

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

Institution: Florida State College at Jacksonville

City, State: Jacksonville, Florida

PRCN: 240428075

TIN: 591149317

DUNS: 623113990

Reviewer: Jon Finkelstein

Region: Atlanta

Date: 2/25/2014

Programs	Type	Amount	Funding Code	Object Class
Federal Pell Grant (Closed AY)	Principal	\$3,220,765	3220RNOYR	69017
	Interest	\$ 34,855	1435RNOYR	64020
ACG	Principal	\$ 34,547	3220RNOYR	69017
	Interest	\$ 522	1435RNOYR	64020
National SMART	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
FSEOG (No FISAP Corrections)	Principal	\$ 44,647	3220RNOYR	69017
	Interest	\$ 172	1435RNOYR	64020
FWS (No FISAP Corrections)	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020
Direct Loan and Direct Loan EAL	Principal		4253XNOYR	53020 or 53010
	Interest	\$111,079	4253XNOYR	53040
FFEL and FFEL EAL	Interest/ SA/EAL		4251XNOYR	53020
Federal Perkins	Principal		2915RNOYR	53054

Add rows if necessary	Program / Award Year	Principal	Amount			G5 Program Award # *
Pell, ACG, SMART, TEACH	Program / Award Year	Principal		3875FNOYR	69020	
	Program / Award Year	Imputed Interest		1435RNOYR	64020	
Direct Loan (do not use for estimated loss)	Award Year	Principal		3875FNOYR	69020	
	Award Year	Imputed Interest		4253XNOYR	53040	

Comments:

* G5 Award # (P063P104306, first 5 digits = program, next 2 digits = award year, next 4 digits = code unique to school). Note: It is important that the year in the G5 award number correspond to the award year for which any adjustments are being made, or for which the balance has been incurred (in the case of an unsubstantiated cash or negative cash balance). If the reviewer is unsure after looking in G5, contact Susan Lewey for Pell or DL, or Tremia Haythe for FWS or FSEOG.

Example of G5 award numbers for a single school for the 2009-2010 award year, Pell vs. DL:

Pell is designated by "P063P" and DL is designated by "P268K"

P063P091445 (Pell 2009-2010 award - Pell uses the final two digits of the leading award year in the award number)

P268K101445 (Direct Loan 2009-2010 award - DL uses the final two digits of the trailing award year in the award number)

Example of G5 award number for FWS and FSEOG

FWS is designated by "P033A" and FSEOG is designated by "P007A"

P033A092121 (FWS 2009-2010 award - FWS uses the final two digits of the leading award year in the award number)

P007A092121 (FSEOG 2009-2010 award - FSEOG uses the final two digits of the leading award year in the award number)

See FPRD Distribution Form for distribution information for this form and related program review documents.



March 12, 2014

Dr. Cynthia A. Bioteau
President
Florida State College at Jacksonville
501 West State Street
Jacksonville, Florida 32202-4030

UPS Tracking Number
1ZA879640190020642

RE: **Final Program Review Determination**
OPE ID: 00148400
PRCN: 201240428075

Dear Dr. Bioteau:

The U.S. Department of Education's (Department's) School Participation Division- Atlanta issued a program review report on November 7, 2012 covering Florida State College at Jacksonville's (FSCJ) administration of programs authorized by Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2010-2011 and 2011-2012 award years. FSCJ's response was received on January 8, 2013. A copy of the Program Review Report (and related attachments) and FSCJ's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by FSCJ 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: (1) identify liabilities resulting from the findings of this program review report, (2) provide instructions for payment of liabilities to the Department, (3) notify the institution of its right to appeal, and (4) close the review.

The total liabilities due from the institution from this program review are **\$3,446,587**. This FPRD contains detailed information about the liability determination for all findings.

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 finding in the attached report does not contain any student PII. Instead, the finding references

Federal Student Aid

AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

School Participation Division - Atlanta

61 Forsyth Street Room 18740

Atlanta, Georgia 30303-8918

students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Student Sample.

Appeal Procedures:

This constitutes the Department's FPRD with respect to the liabilities identified from the November 7, 2012 Program Review Report. If FSCJ wishes to appeal to the Secretary for a review of financial liabilities established by the FPRD, the institution must file a written request for an administrative hearing. Please note that institutions may appeal financial liabilities only. The Department must receive the request no later than 45 days from the date FSCJ receives this FPRD. An original and four copies of the information FSCJ submits must be attached to the request. The request for an appeal must be sent to:

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

FSCJ's appeal request must:

- (1) indicate the findings, issues and facts being disputed;
- (2) state the institution's position, together with pertinent facts and reasons supporting its position;
- (3) include all documentation it believes the Department should consider in support of the appeal. An institution may provide detailed liability information from a complete file review to appeal a projected liability amount. Any documents relative to the appeal that include PII data must be redacted except the student's name and last four digits of his / her social security number (please see the attached document, "Protection of Personally Identifiable Information," for instructions on how to mail "hard copy" records containing PII); and
- (4) include a copy of the FPRD. The program review control number (PRCN) must also accompany the request for review.

If the appeal request is complete and timely, the Department will schedule an administrative hearing in accordance with § 487(b)(2) of the HEA, 20 U.S.C. § 1094(b)(2). The procedures followed with respect to FSCJ's appeal will be those provided in 34 C.F.R. Part 668, Subpart H. **Interest on the appealed liabilities shall continue to accrue at the applicable value of funds rate, as established by the United States Department of Treasury, or if the liabilities are for refunds, at the interest rate set forth in the loan promissory note(s).**

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the

end of the retention period otherwise applicable to the record under 34 C.F.R. §§ 668.24(e)(1), (e)(2), and (e)(3).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact Jon Finkelstein at 404-974-9341. Questions relating to any appeal of the FPRD should be directed to the address noted in the Appeal Procedures section of this letter.

Sincerely,

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

Charles Engstrom
Division Director

Enclosure:
Protection of Personally Identifiable Information

cc: Ms. Aquila Galgon, Acting Financial Aid Administrator
FL State Board of Community College System
Southern Association of Colleges and Schools Commission on Colleges

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

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

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

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

Hard copy files and media containing PII must be:

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

PII data cannot be sent via fax.

Prepared for

Florida State College at
Jacksonville

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

PROUD SPONSOR of
the AMERICAN MIND™

OPE ID 00148400
PRCN 201240428075

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

Final Program Review Determination

March 12, 2014

Federal Student Aid, Atlanta School Participation Division
61 Forsyth Street Room 18F40
Atlanta, Georgia 30303-8918
www.FederalStudentAid.gov

Table of Contents

	Page
A. Institutional Information.....	2
B. Scope of Review.....	3
C. Findings and Final Determinations.....	4
Resolved Findings.....	4
Findings with Final Determinations.....	4
Finding 1: Title IV Aid Disbursed for Coursework not Required for Degree/Certificate.....	5
D. Summary of Liabilities.....	21
E. Payment Instructions.....	22
F. Appendices	
Appendix A: Combined Student Sample (2010-2011 and 2011-2012)	
Appendix B: Program Review Report	
Appendix C: Program Review Response	
Appendix D: Department Response to FSCJ Response	
Appendix E: Projected Pell, Academic Competitiveness Grant (ACG) and Federal Supplemental Educational Opportunity Grant (FSEOG)	
Appendix F: Estimated Loss Description	
Appendix G: FSCJ File Review Spreadsheet - 2011	
Appendix H: FSCJ File Review Spreadsheet - 2012	
Appendix I: Statistical Sample Projection Matrix - 2011	
Appendix J: Statistical Sample Projection Matrix - 2012	
Appendix K: Cost of Funds 2010-2011 Projection	
Appendix L: Cost of Funds 2011-2012 Projection	
Appendix M: Estimated Actual Loss 2011 and 2012	
Appendix N: FedWire Instructions	

A. Institutional Information

Florida State College at Jacksonville
501 West State Street
Jacksonville, Florida 32202-4030

Type: Public

Highest Level of Offering: Bachelor Degree

Accrediting Agency: Southern Association of Colleges and Schools Commission on Colleges

Current Student Enrollment: 55795 (2011-2012)

% of Students Receiving Title IV, HEA funds: 37.7% (2011-2012)

Title IV, HEA Program Participation – Postsecondary Educational Participants System (PEPS)

2011-2012

Federal Pell Grant Program	\$ 54,114,767
Federal Direct Loan Program (FDLP)	\$ 46,979,332
Federal Work Study Program	\$ 753,940
Federal Supplemental Educational Opportunity grant (FSEOG)	\$ 481,546
Total:	\$102,329,585

Default Rate FDLP:	2011	13.6%
	2010	12.6%
	2009	12.6%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Florida State College at Jacksonville (FSCJ) from July 30, 2012 to August 3, 2012. The review was conducted by Jon Finkelstein and Patricia Gilbert.

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

A sample of 30 files was identified for review from the 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 student numbers of the students whose files were examined during the program review. A Program Review Report was issued on November 7, 2012.

Disclaimer:

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

C. Findings and Final Determinations

Resolved Findings

Findings 2, 3, 4, 5, 6, 7, 8, 9 and 10

FSCJ has taken the corrective actions necessary to resolve findings 2, 3, 4, 5, 6, 7, 8, 9 and 10 of the Program Review Report. Therefore, these findings may be considered closed. Appendix C contains FSCJ's response to the Program Review Report. Included in this response is FSCJ's corrective action and applicable policy and procedures documents. Findings requiring further action by FSCJ are discussed below.

Findings with Final Determinations:

The Program Review Report finding (Finding 1) requiring further action is summarized below. At the conclusion of the finding is a summary of FSCJ's response to the finding and the Department's final determination for that finding. A copy of the Program Review Report issued on November 7, 2012 is attached as Appendix B.

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

Finding 1: Title IV Aid Disbursed for Coursework not Required for Degree/Certificate

Citation 34.C.F.R. § 668.32 (a)(1)(i) states a student is eligible to receive Title IV, HEA program assistance if the student is a regular student enrolled, or accepted for enrollment, in an eligible program at an eligible institution.

The 2012-2013 Federal Student Aid Handbook, Volume 1, pp.14 states that if a student is enrolled in courses that do not count toward his/her degree, they cannot be used to determine enrollment status unless they are eligible remedial courses. This means that FSCJ cannot award a student aid for classes that do not count toward his/her degree or certificate.

The 2011-2012 Federal Student Aid Handbook, Volume 1, pp.69 states that a student may apply for a Stafford or PLUS loan for coursework that the school has documented is necessary for the student to enroll in an eligible program. The courses must be part of an eligible program otherwise offered by the school, though the student does not have to be enrolled in that program. If enrolled at least half time in these prerequisite courses, the student is eligible for loans for one consecutive 12 month period (not per program) beginning on the first day of the loan period. If the period of prerequisite courses spans

more than one academic year, the student may receive multiple loans. To be eligible for loans under this exception, the student must be taking classes that are a prerequisite for admission. If the student is only taking courses to raise his/her GPA in order to be admitted, the student would not qualify for the loans.

Noncompliance: During the review, several instances of multiple degree changes were detected in the student database (ORION). The majority of these changes did not demonstrate student intent. Each student in question had no documentation of a Program Objective Change Form. The program changes were generated by an institutional automated program of study (POS) process or by an academic advisor. As such, Title IV aid was disbursed for coursework not required for a student's intended program of study.

In the interest of brevity, please note that the Department limited the number of students included in Finding 1 in the Program Review Report drafted on November 7, 2012. The Department did not include all instances of Title IV Aid Disbursed for Coursework Not Required for Degree/Certificate discovered during the file review process. In addition, the Department received comprehensive information from a former FSCJ employee documenting the intent and scope of the POS automated system. The students identified after FSCJ's response and additional Department analysis are as follows:

Student 1 – The noncompliance section of the Program Review Report stated that the ARTEMIS College Application screen (My Advisor) shows a Program Objective of B398 (Billing and Coding Program). The ORION Browse Student Objective History Screen indicates a 999 code as the transfer code for the Associates in Arts Program (1108). This code is used for operations performed by the automated POS system. The ORION Select Student Program Objective screen shows an asterisk next to the Billing and Coding Program (B398). The asterisk indicates that the student chose the program of study at entry or initiated a Program Degree Change Form.

The Billing and Coding Program is a limited access program that requires the completion of specific prerequisite courses. The coursework taken in the fall 2010 and spring 2011 terms were not part of the Billing and Coding curriculum. Title IV aid was paid to the student for both terms.

FSCJ's response stated that the student met with an advisor on August 31, 2010. The advisor added Nursing R.N. (2149) as the student's POS after the first term advising session (ORION Browse Student Objective History screen). There was no Program Objective Change Form reflecting the student's intent to enter the Nursing R.N. program. The response went on to say, "The student went through the auto POS program on October 15, 2010. Because the student was not accepted into the Nursing R.N. program, the auto POS program changed the student's primary POS from Nursing R.N. to Associate in Arts (code 1108). However, as noted above, the courses the student was enrolled in were required for the Nursing R.N. program. Because the courses are required for most, if not all majors, they also met the requirements for the Associate of

Arts POS – FSCJ’s general degree program. Accordingly, all of the classes were financial aid eligible regardless of whether the student’s POS was Nursing R.N. or Associate of Arts.”

In a letter dated March 19, 2013, the Department responded to FSCJ’s response. The Department’s letter stated that Student 1 was required to enroll in prerequisite coursework prior to being admitted into the R.N. Nursing Program (program of intent). The student was not admitted to the R.N. Nursing Program. The auto POS adjustment adding the Associate of Arts Program did not qualify the student for Title IV aid. The student did not initiate a change in degree or intend to enroll in the Associate of Arts Program.

Per the 2011-2012 Student Aid Handbook, the student was not eligible for aid until she was admitted and enrolled as a regular student in an eligible program (R.N. Nursing). In addition, the student only received Pell Grant funds, thus the exception for loan eligibility does not apply.

The full liability for this student is as follows:

Student Number	Fall 2010	Spring 2011	Total
1	\$2,775 – Pell Grant	\$1,850 – Pell Grant	\$4,625.00

Student 5: The noncompliance section of the Program Review Report stated that the ARTEMIS College Application Objective field indicates the Certificate in Business Administration Program (6251) as the entry program. The ORION Select Student Program Objective screen shows an asterisk next to the Business Management Technical Certificate Program (6251). The asterisk indicates that the student chose the program of study at entry or initiated a Program Degree Change-Form. The ORION Objective History Screen indicates a 999 code as the transfer major code (concurrent A.S.) for the Associates in Arts Program (code 1108). This code is used for operations performed by the automated POS system. The effective term for both programs is 200902. The advisor comment screen from ARTEMIS shows a comment on July 6, 2011 made by Walter Jones that states the following. “Ms. Lowe’s office visit was for the purpose of initiating a financial aid appeal for a low completion rate (66%) for the (1108) A.A. Degree program of study. Student has 10 credits remaining in her program of study to complete it and is missing 2 prerequisite courses (ACG 2071 & ECO2023) for the Business major.”

Upon completion of the 20121 term, the student initiated a Program Objective Change Form to enter the B.S. in Business Administration Program - asterisk on the Select Student Program Objective screen. During a visit to the Welcome Center, another advisor (Arnold Carreiro) added the A.S. in Business Administration Program (2213) for the spring 2012 term (20122 - no asterisk). This was added after the student graduated

from the A.S. in Arts Program (1108). This system change facilitated financial aid for the 20122 term as the registered courses were part of the A.S. in Business Administration Program requirements (prerequisites for the B.S. in Business Administration Program).

FSCJ's response stated that on September 29, 2008 the student spoke with an advisor (Frank Heinze). As a result of the meeting, the advisor changed the student's primary POS to Associate in Arts (objective 1108) with a transfer major in Business Administration (objective 202).

The student met with an advisor on July 6, 2011 (Walter Jones). During this meeting the advisor indicated that the student needed courses ACG2071 and ECO2023 in order to be accepted into her transfer major (Business Administration, code 202). These two courses can be taken as electives meeting a requirement for the Associate in Arts degree, the student's primary objective. The student registered for these two courses. The student's intended POS remained the same (primary objective Associate in Art – 1108, transfer major Business Administration – 202) until she graduated from the Associate of Arts Program.

Prior to graduation from the Associate in Arts program, the student submitted an application for a bachelor Degree in Business Administration (T200) on December 15, 2011. The application was for admission into the summer 2012 term (20123). The student was not admitted into the program.

Since the student had graduated from the Associate in Arts program and had not been accepted into the Business Administration program, the student did not have an active program of study as of January 2012. The student met with a Welcome Center Advisor (Arnold Carreiro) on January 5, 2012. The advisor wrote that the student requested a program change to Associate in Science Business Administration (objective code 2213). The student was advised to complete a Change Form, although she never did. However, based on the meeting, the advisor updated the student's primary POS to indicate the student's intent.

In a letter dated March 19, 2013, the Department responded to FSCJ's response. The Department's letter stated that there is evidence in the documentation included in FSCJ's response to verify that the student was pursuing the Associate of Arts Program (objective code 1108) with a transfer major in Business Administration (objective code 202). The primary documentation attesting to the programs of study are the comment in the advisement log on July 6, 2011 and the awarding of the Associates in Arts Degree on December 16, 2011 (20121).

There is evidence in the documentation included in FSCJ's response to verify that the student was advised to submit a Program Objective Change Form for the Associates in Business Administration Program (objective code 2213). The comment on January 5, 2012 attests to the advisor requesting a Program Objective Change Form for the

Associate in Business Administration Program. The comment states, "student does not have an active POS for 20122 (spring 2012), so student will submit a POS change form and then check financial aid status."

The student's documentation, however, does not include a Program Objective Change Form for the A.S. in Business Administration Program. The student's documentation does include a Bachelor's Degree Application for Student Membership for the B.A.S. in Business Administration Program (T200) effective summer 2012 (20123). This application was signed at the end of the fall 2011 term. The advisor's assignment for the Associates in Business Administration Program was added on January 5, 2012 to facilitate financial aid eligibility for the B.A.S. in Business Administration prerequisite coursework (MAN2012 and FIN2000) taken during the spring 2012 semester. As such, the student was not eligible for Pell Grant for the spring 2012 semester (20122).

The student was awarded Pell Grant and Direct Loan funds for the spring 2012 semester (20122). The provision mentioned earlier allows the student to receive Direct Loan funds for coursework the school has documented is necessary (prerequisites) for the student to enroll in an eligible program.

The student was included in the 2010-2011 statistical sample. The ineligible funds disbursed during the 2011-2012 award year are not included in the 2010-2011 liability projection for ineligible Pell Grant disbursements. The ineligible 2011-2012 Pell Grant funds (\$975.00) are in theory included in the liability projection total for the 2011-2012 award year.

Student 9: The noncompliance section of the Program Review Report stated that the Florida State College Application for Student Membership (dated August 27, 2010) did not list a major. The ARTEMIS Membership Application Report lists 2149 (A.S. Nursing – RN) as the major under the Educational Plans section. The A.S. in Nursing is a limited access program. The Orion Select Student Program Objective screen has an asterisk next to Program ID 2149. The asterisk indicates that the student chose this program at entry or initiated a Program Degree Change Form.

The Associate of Arts Program (1108) was automatically populated by the POS system and placed first in the listing of programs on the Browse Student Objective History screen. This placement facilitates Title IV eligibility for coursework that is not included in the A.S. Nursing - RN Program (student's program of intent). The U.S. History to 1865 (AMH2010) course is neither required or an eligible elective in the A.S. Nursing (2149) Program. This course was not eligible for Title IV aid.¹

¹ Upon further review, the Program Review Report was amended. The initial report limited the ineligible coursework to AMH 2010 (spring 2011). The student was not accepted into the Nursing R.N. program (program of intent). As such, all coursework was ineligible for Pell Grant funds.

FSCJ's response stated that the student completed a web application for college credit on July 1, 2010 indicating Nursing R.N. as her primary POS. Subsequently, on August 27, 2010, the student completed a paper application. The paper application indicated a general degree (student checked the college degree circle and did not indicate a major). As noted above, FSCJ's general degree is the Associate of Arts (objective code 1108).

Although the application is stamped "ENTERED" indicating that the information has been entered into the ORION system, an error was made and the application information was never actually entered into the system. Accordingly, the student's intended POS was never added/updated on the system.

On February 25, 2011, the student was run through the auto POS program which updated the student's primary POS to the Associate of Arts degree. However, this is the degree program that should have already been in the ORION system based on the most recent application. Accordingly, although auto POS did change the student's primary POS, the change was in fact in line with the student's most recently expressed intended POS.

All courses taken in spring of 2011, including AMH2010, counted towards the Associate of Arts degree. As such, the AMH2010 class can be used in the enrollment status calculation and the student should not be in the list of affected students.

In a letter dated March 19, 2013, the Department responded to FSCJ's response. The Department's letter stated that documentation collected during the review included a Membership Application Report. This report included the major code 2149 (Nursing R.N.) under the Educational Plans Section. In addition, per the FSCJ's response, the auto POS system did not update the student's records with the Associate of Arts Program (objective code 1108) until February 25, 2011. The documentation and response did not provide sufficient evidence to verify that the Associate of Arts Program was the student's program of intent.

The student's enrollment spanned the fall 2010 and spring 2011 semesters. The spring 2011 semester began prior to the POS assignment of the Associate in Arts Program. As such, the student was pursuing the R.N. Nursing Program and had not met the requirements for admission. The coursework taken during the fall 2010 and spring 2011 semesters was not eligible for Title IV aid. The auto POS assignment (objective 1108) is irrelevant as the student did not initiate a change (Program Objective Change Form) to enroll in the Associate of Arts Program (1108) and the change was not initiated prior to the student's enrollment in the fall 2010 and spring 2011 semesters.

The argument presented by FSCJ regarding the checkmark next to the general degree on the Application for Student Membership does not justify an automatic assignment to the Associate of Arts Program. There is a space on the application to list a major. The space was blank. As such, the only clear indicator of student program intent was the web application completed on July 1, 2010 (Nursing R.N.).

Per the 2011-2012 Federal Student Aid Handbook, the student was not eligible for aid until she was admitted and enrolled as a regular student in an eligible program (R.N. Nursing). On the date of the auto POS adjustment (February 25, 2011 – Associate of Arts), the effective term was backdated to the summer of 2010 (20103). This action was done to facilitate financial aid eligibility.

The student only received Pell Grant and Academic Competitiveness Grant (ACG) funds, thus the exception for loan eligibility does not apply.

The full liability for this student is as follows:

Student Number	Fall 2010	Spring 2011	Total
9	\$2,775 - Pell Grant \$ 375 - ACG	\$1,387 - Pell Grant \$ 188 - ACG	\$4,162 - Pell Grant \$ 563 - ACG

Student 19: The noncompliance section of the Program Review Report stated that the Student Select Program Objective screen shows an asterisk next to the Personal Enrichment (8403 - 200802), Supervision and Management (S100 – 20123), and Computer Integrated Manufacturing (2165 - 20063) Programs. The asterisks indicate that the programs were selected by the student.

The Browse Student Objective History screen shows the Associate in Arts Program (1108) listed first. This placement facilitates Title IV eligibility for coursework outside of the student's program of intent but within the coursework required for the Associate of Arts Program.

The Maintain Student Program Objective screen shows an effective term of 20112 for the Pharmacy Technician Program (B300). The student began his coursework in B300 in the spring 2010 semester (20102). The transcript shows a switch of major for one semester – fall of 2010 (20111) – Associate in Arts – 1108. The student immediately returned to B300 the following semester (20112) to complete the certificate. There is no evidence that the student intended to enter the Associate of Arts Program in fall of 2010. The student was not eligible for Title IV aid during the fall 2010 semester.

FSCJ's response stated that this student submitted a Change Form through the Department of Veterans Affairs in August 2010 to be effective for the fall 2010 term (20111). On the form the student requested a change to the Associate in Arts POS. The request was effectuated by an advisor (Susan Brown) and noted in the Comment Log for this student. Accordingly, despite the lack of an asterisk next to the Associate in Arts objective code (1108), the student indicated the POS change to Associate in Arts, thus the change demonstrated the student's intent.

In a letter dated March 19, 2013, the Department responded to FSCJ's response. The response stated that the Department of Veterans Affairs Request for Change of Program or Place of Training form was not provided to the reviewers during the program review. Upon review, this form is sufficient to demonstrate that the student requested a POS change to the Associate of Arts Program effective fall 2010 semester (20111).

The student graduated with an A.S. in Computer Integrated Manufacturing at the conclusion of the fall 2009 semester. The ORION Select maintain Student Program Objective screen indicates that student was admitted to the Engineering Technology Program effective fall 2009. The ORION Select Maintain Student Program Objective Screens also indicates that the student was admitted to the ATD Pharmacy Technician Program (B300) effective the spring 2011 semester (20112). The unofficial transcript demonstrates that the student was taking coursework in the ATD Pharmacy Technician Program (B300) during the spring 2010 semester. This enrollment was prior to the student's admissions date into the Pharmacy Technician Program.

Coursework taken during the spring 2010 that counted toward the Engineering Technology Program would have been eligible for Title IV aid. All of the coursework taken during the spring 2010 semester only counted toward the Pharmacy Technician Program and is therefore not eligible for Title IV aid. The coursework is as follows:

Human Biology (BSC2020C)
Medical Terminology for Health Professionals (HSC1531)
Introduction to Information Technology (CGS1060)

The student was included in the 2011-2012 statistical sample. The ineligible funds disbursed during the 2009-2010 award year are not included in this report as a liability. The 2009-2010 award year was not a year under review.

Student 24: The noncompliance section of the Program Review Report stated that the ARTEMIS College Application Objective field indicates the A.S. in Nursing Program (2149) as the entry program. The ORION Select Student Program Objective screen shows an asterisk next to the Nursing R.N. Program (2149). The asterisk indicates that the student chose the program of study at entry or initiated a Program Degree Change Form. The ORION Browse Student Objective History Screen indicates a 999 code as the transfer code for the Associates in Arts Program. This code is part of the automated POS system. The effective term for both programs is 20111. The Associate of Arts Program was automatically entered as the primary program by the POS system. By doing so, coursework taken outside of the A.S. in Nursing Program (prerequisites and electives) would qualify for student financial aid. The A.S. in Nursing Program is a limited access program.

An off-site interview with the student verified that the student never intended to enter the Associate in Arts Program. The student's academic advisor recommended taking the

Intermediate Algebra (MAT1033) and Principles of General Chemistry (CHM1032C) courses as prerequisites to the College Algebra (MAC1105) and the Microbiology (MCB2010C) required Nursing 2149 courses. In addition, the Strategies/Success (SLS1103) and Elementary Algebra (MAT0028) courses were added as first level remedial courses. All of these prerequisites are not eligible for Title IV aid for the Associates in Nursing Program (2149).

In a letter dated March 19, 2013, the Department responded to FSCJ's response. The Department's letter stated that FSCJ concurred with the Department's finding regarding this student. The student indicated her intent to enroll in the Nursing R.N. Program (objective code 2149) per the ARTEMIS My Advisor screen (Advising POS entered on July 19, 2010). The ORION Student Program Objective Screen indicates that the student was not accepted into the R.N. Nursing program. The lack of acceptance was due to the student not having the required prerequisites. The auto POS system added the Associate of Arts Program (objective 1108) on September 23, 2011 with an effective term of 20111 (fall 2010).

The unofficial transcripts lists coursework attempted from the fall 2010 semester (20111) through the spring 2012 semester (20122). The coursework attempted includes several of the prerequisites to the Nursing R.N. Program. The other coursework includes general education and professional courses that are required for the Nursing R.N. Program.

As the student was not accepted into the Nursing R.N program, during each of the before mentioned terms, all coursework attempted was not eligible for Title IV aid.

The original Program Review Report only listed the prerequisite courses as ineligible to receive Title IV aid. Upon further review, the Department has determined that all coursework taken from the fall 2010 semester (20111) through the spring 2012 semester (20122) was not eligible for Title IV aid.

Per the 2010-2011 Federal Student Aid Handbook, the student was not eligible for aid until she was admitted and enrolled as a regular student in an eligible program (R.N. Nursing). In addition, the student only received Pell Grant funds, thus the exception for loan eligibility does not apply.

The student was included in the 2011-2012 statistical sample. Liabilities of \$750 (Fall 2011 - \$375 Pell Grant and spring 2012 - \$375 Pell Grant) are included in the liability projection for the 2011-2012 award year. The ineligible funds disbursed during the 2010-2011 award year (\$1,437 Pell Grant) are not included in the liability projection for ineligible Pell Grant disbursements for the 2010 - 2011 award year. The ineligible 2010-2011 Pell Grant funds are in theory included in the liability projection total for the 2010-2011 award year.

The liability included in the 2011-2012 statistical sample is as follows:

Student Number	Fall 2011	Spring 2012	Total
24	\$ 375 - Pell Grant	\$ 375- Pell Grant	\$ 750

Student 27: The noncompliance section of the Program Review Report stated that the ARTEMIS College Application Objective field indicates the A.S. in Digital Media/Multimedia Technology Program (2152) as the entry program. The ORION Select Student Program Objective screen shows an asterisk next to the Digital Media/Multimedia Technology and Early Childhood Education Programs (2152 and T100). The asterisks indicate that the student chose these programs of study at entry or initiated a Program Degree Change Form. The Early Childhood Education Program showed an admit status of N (No). The student had not yet been admitted to the Early Childhood Education Program at the time of review.

The ORION Browse Student Objective History Screen indicates a 999 code as the transfer code for the Associates in Arts Program (1108). This code is part of the automated POS system. The effective term for the Digital Media/Multimedia Technology Program was 20113. The effective term for the Associate in Arts program was 20121. The student did not begin his studies until the Fall 2011 semester (20121). The Associate of Arts Program was automatically entered as the primary program by the POS system. By doing so, coursework taken outside of the Digital Media/Multimedia Technology Program (SLS1103) would qualify for student financial aid.

