



August 18, 2014

Dr. Julie E. Wollman  
President  
Edinboro University of Pennsylvania  
219 Meadville Street  
Edinboro, PA 16444-0001

*Sent via UPS 2<sup>nd</sup> Day Air*  
*Tracking: 1ZA879640299979279*

RE: **Final Program Review Determination**  
OPE ID: 00332100  
PRCN: 201330328318

Dear Dr. Wollman:

The U.S. Department of Education's (Department's) School Participation Division – Philadelphia issued a program review report on September 03, 2013 covering Edinboro University of Pennsylvania's (Edinboro's) self-reported noncompliance issue related to the 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), for the 2001-2002 through 2010-2011 award years. Edinboro's final response was received on September 19, 2013. A copy of the program review report (and related attachments) and Edinboro's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by Edinboro upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

**Purpose:**

Final determinations have been made concerning all of the outstanding findings of the program review report. The purpose of this letter is to close the 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. To protect PII, the attached report does not contain any student PII. Selected sections of FPRD Appendix A, Program Review Report, contain student PII and will be emailed to the institution as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file will be sent in a separate email.

**Federal Student Aid**

An OFFICE of the U.S. DEPARTMENT of EDUCATION  
School Participation Division – Philadelphia

100 Penn Square East, Suite 511, Philadelphia, PA 19107

**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 Ms. Bartges at Katherine.Bartges@ed.gov or 215-656-5953.

Sincerely,

(b)(6)

Nancy P. Gifford  
Division Director

cc: Alyssa Dobson, Financial Aid Administrator  
PA State Board of Nursing  
PA Commonwealth System of Higher Education  
PA Department of Education Bureau of Teacher Preparation and Certification  
Middle States Higher Education

**Enclosures:**

Final Program Review Determination Report (FPRD)  
FPRD Appendix A: Program Review Report  
FPRD Appendix B: Institution's Written Response  
FPRD Appendix C: Estimated Actual Loss Calculation  
FPRD Appendix D: Estimated Actual Loss Formula Description

Prepared for

**Edinboro University  
of Pennsylvania**

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**OPE ID: 00332100  
PRCN: 201330328318**

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

# Final Program Review Determination August 18, 2014

The Wanamaker Building  
100 Penn Square East, Suite 511  
Philadelphia, PA 19107  
StudentAid.gov

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**A. Institutional Information**

Edinboro University of Pennsylvania  
219 Meadville Street  
Edinboro, PA 16444-0001

Type: Public

Highest Level of Offering: Master's Degree

Accrediting Agency: Middle States Higher Education

Undergraduate Current Student Enrollment: 5,493 (Spring 2013)  
% of Students Receiving Title IV: 80.9 % (Spring 2013)

Graduate Current Student Enrollment: 1,267 (Spring 2013)  
% of Students Receiving Title IV: 60.6 % (Spring 2013)

Title IV Participation 2011-2012: (as of May 30, 2013):

William D. Ford Federal (Direct Loan) Program	\$ 58,695,270
Federal Perkins Loan Program	\$ 240,931
Federal Pell Grant Program	\$ 12,215,776
Federal TEACH Program	\$ 165,000
Federal SEOG Program	\$ 259,325
Federal Work Study Program	\$ 426,128

Default Rate FFEL/DL:

2010: 5.5 % (123 in default; 2,198 in repayment)  
2009: 5.3 % (113 in default; 2,095 in repayment)  
2008: 4.4 % (91 in default; 2,059 in repayment)

Default Rate Perkins:

2012: 25.7 % (36 in default; 140 in repayment)  
2011: 19.9 % (28 in default; 141 in repayment)  
2010: 20.0 % (39 in default; 195 in repayment)

## **B. Scope of Review**

The U.S. Department of Education (the Department) conducted an off-site program review of Edinboro University of Pennsylvania (Edinboro) from June 24, 2013 through June 28, 2013. The review was conducted by Ms. Katherine Bartges and Ms. Nancy Della Vecchia.

The focus of the review was program eligibility, specifically the five ineligible post-master's licensure preparation programs for which Title IV aid was disbursed from the 2001-2002 award year through the 2010-2011 award year. The institution self-reported its internal discovery of this noncompliance issue to the Department in November 2012. The review consisted of an examination of Edinboro's eligibility history and the institution's Title IV disbursement records for students enrolled in one of the five ineligible programs.

