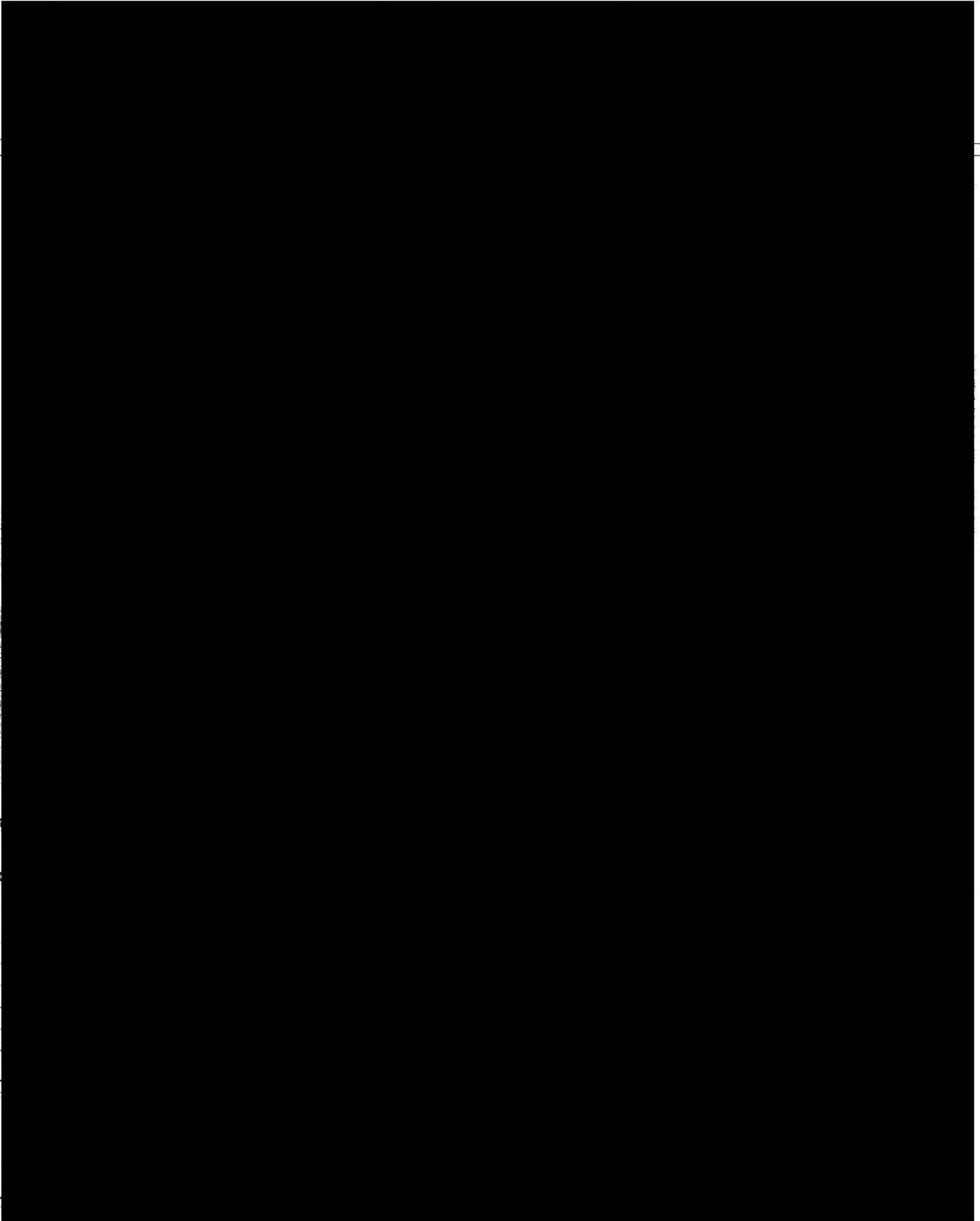
#### GRADUATION GRADE POINT AVERAGE

The Graduation Grade Point Average is calculated only on those courses required for graduation. When a course is taken more than once, the final grade will be used in calculating the grade point average for graduation. A 2.00 grade point average is required for graduation.

#### GRADUATION INFORMATION

In order to be eligible for a degree, diploma, or technical certificate, a student must complete each required course of the prescribed program of study with a grade of C or higher and have either a 2.00 cumulative grade point average or a 2.00 graduation grade point average. For elective courses, a D is acceptable.

# Academic History



Finding #5  
#12 GPA CALCULATION WORKSHEET

QTR / SEMESTER	COURSE	GRADE	ATT HRS	GPA HRS	QUALITY PTS	CUM ATT	CUM GPA HRS	CUM GPA
201103	ENG 1010	C	3.33	3.33	6.66	3.33	3.33	
201103	MAT 1012	F	3.33	3.33	0.00	3.33	3.33	
201103	EMP 1000	C	2.00	2.00	4.00	2.00	2.00	1.231
201104	COS 100	A	3.33	3.33	13.32	3.33	3.33	
201104	COS 103	A	2.00	2.00	8.00	2.00	2.00	
201104	SCT 100	C	2.00	2.00	4.00	2.00	2.00	
201104	COL 150	A	3.33	3.33	13.32	3.33	3.33	2.552
201201	COS 108	F	2.00	2.00	0.00	2.00	2.00	
201201	COS 101	F	2.67	2.67	0.00	2.67	2.67	
201201	MAT 1012	F	3.33	3.33	0.00	3.33	3.33	1.805
201214	MATH 1012	C	3.00	3.00	6.00	3.00	3.00	
201214	COSM 1010	B	3.00	3.00	9.00	3.00	3.00	
201214	COSM 1020	A	2.00	2.00	8.00	2.00	2.00	
201214	COSM 1030	B	3.00	3.00	9.00	3.00	3.00	
201214	COSM 1040	B	3.00	3.00	9.00	3.00	3.00	2.185
201216	COSM 1050	B	3.00	3.00	9.00	3.00	3.00	
201216	COSM 1060	C	3.00	3.00	6.00	3.00	3.00	
201216	COSM 1120	C	3.00	3.00	6.00	3.00	3.00	
201216	BUSN 1100	F	3.00	3.00	0.00	3.00	3.00	2.087
201312	COMP 1000	F	3.00	3.00	0.00	3.00	3.00	
201312	COLL 1000	F	2.00	2.00	0.00	2.00	2.00	
201312	COSM 1070	C	3.00	3.00	6.00	3.00	3.00	
201312	COSM 1080	D	4.00	4.00	4.00	4.00	4.00	1.857
201314	COSM 1090	C	4.00	4.00	8.00	4.00	4.00	
201314	COSM 1100	C	4.00	4.00	8.00	4.00	4.00	
201314	COSM 1110	C	4.00	4.00	8.00	4.00	4.00	
201314	COSM 1080	F	4.00	4.00	0.00	4.00	4.00	
			<b>81.32</b>	<b>81.32</b>	<b>145.30</b>	<b>81.32</b>	<b>81.32</b>	<b>1.787</b>

62%

83%

59%

73%

73%

W 49%

Susp 66%

#12

Finding #5



UNSUCCESSFUL  
Class/Terr Hours

Current Completion %

72.58% GPA

201103 ENG 1010 FUNDAM  
ENTALS  
OF  
ENGLISH I

3.33 C 2

201103	MAT 1012	FOUNDAT IONS OF MATHEM ATICS	3.33	F 1
201201	COS 108	PERMANE NT WAVING/ RELAXING	2	F 0
201201	COS 101	INTRO PERM WAVING/ RELAXING	2.67	F 2
201201	MAT 1012	FOUNDAT IONS OF MATHEM ATICS	3.33	F 0

201103 EMP 1000 INTER  
REL/PROF  
DEV

2 C 2

If taking and pass....

Completion %

201104 COS 100 INTRO TO  
COSMETO  
LOGY  
THEORY

3.33 A 2

201104 COS 103 INTRO TO  
SKIN/SCA  
LP/HAIR

2 A 2

201104 SCT 100 INTRODU  
CTION TO  
MICROCO  
MPUTERS

2 C 2

11.33

201104 COL 150 ACADEMI  
C  
SURVIVAL  
SKILLS

3.33 A 2

201214 MATH  
1012 FOUNDAT  
IONS OF  
MATHEM  
ATICS

3 C 2

201214 COSM  
1010 CHEMICA  
L  
TEXTURE  
SERVICES

3 B 2

201214 COSM  
1020 HAIR  
CARE AND  
TREATME  
NT

2 A 2

201214 COSM  
1030 HAIRCUTT  
ING

3 B 2

201214 COSM  
1040 STYLING

3 B 2

29.99

# #12 Finding #5



## UNSUCCESSFUL Class/Term Hours

Current Completion 73.12% GPA

If taking and pass.... Completion %

201103	ENG 1010	FUNDAM ENTALS OF ENGLISH I	3.33 C 2
201103	EMP 1000	INTER REL/PROF DEV	2 C 2
201104	COS 100	INTRO TO COSMETO LOGY THEORY	3.33 A 2
201104	COS 103	INTRO TO SKIN/SCA LP/HAIR	2 A 2
201104	SCT 100	INTRODU CTION TO MICROCO MPUTERS	2 C 2
201104	COL 150	ACADEMI C SURVIVAL SKILLS	3.33 A 2
201214	MATH 1012	FOUNDAT IONS OF MATHEM ATICS	3 C 2
201214	COSM 1010	CHEMICA L TEXTURE SERVICES	3 B 2
201214	COSM 1020	HAIR CARE AND TREATME NT	2 A 2
201214	COSM 1030	HAIRCUTT ING	3 B 2
201214	COSM 1040	STYLING	3 B 2
201216	COSM 1050	HAIR COLOR	3 B 2
201216	COSM 1060	FUNDAM ENTALS OF SKIN CARE	3 C 2
201216	COSM 1120	SALON MANAGE MENT	3 C 2

38.99

201103	MAT 1012	FOUNDAT IONS OF MATHEM ATICS	3.33 F 1
201201	COS 108	PERMANE NT WAVING/ RELAXING	2 F 0
201201	COS 101	INTRO PERM WAVING/ RELAXING	2.67 F 2
201201	MAT 1012	FOUNDAT IONS OF MATHEM ATICS	3.33 F 0
201216	BUSN 1100	INTRODU CTION TO KEYBOAR DING	3 F 0

14.33

#12 Finding #5



UNSUCCESSFUL  
Class/Terr Hours

Current Completion % 64.28% GPA

If taking and pass... Completion %

201103 ENG 1010 FUNDAM  
ENTALS  
OF  
ENGLISH I 3.33 C 2

201103 EMP.1000.REL/PROF  
DEV 2 C 2

201104 COS 100 INTRO TO  
COSMETO  
LOGY  
THEORY 3.33 A 2

201104 COS 103 INTRO TO  
SKIN/SCA  
LP/HAIR 2 A 2

201104 SCT 100 INTRODU  
CTION TO  
MICROCO  
MPUTERS 2 C 2

201104 COL 150 ACADEMI  
C  
SURVIVAL  
SKILLS 3.33 A 2

201214 MATH  
1012 FUNDAT  
IONS OF  
MATHEM  
ATICS 3 C 2

201214 COSM  
1010 CHEMICA  
L  
TEXTURE  
SERVICES 3 B 2

201214 COSM  
1020 HAIR  
CARE AND  
TREATME  
NT 2 A 2

201214 COSM  
1030 HAIRCUTT  
ING 3 B 2

201214 COSM  
1040 STYLING 3 B 2

201216 COSM  
1050 HAIR  
COLOR 3 B 2

201216 COSM  
1060 FUNDAM  
ENTALS  
OF SKIN  
CARE 3 C 2

201216 COSM  
1120 SALON  
MANAGE  
MENT 3 C 2

201312 COSM  
1070 NAIL  
CARE&AD  
VANCED  
TECHNIQ  
U 3 C 2

201103	MAT 1012	FOUNDAT IONS OF MATHEM ATICS	3.33	F 1
201201	COS 108	PERMANE NT WAVING/ RELAXING	2.67	F 0
201201	COS 101	INTRO PERM WAVING/ RELAXING	2.67	F 2
201201	MAT 1012	FOUNDAT IONS OF MATHEM ATICS	3.33	F 0
201216	BUSN 1100	INTRODU CTION TO KEYBOAR DING	3	F 0
201312	COMP 1000	INTRODU CTION TO COMPUTE RS	3	F 0
201312	COLL 1000	COLL SUCCESS & SURVIVAL SKILLS	2	F 0
201312	COSM 1080	COSMETO LOGY PRACTICU M I	4	D 2

