

Index Sheet

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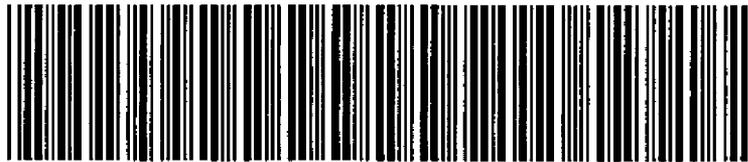
School Year: 2012

ACN:

PRCN: 201140427638

Box ID: 1407

Unique ID: SC1000000793416





November 8, 2012

Mr. John Euliano, President
Southern Technical College
1485 Florida Mall Avenue
Orlando, FL 32809-0000

UPS Tracking
#1Z A54 67Y 01 9205 1089

RE: **Final Program Review Determination**
OPE ID: #03903500
PRCN: #201140427638

Dear Mr. Euliano:

The U.S. Department of Education's (Department's) School Participation Division - Atlanta issued a program review report on March 15, 2012 covering Southern Technical College's (STC's) 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. STC's final response was received on June 13, 2012. A copy of the program review report (and related attachments) and STC's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by STC 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 and (3) notify the institution of its right to appeal.

The total liabilities due from the institution from this program review are \$228,785.00.

This FPRD contains detailed information about the liability determination for all findings.

Federal Student Aid, School Participation Division - Atlanta
61 Forsyth Street, S.W., Room 18T40, Atlanta, GA 30303-3104
www.FederalStudentAid.ed.gov

Federal Student Aid
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Appeal Procedures:

This constitutes the Department's FPRD with respect to the liabilities identified from the March 15, 2012 program review report. If STC wishes to appeal to the Secretary for a review of monetary liabilities established by the FPRD, the institution must file a written request for an administrative hearing. The Department must receive the request no later than 45 days from the date STC receives this FPRD. An original and four copies of the information STC 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

STC's 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 STC's 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).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact Pat Gilbert at (404) 974-9292. 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)

Charles Engstrom
Director

Enclosure:
Protection of Personally Identifiable Information

cc: Mr. Richard Bennett, Financial Aid Administrator
FL Commission for Independent Education – Florida Department of Education
Accrediting Council for Independent Colleges and Schools

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
Southern Technical College

OPE ID# 03903500
PRCN# 201140427638

Prepared by:
U.S. Department of Education
Federal Student Aid
School Participation Team - Atlanta

Final Program Review Determination
November 8, 2012

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A. Institutional Information

Southern Technical College
1485 Florida Mall Avenue
Orlando, FL 32809-0000

Type: Proprietary

Highest Level of Offering: Associate's Degree

Accrediting Agency: Accrediting Council for Independent Colleges and Schools

Current Student Enrollment: 1134 (2010/2011)

% of Students Receiving Title IV: 99.38% (2010/2011)

Title IV Participation: Grants Administrative and Payment System (G5):

	<u>2009/2010</u>	<u>2010/2011</u>
Federal Pell Grant	\$5,334,008	\$ 7,180,094
Federal Supplemental Educational Opportunity Grant (FSEOG)	\$ 19,779	\$ 25,000
Academic Competitiveness Grant (ACG)	\$ 11,868	\$ 10,015
Federal Direct Loan (DL)	\$7,131,380	\$12,264,937

Default Rate FFEL/DL: 2009 – 13.3%
2008 – 3.2%
2007 – 9.6%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Southern Technical College (STC) from August 29, 2011 to September 2, 2011. The review was conducted by Pat Gilbert, Sherry Blackman and Angelique James.

The focus of the review was to determine STC's compliance with the statutes and regulations as they pertain to the institution's administration of the Title IV, HEA programs. The review consisted of, but was not limited to, an examination of STC'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 2009/2010 and 2010/2011 (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. A program review report was issued on March 15, 2012.

Disclaimer:

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

Resolved Findings

STC has taken the corrective actions necessary to resolve findings 3-4, 6-8, and 10-13 of the program review report. Therefore, these findings may be considered closed. Appendix N contains the institution's written response related to the resolved findings. Findings requiring further action by STC are discussed below.

Resolved Finding with Comments

The following program review finding has been resolved by the institution, and may be considered closed. This finding is included solely for the purpose of discussing resolution of the finding.

Finding #9: Invalid High School Diploma

Citation Summary: 34 C.F.R. § 668.32(a)(2)(e)(1) states a student is eligible to receive Title IV, HEA program assistance if the student has a high school diploma or its recognized equivalent.

Noncompliance Summary: Two students appear to have invalid High School Diplomas.

Student #22's attestation stated he received a GED from Continental Academy located in Orlando, Florida in 2006.

Student #25's attestation stated he received a High School Diploma from Colonial High School in Orlando, Florida in May 2003.

Required Action Summary: The institution had to implement procedures to ensure the validity of high school diplomas before students are admitted and disbursed Title IV funds. A copy of the procedures had to be submitted in response to this report.

STC's Response: The institution developed a list of "Unacceptable High Schools" whose graduates do not qualify for admission to the College. Any student who claims graduation from a high school on the list must be refused admission to the College by the admissions representative. In addition, the Associate Dean is required to review all admission documentation. If a student is erroneously accepted for admission without a proper attestation, the Associate Dean is required to reverse the student's acceptance as a student at the College.

Final Determination:

If a school has reason to believe that a high school diploma is not valid or was not obtained from an entity that provides secondary school education, the institution must evaluate the validity of the student's high school completion. Students who indicate on their FAFSA that they graduated high school must give the name, city, and state of the high school. FAFSA on the Web will not allow students to skip these items, and it will have a drop-down list of both public and private high schools populated by the National Center for Education Statistics (NCES). Inclusion on the list does not mean that a

diploma from the school is valid, nor does exclusion from the list mean that the diploma is invalid.

Acceptable documentation for checking the validity of a student's high school completion can include the diploma and a final transcript that shows all the courses the student took. For students who completed their secondary schooling outside the United States, comparable documents can help, as can the services of companies that determine the validity of foreign secondary school credentials. Another resource is the state department of education in which the high school is located, if that department has jurisdiction over the high school. Colleges are also free to consult with each other as they develop their procedures for checking the validity of high school diplomas.

The Department does not expect schools to check the high school data for every student against other information obtained by the school during admissions, but if a school has reason to believe the high school diploma is dubious—e.g., the college knows the student bought the diploma or transcript and was required to perform little or no work—the diploma must be validated. A student's self-certification is not sufficient to validate the high school diploma that is in question. It should be remembered that for a college to be an eligible institution, it must admit as regular students only those with a high school diploma or the recognized equivalent or who are beyond the age of compulsory school attendance.

STC's practice of simply maintaining a list of unacceptable high schools and reviewing that list for admission is not sufficient. The institution should develop procedures to aid in the identification of invalid high school diplomas when an unfamiliar diploma or credential is presented to the College.

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 STC's response to the finding, and the Department's final determination for that finding. A copy of the program review report issued on March 15, 2012 is attached as Appendix (O).

Finding #1: Conflicting Information

Citation Summary: The ability of an institution to coordinate the information it collects and to resolve discrepancies are critical elements in an evaluation of its administrative capability. Regulations require institutions to develop 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. 34 C.F.R. § 668.16(b)(3) and (f)

Noncompliance Summary: *STC failed to resolve the discrepant information for the below students:*

Student #5: *The FAFSA signed on 11/6/2009 shows the student as single. Leave of Absence (LOA) paperwork dated 4/5/2010 and 11/22/2010 shows the student reason for the LOA as "separation" with spouse.*

Student #16: *The student was not selected for verification; however the student had a "C" code that needed to be resolved and the institution should have resolved all the discrepant information. The enrollment application shows the student as married. The student reported single on the FAFSA and reported only his income. The Household size was reported as 3.*

Student #22: *The student was not selected for verification. However, the student has a "C" code that needed to be resolved and the institution should have resolved all the discrepant information.*

- *Enrollment Agreement and Verification Worksheet show "married" and the FAFSA reported "single".*
- *Incorrect status of "Head of Household" used on Tax Form 1040*
- *"C" code for Selective Service was not resolved*

Student #25: *The student was not selected for verification for the 2010/2011 award year but was selected for the 2009/2010 award year. The enrollment agreement shows the student as a single male and the student answered "no" to the question on enrollment agreement regarding are you a single parent. The student FAFSA reported 2 in household size and on the verification worksheet for 2009/2010. The student also filed an amended tax return for 2008 changing the filing status as "single" rather than "head of household".*

Student #28: *The student was not selected for verification. However, the enrollment agreement shows the student as a single male and not a single parent. The FAFSA shows 2 in household size and the student answered "yes" to the question regarding children you support.*

Required Action Summary: *In response to this finding, STC was required to resolve the discrepant information for the students listed above and provide supporting documentation. STC was also required to conduct a file review of all the students for the 2009/2010 and 2010/2011 award years to determine if corrections to the household size would result in a change to the Estimated Family Contribution (EFC) where there is conflicting information regarding household size and answers given by students on either the FAFSA or the institution's enrollment agreement.*

In lieu of performing a file review for the entire population (1551) for 2009/2010 and (1932) for the 2010/2011 award year to determine actual liabilities, STC had the option

of performing this file review for only the remainder of the statistical sample not tested by the Department during the program review (308 for 2009/2010 and 320 for 2010/2011) in the statistical samples.

STC was required to engage an Independent Public Accountant (IPA) to test the file review completed by STC. The IPA was required to develop a set of procedures designed for testing the accuracy and completeness of the file review. The suggested procedures were required to be provided to Pat Gilbert within 30 days of the institution's receipt of this Program Review Report.

STC's Response: STC completed its review of the remaining students in the statistical samples for the 2009/2010 (308) and 2010/2011 (320) award years. The required electronic spreadsheet and IPA attestation were included with STC's response.

Regarding the students specifically referred to in the finding, the information provided by STC resolved student #s 16, 22, and 25. The institution agreed with the finding for student #28.

As for Student #5, STC claimed that the information provided by the student was consistent and indicated that the student was single. STC further alleged that the leave of absence (LOA) references in the student's academic file (as distinct from the financial aid file) were completed and placed in the file by the Registrar and reflected only the Registrar's perception of the situation. The Department rejects this conclusion. The discrepant information regarding the marital status was not resolved. STC's comments regarding the Registrar's perception does not constitute resolution. The student was disbursed Pell funds for 2009/2010 in the amount of \$3,567. This amount will be added to the liabilities in the projection matrix.

The institution further stated that results from the IPA's report showed that there was a very small percentage of files with discrepant information. Out of the population of files examined, there was an error rate of 0.34% of the files in the 2009/2010 award year and 1.61% of the files in the 2010/2011 award year. Based on the resolution of the files identified above and the IPA report of the audited file review, the institution believes that there is no material pattern of failing to resolve conflicting information.

Final Determination: The Institution failed to properly resolve the discrepant information for the two students identified above-- #s 5 and 28 and the funds must be returned.

The Department has projected liabilities based on the results of the review of statistical samples completed by STC. An average liability was calculated for the statistical samples for each Title IV, HEA program with liabilities and this average was multiplied against the population being reviewed.

