

Index Sheet

Ope Id No: 03374300

School Name: FLORIDA COASTAL SCHOOL OF LAW

Subfolder: Program Review/FPRD

Doc Type: FPRD with Attachments

Rec Date:

Org Date:

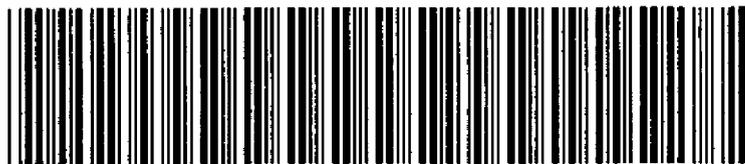
School Year: 2012

ACN:

PRCN: 201240428019

Box ID: 1434

Unique ID: SC1000000804403





January 15, 2013

Mr. C. Peter Goplerub III
President
Florida Coastal School of Law
8787 Baypine Road
Jacksonville, FL 32256

UPS – Next Day Air
Tracking #1ZA5467Y0191984430

RE: **Final Program Review Determination**
OPE ID: 03374300
PRCN: 201240428019

Dear Mr. Goplerub:

The U.S. Department of Education's (Department's) School Participation Division - Atlanta issued a program review report on October 30, 2012 covering Florida Coastal School of Law's (Florida Coastal's) administration of 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 2011 and 2012 award years. The institution's final response was received on November 28, 2012.

The School Participation Division - Atlanta has reviewed Florida Coastal's response to the Program Review Report. A copy of the program review report (and related attachments) and Florida Coastal's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by Florida Coastal 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.

Florida Coastal's response has resolved all findings. In addition, Florida Coastal has provided assurances that the appropriate corrective actions have been taken to resolve and prevent future occurrences of all findings. Therefore, Florida Coastal may consider the program review closed with no further action required.

Program records relating to the period covered by this program review must be retained until the later of: the resolution of the loan(s), claim(s) or expenditure(s) questioned in the program review [34 C.F.R. § 668.24(e)(3)(i)] or the end of the retention period applicable to the record [34 C.F.R. § 668.24(e)(1) and (e)(2)].

Federal Student Aid

An OFFICE of the U.S. DEPARTMENT of EDUCATION

Atlanta School Participation Division
830 First Street, NE, 7th Floor, Washington, DC 20202

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If you have any questions regarding this letter, please contact LaTonya Nesbitt at (202) 377-3210.

(b)(6)



Charles L. Engstrom
Division Director

Enclosure:
Program Review Report (with attachments)
Florida Coastal's Response to the Program Review Report

cc: Mr. Roger A. Collins, Financial Aid Director
FL Commission for Independent Education – Florida Department of Education
American Bar Association

Final Program Review Determination
PRCN #: 201240428019

Florida Coastal's Program Review Report



October 30, 2012

Mr. C. Peter Goplerub III
President
Florida Coastal School of Law
8787 Baypine Road
Jacksonville, FL 32256

UPS – Next Day Air
Tracking #1ZA5467Y0194712343

RE: **Program Review Report**
OPE ID: 03374300
PRCN: 201240428019

Dear Mr. Goplerub:

From August 13, 2012 through August 17, 2012, LaTonya Nesbitt and Andrew Lawrence conducted a review of Florida Coastal School of Law's (Florida Coastal'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 Florida Coastal. The response should include a brief, written narrative for each finding that clearly states Florida Coastal's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, Florida Coastal 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;

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
AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

Atlanta School Participation Division
830 First Street, NE, 7th Floor
Washington, DC 20202

- (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.

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 Florida Coastal 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 LaTonya Nesbitt of this office within 30 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. Appendix A was given to Florida Coastal in the entrance conference held on August 13, 2012. Appendix A can be encrypted and sent separately to the institution via e-mail. 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.

Florida Coastal School of Law
• OPE ID Number: 03374300
• PRCN Number: 201240428019
Page 3 of 3

If you have any questions concerning this report, please contact LaTonya Nesbitt at (202) 377-3210 or LaTonya.Nesbitt@ed.gov.

Sincerely,

(b)(6)

Christopher Miller
Compliance Manager

cc: Mr. Roger A. Collins, Financial Aid Director

Enclosure:
Protection of Personally Identifiable Information

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

PROUD SPONSOR of
the AMERICAN MIND™

Prepared for
Florida Coastal School of Law

OPE ID: 03374300
PRCN: 201240428019

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

Program Review Report

October 30, 2012

Table of Contents

Table of Contents

- A. Institutional Information
- B. Scope of Review
- C. Findings
 - Finding 1. Untimely Return of Title IV (R2T4) Calculation
 - Finding 2. Failure to Reconcile Direct Loan Discrepancies Between G5, COD and Institutional General Ledgers for 2011-2012
 - Finding 3. Inaccurately Reporting Disbursement Information to COD
 - Finding 4. Return of Title IV Policy – Missing Components
 - Finding 5. Verification Policy – Missing Components
 - Finding 6. Satisfactory Academic Progress Policy – Missing Components
 - Finding 7. Campus Security - Missing Required Policies and Statements
- D. Appendices
 - Appendix A: Student Sample
 - Appendix B: Instructions for Encrypting Files

Florida Coastal School of Law
OPE ID: 03374300
PRCN: 201240428019
Page 2

A. Institutional Information

Florida Coastal School of Law
8787 Baypine Road
Jacksonville, FL 32256-8528

Type: Proprietary

Highest Level of Offering: First Professional Degree

Accrediting Agency: American Bar Association

Current Student Enrollment: 1721 (as of Spring 2012)

% of Students Receiving Title IV: 85% (as of Spring 2012)

Title IV Participation (G5):

2011-2012

Federal Direct Loan (DL)

\$76,011,306.00

Default Rate FFEL/DL: 2009 - 1.7%
2008 - 1.6%
2007 - 1.0%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Florida Coastal School of Law (Florida Coastal) from August 13, 2012 to August 17, 2012. The review was conducted by LaTonya Nesbitt and Andrew Lawrence.

The focus of the review was to determine Florida Coastal'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 Florida Coastal's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, return of Title IV calculations, and Title IV credit balances.

A sample of 30 files was identified for review from the 2011 and 2012 (year to date) award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the names and social security numbers of the students whose files were examined during the program review.

