



October 24, 2012

Mr. Dariush Maddahi, President  
National Polytechnic College  
6630 Telegraph Road  
Commerce, CA 90040-3066

Certified Mail  
Return Receipt Requested  
# 7007 0710 0001 0674 5203

RE: **Final Program Review Determination**  
OPE ID: 03910400  
PRCN: 201220927833

Dear Mr. Maddahi:

The U.S. Department of Education's (Department's) San Francisco/Seattle School Participation Division issued a program review report (PRR) on June 7, 2012 covering National Polytechnic College's (NPC'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 2010-2011 and 2011-2012 award years. NPC's final response was received on July 3, 2012.

The San Francisco/Seattle School Participation Division has reviewed NPC's responses to the PRR. A copy of the program review report and NPC's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by NPC 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.

NPC's responses have resolved the findings. In addition, NPC has provided assurances that the appropriate corrective actions have been taken to resolve and prevent future occurrences of all findings. Therefore, NPC 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)].

National Polytechnic College  
OPE ID: 03910400  
PRCN: 201220927833  
Page 2 of 2

If you have any questions please call Tracy Simmonds at 415-486-5688.

Sincerely,

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

Rosario

Division Director  
San Francisco/Seattle School Participation Division

Enclosures: Program Review Report  
NPC Response to the Program Review Report

cc: Myra Grijalva, Financial Aid Coordinator  
California Bureau for Private Postsecondary Education  
Accrediting Commission of Career Schools and Colleges



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June 7, 2012

Mr. Dariush Maddahi, President  
National Polytechnic College  
6630 Telegraph Road  
Commerce, CA 90040-3066

Certified Mail  
Return Receipt Requested  
# 7007 0710 0001 0676 1036

RE: **Program Review Report**  
OPE ID: 03910400  
PRCN: 201220927833

Dear Mr. Maddahi:

From March 12, 2012 through March 16, 2012, Tracy Simmonds and Erik Fosker conducted a review of National Polytechnic College's (NPC's) 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 findings of that review are presented in the enclosed report.

Findings of noncompliance are referenced to the applicable statutes and regulations and specify the action required to comply with the statute and regulations. Please review the report and respond to each finding, indicating the corrective actions taken by NPC. The response should include a brief, written narrative for each finding that clearly states NPC's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, NPC must provide supporting documentation as required in each finding.

Please note that pursuant to HEA section 498A(b), the Department is required to:

- (1) provide to the institution an adequate opportunity to review and respond to any preliminary program review report<sup>1</sup> and relevant materials related to the report before any final program review report is issued;
- (2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination –
  - a. A written statement addressing the institution's response;
  - b. A written statement of the basis for such report or determination; and
  - c. A copy of the institution's response.

The Department considers the institution's response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution's written

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<sup>1</sup> A "preliminary" program review report is the program review report. The Department's final program review report is the Final Program Review Determination (FPRD).

response will not be attached to the FPRD. However, it will be retained and available for inspection by NPC upon request. Copies of the program review report, the institution's response, 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 the FPRD is issued.

The institution's response should be sent directly to Tracy Simmonds of this office within 30 calendar days of receipt of this letter.

**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 findings in the attached report do not contain any student PII. Instead, each finding references students only by a student number created by Federal Student Aid. The student numbers were assigned in *Appendix A, Student Sample*. The appendix was encrypted and sent separately to the institution via e-mail. Please see the enclosure Protection of Personally Identifiable Information for instructions regarding submission to the Department of required data / documents containing PII.

**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. Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact Tracy Simmonds at (415) 486-5688 or at [tracy.simmonds@ed.gov](mailto:tracy.simmonds@ed.gov).

Sincerely,

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

Erik Fosker  
Compliance Manager

cc: Myra Grijalva, Financial Aid Coordinator

**Enclosures:**

Program Review Report  
Protection of Personally Identifiable Information

## **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.



START HERE  
GO FURTHER  
FEDERAL STUDENT AID

**Prepared for**

**National Polytechnic College**

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**OPE ID: 03910400**

**PRCN: 201220927833**

**Prepared by**

**U.S. Department of Education**

**Federal Student Aid**

**San Francisco/Seattle School Participation Division**

## **Program Review Report**

June 7, 2012

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PRCN: 201220927833  
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**A. Institutional Information**

National Polytechnic College  
6630 Telegraph Road  
Commerce, CA 90040-3066

Type: Proprietary

Highest Level of Offering: Non-Degree 3+ Year Program ( $\geq$  2700 hours)