STC's response indicated that the total amount of Pell Grant liabilities in the statistical sample for the 2009/2010 award year is \$7,134 plus the \$3,567 for student #5 equals \$10,701. An average liability of \$34.74 was calculated by dividing \$10,701 by the number of students in the statistical sample (308). This average liability was then multiplied by the total number of students in the population (1551) from which the statistical sample was derived. See Appendix B

STC's response indicated that the total amount of Pell Grant liabilities in the statistical sample for the 2010/2011 award year is \$5,750 plus the \$1,850 for student #28 equals \$7,600. An average liability of \$23.75 was calculated by dividing \$7,600 by the number of students in the statistical sample (320). This average liability was then multiplied by the total number of students in the population (1932) from which the statistical sample was derived. See Appendix C

Therefore the Pell Grant projected liability amount for this finding that STC must pay to the Department is \$53,881.74 for 2009/2010 and \$45,885.00 for 2010/2011 for a total of \$99,766.74. The institution is also liable for the cost of those funds (Appendix D) in the amount of \$1,246.75

Total Liabilities for this finding: \$101,013.49

Finding #2: Incomplete Verification

***Citation Summary:** If the Central Processing System (CPS) selects an application for verification, an institution must verify five major data elements (household size, number enrolled in college, adjusted gross income (AGI), U.S. income tax paid, and certain untaxed income and benefits). An institution can verify AGI and U.S. income tax paid by getting a copy of the signed U.S. income tax return. If a copy of the tax return is not available, the student must instead submit a copy of any IRS form that lists tax information and provides the information needed for verification. The form must be signed by the student unless the IRS sent the form directly to the school. 34 C.F.R. §§ 668.56, 668.57*

***Noncompliance Summary:** Student #10 was selected for verification for the 2008/2009 award year. The FAFSA shows the student as married. The student's filing status on the 2008 tax return shows "head of household;" this is an incorrect filing status. The student was disbursed Pell funds in the amount of \$3154, subsidized loans of \$3500 and unsubsidized loans of \$5850. For the 2009/2010 award year, the student was not selected for verification. However, the tax return only shows 3 exemptions but the household size is 6 on the FAFSA. The student was disbursed Pell funds in the amount of \$5350, subsidized loans of \$4500 and unsubsidized loans of \$6000.*

***Required Action Summary:** STC had to obtain the proper IRS tax forms to complete the verification process.*

STC Response: STC concurred with the finding and was unable to provide the required corrected tax documents.

Final Determination: The Institution failed to complete verification and must return for the 2008/2009 award year \$3,154 in Pell funds, \$3,500 in Subsidized DL funds and \$5,850 in Unsubsidized DL funds. For the 2009/2010 award year, STC must return \$5,350 in Pell funds, \$4,500 in Subsidized DL funds and \$6,000 in Unsubsidized DL funds.

Pell funds identified total \$8,504. The institution is also liable for the cost of those funds (Appendix E) in the amount of \$341.21

Direct Loan funds identified total \$19,850; however the Department will use the Estimated Actual Loss (EAL) formula (Appendix F) to establish liabilities.

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 EAL to the Department that has resulted or will result from those ineligible loans is based on STC's most recent cohort default rate available during the disbursement period. As a result, the estimated actual loss that STC must pay to the Department for the Incomplete Verification is \$2,535.72. A copy of the results of that calculation is included as Appendix G.

Total Liabilities for this finding: \$11,380.93

Finding #5: Pell Underpayments/Overpayments

Citation Summary: If an institution uses credit hours and academic terms to measure a student's progress, then the student's enrollment status (full-time, three-quarter time, half-time or less than half-time) is used to calculate the amount of the student's Federal Pell Grant payment. A school may use its own standards for enrollment status, provided the standards meet the minimum requirements defined in regulations. 34 C.F.R. § 690.63(c)

Noncompliance Summary: The students identified below were overpaid due to their enrollment status:

Student #3: Enrolled for 6 hours (1/2 time) for Summer C. The student was disbursed Pell funds in the amount of \$1784 for full time status. The student should have received \$891.00. The school returned \$189.52 on 11/1/2009 based on the student's withdrawal.

Student #7: Enrolled for 1.5 hours for Winter B. The student was disbursed \$1850 in Pell funds for full-time enrollment. The student should have only received \$1388.

Student #12: Enrolled for 9 hours for Summer C. The student was disbursed \$1850 in Pell funds for full-time enrollment. The student should have only received \$1388. The student was enrolled for Winter B and Winter C for 9 hours and received Pell funds in the amount of \$1850. The student should have only received \$1388.

Student #13: Enrolled for 10.5 hours for Summer C. The Pell funds were not disbursed prior to the student withdrawing; however the school used the full time Pell of \$1783 in the R2T4 calculation.

Student #16: Enrolled for 4.5 hours (less than ½ time) for Summer B. The student was disbursed \$1850 in Pell funds for full-time enrollment. The student should have only received \$463.

Student #18: Enrolled for 10.5 hours (¾ time) for Winter C and was paid \$1850 in Pell funds for full-time enrollment. The student should have only received \$1388.

Student #28: Enrolled for Spring C term for 18 hours from 6/13/2011 – 9/1/2011. The student signed an appeal form showing he was recalled to attend Army training in Chaffee, Arkansas from 7/15/2011 – 7/30/2011. The attendance record shows the student was required to attend 64 hours and only attended 12 hours during that time period. The form was not processed due to excessive absences.

Required Action Summary: STC was required to conduct a file review of all students for the 2009/2010 and 2010/2011 award years and identify additional students who received ineligible Title IV funds. STC had to engage an Independent Public Accountant (IPA) to test the file review completed by STC.

STC also had to develop and submit with its response, procedures which will ensure that, in the future, Title IV funds are calculated using the correct enrollment status.

STC Response: Regarding the students specifically referred to in the finding, the information provided by STC resolved student #s 12, 13, 16, 18, and 28. The institution agreed with the finding for student #s 3 and 7.

The IPA found a 0.28% overpayment error rate for the 2009/2010 award year and an underpayment error rate of 0.13% for the 2010/2011 award year, resulting in an overpayment of Pell funds for 2009/2010 of \$14,104 and an underpayment of \$8,901 for the 2010/2011 award year.

Final Determination: Student #7 will be added to the file review spreadsheet for the 2009/2010 award year in the amount of \$462.50. Student #3 was already included on the spreadsheet.

STC conducted a 100% file review for the 2009/2010 and 2010/2011 award year. The results of the review identified Pell Grant overpayments for the 2009/2010 award year for 87 students (86 identified through file review plus student #7) in the amount of \$49,612.53. The Pell Grant overpayments for the 2010/2011 award year were \$31,976.87 for 52 students. See Appendices H and I. Please note that because Federal Pell Grants are student specific underpayments cannot be netted with overpayments.

The Institution is also liable for the cost of those funds (Appendix J) in the amount of \$1,075.07.

As a result of the file review conducted, several students were identified as being enrolled less than ½ time. For the 2009/2010 award year, 11 students were identified for a total of \$22,384.00 in Subsidized DL funds and \$38,825.00 in Unsubsidized DL funds. For the 2010/2011 award year, 26 students were identified for a total of \$56,248.00 in Subsidized DL funds and \$70,298.00 in Unsubsidized DL funds. See Appendices K and L

Direct Loan funds identified total \$187,755.00; however the Department will once again use its EAL formula for establishing liabilities.

As a result the estimated actual loss that STC must pay to the Department for the ineligible loans is \$33,724.68. A copy of the results of that calculation is included as Appendix M.

D. Summary of Liabilities

Established Liabilities

Initial Liabilities	Pell (Closed Award Year)	DL/ FFEL/EAL	
Finding # 1	\$ 99,767		
Finding # 2	\$ 8,504		
Finding # 5	\$ 81,590		
Subtotal 1	\$189,861		
Interest/SA #1	\$1,247		
Interest/SA #2	\$ 341	\$2,536	
Interest/SA #5	\$1,075	\$33,725	
Subtotal 2	\$2,663	\$36,261	
TOTAL	\$192,524	\$36,261	
Payable To:	Totals \$228,785		
Department	\$192,524	\$36,261	\$228,785
Students	\$0	\$0	\$0
Total Liabilities	\$192,524	\$36,261	\$228,785

E. Payment Instructions

STC owes to the Department \$228,785.00. 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 GAPS/G5 will not be accepted as payment of this liability.**

The following identification data must be provided with the payment:

Amount:	\$228,785
DUNS:	106015451
TIN:	593729236
PRCN:	201140427638

STC owes to the Department \$228,785.00. This liability must be paid using an electronic transfer of funds through the Treasury Financial Communications System, which is known as FEDWIRE. STC must make this transfer within **45 days of the date of this letter**. This repayment through FEDWIRE is made via the Federal Reserve Bank in New York. If STC's bank does not maintain an account at the Federal Reserve Bank, it must use the services of a correspondent bank when making the payments through FEDWIRE.

Any liability of \$100,000 or more identified through a program review must be repaid to the Department via FEDWIRE. The Department is unable to accept any other method of payment in satisfaction of these liabilities.

Instructions for completing the electronic fund transfer message format are included on the attached FEDWIRE form. (Appendix P).

The disbursement record for each student must be adjusted in the Common Origination and Disbursement (COD) System based on the recalculated amount identified in the attached Appendices H and I only.

If the adjustment to the disbursement record(s) creates a negative balance, the difference must be returned to G5 electronically. A copy of the adjustment to each student's COD record, as well as proof of the return of funds, if applicable, must be sent to Pat Gilbert **within 45 days of the date of this letter**.

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. STC is also responsible for

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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 STC's 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 6111
Washington, DC 20202-4461
Attn: Cindy Dixon

If within 45 days of the date of this letter, STC 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 STC from the Federal Government. **STC may object to the collection by offset only by challenging the existence or amount of the debt.** To challenge the debt, STC 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.

Accounting Document – Prior Year Monetary Recovery (AD-PYMR)

Institution: Southern Technical College

City, State: Orlando, FL 32809-0000

PRCN: 140427638

TIN: 593729236

DUNS: 106015451

Reviewer: Pat Gilbert

Region: IV

Date: October 31, 2012

Programs	Type	Amount	Funding Code	Object Class
Federal Pell Grant (Closed AY)	Principal	\$81,466.00	3220RNOYR	69017
	Interest	\$ 2,663.00	1435RNOYR	64020

FSEOG	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020

FWS	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020

ACG	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020

National SMART	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020

TOTAL (Pell-Closed AY, FSEOG, FWS, ACG, National SMART)	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020

Direct Loan and Direct Loan EAL	Principal		4253XNOYR	53020 or 53010
	Interest	\$36,261.00	4253XNOYR	53040

FFEL and FFEL EAL	Interest/ SA/EAL		4251XNOYR	53020
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Federal Perkins	Principal		2915RNOYR	53054
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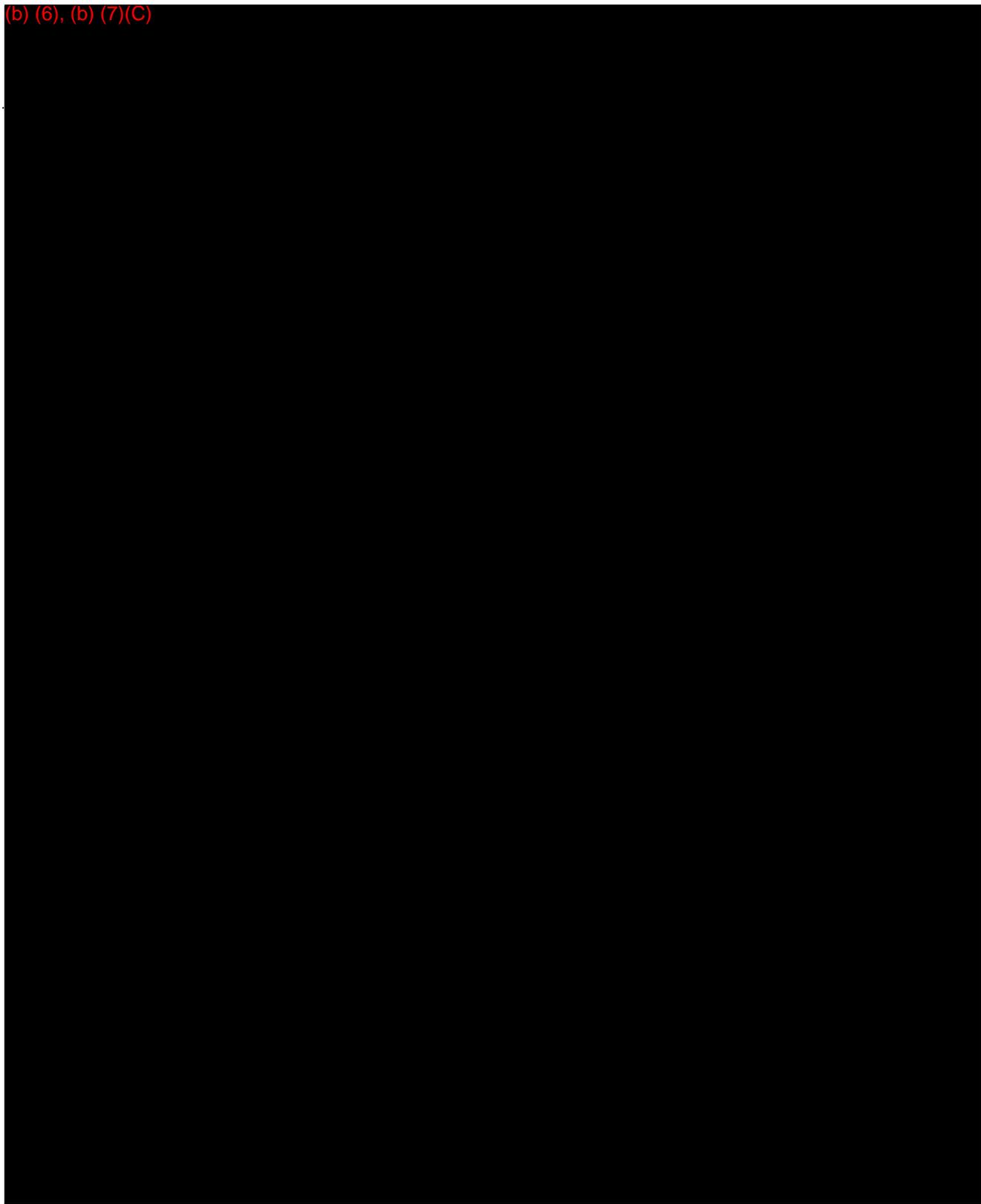
Add rows if necessary			Amount			G5 Program Award # *
Negative Cash Balance (Pell, FWS, FSEOG, ACG, SMART, TEACH)	Program Pell (08/09)	Principal	\$ 3,154.00	3875FNOYR	69020	P063P085675
	Pell (09/10)	Principal	\$65,663.53	3875FNOYR	69020	P063P095675
	Pell (10/11)	Principal	\$39,576.87	3875FNOYR	69020	P063P105675
	Program	Interest		1435RNOYR	64020	Sent to Treasury
DL Unsubstantiated / Excess Cash	Leave blank	Principal		3875FNOYR	69020	
	Leave blank	Interest		4253XNOYR	53040	Sent to DL Fund