Disclaimer:

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

Finding 1. Untimely Return of Title IV (R2T4) Calculation

Citations:

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 668.22. 34 C.F.R. § 668.22(a), General Provisions.

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. 34 C.F.R. § 668.22(e), General Provisions.

Noncompliance:

In reviewing student #13's attendance records and academic transcript, it was determined that the student's last date of attendance was 11/15/2010. Student #13 withdrew during the payment period that started on 8/16/2010 and ended on 12/10/2010. Therefore, the student withdrew prior to the end of the payment period. There was no R2T4 calculation in the student's financial aid folder, which was brought to the attention of the Financial Aid Director during the program review. The R2T4 calculation was calculated on 8/15/2012, therefore making the calculation untimely. Due to the time period student #13 withdrew, the student did earn 100% of the Direct Loans that were disbursed to the student's account ledger. Therefore, the institution did not have to return any of the Title IV funds to the Department.

Required Action:

As stated above, 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 668.22.

In response to this finding, the institution must provide assurance that it will calculate all of its R2T4 calculations in a timely manner and if applicable, return all Title IV refunds within the 45-day time frame. The institution will be required to submit a copy of its revised R2T4 policy in its response to finding 4.

Finding 2. Failure to Reconcile Direct Loan Discrepancies Between G5, Common Origination & Disbursement (COD) and Institutional General Ledgers for 2011-2012

Citations:

An institution shall account for the receipt and the expenditure of Title IV, HEA program funds in accordance with generally accepted accounting principles. An institution shall establish and maintain on a current basis financial records that reflect each HEA, Title IV program transaction, general ledger control accounts, and related subsidiary accounts that identify each Title IV, HEA program transaction and separate those transactions from all other institutional financial activity. 34 C.F.R. § 668.24, General Provisions.

An institution shall report to the Secretary any change in the amount of a grant for which a student qualifies including any related Payment Data changes by submitting to the Secretary the student's Payment Data that discloses the basis and result of the change in award for each student. The institution shall submit the student's Payment Data reporting any change to the Secretary by the reporting deadlines published by the Secretary in the *Federal Register*. 34 C.F.R. § 690.83(b), Federal Pell Grant Program.

Noncompliance:

An examination of the institution's general ledgers, COD, and G5 revealed discrepancies for the total amount of expenditures for the Direct Loan program for the 2011-2012 award year. COD reported \$81,322,305, G5 reported \$76,011,306, and the institution's general ledgers reported \$76,000,771.25 as the total expenditures for the 2011-2012 award year.

Required Action:

The institution must reconcile its reports for the 2011-2012 award period so that the reported Direct Loan expenditures and the institution's accounting records are all in agreement.

In response to this report, the institution must state what actions have been taken or are being taken to correct this problem. The institution must provide this office with a copy of its reconciliation. Once the Department receives the institution's response to this finding, further guidance will be provided to the institution.

Finding 3. Inaccurately Reporting Disbursement Information to COD

Citation:

34 C.F.R. § 690.83 requires institutions to submit a student's payment data (including disbursement dates) to the Secretary by the reporting deadlines published in the Federal Register. Institutions are required to submit Federal Pell Grant and/or Federal Direct Loan disbursement records to the Common Origination and Disbursement (COD) system no later than 30 days after making a disbursement or becoming aware of the need to adjust a student's previously reported disbursement (COD Technical Reference, 2011-2012, Volume II). The disbursement date is the date that the institution:

- (a) Credits funds to a student's account, or;
- (b) Pays funds to a student directly.

Refer to the COD Technical Reference, 2011-2012 and the June 29, 2012 Federal Register for the most recent reporting deadlines and requirements.

Noncompliance:

Disbursement dates reported to COD were not accurate for all of the students in Appendix A. The following chart illustrates a sample of the difference between dates that Title IV funds were disbursed to the student's accounts versus disbursement dates reported to COD:

Student	COD	Student Account Ledger	Program	Amount
1	08/11/2010 01/13/2011	08/19/2010 01/18/2011	DL	\$4,250, \$6,000, \$15,589 \$4,250, \$6,000, \$15,588
2	08/11/2010 01/13/2011	08/19/2010 01/18/2011	DL	\$4,229, \$5,970, \$9,750 \$4,229, \$5,970, \$9,750
3	09/10/2010 01/13/2011	09/13/2010 01/18/2011	DL	\$4,229, \$5,970 \$4,229, \$5,970
4	08/11/2010 01/13/2012	08/19/2010 01/18/2012	DL	\$4,229, \$5,970, \$17,246 \$4,229, \$5,970, \$17,246
5	08/11/2010 01/13/2011	08/20/2010; 08/19/2010 01/18/2011	DL	\$4,229, \$5,970, \$17,246 \$4,229, \$5,970, \$12,559
6	08/11/2010 01/13/2011 02/02/2011	08/19/2010 01/18/2011 02/03/2011	DL	\$4,229, \$5,970, \$9,750 \$4,229, \$5,970, \$12,796 \$3,200
7	08/11/2010 01/13/2011	08/19/2010 01/18/2011	DL	\$4,229, \$5,970, \$12,930 \$4,229, \$5,970, \$12,930
8	08/11/2010 01/13/2011	08/19/2010 01/18/2011	DL	\$4,229, \$5,970 \$4,229, \$5,970