FSCJ's response stated that this student first applied via the web on March 18, 2011. On the application the student indicated Digital Media/Multimedia technology as his requested POS. That summer, the student had a number of conversations with various advisors. Through those conversations, his primary and transfer POS were updated. The first update occurred on June 20, 2011. On this date, an advisor (Tracey Blue) removed certain technical certificates from the student's POS (objective codes 6401, 6402, 6403). On June 21, 2011 the student's POS was updated to Associate in Arts (objective code 1108) by another advisor (Barbara Jackson). On July 13, 2011, the student completed another application for Bachelor of Science in Early Childhood Education (objective code T100). The application information was entered into the system by Linda Williams. On this date the student also spoke with an advisor (Sharon Hoose). At this time, the student's primary POS continued to be Associate in Arts and her transfer POS was undecided.

The student was run through the auto POS program on September 23, 2011. However, because Associate in Arts was already designated as his primary POS based on the student's discussions with advisors, the auto POS program did not make any changes.

Associate of Arts has been the student's primary POS starting on June 21, 2011 through the present.

In a letter dated March 19, 2013, the Department responded to FSCJ's response. The Department's letter stated that the Membership Application Report and ARTEMIS My Advisor screen clearly indicates that the student originally enrolled in the Digital Media/Multimedia Technology Program (objective code 2152). On July 13, 2011 the student completed another application for the Bachelor of Science in Early Childhood Education Degree (objective code T100). The student was not admitted into the Early Childhood Education (T100) program as of the fall 2011 term (20121). There was no evidence of a Program Objective Change Form to demonstrate that the student intended to change his POS to Associate of Arts (code 1108).

The student was only enrolled one semester (fall 2011). At no time did the student indicate intent to enroll in the Associate of Arts Program (objective code 1108). There was no evidence of a Program Objective Change Form to demonstrate that the student intended to change his POS to Associate of Arts (code 1108). The Associate of Arts program was added by an advisor based on the student's course selection for the fall 2011 term.

The student enrolled in SLS1103 – Strategies/Success in College. This course is not counted in the requirements for the Digital Media/Multimedia Technology Program. As such, it is not eligible for Title IV aid. The student was paid a three quarter time Pell Grant. The student was eligible for a half time Pell Grant. The student only received Pell Grant funds, thus the exception for loan eligibility does not apply.

The full liability for this student is as follows:

Student Number	Fall 2011	Total
27	\$ 400.00 - Pell Grant	\$ 400.00

Required Action: Based upon the error rate of this finding, FSCJ was required to conduct a 100% file review of all Title IV recipients who had a primary program of study populated by the auto POS system (and/or advisor) that did not reflect the student's program of intent. FSCJ was required to report all coursework for affected students that were not required for the student's program of intent. Additionally, FSCJ was required to report all Title IV aid that was awarded for coursework not required for the student's program of intent.

In lieu of performing a file review for the entire population of Title IV recipients who had a program of study populated by the auto POS system (and/or advisor) that did not reflect the student's program of intent, FSCJ chose to perform this file review for only the remainder of the statistical sample not identified by the Department in the Program Review Report. The results from this file review using the statistical sample are being

used to project liabilities for the entire population (i.e., the average liability for the recipients in the statistical sample will be multiplied by the entire population).

FSCJ's Response: FSCJ performed a file review of the statistical sample of students who received Title IV aid during the review period. The file review identified several additional students from the 2010-2011 and 2011-2012 award year that had a primary program of study populated by the auto POS system/advisor that did not reflect the student's program of intent. In each instance, FSCJ paid Title IV funds to students for ineligible coursework.

Final Determination:

FSCJ disputed Finding 1 of the Program Review Report for students 1, 3, 5, 9, 19, 22, and 27. FSCJ concurred with the finding for student 24. The Department, in a letter dated March 29, 2013, agreed with FSCJ's assessment for students 3, and 22. The findings for students 3 and 22 were removed.

Upon subsequent review, the Department partially agreed with FSCJ's assessments for student 5 and 19. The finding for student 5 and 19 was revised. In addition, upon further review, the ineligible coursework was updated for student 24. The finding for student 24 was also revised.

FSCJ must discontinue its use of the auto POS system. In addition, FSCJ should collect and maintain clear documentation of each student's intended program of study (Application for Membership and Program Objective Change Form).

The Department has accepted the results of the file review conducted by FSCJ in response to this finding. FSCJ must return the amount of ineligible Title IV aid for the students identified from the statistical sample file review as well as the students identified from the sample used in the program review.

FSCJ chose to limit its review of students to the statistical sample provided by the Department. A statistical sample is defined as a group of records selected in a random, unbiased manner from an unduplicated target population or universe. FSCJ provided the target population of students receiving Title IV aid in its submission of its 2010-2011 and 2011-2012 recipient data spreadsheets. Liability projections for the target population or universe are calculated from the data in the statistical sample.

The estimated amount of liabilities (Pell Grant) owed by an institution is based on the following formula:

$$\text{Liabilities in Statistical Sample} / \text{Statistical Sample Size} \\ \times \text{Target Population Size}$$

The students included in this report that were identified as receiving Title IV aid for coursework not required for their program of study in the 2010-2011 and 2011-2012 award years are as follows:

Student's Name	Ineligible Term 2010-2011	Ineligible Pell Gant	Ineligible Academic Competitiveness Grant (ACG)	Ineligible Subsidized Stafford	Ineligible Unsubsidized Stafford
Sample Student #1	Fall 2010 Spring 2011	\$ 2,775 \$ 1,850			
Sample Student #9	Fall 2010 Spring 2011	\$ 2,775 \$ 1,387	\$ 375 \$ 188		
(b)(6); (b)(7)(C)		\$ 694			
		\$ 693			
		\$ 694			
		\$ 693			
		\$ 693	\$ 162		
		\$ 1,387			
		\$ 693			
		\$ 693		\$ 855	
				\$ 2,029	\$ 2,631
		\$ 693		\$ 1,750	\$ 3,000
		\$ 487			
		\$ 694			
		\$ 450		\$ 2,250	
		\$ 1,147			
		\$ 537		\$ 2,250	
		\$ 487			
		\$ 2,082			
		\$ 694			
		\$ 718			
				\$ 2,250	
	\$ 694				
	\$ 250				
	\$ 693				
	\$ 693				

(b)(6); (b)(7)(C)	\$ 693			
	\$ 337			
	\$ 337		\$ 2,250	\$ 3,000
			\$ 2,250	\$ 3,000
	\$ 694			
	\$ 693			
	\$ 1,620			
	\$ 693			
	\$ 1,387			
	\$ 694			
	\$ 694			
	\$ 694			
	\$ 1,200			
	\$ 600			
			\$ 1,024	
\$ 694				
\$ 531				
\$ 2,081		\$ 1,750	\$ 3,000	

Total 2010-2011 with Liability Projection (See Appendix I)

Pell Grant	\$ 38,651
ACG	\$ 725
Subsidized Stafford	\$ 18,658
Unsubsidized Stafford	\$ 14,631

Student's Name	Ineligible Term 2011-2012	Ineligible Pell Gant	Federal Supplemental Opportunity Grant (FSEOG)	Ineligible Subsidized Stafford	Ineligible Unsubsidized Stafford
Student Sample #24	Fall 2011 Spring 2012	\$ 375 \$ 375			

Student Sample #27	Fall 2011	\$ 400			
(b)(6); (b)(7)(C)		\$ 694			
		\$ 694			
		\$ 1,089			
				\$ 2,750	\$ 821
		\$ 694			
		\$ 2,775	\$ 400		
		\$ 2,775	\$ 400		
				\$ 1,750	\$ 3,000
		\$ 48		\$ 2,250	
		\$ 2,082			
		\$ 2,082			
		\$ 745			
		\$ 693			
		\$ 693			
		\$ 1,200			
		\$ 562			
		\$ 562			\$ 3,000
		\$ 413			
		\$ 694			
					\$ 1,000
\$ 694					
\$ 238					
\$ 1,387		\$ 1,500	\$ 2,000		
\$ 694		\$ 1,896			

(b)(6); (b)(7)(C)	\$ 693			
			\$ 1,625	
	\$ 694			
				\$ 2,250
	\$ 693			\$ 2,250

Total 2011-2012 with Liability Projection (see Appendix J)

Pell Grant	\$ 24,738
FSEOG	\$ 800
Subsidized Stafford	\$ 11,771
Unsubsidized Stafford	\$ 14,321

The projected ineligible 2010-2011 and 2011-2012 Title IV Federal Pell Grant, ACG Grant and FSEOG Grant for this finding are reported in the tables below. The sample projection calculations are outlined in Appendix G (2011) and H (2012).

Federal Pell Grant 2010-2011	Academic Competitiveness Grant	Cost of Funds Pell Grant	Cost of Funds ACG
\$1,840,120	\$ 34,547	\$ 27,781	\$ 522

Federal Pell Grant 2011-2012	Supplemental Educational Opportunity Grant (FSEOG)	Cost of Funds Pell Grant	Cost of Funds FSEOG
\$1,380,645	\$ 44,647	\$ 7,074	\$ 172

As noted in the before mentioned tables, FSCJ is also required to repay the Cost of Funds (COF) on the projected ineligible Federal Pell Grant disbursements. The COF is the expense the Department incurred as a result of FSCJ retaining ineligible funds. The rate of interest is based on when the funds should have been returned to the Department. A copy of the COF calculation is included in Appendix I (2011) and Appendix J (2012) of this report.

FSCJ is liable for these amounts and must pay the Department. A full accounting of the total liability amount will be discussed in the Summary of Liabilities section of this report. Instructions for repayment of this liability are included in the Repayment section of this report.

The estimated actual loss formula was developed to provide the Department with an estimate of its costs or potential costs as a result of institutions disbursing ineligible loans. The Department directly or indirectly incurs for the ineligible amount of that loan both an interest subsidy cost and the risk of loss from default by the borrower. The institution bears those costs and the risks, rather than the Department.

A key component in the estimated loss formula is the institutions cohort default rate (CDR). The CDR used in the formula is the one most applicable for the review. In the majority of cases, this will be the latest available CDR.

The latest available CDR for FSCJ is the 2011 rate. The 2011 CDR for FSCJ is as follows:

FFEL/Direct – 13.6%

A full description of the Estimated Loss calculation is included in appendix F of this report.

The estimated loss FSCJ must pay to the Department for the 2010-2011 ineligible loans is **\$ 37,322**. A copy of the results of this calculation is included in Appendix N. A full accounting of the total liability amount for Finding 1 will be discussed in the Summary of Liabilities section of this report.

The estimated loss FSCJ must pay to the Department for the 2011-2012 ineligible loans is **\$ 73,757**. A copy of the results of this calculation is included in Appendix N. A full accounting of the total liability amount for Finding 1 will be discussed in the Summary of Liabilities section of this report.

D. Summary of Liabilities

The liabilities from the findings in the program review determination are as follows. The liabilities for each finding have been separated. The total liability is also provided.

Finding 1 Sample Projection	Pell Grant	ACG – 2010 -2011 SEOG – 2011 - 2012	Cost of Funds - Pell Grant	Cost of Funds – ACG – 2011 FSEOG 2012	Estimated Actual Loss - (Loans)	Total
2010-2011	\$1,840,120	\$ 34,547	\$ 27,781	\$ 522	\$ 37,322	\$1,940,292
2011-2012	\$1,380,645	\$ 44,647	\$ 7,074	\$ 172	\$ 73,757	\$1,506,295

Summary of Liabilities

\$ 1,940,292 2011 Award Year Sample Projection
 \$ 1,506,295 2012 Award Year Sample Projection

Total **\$ 3,446,587**

E. Payment Instructions

Liabilities Owed to the Department

FSCJ owes to the Department **\$3,446,587**. This liability must be paid using an electronic transfer of funds through the Treasury Financial Communications System, which is known as FEDWIRE. FSCJ must make this transfer within **45 days of the date of this letter**. This repayment through FEDWIRE is made via the Federal Reserve Bank in New York. If FSCJ’s bank does not maintain an account at the Federal Reserve Bank, it must use the services of a correspondent bank when making the payments through FEDWIRE.

Any liability of \$100,000 or more identified through a program review must be repaid to the Department via FEDWIRE. The Department is unable to accept any other method of payment in satisfaction of these liabilities.

Payment and/or adjustments made via G5 will not be accepted as payment of this liability. Instead, the school must first make any required adjustments in COD as required by the applicable finding(s) and Section II – Instructions by Title IV, HEA Program (below), remit payment, and upon receipt of payment the Department will apply the funds to the appropriate G5 award (if applicable).

Instructions for completing the electronic fund transfer message format are included on the attached FEDWIRE form (Appendix O).

E. Payment Instructions

Terms of Payment

As a result of this final determination, the Department has created a receivable for this liability and payment must be received by the Department within **45 days of the date of this letter**. If payment is not received within the 45-day period, interest will accrue in monthly increments from the date of this determination, on the amounts owed to the Department, at the current value of funds rate in effect as established by the Treasury Department, until the date of receipt of the payment. FSCJ is also responsible for repaying any interest that accrues. If you have any questions regarding interest accruals or payment credits, contact the Department's Accounts Receivable Group at (202) 245-8080 and ask to speak to FSCJ's account representative.

If full payment cannot be made within 45 days of the date of this letter, contact the Department's Accounts Receivable Group to apply for a payment plan. Interest charges and other conditions apply. Written request may be sent to:

U.S. Department of Education
OCFO Financial Management Operations
Accounts Receivable Group
550 12th Street, S.W., Room 6114
Washington, DC 20202-4461

If within 45 days of the date of this letter, FSCJ has neither made payment in accordance with these instructions nor entered into an arrangement to repay the liability under terms satisfactory to the Department, the Department intends to collect the amount due and payable by administrative offset against payments due FSCJ from the Federal Government. **FSCJ may object to the collection by offset only by challenging the existence or amount of the debt.** To challenge the debt, FSCJ must **timely appeal** this determination under the procedures described in the "Appeal Procedures" section of the cover letter. The Department will use those procedures to consider any objection to offset. **No separate appeal opportunity will be provided.** If a timely appeal is filed, the Department will defer offset until completion of the appeal, unless the Department determines that offset is necessary as provided at 34 C.F.R. § 30.28. This debt may also be referred to the Department of the Treasury for further action as authorized by the Debt Collection Improvement Act of 1996.

Appendix A
Combined Student Sample

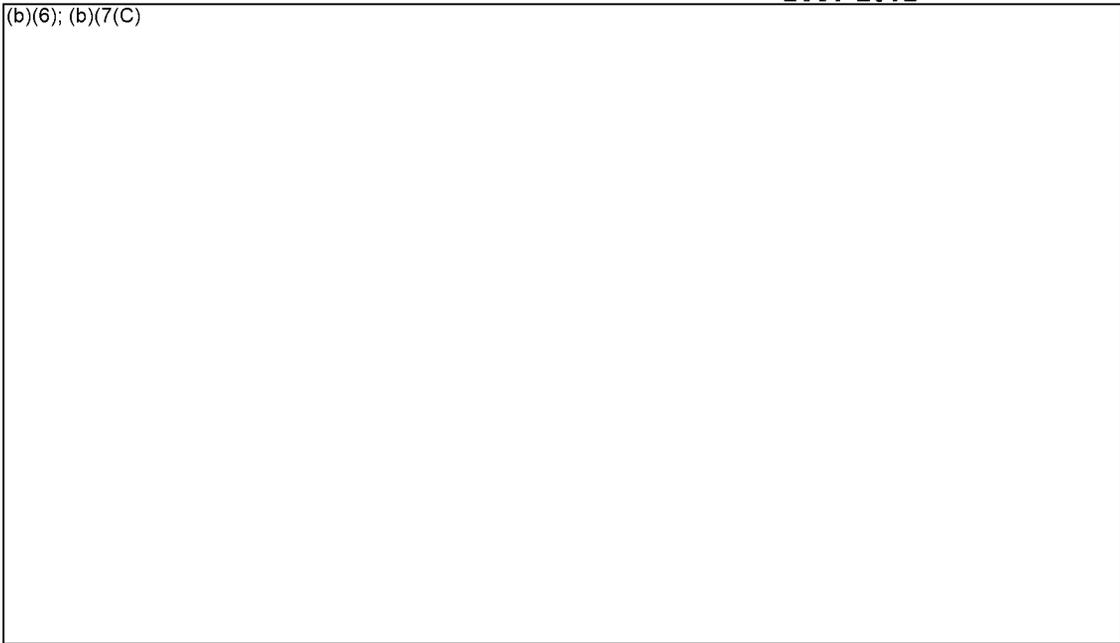
Appendix A

Student Sample
Florida State College at Jacksonville

2010-2011

2011-2012

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



Appendix B
Program Review Report

Appendix B

Prepared for

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

**Florida State College at
Jacksonville**

**OPE ID 00148400
PRCN 201240428075**

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

Program Review Report
November 7, 2012

Atlanta School Participation Division
61 Forsyth St. SW, Room 18T40
Atlanta GA 30303-8918
www.FederalStudentAid.ed.gov

Table of Contents

	Page
A. Institutional Information.....	2
B. Scope of Review.....	3
C. Findings	4
Finding 1: Title IV Aid Disbursed for Coursework Not Required For Degree/Certificate	
Finding 2: Ineligible Student – Not Making Satisfactory Academic Progress	
Finding 3: Verification Violations	
Finding 4: Satisfactory Academic Progress Policy Not Adequate/Incomplete	
Finding 5: Return to Title IV Policy (R2T4) Not Developed/Inadequate	
Finding 6: Verification Policy Not Documented/Missing/Inadequate	
Finding 7: Drug Abuse Prevention Program Requirements Not Met	
Finding 8: Inaccurate Recordkeeping	
Finding 9: Student Underawarded Academic Competitiveness Grant (ACG)	
Finding 10: Pell Underpayment	
D. Recommendations.....	25
E. Appendices	27
Enclosures: Protection of Personally Identifiable Information (PII)	

A. Institutional Information

Florida State College at Jacksonville
501 West State Street
Jacksonville, Florida 32202-4030

Type: Public

Highest Level of Offering: Bachelor Degree

Accrediting Agency: Southern Association of Colleges and Schools Commission on Colleges

Current Student Enrollment: 55,795 (2011-2012)

% of Students Receiving Title IV: 37.7% (2011-2012)

Title IV Participation -- Postsecondary Education Participants System (PEPS)

2010-2011

Federal Pell Grant Program	\$ 53,320,690
Federal Direct Loan Program (FDLP)	\$ 39,343,956
Federal Family Educational Loan Program (FFEL)	\$ 2,155,738
Academic Competitiveness Grant (ACG)	\$ 1,058,747
Federal Work Study Program	\$ 588,600
Federal Supplemental Educational Opportunity Grant (FSEOG)	\$ 353,551
Total:	<u>\$ 96,954,447</u>

Default Rate FDLP:	2010	12.6%
	2009	12.6%
	2008	11.7%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Florida State College at Jacksonville (FSCJ) from July 30, 2012 to August 3, 2012. The review was conducted by Jon Finkelstein and Patricia Gilbert.

The focus of the review was to determine FSCJ'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 FSCJ's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files was identified for review from the 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. In addition, 2 files were selected based on the conditions outlined in Finding 1. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review.

Disclaimer:

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

Finding 1: Title IV Aid Disbursed for Coursework Not Required For Degree/Certificate

Citation: 34 C.F.R. § 668.32 (a)(1)(i) states a student is eligible to receive Title IV, HEA program assistance if the student is a regular student enrolled, or accepted for enrollment, in an eligible program at an eligible institution.

The 2012-2013 Federal Student Aid Handbook, Volume 1, pp.14 states if a student is enrolled in courses that do not count toward his degree, they cannot be used to determine enrollment status unless they are eligible remedial courses. This means you cannot award the student aid for classes that do not count toward his/her degree or certificate.

Noncompliance: During the review, several instances of multiple degree changes were detected in the student database (ORION). The majority of these changes did not demonstrate student intent. Each student in question had no documentation of a Program Objective Change Form. The program changes were generated by an institutional automated program of study (POS) process or an academic advisor.

The following is a partial listing of affected students. A narrative discussion of each student listed is provided after the table.

Student Number	Program of Entry/Intent – Term	POS Automated Assignment – Term	Coursework Not Eligible for Title IV Aid Under Program of Entry/Intent	Ineligible Title IV Aid - Term
1	B398 Medical Coder/Biller – 20111	1108 Associate in Arts – 20111	ENC0025 MAT0018 SLS0005 ENC1101 MAT0028 PSY1012	\$2,775.00 Pell – Fall 2010 \$1,850.00 Pell – Spring 2011
3	B398 Medical Coder/Biller - 20101	1108 Associate In Arts - 20101	MAT 0028 SLS1103 CGS1100 ENC1101 BSC1005 HUM2450 MAT0028 ENG1100 HSC1531 OST1581 BSC2085C ENC1102	\$2,675.00 Pell - Fall 2009 \$2,675.00 Pell - Spring 2010 \$2,006.00 Pell - Summer 2010 \$1,988.00 Pell - Fall 2010

			MAT1033 BSC2086C DEP2004 ECO2013 MAC1105 AMH2092 SPC2608 AMH2020 POS2041 STA2023 PSY1012	\$2,650.00 Pell - Spring 2011 \$1,325.00 Pell - Summer 2011 \$2,775.00 Pell - Fall 2011 \$2,000.00 DL Subsidized Stafford -- Fall 2011
5	6251 Business Management Technical Certificate - 200902 T200 B.S. Business Administration - 20112	1108 Associate in Arts - 200902 2213 A.S. Business Administration - 20122	MAT0024 REL2300 HUM2210 MAT1033 MAC1105 PSY1012 EUH1011 STA2023 LIT2000 MAC2233 ACG2021 ART2752C ECO2013 ESC1000 ART2753C ACG2071 BSC2010C ECO2023 SPC2065 MAN2021 FIN2000	\$ 821.00 Pell - Summer 2009 \$1,750.00 FFEL Subsidized Stafford - Summer 2009 \$3,000.00 FFEL Unsubsidized Stafford - Summer 2009 \$1,338.00 Pell - Fall 2009 \$2,006.00 Pell - Spring 2010 \$ 669.00 Pell - Summer 2010 (CGS1100 Required for 6251 - Title IV Eligible) \$3,500.00 Subsidized Fall 2009/Spring 2010

				\$6,000.00 Unsubsidized Fall 2009/Spring 2010
				\$ 750.00 Pell - Fall 2010
				\$1,125.00 Pell - Spring 2011 (ECO2013 Required for 6251 - Title IV Eligible)
				\$ 375.00 Pell - Summer 2011
				\$4,500.00 DL Subsidized - Fall 2010/Spring 2011
				\$6,000.00 DL Unsubsidized - Fall 2010/Spring 2011
				\$1,950.00 Pell - Fall 2011
				\$ 487.00 Pell - Spring 2012 (MAN2021 Required for 6251 - Title IV Eligible)
				\$4,500.00 DL Subsidized - Fall 2011/Spring 2012

9	2149 A.S. Nursing (RN) - 20111	1108 Associate in Arts - 20111	AMH2010	\$ 694.00 Pell - Spring 2011 \$ 188.00 ACG - Spring 2011
19	B300 ATD Pharmacy Technician - 20111	1108 Associate in Arts - 20111	ENC1102 HUM2230 MGF1106 POS2041	\$1,800.00 Pell - Fall 2010 \$2,250.00 DL Subsidized - Fall 2010
22	2152 Digital Media/ Multimedia Technology - 20111	1108 Associate in Arts - 20111	MGF1106	\$5,250.00 DL Unsubsidized - Summer 2011 (Only Eligible For PSY1012 - Student Not Enrolled 1/2 Time)
24	2149 A.S Nursing (RN) - 20111	1108 Associate in Arts - 20111	SLS1103 MAT1033 MAC1105 CHM1032C	\$ 246.00 Pell - Fall 2010 (Only Eligible for MAT0024 - EFC at ¼ time) \$ 287.00 Pell - Spring 2011 (Only Eligible for PSY1012 and ENC1101 - ½ Time) \$ 375.00 Pell - Fall 2011 - (Only eligible for SYG2000 - EFC at ¼ Time = \$0) \$ 375.00 Pell - Spring 2012 - (Only Eligible for DEP2004 - EFC at ¼ Time = \$0)

27	2152 Digital Media/Multimedia Technology - 20121	1108 Associate in Arts - 20121	ENC1101 MAC1105 SLS1103	\$ 752.00 Pell - Fall 2011
----	--	--------------------------------	-------------------------------	----------------------------

Student 1 – The ARTEMIS College Application screen (My Advisor) shows a program Objective of B398 (Billing and Coding Program). The ORION Browse Student Objective History Screen indicates a 999 code as the transfer code for the Associates in Arts Program (1108). This code is used for operations performed by the automated POS system. The ORION Select Student Program Objective screen shows an asterisk next to the Billing and Coding Program (B398). The asterisk indicates that the student chose the program of study at entry or initiated a Program Degree Change Form.

The Billing and Coding Program is a limited access program that requires the completion of specific prerequisite courses. The coursework taken in the fall 2010 and spring 2011 terms were not part of the Billing and Coding curriculum. Title IV aid was paid to the student for both terms.

Student 3 - The ARTEMIS College Application screen (My Advisor) shows a program Objective of B398 (Billing and Coding Program) at entry. The ORION Browse Student Objective History Screen indicates a 999 code as the transfer major code (concurrent A.S.) for the Associates in Arts Program (1108). This code is used for operations performed by the automated POS system. The effective term for both programs is 20101. The ORION Select Student Program Objective screen shows an asterisk next to the Billing and Coding Program (B398). The asterisk indicates that the student chose the program of study at entry or initiated a Program Degree Change Form. The Billing and Coding Program is a limited access program that requires the completion of specific prerequisite courses.

There are a total of 2 additional programs that were added to this student's record by the automated POS system (1108 – effective term 20101) or an advisor (2277 – effective term 20113). Neither of these programs have an asterisk next to the Program ID. The lack of an asterisk indicates that the changes were not initiated by the student.

On 2/28/2012, the student completed a Bachelor's Degree Application for Student Membership (effective fall 2012 semester). The elected program of study was a B.S. in Early Childhood Education (T100). This program appears on the ORION Select Student Program Objective screen. There is an asterisk next to the Program ID, indicating that the student submitted a Program Degree Change Form.

Title IV aid was paid to the student for the 2009-2010, 2010-2011 and 2011-2012 award years. None of the coursework taken during the award years was required for the Billing and Coding Program (B398).

Student 5 – The ARTEMIS College Application Objective field indicates the Certificate in Business Administration Program (6251) as the entry program. The ORION Select Student Program Objective screen shows an asterisk next to the Business Management Technical Certificate Program (6251). The asterisk indicates that the student chose the program of study at entry or initiated a Program Degree Change Form. The ORION Objective History Screen indicates a 999 code as the transfer major code (concurrent A.S.) for the Associates in Arts Program. This code is used for operations performed by the automated POS system. The effective term for both programs is 200902.

The advisor comments screen from ARTEMIS shows a comment on July 6, 2011 made by Walter Jones that states the following:

“Ms. Lowe’s office visit was for the purpose of initiating a financial aid appeal for a low completion rate (66%) for the (1108) A.A. Degree program of study. Student has 10 credits remaining in her program of study to complete it and is missing 2 prerequisite courses (ACG 2071 & ECO2023) for the Business major.”

This comment clearly indicates that the student planned to enter the BS in Business Administration Program (T200). The FSCJ website lists the ACG 2071 and ECO2023 as prerequisites for the B.S. in Business Administration Program. The student registered for the required prerequisites during the spring 2011 semester (20112). These prerequisites for the B.S. in Business Administration program do not qualify for financial aid for a student matriculated in the Certificate in Business Administration Program (6251).

In addition, the advisor added the A.S. in Business Administration Program (2213) for the 20122 term (no asterisk). This system change facilitated financial aid for the 20122 term as the registered courses were part of the A.S. in Business Administration Program requirements (prerequisites for the B.S. in Business Administration Program). Upon completion of the 20112 term, the student initiated a Program Objective Change Form to enter the B.S. in Business Administration Program - asterisk on the Select Student Program Objective screen. As a result, the student was eligible for Title IV aid during the summer 2012 term (20123).

In conclusion, the automatic POS system was utilized to facilitate financial aid eligibility by adding the Associate of Arts Program (1108) effective for the 20092 semester. There is no evidence that the student intended to pursue the Associate of Arts Degree.

An academic advisor entered the A.S. in Business Management Program (2213) effective for the 20122 semester to facilitate aid eligibility for the 20122 semester. There is no

evidence that the student intended to pursue the A.S. in Business Administration Program.

Effective the summer 2012 term (20123), the student submitted a Program Degree Change Form to enter the B.S. in Business Administration Program (signed 12/14/2011). An asterisk appears next to the B.S. in Business Administration Program ID on the ORION Select Student Program Objective screen.

The only coursework that was required for the Certificate in Business Administration Program (6251) was CGS1100, ECO2013 and MAN2021. All other coursework prior to the summer 2012 semester (20123) was not eligible for Title IV aid.

Student 9 – The Florida State College Application for Student Membership (dated 8/27/2010) did not list a major. The ARTEMIS Membership Application Report lists 2149 (A.S. Nursing – RN) as the major under the Educational Plans section. The A.S. in Nursing is a limited access program. The Orion Select Student Program Objective screen has an asterisk next to Program ID 2149. The asterisk indicates that the student chose this program at entry or initiated a Program Degree Change Form.