Comments:

* Example of G5 Award # (P063P104306, first 5 digits = program, next 2 digits = award year, next 4 digits = code unique to school)

See FPRD Distribution Form for distribution information for this form and related program review documents.

(b) (6), (b) (7)(C)



Southern Technical College
OPE ID# 03903500
PRCN# 201140427638

Appendix A – Student Sample

Student Sample

2009/2010

Student's Name

**Student's SSN (last four
digits Only)**

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

201

Southern Technical College
OPE ID# 03903500
PRCN# 201140427638

**Appendix B – Finding #1
2009/2010 Projection Matrix**

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

0.00
0.00
0.00
0.00
0.00
0.00
0.00
0.00
0.00
0.00
0.00
0.00
0.00
0.00
0.00
0.00

**#REF1
Liability Projection**

	Pell
Total Liability in Sample	\$10,701.00
Number of Students in Population	1551
Number of Students in Sample	308
Average Liability Per Student in Sample	\$34.74
UCL:	\$124,264.83
Projected Liability	\$53,881.74
LCL:	(\$16,501.35)
UCL:	0.7%
Projected Fatal Error Rate	0.6%
LCL:	0.6%
Standard Deviation	453,885.343
Plus/Minus for UCL/LCL	70383.09
Records	308

Southern Technical College
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**Appendix C – Finding #1
2010/2011 Projection Matrix**

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

0.00
0.00
0.00
0.00
0.00
0.00
0.00
0.00
0.00
0.00
0.00
0.00

0

#REF!
Liability Projection

	Pell
Total Liability in Sample	\$7,600.00
Number of Students in Population	1932
Number of Students in Sample	320
Average Liability Per Student in Sample	\$23.75
	0
UCL:	\$111,115.70
Projected Liability	\$45,885.00
LCL:	(\$19,345.70)
	0
UCL:	0.7%
Projected Fatal Error Rate	0.6%
LCL:	0.6%
	0
Standard Deviation	337.353242
Plus/Minus for UCL/LCL	65230.70
	0
Records	320

Southern Technical College
OPE ID# 03903500
PRCN# 201140427638

Appendix D – Finding #1
Cost of Funds

Southern Technical College
OPE ID# 03903500
PRCN# 201140427638

Appendix E – Finding #2

Cost of Funds

Southern Technical College
OPE ID# 03903500
PRCN# 201140427638

Appendix F – Estimated Actual Loss Formula

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)

$$\begin{aligned}
 & \$40,000/2 \times (451 \times (.0422/365)) \\
 & + \$40,000/2 \times (730 \times (.0625/365)) \\
 & + \$40,000/2 \times (367 \times (.0707/365)) = \$4,964.61
 \end{aligned}$$

Unsubsidized Loan Amount (Special Allowance Only)

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

Southern Technical College
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PRCN# 201140427638

Appendix G – Finding #2
Estimated Actual Loss Calculation

Appendix <D> Estimated Actual Loss Worksheet

Name of Institution Southern Technical College

1. Select Type	Two-Year
2. Select Award Year	2008-09
3. Enter Cohort Default Rate and/or Perkins Default Rate	3.2%

4. Enter Ineligible Principal	Ineligible Principal	Estimated Defaults
a. DL Subsidized	\$ 3,500.00	\$ 112.00
b. DL Unsubsidized	\$ 5,850.00	\$ 187.20
c. FFEL Subsidized		\$ -
d. FFEL Unsubsidized		\$ -
e. PLUS (DL, FFEL)		\$ -
f. Perkins		\$ -

Disb to Repayment	774
Repayment to Default	498
Repayment to PIF	1580

Estimated Actual Loss Interest and Special Allowance Breakdown	Disb to Repayment	
	DL Subsidized	\$ 404.91
	FFEL Sub	\$ -
	FFEL Unsub	\$ -
	Repayment to Default	
	FFEL Subsidized	\$ -
	FFEL Unsub	\$ -
	Repayment to PIF	
	FFEL Subsidized	\$ -
	FFEL Unsub	\$ -
	Perkins Interest	\$ -

Totals - Estimated Actual Loss By Program (Including Interest and Special Allowance)		
	DL Subsidized	\$ 516.91
	DL Unsubsidized	\$ 187.20
	FFEL Subsidized	\$ -
	FFEL Unsub	\$ -
	PLUS (DL, FFEL)	\$ -
	Perkins	\$ -

Total Estimated Actual Loss Liability **\$ 704.11**

The "Total Estimated Liability" shown on this worksheet is the Department's estimate of the "actual loss" to the Department that has or will result from the ineligible FFEL and Direct Loan program loans made by your institution. Estimated defaults are calculated using the most appropriate cohort default rate published by the Department.

The Department's loss for excess subsidies paid to lenders for ineligible loans is estimated by using the average number of days from:

- disbursement to entering repayment,
- repayment to default, and
- repayment to paid-in-full.

The averages used are from historical information supplied to the Department from all guarantee agencies.

Appendix <D> Estimated Actual Loss Worksheet

Name of Institution Southern Technical College

1. Select Type	Two-Year
2. Select Award Year	2009-10
3. Enter Cohort Default Rate and/or Perkins Default Rate	13.3%

4. Enter Ineligible Principal	Ineligible Principal	Estimated Defaults
a. DL Subsidized	\$ 4,500.00	\$ 598.50
b. DL Unsubsidized	\$ 6,000.00	\$ 798.00
c. FFEL Subsidized		\$ -
d. FFEL Unsubsidized		\$ -
e. PLUS (DL, FFEL)		\$ -
f. Perkins		\$ -

Disb to Repayment	774
Repayment to Default	498
Repayment to PIF	1580

Estimated Actual Loss Interest and Special Allowance Breakdown	Disb to Repayment	
	DL Subsidized	\$ 435.11
	FFEL Sub	\$ -
	FFEL Unsub	\$ -
	Repayment to Default	
	FFEL Subsidized	\$ -
	FFEL Unsub	\$ -
	Repayment to PIF	
	FFEL Subsidized	\$ -
	FFEL Unsub	\$ -
	Perkins Interest	\$ -

Totals - Estimated Actual Loss By Program (Including Interest and Special Allowance)		
	DL Subsidized	\$ 1,033.61
	DL Unsubsidized	\$ 798.00
	FFEL Subsidized	\$ -
	FFEL Unsub	\$ -
	PLUS (DL, FFEL)	\$ -
	Perkins	\$ -

Total Estimated Actual Loss Liability **\$ 1,831.61**

The "Total Estimated Liability" shown on this worksheet is the Department's estimate of the "actual loss" to the Department that has or will result from the ineligible FFEL and Direct Loan program loans made by your institution. Estimated defaults are calculated using the most appropriate cohort default rate published by the Department.

The Department's loss for excess subsidies paid to lenders for ineligible loans is estimated by using the average number of days from:
 - disbursement to entering repayment,
 - repayment to default, and
 - repayment to paid-in-full.

The averages used are from historical information supplied to the Department from all guarantee agencies.

Southern Technical College
OPE ID# 03903500
PRCN# 201140427638

**Appendix H – Finding #5
2009/2010 File Review**

Finding #5 Pell Underpayments/Overpayments
2009/2010

Student Name	SSN	Previous Enrollment Status 2009-10	Correct Enrollment Status 2009-10	STC 2009-10 PELL TOTAL	SST SAMPLE PELLTOTAL	SST Awarding Errors?	Award Year	SST SAMPLE PELL LIABILITY
1	(b)(6); (b)(7)(C)			\$3,567.00	\$3,122.00	no		\$445.00
2		Full Time	Half Time	\$2,985.80	\$2,676.00	Yes	2009-10	\$309.80
3		Full Time	3/4 Time	\$7,134.00	\$6,688.00	Yes	BOTH	\$446.00
4		Full Time	3/4 Time	\$1,784.00	\$1,338.00	Yes	2009-10	\$446.00
5		Full Time	3/4 Time	\$1,784.00	\$1,338.00	Yes	2009-10	\$446.00
6		Full Time	Half Time	\$1,594.48	\$892.00	Yes	2009-10	\$702.48
7		Full Time	Full Time	\$3,567.00	\$3,122.00	Yes	2009-10	\$445.00
8		Full Time	3/4 Time	\$3,567.00	\$3,122.00	Yes	BOTH	\$445.00
9		Full Time	Less Than 1/2 Time	\$1,784.00	\$446.00	Yes	2009-10	\$1,338.00
10		Full Time	3/4 Time	\$5,350.00	\$4,905.00	Yes	2009-10	\$445.00
11		Full Time	3/4 Time	\$5,350.00	\$4,905.00	Yes	2009-10	\$445.00
12		Full Time	3/4 Time	\$1,784.00	\$1,338.00	Yes	2009-10	\$446.00
13		Full Time	3/4 Time	\$1,784.00	\$1,338.00	Yes	2009-10	\$446.00
14		Full Time	3/4 Time	\$5,350.00	\$4,905.00	Yes	BOTH	\$445.00
15		Full Time	Less Than 1/2 Time	\$5,350.00	\$4,012.00	Yes	2009-10	\$1,338.00
16		Full Time	3/4 Time	\$1,784.00	\$1,338.00	Yes	2009-10	\$446.00
17		Full Time	3/4 Time	\$3,567.00	\$3,121.25	Yes	2009-10	\$445.75
18		Full Time	3/4 Time	\$7,834.00	\$6,688.00	Yes	BOTH	\$1,146.00
19		Full Time	3/4 Time	\$5,350.00	\$4,904.00	Yes	BOTH	\$446.00
21		Full Time	3/4 Time	\$3,567.00	\$3,121.00	Yes	2009-10	\$446.00
22		Full Time	Less Than 1/2 Time	\$7,134.00	\$5,746.00	Yes	BOTH	\$1,388.00
23		Full Time	Full Time	\$3,567.00	\$2,675.00	Yes	BOTH	\$892.00
24		Full Time	3/4 Time	\$3,567.00	\$3,121.00	Yes	BOTH	\$446.00
25		Full Time	3/4 Time	\$5,350.00	\$4,755.00	Yes	2009-10	\$595.00
26		Full Time	3/4 Time	\$5,350.00	\$4,904.00	Yes	BOTH	\$446.00
27		Full Time	3/4 Time	\$5,350.00	\$4,904.00	Yes	BOTH	\$446.00
28		Full Time	3/4 Time	\$7,134.00	\$6,688.00	Yes	BOTH	\$446.00
29		Full Time	3/4 Time	\$5,350.00	\$4,904.00	Yes	BOTH	\$446.00
30		Full Time	Half Time	\$5,350.00	\$4,755.00	Yes	BOTH	\$595.00
31		Full Time	Half Time	\$5,350.00	\$4,459.00	Yes	2009-10	\$891.00
32		Full Time	Full Time	\$5,350.00	\$5,201.00	Yes	2009-10	\$149.00
33		Full Time	Full Time	\$5,350.00	\$4,755.00	Yes	2009-10	\$595.00