Florida Coastal School of Law

OPE ID: 03374300

PRCN: 201240428019

Page 7

9	09/03/2010 01/13/2011	09/07/2010 01/18/2011	DL	\$4,220, \$5,970 \$4,220, \$5,970
10	08/11/2010 01/13/2011 01/13/2011	08/19/2010 01/18/2011 01/18/2011	DL	\$4,220, \$5,970, \$12,246 \$4,220, \$5,970, \$12,246 \$2,814
11	08/11/2010 01/13/2011	08/19/2010 01/18/2011	DL	\$4,220, \$5,970, \$17,246 \$4,229, \$5,970, \$17,246
12	06/07/2010 08/11/2010 01/13/2011	06/06/2010 08/19/2010 01/18/2011	DL	\$4,229, \$5,970, \$4,306 \$4,229, \$5,970, \$13,497 \$4,229, \$5,970, \$16,311
13	08/11/2010	08/19/2011	DL	\$4,220, \$5,970, \$14,789
14	08/11/2010	08/19/2010	DL	\$8,458, \$11,940, \$5,140
15	08/11/2010 01/13/2011	08/19/2010 01/18/2011	DL	\$4,220, \$5,970, \$11,603 \$4,220, \$5,970, \$11,603
16	01/27/2012 06/08/2012	01/31/2012 06/07/2012	DL	\$16,120 \$4,229, \$5,970, \$4,729
17	08/25/2011 01/17/2012 01/23/2012	08/29/2011 01/20/2012 01/24/2012	DL	\$4,220, \$5,970 \$4,220, \$5,970 \$8,288
18	01/27/2012 03/19/2012 06/08/2012	01/31/2012 03/21/2012 06/07/2012	DL	\$12,356 \$3,000 \$4,229, \$5,970
19	08/19/2011 01/17/2012	08/22/2011 01/20/2012	DL	\$4,229, \$5,970, \$14,995 \$4,229, \$5,970, \$14,994
20	08/19/2011 01/17/2012 06/08/2012	08/22/2011 01/20/2012 06/07/2012	DL	\$4,229, \$5,970, \$13,650 \$4,229, \$5,970, \$17,940 \$4,229, \$5,970, \$3,900
21	08/19/2011 01/17/2012	08/22/2011 01/20/2012	DL	\$4,229, \$5,970, \$18,571 \$4,229, \$5,970, \$18,571
22	01/27/2012 06/08/2012	01/18/2012; 01/31/2012 06/07/2012	DL	\$4,229, \$18,620 \$4,229, \$5,970, \$4,729
23	08/19/2011 01/17/2012 06/08/2012	08/22/2011 01/20/2012 06/07/2012	DL	\$4,229, \$5,970, \$18,523 \$4,229, \$5,970, \$18,523 \$5,970, \$6,494
24	08/19/2011 01/17/2012 06/19/2012 06/18/2012	08/22/2011 01/20/2012 06/22/2012 06/22/2012	DL	\$4,229, \$5,970, \$20,021 \$4,229, \$5,970, \$21,519 \$4,229, \$5,970 \$3,660
25	06/07/2011 08/19/2011 01/17/2012	06/06/2011 08/22/2011 01/20/2012	DL	\$4,229, \$5,970, \$4,295 \$4,229, \$5,970, \$18,523 \$8,458, \$11,940
26	08/19/2011	08/22/2011	DL	\$4,229, \$5,970, \$7,280

	01/17/2012	01/20/2012		\$4,229, \$5,970, \$7,280
27	08/19/2011	08/22/2011	DL	\$4,229, \$5,970, \$18,571
	01/17/2012	01/20/2012		\$4,229, \$5,970, \$18,571
28	05/20/2011	05/18/2011	DL	\$4,229, \$5,970, \$2,055
29	08/19/2011	08/22/2011	DL	\$8,458, \$11,940, \$11,320
30	08/19/2011	08/22/2011	DL	\$4,229, \$5,970
	01/17/2012	01/20/2012		\$4,229, \$5,970, \$14,523
	06/08/2012	06/07/2012		\$4,229, \$5,970, \$3,660

Required Action:

Florida Coastal must review COD reporting procedures to determine why disbursement dates are not accurate for its students. Florida Coastal must correct its procedures so that disbursement dates reported to COD are the dates that Direct Loan funds are credited to the student's account or paid to the student directly. Florida Coastal's response must describe procedures that the institution will put into place in order to correct this deficiency. In addition, the institution must correct the dates in COD. To show the correction has been made in COD, the institution must provide this office with a copy of the "Award Disbursements Information" page from the COD system. Since both award years are now closed, the institution must contact COD to gain access to the system and correct the discrepancies cited in the Program Review Report.

Finding 4. Return of Title IV Policy – Missing Components

Citation:

The institution must have a published refund policy that conforms to state and accrediting agency requirements.

Additionally, the institution must have a written policy that describes how it will meet the requirement to return unearned Title IV funds to the Department when a student withdraws from the institution. This policy is titled the Return of Title IV (R2T4) policy. The R2T4 policy instructs an institution how to determine the amount of Title IV aid an institution earns when a student does not complete the period of enrollment.

When a recipient of Title IV grant or loan assistance withdraws from an institution during a payment period or a period of enrollment in which the recipient began attendance, the institution must determine the amount of Federal Student Aid program assistance (not including FWS or the non-federal share of FSEOG) that the student earned as of the student's withdrawal date. 34 C.F.R. § 668.22, General Provisions.

Noncompliance:

The institution failed to include the following required items in its R2T4 policy. The R2T4 policy must include the following:

- A system to determine the withdrawal date for a student who withdraws officially or unofficially;
- Guidelines pertaining to the 45 day time frame for the return of Title IV program funds;
- Guidelines pertaining to the order in which Title IV program funds must be returned.

Required Action:

In response to this finding, the institution must revise its current R2T4 policy to comply with federal regulations. A copy of the revised policy must be submitted to this office.

Finding 5. Verification Policy – Missing Components

Citation:

An institution shall establish and use written policies and procedures for verifying information contained in a student aid application. 34 C.F.R. § 668.53(a), General Provisions.

The institution must have written policies and procedures that address the following issues:

- Deadlines for students to submit documentation and consequences of the failure to meet those deadlines,
- A method of notifying students of award changes due to verification,
- Required correction procedures for students, and
- Standard procedures for referring overpayment cases to the Department.

Additionally, the school must give each applicant selected for verification a written statement explaining the following:

- Documents required for verification.
- Student responsibilities – including correction procedures, the deadlines for completing any actions required, and the consequences of missing the deadlines.

- Notification methods – how your school will notify a student if her award changes as a result of verification, and the time frame for such notification.

Noncompliance:

The institution's verification policy does include a method of notifying students of award changes due to verification and the required correction procedures for students, but does not include the other aforementioned requirements.

Required Action:

In response to this finding, the institution must develop a verification policy to comply with federal regulations. A copy of the revised verification policy must be submitted to this office.

Finding 6. Satisfactory Academic Progress Policy – Missing Components

Citations:

General Provisions 34 C.F.R. § 668.16(e), 668.32, and 668.34 require institutions to establish, publish and apply reasonable standards for measuring whether an otherwise eligible student is maintaining satisfactory academic progress (SAP) in his or her educational program. The Secretary considers an institution's standards to be reasonable if they are at least as strict as that for students who are not receiving Title IV funds, and are applied consistently to all educational programs and to all students within categories (e.g., full-time, part-time, undergraduate and graduate students).

