



September 22, 2014

Mr. James J. Mergiotti, President & CEO
Peirce College
1420 Pine Street
Philadelphia, PA 19102-4699

RE: Final Program Review Determination Closeout Letter
OPE ID: 00330900
PRCN: 201320328222

Dear President Mergiotti:

This letter is in reference to the documentation received in response to the instructions provided in the Final Program Review Determination. All requirements have been addressed. The institution may now consider the program review closed, with no further action required.

Program records relating to the period covered by this program review are now subject to the record retention requirements in 34 C.F.R. § 668.24(e)(1), (2), which generally require that records be retained until the close of the third award year following the award year in which the student last attended the institution or the aid was awarded.

The courtesy and cooperation extended during the program review process is appreciated. If you have any questions, please do not hesitate to contact Tara Johnston at (215) 656-6488.

Sincerely,

(b)(6)

Nancy Paula Gifford
Division Director

cc: Mr. Bradford K. Hodge, Vice President, Finance
Ms. Kristina Fripps, Director, Student Financial Services

Federal Student Aid

An OFFICE of the U.S. DEPARTMENT of EDUCATION

Philadelphia School Participation Division, 100 Penn Square East, Suite 511, Philadelphia, PA 19107
StudentAid.gov

Index Sheet

Open Id No: 00330900

School Name: Peirce College

Subfolder: Program Review/FPRD

Doc Type: FPRD with Attachments

Rec Date:

Org Date: 05/27/2014

School Year: 2014

ACN:

PRCN: 201320328222

Box ID: 1778

Unique ID: SC1000000924859





May 27, 2014

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Mr. James J. Mergiotti, President & CEO
Peirce College
1420 Pine Street
Philadelphia, PA 19102-4699

RE: Final Program Review Determination
OPE ID: 00330900
PRCN: 201320328222

Dear President Mergiotti:

The U.S. Department of Education's (Department's) School Participation Team - Philadelphia issued a program review report on July 5, 2013 covering Peirce College'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 2011-2012 and 2012-2013 award years. Peirce College's final response was received on September 2, 2013. A copy of the program review report (and related attachments) and Peirce College's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by Peirce College 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: (1) identify liabilities resulting from the findings of this program review report, (2) provide instructions for payment of liabilities to the Department, and (3) notify the institution of its right to appeal.

The total liabilities due from the institution from this program review are \$ 83,323.86.

This final program review determination contains detailed information about the liability determination for all findings.

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).

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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. In addition, Appendix D, Finding # 2 File Review Student List and Appendix E, Finding # 2 Liability Calculation contain PII. These appendices were encrypted and sent to the institution via e-mail.

Appeal Procedures:

This constitutes the Department's FPRD with respect to the liabilities identified from the July 5, 2013 program review report. If Peirce College wishes to appeal to the Secretary for a review of financial liabilities established by the FPRD, the institution must file a written request for an administrative hearing. Please note that institutions may appeal financial liabilities only. The Department must receive the request no later than 45 days from the date Peirce College receives this FPRD. An original and four copies of the information Peirce College submits must be attached to the request. The request for an appeal must be sent to:

Ms. Mary E. Gust, Director
Administrative Actions and Appeals Service Group
U.S. Department of Education
Federal Student Aid/PC
830 First Street, NE - UCP3, Room 84F2
Washington, DC 20002-8019

Peirce College's appeal request must:

- (1) indicate the findings, issues and facts being disputed;
- (2) state the institution's position, together with pertinent facts and reasons supporting its position;
- (3) include all documentation it believes the Department should consider in support of the appeal. An institution may provide detailed liability information from a complete file review to appeal a projected liability amount. Any documents relative to the appeal that include PII data must be redacted except the student's name and last four digits of his / her social security number (please see the attached document, "Protection of Personally Identifiable Information," for instructions on how to mail "hard copy" records containing PII); and
- (4) include a copy of the FPRD. The program review control number (PRCN) must also accompany the request for review.

If the appeal request is complete and timely, the Department will schedule an administrative hearing in accordance with § 487(b)(2) of the HEA, 20 U.S.C. § 1094(b)(2). The procedures followed with respect to Peirce College's appeal will be those provided in 34 C.F.R. Part 668, Subpart H. **Interest on the appealed liabilities shall continue to accrue at the applicable**

value of funds rate, as established by the United States Department of Treasury, or if the liabilities are for refunds, at the interest rate set forth in the loan promissory note(s).

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 Tara Johnston at (215) 656-6488. Questions relating to any appeal of the FPRD should be directed to the address noted in the Appeal Procedures section of this letter.

Sincerely,

(b)(6)

Nancy Paula Gifford
Division Director

Enclosures:

Protection of Personally Identifiable Information
Final Program Review Determination

cc: Chanel Greene, Manager, Financial Aid
Brad Hodge, Vice President, Finance
Middle States Commission on Higher Education
American Bar Association
Pennsylvania Department of Education
Pennsylvania Department of Instruction
Delaware Department of Education
Delaware State Board of Education

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.

Prepared for
Peirce College

Federal Student
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OPE ID 00330900
PRCN 201320328222

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

Final Program Review Determination
May 27, 2014

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B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Peirce College from February 4, 2013 to February 8, 2013. The review was conducted by Ms. Tara Johnston and Ms. Deborah Marsh.

The focus of the review was to determine Peirce College's compliance with the statutes and regulations as they pertain to the institution's administration of the Title IV, HEA programs. The review consisted of, but was not limited to, an examination of Peirce College'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 33 files was 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. Appendix A lists the names and social security numbers of the students whose files were examined during the program review. A program review report was issued on July 5, 2013.

Disclaimer:

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

C. Findings and Final Determinations

Resolved Findings

Peirce College has taken the corrective actions necessary to resolve findings # 1, 4, 5, and 6 of the program review report. Therefore, these findings may be considered closed. A copy of the institution's written response is attached as Appendix C.

Findings requiring further action by Peirce College are discussed below.

Findings with Final Determinations

The program review report findings requiring further action are summarized below. At the conclusion of each finding is a summary of Peirce College's response to the finding, and the Department's final determination for that finding. A copy of the program review report issued on July 5, 2013 is attached as Appendix B.

Finding # 2. Title IV Funds Disbursed to Non-matriculating Students

Citation Summary: A student is eligible to receive Title IV funds if the student meets all of the general eligibility requirements in section 668.32 of the Code of Federal Regulations, which includes being a regular student enrolled, or accepted for enrollment, in an eligible program at an eligible institution.

A matriculated student is one who has applied and has been officially accepted for enrollment at an eligible institution for the purpose of obtaining a degree or certificate offered by the school.

An institution can have a policy to admit students provisionally/conditionally. However, the student is not considered a regular student and is not eligible for Title IV funds until he or she is officially admitted in an eligible program at the institution. *2012-2013 Federal Student Aid Handbook, Vol. 1, Chapter 1, Page 1-3.*

Noncompliance Summary: Peirce College disbursed Title IV Funds to students # 3, 13, 23 and 28, who were conditionally accepted, non-matriculating students.

Required Action Summary: The Department required Peirce College to conduct a file review of all Title IV recipients who were conditionally accepted during the 2011-2012 and 2012-2013 award years in order to ensure that the student subsequently submitted all required official admissions documents and were eligible for the Title IV funds disbursed. The institution was also required develop policies and procedures to ensure that its procedures are sufficient to prevent a reoccurrence of this finding.

The Department requested that Peirce College attempt to collect all required admissions documents for the conditionally accepted students and submit those documents in the response to the program review report.

Peirce College's Response: The Department received Peirce College's narrative response on September 2, 2013. This response was a letter dated, August 29, 2013. In its response to the program review report, Peirce College noted that it officially admitted students # 3, 13, and 28, but that student #23 was still considered conditionally accepted.

In addition, Peirce College conducted a file review of the remaining Title IV recipients who were conditionally accepted during the 2011-2012 and 2012-2013 award years in order to determine if all students subsequently submitted all required official admissions documents and were eligible for the Title IV funds disbursed.

The institution also provided a revised Admissions policy that requires students to submit all required official documents to complete the admission process.

Final Determination: The Department analyzed Peirce College's response. In response to the program review report, Peirce College reviewed a total of 1,521 students who were conditionally accepted during the 2011-2012 and 2012-2013 award years. Peirce College's file review showed the following:

- For 1461 students, Peirce College subsequently collected all required admissions documents; therefore the students were eligible for the Title IV funds disbursed; and
- For 60 students, Peirce College failed to obtain official high school transcripts or GED scores. The following chart is an excerpt from Appendix E, which provides the student specific details for all 60 conditionally accepted, non-matriculating students to whom Peirce College disbursed Title IV funds.

Student	HS/GED Transcript Received?	Start Date	Award year	11-12 Pell	11-12 FSEOG	11-12 DL Sub	11-12 DL Unsub	12-13 Pell	12-13 FSEOG	12-13 DL Sub	12-13 DL Unsub
F-1	N	09/06/11	11-12	\$1,150	\$0	\$0	\$0	\$0	\$0	\$0	\$0
F-2	N	03/12/12	11-12	3,469	0	3,484	5,972	0	0	0	0
F-3	N	09/06/11	11-12	1,500	498	1,742	2,986	0	0	0	0
TOTAL:				\$72,450	\$1,098	\$68,659	\$91,321	\$6,733	\$0	\$7,801	\$5,653

The total liability for this finding is \$83,323.86.

The total amount of DL funds Peirce College disbursed to ineligible, non-matriculating students was \$173,434.00. In lieu of requiring the institution to assume the risk of default by purchasing the ineligible loan from the holder, the Department has asserted a liability not for the loan amount, but rather for the estimated or potential loss that the government may incur with respect to the ineligible loan or loan amount. The estimated actual loss to the Department that has resulted or will result from those ineligible loans is based on Peirce College's most recent cohort default rate available. The result of the estimated actual loss for this finding is \$2,167.56. This amount is included in the "Liabilities Owed

to the Department via Check" liability in Section D, Summary of Liabilities. A copy of the results of the estimated loss calculation is included as Appendix F.

In addition, Peirce College is liable for the \$79,183.00 of Federal Pell Grant funds disbursed to ineligible, non-matriculating students. This amount is included in the "Liabilities Owed to the Department via Check" liability in Section D, Summary of Liabilities. Further, Peirce College must make the appropriate student-level adjustments to the Department's Common Origination & Disbursement (COD) Web Site prior to returning the funds to the Department. The student level detail for this finding is included as Appendix E.

Peirce College is also liable for the \$1,098.00 of FSEOG funds disbursed to ineligible, non-matriculating students. This amount is included in the "Liabilities Owed to the Department via G5" liability in Section D, Summary of Liabilities. In addition, Peirce College must make the appropriate adjustment to its Fiscal Operations Report and Application to Participate (FISAP).

Finally, the Department incurs a cost when it makes funds available to an institution, because it borrows those funds from the U.S. Treasury and must pay interest charges on those funds. The Department has determined that the cost to the government of the ineligible Pell Grant and FSEOG funds is \$875.30. This amount is included in the "Liabilities Owed to the Department via Check" liability in Section D, Summary of Liabilities. The result of cost of funds calculation is included as Appendix G.

Section E, Payment Instructions, provides instructions for the repayment of this liability, along with instructions on how to make the appropriate COD and FISAP adjustments.

Finding #3: Late Delivery of Credit Balances

Citation Summary: Whenever an institution disburses Title IV, HEA program funds by crediting a student's account and the total amount of all Title IV, HEA program funds credited exceeds the amount of tuition and fees, room and board, and other authorized charges the institution assessed the student, the institution must pay the resulting credit balance directly to the student or parent as soon as possible but no later than 14 days after the credit balance has occurred. 34 C.F.R. § 668.164(c).

If an institution obtains written authorization from a student or parent, the institution may hold on behalf of the student or parent any Title IV, HEA program funds that would otherwise be paid directly to the student or parent. The institution must pay any remaining balance on loan funds by the end of the loan period and any remaining other Title IV, HEA program funds by the end of the last payment period in the award year for which there were awarded. 34 C.F.R. § 668.165(b).

