



July 3, 2014

Dr. Larry Rice
President
Rogers State University
1701 West Will Rogers Boulevard
Claremore, OK, 74017-3252

Certified Mail
Return Receipt Requested
7011 2000 0000 8054 3687

RE: Expedited Final Program Review Determination Letter
OPE ID: 00316800
PRCN: 201430628629

Dear Dr. Rice:

From June 2, 2014 through June 5, 2014, Michelle Allred and Dalinda Lasater conducted a review of Rogers State University's (RSU) 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 RSU's compliance with the statutes and federal regulations as they pertain to the institution's administration of the Title IV programs. The review consisted of, but was not limited to, an examination of RSU'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 each 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 RSU's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures.

Federal Student Aid

An OFFICE of the U.S. DEPARTMENT of EDUCATION
Dallas School Participation Division

1999 Bryan St. Suite 1410, Dallas, TX 75201-6817

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Furthermore, it does not relieve RSU of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

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: Pell Underpayment

Citation: 34 C.F.R. § 690.62(a) states that the amount of a student's Pell Grant for an academic year is based upon the payment and disbursement schedules published by the Secretary for each award year.

Noncompliance: The institution did not award Pell in the proper amounts for student #12. An instructor reported the student as "Did Not Attend" at census. The student did not contest the class status when notified. At census the Pell award was paid at three quarter time due to the "Did Not Begin Attendance" designation of the instructor. However at the time grades were reported, the student received grades in courses totaling full time enrollment. The adjustment of the Pell award at census to three quarter time resulted in an underaward of \$500.00 due to the fact that the student was confirmed to have attended full time hours at the time that grades were reported.

Institutional Action Taken to Resolve Noncompliance: RSU awarded the student the additional Pell Grant amount while the review team was on site. In addition, the institution developed a procedure to identify students who receive a grade in a course that was previously reported as "Did Not Begin Attendance".

Final Program Review Determination: RSU has taken the corrective actions necessary to resolve this finding. Therefore, RSU may consider this finding closed, with no further action required.

Finding 2: Borrower Not Notified Timely Of Right To Cancel All Or Part Of Loan Or Loan Disbursement

Citation: The Cash Management regulations set forth at 34 C.F.R. § 668.165(a) provide:

- If an institution credits a student's account at the institution with Direct Loan, FFEL, or Federal Perkins Loan Program funds and receives such funds via Electronic Funds Transfer (EFT), the institution must notify the student, or parent, of –
 - The date and amount of the disbursement;
 - The student's right, or parent's right, to cancel all or a portion of that loan or loan disbursement and have the loan proceeds returned to the holder of that loan. However, the institution does not have to provide this information with regard to FFEL Program funds unless the institution received the loan funds from a lender through an EFT payment or master check; and

- The procedures and the time by which the student or parent must notify the institution that he or she wishes to cancel the loan or loan disbursement.
- The institution must send the notice described above –
 - No earlier than 30 days before and no later than 30 days after crediting the student's account at the institution; and
 - Either in writing or electronically.

Per 34 C.F.R. § 668.165(a)(4) and (5), any cancellation requested by a student (or parent in the case of a PLUS loan) within 14 days of the date the institution sends such a notice, must immediately be made by the institution. If a student or parent requests a cancellation after this 14-day period, the institution may return the proceeds and cancel the loan, but is not required to do so. In any event, the institution is required to inform the student or parent of the outcome of the cancellation request.

Noncompliance: RSU did not provide a timely notice to students of the right to cancel the loan. RSU was under impression that the language in the award letter provided by the school and the notification provided by Direct Loan Servicing was enough to provide for the cash management regulation regarding timely notification of the right to cancel all or part of a loan or loan disbursement.

Institutional Action Taken to Resolve Noncompliance: RSU created a policy and procedure document detailing the procedures the school is implementing in order to comply with the regulation. RSU also provided the reviewers with a copy of the notice that will henceforth be delivered to students in order to provide timely notice of the right to cancel all or part of a loan or loan disbursement. These items were provided to the reviewers while still on site.

Final Program Review Determination: RSU has taken the corrective actions necessary to resolve this finding. Therefore, RSU may consider this finding closed, with no further action required.

Finding 3: Records Not Maintained

Citation: According to 34 C.F.R. § 668.24(d) and (e), An institution shall establish and maintain, on a current basis, any application for Title IV, HEA program funds and program records that document its eligibility. Its records should be made readily available for review by the Secretary or the Secretary's authorized representative at an institutional location designated by the Secretary or authorized representative.

The Fiscal Operations Report and Application to Participate (FISAP) in the Federal Perkins Loan, Federal Supplementary Educational Opportunity Grant (FSEOG), and Federal Work Study (FWS) Programs, and any records necessary to support the data contained in the FISAP, including income grid information, must be retained for three years after the end of the award year in which the FISAP is submitted.

Job descriptions for all FWS positions should be a part of the control procedures included in a school's policies and procedures manual. A written job description will help the institution

ensure that the position is one that qualifies under the FWS program regulations. For additional guidance specifically relating to the requirements for FWS job descriptions, please refer to the *2013-2014 Federal Student Aid Handbook*, Volume 6, pp. 6-44 to 6-45.

Noncompliance: RSU was unable to provide written job descriptions for Federal Work Study positions.

Institutional Action Taken to Resolve Noncompliance: RSU provided written Federal Work Study job descriptions for all positions shortly after the end of the program review.

Final Program Review Determination: RSU has taken the corrective actions necessary to resolve this finding. Therefore, RSU 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 contact Michelle Allred at 214-661-9466.

Sincerely,

(b)(6)

Cynthia Thornton, Director
Dallas School Participation Division

cc: Kelly Hicks, Financial Aid Administrator
North Central Association of Colleges and Schools - CIHE (Higher Education)
Oklahoma State Regents for Higher Education

Rogers State University

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Appendix A: Student Sample

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Dr. Larry Rice, President
 Rogers State University
 1701 West Will Rogers Blvd
 Claremore, OK 74017-3252

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