



November 25, 2013

Wildolfo Arvelo  
President  
Great Bay Community College  
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Portsmouth, NH 03801-2807

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RE: **Final Program Review Determination**  
OPE ID: 002583  
PRCN: 201120127443

Dear President Arvelo:

The U.S. Department of Education's (Department's) School Participation Division – New York/Boston issued a program review report on February 6, 2012 covering Great Bay Community College's (GBCC) 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 2009/2010 and 2010/2011 award years. The institution's final response was dated March 9, 2012.

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

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

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

If you have any questions please call Shari Mecca at (646) 428-3757.

Sincerely,

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

Betty Coughlin  
Director

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

cc: Elizabeth Hamlin, Financial Aid Administrator  
New Hampshire Department of Education, Division of Higher Education  
New England Association of Schools and College – CHE (Higher Educ)

**Federal Student Aid**

AN OFFICE of the U.S. DEPARTMENT of EDUCATION  
New York/Boston School Participation Division

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OPE ID 002583  
PRCN 201120127443

Prepared by  
U.S. Department of Education  
Federal Student Aid  
School Participation Division-New York/Boston

# Final Program Review Determination

November 25, 2013

New York/Boston School Participation Division  
5 Post Office Square, 9<sup>th</sup> Floor, Suite 950-A, Boston, MA 02109-3921  
[StudentAid.gov](http://StudentAid.gov)

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## **B. Scope of Review**

The U.S. Department of Education (Department) conducted a program review at Great Bay Community College (GBCC) from March 7, 2011 to March 11, 2011. The review was conducted by Lonny Meloon and James McDonagh.

The focus of the review was Return to Title IV (R2T4), Cost of Attendance, Institutional Student Information Report (ISIR) data, and Verification. The review consisted of, but was not limited to, an examination of GBCC's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, student account ledgers, fiscal records, and system data.

A sample of 30 files was identified for review from the 2009/2010 and 2010/2011 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 partial social security numbers of the students whose files were examined during the program review. A program review report (PRR) was issued on February 6, 2012.

### **Disclaimer:**

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

## **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 GBCC to bring operations of the financial aid programs into compliance with the statutes and regulations.

### **Resolved Findings**

#### **Findings 1 and 4**

GBCC has taken the corrective actions necessary to resolve Findings 1 and 4 of the program review report. Therefore, these findings may be considered closed. GBCC's written response related to the resolved findings can be found in Appendix C.

### **Resolved Findings with Comments**

The following program review findings have been resolved by the institution, and may be considered closed. These findings are included solely for the purpose of discussing resolution of the finding.

#### **Finding 2. Overaward**

**Citation Summary:** *A school may not certify a Stafford or PLUS loan, or a combination of loans, for a loan amount that:*

1. *The school has reason to know would result in the borrower exceeding the annual or maximum loan amounts in 34 C.F.R. §682.204; or*
2. *Exceeds the student's estimated cost of attendance for the period of enrollment, less*
  - i. *The student's estimated financial assistance for that period; and*
  - ii. *In the case of a Subsidized Stafford loan, the borrower's expected family contribution for that period.*

34 C.F.R. §682.603(e)

**Noncompliance Summary:** *GBCC awarded Student 8 need-based aid in excess of the student's unmet need. Student 8's unmet need was \$218.00 based on the award maintenance screen, yet GBCC awarded the student a FFEL Subsidized Stafford loan for \$1,750.00 causing an overaward of \$1,532.00.*

**Required Action Summary:** *GBCC was required to explain the corrective action it would take to ensure that it does not overaward Title IV aid. Since Student 8 received Title IV aid in excess of financial need, GBCC was informed that it would be required to return the overaward based on instructions provided in the Final Program Review Determination.*

**GBCC's Response:** *GBCC indicated that Student 8's overaward was actually \$218.00. Student 8's unmet need was \$1,532.00 before the disbursement of the FFEL Subsidized Stafford loan of \$1,750.00. GBCC plans to exchange \$218.00 in FFEL Subsidized Stafford loan funds for FFEL Unsubsidized Stafford loan funds upon instructions from the Department.*

