



July 1, 2015

Mr. Larry Van Loon  
President  
Lawyer's Assistant School of Dallas  
8150 North Central Expressway, Suite M2240  
Dallas, TX 75206-1815

Certified Mail  
Return Receipt Requested  
7012 3460 0003 2479 4817

RE: **Final Program Review Determination**  
OPE ID: 04168700  
PRCN: 201510628869

Dear Mr. Van Loon:

The U.S. Department of Education's (Department's) Dallas School Participation Division issued a program review report on January 23, 2015, covering Lawyer's Assistant School of Dallas's (LASD's) 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 2013-2014 and 2014-2015 award years. LASD's final response was received on February 20, 2015. A copy of the program review report (and related attachments) and LASD's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by LASD 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 close the review.

This FPRD contains one or more findings regarding LASD's failure to comply with the requirements of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the Clery Act) in Section 485(f) of the HEA, 20 U.S.C. § 1092(f), and the Department's regulations in 34 C.F.R. §§ 668.41 and 668.46. Since a Clery Act finding does not result in a financial liability, such a finding may not be appealed.

LASD's responses have resolved all other findings. In addition LASD has provided assurances that the appropriate corrective actions have been taken to resolve and prevent future occurrences of all findings.

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

Dallas School Participation Division  
1999 Bryan Street, Suite 1410, Dallas, TX 75201-6817  
StudentAid.gov

**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 Mr. Bruce Anderson at (214) 661-9470.

Sincerely,



Cynthia Thornton, Director  
Dallas School Participation Division

Enclosure:

Final Program Review Determination Report (and appendices)

cc: Lindsay Jacobs, Financial Aid Director  
Texas Workforce Commission – Career Schools and Veterans Education  
Accrediting Council for Independent Colleges and Schools  
Department of Defense  
Department of Veterans Affairs  
Consumer Financial Protection Board

Prepared for  
**Lawyer's Assistant School of  
Dallas**

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

## Final Program Review Determination July 1, 2015

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**A. Institutional Information**

Lawyer's Assistant School of Dallas  
8150 North Central Expressway, Suite M2240  
Dallas, TX 75206-1815

Type: Proprietary

Highest Level of Offering: Non-degree 1 year

Accrediting Agency: Accrediting Council for Independent Colleges and Schools

Current Student Enrollment: 56 (2012-13 award year)

% of Students Receiving Title IV: 96% (2012-13 award year)

Title IV Participation (as reported in G5, the Department's grants management system)

	<u>2012-2013 Award Year</u>
Federal Pell Grant Program (Pell)	\$154,513
William D. Ford Federal Direct Loan Program (Direct Loan)	\$108,909

Default Rate DL:     2011 - 5.5%  
                              2010 - 0%  
                              2009 - 0%

## **B. Scope of Review**

The U.S. Department of Education (the Department) conducted a program review at Lawyer's Assistant School of Dallas (LASD) from December 1, 2014, to December 5, 2014. The review was conducted by Mr. Bruce Anderson, Ms. Crystal Brennan, and Mr. Jonathan Hemmila.

The focus of the review was to determine LASD's compliance with the statutes and federal regulations as they pertain to the institution's administration of the Title IV programs. The review consisted of, but was not limited to, an examination of LASD'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 2013-2014 and 2014-2015 (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. A program review report was issued on January 23, 2015.

### **Disclaimer:**

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

## **C. Finding and Final Determination**

### **Resolved Findings**

LASD has taken the corrective actions necessary to resolve findings 2 through 5 of the program review report. Therefore, these findings may be considered closed. Please refer to Appendix A for a discussion of these findings. The finding requiring further action by LASD is discussed below.

### **Finding with Final Determination**

The program review report finding requiring further action is summarized below. At the conclusion of the finding is a summary of LASD's response to the finding, and the Department's final determination for that finding. A copy of the program review report issued on January 23, 2015, is attached as Appendix A – Program Review Report.

