



September 22, 2014

Stanley Preczewski, Ph.D.
President
Georgia Gwinnett College
1000 University Center Lane
Lawrenceville, GA 30043-7409

Re: Final Program Review Determination
OPE ID Number: 04142900
PRCN: 201420428497

Dear Dr. Preczewski Ph.D:

The U.S. Department of Education's (Department's) School Participation Division – Atlanta issued a program review report on April 16, 2014 covering Georgia Gwinnett College's (GGC's) administration of programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2012-2013 and 2013-2014 award years. GGC's final response was received on September 11, 2014.

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

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

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).

Federal Student Aid

AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION
Atlanta School Participation Division
61 Forsyth St., SW, Room 18T40
Atlanta, GA 30303-8918

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 Lisa Lancaster at (404) 974-9296.

Sincerely,

(b)(6)



Chris Miller
Director
School Participation Division-Atlanta

cc: Kimberly Jordan, Financial Aid Director
Southern Association of Colleges and Schools Commission on Colleges
GA Board of Regents of the University System of Georgia

Enclosures:

Georgia Gwinnett College
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Page 1

Prepared for-
Georgia Gwinnett College

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

Program Review Report
April 16, 2014

Table of Contents

A.	Institutional Information	3
B.	Scope of Review	4
C.	Findings	4
	1. Satisfactory Academic Progress Policy – Not All Elements Included	5
	2. Satisfactory Academic Progress – Ineligible Student	7
	3. Verification – Conflicting Applicant Data	8
	4. Unidentified Withdrawal / Return Calculation for Withdrawn Student	11
	5. Exit Loan Counseling Not Always Documented	12
	6. Late Enrollment Reporting to the National Student Loan Data System	13
	7. Community Service Requirement Not Met for FWS Program	15
D.	Appendices	16
	Appendix-A: Student Sample	17
	Appendix-B: Protection Of Personally Identifiable Information	18

A. Institutional Information

Georgia Gwinnett College
1000 University Center Lane
Lawrenceville, GA 30043-7409

Type: Public

Highest Level of Offering: Bachelor's Degree

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

Current Student Enrollment: 9,440 (2013-2014)

% of Students Receiving Title IV: 71% (2013-2014)

Title IV Participation (per EDCAPS G5):

<u>Program</u>	<u>2013-2014 (to date)</u>
Federal Direct Loan (FDL)	\$35,982,560
Federal Pell Grant (Pell)	\$23,081,907
Federal Supplemental Education Grant (FSEOG)	\$ 36,225
Federal Work Study (FWS)	\$ 92,703

Default Rate / FDL:	2011	12%
	2010	8%
	2009	0%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Georgia Gwinnett College (GGC) from January 27, 2014 – February 3, 2014. The review was conducted by Lisa Lancaster and Angelique James.

The focus of the review was to examine GGC'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 GGC'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 34 files was identified for review from the 2012-2013 and 2013-2014 award years. The files were selected randomly from a statistical sample of the total population of students receiving Title IV, HEA program funds for each award year. **Appendix A** lists the names and social security numbers of the students whose files were examined during the program review.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning GGC's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, the program review does not relieve GGC 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 GGC to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding 1: Satisfactory Academic Progress Policy – Not All Elements Included

Citation:

Student Assistance General Provisions 34 C.F.R. §§ 668.16 (e), 668.32, and 668.34 require institutions to establish, publish, and apply reasonable standards for measuring whether an otherwise eligible student is maintaining satisfactory academic progress (SAP) in his or her educational program. The Secretary considers an institution's standards to be reasonable if the standards—

- Are the same as or stricter than the institution's standards for a student enrolled in the same educational program who is not receiving Title IV assistance.
- The policy provides for consistent application of standards to all students within categories of students, *e.g.*, full-time, part-time, undergraduate, and graduate students, and educational programs established by the institution.
- The policy provides that a student's academic progress is evaluated—
 - At the end of each payment period if the educational program is either one academic year in length or shorter than an academic year; or
 - For all other educational programs, at the end of each payment period or at least annually to correspond with the end of a payment period.
- The policy specifies a *qualitative* standard, or grade point average (GPA) that a student must achieve at each evaluation (if a GPA is not an appropriate qualitative measure, a comparable assessment measured against a norm).
- If a student is enrolled in an educational program of more than two academic years, the policy specifies that at the end of the second academic year, the student must have a GPA of at least a “C” or its equivalent.
- The policy specifies a *quantitative* standard, or the pace at which a student must progress through his or her educational program to ensure that he will complete the program within the maximum timeframe, and provides for measurement of the student's progress at each evaluation. For an undergraduate program, maximum timeframe means a period that is no longer than 150% of the published length of the educational program. For a graduate program, it means a period defined by the institution that is based on the length of the program.
- An institution calculates the *pace* at which the student is progressing by dividing the cumulative number of hours the student has successfully completed by the cumulative number of hours the student has attempted.
- An institution is not required to include *remedial* courses in its quantitative assessment of SAP, but it is required to include remedial coursework in its qualitative assessment. (The courses need not be included in the student's GPA; however, a school must have some means of assessing a student's academic progress in remedial coursework.)