The Associate of Arts Program (1108) was automatically populated by the POS system and placed first in the listing of programs on the Browse Student Objective History screen. This placement facilitates Title IV eligibility for coursework that is not included in the A.S. Nursing - RN Program (student's program of intent). The U.S. History to 1865 (AMH2010) course is neither required or an eligible elective in the A.S. Nursing (2149) Program. This course was not eligible for Title IV aid.

Student 19 – The Student Select Program Objective screen shows an asterisk next to the Personal Enrichment (8403 - 200802), Supervision and Management (S100 – 20123), and Computer Integrated Manufacturing (2165 - 20063) Programs. The asterisks indicate that the programs were selected by the student.

The Browse Student Objective History screen shows the Associate in Arts Program (1108) listed first. This placement facilitates Title IV eligibility for coursework outside of the student's program of intent but within the coursework required for the Associate of Arts Program.

The Maintain Student Program Objective screen shows an effective term of 20112 for the Pharmacy Technician Program (B300). The student began his coursework in B300 in the spring 2010 semester (20102). The transcript shows a switch of major for one semester – 20111 – Associate in Arts – 1108. The student immediately returns to B300 the following semester (20112) to complete the certificate. There is no evidence that the student intended to enter the Associate of Arts Program in fall of 2010. The student was not eligible for Title IV aid during the fall 2010 semester.

Student 22 – The Florida State College at Jacksonville Readmission Application indicates that the student was pursuing an A.S. Degree in Digital Media/Multimedia Technology (2152) beginning with the fall 2010 semester (20111). The ORION Select Student Program Objective form lists Program ID 2152 with an asterisk and an effective term of 20111 (Fall 2010). The Browse Student Objective History form lists the Associate in Arts Program (1108) at the top of the program list with an effective term of 20111 (Fall 2010). This change was made by the automated POS system to facilitate financial aid eligibility for coursework not included in the Digital Media/Multimedia Technology Program (2152).

MGF1106 is not part of the required curriculum for the A.S. Degree in Digital Media/Multimedia Technology (2152). The mathematics general education requirement was satisfied during the summer 2007 semester by earning a B in Intermediate Algebra (MAT1033). This course was not eligible for Title IV aid.

Student 24 – The ARTEMIS College Application Objective field indicates the A.S. in Nursing Program (2149) as the entry program. The ORION Select Student Program Objective screen shows an asterisk next to the Nursing R.N. Program (2149). The asterisk indicates that the student chose the program of study at entry or initiated a Program Degree Change Form. The ORION Browse Student Objective History Screen indicates a 999 code as the transfer code for the Associates in Arts Program. This code is part of the automated POS system. The effective term for both programs is 20111. The Associate of Arts Program was automatically entered as the primary program by the POS system. By doing so, coursework taken outside of the A.S. in Nursing Program (prerequisites and electives) would qualify for student financial aid. The A.S. in Nursing Program is a limited access program.

An off-site interview with the student verified that the student never intended to enter the Associate in Arts Program. The student's academic advisor recommended taking the Intermediate Algebra (MAT1033) and Principles of General Chemistry (CHM1032C) courses as prerequisites to the College Algebra (MAC1105) and the Microbiology (MCB2010C) required Nursing 2149 courses. In addition, the Strategies/Success (SLS1103) and Elementary Algebra (MAT0028) courses were added as first level remedial courses. All of these prerequisites are not eligible for Title IV aid for the Associates in Nursing Program (2149).

Student 27 - The ARTEMIS College Application Objective field indicates the A.S. in Digital Media/Multimedia Technology Program (2152) as the entry program. The ORION Select Student Program Objective screen shows an asterisk next to the Digital Media/Multimedia Technology and Early Childhood Education Programs (2152 and T100). The asterisks indicate that the student chose these programs of study at entry or initiated a Program Degree Change Form. The Early Childhood Education Program

showed an admit status of N (No). The student had not yet been admitted to the Early Childhood Education Program at the time of review.

The ORION Browse Student Objective History Screen indicates a 999 code as the transfer code for the Associates in Arts Program. This code is part of the automated POS system. The effective term for the Digital Media/Multimedia Technology Program was 20113. The effective term for the Associate in Arts program was 20121. The student did not begin his studies until the Fall 2011 semester (20121). The Associate of Arts Program was automatically entered as the primary program by the POS system. By doing so, coursework taken outside of the Digital Media/Multimedia Technology Program (SLS1103) would qualify for student financial aid.

All of the coursework taken in the fall 2011 semester does not qualify for Title IV aid.

Required Action: Based upon the error rate of this finding, FSCJ must conduct a 100% file review of all Title IV recipients who had a primary program of study (admit status is yes and program is listed at the top of the ORION Student Program Objective screen) populated by the auto POS system that did not reflect the student's program of intent. FSCJ must report all coursework for affected students that was not required for the student's program of intent (Program ID on Program Objective screen has an asterisk). Additionally, FSCJ must report all Title IV aid that was awarded for coursework outside of the student's program of intent. These reporting requirements must be included as part of FSCJ's response to this Program review Report. The results of this review must be provided in Excel or a similar spreadsheet format (separated by award year) and contain the following fields:

1. Student's Name
2. Student's SSN
3. Program of Intent
4. Automatic POS System Program Entry or Manual Advisor Program Entry (No Student Intent)
5. Terms of Enrollment
6. Ineligible Coursework By Term
7. Ineligible Title IV Aid by Term

In lieu of performing a file review for the entire population of Title IV recipients who had a program of study populated by the auto POS system or advisor that did not reflect the student's program of intent, FSCJ has the option of performing this file review for only the remainder of the statistical sample not identified by the Department in the Program Review Report (includes remainder of sample). The results from this file review using the statistical sample will be used to project liabilities for the entire population (i.e., the average liability for the recipients in the statistical sample will be multiplied by the entire

population). This option is intended to reduce the burden on the institution of conducting a full file review.

If FSCJ wishes to select this option, the Department will forward statistical sample listings for award years 2011 and 2012. File reviews must be performed for all students on each statistical sample listing except those included in Finding 1 of this Program Review Report for the respective award years. In addition, FSCJ must review the students from the original sample that were not included in this Program Review Report.

If FSCJ elects to do the full file review, it is recommended that FSCJ first review the remainder of students in the statistical sample. At that point, FSCJ may decide to accept a liability projection instead of continuing with a full file review.

Please send the file review summary reports (spreadsheets) to Jon Finkelstein by e-mail at jon.finkelstein@ed.gov. See the enclosure – protection of Personally Identifiable Information (PII) for instructions regarding electronic submissions to the Department for data containing PII. Please present a separate e-mail with an access password to Jon Finkelstein.

Instructions for repayment of any liabilities will be provided in the Final Program Review Determination Letter.

Finding 2: Ineligible Students – Not Making Satisfactory Academic Progress (SAP)

Citation: 34 C.F.R. § 668.32(f)(4) states that a student is eligible to receive Title IV, HEA program assistance if the student maintains satisfactory progress (SAP) in his or her course of study according to the institution's published standards of satisfactory progress as long as those standards satisfy the provisions of 34 C.F.R. § 668.16 (e).

FSCJ's Satisfactory Academic Progress Policy states the following:

Students are only allowed to attempt a limited number of credit hours under federal financial aid guidelines. Credits may include college or workforce credits, transfer credits, and all other credits attempted at Florida State College at Jacksonville. All students receiving Title IV financial aid funds must meet Satisfactory Academic Progress (SAP). Academic history is reviewed for all students applying for financial aid, regardless of whether financial aid has been previously received.

5.1.1 Satisfactory Academic Progress Policy

1. Students pursuing an associate degree are not eligible for aid if they exceed 180 credit hours attempted. All transfer credits and credits attempted from a previous

- major will be included in the SAP calculation. This SAP status cannot be appealed.
2. Students pursuing a bachelor's degree are not eligible for aid if they exceed 240 credit hours attempted. All transfer credits and credits attempted from a previous major or associate degree will be included in the SAP calculation. This SAP status cannot be appealed.
 3. All academic history, with the exception of 30 hours of remedial coursework and English as a Second Language courses, is included when reviewing a student's SAP status whether or not Title IV funds were received during the period of enrollment. Academic history includes transfer and vocational coursework.
 4. Each student's progress will be evaluated each term.
 5. Students may be eligible for a financial aid warning period of one term. During this term students will maintain financial aid eligibility even though they are not currently meeting SAP standards. Students on financial aid warning will not be awarded aid for subsequent terms until academic progress is in compliance or an approved appeal is processed.
 6. The College will monitor quantitative and qualitative criteria to determine satisfactory academic progress. Students are deemed "meeting SAP standards" if they are in compliance with criteria listed below:
 - To meet quantitative SAP standards students must successfully complete 67 percent of all courses attempted and must not attempt more than 150 percent of the coursework required to complete their degree or certificate program.
 - To meet qualitative SAP standards students must maintain a cumulative grade point average (GPA) of 2.0 or better. For financial aid purposes, the cumulative GPA may include repeated courses, transfer hours and grades that were removed through the college's academic forgiveness policy.

Noncompliance: Student 19's academic transcript included hours earned from the United States Navy (43 credit hours). At the conclusion of the fall 2007 semester, the student had attempted a total of 95 credit hours (US Navy and FSCJ). At the conclusion of the fall 2007 semester, there was no evidence of a student appeal available (violation of 150% rule).

On 7/11/2011 the student submitted a SAP appeal for violation of the 150% rule. This appeal was denied by the Enrollment Services Coordinator and the Dean of Student Services. The student enrolled for the fall 2011 semester and Title IV aid was disbursed.

Required Action: FSCJ must review its SAP policy/procedures to determine the cause of the error. FSCJ must revise the SAP policy/procedures to ensure that any future occurrences of this error are prevented.

FSCJ will be liable for any Title IV, HEA funds disbursed to students who were not meeting the standards of SAP and did not submit a SAP appeal that was approved. Payment instructions for any liability associated with this finding will be provided in the Department's Final Program Review Determination letter.

Finding 3: Verification Violations

Citation: 34 C.F.R. § 668.16 (f)(2) states that to begin to participate in any Title IV, HEA program, an institution shall demonstrate to the Secretary that the institution is capable of adequately administering the program under each of the standards established in this section. The Secretary considers an institution to have administrative capability if the institution develops and applies an adequate system to identify and resolve discrepancies in the information that the institution receives from different sources with respect to a student's application for financial aid under Title IV, HEA programs. In determining whether the institution's system is adequate, the Secretary considers whether the institution obtains and reviews any documents, including any copies of State and Federal income tax returns that are normally collected by the institution to verify information received from the student or other sources.

Noncompliance: During the course of the review, three students were identified with verification violations. The specific issues are outlined below.

Student 2: The student was selected for verification by CPS. The student's 2010-2011 Verification Worksheet listed \$1,920.00 in child support received under the student section. The 2010-2011 ISIR reported that the student did not have children. The Verification Worksheet should have been adjusted to reflect the accurate recipient of child support payments.

Student 4: The student was selected for verification by the Central Processing System (CPS). The ISIR stated that the mother's 2009 income earned from work was \$21,230.00. The mother's 2009 Federal 1040 tax return listed \$21,078.00 in business income (Line 12) and \$152.00 in interest income (Line 8A). The 2010-2011 ISIR erroneously included \$152.00 in taxable interest in the income earned from work total.

Student 27: The student was selected for verification by CPS. The student's 2011-2012 Verification Worksheet listed \$7,368.00 in child support received under the student section. The 2011-2012 ISIR listed \$7,368.00 in child support received under the parent section. The Verification Worksheet should have been adjusted to capture the accurate recipient of child support payments.

Required Action: The institution must adjust its verification policy/procedures to prevent the reoccurrence of similar violations. Discrepant data must be identified and corrected in the verification process. Continued violations may result in incorrect student aid determinations that could prove harmful to the student and/or the Department.

In its response to this Program Review Report, FSCJ must submit a copy of its revised verification policies and procedures document.

Finding 4: Satisfactory Academic Progress Policy (SAP) Not Adequate/Incomplete

Citation: 34 C.F.R. § 668.34 (b)(1) states the maximum time frame for an undergraduate program measured in credit hours is defined as a period that is no longer than 150 percent of the published length of the educational program.

34 C.F.R § 668.34 (a)(8)(ii) states an institution must establish a reasonable satisfactory academic progress policy for determining whether an otherwise eligible student is making satisfactory academic progress in his or her educational program and may receive assistance under the title IV, HEA programs. The Secretary considers the institution's policy to be reasonable if—

A student on financial aid probation may receive title IV, HEA program funds for one payment period. While a student is on financial aid probation, the institution may require the student 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 satisfactory academic progress standards or meet the requirements of the academic plan **developed by the institution and the student** to qualify for further Title IV, HEA program funds.

Noncompliance: FSCJ's SAP policy is deficient in each of the areas detailed in the citation section of this finding. More specifically, FSCJ's SAP policy states the following:

- 1) "Students pursuing an associate degree are not eligible for aid if they exceed 180 credit hours attempted. All transfer credits and credits attempted from a previous major will be included in the SAP calculation. The SAP status cannot be appealed."

"Students pursuing a bachelor's degree are not eligible for aid if they exceed 240 credit hours attempted. All transfer credits and credits attempted from a previous major or associate's degree will be included in the SAP calculation. The SAP status cannot be appealed."

Most of the associate's and bachelor's degree programs at FSCJ are comprised of 60 and 120 hours respectively. The application of the 150% Rule results in a limit of 90 attempted credit hours for an associate's program and 180 attempted credit hours for a bachelor's program.

FSCJ staff indicated that the 180 and 240 hour limits are not used in the institution's SAP determinations. Staff further explained that, "the reason the numbers (180 and 240) are in the SAP policy is to remind staff that if a student has already exceeded maximum timeframe, attempted more than 180 hours, and is in an associates program; the APPEAL should not be approved."

The current policy reads that students pursuing an associate degree are not eligible for aid if they exceed 180 credit hours attempted (200% of the required hours for the program of study). The current policy reads that students pursuing a bachelor's degree are not eligible for aid if they exceed 240 credit hours attempted (200% of the required hours for the program of study). Per federal regulations, students are not eligible for aid when they exceed 150% of the hours required for a particular program of study.

- 2) Students who receive an approved appeal, but are not meeting SAP standards after one term, are no longer eligible for financial aid and will have all awards cancelled for the next term. Students may submit an academic plan to have their financial aid eligibility reinstated.

The Federal Student Aid Handbook, Volume 1, pp. 12 states, all schools can have financial aid probation in their satisfactory progress policy. When a student loses FSA eligibility because he failed to make satisfactory progress, he may appeal that result on the basis of: his injury or illness, the death of a relative, or other special circumstances. His appeal must explain why he failed to make satisfactory progress and what has changed in his situation that will allow him to make satisfactory progress at the next evaluation. You can grant his appeal and put him on probation if you determine that he should be able to meet the standards after the subsequent payment period or if you develop an academic plan that, when followed, will ensure that he will meet the standards by a specific time. 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, **you develop an academic plan for them**, and they are meeting its requirements.

The current policy places the responsibility for developing the academic plan on the student. The policy should be revised to indicate that FSCJ will develop the academic plan to suit each student's individual circumstances.

FSCJ's SAP policy states the following:

"To meet qualitative SAP standards, students must maintain a cumulative GPA of 2.0 or better. For financial aid purposes, the cumulative GPA **may** include repeated courses, transfer hours and grades that were removed through the college's academic forgiveness policy."

The use of the word “may” allows FSCJ to use arbitrary determinations in calculating SAP. The SAP policy must be applied consistently to all students receiving Title IV aid. The SAP policy must be revised to exclude the stipulation or change the word “may” to “will”.

Required Action: FSCJ must revise its SAP policy to meet each of the regulations listed in the citation for this finding. In response to this Program Review Report, FSCJ must submit a written update of its SAP policy to the Department.

Finding 5: Return to Title IV Policy (R2T4) Not Developed/Inadequate

Citation: 34 C.F.R. § 668.43 (a) states institutional information that must make readily available to enrolled and prospective students under this subpart includes, but is not limited to—

- (3) The requirements and procedures for officially withdrawing from the institution;
- (4) A summary of the requirements under §668.22 for the return of title IV grant or loan assistance;

The 2011-2012 Student Financial Aid Handbook, Volume 5, pp. 34 states in the consumer information a school must make available upon request to prospective and enrolled students, the school must include a statement of –

- any refund policy with which the school must comply;
- the requirements for the treatment of Title IV funds when a student withdraws
- the requirements and procedures for officially withdrawing from the school

A school should provide sufficient information for a student or prospective student to be able to determine the procedures for withdrawing and the financial consequences of doing so. In addition, a student should be able to estimate how much Federal Student Aid he or she will retain, and how much he or she may have to return upon withdrawing. The information should include a discussion of how a school might adjust a student’s charges to take into account any return of FSA funds the school might be required to make. Finally, a student or prospective student should be informed that if he or she withdraws, school charges that were previously paid by FSA funds might become a debit that the student will be responsible for paying.

As a part of the institution’s disclosure of the procedures for officially withdrawing, the school must identify the office or offices that it has designated to accept notification of official withdrawals.

A school must have a written procedure/policy that describes the process to determine if a student who failed to earn a passing grade in any class earned the failing grades or unofficially withdrew.

Noncompliance: FSCJ publishes a Repayment of Title IV Funds policy on its website. Additionally, the institutional refund policy appears in the 2011-2012 FSCJ Catalog. Several of the required consumer information and R2T4 procedures are missing from FSCJ's R2T4 policy and procedures. These missing components include:

- The procedures a student must follow to officially withdraw.
- An example of an estimate of the amount of aid that a student may earn and an estimate of the amount the student may have to return.
- A procedure for determining whether a student that receives all failing grades earned the grades or unofficially withdrew.

Required Action: FSCJ must revise its R2T4/Withdrawal policy. The policies must adequately address each of the requirements outlined in this finding. In its response to this Program Review Report, FSCJ must submit written R2T4/Withdrawal policy to the Department.

Finding 6: Verification Policy Not Documented/Missing

Citation: 34 C.F.R. § 668.53 (a) states that an institution must establish and use written policies and procedures for verifying an applicant's FAFSA information in accordance with the provisions of this subpart. These policies and procedures must include—

- (1) The time period within which an applicant must provide any documentation requested by the institution in accordance with §668.57;
- (2) The consequences of an applicant's failure to provide the requested documentation within the specified time period;
- (3) The method by which the institution notifies an applicant of the results of its verification if, as a result of verification, the applicant's EFC changes and results in a change in the amount of the applicant's assistance under the title IV, HEA programs;
- (4) The procedures the institution will follow itself or the procedures the institution will require an applicant to follow to correct FAFSA information determined to be in error; and
- (5) The procedures for making referrals under §668.16(g).

(b) An institution's procedures must provide that it will furnish, in a timely manner, to each applicant whose FAFSA information is selected for verification a clear explanation of—

(1) The documentation needed to satisfy the verification requirements; and

(2) The applicant's responsibilities with respect to the verification of FAFSA information, including the deadlines for completing any actions required under this subpart and the consequences of failing to complete any required action.

(c) An institution's procedures must provide that an applicant whose FAFSA information is selected for verification is required to complete verification before the institution exercises any authority under section 479A(a) of the HEA to make changes to the applicant's cost of attendance or to the values of the data items required to calculate the EFC.

Noncompliance: FSCJ's Verification Policy is limited to the following:

"The Department of Education selects 30 percent of student files for verification. In addition, Florida State College will verify SARS with conflicting information. When a file is selected for verification, a student and/or parent must complete a verification worksheet and submit copies of their tax return and other required documents. You must submit all documents in order to complete your file and continue processing of your application. The College is required to review accuracy of all household/income information."

The current Verification Policy and Verification Procedures documents are lacking each of the components described in the citation section of this finding.

Required Action: The institution must draft a verification policy/procedures document that satisfies each of the requirements listed in 34 C.F.R. § 668.53. In response to this Program Review Report, FSCJ must submit a written verification policy/procedures document to the Department.

Finding 7: Drug Abuse Prevention Program Requirements Not Met

Citation: 34 C.F.R. § 68.100 states the institution's drug prevention program must, at a minimum, include the following:

(a) (3) A description of the health risks associated with the use of illicit drugs and the abuse of alcohol;

(b) A biennial review by the institution of its program to—

(1) Determine its effectiveness and implement changes to the program if they are needed.

(2) Ensure that the disciplinary sanctions described in paragraph (a)(5) of this section are consistently enforced

Noncompliance: The institution's program is outlined in its 2011-2012 FSCJ Catalog. A review of FSCJ's Drug Abuse Prevention Program indicated an absence of the before mentioned components. Corrective actions must include the following:

- A detailed listing of the possible health consequences associated with the use of illicit drugs and alcohol.
- Completion of a bi-annual review to determine the Drug and Alcohol Prevention Program's effectiveness, including the need to implement necessary changes. The review should also ensure that the disciplinary sanctions described in the current policy are consistently enforced. Finally, the bi-annual review must be administered by a responsible party and signed by the President.

Required Action: FSCJ must update its Drug and Alcohol Prevention Program to include the missing components.

FSCJ must conduct a biennial review to measure the effectiveness of its drug and alcohol abuse education and prevention programs. FSCJ must describe the research methods and data analysis tools that will be used to determine the effectiveness of the program as well as the responsible official or office that will conduct the review. The Biennial Review report must include a status report on the implementation of the recommendations made in its prior Biennial Review reports. The initial biennial review and report must be completed by December 31, 2012 and must be submitted to the Department by January 5, 2013.

Based on an evaluation of all available information including FSCJ's response to this Program Review Report, the Department will determine if additional action will be required and will advise FSCJ accordingly in its Final Program Review Determination Letter.

Finding 8: Inaccurate Recordkeeping

Citation: 34 C.F.R. § 690.83 (2) states that the Secretary accepts a student's payment data that is submitted in accordance with procedures established through publication in the federal register. The payment data contains information the Secretary considers to be accurate in light of other available information including that previously provided by the student and institution.

A disbursement date is defined as the date the institution:

- Credits funds to the student's account, or;
- Pays funds directly to the student

34 C.F.R. § 685.300 (a)(1)(5) states that participation in the Direct Loan Program means that eligible students at the school may receive Direct Loans. To participate in the Direct Loan Program, a school shall –

- provide timely and accurate information to the Secretary for the servicing and collection of loans

Noncompliance: Disbursement dates reported to the Common Origination and Disbursement System (COD) did not always match dates that funds were credited to student ledgers. This issue becomes especially critical for loan recipients, as the disbursement date reported to COD is vital in the lender's determination of an accurate repayment start date.

During the course of the review, the following students were identified as having conflicting COD and account ledger disbursement dates.

Student Number	Title IV Program	Disbursement Amount	Student Ledger Disbursement Date	COD Disbursement Date	Difference – Days Early/Late
7	Direct Loan Subsidized	\$2,239.00	2/5/2011	2/15/2011	10 Days Late
8	Direct Loan Subsidized	\$1,742.00	2/5/2011	2/15/2011	10 Days Late
10	Direct Loan Subsidized	\$1,742.00 \$1,742.00	10/5/2010 2/4/2011	10/18/2010 2/15/2011	13 Days Late 11 Days Late
10	Direct Loan Unsubsidized	\$2,985.00 \$2,985.00	10/5/2010 2/4/2011	10/18/2010 2/15/2011	13 Days Late 11 Days Late
18	Pell Grant	\$ 277.00	2/23/2012	2/3/2012	20 Days Early

Required Action: The institution must review its COD reporting procedures to determine the cause of the discrepancies. Procedures must be updated to ensure that disbursement dates reported to COD are the same as the date that funds are credited to student accounts. In response to this Program Review Report, FSCJ must include a written update of its COD reporting procedures.

Finding 9: Student Underawarded Academic Competitiveness Grant (ACG)

Citation: 34 C.F.R. § 692.62 (a)(b)(1)(i) states for each award year, the Secretary establishes and announces the ACG and National SMART Grant Scheduled Awards depending on the availability of funds for all students who are eligible for a grant under § 691.15.

The Secretary may revise the ACG and National SMART Grant Scheduled Awards in an award year depending on the availability of funds for all students who are eligible for a grant under § 691.15.

The maximum ACG Scheduled Award for an eligible student may be up to—

\$750 for the first year of the student's eligible program; and

\$1,300 for the second year of the student's eligible program

34 C.F.R. § 691.63 (a)(1)(i)(A)(B)(C) states for programs using standard terms with at least 30 weeks of instructional time, a student's grant for a payment period is calculated under paragraphs (b) or (d) of this section if—

(i) The student is enrolled in an eligible program that—

(A) Measures progress in credit hours;

(B) Is offered in semesters, trimesters, or quarters; and

(C) Requires the student to enroll for at least 12 credit hours in each term in the award year to qualify as a full-time student.

Noncompliance: Student 4 was awarded \$736.00 in ACG for the 2010-2011 award year. As a first year student, the full eligibility is \$750.00. FSCJ underawarded the student by \$14.00.

The incorrect eligibility calculation is demonstrated by the following:

Cost of Attendance	\$9,722.00
Estimated Family Contribution (EFC)	20
Financial Need	\$9,702.00

Aid Awarded

Federal Pell Grant	\$5,500.00
Subsidized Stafford Loan	\$2,486.00
Unsubsidized Stafford Loan	\$1,000.00
Academic Competitiveness Grant	\$ 736.00
Total Financial Aid	\$9,722.00

The student requested fall only loan eligibility (\$1,750 Subsidized and \$1,000 Unsubsidized). She subsequently requested her full Spring Loan eligibility (\$1,472.00). ACG eligibility was not determined until the spring 2011 semester. The staff member cancelled the second disbursement of the spring subsidized loan (\$736.00) and replaced it with an ACG award (posted to COD on 3/2/2011).

The eligibility calculation upon awarding the ACG grant should have been as follows:

Aid Awarded

Federal Pell Grant	\$5,500.00
Subsidized Stafford Loan	\$2,486.00
Unsubsidized Stafford Loan	\$ 986.00
Academic Competitiveness Grant	\$ 750.00
Total Financial Aid	\$9,722.00

The Unsubsidized loan should have been reduced and returned by \$14.00 to accommodate full ACG eligibility (\$750.00).

Required Action: The institution must review and update its awarding procedures to ensure that eligibility calculations are accurate. In response to this Program Review Report, FSCJ must include a written update of its awarding procedures.

Finding 10: Pell Underpayment

Citation: 34 C.F.R. § 690.12 states as a first step to receiving a Federal Pell Grant, a student shall apply on an approved application form (Free Application Federal Student Aid – FAFSA) to the Secretary to have his or her expected family contribution (EFC) calculated.

34 C.F.R. § 690.61 (a)(i)(ii) states that except as provided in paragraph (a)(2) of this section, an institution must disburse a Federal Pell Grant to an eligible student who is

otherwise qualified to receive that disbursement and electronically send Federal Pell Grant disbursement data to the Secretary for that student if –

The student submits a valid Student Aid Report (SAR) to the institution; or,
The institution obtains a valid Institutional Student Information Report (ISIR) for the student.

34 C.F.R. § 690.62 (a) states that the amount of a student's Federal Pell Grant for the academic year is based upon the payment and disbursement schedules published by the Secretary for each academic year.

An institution is responsible for awarding and disbursing a student's full demonstrated Federal Pell Grant eligibility. Instances of under payment must be rectified by disbursing additional funds.

Noncompliance: FSCJ defines full time enrollment as twelve or more credit hours per semester. Student 28 was enrolled in 9 credit hours of coursework during the spring 2012 semester. As such, the student was eligible for a three quarter time Pell Grant disbursement. FSCJ disbursed a half time Pell Grant disbursement. The student was underawarded a total of \$695.00 (\$2,082.00 - \$1,387.00).

Required Action: FSCJ may submit a request to re-open the 2011-2012 award year to the Common Origination and Disbursement (COD) system and submit an origination of \$695.00 in Pell Grant funds for the spring 2012 semester (student 28). Upon receipt, these funds must be credited to the student's account. In response to this Program Review Report, FSCJ must provide documentation of the affected student's adjusted account ledger.

FSCJ must review its Pell Grant COD origination procedures to determine the cause of the error. Procedures must be updated to ensure that accurate enrollment statuses are reported to COD when submitting Pell Grant origination records. In response to this Program Review Report, FSCJ must include a written update of its Pell Grant origination policies/procedures.

D. Recommendations

The following are recommendations based upon observations made by the review team during the program review. FSCJ is not required to provide a response to, nor is FSCJ required to act upon, these recommendations. However, the review team believes that adoption of this/these recommendations will assist the institution in its administration of Title IV, HEA program funds.

1: FSCJ provided the reviewers a copy of the current Verification Policy. On page 11 of the document, the issue of tolerance is discussed. The policy states,

“The tolerance limit is \$400 – if the net difference between the original and correct data for certain dollar items is more than \$400, the information must be corrected.”

Beginning with the 2012-2013 award year changes were made to the verification procedures. 34 C.F.R. § 668.59 (a)(1)(2) states, for the subsidized student financial assistance programs, if an applicant's FAFSA information changes as a result of verification, the applicant or the institution must submit to the Secretary any changes to—

- (1) A non-dollar item; or,
- (2) A single dollar item of \$25 or more.

FSCJ should revise its Verification Policy document to reflect the changes to the tolerance rule.

2: FSCJ has a brief verification statement in the information available on its website - <http://www.fscj.edu/mydegree/financial-aid/financial-aid/index.php#verification>

The verification section states the following:

“The Department of Education selects 30 percent of student files for verification. In addition, Florida State College will verify SARS with conflicting information. When a file is selected for verification, a student and/or parent must complete a verification worksheet and submit copies of their tax return and other required documents. You must submit all documents in order to complete your file and continue processing of your application. The College is required to review accuracy of all household/income information.”