**Finding 1. Crime Awareness Requirements Not Met – Reporting Discrepancies in Crime Statistics Published in the Annual Security Report and those Reported to the Department's Campus Crime Statistics Database**

**Citation Summary:** The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (*Clery Act*) and the Department's regulations require that all institutions that receive Title IV, HEA funds must, by October 1 of each year, publish and distribute to its current students and employees through appropriate publications and mailing, a comprehensive Annual Security Report (ASR) that contains, at a minimum, all of the statistical and policy elements described in 34 C.F.R. § 668.46(b). The ASR must: be prepared and actively distributed as a single document; must include statistics for incidents of crimes reported during the three most recent calendar years; must include various policy statements; and institutions must submit crime statistics to the Secretary for inclusion in the "Campus Safety and Security Data Analysis Cutting Tool" (CSSDACT).

**Noncompliance Summary:** While LASD did submit accurate data to the CSSDACT, it did not publish accurate crime statistics in its 2013 ASR.

**Required Action Summary:** LASD was required to review and improve its existing internal policies, procedures, internal controls, and training programs to ensure that all crime statistics are disclosed accurately and completely, both in its ASR and in its data submission to the Department's CSSDACT. In addition, LASD was required to develop and implement any new policies and procedures that are needed to ensure that all of LASD's campus security operations will be carried out in accordance with the *Clery Act* going forward. As part of this internal review, LASD was required to review the crime statistics that were included in the LASD ASR and its corresponding CSSDACT data submission as well as those statistics that will be published in any future ASR and CSSDACT submission and verify that all statistics are accurate and complete.

**LASD's Response:** In its official response dated February 20, 2015, the institution concurred with the finding and described the steps taken to address the deficiencies. LASD officials stated that they contacted the Department's Helpdesk to inquire about how to disclose statistics for certain incidents of crime that were reported to local law enforcement agencies. The Department's Helpdesk advised them that the crimes they reported in the ASR did not take place on any part of the institution's Clery Geography. Therefore, LASD claimed that it over-reported crimes for calendar years 2011 and 2012 and that this inaccurate data was included in the 2013 ASR. LASD also asserted that these errors were corrected and that revised campus crime information was provided to its students and employees. Finally, LASD provided assurances that it has a clearer understanding of the requirements of the *Clery Act* and that future ASRs will be accurate and complete and will be distributed timely.

**Final Determination:** Finding #1 of the program review report cited LASD for not publishing accurate crime statistics in the 2013 ASR. Specifically, LASD's report indicated that 11 serious felonies occurred on adjacent and accessible public property during 2011 and 2012; however, the institution disclosed zero offenses during those years in its submissions to the CSSDACT.

As a result of these violations, LASD was required to review the crime statistics that were included in the LASD's ASR and its corresponding CSSDACT data submission as well as those statistics that will be published in any future ASR and CSSDACT submission and verify that all statistics are accurate and complete. As part of this process, the institution was required to contact the Department's Helpdesk to facilitate the required corrections. As a result of that consultation, LASD discovered that they had in fact over-reported crimes for calendar years 2011 and 2012 and that the information reported to CSSDACT was in fact correct.

Because the reporting errors in question resulted in the over-reporting of crime statistics the Department did not find that a substantial misrepresentation occurred. Corrective action was initiated quickly and the institution claimed that additional program improvements were incorporated that will ensure that future ASR reports will be accurate.

The Department carefully examined LASD's narrative response and supporting documentation. Based on that review and the institution's admission of noncompliance, the violation identified in the finding is sustained. The review team's examination also showed that the violation in question was satisfactorily addressed, for the most part, by the institution's timely response and diligent efforts to diagnose and resolve the discrepancies. As such, the Department determined that LASD's remedial action plan and new and revised policies and procedures meet minimum requirements. For these reasons, the Department has accepted LASD's response and considers this finding to be closed for the purposes of this program review. Nevertheless, the officers and directors of LASD are on notice that the University must take any additional actions that may be needed to address any other deficiencies and weaknesses that were detected in its crime statistics compilation and disclosure processes and in its overall campus safety and crime prevention program to ensure that this violation does not recur and to prevent similar violations from occurring in the future.

