



UNITED STATES DEPARTMENT OF EDUCATION

Federal Student Aid – School Eligibility Channel

Atlanta Case Management Team

61 Forsyth Street SW, Room 18T20B

Atlanta, GA 30303-3104

Phone (404) 562-6315

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December 3, 2004

Dr. Vivian Presley, President
Coahoma Community College
3240 Friars Point Road
Clarksdale, MS 38614-9799

CERTIFIED MAIL
70012510000454769564

RETURN RECEIPT REQUESTED

**Revised Final Program Review Determination
Letter**

PRCN: 2004-204-22814

OPEID #00240100

Dear Dr. Presley:

On November 1, 2004, a Final Program Review Determination letter (FPRD) was mailed to your institution. The FPRD listed four students in Finding 5 of the report who were counted twice, initially during the program review and subsequently during the school's file review.

This revised FPRD eliminates the duplication of the liabilities associated with these four students, and it reduces the institution's liability from \$114,237 to \$96,087. Also, due to the reduced liability, the repayment instructions in the report have changed. The revised report is as follows:

On March 8, 2004 through March 12, 2004, Ms. Pamela Thompson and Mr. Oscar Howard conducted a review of Coahoma Community College's delivery of the U.S. Department of Education's, Title IV, Federal Student Aid (FSA) Programs as administered by your institution. The focus of the review was to determine the institution's compliance with Title IV policies and procedures, student financial aid and academic files, fiscal records, student ledgers and financial aid reports.

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning the institution's specific practices and procedures must not be construed as acceptance, approval or endorsement of those practices and procedures. Furthermore, it does not relieve the institution of its obligations to comply with all statutory and regulatory provisions governing the Title IV programs.

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The purpose of this letter is to identify the liabilities that result from the review, provide instructions for payment of these liabilities to the Department of Education, notify the institution of its right to appeal, and close the program review.

We have reviewed the school's response to the program review report. The school has taken corrective action to resolve findings 1, 2, 3, 4, 6, 7 and 8 and these findings are considered closed. Deficiencies were identified for finding 5, and liabilities have been assessed for this finding.

The report references the program review finding to the applicable regulations and specifies the action required to comply with statutes and regulations. The institution must instruct its independent auditor to review and comment in the institution's next non-federal audit on the deficiency and the corrective action noted in the program review report.

APPEAL PROCEDURES

This constitutes the Department's final program review determination with respect to the liabilities identified from the March 8, 2004 through March 12, 2004 program review. If your institution wishes to appeal to the Secretary for a review of monetary liabilities established by this final program review determination, you must file a written request for an administrative hearing. The Department must receive your request no later than **forty-five (45) days** from the date you receive this letter. The institution must enclose with its appeal request **an original and four copies of the information submitted**, and must send the appeal request by regular, overnight or courier mail to:

Ms. Mary Gust, Director
Administrative Actions and Appeals Division
U.S. Department of Education
FSA/Schools Channel/CMO
830 First Street, NE UCP3, Room 83E1
Washington, D. C. 20202-5267

Your institution's appeal request must indicate the findings, issues and facts you dispute, state the institution's position together with pertinent facts and reasons supporting its position, include all documentation it believes the Department should consider in support of the appeal, and include a copy of this final program review determination.

If your institution's appeal request is complete and made on a timely basis, the Department will schedule an administrative hearing in accordance with Section 487 (b)(2) of the Higher Education Act of 1965, as amended (HEA), 20 USC 1094(b)(2). The procedures followed with respect to your institution's appeal will be those provided in 34 CFR Part 668, Subpart H.

Program records relating to the period covered by this program review must be retained until the **later of**: resolution of the loan(s), claim(s) or expenditure(s) questioned in the

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program review, 34 CFR 668.24(e)(3)(i), or the end of the retention period applicable to the record under 34 CFR 668.24(e)(1) and (e)(2).