Finding #5 Pell Underpayments/Overpayments
2009/2010

34	(b)(6); (b)(7)(C)	Full Time	Half Time	\$7,134.00	\$6,242.00	Yes	2009-10	\$892.00
35		Full Time	3/4 Time	\$7,134.00	\$6,688.00	Yes	BOTH	\$446.00
36		Full Time	3/4 Time	\$3,567.00	\$3,121.00	Yes	BOTH	\$446.00
37		Full Time	3/4 Time	\$5,200.00	\$4,875.00	Yes	BOTH	\$325.00
38		Full Time	Less Than 1/2 Time	\$3,567.00	\$2,229.00	Yes	BOTH	\$1,338.00
39		Full Time	3/4 Time	\$3,567.00	\$3,121.00	Yes	2009-10	\$446.00
40		Full Time	3/4 Time	\$5,350.00	\$4,904.00	Yes	2009-10	\$446.00
41		Full Time	3/4 Time	\$7,134.00	\$6,688.00	Yes	2009-10	\$446.00
42		Full Time	Full Time	\$7,134.00	\$6,688.00	Yes	BOTH	\$446.00
43		Full Time	3/4 Time	\$7,134.00	\$6,688.00	Yes	2009-10	\$446.00
44		Full Time	Full Time	\$5,350.00	\$5,201.00	Yes	2009-10	\$149.00
45		Full Time	3/4 Time	\$1,867.00	\$1,750.00	Yes	BOTH	\$117.00
46		Full Time	3/4 Time	\$7,134.00	\$5,350.00	Yes	BOTH	\$1,784.00
47		Full Time	Half Time	\$1,900.00	\$1,584.00	Yes	2009-10	\$316.00
48		Full Time	Full Time	\$7,134.00	\$6,688.00	Yes	BOTH	\$446.00
49		Full Time	3/4 Time	\$3,567.00	\$3,121.00	Yes	BOTH	\$446.00
50		Full Time	Full Time	\$7,134.00	\$6,688.00	Yes	BOTH	\$446.00
51		Full Time	3/4 Time	\$7,134.00	\$6,688.00	Yes	BOTH	\$446.00
52		Full Time	3/4 Time	\$7,134.00	\$6,242.00	Yes	BOTH	\$892.00
53		Full Time	3/4 Time	\$7,134.00	\$6,688.00	Yes	2009-10	\$446.00
54		Full Time	3/4 Time	\$5,350.00	\$4,904.00	Yes	2009-10	\$446.00
55		Full Time	Less Than 1/2 Time	\$1,333.00	\$1,083.00	Yes	BOTH	\$250.00
56		Full Time	Half Time	\$4,698.12	\$3,806.12	Yes	2009-10	\$892.00
57		Full Time	3/4 Time	\$7,134.00	\$6,688.00	Yes	BOTH	\$446.00
58		Full Time	3/4 Time	\$7,134.00	\$6,688.00	Yes	2009-10	\$446.00
59		Full Time	Full Time	\$5,350.00	\$5,201.00	Yes	2009-10	\$149.00
60		Full Time	Half Time	\$5,350.00	\$4,458.00	Yes	2009-10	\$892.00
61		Full Time	3/4 Time	\$5,350.00	\$4,012.00	Yes	2009-10	\$1,338.00
62		Full Time	3/4 Time	\$7,134.00	\$6,688.00	Yes	2009-10	\$446.00
63		Full Time	Half Time	\$5,350.00	\$4,458.00	Yes	2009-10	\$892.00
64		Full Time	3/4 Time	\$5,350.00	\$4,904.00	Yes	2009-10	\$446.00
65		Full Time	3/4 Time	\$7,134.00	\$6,539.00	Yes	2009-10	\$595.00
66		Full Time	3/4 Time	\$3,567.00	\$3,121.00	Yes	2009-10	\$446.00
67		Full Time	3/4 Time	\$7,134.00	\$6,539.00	Yes	2009-10	\$595.00
68	Full Time	3/4 Time	\$5,350.00	\$4,904.00	Yes	2009-10	\$446.00	
69	Full Time	3/4 Time	\$3,567.00	\$3,121.00	Yes	2009-10	\$446.00	

**Finding #5 Pell Underpayments/Overpayments
2009/2010**

70	(b)(6); (b)(7)(C)	Full Time	Half Time	\$5,350.00	\$4,458.00	Yes	2009-10	\$892.00
71		Full Time	Half Time	\$3,567.00	\$2,377.00	Yes	2009-10	\$1,190.00
72		Full Time	Full Time	\$3,567.00	\$3,121.00	Yes	BOTH	\$446.00
73		Full Time	3/4 Time	\$7,134.00	\$6,688.00	Yes	BOTH	\$446.00
74		Full Time	Full Time	\$5,350.00	\$4,904.00	Yes	BOTH	\$446.00
75		Full Time	3/4 Time	\$7,134.00	\$6,688.00	Yes	2009-10	\$446.00
76		Full Time	3/4 Time	\$7,134.00	\$6,688.00	Yes	2009-10	\$446.00
77		Full Time	3/4 Time	\$7,134.00	\$6,539.00	Yes	2009-10	\$595.00
78		Full Time	3/4 Time	\$7,133.00	\$6,688.00	Yes	BOTH	\$445.00
79		Full Time	3/4 Time	\$7,134.00	\$6,688.00	Yes	2009-10	\$446.00
80		Full Time	3/4 Time	\$5,350.00	\$4,904.00	Yes	BOTH	\$446.00
81		Full Time	3/4 Time	\$7,134.00	\$6,688.00	Yes	2009-10	\$446.00
82		Full Time	Half Time	\$5,350.00	\$4,458.00	Yes	2009-10	\$892.00
83		Full Time	3/4 Time	\$7,134.00	\$6,688.00	Yes	2009-10	\$446.00
84		Full Time	3/4 Time	\$5,350.00	\$4,904.00	Yes	2009-10	\$446.00
85		Full Time	Half Time	\$1,784.00	\$892.00	Yes	2009-10	\$892.00
86	Full Time	3/4 Time	\$3,567.00	\$2,972.00	Yes	2009-10	\$595.00	
		Full Time	3/4	\$1,850.00	\$1,387.50			\$462.50
								\$49,612.53

Southern Technical College
OPE ID# 03903500
PRCN# 201140427638

Appendix I – Finding #5
2010/2011 File Review

Finding #5
Pell Underpayment/Overpayments
2010/2011

Student Name	SSN	Previous Enrollment Status 2010-11	Correct Enrollment Status 2010-11	STC 2010-11 PELL TOTAL	SST SAMPLE PELL TOTAL	SST Awarding Errors?	Award Year	SST SAMPLE PELL LIABILITY
(b)(6); (b)(7)(C)		3/4 Time	3/4 Time	\$3,237.50	\$3,138.00	Yes	2010-11	\$99.50
		Full Time	Half Time	\$1,545.62	\$925.00	Yes	2010-11	\$620.62
		Full Time	3/4 Time	\$1,850.00	\$1,388.00	Yes	2010-11	\$462.00
		Full Time	Less Than 1/2 Time	\$1,545.62	\$1,082.62	Yes	2010-11	\$463.00
		Full Time	3/4 Time	\$1,850.00	\$1,388.00	Yes	2010-11	\$462.00
		Full Time	Full Time	\$5,550.00	\$5,088.00	Yes	2010-11	\$462.00
		Full Time	Half Time	\$3,210.27	\$2,775.00	Yes	2010-11	\$435.27
		Full Time	Less Than 1/2 Time	\$940.17	\$462.00	Yes	2010-11	\$478.17
		Full Time	Half Time	\$1,850.00	\$925.00	Yes	2010-11	\$925.00
		0		\$3,700.00	\$3,080.00	no		\$620.00
		Full Time	3/4 Time	\$7,400.00	\$6,938.00	Yes	BOTH	\$462.00
		Full Time	Less Than 1/2 Time	\$3,210.54	\$2,312.00	Yes	2010-11	\$898.54
		Full Time	3/4 Time	\$3,700.00	\$3,238.00	Yes	2010-11	\$462.00
		Full Time	3/4 Time	\$1,850.00	\$1,388.00	Yes	2010-11	\$462.00
		Full Time	Less Than 1/2 Time	\$571.65	\$462.00	Yes	2010-11	\$109.65
		Full Time	Full Time	\$5,550.00	\$5,088.00	Yes	2010-11	\$462.00
		Full Time	3/4 Time	\$1,850.00	\$1,388.00	Yes	2010-11	\$462.00
		Full Time	3/4 Time	\$1,850.00	\$1,388.00	Yes	2010-11	\$462.00
		Full Time	Full Time	\$2,467.00	\$1,850.00	Yes	2010-11	\$617.00
		Full Time	Half Time	\$1,545.62	\$925.00	Yes	2010-11	\$620.62
		Full Time	Half Time	\$3,237.50	\$2,775.00	Yes	2010-11	\$462.50
		Full Time	3/4 Time	\$6,167.00	\$5,396.00	Yes	2010-11	\$771.00
		Full Time	Half Time	\$3,083.00	\$2,620.00	Yes	BOTH	\$463.00
		Full Time	3/4 Time	\$3,700.00	\$3,546.00	Yes	2010-11	\$154.00
		Full Time	3/4 Time	\$5,550.00	\$4,471.00	Yes	BOTH	\$1,079.00
		Full Time	3/4 Time	\$7,400.00	\$6,938.00	Yes	2010-11	\$462.00
		Full Time	3/4 Time	\$6,376.03	\$5,814.03	Yes	2010-11	\$562.00
		Full Time	3/4 Time	\$7,400.00	\$6,938.00	Yes	2010-11	\$462.00
		Full Time	Less Than 1/2 Time	\$2,467.00	\$1,850.00	Yes	2010-11	\$617.00
		Half Time	3/4 Time	\$3,083.00	\$2,621.00	Yes	2010-11	\$462.00
		Full Time	Less Than 1/2 Time	\$4,934.00	\$3,855.00	Yes	2010-11	\$1,079.00
		Full Time	3/4 Time	\$3,700.00	\$3,083.00	Yes	BOTH	\$617.00
		Full Time	3/4 Time	\$1,850.00	\$1,388.00	Yes	2010-11	\$462.00
		Full Time	Full Time	\$5,550.00	\$3,287.00	Yes	BOTH	\$2,263.00
		Full Time	3/4 Time	\$3,600.00	\$3,300.00	Yes	2010-11	\$300.00
		Full Time	3/4 Time	\$7,400.00	\$6,937.00	Yes	2010-11	\$463.00

**Finding #5
Pell Underpayment/Overpayments**

		2010/2011				
37	(b)(6); (b)(7)(C)	Full Time	3/4 Time	\$3,700.00	\$3,083.00	Yes BOTH \$617.00
38		Full Time	Half Time	\$1,850.00	\$617.00	Yes BOTH \$1,233.00
39		Full Time	3/4 Time	\$1,233.00	\$1,080.00	Yes 2010-11 \$153.00
40		Full Time	3/4 Time	\$7,400.00	\$6,938.00	Yes 2010-11 \$462.00
41		Full Time	Half Time	\$6,278.75	\$5,353.75	Yes 2010-11 \$925.00
42		Full Time	Less Than 1/2 Time	\$5,550.00	\$4,317.00	Yes BOTH \$1,233.00
43		Full Time	3/4 Time	\$3,700.00	\$3,254.00	Yes 2010-11 \$446.00
44		Full Time	3/4 Time	\$7,400.00	\$6,012.00	Yes 2010-11 \$1,388.00
45		Full Time	3/4 Time	\$7,400.00	\$6,937.00	Yes 2010-11 \$463.00
46		Half Time	Less Than 1/2 Time	\$2,775.00	\$2,467.00	Yes 2010-11 \$308.00
47		Full Time	3/4 Time	\$5,550.00	\$4,933.00	Yes 2010-11 \$617.00
48		Full Time	Half Time	\$5,087.50	\$4,762.50	Yes 2010-11 \$325.00
49		Full Time	Half Time	\$7,400.00	\$6,475.00	Yes 2010-11 \$925.00
50		Full Time	Half Time	\$4,625.00	\$4,317.00	Yes 2010-11 \$308.00
51	3/4 Time	Half Time	\$6,937.50	\$6,475.00	Yes 2010-11 \$462.50	
52	Full Time	Half Time	\$4,162.50	\$2,775.00	Yes BOTH \$1,387.50	
						\$31,976.87

