



April 29, 2015

Donald Steinberg
President
SIT

1 Kipling Road
Brattleboro, Vermont 05302-4801

UPS Tracking #:
1Z A87 964 02 9360 6628

RE: Final Program Review Determination
OPE ID: 00886000
PRCN: 2014-201-28539

Dear Mr. Steinberg:

The U.S. Department of Education's (Department's) School Participation Division – New York/Boston issued a program review report on September 9, 2014 covering SIT's administration of 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), for the 2012-2013 and 2013-2014 award years. The institution's final response was received on November 5, 2014.

The School Participation Division – New York/Boston has reviewed SIT's response(s) to the Program Review Report. A copy of the program review report (and related attachments) and SIT's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by SIT 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.

SIT's response has resolved all findings. In addition, SIT has provided assurances that the appropriate corrective actions have been taken to resolve and prevent future occurrences of all findings. Therefore, SIT may consider the program review closed with no further action required.

Program records relating to the period covered by this program review must be retained until the later of: the resolution of the loan(s), claim(s) or expenditure(s) questioned in the program review [34 C.F.R. § 668.24(e)(3)(i)] or the end of the retention period applicable to the record [34 C.F.R. § 668.24(e)(1) and (e)(2)].

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

New York/Boston School Participation Division
5 Post Office Square, 9th Floor, suite 950-A, Boston, MA 02109-3921
StudentAid.gov

If you have any questions please call Mr. Edward Buckley at 617-289-0132.

Sincerely,

(b)(6)

Betty Coughlin
Division Director

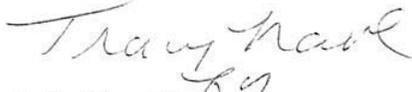
Enclosure: Appendix A - Student Sample
Program Review Report (with attachments)
SIT's Response to the Program Review Report

cc: Ms. Cathy Mullins, Director of Financial Aid
New England Association of Schools and Colleges - CHE
Vermont Department of Education
Department of Defense
Department of Veterans Affairs
Consumer Financial Protection Bureau

SIT
OPE ID Number: 008860
PRCN Number: 2014-201-28539
Page 2 of 2

If you have any questions please call Mr. Edward Buckley at 617-289-0132.

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Division Director

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SIT's Response to the Program Review Report

cc: Ms. Cathy Mullins, Director of Financial Aid
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Vermont Department of Education
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Department of Veterans Affairs
Consumer Financial Protection Bureau



September 9, 2014

Donald Steinberg
President
SIT
1 Kipling Road
Brattleboro, Vermont 05302-4801

UPS Tracking #:
1Z A87 964 9279 9806

RE: **Program Review Report**
OPE ID: 00886000
PRCN: 2014-201-28539

Dear Mr. Steinberg:

From February 24, 2014 through February 28, 2014, Edward Buckley & James McDonagh conducted a review of SIT'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 SIT. The response should include a brief, written narrative for each finding that clearly states SIT's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, SIT 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 response will not be attached to the FPRD. However, it will be retained and available for

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).

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New York/Boston School Participation Division

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 Edward Buckley of this office within 30 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. The appendix was 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).

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 Edward Buckley at 617-289-0132 or edward.buckley@ed.gov.

Sincerely,

(b)(6)

Tracy M. Nave
Compliance Manager

cc: Ms. Cathy Mullins, Director of Financial Aid

Enclosure:
Program Review Report (and appendices)
Protection of Personally Identifiable Information

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
SIT

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

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the AMERICAN MIND™

OPE ID: 00886000
PRCN: 2014-201-28539

Prepared by
U.S. Department of Education
Federal Student Aid
School Participation Division- New York/Boston

Program Review Report

September 9, 2014

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B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at SIT from February 24, 2014 to February 28, 2014. The review was conducted by Edward Buckley and James McDonough.

The focus of the review was to determine SIT'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 SIT'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 15 files was identified for review from the 2012-2013 and 2013-2014 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.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning SIT'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 SIT 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 SIT to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding 1. Conflicting Information

Citation: *34 C.F.R. §668.16(f)* states that in order to be deemed administratively capable an institution must develop and apply an adequate system to identify and resolve discrepancies in the information that the institution receives from different sources with respect to a student's application for financial aid under Title IV, HEA programs. In determining whether the institution's system is adequate, the Secretary considers whether the institution obtains and reviews—

- (1) All student aid applications, need analysis documents, Statements of Educational Purpose, Statements of Registration Status, and eligibility notification documents presented by or on behalf of each applicant;
- (2) Any documents, including any copies of State and Federal income tax returns, that are normally collected by the institution to verify information received from the student or other sources; and
- (3) Any other information normally available to the institution regarding a student's citizenship, previous educational experience, documentation of the student's social security number, or other factors relating to the student's eligibility for funds under the Title IV, HEA programs.

Noncompliance: The student's file contained conflicting income information. The file contained an Institutional Student Information Record (ISIR) dated April 23, 2013 in which the student reported that his income earned from work was \$32,000 and his spouse's income earned from work was \$47,000. The field on the ISIR pertaining to the type of tax return filed reported "will not file". Because the income surpassed the level of a non-tax filer, the first ISIR did not result in an EFC. In a subsequent ISIR dated June 27, 2013, the student reported his tax filing status as "will file, not completed". On this ISIR the student's income earned from work was \$32,000 and his spouse's income earned from work was reported as zero. This ISIR resulted in an EFC of \$6,651. Student 15 received \$32,570 in Title IV funds during the 2013/2014 award year. This funding consisted of \$1,600 in Federal Perkin Loan funds, \$20,500 in Federal Direct Unsubsidized Stafford Loan funds and \$10,470 in Graduate PLUS loan funds.