- The policy also must describe how a student's GPA and pace of completion are affected by *course incompletes, withdrawals, repetitions, or transfer* of credit from other institutions. Credit hours from another institution that are accepted toward the student's educational program must count as both attempted and completed hours. An SAP policy cannot exclude courses in which a student remained past the add/drop period and earned a grade of 'W', nor can it routinely exclude certain hours attempted, such as those taken during a summer term. All periods of the student's enrollment count when assessing progress, even periods in which the student did not receive Title IV funds.
- The policy provides that, at the time of each evaluation, a student who has not achieved the required GPA, or who is not successfully completing his or her educational program at the required pace, is no longer eligible to receive assistance.
- If the institution places students on *financial aid warning*, or on *financial aid probation*, the policy describes these statuses as—
 - Financial aid warning is a status assigned to a student who fails to make SAP only at an institution that evaluates academic progress at the end of each payment period. Financial aid warning may be assigned without an appeal or other action by the student. It is good for one payment period.
 - Financial aid probation is a status assigned by an institution to a student who fails to make SAP but who has appealed, and has had eligibility for aid reinstated. A student on financial aid probation may receive Title IV funds for one payment period. However, a student on financial aid probation may *not* receive Title IV funds for the subsequent payment period unless the student makes satisfactory academic progress or the institution places him on probation and develops an academic plan.
- If the school permits *appeals*, the policy must explain that the student may appeal on the basis of: his injury or illness, the death of a relative, or other mitigating circumstances. The appeal must also explain why he or she failed to make satisfactory progress and what has changed in his situation that will allow him to make satisfactory progress at the next evaluation.
- If the institution does not permit a student to appeal a determination that he or she is not making SAP, the policy must describe how the student may reestablish his or her eligibility to receive assistance under the Title IV programs.
- The institution must have a policy to notify students of the results of an SAP evaluation that impacts his or her eligibility for funds.

Noncompliance:

GGC officials explained that it was institutional policy to not include remedial courses in its quantitative assessment of SAP for Title IV recipients. However, the treatment of how remedial coursework would be assessed was not addressed in GGC's written policies and procedures. For example, between Summer 2011 and Fall 2012, **student 15** enrolled in six

remedial courses and passed none. She received Federal Pell Grant and Federal Direct Loan (FDL) funding from the 2010-2011, 2011-2012 and 2012-2013 award years. The student was placed on academic warning at the end of the Spring 2012 term, however, the school's SAP policy did not specify its policy for assessing students' academic progress in remedial coursework.

Another element that was excluded from the school's SAP policy was the requirement for a student who appeals his or her suspension of Title IV aid to explain what has changed in his or her situation to allow the student to make satisfactory progress at the next evaluation.

Required Action:

GGC must immediately correct its written policies and procedures to address the treatment of remedial coursework in its assessment of SAP for Title IV recipients. The institution must also revise its published SAP policy to inform students of the basis of appealing their determination of SAP. Lastly, staff members involved in the process of evaluating student appeals must have a clear understanding of the necessary criteria to appeal one's determination of Title IV aid.

Student 15 withdrew from GGC on December 20, 2012; therefore no further action is required.

In response to this finding, please provide a copy of GGC's revised SAP policies and procedures.

Finding 2: Satisfactory Academic Progress – Ineligible Student

Citation:

As noted in the above finding, 34 C.F.R. §§ 668.16 (e), 668.32, and 668.34 require institutions to establish, publish, and apply reasonable standards for measuring whether an otherwise eligible student is maintaining SAP.

An SAP policy must specify a quantitative standard, or pace at which a student must progress through his or her educational program to ensure that he will complete the program within the maximum timeframe. If a school permits appeals, the policy must explain that the student may appeal on the basis of: injury or illness, the death of a relative, or other special circumstances.

Noncompliance:

By the end of the Fall 2013 term, **student 32** exceeded the 150% maximum timeframe for her program of study. Yet GGC continued to disburse Title IV aid for the Spring 2014 term. When asked to explain why aid was disbursed, school officials provided documentation of an

approved appeal of SAP. The student's appeal was not based on mitigating circumstances; therefore it is invalid. The student received an ineligible \$6,250 Unsubsidized FDL on January 16, 2014.

