



August 26, 2014

Ronald C. Richard, Jr.
President
Crescent City School of Gaming & Bartending
209 North Broad Street
New Orleans, LA 70119-5507

Certified Mail
Return Receipt Requested
7011 2970 0002 0468 5859

RE: Expedited Final Program Review Determination Letter
OPE ID: 03010400
PRCN: 201440628720

Dear Mr. Richard:

From July 28, 2014 through August 1, 2014, Ms. Brittny Stubblefield and Mr. Bruce Anderson conducted a review of Crescent City School of Gaming & Bartending's (Crescent City'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 purpose of this Final Program Review Determination Letter is to close the program review.

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

A sample of 15 files was identified for review from the 2013-2014 award year. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for the award year. Appendix A lists the names and social security numbers of the students whose files were examined during the program review.

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. Appendix A was encrypted and sent separately to the institution via e-mail.

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning Crescent City's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures.

Federal Student Aid

An OFFICE of the U.S. DEPARTMENT of EDUCATION

School Participation Division – Dallas

1999 Bryan Street, Suite 1410, Dallas, TX 75201

Furthermore, it does not relieve Crescent City of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

The issuance of this Final Program Review Determination letter does not preclude the Department from conducting additional testing for any area of non-compliance identified herein in a subsequent program review or compliance audit for the award years included in the scope of this program review.

The Dallas School Participation Division has made a Final Program Review Determination concerning the findings that were identified during the program review. Following is a discussion of the findings identified and the resolution of those findings.

Program Findings and Final Program Review Determinations:

Finding 1 Consumer Information – Return to Title IV (R2T4) Policy Not Published

Citation: Institutions are required to have a R2T4 policy that clearly outlines the requirements for the treatment of Title IV, HEA funds when a student withdraws. The policy must identify the process for officially withdrawing from the school as well as a summary of the requirements for returning funds, including but not limited to, the effects of withdrawing, post-withdrawal disbursement information, how the institution will determine the withdrawal date for students who unofficially withdraw, and the timeframe and order for the return of funds. *34 C.F.R. §§ 668.16(h) and 668.22*

The policy must be readily available to enrolled and prospective students and include a summary of the requirements for the return of Title IV grant or loan assistance. *34 C.F.R. § 668.43(a)(4)*

Noncompliance: Crescent City had an R2T4 policy; however, it was not made readily available in the student catalog or consumer information given to students.

Institutional Action Taken to Resolve Noncompliance: Crescent City added the policy as an addendum to their catalog until the school is able to republish the catalog.

Final Program Review Determination: Crescent City resolved the finding during the program review. Therefore, Crescent City may consider this finding closed, with no further action required.

Finding 2 Student Status – Untimely Reporting

Citation: All institutions participating in the Title IV programs *must* have some arrangement to report student enrollment data to the National Student Loan Data System (NSLDS). Regulations state that an institution must, upon receipt of a student status confirmation report from the Secretary, complete and return that report to the Secretary within 30 days of receipt. And, unless the institution expects to submit its next student status confirmation report to the Secretary within the next 60 days, notify the Secretary within 30 days if it discovers that a Direct Subsidized, Direct Unsubsidized, or Direct PLUS Loan has been made to or on behalf of a student who enrolled at that school but has ceased to be enrolled on at least a half-time basis; has been

accepted for enrollment at that school but failed to enroll on at least a half-time basis for the period for which the loan was intended; or has changed his or her permanent address. 34 C.F.R. § 685.309(b)

Noncompliance: During the 2013-2014 award year, enrollment status reporting was untimely for student # 14. The student's last date of attendance was 1/24/14, but the certification date was 6/13/14. Based upon observations made by the review team during the program review, it appeared that the reporting error may have been due to an input error.

Institutional Action Taken to Resolve Noncompliance: To prevent the occurrence of this finding in the future, Crescent City has agreed to report changes in enrollment for students participating in the Direct Loan Program in a timely manner according to institutional policy.

Final Program Review Determination: Crescent City concurred with the finding and will adhere to the institutional reporting policy for reporting changes in enrollment status. Crescent City's administrative staff will comply with the SSCR Reporting policy for the timely submissions of changes in enrollment status to NSLDS. Therefore, Crescent City may consider this finding closed, with no further action required.

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. If you have any questions concerning this report, please call Brittny Stubblefield at (214) 661-9481.

Sincerely,

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Cynthia Thornton, Director
Dallas School Participation Division

cc: Brenda Constantine, Financial Aid Administrator

Appendix A: Student Sample (sent via e-mail)