FSCJ should update this information to include the Internal Revenue Service retrieval process and tax transcript requirement.

3: The Student Aid Authorization Form states that with authorization, FSCJ will deduct from financial aid charges for a balance owed for a prior semester (if funds are available). This should be expanded to include a differentiation between prior semester and prior year. In addition, the form should clearly state that there is a \$200.00 limit for prior year charges that can be covered by current financial aid.

4: Several of the Federal Work Study job descriptions that were submitted to the reviewers included information regarding wages (\$6.00 per hour). Federal regulations require institutions to establish an hourly wage that meets or exceeds the federal minimum wage. FSCJ should update each of the job description documents to reflect a wage at or above the current federal minimum wage.

E. Appendices

Appendix A (Student Sample), B and C (Statistical Samples) contain personally identifiable information and will be emailed to FSCJ as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file(s) will be sent in a separate email.

Appendix C
Program Review Response

Appendix C

January 8, 2013

Mr. Jon Finkelstein
Federal Student Aid
Atlanta School Participation Division
U.S. Department of Education
61 Forsyth St. SW, Room 18T40
Atlanta, GA 30303-8918

Via Email to jon.finkelstein@ed.gov
(Original w/all attachments sent via Federal Express)

RE: Program Review Report
Florida State College at Jacksonville
OPE ID: 00148400
PRCN: 201240428075

Dear Mr. Finkelstein:

Attached please find Florida State College at Jacksonville's response to the Program Review Report issued on November 7, 2012 by the United States Department of Education, Federal Student Aid, School Participation Team - Atlanta. For all of the reasons presented herein, Florida State College at Jacksonville does not concur with Finding 1, 2 and 10 set forth in the Program Review Report and seeks that these findings be reconsidered.

We appreciate the opportunity to comment on the Program Review Report and reserve the right and opportunity to respond further to any final report as may be issued. Should you need any further information or clarification, please contact Jeanne Miller (Jeanne.M.Miller@fscj.edu or 904-632-3241).

Respectfully submitted

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

Dr. Judith Bilsky
Provost and Acting College President

Enclosures

cc: Mr. Steven Bowers
Dr. Tracy Pierce
Jeanne M. Miller, Esquire
Michael Brustein, Esquire

January 8, 2013

Mr. Jon Finkelstein
Federal Student Aid
Atlanta Participation Division
U.S. Department of Education
61 Forsyth St. SW Room 18T40
Atlanta, GA 30303-8918

RE: Program Review Report
Florida State College at Jacksonville
OPE ID: 00148400
PRCN: 201240428075

Dear Mr. Finkelstein:

The purpose of this letter is to respond to the preliminary program review report dated November 7, 2012. As required, the College's response will address each finding, as enumerated in the preliminary program review report, and include our position on the finding, and where applicable, the corrective action that has or will be taken.

Finding 1: Title IV Aid Disbursed for Coursework Not Required for Degree/Certificate

From July 30, 2012 through August 3, 2012, the United States Department of Education (ED or the Department) conducted a program review at Florida State College at Jacksonville (FSCJ or the college) to determine FSCJ's compliance with federal statutes and regulations as they pertain to the college's administration of Title IV, Higher Education Act (HEA) programs. A sample of 30 files from the 2010-2011 and 2011-2012 (year to date) award years was identified for review. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year.

The Program Review Report, PRCN 201240428075 (Report), issued November 7, 2012, includes ten initial findings. As detailed below, FSCJ disagrees with the reviewers' conclusions under Finding 1.

The College disagrees with this Finding for two reasons. First, even if the Department can sustain a finding that is unsupported by law or regulation, this finding involves only one out of 30 students, an error rate of just 3.3%. Such a low error rate does not indicate a systemic issue and should not trigger a file review of all participants. Secondly, the college disagrees with the Department's interpretation that courses that do not count towards a student's degree may not be used to determine enrollment status. This interpretation is not supported by law or regulation and therefore cannot support a disallowance.

1. Only One File Was Out of Compliance.

Finding 1 indicates that FSCJ violated Title IV by disbursing aid to students for coursework not required for a degree/certificate. The Report incorrectly found that disbursements made for students 1, 3, 5, 9, 19, 22 and 27 were made based on enrollment status calculations that included classes that did not count towards the students' intended program of study (POS). In fact, as demonstrated below, the classes used in the enrollment status calculation for the above identified students did count towards the students' intended POS.

The college has five different types of applications – one for each similar award level. A student is required to fill out an application each time the student intends to pursue a degree that requires an application not already on file. An asterisk next to the POS on the Student Information System: Select Student Program Objective screen indicates only that the POS was specified on a student's application. See ORION Legend, Attachment 1, page 2. Contrary to the reviewer's understanding, the lack of an asterisk does not automatically indicate that the student did not initiate a POS change, only that that POS was not indicated on the student's initial application.

Often, once accepted, a student will meet with an advisor who will discuss the student's academic goals. Based on conversations with students, an advisor will update the student's POS as necessary. Similarly, throughout a student's academic career, a student may meet with an advisor for various reasons. If a change in POS is made as a result of those meetings or discussions, no formal form is required, although occasionally a student will submit a Change Form following such meetings. A change in POS initiated by an advisor at the time of a meeting with a student, or based on a Change Form, will not have an asterisk next to it.

It is also important to note that there are some POS that are limited access. In other words, a student must be accepted into a limited access program prior to being able to take courses in that program. In those cases, a student must take lower level requirements that will make the student eligible for entry into that student's selected POS. The lower level requirements are the same for most if not all bachelor level POS.

The Report mistakenly found that eight out of the 30 sample files reviewed were out of compliance. As a result, ED asked FSCJ to complete a file review for all Title IV recipients who had a primary POS populated by the auto POS system that did not reflect the student's program of intent. In fact, as explained below, for seven out of the eight students affected, all questioned classes do count towards the student's intended POS even under the Department's flawed interpretation. Accordingly, the enrollment status calculations for seven of the eight students were compliant at the time of the review. The reviewers questioned these calculations based on their misunderstanding of the POS system – not an error by FSCJ.

Only one out of the 30 sample files reviewed was out of compliance – an error rate of just 3.3%. Consistent with long-standing Department policies and standard practices, FSCJ's one instance of noncompliance does not indicate a systemic issue and should not trigger a file review for all participants. See Attachment 2, Program Review Guide, page III – 17. ED's 2001 Program Review Guide specifically states:

As previously noted, reviewers can require that an institution perform reviews of its records (file reviews) to ascertain the extent of a deficiency that appears to be systemic and material. Generally, an error rate of greater than 10 percent for any given award year would signal a systemic problem. *Id.*

In addition, ED's standard practices are consistent with (1) the Financial Partners Eligibility & Oversight Guaranty Agency Review Guide, which also uses noncompliance of more than 10 percent of the sampled students as a trigger to conduct a file review, and (2) the regulatory requirement in 34 C.F.R. § 668.173(d)(3)(iv), which requires a letter of credit upon a finding that an institution has not returned unearned funds for more than 10% of the sampled students. Further, ED applied its standard practices in determining not to request a file review for Findings 2, 3, 8, 9 and 10. In the aforementioned findings, the rate of noncompliance never exceeded 10%, and thus ED did not find systemic issues and did not request comprehensive file reviews for these findings. The circumstances in Finding 1 are analogous to the circumstances in Findings 2, 3, 8, 9 and 10 – the one isolated instances of noncompliance does not indicate a systemic problem and thus does not trigger a full file review. Accordingly, ED should not require a file review in Finding 1.

Student 1:

This student indicated on her application that she wanted to pursue the Medical Coder/Biller POS. *See* Student File, Attachment 3, Item 1 (indicating the information that was including on student's application); *see also* Student Information Screen Objective Log, Attachment 3, Item 2 (showing POS at time of application).

As noted in the comment log, the student met with an advisor (Sharon Hoose) on August 31, 2010 for first term advising. *See* Attachment 3, Item 3. As a result of this meeting, the advisor added Nursing R.N. (code number 2149 – a limited access program) as the student's POS. There is no asterisk next to the nursing objective because this POS was not indicated on the student's application; however, the change does reflect the student's intent as it was the result of the first term advising session.

The student's intent to pursue Nursing R.N. as her program of study is further indicated by the courses the student registered for in the fall term. *See* Attachment 3, Item 4. All of the fall term (20111) classes are classes that are required for acceptance into the Nursing R.N. program.

The student went through the auto POS program on October 15, 2010. *See* Attachment 3, Item 5. Because the student was not accepted into the nursing program, the auto POS program changed the student's primary POS from Nursing R.N. to Associate in Arts (code 1108). However, as noted above, the courses the student was enrolled in were required for the Nursing R.N. program. Because the courses are required for most, if not all majors, they also met the requirements for the Associate in Arts POS – FSCJ's general degree program. Accordingly, all of the classes were financial aid eligible regardless of whether the student's POS was Nursing R.N. or Associate in Arts. *See* Degree Audit, Attachment 3, Item 7.

Similarly, all of the classes the student registered for during the spring term (20112) applied toward both the Nursing R.N. POS and the Associate in Arts POS. *See* Registration History, Attachment 3, Item 6 and Degree Audit, Attachment 3, Item 7.

Accordingly, all classes taken during fall 2010 and spring 2011 counted towards the student's intended POS – Nursing R.N. regardless of the fact that the auto POS program changed the student's primary POS in the ORION system. As such, all of these classes can be used in the enrollment status calculation and this student should not be in the list of affected students.

Student 3:

This student was a double major. *See* Comment Log, Attachment 4, Item 7 (indicating that the student was working on Associate in Arts Degree (1108) while awaiting admission into Health Information Management (HIM) (2277)). The ORION system does not allow for students to have more than one primary objective selected at a time. Accordingly, when students are double majors and taking courses that meet the requirements of one or both programs, only one program is indicated as the primary POS. As a result, the student may switch back and forth between POS during a term or terms.

This student initially applied to be admitted into the Medical Coder/Biller program (objective B398). *See* College Credit Application, Attachment 4, Item 1. However, the student met with an advisor (Amy Perkins) on August 13, 2009. As a result of the advising session, the advisor changed the student's primary POS to HIM. *See* Objective History Log, Attachment 4, Item 2a. Additionally, the student also submitted a Change Form requesting that his primary program objective be changed from Medical Coder/Biller (B398) to HIM (2277) on August 13, 2009. *See* Change Form, Attachment 4, Item 2b.

HIM is a limited access program. Accordingly, while the HIM program was the student ultimately wanted to pursue his degree, he could not take courses in this program until he was accepted. At the time of enrollment into the college, the student was not admitted into the HIM program. However, both courses taken during the fall 2009 term (20101) were courses required for admittance into HIM and therefore counted toward that POS. See Degree Audit, Attachment 4, Item 2c.

On October 27, 2009, the student went through the auto POS program which changed the student's primary POS to Associate in Arts (objective 1108), the college's general degree program, due to the fact that the student had not been accepted in to the HIM program. See Objective History Log, Attachment 4, Item 3.

The student met with an advisor (Amy Perkins) on October 27, 2009. Based on the meeting the advisor changed the student's primary POS back to HIM and helped enroll the student into class that met the requirement the Associate in Arts degree and/or the HIM degree. See Objective History Log, Attachment 4, Item, 4a; Registration History, Attachment 4, Item 4b.

Because the student was still not admitted into the HIM program, the student's primary POS was subsequently changed back to the Associate in Arts program through the auto POS system. However, the student's intent to pursue a HIM degree and an Associate in Arts degree remained consistent. For the summer 2010 term (20103) and fall 2011 term (20111) the student continued to takes classes that met requirements for the HIM degree and/or the Associate in Arts degree. See Registration History, Attachment 4, Item 5a; Objective History Log, Attachment 4, Item 5b; Registration History, Attachment 4, Item 6.

This is further confirmed by the comments in the Comment Log pursuant to a November 1, 2010 advising session. The comment states that the student is working on completing the Associate in Arts degree while at the same time awaiting admission into the HIM degree program. See Comment Log, Attachment 4, Item 7.

Ultimately the student achieved both goals. He was awarded an Associate in Arts degree in December 2011. See Permanent Academic Credit Record, Attachment 4, Item 10a; Degree Audit, Attachment 4, Item 10b. The student was also admitted to the HIM program on June 7, 2011. See Objective History Log, Attachment 4, Item 9.

The student then submitted a Change Form requesting that his program objective be changed from general studies (from which he had already graduated) to a Bachelor degree in Early Childhood Education (objective code T100). See Change Form, Attachment 4, Item 8. Because the student had to complete an application for the Bachelors degree, there is an asterisk next to the program code on the main Program Objective Screen.

All classes the student was enrolled in during the fall 2009, spring 2010, summer 2010, fall 2010, spring 2011, summer 2011 and fall 2011 terms counted toward the Associate in Arts degree and/or the HIM degree. Although the student's primary POS was switched between both degrees throughout this time due to advisor changes based on meetings with the student and the auto POS program, these changes were consistent with the student's intent to pursue both degree programs. As such, all of these classes can be used in the enrollment status calculation and this student should not be in the list of affected students.

Student 5:

This student indicated on her initial application that she wanted to pursue a Business Management degree (objective code 6251). See Student Information System College Credit Application, Attachment 5, Item 1. The application was submitted on September 16, 2008.

On September 29, 2008 the student spoke with an advisor (Frank Heinze). See Comment Log, Attachment 5, Item 2a. As a result of this meeting, the advisor changed the student's primary POS to Associate in Arts (objective 1108) with a transfer major in Business Administration (objective 202). See *id*; see also Objective Log History, Attachment 5, Item 2b.

The student met with an advisor on July 6, 2011 (Walter Jones). See Comment Log, Attachment 5, Item 3a. During this meeting the advisor indicated that the student needed courses ACG2071 and ECO2023 in order to be accepted into her transfer major (Business Administration, Objective Code 202). These two courses can be taken as electives meeting a requirement for the Associate in Arts degree, the student's primary objective. The student registered for these two courses. See Associate in Arts Degree Audit, Attachment 5, Item 3b at page 5.

The student's indented POS remained the same (primary objective Associate in Art - 1108, transfer major Business Administration - 202) until she graduated from the Associate in Arts program. See Objective History Log, Attachment 5, Item 4 at page 14.¹

Prior to graduation from the Associate in Arts program, the student submitted an application for a Bachelor Degree in Business Administration (T200) on December 15, 2011. The application was for admission into the summer 2012 term (20123). The student was not admitted into the program. See Objective History Log, Attachment 5, Item 4 at page 13; see also Application, Attachment 5, Item 5.

Since the student had graduated from the Associate in Arts program and had not been accepted into the Business Administration program, the student did not have an active program of study as of January 2012. The student met with a Welcome Center advisor (Arnold Carreiro) on January 5, 2012. The advisor wrote that the student requested a program change to Associate in Science Business Administration (objective code 2213). See Student Comments, Attachment 5, Item 6a. The student was advised to complete a Change Form, although she never did. However, based on the meeting, the advisor updated the student's primary POS to indicate student's intent. The courses the student took during the spring term (20122) were required for the student's new primary POS (Associate in Science Business Administration). See Degree Audit, Attachment 5, Item 6b at page 4.

The student was accepted into the Bachelor in Business Administration program (objective code T200) on April 12, 2012 for the summer 2012 term (20123). See Objective History Log, Attachment 5, Item 7.

While auto POS was run on this student, advisor Frank Heinze changed the student's primary POS to Associate in Arts in September 2008, prior to the student going through auto POS. Accordingly, the auto POS system had no effect on the student primary objective (1108) or transfer objective (200).

All courses taken by this student counted towards the student's intended POS at the time the courses were taken. As such, all of these classes can be used in the enrollment status calculation and this student should not be in the list of affected students.

¹ Pgm St stands for Program Status. AC means active. GR means graduated. Page 14 of the Objective History Log demonstrates that on January 3, 2012 the student had graduated with an Associate in Arts degree. When a student graduates from a POS, the ORION system does not default to a new primary POS. If the student wishes to pursue further coursework towards a different degree a student must reapply and select a new primary POS on the application.

Student 9

This student completed a web application for college credit on July 1, 2010 indicating Nursing RN as her primary POS. See College Credit Application, Attachment 6, Item 1. Subsequently, on August 27, 2010, the student completed a paper application. See Application for Student Membership, Attachment 6, Item 2. The paper application indicated a general degree (student checked the college degree circle and did not indicate a major). As noted above, FSCJ's general degree is the Associate in Arts (objective code 1108). See Online 2010-2011 Course Catalog, A.A. General Education Requirements, Major Prerequisites: http://floridastatecollegecatalog.fscj.edu/preview_program.php?catoid=18&poid=3860&returnto=2318#majorprerequisites

Although the application is stamped "ENTERED" indicating that the information had been entered into the ORION system, an error was made and the application information was never actually entered into the system. Accordingly, the student's intended POS was never added/updated on the system.

On February 25, 2011 the student was run through the auto POS program which updated the student's primary POS to the Associate in the Arts degree. See Objective History Log, Attachment 6, Item 3. However, this is the degree program that should have already been in the ORION system based on the most recent application. Accordingly, although auto POS did change the student's primary POS, the change was in fact in line with the student's most recently expressed intended POS.

All courses taken in the spring of 2011, including AMH2010, counted towards the Associate in Arts degree. See Degree Audit, Attachment 6, Item 4. As such, the AMH2010 class can be used in the enrollment status calculation and this student should not be in the list of affected students.

Student 19

This student received benefits through the Department of Veterans Affairs (VA). As a VA student, the student is required to indicate intended majors and changes in major to the VA. As noted above, the lack of an asterisk next to an objective code in the ORION system does not indicate that a change in POS was not initiated by the student. Rather it only indicates that the student requested that POS on an application.

This student submitted a Change Form through the Department of Veterans Affairs in August 2010 to be effective for the fall 2010 term (20111). On the form the student requested a change to the Associate in Arts POS. See Request for Change of Program or Place of Training, Attachment 7, Item 1a. The request was effectuated by an advisor (Susan Brown) and noted in the Comment Log for this student. See Comment Log, Item 1b; Objective History Log; Item 1c; Student Program Objective, Item 1d. Accordingly, despite that lack of an asterisk next to the Associate in Arts objective code (1108), because the student clearly initiated the POS change to Associate in Arts, the change demonstrates the student's intent.

All classes taken during the term in question (fall 2010 term 20111) were required for the Associate in Arts POS – the student's intended POS. See Degree Audit, Attachment 7, Item 2. As such, all of these classes can be used in the enrollment status calculation and this student should not be in the list of affected students.

Student 22

This student originally applied with an intended POS of Associate in Arts. See Application for Student Membership, Attachment 8, Item 1. This student reapplied for admission on May 4, 2010 and requested the POS

of Digital Media/Multimedia Technology (objective code 2152). See College Credit Application, Attachment 8, Item 2a; Readmission Application, Attachment 8, Item 2b; Objective History Log, Attachment 8, Item 2c; Comment Log, Attachment 8, Item 2d. Accordingly, starting with the fall 2010 term (20111), Digital Media/Multimedia Technology was the primary objective indicated in ORION.

The student went through the auto POS program in May 2011, which made the Associate in Arts degree the primary objective in ORION. See Objective History Log, Attachment 8, Item 5. During the summer 2011 term (20113) the student was enrolled in two courses: MGF1106 and PSY1012. See Unofficial Transcript, Attachment 8, Item 3. Both courses are required courses for both the Associate in Arts POS and the Digital Media/Multimedia Technology POS. See Degree Audits, Attachment 8, Items 4a and 4b.

Although the student had taken a prior math class (MAT1033), the Associate in Science degree requires MGF1106 or higher to fulfill the math requirement. See Degree Audits, Attachment 8, Items 4a. Accordingly the prior math class would not meet the requirement

Accordingly, regardless of the change made by the auto POS program, both classes taken during the term in question counted towards the student's intended major (Digital Media/Multimedia Technology). As such, the MGF1106 class can be used in the enrollment status calculation and this student should not be in the list of affected students.

Student 27

This student first applied via the web on March 18, 2011. On the application the student indicated Digital Media/Multimedia Technology as her requested POS. See College Credit Application, Attachment 9, Item 1a; Objective History Log, Attachment 9, Item 1b.

That summer, the student had a number of conversations with various advisors. Through those conversations, her primary and transfer POS were updated. The first updated occurred on June 20, 2011. On this date, an advisor (Tracey Blue) removed certain technical certificates from the student's POS (objective codes 6401, 6402, 6403). On June 21, 2011 her POS was updated to Associate in Arts (objective code 1108) by another advisor (Barbara Jackson). On July 13, 2011, the student completed another application for Bachelor of Science in Early Childhood Education (objective code T100). The application information was entered into the system by Linda Williams. On this date the student also spoke with an advisor (Sharon Hoose). At this time, the student's primary POS continued to be Associate in Arts and her transfer POS was undecided (objective code 000). See Objective History Log, Attachment 9, Item 2a; Comment Log, Attachment 9, Item 2b.

This student was run through the auto POS program on September 23, 2011. However, because Associate in Arts was already designated as her primary POS based on students discussions with advisors, the auto POS program did not make any changes. See Objective History Log, Attachment 9, Item 3. Associate in Arts has been the student's primary POS starting on June 21, 2011 through the present. See Objective History Log, Attachment 9, Item 4.

All courses in which the student has been enrolled, including SLS1103, are required for the Associate in Arts degree.² See Degree Audit, Attachment 9, Item 5. As such, all of the classes at issue can be used in the enrollment status calculation and this student should not be in the list of affected students.

² SLS1103 can be used as an elective under the Associate in Arts degree requirements.

As FSCJ has demonstrated above, ED erred in finding noncompliance in seven of the eight identified files. The single instance of noncompliance does not indicate a systemic issue and does not meet the threshold to trigger a full file review. For this reason, FSCJ requests that ED not require the full file review, but rather only hold FSCJ accountable for the single instance of noncompliance.

2. The Department's Interpretation Supporting the Disallowance is Unsupported By Law or Regulation and Cannot Support a Disallowance.

Finding 1 indicates that FSCJ violated Title IV by disbursing aid to students for coursework not required for a degree/certificate. The citation provided as notice of this requirement is the Federal Student Aid Handbook. The Handbook states, "If a student is enrolled in courses that do not count toward his degree, they cannot be used to determine enrollment status unless they are eligible remedial courses." No statutory or regulatory citation for the first part of the aforementioned sentence is provided in the handbook or in the Review Report.

To determine how much financial aid to disburse to a student, an institution must first determine the student's enrollment status. See 34 C.F.R. § 668.32; 2012-2013 Federal Student Aid Handbook, Volume 1. Pursuant to the regulations, not all classes in which a student may be enrolled count towards the student's enrollment status. Expressly identified by the regulations as *not* counting towards enrollment status are certain remedial courses (34 C.F.R. § 668.20) and certain classes that a student is repeating (34 C.F.R. § 668.2). Nowhere in the regulations does it state that non-remedial courses in which a student is enrolled that do not count towards the student's degree requirements may not be used to determine enrollment status. See 34 C.F.R. Part 600, et seq. Further there is no guidance or case law that expressly states such a requirement. See Office of Management and Budget, Final Bulletin for Agency Good Guidance Practices at 3 (Jan. 18, 2007), <http://www.whitehouse.gov/sites/default/files/omb/memoranda/fy2007/m07-07.pdf> ("Concern about whether agencies are properly observing the notice-and-comment requirements of the APA has received significant attention. The courts, Congress, and other authorities have emphasized that rules which do not merely interpret existing law or announce tentative policy positions but which establish new policy positions that the agency treats as binding must comply with the APA's notice-and-comment requirements, regardless of how they initially are labeled.")

Given the absence of an express statutory or regulatory requirement, FSCJ should not be liable for noncompliance. At the very most, a recommendation would be appropriate in such circumstances.

Finding 2: Ineligible Student – Not Making Satisfactory Academic Progress

Position: The College disagrees with this finding.

Justification: The finding incorrectly states that student 19 improperly received Title IV aid in Fall term 2011. In fact, the College did not award or disburse Title IV aid to this student for the term in question. The finding correctly states that the student was out of compliance with the College's satisfactory academic progress (SAP) policy for Fall term 2011. After completing the associate in arts degree at the conclusion of the Fall term 2011, the student was admitted to a baccalaureate program for the Summer term 2012. During the Summer term 2012, the student was in compliance with the SAP requirements of the baccalaureate program. The College properly awarded aid to the student for the summer term 2012.

Requested Resolution: The College requests this finding be eliminated from the final program review report.

Documentation: Student Program Objective History Screen.

STA771P1 ***** Student Information System *****
 Jan 3,13 - View Objective Log History by Program/Term - 1 more >

Student-ID: [REDACTED]

Log Date	Log Time	Act	PgmId	Term	Seq	Prim	Adm	Pgm	St	Trns	Mjr	User Name
05/09/12	3:34P	M	S100	20122	1	N	N	C	IN	DC		AMANDA L GODWIN
01/26/12	10:15A	A	S100	20123	1	Y	N	U	AC			CINDY A LYLE-FA
02/03/12	12:15P	M	S100	20123	1	Y	N	U	AC			LIN WHITE
02/03/12	12:15P	M	S100	20123	1	Y	N	U	AC			LIN WHITE
02/28/12	2:05P	M	S100	20123	1	Y	N	U	AC			LIN WHITE
03/12/12	8:28A	M	S100	20123	1	Y	Y	A1	AC			TERRY SAWMA
03/13/12	7:11P	M	S100	20123	1	Y	Y	R	AC			REGISTRATION WE
03/13/12	7:20P	M	S100	20123	1	Y	Y	R	AC			REGISTRATION WE
03/14/12	9:22P	M	S100	20123	1	N	Y	R	AC			REGISTRATION WE
03/17/12	7:52P	M	S100	20123	1	N	Y	R	AC			REGISTRATION WE
03/26/12	8:23A	M	S100	20123	1	N	Y	R	AC			JEAN BAKER

Student Award Summary

01/07/2013 - 2011-12 Award Summary - 12:26 PM

Student:	[REDACTED]	Admitted	Ineligible
-----FED Pell Grant-----			
Action:	G	Offered 2,775.00	Accepted 2,775.00
			Disbursed 2,775.00
	Fall		
	Fall30		
	Fallmid		
	Spring		
	Spr30		
	Spring		
	Summer	2,775.00	2,775.00
	Sum30		2,775.00
	Summid		
	Pellcover		

Finding 3: Financial Aid Verification Violations

Position: The College accepts this finding.

Resolution: The College has amended its verification procedures to require students to submit corrected verification forms if the College discovers errors on original forms.

Attachment: Revised Financial Aid Verification policy (Attachment 10)

Finding 4: Satisfactory Academic Progress Policy (SAP) Not Adequate/Incomplete

Position: The College accepts this finding.

Resolution: The College has engaged the services of a financial aid compliance consultant The Evans Consulting Group, Inc. ("ECG") to assist in the construction of a compliant SAP policy. The College will complete revisions to the policy for the 2013-14 award year and, as required in the review, will provide a written update to the Department by February 11, 2013.

Finding 5: Return to Title IV Policy (R2T4) Not Developed/Inadequate

Position: The College accepts this finding.

Resolution: The College has engaged the services of a financial aid compliance consultant ECG to assist in the construction of a compliant R2T4/Withdrawal policy. The College will complete revisions to the policy for the 2013-14 award year and will provide a written update to the Department by February 11, 2013.

Finding 6: Verification Policy Not Documented/Missing/Inadequate

Position: The College accepts this finding.

Resolution: The College has executed the required changes, and the revised policy is attached.

Attachment: Revised Financial Aid Verification policy (Attachment 10)

Finding 7: Drug Abuse Prevention Program Requirements Not Met

Position: The College accepts this finding.

Resolution: The College has constructed and has submitted its first biennial review as required in the finding. The College will complete its next biennial review by December 31, 2014 and will submit it to the Department of Education in January, 2015.

Attachment: Biennial report (Attachment 11)

Finding 8: Inaccurate Record Keeping

Position: The College accepts this finding.

Resolution: Four of the five student cases identified as errors in the program review report reflected late reports to COD as a result of system flaws in implementing the first Direct Loan process for the 2010-11 year. The College has corrected these system deficiencies. Further the College believes that current disbursement dates for COD and Student Ledger are aligned.

The fifth case was a student receiving a Pell Grant whose disbursement record was posted to COD 20 days prior to posting on the Student Ledger. This error represents an anomaly that occurs occasionally when the Financial Aid office submits a disbursement record for a student but a subsequent change in the student's record precludes actual disbursement to the student's ledger account without further review. This creates a timing issue between the date the disbursement record is submitted to COD and the date funds were posted to the Student Ledger. The College will work internally to resolve this issue and ensure that disbursement dates reported to COD reflect the same date as that posted to the Student Ledger. The College will report on revised procedures by February 11, 2013.

Finding 9: Student Underawarded Academic Competitiveness Grant

Position: The College accepts this finding.

Resolution: The College has engaged the services of a financial aid compliance consultant (ECG) to assist in the construction of a compliant awarding procedure. The College will complete revisions to the policy for the 2013-14 award year and will provide a written update to the Department by February 11, 2013.

Finding 10: Pell Underpayment

Position: The College disagrees with this finding.

Justification: The finding contends that student 28 was under awarded a Pell Grant. The student was originally enrolled for 9 credit hours. The student withdrew from 3 credit hours on January 22, 2012, which was prior to the census date and financial aid freeze date for the Spring term session one module (January 28, 2012.) Therefore, the Pell award based on 6 credit hours of enrollment is correct.

Requested Resolution: The College requests this finding be eliminated from the final report.