23.33

41.99

#12

Finding #5



UNSUCCESSFUL  
Class/Term Hours

Current Completion % 66.39% GPA

If taking and pass... Completion %

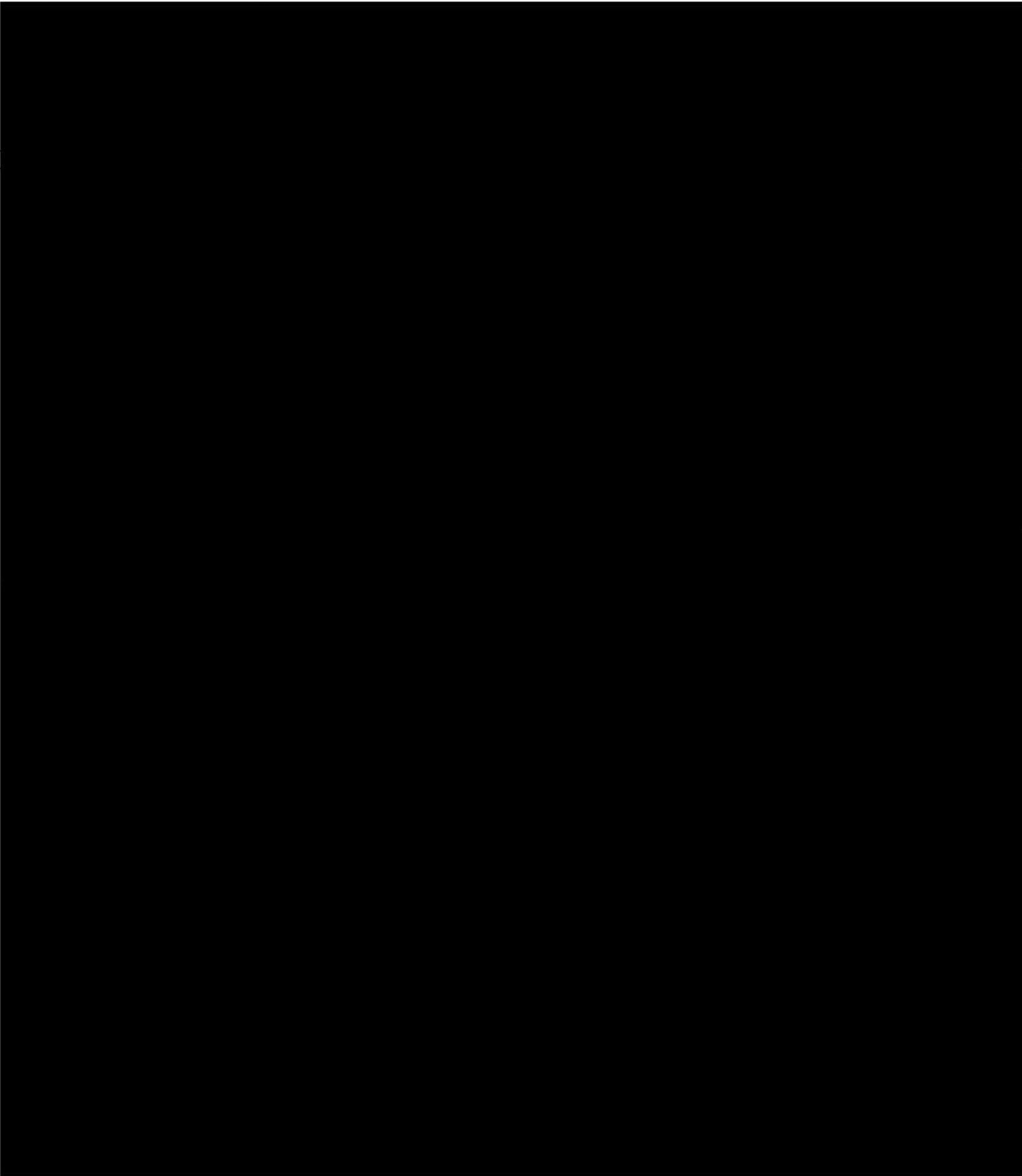
201103	ENG 1010	FUNDAMENTALS OF ENGLISH I	3.33	C 2
201103	EMP 1000	INTER REL/PROF DEV	2	C 2
201104	COS 100	INTRO TO COSMETOLOGY THEORY	3.33	A 2
201104	COS 103	INTRO TO SKIN/SCALP/HAIR	2	A 2
201104	SCT 100	INTRODUCTION TO MICROCOMPUTERS	2	C 2
201104	COL 150	ACADEMIC SURVIVAL SKILLS	3.33	A 2
201214	MATH 1012	FOUNDATIONS OF MATHEMATICS	3	C 2
201214	COSM 1010	CHEMICAL TEXTURE SERVICES	3	B 2
201214	COSM 1020	HAIR CARE AND TREATMENT	2	A 2
201214	COSM 1030	HAIRCUTTING	3	B 2
201214	COSM 1040	STYLING	3	B 2
201216	COSM 1050	HAIR COLOR	3	B 2
201216	COSM 1060	FUNDAMENTALS OF SKIN CARE	3	C 2
201216	COSM 1120	SALON MANAGEMENT	3	C 2
201312	COSM 1070	NAIL CARE & ADVANCED TECHNIQUE	3	C 2
201314	COSM 1090	COSMETOLOGY PRACTICUM II	4	C 2
201314	COSM 1100	COSMETOLOGY PRACTICUM III	4	C 1
201314	COSM 1110	COSMETOLOGY PRACTICUM IV	4	C 2

201103	MAT 1012	FOUNDATIONS OF MATHEMATICS	3.33	F 1
201201	COS 108	PERMANENT WAVING/RELAXING	2	F 0
201201	COS 101	INTRO PERM WAVING/RELAXING	2.67	F 2
201202	MAT 1012	FOUNDATIONS OF MATHEMATICS	3.33	F 0
201216	BUSH 1100	INTRODUCTION TO KEYBOARDING	3	F 0
201312	COMP 1000	INTRODUCTION TO COMPUTERS	3	F 0
201312	COL 1000	COLL SUCCESS & SURVIVAL SKILLS	2	F 0
201312	COSM 1080	COSMETOLOGY PRACTICUM I	4	D 2
201314	COSM 1080	COSMETOLOGY PRACTICUM I	4	F 0

27.93

53.99

## Academic History



#13

Finding #5



UNSUCCESSFUL  
Class/Term Hours

		200202 MAT 097	MATH III	0 S	200203 MKT 101	PRINCIPLES OF MANAGEMENT	3.33 W
Current Completion %	59.53%						

		200202 ENG 097	ENGLISH III	0 S B	200203 MSD 107	TRAINING & PERFORMANCE EVAL	3.33 W
--	--	----------------	-------------	-------	----------------	-----------------------------------	--------

If taking and pass...	Completion %						
		200202 RDG 097	READING III	0 S	200203 MSD 104	PERSONNEL ADMIN FOR SUPV	3.33 W
1	60.24%	200204 COS 100	INTRO TO COSMETOLOGY THEORY	3.33 C A	200204 SCT 100	INTRODUCTION TO MICROCOMPUTER S	2.0 B
2	60.93%	200204 MAT 100	BASIC MATHEMATICS	2 B B	200301 ENG 101	ENGLISH	3.33 W
3	61.59%	200204 COS 103	INTRO TO SKIN/SCALP/HAIR	1.33 C A	200301 COS 109	HAIR COLOR	4 F 1
4	62.23%	200204 EMP 100	INTER REL/PROF DEV	2 C B	200802 PSY 101	PSYCHOLOGY	3.33 D 1
5	62.85%	200301 COS 101	INTRO PERM WAVING/RELAXIN G	1.33 B 1			22.65
6	63.45%	200301 COS 105	INTRO TO SHAMPOOING/STY LING	2.67 C 1			
7	64.03%	200801 ENG 101	ENGLISH GENERAL	3.33 B 2			
8	64.59%	200801 MAT 101	MATHEMATICS	3.33 A 3			
9	65.14%	200802 AHS 109	MED TERMINLGY FOR AHS	2 C 2			
10	65.67%	201312 ECCE 1103	CHILD GROWTH AND DEVELOP	3 C 2			
11	65.18%	201312 ECCE 1105	HEALTH, SAFETY AND NUTRITION	3 B 2			
12	66.68%	201312 ECCE 1101	INTRO TO EARLY CHILDHOOD CARE	3 C 2			
13	67.16%	201312 PSYC 1010	BASIC PSYCHOLOGY	3 C 2			
14	67.63%			33.32			
15	68.09%						
16	68.53%						

Finding #5  
#13

GPA CALCULATION WORKSHEET

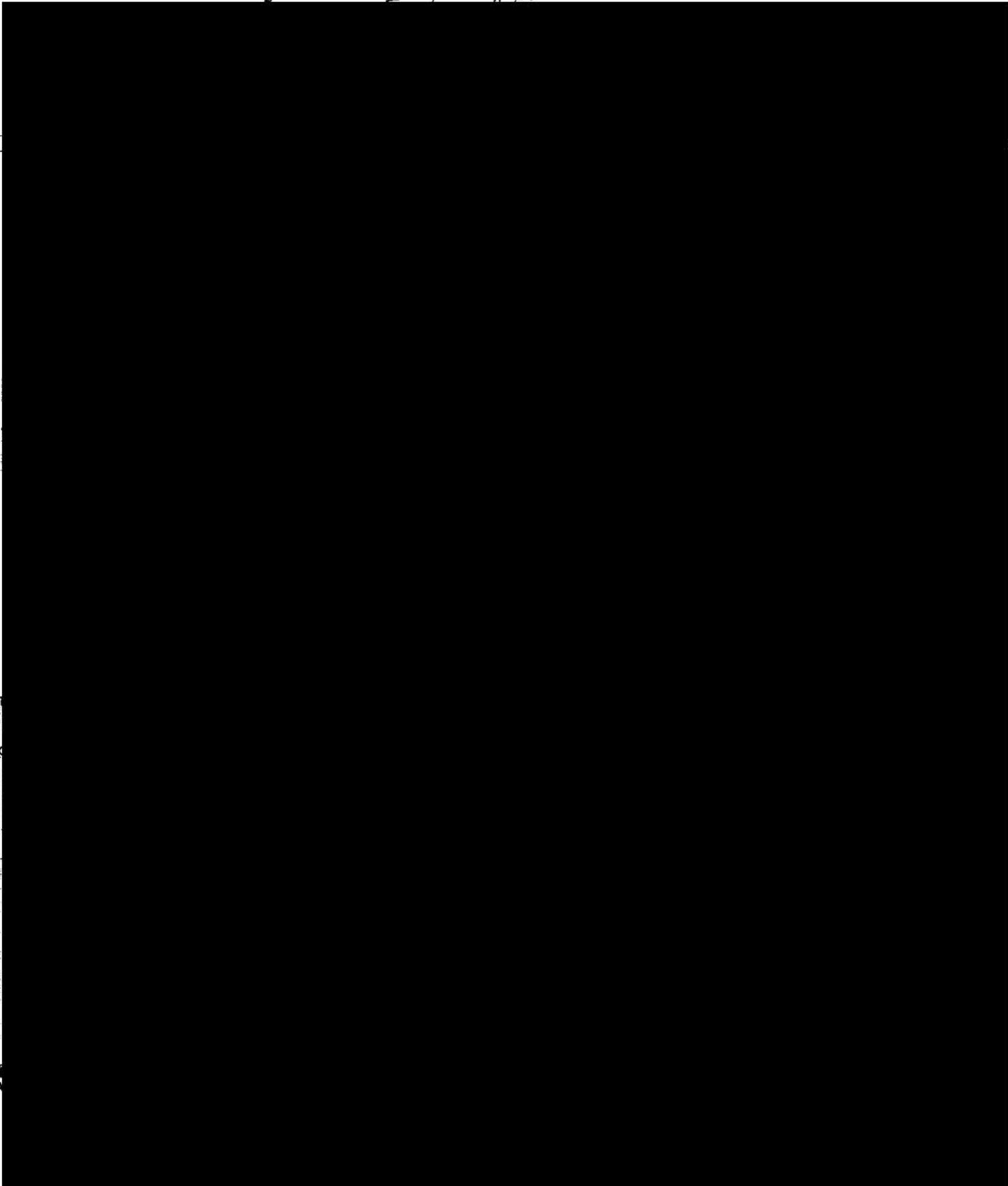
			ATT	GPA	QUALITY	CUM	CUM	
QTR								
/SEMESTER	COURSE	GRADE	HRS	HRS	PTS	ATT	GPA HRS	GPA
200202	MAT 097	0	0.00	0.00	0.00	0.00	0.00	
200202	ENG 097	0	0.00	0.00	0.00	0.00	0.00	
200202	RDG 097	0	0.00	0.00	0.00	0.00	0.00	0.000
200203	MKT 101	W	3.33	0.00	0.00	3.33	0.00	
200203	MSD 107	W	3.33	0.00	0.00	3.33	0.00	
200203	MSD 104	W	3.33	0.00	0.00	3.33	0.00	0.000
200204	COS 100	C	3.33	3.33	6.66	3.33	3.33	
200204	MAT 100	B	2.00	2.00	6.00	2.00	2.00	
200204	COS 103	C	1.33	1.33	2.66	1.33	1.33	
200204	SCT 100	D	2.00	2.00	2.00	2.00	2.00	
200204	EMP 100	C	2.00	2.00	4.00	2.00	2.00	2.000
200301	COS 101	B	1.33	1.33	3.99	1.33	1.33	
200301	COS 105	C	2.67	2.67	5.34	2.67	2.67	
200301	ENG 101	W	3.33	0.00	0.00	3.33	0.00	
200301	COS 109	F	4.00	0.00	0.00	4.00	0.00	2.091
200801	ENG 101	B	3.33	3.33	9.99	3.33	3.33	
200801	MAT 101	A	3.33	3.33	13.32	3.33	3.33	2.531
200802	PSY 101	D	3.33	3.33	3.33	3.33	3.33	
200802	AHS 109	C	2.00	2.00	4.00	2.00	2.00	2.300
201312	ECCE 1103	C	3.00	3.00	6.00	3.00	3.00	
201312	ECCE 1105	B	3.00	3.00	9.00	3.00	3.00	
201312	ECCE 1101	C	3.00	3.00	6.00	3.00	3.00	
201312	PSYC 1010	C	3.00	3.00	6.00	3.00	3.00	
			<b>0.00</b>	<b>0.00</b>	<b>88.29</b>	<b>55.97</b>	<b>38.65</b>	<b>2.284</b>

59%  
Warning

**\*THIS RECORD IS CONFIDENTIAL\***

[Central Georgia Technical College](#) • [FacFusion](#) • [Student Menu](#)

## Academic History



Finding #5  
#25

17 Term Sequence Course History - SHATERM 2.A (COIG) 14 JUL 2014 04:12 PM

Confidential

ID: [REDACTED] Course Level Codes by Person: 50 Start Term: 201414

Current Standing Term GPA and Course Detail Information

Current Standing

First Term Attended: 200802  
 Last Term Attended: 201412  
 Academic Standing: AS Academic Suspension  
 Academic Standing Override:   
 Progress Evaluation:   
 Progress Evaluation Override:   
 Combined Academic Standing Override:   
 Combined Academic Standing:

	Attempted Hours	Passed Hours	Earned Hours	GPA Hours	Quality Points	GPA
Institution:	26.660	.000	.000	11.000	.00	.00
Transfer:	.000	.000	.000	.000	.00	.00
Overall:	26.660	.000	.000	11.000	.00	.00

**Finding #7 – Missing Documentation of High School Diploma/Transcript**

The College does not concur with this finding.

Student #16: Attachment F7.2 Student #16 GED shows that the College received a copy of the student's GED on 7/22/2013 and is a part of the student's digital file.

Student #20: Attachment F7.3 Student #20 Transcript shows that the College received a copy of the student's high school transcript on 8/1/2013 and is a part of the student's digital file.

---

## Finding #8 – Missing Policy/Procedure to Validate Questionable High School Diploma

The College does not concur.

Extracted from Technical College System of Georgia Policy V.B.3 (Residency):

A General Educational Development (GED) diploma or high school diploma (verified by an official transcript including graduation date and diploma type) will be required for admission to the Technical College unless otherwise specified by the programs standards. Home school students may follow an alternative path for admission described below. High school diplomas from unaccredited institutions, Certificates of Attendance or special education diplomas are not recognized for admission purposes. Students with diplomas from secondary schools located outside the United States must have their transcripts evaluated for equivalency by an approved outside evaluation organization.

