



July 10, 2014

Mr. William Keller
President
Professional Careers Institute
6666 Harwin, Suite 160
Houston, TX 77036

Certified Mail
Return Receipt Requested
7012 1010 0002 6534 1885

RE: **Expedited Final Program Review Determination Letter**
OPE ID: 03944400
PRCN: 201430628666

Dear Mr. Keller:

From June 16, 2014 through June 20, 2014, Ms. MaEsther Francis and Mr. Bruce Anderson conducted a review of Professional Careers Institute's (PCI'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 purpose of this Final Program Review Determination Letter is to close the program review.

The focus of the review was to determine PCI's compliance with the statutes and federal 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 PCI's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files was identified for review from the 2012-2013 and 2013-2014 (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 the award year.

A list containing the names and social security numbers of the students whose files were examined was provided to PCI during the program review.

Protection of Personally Identifiable Information (PII):

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

Federal Student Aid

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

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

The issuance of this FPRD does not preclude the Department from conducting additional testing for any area of non-compliance identified herein in a subsequent program review or compliance audit for the award years included in the scope of this program review.

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

Program Findings and Final Program Review Determinations:

Finding 1. Return to Title IV (R2T4) Policy Inadequate

Citation: Institutions are required to have a Return of Title IV Funds (R2T4) policy that clearly outlines the requirements for the treatment of Title IV, HEA funds when a student withdraws. The policy must identify the process for officially withdrawing from the school as well as a summary of the requirements for returning funds, including but not limited to, the effects of withdrawing, post-withdrawal disbursement information, how the institution will determine the withdrawal date for students who unofficially withdraw, and the timeframe and order for the return of funds. *34 C.F.R. §§ 668.16(h) and 668.22*

When a recipient of Title IV grant or loan assistance withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, the institution must determine the amount of Title IV grant or loan assistance that the student earned as of the student's withdrawal date. *34 C.F.R. § 668.22(a)*

Noncompliance: The R2T4 policy provided to students is incomplete. Specifically, PCI's policy does not include the following:

- An estimate of the amount of aid earned or that may need to be returned.

Required Action: During the Program Review PCI revised its R2T4 policy to include an estimate of the amount of aid earned or that may be returned. Therefore, no further action is required.

Final Program Review Determination: PCI resolved the finding during the program review. Therefore, PCI may consider this finding closed, with no further action required.

Finding 2. Satisfactory Academic Progress (SAP) Policy not Adequately Developed

Citation: The following definitions apply to terms used in the satisfactory academic progress (SAP) policy:

- Appeal – a process by which a student who is not meeting the institution’s satisfactory academic progress standards petitions the institution for reconsideration of the student’s eligibility for Title IV, HEA program assistance.
- Financial aid probation – a status assigned by an institution to a student who fails to make satisfactory academic progress and who has appealed and has had eligibility reinstated.
- Financial aid warning – a status assigned to a student who fails to make satisfactory academic progress at an institution that evaluates academic progress at the end of each payment period.

34 CFR 668.34(b)

Noncompliance: PCI did not clearly define the process by which a student who is not meeting the SAP requirements may appeal to the institution for reconsideration of financial aid eligibility. Also, PCI did not include the financial aid probation status in its SAP policy for a student whose appeal was granted and eligibility reinstated.

Required Action: During the Program Review, PCI revised its SAP policy to include a clearly defined SAP appeal process and the requirements for assigning the financial aid probation status to a student. Therefore, no further action is required.

Final Program Review Determination: PCI resolved the finding during the program review. Therefore, PCI may consider this finding closed, with no further action required.

Finding 3. Late Student Status Confirmation Reporting

Citation: Upon receipt of a student status confirmation report from the Secretary for institutions participating in the Direct Loan Program, changes in enrollment to less than half-time, graduated, or withdrawn must be reported within 30 days of receipt, unless an institution expects to submit its next student status confirmation report within 60 days. *34 C.F.R. § 685.309(b)*

Noncompliance: PCI’s SSCR Reporting policy states “SSCR Reporting will be conducted every 60 days on the following schedule: February, April, June, August, October, and December”. PCI accurately reported changes in enrollment status for all required students sampled during the program review. However, it did not report changes in the enrollment status in a timely manner during the 2012-2013 and 2013-2014 award years for Students #1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 20, 21, 27, 29, and 30 to the National Student Loan Data System (NSLDS).

Required Action: To prevent the occurrence of this finding in the future, PCI must report changes in enrollment for students participating in the Direct Loan Program in a timely manner according to institutional policy.

Final Program Review Determination: PCI concurred with the finding and agreed to take the corrective actions necessary to prevent this finding in the future by adhering to its institutional SSCR Reporting policy for reporting changes in enrollment. PCI's administrative staff will comply with the SSCR Reporting policy for timely submissions of changes in enrollment status to NSLDS. Therefore, PCI may consider this finding closed, with no further action required.

Record Retention:

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

We would like to express our appreciation for the courtesy and cooperation extended during the review. If you have any questions concerning this report, please call Ms. MaEsther Francis at 214-661-9456.

Sincerely,

(b)(6)

Cynthia Thornton, Director
Dallas School Participation Division

cc: Ms. Gena Gentry, Financial Aid Administrator
Texas Workforce Commission-Division of Proprietary School & Veterans Education
Accrediting Council for Continuing Education & Training

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 Professional Careers Institute
 6666 Harwin Dr Ste 160
 Houston, TX 77036-2252

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