Required Action:

The institution must return the student's Spring 2014 FDL in the amount of \$6,250 to the Department. Please provide documentation to show that these funds were returned, and that a \$6,250 downward adjustment was made via the Department's Common Origination & Disbursement (COD) System.

In addition, GGC's response to this report must provide an assurance that this finding will not be repeated in the future.

Finding 3: Verification – Conflicting Applicant Data

Citation:

In accordance with 34 C.F.R. §§ 668.51 – 61, if the Secretary or an institution requests documents or information from an applicant who is selected for verification, the applicant must provide the specified documents. An institution must establish and use written policies and procedures for verifying an applicant's information. These policies and procedures must include—

- The time period an applicant must provide any documentation requested by the institution in accordance with § 668.57;
- The consequences of an applicant's failure to provide the requested documentation within the specified time period;
- The method by which the institution notifies an applicant of the results of verification, if the applicant's Expected Family Contribution (EFC) and award amount changes; and,
- The procedures the institution will follow or will require an applicant to follow in order to correct applicant information determined to be in error.

The Secretary publishes in the FEDERAL REGISTER, notice of the information that an institution and an applicant may be required to verify for each award year. Students who are selected for verification are placed in one of the five following groups. The group determines what applicant data must be verified for the student. Please refer to the Department's *2013–2014 Application and Verification Guide*, for additional information on verification.

Verification Groups:

Standard Verification Group/tracking flag VI: Students in this group must verify the following if they are tax filers:

- adjusted gross income (AGI)
- U.S. income tax paid
- untaxed portions of IRA distributions
- untaxed portions of pensions
- IRA deductions and payments
- tax-exempt interest income
- education credits
- household size
- number in college
- Supplemental Nutrition Assistance Program (SNAP) benefits
- child support paid

Students who are not tax filers must verify the following:

- income earned from work
- household size
- number in college
- SNAP benefits
- child support paid

SNAP Verification Group/tracking flag V2: Students in this group must verify the receipt of SNAP benefits.

Child Support Paid Verification Group/tracking flag V3: Students must verify child support paid by them or their spouse, their parents, or both.

Custom Verification Group/tracking V4: Students must verify high school completion status and identity/statement of educational purpose in addition to receipt of SNAP benefits and payment of child support.

Aggregate Verification Group/tracking flag V5: Students must verify high school completion status and identity/statement of educational purpose in addition to the items in the Standard Verification Group.

Per § 668.57, if an applicant is selected to verify any of the following information, an institution must obtain the specified documentation as follows:

- (a) *AGI, income earned from work, or U.S. income tax paid:* a copy of the income tax return or an Internal Revenue Service (IRS) form that lists tax account information of the applicant, his or her spouse, or his or her parents, as applicable for the specified year. The copy of the return must include the signature (which need not be an original) of the filer of the return or of one of the filers of a joint return.

- (b) *Number of family members in household:* an institution must require a statement signed by both the applicant and one of the applicant's parents if the applicant is a dependent student, or only the applicant if he is an independent student, listing the name and age of each family member in the household and the relationship of that household member to the applicant.
- (c) *Number of family household members enrolled in eligible postsecondary institutions:* an institution must require a signed statement of each family member who is attending an eligible postsecondary educational institution as at least a half-time student in the award year; the age of each student; and the name of the institution that each student is attending.
- (d) *Other information:* if an applicant is selected to verify other information specified in the annual FEDERAL REGISTER notice, he or she must provide the documentation specified for that information in the FEDERAL REGISTER notice.

If an institution has reason to believe that an applicant's information, household size or the number of household members enrolled in a postsecondary institution is inaccurate, it is responsible to obtain further documentation to resolve the conflict.

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

Noncompliance:

Conflicting applicant data was not resolved for two students selected for verification as follows:

Student 19 was selected for verification in the 2013-2014 award year. His ISIR reported his AGI to be \$6,293 with taxes paid as \$3,643, but his IRS tax return showed that his AGI was \$3,643 with \$0 taxes paid. Additionally, the ISIR reported untaxed income of \$1,082 as the student's parent's untaxed pension; however the parental tax return reported no untaxed pension. These discrepancies were not resolved.

Student 26 was selected for verification in the 2013-2014 award year. Her ISIR reported that the number of family members was six but the Verification Worksheet showed the household size as seven. This discrepancy did not appear to be resolved.