Although the finding is now closed, LASD is reminded that the exceptions identified above constitute violations of the *Clery Act* that by their nature cannot be cured. There is no way to truly "correct" violations of this type once they occur. The requirement to compile and disclose accurate and complete campus crime statistics is fundamental to the goals of the *Clery Act*. LASD asserted that it has taken adequate remedial actions and is now in compliance with the *Clery Act* as required by its Program Participation Agreement. In general, an institution's remedial actions cannot and do not diminish the seriousness of a *Clery Act* violation. In addition, such actions do not as a general rule,

reduce the likelihood that the Department will impose an adverse administrative action and/or require additional corrective actions as a result. However, the Department takes note that the effect of these specific exceptions resulted in an overstatement of the LASD's crime statistics. The Department has consistently emphasized the importance of disclosing accurate and complete crime statistics. While any inaccuracy is a concern, underreporting of crimes is more likely to cause students, parents, employees, and other stakeholders to have a false sense of security. As such, underreporting triggers a special regulatory concern for the Department. In light of the specific facts of this case, an adverse administrative action will not be recommended.

In light of the potential consequences of *Clery Act* compliance failures, the Department strongly recommends that LASD re-examine its campus safety and general Title IV policies and procedures on an annual basis to ensure that they continue to reflect current institutional practices and are compliant with Federal regulations. As part of these reviews, LASD officials are encouraged to consult the Department's "Handbook for Campus Safety and Security Reporting" (2011) as a reference guide for *Clery Act* compliance. The Handbook is online at: [www2.ed.gov/admins/lead/safety/handbook.pdf](http://www2.ed.gov/admins/lead/safety/handbook.pdf). The Department also provides a number of other *Clery Act* training resources. LASD officials can access these materials at: [www2.ed.gov/admins/lead/safety/campus.html](http://www2.ed.gov/admins/lead/safety/campus.html). The regulations governing the *Clery Act* can be found at 34 C.F.R. §§668.14, 668.41, 668.46, and 668.49.

LASD management is also reminded that Section 304 of the Violence Against Women Reauthorization Act of 2013 (VAWA) amended the *Clery Act* to require institutions to compile and disclose statistics for incidents of sexual assault, dating violence, domestic violence, and stalking. VAWA also requires institutions to include new policy, procedural, and programmatic disclosures regarding sexual assault prevention and response in their ASRs. All institutions are currently obligated to make a documented good-faith effort to comply with the statutory requirements of VAWA and were obligated to include all new required content in the 2014 ASR. The Department issued Final Rules on the VAWA amendments on October 20, 2014 and therefore, these regulations will go into effect on July 1, 2015, per the Department's Master Calendar. LASD officials may access the text of the Final Rule at:

<http://ifap.ed.gov/fregisters/attachments/FR102014FinalRuleViolenceAgainstWomenAct.pdf>.

Finally, LASD officials are advised to review the accuracy and completeness of its Drug and Alcohol Abuse Prevention Program (DAAPP) as required by the *DFSCA* and the Department's Part 86 Regulations. FSA is now responsible for monitoring compliance with the *DFSCA*. Therefore, it is essential that the University continue to develop its DAAPP, actively distributes accurate and complete program materials to members of the campus community, and conducts comprehensive biennial reviews on the required schedule. LASD's biennial review reports must include substantive information about the research methods used and outcomes reached during the review. Care must also be taken to ensure that all findings and recommendations are supported by valid evidence.

Finally, the report must indicate that it was approved by the Institution's President and/or its board. For assistance or more information about the *Clery Act* and/or the *DFSCA*, please contact the Dallas School Participation Division.

**D. Appendices**

**Appendix A – Program Review Report**

**Appendix B – Institutional Response**

Final Program Review Determination  
PRCN #: 201510628869

Appendix A  
Program Review Report

Prepared for

Lawyer's Assistant School of  
Dallas

**Federal Student Aid**  
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OPE ID 04168700  
PRCN 201510628869

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

## Program Review Report

January 23, 2015

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**A. Institutional Information**

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## **B. Scope of Review**

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The focus of the review was to determine LASD'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 LASD'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 2013-2014 and 2014-2015 (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 (provided to the school on site) 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 LASD'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 LASD 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 LASD to bring operations of the financial aid programs into compliance with the statutes and regulations.