*GBCC provided the student's Banner award screen in its response to the program review report. GBCC stated that the overaward was an error of management oversight, possibly due to the inexperience of the recently hired Financial Aid Director. GBCC indicated that it has a procedure in place (RORCALC in Banner) to review for overawards. At the beginning of each semester the report is run weekly, then later in the semester bi-weekly, to identify potentially overawarded students. Overawards are corrected as they appear on the RORCALC report.*

*The current financial aid staff has been in place two and one-half years and has received extensive training and system oversight.*

**Final Determination:** *GBCC is not required to perform any further action for this finding in regards to Student 8 because the student's FFEL Subsidized and Unsubsidized Stafford loans for the 2009/2010 award year have been repaid in full effective June 11, 2010.*

### **Finding 3. Failure to Property Document Exit Counseling**

**Citation Summary:** *A school must ensure that exit counseling is conducted with each Stafford loan borrower either in person, by audiovisual presentation, or by interactive electronic means. In each case, the school must ensure that this counseling is conducted shortly before the student borrower ceases at least half-time study at the school, and that an individual with expertise in the Title IV programs is reasonably available shortly after the counseling to answer any student borrower's questions. As an alternative, in the case of a student borrower enrolled in a correspondence program or a study-abroad program that the home institution approved for credit, written counseling materials may be provided by mail within 30 days after the student borrower completes the program. If a student borrower withdraws from school without the school's prior knowledge or fails to complete an exit counseling session as required, the school must ensure that exit counseling is provided through either interactive electronic means or by mailing written counseling materials to the student borrower at the student borrower's last known address within 30 days after learning that the student borrower has withdrawn from school or failed to complete the exit counseling as required. 34 C.F.R. §682.604(g)(1)*

*34 C.F.R. §682.604(g)(2) further details the information that must be included in the exit counseling materials. 34 C.F.R. §682.604(g)(4) states that a school must maintain documentation substantiating the school's compliance with this section for each student borrower.*

**Noncompliance Summary:** *GBCC was unable to provide documentation to support that it conducted the required exit counseling for Students 2, 3, 5, 7, 8, 9, 11, 18, and 25.*

**Required Action Summary:** *GBCC was required to develop and implement procedures and internal controls to ensure that exit counseling documentation is distributed, completed by each student, and retained in each student's file. GBCC was required to include a copy of its revised procedures and internal controls with the response to the program review report.*

*In addition, GBCC was required to provide documentation which demonstrates that the students cited in this finding have completed exit counseling or have been mailed exit counseling materials.*

**GBCC's Response:** GBCC provided evidence that exit counseling materials were mailed to Students 3, 5, 7, 9, and 25 on March 14, 2011.

GBCC provided evidence that Student 8 was sent an exit counseling letter on December 17, 2009 and subsequently completed the exit counseling through Mapping Your Future on January 14, 2010.

GBCC indicated that Students 2 and 18 were enrolled in both semesters for the 2009/2010 and 2010/2011 award years and were enrolled at the time of the review. Therefore, exit counseling had not been required.

GBCC indicated that Student 11 was not required to have exit counseling performed because she did not borrow any loans while attending GBCC.

GBCC's policy regarding exiting students is to notify students of the exit counseling requirement and to refer students to online counseling. In the same mailing, GBCC provides the alternative of a paper exit interview for students to complete and return. GBCC does not follow-up with each student.

GBCC had a reporting extract issue at the time of the Program Review which has been corrected so that all exiting students are now identified and properly exited in a timely fashion. Of the nine students listed in the Program Review Report, only 5 were issues as explained above.

**Final Determination:** GBCC has provided the required documentation which demonstrates that exit counseling materials were sent to the students for whom it was required. GBCC has also provided the reasons why the other students were not required to have exit counseling performed. The Department agrees with GBCC's determination that as of the date of the on-site program review, Students 2, 11, and 18 were not required to have had exit counseling completed. Student 2 was still enrolled at GBCC until she graduated on May 10, 2012. Student 11 did not receive a Title IV student loan while in attendance at GBCC. Student 18 was still enrolled at GBCC until she withdrew May 12, 2011 and subsequently re-enrolled on August 29, 2011 and graduated on May 9, 2013.

GBCC also provided the required updated policies and procedures.