Southern Technical College
OPE ID# 03903500
PRCN# 201140427638

Appendix J – Finding #5
Cost of Funds

Ineligible Disbursements (Non-Loan) - Cost of Funds and Administrative Cost Allowance

Name of Institution: Southern Technical College - Finding #5

No.	Description/Name	Ineligible Disbrsmnt	Program	Disburseme nt Date	Return Paid Date	No. of Days	CVFR or Interest	Federal Share	To ED	To Inst Accounts
	2009/2010	\$49,612.53	Pell Grant	6/30/2010	3/15/2012	624	1.00%	\$ 49,612.53	\$ 848.17	\$ -
	2010/2011	\$31,976.87	Pell Grant	6/30/2011	3/15/2012	259	1.00%	\$ 31,976.87	\$ 226.90	\$ -

Total Ineligible **\$81,589.40**

Totals
ACA Liability **\$ 1,075.07** **\$ -**

Campus-Based Amounts Spent (from FISAP, Part VI, Section B)

Federal FWS

Federal SEOG

Federal Perkins

Total C-B Spent

ACA Percentage

	Total	Federal Share
Pell	\$ 81,589.40	\$ 81,589.40
ACG	\$ -	\$ -
SMART	\$ -	\$ -
TEACH	\$ -	\$ -
FWS	\$ -	\$ -
FSEOG	\$ -	\$ -
Perkins	\$ -	\$ -
FWS-50% Match	\$ -	\$ -
FWS-No Match	\$ -	\$ -
FSEOG-No Match	\$ -	\$ -
Perkins-No Match	\$ -	\$ -

Total Campus-Based **\$ -** **\$ -**

Interest Breakdown

Pell Grants	\$ 1,075.07	\$ -
ACG	\$ -	\$ -
SMART	\$ -	\$ -
TEACH	\$ -	\$ -
FWS	\$ -	\$ -
FSEOG	\$ -	\$ -
Perkins	\$ -	\$ -
FWS-50% Match	\$ -	\$ -
FWS-No Match	\$ -	\$ -
FSEOG-No Match	\$ -	\$ -
Perkins-No Match	\$ -	\$ -

ACA Breakdown

FWS	<input type="text"/>
FSEOG	<input type="text"/>
Perkins	<input type="text"/>
FWS-50% Match	<input type="text"/>
FWS-No Match	<input type="text"/>
FSEOG-No Match	<input type="text"/>
Perkins-No Match	<input type="text"/>

Southern Technical College
OPE ID# 03903500
PRCN# 201140427638

Appendix K – Finding #5
2009/2010 Less Than ½ Time

Finding #5 - Underpayment/Overpayment
2009/2010 (Student Less Than 1/2 Time)

Student Name	SSN	Previous Enrollment Status 2009-10	Correct Enrollment Status 2009-10	Sub	Unsub
1	(b)(6); (b)(7)(C)	Full Time	Less Than 1/2 Time	\$0.00	\$0.00
2		Full Time	Less Than 1/2 Time	\$0.00	\$2,825.00
3		Full Time	Less Than 1/2 Time	\$3,884.00	\$6,000.00
4		Full Time	Less Than 1/2 Time	\$0.00	\$0.00
5		Full Time	Less Than 1/2 Time	\$0.00	\$0.00
6		Full Time	Less Than 1/2 Time	\$3,500.00	\$6,000.00
7		Full Time	Less Than 1/2 Time	\$3,500.00	\$6,000.00
8		Full Time	Less Than 1/2 Time	\$0.00	\$0.00
9		Full Time	Less Than 1/2 Time	\$8,000.00	\$12,000.00
10		Full Time	Less Than 1/2 Time	\$0.00	\$0.00
11		Full Time	Less Than 1/2 Time	\$3,500.00	\$6,000.00
				\$22,384.00	\$38,825.00

Southern Technical College
OPE ID# 03903500
PRCN# 201140427638

Appendix L – Finding #5
2010/2011 Less Than ½ Time

Finding #5 - Underpayment/Overpayment
2010/2011 (Student Less Than 1/2 Time)

Student Name	SSN	Previous Enrollment Status 2010-11	Correct Enrollment Status 2010-11	Sub	Unsub
1	(b)(6); (b)(7)(C)	Full Time	Less Than 1/2 Time	\$0.00	\$0.00
2		Full Time	Less Than 1/2 Time	\$0.00	\$0.00
3		Full Time	Less Than 1/2 Time	\$4,667.00	\$8,000.00
4		Full Time	Less Than 1/2 Time	\$0.00	\$0.00
5		Full Time	Less Than 1/2 Time	\$1,167.00	\$2,000.00
6		Full Time	Less Than 1/2 Time	\$0.00	\$0.00
7		Full Time	Less Than 1/2 Time	\$0.00	\$0.00
8		Full Time	Less Than 1/2 Time	\$4,500.00	\$5,676.00
9		Full Time	Less Than 1/2 Time	\$750.00	\$2,037.00
10		Full Time	Less Than 1/2 Time	\$3,500.00	\$6,000.00
11		Full Time	Less Than 1/2 Time	\$0.00	\$512.00
12		Full Time	Less Than 1/2 Time	\$0.00	\$0.00
13		Full Time	Less Than 1/2 Time	\$3,600.00	\$3,678.00
14		Full Time	Less Than 1/2 Time	\$3,750.00	\$2,611.00
15		Full Time	Less Than 1/2 Time	\$4,500.00	\$6,000.00
16		Full Time	Less Than 1/2 Time	\$3,833.00	\$5,884.00
17		Less Than 1/2 Time	Less Than 1/2 Time	\$3,088.00	\$4,000.00
18		Full Time	Less Than 1/2 Time	\$4,500.00	\$2,000.00
19		Full Time	Less Than 1/2 Time	\$4,500.00	\$5,800.00
20		Full Time	Less Than 1/2 Time	\$3,975.00	\$5,300.00
21		Full Time	Less Than 1/2 Time	\$2,333.00	\$0.00
22		Half Time	Less Than 1/2 Time	\$152.00	\$0.00
23		Full Time	Less Than 1/2 Time	\$600.00	\$800.00
24		Full Time	Less Than 1/2 Time	\$0.00	\$0.00
25		Full Time	Less Than 1/2 Time	\$6,833.00	\$10,000.00
26		Full Time	Less Than 1/2 Time	\$0.00	\$0.00
				\$56,248.00	\$70,298.00

Southern Technical College
OPE ID# 03903500
PRCN# 201140427638

Appendix M – Finding #5
Estimated Actual Loss Calculation

Appendix <M> Estimated Actual Loss Worksheet

Name of Institution Southern Technical College

1. Select Type	Two-Year
2. Select Award Year	2009-10
3. Enter Cohort Default Rate and/or Perkins Default Rate	13.3%

4. Enter Ineligible Principal	Ineligible Principal	Estimated Defaults
a. DL Subsidized	\$ 22,384.00	\$ 2,977.07
b. DL Unsubsidized	\$ 38,825.00	\$ 5,163.73
c. FFEL Subsidized		\$ -
d. FFEL Unsubsidized		\$ -
e. PLUS (DL, FFEL)		\$ -
f. Perkins		\$ -

Disb to Repayment	774
Repayment to Default	498
Repayment to PIF	1580

Estimated Actual Loss Interest and Special Allowance Breakdown	Disb to Repayment	
	DL Subsidized	\$ 2,164.31
	FFEL Sub	\$ -
	FFEL Unsub	\$ -
	Repayment to Default	
	FFEL Subsidized	\$ -
	FFEL Unsub	\$ -
	Repayment to PIF	
	FFEL Subsidized	\$ -
	FFEL Unsub	\$ -
	Perkins Interest	\$ -

Totals - Estimated Actual Loss By Program (Including Interest and Special Allowance)		
	DL Subsidized	\$ 5,141.38
	DL Unsubsidized	\$ 5,163.73
	FFEL Subsidized	\$ -
	FFEL Unsub	\$ -
	PLUS (DL, FFEL)	\$ -
	Perkins	\$ -

Total Estimated Actual Loss Liability **\$ 10,305.11**

The "Total Estimated Liability" shown on this worksheet is the Department's estimate of the "actual loss" to the Department that has or will result from the ineligible FFEL and Direct Loan program loans made by your institution. Estimated defaults are calculated using the most appropriate cohort default rate published by the Department.

The Department's loss for excess subsidies paid to lenders for ineligible loans is estimated by using the average number of days from:

- disbursement to entering repayment,
- repayment to default, and
- repayment to paid-in-full.

The averages used are from historical information supplied to the Department from all guarantee agencies.

Appendix <M> Estimated Actual Loss Worksheet

Name of Institution	Southern Technical College	
1. Select Type	Two-Year	
2. Select Award Year	2010-11	
3. Enter Cohort Default Rate and/or Perkins Default Rate	15.0%	
4. Enter Ineligible Principal	Ineligible Principal	Estimated Defaults
a. DL Subsidized	\$ 56,248.00	\$ 8,437.20
b. DL Unsubsidized	\$ 70,298.00	\$ 10,544.70
c. FFEL Subsidized		\$ -
d. FFEL Unsubsidized		\$ -
e. PLUS (DL, FFEL)		\$ -
f. Perkins		\$ -
Disb to Repayment	774	
Repayment to Default	498	
Repayment to PIF	1580	

Estimated Actual Loss Interest and Special Allowance Breakdown	<i>Disb to Repayment</i>	
	DL Subsidized	\$ 4,437.67
	FFEL Sub	\$ -
	FFEL Unsub	\$ -
	<i>Repayment to Default</i>	
	FFEL Subsidized	\$ -
	FFEL Unsub	\$ -
	<i>Repayment to PIF</i>	
	FFEL Subsidized	\$ -
	FFEL Unsub	\$ -
<i>Perkins Interest</i>	\$ -	

Totals - Estimated Actual Loss By Program (Including Interest and Special Allowance)	DL Subsidized	\$ 12,874.87
	DL Unsubsidized	\$ 10,544.70
	FFEL Subsidized	\$ -
	FFEL Unsub	\$ -
	PLUS (DL, FFEL)	\$ -
	Perkins	\$ -

Total Estimated Actual Loss Liability **\$ 23,419.57**

The "Total Estimated Liability" shown on this worksheet is the Department's estimate of the "actual loss" to the Department that has or will result from the ineligible FFEL and Direct Loan program loans made by your institution. Estimated defaults are calculated using the most appropriate cohort default rate published by the Department.

The Department's loss for excess subsidies paid to lenders for ineligible loans is estimated by using the average number of days from:

- disbursement to entering repayment,
- repayment to default, and
- repayment to paid-in-full.

The averages used are from historical information supplied to the Department from all guarantee agencies.

Final Program Review Determination
PRCN #: 201140427638

Appendix N

STC's Response
to the Program Review Report

June 11, 2012

Ms. Pat Gilbert
Atlanta Case Team
U. S. Department of Education/FSA
61 Forsyth Street, S.W Room 18T40
Atlanta, GA 30303-3104

RE: Program Review Report
OPE ID: 03903500
PRCN: 201140427638

Dear Ms. Gilbert:

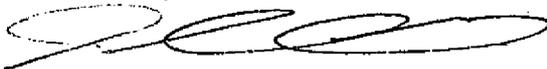
- Attached, please find the written responses to the findings included in the Program Review Report for Southern Technical College (OPE ID#03903500) dated March 15, 2012. In compliance with the instructions accompanying the Report, the College has formulated a narrative response to each finding, which is accompanied with support documentation when applicable.

