



February 26, 2014

Clint Matthews
CEO/President
Reading Hospital School of Health Sciences
6th Avenue & Spruce Street
West Reading, PA 19611-1744

Certified Mail
Return Receipt Requested
1ZA87964029198462

RE: Final Program Review Determination
OPE ID: 00656500
PRCN: 201140327655

Dear Mr. Matthews:

The U.S. Department of Education's (Department's) School Participation Division - Philadelphia issued a program review report on August 23, 2013 covering Reading Hospital School of Health Sciences' (RHSHS) 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 2009-2010 and 2010-2011 award years. RHSHS' final response was received on October 21, 2012. A copy of the program review report (and related attachments) and RHSHS' response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by RHSHS 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, (3) notify the institution of its right to appeal, and (4) close the review.

The total liabilities due from the institution from this program review are \$1,037.40.

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). 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. Some appendices within this report contain PII. The appendices were encrypted and sent separately to the institution via e-mail. Please see the enclosure Protection of Personally Identifiable Information for instructions regarding submission to the Department of required data / documents containing PII.

Appeal Procedures:

This constitutes the Department's FPRD with respect to the liabilities identified from the August 23, 2013 program review report. If RHSHS 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 RHSHS receives this FPRD. An original and four copies of the information RHSHS 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

RHSHS' 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 RSHS' 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).

If the institution has any questions regarding this letter, please contact Mr. Stephen Conger at 215-656-5898. 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); (b)(7)(C)

Nancy Paula Gifford
Division Director

Enclosure:

Protection of Personally Identifiable Information
Program Review Report (and appendices)
Final Program Review Determination Report (and appendices)

cc: Robin Hall, Director of Financial Aid and Budgets

Prepared for

Reading Hospital School of
Health Sciences

Federal Student Aid
AN OFFICE of the U.S. DEPARTMENT of EDUCATION

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OPE ID 00656500
PRCN 201140327655

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

Final Program Review Determination
February 26, 2014

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A. Institutional Information

Reading Hospital School of Health Sciences
6th Avenue & Spruce Street
West Reading, PA 19611-1744

Type: private nonprofit

Highest Level of Offering: non-degree 3 plus years

Accrediting Agency: National League for Nursing Accrediting Commission

Current Student Enrollment: 410 Students (2011-2012)

% of Students Receiving Title IV, HEA funds: 68% (2011-2012)

Title IV, HEA Program Participation (as of September 23, 2013):

	2011-2012 Award Year
Federal Pell Grant Program	\$491,278.00
William D. Ford Federal Direct Loan Program	\$2,426,590.00
Total	\$2,917,868.00

Default Rate FFEI/DL:	2010 2.5%
	2009 3.4%
	2008 2.9%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Reading Hospital School of Health Sciences (RHSHS) from August 29, 2011 to September 1, 2011. The review was conducted by Mr. Stephen Conger and Ms. Shein Dossa.

The focus of the review was the academic year definition for a clock hour school. The review consisted of an examination of RHSHS' 2009-2010 and 2010-2011 award year students that received Title IV, HEA funds.

A sample of 30 files was identified for review from the 2009-2010 and 2010-2011 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 RHSHS' specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve RHSHS' 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

Finding #2

RHSHS has taken the corrective actions necessary to resolve finding #2 of the program review report. Therefore, this finding may be considered closed. Findings requiring further action by RHSHS 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 RHSHS' response to the finding, and the Department's final determination for that finding. A copy of the program review report issued on August 23, 2012 is attached as Appendix B.

Finding #1. Institution Not Awarding Title IV Aid to Eligible Students

Citation Summary:

An institution must define the academic year for each program it offers. A program that measures progress in clock hours must have a minimum of 26 weeks of instructional time and 900 clock hours. 34 C.F.R. § 668.3(a). If the length of a clock hour program exceeds the defined length of the academic year, for the first academic year and any subsequent full academic year, the first payment period is the period of time in which the student successfully completes half of the number of clock hours and half of the number of weeks of instructional time. The second payment period is the period of time in which the student successfully completes the academic year. For any remaining portion of an eligible program that is not more than half an academic year, the payment period is the remainder of the program. 34 C.F.R. § 668.4(c)(2)(ii).

Noncompliance Summary:

RHSHS failed to fully award and disburse Title IV funds to eligible students enrolled in its Nursing and Radiologic Technology programs. RHSHS defined its academic year as 900 clock hours and 26 weeks. RHSHS's Nursing and Radiologic Technology program consist of 1000 and 1300 clock hours (respectively) offered over 38 weeks. RHSHS only awarded Title IV funds to students for the first 900 clock hours of these programs and failed to award funds for the remainder of the programs.

Required Action Summary:

The Department required RHSHS to conduct a full file review for 2009-2010 and 2010-2011 award years to calculate Federal Pell Grant funds that students would have been eligible to receive after completing 900 clock hours for each program.

RHSHS' Response:

The institution provided a written narrative to the Department as its response to the program review report. The written narrative explained the institution's actions leading up to the response to the program review report. In addition, RHSHS provided a written response for each finding contained in the program review report.

In the opening written narrative submitted by RHSHS the institution stated that finding #1 represented the self-disclosed issues identified by RHSHS and reported to the Department in April 2011. RHSHS stated that Title IV aid was incorrectly awarded to students during the 2009-2010 and 2010-2011 award years and that this was the result of an unintentional misinterpretation of the definition of an academic year for a clock hour program.