In order to be accepted by a Technical College, the applicant must have been awarded a high school diploma from a secondary school that is on the TCSG approved accreditation agency list. Graduates of unaccredited high schools must obtain a GED diploma.

Extracted from Central Georgia Technical College Policy V.B.1. Admissions

- Paragraph C2 (Admissions Requirements – Education) reads:
  - a. A high school diploma (verified by an official transcript including graduation date and diploma type) or GED is required for admission to most programs at Central Georgia Technical College. Certificates of Attendance or special education diplomas are not recognized for admission purposes.
  - b. Students with diplomas from secondary schools located outside the United States must have their transcripts evaluated for equivalency by an approved outside evaluation organization.
- Paragraph E (Documentation of Secondary and Post-Secondary Education):

It is the responsibility of students to provide Central Georgia Technical College with a copy of their high school or GED diploma or transcripts. Transcripts from other postsecondary schools attended are also required in order to receive transfer credit and for financial aid purposes.

Full details of policies are attached in F8.2 Admissions Requirements.

**Finding #9 – Missing or Incomplete Admission File**

The College does not concur with this finding. Attachment F9.2.Admission Application shows the original Application for Admission for student #25. This application was signed on 9/24/2002, when the student originally applied for admission to the college, and was located in the original admission file.

---

**Finding #11 – Credit Balance Deficiency**

The College concurs with finding. See current policy (attachment F11.2) and updated catalog at [http://www.centralgatech.edu/catalog/section4/financial\\_information.htm#financial\\_aid\\_refund](http://www.centralgatech.edu/catalog/section4/financial_information.htm#financial_aid_refund)

---

**Finding #12 – Improper Origination of Direct Loan**

The college does not concur with this finding.

Student # 18 is not currently enrolled at CGTC. Based on the school's determination, the student was admitted as a first-year student in his program and was eligible for \$3500 sub loan.

---

**\*\*Note\*\* 34 CFR 685-203 Loan limits.**

(a) *Direct Subsidized Loans.* (1) In the case of an undergraduate student who has not successfully completed the first year of a program of undergraduate education, the total amount the student may borrow for any academic year of study under the Direct Subsidized Loan Program may not exceed the following:

(i) \$3,500 for a program of study of at least a full academic year in length.

College's response to the auditor's statement that the college discontinue the practice of requiring students to complete a supplementary Student Loan Packet in order to be awarded a Federal Direct Loan.

The College requires that all students complete a Free Application for Federal Student Aid (FAFSA) to apply for all types of financial aid. The Student Loan Packet that the College requires the student to receive is not an additional application; it is used strictly for Default Prevention Awareness as part of the College's Default Prevention Plan. In this process, the College strives to make the student aware of the consequences of student loan debt, before they get into debt if they are a first time borrower or further into debt if they have received loans at another institution. Technical College tuition/COA is extremely low (Tuition currently \$85.00 per credit hour/COA \$16,488) compared to other postsecondary institutions and CGTC, through the loan session and loan packet distribution, works diligently to educate students of these differences and the fact that they have the choice to borrow only what they need in order to assist them in making a decision that may affect their future.

### **Finding #13 – Borrower Not Notified timely To Cancel All or Part of Loan Disbursement**

The College does not concur with this finding.

As part of the Direct Loan setup in COD, the College chose the option for COD to print and send disclosure statements to the students. The College may generate these notices as a courtesy to a student if the student claims they did not receive the disclosure statement from COD.

---

See below COD Technical Reference Guide and print screens from COD School Options Information for CGTC. See COD sample disclosure letter in attachment F.13.2.

From COD Technical Reference:

#### ***Generating Disclosure Statements***

**Disclosure Statements are generated for subsidized, unsubsidized and PLUS loans. In November 2012, the Disclosure Statements for Direct Subsidized/Unsubsidized Loans includes an MPN addendum regarding the elimination of interest subsidy during the grace period for Direct Subsidized Loans. Business Rules**

1. Disclosure Statements are generated for all loan types (Subsidized, Unsubsidized and PLUS loans).
2. Disclosure Statement Print Code is a data element on the Common Record indicating whether the school or COD sends the Disclosure Statement.
3. The valid values for the Disclosure Statement Print Code are:

Y	COD prints and sends to borrower
R	COD reprint
S	School Prints and Sends to Borrower



**Finding #15 – Overpayment/Underpayment**

Student #5 The 2012/13 award year has closed therefore no further actions were required. The College will enforce awarding policies and procedures to ensure this does not reoccur.

---

**Finding #16 – Inaccurate Enrollment Reporting**

The College does not concur with the reviewer's findings on students #6, 7, 8, 9, 19, 21, 25, 26, 28, 29, and 30. The College does concur with the finding on student #18.

Since the error rate has decreased from 12 to 1 based upon additional documentation below, the school did not conduct a file review for all students; however, if the Department does not agree with the additional documentation, the College will conduct the review.

Due to consolidation of Central Ga Technical College and Middle Georgia Technical College on July 1, 2013, there were delays in reporting of student enrollment for summer and fall of 2013. The data center at Technical College System of Georgia was in the process of merging the MGTC banner system into the CGTC banner system, which caused both systems to be unavailable to upload information to IPEDS. The College is currently working on a process to expedite Withdrawal Forms.

Student Number	Response – See attached F16.2 Inaccurate Enrollment Report for system justifications
#6 08/20/2012- DISAGREE  10/7/2013- DISAGREE	Student #6 was enrolled half time on 06/14/2012 which was summer semester. For the dates of 8/20/2012 she was enrolled full-time (14 credit hours) Withdrawal Information in Banner is correct but the data center may have reported incorrect dates due to merging of banner systems.  Student status as of 05/13/2013 which was summer semester 2013 was withdrawn. However for Fall semester (10/7/2013) she was enrolled for 9 credit hours which is a status of half-time. Withdrawal Information in Banner is correct but the data center may have reported incorrect dates due to merging of banner systems.
#7 - DISAGREE	Student completed his program at the end of the summer semester on July 31, 2013. On 10/7/2013 which was Fall 201412, the student was not enrolled. Information in Banner is correct. Report from data center does not show any enrollment/withdrawal information on this student for that date which was in the fall semester (201412).
#8 - DISAGREE	Student completed program 5/2/2013. Late report status due to merging of banner systems. On 9/10/2013 student was not enrolled.
#9- DISAGREE STATUS CORRECT	Student was enrolled for 9 hours on 6/11/2013(summer 201316) and enrolled for 9 hours on 10/7/2013(Fall 201412). Status reported of Half Time was correct for both dates.

<b>#18-AGREE</b>	Student was registered for fall semester (201412) for 16 credit hours which ended on 12/12/2013. He completed a withdrawal form for 2 classes. The form was not processed correctly and the student status should not have been withdrawn because he had two classes remaining.
<b>#19 -DISAGREE</b>	Information in Banner shows the student effective withdrawal date was 09/05/2013. The information was incorrectly reported by data center as 09/13/2013 due to merging of Banner systems.
<b>#21-DISAGREE</b>	Student effective withdrawal date was 01/15/2014. Information in Banner System is correct. Data Center reported an Incorrect date of 01/27/2014.
<b>#25 - DISAGREE</b>	Student effective withdrawal date was 09/03/2013. Incorrect date of 09/13/2013 reported from data center is due to merging of the two Banner systems.
<b>#26-DISAGREE</b>	Student effective withdrawal date was 10/01/2013. Incorrect date of 10/11/2013 reported from data center is due to merging of the two Banner systems.
<b>#28-DISAGREE</b>	Student effective withdrawal date was 10/16/2013. Incorrect date of 10/23/2013 reported from data center is due to merging of the two banner systems.
<b>#29-DISAGREE</b>	Student effective withdrawal date was 1/22/2014. Incorrect date of 1/31/2014 reported by data center was due to merging of two banner systems.
<b>#30-DISAGREE</b>	Student effective withdrawal date was 8/26/2013. The report has a certification date of 3/10/2013. The student was enrolled Fall 2012 which ended 12/12/2012. She was pre-registered for Spring 2013(201314)was listed as a No Show. She was not enrolled for summer 2013. She pre-registered for Fall 2013 (201412) and completed a withdrawal form 08//8/26/2013. Date incorrectly reported by the data center was 09/16/2013 was due to merging of the two banner systems.

**Finding #17 – Exit Counseling Not Documented**

The College does not concur with this finding.

The College documented a loan exit packet was mailed out to this student on February 27, 2014. R2T4 was processed for this student on February 6, 2014. See attachment F.17.2 Student #29.

A copy of the College's Exit Counseling Packet Procedures is included in attachment F.17.3.

---

Finding #18 – Inadequate Award Letter/Not Updated.

Students 5, 16, 17, 19, 20, 22, 23, 25, 26, 27, 29

The College does not concur. See attached award letters for each student.

---

~~Note for Student #5: Student did not withdraw during 2013-14; student was awarded additional state funding and received updated award letter. Letters attached (F18.3).~~

The College has a procedure in place to notify students of their financial aid awards as soon as their FAFSA is received and run through the weekly awarding process by issuing an awards letter to the student. As student awards change, letters are also generated when the changes are made in the awarding process.

The R2T4 process is a separate process from the awarding process and the changes are entered manually in BANNER. The R2T4 procedures have been updated to include letter generation for these students immediately after adjustments have been made to the student's account in BANNER. See attached revised R2T4 procedure, page 7 (attachment F18.2).

**Finding #19 – No Provision to Opt Out of Pell Book Voucher**

The College concurs with finding. See updated policy attached.

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Final Program Review Determination  
PRCN #: 201420428534

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## Appendix D

### Requirement To Resubmit Program Review Reponse



October 21, 2014

Mr. Allen Ivan, President  
Central Georgia Technical College  
80 Cohen Walker Drive  
Warner Robins, GA 31088-2730

UPS 2nd Day Air  
1ZA879640291608844

RE: Requirement to Resubmit Program Review Response  
OPE ID: 005763-00  
PRCN: 201420428534

Dear President Ivan:

The U. S. Department of Education (The Department) has reviewed Central Georgia Technical College's (CGTC) August 8, 2014 response to our June 17, 2014 Program Review Report (PRR). The institution's response identified errors that CGTC failed to satisfactorily address in its submission. CGTC must correct the errors as described below, and resubmit its response.

**Finding #2: Return of Title IV Not Made**

The institution was required to conduct a file review for the 2012/2013 award year for all students who *unofficially* withdrew and/or did not earn at least one passing grade in courses for which the student enrolled. Once the institution has completed its file review, it must provide a list of all students identified by its file review who did not earn 60% or more of Title IV funds disbursed to the student.

The institution provided Excel spreadsheets for the finding; however several spreadsheets were missing some of the elements. In response to this report, CGTC must provide the following information to the Department in an Excel Sheet format:

- Student's Name
- Social Security Number
- Withdrawal Date/Mid-Point of Payment Period, or Period of Enrollment
- Date of Determination
- R2T4 due date (45 days from determination date)
- R2T4 Refund Calculation
- Refund Due to Title IV Program/By Program i.e. PELL/FDL/FSEOG and Award Year
- Date Returned to Title IV Program(s), if applicable

Repayment instructions, if any, will be provided in the Final Program Review Determination (FPRD) Letter.

**Finding #3: Return To Title IV (R2T4) Calculation Errors**

The institution was required to conduct a file review of Return to Title IV (R2T4) calculations for students who attended CGTC during the 2012/2013 award year (excluding students identified in the Program Review Sample and students the institution identified in Finding #2 as unofficial withdrawals) to determine if there are any R2T4 calculation errors for any additional students.

The institution concurred with two of the student files in this finding and provided an acceptable response for the additional students that were listed; however the institution did not conduct the file review. CGTC has been notified in its Final Audit Determination Letter (FAD) that a file review was required for R2T4 calculation errors. The FAD also indicated that due to the program review which was conducted for the same award year, the file review for the R2T4 calculation errors in the A-133 audit, in addition to any liabilities have been deferred to the open program review. Therefore, in response to the Program Review Report, the institution must conduct a file review for this finding.

The results of this review must be provided in Excel or a similar spreadsheet format and contain the following fields:

- Student Name
- Social Security Number
- Start Date
- Withdrawal Date
- Original Amount/Title IV Program of the R2T4 Funds
- Recalculated Amount/Title IV Program of the R2T4 Funds
- Amount Due to Department of Education by Program (i.e PELL, FSEOG, FDL etc.)
- Date Returned to Title IV Program(s), if applicable

Repayment instructions, if any, will be provided in the Final Program Review Determination (FPRD) Letter.

Please see the enclosure Protection of Personally Identifiable Information (PII) for instructions regarding submission of required data / documents containing PII.

The resubmission of CGTC's response to these findings must be sent directly to Alicia Scott of this office within 30 calendar days of the date of this letter. If this corrected response is not received by that date, a Final Program Review Determination may be issued based upon information received by that date.

If you have any questions concerning this report, please call me at 404-974-9491.

Central Georgia Technical College

00576300

Page 3

Sincerely,

Alicia Scott

Institutional Review Specialist

---

cc: Shirley Glover, Financial Aid Administrator  
Jackie White, Financial Aid Administrator

Enclosures:

Protection of Personally Identifiable Information

Final Program Review Determination  
PRCN #: 201420428534

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Appendix E

Program Review Report

Prepared for

**Central Georgia Technical  
College**

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

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the AMERICAN MIND™

OPE ID 00576300  
PRCN 201420428534

---

Prepared by: Alicia Scott  
U.S. Department of Education  
Federal Student Aid  
School Participation Division-Atlanta

# Program Review Report

June 17, 2014

U.S. Department of Education  
School Participation Division SC – Atlanta  
61 Forsyth St. SW, Room 18T40, Atlanta GA 30303-3104  
[StudentAid.gov](http://StudentAid.gov)

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**A. Institutional Information**

Central Georgia Technical College  
80 Cohen Walker Drive  
Warner Robins, GA 31088-2729

---

Type: Public

Highest Level of Offering: Associates Degree

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

Current Student Enrollment: 10,500 (2013-2014)

% of Students Receiving Title IV: 62% (2013-2014)

Title IV Participation - Postsecondary Education Participation System (PEPS)

	2012-2013
Federal PELL Grant	\$6,983,902
William D. Ford Federal Direct Loan Program (Direct Loan)	\$8,740,839
Federal Supplemental Educational Opportunity Grant (FSEOG)	\$67,934
Federal Work Study Program (FWS)	\$30,750

The school began participation in the Direct Loan Program in the 2011 - 2012 award year.