Noncompliance Summary: Peirce College failed to pay a Title IV credit balance to students # 11, 13, 27, and 28 within the 14-day regulatory timeframe.

The following chart summarizes the student specific details:

Student #	Date Credit Balance Occurred	Date Credit Balance was Paid	# of Days Late
11	11/11/11	12/1/11	6
13	03/31/12	06/11/12	58
27	09/13/12	10/19/12	22
27	01/24/13	Unpaid as of 2/8/13	1 day late as of 2/8/13
28	01/24/13	Unpaid as of 2/8/13	1 day late as of 2/8/13

Required Action Summary: The Department required Peirce College to review its policies and procedures to ensure that credit balances are provided to students within 14 days. In addition, the Department required Peirce College to advise regarding the status of the outstanding credit balance funds due to students #27 and 28.

Peirce College's Response: The Department received Peirce College's narrative response on September 2, 2013. This response was a letter dated, August 29, 2013. In its response to the program review report, Peirce College stated that only one of the four students noted in this finding (student # 11) received a late credit balance payment.

For student #13, Peirce College noted that "the student's refund was held because of an inconsistent attendance pattern, followed by the student withdrawing from the course. Grades for the semester were available on 5/13/12. The Return to Title IV calculation was completed 5/30/12, at which point it was determined that the student reached the 60.9% point and the refund was released on 6/11/12 (12 days later)."

For the credit balance that occurred on 9/13/12 for student #27, Peirce College noted that the "student's refund was held due to nonattendance as the student was absent on 9/13/12, 9/20/12, 9/27/12 while in a 15-week course. The student did not attend again until 10/4/12, which wasn't reflected in their database until the next day (10/5/12). The refund was then released 14 days later on 10/19/12."

For the credit balance that occurred on 1/24/13 for student #27, Peirce College disagreed that the student had an additional late credit balance. That after the institution disbursed

student # 27's loans on January 24, 2013; she had a balance due to the Peirce College in the amount of \$231.66.

For student #28, Peirce College noted that "the credit balance was initially being held for nonattendance" and that "it was noted during the program review that the student did not have a high school transcript on file." The College subsequently reversed all of the student's financial aid on 2/22/12.

Final Determination: The Department reviewed Peirce College's response. The institution concurred with the finding for student # 11, but stated that the credit balances were held for students # 13, 27¹ and 28 because of nonattendance or for an inconsistent attendance pattern. In addition, Peirce College disagreed that a credit balance occurred on 1/24/13 for student #27.

A Title IV credit balance occurs whenever an institution credits Title IV funds to a student's account and the total amount of those funds exceed the student's charges. An institution may not require a student to take any additional actions to obtain his or her credit balance. The institution must pay a credit balance as soon as possible but no later than 14 days after the credit balance has occurred, unless the student has provided written authorization for the institution to hold the credit balance funds.

A credit balance cannot be held beyond the 14-day regulatory timeframe for nonattendance or for an inconsistent attendance pattern. Therefore the credit balances for students # 13, 27¹ above and 28² were not issued timely.

Peirce College has acknowledged that Title IV credit balances cannot be held beyond the 14 day regulatory timeframe for nonattendance or for an inconsistent attendance pattern and the institution has revised its policies and procedures to ensure that credit balances are issued to students within the 14 day regulatory timeframe.

The Department concurs that a credit balance was not created on January 24, 2013 for student #27.

¹ The credit balance that occurred on 9/13/12.

² It was noted during the program review that the student did not have a high school transcript; therefore, Peirce College returned the Title IV funds to the Department on 2/22/12. However, the credit balance that occurred on 1/24/13 was held on her account 15 days beyond the regulatory timeframe.

D. Summary of Liabilities

The total amount calculated as liabilities from the findings in the program review determination is as follows.

Established Liabilities – Duplicate Liabilities Removed					
Liabilities	2011-2012	2012-2013	Total Liabilities Owed to the Department via Check (Refer to Payment Instructions Section 1)	Total Liabilities Owed to the Department via G5 (Refer to Payment Instructions Section 2)	
Finding # 2					
Pell Grant - Closed Award Year	\$72,450.00	\$6,733.00	\$79,183.00	\$0.00	
FSEOG	\$1,098.00	\$0.00	\$0.00	\$1,098.00	
Estimated Loss for DL Ineligible Loan Liability of \$173,434.00	\$2,167.56	\$0.00	\$2,167.56	\$0.00	
Cost of Funds for Finding # 2	\$863.31	\$11.99	\$875.30	\$0.00	
Total Liability for Finding 2:	\$83,323.86				
Payment Instructions Sections					
Section 1. Liabilities Owed Department via Check			\$82,225.86	\$0.00	\$82,225.86
Section 2. Liabilities Owed to the Department via G5			\$0.00	\$1,098.00	\$1,098.00
Total:					\$83,323.86

E. Payment Instructions

Section 1. Liabilities Owed to the Department via Check

Peirce College owes to the Department \$82,225.86. Payment must be made by forwarding a check made payable to the "U.S. Department of Education" to the following address within 45 days of the date of this letter:

U.S. Department of Education
P.O. Box 979026
St. Louis, MO 63197-9000

Remit checks only. Do not send correspondence to this address.

Payment must be made via check and sent to the above Post Office Box. Payment and/or adjustments made via G5 will not be accepted as payment of this liability. Instead, the school must first make any required adjustments in COD as required by the applicable finding(s) and Section II – Instructions by Title IV, HEA Program (below), remit payment, and upon receipt of payment the Department will apply the funds to the appropriate G5 award (if necessary).

The following identification data must be provided with the payment:

Amount:	\$82,225.86
DUNS:	077080216
TIN:	231627436
PRCN:	201320328222

If the Department does not receive payment within the 45-day period, interest will accrue in monthly increments until the date of receipt of your payment. If you have any questions regarding interest accruals or payment credits, you may telephone (202) 377-3843 and ask to speak to your institution's account representative.

If within forty-five days of the date of this letter, your institution has neither made payment in accordance with these instructions nor entered into an arrangement to repay the liability under terms satisfactory to the U.S. Department of Education, the Department intends to collect the amount due and payable by administrative offset against payments due your organization from the Federal Government. Your institution may object to the collection by offset only by challenging the existence or amount of the debt. Your institution makes this challenge by timely appealing this determination under the procedures described in the "Appeal Procedures" section of this letter. The Department will use those procedures to consider any objection to offset. No separate appeal opportunity will be provided. If a timely appeal is filed, the Department will defer offset until completion of the appeal, unless the Department

determines that offset is necessary as provided in 34 C.F.R. § 30.28. This debt may also be referred to the Department of the Treasury for further action as authorized by the Debt Collection Improvement Act of 1996.

If full payment cannot be made within 45 days of the date of this letter, contact the Debt Management Group at (202) 245-8080 to apply for a payment plan. Interest charges and other conditions apply. Written request may be sent to:

U.S. Department of Education
Office of the Chief Financial Officer
Accounts Receivable Group
550 12th Street, SW, Room 6114
Washington, DC 20202-4461

Pell Grant Liability for Closed Award Year: COD Adjustments Required:

As noted in Section D, Summary of Liabilities, the institution is required to return \$72,450.00 in 2011-2012 and \$6,733.00 in 2012-2013 Pell Grant funds. These amounts are reflected above in the total liabilities owed to the Department via check.

Prior to paying the liabilities to the Department via check, Peirce College must make adjustment to the appropriate Pell Grant disbursement records for each student identified in Appendix E.

Because the 2011-2012 and 2012-2013 award years are now in a closed processing status in COD, Peirce College must request extended processing in order to make student level adjustments in COD. Peirce College may request extended processing through the COD Web Site (<http://cod.ed.gov>) by completing the following steps:

- Click on the Request Post Deadline/Extended Processing link under the School menu.
- On the request screen, the institution should indicate in its explanation that the request is based on a program review, and provide the program review control number.
- The institution will be notified of the status of the request at the time of submission, and will also be notified by email to the FAA and President when extended processing has been authorized. At that time, the school must transmit student/borrower level adjustments to COD for the closed award year.

A copy of the adjustment to each student's COD record must be sent to Tara Johnston **within 45 days of the date of this letter**. If the institution has any difficulty making the adjustments exactly as established in Appendix E, it should keep a detailed list of any

discrepancies identified. This information should also be sent to Tara Johnston as soon as possible, but no later than **45 days from the date of this letter.**

Section 2. Liabilities Owed to the Department via G5

Peirce College must repay \$1,098.00 in FSEOG funds.

Peirce College must make corrections to its FISAP for the 2011-2012 award year, as follows:

- Log into eCB and make change(s) to the Working Copy, click on Submit and choose "Change Request". Provide the justification for the changes in the comments box, including that the changes are a result of a program review and include the Program Review Control Number.
- Once the request is approved, submit the changes within 5 days.
- Changes to the FISAP may result in changes to subsequent FISAPs. Contact the eCB Call Center at (877) 801-7168 for assistance in making this determination.
- If the recalculation of the school's funding results in an unprocessed deobligation (negative balance) because the school has drawn down its full authorization, return those funds via G5 in accordance with the automated notification from eCB. If the school has not drawn down its full authorization, the authorization will be reduced.

Peirce College must submit proof of the FISAP corrections and payment via G5 for any unprocessed deobligation (if applicable) to Tara Johnston **within 45 days of the date of this letter.**

Final Program Review Determination
PRCN #: 201320328222

Appendix A: Student Sample

**Student
Number**

**Student
Name**

**Social Security
Number**

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

Final Program Review Determination
PRCN #: 201320328222

Appendix B
Program Review Report



July 5, 2013

Mr. James J. Mergioti, President
Peirce College
1420 Pine Street
Philadelphia, PA 19102-4699

Certified Mail
Return Receipt Requested
7012 1010 0002 0472 0474

**RE: Program Review Report
OPE ID: 00330900
PRCN: 201320328222**

Dear President Mergioti:

From February 4, 2013 through February 8, 2013, Ms. Tara Johnston and Ms. Deborah Marsh as representatives of the U.S. Department of Education conducted a review of Peirce College'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 Peirce College. The response should include a brief, written narrative for each finding that clearly states Peirce College's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, Peirce College 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 report¹ 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

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

Federal Student Aid

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Philadelphia School Participation Division, 100 Penn Square East, Suite 511, Philadelphia, PA 19107
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response will not be attached to the FPRD. However, it will be retained and available for inspection by Peirce College 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 Tara Johnston of this office within 60 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. 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 Tara Johnston at (215) 656-6488 or tara.johnston@ed.gov.

Sincerely,

(b)(6)

John S. Loreng
Compliance Manager

cc: Chanel Greene, Financial Aid Administrator
Bradford K. Hodge, Chief Financial Officer

Enclosures:

Protection of Personally Identifiable Information
Program Review Report

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.

Prepared for
Peirce College

Federal Student Aid
AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

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OPE ID 00330900
PRCN 201320328222

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

Program Review Report

July 5, 2013

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A. Institutional Information

Peirce College
1420 Pine Street
Philadelphia, PA 19102-4699

Type: Private, Nonprofit

Highest Level of Offering: Bachelor's Degree

Accrediting Agency: Middle States Commission on Higher Education

2011-2012 Title IV Participation:

Federal Pell Grant	\$4,755,084
Federal Direct Loan (DL) Program	\$23,879,067
Federal Supplemental Educational Opportunity Grant (FSEOG)	\$192,686
Federal Work Study	\$141,828

Default Rate FFEL/DL:	2008	6.5%
	2009	9.3%
	2010	11.6%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Peirce College from February 4, 2013 to February 8, 2013. The review was conducted by Ms. Tara Johnston and Ms. Deborah Marsh.