**Finding 1. Crime Awareness Requirements Not Met – Reporting Discrepancies in Crime Statistics Published in the Annual Security Report and those Reported to the Department's Campus Crime Statistics Database**

**Citation:** The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (*Clery Act*) and the Department's regulations require that all institutions that receive Title IV, HEA funds must, by October 1 of each year, publish and distribute to its current students and employees through appropriate publications and mailing, a comprehensive Annual Security Report (ASR) that contains, at a minimum, all of the statistical and policy elements described in *34 C.F.R. § 668.46(b)*.

The ASR must be prepared and actively distributed as a single document. Acceptable means of delivery include U.S. Mail, hand delivery, or campus mail distribution to the individual or posting on the institution's website. If an institution chooses to distribute its report by posting to an internet or intranet site, the institution must, by October 1 of each year, distribute a notice to all students and employees that includes a statement of the report's availability and its exact electronic address, a description of its contents, as well as an advisement that a paper copy will be provided upon request. *34 C.F.R. § 668.41(e) (1)*

The Department's regulations also require participating institutions to provide a notice to all prospective students and employees that includes a statement about the ASR's availability, its contents, and its exact electronic address if posted to a website. This notice must also advise interested parties of their right to request a paper copy of the ASR and to have it furnished upon request. *34 C.F.R. § 668.41(e) (4)*

Specifically, the *Clery Act* and the Department's regulations require institutions to include statistics for incidents of crimes reported during the three most recent calendar years. The covered categories include criminal homicide (murder and non-negligent manslaughter), forcible and non-forcible sex offenses, robbery, aggravated assaults, burglary, motor vehicle theft, and arson. Statistics for certain hate crimes as well as arrest and disciplinary referral statistics for violations of certain laws pertaining to illegal drugs; illegal usage of controlled substances, liquor, and weapons also must be disclosed in the ASR. These crime statistics must be published for the following geographical categories: 1) on campus; 2) on-campus student residential facilities; 3) certain non-campus buildings and property; and, 4) certain adjacent and accessible public property. *34 C.F.R. § 668.46(c) (1)*

The ASR must include several policy statements. These disclosures are intended to inform the campus community about the institution's security policies, procedures, and the availability of programs and resources as well as channels for victims of crime to seek recourse. In general, these policies include topics such as the law enforcement authority and practices of campus police and security forces, incident reporting procedures for students and employees, and policies that govern the preparation of the report itself. Institutions are also required to disclose alcohol and drug policies and educational programs. Policies pertaining to sexual assault education, prevention, and adjudication must also be disclosed. Institutions also must provide detailed policies of the issuance of timely warnings, emergency notifications, and evacuation procedures. All required statistics and policies must be included in a single comprehensive document, known as an ASR. With the exception of certain drug and alcohol program information, cross referencing to other publications is not sufficient to meet the publication and distribution requirements of the Act. § 485(f) of the HEA; 34 C.F.R. § 668.46(b).

Finally, each institution must also submit its crime statistics to the Secretary for inclusion in the Department's online campus crime statistics database called the "Campus Safety and Security Data Analysis Cutting Tool." 34 C.F.R. § 668.41(e) (5)

**Noncompliance:** While LASD did compile and publish accurate and complete crime statistics in the 2013 ASR, the institution submitted inaccurate data to the Department's online campus crime statistics database, also known as the "Campus Safety and Security Data Analysis Cutting Tool (CSSDACT)." This finding is based on the fact that the crime statistics that LASD submitted to the Department did not match those that were published in LASD's campus crime statistics section of the LASD school catalog, meaning that one or both data sets were flawed. An institution must identify and resolve all data discrepancies before the ASR is published and the annual statistical survey are locked. An institution's campus crime statistics must be fully reconciled and accurately disclosed in the ASR and the CSSDACT. The review team compared the crime statistics in the LASD ASR to those that were submitted to the CSSDACT and identified the following discrepancies:

**Crime Statistics - Public Property**

Year	Category	Number Reported on ASR	Number Reported to OPE
2011	Robbery	1	0
2011	Burglary	3	0
2011	Motor Vehicle Theft	2	0
2012	Motor Vehicle Theft	5	0

Any failure to disclose accurate and complete crime statistics in the ASR and accurately submit them to the CSSDACT violates the *Clery Act*. Such discrepancies an institution's crime statistics confuses users of the ASR and the Department's online campus crime statistics database and deprives the campus community and the public of important campus crime information.

**Required Action:** As a result of this violation, LASD is required to review and improve its existing internal policies, procedures, internal controls, and training programs to ensure that all crime statistics are disclosed accurately and completely, both in its ASR and in its data submission to the Department's CSSDACT. In addition, LASD must develop and implement any new policies and procedures that are needed to ensure that all of LASD's campus security operations will be carried out in accordance with the *Clery Act* going forward. As part of this internal review, LASD must review the crime statistics that were included in the LASD ASR and its corresponding CSSDACT data submission as well as those statistics that will be published in any future ASR and CSSDACT submission and verify that all statistics are accurate and complete. If additional reporting errors are identified during this internal review, LASD must take immediate action to correct those data discrepancies by amending its ASR or its CSSDACT data submission. Finally, LASD must submit a copy of all of its new and revised policies and procedures as well as a list of any additional statistical discrepancies that were identified during the internal review with its response to this program review report.

If it is determined during the course of the internal review that the CSSDACT data is correct and that the ASR data is in fact incorrect, then using the policies as a guide, LASD must prepare and publish an accurate and complete ASR that includes all of the statistical disclosures and policy, procedure and programmatic information required under 34 C.F.R. § 668.46(b). A copy of the revised Annual Security Report must be provided with the institution's response to this program review report.

Once the new ASR is evaluated by the review team for accuracy and completeness, The School will be required to actively distribute the ASR to all current students and employees in accordance with 34 C.F.R. § 668.41(e). Finally, the institution will also be required to provide documentation to the Department evidencing the distribution as well as a statement of certification attesting to the fact that the materials were distributed in accordance with the *Clery Act*. This certification must also affirm that Lawyer's Assistant School of Dallas understands its *Clery Act* obligations and that it has taken all necessary corrective actions to ensure that this violation does not recur.

As noted above, the exceptions identified in this finding constitute serious violations of the *Clery Act* that by their nature cannot be cured. There is no way to truly "correct" a violation of this type once it occurs. LASD will be given an opportunity to publish and distribute accurate and complete campus crime statistics and in doing so, will begin to bring its overall campus safety program into compliance with the *Clery Act* as required by its Program Participation Agreement (PPA). Nevertheless, LASD is advised that these remedial measures cannot and do not diminish the seriousness of this violation nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective measures as a result.

Based on an evaluation of all available information including LASD's response, the Department will determine if additional actions will be required and will advise LASD accordingly in the FPRD.

## **Finding 2. Leave of Absence Deficiency**

**Citation:** An institution does not have to treat a leave of absence (LOA) as a withdrawal if it is an approved LOA. A LOA is an approved LOA if the institution has a formal policy regarding LOA's, the student followed the institution's policy in requesting the LOA, and the institution determines that there is a reasonable expectation that the student will return to the institution. If a student does not resume attendance at the institution on or before the leave, the institution must treat the student as a withdrawal. *34 C.F.R. § 668.22(d)*

An institution may not credit a student's account or release the proceeds of a loan to a student who is on LOA. *34 C.F.R. § 685.303(b)*

An institution that grants a student a LOA must, in NSLDS Enrollment Reporting, report the student with a status of "A" (Approved Leave of Absence). *34 C.F.R. § 685.309(b)*

**Noncompliance:** LASD was not in compliance with federal requirements regarding disbursement of loans to a student on a LOA for the student # 26. According to the student ledger, this student was disbursed a subsidized Direct Loan disbursement for \$1,732 and an unsubsidized Direct Loan disbursement for \$2,968 on 10/28/2014. The student was on an approved LOA from 10/27/2014 through 1/5/2015. In addition, the enrollment status in NSLDS was not appropriately updated for students #26 and #28.