Documentation:

Student Transcript for 2012

Florida State College

20122 2011-12 (20122) 001484 BEGINNING 01/09/12 ENDING 05/04/12
PROG: (1108) AA ASSOCIATE IN ARTS

Course ID	Course Equivalent Course Title			Hours For		
		Grade	Attempt	Earned	GPA	
HUM2020	HUM2020	HUMANITIES FORUM	W	03.0	0.	0. T
LAH2000	LAH2000	HSTRY LATIN AMERICA	B	03.0	03.0	03.0
PHI2010	PHI2010	INTRO TO PHILOSOPHY	A	03.0	03.0	03.0

Registration (including Withdrawal) History Screen

STR381P0 ***** Student Information System *****
Jan 3,13 - View Registration History by Date - 2 more >

Student-ID.: [REDACTED], [REDACTED]
Term.: 20122 SPRING 2011-2012

Log Date	Log Time	Act	Course ID	Ref Num	Class Center	Session	Class Ty	Ovrd Option	Flag	User ID
12/08/11	12:57P	A	DEP2004	357056	C0300	1	01			WEB
12/13/11	11:18P	A	HUM2020	358289	C0300	1	01			WEB
01/09/12	10:57A	D	LAE2000	358341	C0300	1	01			WEB
01/09/12	12:20P	A	LAH2000	358341	C0300	1	01		X	BMCKAY
01/13/12	3:13P	D	DEP2004	357056	C0300	1	01			WEB
01/22/12	7:05P	W	HUM2020	358289	C0300	1	01			WEB
05/03/12	11:50A	M	PHI2010	358369	C0300	1	01			ccolavit
05/07/12	2:26P	M	LAH2000	358341	C0300	1	01		X	dalogan

*** End of Data ***

*Student ID: Eff Trm: 20122_ Log Date: _____ Log Time: _____

ESCJ appreciates the opportunity to provide its comments in response to the Program Review Report.

Respectfully submitted,

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

Dr. Judith Bilsky
Provost and Acting College President

Enclosures: Attachment Index and supporting documentation

cc: Mr. Steven Bowers
Dr. Tracy Pierce
Jeanne M. Miller, Esquire
Michael Brustein, Esquire

Attachment Index

Finding 1:

Attachment 1, Orion Legend

Attachment 2, Program Review Guide, page III-17

Attachment 3, Student 1

- Item 1, College Credit Application
- Item 2, Student Information Screen Objective Log
- Item 3, Comment Log
- Item 4, Registration History
- Item 5, Objective Log History
- Item 6, Registration History
- Item 7, Degree Audit

Attachment 4, Student 3

- Item 1, College Credit Application
- Item 2a, Objective History Log
- Item 2b, Change Form
- Item 2c, Degree Audit
- Item 3, Objective History Log
- Item 4a, Objective History Log
- Item 4b, Registration History
- Item 5a, Registration History
- Item 5b, Objective History Log
- Item 6, Registration History
- Item 7, Comment Log
- Item 8, Change Form
- Item 9, Objective History Log
- Item 10a, Permanent Academic Credit Record
- Item 10b, Degree Audit

Attachment 5, Student 5

- Item 1, College Credit Application
- Item 2a, Comment Log
- Item 2b, Objective Log History
- Item 3a, Comment Log
- Item 3b, Associate in Arts Degree Audit
- Item 4, Objective History Log
- Item 5, Application
- Item 6a, Student Comments
- Item 6b, Degree Audit (page 4)
- Item 7, Objective History Log

Attachment 6, Student 9

- Item 1, College Credit Application
- Item 2, Application for Student Membership
- Item 3, Objective History Log
- Item 4, Degree Audit

Attachment Index

Page Two

Attachment 7, Student 19

Item 1a, Request for Change of Program or Place of Training

Item 1b, Comment Log

Item 1c, Objective History Log

Item 1d, Student Program Objective

Item 2, Degree Audit

Attachment 8, Student 22

Item 1, Application for Student Membership

Item 2a, College Credit Application

Item 2b, Readmission Application

Item 2c, Objective History Log

Item 2d, Comment Log

Item 3, Unofficial Transcript

Item 4a, Degree Audits

Item 4b, Degree Audits

Item 5, Objective History Log

Attachment 9, Student 27

Item 1a, College Credit Application

Item 1b, Objective History Log

Item 2a, Objective History Log

Item 2b, Comment Log

Item 3, Objective History Log

Item 4, Objective History Log

Item 5, Degree Audit

Finding 2: Documentation within report

Finding 3: Attachment 10, Revised Financial Aid Verification policy

Finding 4: No attachment

Finding 5: No attachment

Finding 6: Attachment 10, Revised Financial Aid Verification policy

Finding 7: Attachment 11, Biennial Report

Finding 8: No attachment

Finding 9: No attachment

Finding 10: No attachment

ATTACHMENT 1

Your first 10 programs of study are listed below. Click on the program title to get more information about that program's graduation requirements and run a degree audit. The programs are listed in order by the percentage of completion (degree audit benchmark) for the program.

Click [here](#) to submit Program Objective Change Form

Program Type	Program Code	Program Name	Effective Term	Program Status	Admit Status	Potential Grad	Exp/Actual Grad Term	% Complete	Applied Program
AA	1109	HEALTH PE AND RECREAT	19744	GR	Y			100%	
ND	3403	PERSONAL ENRICHMENT	20131	AC	Y				*
NC	8403	PERSONAL ENRICHMENT	20091	AC	Y				*

Legend

Program Type: AA = Associate in Arts; AS = Associate in Science; AAS = Associate in Applied Science; TC = Technical Certificate; ATC = Applied Technical Certificate; ATD = Applied Technical Diploma; ND = Non degree seeking; HS = High school completion; VC = Vocational Certificate; NC = non-college credit programs; BSN = Bachelor of Nursing; BAS = Bachelor of Applied Science; BS = Bachelor of Science and F = Educator Preparation Institute

Program Status: AC = active program and GR = indicates graduate of the program

Admit Status: Y = admitted to the program and N = not admitted to the program. This is important if you selected a limited or selective access program of study. See your program manager for admission requirements

Potential Grad: An X in the box indicates you are eligible to graduate from the program as long as all requirements are met. These requirements include for all programs: GPA of 2.0 and program hours.

Exp/Actual Grad Term: If you are a potential grad or have graduated from a program, the term in which you will or have graduated is in this column

% Completed + X: You have reached this benchmark

% Completed + *: You will reach this benchmark upon successful completion of your courses this term

% Completed: A blank area indicates this is a non-degree seeking program of study and no degree audit is available or you have not achieved at least 25% of program completion

Applied Program + *: This is the program you chose during the application process

What is a Program of Study?

At Florida State College at Jacksonville, your educational goal is called a program of study, and includes degree and certificate programs as well as special programs such as high school dual enrollment or adult literacy

I see programs of study on my list which I did not choose. How did that happen?

At the time of admission:

- If the program you selected is an AS degree with associated technical certificates, all of the associated technical certificates are added to your list as well

Will these added programs affect my graduation, financial aid or VA?

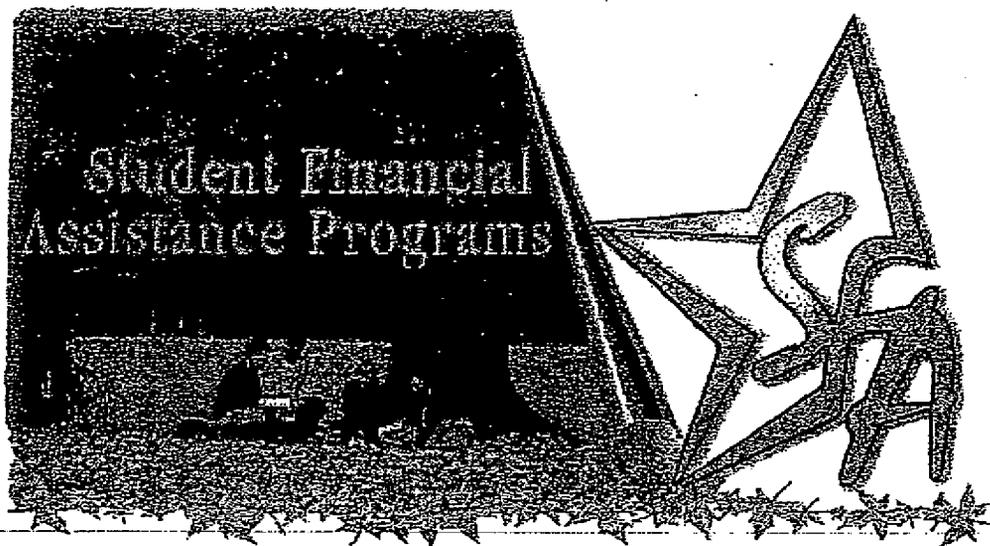
The good news is the added programs can only help you

- The added technical certificate programs will allow you to receive diplomas in specific areas along your way until you graduate from your chosen associate in science program of study once you complete all program courses and GPA requirement
- VA students - if you are receiving VA financial aid benefits, your program list will not change, since you are required to take only courses that apply to a single program of study

If you have any questions about your programs of study, please contact your advisor or program manager.

ATTACHMENT 2

Program Review Guide



U.S. Department of Education

Prepared by:
Case Management and Oversight
Schools Channel
Student Financial Assistance

August 31, 2001

We Help Put America Through School

reasonable procedures. Generally, this means following normal program review procedures, taking reliable notes of interviews with school personnel and students, and making legible copies of pertinent documents.

H. Evaluating Program Review Results

Once the program review site visit is completed, the CMT must evaluate the results. Reviewers should consult with the CMT, CTLs/ACD, and AAAD liaison, to determine the appropriate course of action. Depending on the severity of any violations, actions may include:

- referral to the IIS for technical assistance;
- development of a corrective action plan to rectify the problem;
- assessment of liabilities;
- immediate transfer to the reimbursement system of payment or to heightened cash monitoring;
- referral to AAAD for administrative action, including emergency action, when appropriate; and/or
- immediate notification of the Office of Inspector General (OIG), if fraud is suspected.

1. File Reviews

As previously noted, reviewers can require that an institution perform reviews of its records (file reviews) to ascertain the extent of a deficiency that appears to be systemic and material. Generally, an error rate of greater than 10 percent for any given award year would signal a systemic problem. (Refer to IRB Memorandum Target Numbers and Reviewer Discretion, issued 12/6/95.)

A material deficiency is one which may result in funds payable to the Title IV programs or students, or one in which the nature and frequency of the problem may be serious enough to warrant a fine or other administrative action. For example, reviewers discover in the file review that tax returns were not being collected for most students who were selected for verification. The school should be required to review all students who were selected for verification in the applicable award year(s), and identify funds that were disbursed without verification being completed. In an expanded review, reviewers (having discussed time and staff availability with the supervisor) may decide to review the files for the students in the statistical sample, instead of having the school do it.

In most cases, to determine liabilities payable to the Title IV programs, an institution should be offered the choice of performing file reviews using the

ATTACHMENT 3

Attachment 3 – All documents are student records. Withheld per FERPA and F.S. 1002.225

ATTACHMENT 4

Attachment 4 – All documents are student records. Withheld per FERPA and F.S. 1002.225

ATTACHMENT 5

Attachment 5 – All documents are student records. Withheld per FERPA and F.S. 1002.225

ATTACHMENT 6

Attachment 6 – All documents are student records. Withheld per FERPA and F.S. 1002.225

ATTACHMENT 7

Attachment 7 – All documents are student records. Withheld per FERPA and F.S. 1002.225

ATTACHMENT 8

Attachment 8 – All documents are student records. Withheld per FERPA and F.S. 1002.225

ATTACHMENT 9

Attachment 9 – All documents are student records. Withheld per FERPA and F.S. 1002.225

ATTACHMENT 10

FINANCIAL AID VERIFICATION POLICY
(REVISED JANUARY 7, 2013)

The following procedures and policy are in accordance with federal regulations: 34 C.F.R. 668.53. Florida State College at Jacksonville will verify financial aid information if a student is selected by the Department of Education or conflicting information has been reported. When a file is selected for verification, a student and/or parent must complete a verification worksheet and submit a tax transcript from the IRS or complete the IRS Data Retrieval process when completing their FAFSA (Free Application for Federal Student Aid). Students may also be required to submit other required documents. Students must submit all documents in order to complete his or her file.

A. Notification:

1. Students selected for verification must submit documentation for the verification process before official financial aid eligibility can be determined. When a student is selected for verification, the student will be notified as follows:
 - a. The U.S. Department of Education will notify the student on their Student Aid Report (SAR) if selected by the federal government.
 - b. Florida State College at Jacksonville will notify the student in Connections on their financial aid checklist of the required documentation. It is the student's responsibility to periodically review their financial aid checklist for new information regarding their application status.

B. Items to be Verified:

1. The Office of Financial Aid according to 34 C.F.R. Part 668.56 will verify the specified items listed below:
 - a. U.S. Income Tax data
 - b. Number enrolled in college
 - c. Household size
 - d. Certain untaxed income and benefits
 - i. Child support
 - ii. Supplemental Nutrition Assistance Program (SNAP)
 - iii. IRA/Keogh deductions
 - iv. Tax-exempt interest
 - v. Untaxed portions of pensions
 - vi. Payments to tax-deferred pension/savings plans (found on W-2)
 - vii. Additional items due to conflicting information

C. Documentation:

1. Students selected for verification must submit a verification worksheet along with required documentation for the specific items listed on their financial aid checklist in Connections. If it is determined that the information on the verification worksheet is incorrect, the student must submit a corrected worksheet. To verify income, students and their parents (dependent) or spouse (independent students) will be required to submit an IRS Tax Return Transcript or use the IRS Data Retrieval Tool. Parents or students not required to file taxes must submit a letter of non-filing from the IRS and photocopies of related W-2's. Photocopies of tax returns are no longer acceptable documentation unless allowed under federal regulations for specific criteria such as an amended tax return.

2. The Office of Financial Aid may seek additional information whenever conflicting information is discovered in a student's application for financial aid.
3. Documentation from the issuing agency received from Supplemental Nutrition Assistance Program (SNAP) benefits and documentation of child support payment, if applicable, will be required.
4. Any conflicting information must be resolved before financial aid funds are awarded or disbursed. A student who does not provide the required documentation may lose financial aid eligibility. After the student provides all required documentation, the Office of Financial Aid will complete the verification process. The verification process may take approximately 30 days to complete.

D. Deadlines:

1. Applicants are strongly encouraged to submit the required verification forms as soon as they are notified via Connections they have been selected for verification. To be processed prior to the drop deadline for the term all complete and correct forms must be received prior to the financial aid processing deadline posted on the College's Website. Incomplete forms are not accepted. Incorrect forms are not considered "received" until the date the student makes all corrections to the forms. The deadline for submitting verification documents is 120 days from the applicant's last date of enrollment or August 1 of the academic year in which the student was selected, whichever comes first.

E. Consequences:

1. If an FAFSA is selected for verification, the student must complete the verification process before the College will exercise its authority to change the cost of attendance or the values of any data items required to calculate expected family contribution (EFC). No federal aid will be awarded until the verification process is complete. The student should be prepared to make other payment arrangements if the verification has not been completed by the payment deadline.
2. If aid has already been disbursed to the student before being selected for verification, no further disbursements will be made until verification has been completed.
3. Failure to provide the required documents within the timeframe listed above will result in a student being denied federal funds for that year.
4. Students are notified in Connections of the documentation required and the status of the financial aid application.

F. Verification Process, Conclusion and Communication:

1. Once the verification process is complete, the appropriate corrections will be made to the student's financial aid file and the revised file will be submitted to the Department of Education electronically. Students will receive a revised SAR once the corrections have been processed.
2. The institution will also receive an electronic file from the Department of Education once the corrections have been processed. Verification is not complete and financial aid funds will not be disbursed until the electronic file has been received by the institution.
3. Any changes to the student's EFC or award will be communicated to the student through the financial aid section of the Connections Student Portal.

4. The student will be notified via an updated financial aid checklist in Connections or by campus staff of any additional documentation needed.
5. After the student has provided all documentation required for verification, the documentation will be reviewed and awards posted, if applicable.
6. Student should check their financial aid information in Connections on a regular basis for any changes that may result.

ATTACHMENT 11

**Florida State College at Jacksonville
Drug and Alcohol Abuse Prevention Program
Biennial Review
January 4, 2013**

Prepared and Submitted by the Office of the Vice President for Student Services with assistance from the Office of the Vice President of Human Resources

Introduction

Florida State College at Jacksonville is committed to providing an environment that enhances and supports student success. As a public institution whose mission is to foster human potential, Florida State College at Jacksonville believes it is important to understand the health risks and other detrimental consequences associated with drug and alcohol abuse. The academic community, including faculty, administrators, staff and students, has the collective responsibility to ensure that this environment is conducive to the student's development. The illegal use of harmful and addictive chemical substances poses a threat to the educational environment. Thus, in accordance with the Drug Free Schools and Communication Act Amendments of 1989, signed by President George H. W. Bush, the College regularly informs the College community of the harmful and addictive potential associated with the use of drugs, the incompatibility of illegal drugs with the educational mission of the college, and the consequences of the use, possession, manufacture or sale of such drugs.

Program Components

The components of the college's drug and alcohol abuse education prevention program fall into two major categories:

1. Student Policy, Procedure and Communication
2. Student On Campus Programming and Student Support
3. Employee Communications, Policy and Support

Policy and Procedure

The Florida State College at Jacksonville District Board of Trustees Rules outlines the accepted code of conduct for students and employees. The code includes the following.

- Any act or behavior on the part of the student which tends to interfere with or otherwise disturb the orderly conduct, processes, functions and/or interests of the College is prohibited:

- Such acts or behaviors may include but are not limited to the following: consumption of alcoholic beverages on campus or at a College function, illegal use or possession of drugs or narcotics on campus or at a College function.

- The College reserves the right to suspend, terminate or retroactively cancel the enrollment of any student for disciplinary reasons. The College may also make a referral to legal authorities for appropriate action.

These policy statements are published annually in the online catalog and the student handbook.

A complete set of charts outlining the penalties for federal drug trafficking and the controlled substances involved are maintained in each campus counseling and advising center (Appendix A).

On Campus Programming and Student Support

Florida State College at Jacksonville is a commuter institution. While the college now offers 4-year baccalaureate programs, it is a primarily associate degree granting institution. As a non-residential institution, the college is effective in preventing drug and alcohol abuse issues from intruding into college life. Nonetheless, college administration is aware of the societal impacts of alcohol and drugs and the probabilities that students may struggle with destructive addictions or even occasional use patterns that might interfere with the achievement of academic and life goals or lead to other emotional, physical and social consequences, including criminal consequences.

The college revised and adopted new college goals in 2010. The new goals include college goal two which states the following:

Inspire students to a lifetime commitment to continued learning, informed civic engagement, ethical leadership, cultural appreciation, social responsibility and

multicultural awareness in an interconnected world.

The college's office of student life and leadership, which is represented on each of the college's campus locations, provides programming for students each year which is relevant to the learning dimensions identified in this goal. Alcohol and drug abuse prevention and awareness are consistent with two of these dimensions: social responsibility and continued learning (in which wellness is a sub-dimension).

Student Life addresses alcohol and drug awareness in variety of ways. Through student life, the college partners with the BACCHUS Peer Education Network, BACCHUS stands for Boosting Alcohol Consciousness Concerning the Health of University Students, and though its name addresses only alcohol, BACCHUS campaigns also include drug awareness and education, STD awareness and education, and healthy student lifestyles in general. The college participates in a Safe Spring Break poster campaign that addresses all the above issues. Posters addressing the dangers of binge drinking, drug abuse, and driving under the influence are placed in high traffic areas several weeks before spring break.

Additionally, each campus participates in the Great American Smoke out on our around November 15 of each year. Smoking Cessation classes have been offered at all campuses through a grant with Area Health Education Center (in conjunction with Human Resources). Each campus also coordinates an annual health fair in the fall that addresses all areas of student health, including alcohol and drug awareness.

Specific campus events include:

Downtown Campus: Downtown hosted the Man Up For Health Summit (summer 2011 and 2012). As a part of the department's health and wellness series, Student Life co-sponsored the Man Up for Health Summit, aiming to serve males from the campus community & surrounding community with various health screenings, cosmetology service, nutrition information and etc. Within this event, topics such as drug and alcohol awareness are also built in through the various community vendors that attend this event and the literature distributed in the event, along with the varied workshops offered. This event serves to strengthen the college's partnership with its many community partners.

North Campus: Red Ribbon Week – groups of four to five students from cross disciplines (Dental Hygiene, Dental Assisting, Respiratory Care, Radiation Therapy, and Occupational Health Therapy) created presentations and multimedia posters addressing the

dangers of tobacco, drug, and alcohol abuse. The groups presented at area middle schools and at Florida State College at Jacksonville campuses and Deerwood Center.

Kent and South Campuses: For the past two years, Kent and South have partnered with U.N.I.T.E. (www.dwiprevention.org) to bring to campus a drunk driving and texting while driving simulator. This program gives students literal hands-on experience on what it's like to drive while drunk or while texting. We often pair the simulator with a BACCHUS table with additional information on drug awareness and STD awareness. The simulator is on each campus for six hours, so we are able to reach a high number of students throughout the day.

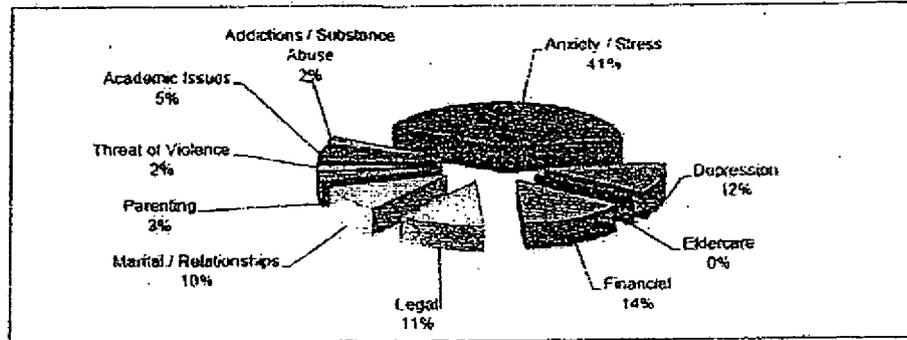
While these forms of activities and messaging might be effective for awareness, the College has also undertaken an aggressive strategy to help students cope with and gain treatment for detrimental behaviors related to alcohol and drug use. Following an extensive collaboration with faculty and competitive proposal process, the College launched a comprehensive Student Assistance Program, providing students with a resource for external personal counseling in the 2011-12 academic year. This initiative grew from increasing anecdotal reports from faculty of student struggling with stress and emotional hardships often connected to home economic issues, issues surrounding personal or family military deployment and re-entry, or a combination of both. The construction of the Student Assistance Program recognized that drug and alcohol abuse could either manifest as a root-cause issue or as an injurious coping strategy for greater stressors.

The Student Assistance Program implementation included a strong component of internal staff training and appropriate policy and procedure development for student referral. It also included and continues to include a robust marketing component to encourage students with personal, family and life issues, including those involving drugs and alcohol, to seek counseling services (Appendix B).

The results of this program demonstrate the efficacy of the staff training and marketing efforts. From August 2011 to June 2012, 384 students pursued Student Assistance Program Services. Eight of those students (2 percent) sought services relative to substance or alcohol abuse problems. The chart below shows the complete analysis of the Student Assistance Plan counseling program for students in 2011-12.

Utilization Report
FSCJ Student Assistance Program
August 2011-June 2012

Presenting Problems



Description	Aug 2011	Sep 11	Oct 11	Nov 11	Dec 11	Jan 12	Feb 12	Mar 12	Apr 12	May 12	June 12
Academic Issues	2	4%	9	7%	7	6%	3	4%	2	3%	2%
Addictions / Substance Abuse	0	0%	3	2%	3	2%	2	3%	2	3%	2%
Anxiety / Stress	18	32%	49	39%	53	41%	36	49%	45	41%	31%
Depression	9	16%	14	11%	18	14%	4	6%	10	12%	12%
Elder care	0	0%	0	0%	1	1%	0	0%	1	1%	1%
Financial	13	20%	18	14%	16	13%	8	11%	27	23%	14%
Legal	5	9%	17	13%	12	9%	10	14%	14	11%	11%
Marital / Relationships	8	14%	10	8%	14	11%	6	8%	36	30%	10%
Parenting	1	2%	5	4%	3	2%	2	3%	11	9%	3%
Threat of Violence	2	4%	2	2%	1	1%	2	3%	2	2%	2%
TOTAL	56		127		126		73		384		100%

It should also be noted that the College's District Board of Trustees adopted policy in 2012 to make College facilities completely smoke-free in March 2013. Since the Board's action, a committee was formed with broad representation from the college community to develop an implementation program. Representatives from other community health organizations have assisted with the development of this program. Support and smoking cessation programs are planned for both students and employees in early 2013 to implement the policy on time in March.

Employee Communication, Policy and Support

Employees of the College and those who wish to become employed with the College are advised on a regular basis by multiple methods that Florida State College at Jacksonville maintains a Drug-Free College Environment and that all are required to comply with the College's Rules and administrative procedures relative to substance use and abuse.

The attached summary (Appendix C) identifies the College's requirements, communication of requirements, drug-free information and obligation to student expectations, risk management, and individual and group training, coaching, and counseling at the 1. pre-employment, 2. new hire induction and socialization, and 3. active employment phases of affiliation with the College. In brief,

1. During pre-employment, an applicant is required to affirm by signature on the application for employment his or her understanding that the College maintains a drug and alcohol free work environment and agrees to submit to a laboratory screening for controlled substances (FS 893.03 and/or Section 202, Schedules I and II) if offered employment. The applicant further agrees not to engage in the unlawful manufacture, distribution, possession or use of controlled substances while on College property or while conducting any activity involving the College.
2. During new hire induction and socialization, an employee submits to drug screening, reads and acknowledges the Drug Free Workplace Act information, and affirms the College's Code of Ethics, among others. At the required new employee onboarding, College policies and procedures are overviewed, legal and ethical considerations are discussed, and risk management requirements and concerns are addressed. During Benefits Orientation and enrollment, care programs available under the College's health plan are described and information about the Employee Assistance program is provided.
3. Active employees receive monthly updates on the College's HR website about healthy lifestyle and care matters, employee assistance communication (Corporate Care Works-EAP) and employee handbooks are updated annually along with Benefits Summary booklets, all of which contain information about the requirements of the College's Drug Free College environment, expected standards of conduct, disciplinary measures for non-compliance, and coaching and counseling assistance. Corporate Care Works presents at the College's annual employee Convocation and the annual College Wellness Fair.

The Associate Vice President of HR receives a quarterly utilization summary from the EAP that is reviewed for "presenting problems" and follow up, as needed.

The College annually reviews disciplinary actions taken against employees for two reasons: to provide information to our insurance vendor for Errors and Omissions policy, and to analyze areas of non-compliance with College Rules for purposes of training and retraining. With regard to non-compliance with Drug Free College Environment, for the period of January 1, 2011 to September 30, 2012, there have been no reported incidents of employee non-compliance and thus no disciplinary action and four self-referrals to the EAP for assistance with substance abuse, as follows:

Utilization Report

FSCJ-EAP

From: January 01, 2011 To: December 31, 2011

Addictions/Substance Abuse	1	2.8%	0	0.0%	2	6.3%	0	0.0%	3	7.9%
Anxiety / Stress	10	25.6%	3	18.8%	7	29.2%	9	34.6%	29	29.0%
Depression	2	6.1%	1	6.3%	5	20.8%	3	11.5%	11	10.6%
Financial	2	5.1%	1	6.3%	1	4.2%	1	3.8%	5	4.8%
Legal	14	35.8%	1	6.3%	0	0.0%	5	19.2%	20	19.0%
Marital / Relationships	6	15.4%	6	37.5%	5	20.8%	4	15.4%	21	20.0%
Parenting	3	7.7%	2	12.5%	0	0.0%	3	11.5%	8	7.8%
Workplace Issues	1	2.8%	2	12.5%	4	16.7%	1	3.8%	8	7.8%
TOTAL	39		16		24		26		105	

Utilization Report

FSCJ-EAP

From: January 01, 2012 To: September 30, 2012

Academic Issues	1	2.3%	0	0.0%	0	0.0%			1	0.9%
Addictions/Substance Abuse	1	2.3%	0	0.0%	0	0.0%			1	0.9%
Anxiety / Stress	12	27.3%	12	31.6%	7	24.1%			31	27.8%
Depression	6	11.4%	3	7.8%	4	13.8%			12	10.8%
Eldercare	1	2.3%	0	0.0%	1	3.4%			2	1.8%
Financial	2	4.5%	2	5.3%	2	6.9%			6	5.4%
Legal	9	20.5%	7	18.4%	7	24.1%			23	20.7%
Marital / Relationships	4	9.1%	9	23.7%	5	16.1%			18	16.2%
Parenting	3	6.8%	2	5.3%	3	10.3%			8	7.2%
Workplace Issues	6	13.8%	3	7.8%	0	0.0%			9	8.1%
TOTAL	44		38		29				111	

While the College does not annually distribute the required information to each employee individually in writing, but rather provides the information by multiple other means as described, effective March 1, 2013 and thereafter annually, the requirements will be provided to each individual employee in writing.

Future planned actions of the College include the hiring of a Health and Wellness Program Coordinator, expected February, 2013 who will be responsible for increasing training efforts and employee compliance with College rules and administrative procedures. The College is also exploring enhancing our Workers Compensation program to include required drug screening post-accident or injury.

Measurement

The research methodology and analysis of the College's current program is in the form of a statistical analysis of crime and security incidents related to alcohol and drug use in the College. This level of analysis is foundational and will be improved in future years to better gauge student behavior and behavioral changes related to drug and alcohol use.