The focus of the review was to determine Peirce College'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 Peirce College'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 33 files was 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. 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 Peirce College'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 Peirce College 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 Peirce College to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding # 1. Failure to Conduct Exit Counseling

Citation: An institution 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 the student borrower's questions.

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. Further, the institution must maintain documentation substantiating compliance with the Department's counseling requirements for each student borrower. 34 C.F.R. § 685.304 (b).

Noncompliance: Peirce College failed to conduct exit counseling for students # 1, 2, 3, 10, 11, 13, 14, and 15 who withdrew or graduated. In addition, the institution acknowledged that they had not conducted exit counseling for any students during the 2011-2012 and 2012-2013 award years.

An institution's failure to provide Federal Direct Loan exit counseling increases the possibility of a student defaulting on his or her loan. Federal student loans that go into default status create additional expense for the U.S. Department of Education.

Required Action: Peirce College must conduct a file review of all students who graduated or withdrew from the institution during the 2011-2012 and 2012-2013 award years in order to verify that exit counseling has been performed. Peirce College should send appropriate exit counseling materials to all students for whom the institution is unable to document previous counseling. The institution must submit a list of these students to the Department along with documentation that exit counseling materials were sent to each student.

Further, Peirce College must establish policies and procedures to ensure that in the future all required federal loan exit counseling is properly completed. A copy of the policies and procedures must also be sent with the institution's response to this program review report.

Finding # 2. Title IV Funds Disbursed to Non-matriculating Students

Citation: A student is eligible to receive Title IV funds if the student meets all of the general eligibility requirements in section 668.32 of the Code of Federal Regulations, which includes being a regular student enrolled, or accepted for enrollment, in an eligible program at an eligible institution.

A matriculated student is one who has applied and has been officially accepted for enrollment at an eligible institution for the purpose of obtaining a degree or certificate offered by the school.

An institution can have a policy to admit students provisionally/conditionally. However, the student is not considered a regular student and is not eligible for Title IV funds until he or she is officially admitted in an eligible program at the institution. *2012-2013 Federal Student Aid Handbook, Vol. 1, Chapter 1, Page 1-3.*

Noncompliance: Peirce College disbursed Title IV Funds to students # 3, 13, 23 and 28, who were conditionally accepted, non-matriculating students.

Peirce College's admission's policy stated that:

To be admitted to Peirce College as a matriculated student, all required official documents must be on file with Peirce College. Students who have completed the admissions process but not yet submitted all required official documents are considered non-matriculating and may enroll for up to 15 credits. Students will be notified about final acceptance into a matriculated program after review of official documentation.

Peirce College's required any student who applied to submit the following documents:

- *A completed application for admission with application fee.*
- *An official transcript documenting high school graduation or a copy of the GED or state equivalency diploma scores.*
- *Official college transcript for transfer evaluation if the student had previously attended college.*

Students # 3, 13, 23 and 28 were conditionally accepted to Peirce College; the students had not yet provided official high school transcript or GED scores. The conditional acceptance letter Peirce College sent to the students stated that students who have not yet submitted all required official documents were considered non-matriculated students.

The institution sent the students several follow up letters seeking copies of their official high school transcripts or GED scores. In these letters, Peirce explained to the students that failure to forward the documentation could delay registration and/or financial aid. However, as of February 8, 2013, the institution did not have official high school transcripts or GED scores for any of these students.

The students received the following Title IV funds while conditionally accepted at Peirce College:

Student #	Date Conditionally Accepted	Award Year	Pell	FSEOG	DL Sub	DL Unsubj
3	12/13/11	11-12	\$2,082	\$0	\$1,742	\$2,993
13	12/20/11	11-12	\$2,082	\$0	\$1,742	\$2,993
23	09/17/12	12-13	\$1,388	\$0	\$1,733	\$673
28	03/12/12	12-13	\$4,163	\$150	\$2,625	\$4,500

An institution's failure to ensure that all students are eligible prior to disbursing Federal funds may cause the institution to receive Federal funds to which it is not entitled and cause increased expense for the Department.

Required Action: Peirce College must review all Title IV recipients who were conditionally accepted during the 2011-2012 and 2012-2013 award years in order to ensure that the student subsequently submitted all required official admissions documents and were eligible for the Title IV funds disbursed.

Peirce College should provide the results of the file review in a spreadsheet, in the format indicated below. The institution must provide the spreadsheet in both hardcopy and electronic formats in response to this program review report. The spreadsheet must include the following information:

1. Student Name;
2. Social Security Number;
3. Start Date;
4. Award Year;
5. Total Pell Grant Funds Disbursed;
6. Total FSEOG Funds Disbursed;
7. Total Subsidized DL Funds Disbursed;
8. Total Unsubsidized DL Funds Disbursed;
9. Did the student subsequently submit all required admissions documents? (Y or N);
10. If the student did not subsequently submit all required admissions documents, provide the G5 Award Number for the applicable Title IV program(s).

Peirce College can attempt to collect all required admissions documents for the conditionally accepted students in the response to this program review report. However, these students must be captured in the results of the file review as requested above.

Peirce College must also review and revise its policies and procedures to ensure that its procedures are sufficient to prevent a recurrence of this finding. The institution should submit a copy of any policy changes with its response to this program review report.

Instructions for the repayment of any determined liability will be provided in the Final Program Review Determination letter.

Finding #3: Late Delivery of Credit Balances

Citation: Whenever an institution disburses Title IV, HEA program funds by crediting a student's account and the total amount of all Title IV, HEA program funds credited exceeds the amount of tuition and fees, room and board, and other authorized charges the institution assessed the student, the institution must pay the resulting credit balance directly to the student or parent as soon as possible but no later than 14 days after the credit balance has occurred. 34 C.F.R. § 668.164 (e).

If an institution obtains written authorization from a student or parent, the institution may hold on behalf of the student or parent any Title IV, HEA program funds that would otherwise be paid directly to the student or parent. The institution must pay any remaining balance on loan funds by the end of the loan period and any remaining other Title IV, HEA program funds by the end of the last payment period in the award year for which there were awarded. 34 C.F.R. § 668.165 (b).

Noncompliance: Peirce College failed to pay a Title IV credit balance to students # 11, 13, 27, and 28 within the 14 day regulatory timeframe.

A credit balance for student #11 was created on November 11, 2011; the student was not paid the credit balance until December 1, 2011. The credit balance was paid 6 days late.

A credit balance for student #13 was created on March 31, 2012; the student was not paid the credit balance until June 11, 2012. The credit balance was paid 58 days late.

A credit balance for student #27 was created on September 13, 2012; the student was not paid the credit balance until October 19, 2012. The credit balance was paid 22 days late. In addition, a credit balance was created on January 24, 2013. This credit balance was unpaid as of February 8, 2013.

A credit balance for student #28 was created on January 24, 2013. The institution noted that the student's credit balance was being held because it appeared that the student had stopped attending the institution. The institution stated that it would review the student's attendance status and credit balance funds again on February 25, 2013.

Failure to return Title IV credit balances within the 14-day timeframe can result in financial harm and burden to students. Students are entitled to receive credit balance funds to pay for living expenses they incur while attending school.

Required Action: Peirce College must advise regarding the status of the credit balance funds due to students #27 and 28. The institution should also provide updated student ledger cards.

In addition, Peirce College must review its policies and procedures to ensure that credit balances are provided within 14 days to students. Peirce College may only hold credit balances for students who have provided written authorization for the institution to do so. Peirce College should submit a copy of any policy changes with its response to this program review report.

Finding # 4: Verification Violations

Citation: Federal regulations require that an institution must verify the information provided by student aid applicants for those applications that have been "selected" by the Central Processing System (CPS). The student's Institutional Student Information Record (ISIR) indicates whether the application has been selected for verification. For applications selected by the CPS, the institution must collect acceptable documentation to verify five major data elements: household size, number enrolled in college, adjusted gross incomes (AGI), federal income tax paid, and certain untaxed income and benefits. 34 C.F.R. Sections 668.51 through 668.61.

On October 29, 2010, the Secretary published final regulations related to program integrity that included changes to the verification requirements. The new regulations include a provision that the Secretary publish a Federal Register notice announcing, for each award year, the Free Application for Federal Student Aid (FAFSA) information that an institution and an applicant may be required to verify for an applicant selected for verification, and the acceptable documentation for that information. On July 13, 2011, the Secretary published the required notice in the Federal Register (Vol. 75, No. 134) for the 2012-2013 award year. 34 C.F.R. § 668.56 (a) and *Dear Colleague Letter GEN-11-13*.

The Department develops a verification worksheet for each award year to assist schools in completing the verification process. The Department's worksheet is optional, but if this institution chooses to use the worksheet, it should make sure that the worksheet is signed, that all required sections are completed, and that the relevant tax returns or alternative documents are attached. *2012-2013 Federal Student Aid Handbook, Application and Verification Guide, Page AVG 78*.

Noncompliance: Peirce College failed to complete the verification process for students # 4 and 22.

Student #4's 2011-2012 ISIR transaction # 12 was selected for verification by the Central Processing System (CPS). The institution accepted a 2010-2011 verification worksheet to verify the student's household size and number enrolled in college for the 2011-2012 award year. However, the student's household size and number enrolled in college agreed with the data reported on the 2011-2012 ISIR, the worksheet provided was dated in July of 2011 which coincides with the 2011-2010 award year, and the student attached a 2010 tax return, which is appropriate for 2011-2012.

Student # 22's 2012-2013 ISIR transaction #3 was selected for verification by the CPS. The student's 2012-2013 ISIR indicated 3 family members in the parent's household; however the student's verification worksheet indicated a total of 2 individuals in household. The institution ran a new needs analysis while the review team was on-site and the student's 2012-2013 EFC changed from 0 to 843.

An institution's failure to complete verification may result in students receiving funds to which they are not entitled, thus creating additional expense for the US Department of Education.

Required Action: For student #22, the institution ran a new needs analysis and determined that the student's 2012-2013 Federal Pell Grant eligibility changed. However, the student withdrew during the 2012-2013 award year, so the institution must re-calculate the student's Return of Title IV funds (R2T4) calculation with the revised Federal Pell Grant eligibility in order to determine the amount of 2012-2013 Federal Pell Grant funds the student earned. Therefore, Peirce College must submit a copy of the new needs analysis and the revised R2T4 calculation in response to this program review report.

Peirce College must also review and revise its policies and procedures to ensure that its procedures are sufficient to prevent a recurrence of this finding. The institution should submit a copy of any policy changes with its response to this program review report.

Instructions for the repayment of any determined liability will be provided in the Final Program Review Determination letter.

Finding # 5: Direct Loan –Exceeded Aggregate Loan Limit

Citation: The aggregate unpaid principal amount of all Subsidized Direct Loans and Federal Stafford Loans made to a student, but excluding the amount of capitalized interest, may not exceed \$23,000 in the case of any student who has not successfully completed an undergraduate program of study. 34 C.F.R. § 685.203(d)(1).

In its Program Participation Agreement, an institution certifies that the amount of the loan for any student under part D of the Act is not in excess of the annual limit applicable for that loan program and that the amount of the loan, in combination with previous loans received by the borrower, is not in excess of the aggregate limit for that loan program. 34 C.F.R. § 685.300 (b)(3).

Noncompliance: Peirce College awarded a Subsidized Direct Loan to student # 21 for the 2012-2013 award year that exceeded the federal aggregate loan limit. According to the National Student Loan Data System (NSLDS) the student's unpaid principal amount of Subsidized Stafford loans funds is \$23,114.

Direct Loan funds awarded and disbursed to students in excess of the aggregate loan limit creates a financial burden for the Department.

Required Action: Peirce College must review and comment on the status of student # 21's aggregate Subsidized Direct Loan amount.

In addition, Peirce College must review its policies and procedures to ensure that Subsidized Direct Loan awards do not exceed the aggregate loan limit for undergraduate students as determined by federal regulations. Any revisions to the institution's policies and procedures must be submitted with the response to this program review report.

Instructions for the repayment of any determined liability will be provided in the Final Program Review Determination letter.