A program review report was issued on September 03, 2013. Appendix A of the program review report lists the names, social security numbers and Title IV disbursements for all Title IV recipients enrolled in one of the five ineligible graduate programs examined during the program review.

### **Disclaimer:**

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

## **C. Finding and Final Determination**

The program review report finding is summarized below. At the conclusion of the finding is a summary of Edinboro's response to the finding, and the Department's final determination for that finding. A copy of the program review report issued on September 03, 2013 is attached as Appendix A.

### **Finding 1: Title IV Funds Disbursed to Students Enrolled in Ineligible Programs**

#### **Noncompliance:**

A student is eligible for Title IV funding if they are enrolled in an eligible program at an eligible institution. 34 C.F.R. § 668.32. An educational program must meet several Title IV requirements in order for students in that program to be eligible for Title IV funding. See 34 C.F.R. § 668.8. Among other applicable requirements, an eligible program provided by an institution of higher education must lead to an associate, bachelor's,

professional or graduate degree; or be at least a one-academic-year training program that leads to a certificate, or other non-degree recognized credential, and prepare students for gainful employment in a recognized occupation. 34 C.F.R. §§ 668.8(c)(1),(3).

An institution that wishes to establish its eligibility to participate in any Title IV, HEA program must submit an application to the Secretary of Education, as well as documentation of state licensure and accreditation, in order to enable the Secretary to determine if the institution satisfies all certification requirements. 34 C.F.R. § 600.20(a). Once the Secretary receives and approves such an application, the Secretary will notify the institution of its eligibility and of the locations and educational programs that qualify as eligible. 34 C.F.R. § 600.20(e).

**Noncompliance Summary:**

Edinboro awarded and disbursed Title IV funds to ineligible students enrolled in the following ineligible post-master's licensure preparation programs:

Student Personnel Services (Major Code 8901);  
Rehabilitation Counseling (Major Code 8902);  
Community Counseling (Major Code 8903);  
Elementary Guidance (Major Code 8904); and  
Secondary Guidance (Major Code 8905).

These post-master's licensure preparation programs do not lead to a degree, nor do they lead to a certificate or other non-degree recognized credential as required by the Title IV definition of an eligible program. Consequently, the students enrolled in these programs are not eligible for Title IV assistance. See 34 C.F.R. §§ 668.8(c)(1), (3); 668.32.

The institution made a total of 65 ineligible Federal Stafford Loan disbursements to 25 ineligible students enrolled in the ineligible post-master's licensure preparation programs from the 2001-2002 award year through the 2010-2011 award year. According to institutional records, Edinboro disbursed a total of \$199,378.37 in Federal Stafford Loan funds to ineligible students.

Edinboro self-reported its ineligible programs to the Department, and informed the Department of the Federal Stafford Loan disbursements made to ineligible students. The institution stated that it conducted a thorough full file review of all students enrolled in the ineligible post-master's licensure preparation programs from the 2001-2002 award year through the 2010-2011 award year, and provided the disbursement-level results of its file review to the Department on November 07, 2012.

**Directives From Program Review Report:**

Edinboro was required to verify that its file review results spreadsheet, as provided to the Department on November 07, 2012, included all students enrolled in the five ineligible post-master's licensure preparation programs for whom the institution disbursed Title IV funds. The institution was required to identify any errors, discrepancies or omissions, to the Department with its response to the program review report.

The institution was also required to communicate the post-master's licensure preparation programs' accurate Title IV eligibility status to all relevant university faculty and staff. Additionally, Edinboro was required to review both its printed and electronic materials containing Title IV-related information about the ineligible programs, and make any necessary adjustments to its student-facing consumer information materials to ensure that it accurately represents the Title IV eligibility status of these programs. Edinboro was required to provide documentation of its corrective actions concerning this section with its response to this program review report.

**Final Determination:**

Edinboro provided its response to the program review report to the Department on September 19, 2013. In its response, the institution stated that it concurred with the Department's finding and that it reviewed and confirmed the accuracy and completeness of the list of students and ineligible disbursements, attached to the program review report as Appendix A. Edinboro also stated that it has instituted policies and taken actions which address the required action section of the Department's program review report.