Accrediting Agency: Accrediting Commission of Career Schools and Colleges

Current Student Enrollment: 213

% of Students Receiving Title IV: 97%

Title IV Participation-Postsecondary Education Participants System:

	<u>2010-2011</u>	<u>2009-2010</u>
Federal Pell Grant Program	\$1,732,784	\$1,515,003
Federal Direct Stafford Loan Program (FDL)		
Subsidized	\$1,121,017	\$ 997,746
Unsubsidized	\$1,041,085	\$1,052,929
PLUS	\$ 134,288	\$ 90,021
Federal Supplemental Educational Opportunity Grant (FSEOG) Program	\$ 32,774	\$ 11,389

Default Rate FFEL/DL:      2009 12.3%  
                                         2008 29.5%

## **B. Scope of Review**

The U.S. Department of Education (the Department) conducted a program review at National Polytechnic College (NPC) from March 12, 2012 to March 16, 2012. The review was conducted by Tracy Simmonds and Erik Fosker.

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

A sample of 30 files was identified for review from the 2010-2011 and 2011-2012 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 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 NPC'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 NPC 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 (FPRD) 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 NPC to bring the operation of the financial aid programs into compliance with the statutes and regulations.

### **Finding 1. Failure to Offer Maximum Title IV Eligibility**

**Citation:** Federal regulations specify that a school may refuse to originate a Direct Subsidized, Direct Unsubsidized, or Direct PLUS Loan or may reduce the borrower's determination of need for the loan if the reason for that action is documented and provided to the borrower in writing, and if the determination is made on a case-by-case basis; the documentation supporting the determination is retained in the student's file; and the school does not engage in any pattern or

practice that results in a denial of a borrower's access to Direct Loans because of the borrower's race, gender, color, religion, national origin, age, disability status, or income.  
34 C.F.R. § 685.301(a)(8).

**Noncompliance:** Instead of certifying student loans for the maximum amount for which students were eligible, NPC limited the amounts of Federal Direct Loans (DLs) during the 2010-2011 award year. Interviews with school officials revealed that the award notifications were not updated to include maximum annual loan limits until the 2011-2012 award year. In addition, institutional officials advised the reviewers that all students are required to sign a payment plan agreement for cash payments to NPC, which varied from student to student. Furthermore, school officials advised the reviewers that reasons for limiting the amounts of DLs included to meet the 90/10 ratio and get its enrolled students accustomed to making monthly payments before their federal student loans become due six months after graduation.

Students (#1 - #15) from the 2010-2011 award year had no documentation in the files evidencing notification of the maximum DL eligibility. Accordingly, NPC students were unable to make an informed decision about the amount of DL funds they could borrow because they were not aware of the maximum amount of DL for which they may have been eligible.

**Required Action:** Subsequent to the site visit, NPC provided the reviewers with an "Acknowledgement of Financial Aid Eligibility" form and a "Financial Aid Eligibility Checklist" that it will now use to ensure that its students acknowledge the amount of subsidized and unsubsidized loan that they are eligible to borrow for each enrollment period and understand their financial aid eligibility.

NPC must revise its packaging policies, and is required to provide a copy of its revised policies and procedures with its response to this finding. Lastly, NPC must provide evidence that all its currently enrolled students were made aware of their full eligibility for Title IV funds.

## **Finding 2. Crime Awareness Requirements Not Met**

**Citation:** By October 1 of each year, an institution must distribute to all enrolled students and current employees, its annual security report. 34 C.F.R. § 668.41(e)(1). For prospective students and prospective employees, institutions must provide a notice of the availability of the annual security report, a description of its contents and an opportunity to request a copy.  
34 C.F.R. § 668.41(e)(4).

Further, the Department of Education has prepared "The Handbook for Campus Safety and Security Reporting" (2011) to assist institutions in complying with the Clery Act disclosures. The regulations governing the Campus Security Report can be found at 34 C.F.R. § 668.41 & 668.46. This handbook may be found at <http://www.ed.gov/admins/lead/safety/campus.html>.