## **B. Scope of Review**

The U.S. Department of Education (the Department) conducted a program review at Central Georgia Technical College (CGTC) from February 24, 2014 to February 28, 2014. The review was conducted by Alicia Scott and Sherry Blackman.

The focus of the review was Enrollment Reporting. The review consisted of an examination of CGTC's withdrawal policy and procedures and examination of individual student files.

A sample of 30 files was identified for review from the 2012/2013 and 2013/2014 (year to date) award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the names and partial social security numbers of 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 CGTC'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 CGTC 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 CGTC to bring operations of the financial aid programs into compliance with the statutes and regulations.

#### **Finding #1:** Lack of Administrative Capability

##### **Citation:**

34 C.F.R. § 668.24 (a), states that an institution shall establish and maintain, on a current basis, any application for Title IV, HEA program funds and program records that document—

- (1) Its eligibility to participate in the Title IV, HEA programs;
- (2) The eligibility of its educational programs for Title IV, HEA program funds;
- (3) Its administration of the Title IV, HEA programs in accordance with all applicable requirements;
- (4) Its financial responsibility, as specified in this part;
- (5) Information included in any application for Title IV, HEA program funds; and
- (6) Its disbursement and delivery of Title IV, HEA program funds.

An institution shall account for the receipt and expenditure of Title IV, HEA program funds in accordance with generally accepted accounting principles. An institution shall establish and maintain on a current basis—

- (i) Financial records that reflect each HEA, Title IV program transaction; and
- (ii) General ledger control accounts and related subsidiary accounts that identify each Title IV, HEA program transaction and separate those transactions from all other institutional financial activity.

In addition, 34 C.F.R. § 668.32 of the General Provisions states that a school participating in the FFEL Program is eligible to receive Title IV, HEA program assistance if the student—

- (i) Is a regular student enrolled, or accepted for enrollment, in an eligible program at an eligible institution;
- (ii) For purposes of the FFEL and Direct Loan programs, is enrolled for no longer than one twelve-month period in a course of study necessary for enrollment in an eligible program; or
- (iii) For purposes of the Federal Perkins Loan, FWS, FFEL, and Direct Loan programs, is enrolled or accepted for enrollment as at least a half-time student at an eligible institution in a program necessary for a professional credential or certification from a State that is required for employment as a teacher in an elementary or secondary school in that State;

For purposes of the FFEL and Direct Loan programs, is at least a half-time student; Is not enrolled in either an elementary or secondary school.

**Noncompliance:**

During the review, the following areas of Title IV non-compliance were noted and are considered to demonstrate a lack of administrative capability by Central Georgia Technical College in administering the Title IV Federal Student Aid Programs.

- Satisfactory Academic Progress (SAP) Policy Inadequate
- Return of Title IV (R2T4)
- Inadequate Award Letters
- Failure to Notify Students of Loan Disbursements
- Fail to Verify Students Last Date of Attendance for all "F" grades
- The institution does not have a procedure in place to check validity of high school diplomas/transcripts

**Required Action:**

Each area is discussed more fully in this report which outlines the actions necessary by Central Georgia Technical College to correct these deficiencies. However, in response to this finding the institution must submit to the Department a comprehensive plan to improve the school's administrative capability.

**Finding #2: Return of Title IV Not Made**

**Citation:**

34 § C.F.R. 668.22 states when a recipient of Title IV grant or loan funds withdraws from a school (officially or unofficially) after beginning attendance, the amount of Title IV funds earned by the student must be determined. R2T4 calculations are based on a statutory formula developed by the Department and must be used on all recipients of FSA funds. The formula is based, in part, on the amount of time a student actually spent in attendance at the school. If the amount disbursed to the student is greater than the amount the student earned, unearned funds must be returned no later than 45 days after the date the institution determined that the student withdrew. If the amount disbursed to the student is *less* than the amount the student earned, and for which the student is otherwise eligible, the student may be eligible to receive a post-withdrawal disbursement of the earned aid not received.

With respect to unofficial withdrawals, DCL GEN-04-03 dated November 2004 states that schools must have a procedure for determining whether a Title IV recipient who began attendance during the period actually completed the period, or if the recipient should be treated as a withdrawal. If a student earns a passing grade in one or more of his/her classes during the period for that class, the school can presume that the student completed the course, and thus the

period. However, if a student who began attendance and did not officially withdraw fails to earn a passing grade in at least one course offered over an entire period, the school must assume, for Title IV purposes, that the student has unofficially withdrawn (unless the school can document that the student completed the period).

In addition, schools have two options for determining the last date of attendance of an unofficial withdrawal: 1) use the midpoint of the payment period or period of enrollment, or, 2) if the school is not required to take attendance, determine the last documented academically related activity (e.g., exam, quiz, tutorial, computer-assisted instruction, academic advising/counseling, academic conference, completion of an academic assignment, paper, or project, and/or attending a study group required by the school where attendance was taken).

An institution must have a procedure for determining whether a Title IV recipient who began attendance during a period completed the period or should be treated as a withdrawal. If a student who began attendance and has not officially withdrawn fails to earn a passing grade in at least one course offered over an entire period, the institution must assume, for Title IV purposes, that the student has unofficially withdrawn, unless the institution can document that the student completed the period. In the absence of evidence of a last day of attendance at an academically related activity, a school must consider a student who failed to earn a passing grade in all classes to be an unofficial withdrawal. Refer to the 2013 FSA Handbook, Vol. 5.

**Noncompliance:**

CGTC did not have an internal policy for the 2012/2013 academic year to identify students who unofficially withdrew from the institution. Specifically, for students who did not receive a passing grade in an academic term, the institution did not determine that the student withdrew and did not perform an R2T4 calculation.

**Required Action:**

Due to the extensive errors discovered during the 2012/2013 award year, the institution must review all of its files for the 2012/2013 award year for all students who unofficially withdrew and/or did not earn at least one passing grade in courses for which the student enrolled. Once the institution has completed its file review, it must provide a list of all students identified by its file review who did earn 60% or more of Title IV funds disbursed to the student.

In response to this report, CGTC must provide the following information to the Department in an Excel Sheet format:

- Student's Name
- Social Security Number
- Withdrawal Date/Mid-Point of Payment Period, or Period of Enrollment
- Date of Determination
- R2T4 due date (45 days from determination date)

- R2T4 Refund Calculation
- Refund Due to Title IV Program/By Program i.e. PELL/FDL/FSEOG and Award Year
- Date Returned to Title IV Program(s), if applicable

Please submit the results of your review electronically. Return the file to Alicia Scott by email at [Alicia.scott@ed.gov](mailto:Alicia.scott@ed.gov). CGTC must submit the data file in a .zip file encrypted with CGTC Encryption.

The institution must also update its procedures to ensure that these errors do not happen again in the future. The institution must publish its unofficial withdrawal policy in its school's catalog. A copy of the institution's revised policies and procedures should also be included with the institution's response to this report. The suggested procedures must be provided in response to this Program Review Report. Any liabilities for this finding will be addressed in the Final Program Review Determination (FPRD) letter.

**Finding #3: Return To Title IV (R2T4) Calculation Errors**

**Citation:**

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

34 C.F.R. § 668.22 (c) states for purposes of this section, for a student who ceases attendance at an institution that is not required to take attendance, the student's withdrawal date is—

- (i) The date, as determined by the institution, that the student began the withdrawal process prescribed by the institution;
- (ii) The date, as determined by the institution, that the student otherwise provided official notification to the institution, in writing or orally, of his or her intent to withdraw;
- (iii) If the student ceases attendance without providing official notification to the institution of his or her withdrawal in accordance with paragraph (c)(1)(i) or (c)(1)(ii) of this section, the mid-point of the payment period (or period of enrollment, if applicable);
- (iv) If the institution determines that a student did not begin the institution's withdrawal process or otherwise provide official notification (including notice from an individual acting on the student's behalf) to the institution of his or her intent to withdraw because of illness, accident, grievous personal loss, or other such circumstances beyond the student's control, the date that the institution determines is related to that circumstance.

34 C.F.R. § 668.22 (e)(2) states the percentage of Title IV grant or loan assistance that has been earned by the student is equal to the percentage of the payment period or period of enrollment that the student completed as of the student's withdrawal date.

~~34 C.F.R. § 668.22 (g) states that the institution must return, in the order specified in paragraph (i) of this section, the lesser of—~~

(i) The total amount of unearned title IV assistance to be returned as calculated under paragraph (e)(4) of this section; or

(ii) 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 title IV grant or loan assistance that has not been earned by the student, as described in paragraph (e)(3) of this section.

The 2012-2013 Federal Student Aid Handbook, Volume 5, Chapter 1, page 58 states a school that is not required to take attendance may always use a student's last date of attendance at an academically related activity, as documented by the school, as the student's withdrawal date, in lieu of the withdrawal dates listed previously.

The Federal Student Aid Handbook (FSA) states, unearned funds must be returned no later than 45 days after the date of the school's determination that the student withdrew. The Department considers the school to have returned funds, depending upon the method it uses to return them. Specifically, the regulations provide that a school has returned funds when it has:

- deposited or transferred the funds into the bank account it maintains for federal funds (see sidebar) no later than 45 days after the date it determines that the student withdrew,
- initiated an electronic funds transfer (EFT) no later than 45 days after the date it determines that the student withdrew, or
- issued a check no later than 45 days (as supported by the school's records) after the date it determines that the student withdrew.

If a check is used to return unearned funds, that the check should be endorsed by the Department no later than 60 days after the school's determination that a student withdrew to be considered a timely return. Federal Student Aid Handbook (FSA) Vol. 2—School Eligibility and Operations 2012–2013

### **Noncompliance:**

During the review, the reviewers found R2T4 calculation errors for the following students:

Student #16: R2T4 was processed based on 60 days attended. The student was enrolled 8/19/2013 through 10/17/2013. Based on the institution's academic calendar, the school was closed on September 2, 2013. The student attended 59 days. In addition, the student has an

official withdrawal date of 10/17/2013 and a date of determination of 12/19/2013. The institution did not return the unearned funds within the 45 days compliance requirement. The institution returned the unearned portion of the funds to the Department on 12/31/2013.

Student #17: R2T4 was processed based on 25 days attended. The student was enrolled 8/19/2013 through 9/12/2013. Based on the institution's academic calendar, the school was closed on September 2, 2013. The student attended 24 days.

Student #18: R2T4 was processed based on 53 days attended. The student was enrolled 8/19/2013 through 9/12/2013. Based on the institution's academic calendar, the school was closed on September 2, 2013. The student attended 58 days

Student #19: R2T4 was processed based on 18 days attended. The student was enrolled 8/19/2013 through 9/5/2013. Based on the institution's academic calendar, the school was closed on September 2, 2013. The student attended 17 days.

Student #20: R2T4 was processed based on 58 days attended. The student was enrolled 8/19/2013 through 10/15/2013. Based on the institution's academic calendar, the college was closed on September 2, 2013. The student attended 57 days.

Student #22: R2T4 was processed based on 54 days attended. The student was enrolled 8/19/2013 through 10/11/2013. Based on the institution's academic calendar, the college was closed on September 2, 2013. The student attended 53 days

Student #23: R2T4 was processed based on 57 days attended. The student was enrolled 8/19/2013 through 10/14/2013. Based on the institution's academic calendar, the college was closed on September 2, 2013. The student attended 56 days. In addition, the student has a last date of attendance (LDA) of 10/14/2013. The institution did not determine the student's LDA until 12/18/2013. The institution did not return the unearned funds within the 45 days compliance requirement. The institution returned the unearned portion of the funds to the Department on 12/31/2013.

Student #24: R2T4 was processed based on 26 days attended. The student was enrolled 8/19/2013 through 9/13/2013. Based on the institution's academic calendar, the college was closed on September 2, 2013. The student attended 25 days.

Student #25: R2T4 was processed based on 16 days attended. The student was enrolled 8/19/2013 through 8/27/2013. The student attended 9 days.

Student #26: R2T4 was processed based on 44 days attended. The student was enrolled 8/19/2013 through 10/1/2013. Based on the institution's academic calendar, the college was closed on September 2, 2013. The student attended 43 days.

Student #27: R2T4 was processed based on 53 days attended. The student was enrolled 8/19/2013 through 10/10/2013. Based on the institution's academic calendar, the college was closed on September 2, 2013. The student attended 52 days.

~~Student #28: R2T4 was processed based on 59 days attended. The student was enrolled 8/19/2013 through 10/16/2013. Based on the institution's academic calendar, the college was closed on September 2, 2013. The student attended 58 days.~~

Student #29: R2T4 was processed based on 16 days attended. The student was enrolled 1/7//2014 through 1/16/2014. The student attended 15 days.

**Required Action:**

Based upon the error rate for this finding, the school must conduct a file review of Return to Title IV (R2T4) calculations for students who attended CGTC during the 2012/2013 and 2013/2014 award years (excluding students identified in Program Review Sample) to determine if an R2T4 calculation should be performed for any additional students. Also, CGTC must correct any errors discovered in the file review and report the outcome to the Department as part of CGTC's Program Review Report response. The results of this review must be provided in Excel or a similar spreadsheet format and contain the following fields:

Please provide this information in the following format:

- Student Name
- Social Security Number
- Start Date
- Withdrawal Date
- Original Amount/Title IV Program of the R2T4 Funds Calculated By School and Award Year
- Recalculated Amount/Title IV Program of the R2T4 Funds Calculated By School and Award Year
- Amount Due to Department of Education by Program (i.e PELL, FSEOG, FDL etc.)

Please send the file review summary reports (spreadsheets) to Alicia Scott by e-mail at [alicia.scott@ed.gov](mailto:alicia.scott@ed.gov). CGTC must submit a copy of each affected student's R2T4 worksheet. In addition, CGTC must revise its Withdrawal Policy/Procedures to ensure future compliance. The revised policy/procedures document must be submitted in response to this Program Review Report.

**Finding #4:** Return to Title IV (R2T4) Policy Inadequate

**Citation:**

34 C.F.R. § 668.43 (a) states institutional information that must make readily available to enrolled and prospective students under this subpart includes, but is not limited to—

(4) A summary of the requirements under §668.22 for the return of title IV grant or loan assistance;

34 C.F.R. § 668.22 (g) states that the institution must return, in the order specified in paragraph (i) of this section, the lesser of—

(i) The total amount of unearned title IV assistance to be returned as calculated under paragraph (e)(4) of this section; or

(ii) 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 title IV grant or loan assistance that has not been earned by the student, as described in paragraph (e)(3) of this section.