RHSHS stated that to achieve a resolution, the institution established a relationship with Financial Aid Services (FAS), a consulting firm for higher education. FAS audited every current student account to reconstruct each student's eligibility. After this work was complete, RHSHS directed FAS to self-disclose the results of the reconstruction to the Department. FAS notified the Department in April of 2011, via e-mail on behalf of RHSHS. The email sent by FAS included an Excel spreadsheet that was used during the reconstruction process. This spreadsheet included all current students for the 2009-2010 award year and the prior award years for these students where applicable. The spreadsheet contained student specific information, the analysis conducted and the conclusions reached by FAS as to each student's specific eligibility as a result of the reconstruction.

In RHSHS' program review response for finding #1, RHSHS defined its nursing program for the 2009-2010 award year as 1000 clock hours and 26 weeks of instructional time. For the 2010-2011 award year, RHSHS defined the Nursing program s 900 clock hours and 26 weeks of instructional time. The Radiologic Technology program consisted of 1300 clock hours and 26 weeks of instructional time for both the 2009-2010 and 2010-2011 award years. In addition, RHSHS stated that it incorrectly awarded the financial aid over a curricular academic year rather than a clock hour year as defined by federal regulations. RHSHS also stated that it misinterpreted the definition of full and part-time students adding to the miscalculation of financial aid awards.

RHSHS provided supplemental Excel spreadsheets dated May 9, 2013 to the Department. These spreadsheets included the reconstruction of student eligibility for all withdrawn and graduated students during the 2009-2010 and 2010-2011 awards years.

Final Determination:

The Department reviewed RHSHS' response dated May 9, 2013 and FAS' spreadsheet dated April 4, 2011 and the Department has based its final determination on the data presented therein.

The Department finds a total of 49 students were under awarded Federal Pell Grant funds during the 2009-2010 award year and a total of 4 students were under awarded Federal Pell Grant funds during the 2010-2011 award years. A list of these students is included as Appendix G.

Institutions that are clock hour based must award Title IV funds using the clock hour regulations established in 34 C.F.R. § 668.3. An institution's failure to follow these regulations puts the student, the Department, and the institution at risk due to Title IV funds being awarded improperly. In this instance, RHSHS under awarded Federal Pell Grant funds to multiple students during the 2009-2010 and 2010-2011 award years thus increasing the students' costs to attend RHSHS; however, these students have either withdrawn or graduated. The Department is closing this finding.

Finding # 3 Early Disbursement of Title IV Aid

Citation Summary:

For an institution that measures its programs in clock hours with an eligible program that is more than one academic year, the first payment period is the period of time in which the student successfully completes half of the number of clock hours and half of the number of weeks of instructional time in the academic year. The second payment period is the period of time in which the student successfully completes the academic year. 34 C.F.R. § 668.4(c)(2)(i)(A) and (B).

Noncompliance Summary:

RHSHS disbursed Title IV funds early based on a pre-established and arbitrary disbursement schedule that did not evaluate student progress based on the number of clock hours and the number of weeks completed by each student. A clock hour school has two requirements to disburse funds to a student. The first requirement is that the student complete the number of clock hours required for a specific payment period. The second requirement is that a student complete the required weeks of instructional time for a specific payment period. An institution may not disburse funds for a subsequent payment period to students until the students have completed the required number of hours and the required weeks of instructional time for the prior payment period.

Required Action Summary:

For the 2010-2011 award year, RHSHS took corrective action and revised its disbursement process.

RHSHS' Response:

RHSHS stated in its response that the institution took corrective action and revised its disbursement process to meet federal regulations prior to the on-site review.

Final Determination:

The Department reviewed RHSHS' response dated May 9, 2013 and FAS' spreadsheet dated April 4, 2011 and the Department has based its final determination on the data presented therein.

For the 2009-2010 award year, the Department has determined that RHSHS consistently awarded Title IV funds early resulting in ineligible disbursements because a number of students never completed the prior payment period, and thus failed to eventually earn the early disbursements for the subsequent payment period.

Based on the data from FAS and RSHS, there were 123 instances of early disbursements during the 2009-2010 award year. During the 2010-2011 award year there were 13 instances of early disbursements. The Department finds that during the 2009-2010 award year, there were 12 students who received early disbursements that were ineligible disbursements as listed on FAS' worksheet. As a result of these ineligible disbursements, a liability is owed to the Department. The total liability assessed for these 12 students is \$1,037.40. Appendix H lists the students and the Federal Direct loan disbursements.

D. Summary of Liabilities

Estimated Loss Summary

Type of Loan	Award Year	Loan Amounts	Estimated Loss Liability
Subsidized Direct Loans	2009-2010	\$8,746.07	\$1,037.40

Estimated Loss Formula (ELF):

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 actual 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 RSHS' most recent cohort default rate available.

The total amount of Direct Loan that RSHS improperly disbursed during the 2009-2010 award year for finding # 3 is \$8,746.07. The total estimated actual loss that RSHS must pay to the Department for the ineligible loans is \$1,037.40. Copies of the results of those calculations are included in Appendix E.

E. Payment Instructions

RSHS owes to the Department \$1,037.40. 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: \$1,037.40
DUNS: Institution's DUNS number
TTN: 9-digit tax identification number
Program Review Control Number: 201140327655

Terms of Payment

As a result of this final determination, the Department has created a receivable for this liability and payment must be received by the Department within 45 days of the date of this letter. If payment is not received within the 45-day period, interest will accrue in monthly increments from the date of this determination, on the amounts owed to the Department, at the current value of funds rate in effect as established by the Treasury Department, until the date of receipt of the payment. RHSHS is also responsible for repaying any interest that accrues. If you have any questions regarding interest accruals or payment credits, contact the Department's Accounts Receivable Group at (202) 245-8080 and ask to speak to RHSHS' account representative.