In its response, the institution reported that Edinboro initiated a Curriculum, Eligibility and Compliance Committee to ensure campus-wide compliance with all rules and regulations regarding the administration of Title IV aid. The institution provided a description of the committee, which includes committee members and positions, meeting frequency and the purpose of the committee. The committee description details that the committee is comprised of leadership individuals from all areas of the University to ensure that the campus as a whole is informed of changes in eligibility as well as any new policy that may arise.

Edinboro's written response reported the institution's actions taken to address the representation of its post-master's licensure preparation programs to the Department, campus community and within the institution's internal systems. In its response, the institution states that all certificate programs are accurately presented in Edinboro's ECAR, and that the institution's post-master's licensure programs identified in the program review report have been correctly coded in Edinboro's financial aid management system, Banner, to prevent students in these programs from receiving Title IV funds. The institution provided a copy of its current ECAR with its response.

In its response, the institution also reported that it thoroughly reviewed all of its printed and online materials to ensure the information available to Edinboro's students, faculty and staff is accurate and is provided in accordance with federal regulations. The institution stated that the Curriculum, Eligibility and Compliance Committee will communicate eligibility changes and policy updates to other campus constituents to ensure accurate delivery and presentation of information to students and faculty. Edinboro provided its catalogs and other published materials to the Department prior to the start of the Department's program review.

The Department reviewed Edinboro's September 19, 2013 narrative response as well as the supporting documentation it submitted with its response to the program review report. The Department based its final determination upon the institution's September 19, 2013 response submission. Due to the length of time that has elapsed, the Department will only calculate the estimated actual loss of funds disbursed for the 2007-2008 through 2010-2011 award years.

The total amount of FFEL and Direct Loan funds (Subsidized and Unsubsidized) disbursed to 10 ineligible students enrolled in the five ineligible post-master's licensure preparation programs listed in Finding 1 during the 2007-2008, 2008-2009, 2009-2010 and 2010-2011 award years is \$94,531.72. The estimated actual loss to the Department that has resulted or will result from those ineligible loans is based on Edinboro's cohort default rates applicable to the award years identified in Finding 1 of the Department's September 03, 2013 program review report.

As a result, the estimated actual loss the Department has determined for the ineligible loans disbursed during the 2007-2008, 2008-2009, 2009-2010 and 2010-2011 award years is \$217.31. A copy of the results of that calculation is included as Appendix C. Since the total liability amount owed to the Department is minimal (less than \$1,000), a receivable is not being established with the Department's Accounts Receivable Group. However, Edinboro remains responsible, in its role as a fiduciary for Title IV, HEA federal funds, to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

#### **D. Appendices**

Selected sections of Appendix A, Program Review Report, contain personally identifiable information and will be emailed to the institution as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file will be sent in a separate email.

Final Program Review Determination  
PRCN: 201330328318

Appendix A  
Program Review Report

Prepared for

Edinboro University of  
Pennsylvania

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**OPE ID: 00332100**  
**PRCN: 201330328318**

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

## Program Review Report

September 03, 2013

The Wanamaker Building, 100 Penn Square East, Suite 511  
Philadelphia, PA 19107  
StudentAid.gov

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**A. Institutional Information**

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Type: Public

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Federal SEOG Program	\$ 259,325
Federal Work Study Program	\$ 426,128

**Default Rate FFEL/DL:**

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## **B. Scope of Review**

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The focus of the review was program eligibility, specifically the five ineligible post-master's licensure preparation programs for which Title IV aid was disbursed from the 2001-2002 award year through the 2010-2011 award year. The institution self-reported its internal discovery of this noncompliance issue to the Department in November 2012. The review consisted of an examination of Edinboro's eligibility history and the institution's Title IV disbursement records for students enrolled in one of the five ineligible programs.

Appendix A lists the names, social security numbers and Title IV disbursements for all Title IV recipients enrolled in one of the five ineligible graduate programs examined during the program review.

### **Disclaimer:**

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning Edinboro'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 Edinboro 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 Edinboro to bring operations of the financial aid programs into compliance with the statutes and regulations.

### **Finding # 1: Title IV Funds Disbursed to Students Enrolled in Ineligible Programs**

#### **Citation:**

An eligible program is an educational program that is provided by a participating institution; and satisfies all relevant requirements contained in 34 C.F.R. § 668.8, Student Assistance General Provisions, Subpart A, Eligible Program. 34 C.F.R. § 668.8(a).