In addition, the College performed two (2) substantial file reviews in response to Finding #1 and Finding #5. The College developed electronic spreadsheets containing the results of the reviews. Those spreadsheets along with supporting documentation were reviewed and audited by the IPA engaged for that purpose in accordance with the protocol submitted to and approved by the Department. The electronic spreadsheets, along with the auditor's report and documentation, are submitted as part of this response.

Please note that the supporting documentation for the file reviews is being submitted in electronic format. If you would prefer a hardcopy version of the documentation, the College is prepared to forward the printed documents to your attention.

The narrative responses should be complete and self-explanatory as submitted. However, should you have any questions, I can be contacted via telephone at (407) 323-4141 and/or via e-mail at jeuliano@southerntech.edu.

Sincerely,



John D. Euliano
President

Enclosures

Finding #1 Conflicting Information

Citation: *"The ability of an institution to coordinate the information it collects and to resolve discrepancies are critical elements in an evaluation of its administrative capability. Regulations require institutions to develop 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. 34 C.F.R. §668.16 (b)(3) and (f)*

Noncompliance: *"STC failed to resolve the discrepant information for the below students:*

Student #5: *The FAFSA signed on 11/6/2009 shows the student as single. Leave of Absence (LOA) paperwork dated 4/5/2010 and 11/22/2010 shows the student's reason for the LOA as "separation" with spouse.*

Student #16: *The student was not selected for verification; however, the student had a "C" code that needed to be resolved and the institution should have resolved the discrepant information. The enrollment application shows the student as married. The student reported single on the FAFSA and reported only his income. The household size was reported as 3.*

Student #22: *The student was not selected for verification. However, the student has a "C" code that needed to be resolved and the Institution should have resolved the discrepant information.*

- *Enrollment agreement and verification worksheet show "married" and the FAFSA reported "single".*
- *Incorrect status of "Head of Household" used on tax form 1040.*
- *"C" code for Selective Service was not resolved.*

Student #25: *The student was not selected for verification for the 2010/2011 award year but was selected for the 2009/2010 award year. The enrollment agreement shows the student as a single male and the student answered "no" to the question on enrollment agreement regarding are you a single parent. The student's FAFSA reported 2 in household size and on the verification worksheet for 2009/2010. The student also filed an amended tax return for 2008 changing the filing status as "single" rather than "head of household".*

Student #28: *The student was not selected for verification. However, the enrollment agreement shows the student as single male and not a single parent. The FAFSA shows 2 in household size and the student answered "yes" to the question regarding children you support.*

Required Action: *The program review was conducted due to several complaints from male students that they were being directed by officials at STC to report dependents when in fact they were not providing over 50% support. The discrepant information for the students identified above reveals questionable information reported on the FAFSA and the enrollment agreement.*

In response to this finding, STC must resolve the discrepant information for the students listed above and provide supporting documentation.

STC must also conduct a file review of all the students for the 2009/2010 and 2010/2011 award years to determine if corrections to the household size would result in a change to the Estimated Family Contribution (EFC) where there is conflicting information regarding household size and answers given by the student on either the FAFSA or institution's Enrollment Agreement.

Please include the results of the file review via diskette or in an electronic spreadsheet, containing the following information:

- 1. Student's name and Social Security Number (last 4 digits only)*
- 2. Award Year*
- 3. Original EFC*
- 4. Title IV aid disbursed*
- 5. Revised EFC*
- 6. Revised Title IV aid entitlement*
- 7. Ineligible award amounts and refunds due to the Title IV programs*

In lieu of performing a file review for the entire population (1504) for 2009/2010 and (1830) for the 2010/2011 award year to determine actual liabilities, STC has the option of performing this file review for only the remainder of the statistical sample not tested by the Department during the program review (308 for 2009/2010 320 for 2010/2011 remaining in the statistical samples). The results from this file review using the statistical sample will be used to project liabilities for the entire population (i.e., the average liability for the recipients in the statistical sample will be multiplied by the total population). This option is intended to reduce the burden on the institution of conducting the full file review.

If STC wishes to select this option, please use the attached statistical sample listings for award years 2009/2010 and 2010/2011 (Appendix B and C) for this finding. File reviews must be performed for all students on each statistical sample list except those included in Appendix A of this Program Review Report for the respective award year.

If STC elects to do the full file review, it is recommended that STC first review the remainder of the students in the statistical sample. At that point, STC may decide to accept liability projection instead of continuing with a full file review.

STC must engage an Independent Public Accountant (IPA) to test the file review completed by STC. The IPA must develop a set of procedures designed for testing the accuracy and completeness of the file review. The suggested procedures must be provided to Pat Gilbert within 30 days of the institution's receipt of this Program Review Report. Pat Gilbert will review the procedures, indicate if any changes are needed, and approve the procedures.

The IPA must apply the Agreed Upon Procedures to test the file review completed by STC, and prepare a report including any exceptions noted during its testing. The exceptions must be detailed and identified. Exceptions must be reported for all file review elements as specified in the finding requirement as presented in the Program Review Report. The IPA's report must be submitted with STC's response to this Program Review Report.

Payment instructions for any determined liability will be provided in the Final Program Review Determination Letter."

Narrative Response: STC has completed its review of the remaining students in the statistical samples for the 2009/2010 and 2010/2011 award years. The required electronic spreadsheet and the IPA test report is included with this response.

Regarding the students specifically referred to in the finding, the following information applies:

Student #5: All of the information provided by the student is consistent and indicates that the student is single. The LOA references in the student's academic file (as distinct from the financial aid file) were completed and placed in the file by the Registrar and reflect only the Registrar's perception of the situation. The use of the term "spouse" was done so at the discretion of the Registrar and is not official information provided by the student or by a third party/agency in reference to the student's marital status. In the absence of information provided by the student or by a third party/agency that would possess such information, there is no conflicting data in the student's file.

Student #16: The student provided a letter clarifying that he is single and never married. This statement resolves the discrepant information and results in no change to the student's EFC.

Student #22: The College agrees with the finding concerning this student and the discrepant information has not been resolved. However, the College has recalculated the student's entitlement by reducing the size of the household. This resulted in no change to the student's EFC and Title IV eligibility. This information is available in the electronic spreadsheet provided with this response.

Student #25: The student correctly completed the information on the enrollment agreement. He indicates that he is not a single parent, and that he is not married. At the time he completed the enrollment agreement and financial aid paperwork he was living with his fiancé and their child. The FAFSA was correctly completed, indicating 2 people in the household size (the student and his child), and leaving the fiancé out. Therefore, there was no change in the EFC.

Student #28: The College agrees with this finding and was unable to obtain clarification from the student. The College has not re-calculated the EFC because it is not possible to obtain the spouse's income information.

The Independent Public Accountant's report showed that there was a very small percentage of files with discrepant information. Out of the population of files examined, there was an error rate of only 0.34% of the files in the 2009/10 award year and 1.61% of the files in the 2010/11 award year. Based on the information above and the IPA report of the audited file review, the College believes that there is no material pattern of failing to resolve conflicting information which may become apparent during the packaging interview or subsequent to that activity. Therefore, the College respectfully requests that the Department make a final determination in this matter and that the finding be closed.

March 20, 2012

I, (b)(6); (b)(7)(C) am not married, nor have I ever been married.

Sincerely,

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

Finding #2 Incomplete Verification

Citation: *"If the Central Processing System (CPS) selects an application for verification, an institution must verify five major data elements (household size, number enrolled in college, adjusted gross income (AGI), and U.S. income tax paid by getting a copy of the signed U.S. income tax return. If a copy of the tax return is not available, the student must instead submit a copy of any IRS form that lists tax information and provides the information needed for verification. The form must be signed by the student unless the IRS sent the form directly to the school. 34 C.F.R. § 668.56 668.57"*

Noncompliance: *"Student #10 was selected for verification for the 2008/2009 award year. The FASFA shows the student as married. The student's filing status on the 2008 tax return shows "head of household", this is an incorrect filing status. The student was disbursed Pell funds in the amount of \$3154, subsidized loans of \$3500 and unsubsidized loans of \$5850. For the 2009/2010 award year, the student was not selected for verification. The student was disbursed Pell funds in the amount of \$5350, subsidized loans of \$4500 and unsubsidized loans of \$6000."*

Required Action: *"STC must obtain the proper IRS tax forms to complete the verification process. Failure to obtain the correct tax documents will result in a liability for the funds disbursed."*

Narrative Response: Southern Technical College concurs with the Finding and is unable to provide the required corrected tax document. The College awaits the Department's determination of any liability.

Finding #3 Dependency Override Not Properly Documented

Citation: *"The Higher Education Act allows an aid administrator to make dependency overrides on a case-by-case basis for students with unusual circumstances. If the administrator judges that an override is appropriate, he/she must document the unusual circumstances. However, none of the conditions listed below, singly or in conjunction, qualify as unusual circumstances or merit a dependency override: HEA § 480(d)(7)*

- *Parents refuse to contribute to the student's education*
- *Parents are unwilling to provide information on the application or for verification;*
- *Parents do not claim the student as a dependent for income tax purposes;*
- *Student demonstrates total self-sufficiency.*

If the financial aid administrators use professional judgment, the adjustment must be based on a student's individual circumstances and must be documented in the student's file. The documentation supporting the override must be adequate. There should be supplementary information supporting the finding of an unusual circumstance necessitating the dependency override. The school is held accountable for all professional judgments made and each decision must be fully documented.

So, although the Department will not second-guess the Financial Aid Administrator, there is a baseline of reasonableness that any professional judgment should meet, as well as, the requirement that the reason be adequately documented."

Noncompliance: *"STC used Professional Judgment to make student #19 (20 years old) an Independent student based on the statement that he provided more than 50% of his girlfriend's (20 years old) support for the year with only \$3,908 in income. Dependency Override can't be used to waive general student eligibility requirements or to circumvent the intent of the law or regulations."*

Required Action: *"The institution must provide a statement from the girlfriend regarding the amount of income she receives and the amount of support provided by the student on her behalf."*

Narrative Response: The College understands the citation relative to HEA §480(d)(7) and does not concur with the finding. The College determined that the student was independent based on the information provided to the College by the applicant and his girlfriend, which indicated that the applicant provided more than 50% of the support for the girlfriend. Based upon that information the College never considered the applicant to be dependent and, therefore, no override was required.

Because the College relied on confirmed information to determine that the applicant was an independent student, there was no need to over-ride the dependency status at the time the applicant was initially packaged. The College did not have to exercise professional judgment in determining the applicant's status and, therefore, is not in violation of HEA §480(d)(7). The College respectfully requests that this Finding be closed and that no further action be required of the College.

yes, (b)(6); (b)(7(C)) was supporting me more than 50%. Paying food, clothes, and rent. If you have any questions please

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

Finding #4 Academic Policy Stricter than Satisfactory Academic Policy (SAP)

Citation: "For purposes of determining student eligibility for assistance under a Title IV, HEA program,, establishes, publishes, and applies reasonable standards for measuring whether an otherwise eligible student is maintaining satisfactory progress in his/her educational program.

The Secretary considers an institution's standards to be reasonable if the standards are the same as or stricter than the institution's standards for a student enrolled in the same educational program who is not receiving assistant under a Title IV, HEA program. 34 C.F.R. § 668.16(e)"

Noncompliance: "STC academic policy is stricter than the Satisfactory Academic Policy (SAP) for students receiving Title IV funding.

Academic Policy – "Any student whose GPA falls below 2.0 may be placed on academic warning. However, students may not be to further action unless their academic achievement or credit completion rate falls below the satisfactory progress parameters outlined below. Students may also be placed on an academic warning if their class attendance falls below 60% for a given course, and all students seeking re-enrollment as a regular student following a suspension for academic progress will be placed on academic warning. A student on academic warning may be counseled and given assistance, if needed, to improve his/her GPA."

SAP Policy – "A student must meet the following standards of academic achievement and successful course completion while enrolled at STC."