If full payment cannot be made within 45 days of the date of this letter, contact the Department's Accounts Receivable Group to apply for a payment plan. Interest charges and other conditions apply. Written request may be sent to:

U.S. Department of Education
OCFO Financial Management Operations
Accounts Receivable Group
550 12th Street, S.W., Room 6114
Washington, DC 20202-4461

If within 45 days of the date of this letter, RHSHS has neither made payment in accordance with these instructions nor entered into an arrangement to repay the liability under terms satisfactory to the Department, the Department intends to collect the amount due and payable by administrative offset against payments due from the Federal Government. RHSHS may object to the collection by offset only by challenging the existence or amount of the debt. To challenge the debt, RHSHS must timely appeal this determination under the procedures described in the "Appeal Procedures" section of the cover 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 at 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.

William D. Ford Federal Direct Loan (Direct Loan) Liabilities:

Direct Loan Estimated Loss

Finding(s): Finding #3: Early Disbursement of Title IV Funds
Appendix: H

DL Estimated Loss	
Amount	Award Year
\$1,037.40	2009-2010
Total	

RHSHS must pay the amount reflected above in Direct Loan estimated loss liabilities for the award year(s) reflected above. The liabilities will be applied to the general Direct Loan fund. This amount is also reflected in the total amount owed to the Department in Section I above.

F. Appendices

Appendices A, Student Sample, Appendix G, Student List of Under Awarded Federal Pell Grant Funds, and Appendix H, Student List of Ineligible Disbursements contain personally identifiable information and will be emailed to RHSHS as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file(s) will be sent in a separate email.

Appendices B, Program Review Report, Appendix C, Institution's Written Response, Appendix D, FAS Self Disclosure, Appendix E, Estimated Loss Calculation, and Appendix F, Estimated Loss Formulation Explanation are attached to this report.

Appendix A: Student Sample

Student #	Student Name	Social Security #
1	(b)(6); (b)(7)(C)	
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August 23, 2012

Clint Matthews
CEO/President
Reading Hospital School of Health Sciences
6th Avenue & Spruce Street
West Reading, PA 19611-1744

Certified Mail
Return Receipt Requested
7012 1010 0002 0472 0368

RE: **Program Review Report**
OPE ID: 00656500
PRCN: 201140327655

Dear Mr. Matthews:

From August 29, 2011 through September 2, 2012, Mr. Stephen Conger and Ms. Shein Dossa as representatives of the U.S. Department of Education conducted a review of Reading Hospital School of Health Sciences' (RHSHS) 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 RHSHS. The response should include a brief, written narrative for each finding that clearly states RHSHS' position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, RHSHS 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;

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, Philadelphia School Participation Division
The Wanamaker Building
100 Penn Square East Suite 511
Philadelphia, PA 19107
www.FederalStudentAid.ed.gov

- (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 response will not be attached to the FPRD. However, it will be retained and available for inspection by RHSHS 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 Mr. Stephen Conger 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. Appendix A and C, Program review Student Sample and Finding I student list contains PII. The appendices were encrypted and sent separately to the institution via e-mail. Please see the enclosure Protection of Personally Identifiable Information for instructions regarding submission to the Department of required data / documents containing PII.

Record Retention:

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

Reading Hospital School of Health Sciences
00656500
201140327655
Page 3 of 3

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 Mr. Stephen Conger at 215-656-5898 or Stephen.Conger@ed.gov.

Sincerely,

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

John S. Loreng
Compliance Manager

cc: Robin Hall, Financial Aid Administrator

Enclosure:
Protection of Personally Identifiable Information

Prepared for

**Reading Hospital School of
Health Sciences**



START HERE
GO FURTHER
FEDERAL STUDENT AID

OPE ID 00656500
PRCN 201140327655

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

Program Review Report
August 23, 2012

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A. Institutional Information

Reading Hospital School of Health Sciences
6th Avenue and Spruce Street
West Reading, PA 19611

Type: private non-profit

Highest Level of Offering: non-degree 3 Plus Years

Accrediting Agency: National League for Nursing Accrediting Commission

Current Student Enrollment: 410 students (2011-2012)

% of Students Receiving Title IV: 68% (2011-2012)

Title IV Participation 2010-2011:

Federal Pell Grant Program	\$516,673
William D. Ford Federal Direct Loan Program (DL)	\$1,832,196

Default Rate FFEL/DL: 2009 3.4%
 2008 2.9%
 2007 4.2%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Reading Hospital School of Health Sciences (RHSHS) from August 29, 2011 to September 1, 2011. The review was conducted by Mr. Stephen Conger and Ms. Shein Dossa.

The focus of the review was the academic year definition for a clock hour school. The review consisted of an examination of RHSHS's 2009-2010 and 2010-2011 award year students that received Title IV, HEA funds.

A sample of 30 files was identified for review from the 2009-2010 and 2010-2011 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 RHSHS'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 RHSHS 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 RHSHS to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding 1. Institution Not Awarding Title IV Aid to Eligible Students

Citation:

A student is eligible to receive Title IV, HEA program assistance if, among other things, the student is a regular student enrolled, or accepted for enrollment, in an eligible program at an eligible institution. 34 C.F.R. § 668.32(a)(1)(i).