Finding # 5: Pell Grant – Underaward

Citation: The amount of a student's Federal Pell Grant for an academic year is based upon the payment and disbursement schedules published by the Secretary for each award year. Institutions should use this schedule to determine the amount of Federal Pell Grant the student is eligible to receive in accordance with the student's EFC, Cost of Attendance, and enrollment. 34 C.F.R. § 690.62(a).

If an eligible institution enters into a written arrangement with another eligible, under which the other eligible institution provides part of the educational program to students enrolled in the first institution, the Secretary considers that educational program to be an eligible program if the educational program offered by the institution that grants the degree or certificates otherwise satisfies the requirement of § 668.8 (*Eligible Program*). 34 C.F.R. § 668.5(a)(1).

Under a consortium agreement, a student may take courses at an institution other than his/her home institution if the courses are applicable to the student's certificate or diploma program. A consortium agreement is a written agreement between two Title IV eligible institutions: the home school is where the student is currently enrolled and the host school is where the student is taking part of his or her program requirements through the consortium agreement. 34 C.F.R. § 668.5(a).

When there is a consortium agreement between two eligible schools, the home institution must determine the student's eligibility for Title IV, HEA program funds. The home institution must take into account all the courses in which the student enrolls at each institution that apply to the student's degree or certificate when determining the student's enrollment status and cost of attendance and maintain all records regarding the student's eligibility for and receipt of Title IV, HEA program funds. 34 C.F.R. § 668.5(d).

Noncompliance: The institution failed to correctly calculate the Federal Pell Grant award for student # 33.

During the Fall 2012 term, student #33 was enrolled in 6 credits at Peirce College and 6 credits at Burlington County College (BCC). Peirce College entered into a consortium agreement with BCC, which made the student full time in the Fall 2012 term. Peirce College only considered the courses taken at the home institution when determining the student's eligibility for Title IV, HEA program funds. The student was entitled to an additional \$1388 in Federal Pell Grant funds.

Required Action: Peirce College must review and comment on the Pell Grant award for student #33.

In addition, Peirce College must review its policies and procedures for processing a consortium agreement with an eligible institution to ensure that all credit hours are included when calculating eligibility for Title IV, HEA program funds. The institution must submit a copy of its revised policies and procedures with the response to this program review report.

Final Program Review Determination
PRCN #: 201320328222

Appendix C

Peirce's Written Response to the Program Review Report

Peirce College
Program Review Report Response
August 29, 2013

From February 4, 2013 through February 8, 2013, the Department of Education conducted a program review of Peirce College. There were six findings of noncompliance identified during the review. The College has addressed each finding in the following report, indicated the corrective actions taken to resolve the finding, and provided supporting documentation.

Finding #1: Failure to Conduct Exit Counseling

When our former financial aid director left the institution, the College inadvertently stopped notifying students of the need for exit counseling. As soon as this was realized during the Department of Education program review, the College took immediate steps to notify students accordingly. In February 2013, file reviews were conducted for all students in award years 2011-2012 and 2012-2013 in order to determine if exit counseling had been performed.

The Office of Financial Aid requested lists of withdrawn and graduated students from the Registrar's Office for all students in award years 2011-2012 and 2012-2013. From these lists, the Office of Financial Aid was able to cross reference those students who borrowed loans in order to send them exit counseling information. All students who should have received exit counseling information have now been notified. Please refer to the enclosed policies and procedures document regarding exit counseling, as well as the list of students who have received notification regarding exit counseling.

Finding # 2: Title IV Funds Disbursed to Non-matriculating Students

This finding included four students who were conditionally accepted at Peirce and received Title IV funding. Subsequent to the program review, the College has officially admitted three of those students, with only student #23 still considered conditionally accepted.

The Office of Financial Aid did a file review by requesting a list of all students conditionally accepted or admitted to Peirce College during award years 2011-2012 and 2012-2013. This list was then cross-referenced against all financial aid recipients during the two award years covered by the program review. All students who received any form of federal aid during those years who did not have a high school transcript or GED on file were once again notified to submit proper documentation as soon as possible in order to complete their file.

The enclosed list reflects all Title IV recipients who were conditionally accepted during the 11-12 and 12-13 award years, along with a "Y/N" column reflecting if all required official admissions documents have been submitted.

Additionally, please see the enclosed copy of the College's new admissions policy, effective July 1, 2013. The College anticipates fewer students staying in a conditionally accepted status as the new policy requires a high school diploma or GED only for those students who have earned fewer than 15 college credits.

Finding # 3: Late Delivery of Credit Balances

The College believes that only one of the four students noted in this finding (student #11) was paid a credit balance beyond the 14 day regulatory timeframe.

Student #11: This student was on a list to receive her refund, however her name was accidentally crossed off. The College caught this a few days later and issued the credit balance refund on 12/1/11, which was 6 days late.

Student #13: This student's refund was held because of an inconsistent attendance pattern, followed by the student withdrawing from the course. Grades for the semester were available on 5/13/12. The Return to Title IV calculation was completed on 5/30/12, at which point it was determined that the student had reached the 60.9% point and the refund was released on 6/11/12 (12 days later).

Student #27: This student's refund was held due to nonattendance as the student was absent on 9/13/12, 9/20/12 and 9/27/12 while in a 15-week course. The student did not attend again until 10/4/12, which wasn't reflected in our attendance database until the next day (10/5/12). The refund was then released 14 days later on 10/19/12.

The College disagrees with the comment regarding an additional late unpaid credit balance for this student. After her account was billed on 1/7/13, she had an ending balance of \$3,624.66. On 1/24/13, the College disbursed \$3,393 in loans and Pell to her account, leaving the student with a debit balance of \$231.66. Therefore, a credit balance was not created at that point in time.

Student #28: While the credit balance was initially being held for nonattendance, it was noted during the program review that the student did not have a high school transcript on file with Peirce College. The College subsequently reversed all her financial aid on 2/22/13. The student's high school transcript was received on 5/3/13 and the College was then able to disburse her financial aid. Once the student's aid was disbursed, a credit balance did not

appear on her account until 5/23/13, after which the funds were released to her 12 days later on 6/4/13.

Currently, Peirce College has a multistep process to ensure students receive their refunds within the 14 day regulatory timeframe:

1. The Office of Financial Aid verifies in Jenzabar that students are enrolled for at least one credit for the semester in question for Pell Grants and SEOG and at least 6 credits for federal loan programs. Any student with a high school transcript hold in Jenzabar is removed from the list of potential students to have their financial aid disbursed.
2. The Office of Financial Aid takes this list of students and verifies in Powerfaids that the student has been awarded and has all the required documents prior to payments being applied to the students' accounts.
3. The Office of Financial Aid sends the funds electronically from Powerfaids to Jenzabar in order for the Business Office to double check the data and make sure the students are eligible to receive the funds based upon their attendance record.
4. All students who are determined to be eligible and have a credit on their account are then issued refunds based upon the student's preferred method which includes a check or electronic transfer to their debit card.
5. These students are then sent an email letting them know funds have been disbursed to their account. This email includes information regarding returning any and all funds the student does not wish to keep.

Finding #4: Verification Violations

The following actions were taken for the students reviewed:

Student #4: The student was contacted and asked to complete the verification worksheet for the correct award year of 2011-2012. The College is still waiting for the student to respond.

Student #22: The student's revised Return of Title IV Calculation is enclosed. All updates have been made to the student's account on the Department of Education's COD site. The updated documentation has been enclosed.

The College has implemented the following procedure to prevent a reoccurrence of this finding: the Manager and the Supervisor double-check the files of the Financial Aid Specialists. The Manager is responsible for students whose last name begins with the letters A-L and the Supervisor is responsible for students whose last name begins with the letters M-Z. This process includes but is not limited to verification documentation and/or changes made to the FAFSA. If an additional update needs to take place after the file has been reviewed then the Manager or Supervisor alerts the Specialist so the change(s) are completed immediately. If the change(s)

will affect the student's financial aid, the student is then notified that a new award letter is available to view. The Office of Financial Aid stays up to date with the latest policies, procedures, and Dear Colleague letters.

Finding #5: Exceeded Aggregate Loan Limit

Student #21 was updated while the Department of Education program reviewers were at the College. Enclosed is the updated NSLDS information for the student showing the subsidized aggregate limit of \$23,000.

Peirce College's current practice to determine potential aggregate loan limits is as follows:

1. The Financial Aid Specialists review their students based upon an alphabet breakdown.
2. The Financial Aid Specialists check the student's information on their FAFSA as well as on NSLDS to verify the latest amounts for subsidized, unsubsidized and the overall aggregate loan limits.
3. The Financial Aid Manager and Supervisor spot check student awards on an ongoing basis throughout the academic year as a double check.
4. The Financial Aid Technical Specialist creates a report each term to see if any students are at/or above their aggregate limit prior to financial aid being disbursed for the term so the Financial Aid Specialists can make adjustments if needed.

Finding #6: Pell Grant- Underaward

Student #33 entered into a consortium agreement with Burlington County Community College with approval from Peirce College. Although the College certified that the student would receive 12 credits for the fall 2012 term, only 6 credits were factored into the award since they were the only credits taken at Peirce that term. We have since updated the student's record in COD to reflect the 12 credit award and disbursed the additional Pell to her account. All documentation regarding this issue has been enclosed.

Please see the enclosed policies and procedures document regarding consortium agreements.

Appendix D: Finding # 2 File Review Student List
 PRCN #: 201320328222

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-1	(b)(6),(b)(7)(C)		N
F-2	(b)(6),(b)(7)(C)		N
F-3	(b)(6),(b)(7)(C)		N
F-4	(b)(6),(b)(7)(C)		N
F-5	(b)(6),(b)(7)(C)		N
F-6	(b)(6),(b)(7)(C)		N
F-7	(b)(6),(b)(7)(C)		N
F-8	(b)(6),(b)(7)(C)		N
F-9	(b)(6),(b)(7)(C)		N
F-10	(b)(6),(b)(7)(C)		N
F-11	(b)(6),(b)(7)(C)		N
F-12	(b)(6),(b)(7)(C)		N
F-13	(b)(6),(b)(7)(C)		N
F-14	(b)(6),(b)(7)(C)		N
F-15	(b)(6),(b)(7)(C)		N
F-16	(b)(6),(b)(7)(C)		N
F-17	(b)(6),(b)(7)(C)		N
F-18	(b)(6),(b)(7)(C)		N
F-19	(b)(6),(b)(7)(C)		N
F-20	(b)(6),(b)(7)(C)		N
F-21	(b)(6),(b)(7)(C)		N
F-22	(b)(6),(b)(7)(C)		N
F-23	(b)(6),(b)(7)(C)		N
F-24	(b)(6),(b)(7)(C)		N
F-25	(b)(6),(b)(7)(C)		N
F-26	(b)(6),(b)(7)(C)		N
F-27	(b)(6),(b)(7)(C)		N
F-28	(b)(6),(b)(7)(C)		N
F-29	(b)(6),(b)(7)(C)		N
F-30	(b)(6),(b)(7)(C)		N
F-31	(b)(6),(b)(7)(C)		N
F-32	(b)(6),(b)(7)(C)		N
F-33	(b)(6),(b)(7)(C)		N
F-34	(b)(6),(b)(7)(C)		N
F-35	(b)(6),(b)(7)(C)		N
F-36	(b)(6),(b)(7)(C)		N
F-37	(b)(6),(b)(7)(C)		N
F-38	(b)(6),(b)(7)(C)		N
F-39	(b)(6),(b)(7)(C)		N
F-40	(b)(6),(b)(7)(C)		N
F-41	(b)(6),(b)(7)(C)		N
F-42	(b)(6),(b)(7)(C)		N
F-43	(b)(6),(b)(7)(C)		N
F-44	(b)(6),(b)(7)(C)		N
F-45	(b)(6),(b)(7)(C)		N
F-46	(b)(6),(b)(7)(C)		N
F-47	(b)(6),(b)(7)(C)		N
F-48	(b)(6),(b)(7)(C)		N
F-49	(b)(6),(b)(7)(C)		N
F-50	(b)(6),(b)(7)(C)		N