Degree Students		Diploma Students	
Credits Attempted	Minimum GPA	Credits Attempted	Minimum GPA
0 – 23.9	1.00	0 – 23	1.00
24 – 47.9	1.25	24 – 42.0	1.50
48 – 71.9	1.50	43 and Up	2.00
72 – 89.9	1.75		
90 and Up	2.0		

"The following discrepancies were identified in relation to SAP testing.

Student #7: "The student's GPA for the end of Spring B was 1.00. The student reenrolled for Summer B and the term GPA was 1.20 with a cumulative GPA of 1.56, Fall B term GPA 0.25 and Cumulative GPA 1.15. The student continued enrollment for Winter B and received all F's and a cumulative GPA of 0.91."

Student #16: "The student was placed on Academic Warning for the Summer B term with a cumulative GPA of 1.77.

Student #19: "The student term GPA for Fall B was 0.67. The student re-enrolled for the Winter B term and received 2 F's and a WP receiving a GPA of 0 and a Cumulative GPA of 1.44."

Required Action: "STC must utilize the Academic Policy in place at the time of the review and conduct a file review" (This requirement was waived and STC is required to respond on the students noted in the non-compliance above. Our narrative addresses those students.)"

Narrative Response: The College believes the reviewers have a fundamental misunderstanding of our academic policy. The College does not publish and/or enforce multiple standards measuring whether a student is maintaining satisfactory progress in his or her educational program. All of the language associated with the satisfactory progress and academic policy standards is inclusive and pertains to all students enrolled at the College. The language referred to in Finding #4 as "Academic Policy" as distinct from "SAP Policy" is in fact a subsection of the satisfactory progress standards. It is not a stand-alone policy that is in effect for some, but not all, students. Rather, it is a statement regarding academic counseling that is available to students who have a GPA below 2.0. This counseling is purely informational in nature in that the College informs any student regardless of Title IV eligibility that a GPA of less than 2.0 is substandard and needs to be improved. It is important to note that there is no sanction imposed on a student for this status. To the contrary, the "academic" policy specifically and clearly states that no other action regarding the student's status with the College will be forthcoming unless the student's "...academic achievement or credit completion rate falls below the satisfactory progress parameters outlined..." Therefore, for any student whose GPA is below 2.0 but is otherwise meeting the SAP standards, no action is required on the part of the College. The College may perform counseling or other actions to help the student improve his or her GPA, but there is no requirement that either the student or the College take any particular steps.

With respect to each of the students noted as potential violations, the College provides the following information:

Student #7: This student was in continuous enrollment during four academic quarters. The review of the student's qualitative SAP at the end of each quarterly evaluation point is as follows:

Quarter Start	SAP Category	Cumulative Hours Attempted	Minimum Required Cumulative GPA	Actual Cumulative GPA	SAP Status	Incorrectly Disbursed Funds
Spring B – 5/4/2009	Full-time	18.0	1.00	1.00	SAP Met	None
Summer B – 8/3/2009	Full-time	33.0	1.25	1.56	SAP Met	None
Fall B – 10/26/2009	Full-time	51.0	1.50	1.15	Financial Aid Warning	None
Winter B – 2/1/2010	¼ Time	61.5	1.50	0.91	Student Dropped	None

This student was eligible for Title IV disbursements during all periods of enrollment, although the student had reached a point of financial aid warning after the third evaluation point. The student probably would have merited financial aid suspension at the end of the last quarter. However, the student dropped before that evaluation point was reached, so no further action by the College was necessitated.

Student #16: This student was enrolled full-time during each of the academic quarters he attended. The student is actively enrolled in the current quarter and is scheduled for full-time enrollment. The student's performance in the current quarter cannot be evaluated until all of the scheduled credits have been attempted. The review of the student's qualitative SAP during the four completed quarters is as follows:

Quarter Start	SAP Category	Cumulative Hours Attempted	Minimum Required Cumulative GPA	Actual Cumulative GPA	SAP Status	Incorrectly Disbursed Funds
Winter A – 2/10/2011	Full-time	18.0	1.00	1.67	In SAP	None
Spring B – 5/9/2011	Full-time	33.0	1.25	1.77	In SAP (The student was given an academic warning at this point, but not a financial aid warning)	None
Summer B – 8/8/2011	Full-time	46.5	1.25	2.03	In SAP	None
Fall B – 10/31/2011	Full-time	60.0	1.50	1.95	In Sap	None

The student was eligible for Title IV disbursements during all periods of enrollment to date. The student's status will be re-evaluated at the completion of the current quarter which is the next evaluation point.

Student #19: This student enrolled full-time in three consecutive quarters before dropping from the College. The review of the student's qualitative SAP is as follows:

Quarter Start	SAP Category	Cumulative Hours Attempted	Minimum Cumulative GPA	Actual Cumulative GPA	SAP Status	Incorrectly Disbursed Funds
Summer B – 8/2/2010	Full-time	15.0	1.00	3.30	In SAP	None
Fall B – 10/25/2010	Full-time	28.5	1.25	2.05	In SAP	None
Winter B – 2/7/2011	Full-time	46.5	1.25	1.44	In SAP	None

The student was in compliance with SAP requirements throughout the period of his enrollment. The student withdrew from the College during the final course of the third quarter while making satisfactory progress in accordance with the College's published standards.

Based upon the information above and documentation provided, Southern Technical College has no liability under this finding and is in compliance with the requirements of 34 C.F.R. § 668.16(e). Therefore, the College respectfully requests that Finding #4 be closed with no additional action required of the College.

Finally, the College is sensitive to the fact that the "academic" policy meant to provide a warning to the student concerning a GPA below 2.0 was apparently confused with the actual "SAP"

policy that affects a student's continued eligibility to receive Title IV funds. In order to avoid such confusion in the future, the College has eliminated the "academic" policy and it no longer appears in any of the College's publications.

Finding #5 Pell Underpayment/Overpayment

Citation: *"If an institution uses credit hours and academic terms to measure a student's progress, then the student's enrollment status (full-time, three-quarter time, half-time, or less than half-time) is used to calculate the amount of the student's Federal Pell Grant payment. A school may use its own standards for enrollment status, provided the standards meet the minimum requirements define in regulations. 34 C.F.R. § 690.63(c)"*

Noncompliance: *"The students identified below were overpaid due to their enrollment status:*

Student #3: *Enrolled for 6 hours (1/2 time) for Summer C. The student was disbursed Pell funds in the amount of \$1784 for full-time status. The student should have received \$891.00. The school returned \$189.52 on 11/1/2009 based on the student's withdrawal.*

Student #7: *Enrolled for 1.5 hours for Winter B. The student was disbursed \$1850 in Pell funds for full-time enrollment. The student should have only received \$1388.*

Student #12: *Enrolled for 9 hours for Summer C. The student was disbursed \$1850 in Pell funds for full-time enrollment. The student should have only received \$1388. The student was enrolled for Winter B and Winter C for 9 hours and received Pell funds in the amount of \$1850. The student should have only received \$1388*

Student #13: *Enrolled for 10.5 hours for Summer C. The Pell funds were not disbursed prior to the student withdrawing; however the school used the full-time Pell of \$1783 in the R2T4 calculation.*

Student #16: *Enrolled for 4.5 hours (less than 1/2 time) for Summer B. The student was disbursed \$1850 in Pell funds for full-time enrollment. The student should have only received \$463.*

Student #18: *Enrolled for 10.5 hours (3/4 time) for Winter C and was paid \$1850 in Pell funds for full-time enrollment. The student should have only received \$1388.*

Student #28: *Enrolled for Spring C term for 18 hours from 6/13/2011 – 9/1/2011. The student signed an appeal form showing he was recalled to attend Army training in Chaffee, Arkansas from 7/15/2011 – 7/30/2011. The attendance record shows the student was required to attend 64 hours and only attended 12 hours during that time period. The form was not processed due to excessive absences."*

Required Action: *"If a student's enrollment status changes from one term to the next, the institution must recalculate the Federal Pell Grant using the new enrollment status. If the student's enrollment status changes within a term, the institution may have to recalculate the student's award under certain circumstances.*

STC must conduct a file review of all students for the 2009/2010 and 2010/2011 award years and identify additional students who received ineligible Title IV Funds.

Please include the results of the file review via diskette in an electronic spreadsheet containing the following information:

- Student's Name and Social Security Number (last 4 digits)
- Award Year
- Federal Pell Grant Disbursed
- Previous Enrollment Status
- Recalculated Federal Pell Grant
- Correct Enrollment Status
- Over-Award

The institution must summarize the total amount of incorrectly disbursed Pell funds by award year. For each student in the file review, the institution must submit documentation (Account Card, Academic Transcript, and Attendance Records)

STC must engage an Independent Public Accountant (IPA) to test the file review completed by STC. The IPA must develop a set of procedures designed for testing the accuracy and completeness of the file review. The suggested procedures must be provided to Pat Gilbert within 30 days of the institution's receipt of this Program Review Report. Pat Gilbert will review the procedures, indicate if any changes are needed, and approve the procedures.

The IPA must apply the Agreed Upon Procedures to test the file review completed by STC, and prepare a report including any exceptions noted during its testing. The exceptions must be detailed and identified. Exceptions must be reported for all file review elements as specified in the finding requirement as presented in the Program Review Report. The IPA's report must be submitted with STC's response to this Program Review Report.

The institution must submit the data file in a .zip file encrypted with AES encryption (256-bit is preferred). One way to create such a file is with WinZip 11.0, available at www.winzip.com. The department uses WinZip and the instructions for creating encrypted files with this software are enclosed. Files created with other software are also acceptable, provided they are compatible with WinZip and encrypted with AES encryption, however, the Department cannot provide support for alternate software.

In addition, STC must also develop and submit with its response, procedures which will ensure that, in the future, Title IV funds are calculated using the correct enrollment status. The institution will be held liable for Title IV funds disbursed to student(s) without the appropriate documentation.

Repayment of liabilities will be addressed in the final program review determination letter."

Narrative Response: The College believes the Department was in error in four of the seven findings, and there was no net overpayment of Pell funds in one additional finding, as detailed below.

The College has a quarter-term programs with three modules per quarter. However, we have monthly class starts which results in the designations for the terms (Winter, Spring, etc.) on the student's academic transcripts not necessarily tracking neatly with the payment periods. Our

financial aid department is very careful to make disbursements based on payment periods that reflect the actual enrollment status of the student, but reviewing the status of the students based on academic transcripts alone may result in an inaccurate portrayal of the student status. The information below provides data based on the actual payment periods and disbursements for the students:

Student #3 – The school agrees.

Student #7 – The student actually enrolled in 10.5 hours in Winter B, not 1.5 hours. However, the school agrees that the student was not full-time. The Pell to be returned is \$462.50.

Student #12 –This student took one LOA, which resulted in an over award for one quarter of \$462.50. However, this was corrected and the student was under awarded \$462.50 in the final quarter resulting in a net over/under award of \$0.00.

The academic transcript for this student is being misinterpreted, which results in the appearance of the student being less than full-time twice. The student took only one leave of absence affecting his Pell disbursements. His actual attendance was as follows:

Quarter	Months of Attendance/Payment Period	Hours Attempted	Status
Quarter 1	March, April, May	16.5	Full-time
Quarter 2	June, July, August	15.0	Full-time
Quarter 3	September, October	9.0	½ time
Quarter 4	January, February, March	13.5	Full-time
Quarter 5	April, May, June	16.5	Full-time
Quarter 6	July, August September	15.0	Full-time
Quarter 7	October, November	12.0	Full-time

The school agrees that the student was over awarded Pell by \$462 in Quarter 3. However, we corrected this in the final payment period, resulting in no net over award.

Student #13 –This student did not receive any Pell disbursement for the payment period in question. In the student's final quarter, which is the one discussed in the program review report, the student dropped before receiving aid and no Pell funds were disbursed resulting in no over award.

Student #16 –This student was enrolled full-time during all periods during which funds were disbursed. His attendance and disbursements were as follows:

Quarter	Months of Attendance/Payment Period	Hours Attempted	Status	Pell Disbursed
Quarter 1	January, February, March	18.0	Full-time	1850
	April	0.0	Drop	0.0
Quarter 2	May, June, July	15.0	Full-time	1850
Quarter 3	August, September, October	13.5	Full-time	1850
Quarter 4	November, December, January	13.5	Full-time	1850
Quarter 5	February, March, April (scheduled)	15.0	Full-time	1850

There is no refund due.