In addition, a student is eligible to receive a Federal Pell Grant for the period of time required to complete his or her first undergraduate baccalaureate course of study. 34 C.F.R. § 690.6(a). An institution must disburse a Federal Pell Grant to an eligible student who is otherwise qualified to receive that disbursement. 34 C.F.R. § 690.61(a).

A student is eligible to receive a Direct Subsidized and/or a Direct Unsubsidized loan if the student is accepted and enrolled at an eligible institution at least half time in a school that participates in the Direct Loan Program. 34 C.F.R. § 685.200(a). A school may not originate a Direct Subsidized, Unsubsidized, or PLUS loan or a combination of loans for an amount that the school has reason to know would result in the borrower exceeding the annual or maximum loan amounts. In addition, a school may not originate a Direct Subsidized, Unsubsidized, or PLUS loan or a combination of loans that exceeds the student's estimated cost of attendance less the student's estimated financial assistance. 34 C.F.R. § 685.301(a)(4)(i)(ii).

In addition, a school participating in the Direct Loan Program shall ensure that any information it provides to the Secretary in connection with loan origination is complete and accurate. A school may refuse to originate a loan, or reduce the borrower's determination of need for the loan if the reason for that action is documented and provided to the borrower in writing. Also, the determination has to be made on a case-by-case basis and documentation for the decision must be contained within the student file. 34 C.F.R. § 685.301(a)(8)(i)(ii)(iii).

When awarding a Federal Direct Loan, the period of enrollment must coincide with one or more bona fide academic terms established by the school for which institutional charges are generally assessed. This includes weeks of instructional time and academic year definition. The period of enrollment is also referred to as the loan period. 34 C.F.R. § 685.102.

An institution must define the academic year for each program it offers. A program that measures progress in clock hours must have a minimum of 26 weeks of instructional time and 900 clock hours. 34 C.F.R. § 668.3(a). If the length of a clock hour program exceeds the defined length of the academic year, for the first academic year and any subsequent full academic year, the first payment period is the period of time in which the student successfully completes half of the number of clock hours and half of the number of weeks of instructional time. The second payment period is the period of time in which the student successfully completes the academic year. For any remaining portion of an eligible program that is not more than half an academic year, the payment period is the remainder of the program. 34 C.F.R. § 668.4(c)(2)(ii).

Noncompliance:

RHSHS failed to fully award and disburse Title IV funds to eligible students enrolled in its Nursing and Radiologic Technology programs. RHSHS defined its academic year as 900 clock hours and 26 weeks. RHSHS's Nursing and Radiologic Technology program consists of 1000/1300 clock hours (respectively) offered over 38 weeks. RHSHS only awarded Title IV funds to students for the first 900 clock hours of these programs and failed to award funds for the remainder of the program.

Of the thirty students contained within the Department's sample, twenty two students completed 900 clock hours and 26 weeks and two payment periods. As a result, these twenty two students were eligible for Title IV funds that were not calculated and/or awarded by RHSHS. Appendix C contains the list of students identified within this finding.

RHSHS's failure to award its eligible student's funds to which they were entitled deprived those students of the assistance the Title IV programs are intended to provide.

Required Action:

RHSHS is required to conduct a full file review for 2009-2010 and 2010-2011 award years to calculate Federal Pell Grant funds that students would have been eligible for after completing 900 clock hours for each program. RHSHS must submit the results of that file review in a spreadsheet, in the format specified in Appendix B. The spreadsheet should include the following information:

- Student Name;
- Payment Period (define the numbers of hours completed and weeks completed for each payment period);
- Program student is enrolled in;
- Expected Family Contribution;
- Current outstanding balance; and
- Calculated pro-rated amount for Federal Pell Grant

The institution must provide the spreadsheet in both hardcopy and electronic formats.

RHSHS is not required to provide individual student records at this time. However, once the review team has received the spreadsheet for this finding, the team may request additional documentation.

In situations where Federal Pell Grant eligibility and awarding conditions are met, the institution is required to notify the students of additional eligibility based on the results of the file review. This notification must be made clear to students and completed timely with the file review. RHSHS will be required to seek administrative relief from COD prior to making any adjustments to a student's Federal Pell Grant eligibility. Instructions are provided below:

1. Contact COD Customer Relations at 1 800 848-0978 or by e-mail to CODCustomerSupport@acs-inc to request extended processing and provide the reason for the request.
2. Make the adjustments prior to repayment of the liability.
3. Notify COD and Stephen Conger that they are finished making the adjustments.

Finding 2. Inaccurate Definition of a Title IV Disbursement/Inaccurate Reporting to the Common Origination and Disbursement (COD) System

Citation:

An institution makes a disbursement of Title IV, HEA program funds on the date that the institution credits a student's account at the institution or pays a student or parent directly with funds received from the Secretary of Education or institutional funds used in advance of receiving Title IV, HEA program funds. 34 C.F.R. § 668.164(a)(1).

A participating institution must report any change, condition, or event that causes a change in the amount of Federal Pell Grant funds for which the student qualifies. The institution must report these changes to the Secretary according to the schedule and deadline established in the Federal Register. 34 C.F.R. § 690.83(b)(1).

An institution must submit Federal Pell Grant disbursement records to the Common Origination and Disbursement system (COD) no later than 30 days after making a disbursement or becoming aware of the need to adjust a student's disbursement. The Federal Register published June 18, 2009 (Vol. 74, # 116) established that an institution must report disbursement records within 30 days of making a disbursement or becoming aware of the need for a change.