Among other applicable requirements, an eligible program provided by an institution of higher education must lead to an associate, bachelor's, professional or graduate degree; or be at least a one-academic-year training program that leads to a certificate, or other non-degree recognized credential, and prepare students for gainful employment in a recognized occupation. 34 C.F.R. § 668.8(c)(1)&(3).

An institution that wishes to establish its eligibility to participate in any Title IV, HEA program must submit an application to the Secretary of Education, as well as documentation of state licensure and accreditation, in order to enable the Secretary to determine if the institution satisfies all certification requirements. 34 C.F.R. § 600.20(a). Once the Secretary receives and approves such an application, the Secretary will notify the institution of its eligibility and of the locations and educational programs that qualify as eligible. 34 C.F.R. § 600.20(e). The eligible non-degree programs offered by the institution are then specifically named on the Department's approval notice to the school, the ECAR.

The ECAR establishes the parameters within which an institution may use Title IV funds. The ECAR lists the eligible non-degree programs by name, and identifies the number of credit and clock hours in each program, the type of credit hours used (if applicable), and the duration of the program in terms of the number of weeks. The Department thus approves specific educational programs for participation.

An eligible institution must notify the Secretary at least 90 days before the first day of class when it intends to add an educational program that prepares students for gainful employment in a recognized occupation, as provided under 34 CFR 668.8(c)(3), which defines the Department's requirements for program eligibility. 34 C.F.R. § 600.10(c)(1).

**Noncompliance:**

Edinboro awarded and disbursed Title IV funds to ineligible students enrolled in the following ineligible post-master's licensure preparation programs:

Student Personnel Services (Major Code 8901);  
Rehabilitation Counseling (Major Code 8902);  
Community Counseling (Major Code 8903);  
Elementary Guidance (Major Code 8904); and  
Secondary Guidance (Major Code 8905).

The post-master's licensure preparation programs listed above do not lead to a degree, nor do they lead to a certificate or other non-degree recognized credential; therefore, these programs do not meet the Department's requirements for a eligible program as presented in 34 C.F.R. § 668.8(c)(1)&(3).

The institution made a total of 65 ineligible Federal Stafford Loan disbursements to 25 ineligible students enrolled in the ineligible post-master's licensure preparation programs from the 2001-

2002 award year through the 2010-2011 award year. According to institutional records, Edinboro disbursed a total of \$ 199,378.37 in Federal Stafford Loan funds to ineligible students.

Edinboro self-reported its ineligible programs to the Department, and informed the Department of the Federal Stafford Loan disbursements made to ineligible students. The institution expressed its understanding that Edinboro's disbursing Title IV aid for these ineligible programs was not compliant with federal regulations. The institution stated that it conducted a thorough full file review of all students enrolled in the ineligible post-master's licensure preparation programs, and provided the disbursement-level results of its file review to the Department on November 07, 2012. A modified version of the institution's file review results spreadsheet is included attached to this program review report as Appendix A.

**Required Action:**

Edinboro must verify that its file review results spreadsheet, as provided to the Department on November 07, 2012, includes all students enrolled in the five ineligible post-master's licensure preparation programs for whom the institution disbursed Title IV funds. If the institution finds any errors, discrepancies or omissions, Edinboro is required to revise its spreadsheet with the necessary corrections and re-submit it to the Department with its response to this program review report. If the institution has any additional information it would like the Department to consider before making a final determination, Edinboro should include this information with its response. The Department will provide its determination of any liabilities in its final program review determination.

The institution must communicate the post-master's licensure preparation programs' accurate Title IV eligibility status to all relevant university faculty and staff. Edinboro must also review both its printed and electronic materials containing Title IV-related information about the ineligible programs, and make any necessary adjustments to its student-facing consumer information materials to ensure that it is accurately represents the Title IV eligibility status of these programs. If the institution has completed these steps prior to the issuance of this program review report, it may provide material to document its actions concerning this section with its response to this program review report.

**D. Appendices**

Appendix A contains personally identifiable information and will be emailed to Edinboro as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file will be sent in a separate email.