**Non-Compliance:** The reviewers found that NPC's annual Campus Security Report did not contain all of the following:

- a. A report of crime statistics on the basis of location broken down by:
  - (1) Murder and non-negligent manslaughter and negligent manslaughter
  - (2) Forcible sex offenses and non-forcible sex offenses
  - (3) Hate crimes, broken down by category of prejudice, including actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability, and by type of crime, as noted in 34 C.F.R. § 668.46(c)(3);
- b. A statement of current campus policies regarding procedures for students and others to report criminal actions or other emergencies occurring on campus. This statement must include the institution's policies concerning its response to these reports including
  - (1) Policies for making timely warning reports to members of the campus community regarding the occurrence of crimes;
  - (2) Policies for preparing the annual disclosure of crime statistics;
  - (3) A list of the titles of each person or organization to whom students and employees should report the criminal offenses for the purpose of making timely warning reports and the annual statistical disclosure. This statement must also disclose whether the institution has any policies or procedures that allow victims or witnesses to report crimes on a voluntary confidential basis for inclusion in the annual disclosure of crime statistics, and, if so, a description of those policies and procedures;
  - (4) A statement of current policies concerning security of and access to campus facilities, and security considerations used in the maintenance of campus facilities;
- c. A statement that encourages pastoral counselors and professional counselors, if and when they deem it appropriate, to inform the persons they are counseling of any procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics;
- d. A description of the type and frequency of programs designed to inform students and employees about campus security procedures and practices and to encourage students and employees to be responsible for their own security and the security of others;
- e. A statement of policy concerning the monitoring and recording through local police agencies of criminal activity in which students engaged at off-campus locations of student organizations officially recognized by the institution, including student organizations with off-campus housing facilities;
- f. A description of any drug or alcohol-abuse education programs, as required under Section 120(a) through (d) of the HEA;
- g. A notification to students of existing on-and off-campus counseling, mental health, or other student services for victims of sex offenses;
- h. A list of sanctions the institution may impose following a final determination of an institutional disciplinary proceeding regarding rape, acquaintance rape, or other forcible or non-forcible sex offenses;

- i. A statement advising the campus community where law enforcement agency information provided by a State under section 170101(j) of the Violent Crime Control and Law Enforcement Act of 1994 (42 U.S.C. § 14071(j)), concerning registered sex offenders, may be obtained, such as the law enforcement office of the institution, a local law enforcement agency with jurisdiction for the campus, or a computer network address.

**Required Action:** Subsequent to the site visit, NPC provided the reviewers with its updated Campus Safety and Security written procedures, along with a Crime and Hate Crime Report form, Sex Offenses Report form, and Daily Crime Log.

NPC must modify its most recent annual security report to include the items listed above and submit a copy of the same with its response to this finding.

### **Finding 3. Inadequate Drug and Alcohol Abuse Prevention Program**

**Citation:** An Institution of Higher Education's (IHE's) drug prevention program must, at a minimum, include the following:

(a) The annual distribution in writing to each employee, and to each student who is taking one or more classes for any type of academic credit except for continuing education units, regardless of the length of the student's program of study, of—

- (1) Standards of conduct that clearly prohibit, at a minimum, the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees on its property or as part of any of its activities;
- (2) A description of the applicable legal sanctions under local, state, or federal law for the unlawful possession or distribution of illicit drugs and alcohol;
- (3) A description of the health risks associated with the use of illicit drugs and the abuse of alcohol;
- (4) A description of any drug or alcohol counseling, treatment, or rehabilitation or re-entry programs that are available to employees or students; and
- (5) A clear statement that the IHE will impose disciplinary sanctions on students and employees (consistent with local, state, and federal law), and a description of those sanctions, up to and including expulsion or termination of employment and referral for prosecution, for violations of the standards of conduct required by paragraph (a)(1) of this section. For the purpose of this section, a disciplinary sanction may include the completion of an appropriate rehabilitation program.

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

- (1) Determine its effectiveness and implement changes to the program if they are needed; and
- (2) Ensure that the disciplinary sanctions described in paragraph (a)(5) of this section are consistently enforced. 34 C.F.R. § 86.100.

**Noncompliance:** The reviewers found that NPC's Student Services office had written pamphlets/materials about drug and alcohol counseling, treatment, and referrals to provide to its students and/or staff, but it did not have a formal Drug and Alcohol Abuse Prevention Program in place.

**Required Action:** During the site visit, NPC's Director of Operations provided the reviewers with its required biennial review document for its Drug and Alcohol Abuse Prevention Program, which was deemed acceptable. Accordingly, this finding is resolved.

#### **Finding 4. Exit Counseling Deficiency**

**Citation:** A school must ensure that exit counseling is conducted with each Direct Subsidized Loan or Direct Unsubsidized Loan borrower and graduate or professional student Direct PLUS Loan borrower shortly before the student borrower ceases at least half-time study at the school. 34 C.F.R. § 685.304(b). Further, the school must maintain documentation substantiating the school's compliance with this section for each student borrower. 34 C.F.R. § 685.304 (b)(7).