34 C.F.R. § 668 (j) (1) states an institution must return the amount of title IV funds for which it is responsible under paragraph (g) of this section as soon as possible but no later than 45 days after the date of the institution's determination that the student withdrew as defined in paragraph (l)(3) of this section. The timeframe for returning funds is further described in §668.173(b).

The 2012-2013 Federal Student Aid Handbook, Volume 5, Chapter 1, pp.6 states, a school should provide sufficient information for a student or prospective student to be able to determine the procedures for withdrawing and the financial consequences of doing so. In addition, a student should be able to estimate how much Federal Student Aid he or she will retain, and how much he or she may have to return upon withdrawing. Because the Return provisions do not affect institutional refund policies, a school must provide a student with information on both the school's refund policy and the federal Return requirements, and explain the interaction between the two. The information should include a discussion of how a school might adjust a student's charges to take into account any return of FSA funds the school might be required to make. Finally, a student or prospective student should be informed that if he or she withdraws, school charges that were previously paid by FSA funds might become a debit that the student will be responsible for paying.

**Noncompliance:**

CGTC's current R2T4 Policy does not satisfy all of the required components. Specifically, the institution's current policy does not accurately define the amount of unearned aid to be returned to the Department. In addition, CGTC does not include the time frame for the return of Title IV funds.

Also, CGTC's R2T4 policy did not adequately address the following:

- Adequately explain the financial consequences of withdrawing.
- Provide an estimate of the amount of aid the student may earn and an estimate of the amount the student may have to return. The current policy provides a narrative using percentages of earned and unearned aid. An example using student specific data would provide a clearer and more concise estimate.
- Clearly state that federal funds may not cover all unpaid institutional charges due to the institution upon the student's withdrawal.
- Adequately explain the order in which funds are returned and the timeframe to return funds to the Department..

**Required Action:**

CGTC must revise and publish its R2T4 policy. The policy must adequately address each of the requirements outlined in the noncompliance section of this finding. In its response to this Program Review Report, CGTC must submit a revised written R2T4 Policy to the Department.

**Finding #5: Ineligible Student/ Not Making Satisfactory Academic Progress**

**Citation:**

34 C.F.R. § 668.32(f)(4) states that a student is eligible to receive Title IV, HEA program assistance if the student maintains satisfactory progress (SAP) in his or her course of study according to the institution's published standards of satisfactory progress as long as those standards satisfy the provisions of 34 C.F.R. § 668.16 (e).

34 C.F.R. § 668.16, General provisions, states to be eligible for Federal Student Aid, a student must make satisfactory academic progress. Your school must have a satisfactory academic progress policy that includes both a qualitative (such as the use of cumulative grade point average) and a quantitative measure (such as a maximum time frame of 150% for completion) of the student's progress.

The following standards must be included:

1. Qualitative Measure: Grades, work projects completed, or comparable factors, which are measured against a norm.
2. Quantitative Measure: A maximum timeframe in which the student must complete his or her educational program. The time frame must be (1) based on the student's enrollment status; (2) for an undergraduate program, no longer than 150 percent of the published length of the educational program for a full-time student; and (3) divided into increments

of equal size, not to exceed the lesser of one academic year or one-half the published length of the educational program.

3. A schedule established by the institution designating the minimum percentage or amount of work that a student must successfully complete at the end of each increment to complete his or her educational program within the maximum time frame.
4. A determination at the end of each increment by the institution whether the student has successfully completed the appropriate percentage or established schedule.
5. Consistent application of standards to all students within categories of students, i.e. full-time, part-time, undergraduate and graduate students, and educational programs established by the institution.
6. Specific policies defining the effect of course incompletes, withdrawals, repetitions, and non-credit remedial course on satisfactory progress.
7. Specific procedures under which a student may appeal a determination that he or she is not making satisfactory progress.
8. Specific procedures for reinstatement of aid.

**Noncompliance:**

The institution's SAP policy indicates the following:

**Quantitative:** The maximum time frame (pace) for a student to complete a program cannot exceed 150% of the published length of the program for which the student is enrolled. In order to meet this standard, a student must complete and pass at least 67% of all credit hours attempted. Courses earned include grades of A, B, C, D or F. Courses attempted include grades of A, B, C, D, F, W, I, or IP. Attempted remedial courses are not included in this measurement.

**Qualitative:** The student must maintain a cumulative GPA of 2.0 or above in order to remain eligible for financial aid. Grades of A, B, C, D, or F are included in the calculation of the cumulative GPA. Grades of I, W, or IP do not affect the GPA. Attempted remedial courses are included in this measurement.

**Maximum Time Frame (150% standard):** Students must complete their program of study within one and one-half (150%) times the normal length of the program of study. This includes all credit hours attempted whether they are completed or passed. For example, if a program of study is 80 credit hours, the maximum timeframe to complete the program and receive financial aid is 120 attempted credit hours. The maximum timeframe will vary depending upon the length of the program of study. Changing majors may result in a student exceeding the maximum timeframe for completion.

**SAP Status:** A student that does not maintain a 2.0 GPA and/or does not complete at least 67% of all attempted hours at the time SAP is checked, will be placed on Financial Aid Warning Status and will continue to receive financial aid for one term only. Students will be notified of their SAP Status by email.

If at the completion of the Financial Aid Warning term:

- the student has met the quantitative and/or qualitative SAP standards, the student will be placed in Good Standing Status and will continue to receive financial aid.

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- the student has not met the quantitative and/or qualitative SAP standard, the student will be placed on Financial Aid Unsatisfactory Status and will not be eligible to receive financial aid for the any terms after the completion of the Financial Aid Warning term. (Note: If the student is enrolled while on Financial Aid Unsatisfactory Status, student will be required to pay tuition, fees, books and other related charges out of pocket.)

Appeal Process: Any student placed on Financial Aid Unsatisfactory Status may submit an appeal. The student must submit a Request for Financial Aid Appeal form within 10 days from the date the student is notified of the Unsatisfactory Status. Appeal forms can be obtained from the Financial Aid Office.

Acceptable conditions to file an appeal include:

- Death of a relative, or
- Injury or illness of the student, or
- Other extenuating circumstance

The student must submit an appeal form along with documentation to support the acceptable conditions for the appeal to be considered. The student must submit an explanation of what has changed in his/her situation that will allow the student to demonstrate satisfactory academic progress at the next evaluation.

Once appeal documentation has been received and reviewed for completeness, the college has 30 days from the date the appeal is submitted to review, render a decision and notify the student of the results. The student will be notified by email of the appeal decision.

- If appeal is granted, the student will be placed on Financial Aid Probation beginning with the next term of enrollment (after appeal is granted) and will be eligible to receive financial aid. The student will be required to maintain SAP requirements during the Financial Aid Probation terms and must follow any stipulations or Academic Plan as set forth by the Appeal Advisor. If placed on an Academic Plan, the student will be allowed to receive financial aid as long as the student meets the qualitative and quantitative requirements per term and adheres to any other stipulations set forth by the appeals committee. If the student fails to maintain SAP requirements during the Financial Aid Probation terms, the student will be placed again on Financial Aid Unsatisfactory Status and will not be eligible for financial aid. The student may regain financial aid eligibility once the student completes the necessary hours and earns the minimum required GPA to meet SAP requirements.

- If appeal is denied, the student will not be eligible for financial aid. The student has the right to file a new appeal; otherwise the student may regain financial aid eligibility once the student completes the necessary hours and earns the minimum required GPA to meet SAP requirements.

Additional information:

- Incomplete courses are included in attempted hours.
- Withdrawals are allowed within reason, but all grades earned in courses in which a student is enrolled beyond the drop/add period are included in hours attempted.
- Repeated coursework –All grades earned for repeated courses are included in the calculation of the GPA and included in hours attempted.
- Transfer credits will be awarded for courses applicable to student's chosen program of study and count in both hours attempted and earned.
- Study abroad – not applicable
- Audited courses are not considered credit courses and are not included in the SAP process.
- Consortium agreements – not applicable
- Program changes may impact the length of time required to meet new program requirements. Program changes are allowed only once per semester.

The following students were not making SAP.

Student #12 had a cumulative GPA of 1.90 at the end of summer semester 2012 and a cumulative GPA of 1.72 at the end of the fall semester 2012. The student was not making SAP for the spring semester 2013. There is no documentation in the file to indicate that the student submitted a SAP appeal for the spring 2013 semester.

Student #13 had a cumulative quantitative measure of 55% at the end of the summer quarter 2008 and a cumulative quantitative measure of 60% at the end of the fall quarter 2008. The student failed to make SAP for the fall semester 2012. There is no documentation in the file to indicate the student submitted a SAP appeal and was granted "probation."

Student #25 attended the institution during the following terms; fall quarter 2002, summer quarter 2010 and fall semester 2013. The student had a GPA of "0" fall quarter 2002 and summer quarter 2010. The student was not making Satisfactory Academic Progress (SAP) in the fall 2013 semester. There is no documentation in the file to indicate the student submitted a SAP appeal.

Student #26 had a GPA of ".69" summer quarter 2008, GPA of "0" fall quarter 2009, GPA of "0" winter quarter 2010, GPA of 4.0 spring quarter 2010, GPA of .40 summer quarter 2010, GPA of "0" fall quarter 2010 and GPA of 1.18 summer quarter 2013. The student was not making Satisfactory Academic Progress (SAP) for the fall semester 2013. There is no documentation in the file to indicate the student submitted a SAP appeal.

**Required Action:**

The institution must respond agree or disagree to the finding for students #12, 13, 25, and 26. Due to the extensive errors, the institution must review all of its files for students in the statistical sample (Appendix B) for the 2012/ 2013 and 2013/2014 award years and determine if additional students were not making SAP. Once the institution has completed its file review, it must provide a list of all students identified by its file review who's SAP was not documented.

A report detailing the results of the institution's review must be submitted in the following format:

- Student's Name
- Social Security Number
- Date of disbursement
- SAP status and effective date
- Ineligible Title IV Funds Received by Program (i.e PELL, FSEOG, FDL, etc.)

<b>Title IV Disbursed For An Ineligible Determination of SAP Appeal</b>									
<u>Name</u>	<u>SSN</u>	<u>Date of Disbursement</u>	<u>Pell</u>	<u>FSEOG</u>	<u>Sub</u>	<u>Unsub</u>	<u>PLUS</u>	<u>SAP Status</u>	<u>Effective Date/Semester</u>
1.			\$2775	\$200	\$2750	\$0	\$2300		

*\*You may use a common disbursement date for all students for the term*

In lieu of performing a file review for the entire population of students who were not Accurately Monitored for SAP/Failed SAP to determine actual liabilities, CGTC has the option of performing this file review for only the remainder of the statistical sample (Appendix B) not tested by the Department during the program review. The results from this file review using the statistical sample will be used to project liabilities for the entire population (i.e., the average liability for the recipients in the statistical sample will be multiplied by the total population). This option is intended to reduce the burden on the institution of conducting a full file review.

If CGTC wishes to select this option, the Department will send by e-mail spreadsheets containing the statistical samples for award years 2012/2013 and 2013/2014. File reviews must be performed for all students on each statistical sample listing except those included in Appendix A of this Program Review Report for the respective award year.

If CGTC elects to do the full file review, it is recommended that CGTC first review the remainder of the students in the statistical sample. At that point, CGTC may decide to accept a liability projection instead of continuing with a full file review.

The institution must update its SAP policy to comply with federal regulations. The institution must submit the updated procedures to the Department as part of its response to this finding.

**Finding #6: Satisfactory Academic Policy Not Adequately Developed**

**Citation:**

34 C.F.R. § 668.16, General provisions, states that to be eligible for Federal Student Aid, a student must make satisfactory academic progress. Your school must have a satisfactory academic progress policy that includes both a qualitative (such as the use of cumulative grade point average) and a quantitative measure (such as a maximum time frame of 150% for completion) of the student's progress.

The following standards must be included:

1. Qualitative Measure: Grades, work projects completed, or comparable factors, which are measured against a norm.
2. Quantitative Measure: A maximum timeframe in which the student must complete his or her educational program. The time frame must be (1) based on the student's enrollment status; (2) for an undergraduate program, no longer than 150 percent of the published length of the educational program for a full-time student; and (3) divided into increments of equal size, not to exceed the lesser of one academic year or one-half the published length of the educational program.
3. A schedule established by the institution designating the minimum percentage or amount of work that a student must successfully complete at the end of each increment to complete his or her educational program within the maximum time frame.
4. A determination at the end of each increment by the institution whether the student has successfully completed the appropriate percentage or established schedule.
5. Consistent application of standards to all students within categories of students, i.e. full-time, part-time, undergraduate and graduate students, and educational programs established by the institution.
6. Specific policies defining the effect of course incompletes, withdrawals, repetitions, and non-credit remedial course on satisfactory progress.
7. Specific procedures under which a student may appeal a determination that he or she is not making satisfactory progress.
8. Specific procedures for reinstatement of aid.

**Noncompliance:**

The institution's current written Satisfactory Academic Progress (SAP) policy is not in compliance with federal regulations. Specifically, CGTC provided a written SAP policy to the reviewers. However, the policy the institution provided is not printed in the school's 2012/2013 and 2013/2014 school's catalog. The policy printed in the school's catalog is incomplete.

In addition, the institution allows a student to appeal financial aid suspension and the policy does not inform students of the appeal process.

**Required Action:**

The institution must update its catalog to include its most current SAP policy. The institution must submit the updated procedures to the Department as part of its response to this finding.

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**Finding #7: Missing Documentation of High School Diploma/Transcript**

**Citation:**

34 C.F.R. § 668.32, Student Assistance General Provisions advises a student is eligible to receive Title IV funds if the student is a regularly enrolled student or one who is accepted for enrollment in an eligible program at an eligible institution. Among other criteria, the student must have a high school diploma or its recognized equivalent or have a passing score on a specified, Department approved, independently administered test in accordance with subpart J of Section 668.32.

The Department recognizes several equivalents to a high school diploma:

1. A General Equivalency Diploma (GED);
2. A certificate demonstrating that the student has passed a state-authorized examination that the state recognizes as the equivalent of a high school diploma;
3. An academic transcript of a student who has successfully completed at least a two-year program that is acceptable for full credit toward a bachelor's degree; or
4. For a student who enrolls before completing high school, a high school transcript indicating the student has excelled in high school. The student must no longer be enrolled in high school; must satisfy your school's written policy for admitting such students, and must be starting a program that leads at least to an associate's degree or its equivalent.

The student may also complete a GED or be home schooled under the applicable state law. 34 C.F.R. § 600.5 states that a proprietary institution of higher education that admits as regular students only persons who have a high school diploma; have a recognized equivalent of a high school diploma or are beyond the age of compulsory school attendance in the state in which the institution is physically located.