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 balance occurred if the credit balance occurred after the first day of class of a payment period. If the credit balance occurred from funds paid to a student account before the first day of class, then the credit balance is due no later than 14 days after the first day of class of that payment period. 34 C.F.R. §668.164(e)(1)(2).

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. Notwithstanding any authorization obtained by the institution under this paragraph, the institution must pay any remaining balance on loans 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 they were awarded. 34 C.F.R. §668.165 (b)(iii).

Noncompliance:

RHSHS operated using an inaccurate definition of a Title IV disbursement. RHSHS posted two entries to the student accounts for each Title IV disbursement. First, RHSHS posted an "expected" disbursement. The "expected" disbursement functioned as a credit to the student's account and reduced the balance due on the account. Subsequently, RHSHS posted the same aid to the account, a second time, and referred to this posting as an "actual" disbursement. An institution makes a Title IV disbursement on the date it credits funds to a student's account, regardless of whether those funds have already been received or are posted in anticipation of receipt from the Secretary. Thus, the "expected" disbursement credited to the student accounts constituted the actual Title IV disbursement for 22 of the 30 students sampled.

In addition, the inaccurate definition of a Title IV disbursement has resulted in inaccurate reporting to COD.

RHSHS's failure to recognize the Title IV disbursements at the time it credited those funds to the students' accounts and its inaccurate reporting of those disbursements to COD may result in inaccurate funding levels and cause increased expense for the Department. An institution's failure to recognize Title IV funds when disbursed may also result in the late payment of credit balances to students.

Required Action:

RHSHS must establish and define a Title IV disbursement policy and procedures. This policy must be based on a clock hour program with payment periods. A copy of these procedures must be provided with the institution's response to this finding.

Finding 3. Early Disbursement of Title IV Aid

Citation:

An institution must define the academic year for each program it offers. A program that measures progress in clock hours must have a minimum of 26 weeks of instructional time and 900 clock hours. 34 C.F.R. § 668.3(a). If a clock hour program is equal to two or more complete academic years, for the first academic year and for any subsequent academic year, the first payment period is the period of time in which the student successfully completes the first half of the year. The second payment period is the period of time in which the student successfully completes the second half of the year. If the academic year is defined as 900 clock hours, the first payment is the period of time needed for the student to successfully complete the first 450 clock hours. The second payment period is the period of time needed for the student to successfully complete the next 450 clock hours.

For an institution that measures its programs in clock hours with an eligible program that is more than one academic year, the first payment period is the period of time in which the student successfully completes half of the number of clock hours and half of the number of weeks of instructional time in the academic year. The second payment period is the period of time in which the student successfully completes the academic year. 34 C.F.R. § 668.4(c)(2)(i)(A)(B).

Noncompliance:

RHSHS created specific disbursement dates for the 2009-2010 award year. The dates established by RHSHS were August 31, 2009, January 1, 2010, and March 17, 2010.

A clock hour school has two requirements to disburse funds to a student. The first requirement is that the student complete the number of clock hours required for a specific payment period. The second requirement is that a student complete the required weeks of instructional time for a specific payment period. Until a student completes the clock hour requirement and weeks of instructional time, a student may not be disbursed funds for the next payment period. RHSHS did not evaluate the student's progress in terms of clock hours and weeks but simply disbursed funds on its pre-established and arbitrary disbursement dates.

Required Action:

For the 2010-2011 award year, RHSHS took corrective action and revised the disbursement process. RHSHS' corrective action was initiated prior to the Department's on-site review. The institution modified their disbursement policy to disburse funds within a student's specific payment period. The student sampled reviewed for the 2010-2011 award year supported RHSHS' corrective action.

RHSHS must follow the Federal regulations that define a payment period for a clock hour school and apply those regulations correctly. Any change in the institution's policies or procedures regarding this finding must be must accompany the response to the program review report.

D. Appendices

Appendix A contains the student sample information.
Appendix B contains the format for the file review for Finding 1.
Appendix C contains the list of students for Finding 1

The Reading Hospital

School of Health Sciences



October 21, 2012

RE: Program Review Report
OPE ID: 00656500
PRCN: 201140327655

Dear Mr. Conger,

Enclosed is the response of The Reading Hospital School of Health Sciences (TRHSHS) in response to the August 23rd preliminary program review report from the United States Department of Education.

In the beginning of the 2010 academic year, TRHSHS recognized that the office of financial aid had incorrectly interpreted the awarding process for some students in 2009-2010 and 2010-2011 academic years. The issues of non-compliance were rooted in an unintentional misinterpretation of the definition of an academic year for a clock hour program.

Immediately upon recognition of the error, TRHSHS established an action plan for resolving the identified issues. At that time the following six goals were established and documented.

1. Investigate and identify the scope of the problem by auditing all student accounts receiving federal financial aid (Stafford Loans and Pell awards) in 2009-2010 and 2010-2011 academic years.
2. Following the identification of the scope of the problem, notify the Department of Education of the issues, scope of the problem, and plans for maintaining compliance.
3. Achieve compliance with federal regulations for all accounts
 - a. Re-establish academic calendar and clock hour calculations for all accounts.
 - b. Return funds as needed.
 - c. Bring all student accounts into compliance.
 - d. Establish processes for compliance with federal financial aid awards for fall 2010 and onward.

4. Bill all current students for fall 2010 in accordance with current federal and state regulations only after resolving account issues.
5. Investigate potential sources of internal financial support (i.e. Scheetz, Internal Scholarships) for students who were incorrectly awarded federal funds in past two years and whose 2010-2011 billing cycle has been impacted by adjustments in the compliance process.
6. Assess all financial aid and school processes and policies to insure compliance with Federal Regulations.

