

Index Sheet

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Rec Date:

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School Year: 2013

ACN:

PRCN: 201130427693

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January 28, 2013

Gail Little
President
Cobb Beauty College
3096 Cherokee Street
Kennesaw, GA 30144-2828

UPS:
1ZA5467Y0199899741

RE: **Final Program Review Determination**
OPE ID: 03090600
PRCN: 201130427693

Dear Ms. Little:

The U.S. Department of Education's (Department's) School Participation Division - Atlanta issued a program review report on April 12, 2012 covering Cobb Beauty College's (CBC's) administration of programs authorized by Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 *et seq.* (Title IV, HEA programs), for the 2009-2010 and 2010-2011. CBC's response was received on July 1, 2012. CBC failed to address adequately findings 3 of the 11 findings, as detailed in the attached report. A copy of the program review report (and related attachments) and the institution's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by CBC upon request. The Department has made final determinations based on information obtained during the program review and from documentation already submitted by CBC. This Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

Purpose:

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

The total liabilities due from the institution from this program review are \$13,301.00. This final program review determination contains detailed information about the liability determination for all findings.

Federal Student Aid

An OFFICE of the U.S. DEPARTMENT of EDUCATION

School Participation Division - Atlanta

61 Forsyth Street, SW, Atlanta, GA 30303

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, Program Review Report.

Appeal Procedures:

This constitutes the Department's FPRD with respect to the liabilities identified from the April 12, 2012 program review report. If CBC wishes to appeal to the Secretary for a review of monetary liabilities established by the FPRD, the institution must file a written request for an administrative hearing. The Department must receive the request no later than 45 days from the date CBC receives this FPRD. An original and four copies of the information CBC submits must be attached to the request. The request for an appeal must be sent to:

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

CBC'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 CBC's appeal will be those provided in 34 C.F.R. Part 668, Subpart H. **Interest on the appealed liabilities shall continue to accrue at the applicable value of funds**

rate, as established by the United States Department of Treasury, or if the liabilities are for refunds, at the interest rate set forth in the loan promissory note(s).

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. §§ 668.24(e)(1), (e)(2), and (e)(3).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact Sherry Blackman at 404-974-9287. Questions relating to any appeal of the FPRD should be directed to the address noted in the Appeal Procedures section of this letter.

Sincerely,

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

Charles Engstrom
Division Director

Enclosure:
Protection of Personally Identifiable Information

cc: David Neace, Financial Aid Administrator
Georgia State Board of Cosmetology
Council on Occupational Education

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

Cobb Beauty College

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

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the AMERICAN MIND™

OPE ID 03090600

PRCN 201130427693

Prepared by

U.S. Department of Education

Federal Student Aid

School Participation Division - Atlanta

Final Program Review Determination
January 28, 2013

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A. Institutional Information

Cobb Beauty College
3096 Cherokee Street
Kennesaw, GA 30144-2828

Type: Proprietary

Highest Level of Offering: Certificate

Accrediting Agency: Council on Occupational Education

Current Student Enrollment: 46 (2011-2012)

% of Students Receiving Title IV, HEA funds: 85% (2011-2012)

Title IV, HEA Program Participation PEPS:

	2010-2011
Pell Grant	\$186,138.00
William D. Ford Federal Direct Loan Program	\$305,194.00

Default Rate FFEL/DL:	2010	4.4%
	2009	3.1%
	2008	2.1%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Cobb Beauty College (CBC) from June 27, 2011 to July 1, 2011. The review was conducted by Sherry Blackman and Keith Brown.

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

A sample of 30 files was identified for review from the 2009-2010 and 2010-2011 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 April 12, 2012.

Disclaimer:

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

CBC has taken the corrective actions necessary to resolve findings 1, 2, 3, 4, 5, 6, 9, and 10 of the program review report. Therefore, these findings may be considered closed. Please see Appendix A. Findings requiring further action by CBC are discussed below.

Findings with Final Determinations

The program review report finding(s) requiring further action are summarized below. At the conclusion of each finding is a summary of CBC's response to the finding, and the Department's final determination for that finding. A copy of the program review report issued on April 12, 2012 is attached as Appendix A.

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

Finding 7: Failure to Document Professional Judgment

Citation: HEA Sec. 479A(a) IN GENERAL. An aid administrator may use professional judgment (PJ), on a case-by-case basis only, to alter the data used to calculate the EFC. This alteration is valid only at the school making it. The institution must submit a PJ change electronically, via FAA Access to CPS Online or third-party software, and may do it without a signature from the student or parent. In FAA Access, the institution must select "EFC adjustment requested" for the professional judgment field. The next ISIR will indicate "Professional judgment processed."

The reason for the adjustment must be documented in the student's file, and it must relate to the special circumstances that differentiate him—not to conditions that exist for a whole class of students. The institution can also use professional judgment to adjust the student's cost of attendance. The institution must resolve any inconsistent or conflicting information shown on the output document before making any adjustments. An aid administrator's decision regarding adjustments is final and cannot be appealed to the Department. 2010-2011 Application and Verification Guide, Chapter 5, p. 104.

Noncompliance: The institution failed to adequately document why professional judgment was conducted for the following student:

Student #2: According to a Professional Judgment (PJ) Form in the student's file, a loss of income occurred for the parent. This student was selected for verification for the 2009-2010 award year.

There was no supporting documentation (divorce decree, unemployment letter, written statement from the student, W-2 form, etc.) in the student's file to support the circumstances for PJ. CBC's PJ form states that supporting documentation is required for all circumstances. Student #2 received \$5,300 in Federal Pell Grant funds.

Required Action: The institution had to revise its policy on performing future professional judgments to correspond to regulations and submit evidence of the revision to this office. Also, the institution was required to resolve any conflicting information and provide the adequate supporting documentation to this office for student #2 to support the circumstances that caused the institution to perform PJ.

CBC's Response: Student #2 received a modification in her adjusted gross income as a result of her mother's unemployment. At the time of the judgment, the mother and student submitted a written request for his professional judgment and a copy of one of the mother's unemployment checks. These documents were referenced in the letter of professional judgment that the school entered into her financial aid file. The school has made several

attempts to contact the student and her mother by phone, e-mail, and direct mail in an attempt to get additional copies of these documents. Enclosed with her response to this finding are copies of our attempts to communicate with the student. We have been unable to get the student or her mother to respond to any of these communication attempts.

HEA Sec. 479A(a) allows that an aid administrator may use professional judgment on a case by case basis. There are no specific standards as to the exact documentation that must be provided by the student but rather that the judgment of the aid administrator must be documented. The school claims they did precisely that in this instance and referenced the exact documents that were used to arrive at that decision in their letter which was in the file. School officials firmly believe that they followed all rules and regulations regarding this situation and were fully in compliance regarding this finding. School officials disagree that any refund is due in regard to this particular finding.

Final Determination: In cases where an institution uses Professional Judgment, supporting documentation is required. Whatever documentation was used to support the PJ for student # 2 should be maintained in the student's file. Please see the citation below:

HEA Sec. 479A(a) IN GENERAL—Nothing in this part shall be interpreted as limiting the authority of the financial aid administrator, **on the basis of adequate documentation**, to make adjustments on a case-by-case basis to the cost of attendance or the values of the data items required to calculate the expected student or parent contribution (or both) to allow for treatment of an individual eligible applicant with special circumstances. However, this authority shall not be construed to permit aid administrators to deviate from the contributions expected in the absence of special circumstances. Special circumstances may include tuition expenses at an elementary or secondary school, medical, dental, or nursing home expenses not covered by insurance, unusually high child care or dependent care costs, recent unemployment of a family member or an independent student, a student or family member who is a dislocated worker (as defined in section 101 of the Workforce Investment Act of 1998), the number of parents enrolled at least half time in a degree, certificate, or other program leading to a recognized educational credential at an institution with a program participation agreement under section 487, a change in housing status that results in an individual being homeless (as defined in section 103 of the McKinney-Vento Homeless Assistance Act), or other changes in a family's income, a family's assets or a student's status. Special circumstances shall be conditions that differentiate an individual student from a class of students rather than conditions that exist across a class of students. Adequate documentation for such adjustments shall substantiate such special circumstances of individual students. In addition, nothing in this title shall be interpreted as limiting the authority of the student financial aid administrator in such cases (1) to request and use supplementary information about the financial status or personal circumstances of eligible applicants in selecting recipients and determining the amount of awards under this title, or (2) to offer a dependent student financial assistance under section 428H or a Federal Direct Unsubsidized Stafford Loan without requiring the parents of such student to file the financial aid form prescribed under section 483 if the student financial aid administrator verifies that the parent or parents of such student have ended financial

support of such student and refuse to file such form. No student or parent shall be charged a fee for collecting, processing, or delivering such supplementary information.

Because the institution failed to provide the supporting documentation required for Professional Judgment for student #2, the institution is required recalculate the student's financial aid award based on the student's original EFC. The student received \$5,300.00 in Pell grant funds and \$3,500.00 in subsidized loan funds for the 2009-2010 award year. All funds are to be returned to the Department.

Finding 8: Incomplete Verification

Citations: (34 C.F.R. §§ 668.16 [ff], 668.51 through 668.61, and the U.S. Department of Education's Application and Verification Guide.) The purpose of verification is to ensure that Title IV funds are awarded to student applicants in the correct amount.

Students are selected for verification on the basis of application edits specified by the Secretary. An institution must establish procedures to request, receive, and verify applicant data for each award year. Institutions are also responsible for resolving conflicting information related to a student's application for federal student aid. There are five required data elements that must be verified. These five items are:

- *Household size (HHS);*
- *Number enrolled in college;*
- *Adjusted Gross Income (AGI);*
- *U.S. income tax paid; and,*
- *Other untaxed income and benefits.*

Supporting documentation collected from the student (and parents or spouse) is compared to the information reported on the student's Institutional Student Information Record (ISIR). Verification documentation collected must be retained in the student's file as evidence that the process was completed.

Noncompliance: *The institution failed to accurately verify and complete verification for the following students who were selected for verification: Also below are instances of conflicting information in the student's file, which appear to be unresolved.*

Student #18: *The 2010-2011 Dependent Verification Worksheet is incomplete. The student failed to sign the form. Also, the parent's 2009 Income Tax Return was not in the financial aid file. Therefore, the reviewers could not verify if verification had been completed. Student #18 received \$2,625 in Federal Pell Grant funds.*

Student #22: *The 2010-2011 ISIR revealed that the student's AGI was \$37,274 but the 2009 tax return revealed that the AGI was \$55,551. Verification was not performed on this student. The student received \$5,100 in Pell.*

Student #23: *The 2010-2011 ISIR revealed that the student's AGI was \$36,011 but the 2009 tax return revealed that the AGI was \$13,369. Verification was not performed on this student. The student received \$2,345 in Pell.*

Student #24: *The student's 2009 tax return is not signed by the student or spouse. Verification is considered incomplete. The student received \$5,550 in Pell and \$3,500 in a subsidized loan.*

Required Action: *The institution had to resolve the verification deficiencies and demonstrate that verification has been properly completed for the students referenced above. If any student's EFC, scheduled award and expected disbursements changed as a result of verification, the institution would be liable for the difference between the correct disbursement and the actual disbursement.*

The institution also had to develop and submit with its response, procedures which will ensure that all students selected for verification will be verified accurately and in accordance with Title IV policies.

Additionally, due to the high percentage of errors discovered during the 2010-2011 award year CBC had to review the file of every student selected for verification during that year to determine if the process was properly completed for all selected students.

If applicant information varied from data reported on the student's ISIR, the EFC had to be recalculated for that student. If the revised EFC results in a change to the amount of Federal Pell Grant, and/or Subsidized Loan disbursed to the student, CBC had to report the difference between the correct and incorrect amount for each program.

CBC also had to must engage an Independent Public Accountant (IPA) to test the file review completed by CBC.

CBC's Response: In regards to the specific students referenced in this finding:

- Student # 18 has signed her Dependent Verification Worksheet and submitted a copy of her parent's Income Tax Return. These documents are enclosed with the response to this finding.
- Student # 22 received a professional judgment changing her AGI from \$55,551 to \$37,274. Enclosed with the response to this finding are all of the documents related to that professional judgment.

- Student #23 had all of the proper documentation in her file. The auditors were incorrect in their statement that the AGI was actually \$13,369. The auditor looked at the line for itemized deductions rather than at the line for AGI which was indeed \$36,011. Enclosed with the response to this finding is a copy of the tax return. This document is enclosed with the response to this finding.
- Student #24 and her spouse have signed their tax return. This document is enclosed with the response to this finding.

As part of the response to this finding, the school engaged the services of an Independent Public Accountant to conduct a file review of all students in the 2009-2010 and 2010-2011 award years. The result of this finding, which is also enclosed, was that there were no exceptions in any of the files for any student in either award year.

We have provided with the response to this particular finding the completed documentation for the specific student you tested. In addition, we have had all of the files independently verified to make certain no deficiencies exist. Consequently, we disagree with the particular finding and we assert that we are in compliance with all rules and regulations with respect to verifications. There are no students who received an ineligible disbursement and we do not owe any repayments in regards to this particular finding.

Final Determination: CBC failed to provide the Department with the institution's verification procedures, as instructed in the Program Review Report.

In addition, the institution failed to provide an adequate response to this finding for the student's listed below:

Student #22 – The institution stated that this student received a Professional Judgment; however the school failed to provide adequate documentation supporting the Professional Judgment. The institution is required to recalculate the student's award based on the student's original EFC. The student received \$5,100.00 in Pell grant funds, \$4,500.00 in a subsidized loan and \$4,600.00 in an unsubsidized loan for the 2010-2011 award year.

Student # 23 – The institution stated that the AGI on the tax return for this student is \$36,011.00; however the tax return that was sent to us had the AGI written in due to a bad copy of the return. The institution will need to submit a better of copy of the tax return showing the AGI as originally printed. This student was awarded \$5,500.00 in Pell grant funds but only received \$2,345.00 for the 2010-2011 award year.

Finding 11: Availability of Fiscal Records

Citation: 34 C.F.R. § 668.24, *General Provisions. A school must keep fiscal records to demonstrate its proper use of FSA funds. A school's fiscal records must provide a clear audit*

trail that shows that funds were received, managed, disbursed, and returned in accordance with federal requirements.

The fiscal records that a school must maintain include, but are not limited to:

- *Records of all FSA program transactions*
- *Bank statements for all accounts containing FSA funds*
- *Records of student accounts, including each student's institutional charges, cash payments, FSA payments, cash disbursements, refunds, returns, and overpayments required for each enrollment period*
- *General ledger (control accounts) and related subsidiary ledgers that identify each FSA program transaction (FSA transactions must be separate from school's other financial transactions)*
- *Federal Work-Study payroll records*
- *FISOP portion of the FISAP*

A school has a fiduciary responsibility to segregate funds from all other funds and to ensure that federal funds are used only for the benefit of eligible students. Absent a separate bank account, the school must ensure that its accounting records clearly reflect that it segregates FSA funds. 34 C.F.R. § 668.24(d)(2)

***Noncompliance:** During the on-site program review, the institution failed to provide the reviewers with the following for the 2009-2010 and 2010-2011 award years:*

- *bank statements for all accounts containing FSA funds;*
- *General Ledgers and Subsidiary Ledgers identifying FSA transactions;*
- *records of student's account to include disbursements, refunds, returns and overpayments;*
- *FSA program reconciliation reports*

***Required Action:** In response to this report, the institution had to first provide this office with a copy of the institution's General Ledger for the FSA programs for the time period requested. In addition, the institution had to also submit original canceled checks, bank statements, deposit slips, checkbook or check register and any back-up documentation for cash transactions (including cash requests and refunds/returns of federal cash) with the Department's G5 System related to all students in the sample.*

CBC's Response: Because the audit was conducted at a time when several key staff members were unavailable, I was overwhelmed in trying to provide all of the documentation that was asked for by the audit team. The fiscal records of the school are maintained for the most part by external accountants and I was unable to retrieve this information at the time of the audit.

Enclosed for your review are the bank statements for our account for Title IV funds, the G/L related to these transactions, the records of the student accounts covered by the review and the

FSA program reconciliation reports for the award years in question. We disagree with the assertion of this particular finding and assert that we are in compliance with all rules and regulations contained in 34 C.F.R. 668.24 to the availability of fiscal records.

Final Determination: The bank statements received by the Department from CBC do not show "Federal Funds" in the account name. CBC must either notify the bank or Investment Company of the accounts that contain FSA funds and keep a copy of this notice in its records or the school must file a Uniform Commercial Code Form (UCC-1) statement with the appropriate state or municipal government entity that discloses that an account contains federal funds. If the school chooses to file a UCC-1 statement, a copy of the statement will need to be sent to the Department in response to this FPRD.

D. Summary of Liabilities

The total amount calculated as liabilities from the findings in the program review determination is as follows. The liability amount in the first chart below reflects unduplicated liabilities. This information is provided so that the institution understands the liabilities associated with each finding. The payment instructions in Section E have been adjusted to reflect the unduplicated liabilities.

Liabilities	Pell 2010-2011	DL / FFEL	EALF DL	EALF FFEL	
Finding #7	\$5,300	\$3,500			
Finding #8	\$7,445	\$9,100			
Subtotal 1	\$12,745	\$12,600	\$ 327.00	-	
Interest/SA	\$229.00	-			
Excess Cash		-			
ACA					
Subtotal 2	\$229.00	-			
TOTAL (add subtotal 1 + 2)	\$12,974	0	\$ 327.00	-	
Payable To:					Totals
Department	\$12,974.00	-	\$327.00	-	\$13,301.00
Students	-	-			\$ -
Lenders		-			\$ -
Inst Accounts	-				\$ -
COD Adjustments	Pell - Current Year				
Current Year (funds returned via G5)	-				

Estimated Actual Loss (EAL):

In lieu of requiring the institution to assume the risk of default by purchasing the ineligible loan from the holder, the Department has asserted a liability not for the loan amount, but rather for the estimated actual or potential loss that the government may incur with respect to the ineligible loan or loan amount. The estimated actual loss to the Department that has resulted or will result from those ineligible loans is based on CBC's most recent cohort default rate available.

The total amount of Direct Loan that CBC improperly disbursed during the 2009-2010 and 2010-2011 award years for findings 7 and 8 are \$12,600.00. The estimated actual loss that CBC must pay to the Department for the ineligible loans is \$327.00. A copy of the results of that calculation is included as Appendix C.

E. Payment Instructions

1. Liabilities Owed to the Department

Liabilities Owed to the Department \$1,000 or More but Less Than \$100,000

CBC owes to the Department \$13,301.00. 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: \$13,301.00
DUNS: 024458150
TIN: 581414017

Program Review Control Number: 201130427693

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. CBC is also responsible for repaying any interest that accrues. If you have any questions regarding interest accruals or payment credits, contacts the Department's Accounts Receivable Group at (202) 245-8080 and ask to speak to CBC'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, CBC 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 CBC from the Federal Government. **CBC may object to the collection by offset only by challenging the existence or amount of the debt.** To challenge the debt, CBC must **timely appeal** this determination under the procedures described in the "Appeal Procedures" section of the cover letter. The Department will use those procedures to consider any objection to offset. **No separate appeal opportunity will be provided.** If a timely appeal is filed, the Department will defer offset until completion of the appeal, unless the Department determines that offset is necessary as provided at 34 C.F.R. § 30.28. This debt may also be referred to the Department of the Treasury for further action as authorized by the Debt Collection Improvement Act of 1996.

Direct Loan Estimated Actual Loss

Findings: #7 and #8

DL Estimated Actual Loss	
Amount	Award Year
\$327.00	2010-2011
Total	
\$327.00	

CBC must pay the amount reflected above in Direct Loan estimated loss liabilities for the award year(s) reflected above. The liabilities will be applied to the general Direct Loan fund. This amount is also reflected in the total amount owed to the Department in Section 1 above.

4. Liabilities Owed to the Department in the case of Title IV Grants

Pell – Closed Award Year

Findings: #7 and #8

CBC must repay:

Pell ACG SMART or TEACH Closed Award Year			
Amount (Principal)	Amount (Interest)	Title IV Grant	Award Year
\$5,300.00	\$109.79	Pell	2009-2010
\$5,100.00	\$80.63	Pell	2010-2011
\$2,345.00	\$38.87	Pell	2010-2011
Total Principal	Total Interest		
\$12,745.00	\$229.00		

The disbursement record for each student identified in this report to the applicable findings must be adjusted in the Common Origination and Disbursement (COD) system based on the recalculated amount identified above.

Adjustments in COD must be completed prior to remitting payment to the Department. Payment cannot be accepted via G5. Once the Department receives payment via check, the Department will apply the principal payment to the applicable G5 award. The interest will be applied to the general program account.

Cobb Beauty College
OPE ID 03090600
PRCN 201130427693

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

Final Program Review Determination
PRCN #: 201130427693

Appendix A
Program Review Report



FYI

April 12, 2012

Gail Little
Cobb Beauty College
3096 Cherokee Street
Kennesaw, GA 30144-2828

UPS #
1ZA5467Y0194897083

RE: Program Review Report
OPE ID: 03090600
PRCN: 201130427693

Dear Ms. Little:

From June 27, 2011 through July 1, 2011, Sherry Blackman and Keith Brown conducted a review of Cobb Beauty College's (CBC's) administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). The findings of that review are presented in the enclosed report.

Findings of noncompliance are referenced to the applicable statutes and regulations and specify the action required to comply with the statute and regulations. Please review the report and respond to each finding, indicating the corrective actions taken by CBC. The response should include a brief, written narrative for each finding that clearly states CBC's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, CBC must provide supporting documentation as required in each finding.

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

- (1) provide to the institution an adequate opportunity to review and respond to any preliminary program review report¹ and relevant materials related to the report before any final program review report is issued;
- (2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination –
 - a. A written statement addressing the institution's response;
 - b. A written statement of the basis for such report or determination; and
 - c. A copy of the institution's response.

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

Federal Student Aid, School Participation Team - Atlanta
61 Forsyth St. Suite 18T40, Atlanta, GA 30303
www.FederalStudentAid.ed.gov

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The Department considers the institution's response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution's written response will not be attached to the FPRD. However, it will be retained and available for inspection by CBC upon request. Copies of the program review report, the institution's response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after the FPRD is issued.

The institution's response should be sent directly to Sherry Blackman of this office within 60 calendar days of receipt of this letter.

Protection of Personally Identifiable Information (PII):

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

Record Retention:

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

We would like to express our appreciation for the courtesy and cooperation extended during the review. Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact Sherry Blackman at 404-974-9287 or Sherry.Blackman@ed.gov.

Sincerely,

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

Chris Miller
Team Leader

cc: Angela Slater, Financial Aid Administrator

Enclosure:

Protection of Personally Identifiable Information

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

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

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

Hard copy files and media containing PII must be:

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

PII data cannot be sent via fax.

Prepared for

Cobb Beauty College



START HERE: 
GO FURTHER: 
FEDERAL STUDENT AID

OPE ID 03090600

PRCN 201130427693

Prepared by

U.S. Department of Education

Federal Student Aid

School Participation Team – Atlanta

Program Review Report

April 12, 2012

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A. Institutional Information

Cobb Beauty College
3096 Cherokee Street
Kennesaw, GA 30144

Type: Proprietary

Highest Level of Offering: Certificate

Accrediting Agency: Council on Occupational Education

Current Student Enrollment: 46 (2011-2012)

% of Students Receiving Title IV: 85% (2011-2012)

Title IV Participation PEPS:

	2010-2011
Pell Grant	\$ 186,138.00
William D. Ford Federal Direct Loan Program	\$ 305,194.00

Default Rate FFEL/DL:	2009 3.1%
	2008 2.1%
	2007 3.1%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Cobb Beauty College (CBC) from June 27, 2011 to July 1, 2011. The review was conducted by Sherry Blackman and Keith Brown.

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

A sample of 30 files was identified for review from the 2009-2010 and 2010-2011 (year to date) award year. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. 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. CBC'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 CBC 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 CBC to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding 1: Inadequate and Missing Attendance Records

Citation: 34 C.F.R. § 668.24, General Provisions. An institution shall maintain required records in a systematically organized manner. An institution may keep required records in hard copy or in microform, computer file, optical disk, CD-ROM, or other media

or may be provided that all record information must be retrievable in a coherent hard copy format or in other media formats acceptable to the Secretary.

An institution may disburse Title IV, HEA program funds to a student or parent for payment period only if the student is enrolled for classes for that payment period and is eligible to receive those funds. 34 C.F.R. § 668.164(b)(3), General Provisions.

For each payment period, an institution may pay a Federal Pell Grant to an eligible student only after it determines that the student qualifies as an eligible student under 34 C.F.R. Part 668, Subpart C, is enrolled in an eligible program as an undergraduate student, and if enrolled in a credit hour program without terms or a clock hour program, has completed the payment period as defined in § 668.4 for which he or she has been paid a Federal Pell Grant. 34 C.F.R. § 690.75(a), Federal Pell Grant Program

Noncompliance: The review of the 30 student files listed in Appendix A disclosed that attendance records were missing from the student's files. The institution did not have a reliable automated system for clocking students in and out, nor is there a computer program that documents cumulative hours attended. Instead, instructors enter hours attended in the school's computer system on a weekly basis. The financial aid director must manually add up the hours of attendance by week for each student, and then add up all the weekly totals to get an overall total. This process is extremely time consuming and inefficient, as well as subject to human error.

Without attendance records for the 30 students listed in Appendix A, it was impossible for the Department to determine the following:

- How many clock hours a student earned on a daily basis;
- How many cumulative clock hours were earned during a payment period;
- When a student was eligible for his or her next Title IV disbursement;
- If a student is making satisfactory academic progress (SAP);
- A student's start date into the institution/program of study;
- When a student drops out without notifying school officials;
- If a student should be terminated due to poor attendance.

Required Action: Clock hour schools must take daily attendance to measure the academic progress in clock hours. Attendance has a direct affect on when students are eligible for their Title IV disbursements. Also, the attendance records must present a clear audit trail to show that students are eligible for their Title IV disbursements.

Therefore, CBC must strengthen its procedures to ensure that attendance records are accurate to prevent improper disbursements of Title IV funds. In addition, the institution must determine what system it will use to monitor and track attendance adequately. Furthermore, the institution will be required to reconstruct the attendance records for all

Title IV recipients in the 2009-2010 and 2010-2011 award years to present. The reviewer should be able to track the clock hours and identify how many clock hours were earned in each payment period. Please provide a copy of the reconstructed attendance records for all of the students listed in Appendix A.