Currently, the College's incidents of on-campus alcohol consumption were two in 2011, having been zero the previous two years. Incidents of drug possession or use on campus have remained low given that this college, comprising all programs, is a 70,000-student community. In 2009 there were 16 security incidents involving drugs. In 2010, the number dropped to 7 and remained at 7 for 2011 (Appendix D).

Disciplinary disposition of these incidents (2010 and 2011) are described in Appendix E and demonstrate that the appropriate sanctions as described in the expectations for student conduct are consistently enforced.

Future Activities and Recommendations

While incidents on campus are few, Student Assistance Program data indicate that a portion of our population is grappling with alcohol and drug issues. Over the next two years, the college will accomplish the following related objectives.

1. Through focus groups and surveys or other research methodologies, improve the quantifiable description of the institutional condition regarding drug and alcohol use among students.
2. Modify programming under the social responsibility dimension of its student development goals to address the findings of the research described above.
3. Measure the effectiveness of such programming prior to the submission of the 2015 biennial review.
4. Modify catalog to include a detailed listing of health consequences associated with the use of illicit drugs and alcohol.

Prepared:

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

Dr. Tracy Pierce
Vice President of Student Services

Respectfully Submitted:

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

Dr. Judith Bilsky
Provost and Acting President

Appendix B

FLORIDA STATE COLLEGE
 FRESH START FOR A BETTER FUTURE

Employee Portal **SEARCH** **HELP** **CONTACT US**

Future Students Current Students Alumni/Parents

Student Assistance Program

College life can be exciting. You're learning new things and meeting new people. But it can also be stressful trying to balance classes, personal responsibilities and maybe a job. Or, it could be that you're facing more serious issues that you can't handle by yourself. When you feel overwhelmed, we're here to help.

Because we understand the problems students face, Florida State College has created the Student Assistance program to provide you with the resources you need to cope with college-related, personal, legal or financial issues that may be affecting your studies and your ability to do your best. Services are free and confidential and are available in-person, online or by phone.

Student assistance is a solution...

- Academic assistance
- Confidential stress consultation and assessment
- In-person counseling with a licensed network provider
- Individualized instructional materials and resources
- Legal/financial consultation
- Risk assessment for substance abuse or behavioral problems
- Information on health and wellness, including an on-campus clinic

What issues are you facing?

- Relationship or family issues
- Burn-Out
- Financial problems
- Stress/Anxiety
- Substance management
- Alcohol or drug abuse
- Legal problems

Let us help!

The college years should be some of the best of your life. Don't let the stress you may have keep you from enjoying them and preparing for the great future you have ahead. Get the help you need today.



Appendix C
Summary of Employee Outreach

Pre-employment:

- Rules of the District Board of Trustees / Administrative Procedures Manual (24/7 Public Accessible):**
 - Rule 6Hx7-1.2: Compliance with Rules**
 - Rule 6Hx7-2.22: Drug-Free College Environment (identifies provisions and definitions).**
 - Rule 6Hx7-2.28: Standards of Conduct and Compliance for Employees.**
 - APM 02-1800: Drug-Free Work Environment (identifies procedures, definitions, resulting actions).**
 - APM 03-1301: Employee Assistance/Counseling (employee procedures)**

APOLLO Application

- Drug and alcohol free work environment acknowledgement;**
- pre-employment and reasonable suspicion screening;**
- agreement to not engage in unlawful manufacture, distribution, possession or use of controlled substance while on College property.**

Offer of Employment Letter

- Pre-employment drug test is a condition of employment;**
- may not begin employment without a successful screening;**
- Benefits Summary attached which includes EAP information.**

Employment Paperwork Package

- Drug-Free Workplace Act of 1988 acknowledgement;**
- reference to Board Rule and potential consequences for violation.**
- Code of Ethics - Education Profession acknowledgement (full-time employees);**
- protect the student from conditions harmful to learning and/or to the student's mental and/or physical health and/or safety.**

Employee Onboarding

Policies and procedures overview;
intranet navigation exercise;
legal and ethical considerations;
risk management.

Benefits Enrollment

Health insurance - Care programs; Web MD; health coaches; care consultants; care coordination program; lifestyle improvement programs.;
EAP overview.

Active Employees

Rules of the District Board of Trustees / Administrative Procedures Manual (24/7 Public Accessible)

Rule 6Hx7-1.2: Compliance with Rules

Rule 6Hx7-2.22: Drug-Free College Environment (identifies provisions and definitions).

Rule 6Hx7-2.28: Standards of Conduct and Compliance for Employees.

APM 02-1800: Drug Free Work Environment (identifies procedures, definitions, resulting actions).

APM 03-1301: Employee Assistance/Counseling (employee procedures).

APOLLO Application (apply for vacancies)

Drug and alcohol free work environment acknowledgement;

pre-employment and reasonable suspicion screening;

agreement to not engage in unlawful manufacture, distribution, possession or use of controlled substance while on College property.

Human Resources Web Site (24/7 access)

Faculty Handbook - Standards of conduct and compliance for employees; student conduct; EAP information; safety and security information.

Administrative, Professional and Career Employee Handbook - Standards of conduct and compliance for employees; notification of drug free workplace and reference to policy; EAP information.

Corporate Care Works (EAP Provider) - Monthly newsletters in English and Spanish on main page; highlighted summary page; contact information.

Employee Assistance link - Directly links to the College procedures for seeking assistance.
BCBSFL (Health insurance provider): Care programs; Web MD; health coaches; care consultants; care coordination program; lifestyle improvement programs.

EAP Utilization Report

Quarterly summary of service utilization.

EAP Outreach Efforts

Availability/Presentation at the annual College Convocation.
Availability/Presentation at the annual College wellness fair.

Appendix D

Florida State College at Jacksonville Annual Crime Statistics
Crime Statistics for January - December 2011

Location	Reported Incidents on College Property										
	Criminal Homicide	Sex Offenses	Aggravated Assault	Robbery	Burglary	Motor Vehicle Theft	Weapons	Alcohol	Drugs	Arson	Hate
Downtown	0	0	0	1	0	0	1	0	7	0	0
East	0	0	0	0	0	0	0	0	0	0	0
North	0	0	2	0	1	1	0	0	0	0	0
South	0	0	0	0	0	0	1	2	0	0	0
Deerwood	0	0	0	0	0	0	0	0	0	0	0
Northeast	0	0	0	0	0	0	0	0	0	0	0
Coast	0	0	0	0	0	0	0	0	0	0	0
ACCE	0	0	0	0	0	0	0	0	0	0	0
Total	0	0	2	1	1	1	2	2	7	0	0
Jan - Dec 2011	0	0	2	2	0	1	6	0	7	0	0
Jan - Dec 2010	0	0	0	2	2	4	3	0	16	1	0
Jan - Dec 2009	0	0	0	2	2	4	3	0	16	1	0

*Includes Administrative Office, Urban Resource Center, Advanced Technology Center and Central Stores/Main Street complex.

Notes:
 Criminal Homicide - Murder and manslaughter.
 Sex Offenses - Forcible or non-forcible.
 Burglary - Burglary in structures.
 Weapons - Alcohol - Drugs - Arrests or person referred for campus disciplinary action for liquor law violations, drug-related violations, and weapons possession.
 Hate - Crimes involving bodily injury to any person in which the victim is intentionally selected because of the actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability of the victim. This reflects those crimes reported to campus security or local police agencies where data shall be collected and reported according to the category of prejudice.

Appendix E
Disposition of Drug and Alcohol Related Offences 2010 and 2011

2010

Campus	Charge	Disciplinary Action Taken
Downtown	Possession of marijuana - not more than 20 grams	Dual enrolled Pathways Academy student. Issued a temporary order of suspension. JSO issued a Notice to Appear in Court. Following disciplinary hearing, allowed to return to school and required to complete 50 hours of community service within the year.
Downtown	Possession of marijuana and intent to sell within 200 feet of a school.	Pathways Academy Charter High School student. Arrested by JSO. Disciplinary action administered through Pathways Academy Charter High School.
Downtown	Possession of marijuana - not more than 20 grams	Pathways Academy Charter High School student. Disciplinary action administered through Pathways Academy Charter High School.
Downtown	Possession of marijuana - not more than 20 grams	Not a student. Arrested by JSO and Trespass Warning issued for campus.
Downtown	Possession of marijuana - not more than 20 grams	Pathways Academy Charter High School student. Arrested by JSO. Disciplinary action administered through Pathways Academy Charter High School.
South	Possession of marijuana - not more than 20 grams and possession of drug paraphernalia	Suspended for two semesters. Must complete drug education course from licensed counselor prior to returning. Mentor assignment.
Kent	Possession of marijuana - not more than 20 grams and possession of drug paraphernalia	Student withdrew from college prior to administration of discipline and a hold was placed on his record.

2011

Downtown	Larceny-Theft \$300 or more, Possession of weapon on school property. Once arrested, cocaine and drug paraphernalia found in backpack. Charged with Possession of cocaine.	Suspended from campus, discipline hold put on student's record to contact Dean for hearing if returns to campus.
Downtown	Possession of marijuana - not more than 20 grams	Not a student. JSO issued Notice to Appear in court. Trespass Warning issued for campus.
Downtown	Possession of marijuana - not more than 20 grams. Using obscene communications	Not a current student. Arrested by JSO- Trespass Warning issued for campus.
Downtown	Possession of marijuana - not more than 20 grams	Pathways Academy Charter High School student. JSO issued a Notice to Appear in court. Disciplinary action administered through Pathways Academy Charter High School.
Downtown	Possession of marijuana - not more than 20 grams	Not a current student at time of incident. Arrested by JSO. Temporary order of suspension from campus issued. Discipline hold put on student's record to contact Dean for hearing if returns to campus.
Downtown	Possession of marijuana - not more than 20 grams	Student was suspended for 1 year and allowed to return Fall term 2012.
Downtown	Possession of marijuana - not more than 20 grams	Student was suspended for 1 year and allowed to return Fall term 2012.
Downtown	Possession of marijuana - not more than 20 grams	Not a student. Arrested by JSO and trespass warning issued for campus.
South	Possession of alcohol. Illegal use or possession of drugs or narcotics.	Suspended for one semester.
South	Possession of alcohol. Illegal use or possession of drugs or narcotics.	Student withdrew from college prior to administration of discipline and has not returned.

Finkelstein, Jon

From: Pierce, Tracy A. <Tracy.Pierce@fscj.edu>
Sent: Monday, February 11, 2013 5:42 PM
To: Finkelstein, Jon
Cc: Holcombe, Willis N; Miller, Jeanne M.; Bilsky, Judith
Subject: Florida State College at Jacksonville Program Review Update
Attachments: DRAFT_REV_SAP02112013103400.pdf; DRAFT_WHDRWL02112013103522.pdf; COD_02112013103609.pdf

RE: Program Review Report
Florida State College at Jacksonville
OPE ID: 00148400
PRCN: 201240428075

Dear Mr. Finkelstein:

In Florida State College at Jacksonville's response to the referenced program review, four findings required written update to the department by February 11, 2013.

Finding 4: Satisfactory Academic Progress Policy (SAP) Not Adequate/Incomplete

Update: The College has drafted revisions to its SAP policy with guidance and consultation from the Evans Consulting Group. The revised policy (attached) is currently moving through the College's required governance process for approval. The policy will be in effect for the 2013-14 award year.

Finding 5: Return to Title IV Policy Not Developed/Inadequate

Update: The College has drafted its Institutional Withdrawal procedure with guidance and consultation from the Evans Consulting Group. The revised procedure (attached) is currently moving through the College's required governance process for approval. The procedure will be in effect for the 2013-14 award year.

Finding 8: Inaccurate Record Keeping

Update: The College has clarified the order and process of data processing jobs in a COD reporting procedure to ensure that for each student the disbursement date reported to COD and the date of credit to the student's account is the same. The revised procedure is attached and is in effect.

Finding 9: Student Under-awarded Academic Competiveness Grant

Update: The Evans Consulting Group recently completed a comprehensive analysis of the College's award procedure. The College is in the process of implementing recommended changes. The College will update the Department with its revised awarding procedure by March 11, 2013.

As these procedures and policies are completed and implemented, I will provide continuing updates to you to close out each finding.

Please let me know if anything further is required at this time.

Respectfully,

Tracy A. Pierce, Ph.D.
Vice President Student Services
Florida State College at Jacksonville
501 W. State St.
Jacksonville, FL 32202
(904) 632-5048

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

 FLORIDA STATE COLLEGE at Jacksonville	ADMINISTRATIVE PROCEDURE MANUAL		
	SECTION TITLE	NUMBER	PAGE
	FINANCIAL AID – SATISFACTORY ACADEMIC PROGRESS	10-0606	1 OF 5
	BASED ON BOARD OF TRUSTEES' RULE AND TITLE	DATE ADOPTED	
6Hx7-10.6 Student Standards of Academic Progress	June 12, 2012		

PURPOSE

In accordance with U.S. Department of Education regulations, schools are required to assess the academic progress of eligible students receiving Title IV funds. The purpose of Section I is to define terminology as outlined in the federal regulations. These regulations are effective for all financial aid students beginning July 1, 2011. The purpose of Section II is to define procedures for monitoring the satisfactory academic progress (SAP) of financial aid students. The purpose of Section III is to establish procedures for students who are not meeting these standards and who have extenuating circumstances to file an appeal and apply to have their eligibility reinstated.

Section I. Definition of Terms.

Financial aid probation is defined as a status assigned by an institution to a student who fails to make satisfactory academic progress and who has appealed and has had eligibility for aid reinstated.

Financial aid warning is defined as a status assigned to a student who fails to make satisfactory academic progress at an institution that evaluates academic progress at the end of each payment period. This status may be conferred to the student automatically without any action taken by the student. Students on financial aid warning may continue to receive assistance under the Title IV, HEA programs for one payment period despite a determination that the student is not making satisfactory academic progress.

Satisfactory Academic Progress Appeal is defined as a process by which a student who is not meeting the institution's standards petitions the institution for reconsideration of the student's eligibility for Title IV, HEA program funds.

The definition of *Extenuating Circumstances* includes:

- A. Death in the immediate family.
- B. Medical conditions such as a family member needing round-the-clock care by the student.
- C. Extended illness of student or immediate family.
- D. Military duty.
- E. Other documented extenuating circumstances beyond the control of the student.

PROCEDURE

Section II. Satisfactory Academic Progress.

Students must maintain satisfactory academic progress (SAP) to retain eligibility for Title IV funds. SAP requirements must be applied consistently for all Title IV eligible students. Procedures for monitoring academic progress are as follows:

1. All academic history is included when reviewing a student's SAP status whether or not Title IV funds were received during the period of enrollment.



ADMINISTRATIVE PROCEDURE MANUAL

SECTION TITLE	NUMBER	PAGE
FINANCIAL AID – SATISFACTORY ACADEMIC PROGRESS	10-0606	2 OF 5
BASED ON BOARD OF TRUSTEES' RULE AND TITLE	DATE ADOPTED	
6Hx7-10.6 Student Standards of Academic Progress	June 12, 2012	

2. Thirty (30) hours of remedial coursework, ~~and all English for speakers of other languages~~ Academic Purposes (ESLEAP) courses, non-academic military courses and apprenticeship courses are excluded from the calculation. Remedial courses are included in the GPA calculation. ~~maximum timeframe (150%) calculation.~~
3. Each student's progress will be evaluated each term. Students in clock hour programs will have their SAP evaluated when the student successfully completes the scheduled clock hours for each payment period.
4. Students will be allowed a financial aid warning period of one term, unless the student is exceeding maximum timeframe. During this term students will maintain financial aid eligibility even though they are not currently meeting SAP standards. Students on financial aid warning will not be awarded aid for subsequent terms until academic progress is in compliance or an approved appeal is processed. Students exceeding maximum timeframe are not given a warning term.
5. When evaluating SAP, all attempted transfer hours will be included. However, transfer hours attributed to the completion of a previous degree may be excluded from the SAP calculation.
6. The College will monitor quantitative and qualitative criteria to determine satisfactory academic progress. Students are deemed "meeting SAP standards" if they are in compliance with criteria listed below:
 - A. To meet quantitative SAP standards students must successfully complete 67% of all courses attempted and must not attempt more than 150% of the coursework required to complete their degree or certificate program.
 - B. Quantitative SAP standards for clock hour programs will be measured by limiting students to no more than 150% of the clock hours and weeks of instructional time required to complete the program. Only hours and weeks that apply to the student's current program of study will be included in the SAP calculation.
 - C. To meet qualitative SAP standards students must maintain a cumulative GPA of 2.0 or better.
7. If a student who was previously not meeting SAP criteria brings his/her academic progress back into compliance prior to the next time SAP is calculated, no appeal is required. The student's eligibility for financial aid will be automatically reinstated. Students who are not meeting SAP criteria and who are not eligible for a financial aid warning period are no longer eligible for financial aid. Students no longer eligible for financial aid with documented extenuating circumstances may submit an appeal to have their aid reinstated. If the appeal is approved, the student may have financial aid reinstated for the current or subsequent term and will be considered



ADMINISTRATIVE PROCEDURE MANUAL

SECTION TITLE	NUMBER	PAGE
FINANCIAL AID – SATISFACTORY ACADEMIC PROGRESS	10-0606	3 OF 5
BASED ON BOARD OF TRUSTEES' RULE AND TITLE	DATE ADOPTED	
6Hx7-10.6 Student Standards of Academic Progress	June 12, 2012	

to be on financial aid probation. Appeals are approved for one term only and cannot be approved retroactively.

8. To ensure compliance with federal regulations and college policy, the Director of Financial Aid will monitor campus appeals as needed.

Section III. Appeal Process.

1. Students in associate degree programs are not eligible for an approved appeal if they have the equivalent of two associate degrees ~~or attempted more than the equivalent of 180 credit hours.~~ Bachelor degree students are not eligible for an approved appeal if they have attempted over 240 credit hours ~~earned the equivalent of two bachelor's degrees.~~ Once a student has reached these limits, no appeal will be approved regardless of the extenuating circumstances.
2. Appeal forms are available to students online via the financial aid website and through Connections. Students must complete the appeal application and submit the completed packet to the campus financial aid office. All appeals must be approved or denied by the Campus Dean of Student Success ~~by the associate director of financial aid.~~ The Dean's ~~associate director's~~ decision will be posted in Connections within 45 days upon receipt of the appeal. ~~Decisions made by the Dean are is~~ final and may not be appealed by the student.
3. Incomplete appeal applications will not be reviewed. An appeal application is considered incomplete if any requested information is omitted, the appeal form is not filled out completely or supporting documentation is not attached. Supporting documentation must be appropriate for the extenuating circumstance; e.g., death certificate for death in family, physician's note for illnesses or hospitalization, military orders, etc.
4. During the appeal review process, a student's record of academic progress must also be reviewed for maximum timeframe violations. If at the time of the review, it is determined the student will be unable to complete his/her program of study without exceeding the maximum timeframe, the appeal will be denied.
5. Students whose appeals are approved will be approved for one term only with the stipulation that they must successfully complete all courses attempted. They may also receive additional stipulations such as limitations on the number of allowed hours of enrollment.
6. All students are required to meet with an academic advisor to complete an academic plan to submit with the appeal. ~~Students are required to submit an academic plan with written approval from an academic advisor with all SAP appeals submitted after a term of academic probation. Academic plans are available within the forms section of the financial aid website. SAP appeals that do not include an academic plan will not be processed. The academic plan includes:~~



ADMINISTRATIVE PROCEDURE MANUAL

SECTION TITLE	NUMBER	PAGE
FINANCIAL AID – SATISFACTORY ACADEMIC PROGRESS	10-0606	4 OF 5
BASED ON BOARD OF TRUSTEES' RULE AND TITLE	DATE ADOPTED	
6Hx7-10.6 Student Standards of Academic Progress	June 12, 2012	

- A. A degree audit which lists all courses required for completion of the student's program of study. The student should log on to Connections to print his/her degree audit to review with an academic advisor.
- B. A timeline of what courses will be taken each term for the next three enrollment periods.
- C. An estimated date of graduation.
- D. An estimated date at which the student will attain a clear SAP status.
- E. A signature from the student acknowledging she/he understands that continued financial aid eligibility is contingent upon adherence to the academic plan and appeal guidelines.

Students must not deviate from the academic plan without prior written approval from an academic advisor.

- ~~7. Provided a student is making positive progress towards program completion, an appeal based on completion rate or GPA may be approved for one term and can be continued (extended) for a maximum of four consecutive terms. This excludes students violating 150% maximum timeframe. The reason for the continuation of the approved appeal must be documented and meet the criteria of extenuating circumstances defined above.~~
8. An appeal may only be approved for courses that count towards the student's current program of study.
9. Student appeals must include, in the student's own words, why they are not meeting SAP standards and what has changed that will enable them to successfully complete all courses attempted going forward.
10. If a student was on an approved appeal and subsequently does not complete a course, the student's appeal cannot be approved again unless extenuating circumstances as previously defined, were present that were not a factor in the previous appeal such as a death in the immediate family or a catastrophic illness. Appropriate documentation must be submitted with the appeal request to be considered.
11. If one campus has denied the appeal another campus cannot approve it. The student must submit any applicable documentation of additional extenuating circumstances to the campus that originally denied the appeal.
12. Appeals cannot be made retroactively. An appeal may only be approved for the term in which it was received or for future terms.



ADMINISTRATIVE PROCEDURE MANUAL

SECTION TITLE	NUMBER	PAGE
FINANCIAL AID – SATISFACTORY ACADEMIC PROGRESS	10-0606	5 OF 5
BASED ON BOARD OF TRUSTEES' RULE AND TITLE	DATE ADOPTED	
6Hx7-10.6 Student Standards of Academic Progress	June 12, 2012	

~~13. If an appeal is denied, the student cannot resubmit the appeal until he/she has successfully completed at least one academic semester/mini-session with the equivalent of 6 credit hours and earned a term GPA of 2.0 or higher.~~

~~14.13. An appeal may also be approved for a student that does not currently have an extenuating circumstance provided he or she previously met one of the definitions of extenuating circumstances listed above. The student must have the equivalent of 12 hours or less remaining to complete their primary program of study and the student must have a cumulative 2.0 GPA or higher. The student must produce documentation of the previous extenuating circumstances and show that he or she has taken action to resolve the prior circumstances and must be scheduled to graduate in two terms or less.~~

~~15.14. An appeal may be approved for a student pursuing a second degree or certificate provided:~~

- ~~A. The student explains why s/he is pursuing a second degree or certificate.~~
- ~~B. The student successfully completed a previous degree or certificate.~~
- ~~C. The student meets maximum timeframe requirements once the hours earned to complete the previous degree are excluded.~~

Students who attempted other degree or certificate programs, but did not complete them, are not eligible for this appeal provision.

15. A student who has not pursued coursework at the College or any other institution for 5 full years may have an appeal approved without extenuating circumstances under the following conditions.

- A. All previous grades older than 5 years will be omitted from all SAP standards (quantitative and qualitative)
- B. The appeal will be approved each term the student makes successful grades.
- C. If the student earns any unsuccessful grade the approved appeal will be revoked.

Special Appeal Provision

~~16. A student that does not meet the definition of extenuating circumstances currently may have his or her appeal approved provided they meet specific criteria as follows:~~

- ~~A. The student has not been enrolled in a postsecondary institution for three years or more.~~



ADMINISTRATIVE PROCEDURE MANUAL

SECTION TITLE	NUMBER	PAGE
FINANCIAL AID – SATISFACTORY ACADEMIC PROGRESS	10-0606	6 OF 5
BASED ON BOARD OF TRUSTEES' RULE AND TITLE		DATE ADOPTED
6Hx7-10.6 Student Standards of Academic Progress		June 12, 2012

- B. ~~→ The student is not in violation of maximum time frame (150% rule).~~
- C. ~~→ The student must explain what led to their previous unsatisfactory academic progress and how the factors that led to this unsatisfactory progress have been overcome. The student must provide documentation that supports his or her claim that they are prepared to perform satisfactorily in an academic environment. Ex: letter from current employer or other third party, such as a counselor, on letterhead. Letters from relatives will not be accepted.~~
- D. ~~→ The unsatisfactory academic progress must have occurred during his or her first attempt at college-level coursework.~~
- E. ~~→ The student must not have attempted more than the equivalent of 30 credit hours.~~
- F. ~~→ The student must prepare and submit an approved academic plan as in item 6 above.~~

~~Adopted Date: April 5, 2011~~
~~Revision Date: June 12, 2012~~

ADMINISTRATIVE PROCEDURE MANUAL			
	SECTION TITLE	NUMBER	PAGE
		Institutional Withdrawal Procedure	NEW
BASED ON BOARD OF TRUSTEES' RULE AND TITLE		DATE ADOPTED	
	6Hx7-11.1 Student Rights and Responsibilities	February 2013	

Purpose:

The purpose of this APM is to describe the procedure a student will follow to officially withdraw from the institution. Withdrawal from the institution constitutes a student-initiated revocation of admission status. This procedure will be published in the student handbook and the College Catalog.

Procedure

- I. There are three procedures a student may follow to withdraw from the institution.
 - a. Official institutional withdrawal: Student initiated online process, resulting in institutionally applied "W" grades for all courses in which the student is currently enrolled.
 - i. To withdraw under this procedure, the student should log on to his or her Connections account,
 - ii. click the "Records" tab
 - iii. select Institutional Withdrawal from the menu and follow the steps through Withdrawal confirmation
 - b. Withdrawal by academic performance: Receiving all "FN" grades or all "W" grades or a combination of FNs and Ws for all courses attempted during a term. Reference the grading APM 10-0602 for the College's complete grading policy.
 - i. Per APM 10-0602 instructors assign the FN grade when a student is failing due to not attending the class.
 - ii. At the time and FN grade is assigned, instructors record the last date of attendance.
 - iii. The F grade is used to signify the student's regular attendance and participation in a class and does not signal institutional withdrawal.
 - iv. Students withdrawing from individual courses should follow the course withdrawal process in Connections.
 - c. Withdrawal by non-enrollment: Allowing a three semesters to pass without enrollment in a course.
 - i. This is an automatic institutional withdrawal that occurs when the student does not register. No further procedure is necessary.
- II. For the purposes of determining financial aid eligibility, the last date of attendance will be determined as the later of either the date the student officially withdraws from the institution, the date the student withdraws from a class, or the last date of attendance recorded by a faculty member issuing an FN grade. In the case of multiple dates, the latest date of academic participation recorded will be used.

ADMINISTRATIVE PROCEDURE MANUAL			
	SECTION TITLE	NUMBER	PAGE
		Institutional Withdrawal Procedure	NEW
BASED ON BOARD OF TRUSTEES' RULE AND TITLE		DATE ADOPTED	
	6Hx7-11.1 Student Rights and Responsibilities	February 2013	

III. In all forms of institutional withdrawal, the student must complete the re-admission process.

- a. The readmission process will require the student to re-establish residency for tuition purposes.
- b. Students seeking readmission to the College must meet with an advisor prior to course registration to validate primary program of study, develop an academic plan, and identify strategies to support the student's academic success.

IV. In the cases of official institutional withdrawal or withdrawal by academic performance, the following procedures will be initiated.

- a. The Office of Student Records and Registrar will notify the Office of Financial of the Student's withdrawal.
- b. The Office of Financial Aid will calculate the student's responsibility to return any form of financial aid according to federal, state, institutional or other applicable regulations.
- c. If a student withdraws or stops attending ALL their classes, they may be responsible for a portion of the charges they've incurred, which is calculated based on the last date of attendance reported for them by their instructors.

Title IV funding must be returned to the federal programs in the following order:

- Unsubsidized Stafford Loan
- Subsidized Stafford Loan
- PLUS Loan
- Pell Grant
- Supplemental Education Opportunity Grant (SEOG)

Once a student has completed more than 60% of the enrollment period, the student has earned the aid they've already received.

	ADMINISTRATIVE PROCEDURE MANUAL		
	SECTION TITLE	NUMBER	PAGE
	Institutional Withdrawal Procedure	NEW	3 OF 2
	BASED ON BOARD OF TRUSTEES' RULE AND TITLE	DATE ADOPTED	
6Hx7-11.1 Student Rights and Responsibilities	February 2013		

Examples of Return of Title IV Funds (R2T4) Calculations

- | Student Withdraws Before Completing 60% of Semester | Student Withdraws After Completing 60% of Semester |
|---|---|
| <ul style="list-style-type: none"> • Enrolled in fall term 8/27/12 thru 12/14/12 • Registered 12 credits • Stop Attending ALL classes 10/25/12 | <ul style="list-style-type: none"> • Enrolled in fall term 8/27/12 thru 12/4/12 • Registered 12 credits • Complete full term |

BEFORE R2T4 CALCULATION:		
Tuition Charges on Account	\$1485.00	\$1485.00
Pell Grant Received	(\$2775)	(\$2775)
Direct Loans Received	(\$5198)	(\$5198)
Total Financial Aid Received	(\$7973)	(\$7973)
Refund to Student	\$6488	\$6488
Balance Before R2T4 Processed	\$0	\$0
AFTER R2T4 CALCULATION:		
Aid Earned	54.5% (7973 x 54.5% = 4345.29)	100%
Aid Unearned	45.5% (7973 - 4345.29 = 3627.71)	0%
Amount of Aid Not Earned	\$2952.03 (3627.71 - 675.68)	\$0
Amount of Charges	\$675.68 (1485 x 45.5%)	\$0

	ADMINISTRATIVE PROCEDURE MANUAL		
	SECTION TITLE	NUMBER	PAGE
	Institutional Withdrawal Procedure	NEW	4 OF 2
	BASED ON BOARD OF TRUSTEES' RULE AND TITLE	DATE ADOPTED	
	6Hx7-11.1 Student Rights and Responsibilities	February 2013	

Not Earned		
Amount of Aid Not Earned Due From School	\$675.68	\$0
Returned to Direct Loan Program	\$675.68	\$0
Returned to Pell Grant Program	\$0	\$0
<hr/>		
Student Owes After R2T4 Calculation	\$675.68	\$0

FINANCIAL AID COD REPORTING PROCEDURE

COD Reporting Procedure

Purpose:

The purpose of this procedure is to describe the process used by the College to transmit disbursement data to COD and to ensure that disbursement dates match dates funds are posted to student accounts.