**Noncompliance:** There was no documentation in the file of Student #23 reflecting that exit counseling had been completed.

**Required Action:** NPC must review its policies and procedures to ensure that all students are provided with exit counseling and the documentation is maintained in the student files. It must establish and maintain written policies and procedures to assure that any recipient of Direct Loan funds receives exit counseling materials within 30 days of the last date of attendance and that such exit counseling be documented in the student files. A copy of these policies and procedures must be provided with NPC's response to this finding. Finally, NPC must also provide documentation to confirm that exit loan counseling documentation has been provided to the above student.

#### **Finding 5. Late Return of Ineligible Pell Funds**

**Citation:** Federal regulations state that an institution may disburse Title IV, HEA program funds to a student or parent for a payment period only if the student is enrolled for classes for that payment period and is eligible to receive those funds. 34 C.F.R. § 668.164(b)(3).

If a student is enrolled in a credit-hour educational program that is offered in semester, trimester, or quarter academic terms, the earliest an institution may disburse Title IV, HEA program funds to a student or parent for any payment period is 10 days before the first day of classes for a payment period. 34 C.F.R. § 668.164(f)(1).

An institution is liable for a Federal Pell Grant overpayment if the overpayment occurred because the institution failed to follow the procedures set forth in federal regulations. The institution must restore an amount equal to the overpayment to its Federal Pell Grant account. 34 C.F.R. § 668.79(a)(2).

**Noncompliance:** NPC disbursed 2010-11 Pell funds in the amount of \$2,775 to Student #9 on June 7, 2011. However, the payment period to which the funds were applied did not begin until July 29, 2011, which is after the 2011-12 award year had already begun and earlier than the 10 days (before the start of a payment period) allowed by regulation. NPC should have returned the ineligible Pell disbursement within a reasonable period of time (45 days or less), but did not return the funds to the Department until February 3, 2012.

**Required Action:** NPC must review and revise its policies and procedures to ensure that it does not disburse ineligible Title IV funds to students and follows the regulation to ensure that all Title IV funds are returned to the Department in a timely manner. NPC is required to provide a copy of its revised policies and procedures with its response to this finding.

#### **Finding 6. Federal Work Study (FWS) Not Monitored/Documented**

**Citation:** An institution must maintain FWS program and fiscal records that include a certification by the student's supervisor that each student has worked and earned the amount being paid. The certification must include or be supported by a time record showing the hours each student worked in clock time sequence. 34 C.F.R. § 675.19.

**Noncompliance:** During an interview with one of the Financial Aid Officers, the individual stated that NPC is in the process of implementing its FWS program. NPC failed to inform the reviewers that any of its current students were participating in the FWS program, although information on all Title IV aid recipients was requested. There was one FWS recipient, however. The FWS documents in the student's file did not contain an employment contract for the FWS position, job description, supervisor in charge, hourly wages or time record. In addition, the student's FWS documents contained conflicting information.

Student #25: The student's file had a FWS worksheet with an award amount of \$900 and a notation that indicated check #6752 had been issued on March 1, 2012 in the amount of \$180. The copy of check #6752 in the file, however, is in the amount of \$168.03, which conflicts with the amount stated on the FWS worksheet. The only other documentation in this student's file related to FWS is a petition from her requesting living expenses with a note that states "funds available \$351 – student is requesting FWS."

National Polytechnic College

OPE ID: 03910400

PRCN: 201220927833

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**Required Action:** Subsequent to the site visit, NPC provided the reviewers with a copy of the "School/Employer's Agreement" and "FWS Release" forms, along with its FWS Guide and two standard letters regarding FWS eligibility/deadline for students and a thank you letter to participating employers.

NPC must provide an employment contract for Student #25 that includes the FWS position, job description, supervisor and hourly wages. In addition, NPC must provide a time record for Student #25 showing the hours worked each day. NPC must review and revise its policies and procedures to ensure that it properly monitors and documents the FWS program and must submit a copy with its response to this finding.



"Where a BETTER FUTURE begins..."

June 28, 2012

Erik Foster  
Compliance Manager  
U.S. Department Of Education  
San Francisco/Seattle School Participation Division  
50 Beale Street, Suite 9800  
San Francisco, Ca 94105

Re: **Program Review Report**  
OPEID: 03910400  
PRCN: 201220927833

Dear Mr. Foster:

On June 13<sup>th</sup>, 2012 National Polytechnic College (NPC) received a letter dated June 7<sup>th</sup>, 2012, in which we were notified that you and Tracy Simmonds are requesting documentation of our response to the Department of Education Program Review Dated March 12, 2012 through March 16, 2012. We appreciate the opportunity to demonstrate compliance, specifically in the areas cited in this letter.