Also, the institution must provide the following documentation in an electronic spreadsheet format, which will help verify that the students in the award years under review were in attendance and eligible for the Federal Pell Grant funds and Direct Loans that were disbursed:

- student name,
- social security number,
- start date,
- withdrawal date,
- LDA, re-entry, graduation dates (if applicable),
- clock hours earned in each payment period with payment dates,
- the amount, and date the student received the Title IV disbursements, and
- the amount that was under/over paid

CBC must engage an Independent Public Accountant (IPA) to test the file review completed by CBC. The IPA must develop a set of procedures designed for testing the accuracy and completeness of the file review. The suggested procedures must be provided to Sherry Blackman within 30 days of the institution's receipt of this Program Review Report. Sherry Blackman will review the procedures, indicate if any changes are needed, and approve the procedures.

The IPA must apply the agreed upon procedures to test the file review(s) completed by CBC, and prepare a report including any exceptions noted during its testing. The exceptions must be detailed and identified. Exceptions must be reported for all file review elements as specified in the finding requirement as presented in the Program Review Report. The IPA must prepare the report in accordance with the AICPA Attestations Standards. The IPA's report must be submitted with CBC's response to this Program Review Report

Finding 2: Lack of Administrative Capability

Citation: 34 C.F.R § 668.16. To manage a school's aid programs effectively, the aid administrator must be supported by an adequate number of professional and clerical personnel. The number of staff that is adequate depends on the number of students aided, the number and types of programs in which the school participates, the number of applicants evaluated and processed, the amount of funds administered, and the type of financial aid delivery system the school uses. What may be adequate at one school may be insufficient at another. The Department will determine, on a case-by-case basis, whether a school has an adequate number of qualified persons, based on program

reviews, audits, and information provided on the school's application for approval to participate in the FSA programs.

In addition to having a well-organized financial aid office staffed by qualified personnel, a school must ensure that its administrative procedures for the FSA programs include an adequate system of internal checks and balances. This system, at a minimum, must separate the functions of authorizing payment and disbursing or delivering funds so that no one person or office exercises both functions for any student receiving FSA funds.

Noncompliance: The Department found that the institution's financial aid office was inadequately staffed. Only one person, Ms. Angela Slater, staffed the financial aid office. Ms. Slater was also disbursing Title IV aid; therefore, there was no separation of duties.

Required Action: To continue participation in any Title IV, HEA program, an institution must demonstrate that it is capable of adequately administering that program under standards established by the Secretary. The Secretary considers an institution to have that administrative capability if it establishes and maintains student financial records required under Section 668.23 and the individual Title IV, HEA program regulations, and if it performs other functions, including the following:

Personnel:

- * Designates a capable individual to be responsible for administering all the Title IV programs in which it participates, and coordinates the programs with the institution's other Federal and non-Federal programs of student financial assistance.

- * Uses an adequate number of qualified persons to administer the Title IV programs

Internal Controls:

- * Administers Title IV programs with adequate checks and balances in its system of internal controls, and divides the functions of authorizing payments and disbursing or delivering funds so that no office has responsibility for both functions.

In response to this finding, the institution must develop internal policies and procedures outlining how the institution will staff the financial aid office with qualified personnel and ensure that its administrative procedures for the FSA programs include an adequate system of internal checks and balances. This includes separating the functions of authorizing payment and disbursing funds. A copy of these procedures must be submitted to this office.

Finding 3: Missing Entrance/Exit Counseling for Direct Loans

Citation: 34 C.F.R. § 685.304 (a), Direct Loan Program The institution must conduct entrance counseling with each Direct Loan borrower either in-person, by audiovisual presentation, or by computer assisted technology. In each case, the institution must conduct this counseling prior to the release of the first loan proceeds.

Noncompliance: The records for student #17, 18, 19, 21, 23, 24, 25, 26, 27, and 29 contained no documentation to support that the borrower was provided entrance counseling. Files for students' #1 – 30 did not contain documentation to support that exit counseling was provided. These students received a Direct Loan (Subsidized and Unsubsidized) in the 2009-2010 and 2010-2011 award year.

Required Action: The entrance and exit counseling must be in person, by audiovisual presentation, or by interactive electronic means. In each case, the school must ensure that an individual with expertise in the Title IV programs is reasonable available shortly after the counseling to answer the student borrower's questions.

In response to this finding, the institution must provide assurance entrance counseling interviews will be conducted with each borrower in accordance with the regulatory requirements, and the borrowers' records contain adequate documentation to support appropriate counseling was provided. Also, the institution must institute procedures to ensure all Title IV borrowers receive entrance counseling. A copy of the procedures must be submitted with the institution's response to this finding.

Finding 4: Missing and Inadequate Award Notification Letters

Citations: 34 C.F.R. § 668.165(a)(1), General Provisions. 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.

Noncompliance: The institution failed to provide the following students with an award notification letter notifying the students of the amount of Title IV funds they should expect to receive and when those funds would be disbursed: Students #17 and 27.

Required Action: In response to this finding, the institution must develop a policy with procedures to ensure that each student is counseled and notified of the amount of Title IV aid he or she can expect to receive, and how and when that amount will be paid. A copy of this policy must be submitted to this office. Also, the institution must include a copy of the institution's new award/notification letter.

Finding 5: Missing High School Diploma, GED, or ATB – Ineligible Students

Citation: 34 C.F.R. § 668.32, General Provisions. To receive FSA funds, a student must be qualified to study at the postsecondary level. A student qualifies if she has a high school diploma, the recognized equivalent of a high school diploma, typically a general education development or GED certificate, completed home schooling, or passed a Department approved ability-to-benefit test.

Noncompliance: The institution's admission policy requires all applicants for enrollment to be beyond the age of compulsory school attendance and have a High School Diploma, GED, or Ability-to-Benefit (ATB). The reviewers noted students #9 did not have a high school diploma, GED, or ATB documentation or a signed statement from the student in its academic or financial aid file folder.

Required Action: As previously stated, it is also a part of the school's admissions policy that an applicant has a High School Diploma, or its equivalent, a GED, or ATB to be enrolled as a regular student and receive FSA funds.

In response to this finding, the institution must provide assurances that, in the future, students will not be enrolled and receive Title IV funds unless they have a valid High School Diploma, or its equivalent, a GED, completed home schooling, or pass a Department approved ATB test.

Also, all Title IV funds disbursed to students #9 will be a liability, unless the institution can provide documentation that the student does have a valid High School Diploma, or its equivalent, a GED, completed home schooling, or passed a Department approved ATB test.

If applicable, instructions regarding repayment of ineligible disbursements will be provided in the Final Program Review Determination letter.

Finding 6: Overaward – Financial Need Exceeded

Citation: 34 C.F.R. § 668.35(e), & (g), General Provisions. An overaward exists when a student's aid package exceeds his or her need. While your school must always take care not to overaward a student when packaging his or her aid, circumstances may change after you have packaged the student's aid that result in an overaward. (Please see Volume 3 for a discussion of avoiding overawards during the packaging process.) For instance, the student may receive a scholarship or grant from an outside organization. When an overaward situation arises, you may be required to adjust the Federal Student Aid (FSA) in the student's package in order to eliminate the overaward.

An overaward exists whenever:

- A school awards aid either to a student who is ineligible for a specific program or to a student who is ineligible for any FSA program assistance;
- A student's award in an individual program exceeds the regulatory maximum, e.g., the annual or aggregate loan limits, the annual limit on Federal Supplementary Educational Opportunity Grant (FSEOG) awards or a Pell award based on the wrong payment schedule/enrollment status;
- A student's aid package exceeds his or her need (including when the student's Expected Family Contribution (EFC) is revised upward after initial packaging);
- A student's award exceeds his or her Cost of Attendance; and
- A student is receiving a Pell, or Iraq and Afghanistan Service Grant at multiple schools for the same period.

In general, unless a school is liable, a student is liable for any overpayment made to him or her.

Noncompliance: Student # 6 had a total budget of \$9,750 and an EFC of 0, leaving the student with a need of \$9,750. The school awarded the student \$4,012 in Pell, \$4,251 in a subsidized loan and \$3,000 in an unsubsidized loan. The total aid for this student was \$11,263. The \$9,750 budget minus the \$11,263 created an overaward of \$1,513.

Student # 8 had a total budget of \$11,750 and an EFC of \$14,640 leaving the difference of -\$2,890. The student was clearly ineligible for need based aid but was awarded a subsidized loan in the amount of \$3,500. The student also received an unsubsidized loan in the amount of \$4,000 making his total \$7,500 in federal aid. The student was ineligible for the subsidized loan for \$3,500, due to the fact that the subsidized loan is based on need.

Required Action: The institution will be liable for the amount equal to the overpayment and any administrative cost allowance claimed on that amount to the applicable Title IV fund.

In response to this finding, the institution must provide assurances that, in the future the institution will only award and disburse Title IV funds to a student if those funds, combined with the other resources the student receives, are not in excess of the student's financial need.

If applicable, instructions regarding repayment of ineligible disbursements will be provided in the Final Program Review Determination letter.

Finding 7: Failure to Document Professional Judgment

Citation: HEA Sec. 479A(a) IN GENERAL. An aid administrator may use professional judgment (PJ) on a case-by-case basis only, to alter the data used to calculate the EFC. Professional judgment is valid only at the school making it. The institution must submit a PJ change electronically, via FAA Access to CPS Online or third-party software, and may do it without a signature from the student or parent. In FAA Access, the institution must select "EFC adjustment requested" for the professional judgment field. The next ISIR will indicate "Professional judgment processed."

The reason for the adjustment must be documented in the student's file, and it must relate to the special circumstances that differentiate him—not to conditions that exist for a whole class of students. The institution can also use professional judgment to adjust the student's cost of attendance. The institution must resolve any inconsistent or conflicting information shown on the output document *before* making any adjustments. An aid administrator's decision regarding adjustments is final and cannot be appealed to the Department. 2010-2011 Application and Verification Guide, Chapter 5, p. 104.

Noncompliance: The institution failed to adequately document why professional judgment was conducted for the following student:

Student #2: According to a Professional Judgment (PJ) Form in the student's file, a loss of income occurred for the parent. This student was selected for verification for the 2009-2010 award year.

There was no supporting documentation (divorce decree, unemployment letter, written statement from the student, W-2 form, etc.) in the student's file to support the circumstances for PJ. CBC's PJ form states that supporting documentation is required for all circumstances. Student #2 received \$5,300 in Federal Pell Grant funds.

Required Action: The institution must revise its policy on performing future professional judgments to correspond to regulations and submit evidence of the revision to this office. Also, the institution is required to resolve any conflicting information and provide the adequate supporting documentation to this office for student #2 to support the circumstances that caused the institution to perform PJ.

If applicable, instructions regarding repayment of ineligible disbursements will be provided in the Final Program Review Determination letter.

Finding 8: Incomplete Verification

Citations: (34 C.F.R. §§ 668.16 [f], 668.51 through 668.61, and the U.S. Department of Education's Application and Verification Guide.) The purpose of verification is to ensure that Title IV funds are awarded to student applicants in the correct amount.

Students are selected for verification on the basis of application edits specified by the Secretary. An institution must establish procedures to request, receive, and verify applicant data for each award year. Institutions are also responsible for resolving conflicting information related to a student's application for federal student aid. There are five required data elements that must be verified. These five items are:

- Household size (HHS);
- Number enrolled in college;
- Adjusted Gross Income (AGI);
- U.S. income tax paid; and,
- Other untaxed income and benefits.

Supporting documentation collected from the student (and parents or spouse) is compared to the information reported on the student's Institutional Student Information Record (ISIR). Verification documentation collected must be retained in the student's file as evidence that the process was completed.

Noncompliance: The institution failed to accurately verify and complete verification for the following students who were selected for verification: Also below are instances of conflicting information in the student's file, which appear to be unresolved.

Student #18: The 2010-2011 Dependent Verification Worksheet is incomplete. The student failed to sign the form. Also, the parent's 2009 Income Tax Return was not in the financial aid file. Therefore, the reviewers could not verify if verification had been completed. Student #18 received \$2,625 in Federal Pell Grant funds.

Student #22: The 2010-2011 ISIR revealed that the student's AGI was \$37,274 but the 2009 tax return revealed that the AGI was \$55,551. Verification was not performed on this student. The student received \$5,100 in Pell.

Student #23: The 2010-2011 ISIR revealed that the student's AGI was \$36,011 but the 2009 tax return revealed that the AGI was \$13,369. Verification was not performed on this student. The student received \$2,345 in Pell.

Student #24: The student's 2009 tax return is not signed by the student or spouse. Verification is considered incomplete. The student received \$5,550 in Pell and \$3,500 in a subsidized loan.

Required Action: The institution must resolve the verification deficiencies and demonstrate that verification has been properly completed for the students referenced above. If any student's EFC, scheduled award and expected disbursements changes as a result of verification, the institution is liable for the difference between the correct disbursement and the actual disbursement. Also, for each case where the institution cannot complete the verification process, the institution is liable for the actual disbursement.

The institution must also develop and submit with its response, procedures which will ensure that all students selected for verification will be verified accurately and in accordance with Title IV policies.

Additionally, due to the high percentage of errors discovered during the 2010-2011 award year CBC must review the file of every student selected for verification during that year to determine if the process was properly completed for all selected students.

If applicant information varies from data reported on the student's ISIR, the EFC must be recalculated for that student. If the revised EFC results in a change to the amount of Federal Pell Grant, and/or Subsidized Loan disbursed to the student, you must report the difference between the correct and incorrect amount for each program.

In instances for which a student's EFC has changed, please provide a listing of the following:

- Student name and social security number
- Original EFC and corrected EFC
- Amount of aid disbursed to the student by Title IV program (e.g., FFEL sub)
- Correct amount of aid student was eligible for by Title IV program
- Difference between correct versus actual amounts of aid by Title IV program.

If you do not have a student's required verification documentation, you must report the amount of Federal Pell Grant, and/or subsidized/unsubsidized loan disbursed to the student in a separate spreadsheet that is similar to that above.

CBC must engage an Independent Public Accountant (IPA) to test the file review completed by CBC. The IPA must develop a set of procedures designed for testing the accuracy and completeness of the file review. The suggested procedures must be provided to Sherry Blackman within 30 days of the institution's receipt of this Program Review Report. Sherry Blackman will review the procedures, indicate if any changes are needed, and approve the procedures.

The IPA must apply the agreed upon procedures to test the file review(s) completed by CBC, and prepare a report including any exceptions noted during its testing. The exceptions must be detailed and identified. Exceptions must be reported for all file review elements as specified in the finding requirement as presented in the Program Review Report. The IPA must prepare the report in accordance with the AICPA Attestations Standards. The IPA's report must be submitted with CBC's response to this Program Review Report

Instructions regarding repayment of ineligible disbursements will be provided in the Final Program Review Determination letter, as appropriate.

Finding 9: Incorrect Return of Title IV (R2T4) Calculations

Citations: 34 C.F.R. § 668.22(a) and (e), General Provisions. When a recipient of Title IV grant or loan assistance withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, the institution must determine the amount of Title IV grant or loan assistance that the student earned as of the student's withdrawal date in accordance with paragraph (e) of

The amount of Title IV grant or loan assistance that is earned by the student is calculated by determining the percentage of Title IV grant or loan assistance that has been earned by the student. Applying this percentage to the total amount of Title IV grant or loan assistance that was disbursed (and that could have been disbursed) to the student, or on the student's behalf, for the payment period or period of enrollment as of the student's withdrawal date.

Noncompliance: The institution failed to perform and/or document refund calculations for the following students:

Student # 12: The student's start date was 10/6/2009 and the withdrawal date was 7/14/2010. The student earned 394 clock hours out of the 1106 clock hours of the 1500 hours required to graduate from the Cosmetology program. A refund calculation was not performed.

Student # 25: The student's start date was 12/8/2010 and the withdrawal date was 3/20/2011. The student earned 191 clock hours out of the 1500 clock hours required to graduate from the Cosmetology program. A refund calculation was not performed.

Student #30: The student's start date was 9/1/2009 and the withdrawal date was 9/15/2010. The student earned 1355 out of the 1500 required to graduate from the Cosmetology program. A refund calculation was not performed.

Required Action: In its response, the institution must provide this office a list of all students, in the 2009/2010 and 2010-2011 award years, who ceased to be enrolled during a given enrollment period. Along with this list the institution must provide a copy of each refund calculation performed and evidence that the refunds were returned to the proper Title IV program/student.

Please include this information in the following format:

- Student Name:
- Social Security Number:
- Start Date:
- Withdrawal Date:
- Program of Study:
- Hours Scheduled to Complete in Payment Period or Period of Enrollment:
- Total Hours in Payment Period or Period of Enrollment:
- Original Amount/Title IV Program of the R2T4 Funds Calculated By School and Award Year:
- Date Paid, and to Whom:
- Recalculated Amount/Title IV Program of the R2T4 Funds By School and Award Year:
- Amount Due to Dept. of Ed. (DOE) or Lender (Specify which entity):

The institution must provide this office with canceled checks (front and back) for any Title IV funds that were returned to the Federal Pell account, lender, or the U.S. Department of Education prior to this program review report. *The institution must also provide a copy of each student's original and recalculated return of Title IV funds calculation worksheet.* A copy of CBC's revised policies and procedures for R2T4 should also be included with its response to this report.

Please submit the results of your review electronically. Return the file to Sherry Blackman at Sherry.Blackman@ed.gov. The Institution must submit the data file in a .zip file encrypted with AES encryption (256-bit is preferred). One way to create such a file is with WinZip 11.0, available at www.winzip.com <<http://www.winzip.com>>. The Department uses WinZip and we have enclosed instructions for creating encrypted files with this software. Files created with other software are also acceptable, provided that they are compatible with WinZip and encrypted with AES encryption, however, the Department cannot provide support for alternate software.

CBC must engage an Independent Public Accountant (IPA) to test the file review completed by CBC. The IPA must develop a set of procedures designed for testing the accuracy and completeness of the file review. The suggested procedures must be provided to Sherry Blackman within 30 days of the institution's receipt of this Program

Review Report. Sherry Blackman will review the procedures, indicate if any changes are needed, and approve the procedures.

The IPA must apply the agreed upon procedures to test the file review(s) completed by CBC, and prepare a report including any exceptions noted during its testing. The exceptions must be detailed and identified. Exceptions must be reported for all file review elements as specified in the finding requirement as presented in the Program Review Report. The IPA must prepare the report in accordance with the AICPA Attestations Standards. The IPA's report must be submitted with CBC's response to this Program Review Report

If applicable, the institution will be liable for all additional refunds, which are due. Payment instructions will be provided in the Final Program Review Determination letter.

Finding 10: Improper Pell Disbursement Prior to Subsequent Payment Period

Citation: 34 C.F.R. § 690.62, General Provisions. Before you awarded funds to a student, you confirmed that he or she was an eligible student and was making satisfactory academic progress (See *Volume 1, Student Eligibility*). However, before disbursing FSA funds, you must determine and document that a student remains eligible to receive them. That is, you must confirm that:

- The student is enrolled for classes for the period;
- A student enrolled in a non-term program has completed the previous period (credits and weeks or clock hours and weeks of instruction);
- If the disbursement occurs on or after the first day of classes, that the student has begun attendance;
- For DL loans, the student is enrolled at least half time;
- First-time FSA borrowers have completed entrance counseling and/or received the required disclosures;

Noncompliance: Student # 17 did not reach the midpoint of the program/academic year. In a non-term program, if a student's progress is measured in clock hours, a student may not be paid for a subsequent payment period until the student finishes the hours of the payment period for which the student has already been paid.

The institution disbursed the second Federal Pell Grant disbursement in the amount of \$2,100 to student # 17 before the student reached 451 clock hours in a 1500 clock hour Cosmetology program.

Required Action: The institution must develop and submit with its response written internal procedures to ensure that second or subsequent Federal Pell Grant disbursements are not made prior to the midpoint in terms of clock hours.

If applicable, instructions regarding repayment of ineligible disbursements will be provided in the final Program Review Determination letter.

Finding 11: Availability of Fiscal Records

34 C.F.R. § 668.24, General Provisions. A school must keep fiscal records to demonstrate its proper use of FSA funds. A school's fiscal records must provide a clear audit trail that shows that funds were received, managed, disbursed, and returned in accordance with federal requirements.

The fiscal records that a school must maintain include, but are not limited to:

- Records of all FSA program transactions
- Bank statements for all accounts containing FSA funds
- Records of student accounts, including each student's institutional charges, cash payments, FSA payments, cash disbursements, refunds, returns, and overpayments required for each enrollment period
- General ledger (control accounts) and related subsidiary ledgers that identify each FSA program transaction (FSA transactions must be separate from school's other financial transactions)
- Federal Work-Study payroll records
- FISOP portion of the FISAP

A school has a fiduciary responsibility to segregate funds from all other funds and to ensure that federal funds are used only for the benefit of eligible students. Absent a separate bank account, the school must ensure that its accounting records clearly reflect and segregates FSA funds. 34 C.F.R. § 668.24(d)(2)

Noncompliance: During the on-site program review, the institution failed to provide the reviewers with the following for the 2009-2010 and 2010-2011 award years:

- bank statements for all accounts containing FSA funds;
- General Ledgers and Subsidiary Ledgers identifying FSA transactions;
- records of student's account to include disbursements, refunds, returns and overpayments;
- FSA program reconciliation reports

Required Action: In response to this report, the institution must first provide this office with a copy of the institution's General Ledger for the FSA programs for the time period requested. In addition, the institution must also submit original canceled checks, bank statements, deposit slips, checkbook or check register and any back-up documentation for

cash transactions (including cash requests and refunds/returns of federal cash) with the Department's G5 System related to all students in the sample.

Once the Department receives the institution's response to this finding, further guidance will be provided to the institution. If applicable, instructions regarding repayment of ineligible disbursements will be provided in the Final Program Review Determination letter.

Appendix A

Student Sample
2009-2010

#	SSN	Last Name	First Name
1.	(b)(6); (b)(7)(C), (b)(7)(C)		
2.			
3.			
4.			
5.			
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11.			
12.			
13.			
14.			
15.			

Student Sample
2010-2011

17.	(b)(6); (b)(7)(C), (b)(7)(C)
18.	
19.	
20.	
21.	
22.	
23.	
24.	
25.	
26.	
27.	
28.	
29.	
30.	

Final Program Review Determination
PRCN #: 201130427693

Appendix B

CBC's Response
to the Program Review Report

Prepared for

**U.S. Department of Education
Federal Student Aid
School Participation Team – Atlanta**

**OPE ID 03090600
PRCN 201130427693**

Prepared by

Cobb Beauty College

**Response to
Preliminary Program Review Report
July 12, 2012**

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Subject: Cobb Beauty College
From: Bill King (bbkingfsu@yahoo.com)
To: Sherry.Blackman@ed.gov;
Date: Tuesday, May 29, 2012 2:56 PM

Hello Sherry,

My name is Bill King and I am working with Gail Little from Cobb Beauty College to complete the response of the program review letter you issued her on April 12, 2012. I tried contacting you last week by phone but I have not heard back from you yet. I was able to finally track down your e-mail address so that I could send you the procedures from the Independent Public Accountant for your review and approval. They are attached.

As soon as you approve their procedures, I will schedule the field work for them to come and do the testing. I would request that we could extend the initial due date of June 12, 2012 for the response. I will need time to coordinate the efforts of the IPA and have time for them to issue their report. Would it be possible to extend the due date to August 12 so that I can be certain to have everything together for your review? Please let me know as soon as possible.

Sincerely,

William King
Consultant

Subject: RE: Cobb Beauty College
From: Blackman, Sherry (Sherry.Blackman@ed.gov)
To: bbkingfsu@yahoo.com;
Cc: Christopher.Miller@ed.gov;
Date: Monday, July 2, 2012 8:04 AM

Yes.

Sherry F. Blackman

Institutional Review Specialist

U.S. Department of Education

61 Forsyth St., SW, Suite 18T35B

Atlanta, GA

Office (404) 974-9287

Fax (404) 974-9322

From: Bill King [mailto:bbkingfsu@yahoo.com]
Sent: Saturday, June 30, 2012 6:13 PM
To: Blackman, Sherry
Subject: Re: Cobb Beauty College

In order to comply, the auditor will be testing every file for every student for both award years. Will that be sufficient?

Bill

From: "Blackman, Sherry" <Sherry.Blackman@ed.gov>

To: Bill King <bbkingfsu@yahoo.com>

Cc: "Christopher Miller" <Christopher.Miller@ed.gov>; J. Allen Seymour <allen@athensga.edu>

Sent: Thursday, June 21, 2012 11:45 AM

Subject: RE: Cobb Beauty College

Mr. King:

The testing plan as presented in the attached document is not sufficient. The auditor promises to take a random sample of 25% of the students. The Department requires a 95% confidence level for the audit. Please revise the agreed upon procedures and resubmit for approval.

Please contact me if you have any questions.

Thank you.

Sherry Blackman
404-974-9287

From: Bill King [bbkingfsu@yahoo.com]

Sent: Thursday, June 21, 2012 7:15 AM

To: Blackman, Sherry

Cc: Christopher.Miller@ed.gov; J. Allen Seymour

Subject: Re: Cobb Beauty College

Good Morning,

We are still awaiting approval on the procedures for the Independent Public Accountant. We have scheduled him to come next week but will have to delay that unless we receive the approval. This will further delay our response. Please advise.

Thanks,
Bill King

From: "Blackman, Sherry" <Sherry.Blackman@ed.gov>

To: Bill King <bbkingfsu@yahoo.com>

Sent: Tuesday, June 5, 2012 9:15 AM

Subject: RE: Cobb Beauty College

Our manager is reviewing the procedures at this time. Once he's completed the review, I will contact you. Thank you.

From: Bill King [<mailto:bbkingfsu@yahoo.com>]

Sent: Monday, June 04, 2012 4:06 PM

To: Blackman, Sherry

Subject: Re: Cobb Beauty College

Thank you for your reply. We appreciate the extension of time. Were the testing procedures that were submitted to you acceptable?

Thanks,
Bill

From: "Blackman, Sherry" <Sherry.Blackman@ed.gov>
To: Bill King <bbkingfsu@yahoo.com>
Cc: "Miller, Christopher" <Christopher.Miller@ed.gov>
Sent: Monday, June 4, 2012 2:38 PM
Subject: RE: Cobb Beauty College

Mr. King,

Your request for an extension has been approved for an additional 30 days. Cobb Beauty School's response is now due on July 12, 2012. If the school cannot submitted its response at that time, the school can request another extension. The Department will reexamine the circumstances and decided if another extension should be granted.