Edinboro University of Pennsylvania  
OPE ID: 00332100  
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**Appendix A: File Review Results Spreadsheet**

Source: Edinboro University  
Provided to the Department on November 07, 2012

AUDIT Selected Programs and Paid Financial Aid

Award Year	Student ID	Last Name	First Name	SSN	DOB	Major Description	Aid Paid Term	Aid Fund Description	Paid Amount	Date Paid	Current Status of Aid	OPB
0102	(b)(6); (b)(7)(C)					Rehabilitation Counseling	Summer 2002	Fed Stafford Unsubsidized Loan	3,684.00	5/28/2002	Consolidated	
0203						Student Personnel Services	Fall 2002	Fed Stafford Subsidized Loan	478.00	8/16/2002	In repayment	141.00
0203						Student Personnel Services	Fall 2002	Fed Stafford Unsubsidized Loan	2,022.00	9/24/2002	In repayment	657.00
0203						Student Personnel Services	Spring 2003	Fed Stafford Unsubsidized Loan	478.00	1/22/2003	In repayment	0.00
0203						Student Personnel Services	Spring 2003	Fed Stafford Unsubsidized Loan	2,022.00	1/22/2003	In repayment	0.00
0203						Secondary Guidance	Spring 2003	Fed Stafford Unsubsidized Loan	3,323.16	2/13/2003	Consolidated	
0203						Secondary Guidance	Spring 2003	Fed Stafford Unsubsidized Loan	4,122.50	2/13/2003	Consolidated	
0706						Community Counseling	Fall 2007	Fed Stafford Subsidized Loan	3,022.00	8/10/2007	Deferred	2,263.00
0706						Community Counseling	Fall 2007	Fed Stafford Unsubsidized Loan	3,653.00	8/10/2007	Deferred	2,846.00
0708						Community Counseling	Spring 2008	Fed Stafford Subsidized Loan	3,022.00	1/28/2008	Deferred	2,263.00
0708						Community Counseling	Spring 2008	Fed Stafford Unsubsidized Loan	3,653.00	1/28/2008	Deferred	2,846.00
0304						Rehabilitation Counseling	Spring 2004	Fed Stafford Unsubsidized Loan	4,100.00	3/10/2004	Deferred	4,100.00
0304						Secondary Guidance	Summer 2004	Fed Stafford Subsidized Loan	825.00	6/28/2004	Deferred	825.00
0304						Secondary Guidance	Summer 2004	Fed Stafford Unsubsidized Loan	3,275.00	6/28/2004	Deferred	3,275.00
0405						Secondary Guidance	Fall 2004	Fed Stafford Unsubsidized Loan	8,400.00	8/10/2004	Deferred	8,400.00
0405						Secondary Guidance	Spring 2005	Fed Stafford Unsubsidized Loan	8,400.00	1/24/2005	Deferred	8,400.00
0607						Community Counseling	Spring 2007	Fed Stafford Subsidized Loan	2,268.00	2/9/2007	In repayment	2,268.00
0708						Community Counseling	Fall 2007	Fed Stafford Subsidized Loan	4,260.00	8/10/2007	Consolidated	
0708						Community Counseling	Fall 2007	Fed Stafford Unsubsidized Loan	4,800.00	8/10/2007	Consolidated	
0506						Student Personnel Services	Spring 2006	Fed Stafford Subsidized Loan	1,800.00	2/21/2006	Consolidated	
0405						Community Counseling	Spring 2005	Fed Stafford Subsidized Loan	1,575.28	3/10/2005	Consolidated	
0405						Community Counseling	Spring 2005	Fed Stafford Unsubsidized Loan	2,868.71	3/10/2005	Consolidated	
0506						Community Counseling	Spring 2006	Fed Stafford Unsubsidized Loan	1,300.00	3/16/2006	Consolidated	
0607						Community Counseling	Fall 2007	Fed Stafford Unsubsidized Loan	1,728.00	8/14/2008	Consolidated	
0910						Secondary Guidance	Spring 2010	Fed Stafford Subsidized Loan	4,188.26	2/1/2010	In repayment	3,820.00
0708						Student Personnel Services	Spring 2007	Fed Stafford Subsidized Loan	4,250.00	8/14/2007	Deferred	4,250.00
0708						Student Personnel Services	Spring 2007	Fed Stafford Unsubsidized Loan	4,800.00	8/14/2007	Deferred	4,800.00
