January 15, 2013

Mr. Thomas J. Snyder
President
Ivy Tech Community College of Indiana
50 West Falls Creek Parkway
North Drive
Indianapolis, IN 46208-1763

Certified Mail
Return Receipt Requested
7012 1640 0000 0215 9334

RE: **Expedited Final Program Review Determination Letter**
OPE ID: 00991700
PRCN: 2013-105-28142

Dear Mr. Snyder:

From December 3, 2012 through December 7, 2012, Gigi Moore and Stefanie Tucker conducted a review of Ivy Tech Community College of Indiana's (Ivy Tech) administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). The purpose of this Final Program Review Determination Letter is to close the program review.

The focus of the review was to determine Ivy Tech'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 Ivy Tech'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 were identified for review from the 2011-2012 and 2012-2013 (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. Also, 1 additional file was selected based on a need to include an additional R2T4 student. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review.

**Protection of Personally Identifiable Information (PII):**
PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information.

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

The Chicago/Denver School Participation Team has made a Final Program Review Determination concerning the findings that were identified during the program review. Following is a discussion of the findings identified and the resolution of those findings.

**Program Findings and Final Program Review Determinations:**

**Finding 1: Bank Accounts Not Identified with "Federal Funds"**

**Citation:**

An institution must demonstrate adequate maintenance of accounts and funds as prescribed in 34 C.F.R. § 668.16e(a)(1)(2)(i).

An institution must maintain Title IV, HEA program funds in a bank or investment account that is Federally insured or secured by collateral of value reasonably equivalent to the amount of those funds.

(2) For each bank or investment account that includes Title IV, HEA program funds, an institution must clearly identify that Title IV, HEA program funds are maintained in that account by—

(i) Including in the name of each account the phrase "Federal Funds".

**Noncompliance:**

During Ivy Tech's program review, the reviewers noted that the institution did not identify its federal accounts that include Title IV HEA funds with the term "Federal Funds".

**Institutional Action Taken to Resolve Noncompliance:**

Ivy Tech provided documentation while the reviewers were on site that the corrections to the bank accounts were resolved.

Ivy Tech provided a Corporate Deposit Account Detail dated December 7, 2007 from their financial institution (PNC Bank), which indicates that the accounts held by the financial institution for Ivy Tech has been changed to properly reflect the federal funds designation.

**Final Program Review Determination:**

Ivy Tech has taken the corrective actions necessary to resolve this finding. Therefore, Ivy Tech may consider this finding closed with no further action required.

**Record Retention:**

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

We would like to express our appreciation for the courtesy and cooperation extended during the review. If you have any questions concerning this report, please call Gigi Moore at (312) 730-1511.

Sincerely,

(b)(6)

Douglas Parrott
Division Director

cc: Ben Burton, Financial Aid Administrator
IN Commission for Higher Education
North Central Association of Colleges and Schools - CIHE (Higher Education)

## Appendix A: Student Sample

### 2011-2012

| | Student's Name | Student's SSN (last four digits only) |
|---|---|---|
| 1. | (b)(6); (b)(7(C) | |
| 2. | | |
| 3. | | |
| 4. | | |
| 5. | | |
| 6. | | |
| 7. | | |
| 8. | | |
| 9. | | |
| 10. | | |
| 11. | | |
| 12. | | |
| 13. | | |
| 14. | | |
| 15. | | |

### 2012-2013

| | Student's Name | Student's SSN (last four digits only) |
|---|---|---|
| 16. | (b)(6); (b)(7(C) | |
| 17. | | |
| 18. | | |
| 19. | | |
| 20. | | |
| 21. | | |
| 22. | | |
| 23. | | |
| 24. | | |
| 25. | | |
| 26. | | |
| 27. | | |
| 28. | | |
| 29. | | |
| 30. | | |

Student(s) Tested for R2T4

| | Student's Name | Student's SSN (last four digits only) |
|---|---|---|
| 31. | (b)(6); (b)(7(C) | |