If you have further questions, please do not hesitate to contact me via email or the number below.

Thank you,

Sherry F. Blackman

Institutional Review Specialist
U.S. Department of Education
61 Forsyth St., SW, Suite 18T35B
Atlanta, GA
Office (404) 974-9287
Fax (404) 974-9322

From: Bill King [<mailto:bbkingfsu@yahoo.com>]
Sent: Monday, June 04, 2012 8:45 AM
To: Blackman, Sherry
Subject: Cobb Beauty College

Good Morning,

We are still waiting for approval of the procedures for the testing that needs to be done by the Independent Public Accountant required in your review letter dated April 12, 2012. As this testing will require time for the IPA to come onsite and then complete a report, we are also asking for an additional 60 days to submit out final response. Please acknowledge receipt of this communication and advise us of your response so that we can comply with the program review.

Sincerely,

Subject: RE: Cobb Beauty College
From: Blackman, Sherry (Sherry.Blackman@ed.gov)
To: bbkingfsu@yahoo.com;
Cc: christoper.miller@ed.gov;
Date: Thursday, July 12, 2012 10:05 AM

Mr. King:

I've approved your request for an extension to submit your response to the Program Review Report. Please submit the school's response to the PRR no later than July 20, 2012.

If you have any questions, please feel free to contact me at the number below or via email.

Thank you,

Sherry F. Blackman

Institutional Review Specialist

U.S. Department of Education

61 Forsyth St., SW, Suite 18T35B

Atlanta, GA

Office (404) 974-9287

Fax (404) 974-9322

From: Bill King [mailto:bbkingfsu@yahoo.com]

May 21, 2012

Bill King
Cobb Beauty College
Via Email: bbkingfsu@yahoo.com

Dear Bill:

Attached is my tentative list of procedures that we will perform.

Let me know if you think these procedures will be sufficient. Once we have agreed on the procedures to be performed, I will present them in the form of an engagement letter for an "agreed-upon procedures" report in accordance with AICPA Attestations Standards.

We will also need a copy of your response as soon as possible to make sure our report covers the relevant portions.

Finding # 1: Attendance Records:

1. Test for Completeness of the Institution's file review:

Using a random selection method, select from the DOE Pell Register and Loan Disbursements Register a sample consisting of 25% of Students who received one or more disbursements from the Pell or Direct Loan Programs during the 2009-2010 and 2010-2011 award years, and:

- Examine evidence that each selected student is included in the institution's file review.

2. Test for Accuracy of the Institution's File Review:

Obtain the student files for each student selected above, and:

- Determine that the Institution has reconstructed the attendance records for the selected Title IV recipients for the 2009-2010 and 2010 and 2011 award years.
 - For each student selected, verify by examination of the student file, that the student information included in the documentation submitted in response to Finding 1 is accurate (see listing at note 1).
3. Determine that the Institution presently has in place, a reliable automated system for clocking students in and out, and that this system is currently being used to document cumulative hours attended.

We will conduct a "walk-through" of Institution's procedures for clocking students in and out using the automated system, and review

the Institution's record produced by that system, to determine that the system is providing accurate and timely documentation of student clock hours.

Finding #8: Incomplete Verification:

1. Test of the assertion that all students have been included in the Institution's File Review

Using the randomly selected students selected for Finding #1:

- Examine evidence that each selected student, as well as students #18, #22, #23 and #24 as identified in your report, are included in the Institution's review.
- 2. Test for Accuracy of the Institution's review
 - Using the randomly selected students referred to above, verify:
 - that the students selected can be verified accurately and in accordance with Title IV Policies,
 - that the selected student files and that any errors that were identified have been corrected
 - Specific Procedures will include, but will not be limited to the following:
 - Verify, for each file selected, that the file includes documentation to verify household size, Number of household members enrolled in college, adjusted gross income, US income tax paid, and other untaxed income and benefits.
 - Agree the information above, to each selected student's Institutional Student Information Record.
 - For any instance in which the documentation in the file does not support the information in the student's Institutional Student Information Record, determine that the Institution has recalculated the student's EFC.
 - If the revised EFC results in a change to the amount Federal Pell Grant, and/or Subsidized Loan disbursed to the student, verify that the institution has reported the difference between the correct and incorrect amount for each program.

Finding 9: Incorrect Return of Title IV (R2T4) Calculations:

1. Test of the assertion that all students in the 2009/2010 and 2010/2011 award years, who ceased to be enrolled during a given enrollment have been included in the Institution's list by
 - Using the randomly selected students selected for Finding #1, determine, by examination of the student files, if the student withdrew during the 2009/2010 or 2010/2011 award years. If the student withdrew, verify that the student is included in the list of all students in the 2009/2010 and 2010/2011 award years who ceased to be enrolled during a given enrollment period.
2. Test the assertion that the information included in the list provided by the Institution is accurate, by
 - Specifically verifying the information included in the list for the students in step 1, above, who were found to have ceased to be enrolled during a given enrollment.
 - If the sample above does not equal at least 10% of the students reported as withdrawn, additional students will be selected from the listing, so that the total sample size is at least 10%

We will perform the procedures, and report what we find - good or bad. It's not like a regular audit where you have a standard "boilerplate" report.

Sincerely,

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

J. Allen Seymour, CPA

July 6, 2012

Cobb Beauty College, Inc.

We have performed the procedures enumerated below, which were agreed to by Cobb Beauty College Inc. and Sherry F. Blackman, Institutional Review Specialist, U.S. Department of Education, solely to assist Cobb Beauty College with respect to correction of files, reporting to the Department of Education in response to certain findings of the Department of Education Program Review received by Cobb Beauty College, Inc. on April 12, 2012.

The management of Cobb Beauty College, Inc. is responsible for the student records. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in the report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

Program Review Finding # 1: Attendance Records:

1. Test for Completeness of Cobb Beauty College, Inc.'s mandated review (the institution's file review) of student files for the fiscal years ending June 30, 2010 and 2011.

We independently obtained a copy of the Pell Register and Loan Register, prepared by the Department of Labor, and examined 100% of the files for students who received one or more disbursements from the Pell or Student Loan Programs during the 2009-2010 and 2010-2011 award years, and:

- Examined evidence that each selected student is included in the institution's mandated file review.

Our Finding: We determined that all students included on the Pell Register and Loan Register were included in the Cobb Beauty College File review.

2. Test for Accuracy of the Institution's File Review:

We obtained a copy of the student file review (attachment A), and the student files for each student who, per the Pell Disbursement or Loan Register, received a disbursement from the Pell Grant or Federal Student Loan Program during the 2009-2010 and/or 2010-2011 award years, and by examination of the student files:

- Determined if the Institution has reconstructed the attendance records for the selected Title IV recipients for the 2009-2010 and 2010 and 2011 award years.
- Verified that the student information included in the file review prepared by Cobb Beauty College is consistent with the information we found in the student files.

Our Finding: We found that the attendance records were present, and that the student information included in the file review prepared by Cobb Beauty College is consistent with the information we found in the student files.

3. Determine that the Institution presently has in place, a reliable automated system for clocking students in and out, and that this system is currently being used to document cumulative hours attended.

We conducted a "walk-through" of Institution's procedures for clocking students in and out using the automated system, and reviewed the Institution's record produced by that system, to determine that the system is providing accurate and timely documentation of student clock hours.

Our Finding: We found that system appears to be functioning as intended.

Program Review Finding # 8 - Incomplete Verification:

1. Test of the assertion that all students have been included in the Institution's File Review

We examined evidence that each selected student, as well as students #18, #22, #23 and #24 as identified in the Department of Education Program Review report, were included in the Institution's review.

Our Finding: We found that the students above were included in the institution's review

2. Test that information in the students files can be verified accurately and in accordance with Title IV Policies, that the selected student files and that any errors that were identified have been corrected

We examined each student file for students who received a Pell Grant or Federal Student Loan during the program years 2009-2010 and 2010-2011, to:

- Determine if the file includes documentation to verify household size, Number of household members enrolled in college, adjusted gross income, US income tax paid, and other untaxed income and benefits
- Agree the information above, to each selected student's Institutional Student Information Record
- Determine if, for any instance in which the documentation in the file does not support the information in the student's Institutional Student Information Record, that the Institution has recalculated the student's EFC, and if the revised EFC results in a change to the amount Federal Pell Grant, and/or Subsidized Loan disbursed to the student, verify that the institution has reported the difference between the correct and incorrect amount for each program.

Our Findings: We found that the files include documentation to verify the information listed above, that the information was in agreement with the student's Institutional Student Information Record, and that, for any changes necessitated by the review, the Institution has recalculated the Student's EFC, and if any changes resulted in a change to the Grant or loan, that the Institution has appropriately reported the change.

Program Review Finding # 9: Incorrect Return of Title IV (R2T4) Calculations:

1. Test of the assertion that all students in the 2009/2010 and 2010/2011 award years, who ceased to be enrolled during a given enrollment have been included in the Institution's list by:
 - By examination of the student files, determine if the student withdrew during the 2009/2010 or 2010/2011 award years. If the student withdrew, verify that the student is included in the list of all students in the 2009/2010 and 2010/2011 award years who ceased to be enrolled during a given enrollment period.

Our Findings: We found no instances in which students we identified as having ceased to be enrolled during a given enrollment were not appropriately identified and reported.

2. Test the assertion that the information included in the list provided by the Institution is accurate, by:
 - Specifically verifying the information included in the list for the students in step 1, above, who were found to have ceased to be enrolled during a given enrollment.

Our Findings: We found no instances incorrect information in the files for students we identified as having ceased to be enrolled during a given enrollment.

We were not engaged to, and did not; conduct an audit, the objective of which would be the expression of an opinion on the accounting records. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of Cobb Beauty College and The Department of Education and is not intended to be and should not be used by anyone other than those specified parties.

Sincerely,

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

[Redacted signature box]

J. Allen Seymour, CPA

July 12, 2012

Sherry Blackman
U.S. Department of Education
61 Forsythe Street SW
Atlanta, GA 30303

Re: Response to Preliminary Program Review Report
OPE ID: 03090600
PRCN: 201130427693

Dear Ms. Blackman:

Thank you for the extension of time that you granted via e-mail on June 5, 2012. Enclosed is the school's response to the findings of non-compliance. It includes the report of the Independent Public Accountant required by you for Finding #1, 8 and 9. The procedures used by the IPA were acknowledged by you in your e-mail of June 5 and were finally approved for use via e-mail on July 11, 2012. All of this e-mail communication is included with this report. In addition to the report of the IPA, the school has prepared a response to each of the findings in the preliminary program review report.

The program review began on a Monday. The school is scheduled to be closed on Sunday and Monday of every week, however, an employee catching up on work on that day was at the school and allowed you entry. That employee contacted me at home and I came to the school that afternoon after a pre-scheduled doctor's appointment. Unfortunately, as the program review was unscheduled and no notice had been given prior to the arrival of your team, several of the employees that would have been necessary to adequately address all of your inquiries were on vacation. As such, I believe that the majority of your findings of non-compliance were the result of a lack of understanding of the nature of your questions and an inability to communicate to you the proper response. The documentation provided with this response will address your findings and demonstrate that we are in compliance with all rules and regulations related to Title IV of the Higher Education Act of 1965.

Sincerely,

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

Gail Little
Owner, Cobb Beauty College

cc: Chris Miller

Response to Finding #1

Attendance Records: The school does now and has for many years used a software package to track student attendance on a minute by minute basis. Each student has a unique identification number and password that they enter into the computer at the reception area every time they enter or leave the building. Unfortunately, at the time of your unscheduled audit, the employee responsible for that software package was on a scheduled vacation. I did not understand the nature of the records that you were asking for and was unable to provide them to you at that time. Please allow me to explain our attendance record keeping procedures. I have included with this response letter a copy of our Student Time Collection Procedures for your review.

The school currently uses the Super Salon software package to track attendance for every student and has since January of 2011. Prior to that time, the school used the Guest Vision software system to track time. The company that provided this software stopped supporting the product and switched the school to a new software package called Premier. Unfortunately, the software company was unable to transfer the detailed historical data from the old package to the new one. As a result, the school only has available to it the hard copy reports it ran for every student prior to switching to the current attendance tracking system. These records were stored separately from the student files and that is why you did not see them at the time of your review.

We used these hard copy records to reconstruct the attendance information of all of the students that received Title IV funds in the 2009-2010 and 2010-2011 award years. Enclosed with this response is a spreadsheet that shows the clock hours for every student and how many were earned in each payment period.

In accordance with your instructions, we engaged an Independent Public Accountant to review the reconstructed records and to verify that we did indeed have a systematically organized manner for maintaining required records in keeping with 34 C.F.R. 668.24. This IPA submitted his testing procedures for your review and you approved them on July 2. Enclosed is his report of the file review which found no exceptions.

We do apologize that we were unable to provide the attendance records to you at the time of your audit. However, as we were able to reconstruct the records and by having an IPA review these records and our time collection procedures, we disagree with your finding in this particular matter. We do have a systematically organized manner for maintaining attendance records and are in compliance with the applicable statutes and regulations related to disbursement of Title IV funds.

Cobb Beauty College

Student Time Collection Procedures

Overview of Current Process

- Every student is assigned a unique employee identification number and password during orientation
- Every day, each student signs in to the Super Salon software package located on the computer at the reception desk using their unique employee identification number and password
- Whenever the student leaves, they sign out of the Super Salon software package using their unique employee identification number and password and the program stores their exact clock hours
- At the end of every week, the Academic Dean runs a hard copy printout of every student's clock hours for the prior week from the Super Salon software package
- These times are then entered manually by the Academic Dean into the student's permanent record in Premier
- At the end of every month, the Academic Dean runs a summary report from the Super Salon software package and provides it to the Business Manager for use in calculating financial aid awards
- Student's clock in and clock out times are stored on the Super Salon software for up to two months
- Hard copy printouts of the weekly and monthly reports are stored in the business office up until the point of the student leaving school
- After leaving school, time records are available on Premier for each student

Appendix A

**Student Sample
2009-2010**

<u>#</u>	<u>SSN</u>	<u>Last Name</u>	<u>First Name</u>
1.	(b)(6); (b)(7)(C), (b)(7)(C)		
2.			
3.			
4.			
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12.			
13.			
14.			
15.			

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

Attendance History for:

Cumulative

Permit: 0112

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For		Cumulative
				Hours	Days	
06/27/09	40.00	0	0	40.00	0	
07/07/09	8.00	1	8.0000	48.00	1	
07/08/09	8.00	1	8.0000	56.00	2	
07/09/09	8.00	1	8.0000	64.00	3	
07/10/09	8.00	1	8.0000	72.00	4	
07/11/09	0.00	0	0	72.00	4	
07/14/09	8.00	1	8.0000	80.00	5	
07/15/09	8.00	1	8.0000	88.00	6	
07/16/09	8.00	1	8.0000	96.00	7	
07/17/09	8.00	1	8.0000	104.00	8	
07/18/09	0.00	0	0	104.00	8	
07/21/09	8.00	1	8.0000	112.00	9	
07/22/09	8.00	1	8.0000	120.00	10	
07/23/09	8.00	1	8.0000	128.00	11	
07/24/09	8.00	1	8.0000	136.00	12	
07/25/09	0.00	0	0	136.00	12	
07/28/09	8.00	1	8.0000	144.00	13	
07/29/09	8.00	1	8.0000	152.00	14	
07/30/09	8.00	1	8.0000	160.00	15	
07/31/09	8.00	1	8.0000	168.00	16	
08/31/09	86.50	0	0	254.50	16	
09/30/09	120.00	0	0	374.50	16	
10/31/09	120.00	0	0	494.50	16	
11/25/09	104.00	0	0	598.50	16	
12/30/09	118.00	0	0	716.50	16	
01/30/10	92.44	0	0	808.94	16	
02/28/10	121.88	0	0	930.82	16	
03/31/10	114.51	0	0	1045.33	16	
04/30/10	135.72	0	0	1181.05	16	
05/13/10	49.96	0	0	1231.01	16	
05/28/10	60.70	0	0	1291.71	16	
06/30/10	130.81	0	0	1422.52	16	
07/31/10	110.32	0	0	1532.84	16	
08/31/10	147.04	0	0	1679.88	16	
09/30/10	124.78	0	0	1804.66	16	

Cumulative Data As of <u>05/29/12</u> For:		(b)(6); (b)(7)(C)	Permit: 0112	
STATISTICS:			DATES:	
Crs: COS	Crs Hrs: 1500.0	Lowest Hrs/Month: 0.00	Start: 06/09/09	Determined: / /
Total Hrs:	1804.66	Higest Hrs/Month: 147.04	Drop: / /	Cntrct Grad: 09/22/10
Transfer Hrs :	0.00	SSN: [REDACTED]	ReEnroll: / /	ProjGrad: 12/11/10
GrandTot Hrs:	1804.66	Active?: No	Drop2: / /	Graduate: 10/09/10
Remaining Hrs:	-304.66	SAP?: Yes	ReEnroll12: / /	LOA: / / - / /
% Complete:	120.311	GPA: 86.17	Drop3: / /	Loan Ent: / /
		Attn ID#:	ReEnroll13: / /	Loan Exit: / /
AMA: 110.09 Over Contract? YES!!!				
At This Attendance Rate You may Pay \$2856.99 For Poor Attendance Before You Graduate				

Attendance History for: Cumulative
(b)(6); (b)(7)(C); (b)(7)(C) Permit: 5169

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For	
				Hours	Days
02/28/10	57.67	0	0	57.67	0
03/31/10	122.93	0	0	180.60	0
04/30/10	135.07	0	0	315.67	0
05/13/10	57.06	0	0	372.73	0
05/28/10	32.65	0	0	405.38	0
05/28/10	30.77	0	0	436.15	0
06/30/10	84.25	0	0	520.40	0
06/30/10	10.00	0	0	530.40	0
07/31/10	93.15	0	0	623.55	0
08/31/10	112.17	0	0	735.72	0
09/30/10	123.76	0	0	859.48	0
10/31/10	61.10	0	0	920.58	0
10/31/10	67.78	0	0	988.36	0
11/30/10	94.31	0	0	1082.67	0
12/31/10	182.11	0	0	1264.78	0
01/17/11	46.08	0	0	1310.86	0
01/31/11	85.43	0	0	1396.29	0
02/08/11	47.37	0	0	1443.66	0
02/09/11	7.90	0	0	1451.56	0
02/10/11	11.64	0	0	1463.20	0
02/11/11	7.03	0	0	1470.23	0
02/12/11	7.13	0	0	1477.36	0
02/19/11	43.71	0	0	1521.07	0
02/22/11	11.18	0	0	1532.25	0
02/23/11	6.68	0	0	1538.93	0
02/24/11	10.82	0	0	1549.75	0
02/25/11	7.05	0	0	1556.80	0
02/26/11	7.10	0	0	1563.90	0
03/01/11	6.89	0	0	1570.79	0
03/02/11	7.88	0	0	1578.67	0
03/03/11	10.00	0	0	1588.67	0
03/04/11	7.32	0	0	1595.99	0
03/05/11	6.52	0	0	1602.51	0
03/08/11	10.77	0	0	1613.28	0
03/09/11	6.65	0	0	1619.93	0
03/10/11	11.08	0	0	1631.01	0
03/11/11	7.63	0	0	1638.64	0
03/12/11	6.75	0	0	1645.39	0
03/15/11	8.28	0	0	1653.67	0
03/16/11	7.20	0	0	1660.87	0
03/17/11	7.24	0	0	1668.11	0
03/18/11	7.82	0	0	1675.93	0
03/22/11	9.21	0	0	1685.14	0
03/23/11	7.19	0	0	1692.33	0
03/24/11	8.00	0	0	1700.33	0
03/25/11	7.08	0	0	1707.41	0
03/26/11	6.87	0	0	1714.28	0
03/29/11	5.82	0	0	1720.10	0

Attendance History for:

Cumulative

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

Permit: 5169

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For Hours	Cumulative Total For Days	Cumulative
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Cumulative Data As of <u>05/29/12</u> For:		(b)(6); (b)(7)(C)		Permit: 5169	
STATISTICS:			DATES:		
Crs: COS	Crs Hrs: 15000	Lowest Hrs/Month: 5.82	Start: 02/16/10	Determined: / /	
Total Hrs:	1720.10	Higest Hrs/Month: 182.11	Drop: / /	Cntrct Grad: 03/16/11	
Transfer Hrs :	0.00	SSN: [REDACTED]	ReEnroll: / /	ProjGrad: 12/30/17	
GrandTot Hrs:	1720.10	Active?: Yes	Drop2: / /	Graduate: / /	
Remaining Hrs:	13279.90	SAP?: Yes	ReEnroll12: / /	LOA: / / - / /	
% Complete:	11.4673	GPA: 82.68	Drop3: / /	Loan Ent: / /	
		Attn ID#: 5169	ReEnroll13: / /	Loan Exit: / /	
AMA: 104.64 Over Contract? YES!!!					
At This Attendance Rate You may Pay 84242.10 For Poor Attendance Before You Graduate					

Attendance History for: (b)(6); (b)(7)(C), (b)(7)(C)

Cumulative
Permit: 1774

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For		Cumulative
				Hours	Days	
10/31/09	24.00	0	0	24.00	0	

Cumulative Data As of 05/29/12 For: (b)(6); (b)(7)(C) Permit: 1774

STATISTICS:				DATES:			
Crs: COS	Crs Hrs: 1500.0	Lowest Hrs/Month:	24.00	Start:	10/27/09	Determined:	/ /
Total Hrs:	24.00	Higest Hrs/Month:	24.00	Drop:	12/05/09	Cntrct Grad:	04/27/11
Transfer Hrs :	0.00	SSN:	[REDACTED]	ReEnroll:	/ /	ProjGrad:	09/16/10
GrandTot Hrs:	24.00	Active?:	No	Drop2:	/ /	Graduate:	/ /
Remaining Hrs:	1476.00	SAP?:	Yes	ReEnroll12:	/ /	LOA:	/ / - / /
% Complete:	1.6000	GPA:	93.00	Drop3:	/ /	Loan Ent	/ /
		Attn ID#:		ReEnroll13:	/ /	Loan Exit	/ /
AMA: 123.31 Over Contract? No							

Attendance History for: (b)(6); (b)(7)(C), (b)(7)(C) Cumulative
 Permit: 9877

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For	
				Hours	Days
08/31/09	67.30	0	0	67.30	0
09/30/09	183.00	0	0	250.30	0
10/31/09	140.00	0	0	390.30	0
11/25/09	104.00	0	0	494.30	0
12/30/09	118.00	0	0	612.30	0
01/29/10	144.56	0	0	756.86	0

Cumulative Data As of <u>05/29/12</u> For: (b)(6); (b)(7)(C)		Permit: 9877
STATISTICS:		
Crs: COS	Crs Hrs: 1500.0	Lowest Hrs/Month: 67.30
Total Hrs:	756.86	Higest Hrs/Month: 183.00
Transfer Hrs :	0.00	SSN: XXXXXXXXXX
GrandTot Hrs:	756.86	Active?: No
Remaining Hrs:	743.14	SAP?: NO*NO*NO*
% Complete:	50.4573	GPA: 87.42
		Attn ID#:
DATES:		
Start:	08/18/09	Drop:
Drop:	02/20/10	ReEnroll:
ReEnroll:	/ /	Drop2:
Drop2:	/ /	ReEnroll12:
ReEnroll12:	/ /	Drop3:
Drop3:	/ /	ReEnroll13:
ReEnroll13:	/ /	
AMA: 66.09 Over Contract? YES!!!		
At This Attendance Rate You may Pay \$3838.03 For Poor Attendance Before You Graduate		

Attendance History for:

Cumulative

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

Permit: 7719

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For		Cumulative
				Hours	Days	
01/29/10	83.04	0	0	83.04	0	
02/28/10	94.74	0	0	177.78	0	
03/31/10	85.57	0	0	263.35	0	
04/30/10	100.53	0	0	363.88	0	
05/13/10	33.73	0	0	397.61	0	
05/28/10	58.22	0	0	455.83	0	
05/28/10	4.48	0	0	460.31	0	
06/30/10	93.54	0	0	553.85	0	
07/31/10	9.42	0	0	563.27	0	
08/31/10	118.34	0	0	681.61	0	
09/30/10	12.27	0	0	693.88	0	
09/30/10	121.85	0	0	815.73	0	
10/31/10	49.57	0	0	865.30	0	
10/31/10	78.40	0	0	943.70	0	
11/30/10	110.12	0	0	1053.82	0	
12/31/10	199.05	0	0	1252.87	0	
01/17/11	30.07	0	0	1282.94	0	
01/31/11	62.75	0	0	1345.69	0	
02/08/11	49.14	0	0	1394.83	0	
02/08/11	8.28	0	0	1403.11	0	
02/09/11	8.00	0	0	1411.11	0	
02/19/11	37.12	0	0	1448.23	0	
02/22/11	4.97	0	0	1453.20	0	
02/23/11	4.97	0	0	1458.17	0	
02/24/11	7.58	0	0	1465.75	0	
02/25/11	7.97	0	0	1473.72	0	
02/26/11	7.05	0	0	1480.77	0	
03/01/11	7.88	0	0	1488.65	0	
03/02/11	8.20	0	0	1496.85	0	
03/03/11	7.63	0	0	1504.48	0	
03/04/11	8.08	0	0	1512.56	0	
03/05/11	6.68	0	0	1519.24	0	
03/08/11	2.83	0	0	1522.07	0	
03/09/11	7.08	0	0	1529.15	0	
03/10/11	7.54	0	0	1536.69	0	
03/11/11	8.02	0	0	1544.71	0	
03/12/11	7.45	0	0	1552.16	0	
03/15/11	8.13	0	0	1560.29	0	
03/17/11	8.04	0	0	1568.33	0	
03/18/11	2.43	0	0	1570.76	0	
03/19/11	7.02	0	0	1577.78	0	
03/22/11	7.53	0	0	1585.31	0	
03/23/11	8.02	0	0	1593.33	0	
03/24/11	9.60	0	0	1602.93	0	
03/25/11	7.82	0	0	1610.75	0	
03/29/11	7.65	0	0	1618.40	0	
03/30/11	7.60	0	0	1626.00	0	
03/31/11	3.38	0	0	1629.38	0	
04/05/11	4.47	0	0	1633.85	0	
04/06/11	8.35	0	0	1642.20	0	
04/07/11	8.33	0	0	1650.53	0	
04/08/11	7.98	0	0	1658.51	0	
04/09/11	6.85	0	0	1665.36	0	
04/12/11	7.84	0	0	1673.20	0	
04/13/11	7.97	0	0	1681.17	0	