In order to achieve the goals, TRHSHS established a relationship with a consulting firm specializing in financial aid (Financial Aid Services). TRHSHS also hired additional FTE consultants to assist with the audit and re-awarding process. TRHSHS worked closely with the consultants who audited every current student account, re-established academic year start and end dates according to correct clock hour calculations, and brought each current student account into compliance. During this period of time, for almost an entire academic year, students were permitted to attend classes without making any tuition payments until their accounts were corrected, and an accurate billing process reflecting correct financial aid awards, could be established for each account. In addition, students who were negatively impacted by the re-awarding process were provided internal scholarship awards, thus preventing students from bearing any consequence of the errors of the financial aid department.

Following the thorough internal investigation of each current student record, and recalculation of each individual's academic year, the school was prepared to provide the Department of Education with a comprehensive self-disclosure report of the problem. TRHSHS provided that self-disclosure in April 2011 assisted by the consultant who (as requested by the school) made the initial contact with the Department of Education staff. The school maintains a high standard of ethical responsibility, and thus it is important to the school that this notation of self-disclosure is recorded and clearly documented in the report.

The school's responses to the findings are as follows:

Finding 1:

This finding represents the initial issues self-disclosed by the School to the Department of Education. TRHSHS agrees that financial aid was incorrectly awarded to some students in the 2009-2010 and 2010-2011 academic years. The issues of non-compliance were rooted in an unintentional misinterpretation of the definition of an academic year for a clock hour program.

The nursing program initially used an academic year definition of 1000 clock hours and 26 weeks (2009-2010) which later changed to 900 clock hours and 26 weeks (2010-2011 academic year and onward). The RT program awarded financial aid based on 1300 clock hours and 26 weeks per academic year. TRHSHS incorrectly awarded the financial aid over a curricular academic year

(August through July) rather than a clock hour year as defined by the regulations. In addition the definition of full-time and part-time student was misinterpreted adding to the miscalculation of financial aid awards.

TRSHS Action (prior to Program Review Report) - The voluntary action taken by the school was a full scale investigation of every current student file. This was a tedious process, completed in consultation with Financial Aid Services who was contracted to provide this service. Each current student's academic calendar was re-created, and each account was subsequently re-awarded correctly. The complete spreadsheet of the findings was sent to the Department of Education at the time of self-disclosure. As previously stated, the students were not required to pay tuition until their individual account was corrected. Internal scholarship funds were provided to each student whose new (correct) financial aid awards were decreased from the original award letters sent to the students earlier in the year (thus avoiding any negative impact for the student).

In addition, in accordance with the Department of Education Program Review report, Robin Hall, the Current Director of Financial Aid and Budget, completed a full file review to calculate Federal Pell Grant funds. The results of this file have been sent via e-mail to you, and will also be sent by hard copy as requested.

The school is prepared to review this file with you.

Finding 2:

This finding was made known to the school with the receipt of the Program Review Report in August 2012. Thus, the school (not aware of this issue) did not take any action prior to receipt of the Program Review Report.

The school believes that this finding is not accurate. The school now recognizes that the documents provided to the Department of Education during the compliance review provided only the student's expected balance account, and did not reflect the entire accounting process. You should have been reviewing both the ledgers of the current account and the expected account. The school apologizes for not recognizing that omission during the compliance audit.

The electronic student account system (Gradpro) provides two separate accounting processes. The "current balance" is the official student account record and complies with the requirements of Title IV HEA program funds. The school credits the student account only after receiving the Title IV funds. The current balance ledger is the "real time" and official student account. Credit balances are also paid according to federal Title IV regulations from this account.

A second accounting balance is provided to the student called "expected". This process is a benefit to the student who (at any time) can view the amount of out-of-

--pocket expenses that they are responsible to pay. Students have requested and indicated that this is of significant benefit to them in budgeting and meeting their financial responsibilities. The "expected" balance is not the official student account, and is clearly communicated to students as such. It was this report which was provided to you during the compliance audit, and is referred to in finding #2 of the PRP.

Enclosed is the complete record for each of the students identified in your initial review. The document clearly demonstrates that the funds for the official student balance are applied according to regulations.

Credit balances are paid to students in accordance with federal regulations only after receiving the funds and crediting the official student account balance.

TRHSHS believes that the current accounting processes and subsequent credit balances meet the federal regulations.

Finding 3:

As defined in the program review report, TRHSHS took corrective action and revised the disbursement process to meet federal regulations prior to the on-site review. The school is confident that current disbursement processes meet federal Title IV regulations.

Thank you for your assistance in this process. Please feel free to contact Robin Hall, Director of Financial Aid and Budget (hallr@readinghospital.org) or Debbie Rahn, Director of TRHSHS (rahnde@readinghospital.org) with questions related to this report.

Sincerely,

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

Debbie J. Rahn Ed.D.(c), MSN, RN, FABC
Director



Financial Aid Services
New Brunswick College of Education

CELEBRATING
YEARS
Serving Higher Education

Reading Hospital School of Health Sciences

Academic Year Reconstruction Methodology for the Nursing Program

Reading Hospital School of Health Sciences asked Financial Aid Services (FAS) to reconstruct the academic years for returning students in the Nursing Program. The Nursing Program is a 2397.5 clock hour program. Students may enroll in the "Day" or the "Evening/Weekend Programs". Also, students may transfer from one to the other program. The length of the Day Program takes approximately 2 years to complete. The Evening/Weekend Program is approximately 3 years in length.