1. When a student's award file is complete, the student's disbursement record is submitted in a batch processing job. This batch processing job is run by IT data operations twice weekly in Financier.
2. The batch processing job in financier creates a disbursement file.
3. Following the batch processing job and on the same day, the office of finance (student accounts) will run a report to access the disbursement file and apply awards to student accounts in the student finance system.
4. An export file is created from the disbursement record and submitted to COD.
5. Following this procedure, the dates in Financier, in student accounts and COD will match.

Appendix D

Department Program to FSCJ Response



Appendix D

03/29/2013

Dr. Judith Bilsky
Provost and Acting College President
Florida State College at Jacksonville
501 West State Street
Jacksonville, Florida 32202-4030

UPS Tracking Number
1ZA5467Y0195414137

RE: Program Review Response
OPE ID: 00148400
PRCN: 201240428075

Dear Dr. Bilsky:

The School Participation Division - Atlanta has reviewed Florida State College at Jacksonville's (FSCJ) January 8, 2013 response to the November 7, 2012 Program Review Report issued by the U.S. Department of Education (Department). The Department's response to the response issue by FSCJ is enclosed. Each student mentioned in Finding 1 of the Program Review Report is discussed.

Finding 1: Title IV Aid Disbursed for Coursework Not Required for Degree/Certificate

Page 3 of Volume 1, Chapter 1 of the 2011-2012 Student Aid Handbook states, "A person must be enrolled as a regular student in an eligible program in order to receive FSA funds."

Page 4 of Volume 1, Chapter 1 of the 2011-2012 Student Aid Handbook states, "Remedial coursework prepares a student for study at the postsecondary level (**compare with preparatory coursework, which prepares a student for a given program**), and a student enrolled solely in a remedial program is not considered to be in an eligible program. **If acceptance into an eligible program is contingent on completing remedial work, a student cannot be considered enrolled in that program until she completes the remedial work.**"

Page 69 of Volume 1, Chapter 6 of the 2011-2012 Student Aid Handbook states, "A student may apply for a Stafford or PLUS loan for coursework the school has documented is necessary for him to enroll in an eligible program. The courses must be part of an eligible program otherwise offered by the school, though the student does not have to be in that program. If enrolled at least half time in these prerequisite courses, he is eligible for loans for one consecutive 12-month period (not per program) beginning on the first day of the loan period. If the period of preparatory courses spans more than one academic year, the student may receive multiple loans.

Federal Student Aid

AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

School Participation Division – Atlanta
61 Forsyth Street Room 18T40
Atlanta, Georgia 30303-8918
www.FederalStudentAid.gov

To be eligible for loans under this exception, the student must be taking classes that are a prerequisite for admission. If he is only taking them to raise his GPA in order to be admitted, he would not qualify.”

Student 1:

FWSCJ’s response for this student stated, “As noted in the comment log, the student met with an advisor (Sharon Hoose) on August 31, 2010 for the first term advising. As a result of this meeting, the advisor added Nursing R.N. (objective 2149 – a limited access program) as the student’s program of study (POS). There is no asterisk next to the nursing objective because the POS was not indicated on the student’s application; however, the change does reflect the student’s intent as it was the result of the first term advising session.”

“The student went through the auto POS program on October 15, 2010. Because the student was not accepted into the nursing program, the auto POS program changed the student’s primary POS from Nursing R.N. to Associate in Arts (objective code 1108). However, as noted above, the courses the student was enrolled in were required for the Nursing R.N. program. Because the courses are required for most, if not all majors, they also met the requirements for the Associate in Arts POS – FSCJ’s general degree program. Accordingly, all of the classes were financial aid eligible regardless of whether the student’s POS was Nursing R.N. or Associate in Arts.”

Student 1 was required to enroll in prerequisite coursework prior to being admitted into the R.N. Nursing Program (program of intent). The auto POS adjustment adding the Associate of Arts Program did not qualify the student for Title IV aid. The student did not initiate a change in degree or intend to enroll in the Associate of Arts Program. The Associate of Arts Program was added by the auto POS system.

Per the 2011-2012 Student Aid Handbook, the student was not eligible for aid until she was admitted and enrolled as a regular student in an eligible program (R.N. Nursing). In addition, the student only received Pell Grant funds, thus the exception for loan eligibility does not apply.

The full liability for this student is as follows:

Student Number	Fall 2010	Spring 2011	Total
1	\$2,775.00 – Pell	\$1,850.00 - Pell	\$4,625.00

Instructions for repayment of any liabilities will be provided in the Final Program Review Determination Letter.

Student 3:

There is evidence in the documentation included in FSJC’s response to verify that the student was working on a double major (Health Information Management and Associate of Arts). The primary documentation attesting to the student’s intent to pursue a double major is a note in the advising log on 11/1/2010, the Program Objective Change Form submitted on 4/11/2012, and an

award of an Associate of Arts Degree in December of 2011. Ideally, the student's records should have clear documentation that the student was simultaneously enrolled in two degree programs (Health Information Management and Associate of Arts). In FSCJ's response, it is stated that the ORION system does not allow for students to have more than one primary objective selected at a time.

The Department recommends that the institution take extra steps to insure that any/all students pursuing a double major are well documented and clear to an outside auditor.

The Department concurs with FSCJ's response regarding this student.

Student 5:

There is evidence in the documentation included in FSCJ's response to verify that the student was pursuing the Associate of Arts Program (objective code 1108) with a transfer major in Business Administration (objective code 202). The primary documentation attesting to the programs of study are the comment in the advisement log on 7/6/2011 and the awarding of the Associates in Arts Degree on 12/16/2011.

There is evidence in the documentation included in FSCJ's response to verify that the student was advised to submit a Program Objective Change Form for the Associates in Business Administration Program (objective code 2213). The student's documentation, however, does not include a Program Objective Change Form for the A.S. in Business Administration Program. The student's documentation does include a Bachelor's Degree Application for Student Membership for the B.A.S. in Business Administration Program (objective code T200) effective summer 2012. The auto POS assignment for the Associates in Business Administration Program was added on January 5, 2012 to facilitate financial aid eligibility for the B.A.S. in Business Administration prerequisite coursework (MAN2012 and FIN2000) taken during the spring 2012 semester.

The comment on 1/5/2012 attests to the advisor requesting a POS for the Associate in Business Administration Program. The comment states, "student does not have an active POS for 20122 (spring 2012), so student will submit a POS change form and then check financial aid status." The POS change form for the Associates in Business Administration Program was not included in the student's file. The statement demonstrates that the advisor was the driver behind the POS change. In addition, the comment demonstrates that the change was added to facilitate financial aid eligibility for the two prerequisites courses required for entry into the B.A.S. in Business Administration Program. As such, the student was not eligible for Title IV aid for the spring 2012 semester (20122).

The student was awarded Pell Grant and Direct Loan funds for the spring 2012 semester (20122). The provision mentioned earlier allows the student to receive Direct Loan funds for coursework the school has documented is necessary for him to enroll in an eligible program.

The liability for the student is as follows:

Student Number	Spring 2012	Total
5	\$ 975.00 – Pell	\$ 975.00

Instructions for repayment of any liabilities will be provided in the Final Program Review Determination Letter.

Student 9:

FWSCJ's response for this student stated, "The student completed a web application for college credit on July 1, 2010 indicating Nursing R.N. as her primary POS. Subsequently, on August 27, 2010, the student completed a paper application. The paper application indicated a general degree (student checked the college degree circle and did not indicate a major). As noted above, FSCJ's general degree is the Associate in Arts (objective code 1108).

Although the application is stamped "ENTERED" indicating that the information had been entered into the ORION system, an error was made and the application information was never actually entered into the system. Accordingly, the student's intended POS was never added/updated on the system. On February 25, 2011 the student was run through the auto POS program which updated the student's primary POS to the Associate in the Arts degree."

Documentation collected during the review included a Membership Application Report. This report included the major code 2149 (Nursing R.N.) under the Educational Plans Section. In addition, per the FSCJ's response, the auto POS system did not update the student's records with the Associate of Arts Program (objective code 1108) until 2/25/2011.

The documentation and response did not provide sufficient evidence to verify that the Associate of Arts Program was the student's program of intent. In addition, the POS system did not update the student to the Associate of Arts Program until 2/25/2011. Even with proper documentation, the student was assigned to the Nursing R.N. program from the initial start date until 2/25/2011. The student's enrollment spanned the fall 2010 and spring 2011 semesters. The spring 2011 semester began prior to the POS assignment of the Associate in Arts Program.

As such, the student was pursuing the R.N. Nursing Program and had not met the requirements for admission. The coursework taken during the fall 2010 and spring 2011 semesters was not eligible for Title IV aid. The auto POS adjustment (objective 1108) is irrelevant as the student did not initiate a change (Program Objective Change Form) to enroll in the Associate of Arts Program (1108) and the change was not initiated prior to the student's enrollment in the fall 2010 and spring 2011 semesters.

The argument presented by FSCJ regarding the checkmark next to the general degree on the Application for Student Membership does not justify an automatic assignment to the Associate of Arts Program. There is a space on the application to list a major. The space was blank. As such, the only clear indicator of student program intent was the web application completed on July 1, 2010 (Nursing R.N.).

Per the 2011-2012 Federal Student Aid Handbook, the student was not eligible for aid until she was admitted and enrolled as a regular student in an eligible program (R.N. Nursing). The automatic assignment of The Associate of Arts Program does not mirror student intent. On the date of the auto POS adjustment (2/25/2011 – Associate of Arts), the effective term was backdated to the summer of 2010 (20103). This action was done to facilitate financial aid eligibility.

The student only received Pell Grant funds, thus the exception for loan eligibility does not apply.

The full liability for this student is as follows:

Student Number	Fall 2010	Spring 2011	Total
9	\$2,775.00 - Pell	\$1,387.00 – Pell	\$4,162.00

Instructions for repayment of any liabilities will be provided in the Final Program Review Determination Letter.

Student 19:

FWSCJ's response for this student stated, "The student submitted a Change Form through the Department of Veterans Affairs in August 2010 to be effective for the fall 2010 term. On the form the student requested a change to the Associate in Arts POS. The request was effectuated by an advisor (Susan Brown) and noted in the comment log for the student. Accordingly, despite the lack of an asterisk next to the Associate in Arts objective code (1108), because the student clearly initiated the POS change to Associate in Arts, the change demonstrates the student's intent."

The Department of Veterans Affairs Request for Change of Program or Place of Training form was not provided to the reviewers during the program review. Upon review, this form is sufficient to demonstrate that the student requested a POS change to the Associate of Arts Program effective fall 2010 semester.

Upon further review of the ORION Select Maintain Student Program Objective Screens, the student was admitted to the ATD Pharmacy Technician Program (B300) effective the spring 2011 semester (20112). The unofficial transcript demonstrates that the student was taking coursework in the ATD Pharmacy Technician Program (B300) during the spring 2010 and summer 2010 semesters. This enrollment was prior to the students admit date into the Pharmacy Technician Program.

Per the Orion Maintain Student Objective Screen, the student was admitted into the Engineering Technology Program effective the fall 2009 semester. As such, coursework taken during the spring 2010 and summer 2010 semester that counts toward the Engineering Technology Program would be eligible for Title IV aid. Coursework that only counts toward the ATD Pharmacy Technician Program that was taken during the spring 2010 and summer 2010 semesters would not be eligible for Title IV aid.

The following coursework taken during the spring 2010 semester only counts toward the Pharmacy Technician Program and is not eligible for Title IV aid:

Human Biology (BSC2020C)
 Medical Terminology for Health Professionals (HSC1531)
 Introduction to Information Technology (CGS1060)

The student was not eligible to receive title IV aid during the spring 2010 semester.
 The full liability for this student is as follows:

Student Number	Spring 2010	Total
19	\$1,338.00 - Pell	\$1,338.00

Instructions for repayment of any liabilities will be provided in the Final Program Review Determination Letter.

Student 22:

FSCJ's response for this student stated, "Although the student had taken a prior math class (MAT1103), the Associate in Science Degree requires MGF1106 or higher to fulfill the math requirement. Accordingly, the prior math class would not meet the requirement.

Accordingly, regardless of the change made by the auto POS program, both classes taken during the term in question counted toward the student's intended major (Digital Media/Multimedia Technology). As such, the MGF1106 class can be used in the enrollment status calculation and this student should not be in the list of affected students."

The Department agrees that the MGF1106 course is counted toward completion of the Associate of Science in Digital Media/Multimedia Technology. The prior mathematics course (MAT1033) did not satisfy the programs general education requirement.

The reviewer notes, however, that there appears to be no reason to have added the Associate of Arts Program (1108) to this student's records (auto POS). All coursework taken from the fall semester of 2010 to the summer semester of 2012 was included in the Digital Media/Multimedia Technology Program. The student's unofficial transcript rotates between the two programs. The summer and fall semesters of 2011 list the student enrolled in the Associate of Arts Program. As such, an individual reviewing the transcript is led to believe that the student should have been enrolled in coursework in the Associate of Arts Program during the summer and fall 2011 semesters.

In addition, additional programs should not be added without the student's intent (auto POS). There is no documentation supporting the student's intent to enroll in the Associate of Arts Program..

The Department concurs with FSCJ's response regarding this student.

Student 24:

FSCJ concurred with the Department's finding regarding this student. The student indicated her intent to enroll in the Nursing R.N. Program (objective code 2149) per the ARTEMIS My Advisor screen (Advising POS entered on 7/19/2010). The ORION Student Program Objective Screen indicates that the student was not accepted into the R.N. Nursing program. The lack of acceptance was due to the student not having the required prerequisites. The auto POS system added the Associate of Arts Program (objective 1108) on 9/23/2011 with an effective term of 20111 (fall 2010).

The unofficial transcripts lists coursework attempted from the fall 2010 semester (20111) through the spring 2012 semester (20122). The coursework attempted includes several of the prerequisites to the Nursing R.N. Program. The other coursework includes general education and professional courses that are required for the Nursing R.N. Program.

As the student was not accepted into the Nursing R.N program, during each of the before mentioned terms, all coursework attempted was not eligible for Title IV aid.

The student was contacted by telephone on 10/23/2012. The student confirmed that she never intended to enroll in the Associate of Arts Program and that she was advised that she needed to take several prerequisites prior to being admitted into the Nursing R.N. program.

The original program Review report only listed the prerequisite courses as ineligible to receive Title IV aid. Upon further review, the Department has determined that all coursework taken from the fall 2010 semester (20111) through the spring 2012 semester (20122) was not eligible for Title IV aid.

Per the 2010-2011 Federal Student Aid Handbook, the student was not eligible for aid until she was admitted and enrolled as a regular student in an eligible program (R.N. Nursing). In addition, the student only received Pell Grant funds, thus the exception for loan eligibility does not apply.

Student Number	Fall 2010	Spring 2011	Fall 2011	Spring 2012	Total
24	\$ 575.00 - Pell	\$ 862.00 - Pell	\$ 375.00 - Pell	\$ 375.00 - Pell	\$2,187.00

Instructions for repayment of any liabilities will be provided in the Final Program Review Determination Letter.

Student 27:

FSCJ's response for this student stated, "That summer, the student had a number of conversations with various advisors. Through those conversations, her primary and transfer POS were updated. On June 21, 2011 her POS was updated to Associate of Arts (objective code 1108) by another advisor (Barbara Jackson)."

The Membership Application report and ARTEMIS My Advisor screen clearly indicate that the student originally enrolled in the Digital Media/Multimedia Technology Program (objective code 2152). On July 13, 2011 the student completed another application for the Bachelor of Science in Early Childhood Education Degree (objective code T100). The student was only enrolled one semester (fall 2011). At no time did the student indicate intent to enroll in the Associate of Arts Program (objective code 1108). The Associate of Arts program was added by an advisor based on the student's course selection for the fall 2011 term.

The student enrolled in SLS1103 – Strategies/Success in College. This course is not counted in the requirements for the Bachelor of Science in Early Education Degree. As such, it is not eligible for Title IV aid. The student was paid a three quarter time Pell Grant. The student was eligible for a half time Pell Grant. The student only received Pell Grant funds, thus the exception for loan eligibility does not apply.

The full liability for this student is as follows:

Student Number	Fall 2011	Total
27	\$ 400.00	\$ 400.00

Instructions for repayment of any liabilities will be provided in the Final Program Review Determination Letter.

In the interest of brevity, please note that the Department limited the number of students included in Finding 1 in the Program Review Report drafted on November 7, 2012. The Department did not include all instances of Title IV Aid Disbursed for Coursework Not Required for Degree/Certificate discovered during the file review process. In addition, the Department has received comprehensive information from a former FSCJ employee documenting the intent and scope of the POS automated system.

As a result of the before mentioned review, additional instances within the sample, and internal evidence submitted by a former FSCJ employee, FSCJ must conduct a 100% file review of all Title IV recipients who had a primary program of study populated by the auto POS system that did not reflect the student's program of intent. Internal documentation indicates that the auto POS system was initiated in the fall 2007 semester and discontinued after the summer 2012 semester. The Department's samples were limited to the 2010-2011 award year and the 2011-2012 award year. As such, the file review will be limited to all students enrolled in the 2010-2011 through 2011-2012 academic years.

FSCJ must report all coursework that was not required for the student's program of intent and was included in determining Title IV eligibility. This coursework includes learning support and prerequisite coursework. An example of this would include a A.S. in Nursing student who was required to complete both learning support and prerequisite courses prior to admittance into the Nursing program. These reporting requirements must be included as part of FSCJ's response to this Program Review Report. The results of this review must be provided in Excel or a similar spreadsheet format (separated by award year) and contain the following fields:

1. Student's Name
2. Student's SSN
3. Program of Intent
4. Automatic POS System Program Entry or Manual Advisor Program Entry (No Student Intent)
5. Terms of Enrollment
6. Ineligible Coursework By Term
7. Ineligible Title IV Aid by Term – Pell
8. Ineligible Title IV Aid by Term – SEOG
9. Ineligible Title IV Aid by Term - FWS

In lieu of performing a file review for the entire population of Title IV recipients who had a program of study populated by the auto POS system or advisor that did not reflect the student's program of intent, FSCJ has the option of performing this file review for only the remainder of the statistical sample not identified by the Department in the Program Review Report (includes remainder of sample). The results from this file review using the statistical sample will be used to project liabilities for the entire population (i.e., the average liability for the recipients in the statistical sample will be multiplied by the entire population). This option is intended to reduce the burden on the institution of conducting a full file review.

If FSCJ wishes to select this option, the Department will forward statistical sample listings for award years 2011 and 2012. File reviews must be performed for all students on each statistical sample listing except those included in Finding 1 of this Program Review Report for the respective award years. In addition, FSCJ must review the students from the original sample that were not included in this response.

If FSCJ elects to do the full file review, it is recommended that FSCJ first review the remainder of students in the statistical sample. At that point, FSCJ may decide to accept a liability projection instead of continuing with a full file review.

Please send the file review summary reports (spreadsheets) to Jon Finkelstein by e-mail at jon.finkelstein@ed.gov. See the enclosure – protection of Personally Identifiable Information (PII) for instructions regarding electronic submissions to the Department for data containing PII. Please present a separate e-mail with an access password to Jon Finkelstein.

Instructions for repayment of any liabilities will be provided in the Final Program Review Determination Letter.

Please see the enclosure Protection of Personally Identifiable Information (PII) for instructions regarding submission of required data / documents containing PII.

The resubmission of FSCJ's response to these findings must be sent directly to Jon Finkelstein of this office within 60 calendar days of the date of this letter. If this corrected response is not received by that date, a Final Program Review Determination may be issued based upon information received by that date.

Florida State College at Jacksonville

00148400

Page 10

If you have any questions concerning this report, please call me at 404-794-4510.

Sincerely,

Jon Finkelstein
Institutional Review Specialist

cc: Ms. Michele Bowles, Financial Aid Administrator

Enclosures:
Protection of Personally Identifiable Information

Appendix E

Projected Pell Grant, Academic Competitiveness Grant (ACG) and Federal Supplemental Opportunity Grant (FSEOG)

Appendix E

The Department projected Pell Grant liabilities based on the results of a review of a valid statistical sample(s) generated by the Department. An average liability was calculated for the statistical sample(s) for each Title IV, HEA program with liabilities and this average was multiplied against the population being reviewed. The following charts demonstrate how the liability was calculated.

Program Award Year	Pell Grant – 2010/2011	Academic Competitiveness Grant (ACG) – 2010/2011	Pell Grant – 2011/2012	Federal Supplemental Opportunity Grant (FSEOG) 2011/2012
Statistical Sample Size	376	376	377	377
Total Liability in Statistical Sample	\$ 38,651.00	\$ 725.00	\$ 24,738.00	\$ 800.00
Average Liability for Statistical Sample	\$ 102.80	\$ 1.93	\$ 65.62	\$ 2.12
Total Target Population	17900	17900	21040	21040
Total Projected Liability	\$1,840,120.00	\$ 34,547.00	\$1,380,644.80	\$ 44,646.88

Appendix F

Estimated Loss (Direct Loan) Description

Page 1 of 1

Appendix F

The Estimated Actual Loss Formula (EALF) is used for only certain types of findings on ineligible FFEL and Direct Loan liabilities. The EALF estimates (1) the principal amount that has or will default; and (2) the interest and special allowance on the entire ineligible loan amount.

The EALF uses an institution's applicable cohort default rate (CDR) to estimate the amount of defaults from the ineligible principal amount. This is usually the institution's latest published CDR. Draft CDRs are not used unless there is no prior CDR.

Example:

Ineligible Principal Loan Amount	\$100,000
Cohort Default Rate	10.0%
Estimated Default Amount Due	\$ 10,000

The EALF calculates interest and special allowance (SA), where applicable, on the entire amount of ineligible loan principal. The number of days used to calculate interest and special allowance is based on average historical data for various time periods for different types of schools.

Period	School Type	One-Year	Two-Year	Four-Year	Rate Types
Disbursement to Repayment		584	774	969	Interest & SA
Repayment to Default		418	498	619	SA
Repayment to Paid In Full		1659	1580	1712	SA

The EALF uses the actual interest rates in effect when the ineligible loans were disbursed and an annualized average of the quarterly special allowance rates in effect. The EALF divides the number of days in each time period so that changes in interest and special allowance rates are considered. The EALF also assumes that the ineligible loans were made in two disbursements after a 30-day delay.

Example for the Disbursement to Repayment Period for a Two-Year Institution (2004-05)

Variable Rate Ineligible Loans: \$40,000 subsidized and \$60,000 unsubsidized

Interest Rates: 04-05 (2.77), 05-06 (4.70), 06-07 (6.54)

SA Rates: 04-05 (1.45), 05-06 (1.55), 06-07 (0.53)

Subsidized Loan Amount (Interest and Special Allowance)

$$\begin{aligned}
 & \$40,000/2 \times (451 \times (.0422/365)) \\
 & + \$40,000/2 \times (730 \times (.0625/365)) \\
 & + \$40,000/2 \times (367 \times (.0707/365)) = \$4,964.61
 \end{aligned}$$

Unsubsidized Loan Amount (Special Allowance Only)

$$\begin{aligned}
 & \$60,000/2 \times (451 \times (.0145/365)) \\
 & + \$60,000/2 \times (730 \times (.0155/365)) \\
 & + \$60,000/2 \times (367 \times (.0053/365)) = \$1,627.36
 \end{aligned}$$

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.

Appendix G

FSCJ File Review Spreadsheet - 2011

Appendix H

FSCJ File Review Spreadsheet - 2012

Appendix I

Statistical Sample Projection Matrix - 2011

Appendix I

Statistical Sample Projection Matrix - Single Finding

Institution: Florida State College at Jacksonville

Population Size

Statistical Sample Size

Finding:

Liability Projection Worksheet

Year	Name:	SSN:	Pell	Unsub Loan	Sub Loan	ACG
1	2011	(b)(6); (b)(7)(C)	4625.00	0.00	0.00	0.00
2	2011		0.00	0.00	0.00	0.00
3	2011		0.00	0.00	0.00	0.00
4	2011		0.00	0.00	0.00	0.00
5	2011		0.00	0.00	0.00	0.00
6	2011		0.00	0.00	0.00	0.00
7	2011		0.00	0.00	0.00	0.00
8	2011		0.00	0.00	0.00	0.00
9	2011		4162.00	0.00	0.00	563.00
10	2011		0.00	0.00	0.00	0.00
11	2011		0.00	0.00	0.00	0.00
12	2011		0.00	0.00	0.00	0.00
13	2011		0.00	0.00	0.00	0.00
14	2011		0.00	0.00	0.00	0.00
15	2011		0.00	0.00	0.00	0.00
16	2011		0.00	0.00	0.00	0.00
17	2011		0.00	0.00	0.00	0.00
18	2011		0.00	0.00	0.00	0.00
19	2011		718.00	0.00	0.00	0.00
20	2011		0.00	0.00	0.00	0.00
21	2011		0.00	0.00	0.00	0.00
22	2011		0.00	0.00	0.00	0.00
23	2011		0.00	0.00	0.00	0.00
24	2011		0.00	0.00	0.00	0.00

25	2011	(b)(6); (b)(7)(C)	0.00	0.00	0.00	0.00
26	2011		0.00	0.00	0.00	0.00
27	2011		0.00	0.00	0.00	0.00
28	2011		0.00	0.00	0.00	0.00
29	2011		0.00	0.00	0.00	0.00
30	2011		0.00	0.00	0.00	0.00
31	2011		0.00	0.00	0.00	0.00
32	2011		0.00	0.00	0.00	0.00
33	2011		2776.00	0.00	0.00	0.00
34	2011		0.00	0.00	0.00	0.00
35	2011		0.00	0.00	0.00	0.00
36	2011		0.00	0.00	0.00	0.00
37	2011		694.00	0.00	0.00	0.00
38	2011		0.00	0.00	0.00	0.00
39	2011		0.00	0.00	0.00	0.00
40	2011		0.00	0.00	0.00	0.00
41	2011		0.00	0.00	0.00	0.00
42	2011		0.00	0.00	0.00	0.00
43	2011		0.00	0.00	0.00	0.00
44	2011		537.00	0.00	2250.00	0.00
45	2011		693.00	3000.00	1750.00	0.00
46	2011		0.00	0.00	0.00	0.00
47	2011		531.00	0.00	0.00	0.00
48	2011		0.00	0.00	0.00	0.00
49	2011		0.00	0.00	0.00	0.00
50	2011		0.00	0.00	0.00	0.00
51	2011		450.00	0.00	2250.00	0.00
52	2011		0.00	0.00	0.00	0.00
53	2011		0.00	0.00	0.00	0.00
54	2011		0.00	0.00	0.00	0.00
55	2011		0.00	0.00	0.00	0.00
56	2011		0.00	0.00	0.00	0.00
57	2011		0.00	0.00	0.00	0.00
58	2011		0.00	0.00	0.00	0.00
59	2011		0.00	0.00	0.00	0.00
60	2011		0.00	0.00	0.00	0.00
61	2011		0.00	0.00	0.00	0.00

62	2011	(b)(6); (b)(7)(C)	0.00	0.00	0.00	0.00
63	2011		0.00	0.00	0.00	0.00
64	2011		0.00	0.00	0.00	0.00
65	2011		0.00	0.00	0.00	0.00
66	2011		0.00	0.00	0.00	0.00
67	2011		0.00	0.00	0.00	0.00
68	2011		0.00	0.00	0.00	0.00
69	2011		0.00	0.00	0.00	0.00
70	2011		0.00	0.00	0.00	0.00
71	2011		0.00	0.00	0.00	0.00
72	2011		0.00	0.00	0.00	0.00
73	2011		693.00	0.00	0.00	0.00
74	2011		0.00	0.00	0.00	0.00
75	2011		0.00	0.00	0.00	0.00
76	2011		0.00	0.00	0.00	0.00
77	2011		0.00	0.00	0.00	0.00
78	2011		0.00	0.00	0.00	0.00
79	2011		0.00	0.00	0.00	0.00
80	2011		0.00	0.00	0.00	0.00
81	2011		0.00	0.00	0.00	0.00
82	2011		0.00	0.00	0.00	0.00
83	2011		0.00	0.00	0.00	0.00
84	2011		0.00	0.00	0.00	0.00
85	2011		0.00	0.00	0.00	0.00
86	2011		0.00	0.00	0.00	0.00
87	2011		0.00	0.00	0.00	0.00
88	2011		0.00	0.00	0.00	0.00
89	2011		0.00	0.00	0.00	0.00
90	2011		0.00	0.00	0.00	0.00
91	2011		0.00	0.00	0.00	0.00
92	2011		0.00	0.00	0.00	0.00
93	2011		0.00	0.00	0.00	0.00
94	2011		0.00	0.00	0.00	0.00
95	2011		0.00	0.00	0.00	0.00
96	2011		0.00	0.00	0.00	0.00
97	2011		0.00	0.00	0.00	0.00
98	2011		0.00	0.00	0.00	0.00