The Department published amendments to SAP on October 29, 2010, which became effective on July 1, 2011. Among those changes, one significant modification is that the policy provides that a student's academic progress is evaluated-

- At the end of each payment period if the educational program is either one academic year in length or shorter than an academic year; or
- For all other educational programs, at the end of each payment period or at least annually to correspond with the end of a payment period.

All SAP policies for Title IV purposes must specify the qualitative standard (grade point average or GPA) that a student must have at each evaluation or, if GPA is not an appropriate qualitative measure, a comparable measure against a norm. Students enrolled in a program of more than two academic years must have a GPA of at least a "C" or its equivalent or must have an academic standing consistent with the school's graduation requirements.

An institution's SAP policy must specify the quantitative standard (pace) at which students must progress through their program to ensure that they will graduate within the maximum timeframe, each academic progress check must measure this.

An institution's SAP policy must explain how GPA and pace of completion are affected by course incompletes, withdrawals, repetitions and transfer credits from other schools. At a minimum, transfers credits that count toward the student's current program must count as both attempted and completed hours. An institution's SAP policy cannot exclude courses in which a student remained beyond the Add/Drop period and earned a grade of "W" (or its equivalent), nor can it routinely exclude certain hours attempted, such as those taken during a summer session.

If a SAP check shows that a student does not have the required GPA or is not maintaining the required pace, he or she becomes ineligible for Title IV funds unless she is placed on financial aid warning or probation, as explained:

Financial aid warning: Only schools that check SAP at the end of each payment period may place students on financial aid warning as a consequence of not making satisfactory progress. A school may do this without a student appeal. Warning status lasts for one payment period, during which the student may continue to receive Title IV funds. Students who are still failing to make satisfactory progress after the warning period lose their aid eligibility unless they successfully appeal and are placed on probation.

Financial aid probation: A status a school assigns to a student who is failing to make SAP and who successfully appeals. Eligibility for aid may be reinstated for one payment period only. While a student is on financial aid probation, the institution may require him or her to fulfill specific terms and conditions such as taking a reduced course load or enrolling in specific courses. At the end of one payment period on financial aid probation, the student must meet the institution's SAP standards or meet the requirements of the academic plan developed by the institution in order for the student to qualify for further Title IV funds.

Appeal: A process by which a student who is not meeting SAP standards petitions the school for reconsideration of his eligibility for FSA funds. A student may appeal that result of not making SAP on the basis of: injury or illness, the death of a relative, or other special circumstances. The appeal must explain why he or she failed to make satisfactory progress and what has changed in his or her situation that will allow him or her to make satisfactory progress at the next evaluation. Students who fail the satisfactory progress check after the end of the probationary payment period may only continue to receive aid if they successfully appeal, the school develops an academic plan, and they will meet the standards by a specific time.

An institution must also explain how students who are not making SAP can restore their eligibility for Title IV funds. Other than when a student is placed on financial aid warning, probation, or has agreed to an academic plan as outlined above, he or she can regain eligibility only by taking action that brings the student into compliance with the school's standards. For example, the requirement that a student complete a number of credits or enroll for a number of academic periods without receiving funds may be part of a school's SAP policy. However, neither paying for one's classes nor simply sitting out for a term affects a student's academic progress standing, so neither is sufficient to reestablish aid eligibility.

Please refer to 34 C.F.R. § 668.34 for additional amendments to SAP requirements.

Noncompliance:

The reviewers observed that the institution's current written SAP policy is not in compliance with federal regulations.

The institution's SAP policy is (1) missing how the school will treat transfer students and transfer hours, incompletes, and withdrawals on satisfactory academic progress, (2) missing specific appeal procedures, (3) does not specify the mitigating circumstances that will be evaluated, and (4) procedures on how the student will re-establish eligibility.

Required Action:

In response to this finding, the institution must revise its current SAP policy to comply with federal regulations. A copy of the revised policy must be submitted to this office.

Finding 7: Campus Security – Missing Required Policies and Statements

Citation:

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (formerly the Campus Security Act of 1990) requires an institution to publish specific crime-related information on an annual basis. The report includes information about a school's security policies and procedures, crime-prevention programs, and campus-crime statistics. The school must distribute this information to all current students and employees and, on request, to prospective students and employees. 34 C.F.R. § 668.46, General Provisions.

Noncompliance:

The reviewers requested to review a copy of the institution's most recent Campus Security Report. After reviewing the institution's Campus Security Report, it was determined that the following required policies and statements were missing from the Campus Security Report except the information listed under paragraph number 1:

- (1) Crime Statistics. Crimes that must be reported. An institution must report statistics for the three most recent calendar years concerning the occurrence on campus, in or on non-campus buildings or property, and on public property of the following that are reported to local police agencies or to a campus security authority: 34 C.F.R. § 668.46 (c)(1), General Provisions.
 - (i) Criminal homicide:
 - (A) Murder and non-negligent manslaughter.
 - (B) Negligent manslaughter.
 - (ii) Sex offenses:
 - (A) Forcible sex offenses.
 - (B) Non-forcible sex offenses.
 - (iii) Robbery.
 - (iv) Aggravated assault.
 - (v) Burglary.
 - (vi) Motor vehicle theft.
 - (vii) Arson.
 - (viii) Liquor law violations
 - (A) Arrests for liquor law violations, drug law violations, and illegal weapons possession.
 - (B) Persons not included in paragraph (c)(1)(viii)(A) of this section, who were referred for campus disciplinary action for liquor law violations, drug law violations, and illegal weapons possession.

The institution must determine if any of the crimes listed in the above categories were hate crimes. If so, the institution must report by category of prejudice (actual or perceived race, gender, religion, sexual orientation, ethnicity or disability).