It was discovered that the former Financial Aid Director was awarding the students in standard academic years instead of clock hours. When discovered, the administration wanted to make certain that this error did not carry forward to the current academic year, hence FAS was asked to determine the correct start date for the students' next Academic Years with the beginning clock hour and weeks which required reconstruction of the students' academic years and their financial aid awards.

Below is the methodology used to reconstruct the Academic Years for each student. All academic years prior to August 30th, 2010 were 1000 clock hours and 26 weeks. The academic year beginning August 30th, 2010 is 900 clock hours and 26 weeks. Also, prior to August 30th, 2010, the successful completion of weeks and clock hours were not tracked during the periods of enrollment. Any student that had fewer clock hours or weeks other than listed above was prorated for their remaining award(s).

The list of students was provided by the school. The following documents were provided to FAS.

- Previous year's award letters,
- Unofficial student transcript
- Individual student spreadsheet listing the courses week start date, attempted and earned clock hours for each week, the week the type and the amount of financial aid disbursed and the number of clock hours attended for each course
- Transaction ledger for each student
- A copy of the 2010 – 11 ISIR

The student's financial aid file was not provided therefore, FAS did not review the common student eligibility requirements such as verification, SAR C Code database matches, over awards or eligibility for state grants.

In addition, FAS reviewed NSLDS data as well as Pell payment data on COD.

1. For each student, a calendar was constructed using the data provided by the school. (See appendix A) The courses were pre-populated and the reviewer noted which courses were transferred into the Nursing program. Each course successfully completed was circled and clock hours and # of weeks was calculated to identify the beginning and end dates of the academic year(s) the clock hour/week progression and the dates of the first and second payment period for each academic year. Also reviewed were the number of clock hours the student attended each week to determine less than ½ time status for loan periods and disbursements.
2. After constructing the calendar, a worksheet was completed for each student (See appendix B) The following data was calculated and tracked on the worksheet:
 - The number of transfer credits
 - Credit hour to clock hour conversion.
 - Adjusted program length
 - Whether the student failed or withdrew from a course
 - The original start and end dates of the Academic Year(s)
 - The adjusted AY end date, if appropriate
 - Loan period dates
 - Disbursement dates (actual and calculated) and the number of days too late or too early. (A negative number indicates that the aid could have been disbursed earlier. A positive number indicates the number of days the aid was disbursed too early.)
 - The amount of federal aid disbursed
 - The dates federal financial aid were disbursed
 - If it appeared as though a Return to Title IV calculation should have been performed and
 - Comment field for the reviewer.
3. As the worksheets were completed, the information was entered into a spreadsheet, based on award years. A liability column is added to each program (Pell, Subsidized, Unsubsidized and PLUS loans). The liability tab includes only those amounts for which the student received more than the financial aid they should have received for an academic year due to the certification of too many loans or not prorating the financial aid for the remaining enrollment period. Any tentative liability (special allowances (SA) and/or loan interest) due to early disbursements is not calculated.
 The 1st tab of the spreadsheet is students awarded using the 2009 – 10 FAFSA. The 2nd tab, 2008-09, the 3rd tab, 2007-08 and the 4th tab, 2006-07. The last tab is the tentative liability total by award year.
 Students, highlighted in purple, are included on more than one tab. Students, highlighted in green did not receive federal financial aid.

Conger, Stephen

From: Gifford, Nancy Paula
Sent: Wednesday, February 26, 2014 3:08 PM
To: Conger, Stephen
Subject: FW: RHSHS
Attachments: RHSHS Reconstruction Methodology.docx; Appendix B.xlsx; Appendix A.xlsx; Appendix A1 Evening Weekend Program.xlsx

From: Gifford, Nancy Paula
Sent: Wednesday, April 27, 2011 8:21 AM
To: Gifford, Nancy Paula
Subject: FW: RHSHS

From: Kathy Hill [<mailto:Kathy@financialaidservices.org>]
Sent: Wednesday, April 27, 2011 8:03 AM
To: Gifford, Nancy Paula
Subject: RHSHS

Nancy,

I'm attaching a several items that, I hope, will help you to understand why we were working with RHSHS. The school discovered a few students that were not originally forwarded to us and we have one more student to put on "the spreadsheet". As soon as it's complete, I'll forward that to you as well.

Kathryn L. Hill
Vice President of Interim Staffing
Financial Aid Services
770/988-9447 Ext. 113
FAX 770/955-4119

From: Gifford, Nancy Paula [<mailto:Nancy.Paula.Gifford@ed.gov>]
Sent: Tuesday, April 26, 2011 3:14 PM
To: Kathy Hill
Subject: RE: this is another test!!

Got it. Can we talk early tomorrow morning?

From: Kathy Hill [<mailto:Kathy@financialaidservices.org>]
Sent: Tuesday, April 26, 2011 3:13 PM
To: Gifford, Nancy Paula
Subject: this is another test!!

Kathryn L. Hill
Vice President of Interim Staffing
770-988-9447 ext 113



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The information in this e-mail and any attachment, is confidential and for use by the addressee only. If you are not the intended recipient, please return the e-mail to the sender and delete it from your computer.