Finding 5: Students Not Meeting Satisfactory Progress (SAP) Standards

The school's satisfactory academic progress states that at the end of each semester a student must have completed a certain number of cumulative hours and have a certain cumulative GPA as follows:

Semester	Hours	GPA
1	6 hours	1.0
2	12 hours	2.0
3	20 hours	2.0
4	35 hours	2.0
5	50 hours	2.0
6	64 hours	2.0

A student must maintain a 2.0 by the third semester.

According to the Standards of Satisfactory Academic Progress (SAP) policy published in the school's catalog on pages 36-37, when a student does not meet SAP standards of minimum hours and GPA at the end of a semester, the student is placed on temporary probation for the following semester. Then, if the student is not meeting the GPA minimum hours at the end of that semester, the student is academically suspended for the next semester. If he is still not meeting the standards, the student is suspended from school. Financial aid is not suspended during temporary probation or during final probation.

Following students were not meeting the SAP standards set by the institution:

Student 1: Did not maintain a 2.0 by the end of the Fall 2001 semester, which was his third semester. He did not complete the 20 hours required. At the end of the Fall 2001 semester, his cumulative grade point average (gpa) was only 1.681, and he had only 17 hours of an attempted 47 hours.

Student 2: Did not maintain a 2.0 by the end of the fall 2002 semester, at which time he was suspended after the fall 2002 semester, at which time he had only 17 hours of an attempted 47 hours. He had a cumulative GPA of 1.921. Since the student should have maintained a 2.0, and had a GPA of 1.921, he was suspended. He had previously and since the fall 2002 semester, at which time he was suspended, he had a cumulative GPA of 1.470, 1.640, and 1.640. He was ineligible for aid during spring 2003, fall 2003, and fall 2003, and he was ineligible for aid during spring 2003, fall 2003, and fall 2003. He also exceeds the maximum time frame of 150% to complete the program. He attended 8 semesters in a 4 semester program with only 40 hours of attempted hours. He did not appeal.

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Student 8 received \$2,000 in Federal Pell Grant funds for the spring 2003 semester, \$2,025 in Federal Pell Grant funds for the fall 2003 semester, and \$2,025 for the spring 2004 semester. The funds received for student 8 are ineligible. This student is included in the school's file review for this finding.

Student 20

Student 20 started school in August 1996 and attended through August 1997. At that time, spring term 1997, he was not making satisfactory academic progress and should have been on temporary probation for the fall 1997 semester. His GPA was only .666 at the end of the spring 1997 semester. The student re-entered school in the fall 2001 semester and received financial aid. He should have been placed on final probation upon re-entry in the fall 2001 semester, and since he did not improve his GPA at the end of that semester, GPA dropped to .390, he should have been suspended. The student was ineligible for financial aid during the fall 2002, spring 2003 and spring 2004 semesters. This student filed no appeal.

The student received \$4,000 in Federal Pell Grant funds for the 2002-2003 award year and \$2,025 for the 2003-2004 award year. The funds received for student 20 are ineligible. This student is included in the school's file review for this finding.

Student 22

Student 22 did not maintain a 2.0 GPA for the fall 2001 semester, which was his third semester. At the end of the fall 2001 semester, the student's GPA was 1.268. He should have been placed on temporary probation when he returned to school for the fall 2002 semester, and then placed on final probation during the Spring 2003 semester when he again failed to meet the required GPA. The student's GPA at the end of the fall 2002 semester was 1.377. He should have been suspended at the end of the spring 2003 semester since his GPA was still only 1.537. The student was not placed on probation at all. The student was ineligible for financial aid during the fall 2003 and spring 2004 semesters. This student filed no appeal.

Student 22 received \$4,050 in Federal Pell Grant funds for the 2003-2004 award year. The funds received for student 22 are ineligible. This student is included in the school's file review for this finding.