- (2) A statement of current campus policies regarding procedures for students and others to report criminal actions or other emergencies occurring on campus. This statement must include the institution's policies concerning its response to these reports, including:

- (i) Policies for making timely warning reports to members of the campus community regarding the occurrence of crimes (as described in 34 C.F.R. § 668.46 (c)(1).
 - (ii) Policies for preparing the annual disclosure of crime statistics.
 - (iii) A list of the titles of each person or organization to whom students and employees should report the criminal offenses described in 34 C.F.R. § 668.46 (c)(1) for the purpose of making timely warning reports and the annual statistical disclosure. This statement must also disclose whether the institution has any policies or procedures that allow victims or witnesses to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics, and, if so, a description of those policies and procedures.
- (3) A statement of current policies concerning security of and access to campus facilities, including campus residences, and security considerations used in the maintenance of campus facilities.
- (4) A statement of current policies concerning campus law enforcement that:
- (i) Addresses the enforcement authority of security personnel, including their relationship with State and local police agencies and whether those security personnel have the authority to arrest individuals;
 - (ii) Encourages accurate and prompt reporting of all crimes to the campus police (if any) and the appropriate police agencies; and
 - (iii) Describes procedures, if any, that encourage pastoral counselors and professional counselors, if and when they deem it appropriate, to inform the persons they are counseling of any procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics.
- (5) A description of the type and frequency of programs designed to inform students and employees about campus security procedures and practices and to encourage students and employees to be responsible for their own security and the security of others.
- (6) A description of programs designed to inform students and employees about the prevention of crimes.
- (7) A statement of policy concerning the monitoring and recording through local police agencies of criminal activity in which students engaged at off-campus locations of student organizations officially recognized by the institution, including student organizations with off- campus housing facilities.

- (8) A statement of policy regarding the possession, use, and sale of alcoholic beverages and enforcement of State underage drinking laws.
- (9) A statement of policy regarding the possession, use, and sale of illegal drugs and enforcement of Federal and State drug laws.
- (10) A description of any drug or alcohol-abuse education programs, as required under section 120(a) through (d) of the HEA. For the purpose of meeting this requirement, an institution may cross-reference the materials the institution uses to comply with section 120(a) through (d) of the HEA.
- (11) A statement of policy regarding the institution's campus sexual assault programs to prevent sex offenses, and procedures to follow when a sex offense occurs. The statement must include:
 - (i) A description of educational programs to promote the awareness of rape, acquaintance rape, and other forcible and non-forcible sex offenses;
 - (ii) Procedures students should follow if a sex offense occurs, including procedures concerning who should be contacted, the importance of preserving evidence for the proof of a criminal offense, and to whom the alleged offense should be reported;
 - (iii) Information on a student's option to notify appropriate law enforcement authorities, including on-campus and local police, and a statement that institutional personnel will assist the student in notifying these authorities, if the student requests the assistance of these personnel;
 - (iv) Notification to students of existing on- and off-campus counseling, mental health, or other student services for victims of sex offenses;
 - (v) Notification to students that the institution will change a victim's academic and living situations after an alleged sex offense and of the options for those changes, if those changes are requested by the victim and are reasonably available;
 - (vi) Procedures for campus disciplinary action in cases of an alleged sex offense, including a clear statement that:
 - (A) The accuser and the accused are entitled to the same opportunities to have others present during a disciplinary proceeding; and
 - (B) Both the accuser and the accused must be informed of the outcome of any institutional disciplinary proceeding brought alleging a sex offense; and

(vii) Sanctions the institution may impose following a final determination of an institutional disciplinary proceeding regarding rape, acquaintance rape, or other forcible or non-forcible sex offenses.

(12) Effective October 1, 2003, a statement advising the campus community where law enforcement agency information provided by a State under section 170101(j) of the Violent Crime Control and Law Enforcement Act of 1994 (42 U.S.C. §14071(j)), concerning registered sex offenders may be obtained, such as the law enforcement office of the institution, a local law enforcement agency with jurisdiction for the campus, or a computer network address.

Required Action:

In response to this report, the institution must develop a Campus Security Report and policies and procedures according to the requirements in the federal regulations and submit a copy of its Campus Security Report and policies and procedures to this office. Also, the institution must provide assurance that this report is distributed to all of its current students and employees and made available to all prospective students and employees.

D. Appendices

Appendix A (Student Sample) contains personally identifiable information and will be emailed to Florida Coastal as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The Student Sample was given to the institution at the Entrance Conference held on August 13, 2012, but this sample has been renumbered to include the numbers 1-30.

Appendix B contains the instructions for encrypting files.

**Florida Coastal School of Law
OPEID# 03374300
Student Statistical Sample (Appendix A)
2010-2011 and 2011-2012 Award Years**

Name

SSN

2010-2011

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

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.

- FLORIDA -
COASTAL
SCHOOL OF LAW

Financial Assistance

November 21, 2012

Ms. LaTonya Nesbitt
Federal Student Aid
Atlanta School Participation Division
830 First Street, NE 7th Floor
Washington, DC 20202

RE: Program Review Report Response
OPE ID 03374300
PRCN: 201240428019

Dear Ms. Nesbit,

We have reviewed your findings and have responded as requested.

Accompanying this letter is a short narrative on each finding as well as the required corrective action. For the findings that required a rewriting of a policy, the new policy has been included.

Other required supporting documentation also accompanies this letter.

We look forward to the final program review determination.

If you have any questions, please do not hesitate to contact me. rcollins@fcsl.edu or 904-680-7717.

Sincerely,



Roger Collins
Director of Financial Assistance
Florida Coastal School of Law

Florida Coastal School of Law School Response
Program Review Report: 201240428019

Finding #1

Narrative:

At the time of withdrawal, it was apparent by looking at the calendar that the student had eclipsed the 60% time period when any funds would have to be returned so it seemed unnecessary to calculate, print, and place in the students file. This was explained at the time of the program review and demonstrated by running the R2T4 calculation.

Required Action:

FCSL will in the future calculate an R2T4 in all cases, even in situation like this one where the student has attended past the 60% point of the semester and that 100% of the funds were earned by the student.

Finding #2

Narrative:

The school does have in place a process for monthly monitoring and balancing using the SAS report received from COD. At the time of the program review the 2011-12 year was (and is still) open at COD. There are sometimes monthly reconciling items as the year progresses. The school has until July 31, 2013 to balance and resolve all discrepancies with COD.

Required Action:

Included with this response are updated COD, G5 and GL amounts indicating that we have reconciled COD, G5 and Coastal's GL. We have included printouts of the COD School summary, G5 Award activity report and Cash Receipts Summary for the GL for documentation.

Finding #3

Narrative:

When the origination record is sent to COD an estimated disbursement date is picked up from our software as the date for disbursement. When the disbursement file was sent to COD the disbursement date was not being updated to reflect any changes.