Required Action:

Subsequent to the completion of the onsite portion of the review, the institution sent the lead reviewer an updated ISIR dated May 6, 2014. On this ISIR, the student reported his tax filing status as already completed and identified it as a foreign tax return. The student's income was reported as \$32,000 and the spouse's income was reported as \$47,000. The AGI was reported as \$32,000. This ISIR resulted in an EFC of \$2,903.

In response to this report, the institution must include back up documentation that they used to verify the most recent information reported on the ISIR. This may include a copy of the foreign tax return. In addition, the institution must include procedures that will ensure that all conflicting information is resolved in the future.

Finding 2. Missing Federal Work Study Documents

Citation: 34 C.F.R. §675.20(c) states that regardless of the student's employer, the student's work must be governed by employment conditions, including pay, that are appropriate and reasonable in terms of—

- (i) Type of work;
 - (ii) Geographical region;
 - (iii) Employee proficiency; and
 - (iv) Any applicable Federal, State, or local law.
- (2) FWS employment may not—
- (i) Impair existing service contracts;
 - (ii) Displace employees;
 - (iii) Fill jobs that are vacant because the employer's regular employees are on strike;
 - (iv) Involve the construction, operation, or maintenance of any part of a facility used or to be used for religious worship or sectarian instruction; or
 - (v) Include employment for the U.S. Department of Education.

The 2013-2014 Federal Student Aid Handbook, Volume 6, Page 6-44 further stipulates that job descriptions for all FWS positions should be a part of the control procedures included in your school's policies and procedures manual. A written job description will help ensure that the position is one that qualifies under the FWS program regulations. In addition, a written job description provides students with the information they need to determine whether they qualify for the job, whether the job is related to their educational or career objectives, and whether the job is of interest to them. Moreover, by considering the rates of pay applicable to the position, the qualifications for each pay level, and the qualifications of a student applicant, a financial aid administrator can determine the hours a student will need to work in order to earn the funds specified in the student's FWS award. Finally, a written job description establishes a record to which all parties can refer. In addition, a written job description can help avoid disagreements and adjudication and provide a reference in such cases.

Noncompliance:

During the onsite portion of the review, reviewers requested the Federal Work Study (FWS) job descriptions for students 11, 15, 18 and 24. The institution was unable to provide the job descriptions at that time.

Required Action:

Subsequent to the completion of the onsite portion of the review, the institution provided the lead reviewer with copies of the missing job descriptions. In response to this report, the institution must provide procedures that will ensure that job descriptions are always readily available.

Finding 3. Missing Exit Interviews

Citation: *34 C.F.R. §685.304(b)* stipulates that a school must ensure that exit counseling is conducted with each Direct Subsidized Loan or Direct Unsubsidized Loan borrower and graduate or professional student Direct PLUS Loan borrower shortly before the student borrower ceases at least half-time study at the school. The exit counseling must be in person, by audiovisual presentation, or by interactive electronic means. In each case, the school must ensure that an individual with expertise in the Title IV programs is reasonably available shortly after the counseling to answer the student borrower's questions. As an alternative, in the case of a student borrower enrolled in a correspondence program or a study-abroad program approved for credit at the home institution, the student borrower may be provided with written counseling materials within 30 days after the student borrower completes the program. If a student borrower withdraws from school without the school's prior knowledge or fails to complete the exit counseling as required, exit counseling must be provided either through 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 the school learns that the student borrower has withdrawn from school or failed to complete the exit counseling as required.

Noncompliance:

During the onsite portion of the review, the institution was unable to provide evidence of exit counseling having been conducted for students 2, 6, 9, 12, 14, 22, 25, 27, 28, 29 and 30. Subsequent to the onsite portion of the review, the institution sent the lead reviewer evidence of exit counseling for students 2, 6 and 14.

Required Action:

Due to the high percentage of deficiencies, SIT is required to perform a full file review for all students who were required to complete exit counseling during the 2012-2013 and 2013-2014 award years. SIT must identify any instances where an exit interview was not completed and when applicable, take immediate action to mail the required exit interview documentation to the student.

SIT must provide this office with the following information in a spreadsheet format:

1. Student's name
2. Student's social security number
3. Date student withdrew or graduated
4. Date the exit counseling was completed or mailed.

In addition to the spreadsheet, the institution's response must include a copy of the institution's procedures that will ensure exit interviews are completed and documented timely in the future.



September 9, 2014

Donald Steinberg
President
SIT
1 Kipling Road
Brattleboro, Vermont 05302-4801

UPS Tracking #:
1Z A87 964 9279 9806

RE: **Program Review Report**
OPE ID: 00886000
PRCN: 2014-201-28539

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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 SIT. The response should include a brief, written narrative for each finding that clearly states SIT's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, SIT must provide supporting documentation as required in each finding.

Please note that pursuant to HEA section 498A(b), the Department is required to:

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New York/Boston School Participation Division

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(b)(6)

Tracy M. Nave
Compliance Manager

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Prepared for
SIT

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An OFFICE of the U.S. DEPARTMENT of EDUCATION

PROUD SPONSOR of
the AMERICAN MIND™

OPE ID: 00886000
PRCN: 2014-201-28539

Prepared by
**U.S. Department of Education
Federal Student Aid
School Participation Division- New York/Boston**

Program Review Report

September 9, 2014

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 - (iv) Involve the construction, operation, or maintenance of any part of a facility used or to be used for religious worship or sectarian instruction; or
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1. Student's name
2. Student's social security number
3. Date student withdrew or graduated
4. Date the exit counseling was completed or mailed.

In addition to the spreadsheet, the institution's response must include a copy of the institution's procedures that will ensure exit interviews are completed and documented timely in the future.