**Required Action:** The institution must not disburse loans to a student on a LOA. If student #26 returned from her LOA as scheduled, no further action is necessary. In the future, LASD must ensure it is in compliance with Federal regulations, and must not disburse loan funds to a student that is on an approved LOA.

In addition, LASD must review all students who are currently on an approved LOA and update NSLDS Enrollment Reporting appropriately. Upon return from the LOA, the NSLDS status must again be updated to reflect their correct enrollment status as of their return.

## **Finding 3. Return to Title IV (R2T4) Made Late**

**Citation:** An institution is required to return funds to the applicable Title IV, HEA program when a recipient withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance. A return must be calculated within 30 days of the date of determination of a withdrawal and the return must be paid to the applicable Title IV, HEA program as soon as possible, but no later than 45 days after the date of determination that the student withdrew. *34 C.F.R. § 668.22*

**Noncompliance:** During the review of file for student #12, it was determined that LASD did not properly follow Title IV, HEA regulations regarding the timing of the calculation of the return as well as the return of program funds. LASD determined the withdrawal date to be August 19, 2014, but the calculation was not performed until September 19, 2014, which is 31 days after the date of determination. Further, the R2T4 calculation determined that LASD was required to

return \$733.05 in unsubsidized loan funds back to the federal account. However, the return did not occur until November 24, 2014, 97 days after the school's date of determination.

**Required Action:** Since this appears to be an isolated incidence and the funds were returned, no further action is required.

#### **Finding 4. Verification Violation**

**Citation:** The Student Assistance General Provisions regulations have incorporated a verification process as a part of the Title IV, HEA financial aid program requirements. Verification is required to determine the accuracy of the information submitted by applicants for need-based financial assistance. An institution is responsible for verifying the information used to calculate an applicant's Expected Family Contribution (EFC) as part of the determination of need for student financial assistance. The regulations also require an institution to verify discrepancies in information received from different sources regarding a student's financial aid application. *34 C.F.R. §§ 668.51 through 668.61*

**Noncompliance:** During the 2014-15 award year, verification was not completed correctly for student #25. Specifically, the student was selected under the V4 verification selection criteria, which requires the institution to specifically validate receipt (or non-receipt) of SNAP benefits as well as payment (or non-payment) of Child Support paid. LASD did not collect the required verification documentation for these two items.

**Required Action:** It was determined that all federal funds had been returned due to the student's withdrawal from the program. Therefore, no further action is required. However, it is important that LASD understands all of the requirements for the various verification selection criteria to ensure that all appropriate documentation is collected and maintained by the institution.

#### **Finding 5. Excess Cash Balance Maintained**

**Citation:** The Secretary considers excess cash to be any amount of title IV, HEA program funds that an institution does not disburse to students or parents by the end of the third business day following the date the institution either: received those funds; or deposited or transferred to its Federal account previously disbursed title IV, HEA program funds received, such as those resulting from award adjustments, recoveries, or cancellations. *34 C.F.R. § 668.166*

**Noncompliance:** LASD had one instance where the federal funds were not credited to the student account in the time period mandated by regulation. According to the Common Origination and Disbursement System (COD), student #2 was credited funds on October 21, 2013 but the funds were not posted to the student ledger until November 15, 2013; 25 days after it was posted to COD.

**Required Action:** As this appears to be isolated incidence, no further action is required. However, it is important that LASD follows established policy to ensure that funds are credited timely.

## **D. Appendix**

### Appendix A Lawyer's Assistant School of Dallas Student Sample

Appendix A (Student Sample) contains personally identifiable information; therefore, the appendix was provided to institutional officials while on site.