Required Action:

We have since that time starting using a feature in our software so that when the disbursement file is sent to COD the disbursement date will be updated based on the date the file is being sent plus 2

business days to allow for the file to be processed, funds to be drawn from G5 and credited to the students account. That way the dates at COD and the school's student ledger cards will match.

See the included COD print outs for the manual corrections made as requested.

Finding #4

Narrative:

The prior program review in January 2006 approved the schools Return to Title IV policy and since no regulatory changes have been made, we did not expect to have a finding in this area.

Required Action:

We have updated the R2T4 policy to include the changes suggested by the August 2012 review. See below.

Return of Title IV Funds

To officially withdraw a student must contact the Registrar's Office and complete the required forms. Once the Registrar's Office has processed the withdrawal, they notify the Financial Aid Office and the Finance Office. The Return to Title IV calculation is done by the Finance Office and a copy of the worksheet is given to the Financial Aid Office for the student's file.

FCSL is required to take attendance; the maximum number of missed classes is 5. If a student does not take the steps for an official withdrawal, once a student has missed 5 days they are contacted by an Administrative Dean and withdrawn from the class. If they miss 5 days in all of their classes, they are contacted by an Administrative Dean and are withdrawn from all classes. The following steps are then followed for the purposes of Return to Title IV using the last date of attendance in a class as the last date of attendance for the purpose of the calculation.

This information is included in the Financial Aid Handbook and is also posted on the FCSL web site.

For students who receive federal financial aid and who withdraw from ALL classes on or before 60% of the term has elapsed, FCSL will calculate, according to federal regulations, any amounts disbursed that must be returned to the Title IV programs.

Step 1: Determine the percentage of the enrollment period the student attended before withdrawing (days attended divided by total days in the period).

Step 2: Determine the amount of Title IV aid earned by multiplying the total Title IV aid for which the student was awarded by the percentage of time enrolled.

Step 3: Compare the amount earned to the amount disbursed. If more aid was disbursed than earned, determine the amount of Title IV aid that must be returned by subtracting the earned amount from the disbursed amount.

Step 4: Allocate the responsibility for returning unearned aid between the school and the student according to the portion of disbursed aid that could have been used to cover institutional charges and

the portion that could have been disbursed directly to the student once the institutional charges were covered.

Step 5: Distribute the unearned funds back to the appropriate Title IV program within 45 days of the withdrawal date. The order in which funds are returned is:

Unsubsidized Direct Stafford Loan

Subsidized Direct Stafford Loan (as of July 1, 2012 there is no longer Subsidized loans for graduate students)

Direct PLUS for graduate students

FCSL does not participate in any other programs in respect to Return to Title IV.

The student will be billed for any amount due to FCSL as a result of Title IV funds that were returned that would have been used to cover FCSL charges.

Finding #5

Narrative:

The prior program review in January 2006 approved the schools Verification Policy and since no regulatory changes have been made, we did not expect to have a finding in this area.

Required Action:

We have updated the Verification policy to include the changes suggested by the August 2012 review. See below.

Verification

Florida Coastal School of Law completes the verification process for all students chosen by the CPS in processing the students FAFSA.

When we receive the ISIR we note that the student has been chosen and send them a letter indicating they have been chosen for verification, the required information and any required documentation. We also enclose a Verification Worksheet (using the form supplied by the Department of Education).

The letter also states the deadline to submit documentation is 14 calendar days after the student receives the letter from the Finance Aid Office.

The student is also told in the letter that no award will be made until the information is submitted.

Once we receive the documentation from the student, a Financial Aid Officer reviews the information and makes corrections as necessary and submits them to the Department of Education for reprocessing. When the corrected ISIR is received, we then proceed with the awarding process.

If for any reason the student is subsequently chosen for verification after an award has been made, the student will be notified immediately and the award will be placed on hold until the required documentation is received and the information verified. If a correction to the award is necessary, a revised award notice will be mailed to the student within 15 days.

The requirement for referring overpayments to the Department is not applicable as FCSL does not participate in any Title IV grants programs or Perkins loans.

School responsibility for reporting fraud to the Office of Inspector General

If any credible information indicating that an applicant may have engaged in fraud or other criminal misconduct in connection with his/her application is discovered, it will be referred to the Office of Inspector General. The type of information that will be referred will be information that is relevant to the eligibility of the applicant or the amount of assistance. Examples of this type of information are: false claim of independent status, false claim of citizenship, use of false identity, forgery of signature, false statement of income.

Also, Florida Coastal will report to the Office of Inspector General, any credible information indicating that any employee, third-party servicer, or other agent of the institution that acts in a capacity that involves the administration of the Title IV, HEA programs, or the receipt of funds under those programs, may have engaged in fraud, is representation, conversion or breach of fiduciary responsibility, or other illegal conduct involving the Title IV, HEA programs. The type of information that we will refer is that which is relevant to the eligibility and funding of the institution and its students through the Title IV, HEA programs.

Finding #6

Narrative:

The prior program review in January 2006 approved the schools Satisfactory Academic Progress Policy so we did not expect to have a finding in this area.

Required Action:

We have updated the Satisfactory Academic Progress policy to include the changes suggested by the August 2012 review. See below

Satisfactory Academic Progress Policy

Satisfactory Academic Progress at Florida Coastal School of Law is overseen by the Academic Departments. If a student is not meeting SAP standards, the Academic Dean or his/her designee notifies the Finance department to hold any disbursements until the student has processed an appeal and is again eligible for aid. If the student does not appeal or if the appeal is denied, the funds are returned to the lender.

Qualitative:

First semester: Student must have at least a 1.6 GPA at the end of their first semester or they will be academically dismissed and become ineligible for aid.

Second semester: Student must have at least a 1.9 GPA at the end of their second semester in order to continue and be eligible for aid.

Third semester and thereafter: Student must maintain a 2.0 GPA.

The Registrar's Office calculates grades at the end of each semester. Students not meeting the standard may petition the Academic Department and if approved may continue to receive aid; otherwise they will be dismissed and ineligible for aid.