Attendance History for:

Cumulative

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

Permit: 7719

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For		Cumulative
				Hours	Days	
04/14/11	7.95	0	0	1689.12	0	
04/15/11	7.52	0	0	1696.64	0	
04/16/11	6.48	0	0	1703.12	0	
04/19/11	6.72	0	0	1709.84	0	
04/21/11	8.03	0	0	1717.87	0	
04/22/11	5.81	0	0	1723.68	0	
04/23/11	6.33	0	0	1730.01	0	
04/26/11	7.92	0	0	1737.93	0	
04/27/11	6.72	0	0	1744.65	0	
04/28/11	8.13	0	0	1752.78	0	
04/29/11	7.10	0	0	1759.88	0	
04/30/11	7.60	0	0	1767.48	0	
05/03/11	7.85	0	0	1775.33	0	
05/04/11	7.57	0	0	1782.90	0	
05/05/11	6.28	0	0	1789.18	0	
05/06/11	8.08	0	0	1797.26	0	
05/07/11	6.68	0	0	1803.94	0	
05/07/11	8.13	0	0	1812.07	0	
05/10/11	8.87	0	0	1820.94	0	
05/11/11	7.47	0	0	1828.41	0	
05/12/11	9.12	0	0	1837.53	0	
05/13/11	8.00	0	0	1845.53	0	
05/14/11	8.23	0	0	1853.76	0	
05/17/11	7.80	0	0	1861.56	0	
05/18/11	8.10	0	0	1869.66	0	
05/19/11	8.82	0	0	1878.48	0	
05/20/11	7.98	0	0	1886.46	0	
05/21/11	6.95	0	0	1893.41	0	
05/24/11	9.88	0	0	1903.29	0	
05/25/11	7.69	0	0	1910.98	0	
05/26/11	6.75	0	0	1917.73	0	

Cumulative Data As of <u>05/29/12</u> For: (b)(6); (b)(7)(C)			Permit: 7719		
STATISTICS:			DATES:		
Crs: COS	Crs Hrs: 1500.0	Lowest Hrs/Month: 2.43	Start: 01/05/10	Determined: / /	
Total Hrs:	1917.73	Higest Hrs/Month: 199.05	Drop: / /	Cntrct Grad: 02/05/11	
Transfer Hrs :	0.00	SSN: [REDACTED]	ReEnroll: / /	ProjGrad: 07/06/12	
GrandTot Hrs:	1917.73	Active?: Yes	Drop2: / /	Graduate: / /	
Remaining Hrs:	-417.73	SAP?: Yes	ReEnroll12: / /	LOA: / / - / /	
% Complete:	127.849	GPA: 83.08	Drop3: / /	Loan Ent: / /	
		Attn ID#: 7719	ReEnroll13: / /	Loan Exit: / /	
AMA: 80.78 Over Contract? YES!!!					
At This Attendance Rate You may Pay 13556.70 For Poor Attendance Before You Graduate					

Attendance History for: Cumulative
(b)(6); (b)(7)(C), (b)(7)(C) Permit: 1847

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For		Cumulative
				Hours	Days	
08/12/08	7.75	1	7.7500	7.75	1	
08/13/08	7.75	1	7.7500	15.50	2	
08/14/08	7.75	1	7.7500	23.25	3	
08/15/08	7.75	1	7.7500	31.00	4	
08/16/08	0.00	0	0	31.00	4	
08/19/08	6.75	1	6.7500	37.75	5	
08/20/08	6.75	1	6.7500	44.50	6	
08/21/08	6.75	1	6.7500	51.25	7	
08/22/08	6.75	1	6.7500	58.00	8	
08/23/08	1.00	0	0	59.00	8	
08/26/08	6.75	1	6.7500	65.75	9	
08/27/08	7.32	1	7.3200	73.07	10	
08/28/08	5.97	1	5.9700	79.04	11	
08/29/08	6.45	1	6.4500	85.49	12	
09/02/08	5.45	1	5.4500	90.94	13	
09/03/08	8.25	1	8.2500	99.19	14	
09/04/08	8.17	1	8.1700	107.36	15	
09/05/08	8.17	1	8.1700	115.53	16	
09/06/08	75.00	1	75.0000	190.53	17	
09/09/08	12.70	1	12.7000	203.23	18	
09/10/08	8.00	1	8.0000	211.23	19	
09/11/08	5.62	1	5.6200	216.85	20	
09/12/08	0.00	0	0	216.85	20	
09/13/08	5.57	1	5.5700	222.42	21	
09/16/08	5.58	1	5.5800	228.00	22	
09/17/08	0.00	0	0	228.00	22	
09/18/08	5.25	1	5.2500	233.25	23	
09/19/08	0.00	0	0	233.25	23	
09/20/08	0.00	0	0	233.25	23	
09/23/08	6.63	1	6.6300	239.88	24	
09/24/08	0.00	0	0	239.88	24	
09/25/08	5.08	1	5.0800	244.96	25	
09/26/08	0.00	0	0	244.96	25	
09/27/08	0.00	0	0	244.96	25	
09/30/08	4.92	1	4.9200	249.88	26	
10/01/08	0.00	0	0	249.88	26	
10/02/08	6.35	1	6.3500	256.23	27	
10/03/08	0.00	0	0	256.23	27	
10/04/08	4.68	1	4.6800	260.91	28	
10/07/08	6.52	1	6.5200	267.43	29	
10/08/08	0.00	0	0	267.43	29	
10/09/08	5.10	1	5.1000	272.53	30	
10/10/08	0.00	0	0	272.53	30	
10/11/08	0.00	0	0	272.53	30	
10/14/08	5.15	1	5.1500	277.68	31	
10/15/08	0.00	0	0	277.68	31	
10/16/08	0.00	0	0	277.68	31	
10/17/08	0.00	0	0	277.68	31	
10/18/08	0.00	0	0	277.68	31	
10/21/08	5.60	1	5.6000	283.28	32	
10/22/08	0.00	0	0	283.28	32	
10/23/08	4.70	1	4.7000	287.98	33	
10/24/08	0.00	0	0	287.98	33	
10/25/08	0.00	0	0	287.98	33	
10/28/08	8.67	1	8.6700	296.65	34	

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

Dance History for:

Cumulative

Permit: 1847

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For		Cumulative
				Hours	Days	
10/29/08	0.00	0	0	296.65	34	
10/30/08	6.45	1	6.4500	303.10	35	
10/31/08	0.40	0	0	303.50	35	
11/01/08	6.62	1	6.6200	310.12	36	
11/04/08	4.70	1	4.7000	314.82	37	
11/05/08	0.00	0	0	314.82	37	
11/06/08	4.63	1	4.6300	319.45	38	
11/07/08	0.00	0	0	319.45	38	
11/08/08	7.75	1	7.7500	327.20	39	
11/11/08	5.72	1	5.7200	332.92	40	
11/12/08	0.00	0	0	332.92	40	
11/13/08	5.07	1	5.0700	337.99	41	
11/14/08	0.00	0	0	337.99	41	
11/15/08	5.57	1	5.5700	343.56	42	
11/18/08	9.60	1	9.6000	353.16	43	
11/19/08	0.00	0	0	353.16	43	
11/20/08	5.65	1	5.6500	358.81	44	
11/21/08	0.00	0	0	358.81	44	
11/22/08	6.45	0	0	365.26	44	
11/25/08	7.07	1	7.0700	372.33	45	
12/02/08	5.13	1	5.1300	377.46	46	
12/03/08	0.00	0	0	377.46	46	
12/04/08	0.00	0	0	377.46	46	
12/05/08	0.00	0	0	377.46	46	
12/06/08	0.00	0	0	377.46	46	
12/09/08	6.20	1	6.2000	383.66	47	
12/10/08	0.00	0	0	383.66	47	
12/11/08	5.00	1	5.0000	388.66	48	
12/12/08	0.00	0	0	388.66	48	
12/13/08	6.38	1	6.3800	395.04	49	
12/16/08	5.33	1	5.3300	400.37	50	
12/17/08	0.00	0	0	400.37	50	
12/18/08	5.83	1	5.8300	406.20	51	
12/19/08	0.00	0	0	406.20	51	
12/20/08	7.30	1	7.3000	413.50	52	
01/06/09	5.12	1	5.1200	418.62	53	
01/06/09	5.12	1	5.1200	423.74	54	
01/07/09	0.00	0	0	423.74	54	
01/07/09	0.00	0	0	423.74	54	
01/08/09	0.00	0	0	423.74	54	
01/08/09	0.00	0	0	423.74	54	
01/09/09	0.00	0	0	423.74	54	
01/09/09	0.00	0	0	423.74	54	
01/10/09	0.00	0	0	423.74	54	
01/10/09	0.00	0	0	423.74	54	
01/13/09	5.97	1	5.9700	429.71	55	
01/14/09	0.00	0	0	429.71	55	
01/15/09	5.82	1	5.8200	435.53	56	
01/16/09	0.00	0	0	435.53	56	
01/17/09	0.00	0	0	435.53	56	
01/20/09	6.02	1	6.0200	441.55	57	
01/21/09	0.00	0	0	441.55	57	
01/22/09	5.62	1	5.6200	447.17	58	
01/23/09	0.00	0	0	447.17	58	
01/24/09	6.43	1	6.4300	453.60	59	

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Attendance History for:

Cumulative

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

Permit: 1847

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For		Cumulative
				Hours	Days	
01/27/09	5.17	1	5.1700	458.77	60	
01/28/09	0.00	0	0	458.77	60	
01/29/09	11.52	1	11.5200	470.29	61	
01/30/09	0.00	0	0	470.29	61	
01/31/09	7.00	1	7.0000	477.29	62	
02/03/09	5.15	1	5.1500	482.44	63	
02/04/09	0.00	0	0	482.44	63	
02/05/09	5.28	1	5.2800	487.72	64	
02/06/09	0.00	0	0	487.72	64	
02/07/09	7.73	1	7.7300	495.45	65	
02/10/09	0.00	0	0	495.45	65	
02/11/09	0.00	0	0	495.45	65	
02/12/09	5.85	1	5.8500	501.30	66	
02/13/09	0.00	0	0	501.30	66	
02/14/09	0.00	0	0	501.30	66	
02/17/09	4.97	1	4.9700	506.27	67	
02/18/09	0.00	0	0	506.27	67	
02/19/09	4.32	1	4.3200	510.59	68	
02/20/09	0.00	0	0	510.59	68	
02/21/09	4.73	1	4.7300	515.32	69	
02/24/09	0.00	0	0	515.32	69	
02/25/09	0.00	0	0	515.32	69	
02/26/09	0.00	0	0	515.32	69	
02/27/09	0.00	0	0	515.32	69	
02/28/09	0.00	0	0	515.32	69	
03/03/09	0.00	0	0	515.32	69	
03/04/09	0.00	0	0	515.32	69	
03/05/09	5.25	1	5.2500	520.57	70	
03/06/09	0.00	0	0	520.57	70	
03/07/09	0.00	0	0	520.57	70	
03/10/09	0.00	0	0	520.57	70	
03/11/09	0.00	0	0	520.57	70	
03/12/09	5.13	1	5.1300	525.70	71	
03/13/09	0.00	0	0	525.70	71	
03/14/09	7.03	1	7.0300	532.73	72	
03/17/09	4.93	1	4.9300	537.66	73	
03/18/09	0.00	0	0	537.66	73	
03/19/09	5.30	1	5.3000	542.96	74	
03/20/09	0.00	0	0	542.96	74	
03/21/09	5.95	1	5.9500	548.91	75	
03/24/09	5.02	1	5.0200	553.93	76	
03/25/09	0.00	0	0	553.93	76	
03/26/09	5.58	1	5.5800	559.51	77	
03/27/09	0.00	0	0	559.51	77	
03/28/09	6.37	1	6.3700	565.88	78	
03/31/09	6.00	1	6.0000	571.88	79	
04/01/09	0.00	0	0	571.88	79	
04/02/09	4.90	1	4.9000	576.78	80	
04/03/09	0.00	0	0	576.78	80	
04/04/09	0.00	0	0	576.78	80	
04/07/09	5.12	1	5.1200	581.90	81	
04/08/09	0.00	0	0	581.90	81	
04/09/09	4.87	1	4.8700	586.77	82	
04/10/09	0.00	0	0	586.77	82	
04/11/09	5.62	1	5.6200	592.39	83	

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Attendance History for: Cumulative
(b)(6); (b)(7)(C); (b)(7)(C) Permit: 1847

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For	
				Hours	Days
04/14/09	5.05	1	5.0500	597.44	84
04/15/09	0.00	0	0	597.44	84
04/16/09	5.07	1	5.0700	602.51	85
04/17/09	0.00	0	0	602.51	85
04/18/09	6.77	1	6.7700	609.28	86
04/21/09	4.82	1	4.8200	614.10	87
04/22/09	0.00	0	0	614.10	87
04/23/09	5.18	1	5.1800	619.28	88
04/24/09	0.00	0	0	619.28	88
04/25/09	0.00	0	0	619.28	88
04/28/09	5.62	1	5.6200	624.90	89
04/29/09	0.00	0	0	624.90	89
04/30/09	5.10	1	5.1000	630.00	90
05/01/09	0.00	0	0	630.00	90
05/02/09	7.52	1	7.5200	637.52	91
05/05/09	5.72	1	5.7200	643.24	92
05/06/09	0.00	0	0	643.24	92
05/07/09	4.90	1	4.9000	648.14	93
05/08/09	0.00	0	0	648.14	93
05/09/09	6.52	1	6.5200	654.66	94
05/12/09	3.37	1	3.3700	658.03	95
05/13/09	0.00	0	0	658.03	95
05/14/09	4.87	1	4.8700	662.90	96
05/15/09	0.00	0	0	662.90	96
05/16/09	7.35	1	7.3500	670.25	97
05/19/09	5.15	1	5.1500	675.40	98
05/20/09	4.82	1	4.8200	680.22	99
05/21/09	5.67	1	5.6700	685.89	100
05/22/09	0.00	0	0	685.89	100
05/26/09	5.20	1	5.2000	691.09	101
05/27/09	3.63	1	3.6300	694.72	102
05/28/09	5.62	1	5.6200	700.34	103
05/29/09	0.00	0	0	700.34	103
05/30/09	7.58	1	7.5800	707.92	104
06/02/09	4.95	1	4.9500	712.87	105
06/03/09	0.00	0	0	712.87	105
06/04/09	5.30	1	5.3000	718.17	106
06/05/09	0.00	0	0	718.17	106
06/06/09	7.08	1	7.0800	725.25	107
06/09/09	5.40	1	5.4000	730.65	108
06/10/09	4.80	1	4.8000	735.45	109
06/11/09	5.10	1	5.1000	740.55	110
06/12/09	0.00	0	0	740.55	110
06/13/09	6.78	1	6.7800	747.33	111
06/16/09	4.10	1	4.1000	751.43	112
06/17/09	3.62	1	3.6200	755.05	113
06/18/09	5.20	1	5.2000	760.25	114
06/19/09	0.00	0	0	760.25	114
06/20/09	6.47	1	6.4700	766.72	115
06/23/09	4.78	1	4.7800	771.50	116
06/24/09	4.58	1	4.5800	776.08	117
06/25/09	0.00	0	0	776.08	117
06/26/09	0.00	0	0	776.08	117
06/27/09	0.00	0	0	776.08	117
07/07/09	5.25	1	5.2500	781.33	118

Attendance History for: Cumulative
 (b)(6); (b)(7)(C), (b)(7)(C) Permit: 1847

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For		Cumulative
				Hours	Days	
07/08/09	0.00	0	0	781.33	118	
07/09/09	0.00	0	0	781.33	118	
07/10/09	0.00	0	0	781.33	118	
07/11/09	0.00	0	0	781.33	118	
07/14/09	4.82	1	4.8200	786.15	119	
07/15/09	3.93	1	3.9300	790.08	120	
07/16/09	5.13	1	5.1300	795.21	121	
07/17/09	0.00	0	0	795.21	121	
07/18/09	5.78	1	5.7800	800.99	122	
07/21/09	5.50	1	5.5000	806.49	123	
07/22/09	0.00	0	0	806.49	123	
07/23/09	5.37	1	5.3700	811.86	124	
07/24/09	0.00	0	0	811.86	124	
07/25/09	5.97	1	5.9700	817.83	125	
07/28/09	5.40	1	5.4000	823.23	126	
07/29/09	0.00	0	0	823.23	126	
07/30/09	5.82	1	5.8200	829.05	127	
07/31/09	0.00	0	0	829.05	127	
08/31/09	93.40	0	0	922.45	127	
09/30/09	100.00	0	0	1022.45	127	
10/31/09	100.00	0	0	1122.45	127	
11/25/09	90.00	0	0	1212.45	127	
12/30/09	90.00	0	0	1302.45	127	
01/30/10	68.63	0	0	1371.08	127	
02/28/10	66.17	0	0	1437.25	127	
03/31/10	64.72	0	0	1501.97	127	

Cumulative Data As of <u>05/29/12</u> For: (b)(6); (b)(7)(C)		Permit: 1847	
STATISTICS:			
Crs: COS	Crs Hrs: 1500.0	Lowest Hrs/Month: 0.00	Start: 08/12/08
Total Hrs:	1501.97	Highest Hrs/Month: 100.00	Determined: / /
Transfer Hrs :	0.00	SSN: [REDACTED]	Drop: / /
GrandTot Hrs:	1501.97	Active?: No	ReEnroll: / /
Remaining Hrs:	-1.97	SAP?: Yes	Drop2: / /
% Complete:	100.131	GPA: 81.28	ReEnroll12: / /
		Attn ID#:	Drop3: / /
			ReEnroll13: / /
DATES:			
			Contract Grad: 06/12/10
			Proj Grad: 09/21/10
			Graduate: 04/29/10
			LOA: / / - / /
			Loan Ent: / /
			Loan Exit: / /
AMA: 72.66 Over Contract? YES!!!			
At This Attendance Rate You may Pay \$2378.60 For Poor Attendance Before You Graduate			

Attendance History for: Cumulative
 (b)(6); (b)(7)(C), (b)(7)(C) Permit: 7647

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For		Cumulative
				Hours	Days	
12/31/09	60.00	0	0	60.00	0	
01/05/10	5.00	0	0	65.00	0	
02/28/10	26.06	0	0	91.06	0	
03/31/10	63.11	0	0	154.17	0	
04/30/10	59.02	0	0	213.19	0	
05/13/10	16.36	0	0	229.55	0	
05/28/10	43.72	0	0	273.27	0	
06/30/10	53.51	0	0	326.78	0	
07/31/10	24.95	0	0	351.73	0	
08/31/10	53.89	0	0	405.62	0	

Cumulative Data As of 05/29/12 For: (b)(6); (b)(7)(C) Permit: 7647

STATISTICS:				DATES:			
Crs: COS	Crs Hrs: 1500.0	Lowest Hrs/Month:	5.00	Start:	12/01/09	Determined:	/ /
Total Hrs:	405.62	Highest Hrs/Month:	63.11	Drop:	/ /	Contract Grad:	06/11/11
Transfer Hrs :	0.00	SSN:	[REDACTED]	ReEnroll:	/ /	ProjGrad:	06/10/13
GrandTot Hrs:	405.62	Active?:	Yes	Drop2:	/ /	Graduate:	/ /
Remaining Hrs:	1094.38	SAP?:	Yes	ReEnroll12:	/ /	LOA:	/ / - / /
% Complete:	27.0413	GPA:	89.00	Drop3:	/ /	Loan Ent	/ /
		Attn ID#:	7647	ReEnroll13:	/ /	Loan Exit	/ /
AMA: 42.40 Over Contract? YES!!!							
At This Attendance Rate You may Pay 10058.50 For Poor Attendance Before You Graduate							

Attendance History for: Cumulative

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

Permit: 9953

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For		Cumulative
				Hours	Days	
05/12/09	7.50	1	7.5000	7.50	1	
05/13/09	7.50	1	7.5000	15.00	2	
05/14/09	0.00	0	0	15.00	2	
05/15/09	7.50	1	7.5000	22.50	3	
05/19/09	7.58	1	7.5800	30.08	4	
05/20/09	7.83	1	7.8300	37.91	5	
05/21/09	0.00	0	0	37.91	5	
05/22/09	7.67	1	7.6700	45.58	6	
05/26/09	7.58	1	7.5800	53.16	7	
05/27/09	7.92	1	7.9200	61.08	8	
05/28/09	0.00	0	0	61.08	8	
05/29/09	7.50	1	7.5000	68.58	9	
05/30/09	0.00	0	0	68.58	9	
06/02/09	0.00	0	0	68.58	9	
06/03/09	7.67	1	7.6700	76.25	10	
06/04/09	0.00	0	0	76.25	10	
06/05/09	7.92	1	7.9200	84.17	11	
06/06/09	0.00	0	0	84.17	11	
06/09/09	7.50	1	7.5000	91.67	12	
06/10/09	7.50	1	7.5000	99.17	13	
06/11/09	0.00	0	0	99.17	13	
06/12/09	7.50	1	7.5000	106.67	14	
06/13/09	0.00	0	0	106.67	14	
06/16/09	7.50	1	7.5000	114.17	15	
06/17/09	7.50	1	7.5000	121.67	16	
06/18/09	0.00	0	0	121.67	16	
06/19/09	7.50	1	7.5000	129.17	17	
06/20/09	0.00	0	0	129.17	17	
06/23/09	7.50	1	7.5000	136.67	18	
06/24/09	7.50	1	7.5000	144.17	19	
06/25/09	0.00	0	0	144.17	19	
06/26/09	7.50	1	7.5000	151.67	20	
06/27/09	0.00	0	0	151.67	20	
07/07/09	7.50	1	7.5000	159.17	21	
07/08/09	7.50	1	7.5000	166.67	22	
07/09/09	0.00	0	0	166.67	22	
07/10/09	7.50	1	7.5000	174.17	23	
07/11/09	0.00	0	0	174.17	23	
07/14/09	7.50	1	7.5000	181.67	24	
07/15/09	7.50	1	7.5000	189.17	25	
07/16/09	0.00	0	0	189.17	25	
07/17/09	7.50	1	7.5000	196.67	26	
07/18/09	0.00	0	0	196.67	26	
07/21/09	7.50	1	7.5000	204.17	27	
07/22/09	7.50	1	7.5000	211.67	28	
07/23/09	0.00	0	0	211.67	28	
07/24/09	7.50	1	7.5000	219.17	29	
07/25/09	0.00	0	0	219.17	29	
07/28/09	7.50	1	7.5000	226.67	30	
07/29/09	7.50	1	7.5000	234.17	31	
07/30/09	0.00	0	0	234.17	31	
07/31/09	7.50	1	7.5000	241.67	32	
08/31/09	74.80	0	0	316.47	32	
09/30/09	104.07	0	0	420.54	32	
10/31/09	80.00	0	0	500.54	32	

Attendance History for: (b)(6); (b)(7)(C); (b)(7)(C) Cumulative
Permit: 9953

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For		Cumulative
				Hours	Days	
11/25/09	60.00	0	0	560.54	32	
12/30/09	74.00	0	0	634.54	32	
01/30/10	93.44	0	0	727.98	32	
02/28/10	88.79	0	0	816.77	32	
03/31/10	53.62	0	0	870.39	32	

Cumulative Data As of <u>05/29/12</u> For: (b)(6); (b)(7)(C)		Permit: 9953
STATISTICS:		
Crs: COS	Crs Hrs: 1500.0	Lowest Hrs/Month: 0.00
Total Hrs:	870.39	Higest Hrs/Month: 104.07
Transfer Hrs :	0.00	SSN: XXXXXXXXXX
GrandTot Hrs:	870.39	Active?: No
Remaining Hrs:	629.61	SAP?: Yes
% Complete:	58.0260	GPA: 83.91
		Attn ID#:
DATES:		
Start:	05/12/09	Determined: / /
Drop:	03/29/10	Cntrct Grad: 05/23/10
ReEnroll:	/ /	ProjGrad: 07/02/11
Drop2:	/ /	Graduate: / /
ReEnroll2:	/ /	LOA: / / - / /
Drop3:	/ /	Loan Ent / /
ReEnroll3:	/ /	Loan Exit / /
AMA: 63.79 Over Contract? YES!!!		
At This Attendance Rate You may Pay \$4426.16 For Poor Attendance Before You Graduate		

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SMART Systems, Inc.
COBB BEAUTY COLLEGE, INC.

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Attendance History for:

Cumulative

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

Permit: 5877

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For	
				Hours	Days
10/31/09	40.00	0	0	40.00	0
11/25/09	60.00	0	0	100.00	0
12/30/09	60.00	0	0	160.00	0

Cumulative Data As of 05/29/12 For:

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

Permit: 5877

STATISTICS:

Crs: COS Crs Hrs: 1500.0
Total Hrs: 160.00
Transfer Hrs : 0.00
GrandTot Hrs: 160.00
Remaining Hrs: 1340.00
% Complete: 10.6667

Lowest Hrs/Month: 40.00
Higest Hrs/Month: 60.00
SSN: [REDACTED]
Active?: No
SAP?: NO*NO*NO*
GPA: 91.33
Attn ID#:

DATES:

Start: 10/13/09 Determined: / /
Drop: 04/01/10 Cntrct Grad: 08/08/11
ReEnroll: / / Proj Grad: 11/30/11
Drop2: / / Graduated: / /
ReEnroll12: / / LOA: 01/01/11 - 02/01/11
Drop3: / / Loan Ent: / /
ReEnroll13: / / Loan Work: / /

AMA: 23.85 Over Contract? YES!!!