For ease of review, we have restated portions of your findings and required actions, followed by our response.

### **Finding 1: Failure to Offer Maximum Title IV Eligibility**

#### **Required Actions:**

In response to this finding, NPC is required to:

1. NPC must revise its packaging policies, and is required to provide a copy of its revised policies and procedures with its response to this finding. Lastly, NPC must provide evidence that all its currently enrolled students were made aware of their full eligibility for Title IV funds.

**NPC Response:**

We have revised our policies and procedures to include that all students will receive an "Acknowledgement of Financial Aid Eligibility" form and a "Financial Aid Eligibility Checklist" upon entrance interview to ensure that students acknowledge the amount of subsidized and unsubsidized loan that they are eligible to borrow for each enrollment period and understand their financial aid eligibility. **See exhibit 1**

Attached is also a copy of the "Acknowledgement of Financial Aid Eligibility" form for all currently enrolled students, **See exhibit 2**, and a list of students with "Acknowledgement of Financial Aid Eligibility." **See exhibit 2a**

There are 11 students that are on a leave of absence (LOA) that we will have their Acknowledgment signed and placed in the Financial Aid file when they return to school.

**Finding 2: Crime Awareness Requirements Not Met**

In response to this finding, NPC is required to:

1. NPC must modify its most recent annual security report to include the items listed in the Non-Compliance finding and submit a copy of the same with its response to this finding.

**NPC Response:**

We have modified our most recent annual security report to include all items listed in the program review report under Finding 2 and are cross referenced in **exhibit 3**.

**Finding 3: Inadequate Drug and Alcohol Abuse Prevention Program**

In response to this finding, NPC is required to:

1. During the site visit, NPC's Director of Operations provided the reviewers with its biennial review document for its Drug and Alcohol Abuse Prevention Program, which was deemed acceptable. Accordingly, this finding is resolved.

**NPC Response:**

No action required.

## **Finding 4: Exit Counseling Deficiency**

In response to this finding, NPC is required to:

1. NPC must review its policies and procedures to ensure that all students are provided with exit counseling and the documentation is maintained in the student files. It must establish and maintain written policies and procedures to assure that any recipient of Direct Loan funds receives exit counseling materials within 30 days of the last date of attendance and that such exit counseling be documented in the student files. A copy of these policies and procedures must be provided with NPC's response to this finding. Finally, NPC must also provide documentation to confirm that exit loan counseling documentation has been provided to the above student (Student #23).

### **NPC Response:**

We have reviewed our policies and procedures to ensure that all students are provided with exit counseling and the documentation is maintained in the student files. A copy of our policies and procedures regarding Exit Interviews is attached. **See exhibit 4**

Attached is also documentation that the exit counseling for Student #23 was completed. **See exhibit 5**

## **Finding 5: Late Return of Ineligible Pell Funds**

In response to this finding, NPC is required to:

1. NPC must review and revise its policies and procedures to ensure that it does not disburse ineligible Title IV funds to students and follows the regulation to ensure that all Title IV funds are returned to the Department in a timely manner. NPC is required to provide a copy of its revised policies and procedures with its response to this finding.

### **NPC Response:**

We have reviewed and revised our policies and procedures to ensure that all ineligible Title IV funds are returned within a reasonable period of time (45 days or less) to the department. A copy of our policies and procedures regarding refunds is attached. **See exhibit 6**

## Finding 6: Federal Work Study (FWS) Not Monitored/Documented

In response to this finding, NPC is required to:

1. NPC must provide an employment contract for Student #25 that includes the FWS position, job description, supervisor and hourly wages. In addition, NPC must review and revise its policies and procedures to ensure that it properly monitors and documents the FWS program and must submit a copy with its response to this finding.

### NPC Response:

We have provided the employment contract for Student #25 that includes the FWS position, job description, supervisor in charge, and time record. **See exhibit 7**

We have also reviewed and revised our policies and procedures to include the FWS program are properly monitored and that documents are filed. **See exhibit 8**

Should you need any further information with regards to this response, please feel free to contact me at any time at 323-728-9636 or [cmugrdechian@npccollege.edu](mailto:cmugrdechian@npccollege.edu).

Sincerely,

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

Director of Operations

**Appendix A: Students Referenced in the Program Review Report**  
Students #1-15 2010-11 AY  
Students #16-30 2011-12 AY

#	NAME	SSN
1	(b)(6); (b)(7)(C), (b)(7)(C)	
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