173	2011	(b)(6); (b)(7)(C)	0.00	0.00	0.00	0.00
174	2011		0.00	0.00	0.00	0.00
175	2011		0.00	0.00	0.00	0.00
176	2011		0.00	0.00	0.00	0.00
177	2011		0.00	0.00	0.00	0.00
178	2011		0.00	0.00	0.00	0.00
179	2011		0.00	0.00	0.00	0.00
180	2011		0.00	0.00	0.00	0.00
181	2011		0.00	0.00	0.00	0.00
182	2011		0.00	0.00	0.00	0.00
183	2011		0.00	0.00	0.00	0.00
184	2011		0.00	0.00	0.00	0.00
185	2011		0.00	0.00	0.00	0.00
186	2011		0.00	0.00	0.00	0.00
187	2011		0.00	0.00	0.00	0.00
188	2011		0.00	0.00	0.00	0.00
189	2011		0.00	0.00	0.00	0.00
190	2011		0.00	0.00	0.00	0.00
191	2011		1387.00	0.00	0.00	0.00
192	2011		0.00	0.00	0.00	0.00
193	2011		0.00	0.00	0.00	0.00
194	2011		0.00	0.00	0.00	0.00
195	2011		0.00	0.00	0.00	0.00
196	2011		0.00	0.00	0.00	0.00
197	2011		0.00	0.00	0.00	0.00
198	2011		0.00	0.00	0.00	0.00
199	2011		0.00	0.00	0.00	0.00
200	2011		0.00	0.00	0.00	0.00
201	2011		0.00	0.00	0.00	0.00
202	2011		0.00	0.00	0.00	0.00
203	2011	0.00	0.00	0.00	0.00	
204	2011	0.00	0.00	0.00	0.00	
205	2011	0.00	0.00	0.00	0.00	
206	2011	0.00	0.00	0.00	0.00	
207	2011	0.00	0.00	0.00	0.00	
208	2011	0.00	0.00	0.00	0.00	
209	2011	0.00	0.00	0.00	0.00	

210	2011	(b)(6); (b)(7)(C)	0.00	0.00	0.00	0.00
211	2011		0.00	0.00	0.00	0.00
212	2011		0.00	0.00	0.00	0.00
213	2011		0.00	0.00	0.00	0.00
214	2011		0.00	0.00	0.00	0.00
215	2011		0.00	0.00	0.00	0.00
216	2011		0.00	0.00	0.00	0.00
217	2011		0.00	0.00	0.00	0.00
218	2011		0.00	0.00	0.00	0.00
219	2011		0.00	6000.00	4500.00	0.00
220	2011		1620.00	0.00	0.00	0.00
221	2011		0.00	0.00	0.00	0.00
222	2011		0.00	0.00	0.00	0.00
223	2011		0.00	0.00	0.00	0.00
224	2011		1147.00	0.00	0.00	0.00
225	2011		693.00	0.00	0.00	0.00
226	2011		0.00	0.00	0.00	0.00
227	2011		0.00	0.00	0.00	0.00
228	2011		0.00	0.00	0.00	0.00
229	2011		0.00	0.00	0.00	0.00
230	2011		0.00	0.00	0.00	0.00
231	2011		0.00	0.00	0.00	0.00
232	2011		0.00	0.00	0.00	0.00
233	2011		0.00	0.00	0.00	0.00
234	2011		0.00	0.00	0.00	0.00
235	2011		0.00	0.00	0.00	0.00
236	2011		0.00	0.00	0.00	0.00
237	2011		0.00	0.00	0.00	0.00
238	2011		0.00	0.00	0.00	0.00
239	2011		0.00	0.00	0.00	0.00
240	2011		0.00	0.00	0.00	0.00
241	2011		0.00	0.00	0.00	0.00
242	2011		0.00	0.00	0.00	0.00
243	2011		0.00	0.00	0.00	0.00
244	2011		0.00	0.00	0.00	0.00
245	2011		0.00	0.00	0.00	0.00
246	2011		2080.00	0.00	0.00	0.00
			0.00	0.00	0.00	0.00

284	2011	(b)(6); (b)(7)(C)	693.00	0.00	0.00	162.00
285	2011		0.00	0.00	0.00	0.00
286	2011		0.00	0.00	0.00	0.00
287	2011		0.00	0.00	0.00	0.00
288	2011		0.00	0.00	0.00	0.00
289	2011		0.00	0.00	0.00	0.00
290	2011		0.00	0.00	0.00	0.00
291	2011		0.00	0.00	0.00	0.00
292	2011		0.00	0.00	0.00	0.00
293	2011		0.00	0.00	0.00	0.00
294	2011		0.00	0.00	0.00	0.00
295	2011		0.00	0.00	0.00	0.00
296	2011		0.00	0.00	0.00	0.00
297	2011		0.00	0.00	0.00	0.00
298	2011		694.00	0.00	0.00	0.00
299	2011		0.00	0.00	0.00	0.00
300	2011		0.00	0.00	0.00	0.00
301	2011		0.00	0.00	0.00	0.00
302	2011		0.00	0.00	0.00	0.00
303	2011		693.00	0.00	0.00	0.00
304	2011		0.00	0.00	0.00	0.00
305	2011		0.00	0.00	0.00	0.00
306	2011		0.00	0.00	0.00	0.00
307	2011		0.00	0.00	0.00	0.00
308	2011		0.00	0.00	0.00	0.00
309	2011		0.00	0.00	0.00	0.00
310	2011		0.00	0.00	0.00	0.00
311	2011		0.00	0.00	0.00	0.00
312	2011		0.00	0.00	0.00	0.00
313	2011		0.00	0.00	0.00	0.00
314	2011		0.00	0.00	0.00	0.00
315	2011		0.00	0.00	0.00	0.00
316	2011	0.00	0.00	0.00	0.00	
317	2011	0.00	0.00	0.00	0.00	
318	2011	0.00	0.00	0.00	0.00	
319	2011	0.00	0.00	0.00	0.00	
320	2011	0.00	0.00	0.00	0.00	

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

321 2011
 322 2011
 323 2011
 324 2011
 325 2011
 326 2011
 327 2011
 328 2011
 329 2011
 330 2011
 331 2011
 332 2011
 333 2011
 334 2011
 335 2011
 336 2011
 337 2011
 338 2011
 339 2011
 340 2011
 341 2011
 342 2011
 343 2011
 344 2011
 345 2011
 346 2011
 347 2011
 348 2011
 349 2011
 350 2011
 351 2011
 352 2011
 353 2011
 354 2011
 355 2011
 356 2011
 357 2011

487.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
2081.00	3000.00	1750.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	2250.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
693.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
1387.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
337.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00
0.00	0.00	0.00	0.00

358	2011	(b)(6); (b)(7)(C)	0.00	0.00	0.00	0.00
359	2011		0.00	0.00	0.00	0.00
360	2011		0.00	0.00	0.00	0.00
361	2011		0.00	0.00	0.00	0.00
362	2011		0.00	0.00	0.00	0.00
363	2011		0.00	0.00	0.00	0.00
364	2011		0.00	0.00	1024.00	0.00
365	2011		0.00	0.00	0.00	0.00
366	2011		0.00	0.00	0.00	0.00
367	2011		0.00	0.00	0.00	0.00
368	2011		0.00	0.00	0.00	0.00
369	2011		0.00	0.00	0.00	0.00
370	2011		0.00	0.00	0.00	0.00
371	2011		0.00	0.00	0.00	0.00
372	2011		0.00	0.00	0.00	0.00
373	2011		0.00	0.00	0.00	0.00
374	2011		0.00	0.00	0.00	0.00
375	2011		0.00	0.00	0.00	0.00
376	2011		0.00	0.00	0.00	0.00

1.00		Pell	Unsub Loan	Sub Loan	ACG
Total Liability in Sample		\$38,651.00	\$14,631.00	\$18,658.00	\$725.00
Liability Projection	Number of Students in Population	17900	17900	17900	17900
	Number of Students in Sample	376	376	376	376
	Average Liability Per Student in Sample	\$102.80	\$38.91	\$49.62	\$1.93
	UCL:	\$2,636,269.60	\$1,414,677.58	\$1,518,822.14	\$88,595.70
Projected Liability	\$1,840,120.00	\$696,489.00	\$888,198.00	\$34,547.00	
LCL:	\$1,043,970.40	(\$21,699.58)	\$257,573.86	(\$19,501.70)	
Projected Fatal Error Rate	UCL:	9.6%	1.2%	2.6%	0.6%
		8.8%	1.1%	2.4%	0.5%
	LCL:	8.0%	1.0%	2.2%	0.5%
Standard Deviation		444.722797	401.174396	352.261601	30.191171
Plus/Minus for UCL/LCL		796149.60	718188.58	630624.14	54048.70

Records

376	376	376	376
-----	-----	-----	-----

Appendix J

Statistical Sample Projection Matrix - 2012

Appendix J

Statistical Sample Projection Matrix - Single Finding

Institution: Florida State College at Jacksonville

Population Size

Statistical Sample Size

Finding:

Liability Projection Worksheet

Year	Name:	SSN:	Pell	Unsub Loan	Sub Loan	FSEOG
1	2012	(b)(6); (b)(7)(C)	0.00	0.00	0.00	0.00
2	2012		0.00	0.00	0.00	0.00
3	2012		0.00	0.00	0.00	0.00
4	2012		0.00	0.00	0.00	0.00
5	2012		0.00	0.00	0.00	0.00
6	2012		0.00	0.00	0.00	0.00
7	2012		0.00	0.00	0.00	0.00
8	2012		0.00	0.00	0.00	0.00
9	2012		750.00	0.00	0.00	0.00
10	2012		0.00	0.00	0.00	0.00
11	2012		0.00	0.00	0.00	0.00
12	2012		400.00	0.00	0.00	0.00
13	2012		0.00	0.00	0.00	0.00
14	2012		0.00	0.00	0.00	0.00
15	2012		0.00	0.00	0.00	0.00
16	2012		0.00	0.00	0.00	0.00
17	2012		0.00	0.00	0.00	0.00
18	2012		0.00	0.00	0.00	0.00
19	2012		0.00	0.00	0.00	0.00
20	2012		0.00	0.00	0.00	0.00
21	2012		0.00	0.00	0.00	0.00
22	2012		0.00	0.00	0.00	0.00
23	2012		0.00	0.00	0.00	0.00
24	2012		0.00	0.00	0.00	0.00

25	2012	(b)(6); (b)(7)(C)	0.00	0.00	0.00	0.00
26	2012		0.00	0.00	0.00	0.00
27	2012		0.00	0.00	0.00	0.00
28	2012		0.00	0.00	0.00	0.00
29	2012		0.00	0.00	0.00	0.00
30	2012		0.00	0.00	0.00	0.00
31	2012		0.00	0.00	0.00	0.00
32	2012		0.00	0.00	0.00	0.00
33	2012		0.00	0.00	0.00	0.00
34	2012		0.00	0.00	0.00	0.00
35	2012		0.00	0.00	0.00	0.00
36	2012		0.00	0.00	0.00	0.00
37	2012		0.00	0.00	0.00	0.00
38	2012		0.00	0.00	0.00	0.00
39	2012		0.00	0.00	0.00	0.00
40	2012		0.00	0.00	0.00	0.00
41	2012		0.00	0.00	0.00	0.00
42	2012		0.00	0.00	0.00	0.00
43	2012		0.00	0.00	0.00	0.00
44	2012		0.00	0.00	0.00	0.00
45	2012		0.00	0.00	0.00	0.00
46	2012		0.00	0.00	0.00	0.00
47	2012		0.00	0.00	0.00	0.00
48	2012		0.00	0.00	0.00	0.00
49	2012		0.00	0.00	0.00	0.00
50	2012		0.00	0.00	0.00	0.00
51	2012		0.00	0.00	0.00	0.00
52	2012		0.00	0.00	0.00	0.00
53	2012		0.00	0.00	0.00	0.00
54	2012		0.00	0.00	0.00	0.00
55	2012		0.00	0.00	0.00	0.00
56	2012		0.00	0.00	0.00	0.00
57	2012		0.00	0.00	0.00	0.00
58	2012		693.00	0.00	0.00	0.00
59	2012		0.00	0.00	0.00	0.00
60	2012		0.00	0.00	0.00	0.00
61	2012		0.00	0.00	0.00	0.00

62	2012	(b)(6); (b)(7)(C)	0.00	1000.00	0.00	0.00
63	2012		0.00	0.00	0.00	0.00
64	2012		0.00	0.00	0.00	0.00
65	2012		0.00	0.00	0.00	0.00
66	2012		0.00	0.00	0.00	0.00
67	2012		0.00	0.00	0.00	0.00
68	2012		0.00	0.00	0.00	0.00
69	2012		745.00	0.00	0.00	0.00
70	2012		0.00	0.00	0.00	0.00
71	2012		0.00	0.00	0.00	0.00
72	2012		0.00	0.00	0.00	0.00
73	2012		0.00	0.00	0.00	0.00
74	2012		0.00	0.00	0.00	0.00
75	2012		0.00	0.00	0.00	0.00
76	2012		0.00	0.00	0.00	0.00
77	2012		0.00	0.00	0.00	0.00
78	2012		0.00	0.00	0.00	0.00
79	2012		0.00	0.00	0.00	0.00
80	2012		0.00	0.00	0.00	0.00
81	2012		0.00	0.00	0.00	0.00
82	2012		0.00	0.00	0.00	0.00
83	2012		0.00	0.00	0.00	0.00
84	2012		0.00	0.00	0.00	0.00
85	2012		0.00	0.00	0.00	0.00
86	2012		0.00	0.00	0.00	0.00
87	2012		0.00	0.00	0.00	0.00
88	2012		0.00	0.00	0.00	0.00
89	2012		0.00	0.00	0.00	0.00
90	2012		0.00	0.00	0.00	0.00
91	2012		0.00	0.00	0.00	0.00
92	2012		0.00	0.00	0.00	0.00
93	2012		0.00	821.00	2750.00	0.00
94	2012		694.00	0.00	0.00	0.00
95	2012		0.00	0.00	0.00	0.00
96	2012		0.00	0.00	0.00	0.00
97	2012		0.00	0.00	0.00	0.00
98	2012		0.00	0.00	0.00	0.00

99	2012	(b)(6); (b)(7)(C)	0.00	0.00	0.00	0.00
100	2012		0.00	0.00	0.00	0.00
101	2012		0.00	0.00	0.00	0.00
102	2012		0.00	0.00	0.00	0.00
103	2012		0.00	0.00	0.00	0.00
104	2012		0.00	0.00	0.00	0.00
105	2012		0.00	0.00	0.00	0.00
106	2012		0.00	0.00	0.00	0.00
107	2012		0.00	0.00	0.00	0.00
108	2012		0.00	0.00	0.00	0.00
109	2012		0.00	0.00	0.00	0.00
110	2012		0.00	0.00	0.00	0.00
111	2012		0.00	0.00	0.00	0.00
112	2012		0.00	0.00	0.00	0.00
113	2012		0.00	0.00	0.00	0.00
114	2012		0.00	0.00	0.00	0.00
115	2012		694.00	0.00	1896.00	0.00
116	2012		693.00	0.00	0.00	0.00
117	2012		0.00	0.00	0.00	0.00
118	2012		0.00	0.00	0.00	0.00
119	2012		0.00	0.00	0.00	0.00
120	2012		0.00	0.00	0.00	0.00
121	2012		0.00	0.00	0.00	0.00
122	2012		0.00	0.00	0.00	0.00
123	2012		0.00	0.00	0.00	0.00
124	2012		0.00	0.00	0.00	0.00
125	2012		0.00	0.00	0.00	0.00
126	2012		0.00	0.00	0.00	0.00
127	2012		0.00	0.00	0.00	0.00
128	2012		0.00	0.00	0.00	0.00
129	2012		0.00	0.00	0.00	0.00
130	2012		0.00	0.00	0.00	0.00
131	2012		0.00	0.00	0.00	0.00
132	2012		0.00	0.00	0.00	0.00
133	2012		0.00	0.00	0.00	0.00
134	2012	0.00	0.00	0.00	0.00	
135	2012	0.00	0.00	0.00	0.00	

173	2012	(b)(6); (b)(7)(C)	0.00	0.00	0.00	0.00
174	2012		1089.00	0.00	0.00	0.00
175	2012		0.00	0.00	0.00	0.00
176	2012		0.00	0.00	0.00	0.00
177	2012		0.00	0.00	0.00	0.00
178	2012		0.00	0.00	0.00	0.00
179	2012		0.00	0.00	0.00	0.00
180	2012		0.00	0.00	0.00	0.00
181	2012		0.00	0.00	0.00	0.00
182	2012		0.00	0.00	0.00	0.00
183	2012		0.00	0.00	0.00	0.00
184	2012		0.00	0.00	0.00	0.00
185	2012		0.00	0.00	0.00	0.00
186	2012		694.00	0.00	0.00	0.00
187	2012		0.00	0.00	0.00	0.00
188	2012		0.00	0.00	0.00	0.00
189	2012		0.00	0.00	0.00	0.00
190	2012		0.00	0.00	0.00	0.00
191	2012		0.00	0.00	0.00	0.00
192	2012		0.00	0.00	0.00	0.00
193	2012		0.00	0.00	0.00	0.00
194	2012		0.00	0.00	0.00	0.00
195	2012		0.00	0.00	0.00	0.00
196	2012		0.00	0.00	0.00	0.00
197	2012		0.00	0.00	0.00	0.00
198	2012		0.00	0.00	0.00	0.00
199	2012		1387.00	2000.00	1500.00	0.00
200	2012		0.00	0.00	0.00	0.00
201	2012		0.00	0.00	0.00	0.00
202	2012		0.00	0.00	0.00	0.00
203	2012		0.00	0.00	0.00	0.00
204	2012		0.00	0.00	0.00	0.00
205	2012		0.00	0.00	0.00	0.00
206	2012		0.00	0.00	0.00	0.00
207	2012		0.00	0.00	0.00	0.00
208	2012		0.00	0.00	0.00	0.00
209	2012		0.00	0.00	0.00	0.00

210	2012	(b)(6); (b)(7(C))	0.00	0.00	0.00	0.00
211	2012		0.00	0.00	0.00	0.00
212	2012		0.00	0.00	0.00	0.00
213	2012		0.00	0.00	0.00	0.00
214	2012		0.00	0.00	0.00	0.00
215	2012		0.00	0.00	0.00	0.00
216	2012		0.00	0.00	0.00	0.00
217	2012		0.00	0.00	0.00	0.00
218	2012		0.00	0.00	0.00	0.00
219	2012		0.00	0.00	0.00	0.00
220	2012		0.00	0.00	0.00	0.00
221	2012		0.00	0.00	0.00	0.00
222	2012		0.00	0.00	0.00	0.00
223	2012		238.00	0.00	0.00	0.00
224	2012		0.00	0.00	0.00	0.00
225	2012		0.00	0.00	0.00	0.00
226	2012		0.00	0.00	0.00	0.00
227	2012		0.00	0.00	0.00	0.00
228	2012		0.00	0.00	0.00	0.00
229	2012		0.00	0.00	0.00	0.00
230	2012		0.00	0.00	0.00	0.00
231	2012		1388.00	0.00	0.00	0.00
232	2012		0.00	0.00	0.00	0.00
233	2012		0.00	0.00	0.00	0.00
234	2012		0.00	0.00	0.00	0.00
235	2012		0.00	0.00	0.00	0.00
236	2012		0.00	0.00	0.00	0.00
237	2012		0.00	0.00	0.00	0.00
238	2012		0.00	0.00	0.00	0.00
239	2012		0.00	0.00	0.00	0.00
240	2012		0.00	0.00	0.00	0.00
241	2012		0.00	0.00	0.00	0.00
242	2012		0.00	0.00	0.00	0.00
243	2012		0.00	0.00	0.00	0.00
244	2012		0.00	0.00	0.00	0.00
245	2012		0.00	0.00	0.00	0.00
246	2012		0.00	0.00	0.00	0.00

247	2012	(b)(6); (b)(7)(C)	0.00	0.00	0.00	0.00
248	2012		0.00	0.00	0.00	0.00
249	2012		0.00	0.00	0.00	0.00
250	2012		0.00	0.00	0.00	0.00
251	2012		0.00	0.00	0.00	0.00
252	2012		0.00	0.00	0.00	0.00
253	2012		0.00	0.00	0.00	0.00
254	2012		0.00	0.00	0.00	0.00
255	2012		1200.00	0.00	0.00	0.00
256	2012		0.00	0.00	0.00	0.00
257	2012		0.00	0.00	0.00	0.00
258	2012		0.00	0.00	0.00	0.00
259	2012		0.00	0.00	0.00	0.00
260	2012		0.00	0.00	0.00	0.00
261	2012		694.00	0.00	0.00	0.00
262	2012		0.00	0.00	0.00	0.00
263	2012		0.00	0.00	0.00	0.00
264	2012		0.00	0.00	0.00	0.00
265	2012		0.00	0.00	0.00	0.00
266	2012		0.00	0.00	0.00	0.00
267	2012		0.00	0.00	0.00	0.00
268	2012		0.00	0.00	0.00	0.00
269	2012		0.00	0.00	0.00	0.00
270	2012		0.00	0.00	0.00	0.00
271	2012		0.00	0.00	0.00	0.00
272	2012		0.00	0.00	1625.00	0.00
273	2012		0.00	0.00	0.00	0.00
274	2012		0.00	0.00	0.00	0.00
275	2012		0.00	0.00	0.00	0.00
276	2012		0.00	0.00	0.00	0.00
277	2012		0.00	0.00	0.00	0.00
278	2012		0.00	0.00	0.00	0.00
279	2012		0.00	0.00	0.00	0.00
280	2012		0.00	0.00	0.00	0.00
281	2012		0.00	0.00	0.00	0.00
282	2012		0.00	0.00	0.00	0.00
283	2012		0.00	0.00	0.00	0.00

321	2012	(b)(6); (b)(7)(C)	0.00	0.00	0.00	0.00
322	2012		0.00	0.00	0.00	0.00
323	2012		0.00	0.00	0.00	0.00
324	2012		0.00	0.00	0.00	0.00
325	2012		0.00	0.00	0.00	0.00
326	2012		0.00	0.00	0.00	0.00
327	2012		0.00	0.00	0.00	0.00
328	2012		0.00	0.00	0.00	0.00
329	2012		693.00	0.00	0.00	0.00
330	2012		0.00	0.00	0.00	0.00
331	2012		0.00	0.00	0.00	0.00
332	2012		0.00	0.00	0.00	0.00
333	2012		0.00	0.00	0.00	0.00
334	2012		0.00	0.00	0.00	0.00
335	2012		0.00	0.00	0.00	0.00
336	2012		0.00	0.00	0.00	0.00
337	2012		0.00	0.00	0.00	0.00
338	2012		0.00	0.00	0.00	0.00
339	2012		0.00	0.00	0.00	0.00
340	2012		0.00	0.00	0.00	0.00
341	2012		0.00	0.00	0.00	0.00
342	2012		0.00	0.00	0.00	0.00
343	2012		0.00	0.00	0.00	0.00
344	2012		0.00	0.00	0.00	0.00
345	2012		0.00	0.00	0.00	0.00
346	2012		0.00	0.00	0.00	0.00
347	2012		0.00	0.00	0.00	0.00
348	2012		0.00	0.00	0.00	0.00
349	2012		0.00	0.00	0.00	0.00
350	2012		1124.00	3000.00	0.00	0.00
351	2012		0.00	0.00	0.00	0.00
352	2012		0.00	0.00	0.00	0.00
353	2012		0.00	0.00	0.00	0.00
354	2012		0.00	0.00	0.00	0.00
355	2012		0.00	0.00	0.00	0.00
356	2012	0.00	0.00	0.00	0.00	
357	2012	0.00	0.00	0.00	0.00	

358	2012	(b)(6); (b)(7)(C)	0.00	0.00	0.00	0.00
359	2012		0.00	0.00	0.00	0.00
360	2012		48.00	0.00	2250.00	0.00
361	2012		0.00	0.00	0.00	0.00
362	2012		0.00	0.00	0.00	0.00
363	2012		0.00	0.00	0.00	0.00
364	2012		0.00	0.00	0.00	0.00
365	2012		0.00	0.00	0.00	0.00
366	2012		0.00	0.00	0.00	0.00
367	2012		0.00	0.00	0.00	0.00
368	2012		0.00	0.00	0.00	0.00
369	2012		0.00	0.00	0.00	0.00
370	2012		0.00	0.00	0.00	0.00
371	2012		0.00	0.00	0.00	0.00
372	2012		0.00	0.00	0.00	0.00
373	2012		0.00	0.00	0.00	0.00
374	2012		0.00	0.00	0.00	0.00
375	2012		0.00	0.00	0.00	0.00
376	2012		0.00	0.00	0.00	0.00
377	2012		0.00	0.00	0.00	0.00

1.00		Pell	Unsub Loan	Sub Loan	FSEOG
Liability Projection	Total Liability in Sample	\$24,738.00	\$14,321.00	\$11,771.00	\$800.00
	Number of Students in Population	21040	21040	21040	21040
	Number of Students in Sample	377	377	377	377
	Average Liability Per Student in Sample	\$65.62	\$37.99	\$31.22	\$2.12

UCL:	\$2,222,091.20	\$1,514,227.17	\$1,186,469.96	\$131,367.88
Projected Liability	\$1,380,644.80	\$799,309.60	\$656,868.80	\$44,646.88
LCL:	\$539,198.40	\$84,392.03	\$127,267.64	(\$42,074.12)

UCL:	6.4%	1.7%	1.7%	0.3%
Projected Fatal Error Rate	5.8%	1.6%	1.6%	0.3%
LCL:	5.3%	1.4%	1.4%	0.2%

Standard Deviation	399.780408	339.665170	251.619316	41.202096
Plus/Minus for UCL/LCL	841446.40	714917.57	529601.16	86721.00

Records

377	377	377	377
-----	-----	-----	-----

Appendix K
Cost of Funds 2011

Appendix L
Cost of Funds 2012

Appendix M
Estimated Loss 2011 and 2012

Estimated Loss Formula

Enter Institution Name Florida State College at Jacksonville

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	\$ 888,198.00	13.60%	4.20%	\$ 37,321.77
2	DL Unsubsidized	2010-2011	\$ 696,489.00	13.60%	-30.02%	\$ -
3						
	2010-2011		\$ 1,584,687.00			\$ 37,321.77
4	DL Subsidized	2011-2012	\$ 656,868.80	13.60%	11.23%	\$ 73,756.59
5	DL Unsubsidized	2011-2012	\$ 799,309.60	13.60%	-23.72%	\$ -
6						
	2011-2012		\$ 1,456,178.40			\$ 73,756.59
7						
8						
9						
	Description		\$ -			\$ -
10						
11						
12						
	Description		\$ -			\$ -
	Original Ineligible Loan Liability		\$ 3,040,865.40	Total Estimated Loss		\$ 111,078.36

Appendix M

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 OSR ***
1	13.60%	7.78%	1.75	0.69%	1.21%	-0.04%	2017	31.8%	2.02%	7.52%
2	13.60%	7.78%	1.75	1.64%	2.87%	33.31%	2017	40.1%	2.52%	1.48%
3										
4	13.60%	7.78%	1.75	0.39%	0.68%	6.49%	2018	31.8%	2.64%	10.13%
5	13.60%	7.78%	1.75	1.29%	2.26%	27.91%	2018	40.2%	3.07%	1.74%
6										
7										
8										
9										
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.

Appendix N

FedWire Instructions

**DEPARTMENT OF EDUCATION
FED-WIRE EFT MESSAGE FORMAT & INSTRUCTIONS**

ABA Number 021030004	Type/Sub-Type	
Sender No.:	Sender Ref. No.	Amount ①

Sender Name (Automatically inserted by the Federal Reserve Bank)

Treasury Department Name/CTR/
TREAS NYC / CTR /

BNF=ED / AC - 91020001 OBI=

Name / City / State:
②

DUNS / TIN:
③

FOR:
④

INSTRUCTIONS

- A. Complete circled items 1-4 above as follows:
- ①** Indicate amount including cents digits.
 - ②** Indicate Name, City, and State.
 - ③** Indicate DUNS Number and Taxpayer Identification Number (TIN).
 - ④** Enter the reason for the remittance: Bill Number / Document Number / Other.
- B. Provide the sending bank with a copy of the completed form. This form contains other information the bank will need to transmit the FEDWIRE message.

Checklist - FPRD Review	
Responsible Reviewer: Jon Finkelstein	Delivery Tracking # 1ZA879640190020642
Institution Name: Florida State College at Jacksonville	
OPE ID: 00148400	PRCN: 201240428075
Date: 2/25/2014	
Cover Letter	
X	Letter is addressed to the correct person
X	Letter includes certified mail information
X	Correct standard paragraphs included
FPRD Report	
X	Correct type of FPRD drafted (FPRD – No Further Action Required; FPRD – Further Action Required; FPRD – No Program Review Report Issued; FPRD – Closed School Loan Discharges)
X	FPRD prepared in accordance with standard procedures
X	Findings and Final Determinations correctly stated
X	Citations are appropriate to the findings and cited correctly
X	Description of each instance of noncompliance is sufficiently detailed to clearly identify the institution's regulatory violations
X	Summary of Liabilities included with correct amounts
X	Payment Instructions prepared correctly
X	Student Sample Appendix is properly prepared with only first and last names and last four digits of students' SSNs
X	Other appendices, if any, are properly prepared or enclosed as attachments
PEPS Data Entry Worksheet	
X	PEPS Data Entry form correctly completed (including repayment method and liability amounts) Level of Review accurately reflects the deficiencies
N/A	For FPRD - No Program Review Report Issued only: Deficiency codes are appropriate to the findings
Approvals	
✓	For FPRDs with liabilities of at least \$100,000 but less than \$1,000,000, approval obtained from OGC
	For FPRDs with liabilities of \$1,000,000 or more, approval obtained from OGC and SESG General Manager
CM Signature: (b)(6); (b)(7)(C)	Date: 3/17/2014
DD Signature:	Date: 17 Mar 2014