**Noncompliance:**

For students #16 and 20, the institution did not provide documentation that these students had received a high school diploma, its equivalency or had demonstrated other activities in lieu of a high school diploma to be eligible for Title IV.

**Required Action:**

In response to this report, the institution must obtain and submit the high school diploma for students #16 and 20 or provide documentation that the students had demonstrated other activities in lieu of a high school diploma. Only diplomas from valid high schools will be accepted to be Title IV eligible. Should the corrections result in a change in funding for the student, the institution must report the difference and will be liable.

**Finding #8:** Missing Policy/Procedure to Validate Questionable High School Diploma

**Citation:**

The 2013-2014 Federal Student Aid Handbook, Volume 1, Chapter 1, pp. 6-7 states if your school or the Department has reason to believe that the high school diploma is not valid or was not obtained from an entity that provides secondary school education, you must evaluate the validity of the student's high school completion. Students who indicate on their FAFSA that they graduated high school must give the name, city, and state of the high school. FAFSA on the Web will not allow students to skip these items, and it will have a drop-down list of both public and private high schools populated by the National Center for Education Statistics (NCES). Inclusion on the list does not mean that a diploma from the school is valid, nor does exclusion from the list mean that the diploma is invalid. Note also that diplomas from unaccredited high schools can be valid and qualify students to receive FSA funds, as well as to meet college admission standards.

Acceptable documentation for checking the validity of a student's high school completion can include the diploma and a final transcript that shows all the courses the student took. For students who completed their secondary schooling outside the United States, comparable documents can help, as can the services of companies that determine the validity of foreign secondary school credentials. Another resource is the Department of Education in the state in which the high school is located, if that department has jurisdiction over the high school. Colleges are also free to consult with each other as they develop their procedures for checking the validity of high school diplomas.

The Department does not plan to have an appeal process or to intervene in reasonable judgments of school administrators, such as a decision to move a high school from a college's acceptable to unacceptable list or a case where one school has different lists than another.

A college diploma mill is an entity that:

1. Charges someone a fee and requires him to complete little or no education or coursework to obtain a degree, diploma, or certificate that may be used to represent to the general public that he has completed a program of postsecondary education or training; and
2. Lacks accreditation by an agency or association that is recognized as an accrediting body for institutions of higher education by the Secretary (pursuant to Part H, Subpart 2 of Title IV) or a federal agency, state government, or other organization that recognizes accrediting agencies or associations.

**Noncompliance:**

CGTC does not have a policy/procedure in place to check the validity of questionable high school diplomas.

**Required Action:**

In response to this Program Review Report, the institution must draft a Questionable High School Diploma Review Policy/Procedure and submit a copy to the Department for review.

**Finding #9: Missing or Incomplete Admission File**

**Citation:**

Federal Regulations 34 C.F.R. § 668.32 states, students who do not meet admissions criteria established by an institution should not be accepted for enrollment at that institution. A student is only eligible to receive Title IV assistance if the student is a regular student enrolled or accepted for enrollment in an eligible program. For each Title IV recipient, the institution must maintain, on a current basis, records regarding the student's admission to and enrollment status at the institution.

**Noncompliance:**

Student #25 did not sign his/her Application for Admission.

A student's admission file includes application for admission, high school diploma or transcripts, college transcripts, etc. The reviewers found one instance in which a student's admission file was incomplete.

**Required Action:**

The institution must correct the discrepancies and send proof that the errors have been corrected. Should the corrections result in a change in funding for the student, the institution will be liable for the difference.

**Finding #10: Verification Violation**

**Citation:**

34 C.F.R. § 668.51 states that an institution shall establish and use written policies and procedures for verifying information contained in a student aid application in accordance with the provisions of this subpart. These policies and procedures must include –

- (1) The time period within which an applicant shall provide the documentation;

- (2) The consequences of an applicant's failure to provide required documentation within the specified time period;
- (3) The method by which the institution notifies an applicant of the results of verification if, as a result of verification, the applicant's Expected Family Contribution changes and results in a change in the applicant's award or loan;
- (4) The procedures the institution requires an applicant to follow to correct application information determined to be in error.

34 C.F.R. § 668.54 states that if an institution has reason to believe that any information on an application used to calculate an EFC is inaccurate, it shall require the applicant to verify the information that it has reason to believe is inaccurate.

34 C.F.R. § 668.55, Updating information, states that an applicant is required to update the number of family members in the applicant's household and the number of those household members attending postsecondary educational institutions, in accordance with provisions of paragraph (b) of this section; and his or her dependency status in accordance with the provisions of paragraph (d) of this section.

If the number of family members in the applicant's household or the number of those household members attending postsecondary educational institutions changes for a reason other than a change in the applicant's marital status, an applicant who is selected for verification shall update the information contained in his or her application regarding those factors so that the information is correct as of the day the applicant verifies the information.

34 C.F.R. § 668.56(a), Items to be verified, states that an institution shall require an applicant selected for verification under 668.54(a)(2) or (3) to submit acceptable documentation described in 668.57 that will verify or update the following information used to determine the applicant's EFC:

- (1) Adjusted gross income (AGI) for the base year if base year data was used in determining eligibility, or income earned from work, for a non-tax filer.
- (2) U.S. income tax paid for the base year if base year data was used in determining eligibility.
- (3) For an applicant who is a dependent student, the aggregate number of family members in the household or households of the applicant's parents if—
  - (A) The applicant's parent is single, divorced, separated or widowed and the aggregate number of family members is greater than two; or
  - (B) The applicant's parents are married to each other and not separated and the aggregate number of family members is greater than three.

34 C.F.R. § 668.57, Acceptable documentation, states that an institution shall require an applicant selected for verification to verify AGI and U.S. income tax paid by submitting to it, if relevant \_\_

- (1) A copy of the income tax return of the applicant, his or her spouse, and his or her parents. The copy of the return must be signed by the filer of the return or by one of the filers of a joint return;
- (2) For a dependent student, a copy of each Internal Revenue Service (IRS) Form W-2 received by the parent whose income is being taken into account if—
  - (A) The parents file a joint return; and
  - (B) The parents are divorced or separated or one of the parents has died.

**Noncompliance:**

The reviewers found one instance where verification was inaccurate.

Student #8: Untaxed income was reported on the Institutional Student Information Records (ISIR) in the amount of \$8,250; however, the documentation on file does not reflect any untaxed income.

**Required Action:**

The institution must correct the discrepancies and send supporting evidence that the errors have been corrected. Should the corrections result in a change in funding for the student, the institution will be liable for the difference.

**Finding #11: Credit Balance Deficiency**

**Citation:**

34 C.F.R. § 668.164 (d) and (e) states that an institution may use Title IV program funds to credit a student's account to satisfy current year charges for—

- i. Tuition and fees;
- ii. Room and board, if the student contracts with the school for room and board;
- iii. With a student's authorization under 668.165(b), other educationally related charges; and prior award year charges for a total of not more than \$200.

If current year Title IV funds credited to a student's account exceed the amount of current year tuition, fees, and other authorized charges, the institution must pay the resulting credit balance directly to the student or parent as soon as possible but no later than 14 days after the credit balance occurred if it occurred after the first day of class. If the credit balance occurred on or before the first day of class, it must be returned no later than 14 days after the first day of class.

An institution may secure a student's written permission to retain credit balance funds for budgeting purposes but it must be optional. The student must not be coerced into providing the school permission to retain the funds and the student must be informed of his or her right to rescind the authorization at any time. If an institution holds excess student funds, it must—

- i. Identify the amount of funds it holds for each student or parent in a subsidiary ledger account designed for that purpose;
- ii. Maintain, at all times, cash in its bank account in an amount at least equal to the amount of funds the institution holds for the student; and
- iii. Notwithstanding any authorization obtained by the institution, pay any remaining balance on loan funds by the end of the loan period and any other remaining Title IV funds by the end of the last payment period in the award year for which they were awarded.

If a school has lost contact with a student who is due a credit balance, it must use all reasonable means to locate him or her. If it still cannot find the student, the school must return the credit balance to the lender to reduce the borrower's loan balance, or, to the appropriate Title IV program(s).

**Noncompliance:**

CGTC does not have a published credit balance policy in its school catalog. In addition, the reviewers identified one student from the 2012/2013 award year that did not have his/her credit balances paid within the required timeframe.

Student #14 had a credit balance which occurred on 2/28/2013. The institution issued the credit balance payment to the student on 3/18/2013.

**Required Action:**

CGTC must pay a credit balance directly to the student or parent as soon as possible but not later than 14 days after the credit balance occurred if it occurred after the first day of class. If the credit balance occurred on or before the first day of class, it must be returned no later than 14 days after the first day of class.

The institution must also update its school catalog to include its credit balance policy. A copy must be provided to the Department as a part of the institution's response to the Program Review Report.

**Finding #12: Improper Origination of Direct Loan**

**Citation:**

34 C.F.R. § 685.200 (a) states a student is eligible to receive a Federal Direct Subsidized Loan, a Federal Direct Unsubsidized Loan, or a combination of these loans, if the student meets the following requirements:

- (i) The student is enrolled, or accepted for enrollment, on at least a half-time basis in a school that participates in the Federal Direct Loan Program.

(ii) The student meets the requirements for an eligible student under 34 CFR part 668.

(iii) In the case of an undergraduate student who seeks a Federal Direct Subsidized Loan or a Federal Direct Unsubsidized Loan at a school that participates in the Federal Pell Grant Program, the student has received a determination of Federal Pell Grant eligibility for the period of enrollment for which the loan is sought.

34 C.F.R. § 685.301 (a) (8) states a school may refuse to originate a Federal Direct Subsidized, Federal Direct Unsubsidized, or Direct PLUS Loan or may reduce the borrower's determination of need for the loan if the reason for that action is documented and provided to the borrower in writing, and if—

(i) The determination is made on a case-by-case basis;

(ii) The documentation supporting the determination is retained in the student's file; and

(iii) The school does not engage in any pattern or practice that results in a denial of a borrower's access to Federal Direct Loans because of the borrower's race, gender, color, religion, national origin, age, disability status, or income.

The 2013/2014 Federal Student Aid Handbook, Volume 3, Chapter 7, pp. 130 states your school cannot originate Federal Direct Loans only in the amount needed to cover the school charges, nor limit Direct Unsubsidized borrowing by independent students.

DCL GEN 11-07 Section 479A(c) of the Higher Education Act, as amended (HEA), and the Federal Direct Loan Program regulations at 34 C.F.R. 685.301(a)(8) give schools the authority to refuse to originate a Federal Direct Loan or to reduce the amount of an individual borrower's eligibility for a Direct Loan. Any such determination must be made on a case-by-case basis. The decision must be provided to the student or parent borrower in writing and documentation supporting the determination must be retained in the student's file at the school.

Schools do not have the authority to limit Federal Direct Loan borrowing by students or parents on an across-the-board or categorical basis. For example, schools may not limit all student and parent Federal Direct Loan borrowing to the amounts needed to cover only institutional costs, if the borrowers would otherwise be eligible to receive additional loan funds. Similarly, schools may not have policies that would result in certain categories of borrowers (e.g., first-year students, students who live at home, or students in certain majors) being denied access to Federal Direct Loans, or that would reduce the amount of Federal Direct Loan funds that borrowers in certain categories would otherwise be eligible to receive. In addition, schools may not have policies that allow students to receive Direct Loans only for certain enrollment periods (e.g., for regular terms, but not summer terms).

Finally, we note that schools are not precluded from counseling students on the differences between subsidized loans and unsubsidized loans, and emphasizing that students should borrow

Federal Direct Unsubsidized Loans only if they have exhausted all non-loan options for financing their education.

**Noncompliance:**

Student #18 was awarded a \$3,500 subsidized loan for award year 2013/2014. Based on the student's earned hours, the student should have been awarded a \$5,500 subsidized loan.

The institution has an internal policy that requires students to complete a Student Loan Packet to be awarded Direct Loans. A student is eligible for a Federal Direct Loan once he/she meets the eligibility requirements. Reduction and cancellation of a loan must be administered through appropriate notifications. Consumer information regarding default, anticipated monthly payments, NSLDS account information, etc., can be distributed by the school at its discretion.

The Electronic Announcement dated March 18, 2014 posted on the Information for Financial Aid Professionals (IFAP) website states "the Free Application for Federal Student Aid (FAFSA) is the only form that a student is required to complete to be considered for student assistance from any of the Title IV, HEA programs. No additional application or other request for information can be required by an institution in support of the student's request for Title IV, HEA program assistance, except for information needed to ensure the student's eligibility for such assistance (e.g., information needed to complete verification or to demonstrate compliance with the student eligibility provisions of the HEA and the regulations). While institutions and states may require other applications or additional information for the administration of their non-Title IV programs, they cannot require such information for the determination of a student's eligibility for Title IV, HEA student assistance. Thus, it must be clear in all of an institution's printed and electronic materials that no other application or information is required for consideration by the institution of the student's eligibility for assistance under the Title IV, HEA programs."

**Required Action:**

If the the student is currently enrolled and the loan period is still open, the institution must correct the discrepancies by awarding the student his/her full Direct Loan eligibility. The institution must send proof that the errors have been corrected. If the student is not currently enrolled and the loan period is closed, no further action is required.

CGTC must discontinue the practice of requiring students to complete a supplementary Student Loan Packet in order to be awarded a Federal Direct Loan. CGTC must submit a revised Awarding Policy/Procedures document to the Department that addresses the issues described in the noncompliance section of this finding.

**Finding #13: Borrower Not Notified Timely To Cancel All Or Part Of Or Loan Disbursement**

**Citation:**

34 C.F.R. § 668.165 (a) states before an institution disburses title IV, HEA program funds for any award year, the institution must notify a student of the amount of funds that the student or his or her parent can expect to receive under each title IV, HEA program, and how and when those funds will be disbursed. If those funds include Direct Loan or FFEL Program funds, the notice must indicate which funds are from subsidized loans and which are from unsubsidized loans.

(2) Except in the case of a post-withdrawal disbursement made in accordance with §668.22(a)(5), if an institution credits a student's account at the institution with Direct Loan, FFEL, Federal Perkins Loan, or TEACH Grant Program funds, the institution must notify the student or parent of—

(i) The anticipated date and amount of the disbursement;

(ii) The student's right or parent's right to cancel all or a portion of that loan, loan disbursement TEACH Grant, or TEACH Grant disbursement and have the loan proceeds returned to the holder of that loan, the TEACH Grant proceeds returned to the Secretary. However, if the institution releases a check provided by a lender under the FFEL Program, the institution is not required to provide this information; and

(iii) The procedures and time by which the student or parent must notify the institution that he or she wishes to cancel the loan, loan disbursement, TEACH Grant, or TEACH Grant disbursement.