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-51	(b)(6),(b)(7)(C)		N
F-52	(b)(6),(b)(7)(C)		N
F-53	(b)(6),(b)(7)(C)		N
F-54	(b)(6),(b)(7)(C)		N
F-55	(b)(6),(b)(7)(C)		N
F-56	(b)(6),(b)(7)(C)		N
F-57	(b)(6),(b)(7)(C)		N
F-58	(b)(6),(b)(7)(C)		N
F-59	(b)(6),(b)(7)(C)		N
F-60	(b)(6),(b)(7)(C)		Y
F-61	(b)(6),(b)(7)(C)		Y
F-62	(b)(6),(b)(7)(C)		Y
F-63	(b)(6),(b)(7)(C)		Y
F-64	(b)(6),(b)(7)(C)		Y
F-65	(b)(6),(b)(7)(C)		Y
F-66	(b)(6),(b)(7)(C)		Y
F-67	(b)(6),(b)(7)(C)		Y
F-68	(b)(6),(b)(7)(C)		Y
F-69	(b)(6),(b)(7)(C)		Y
F-70	(b)(6),(b)(7)(C)		Y
F-71	(b)(6),(b)(7)(C)		Y
F-72	(b)(6),(b)(7)(C)		Y
F-73	(b)(6),(b)(7)(C)		Y
F-74	(b)(6),(b)(7)(C)		Y
F-75	(b)(6),(b)(7)(C)		Y
F-76	(b)(6),(b)(7)(C)		Y
F-77	(b)(6),(b)(7)(C)		Y
F-78	(b)(6),(b)(7)(C)		Y
F-79	(b)(6),(b)(7)(C)		Y
F-80	(b)(6),(b)(7)(C)		Y
F-81	(b)(6),(b)(7)(C)		Y
F-82	(b)(6),(b)(7)(C)		Y
F-83	(b)(6),(b)(7)(C)		Y
F-84	(b)(6),(b)(7)(C)		Y
F-85	(b)(6),(b)(7)(C)		Y
F-86	(b)(6),(b)(7)(C)		Y
F-87	(b)(6),(b)(7)(C)		Y
F-88	(b)(6),(b)(7)(C)		Y
F-89	(b)(6),(b)(7)(C)		Y
F-90	(b)(6),(b)(7)(C)		Y
F-91	(b)(6),(b)(7)(C)		Y
F-92	(b)(6),(b)(7)(C)		Y
F-93	(b)(6),(b)(7)(C)		Y
F-94	(b)(6),(b)(7)(C)		Y
F-95	(b)(6),(b)(7)(C)		Y
F-96	(b)(6),(b)(7)(C)		Y
F-97	(b)(6),(b)(7)(C)		Y
F-98	(b)(6),(b)(7)(C)		Y
F-99	(b)(6),(b)(7)(C)		Y
F-100	(b)(6),(b)(7)(C)		Y

Appendix D: Finding # 2 File Review Student List
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Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-101	(b)(6),(b)(7)(C)		Y
F-102			Y
F-103			Y
F-104			Y
F-105			Y
F-106			Y
F-107			Y
F-108			Y
F-109			Y
F-110			Y
F-111			Y
F-112			Y
F-113			Y
F-114			Y
F-115			Y
F-116			Y
F-117			Y
F-118			Y
F-119			Y
F-120			Y
F-121			Y
F-122			Y
F-123			Y
F-124			Y
F-125			Y
F-126			Y
F-127			Y
F-128			Y
F-129			Y
F-130			Y
F-131			Y
F-132			Y
F-133			Y
F-134			Y
F-135			Y
F-136			Y
F-137			Y
F-138			Y
F-139			Y
F-140			Y
F-141			Y
F-142			Y
F-143			Y
F-144			Y
F-145			Y
F-146			Y
F-147			Y
F-148			Y
F-149			Y
F-150			Y

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-151	(b)(6),(b)(7)(C)		Y
F-152			Y
F-153			Y
F-154			Y
F-155			Y
F-156			Y
F-157			Y
F-158			Y
F-159			Y
F-160			Y
F-161			Y
F-162			Y
F-163			Y
F-164			Y
F-165			Y
F-166			Y
F-167			Y
F-168			Y
F-169			Y
F-170			Y
F-171			Y
F-172			Y
F-173			Y
F-174			Y
F-175			Y
F-176			Y
F-177			Y
F-178			Y
F-179			Y
F-180			Y
F-181			Y
F-182			Y
F-183			Y
F-184			Y
F-185			Y
F-186			Y
F-187			Y
F-188			Y
F-189			Y
F-190			Y
F-191			Y
F-192			Y
F-193			Y
F-194			Y
F-195			Y
F-196			Y
F-197			Y
F-198			Y
F-199			Y
F-200			Y

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Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-201	(b)(6),(b)(7)(C)		Y
F-202			Y
F-203			Y
F-204			Y
F-205			Y
F-206			Y
F-207			Y
F-208			Y
F-209			Y
F-210			Y
F-211			Y
F-212			Y
F-213			Y
F-214			Y
F-215			Y
F-216			Y
F-217			Y
F-218			Y
F-219			Y
F-220			Y
F-221			Y
F-222			Y
F-223			Y
F-224			Y
F-225			Y
F-226			Y
F-227			Y
F-228			Y
F-229			Y
F-230			Y
F-231			Y
F-232			Y
F-233			Y
F-234			Y
F-235			Y
F-236			Y
F-237			Y
F-238			Y
F-239			Y
F-240			Y
F-241			Y
F-242			Y
F-243			Y
F-244			Y
F-245			Y
F-246			Y
F-247			Y
F-248			Y
F-249			Y
F-250			Y

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-251	(b)(6),(b)(7)(C)		Y
F-252			Y
F-253			Y
F-254			Y
F-255			Y
F-256			Y
F-257			Y
F-258			Y
F-259			Y
F-260			Y
F-261			Y
F-262			Y
F-263			Y
F-264			Y
F-265			Y
F-266			Y
F-267			Y
F-268			Y
F-269			Y
F-270			Y
F-271			Y
F-272			Y
F-273			Y
F-274			Y
F-275			Y
F-276			Y
F-277			Y
F-278			Y
F-279			Y
F-280			Y
F-281			Y
F-282			Y
F-283			Y
F-284			Y
F-285			Y
F-286			Y
F-287			Y
F-288			Y
F-289			Y
F-290			Y
F-291			Y
F-292			Y
F-293			Y
F-294			Y
F-295			Y
F-296			Y
F-297			Y
F-298			Y
F-299			Y
F-300			Y

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Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-301	(b)(6),(b)(7)(C)		Y
F-302			Y
F-303			Y
F-304			Y
F-305			Y
F-306			Y
F-307			Y
F-308			Y
F-309			Y
F-310			Y
F-311			Y
F-312			Y
F-313			Y
F-314			Y
F-315			Y
F-316			Y
F-317			Y
F-318			Y
F-319			Y
F-320			Y
F-321			Y
F-322			Y
F-323			Y
F-324			Y
F-325			Y
F-326			Y
F-327			Y
F-328			Y
F-329			Y
F-330			Y
F-331			Y
F-332			Y
F-333			Y
F-334			Y
F-335			Y
F-336			Y
F-337			Y
F-338			Y
F-339			Y
F-340			Y
F-341			Y
F-342			Y
F-343			Y
F-344			Y
F-345			Y
F-346			Y
F-347			Y
F-348			Y
F-349			Y
F-350			Y

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-351	(b)(6),(b)(7)(C)		Y
F-352			Y
F-353			Y
F-354			Y
F-355			Y
F-356			Y
F-357			Y
F-358			Y
F-359			Y
F-360			Y
F-361			Y
F-362			Y
F-363			Y
F-364			Y
F-365			Y
F-366			Y
F-367			Y
F-368			Y
F-369			Y
F-370			Y
F-371			Y
F-372			Y
F-373			Y
F-374			Y
F-375			Y
F-376			Y
F-377			Y
F-378			Y
F-379			Y
F-380			Y
F-381			Y
F-382			Y
F-383			Y
F-384			Y
F-385			Y
F-386			Y
F-387			Y
F-388			Y
F-389			Y
F-390			Y
F-391			Y
F-392			Y
F-393			Y
F-394			Y
F-395			Y
F-396			Y
F-397			Y
F-398			Y
F-399			Y
F-400			Y

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Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-401	(b)(6),(b)(7)(C)		Y
F-402			Y
F-403			Y
F-404			Y
F-405			Y
F-406			Y
F-407			Y
F-408			Y
F-409			Y
F-410			Y
F-411			Y
F-412			Y
F-413			Y
F-414			Y
F-415			Y
F-416			Y
F-417			Y
F-418			Y
F-419			Y
F-420			Y
F-421			Y
F-422			Y
F-423			Y
F-424			Y
F-425			Y
F-426			Y
F-427			Y
F-428			Y
F-429			Y
F-430			Y
F-431			Y
F-432			Y
F-433			Y
F-434			Y
F-435			Y
F-436			Y
F-437			Y
F-438			Y
F-439			Y
F-440			Y
F-441			Y
F-442			Y
F-443			Y
F-444			Y
F-445			Y
F-446			Y
F-447			Y
F-448			Y
F-449			Y
F-450			Y

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-451	(b)(6),(b)(7)(C)		Y
F-452			Y
F-453			Y
F-454			Y
F-455			Y
F-456			Y
F-457			Y
F-458			Y
F-459			Y
F-460			Y
F-461			Y
F-462			Y
F-463			Y
F-464			Y
F-465			Y
F-466			Y
F-467			Y
F-468			Y
F-469			Y
F-470			Y
F-471			Y
F-472			Y
F-473			Y
F-474			Y
F-475			Y
F-476			Y
F-477			Y
F-478			Y
F-479			Y
F-480			Y
F-481			Y
F-482			Y
F-483			Y
F-484			Y
F-485			Y
F-486			Y
F-487			Y
F-488			Y
F-489			Y
F-490			Y
F-491			Y
F-492			Y
F-493			Y
F-494			Y
F-495			Y
F-496			Y
F-497			Y
F-498			Y
F-499			Y
F-500			Y

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Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-501	(b)(6),(b)(7)(C)		Y
F-502			Y
F-503			Y
F-504			Y
F-505			Y
F-506			Y
F-507			Y
F-508			Y
F-509			Y
F-510			Y
F-511			Y
F-512			Y
F-513			Y
F-514			Y
F-515			Y
F-516			Y
F-517			Y
F-518			Y
F-519			Y
F-520			Y
F-521			Y
F-522			Y
F-523			Y
F-524			Y
F-525			Y
F-526			Y
F-527			Y
F-528			Y
F-529			Y
F-530			Y
F-531			Y
F-532			Y
F-533			Y
F-534			Y
F-535			Y
F-536			Y
F-537			Y
F-538			Y
F-539			Y
F-540			Y
F-541			Y
F-542			Y
F-543			Y
F-544			Y
F-545			Y
F-546			Y
F-547			Y
F-548			Y
F-549			Y
F-550			Y

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-551	(b)(6),(b)(7)(C)		Y
F-552			Y
F-553			Y
F-554			Y
F-555			Y
F-556			Y
F-557			Y
F-558			Y
F-559			Y
F-560			Y
F-561			Y
F-562			Y
F-563			Y
F-564			Y
F-565			Y
F-566			Y
F-567			Y
F-568			Y
F-569			Y
F-570			Y
F-571			Y
F-572			Y
F-573			Y
F-574			Y
F-575			Y
F-576			Y
F-577			Y
F-578			Y
F-579			Y
F-580			Y
F-581			Y
F-582			Y
F-583			Y
F-584			Y
F-585			Y
F-586			Y
F-587			Y
F-588			Y
F-589			Y
F-590			Y
F-591			Y
F-592			Y
F-593			Y
F-594			Y
F-595			Y
F-596			Y
F-597			Y
F-598			Y
F-599			Y
F-600			Y

