



September 30, 2014

Robert Lapierre  
President  
Rob Roy Academy  
260 South Main Street  
Fall River, MA 02721

UPS #: 1ZA879640292469127

RE: **Expedited Final Program Review Determination Letter**  
OPE ID: **01294800**  
PRCN: **201440128758**

Dear Mr. Lapierre:

From August 25, 2014 through August 26, 2014, Cheryl Marotta and James McDonagh conducted a review of Rob Roy Academy's (RRA) 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.

Based upon an analysis of the Department's data, the Department determined that RRA had a significant number of withdrawn, R2T4 and verification occurrences.

A sample of 18 files was identified for review from the 2013/2014 award year.

Appendix A lists the names and partial social security numbers of the students whose files were examined 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. Appendix A was encrypted and sent separately to the institution via e-mail.

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

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

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The School Participation Division-New York/Boston has made a Final Program Review Determination concerning the finding that was identified during the program review. Following is a discussion of the finding identified and the resolution of that finding.

**Program Findings and Final Program Review Determination:**

**Finding 1: Credit Balance Deficiencies**

**Citation:** Federal regulations at 34 C.F.R. § 668.164(e) state that 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; or no later than 14 days after the first day of class of a payment period if the credit balance occurred on or before the first day of class of that payment period.

Federal regulations at 34 C.F.R. § 668.165(b) state that if an institution obtains written authorization from a student or parent, as applicable, the institution may use the student's or parent's Title IV, HEA program funds to pay for charges described in § 668.164(d)(2) that are included in that authorization; and may also 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 under § 668.164(e).

**Noncompliance:** Students 5 and 8 were identified during the review as having credit balances returned on the 15<sup>th</sup> day after the credit balance occurred. The student files did not contain a written authorization to hold the funds.

**Institutional Action Taken to Resolve Noncompliance:** The institution concurred with the finding and has put in place a process to ensure all credit balances are paid within 14 days.

**Final Program Review Determination:** RRA has taken the corrective actions necessary to resolve this finding. Therefore, RRA may consider this finding closed.

**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 Cheryl Marotta at 617-289-0131.

Rob Roy Academy  
OPEID: 01294800  
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Sincerely,

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Betty Coughlin  
Division Director

cc: Diane Andre, Director of Financial Aid  
MA Division of Professional Licensure  
National Accrediting Commission of Career Arts and Sciences