Quantitative:

Per the FCSL student Handbook, full time students have a maximum time frame of 5 years to complete their requirements; part time students have a maximum time frame of 6 years. If a student withdraws from a class during the semester, he must receive a signature from the Assistant Dean of Academics, who will review the student's progress toward his degree in the required time frame. Additionally, if a student does not register for the minimum number of credits for the status he has elected (i.e., full time or part time), he must receive the approval of the Assistant Dean of Academics. The dean will review the student's records to ensure that the student is making satisfactory progress toward his degree in the required time frame.

Transfer/Incompletes/Withdrawals

Transfers

A student can transfer up to 45 credits to Florida Coastal School of Law. These hours would be included in the quantitative SAP component. The grades earned in the credits transferred will not be included in the qualitative component.

Incompletes

A grade of incomplete does not factor into SAP as it is a temporary grade. The student has 30 days after the end of a semester to complete the course requirements and receive a grade. If the student has not taking the steps to complete the course requirements and receive a grade, the grade will default to an "F". After the 30 days the regular grade or the default "F" will factor into both the quantitative and qualitative components of SAP.

Withdrawals

If a student withdraws from a class after the drop/add period the student will receive a "W" grade. The W does not calculate as part of the qualitative component of SAP.

For the quantitative measure, if a student withdraws from a class during the semester, he must receive a

signature from the Assistant Dean of Academics, who will review the student's progress toward his degree in the required time frame.

Appeals

Students that are dismissed and ineligible for aid may submit a petition to the Associate Dean of Academic Affairs within 7 days of being notified of their dismissal and ineligibility of aid.

Examples of the types of mitigating circumstances that will be considered for an appeal as defined by 34 C.F.R.668.34 are: death of a relative of the student, an injury or illness of the student, other special circumstances.

Re-establish eligibility

A student can re-establish eligibility by having their appeal approved and raising their GPA to an acceptable level.

Finding #7

Narrative:

We concur that the Campus Security policies and statements needed to be revised.

Required Action:

We have updated the Campus Security policies to include the changes suggested by the August 2012 review. See below. These policies will be distributed to all of our current students and employees and will be made available to all prospective students and employees.

Security Report Policies and Procedures

Overview

Florida Coastal School of Law (Coastal) is committed to providing a safe and secure environment for all faculty, staff, students, and visitors. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (formerly the Campus Security Act of 1990) requires an institution to publish specific crime-related information on an annual basis. The report includes information about a school's security policy and procedures, crime-prevention programs, and campus-crime statistics. The school must distribute this information to all current students and employees, and upon request, to prospective students and employees.

Coastal's Facilities department maintains the building and grounds with a concern for safety and security. Its staff regularly inspects the campus, evaluates lighting, and makes repairs affecting safety and security hazards such as broken windows and locks. Coastal has implemented a variety of security measures to protect the campus community. These measures include a trained staff of 15 guards that are stationed in shifts strategically through-out the campus, and a network of video cameras in numerous locations through-out the school and parking garage. The cameras are under constant surveillance by a security guard and they have recording capability. All persons who come to campus are

expected to obey all laws and department rules related to the use of the school. Those who fail to comply are subject to arrest and/or disciplinary action.

Campus Security Location

The Coastal Security Department is located on the fourth floor, north wing, in room #427. They are open from 7:00 am to midnight seven days a week unless special hours are noticed to the community for holiday closures, etc.

Responsibilities

The Coastal Security officers have the authority to ask persons for identification and to determine whether individuals have lawful business at Coastal. Security officers do not have arrest powers. Officers do write incident reports and refer criminal reports to the Jacksonville Sheriff's Office (JSO) who have jurisdiction on the campus. The Security Department maintains a highly professional working relationship with the JSO. All crime victims and witnesses are strongly encouraged to immediately report any crime to campus Security and the appropriate police agency. Prompt reporting will assure timely warning notices on-campus and timely disclosure of crime statistics.

HOW CAN YOU HELP MAKE A SAFE CAMPUS?

Safety, security and crime prevention are the responsibilities of everyone. The cooperation and involvement of faculty, staff and students are absolutely essential to having a safe campus. The safety and security of you and your belongings begin with your own awareness and commitment to safety of the community. Three elements must be present for a crime to occur: desire, ability and opportunity. A person may want to commit a crime and have the ability to do it, but if we deny them the opportunity, then a crime is less likely to be committed.

SAFETY TIPS

- Be alert. Watch for obvious strangers around your office, your home or apartment.
- Check for signs of a break-in before entering an empty house, office or car. Call the police if you see signs of forced entry to a building or a car.
- Call the police if you are experiencing any minor theft problems over a period of time.
- Involve your associates. If you are expecting a delivery or a guest in your absence, leave your keys with a neighbor or a coworker. Let your office staff and neighbors know when you will be away from home and ask them to challenge strangers in the area.
- Maintain a record of serial numbers of your property and of identification and credit cards. Include a brief description with each and keep this information in a safe place.
- Report any crime or suspicious activity to the police. Be prepared to supply as much information as possible; such as descriptions of people, property and cars.
- If you would like additional information on crime prevention or wish to discuss a problem which may be crime related, contact the Director of Security at (904)-680-7669.

I am a victim of ID theft...what should I do??

File a report with the jurisdiction where the crime occurred.

Contact one of the three major credit card reporting bureaus (Equifax 800-525-6285, Experian 800-301-7195, or Trans Union 800-680-7289) to report the fraud. Ask that a fraud alert be placed on your file and request a copy of your credit report. The other two bureaus will automatically be notified to place a fraud alert on your credit file and all three reports will be sent to you free of charge.

Contact the creditors for the accounts that have been tampered with and opened fraudulently to close those accounts. Advise them of the fraudulent use of your information and request that they send you a fraud dispute form. Most creditors will accept the FTC fraud affidavit.

<http://www.ftc.gov/bcp/online/pubs/credit/affidavit.pdf>

File a complaint with the Federal Trade Commission (FTC). The FTC maintains a database that Law enforcement can use to assist with their investigation.

Report Incidents: Like any other community Coastal may experience accidents, injuries, crimes, and other emergencies. To report voluntary incidents, potential criminal actions, suspicious incidents, or other emergencies at Coastal faculty, staff, students, and visitors should notify the Coastal Security department at (904)-680-7777. To report an incident of a confidential nature, an individual should contact a Campus Security authority or the Director of Security Bruce Murr (904-680-7669). If Coastal or the Security Department is notified of a crime the Department may issue a Campus Safety Alert via E2 Campus, detailing the incident and providing tips so that other community members may avoid similar incidents.