0708						Student Personnel Services	Spring 2008	Fed Stafford Subsidized Loan	4,250.00	1/28/2008	Deferred	4,250.00
0708						Student Personnel Services	Spring 2008	Fed Stafford Unsubsidized Loan	4,800.00	1/28/2008	Deferred	4,800.00
0304						Student Personnel Services	Spring 2004	Fed Stafford Unsubsidized Loan	3,400.00	1/28/2004	Deferred	3,400.00
0304						Student Personnel Services	Spring 2004	Fed Stafford Unsubsidized Loan	4,260.00	1/28/2004	Deferred	4,260.00
0708						Community Counseling	Spring 2008	Fed Stafford Subsidized Loan	2,267.00	1/30/2008	In repayment	3,844.00
0708						Community Counseling	Spring 2008	Fed Stafford Unsubsidized Loan	4,418.00	1/30/2008	In repayment	8,114.00
0809						Secondary Guidance	Spring 2008	Fed Stafford Unsubsidized Loan	1,775.00	1/31/2008	Deferred	4,181.00
0809						Secondary Guidance	Spring 2008	Fed Stafford Unsubsidized Loan	3,675.00	9/9/2008	Deferred	4,735.00
0708						Community Counseling	Spring 2007	Fed Stafford Unsubsidized Loan	3,675.00	1/27/2008	Deferred	4,735.00
0708						Community Counseling	Fall 2007	Fed Stafford Unsubsidized Loan	1,775.00	12/18/2007	Consolidated	
0708						Community Counseling	Spring 2008	Fed Stafford Unsubsidized Loan	1,775.00	1/28/2008	Consolidated	
0809						Community Counseling	Summer 2008	Fed Stafford Unsubsidized Loan	1,202.85	7/18/2008	Consolidated	
0910						Community Counseling	Fall 2008	Fed Stafford Unsubsidized Loan	3,712.50	10/21/2008	Consolidated	
0910						Community Counseling	Fall 2008	Fed Stafford Unsubsidized Loan	1,072.68	11/17/2008	Consolidated	
0910						Community Counseling	Fall 2008	Fed Stafford Unsubsidized Loan	3,252.48	11/17/2008	Consolidated	
1011						Rehabilitation Counseling	Fall 2010	Fed Dir Unsubsidized Staff Loan	4,868.00	8/13/2010	Loan Originated	4,868.00
1011						Rehabilitation Counseling	Spring 2011	Fed Dir Unsubsidized Staff Loan	4,868.00	1/31/2011	Loan Originated	4,868.00
0304						Rehabilitation Counseling	Summer 2011	Fed Dir Unsubsidized Staff Loan	4,874.00	6/18/2011	Loan Originated	4,898.00
0304						Elementary Guidance	Fall 2003	Fed Stafford Unsubsidized Loan	1,450.00	8/28/2003	Consolidated	
0405						Elementary Guidance	Spring 2004	Fed Stafford Unsubsidized Loan	1,450.00	1/28/2004	Consolidated	
0405						Secondary Guidance	Fall 2004	Fed Stafford Unsubsidized Loan	4,150.00	8/10/2004	Consolidated	
0405						Secondary Guidance	Fall 2004	Fed Stafford Unsubsidized Loan	4,150.00	8/10/2004	Consolidated	
0405						Secondary Guidance	Spring 2005	Fed Stafford Unsubsidized Loan	4,260.00	8/10/2004	Consolidated	
0405						Secondary Guidance	Spring 2005	Fed Stafford Unsubsidized Loan	1,365.00	1/21/2005	Consolidated	
0304						Student Personnel Services	Summer 2004	Fed Stafford Unsubsidized Loan	3,235.00	1/21/2005	Consolidated	
0304						Student Personnel Services	Summer 2004	Fed Stafford Unsubsidized Loan	738.00	6/28/2004	Consolidated	
0506						Student Personnel Services	Spring 2006	Fed Stafford Subsidized Loan	3,371.00	6/28/2004	Consolidated	
0506						Secondary Guidance	Spring 2006	Fed Stafford Subsidized Loan	4,250.00	2/18/2006	Consolidated	
0607						Community Counseling	Spring 2007	Fed Stafford Unsubsidized Loan	4,300.00	2/18/2006	Consolidated	
0607						Community Counseling	Spring 2007	Fed Stafford Unsubsidized Loan	4,976.00	2/6/2007	Consolidated	