Estimated Loss Formula

9/16/2013

Enter Institution Name Reading Hospital School of Health Sciences

Select Institution Type Private Non Profit 2 Yrs or Less

Select Type of Loan	Select Award Year	Enter Ineligible Loan Amount	Enter		Estimated Loss Liability
			School CDR	Total Subsidy Costs	
1 DL Subsidized	2010-2011		1.10%		
2 DL Unsubsidized	2010-2011		1.10%		
3		\$ -			\$ -
Description					
4 DL Subsidized	2009-2010	\$ 8,746.07	2.50%	11.86%	\$ 1,037.40
5 DL Unsubsidized	2009-2010	\$ 12,532.39	2.50%	-26.98%	\$ -
6		\$ 21,278.46			\$ 1,037.40
Description					
7					
8					
9		\$ -			\$ -
Description					
10					
11					
12		\$ -			\$ -
Description					

Original Ineligible Loan Liability \$ 21,278.46 Total Estimated Loss \$ 1,037.40

Appendix F: Estimated Loss Formula Explanation

The Estimated Actual Loss Formula (EALF) is used for only certain types of findings on ineligible FFEL and Direct Loan liabilities. The EALF estimates (1) the principal amount that has or will default; and (2) the interest and special allowance on the entire ineligible loan amount.

The EALF uses an institution’s applicable cohort default rate (CDR) to estimate the amount of defaults from the ineligible principal amount. This is usually the institution’s latest published CDR. Draft CDRs are not used unless there is no prior CDR.

Example: Ineligible Principal Loan Amount \$100,000
 Cohort Default Rate 10.0%
 Estimated Default Amount Due \$10,000

The EALF calculates interest and special allowance (SA), where applicable, on the entire amount of ineligible loan principal. The number of days used to calculate interest and special allowance is based on average historical data for various time periods for different types of schools.

Period	School Type	One-Year	Two-Year	Four-Year	Rate Types
Disbursement to Repayment		584	774	969	Interest & SA
Repayment to Default		418	498	619	SA
Repayment to Paid In Full		1659	1580	1712	SA

The EALF uses the actual interest rates in effect when the ineligible loans were disbursed and an annualized average of the quarterly special allowance rates in effect. The EALF divides the number of days in each time period so that changes in interest and special allowance rates are considered. The EALF also assumes that the ineligible loans were made in two disbursements after a 30-day delay.

Example for the Disbursement to Repayment Period for a Two-Year Institution (2004-05)

Variable Rate Ineligible Loans: \$40,000 subsidized and \$60,000 unsubsidized
 Interest Rates: 04-05 (2.77), 05-06 (4.70), 06-07 (6.54)
 SA Rates: 04-05 (1.45), 05-06 (1.55), 06-07 (0.53)

Subsidized Loan Amount (Interest and Special Allowance)
 $\$40,000/2 \times (451 \times (.0422/365))$
 $+ \$40,000/2 \times (730 \times (.0625/365))$
 $+ \$40,000/2 \times (367 \times (.0707/365)) = \$4,964.61$

Unsubsidized Loan Amount (Special Allowance Only)

$$\begin{aligned} & \$60,000/2 \times (451 \times (.0145/365)) \\ & + \$60,000/2 \times (730 \times (.0155/365)) \\ & + \$60,000/2 \times (367 \times (.0053/365)) = \$1,627.36 \end{aligned}$$

NOTE: The number of days of 774 for this time period is doubled to 1548 (451+730+367) because the principal amount is divided by two.

Similar calculations are made for the other two periods. The total liability is the sum of the default amount with the interest and special allowance calculations for all three periods.

Appendix G: Student List of Under Awarded Federal Pell Grant Funds

Student ID	Name	Pell Amount Under Awarded	Award Year
(b)(6); (b)(7)(C)		\$100	0910
		\$2,675	0910
		\$100	0910
		\$1,700	0910
		\$24	0910
		\$1,337	0910
		\$1,950	0910
		\$2,661	0910
		\$906	0910
		\$2,150	0910
		\$100	0910
		\$950	0910
		\$100	0910
		\$2,675	0910
		\$2,675	0910
		\$896	0910
		\$100	0910
		\$2,675	0910
		\$1,338	0910
		\$2,675	0910
		\$1,191	0910
		\$100	0910
		\$2,675	0910
		\$1,699	0910
		\$1,078	0910
		\$2,050	0910
		\$896	0910
		\$263	0910
		\$2,400	0910
		\$1,100	0910
		\$1,404	0910
		\$1,311	0910
		\$1,100	0910
		\$50	0910
		\$2,500	0910
		\$2,675	0910
		\$2,100	0910
		\$675	0910
		\$2,400	0910
		\$1,699	0910
\$551	0910		
\$2,675	0910		
\$295	0910		
\$407	0910		
\$875	0910		

Appendix G: Student List of Under Awarded Federal Pell Grant Funds (cont)

Student ID	Name	Pell Amount Under Awarded	Award Year
(b)(6); (b)(7)(C)		\$1,609	1011
		\$2,775	1011
		\$747	1011
		\$635	1011

Appendix H: Student List of Ineligible Early Disbursements

Student ID	Name	Program	Amount	Award Year
(b)(6); (b)(7)(C)		DLS	\$492.50	0910
		DLS	\$55.91	0910
		DLU	\$91.84	0910
		DLS	\$1,723.75	0910
		DLU	\$2,955.00	0910
		DLS	\$88.65	0910
		DLS	\$2,216.25	0910
		DLU	\$2,955.00	0910
		DLS	\$88.65	0910
		DLS	\$59.10	0910
		DLU	\$88.65	0910
		DLS	\$1,723.75	0910
		DLU	\$2,955.00	0910
		DLS	\$2,327.06	0910
		DLU	\$3,102.75	0910
		DLU	\$147.75	0910
		DLS	\$59.10	0910
		DLU	\$88.65	0910
		DLU	\$147.75	0910