Coastal Campus Security Authorities:

Director of Security, Bruce Murr.....	904-680-7669
Associate Dean of Student Affairs, Tom Taggart	904-256-1234
VP of Finance and Administration, Bruce Wilson.....	904-680-7720
Receptionist Desk	904-680-7700
Vice Dean, Cynthia Stroud.....	904-680-7799
Associate Academic Dean, Cynthia Irvin	904-680-7653
Assistant Academic Dean, Danielle Noe.....	904-680-7659

Stay Informed: The Coastal Security Department uses a variety of methods to keep the campus informed about incidents reported occurring on or near campus:

Crime Alert Notification by cell phone and email: Faculty, Staff, and students are able to sign up on the school web site to receive crime alerts by cell phone and email. This service must be renewed at the beginning of each semester. Also such incidents can be communicated via displays on the plasma screens that are located through-out the campus.

Incident Reports: Incident Reports are completed by the Security Department and retained there for inclusion of any necessary crimes in the annual Campus Safety and Security Survey. Additionally, as part of the annual survey, the Security Department contacts the JSO to discover and report any criminal activity that has taken place in the immediate vicinity of the campus.

Panic Buttons: For the safety of the Coastal community in the adjoining school parking garage panic buttons are located on each floor of the garage outside and inside each stairwell. When these alarms are activated an audible alarm sounds and flashing lights activate. Additionally, garage video cameras automatically focus to that area and a duress signal is automatically sent to a dedicated monitor in the Security office.

Escort Service: Upon request by students, employees and visitors an escort will be provided. Officers are available to walk you to your vehicle or drive you in our Safety Patrol electric vehicle (Call 904-680-7777).

Lost and found: Coastal Security operates a lost and found area. You can stop by the security office located in room #427 to drop off property or inquire about lost property.

Crime Awareness and Prevention Speakers: You can request a speaker by calling the Director of Security to come by and talk with your group or organization about crime awareness and prevention.

Federal Campus Sex Crimes Prevention Act:

The Federal Campus Sex Crimes Prevention Act, (section 1601 of Public Law 106-386) enacted on October 28, 2000, went into effect October 28, 2002. It is a law that provides for the tracking of convicted, registered sex offenders enrolled as students at institutions of higher education, or those working or volunteering on campus. The law requires institutions of higher education to issue a statement advising the campus community where law enforcement agency information provided by a State concerning registered sex offenders may be obtained. It also requires sex offenders already registered in a State to provide notice to the appropriate state agency, as required under state law, of each institution of higher education in that State at which the person is employed, carries on a vocation, or is a student. This information is required to be reported to the Jacksonville Sheriff's office (904-630-0500). Information on registered sex offenders can be obtained on the following websites listed below.

State website: www.fbi.gov/hq/cac/states.htm

National Sex Offender Public Registry: www.nsopr.gov

Sexual Offenses

What to Do?

All incoming students are made aware of the Student Code of Content that outlines all prohibited behaviors at Coastal including criminal behavior and sexual offenses.

No matter how careful you are or how safety conscious your behavior, you might at some point find yourself or someone you know experiencing an unwelcome sexual encounter. We recommend the following procedures to ensure your safety and well-being. If you are sexually assaulted on the Coastal campus, we recommend that you call the Coastal Security Office 904-680-7777. An Officer will respond immediately to your location, stay with you and call JSO, who will immediately transport you to a hospital. Should you request to contact law enforcement authorities directly, a member of the Security department will assist you in doing so. Although your first instinct after a sexual assault is to bathe, it is very important that you do not bathe, wash, gargle, brush your hair, or change your clothes. Important evidence could be destroyed if you do so. In the event that you bathe inadvertently, it is still important to seek medical care. Reporting a sexual assault may prevent another assault. Reporting the incident does not mean that the survivor must proceed with a prosecution. Immediately following an attack the survivor should try to write down everything she or he remembers about the incident.

In the event that a victim of a sexual offense requests the need for counseling, our student affairs office can refer the victim to an appropriate off-campus counseling center. On-campus counseling is available for those instances where the needs of the victims are not so intense that off-campus referral would be more appropriate.

Also, when reasonably available and requested by a victim, the school will seek to change a victim's academic and/or living situations, and notify the victim of the options.

Due Process

Students have a right to due process when accused of a sexual offense. This right includes the following.

1. A notice in writing of any charges and the opportunity to be made aware of the evidence against him or her.
2. The accuser and the accused both are entitled to the same opportunities to have others present during a disciplinary proceeding.
3. The accuser and the accused will be notified of the outcome of the disciplinary hearing.
4. Upon a finding of responsibility under the school Student Code of Conduct, one or more of the following sanctions may be imposed, notation or reprimand, disciplinary probation, suspension or expulsion from Law School. Other sanctions may be imposed as determined by the hearing team.

Access to Campus

Coastal has taken responsibility to employ a variety of security measures to protect the campus community. Video cameras are strategically deployed in the building and in the parking garage, while security officers are strategically placed through-out the campus, as well as roaming the facilities. Also in December of 2012, Coastal is implementing a guest ID badge and sign-in log procedure. Visitors must state their business, show proper identification, and sign in using the visitor log before they are issued a temporary guest badge which is to be displayed on a lanyard.

ALCOHOL AND DRUG USE AND ABUSE

Coastal is committed to preventing the use of illegal substances by students, faculty, and staff and to encouraging responsible behavior regarding alcohol and legal addictive substances through policy, needs assessment, education, and treatment.

The office of the Associate Dean for Students offers the services of assessment, referral, and short-term counseling to students who are experiencing substance abuse problems. This office also offers referral services to counseling professionals for students. A student may seek these services on his or her own initiative or a member of the administrative or instructional team may direct him/her to the service when a decline in performance is observed.

Coastal prohibits the unlawful manufacture, distribution, dispensing, possession, consumption, sale or use of illegal drugs and alcohol on or in Coastal owned or controlled property or in the course of Coastal business or activities. Students or employees who violate this policy shall be subject to disciplinary action or arrest.

Campus Phone Numbers

Security.....	904-680-7777
Director of Security	904-680-7669
Associate Dean for Student Affairs	904-256-1234
Vice Dean	904-680-7799
VP of Finance and Administration.....	904-680-7720