At This Attendance Rate You may Pay \$6534.39 For Poor Attendance Before You Graduate

Attendance History for: Cumulative
 (b)(6); (b)(7)(C); (b)(7)(C) Permit: 1439

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For		Cumulative
				Hours	Days	
09/30/09	120.00	0	0	120.00	0	
10/31/09	133.50	0	0	253.50	0	
11/25/09	60.00	0	0	313.50	0	
12/30/09	60.00	0	0	373.50	0	
01/29/10	22.82	0	0	396.32	0	

Cumulative Data As of <u>05/29/12</u> For: (b)(6); (b)(7)(C)		Permit: 1439	
STATISTICS:		DATES:	
Crs: COS	Crs Hrs: 15000	Lowest Hrs/Month: 22.82	Start: 09/08/09
Total Hrs:	396.32	Highest Hrs/Month: 133.50	Determined: / /
Transfer Hrs :	0.00	SSN: (b)(6)	Drop: 01/22/10
GrandTot Hrs:	396.32	Active?: No	Cntrct Grad: 10/08/10
Remaining Hrs:	14603.68	SAP?: Yes	ReEnroll: / /
% Complete:	2.6421	GPA: 93.91	ProjGrad: 09/09/16
		Attn ID#:	Drop2: / /
			Graduate: / /
			LOA: / / - / /
			Drop3: / /
			Loan Ent: / /
			ReEnroll13: / /
			Loan Exit: / /
AMA: 58.28 Over Contract? YES!!!			
At This Attendance Rate You may Pay 40903.80 For Poor Attendance Before You Graduate			

Attendance History for:

Cumulative

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

Permit: 1033

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For		Cumulative
				Hours	Days	
08/31/09	82.30	0	0	82.30	0	
09/30/09	100.00	0	0	182.30	0	
10/31/09	120.00	0	0	302.30	0	
11/25/09	90.00	0	0	392.30	0	
12/30/09	90.00	0	0	482.30	0	
01/13/10	29.71	0	0	512.01	0	

Cumulative Data As of <u>05/29/12</u> For:		(b)(6); (b)(7(C))		Permit: 1033	
STATISTICS:			DATES:		
Crs: COS	Crs Hrs: 1500.0	Lowest Hrs/Month: 29.71	Start: 08/04/09	Determined: / /	
Total Hrs:	512.01	Higest Hrs/Month: 120.00	Drop: 01/15/10	Cntrct Grad: 08/20/10	
Transfer Hrs :	0.00	SSN: [REDACTED]	ReEnroll: / /	ProjGrad: 12/12/11	
GrandTot Hrs:	512.01	Active?: No	Drop2: / /	Graduate: / /	
Remaining Hrs:	987.99	SAP?: NO*NO*NO*	ReEnroll12: / /	LOA: / / - / /	
% Complete:	34.1340	GPA: 83.25	Drop3: / /	Loan Ent / /	
		Attn ID#:	ReEnroll13: / /	Loan Exit / /	
AMA: 43.01 Over Contract? YES!!!					
At This Attendance Rate You may Pay \$6667.39 For Poor Attendance Before You Graduate					

Attendance History for:

Cumulative

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

Permit: 8140

Date	Hours	Days	Avg Hrs/Day	Cumulative Total For		Cumulative
				Hours	Days	
09/30/09	120.00	0	0	120.00	0	
10/31/09	133.75	0	0	253.75	0	
11/25/09	90.00	0	0	343.75	0	
12/30/09	90.00	0	0	433.75	0	
01/29/10	102.06	0	0	535.81	0	
02/28/10	114.78	0	0	650.59	0	
03/31/10	118.59	0	0	769.18	0	
04/30/10	134.64	0	0	903.82	0	
05/13/10	45.15	0	0	948.97	0	
05/28/10	56.68	0	0	1005.65	0	
06/30/10	103.06	0	0	1108.71	0	
07/31/10	87.01	0	0	1195.72	0	
08/31/10	54.63	0	0	1250.35	0	
08/31/10	52.90	0	0	1303.25	0	
09/17/10	52.11	0	0	1355.36	0	
06/30/11	5.15	0	0	1360.51	0	

Cumulative Data As of 05/29/12 For:

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

Permit: 8140

STATISTICS:

Crs: COS Crs Hrs: 1500.0
 Total Hrs: 1360.51
 Transfer Hrs : 0.00
 GrandTot Hrs: 1360.51
 Remaining Hrs: 139.49
 % Complete: 90.7007

Lowest Hrs/Month: 5.15
 Highest Hrs/Month: 134.64
 SSN:
 Active?: Yes
 SAP?: Yes
 GPA: 88.16
 Attn ID#: 8140

DATES:

Start: 09/01/09 Determined: / /
 Drop: / / Cntrct Grad: 10/01/10
 ReEnroll: / / ProjGrad: 12/29/11
 Drop2: / / Graduate: / /
 ReEnroll12: / / LOA: / / - / /
 Drop3: / / Loan Ent / /
 ReEnroll13: / / Loan Exit / /

AMA: 107.85 Over Contract? YES!!!

At This Attendance Rate You may Pay 15894.30 For Poor Attendance Before You Graduate

STUDENT ATTENDANCE HISTORY

Printed on: 06/07/2012 01:00:32 PM

From Date: / /

To Date: **06/07/2012**

Student Name: (b)(6); (b)(7)(C); (b)(7)(C)

Permit #: **6634**

Course Name: **COSMETOLOGY MILADYS/Pvt Pnt** Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
09/15/2010	09/15/2010	9.980	1	9.980	1	Attended
09/16/2010	09/16/2010	11.500	1	21.480	2	Attended
09/17/2010	09/17/2010	12.000	1	33.480	3	Attended
09/18/2010	09/18/2010	9.980	1	43.460	4	Attended
09/21/2010	09/21/2010	11.500	1	54.960	5	Attended
09/22/2010	09/22/2010	9.980	1	64.940	6	Attended
09/23/2010	09/23/2010	9.980	1	74.920	7	Attended
09/24/2010	09/24/2010	11.500	1	86.420	8	Attended
09/25/2010	09/25/2010	9.980	1	96.400	9	Attended
09/26/2010	09/26/2010	12.000	1	108.400	10	Attended
09/28/2010	09/28/2010	11.500	1	119.900	11	Attended
09/29/2010	09/29/2010	9.980	1	129.880	12	Attended
10/05/2010	10/05/2010	11.500	1	141.380	13	Attended
10/06/2010	10/06/2010	9.980	1	151.360	14	Attended
10/07/2010	10/07/2010	11.500	1	162.860	15	Attended
10/08/2010	10/08/2010	9.980	1	172.840	16	Attended
10/09/2010	10/09/2010	12.000	1	184.840	17	Attended
10/10/2010	10/10/2010	12.000	1	196.840	18	Attended
10/12/2010	10/12/2010	9.980	1	206.820	19	Attended
10/13/2010	10/13/2010	9.980	1	216.800	20	Attended
10/14/2010	10/14/2010	9.980	1	226.780	21	Attended
10/15/2010	10/15/2010	9.980	1	236.760	22	Attended
10/16/2010	10/16/2010	12.000	1	248.760	23	Attended
10/17/2010	10/17/2010	12.000	1	260.760	24	Attended
10/19/2010	10/19/2010	9.980	1	270.740	25	Attended
10/20/2010	10/20/2010	9.980	1	280.720	26	Attended
10/21/2010	10/21/2010	9.980	1	290.700	27	Attended
10/22/2010	10/22/2010	9.980	1	300.680	28	Attended
10/25/2010	10/25/2010	12.000	1	312.680	29	Attended
10/26/2010	10/26/2010	9.980	1	322.660	30	Attended
10/27/2010	10/27/2010	9.980	1	332.640	31	Attended
10/28/2010	10/28/2010	9.980	1	342.620	32	Attended
10/29/2010	10/29/2010	9.980	1	352.600	33	Attended
11/02/2010	11/02/2010	9.980	1	362.580	34	Attended
11/03/2010	11/03/2010	9.980	1	372.560	35	Attended
11/05/2010	11/05/2010	9.980	1	382.540	36	Attended
11/07/2010	11/07/2010	12.000	1	394.540	37	Attended
11/17/2010	11/17/2010	9.980	1	404.520	38	Attended
11/19/2010	11/19/2010	9.980	1	414.500	39	Attended
11/24/2010	11/24/2010	9.980	1	424.480	40	Attended
11/26/2010	11/26/2010	11.500	1	435.980	41	Attended
12/01/2010	12/01/2010	9.980	1	445.960	42	Attended
12/03/2010	12/03/2010	9.980	1	455.940	43	Attended

STUDENT ATTENDANCE HISTORY

Printed on: 06/07/2012 01:00:32 PM

From Date: / /

To Date: **06/07/2012**

Student Name: (b)(6); (b)(7)(C); (b)(7)(C)

Permit #: 5534

Course Name: **COSMETOLOGY MILADYS/Pvt Pnt** Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
12/08/2010	12/08/2010	9.980	1	465.920	44	Attended
12/10/2010	12/10/2010	11.500	1	477.420	45	Attended
12/11/2010	12/11/2010	12.000	1	489.420	46	Attended
12/12/2010	12/12/2010	11.500	1	500.920	47	Attended
12/21/2010	12/21/2010	9.980	1	510.900	48	Attended
12/22/2010	12/22/2010	12.000	1	522.900	49	Attended
12/23/2010	12/23/2010	12.000	1	534.900	50	Attended
12/28/2010	12/28/2010	12.000	1	546.900	51	Attended
12/29/2010	12/29/2010	12.000	1	558.900	52	Attended
12/30/2010	12/30/2010	12.000	1	570.900	53	Attended
01/04/2011	01/04/2011	11.500	1	582.400	54	Attended
01/05/2011	01/05/2011	9.980	1	592.380	55	Attended
01/06/2011	01/06/2011	11.500	1	603.880	56	Attended
01/07/2011	01/07/2011	12.000	1	615.880	57	Attended
01/08/2011	01/08/2011	11.500	1	627.380	58	Attended
01/11/2011	01/11/2011	12.000	1	639.380	59	Attended
01/12/2011	01/12/2011	11.500	1	650.880	60	Attended
01/13/2011	01/13/2011	12.000	1	662.880	61	Attended
01/14/2011	01/14/2011	11.500	1	674.380	62	Attended
01/15/2011	01/15/2011	9.980	1	684.360	63	Attended
01/18/2011	01/18/2011	11.500	1	695.860	64	Attended
01/19/2011	01/19/2011	9.980	1	705.840	65	Attended
01/20/2011	01/20/2011	11.500	1	717.340	66	Attended
01/21/2011	01/21/2011	9.980	1	727.320	67	Attended
01/22/2011	01/22/2011	12.000	1	739.320	68	Attended
01/23/2011	01/23/2011	11.500	1	750.820	69	Attended
01/24/2011	01/24/2011	9.980	1	760.800	70	Attended
01/25/2011	01/25/2011	11.500	1	772.300	71	Attended
01/26/2011	01/26/2011	9.980	1	782.280	72	Attended
01/28/2011	01/28/2011	1.000	1	783.280	73	Attended
02/01/2011	02/01/2011	9.980	1	793.260	74	Attended
02/03/2011	02/03/2011	11.500	1	804.760	75	Attended
02/04/2011	02/04/2011	9.980	1	814.740	76	Attended
02/05/2011	02/05/2011	11.500	1	826.240	77	Attended
02/08/2011	02/08/2011	9.980	1	836.220	78	Attended
02/09/2011	02/09/2011	11.500	1	847.720	79	Attended
02/10/2011	02/10/2011	12.000	1	859.720	80	Attended
02/11/2011	02/11/2011	11.500	1	871.220	81	Attended
02/12/2011	02/12/2011	12.000	1	883.220	82	Attended
02/16/2011	02/16/2011	11.500	1	894.720	83	Attended
02/17/2011	02/17/2011	12.000	1	906.720	84	Attended
02/18/2011	02/18/2011	11.500	1	918.220	85	Attended
02/19/2011	02/19/2011	11.500	1	929.720	86	Attended

STUDENT ATTENDANCE HISTORY

Printed on: 06/07/2012 01:00:32 PM

From Date: / /

To Date: **06/07/2012**

Student Name: (b)(6); (b)(7)(C); (b)(7)(C)

Permit #: **6634**

Course Name: **COSMETOLOGY MILADYS/Pvt Pnt** Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
02/22/2011	02/22/2011	9.980	1	939.700	87	Attended
02/23/2011	02/23/2011	11.500	1	951.200	88	Attended
02/24/2011	02/24/2011	1.570	1	952.770	89	Attended
02/25/2011	02/25/2011	11.500	1	964.270	90	Attended
02/26/2011	02/26/2011	0.000	0	964.270	90	Absent
03/10/2011	03/10/2011	9.980	1	974.250	91	Attended
03/12/2011	03/12/2011	7.000	1	981.250	92	Attended
03/15/2011	03/15/2011	7.500	1	988.750	93	Attended
03/22/2011	03/22/2011	7.500	1	996.250	94	Attended
03/24/2011	03/24/2011	7.500	1	1003.750	95	Attended
03/26/2011	03/26/2011	4.720	1	1008.470	96	Attended
03/31/2011	03/31/2011	7.500	1	1015.970	97	Attended
04/02/2011	04/02/2011	7.370	1	1023.340	98	Attended
04/03/2011	04/03/2011	9.980	1	1033.320	99	Attended
04/12/2011	04/12/2011	4.320	1	1037.640	100	Attended
04/13/2011	04/13/2011	9.980	1	1047.620	101	Attended
04/14/2011	04/14/2011	7.500	1	1055.120	102	Attended
04/15/2011	04/15/2011	9.980	1	1065.100	103	Attended
04/16/2011	04/16/2011	7.030	1	1072.130	104	Attended
04/19/2011	04/19/2011	7.500	1	1079.630	105	Attended
04/21/2011	04/21/2011	7.500	1	1087.130	106	Attended
04/23/2011	04/23/2011	4.730	1	1091.860	107	Attended
04/24/2011	04/24/2011	9.980	1	1101.840	108	Attended
04/26/2011	04/26/2011	4.200	1	1106.040	109	Attended
04/28/2011	04/28/2011	7.500	1	1113.540	110	Attended
04/30/2011	04/30/2011	8.050	1	1121.590	111	Attended
05/03/2011	05/03/2011	7.500	1	1129.090	112	Attended
05/05/2011	05/05/2011	7.500	1	1136.590	113	Attended
05/07/2011	05/07/2011	6.920	1	1143.510	114	Attended
05/10/2011	05/10/2011	7.500	1	1151.010	115	Attended
05/12/2011	05/12/2011	7.500	1	1158.510	116	Attended
05/14/2011	05/14/2011	7.350	1	1165.860	117	Attended
05/17/2011	05/17/2011	0.000	0	1165.860	117	Absent
05/19/2011	05/19/2011	7.500	1	1173.360	118	Attended
05/21/2011	05/21/2011	6.100	1	1179.460	119	Attended
05/24/2011	05/24/2011	7.500	1	1186.960	120	Attended
05/26/2011	05/26/2011	0.000	0	1186.960	120	Absent
05/31/2011	05/31/2011	4.620	1	1191.580	121	Attended
06/02/2011	06/02/2011	3.820	1	1195.400	122	Attended
06/04/2011	06/04/2011	7.330	1	1202.730	123	Attended
06/07/2011	06/07/2011	3.820	1	1206.550	124	Attended
06/09/2011	06/09/2011	4.400	1	1210.950	125	Attended
06/11/2011	06/11/2011	6.700	1	1217.650	126	Attended

STUDENT ATTENDANCE HISTORY

Printed on: 06/07/2012 01:00:32 PM

From Date: / /

To Date: **06/07/2012**

Student Name: (b)(6); (b)(7)(C); (b)(7)(C)

Permit #: **6634**

Course Name: **COSMETOLOGY MILADYS/Pvt Pnt** Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
06/14/2011	06/14/2011	4.150	1	1221.800	127	Attended
06/16/2011	06/16/2011	4.300	1	1226.100	128	Attended
06/18/2011	06/18/2011	7.770	1	1233.870	129	Attended
06/21/2011	06/21/2011	3.770	1	1237.640	130	Attended
06/23/2011	06/23/2011	4.020	1	1241.660	131	Attended
06/25/2011	06/25/2011	5.170	1	1246.830	132	Attended
06/28/2011	06/28/2011	3.520	1	1250.350	133	Attended
06/30/2011	06/30/2011	0.000	0	1250.350	133	Absent
07/07/2011	07/07/2011	0.000	0	1250.350	133	Absent
07/09/2011	07/09/2011	7.600	1	1257.950	134	Attended
07/12/2011	07/12/2011	0.000	0	1257.950	134	Absent
07/14/2011	07/14/2011	3.930	1	1261.880	135	Attended
07/16/2011	07/16/2011	7.770	1	1269.650	136	Attended
07/19/2011	07/19/2011	4.000	1	1273.650	137	Attended
07/21/2011	07/21/2011	8.410	1	1282.060	138	Attended
07/23/2011	07/23/2011	6.610	1	1288.670	139	Attended
07/26/2011	07/26/2011	3.250	1	1291.920	140	Attended
07/28/2011	07/28/2011	3.970	1	1295.890	141	Attended
07/30/2011	07/30/2011	6.750	1	1302.640	142	Attended
08/02/2011	08/02/2011	3.470	1	1306.110	143	Attended
08/04/2011	08/04/2011	0.000	0	1306.110	143	Absent
08/06/2011	08/06/2011	6.370	1	1312.480	144	Attended
08/09/2011	08/09/2011	8.400	1	1320.880	145	Attended
08/10/2011	08/10/2011	7.650	1	1328.530	146	Attended
08/11/2011	08/11/2011	10.970	1	1339.500	147	Attended
08/12/2011	08/12/2011	7.700	1	1347.200	148	Attended
08/13/2011	08/13/2011	7.820	1	1355.020	149	Attended
08/16/2011	08/16/2011	11.340	1	1366.360	150	Attended
08/17/2011	08/17/2011	7.330	1	1373.690	151	Attended
08/18/2011	08/18/2011	8.880	1	1382.570	152	Attended
08/19/2011	08/19/2011	4.800	1	1387.370	153	Attended
08/20/2011	08/20/2011	7.330	1	1394.700	154	Attended
08/23/2011	08/23/2011	11.270	1	1405.970	155	Attended
08/24/2011	08/24/2011	7.700	1	1413.670	156	Attended
08/25/2011	08/25/2011	7.070	1	1420.740	157	Attended
08/26/2011	08/26/2011	7.920	1	1428.660	158	Attended
08/27/2011	08/27/2011	6.970	1	1435.630	159	Attended
08/30/2011	08/30/2011	11.050	1	1446.680	160	Attended
08/31/2011	08/31/2011	7.060	1	1453.740	161	Attended
09/01/2011	09/01/2011	10.670	1	1464.410	162	Attended
09/02/2011	09/02/2011	6.680	1	1471.090	163	Attended
09/13/2011	09/13/2011	11.340	1	1482.430	164	Attended
09/14/2011	09/14/2011	7.000	1	1489.430	165	Attended

STUDENT ATTENDANCE HISTORY

Printed on: 06/07/2012 01:00:32 PM

From Date: / /

To Date: 06/07/2012

Student Name: (b)(6); (b)(7)(C), (b)(7)(C)

Permit #: 6634

Course Name: COSMETOLOGY MILADYS/Pvt Pnt Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
09/15/2011	09/15/2011	9.920	1	1499.350	166	Attended
09/16/2011	09/16/2011	6.100	1	1505.450	167	Attended
Student Totals				1505.450	167	Hours To Date: 1505.450

STUDENT ATTENDANCE HISTORY

Printed on: 06/06/2012 01:29:19 PM

From Date: 07/01/2011

To Date: 06/06/2012

Student Name: (b)(6); (b)(7)(C); (b)(7)(C)

Permit #: 6634

Course Name: COSMETOLOGY MILADYS/Pvt Pnt Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
07/07/2011	07/07/2011	0.000	0	0.000	0	Absent
07/09/2011	07/09/2011	7.600	1	7.600	1	Attended
07/12/2011	07/12/2011	0.000	0	7.600	1	Absent
07/14/2011	07/14/2011	3.930	1	11.530	2	Attended
07/16/2011	07/16/2011	7.770	1	19.300	3	Attended
07/19/2011	07/19/2011	4.000	1	23.300	4	Attended
07/21/2011	07/21/2011	8.410	1	31.710	5	Attended
07/23/2011	07/23/2011	6.610	1	38.320	6	Attended
07/26/2011	07/26/2011	3.250	1	41.570	7	Attended
07/28/2011	07/28/2011	3.970	1	45.540	8	Attended
07/30/2011	07/30/2011	6.750	1	52.290	9	Attended
08/02/2011	08/02/2011	3.470	1	55.760	10	Attended
08/04/2011	08/04/2011	0.000	0	55.760	10	Absent
08/06/2011	08/06/2011	6.370	1	62.130	11	Attended
08/09/2011	08/09/2011	8.400	1	70.530	12	Attended
08/10/2011	08/10/2011	7.650	1	78.180	13	Attended
08/11/2011	08/11/2011	10.970	1	89.150	14	Attended
08/12/2011	08/12/2011	7.700	1	96.850	15	Attended
08/13/2011	08/13/2011	7.820	1	104.670	16	Attended
08/16/2011	08/16/2011	11.340	1	116.010	17	Attended
08/17/2011	08/17/2011	7.330	1	123.340	18	Attended
08/18/2011	08/18/2011	8.880	1	132.220	19	Attended
08/19/2011	08/19/2011	4.800	1	137.020	20	Attended
08/20/2011	08/20/2011	7.330	1	144.350	21	Attended
08/23/2011	08/23/2011	11.270	1	155.620	22	Attended
08/24/2011	08/24/2011	7.700	1	163.320	23	Attended
08/25/2011	08/25/2011	7.070	1	170.390	24	Attended
08/26/2011	08/26/2011	7.920	1	178.310	25	Attended
08/27/2011	08/27/2011	6.970	1	185.280	26	Attended
08/30/2011	08/30/2011	11.050	1	196.330	27	Attended
08/31/2011	08/31/2011	7.060	1	203.390	28	Attended
09/01/2011	09/01/2011	10.670	1	214.060	29	Attended
09/02/2011	09/02/2011	6.680	1	220.740	30	Attended
09/13/2011	09/13/2011	11.340	1	232.080	31	Attended
09/14/2011	09/14/2011	7.000	1	239.080	32	Attended
09/15/2011	09/15/2011	9.920	1	249.000	33	Attended
09/16/2011	09/16/2011	6.100	1	255.100	34	Attended

Student Totals 255.100 34 Hours To Date: 1505.450

STUDENT ATTENDANCE HISTORY

Printed on: 06/07/2012 01:10:34 PM

From Date: / /

To Date: **06/07/2012**

Student Name: (b)(6); (b)(7)(C); (b)(7)(C)

Permit #: **9135**

Course Name: **COSMETOLOGY MILADYS/Pvt Pnt** Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
12/15/2010	12/31/2010	35.000	16	35.000	16	Attended
01/01/2011	01/31/2011	40.290	31	75.290	47	Attended
02/01/2011	02/28/2011	71.050	28	146.340	75	Attended
03/01/2011	03/01/2011	7.070	1	153.410	76	Attended
03/02/2011	03/02/2011	4.840	1	158.250	77	Attended
03/03/2011	03/03/2011	5.250	1	163.500	78	Attended
03/04/2011	03/04/2011	4.480	1	167.980	79	Attended
03/10/2011	03/10/2011	4.370	1	172.350	80	Attended
03/11/2011	03/11/2011	4.650	1	177.000	81	Attended
03/15/2011	03/15/2011	4.950	1	181.950	82	Attended
03/16/2011	03/16/2011	4.260	1	186.210	83	Attended
03/17/2011	03/17/2011	4.950	1	191.160	84	Attended
03/22/2011	03/22/2011	6.950	1	198.110	85	Attended
03/23/2011	03/23/2011	6.870	1	204.980	86	Attended
03/24/2011	03/24/2011	6.790	1	211.770	87	Attended
03/25/2011	03/25/2011	6.390	1	218.160	88	Attended
03/29/2011	03/29/2011	5.100	1	223.260	89	Attended
03/30/2011	03/30/2011	5.000	1	228.260	90	Attended
04/01/2011	04/01/2011	5.020	1	233.280	91	Attended
04/05/2011	04/05/2011	5.230	1	238.510	92	Attended
04/06/2011	04/06/2011	4.920	1	243.430	93	Attended
04/07/2011	04/07/2011	4.220	1	247.650	94	Attended
04/08/2011	04/08/2011	2.990	1	250.640	95	Attended
04/12/2011	04/12/2011	5.170	1	255.810	96	Attended
04/13/2011	04/13/2011	3.220	1	259.030	97	Attended
04/14/2011	04/14/2011	5.070	1	264.100	98	Attended
04/15/2011	04/15/2011	4.450	1	268.550	99	Attended
04/20/2011	04/20/2011	5.130	1	273.680	100	Attended
04/21/2011	04/21/2011	5.230	1	278.910	101	Attended
04/22/2011	04/22/2011	6.410	1	285.320	102	Attended
04/26/2011	04/26/2011	5.230	1	290.550	103	Attended
04/27/2011	04/27/2011	5.320	1	295.870	104	Attended
04/28/2011	04/28/2011	5.130	1	301.000	105	Attended
05/03/2011	05/03/2011	6.020	1	307.020	106	Attended
05/04/2011	05/04/2011	5.330	1	312.350	107	Attended
05/05/2011	05/05/2011	5.080	1	317.430	108	Attended
05/06/2011	05/06/2011	5.230	1	322.660	109	Attended
05/10/2011	05/10/2011	4.920	1	327.580	110	Attended
05/11/2011	05/11/2011	4.550	1	332.130	111	Attended
05/12/2011	05/12/2011	0.000	0	332.130	111	Absent
05/13/2011	05/13/2011	0.000	0	332.130	111	Absent

Student Totals 332.130 111 Hours To Date: 332.130

STUDENT ATTENDANCE HISTORY

Printed on: 06/25/2012 04:13:00 PM

From Date: / /

To Date: 06/30/2011

Student Name: (b)(6); (b)(7)(C); (b)(7)(C)

Permit #: 7096

Course Name: COSMETOLOGY MILADYS/Pvt Pnt Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
06/21/2011	06/21/2011	0.000	0	885.060	129	Absent
06/22/2011	06/22/2011	7.600	1	892.660	130	Attended
06/23/2011	06/23/2011	7.820	1	900.480	131	Attended
06/24/2011	06/24/2011	3.820	1	904.300	132	Attended
06/28/2011	06/28/2011	6.730	1	911.030	133	Attended
06/29/2011	06/29/2011	8.080	1	919.110	134	Attended
06/30/2011	06/30/2011	8.310	1	927.420	135	Attended
Student Totals				927.420	135	Hours - Total: 927.420

STUDENT ATTENDANCE HISTORY

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From Date: / /

To Date: 06/30/2011

Student Name: (b)(6); (b)(7)(C); (b)(7)(C)