(3) The institution must provide the notice described in paragraph (a)(2) of this section in writing—

(ii) 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.

(4)(i) A student or parent must inform the institution if he or she wishes to cancel all or a portion of a loan, loan disbursement, TEACH Grant, or TEACH Grant disbursement.

(ii) The institution must return the loan or TEACH Grant proceeds, cancel the loan or TEACH Grant, or do both, in accordance with program regulations provided that the institution receives a loan or TEACH Grant cancellation request—

(A) The later of the first day of a payment period or 14 days after the date it notifies the student or parent of his or her right to cancel all or a portion of a loan or TEACH Grant, if the

institution obtains affirmative confirmation from the student under paragraph (a)(6)(i) of this section; or

(B) Within 30 days of the date the institution notifies the student or parent of his or her right to cancel all or a portion of a loan, if the institution does not obtain affirmative confirmation from the student under paragraph (a)(6)(i) of this section.

(iii) If a student or parent requests a loan cancellation after the period set forth in paragraph (a)(4)(ii)(A) or (B) of this section, the institution may return the loan or TEACH Grant proceeds, cancel the loan or TEACH Grant, or do both, in accordance with program regulations.

(5) An institution must inform the student or parent in writing regarding the outcome of any cancellation request.

**Noncompliance:**

Students #4, 5, 6, 18, 26, and 27 had no documentation in the files indicating the students were notified of their right to cancel all or part of the students' Direct Loan funds.

CGTC did not provide evidence that loan disbursement notifications were sent to student borrowers after crediting the student's account with Direct Loan funds. In addition, students were not provided with the right to cancel all or a portion of the loan or the procedures and time by which the student or parent must notify the institution that he or she wishes to cancel or modify the loan disbursement(s).

**Required Action:**

The institution must update its procedures regarding this issue to ensure that students are informed of their right to cancel all or part of their Direct Loan funds within the required time frame. CGTC must provide a copy of its updated procedures to the Department as part of its response to this finding.

**Finding #14: Over Award/Financial Need/Cost of Attendance (COA) Exceeded**

**Citation:**

The cost of attendance is determined by the Higher Education Act, Sec. 472. The law specifies the types of costs that are included in the COA. The COA is the cornerstone of establishing a student's financial need, as it sets limits on the total aid a student may receive. 34 C.F.R. § 668.603, Student Assistance General Provisions, states a school may not certify a Stafford or PLUS loan, or a combination of loans for a loan amount that exceeds the student's estimated cost of attendance for the period of enrollment, less the student's financial assistance for that period; and in the case of a subsidized loan, the expected family contribution for that period.

The general rule in packaging federal student aid is the student's total financial aid and other resources must not exceed the student's financial need. Needs analysis is the process of finding the student's financial need (i.e., the difference between the cost of attendance and the expected family contribution (EFC) and other estimated financial assistance. Before awarding an unsubsidized Stafford Loan, a school must first determine the student's eligibility for a subsidized Stafford Loan. Refer to 2013 FSA Handbook, Chapter 5, Vol. 3.

**Noncompliance:**

Student #18 has a COA of \$11,322 – Expected Family Contribution (EFC) \$0 = \$11,322 (Need). The student received \$5,645 PELL Grant, \$2,930 subsidized loan, and \$4,000 in unsubsidized loan funds. The student was over-awarded his/her COA in the amount of \$1,253.

**Required Action:**

The institution must correct the discrepancies and send proof that the errors have been corrected. Should the corrections result in a change in funding for the student, the institution will be liable for the difference.

**Finding #15: PELL Overpayment/Underpayment**

**Citation:**

34 C.F.R. § 690.62, Federal Pell Grant Program, states the amount of a student's Pell Grant for an academic year is based upon the payment and disbursement schedules published by the Secretary for each award year.

**Noncompliance:**

Student #5 received a PELL grant award in the amount of \$970 for the spring 2013 semester. The student was enrolled in 12 credit hours as a fulltime student, and was eligible to receive \$1,100 in a PELL grant award.

**Required Action:**

The 2012/2013 award year has closed therefore no further actions are required. The institution is reminded to enforce its awarding policies and procedures to ensure this does not reoccur.

**Finding #16: Inaccurate Enrollment Reporting**

**Citation:**

34 C.F.R. § 685.309 (b) states a school shall—

- (1) Upon receipt of a student status confirmation report from the Secretary, complete and return that report to the Secretary within 30 days of receipt; and
- (2) Unless it expects to submit its next student status confirmation report to the Secretary within the next 60 days, notify the Secretary within 30 days if it discovers that a Direct Subsidized, Direct Unsubsidized, or Direct PLUS Loan has been made to or on behalf of a student who—
- (i) Enrolled at that school but has ceased to be enrolled on at least a half-time basis;
  - (ii) Has been accepted for enrollment at that school but failed to enroll on at least a half-time basis for the period for which the loan was intended; or
  - (iii) Has changed his or her permanent address.
- (3) The Secretary provides student status confirmation reports to a school at least semi-annually.
- (4) The Secretary may provide the student status confirmation report in either paper or electronic format.

**Noncompliance:**

Students were identified with late and/or inaccurate enrollment reporting. The table below is a listing of the students that were identified as having enrollment reporting deficiencies during the program review.

<u>Student Number</u>	<u>Status Reported</u>	<u>Certification Date</u>	<u>Reason for Non-Compliance</u>
6	Half Time Withdrawn	8/20/2012 10/7/2013	The reported date (8/20/2012 and 10/7/2013) was over 60 days from the last date reported on 6/14/2012 and 5/13/2013.
7	Withdrawn	10/7/2013	The reported date (10/7/2013) was over 60 days from the last date reported on 5/13/2013.
8	Withdrawn	9/10/2013	The institution reported the student status as withdrawn, the student graduated 5/2/2013. In addition, The reported date (9/10/2013) was over 60 days from the last date reported on 5/13/2013.
9	Half Time	10/7/2013	The reported date (10/7/2013) was over 60 days from the last date reported on 6/11/2013.
18	Withdrawn	1/28/2014	The institution reported the student status

			with an effective date of 12/11/2013. The effective withdrawal date on file is 10/10/2013.
19	Withdrawn	10/7/2013	The institution reported the student status with an effective date of 9/13/2013. The effective withdrawal date on file is 9/5/2013.
21	Full Time	12/18/2013	The institution failed to update the student's enrollment status. The student has an effective withdrawal date of 1/15/2013.
25	Withdrawn	10/7/2013	The institution reported the student status with an effective date of 9/13/2013. The effective withdrawal date on file is 9/3/2013
26	Withdrawn	11/18/2013	The institution reported the student status with an effective date of 10/11/2013. The effective withdrawal date on file is 10/1/2013
28	Withdrawn	11/18/2013	The institution reported the student status with an effective date of 10/23/2013. The effective withdrawal date on file is 10/16/2013
29	Full Time	1/28/2014	The institution reported the student status as full time. The student withdrew on 1/22/2014.
30	Withdrawn	3/10/2013	The institution reported the student status with an effective date of 12/12/2012. The effective withdrawal date on file is 8/26/13.

**Required Action:**

Based upon the error rate of this finding, the school must conduct a file review of enrollment reporting for students who attended CGTC during the 2012/2013 and 2013/2014 award years (excluding students identified in Program Review Sample). CGTC must correct any errors discovered in the file review and report the outcome to the Department as part of CGTC's Program Review Report response. The results of this review must be provided in Excel or a similar spreadsheet format and contain the following fields:

- Student's Name
- Student's SSN
- Enrollment Reporting (Correct or Incorrect)
- Detail Regarding Correction – If Correct – N/A

- Date of Correction
- Reason for Error – N/A if Correct

Please send the file review summary reports (spreadsheets) to Alicia Scott by e-mail at [alicia.scott@ed.gov](mailto:alicia.scott@ed.gov). CGTC must submit a copy of each affected student's corrected NSLDS enrollment history. In addition, CGTC must revise its Enrollment Reporting Policy/Procedures to ensure future compliance. The revised policy/procedures document must be submitted in response to this Program Review Report.

**Finding #17: Exit Counseling Not Documented**

**Citation:**

Pursuant to 34 C.F.R. § 685.304 Counseling borrowers, (b) Exit counseling. (1) A school must conduct exit counseling with each Direct Subsidized or Direct Unsubsidized Loan borrower shortly before the student borrower ceases at least half-time study at the school.

(2) The counseling must be in person, by audiovisual presentation, or by interactive electronic means. In each case, the school must ensure that an individual with knowledge of 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 school may provide the student borrower 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, the school must provide exit counseling 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) In conducting the exit counseling, the school 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 or Direct Unsubsidized Loans for attendance at that school or in the student borrower's program of study;

(ii) Review for the student borrower available repayment options including the standard repayment, extended repayment, graduated repayment, and income contingent repayment plans, and loan consolidation;

(iii) Provide options to the student borrower concerning those debt-management strategies that the school determines would facilitate repayment by the student borrower;

(iv) Explain to the student borrower how to contact the party servicing the student borrower's Direct Loans.

**Noncompliance:**

Students #29 is missing documentation of Loan Exit Counseling.

**Required Action:**

The institution must mail exit counseling materials to the student who have not satisfactorily completed exit counseling. The institution must also institute procedures to ensure all Title IV borrowers receive counseling. A copy of the procedures must be submitted with the institution's response to this finding.

**Finding #18: Inadequate Award Letter/Not Updated**

**Citation:**

34 C.F.R. § 668.165, Notices and authorizations, states that before an institution disburses title IV, HEA program funds for any award year, the institution must notify a student of the amount of funds that the student or his or her parent can expect to receive under each title IV, HEA program, and how and when those funds will be disbursed. If those funds include Direct Loan or FFEL Program funds, the notice must indicate which funds are from subsidized loans and which are from unsubsidized loans.

Except in the case of a post-withdrawal disbursement made in accordance with 668.22(a)(5), if an institution credits a student's account at the institution with Direct Loan, FFEL, Federal Perkins Loan, or TEACH Grant Program funds, the institution must notify the student or parent of—

- (i) The anticipated date and amount of the disbursement;
- (ii) The student's right or parent's right to cancel all or a portion of that loan, loan disbursement TEACH Grant, or TEACH Grant disbursement and have the loan proceeds returned to the holder of that loan, the TEACH Grant proceeds returned to the Secretary. However, if the institution releases a check provided by a lender under the FFEL Program, the institution is not required to provide this information; and
- (iii) The procedures and time by which the student or parent must notify the institution that he or she wishes to cancel the loan, loan disbursement, TEACH Grant, or TEACH Grant disbursement.

The institution must provide the notice described in paragraph (a)(2) of this section in writing—

- (i) No earlier than 30 days before, and no later than 30 days after, crediting the student's account at the institution, if the institution obtains affirmative confirmation from the student under paragraph (a)(6)(i) of this section; or

- (ii) 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.

A student or parent must inform the institution if he or she wishes to cancel all or a portion of a loan, loan disbursement, TEACH Grant, or TEACH Grant disbursement. The institution must return the loan or TEACH Grant proceeds, cancel the loan or TEACH Grant, or do both, in accordance with program regulations provided that the institution receives a loan or TEACH Grant cancellation request and the institution must inform the student or parent in writing regarding the outcome of any cancellation request.

**Noncompliance:**

The institution awarded Title IV funds to the student; however, the institution failed to include funds on the award letter and/or the award letter was not updated.

Students #5, 16, 17, 19, 20, 22, 23, 25, 26, 27, and 29 were missing updated award letters. The students withdrew from the institution and there are no award letters in the students' files indicating the students were notified of changes to awards based on Return to Title IV calculations.

**Required Action:**

The institution must update its procedures regarding this issue to ensure that students are informed of what they are being awarded and ensure updated award letters are in students' files. CGTC must provide a copy of its updated procedures to the Department as part of its response to this finding.

**Finding #19:** No Provision to Opt Out of Pell Book Voucher

**Citation:**

34 C.F.R. § 668.164 (i) states an institution must provide a way for a Federal Pell Grant eligible student to obtain or purchase, by the seventh day of a payment period, the books and supplies required for the payment period if, 10 days before the beginning of the payment period—

(i) The institution could disburse the title IV, HEA program funds for which the student is eligible; and

(ii) Presuming the funds were disbursed, the student would have a credit balance under paragraph (e) of this section.

(2) The amount the institution provides to the Federal Pell Grant eligible student to obtain or purchase books and supplies is the lesser of the presumed credit balance under this paragraph or the amount needed by the student, as determined by the institution.

(3) The institution must have a policy under which a Federal Pell Grant eligible student may opt out of the way the institution provides for the student to obtain or purchase books and supplies under this paragraph.

(4) If a Federal Pell Grant eligible student uses the way provided by the institution to obtain or purchase books and supplies under this paragraph, the student is considered to have authorized the use of title IV, HEA funds and the institution does not need to obtain a written authorization under paragraph (d)(1)(iv) of this section and §668.165(b) for this purpose.

The 2013-2014 Federal Student Aid Handbook, Volume 4, Chapter 2, pp. 48, states a student may decline to participate (opt out) in the way a school provides for obtaining books and supplies. For instance, if a school provides a bookstore voucher, the student may opt out by not using the voucher. If the school provides the funds using a stored-value or prepaid debit card, the school must have a procedure through which the student may opt out. For example, a school may require a student to notify the school by a certain date so that the school does not unnecessarily issue a check to the student or transfer funds to the student's bank account. If the student opts out, the school may, but is not required to, offer the student another way to purchase books and supplies as long as it does not otherwise delay providing funds to the student as a credit balance.

A school is required to provide, in its financial aid information and in its notifications provided to students receiving FSA funds, information on the way the school provides for Federal Pell Grant eligible students to purchase required books and supplies by the seventh day of a payment period under certain conditions and how the student may opt out. The information must indicate whether the school will enter a charge on the student's account at the school for books and supplies or pay funds to the student directly. Also, during the aid counseling process, the school must explain to a student who qualifies for the funds advanced to purchase books and supplies how the method is handled at the school and how a student may opt out.

**Noncompliance:**

The institution does not have a documented policy containing information on the way the school provides for Federal Pell Grant eligible students to purchase required books and supplies by the seventh day of a payment period under certain conditions and how the student may opt out.