Required Action:

The purpose of verification is to ensure that Title IV funds are awarded to student applicants in the correct amount. GGC must improve its procedures to request, receive, and verify applicant data for students selected by the Central Processing System (CPS) each award year.

Corrections to **student 19's** ISIR were made during the week of the program review. As a result, the student will receive additional Pell Grant funds from the current award year. The discrepancy in household size reported for **student 26** was resolved, but did not result in an award change.

GGC must submit an outline of the corrective action it will take in response to this finding.

Finding 4: Unidentified Withdrawal / Return Calculation for Withdrawn Student

Citation:

34 C.F.R. § 668.22 of the Student Assistance General Provisions specifies the treatment of Title IV funds when a recipient withdraws from an institution. The institution must have an accurate system to determine a student's withdrawal date because that date is used to determine the percentage of time completed, therefore, the amount of aid a student earned. The calculation used in determining the unearned amount of funds to be returned to the Department (or to the student) is known as R2T4 (Return of Title IV Funds).

The withdrawal date for a student who officially withdraws or who is withdrawn, is the date as determined by the institution, that the student began the withdrawal process or provided official notification to the institution, in writing or orally, of his or her intent to withdraw.

An institution is required to return unearned funds for which it is responsible as soon as possible, but no later than **45** days from the institution's determination of a student's withdrawal.

Noncompliance:

Student 21 was administratively withdrawn from GGC on November 26, 2013; however, the financial aid office was not notified of the student's withdrawal and an R2T4 calculation was not performed as required. In addition, student 21 did not receive exit loan counseling (see the following finding).

Required Action:

The student attended more than 60% of the term, therefore no funds are due to the Department. However, GGC officials must explain how it will ensure that all applicable administrative

offices are notified upon a student's withdrawal. Failure to do so may result in late returns as well as the institution retaining ineligible or excess Title IV funds.

Please implement a corrective action plan that will address this error, and provide a copy with the institution's response.

Finding 5: Exit Loan Counseling Not Always Documented

Citation:

Before a first-time FDL borrower takes out a loan, an institution must ensure that entrance loan counseling is conducted. In accordance with 34 C.F.R. §685.304, entrance must provide the borrower with comprehensive information on the terms and conditions of the loan and on the responsibilities of the borrower with respect to the loan.

A school must ensure that exit counseling is also conducted with each FDL borrower shortly before the he or she ceases at least half-time study at the school. Exit counseling must be in person, by audiovisual presentation, or by interactive electronic means. In each case, the school must ensure that an individual with expertise in the Title IV programs is reasonably available shortly after the counseling to answer the borrower's questions. If a student withdraws from school without the school's prior knowledge, or fails to complete the counseling as required, exit counseling must be provided either through interactive electronic means or by mailing written counseling materials to the student borrower at his or her last known address within **30** days after learning that the student has withdrawn from school or failed to complete the exit counseling as required.

The exit counseling must:

- Inform the student borrower of the average anticipated monthly repayment amount based on the student borrower's indebtedness or on the average indebtedness of student borrowers who have obtained FDLs at the same school or in the same program of study at the same school;
- Review available repayment plan options;
- Explain to the borrower the options to prepay each loan, to pay each loan on a shorter schedule, and to change repayment plans;
- Provide information on the effects of loan consolidation;
- Include debt-management strategies that are designed to facilitate repayment;
- Explain how to contact the party servicing the borrower's loans;
- Describe the likely consequences of default, including adverse credit reports, delinquent debt collection procedures under Federal law, and litigation;
- Provide a general description of the terms and conditions under which a borrower may obtain full or partial forgiveness or discharge of principal and interest, defer repayment of principal or interest, or be granted forbearance on a title IV loan;

- Review for the student, information on the availability of the Department's Student Loan Ombudsman's office;
- Inform the borrower of the availability of loan information in the National Student Loan Data System (NSLDS) and how NSLDS can be used to obtain title IV loan status information;
- Review a general description of the types of tax benefits that may be available; and,
- Require the student borrower to provide current information concerning name, address, social security number, references, and driver's license number and State of issuance, as well as the student borrower's expected permanent address, the address of the student borrower's next of kin, and the name and address of the student borrower's expected employer (if known).
- If exit counseling is conducted through interactive electronic means, a school must take reasonable steps to ensure that each student borrower receives the counseling materials, and participates in and completes the exit counseling.
- The school must maintain documentation substantiating the school's compliance with this section for each student borrower.

Noncompliance:

The institution could not document that exit loan counseling was completed unless the student replied electronically to the school's reminder to complete counseling. For example, officials could not confirm exit loan counseling for **students 6, 9, 21 and 24**. In addition, an exit loan counseling packet/on-line reminder should have been sent in February of 2013 for **student 5** but was not sent until April of 2013.