Permit #: 9201

Course Name: COSMETOLOGY MILADYS/Pvt Pnt Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
04/08/2011	04/08/2011	7.170	1	1243.820	130	Attended
04/09/2011	04/09/2011	7.020	1	1250.840	131	Attended
04/12/2011	04/12/2011	7.930	1	1258.770	132	Attended
04/13/2011	04/13/2011	7.140	1	1265.910	133	Attended
04/14/2011	04/14/2011	7.490	1	1273.400	134	Attended
04/15/2011	04/15/2011	4.110	1	1277.510	135	Attended
04/19/2011	04/19/2011	4.810	1	1282.320	136	Attended
04/20/2011	04/20/2011	7.750	1	1290.070	137	Attended
04/21/2011	04/21/2011	3.350	1	1293.420	138	Attended
04/22/2011	04/22/2011	7.160	1	1300.580	139	Attended
04/23/2011	04/23/2011	6.950	1	1307.530	140	Attended
04/26/2011	04/26/2011	7.530	1	1315.060	141	Attended
04/27/2011	04/27/2011	6.320	1	1321.380	142	Attended
04/28/2011	04/28/2011	7.500	1	1328.880	143	Attended
04/29/2011	04/29/2011	7.380	1	1336.260	144	Attended
04/30/2011	04/30/2011	7.720	1	1343.980	145	Attended
05/03/2011	05/03/2011	0.000	1	1343.980	146	Excused
05/04/2011	05/04/2011	0.000	1	1343.980	147	Excused
05/05/2011	05/05/2011	0.000	1	1343.980	148	Excused
05/06/2011	05/06/2011	0.000	1	1343.980	149	Excused
05/10/2011	05/10/2011	7.490	1	1351.470	150	Attended
05/11/2011	05/11/2011	7.530	1	1359.000	151	Attended
05/12/2011	05/12/2011	7.580	1	1366.580	152	Attended
05/13/2011	05/13/2011	7.360	1	1373.940	153	Attended
05/14/2011	05/14/2011	7.350	1	1381.290	154	Attended
05/16/2011	05/16/2011	2.150	1	1383.440	155	Attended
05/17/2011	05/17/2011	8.050	1	1391.490	156	Attended
05/18/2011	05/18/2011	7.900	1	1399.390	157	Attended
05/19/2011	05/19/2011	7.530	1	1406.920	158	Attended
05/20/2011	05/20/2011	7.470	1	1414.390	159	Attended
05/21/2011	05/21/2011	7.100	1	1421.490	160	Attended
05/24/2011	05/24/2011	7.620	1	1429.110	161	Attended
05/25/2011	05/25/2011	7.250	1	1436.360	162	Attended
05/26/2011	05/26/2011	7.570	1	1443.930	163	Attended
05/27/2011	05/27/2011	7.780	1	1451.710	164	Attended
05/31/2011	05/31/2011	7.670	1	1459.380	165	Attended
06/01/2011	06/01/2011	7.880	1	1467.260	166	Attended
06/02/2011	06/02/2011	7.470	1	1474.730	167	Attended
06/03/2011	06/03/2011	8.230	1	1482.960	168	Attended
06/04/2011	06/04/2011	7.570	1	1490.530	169	Attended
06/07/2011	06/07/2011	7.990	1	1498.520	170	Attended
06/08/2011	06/08/2011	8.550	1	1507.070	171	Attended
06/09/2011	06/09/2011	4.620	1	1511.690	172	Attended

STUDENT ATTENDANCE HISTORY

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From Date: / /

To Date: 06/30/2011

Student Name: (b)(6); (b)(7)(C);(b)(7)(C)

Permit #: 9201

Course Name: COSMETOLOGY MILADYS/Pvt Pnt Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
02/01/2011	02/01/2011	12.000	1	844.000	87	Attended
02/03/2011	02/03/2011	12.000	1	856.000	88	Attended
02/05/2011	02/05/2011	12.000	1	868.000	89	Attended
02/06/2011	02/06/2011	12.000	1	880.000	90	Attended
02/07/2011	02/07/2011	12.000	1	892.000	91	Attended
02/09/2011	02/09/2011	12.000	1	904.000	92	Attended
02/10/2011	02/10/2011	12.000	1	916.000	93	Attended
02/11/2011	02/11/2011	12.000	1	928.000	94	Attended
02/12/2011	02/12/2011	12.000	1	940.000	95	Attended
02/13/2011	02/13/2011	12.000	1	952.000	96	Attended
02/14/2011	02/14/2011	12.000	1	964.000	97	Attended
02/17/2011	02/17/2011	12.000	1	976.000	98	Attended
02/19/2011	02/19/2011	12.000	1	988.000	99	Attended
02/20/2011	02/20/2011	12.000	1	1000.000	100	Attended
02/21/2011	02/21/2011	12.000	1	1012.000	101	Attended
02/24/2011	02/24/2011	12.000	1	1024.000	102	Attended
02/26/2011	02/26/2011	12.000	1	1036.000	103	Attended
02/27/2011	02/27/2011	12.000	1	1048.000	104	Attended
02/28/2011	02/28/2011	12.000	1	1060.000	105	Attended
03/01/2011	03/01/2011	7.610	1	1067.610	106	Attended
03/02/2011	03/02/2011	6.070	1	1073.680	107	Attended
03/03/2011	03/03/2011	7.650	1	1081.330	108	Attended
03/04/2011	03/04/2011	6.410	1	1087.740	109	Attended
03/08/2011	03/08/2011	7.150	1	1094.890	110	Attended
03/09/2011	03/09/2011	6.610	1	1101.500	111	Attended
03/10/2011	03/10/2011	7.960	1	1109.460	112	Attended
03/11/2011	03/11/2011	7.630	1	1117.090	113	Attended
03/12/2011	03/12/2011	8.100	1	1125.190	114	Attended
03/15/2011	03/15/2011	3.670	1	1128.860	115	Attended
03/16/2011	03/16/2011	7.350	1	1136.210	116	Attended
03/17/2011	03/17/2011	7.890	1	1144.100	117	Attended
03/18/2011	03/18/2011	8.120	1	1152.220	118	Attended
03/19/2011	03/19/2011	8.480	1	1160.700	119	Attended
03/22/2011	03/22/2011	7.830	1	1168.530	120	Attended
03/23/2011	03/23/2011	7.230	1	1175.760	121	Attended
03/24/2011	03/24/2011	7.380	1	1183.140	122	Attended
03/25/2011	03/25/2011	8.450	1	1191.590	123	Attended
03/29/2011	03/29/2011	8.350	1	1199.940	124	Attended
03/30/2011	03/30/2011	7.000	1	1206.940	125	Attended
03/31/2011	03/31/2011	6.550	1	1213.490	126	Attended
04/02/2011	04/02/2011	8.020	1	1221.510	127	Attended
04/05/2011	04/05/2011	7.600	1	1229.110	128	Attended
04/06/2011	04/06/2011	7.540	1	1236.650	129	Attended

STUDENT ATTENDANCE HISTORY

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From Date: / /

To Date: 06/30/2011

Student Name: (b)(6); (b)(7)(C); (b)(7)(C)

Permit #: 9201

Course Name: COSMETOLOGY MILADYS/Pvt Pnt Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
10/05/2010	10/05/2010	6.000	1	432.000	44	Attended
10/06/2010	10/06/2010	6.000	1	438.000	45	Attended
10/07/2010	10/07/2010	6.000	1	444.000	46	Attended
10/08/2010	10/08/2010	6.000	1	450.000	47	Attended
10/09/2010	10/09/2010	6.000	1	456.000	48	Attended
10/12/2010	10/12/2010	6.000	1	462.000	49	Attended
10/13/2010	10/13/2010	6.000	1	468.000	50	Attended
10/14/2010	10/14/2010	6.000	1	474.000	51	Attended
10/15/2010	10/15/2010	6.000	1	480.000	52	Attended
10/16/2010	10/16/2010	6.000	1	486.000	53	Attended
10/19/2010	10/19/2010	6.000	1	492.000	54	Attended
10/20/2010	10/20/2010	6.000	1	498.000	55	Attended
10/21/2010	10/21/2010	6.000	1	504.000	56	Attended
10/22/2010	10/22/2010	6.000	1	510.000	57	Attended
10/23/2010	10/23/2010	6.000	1	516.000	58	Attended
10/24/2010	10/24/2010	6.000	1	522.000	59	Attended
10/25/2010	10/25/2010	6.000	1	528.000	60	Attended
11/06/2010	11/06/2010	12.000	1	540.000	61	Attended
11/16/2010	11/16/2010	6.000	1	546.000	62	Attended
01/02/2011	01/02/2011	12.000	1	558.000	63	Attended
01/03/2011	01/03/2011	12.000	1	570.000	64	Attended
01/04/2011	01/04/2011	12.000	1	582.000	65	Attended
01/05/2011	01/05/2011	12.000	1	594.000	66	Attended
01/06/2011	01/06/2011	12.000	1	606.000	67	Attended
01/07/2011	01/07/2011	12.000	1	618.000	68	Attended
01/08/2011	01/08/2011	12.000	1	630.000	69	Attended
01/13/2011	01/13/2011	12.000	1	642.000	70	Attended
01/14/2011	01/14/2011	12.000	1	654.000	71	Attended
01/15/2011	01/15/2011	12.000	1	666.000	72	Attended
01/16/2011	01/16/2011	12.000	1	678.000	73	Attended
01/17/2011	01/17/2011	12.000	1	690.000	74	Attended
01/18/2011	01/18/2011	12.000	1	702.000	75	Attended
01/19/2011	01/19/2011	12.000	1	714.000	76	Attended
01/20/2011	01/20/2011	12.000	1	726.000	77	Attended
01/21/2011	01/21/2011	12.000	1	738.000	78	Attended
01/23/2011	01/23/2011	12.000	1	750.000	79	Attended
01/24/2011	01/24/2011	12.000	1	762.000	80	Attended
01/25/2011	01/25/2011	12.000	1	774.000	81	Attended
01/26/2011	01/26/2011	10.000	1	784.000	82	Attended
01/27/2011	01/27/2011	12.000	1	796.000	83	Attended
01/28/2011	01/28/2011	12.000	1	808.000	84	Attended
01/29/2011	01/29/2011	12.000	1	820.000	85	Attended
01/30/2011	01/30/2011	12.000	1	832.000	86	Attended

STUDENT ATTENDANCE HISTORY

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From Date: / /

To Date: 06/30/2011

Student Name: (b)(6); (b)(7)(C);(b)(7)(C)

Permit #: 9201

Course Name: COSMETOLOGY MILADYS/Pvt Pnt Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
07/04/2010	07/04/2010	12.000	1	12.000	1	Attended
07/13/2010	07/13/2010	12.000	1	24.000	2	Attended
07/15/2010	07/15/2010	12.000	1	36.000	3	Attended
07/16/2010	07/16/2010	12.000	1	48.000	4	Attended
07/17/2010	07/17/2010	12.000	1	60.000	5	Attended
07/18/2010	07/18/2010	12.000	1	72.000	6	Attended
07/20/2010	07/20/2010	12.000	1	84.000	7	Attended
07/21/2010	07/21/2010	12.000	1	96.000	8	Attended
07/22/2010	07/22/2010	12.000	1	108.000	9	Attended
07/23/2010	07/23/2010	12.000	1	120.000	10	Attended
07/27/2010	07/27/2010	12.000	1	132.000	11	Attended
07/28/2010	07/28/2010	12.000	1	144.000	12	Attended
07/29/2010	07/29/2010	12.000	1	156.000	13	Attended
07/30/2010	07/30/2010	12.000	1	168.000	14	Attended
08/03/2010	08/03/2010	12.000	1	180.000	15	Attended
08/05/2010	08/05/2010	12.000	1	192.000	16	Attended
08/06/2010	08/06/2010	12.000	1	204.000	17	Attended
08/10/2010	08/10/2010	12.000	1	216.000	18	Attended
08/11/2010	08/11/2010	12.000	1	228.000	19	Attended
08/12/2010	08/12/2010	12.000	1	240.000	20	Attended
08/13/2010	08/13/2010	12.000	1	252.000	21	Attended
08/14/2010	08/14/2010	6.000	1	258.000	22	Attended
08/17/2010	08/17/2010	6.000	1	264.000	23	Attended
08/18/2010	08/18/2010	12.000	1	276.000	24	Attended
08/19/2010	08/19/2010	6.000	1	282.000	25	Attended
08/20/2010	08/20/2010	6.000	1	288.000	26	Attended
08/24/2010	08/24/2010	6.000	1	294.000	27	Attended
08/25/2010	08/25/2010	12.000	1	306.000	28	Attended
08/26/2010	08/26/2010	6.000	1	312.000	29	Attended
08/27/2010	08/27/2010	6.000	1	318.000	30	Attended
08/28/2010	08/28/2010	6.000	1	324.000	31	Attended
09/14/2010	09/14/2010	12.000	1	336.000	32	Attended
09/15/2010	09/15/2010	12.000	1	348.000	33	Attended
09/16/2010	09/16/2010	12.000	1	360.000	34	Attended
09/17/2010	09/17/2010	12.000	1	372.000	35	Attended
09/21/2010	09/21/2010	6.000	1	378.000	36	Attended
09/22/2010	09/22/2010	6.000	1	384.000	37	Attended
09/23/2010	09/23/2010	12.000	1	396.000	38	Attended
09/24/2010	09/24/2010	6.000	1	402.000	39	Attended
09/25/2010	09/25/2010	6.000	1	408.000	40	Attended
09/28/2010	09/28/2010	6.000	1	414.000	41	Attended
09/29/2010	09/29/2010	6.000	1	420.000	42	Attended
10/01/2010	10/01/2010	6.000	1	426.000	43	Attended

STUDENT ATTENDANCE HISTORY

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From Date: / /

To Date: 06/30/2011

Student Name: (b)(6); (b)(7)(C), (b)(7)(C)

Permit #: 3850

Course Name: COSMETOLOGY MILADYS/Pvt Pnt Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
07/01/2010	07/31/2010	40.670	4	40.670	4	Attended
08/01/2010	08/31/2010	27.340	3	68.010	7	Attended
09/01/2010	09/30/2010	65.860	6	133.870	13	Attended
Student Totals				133.870	13	Hours To Date: 133.870

STUDENT ATTENDANCE HISTORY

Printed on: 06/08/2012 11:28:14 AM

From Date: / /

To Date: 06/08/2012

Student Name: (b)(6); (b)(7)(C),(b)(7)(C)

Permit #: 0000

Course Name: COSMETOLOGY MILADYS/Pvt Pnt Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
11/01/2009	11/30/2009	90.000	8	90.000	8	Attended
12/01/2009	12/31/2009	90.000	8	180.000	16	Attended
01/01/2010	01/27/2010	103.210	9	283.210	25	Attended
02/02/2010	02/02/2010	11.670	1	294.880	26	Attended
02/03/2010	02/03/2010	12.000	1	306.880	27	Attended
02/04/2010	02/04/2010	12.000	1	318.880	28	Attended
02/05/2010	02/05/2010	12.000	1	330.880	29	Attended
02/06/2010	02/06/2010	12.000	1	342.880	30	Attended
02/09/2010	02/09/2010	12.000	1	354.880	31	Attended
02/10/2010	02/10/2010	10.000	1	364.880	32	Attended
02/28/2010	02/28/2010	7.780	1	372.660	33	Attended
03/01/2010	03/31/2010	130.580	11	503.240	44	Attended
04/01/2010	04/30/2010	87.190	8	590.430	52	Attended
05/01/2010	05/13/2010	47.430	4	637.860	56	Attended
05/01/2010	05/28/2010	73.380	7	711.240	63	Attended
06/01/2010	06/30/2010	122.210	11	833.450	74	Attended
07/01/2010	07/31/2010	89.510	8	922.960	82	Attended
08/01/2010	08/31/2010	138.810	12	1061.770	94	Attended
09/01/2010	09/30/2010	134.580	12	1196.350	106	Attended
10/01/2010	10/31/2010	142.040	20	1338.390	126	Attended
11/01/2010	11/30/2010	136.970	20	1475.360	146	Attended
12/01/2010	12/31/2010	128.730	18	1604.090	164	Attended
Student Totals				1604.090	164	Hours To Date: 1604.090

STUDENT ATTENDANCE HISTORY

Printed on: 06/08/2012 11:13:47 AM

From Date: / /

To Date: **06/08/2012**

Student Name: (b)(6); (b)(7)(C); (b)(7)(C)

Permit #: **0221**

Course Name: **COSMETOLOGY MILADYS/Pvt Pnt** Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
07/01/2010	07/31/2010	41.000	15	41.000	15	Attended
08/01/2010	08/31/2010	84.060	20	125.060	35	Attended
09/01/2010	09/30/2010	137.730	30	262.790	65	Attended
10/01/2010	10/31/2010	42.110	10	304.900	75	Attended
11/04/2010	11/04/2010	7.000	1	311.900	76	Attended
11/05/2010	11/05/2010	7.430	1	319.330	77	Attended
11/09/2010	11/09/2010	7.830	1	327.160	78	Attended
11/10/2010	11/10/2010	6.730	1	333.890	79	Attended
11/11/2010	11/11/2010	4.850	1	338.740	80	Attended
11/23/2010	11/23/2010	4.660	1	343.400	81	Attended
11/30/2010	11/30/2010	4.980	1	348.380	82	Attended
12/01/2010	12/31/2010	86.560	15	434.940	97	Attended
01/01/2011	01/31/2011	45.900	8	480.840	105	Attended
02/01/2011	02/28/2011	71.880	12	552.720	117	Attended
03/01/2011	03/31/2011	67.710	10	620.430	127	Attended
04/06/2011	04/06/2011	7.420	1	627.850	128	Attended
04/14/2011	04/14/2011	6.060	1	633.910	129	Attended
Student Totals				633.910	129	Hours To Date: 633.910

STUDENT ATTENDANCE HISTORY

Printed on: 06/08/2012 10:34:02 AM

From Date: / /

To Date: 06/08/2012

Student Name: (b)(6); (b)(7)(C), (b)(7)(C)

Permit #: 9973

Course Name: COSMETOLOGY MILADYS/Pvt Pnt Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
12/01/2010	12/31/2010	60.000	31	60.000	31	Attended
01/01/2011	01/31/2011	20.670	5	80.670	36	Attended
02/01/2011	02/28/2011	48.510	10	129.180	46	Attended
Student Totals				129.180	46	Hours To Date: 129.180

STUDENT ATTENDANCE HISTORY

Printed on: 06/08/2011 10:21:52 AM

From Date: / /

To Date: 06/08/2011

Student Name: (b)(6); (b)(7)(C); (b)(7)(C)

Permit No: 111111

Course Name: COSMETOLOGY MILADYS/Pvt Pnt Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
01/01/2010	01/29/2010	85.980	8	85.980	8	Attended
02/01/2010	02/28/2010	83.780	7	169.760	15	Attended
03/01/2010	03/31/2010	96.740	15	266.500	30	Attended
04/01/2010	04/30/2010	113.100	10	379.600	40	Attended
05/01/2010	05/13/2010	50.040	5	429.640	45	Attended
05/01/2010	05/28/2010	57.030	5	486.670	50	Attended
06/01/2010	06/30/2010	62.470	6	549.140	56	Attended
07/01/2010	07/31/2010	84.990	8	634.130	64	Attended
08/03/2010	08/03/2010	11.330	1	645.460	65	Attended
08/04/2010	08/04/2010	12.000	1	657.460	66	Attended
08/07/2010	08/07/2010	2.000	1	659.460	67	Attended
08/01/2010	08/31/2010	57.210	5	716.670	72	Attended
09/01/2010	09/30/2010	59.440	5	776.110	77	Attended
10/01/2010	10/31/2010	89.020	31	865.130	108	Attended
11/02/2010	11/02/2010	0.410	1	865.540	109	Attended
11/03/2010	11/03/2010	7.340	1	872.880	110	Attended
11/04/2010	11/04/2010	11.050	1	883.930	111	Attended
11/05/2010	11/05/2010	7.110	1	891.040	112	Attended
11/10/2010	11/10/2010	2.810	1	893.850	113	Attended
11/12/2010	11/12/2010	7.110	1	900.960	114	Attended
11/16/2010	11/16/2010	11.180	1	912.140	115	Attended
11/17/2010	11/17/2010	2.450	1	914.590	116	Attended
11/18/2010	11/18/2010	3.200	1	917.790	117	Attended
11/19/2010	11/19/2010	7.030	1	924.820	118	Attended
11/23/2010	11/23/2010	7.830	1	932.650	119	Attended
11/24/2010	11/24/2010	3.610	1	936.260	120	Attended
12/01/2010	12/31/2010	140.360	31	1076.620	151	Attended
01/01/2011	01/31/2011	97.350	31	1173.970	182	Attended
02/01/2011	02/28/2011	108.480	28	1282.450	210	Attended
03/01/2011	03/31/2011	161.100	31	1443.550	241	Attended
04/01/2011	04/30/2011	70.850	30	1514.400	271	Attended
Student Totals				1514.400	271	Student Totals: 1514.400

STUDENT ATTENDANCE HISTORY

Printed on: 06/08/2012 10:02:38 AM

From Date: / /

To Date: **06/08/2012**

Student Name: (b)(6); (b)(7)(C); (b)(7)(C)

Permit #: 9460

Course Name: COSMETOLOGY MILADYS/Pvt Pnt Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
05/01/2010	05/28/2010	56.000	5	56.000	5	Attended
06/01/2010	06/30/2010	111.500	10	167.500	15	Attended
07/01/2010	07/31/2010	156.600	14	324.100	29	Attended
08/01/2010	08/31/2010	187.280	31	511.380	60	Attended
09/01/2010	09/30/2010	164.100	14	675.480	74	Attended
10/01/2010	10/31/2010	79.490	31	754.970	105	Attended
11/02/2010	11/02/2010	10.980	1	765.950	106	Attended
11/03/2010	11/03/2010	7.380	1	773.330	107	Attended
11/04/2010	11/04/2010	10.990	1	784.320	108	Attended
11/05/2010	11/05/2010	6.270	1	790.590	109	Attended
11/09/2010	11/09/2010	10.020	1	800.610	110	Attended
11/11/2010	11/11/2010	7.510	1	808.120	111	Attended
11/12/2010	11/12/2010	7.540	1	815.660	112	Attended
11/16/2010	11/16/2010	10.430	1	826.090	113	Attended
11/17/2010	11/17/2010	6.290	1	832.380	114	Attended
11/18/2010	11/18/2010	6.510	1	838.890	115	Attended
11/19/2010	11/19/2010	7.980	1	846.870	116	Attended
11/23/2010	11/23/2010	10.570	1	857.440	117	Attended
11/30/2010	11/30/2010	8.550	1	865.990	118	Attended
12/01/2010	12/31/2010	187.040	31	1053.030	149	Attended
01/01/2011	01/31/2011	96.250	31	1149.280	180	Attended
02/01/2011	02/28/2011	99.910	28	1249.190	208	Attended
03/01/2011	03/31/2011	102.850	31	1352.040	239	Attended
04/01/2011	04/30/2011	111.510	30	1463.550	269	Attended
05/01/2011	05/31/2011	108.060	31	1571.610	300	Attended
Student Totals				1571.610	300	Hours To Date: 1571.610

STUDENT ATTENDANCE HISTORY

Printed on: 06/05/2012 04:13:00 PM

From Date: / /

To Date: 06/30/2011

Student Name: (b)(6); (b)(7)(C); (b)(7)(C)

Permit #: 4805

Course Name: COSMETOLOGY MILADYS/Pvt Pnt Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
05/04/2011	05/04/2011	4.540	1	260.580	43	Attended
05/05/2011	05/05/2011	0.000	0	260.580	43	Absent
05/06/2011	05/06/2011	3.310	1	263.890	44	Attended
05/10/2011	05/10/2011	0.000	0	263.890	44	Absent
05/11/2011	05/11/2011	0.000	0	263.890	44	Absent
05/12/2011	05/12/2011	0.000	0	263.890	44	Absent
05/13/2011	05/13/2011	0.000	0	263.890	44	Absent
05/17/2011	05/17/2011	4.190	1	268.080	45	Attended
05/18/2011	05/18/2011	4.790	1	272.870	46	Attended
05/19/2011	05/19/2011	0.000	0	272.870	46	Absent
05/20/2011	05/20/2011	0.000	0	272.870	46	Absent
05/24/2011	05/24/2011	5.040	1	277.910	47	Attended
05/25/2011	05/25/2011	6.150	1	284.060	48	Attended
05/26/2011	05/26/2011	7.220	1	291.280	49	Attended
05/27/2011	05/27/2011	7.780	1	299.060	50	Attended
05/31/2011	05/31/2011	5.800	1	304.860	51	Attended
06/01/2011	06/01/2011	5.330	1	310.190	52	Attended
06/02/2011	06/02/2011	5.320	1	315.510	53	Attended
06/03/2011	06/03/2011	2.770	1	318.280	54	Attended
06/04/2011	06/04/2011	0.000	0	318.280	54	Absent
06/07/2011	06/07/2011	5.610	1	323.890	55	Attended
06/08/2011	06/08/2011	3.330	1	327.220	56	Attended
06/09/2011	06/09/2011	5.090	1	332.310	57	Attended
06/10/2011	06/10/2011	5.040	1	337.350	58	Attended
06/14/2011	06/14/2011	3.550	1	340.900	59	Attended
06/15/2011	06/15/2011	4.120	1	345.020	60	Attended
06/16/2011	06/16/2011	6.470	1	351.490	61	Attended
06/17/2011	06/17/2011	7.650	1	359.140	62	Attended
06/21/2011	06/21/2011	5.620	1	364.760	63	Attended
06/22/2011	06/22/2011	7.250	1	372.010	64	Attended
06/23/2011	06/23/2011	4.830	1	376.840	65	Attended
06/24/2011	06/24/2011	0.000	0	376.840	65	Absent
06/25/2011	06/25/2011	0.000	0	376.840	65	Absent
06/28/2011	06/28/2011	6.700	1	383.540	66	Attended
06/29/2011	06/29/2011	5.950	1	389.490	67	Attended
06/30/2011	06/30/2011	8.650	1	398.140	68	Attended
Student Totals				398.140	68	Hours To Date: 441.150

STUDENT ATTENDANCE HISTORY

Printed on: 05/05/2011 04:30:00 PM

From Date: / /

To Date: 06/30/2011

Student Name: (b)(6); (b)(7)(C); (b)(7)(C)