Student 26

Student 26 did not maintain a 2.0 GPA at the end of the spring 2002 semester, which was the end of his fourth semester. At the end of the spring 2002 semester, the student's GPA was 1.914. The student withdrew during the Fall 2002 semester, but re-enrolled in the spring 2003 semester and should have been placed on temporary probation at the time of re-enrollment. Since he did not improve his GPA during the spring 2003 semester, and since the GPA dropped to 1.659, he should have been placed on final probation during the fall 2003 semester. The student had a 1.946 GPA for the fall 2003 semester, but still

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failed to meet the required 2.0. He should have been suspended for the spring 2004 semester. There is no indication that the student was placed on probation or suspended. He also did not appeal.

Student 26 received \$2,025 in Federal Pell Grant funds for the spring 2004 semester. The funds received for student 26 are ineligible. The student is included in the school's file review for this finding.

Reference: 34CFR 668.16, Student Assistance General Provisions

Requirement:

The school's satisfactory academic policy must include a qualitative component, which consists of grades, work projects completed, or comparable factors that are measurable against a norm.

It also must include a quantitative component that consists of maximum timeframe in which a student must complete his or her educational program. The timeframe must be no longer than 150 percent of the published length of the program.

The school officials implemented procedures to more closely monitor the cumulative grade point average and the percentage of attempted coursework for each student in order to comply with the school's satisfactory academic progress policy.

In addition, they completed a file review of the 2002-2003 and 2003-2004 award years to determine if other students were paid Title IV funds during periods of time when the student was not making satisfactory academic progress according to the school's policy. The review identified 28 students who were paid a total of \$93,082 in Federal Pell Grant funds and \$3,005 in Federal Work Study funds during periods in which they were ineligible due to not meeting the SAP standards (Coahoma Community College File Review - Attachment 2).

Students 8, 20, 22 and 26 in the program review sample did not meet the SAP standards, and liabilities total \$18,150 in Federal Pell Grant funds for these four students.

REPAYMENT INSTRUCTIONS

As a result of our review of the findings in the program review report, the liabilities due directly to the Department of Education are as follows:

Finding 5, page 3 – Federal Pell Grant Program	\$93,082
Federal Work Study Program	<u>\$ 3,005</u>
	\$96,087

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The institution must repay the Department of Education \$96,087 with a check made payable to the U.S. Department of Education, within 45 days of the date of the letter, mailed to:

U.S. Department of Education
P O. Box 952226
St. Louis, MO 63195-2226

To properly identify your institution's payment and to ensure that the institution receives credit for the payment, please include the following information on the check and accompanying documents:

Amount: \$96,087
TIN: 640437624
DUNS: 073528937
PRCN: 2004-204-22814

If ED does not receive payment within the 45-day period, interest will accrue in monthly increments until the date of receipt of your payment. If you have any questions regarding interest accruals or payment credits, you may telephone (202) 377-3843 and ask to speak to your institution's account representative.

If within forty-five days of the date of this letter, your institution has neither made payment in accordance with these instructions nor entered into an arrangement to repay the liability under terms satisfactory to the U.S. Department of Education, the Department intends to collect the amount due and payable by administrative offset against payments due your organization from the Federal Government. **Your institution may object to the collect by offset only by challenging the existence or the amount of the debt.** Your institution makes this challenge by timely appealing this determination under the procedures described in the "Appeal Procedures" section of this 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 in 34 CFR Sec. 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.

If full payment cannot be made within 45 days of the date of this letter, contact the Dept Management Group on (202) 377-3843 to apply for a payment plan. Interest charges and other conditions may apply. Written request may be sent to:

U.S. Department of Education
OCFO Debt Management Group
Attn: Nancy Hoglund
400 Maryland Avenue, SW
Room UCP 21K4

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Washington, DC 20202-4450

I would like to express my appreciation for the courtesy and cooperation extended to my staff during the review. If you have any questions concerning this report, please contact Pamela Thompson at 404-562-6311.

Sincerely,

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

Charles L. Engstrom, Area Case Director
School Participation Team, SC-Atlanta
School Eligibility Channel
Federal Student Aid Programs

cc: Southern Association of Colleges and Schools (SACS)
Ms. Patricia Brooks, Financial Aid Director