**Required Action:**

CGTC must update its procedures regarding this issue to ensure that students are informed of the a student's option to opt out of charging books and supplies to their student account. CGTC must provide a copy of its updated procedures to the Department as part of its response to this finding.

#### **D. Recommendations**

The following are recommendations based upon observations made by the reviewer during the program review. CGTC is not required to provide a response to, nor is CGTC required to act upon, these recommendations. However, the review team believes that adoption of this/these recommendation(s) will assist the institution in its administration of Title IV, HEA program funds.

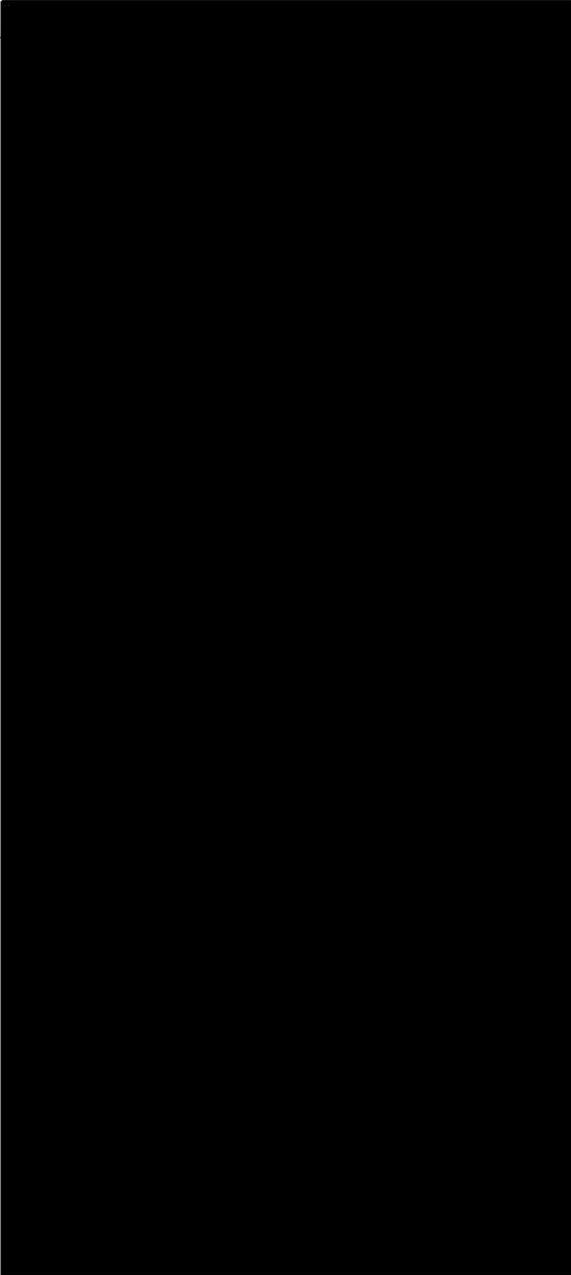
During the review, the institution was unable to provide complete files to the reviewers in a timely manner. It is recommended that the institution implement internal controls to prevent this from occurring again. The staff and administration indicated that since the merger, the institution has implemented an electronic scanning system.

The institution is reminded that it must become more diligent in its efforts to ensure that all required data needed to determine a student's Title IV eligibility are maintained and easily accessible.

Finally, as part of its Direct Loan process, the institution certifies Direct Loans based on earned hours in a student's current major for students who have a change of major. The institution should update its policy/procedures and publication to students to include this process.

**E. Appendices**

**Appendix A: Student Sample**



**Appendix B: Statistical Sample (will be electronically sent to school)**

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Final Program Review Determination  
PRCN #: 201420428534

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Appendix F  
Cost of Funds



**Late or Unmade Returns (Non-Loan) - Cost of Funds**

Name of Institution: Central Georgia technical College Appendix F

No.	Description/Name	Return Amount	Program	W/D Date	Institution Det Date	Return Paid Date	Return Due Date	Days Late	Imputed CVFR	Federal Share	To ED	To Inst Accounts
F2	W & F											
	Fall 1213 AY	\$1,093.35	Pell Grant	10/03/12	10/3/2012	10/16/2012	11/17/12	0	1.00%	\$ 1,093.35	\$ -	\$ -
	Spring 1213 AY	\$4,919.39	Pell Grant	02/12/13	2/12/2013	5/14/2013	03/29/13	46	1.00%	\$ 4,919.39	\$ 6.20	\$ -
	Summer 1213 AY	\$1,387.26	Pell Grant	06/24/13	6/24/2013	9/6/2013	08/08/13	29	1.00%	\$ 1,387.26	\$ 1.10	\$ -
	All F											
	Fall 1213 AY	\$84,167.00	Pell Grant	06/30/13	6/30/2013	2/24/2014	08/14/13	194	1.00%	\$84,167.00	\$ 447.40	\$ -
	Spring 1213 AY	\$69,673.92	Pell Grant	06/30/13	06/30/13	02/24/14	09/14/13	194	1.00%	\$69,673.92	\$ 370.36	\$ -
	Summer 1213 AY	\$31,622.46	Pell Grant	06/30/13	06/30/13	02/24/14	06/14/13	194	1.00%	\$31,622.46	\$ 168.09	\$ -
	MGTC											
	Fall 1213 AY	\$1,955.10	Pell Grant	10/24/12	10/24/12	09/16/14	12/09/12	647	1.00%	\$ 1,955.10	\$ 34.65	\$ -
	Spring 1213 AY	\$1,284.88	Pell Grant	03/07/13	03/07/13	09/16/14	04/21/13	513	1.00%	\$ 1,284.88	\$ 18.06	\$ -
	Summer 1213 AY	\$46.40	Pell Grant	05/24/13	05/24/13	08/08/14	07/08/13	396	1.00%	\$ 46.40	\$ 0.50	\$ -

Total Returns	\$196,149.76
Total Campus-Based	\$ -
Totals By Program:	
Pell Grant	\$196,149.76
FSEOG	\$ -
Perkins	\$ -
ACG	\$ -
SMART	\$ -
TEACH	\$ -
FSEOG-No Match	\$ -
Perkins-No Match	\$ -

Totals \$ 1,046.37 \$ -

<b>Interest Breakdown</b>	
Pell Grant	\$ 1,046.37 \$ -
FSEOG	\$ - \$ -
Perkins	\$ - \$ -
ACG	\$ - \$ -
SMART	\$ - \$ -
TEACH	\$ - \$ -
FSEOG-No Match	\$ - \$ -
Perkins-No Match	\$ - \$ -

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Appendix G  
Cost of Funds



**Late or Unmade Returns (Non-Loan) - Cost of Funds**

Name of Institution: Central Georgia Technical College Appendix C

No.	Description/Name	Return Amount	Program	W/D Date	Institution Det Date	Return Paid Date	Return Due Date	Days Late	Imputed CVFR	Federal Share	To ED	To Inst Accounts
F3	1213 AY MGTC											
		\$1,193.25	Pell Grant	02/13/13	2/13/2013	5/2/2013	03/30/13	33	1.00%	\$ 1,193.25	\$ 1.08	\$ -
		\$302.80	Pell Grant	02/12/13	2/12/2013	5/2/2013	03/29/13	34	1.00%	\$ 302.80	\$ 0.28	\$ -
		\$830.65	Pell Grant	03/06/13	3/6/2013	5/9/2013	04/29/13	19	1.00%	\$ 830.65	\$ 0.43	\$ -
		\$333.36	Pell Grant	02/05/13	2/5/2013	5/9/2013	03/22/13	48	1.00%	\$ 333.36	\$ 0.44	\$ -
		\$371.85	Pell Grant	03/11/13	3/11/2013	5/9/2013	04/25/13	14	1.00%	\$ 371.85	\$ 0.14	\$ -
		\$296.78	Pell Grant	06/11/13	6/11/2013	8/1/2013	07/26/13	6	1.00%	\$ 296.78	\$ 0.05	\$ -
		\$375.98	Pell Grant	05/31/13	5/31/13	08/01/13	07/15/13	17	1.00%	\$ 375.98	\$ 0.18	\$ -
		\$289.37	Pell Grant	06/12/13	6/12/13	08/06/13	07/27/13	10	1.00%	\$ 289.37	\$ 0.08	\$ -
		\$281.97	Pell Grant	06/13/13	6/13/13	08/06/13	07/28/13	9	1.00%	\$ 281.97	\$ 0.07	\$ -
		\$1,100.59	Pell Grant	09/18/12	09/18/12	12/06/12	11/02/12	34	1.00%	\$ 1,100.59	\$ 1.03	\$ -
		\$1,404.88	Pell Grant	06/05/13	6/05/13	08/06/13	07/29/13	17	1.00%	\$ 1,404.88	\$ 0.65	\$ -
F3	1213 AY CGTC											
		\$58.12	Pell Grant	08/24/12	08/24/12	02/24/14	10/08/12	504	1.00%	\$ 58.12	\$ 0.80	\$ -
		\$17.09	Pell Grant	08/24/12	08/24/12	02/24/14	10/08/12	504	1.00%	\$ 17.09	\$ 0.24	\$ -
		\$26.90	Pell Grant	08/23/12	08/23/12	02/24/14	10/07/12	505	1.00%	\$ 26.90	\$ 0.37	\$ -
		\$227.47	Pell Grant	09/06/12	09/06/12	02/24/14	10/21/12	491	1.00%	\$ 227.47	\$ 3.06	\$ -
		\$227.47	Pell Grant	09/06/12	09/06/12	02/24/14	10/21/12	491	1.00%	\$ 227.47	\$ 3.06	\$ -
		\$62.82	Pell Grant	09/06/12	09/06/12	02/24/14	10/21/12	491	1.00%	\$ 62.82	\$ 0.85	\$ -
		\$202.04	Pell Grant	09/05/12	09/05/12	02/24/14	10/20/12	492	1.00%	\$ 202.04	\$ 2.72	\$ -
		\$49.84	Pell Grant	08/28/12	08/28/12	02/24/14	10/12/12	500	1.00%	\$ 49.84	\$ 0.68	\$ -
		\$214.52	Pell Grant	08/29/12	08/29/12	02/24/14	10/13/12	499	1.00%	\$ 214.52	\$ 2.93	\$ -
		\$190.02	Pell Grant	09/04/12	09/04/12	02/24/14	10/19/12	493	1.00%	\$ 190.02	\$ 2.57	\$ -
		\$37.93	Pell Grant	08/24/12	08/24/12	02/24/14	10/08/12	504	1.00%	\$ 37.93	\$ 0.52	\$ -
		\$28.18	Pell Grant	08/27/12	08/27/12	02/24/14	10/11/12	501	1.00%	\$ 28.18	\$ 0.39	\$ -
		\$214.99	Pell Grant	09/05/12	09/05/12	02/24/14	10/20/12	492	1.00%	\$ 214.99	\$ 2.90	\$ -
		\$143.38	Pell Grant	09/05/12	09/05/12	02/24/14	10/20/12	492	1.00%	\$ 143.38	\$ 1.93	\$ -
		\$123.03	Pell Grant	09/04/12	09/04/12	02/24/14	10/19/12	493	1.00%	\$ 123.03	\$ 1.66	\$ -

Total Returns	\$ 8,605.26
Total Campus-Based	\$ -
Totals By Program	
Pell Grant	\$ 8,605.26
FSEOG	\$ -
Perkins	\$ -
ACG	\$ -
SMART	\$ -
TEACH	\$ -
FSEOG-No Match	\$ -
Perkins-No Match	\$ -

Totals \$ 29.11 \$ -

<b>Interest Breakdown</b>	
Pell Grant	\$ 29.11 \$ -
FSEOG	\$ - \$ -
Perkins	\$ - \$ -
ACG	\$ - \$ -
SMART	\$ - \$ -
TEACH	\$ - \$ -
FSEOG-No Match	\$ - \$ -
Perkins-No Match	\$ - \$ -

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Appendix H  
Cost of Funds





**Accounting Document – Prior Year Monetary Recovery (AD-PYMR)**

**Institution:** Central Georgia Technical College

**City, State:** Warner Robins, GA

**PRCN:** 420428534

**TIN:** 586000191

**DUNS:** 039497417

**Reviewer:** Alicia Scott

**Region:** IV

**Date:** July 07, 2015

**Section A - Use if no adjustments are being made in COD**

Programs	Type	Amount	Funding Code	Object Class
Federal Pell Grant (Closed AY)	Principal		3220RNOYR	69017
	Interest	\$1,081	1435RNOYR	64020
ACG	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
National SMART	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
FSEOG (No FISAP Corrections)	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
FWS (No FISAP Corrections)	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
Direct Loan and Direct Loan EAL /COF	Principal		4253XNOYR	53020 or 53010
	Interest	\$731	4253XNOYR	53040
FFEL and FFEL EAL	Interest/ SA/EAL		4251XNOYR	53020
Federal Perkins	Principal		2915RNOYR	53054

**Section B: Use if the Institution is instructed to make adjustments in COD**

Add rows if necessary			Amount			G5 Program Award # *
Pell	2012- 2013	Principal	\$1,824	3875FNOYR	69020	P063P122783
	2012- 2013	Imputed Interest	\$0	1435RNOYR	64020	
Direct Loan (do not use for estimated loss)	2013- 2014	Principal	\$1,304	3875FNOYR	69020	P063P132783
	2013- 2014	Imputed Interest	\$0	4253XNOYR	53040	

Comments:

\* G5 Award # (P063P104306, first 5 digits = program, next 2 digits = award year, next 4 digits = code unique to school). Note: It is important that the year in the G5 award number correspond to the award year for which any adjustments are being made, or for which the balance has been incurred (in the case of an unsubstantiated cash or negative cash balance). If the reviewer is unsure after looking in G5, contact Susan Lewey for Pell or DL, or Tremia Haythe for FWS or FSEOG.

Example of G5 award numbers for a single school for the 2009-2010 award year, Pell vs. DL:

Pell is designated by "P063P" and DL is designated by "P268K"

P063P091445 (Pell 2009-2010 award - Pell uses the final two digits of the leading award year in the award number)

P268K101445 (Direct Loan 2009-2010 award - DL uses the final two digits of the trailing award year in the award number)

Example of G5 award number for FWS and FSEOG

FWS is designated by "P033A" and FSEOG is designated by "P007A"

P033A092121 (FWS 2009-2010 award - FWS uses the final two digits of the leading award year in the award number)

P007A092121 (FSEOG 2009-2010 award - FSEOG uses the final two digits of the leading award year in the award number)

See FPRD Distribution Form for distribution information for this form and related program review documents.