Permit #: 4826

Course Name: COSMETOLOGY MILADYS/Pvt Pnt Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
01/18/2011	01/18/2011	10.000	1	10.000	1	Attended
01/20/2011	01/20/2011	10.000	1	20.000	2	Attended
01/21/2011	01/21/2011	10.000	1	30.000	3	Attended
01/23/2011	01/23/2011	10.000	1	40.000	4	Attended
01/25/2011	01/25/2011	10.000	1	50.000	5	Attended
01/27/2011	01/27/2011	10.000	1	60.000	6	Attended
01/29/2011	01/29/2011	10.000	1	70.000	7	Attended
02/01/2011	02/01/2011	10.000	1	80.000	8	Attended
02/03/2011	02/03/2011	10.000	1	90.000	9	Attended
02/05/2011	02/05/2011	10.000	1	100.000	10	Attended
02/06/2011	02/06/2011	10.000	1	110.000	11	Attended
02/12/2011	02/12/2011	9.910	1	119.910	12	Attended
03/01/2011	03/01/2011	2.680	1	122.590	13	Attended
03/02/2011	03/02/2011	5.250	1	127.840	14	Attended
03/03/2011	03/03/2011	4.180	1	132.020	15	Attended
03/04/2011	03/04/2011	7.280	1	139.300	16	Attended
03/08/2011	03/08/2011	6.470	1	145.770	17	Attended
03/10/2011	03/10/2011	5.230	1	151.000	18	Attended
03/11/2011	03/11/2011	0.970	1	151.970	19	Attended
03/16/2011	03/16/2011	3.090	1	155.060	20	Attended
03/17/2011	03/17/2011	4.250	1	159.310	21	Attended
03/22/2011	03/22/2011	4.600	1	163.910	22	Attended
03/23/2011	03/23/2011	3.320	1	167.230	23	Attended
03/24/2011	03/24/2011	6.070	1	173.300	24	Attended
03/25/2011	03/25/2011	5.960	1	179.260	25	Attended
03/29/2011	03/29/2011	4.870	1	184.130	26	Attended
03/30/2011	03/30/2011	2.930	1	187.060	27	Attended
03/31/2011	03/31/2011	3.630	1	190.690	28	Attended
04/01/2011	04/01/2011	6.800	1	197.490	29	Attended
04/05/2011	04/05/2011	5.670	1	203.160	30	Attended
04/06/2011	04/06/2011	4.580	1	207.740	31	Attended
04/07/2011	04/07/2011	3.670	1	211.410	32	Attended
04/08/2011	04/08/2011	4.420	1	215.830	33	Attended
04/12/2011	04/12/2011	5.450	1	221.280	34	Attended
04/13/2011	04/13/2011	4.100	1	225.380	35	Attended
04/14/2011	04/14/2011	4.670	1	230.050	36	Attended
04/15/2011	04/15/2011	6.400	1	236.450	37	Attended
04/19/2011	04/19/2011	4.290	1	240.740	38	Attended
04/22/2011	04/22/2011	4.550	1	245.290	39	Attended
04/26/2011	04/26/2011	2.050	1	247.340	40	Attended
04/28/2011	04/28/2011	4.850	1	252.190	41	Attended
04/29/2011	04/29/2011	3.850	1	256.040	42	Attended
05/03/2011	05/03/2011	0.000	0	256.040	42	Absent

STUDENT ATTENDANCE HISTORY

Printed on: 06/05/2012 04:13:00 PM

From Date: / /

To Date: 06/30/2011

Student Name: (b)(6); (b)(7)(C);(b)(7)(C)

Permit #: 8140

Course Name: COSMETOLOGY MILADYS/Pvt Pnt Cumulative Total For

Start Date	End Date	Hours	Days	Hours	Days	
09/01/2009	09/30/2009	120.000	10	120.000	10	Attended
10/01/2009	10/31/2009	133.750	12	253.750	22	Attended
11/01/2009	11/25/2009	90.000	8	343.750	30	Attended
12/01/2009	12/30/2009	90.000	8	433.750	38	Attended
01/01/2010	01/29/2010	102.060	9	535.810	47	Attended
02/01/2010	02/28/2010	114.780	10	650.590	57	Attended
03/01/2010	03/31/2010	118.590	10	769.180	67	Attended
04/01/2010	04/30/2010	134.640	12	903.820	79	Attended
05/01/2010	05/13/2010	45.150	4	948.970	83	Attended
05/01/2010	05/28/2010	56.680	5	1005.650	88	Attended
06/01/2010	06/30/2010	103.060	9	1108.710	97	Attended
07/01/2010	07/31/2010	87.010	8	1195.720	105	Attended
08/03/2010	08/03/2010	12.000	1	1207.720	106	Attended
08/04/2010	08/04/2010	11.900	1	1219.620	107	Attended
08/05/2010	08/05/2010	12.000	1	1231.620	108	Attended
08/06/2010	08/06/2010	12.000	1	1243.620	109	Attended
08/07/2010	08/07/2010	5.000	1	1248.620	110	Attended
08/01/2010	08/31/2010	54.630	5	1303.250	115	Attended
09/01/2010	09/17/2010	52.110	5	1355.360	120	Attended
06/21/2011	06/21/2011	5.150	1	1360.510	121	Attended
06/22/2011	06/22/2011	0.000	0	1360.510	121	Absent
06/23/2011	06/23/2011	0.000	0	1360.510	121	Absent
06/24/2011	06/24/2011	0.000	0	1360.510	121	Absent
06/28/2011	06/28/2011	2.970	1	1363.480	122	Attended
06/30/2011	06/30/2011	0.000	0	1363.480	122	Absent
Student Totals				1363.480	122	Hours To Date: 1516.900

Response to Finding #2

Lack of Administrative Capability: Because of the timing of the unscheduled audit, the majority of the personnel involved in the financial aid process were not available when the audit was conducted. I was not able to properly communicate at that time the personnel involved, their roles in the process or the internal checks and balances that the school has always maintained. Please allow us to explain further the policies and procedures used in our financial aid process and to submit the attached duties and job descriptions of the personnel involved.

The following personnel divide the duties of the financial aid process:

- Admissions Administrator – Print's ISIR's and conducts verifications if required, prints Award Notification Letters and reviews with students, conducts and documents entrance loan counseling, conducts and documents exit loan counseling
- Records Administrator – Maintains files for all students, maintains time and attendance records for all students, processes paperwork for students who withdraw from the program
- Academic Dean – Sets up students in Premier software program, monitors student clock hours and provides reports to Business Manager, verifies that G/L matches software program for every student on monthly basis
- Business Manager – Verifies hours and processes Title IV payment requests for all students, authorizes payments and updates G/L for students, documents and processes paperwork for all returns to Title IV for students who withdraw
- External Accountant – Disburses Title IV payments and records transactions in school's business records, reconciles bank accounts and verifies internal controls have been followed regarding Title IV payments

As you can see, the financial aid process involves five different individuals who have all received training in their specific areas of responsibility. Furthermore, there is a clear separation of the duties involved in authorizing payments and disbursing funds. There is also a set of checks and balances within the process that include external accounting personnel with no related party interest.

I am sorry that I was not able to adequately document the personnel or procedures involved in our financial aid process at the time of your audit. We dispute your finding of a lack of administrative capability and we seek to correct your impression that the department is inadequately staffed by the presentation of the above personnel summary and the enclosed description of duties that follow this particular finding. We request that you revise your determination on our personnel and internal controls and find that we are in compliance with 34 C.F.R. 668.16.

Admissions Administrator

Overview

The purpose of this position is to execute the efficient processing of new students into the school and answers directly to the CEO. This position will be responsible for verifying that all procedures related to admissions are conducted in accordance with state and federal regulations regarding post secondary education institutions.

Primary Job Duties

- Interviews prospective new students and processes enrollment applications
- Advises students on tuition payment options and Financial Aid Procedures
- Responsible for getting contracts signed by new students
- Retrieves ISIR results from G5 website on prospective new students
- Completes all verification procedures required on ISIR forms
- Generates award letters for financial aid and reviews with new students
- Enters and maintains student information in Student H program
- Conducts orientations for new students on school policies and procedures

Secondary Job Duties

- Supervises receptionist and coordinates scheduling
- Performs training for new students on time clock utilization
- Supervises salon floor billing transactions
- Generates daily, weekly and monthly reports on salon billings
- Responsible for inventory control and ordering of supplies
- Responsible for ordering diplomas for graduating students
- Other duties as required

Job Requirements

- High School Diploma or equivalent
- Strong interpersonal skills
- Excellent verbal and written communication skills
- Knowledge of Microsoft Windows and Microsoft Office software
- Prior experience in Cosmetology industry

Records Administrator

Overview

The purpose of this position is to ensure compliance of all record keeping requirements for students and answers directly to the Academic Dean. This position will be responsible for verifying that all files contain complete and accurate information on each student in accordance with state and federal regulations regarding cosmetology programs.

Primary Job Duties

- Maintains files for all current and past students
- Inspects and certifies that all records are complete and accurate
- Maintains time and attendance records in Premier system
- Performs data entry functions required by Academic Dean
- Processes paperwork for students who drop
- Conducts correspondence with students after leaving school

Secondary Job Duties

- Records salon tickets in Premier system
- Assists Academic Dean with grading
- Maintains attendance statistics and compliance reports
- Other duties as required

Job Requirements

- High School Diploma or equivalent
- Strong interpersonal skills
- Excellent verbal and written communication skills
- Knowledge of Microsoft Windows and Microsoft Office software
- Strong organizational skills

Academic Dean

Overview

The purpose of this position is to supervise all aspects of each students academic progress and answers directly to the CEO. This position will be responsible for verifying that all academic requirements are met for each student in accordance with state and federal regulations regarding cosmetology programs.

Primary Job Duties

- Manages curriculum and creates tests and rubrics
- Enters info into Premier for all students
- Supervises instructor program and teaches classes
- Supervises salon floor activities and monitors student performance
- Maintains schedules for students and monitors program hours
- Handles all test scheduling for state board exams
- Provides feedback and counseling for students on academic progress
- Verifies that Premier matches G/L on monthly basis

Secondary Job Duties

- Supervises Records Administrator and review compliance record keeping
- Prepares transcripts for CEO to sign
- Resolves post graduate issues for former students
- Maintains government reporting requirements as assigned
- Covers all breaks, sick leave and vacation for other instructors
- Responsible for opening school every morning
- Other duties as required

Job Requirements

- High School Diploma or equivalent
- Strong interpersonal skills
- Excellent verbal and written communication skills
- Knowledge of Microsoft Windows and Microsoft Office software
- Active Master Cosmetology license and prior experience in the industry
- Active Cosmetology Instructor's License
- Maintain required continuing education hours

Business Manager

Overview

The purpose of this position is to ensure the correct processing of all business transactions for the college and answers directly to the CEO. This position will be responsible for verifying that all procedures related to financial aid are conducted in accordance with state and federal regulations regarding post secondary education institutions.

Primary Job Duties

- Reviews hours report monthly from Academic Dean
- Enters info into Ed Express and Ed Connect for each student
- Generates call down sheet for Title IV payments
- Originates loans and processes Pell payments
- Verifies that promissory notes are signed by students and properly filed
- Maintains and updates G/L for every student
- Creates documentation of financial aid transactions to request disbursements
- Documents and processes all returns of Title IV funds

Secondary Job Duties

- Performs instructor duties as required
- Backs up other instructors on the salon floor
- Generates monthly reports to reconcile financial aid transactions
- Other duties as required

Job Requirements

- High School Diploma or equivalent
- Strong interpersonal skills
- Excellent verbal and written communication skills
- Knowledge of Microsoft Windows and Microsoft Office software
- Active Master Cosmetology license and prior experience in the industry
- Active Instructor's license
- Maintains continuing education requirements

Response to Finding #3

Entrance/Exit Counseling for Direct Loans: Entrance counseling for Direct Loans is conducted by an interactive electronic means during the enrollment process. Students must take the required entrance counseling prior to completing the master promissory note on the federal website. The student then meets with the Admissions Administrator who is able to answer any questions that the student borrower may have. The Admissions Administrator prints a copy of the master promissory note for the student's financial aid file. The school therefore relies on the procedures that the federal government already has in place to insure that all student borrowers have received the required entrance counseling prior to any loan being issued to them.

When a student graduates, the school requires them to complete the exit counseling booklet provided by the federal government and meet with the Admissions Administrator again to answer any questions that they may have. The student then fills out the acknowledgment page of that booklet which serves as proof that they have received the required exit counseling.

In the event that the student leaves the school or simply stops coming, they are contacted by phone and by mail to come in for an exit interview. At the time of the exit interview, they are provided the exit counseling booklet and have an opportunity to have any loan questions answered. Once again, this documentation is added to their file as proof that they have received the required exit counseling. If they do not come in, an exit counseling booklet is mailed to them by certified mail return receipt and this documentation is added to their file as proof of exit counseling.

The school has always conducted the entrance/exit counseling required by 34 C.F.R. 685.304. It is likely that we would have been able to show you the proper documentation or better answered your questions regarding our loan procedures if the Admissions Administrator had not been on a scheduled vacation at the time of your unscheduled audit. We do assert that we have procedures in place regarding entrance/exit counseling and are including them for your review with the response to this particular finding. We firmly believe that these procedures are in keeping with the statutes and regulations regarding Title IV borrowers and therefore we are in compliance on this issue.

Cobb Beauty College Procedures for Entrance/Exit Counseling on Direct Loan Program

Purpose: The purpose of this procedure is to make certain that all students involved in the Direct Loan Program have received the necessary entrance/exit counseling required by 34 C.F.R. 685.304 and that proper documentation of that counseling is maintained in their student financial aid file.

Procedure:

- Every student who is eligible for the Direct Loan Program will complete the entrance counseling by interactive electronic means during the enrollment process
- Every student will verify that they have received the entrance counseling by completing the master promissory note that is part of the federal financial aid process
- The Admissions Administrator will interview the student prior to enrollment to answer any questions that the student has concerning the Direct Loan Program and print a copy of the master promissory note at that time
- The master promissory note will be kept in the student's financial aid file as proof that they have received the necessary entrance counseling by means of computer assisted technology
- Every student who receives a loan through the Direct Loan Program will be required to complete the exit counseling booklet provided by the federal government prior to graduation and will meet with the Admissions Administrator to answer any of the student borrower's questions
- Every student who receives a loan will fill out the acknowledgment page of the exit counseling booklet and this documentation will be placed in the student's financial aid file as proof that they received the required exit counseling regarding their Direct Loan
- In the event that a student withdraws from the school or simply stops coming, the student will be required to come in and complete the exit counseling booklet and fill out the acknowledgment page after meeting with the Admissions Administrator
- If the student refuses to come in or simply is unable to be contacted, an exit counseling booklet will be sent by certified mail return receipt to their address and the proof of certified delivery will be kept in their financial aid file as documentation of their exit counseling
- No transcripts or other documentation will be provided by the school to any student until proper proof of exit counseling is obtained from them

Response to Finding #4

Missing and Inadequate Award Notification Letters: Award Notification Letters are provided by the Admissions Administrator to every student that qualifies for Title IV assistance. During the enrollment process, the Admissions Administrator reviews the ISIR results with each prospective student. She explains the tuition and fees of the school with each prospective student to gauge their interest in the school and then prints out an Award Notification Letter based on their response. These Award Notification Letters provide the student with the amount of funds available and when those funds will be disbursed. The letters are then signed by the student and placed in their financial aid file as documentation of the school's compliance with the statutes and regulations for Title IV disbursements.

At the time of the audit, the school kept award letters in a separate binder for each award year. I misunderstood the documentation that you were looking for as proof of our compliance and did not provide it to you. Please refer to the enclosed Award Notification Procedures that the school uses which clearly indicates our compliance with 34 C.F.R. 668.165. Also enclosed for your review is a sample award letter that the school provides to every student receiving Title IV funds. I believe that when you review these two documents, you will find that we are indeed in compliance when it comes to this particular finding.

Cobb Beauty College

Procedures for Award Notification Letters

Purpose: The purpose of this procedure is to make certain that all students receiving Title IV funds have been provided a proper award letter that indicates the amount of the funds and when those funds will be disbursed required by 34 C.F.R. 668.165 and that proper documentation of that award letter is maintained in their student financial aid file.

Procedure:

- Every student who is eligible for Title IV funds will be provided an award letter by the Admissions Administrator during the enrollment process
- This Award Letter will clearly delineate the amount of Title IV funds available to the student and when the student can expect those funds to be disbursed
- The student will have the opportunity to ask questions of the Admissions Administrator regarding their award letter
- Once the student and Admissions Administrator have reviewed the award letter, the student will be required to sign the award letter and it will be included in their financial aid file as proof of their compliance with the statutes and regulations for Title IV disbursements
- Title IV funds will not be disbursed to any student until their financial aid file is complete and verification is made that the signed award letter is included in their file

Response to Finding #5

Missing High School Diploma: In regards to this finding, I believe that the audit team overlooked the High School Diploma that was indeed part of the file for student #9. Enclosed with our response to this finding is a copy of the High School Diploma for this student. The school's admissions policy clearly states that an applicant must have a High School Diploma, or its equivalent, a GED, or ATB to be enrolled as a regular student and receive FSA funds. The documentation provided clearly meets that requirement.

As further proof of the documentation meeting the requirements of 34 C.F.R. 668.32, the same document was provided by Student #9 to the Cosmetology Board of Georgia which requires proof of High School Diploma or equivalency before allowing someone to take their state board tests. Student #9 provided this same document to the Cosmetology Board and it was accepted. Student #9 was allowed to take her state board tests and has obtained her cosmetology license with the state.

In light of the diploma provided in response to this finding, Cobb Beauty College assures that all students in the past or in the future do provide proof of a High School Diploma or its equivalent and that documentation is part of every student's financial aid file. We therefore dispute the finding in this particular case and do not feel that we should be subject to any liability or made to repay any disbursements associated with student #9.

A and J Translation Service

7d. 377-4760

Emblem

c/o Ms. A. Khramova
15 Alton Place
Brooklyn, N.Y. 11210

Azerbadjan S S R

Department of Education of Azaerbadjan SSR

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

CERTIFICATE OF HIGH SCHOOL GRADUATION

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

Azerbadjan language	4	(good)
Azerbadjan literature	4	(good)
Russian language	5	(excellent)
Russian literature	5	(excellent)
Mathematics	5	(excellent)
Geometry	5	(excellent)
History of the USSR	4	(good)
General history	4	(good)
Social science	5	(excellent)
Physics	5	(excellent)
Astronomy	5	(excellent)
Chemistry	4	(good)
Biology	5	(excellent)
Geography	5	(excellent)
Foreign language (English)	4	(good)
Drawing	5	(excellent)
Drafting and vocational training	5	(excellent)
Gymnasium	5	(excellent)
Basic military training	3	(satisfactory)

DIRECTOR OF SCHOOL - signature

DEPUTY DIRECTOR - signature

TEACHERS - 3 signatures

Issued on July 26, 1975 City of Baku KR 625237 Official seal

I, A. Khramova (signed) (b)(6); (b)(7)(C), (b)(7)(C) translator, fully competent in both Russian and English languages, certify that the above is a true and faithful translation of document submitted to me in Russian language, to the best of my knowledge and belief.

State of New York

ss

County of Kings

Sworn to before me

this 19th of July, 1982

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

JOSEPH MORALES
Notary Public, State of New York
No. 24-4727402
Qualified in Kings County
Commission Expires March 30, 1984

The Secretary of State of the United States of America hereby requests all whom it may concern to permit the citizen/national of the United States named herein to pass without delay or hindrance and in case of need to give all lawful aid and protection.

Le Secrétaire d'Etat des Etats-Unis d'Amérique prie par les présentes toutes autorités compétentes de laisser passer le citoyen ou ressortissant des Etats-Unis titulaire du présent passeport, sans délai ni difficulté et, en cas de besoin, de lui accorder toute aide et protection légitimes.

El Secretario de Estado de los Estados Unidos de América por el presente solicita a las autoridades competentes permitir el paso del ciudadano o nacional de los Estados Unidos aquí nombrado, sin demora ni dificultades, y en caso de necesidad, prestarle toda la ayuda y protección lícitas.

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

[Redacted Signature Area]

DEL TITULAR

SIGNATURE OF BEARER/SIGNATURE

NOT VALID UNTIL SIGNED

PASSPORT
PASSEPORT
PASAPORTE

UNITED STATES OF AMERICA

Type / Type / Tipo Code / Code / Código USA Passport No. / No. du Passeport / No. de Pasaporte (b)(6); (b)(7)(C)

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

[Redacted Name and Address Area]

Name / Nom / Apellidos (b)(6); (b)(7)(C)
Given names / Prénoms / Nombres (b)(6); (C)
Nationality / Nationalité / Nacionalidad UNITED STATES OF AMERICA
Date of birth / Date de naissance / Fecha de nacimiento (b)(6); (b)(7)(C)
Sex / Sexe / Sexo (b)(6); (b)(7)(C)
Date of issue / Date de délivrance / Fecha de expedición 24 May 2000
Date of expiration / Date d'expiration / Fecha de caducidad 23 May 2010
Amendments / Modifications / Enmiendas See Page 24
Authority / Autorité / Autoridad National Passport Center

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

[Redacted Area]

UNITED STATES DEPARTMENT OF JUSTICE

No. 100-100000

COURT OF APPEALS FOR THE SECOND CIRCUIT

NATURALIZATION COURT

Petition No. (b)(6); (b)(7)(C), (b)(7)(C)

JWS Registration No. (b)(6); (b)(7)(C), (b)(7)(C)

ORIGINAL



Estelle Riberson
(Complete and true signature of holder)

UNITED STATES OF AMERICA } ss:
EASTERN DIST. OF NEW YORK }

Be it known that at a term of the _____ District _____ Court of
The United States _____

held pursuant to law at _____ Brooklyn _____
on _____ OCTOBER 20, 1989 _____ the Court having found that
(b)(6); (b)(7)(C), (b)(7)(C)

_____ FLUSHING, NEW YORK
_____ and stands to reside permanently in the United States (whom so required by the
Naturalization Laws of the United States), had in all other respects complied with
the applicable provisions of such naturalization laws, and was entitled to be
admitted to citizenship, thereupon ordered that such person be and (s)he was
admitted as a citizen of the United States of America.

In testimony whereof the seal of the court is hereto affixed, this 20TH
day of _____ OCTOBER _____ nineteen hundred and
EIGHTY-NINE

ROBERT C. HEINEMANN

Clerk of the _____ U. S. District _____ Court.
(b)(6); (b)(7)(C), (b)(7)(C)

By _____ Deputy Clerk.

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

Estelle Riberson

IT IS PUNISHABLE BY U. S. LAW TO COPY,
PRINT OR PHOTOGRAPH THIS CERTIFICATE,
WITHOUT LAWFUL AUTHORITY.

DEPARTMENT OF JUSTICE

81

UNITED STATES DEPARTMENT OF JUSTICE

No. _____

OFFICE OF THE CLERK OF COURT

NEW YORK COUNTY CLERK

Petition No. (b)(6); (b)(7)(C), (b)(7)(C)

ORIGINAL

N.Y. Registration No. (b)(6); (b)(7)(C), (b)(7)(C)

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

(b)(4)

82

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

UNITED STATES OF AMERICA }
EASTERN DIST. OF NEW YORK }

ss:

Be it known that at a term of the _____ District _____ Court of
The United States _____

held pursuant to law at _____ Brooklyn _____
on _____ OCTOBER 20, 1989 _____ the Court having found that

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

_____ was residing at _____ FLUSHING, NEW YORK
intends to reside permanently in the United States (upon so required by the
Naturalization Laws of the United States), had in all other respects complied with
the applicable provisions of such naturalization laws, and was entitled to be
admitted to citizenship, thereupon ordered that such person, be and (s)he was
admitted as a citizen of the United States of America.

In testimony whereof the seal of the court is hereunto affixed, this 20TH
day of _____ OCTOBER _____ nineteen hundred and
EIGHTY-NINE

ROBERT C. MEINEMANN

Clerk of the _____ U. District _____ Court

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

By _____

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PRINT OR PHOTOGRAPHING THIS CERTIFICATE
WITHOUT LAWFUL AUTHORITY.

DEPARTMENT OF JUSTICE

Response to Finding #6

Overaward – Financial Need Exceeded: The information regarding this finding for student #6 were incomplete which I believe lead to the appearance that the financial need had been exceeded. When examining the contract in student #6's file, the examiner only took the contract amount for tuition which was \$9,750 as stated. However, in addition to this amount, the student was also responsible for \$300 in state board fees, \$500 for an advanced hair cutting class and \$159 for mannequins related to that class which is a grand total of \$10,709 of allowable charges. Student #6 received a total of \$10,236 of need based Title IV payments. She paid the balance of \$473 directly to the school. All additional funds received by this student were paid directly to her as living expenses in keeping with all rules and regulations in 34 C.F.R. 668.35.

In regards to student #8, the school was in the process of considering a professional judgment for her which would have reduced her EFC. An award letter was generated for the student that included a subsidized loan in the amount of \$3500. However, the student was unable to provide adequate documentation for the professional judgment but the award letter was not revised. The school incorrectly awarded the subsidized loan and we agree that we are liable to repay it. We will await additional instructions in relation to this finding in order to repay the ineligible disbursement for student #8.

The school has taken significant care in reviewing all policies and procedures with all of the individuals involved in the financial aid process. Included with this response, we have provided multiple examples of the policies and procedures that are in place to assure compliance with all rules and regulations regarding Title IV disbursements. We assure you that we take our responsibility with regard to Title IV payments very seriously and make every effort to guarantee compliance in every aspect of the program.

Response to Finding #7

Failure to Document Professional Judgment: Student #2 received a modification in her adjusted gross income as a result of her mother's unemployment. At the time of the judgment, the mother and student submitted a written request for this professional judgment and a copy of one of the mother's unemployment checks. These documents were referenced in the letter of professional judgment that the school entered into her financial aid file. The school has made several attempts to contact the student and her mother by phone, e-mail and direct mail in an attempt to get additional copies of these documents. Enclosed with the response to this finding are copies of our attempts to communicate with the student. We have been unable to get the student or her mother to respond to any of these communication attempts.

HEA Sec. 479A(a.) allows that an aid administrator may use professional judgment on a case-by-case basis. There are no specific standards as to the exact documentation that must be provided by the student but rather that the judgment of the aid administrator must be documented. The school did precisely that in this instance and referenced the exact documents that were used to arrive at their decision in their letter which was in the file. We firmly believe that we followed all rules and regulations regarding this situation and that we were fully in compliance regarding this finding. We disagree that any refund is due in regards to this particular finding.