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Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-601	(b)(6),(b)(7)(C)		Y
F-602			Y
F-603			Y
F-604			Y
F-605			Y
F-606			Y
F-607			Y
F-608			Y
F-609			Y
F-610			Y
F-611			Y
F-612			Y
F-613			Y
F-614			Y
F-615			Y
F-616			Y
F-617			Y
F-618			Y
F-619			Y
F-620			Y
F-621			Y
F-622			Y
F-623			Y
F-624			Y
F-625			Y
F-626			Y
F-627			Y
F-628			Y
F-629			Y
F-630			Y
F-631			Y
F-632			Y
F-633			Y
F-634			Y
F-635			Y
F-636			Y
F-637			Y
F-638			Y
F-639			Y
F-640			Y
F-641			Y
F-642			Y
F-643			Y
F-644			Y
F-645			Y
F-646			Y
F-647			Y
F-648			Y
F-649			Y
F-650			Y

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-651	(b)(6),(b)(7)(C)		Y
F-652			Y
F-653			Y
F-654			Y
F-655			Y
F-656			Y
F-657			Y
F-658			Y
F-659			Y
F-660			Y
F-661			Y
F-662			Y
F-663			Y
F-664			Y
F-665			Y
F-666			Y
F-667			Y
F-668			Y
F-669			Y
F-670			Y
F-671			Y
F-672			Y
F-673			Y
F-674			Y
F-675			Y
F-676			Y
F-677			Y
F-678			Y
F-679			Y
F-680			Y
F-681			Y
F-682			Y
F-683			Y
F-684			Y
F-685			Y
F-686			Y
F-687			Y
F-688			Y
F-689			Y
F-690			Y
F-691			Y
F-692			Y
F-693			Y
F-694			Y
F-695			Y
F-696			Y
F-697			Y
F-698			Y
F-699			Y
F-700			Y

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-701	(b)(6),(b)(7)(C)		Y
F-702	(b)(6),(b)(7)(C)		Y
F-703	(b)(6),(b)(7)(C)		Y
F-704	(b)(6),(b)(7)(C)		Y
F-705	(b)(6),(b)(7)(C)		Y
F-706	(b)(6),(b)(7)(C)		Y
F-707	(b)(6),(b)(7)(C)		Y
F-708	(b)(6),(b)(7)(C)		Y
F-709	(b)(6),(b)(7)(C)		Y
F-710	(b)(6),(b)(7)(C)		Y
F-711	(b)(6),(b)(7)(C)		Y
F-712	(b)(6),(b)(7)(C)		Y
F-713	(b)(6),(b)(7)(C)		Y
F-714	(b)(6),(b)(7)(C)		Y
F-715	(b)(6),(b)(7)(C)		Y
F-716	(b)(6),(b)(7)(C)		Y
F-717	(b)(6),(b)(7)(C)		Y
F-718	(b)(6),(b)(7)(C)		Y
F-719	(b)(6),(b)(7)(C)		Y
F-720	(b)(6),(b)(7)(C)		Y
F-721	(b)(6),(b)(7)(C)		Y
F-722	(b)(6),(b)(7)(C)		Y
F-723	(b)(6),(b)(7)(C)		Y
F-724	(b)(6),(b)(7)(C)		Y
F-725	(b)(6),(b)(7)(C)		Y
F-726	(b)(6),(b)(7)(C)		Y
F-727	(b)(6),(b)(7)(C)		Y
F-728	(b)(6),(b)(7)(C)		Y
F-729	(b)(6),(b)(7)(C)		Y
F-730	(b)(6),(b)(7)(C)		Y
F-731	(b)(6),(b)(7)(C)		Y
F-732	(b)(6),(b)(7)(C)		Y
F-733	(b)(6),(b)(7)(C)		Y
F-734	(b)(6),(b)(7)(C)		Y
F-735	(b)(6),(b)(7)(C)		Y
F-736	(b)(6),(b)(7)(C)		Y
F-737	(b)(6),(b)(7)(C)		Y
F-738	(b)(6),(b)(7)(C)		Y
F-739	(b)(6),(b)(7)(C)		Y
F-740	(b)(6),(b)(7)(C)		Y
F-741	(b)(6),(b)(7)(C)		Y
F-742	(b)(6),(b)(7)(C)		Y
F-743	(b)(6),(b)(7)(C)		Y
F-744	(b)(6),(b)(7)(C)		Y
F-745	(b)(6),(b)(7)(C)		Y
F-746	(b)(6),(b)(7)(C)		Y
F-747	(b)(6),(b)(7)(C)		Y
F-748	(b)(6),(b)(7)(C)		Y
F-749	(b)(6),(b)(7)(C)		Y
F-750	(b)(6),(b)(7)(C)		Y

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-751	(b)(6),(b)(7)(C)		Y
F-752	(b)(6),(b)(7)(C)		Y
F-753	(b)(6),(b)(7)(C)		Y
F-754	(b)(6),(b)(7)(C)		Y
F-755	(b)(6),(b)(7)(C)		Y
F-756	(b)(6),(b)(7)(C)		Y
F-757	(b)(6),(b)(7)(C)		Y
F-758	(b)(6),(b)(7)(C)		Y
F-759	(b)(6),(b)(7)(C)		Y
F-760	(b)(6),(b)(7)(C)		Y
F-761	(b)(6),(b)(7)(C)		Y
F-762	(b)(6),(b)(7)(C)		Y
F-763	(b)(6),(b)(7)(C)		Y
F-764	(b)(6),(b)(7)(C)		Y
F-765	(b)(6),(b)(7)(C)		Y
F-766	(b)(6),(b)(7)(C)		Y
F-767	(b)(6),(b)(7)(C)		Y
F-768	(b)(6),(b)(7)(C)		Y
F-769	(b)(6),(b)(7)(C)		Y
F-770	(b)(6),(b)(7)(C)		Y
F-771	(b)(6),(b)(7)(C)		Y
F-772	(b)(6),(b)(7)(C)		Y
F-773	(b)(6),(b)(7)(C)		Y
F-774	(b)(6),(b)(7)(C)		Y
F-775	(b)(6),(b)(7)(C)		Y
F-776	(b)(6),(b)(7)(C)		Y
F-777	(b)(6),(b)(7)(C)		Y
F-778	(b)(6),(b)(7)(C)		Y
F-779	(b)(6),(b)(7)(C)		Y
F-780	(b)(6),(b)(7)(C)		Y
F-781	(b)(6),(b)(7)(C)		Y
F-782	(b)(6),(b)(7)(C)		Y
F-783	(b)(6),(b)(7)(C)		Y
F-784	(b)(6),(b)(7)(C)		Y
F-785	(b)(6),(b)(7)(C)		Y
F-786	(b)(6),(b)(7)(C)		Y
F-787	(b)(6),(b)(7)(C)		Y
F-788	(b)(6),(b)(7)(C)		Y
F-789	(b)(6),(b)(7)(C)		Y
F-790	(b)(6),(b)(7)(C)		Y
F-791	(b)(6),(b)(7)(C)		Y
F-792	(b)(6),(b)(7)(C)		Y
F-793	(b)(6),(b)(7)(C)		Y
F-794	(b)(6),(b)(7)(C)		Y
F-795	(b)(6),(b)(7)(C)		Y
F-796	(b)(6),(b)(7)(C)		Y
F-797	(b)(6),(b)(7)(C)		Y
F-798	(b)(6),(b)(7)(C)		Y
F-799	(b)(6),(b)(7)(C)		Y
F-800	(b)(6),(b)(7)(C)		Y

Appendix D: Finding # 2 File Review Student List
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Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-801	(b)(6),(b)(7)(C)		Y
F-802			Y
F-803			Y
F-804			Y
F-805			Y
F-806			Y
F-807			Y
F-808			Y
F-809			Y
F-810			Y
F-811			Y
F-812			Y
F-813			Y
F-814			Y
F-815			Y
F-816			Y
F-817			Y
F-818			Y
F-819			Y
F-820			Y
F-821			Y
F-822			Y
F-823			Y
F-824			Y
F-825			Y
F-826			Y
F-827			Y
F-828			Y
F-829			Y
F-830			Y
F-831			Y
F-832			Y
F-833			Y
F-834			Y
F-835			Y
F-836			Y
F-837			Y
F-838			Y
F-839			Y
F-840			Y
F-841			Y
F-842			Y
F-843			Y
F-844			Y
F-845			Y
F-846			Y
F-847			Y
F-848			Y
F-849			Y
F-850			Y

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-851	(b)(6),(b)(7)(C)		Y
F-852			Y
F-853			Y
F-854			Y
F-855			Y
F-856			Y
F-857			Y
F-858			Y
F-859			Y
F-860			Y
F-861			Y
F-862			Y
F-863			Y
F-864			Y
F-865			Y
F-866			Y
F-867			Y
F-868			Y
F-869			Y
F-870			Y
F-871			Y
F-872			Y
F-873			Y
F-874			Y
F-875			Y
F-876			Y
F-877			Y
F-878			Y
F-879			Y
F-880			Y
F-881			Y
F-882			Y
F-883			Y
F-884			Y
F-885			Y
F-886			Y
F-887			Y
F-888			Y
F-889			Y
F-890			Y
F-891			Y
F-892			Y
F-893			Y
F-894			Y
F-895			Y
F-896			Y
F-897			Y
F-898			Y
F-899			Y
F-900			Y

Appendix D: Finding # 2 File Review Student List
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Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-901	(b)(6),(b)(7)(C)		Y
F-902			Y
F-903			Y
F-904			Y
F-905			Y
F-906			Y
F-907			Y
F-908			Y
F-909			Y
F-910			Y
F-911			Y
F-912			Y
F-913			Y
F-914			Y
F-915			Y
F-916			Y
F-917			Y
F-918			Y
F-919			Y
F-920			Y
F-921			Y
F-922			Y
F-923			Y
F-924			Y
F-925			Y
F-926			Y
F-927			Y
F-928			Y
F-929			Y
F-930			Y
F-931			Y
F-932			Y
F-933			Y
F-934			Y
F-935			Y
F-936			Y
F-937			Y
F-938			Y
F-939			Y
F-940			Y
F-941			Y
F-942			Y
F-943			Y
F-944			Y
F-945			Y
F-946			Y
F-947			Y
F-948			Y
F-949			Y
F-950			Y

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-951	(b)(6),(b)(7)(C)		Y
F-952			Y
F-953			Y
F-954			Y
F-955			Y
F-956			Y
F-957			Y
F-958			Y
F-959			Y
F-960			Y
F-961			Y
F-962			Y
F-963			Y
F-964			Y
F-965			Y
F-966			Y
F-967			Y
F-968			Y
F-969			Y
F-970			Y
F-971			Y
F-972			Y
F-973			Y
F-974			Y
F-975			Y
F-976			Y
F-977			Y
F-978			Y
F-979			Y
F-980			Y
F-981			Y
F-982			Y
F-983			Y
F-984			Y
F-985			Y
F-986			Y
F-987			Y
F-988			Y
F-989			Y
F-990			Y
F-991			Y
F-992			Y
F-993			Y
F-994			Y
F-995			Y
F-996			Y
F-997			Y
F-998			Y
F-999			Y
F-1000			Y