Required Action:

GGC must review exit loan counseling materials and procedures to ensure timely and thorough counseling for all FDL borrowers. A school must be able to document that it has attempted to contact borrowers and inform them of their loan responsibilities.

GGC's response to this finding must provide an assurance that loan counseling is conducted for all borrowers under the Title IV programs.

Finding 6: Late Enrollment Reporting to the National Student Loan Data System

Citation:

As noted in 34 C.F.R. § 685.309, schools are required to confirm and report the enrollment status of Title IV student aid recipients to the Department's NSLDS. This process is called Enrollment Reporting (or the Student Status Confirmation Report [SSCR]). One of the important functions of NSLDS is to maintain the enrollment status of Title IV recipients. The accuracy of enrollment reporting by schools is critical for many reasons, including ensuring that the obligations and benefits that the HEA provides for Title IV student loan

recipients are respected. NSLDS enrollment information is also used by the Department for a variety of other purposes, including tracking interest subsidy payments; budget allocations; and the evaluation of the Title IV programs.

The accuracy of Title IV student loan records depends on the accuracy of enrollment information reported by schools. Schools must review, update, and verify student enrollment statuses; effective dates of the enrollment status; and; the anticipated completion dates that appear on the Enrollment Reporting roster file or on the Enrollment Maintenance page of the NSLDS Web site. The 'Certification Date' is the date a school certified the enrollment information.

An institution must have administrative and fiscal controls to timely report data. Upon receipt of an Enrollment Reporting roster file, the institution must complete and return that file to NSLDS within 30 days from the date the roster file was created. However, if a roster file is expected within 60 days (often referred to as batch reporting), a school may provide the updated data on that roster file. Title IV institutions must:

- Recertify enrollment status of all students on the enrollment roster even if there is no change in enrollment status.
- Provide completion/graduation data accurately and timely when students complete their academic program.
- Accurately and timely report students with a less than half-time enrollment status.
- Add transfer students who have received Title IV aid elsewhere to their enrollment roster even if the students are not receiving aid at your school.
- Provide an Anticipated Completion Date (ACD) for students.

Please refer to the Department's Dear Colleague Letter (DCL-GEN-12-06, March 30, 2012) for additional requirements regarding NSLDS Enrollment Reporting.

Noncompliance:

The 'Certification Date' of enrollment status as reported in NSLDS for **students 3-11; 13; 15-16; 18; 20-23; 25-29; and, 31-34** was up to several months late.

Required Action:

Title IV schools are ultimately responsible for timely and accurate reporting, even when they use an enrollment reporting servicer to submit Enrollment Reporting files. Schools may perform internal oversight or may receive a request for an audit history of Enrollment Reporting. Also, NSLDS provides tools for a school to monitor certification records that have been provided to NSLDS by the school or its servicer. Schools that do not comply may have their eligibility for Title IV aid revoked, or they may have fines imposed.

GGC must ascertain why 'Certification Dates' provided to the National Student Clearinghouse and/or NSLDS do not appear as timely in NSLDS. Please submit a response to explain how a correction will be made in order to ensure that student enrollment data is timely reported to NSLDS in the future.

Finding 7: Community Service Requirement Not Met for FWS Program

Citation:

Under the Federal Work Study (FWS) program regulations (34 C.F.R. § 675.18 [g]), an institution must use at least 7% of the sum of its initial and supplemental FWS allocations for an award year to compensate students employed in community service activities. In meeting this community service requirement, an institution must include at least one—

- Reading tutoring project that employs one or more FWS students as reading tutors for children who are preschool age or are in elementary school; or
- Family literacy project that employs one or more FWS students in family literacy activities.

The Secretary may waive this requirement if the Secretary determines that an institution has demonstrated that enforcing it would cause a hardship for students at the institution.

Noncompliance:

Based on GGC's 2012-2013 FWS authorization, the institution should have spent \$7,000 for community service jobs; however only \$4,191 was spent in 2012-2013 to employ two students in these positions.

Required Action:

GGC returned the difference between the amount it should have spent for community service and the amount it actually spent. On December 15, 2013, GGC returned \$2,809 to the Department.

The Department's March 18, 2013 Electronic Announcement reminds schools that are not compliant with the FWS community service requirements may be subject to a Limitation, Suspension, and Termination (L, S, & T) proceeding, through which the school could be denied future participation in the FWS Program, and possibly other Title IV programs, and/or subject to a substantial fine.

GGC currently employs FWS recipients in community service positions and is on track to meet all requirements for the award year; therefore, no further action is required for this finding.