Response to Finding #8

Incomplete Verification: The school has always complied with all rules and regulations in regards to verification of ISIR's set down by 34 C.F.R. 668.16, 668.51 through 668.61. We reference the procedures that we provided in response to Finding #2 and Finding #3 as evidence that we do follow a specific course of action in regards to verification. The Admissions Administrator is responsible for completing this function, the Records Administrator verifies that all documents are present in each student's file and the Business Manager double checks the information prior to authorizing any payment of Title IV funds.

In regards to the specific students referenced in this finding:

- Student #18 has signed her Dependent Verification Worksheet and submitted a copy of her parent's Income Tax Return. These documents are enclosed with the response to this finding.
- Student #22 received a professional judgment changing her AGI from \$55,551 to \$37,274. Enclosed with the response to this finding are all of the documents related to that professional judgment.
- Student #23 had all of the proper documentation in her file. The auditor was incorrect in their statement that the AGI was actually \$13,369. The auditor looked at the line for itemized deductions rather than at the line for AGI which was indeed \$36,011. Enclosed with the response to this finding is a copy of the tax return with the correct fields highlighted.
- Student #24 and her spouse have signed their tax return. This document is enclosed with the response to this finding.

As part of the response to this finding, the school engaged the services of an Independent Public Accountant to conduct a file review of all students in the 2009-2010 and 2010-2011 award years. The IPA conducted this testing after receiving approval of his procedures from you on July 2 as referenced in the e-mail included in this response. The result of his finding, which is also enclosed, was that there were no exceptions in any of the files for any student in either award year.

We have provided with the response to this particular finding the completed documentation for the specific students you tested. In addition, we have had all of the files independently verified to make certain no deficiencies exist. Consequently, we disagree with this particular finding and we assert that we are in compliance with all rules and regulations with respect to verifications. There are no students who received an ineligible disbursement and we do not owe any repayments in regards to this particular finding.



2009-2010 Verification Worksheet

Federal Student Aid Programs

Independent

FORM APPROVED
OMB NO. 1845-0041

Your application was selected for review in a process called "Verification." In this process, your school will be comparing information from your application with signed copies of your (and your spouse's, if you are married) 2008 Federal tax forms, or with W-2 forms or other financial documents. The law says we have the right to ask you for this information before awarding Federal aid. If there are differences between your application information and your financial documents, you or your school may need to make corrections electronically or by using your Student Aid Report (SAR).

Complete this verification form and submit it to your financial aid administrator as soon as possible, so that your financial aid won't be delayed. Your financial aid administrator will help you.

What you should do

1. Collect your (and your spouse's) financial documents (signed Federal income tax forms, W-2 forms, etc.).
2. Talk to your financial aid administrator if you have questions about completing this worksheet.
3. Complete and sign the worksheet.
4. Submit the completed worksheet, tax forms, and any other documents your school requests to your financial aid administrator.
5. Your financial aid administrator will compare information on this worksheet and any supporting documents with the information you submitted on your application. You or your school may need to make corrections electronically or by using your SAR.

A. Student Information

(b)(6); (b)(7)(C), (b)(7)(C)		(b)(6); (b)(7)(C), (b)(7)(C)	
	Social Security		
	Date of birth		
City	State	ZIP Code	Phone number

B. Family Information

List the people in *your household*, including:

- yourself, and your spouse if you have one, and
- your children, if you will provide more than half of their support from July 1, 2009 through June 30, 2010, even if they do not live with you, and;
- other people if they now live with you, and you provide more than half of their support and will continue to provide more than half of their support from July 1, 2009 through June 30, 2010.

Write the names of all household members in the space(s) below. Also write in the name of the college for any household member, excluding your parent(s), who will be attending at least half time between July 1, 2009 and June 30, 2010, and will be enrolled in a degree, diploma, or certificate program. If you need more space, attach a separate page.

Full Name	Age	Relationship	College
Martha Jones (example)	24	Wife	City University
(b)(6); (b)(7)(C), (b)(7)(C)	45	Self	COBB BEAUM COLLEGE Columbus State University
	38	HUSBAND	
	15	SON	
	13	DAUGHTER	
	5	DAUGHTER	

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 1845-0041. The time required to complete this information collection is estimated to average twelve minutes, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimates or suggestions for improving this form, please write to: US Department of Education, Washington, DC 20202-5445.

C. Student's Tax Forms and Income Information (all applicants)

independent

1. Check only one box below. Tax returns include the 2008 IRS Form 1040, 1040A, 1040EZ, a tax return from Puerto Rico or a foreign income tax return. If you did not keep a copy of your tax return, request a copy from the preparer or request an Internal Revenue Service form that lists tax account information.
- Check here if you are attaching a signed copy of your tax return.
 - Check here if a signed tax return will be submitted to the school by _____ (date).
 - Check here if you will not file and are not required to file a 2008 U.S. Income Tax Return.

2. Funds received for child support and other untaxed income. (See Question 47 of the Free Application for Federal Student Aid (FAFSA).)

Sources of Untaxed Income	2008 Amount	Sources of Untaxed Income	2008 Amount
a. Child Support	\$ 10,800.	d.	\$
b. Workman's Compensation	\$	e.	\$
c. Untaxed Pensions	\$	f.	\$

3. If you did not file and are not required to file a 2008 Federal income tax return, list below your employer(s) and any income received in 2008 (use the W-2 form or other earnings statements if available).

Sources	2008 Income
	\$
	\$
	\$

D. Spouse's Tax Forms and Income Information (if student is married)

1. Check only one box below. Tax returns include the 2008 IRS Form 1040, 1040A, 1040EZ, a tax return from Puerto Rico or a foreign income tax return. If your spouse did not keep a copy of the tax return, request a copy from the tax preparer or request an Internal Revenue Service form that lists tax account information.
- Check here if you are attaching a signed copy of your and your spouse's joint tax return.
 - Check here and attach spouse's signed tax return if your spouse filed a separate return.
 - Check here if a signed spouse's tax return will be submitted to the school by _____ (date).
 - Check here if your spouse will not file and is not required to file a 2008 U.S. Income Tax Return.

2. Funds received for child support and other untaxed income. (See Question 47 of the FAFSA.)

Sources of Untaxed Income	2008 Amount	Sources of Untaxed Income	2008 Amount
a. Child Support	\$	d.	\$
b. Workman's Compensation	\$	e.	\$
c. Untaxed Pensions	\$	f.	\$

3. If your spouse did not file and is not required to file a 2008 Federal income tax return, list below your spouse's employer(s) and any income received in 2008 (use the W-2 form or other earnings statements if available).

Sources	2008 Income
	\$
	\$
	\$

E. Sign this Worksheet

Each person signing this form certifies that all the information reported on it is complete and correct. If married, spouse's signature is optional.

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

Student

Date

5/19/2010

Spouse

Date

WARNING: If you purposely provide or misreporting information on this worksheet, you may be fined, be sentenced to jail, or both.

Do not mail this worksheet to the Department of Education. Submit this worksheet to your Financial Aid Administrator at your school. Don't forget to sign your tax forms.

REFERENCE COPY DO NOT FILE

1040

U.S. Individual Income Tax Return

2008

IRS Use Only - Do not write or staple in this space.

Label (See instructions.) Use the IRS label. Otherwise, please print or type. Presidential Election Campaign Filing Status Exemptions

Check here if you, or your spouse if filing jointly, wish to go to his home (see instructions)
1 Single
2 Married filing jointly (even if only one had income)
3 Married filing separately. Enter spouse's SSN above and full name here.
4 Head of household (with qualifying person). (See instr.)
5 Qualifying widow(er) with dependent child (see instr.)

Exemptions
6a Yourself. If someone can claim you as a dependent, do not check box 6a
6b Spouse
6c Dependents:
(1) First name Last name (2) Dependent's social security number (3) Dependent's relationship to you (4) if qualifying child for child tax credit (see instr.)

Income
7 Wages, salaries, tips, etc. Attach Form(s) W-2
8a Taxable interest. Attach Schedule B if required
8b Tax-exempt interest. Do not include on line 8a
9a Ordinary dividends. Attach Schedule B if required
9b Qualified dividends (see instructions)
10 Taxable refunds, credits, or offsets of state and local income taxes (see instructions)
11 Alimony received
12 Business income or (loss). Attach Schedule C or C-EZ
13 Capital gain or (loss). Attach Schedule D if required. If not required, check here
14 Other gains or (losses). Attach Form 4797

Adjusted Gross Income
15a IRA distributions
15b Taxable amount (see instr.)
16a Pensions and annuities
16b Taxable amount (see instr.)
17 Rental real estate, royalties, partnerships, S corporations, trusts, etc. Attach Schedule E
18 Farm income or (loss). Attach Schedule F
19 Unemployment compensation
20a Social security benefits
20b Taxable amount (see instr.)
21 Other income. List type and amount (see instructions)
22 Add the amounts in the far right column for lines 7 through 21. This is your total income.

Adjusted Gross Income
23 Educator expenses (see instructions)
24 Certain business expenses of reservists, performing artists, and fee-basis government officials. Attach Form 2106 or 2106-EZ
25 Health savings account deduction. Attach Form 8889
26 Moving expenses. Attach Form 3903
27 One-half of self-employment tax. Attach Schedule SE
28 Self-employed SEP, SIMPLE, and qualified plans
29 Self-employed health insurance deduction (see instructions)
30 Penalty on early withdrawal of savings
31a Alimony paid b Recipient's SSN
32 IRA deduction (see instructions)
33 Student loan interest deduction (see instructions)
34 Tuition and fees deduction. Attach Form 8917
35 Domestic production activities deduction. Attach Form 8903
36 Add lines 23 through 31a and 32 through 35
37 Subtract line 36 from line 22. This is your adjusted gross income.

REFERENCE COPY DO NOT FILE

EAG13769.ACR

2008.05

(b) (6)

Tax and Credits	38	Amount from line 37 (adjusted gross income)	38	36,958
Standard Deduction for - ● People who checked any box on line 39a, 39b or 39c OR who can be claimed as a dependent. See instructions. ● All others: Single or Married filing separately. \$5,450 Married filing jointly or Qualifying widow(er). \$10,900 Head of household. \$8,000	39 a	Check <input type="checkbox"/> You were born before January 2, 1944, <input type="checkbox"/> Blind. Total boxes if: <input type="checkbox"/> Spouse was born before January 2, 1944. <input type="checkbox"/> Blind. checked ▶ 39a		
	b	If your spouse itemizes on a separate return or you were a dual-status alien, see instr and check here ▶ 39b <input type="checkbox"/>		
	c	check if standard deduction includes real estates taxes or disaster loss (see instr) ▶ 39c <input checked="" type="checkbox"/>		
	40	Itemized deductions (from Schedule A) or your standard deduction (see left margin)	40	11,900
	41	Subtract line 40 from line 38	41	25,058
	42	If line 38 is \$119,975 or less, or you provided housing to a Midwestern displaced individual, see instructions. Otherwise, multiply \$3,500 by the total number of exemptions claimed on line 6d	42	17,500
	43	Taxable income. Subtract line 42 from line 41. If line 42 is more than line 41, enter -0-	43	7,558
	44	Tax (see instr). Check if any tax is from: a <input type="checkbox"/> Form(s) 8814 b <input type="checkbox"/> Form 4972	44	758
	45	Alternative minimum tax (see instructions). Attach Form 6251	45	
	46	Add lines 44 and 45	46	758
Other Taxes	47	Foreign tax credit. Attach Form 1116 if required	47	
	48	Credit for child and dependent care expenses. Attach Form 2441	48	
	49	Credit for the elderly or the disabled. Attach Schedule R	49	
	50	Education credits. Attach Form 8863	50	
	51	Retirement savings contributions credit. Attach Form 8880	51	
	52	Child tax credit (see instructions). Attach Form 8901 if required	52	758
	53	Credits from Form: a <input type="checkbox"/> 8396 b <input type="checkbox"/> 8839 c <input type="checkbox"/> 5695	53	
	54	Other credits from Form: a <input type="checkbox"/> 3800 b <input type="checkbox"/> 8801 c <input type="checkbox"/>	54	
	55	Add lines 47 through 54. These are your total credits	55	758
	56	Subtract line 55 from line 46. If line 55 is more than line 46, enter -0-	56	NONE
Payments	57	Self-employment tax. Attach Schedule SE	57	
	58	Unreported social security and Medicare tax from Form: a <input type="checkbox"/> 4137 b <input type="checkbox"/> 8919.	58	
	59	Additional tax on IRAs, other qualified retirement plans, etc. Attach Form 5329 if required	59	
	60	Additional taxes: a <input type="checkbox"/> AEIC payments b <input type="checkbox"/> Household employment taxes. Attach Schedule H	60	
	61	Add lines 56 through 60. This is your total tax	61	NONE
	62	Federal income tax withheld from Forms W-2 and 1099	62	3,671
Refund	63	2008 estimated tax payments and amount applied from 2007 return	63	
	64 a	Earned income credit (EIC)	64a	984
	b	Nontaxable combat pay election <input type="checkbox"/> 64b		
	65	Excess social security and tier 1 RRTA tax withheld (see instructions)	65	
	66	Additional child tax credit. Attach Form 8812.	66	2,242
	67	Amount paid with request for extension to file (see instructions)	67	
	68	Credits from Form: a <input type="checkbox"/> 2439 b <input type="checkbox"/> 4136 c <input type="checkbox"/> 8834 d <input type="checkbox"/> 8835	68	
	69	First-time homebuyer credit. Attach Form 5405.	69	
70	Recovery rebate credit (see worksheet in the instructions)	70		
71	Add lines 62 through 70. These are your total payments	71	6,897	
72	If line 71 is more than line 61, subtract line 61 from line 71. This is the amount you overpaid	72	6,897	
Direct deposit? See instructions and fill in 73b, 73c, and 73d. or Form 8888.	73 a	Amount of line 72 you want refunded to you. If Form 8888 is attached, check here ▶ <input type="checkbox"/>	73a	6,897
	b	Routing number	c	Type: <input type="checkbox"/> Checking <input type="checkbox"/> Savings
74	Amount of line 72 you want applied to your 2009 estimated tax ▶	74		
Amount You Owe	75	Amount you owe. Subtract line 71 from line 61. For details on how to pay, see instructions ▶	75	
	76	Estimated tax penalty (see instructions)	76	NONE

Third Party Designee Do you want to allow another person to discuss this return with the IRS (see instructions)? Yes. Complete the following. No

Signature: (b)(6); (b)(7)(C); (b)(7)(C) Personal identification number (PIN): (b)(6); (b)(7)(C)

Sign Here Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Your signature: _____ Date: _____ Your occupation: POLICE OFFICER Daytime phone number: _____

Spouse's signature. If a joint return, both must sign. _____ Date: _____ Spouse's occupation: STUDENT

Paid Preparer's Use Only

Preparer's signature: _____ Date: _____ Check if self-employed Preparer's SSN or PTIN: _____

Firm's name (or yours if self-employed): Jackson Hewitt Tax Service
address, and ZIP code: 5104 Cherokee Street Acworth GA 30101

EIN: (b)(6); (b)(7)(C); (b)(7)(C)
Pho: _____

~ Professional Judgment ~

(b)(6); (b)(7)(C), (b)(7)(D) no longer works. She is attending
CBC full time. ~~They~~ They only have her
husbands income while Jan is in school.

(b) (6)

Supporting Documents:

Statement from

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

(b) (6)

August 1, 2010

CBC
3096 Cherokee Street
Kennesaw, GA 30144
Ms. Michelle Slater

Dear Michelle,

In January of 2010, I lost my full time job as a graphic artist due to the economy and the real estate market.

I worked part time (12 - 14 hours per week) as a server at a restaurant until mid-February and then was unemployed.

Please let me know if this would or could affect my financial aid while attending Cobb Beauty College.

Thank you for your help in this matter.

Sincerely,

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

Response to Finding #9

Incorrect Return of Title IV Calculations: The school has always completed the proper return calculations using the forms available on the federal website for that purpose. When a student withdraws or simply stops coming, the Records Administrator contacts the student by phone or mail to schedule an exit interview. As outlined in the response to Finding #3, the school follows all rules and regulations at the time of the exit interview. The Business Manager uses the federal website to complete the return calculation and includes the documentation in the student's financial aid file. If a return is indicated by the calculation, it is initiated at that time.

In regards to the specific students identified in this finding:

- Student #12 did have a return calculation which showed the school was eligible to keep 100% of the Title IV funds it had received. It is enclosed with the response to this finding and no repayment is due for this student.
- Student #25 did not have a return calculation performed because she had been on a leave of absence and her status was not changed to withdrawn until after the time of the audit. One has been completed since and is included with the response to this finding and a repayment is due for this student.
- Student #30 returned to the school after her withdrawal and completed the program. We did complete a return calculation for the purpose of this finding and it revealed that the school was eligible to keep 100% of the Title IV funds it received. Considering that this student returned and finished the program there is no repayment due for this student.

With this finding as well, we engaged the services of an Independent Public Accountant. You approved his procedures on July 2 and he conducted his testing. His report is included with this response. After testing 100% of all students who withdrew during the two award years in question, the IPA found no exceptions in any of the files. All documentation was present and any returns that were indicated by the documentation had been performed.

We again assert that we are in compliance in regards to this particular finding. The school has completed all required documentation and provided it with this response. In addition, we have had all of the files independently verified to make certain no deficiencies exist. We disagree with this particular finding and we firmly believe that we are in compliance with all rules and regulations with respect to return calculations.

Response to Finding #10

Improper Pell Disbursement Prior to Subsequent Payment Period: In regards to this finding, I believe that the audit team was incorrect in their information. Student # 17 did not even receive her second Pell payment in the amount of \$2100. Enclosed with the answer to this finding is a copy of Pell Processed Disbursements List obtained from the U.S. Department of Education.

Student # 17 began at the school on May 31, 2011. She received her first Pell payment of \$2100 on June 24, 2011 in accordance with all rules and regulations that require the student to be enrolled for classes and the disbursement to occur after the first day of classes. The student did not receive another Pell payment in that award year as verified by the records of the U.S. Department of Education. The student in question did not receive another Pell payment until March 1, 2012 for an entirely different award year. At the time of this disbursement, the student was well beyond the 451 required in the

The school maintains that the procedures that we have submitted to you in response to Finding #1 and Finding #2 document the policies and procedures that we have in place regarding time and attendance procedures and the disbursement of Title IV funds. We disagree with this particular finding in light of the evidence provided by the records of your own department and vehemently disagree that any repayment is required.

Sort: Last Name

THIS DOCUMENT CONTAINS SENSITIVE INFORMATION PROTECTED BY THE PRIVACY ACT

Reporting Pell ID 030906 Name COBB BEAUTY COLLEGE
 Attended Pell ID 030906 Name COBB BEAUTY COLLEGE

STUDENT NAME	CPS TRANS #	AWARD ID	ACCEPTED YTD AMOUNT	AWARD AMOUNT	
(b)(6); (b)(7)(C); (b)(7)(C)	01	(b) (6)	201103090600	\$2,775.00	\$5,550.00
	01		201103090600	\$277.00	\$5,550.00
	01		201103090600	\$2,775.00	\$5,550.00
	02		201103090600	\$2,333.00	\$3,500.00
	02		201103090600	\$5,550.00	\$5,550.00
	03		201103090600	\$693.00	\$5,550.00
	01		201103090600	\$2,775.00	\$5,550.00
	01		201103090600	\$2,775.00	\$5,550.00
	01	CR	201103090600	\$2,100.00	\$4,200.00
	04		201103090600	\$2,650.00	\$5,300.00
	01		201103090600	\$3,468.00	\$5,550.00
	01		201103090600	\$2,775.00	\$5,550.00
	01		201103090600	\$3,700.00	\$5,550.00
	01		201103090600	\$2,775.00	\$5,550.00
	01		201103090600	\$2,775.00	\$5,550.00
	01		201103090600	\$2,775.00	\$5,550.00
	03		201103090600	\$4,400.00	\$4,400.00
	01		201103090600	\$2,775.00	\$5,550.00
	01		201103090600	\$3,700.00	\$5,550.00
	01		201103090600	\$2,600.00	\$5,200.00
	01		201103090600	\$3,700.00	\$5,550.00
	01		201103090600	\$5,550.00	\$5,550.00
	01		201103090600	\$3,468.00	\$5,500.00
	01		201103090600	\$1,150.00	\$2,300.00
	04		201103090600	\$5,100.00	\$5,100.00
	02		201103090600	\$2,775.00	\$5,550.00
	04		201103090600	\$3,700.00	\$3,700.00
	02		201103090600	\$2,345.00	\$5,500.00
	01		201103090600	\$3,468.00	\$5,550.00
	03		201103090600	\$5,550.00	\$5,550.00
	01		201103090600	\$2,775.00	\$5,550.00
	01		201103090600	\$4,700.00	\$4,700.00
	04		201103090600	\$3,750.00	\$4,000.00
	03		201103090600	\$2,775.00	\$5,550.00
	02		201103090600	\$2,775.00	\$5,550.00
	01		201103090600	\$2,775.00	\$5,550.00
	01	PO	201103090600	\$5,550.00	\$5,550.00
	01		201103090600	\$2,775.00	\$5,550.00
	01		201103090600	\$2,775.00	\$5,550.00
	02		201103090600	\$3,200.00	\$3,200.00
01		201103090600	\$5,550.00	\$5,550.00	
01		201103090600	\$2,775.00	\$5,550.00	
03		201103090600	\$2,858.00	\$5,550.00	
02		201103090600	\$2,775.00	\$5,550.00	
01		201103090600	\$5,550.00	\$5,550.00	
03		201103090600	\$2,775.00	\$5,550.00	
02		201103090600	\$3,468.00	\$5,550.00	
01		201103090600	\$5,550.00	\$5,550.00	
03		201103090600	\$5,550.00	\$5,550.00	
02		201103090600	\$5,550.00	\$5,550.00	
02		201103090600	\$2,500.00	\$5,000.00	
01		201103090600	\$1,000.00	\$2,000.00	
02		201103090600	\$3,468.00	\$5,500.00	
01		201103090600	\$5,550.00	\$5,550.00	

Response to Finding #11

Availability of Fiscal Records: Because the audit was conducted at a time when several key staff members were unavailable, I was overwhelmed in trying to provide all of the documentation that was asked for by the audit team. The fiscal records of the school are maintained for the most part by external accountants and I was unable to retrieve this information at the time of the audit.

Enclosed for your review are the bank statement of our account for Title IV funds, the G/L related to these transactions, the records of the student accounts covered by the review and the FSA program reconciliation reports for the award years in question. If there are additional records required to further prove our compliance. We disagree with the assertion of this particular finding and assert that we are in compliance with all rules and regulations contained in 34 C.F. R. 668.24 related to availability of fiscal records.

Final Program Review Determination
PRCN #: 201130427693

Appendix C

Estimated Actual Loss Calculation

Institution Name
 OPE ID
 Appendix [] - Estimated Loss Formula

Estimated Loss Formula

8/29/2012

Enter Institution Name Cobb Beauty College

Select Institution Type Proprietary 2 Yrs or Less

	Select Type of Loan	Select Award Year	Enter Ineligible Loan Amount	Enter School CDR	Total Subsidy Costs	Estimated Loss Liability
1	DL Subsidized	2009-2010	\$ 3,500.00	3.10%	-1.73%	\$ -
2	DL Subsidized	2010-2011	\$ 4,500.00	3.10%	7.27%	\$ 327.02
3	DL Unsubsidized	2010-2011	\$ 4,600.00	3.10%	-17.55%	\$ -
	Description		\$ 12,600.00			\$ 327.02
4						
5						
6						
	Description		\$ -			\$ -
7						
8						
9						
	Description		\$ -			\$ -
10						
11						
12						
	Description		\$ -			\$ -
Original Ineligible Loan Liability			\$ 12,600.00	Total Estimated Loss		\$ 327.02

Institution Name

OPE ID

Appendix [] - Estimated Loss Formula

To calculate estimated loss for a given ineligible loan amount, that amount is multiplied by the total subsidy rates calculated for the ineligible loans. Consolidation Loans will be obtained in the future to prepay some of the ineligible loans; the amount of Consolidation Loans divided by the ineligible Stafford/PLUS loans equals the "Consolidation prepayment rate" (H) for those loans.

The Department's Budget Office calculates, on an annual basis, the rate per dollar of loan of default subsidies (DSRs) and all other subsidies (OSRs) (D & F) for Stafford and PLUS Loans, by cohort year, program, loan type, and risk group (note that 2008-2010 FFEL loan costs are calculated only by cohort year).

	A	B	C	D	E	F	G	H	I	J
	School CDR	Sector CDR*	Ratio **	DSR ***	Adjusted DSR	OSR ***	Avg Cons Year	Cons Prepay %	Cons DSR ***	Cons OS ***
1	3.10%	14.49%	0.21	7.67%	1.61%	-3.76%	2017	21.1%	2.99%	-1.02%
2	3.10%	14.49%	0.21	6.28%	1.32%	5.00%	2018	21.1%	3.19%	1.30%
3	3.10%	14.49%	0.21	8.76%	1.84%	-19.94%	2018	23.0%	3.39%	-1.02%

4										
5										
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12										

Federal Student Aid (FSA) calculates the cohort default rates (CDRs) of the institution (A), and the average CDR for the sector for that institution (B). FSA applies the CDR comparison ratio (C), $[A/B = C]$ against the Budget Office's cohort loan DSR (D) to determine the default subsidy rate for the institution (E). The Budget Office estimates the default subsidy rate and other subsidy rate for the Consolidation Loans that will prepay some of these Stafford and PLUS Loans (I & J).

The total subsidy rate for the ineligible Stafford and PLUS Loans is $((E+F) + ((I+J) \times H))$.

The total subsidy cost for these loans is the ineligible loan amount multiplied by the total subsidy rate.

Final Program Review Determination
PRCN #: 201130427693

Appendix D
Cost of Funds

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

Institution: Cobb Beauty College

City, State: Kennesaw, GA

PRCN: 130427693

TIN: 581414017

DUNS: 024458150

Reviewer: Sherry Blackman

Region: Atlanta

Date: 01/24/2013

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		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	Principal		4253XNOYR	53020 or 53010
	Interest	\$327.00	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	Program / Award Year	Principal	Amount	Funding Code	Object Class	G5 Program Award # *
Pell, ACG, SMART, TEACH	Program / Award Year 2009-2010	Principal	\$5,300.00	3875FNOYR	69020	P063091445
	Program / Award Year 2009-2010	Imputed Interest	\$109.00	1435RNOYR	64020	
	Program/Award Year 2010-2011	Principal	\$7,445.00	3875FNOYR	69020	P063101445
	Program/Award Year 2010-2011	Imputed Interest	\$120.00	1435RNOYR	64020	

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.