Appendix D: Finding # 2 File Review Student List
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Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-1001	(b)(6),(b)(7)(C)		Y
F-1002			Y
F-1003			Y
F-1004			Y
F-1005			Y
F-1006			Y
F-1007			Y
F-1008			Y
F-1009			Y
F-1010			Y
F-1011			Y
F-1012			Y
F-1013			Y
F-1014			Y
F-1015			Y
F-1016			Y
F-1017			Y
F-1018			Y
F-1019			Y
F-1020			Y
F-1021			Y
F-1022			Y
F-1023			Y
F-1024			Y
F-1025			Y
F-1026			Y
F-1027			Y
F-1028			Y
F-1029			Y
F-1030			Y
F-1031			Y
F-1032			Y
F-1033			Y
F-1034			Y
F-1035			Y
F-1036			Y
F-1037			Y
F-1038			Y
F-1039			Y
F-1040			Y
F-1041			Y
F-1042			Y
F-1043			Y
F-1044			Y
F-1045			Y
F-1046			Y
F-1047			Y
F-1048			Y
F-1049			Y
F-1050			Y

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-1051	(b)(6),(b)(7)(C)		Y
F-1052			Y
F-1053			Y
F-1054			Y
F-1055			Y
F-1056			Y
F-1057			Y
F-1058			Y
F-1059			Y
F-1060			Y
F-1061			Y
F-1062			Y
F-1063			Y
F-1064			Y
F-1065			Y
F-1066			Y
F-1067			Y
F-1068			Y
F-1069			Y
F-1070			Y
F-1071			Y
F-1072			Y
F-1073			Y
F-1074			Y
F-1075			Y
F-1076			Y
F-1077			Y
F-1078			Y
F-1079			Y
F-1080			Y
F-1081			Y
F-1082			Y
F-1083			Y
F-1084			Y
F-1085			Y
F-1086			Y
F-1087			Y
F-1088			Y
F-1089			Y
F-1090			Y
F-1091			Y
F-1092			Y
F-1093			Y
F-1094			Y
F-1095			Y
F-1096			Y
F-1097			Y
F-1098			Y
F-1099			Y
F-1100			Y

Appendix D: Finding # 2 File Review Student List
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Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-1101	(b)(6),(b)(7)(C)		Y
F-1102	(b)(6),(b)(7)(C)		Y
F-1103	(b)(6),(b)(7)(C)		Y
F-1104	(b)(6),(b)(7)(C)		Y
F-1105	(b)(6),(b)(7)(C)		Y
F-1106	(b)(6),(b)(7)(C)		Y
F-1107	(b)(6),(b)(7)(C)		Y
F-1108	(b)(6),(b)(7)(C)		Y
F-1109	(b)(6),(b)(7)(C)		Y
F-1110	(b)(6),(b)(7)(C)		Y
F-1111	(b)(6),(b)(7)(C)		Y
F-1112	(b)(6),(b)(7)(C)		Y
F-1113	(b)(6),(b)(7)(C)		Y
F-1114	(b)(6),(b)(7)(C)		Y
F-1115	(b)(6),(b)(7)(C)		Y
F-1116	(b)(6),(b)(7)(C)		Y
F-1117	(b)(6),(b)(7)(C)		Y
F-1118	(b)(6),(b)(7)(C)		Y
F-1119	(b)(6),(b)(7)(C)		Y
F-1120	(b)(6),(b)(7)(C)		Y
F-1121	(b)(6),(b)(7)(C)		Y
F-1122	(b)(6),(b)(7)(C)		Y
F-1123	(b)(6),(b)(7)(C)		Y
F-1124	(b)(6),(b)(7)(C)		Y
F-1125	(b)(6),(b)(7)(C)		Y
F-1126	(b)(6),(b)(7)(C)		Y
F-1127	(b)(6),(b)(7)(C)		Y
F-1128	(b)(6),(b)(7)(C)		Y
F-1129	(b)(6),(b)(7)(C)		Y
F-1130	(b)(6),(b)(7)(C)		Y
F-1131	(b)(6),(b)(7)(C)		Y
F-1132	(b)(6),(b)(7)(C)		Y
F-1133	(b)(6),(b)(7)(C)		Y
F-1134	(b)(6),(b)(7)(C)		Y
F-1135	(b)(6),(b)(7)(C)		Y
F-1136	(b)(6),(b)(7)(C)		Y
F-1137	(b)(6),(b)(7)(C)		Y
F-1138	(b)(6),(b)(7)(C)		Y
F-1139	(b)(6),(b)(7)(C)		Y
F-1140	(b)(6),(b)(7)(C)		Y
F-1141	(b)(6),(b)(7)(C)		Y
F-1142	(b)(6),(b)(7)(C)		Y
F-1143	(b)(6),(b)(7)(C)		Y
F-1144	(b)(6),(b)(7)(C)		Y
F-1145	(b)(6),(b)(7)(C)		Y
F-1146	(b)(6),(b)(7)(C)		Y
F-1147	(b)(6),(b)(7)(C)		Y
F-1148	(b)(6),(b)(7)(C)		Y
F-1149	(b)(6),(b)(7)(C)		Y
F-1150	(b)(6),(b)(7)(C)		Y

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-1151	(b)(6),(b)(7)(C)		Y
F-1152	(b)(6),(b)(7)(C)		Y
F-1153	(b)(6),(b)(7)(C)		Y
F-1154	(b)(6),(b)(7)(C)		Y
F-1155	(b)(6),(b)(7)(C)		Y
F-1156	(b)(6),(b)(7)(C)		Y
F-1157	(b)(6),(b)(7)(C)		Y
F-1158	(b)(6),(b)(7)(C)		Y
F-1159	(b)(6),(b)(7)(C)		Y
F-1160	(b)(6),(b)(7)(C)		Y
F-1161	(b)(6),(b)(7)(C)		Y
F-1162	(b)(6),(b)(7)(C)		Y
F-1163	(b)(6),(b)(7)(C)		Y
F-1164	(b)(6),(b)(7)(C)		Y
F-1165	(b)(6),(b)(7)(C)		Y
F-1166	(b)(6),(b)(7)(C)		Y
F-1167	(b)(6),(b)(7)(C)		Y
F-1168	(b)(6),(b)(7)(C)		Y
F-1169	(b)(6),(b)(7)(C)		Y
F-1170	(b)(6),(b)(7)(C)		Y
F-1171	(b)(6),(b)(7)(C)		Y
F-1172	(b)(6),(b)(7)(C)		Y
F-1173	(b)(6),(b)(7)(C)		Y
F-1174	(b)(6),(b)(7)(C)		Y
F-1175	(b)(6),(b)(7)(C)		Y
F-1176	(b)(6),(b)(7)(C)		Y
F-1177	(b)(6),(b)(7)(C)		Y
F-1178	(b)(6),(b)(7)(C)		Y
F-1179	(b)(6),(b)(7)(C)		Y
F-1180	(b)(6),(b)(7)(C)		Y
F-1181	(b)(6),(b)(7)(C)		Y
F-1182	(b)(6),(b)(7)(C)		Y
F-1183	(b)(6),(b)(7)(C)		Y
F-1184	(b)(6),(b)(7)(C)		Y
F-1185	(b)(6),(b)(7)(C)		Y
F-1186	(b)(6),(b)(7)(C)		Y
F-1187	(b)(6),(b)(7)(C)		Y
F-1188	(b)(6),(b)(7)(C)		Y
F-1189	(b)(6),(b)(7)(C)		Y
F-1190	(b)(6),(b)(7)(C)		Y
F-1191	(b)(6),(b)(7)(C)		Y
F-1192	(b)(6),(b)(7)(C)		Y
F-1193	(b)(6),(b)(7)(C)		Y
F-1194	(b)(6),(b)(7)(C)		Y
F-1195	(b)(6),(b)(7)(C)		Y
F-1196	(b)(6),(b)(7)(C)		Y
F-1197	(b)(6),(b)(7)(C)		Y
F-1198	(b)(6),(b)(7)(C)		Y
F-1199	(b)(6),(b)(7)(C)		Y
F-1200	(b)(6),(b)(7)(C)		Y

Appendix D: Finding # 2 File Review Student List
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Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-1201	(b)(6),(b)(7)(C)		Y
F-1202			Y
F-1203			Y
F-1204			Y
F-1205			Y
F-1206			Y
F-1207			Y
F-1208			Y
F-1209			Y
F-1210			Y
F-1211			Y
F-1212			Y
F-1213			Y
F-1214			Y
F-1215			Y
F-1216			Y
F-1217			Y
F-1218			Y
F-1219			Y
F-1220			Y
F-1221			Y
F-1222			Y
F-1223			Y
F-1224			Y
F-1225			Y
F-1226			Y
F-1227			Y
F-1228			Y
F-1229			Y
F-1230			Y
F-1231			Y
F-1232			Y
F-1233			Y
F-1234			Y
F-1235			Y
F-1236			Y
F-1237			Y
F-1238			Y
F-1239			Y
F-1240			Y
F-1241			Y
F-1242			Y
F-1243			Y
F-1244			Y
F-1245			Y
F-1246			Y
F-1247			Y
F-1248			Y
F-1249			Y
F-1250			Y

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-1251	(b)(6),(b)(7)(C)		Y
F-1252			Y
F-1253			Y
F-1254			Y
F-1255			Y
F-1256			Y
F-1257			Y
F-1258			Y
F-1259			Y
F-1260			Y
F-1261			Y
F-1262			Y
F-1263			Y
F-1264			Y
F-1265			Y
F-1266			Y
F-1267			Y
F-1268			Y
F-1269			Y
F-1270			Y
F-1271			Y
F-1272			Y
F-1273			Y
F-1274			Y
F-1275			Y
F-1276			Y
F-1277			Y
F-1278			Y
F-1279			Y
F-1280			Y
F-1281			Y
F-1282			Y
F-1283			Y
F-1284			Y
F-1285			Y
F-1286			Y
F-1287			Y
F-1288			Y
F-1289			Y
F-1290			Y
F-1291			Y
F-1292			Y
F-1293			Y
F-1294			Y
F-1295			Y
F-1296			Y
F-1297			Y
F-1298			Y
F-1299			Y
F-1300			Y

Appendix D: Finding # 2 File Review Student List
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Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-1301	(b)(6),(b)(7)(C)		Y
F-1302			Y
F-1303			Y
F-1304			Y
F-1305			Y
F-1306			Y
F-1307			Y
F-1308			Y
F-1309			Y
F-1310			Y
F-1311			Y
F-1312			Y
F-1313			Y
F-1314			Y
F-1315			Y
F-1316			Y
F-1317			Y
F-1318			Y
F-1319			Y
F-1320			Y
F-1321			Y
F-1322			Y
F-1323			Y
F-1324			Y
F-1325			Y
F-1326			Y
F-1327			Y
F-1328			Y
F-1329			Y
F-1330			Y
F-1331	Y		
F-1332	Y		
F-1333	Y		
F-1334	Y		
F-1335	Y		
F-1336	Y		
F-1337	Y		
F-1338	Y		
F-1339	Y		
F-1340	Y		
F-1341	Y		
F-1342	Y		
F-1343	Y		
F-1344	Y		
F-1345	Y		
F-1346	Y		
F-1347	Y		
F-1348	Y		
F-1349	Y		
F-1350	Y		

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-1351	(b)(6),(b)(7)(C)		Y
F-1352			Y
F-1353			Y
F-1354			Y
F-1355			Y
F-1356			Y
F-1357			Y
F-1358			Y
F-1359			Y
F-1360			Y
F-1361			Y
F-1362			Y
F-1363			Y
F-1364			Y
F-1365			Y
F-1366			Y
F-1367			Y
F-1368			Y
F-1369			Y
F-1370			Y
F-1371			Y
F-1372			Y
F-1373			Y
F-1374			Y
F-1375			Y
F-1376			Y
F-1377			Y
F-1378			Y
F-1379			Y
F-1380			Y
F-1381	Y		
F-1382	Y		
F-1383	Y		
F-1384	Y		
F-1385	Y		
F-1386	Y		
F-1387	Y		
F-1388	Y		
F-1389	Y		
F-1390	Y		
F-1391	Y		
F-1392	Y		
F-1393	Y		
F-1394	Y		
F-1395	Y		
F-1396	Y		
F-1397	Y		
F-1398	Y		
F-1399	Y		
F-1400	Y		