0607	(b)(6), (b)(7)(C)	Community Counseling	Summer 2007	Fed Stafford Unsubsidized Loan	1,326.00	6/29/2007	Consolidated
1011		Student Personnel Services	Fall 2010	Fed Dir Unsubsidized Staff Loan	1,892.00	9/14/2010	Forebearance
0304		Elementary Guidance	Summer 2004	Fed Dir Subsid Stafford Loan	3,017.00	9/14/2010	Forebearance
0405		Elementary Guidance	Fall 2004	Fed Stafford Unsubsidized Loan	3,209.00	6/29/2004	Consolidated
0607		Elementary Guidance	Fall 2004	Fed Stafford Unsubsidized Loan	347.00	9/27/2004	Consolidated
0708		Community Counseling	Spring 2007	Fed Stafford Unsubsidized Loan	1,163.00	1/29/2007	In repayment
0304		Rehabilitation Counseling	Fall 2007	Fed Stafford Unsubsidized Loan	4,250.00	6/10/2007	In repayment
			Summer 2004	Fed Stafford Unsubsidized Loan	1,776.00	6/29/2004	Consolidated
				Fed Stafford Unsubsidized Loan	2,028.00		

Total: 199,376.37  
 Total Loan Records: 86  
 Unduplicated Records: 25

\*Amount of OPB can't be readily determined as this disbursement is part of a larger loan. This student changed major to the ineligible licensure in the middle of an academic year. One disbursement was for an eligible program and the other was for the licensure program.

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## Appendix C

### Estimated Actual Loss Calculation

**Estimated Loss Formula**

9/16/2013

Enter Institution Name Edinboro University of Pennsylvania

Select Institution Type 4 Yr

	Select Type of Loan	Select Award Year	Enter Ineligible Loan Amount	Enter School CDR	Total Subsidy Costs	Estimated Loss Liability
1	DL Subsidized	2010-2011	\$ 3,017.00	7.20%	3.63%	\$ 109.58
2	DL Unsubsidized	2010-2011	\$ 16,463.00	7.20%	-31.36%	\$ -
3						
	<b>DL SUB / UNSUB</b>		\$ 19,480.00			\$ 109.58
4	FFEL Subsidized	2009-2010	\$ 7,438.71	7.20%	0.91%	\$ 67.73
5	FFEL Subsidized	2008-2009	\$ 3,712.50	5.50%	1.08%	\$ 40.00
6	FFEL Subsidized	2007-2008	\$ 21,051.00	5.30%	-0.16%	\$ -
	<b>FFEL SUB</b>		\$ 32,202.21			\$ 107.73
7	FFEL Unsubsidized	2009-2010	\$ 1,072.66	7.20%	-6.87%	\$ -
8	FFEL Unsubsidized	2008-2009	\$ 7,350.00	5.50%	-10.08%	\$ -
9	FFEL Unsubsidized	2007-2008	\$ 34,426.85	5.30%	-17.48%	\$ -
	<b>FFEL UNSUB</b>		\$ 42,849.51			\$ -
10						
11						
12						
			\$ -			\$ -
	<b>Original Ineligible Loan Liability</b>		\$ 94,531.72	<b>Total Estimated Loss</b>		\$ 217.31

Edinboro University of Pennsylvania

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FPRD Appendix C

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	7.20%	7.78%	0.93	0.69%	0.64%	-0.04%	2017	31.8%	2.02%	7.52%
2	7.20%	7.78%	0.93	1.64%	1.53%	-33.31%	2017	40.1%	2.52%	-1.48%
3										
4	7.20%	7.78%	0.93	0.02%	0.02%	0.16%	2015	19.4%	2.48%	1.29%
5	5.50%	7.78%	0.71	0.07%	0.05%	-0.41%	2014	21.2%	2.41%	4.36%
6	5.30%	7.78%	0.68	0.32%	0.22%	-1.59%	2013	22.2%	2.65%	2.79%
7	7.20%	7.78%	0.93	0.00%	0.00%	-4.83%	2015	28.7%	2.83%	-9.93%
8	5.50%	7.78%	0.71	0.07%	0.05%	-8.00%	2015	31.3%	3.12%	-9.93%
9	5.30%	7.78%	0.68	0.28%	0.19%	-16.77%	2014	32.8%	2.99%	-5.74%
10										
11										
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.

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## Appendix D

### Estimated Actual Loss Formula Description



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FPRD Appendix D - Estimated Actual Loss Formula Description

NOTE: The number of days of 774 for this time period is doubled to 1548 (451+730+367) because the principal amount is divided by two.

Similar calculations are made for the other two periods. The total liability is the sum of the default amount with the interest and special allowance calculations for all three periods.