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Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-1401	(b)(6),(b)(7)(C)		Y
F-1402			Y
F-1403			Y
F-1404			Y
F-1405			Y
F-1406			Y
F-1407			Y
F-1408			Y
F-1409			Y
F-1410			Y
F-1411			Y
F-1412			Y
F-1413			Y
F-1414			Y
F-1415			Y
F-1416			Y
F-1417			Y
F-1418			Y
F-1419			Y
F-1420			Y
F-1421			Y
F-1422			Y
F-1423			Y
F-1424			Y
F-1425			Y
F-1426			Y
F-1427			Y
F-1428			Y
F-1429			Y
F-1430			Y
F-1431			Y
F-1432			Y
F-1433			Y
F-1434			Y
F-1435			Y
F-1436			Y
F-1437			Y
F-1438			Y
F-1439			Y
F-1440			Y
F-1441			Y
F-1442			Y
F-1443			Y
F-1444			Y
F-1445			Y
F-1446			Y
F-1447			Y
F-1448			Y
F-1449			Y
F-1450			Y

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-1451	(b)(6),(b)(7)(C)		Y
F-1452			Y
F-1453			Y
F-1454			Y
F-1455			Y
F-1456			Y
F-1457			Y
F-1458			Y
F-1459			Y
F-1460			Y
F-1461			Y
F-1462			Y
F-1463			Y
F-1464			Y
F-1465			Y
F-1466			Y
F-1467			Y
F-1468			Y
F-1469			Y
F-1470			Y
F-1471			Y
F-1472			Y
F-1473			Y
F-1474			Y
F-1475			Y
F-1476			Y
F-1477			Y
F-1478			Y
F-1479			Y
F-1480			Y
F-1481			Y
F-1482			Y
F-1483			Y
F-1484			Y
F-1485			Y
F-1486			Y
F-1487			Y
F-1488			Y
F-1489			Y
F-1490			Y
F-1491			Y
F-1492			Y
F-1493			Y
F-1494			Y
F-1495			Y
F-1496			Y
F-1497			Y
F-1498			Y
F-1499			Y
F-1500			Y

Appendix D: Finding # 2 File Review Student List

PRCN #: 201320328222

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
F-1501	(b)(6),(b)(7)(C)		Y
F-1502			Y
F-1503			Y
F-1504			Y
F-1505			Y
F-1506			Y
F-1507			Y
F-1508			Y
F-1509			Y
F-1510			Y
F-1511			Y
F-1512			Y
F-1513			Y
F-1514			Y
F-1515			Y
F-1516			Y
F-1517			Y
F-1518			Y
F-1519			Y
F-1520			Y

Student #	Student Name	Social Security Number	HS/GED Transcript Received?
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Appendix E: Finding # 2 Liability Calculation
 PRCN #: 201320328222

Student#	Name	SS#	HS/GED Transcript Received?	Start Date	Award year	11-12 Pell	11-12 SEOG	11-12 Sub	11-12 Unsub	12-13 Pell	12-13 SEOG	12-13 Sub	12-13 Unsub
						\$	\$	\$	\$	\$	\$	\$	\$
F-1			N	09/06/11	11-12	1,150	0	0	0	0	0	0	0
F-2			N	03/12/12	11-12	3,469	0	3,484	5,972	0	0	0	0
F-3			N	09/06/11	11-12	1,500	498	1,742	2,986	0	0	0	0
F-4			N	01/09/12	11-12	1,131	0	0	0	0	0	0	0
F-5			N	09/06/11	11-12	694	0	555	0	0	0	0	0
F-6			N	03/12/12	11-12	2,775	0	2,613	4,478	0	0	0	0
F-7			N	01/09/12	11-12	2,082	0	1,742	2,986	0	0	0	0
F-8			N	05/15/12	11-12	278	0	871	1,219	0	0	0	0
F-9			N	01/09/12	11-12	825	0	607	996	0	0	0	0
F-10			N	05/15/12	11-12	0	0	867	135	0	0	0	0
F-11			N	09/06/11	11-12	2,082	200	1,742	2,986	0	0	0	0
F-12			N	01/09/12	11-12	795	0	0	0	0	0	0	0
F-13			N	01/09/12	11-12	2,775	0	1,562	0	0	0	0	0
F-14			N	08/27/12	12-13	0	0	0	0	1,388	0	1,734	2,970
F-15			N	09/06/11	11-12	0	0	0	1,385	0	0	0	0
F-16			N	01/09/12	11-12	4,857	0	3,303	2,986	0	0	0	0
F-17			N	03/12/12	11-12	2,775	0	3,484	5,974	0	0	0	0
F-18			N	01/09/12	11-12	475	0	1,742	0	0	0	0	0
F-19			N	10/27/11	11-12	1,388	0	1,742	661	0	0	0	0
F-20			N	03/12/12	11-12	1,388	0	1,742	2,986	694	0	1,733	1,523
F-21			N	10/25/12	12-13	0	0	0	0	1,388	0	1,733	673
F-22			N	09/06/11	11-12	1,324	0	436	1,493	0	0	0	0
F-23			N	10/27/11	11-12	694	0	0	0	0	0	0	0
F-24			N	01/09/12	11-12	1,388	0	871	224	0	0	0	0
F-25			N	10/27/11	11-12	1,388	0	857	0	0	0	0	0
F-26			N	09/06/11	11-12	386	0	0	0	0	0	0	0
F-27			N	01/09/12	11-12	1,578	0	1,742	996	0	0	0	0
F-28			N	09/06/11	11-12	590	0	0	0	0	0	0	0
F-29			N	03/12/12	11-12	0	0	3,484	5,971	0	0	0	0
F-30			N	10/27/11	11-12	1,388	200	1,742	1,170	0	0	0	0
F-31			N	03/12/12	11-12	2,775	0	3,484	1,992	0	0	0	0
F-31			N	09/06/11	11-12	694	0	123	0	0	0	0	0

Appendix E: Finding # 2 Liability Calculation
 PRCN #: 201320328222

Student#	Name	SS#	HS/GED Transcript Received?	Start Date	Award Year	11-12 Pell	11-12 SEOG	11-12 Sub	11-12 Unsub	12-13 Pell	12-13 SEOG	12-13 Sub	12-13 Unsub
F-32	(b)(6),(b)(7)(C)		N	09/06/11	11-12	2,005	0	0	0	0	0	0	0
F-33			N	09/06/11	11-12	372	0	0	0	0	0	0	0
F-34			N	09/06/11	11-12	957	0	736	0	0	0	0	0
F-35			N	05/15/12	11-12	55	0	0	0	0	0	0	0
F-36			N	10/27/11	11-12	103	0	0	0	0	0	0	0
F-37			N	01/09/12	11-12	278	0	1,742	2,985	0	0	0	0
F-38			N	09/06/11	11-12	1,388	0	0	0	0	0	0	0
F-39			N	08/27/12	12-13	0	0	0	0	487	0	0	0
F-40			N	10/27/11	11-12	1,388	0	871	377	0	0	0	0
F-41			N	09/06/11	11-12	722	0	0	0	0	0	0	0
F-42			N	05/15/12	11-12	1,388	0	1,742	503	0	0	0	0
F-43			N	09/06/11	11-12	2,082	0	1,742	2,986	0	0	0	0
F-44			N	03/12/12	11-12	2,775	0	3,484	5,972	1,388	0	867	130
F-45			N	09/06/11	11-12	0	0	1,742	2,986	0	0	0	0
F-46			N	08/27/12	12-13	0	0	0	0	1,388	0	1,734	357
F-47			N	09/06/11	11-12	1,388	0	871	785	0	0	0	0
F-48			N	09/06/11	11-12	0	0	498	1,866	0	0	0	0
F-49			N	01/09/12	11-12	926	0	871	1,476	0	0	0	0
F-50			N	09/06/11	11-12	3,415	200	1,742	2,986	0	0	0	0
F-51			N	01/09/12	11-12	2,775	0	2,613	2,924	0	0	0	0
F-52			N	03/12/12	11-12	1,388	0	1,742	884	0	0	0	0
F-53			N	01/09/12	11-12	2,082	0	1,742	837	0	0	0	0
F-54			N	09/06/11	11-12	1,388	0	1,742	1,518	0	0	0	0
F-55			N	09/06/11	11-12	0	0	0	5,106	0	0	0	0
F-56			N	09/06/11	11-12	155	0	0	0	0	0	0	0
F-57			N	03/12/12	11-12	2,776	0	3,484	5,972	0	0	0	0
F-58			N	01/09/12	11-12	0	0	0	3,562	0	0	0	0
F-59			N	05/15/12	11-12	0	0	758	0	0	0	0	0
TOTAL:						\$72,450	\$1,098	\$68,659	\$91,521	\$67,733	\$0	\$7,801	\$5,653

Appendix F - Estimated Loss Formula for Finding # 2
 PRCN #: 201320328222

Estimated Loss Formula

8/29/2012

Enter Institution Name Peirce College
 Select Institution Type 4 Yr

	Select Type of Loan	Select Award Year	Enter Ineligible Loan Amount	Enter School CDR	Total Subsidy Costs	Estimated Loss Liability
1	DL Subsidized	2011-2012	\$ 68,659.00	11.80%	3.16%	\$ 2,167.56
2	DL Unsubsidized	2011-2012	\$ 91,321.00	11.80%	-26.64%	\$ -
3						
	Description		\$ 159,980.00			\$ 2,167.56
4	DL Subsidized	2012-2013	\$ 7,801.00	11.80%	0.00%	\$ -
5	DL Unsubsidized	2012-2013	\$ 5,653.00	11.80%	0.00%	\$ -
6						
	Description		\$ 13,454.00			\$ -
7						
8						
9						
	Description		\$ -			\$ -
10						
11						
12						
	Description		\$ -			\$ -
Original Ineligible Loan Liability			\$ 173,434.00	Total Estimated Loss		\$ 2,167.56

Appendix F - Estimated Loss Formula for Finding # 2
 PRCN #: 201320328222

To calculate estimated loss for a given ineligible loan amount, that amount is multiplied by the total subsidy rates calculated for the ineligible loans. Consolidation Loans will be obtained in the future to prepay some of the ineligible loans; the amount of Consolidation Loans divided by the ineligible Stafford/PLUS loans equals the "Consolidation prepayment rate" (H) for those loans.

The Department's Budget Office calculates, on an annual basis, the rate per dollar of loan of default subsidies (DSRs) and all other subsidies (OSRs) (D & F) for Stafford and PLUS Loans, by cohort year, program, loan type, and risk group (note that 2008-2010 FFEL loan costs are calculated only by cohort year).

	A	B	C	D	E	F	G	H	I	J
	School CDR	Sector CDR*	Ratio **	DSR ***	Adjusted DSR	OSR ***	Avg Cons Year	Cons Prepay %	Cons DSR ***	Cons OS ***
1	11.80%	7.30%	1.62	2.44%	3.95%	-2.22%	2018	31.8%	3.19%	1.30%
2	11.80%	7.30%	1.62	2.28%	3.69%	-31.28%	2018	40.2%	3.39%	-1.02%
3										
4	11.80%	7.30%	1.62	0.00%	0.00%	0.00%	0	0.0%	0.00%	0.00%
5	11.80%	7.30%	1.62	0.00%	0.00%	0.00%	0	0.0%	0.00%	0.00%
6										
7										
8										
9										
10										
11										
12										

Federal Student Aid (FSA) calculates the cohort default rates (CDRs) of the institution (A), and the average CDR for the sector for that institution (B). FSA applies the CDR comparison ratio (C), $[A/B = C]$ against the Budget Office's cohort loan DSR (D) to determine the default subsidy rate for the institution (E). The Budget Office estimates the default subsidy rate and other subsidy rate for the Consolidation Loans that will prepay some of these Stafford and PLUS Loans (I & J).

The total subsidy rate for the ineligible Stafford and PLUS Loans is $((E+F) + ((I+J) \times H))$.

The total subsidy cost for these loans is the ineligible loan amount multiplied by the total subsidy rate.