Student #18 – The student has enrolled full-time since beginning classes. As mentioned above, the fact that we have monthly class starts can cause confusion when looking at academic transcripts. The three courses for Winter C appear on the transcript as two courses in Winter and one course in Spring. However, the months of attendance are March, April, and May showing consecutive attendance for that quarter. The student's full attendance is as follows:

Quarter	Months of Attendance/Payment Period	Hours Attempted	Status	Pell Disbursed
Quarter 1	September, October, November	18.0	Full-time	1850
Quarter 2	December, January, February	16.0	Full-time	1850
Quarter 3	March, April, May	15.0	Full-time	1850
Quarter 4	June, July, August	12.0	Full-time	1850
Quarter 5	September, October, November	15.0	Full-time	1850
Quarter 6	December, January, February	17.0	Full-time	1850

There is no over award.

Student #28 – This student enrolled full-time (18 hours) during Spring C and began attendance in each module. There was no issue of enrollment status in this case; rather, the issue is our attendance policy. Ordinarily, the Collège would excuse the days missed for military service. In this case, however, the student had previously missed sufficient unexcused days to make excusing the training days irrelevant. The fact that he missed some days of class in one course and ultimately failed that course does not alter the number of credits he actually attempted. There is no refund due.

The IPA found a 0.28% overpayment error rate for 2009/10 and an underpayment error rate of 0.13% for 2010/11, resulting in an overpayment of Pell funds for 2009/10 of \$14,104 and an underpayment of \$8,901 for 2010/11. Due to the extensive nature of the additional research involved, and the time consuming efforts to comply with the **"Required Action"** of this finding, the response will be provided as requested in digital file format a copy of which will accompany this program review response as required.

Finding #6 Return to Title IV R2T4 Calculation Errors

Citation: *"For students who withdraw from semester, trimester, or quarter programs, a school must perform the R2T4 calculation on a payment period basis. 34 C.F.R. § 668.22e(5)*

Also, the institutional charges used in the calculation generally have to reflect the charges for the payment period. Generally, the higher the institutional charges, the greater the amount of unearned aid that is to be returned by the school. An institution must prorate the charges for the period of enrollment to correspond to a payment period. 34 C.F.R. § 668.22(g)(1)(ii)"

Noncompliance: *"The R2T4 worksheets show the institution is checking payment period at the top of the form versus period of enrollment. However, the dates used in Step 2 "Percentage of Title IV Earned" actually use the period of enrollment.*

Student #3: *The student completed a Leave of Absence form on 9/28/2009 with no reason provided for the LOA. A student status form was completed on 10/23/2009 stating the student withdrew. Funds were returned to lender on November 1, 2009 but the reviewer could not find a R2T4 calculation in the file. The student was also overpaid Pell funds as discussed in Finding #3.*

Student #8: *The attendance records show the Last Date of Attendance (LDA) was 2/4/2010. The R2T4 was calculated using 2/12/2010 as the withdrawal date.*

Student #13: *The R2T4 calculation used the LDA as 11/3/2009. The attendance records show the student LDA was 9/3/2009. The calculation was performed only using the funds disbursed for the payment period and the percentage was based on the period of enrollment."*

Required Action: *"The use of payment period or period of enrollment is important for many aspects of the R2T4 calculation. To determine the treatment of Title IV funds on payment period basis, the student's Title IV program assistance to be used in the calculation is the aid that is disbursed or that could have been disbursed for the payment period. Also, institutional charges used in the calculation will only reflect charges for the payment period.*

STC must ensure that it is using the correct elements in R2T4 calculations as stated above. The R2T4 calculation must be performed for the students listed above."

Narrative Response:

Student #3: The College has performed a new R2T4 calculation, as required (see attached original and new R2T4 calculations). The variance between the original calculation and the current calculation is \$390.54. This additional amount has been refunded to the Pell program, as reflected on the student's ledger card.

Student #8: The College has performed a new R2T4 calculation, as required (see attached original and new R2T4 calculations). The variance between the original calculation and the current calculation is \$125.49. This additional amount has been refunded to the Pell program, as reflected on the student's ledger card.

Student #13: The College has performed a new R2T4 calculation, as required (see attached original and new R2T4 calculations). The variance between the original calculation and the

current calculation is \$1027.81. This additional amount has been refunded to the Pell program, as reflected on the student's ledger card.

For Finding #6, the College performed a review and revised R2T4 calculations for the three (3) students in question. The review indicated that the College accurately identified and used the correct beginning and end dates for each student. However, the College also found that the length of the payment period was slightly off in each case. The re-calculations for the students in the finding indicate that an additional total aggregate amount of **\$1543.84** should have been refunded. The College has submitted the additional refund amounts to the appropriate source of funds for each student (see refund documentation, attached). The College has also adjusted its electronic R2T4 calculation sheet to accurately and automatically identify the length of the payment period used in each R2T4 calculation.

Because the College has made the additional required refunds and has adjusted its procedure to ensure use of the correct payment period length and LDA, the College respectfully requests that Finding #6 be closed.

Finding #7 Ineligible Disbursement

Citation: "If a registered student withdraws or is expelled prior to the first day of classes of the period of enrollment, an institution must return any disbursed Title IV funds to the respective program. 34 C.F.R. § 668.21(a)"

If an institution disburses Title IV funds but the student does not begin attendance or the institution cannot document that the student ever began attendance, it must return any funds that were credited to the student's account, as well as the amount of any payments that the student made to the school. All schools must return funds disbursed to a student who failed to begin attendance. At a school that is required to take attendance, such as STC, it would be reasonable to expect the school to return disbursed funds immediately following the 14-day period the school is allowed to determine that a student is not attending class. 34 C.F.R. § 668.22(b)(1)

The Secretary considers excess cash to be any amount of Title IV, HEA program funds, other than Federal Perkins Loan Program funds, which an institution does not disburse to students or parents by the end of the third business day following the date the institution received those funds from the Secretary. 34 C.F.R. § 668.166"

Noncompliance: "STC disbursed and retained funds for student #16 who enrolled for less than ½ time for the period of the disbursement."

Required Action: "STC will be required to return the funds for Student #16 if documentation can't be provided that demonstrates the student was enrolled for at least ½ time."

Repayment of liabilities will be addressed in the final program review determination letter.

In addition, policies and procedures must be implemented to show how STC will prevent ineligible disbursements in the future. A copy of the procedures must be submitted with the institutions response to this finding."

Narrative Response: Student #16 was an active student when the program review was conducted and was scheduled to attempt 13.5 credits during the payment period. The student was enrolled in and actively attempting 4.5 credits at the time of the program review with an additional 9.0 credits scheduled for subsequent modules within the same term. The disbursement to the student was based on the full-time schedule.

Subsequent to the program review, the student did attempt the additional 9.0 credits for which he was scheduled. Because the student was scheduled as a full-time student and attempted sufficient credits to justify that status, the disbursement of Title IV funds was accurate and appropriate.

A summary of the student's attendance during the quarter is as follows:

Student	Constant	SSN:	4492	Start Date:	1/10/2011	LDA:	5/3/2012	
Quarter of Attendance	Quarterly Period	Quarter Begin Date	Quarter End Date	Course Code	Course Name	Credits Attempted	Credits Earned	Grade
3	Summer B	8/8/2011	10/27/2011	EIT125	Alternating Currents and Passive Devices	4.5	4.5	C
3	Summer B	8/8/2011	10/27/2011	EIT220	Advanced Residential Circuit Installation	4.5	4.5	B
3	Summer B	8/8/2011	10/27/2011	EIT230	Service Installation and Troubleshooting	4.5	4.5	B
TOTAL CREDITS =>						13.5	13.5	

Summer B was the student's third quarter of attendance and he both attempted and earned 13.5 quarter credits during that quarter, thus his status was "full-time". (Copy of student transcript is attached.)

Based upon the information and documentation provided, Southern Technical College has no liability under this finding and is in compliance with the requirements of 34 C.F.R. § 668.22(b)(1). Therefore, the College respectfully requests that Finding #7 be closed with no additional action required of the College.

Finding #8 Plus Loan Denial not Obtained

Citation: *"A dependent undergraduate student's eligibility for an additional unsubsidized Stafford loan amount is a dependent undergraduate student for whom the financial aid administrator determines and documents in the school's file, after review of the family financial information provided by the student and consideration of the student's debt burden, that the student's parents likely will be precluded by exceptional circumstances (e.g., denial of a PLUS loan to a parent based on adverse credit, the student's parent receives only public assistance or disability benefits, is incarcerated, or his or her whereabouts are unknown) from borrowing under the PLUS Program and the student's family is otherwise unable to provide the student's expected family contribution. A parent's refusal to borrow a PLUS loan does not constitute an exceptional circumstance. 34 C.F.R. §682.201(a)*

Dependent students whose parents are unable to borrow PLUS loans due to adverse credit or other exceptional circumstances may receive additional unsubsidized Stafford loans for the same amount as independent undergraduate student. The institution should examine the parent's ability to borrow a PLUS loan using an endorser who does not have an adverse credit history before certifying or origination additional unsubsidized loan amounts for the dependent student. Before certifying or origination a loan for increased loan amounts, you must document the basis of the dependent student's eligibility. The parent's denial of a PLUS loan based on adverse credit in one year does not support the dependent's eligibility in subsequent years."

Noncompliance: *"STC failed to obtain PLUS denial letters for the students listed in the finding.*

Required Action: *"STC Must obtain the missing parent's denial for the students listed above. The institution will be liable for all funds disbursed if documentation is not obtained. The institution must also implement procedures to prevent reoccurrence of this finding in future Program Review or Audits and provide a copy in response to this finding."*

Narrative Response: STC respectfully disagrees with the non-compliance section of this Finding, because each of these students was an independent student. The status of each of the students identified in the Finding is as follows:

Student #5 - This student's date of birth is clearly indicated on the enrollment agreement as 11/06/1981. At the time the student enrolled at Southern Technical College, the student was 28 years old. The student was an independent student for Title IV purposes and no PLUS denial letter was required prior to the student applying for an unsubsidized loan under the Federal Direct Loan Program. Please see the attached enrollment agreement and ISIR for the student's date of birth.

Student #14 - This student's date of birth is clearly indicated on the enrollment agreement as 10/09/1974. At the time the student enrolled at Southern Technical College, the student was 35 years old. The student was an independent student for Title IV purposes and no PLUS denial letter was required prior to the student applying for an unsubsidized loan under the Federal

Direct Loan Program. Please see the attached enrollment agreement and ISIR for the student's date of birth.

Student #18 - This student's date of birth is clearly indicated on the enrollment agreement as 10/03/1982. At the time the student enrolled at Southern Technical College, the student was 29 years old. The student was an independent student for Title IV purposes and no PLUS denial letter was required prior to the student applying for an unsubsidized loan under the Federal Direct Loan Program. Please see the attached enrollment agreement and ISIR for the student's date of birth.

Based upon the information and documentation provided, Southern Technical College has no liability under this finding and is in compliance with the requirements of 34 C.F.R. §682.201(a). Therefore, the College respectfully requests that Finding #8 be closed with no additional action required of the College.

Finding #9 Invalid High School Diploma

Citation: *"Citation: 34 C.F.R. §668.32(a)(2)(e)(1) states a student is eligible to receive Title IV, HEA program assistance if the student has a high school diploma or its recognized equivalent."*

Noncompliance: *"Two students appear to have invalid High School Diplomas."*

"Student #22's attestation stated he received a GED from Continental Academy located in Orlando, Florida in 2006."

"Student #25's attestation stated he received a High School Diploma from Colonial High School in Orlando, Florida in May 2003."

Required Action: *"The Institution must implement procedures to ensure the validity of high school diplomas before students are admitted and disbursed Title IV funds. A copy of the procedures must be submitted in response to this report."*

Narrative Response: Southern Technical College is aware of the requirements of 34 C.F.R. §668.32(a)(2)(e)(1) and trains its employees to comply with this regulation. Specifically, the College has developed a list of "Unacceptable High Schools" that identifies institutions whose "graduates" do not qualify for admission to the College. This list was first established in May 2010 based on a compilation from the California Board of Vocational Nursing and Psychiatric Technicians (BVNPT). Since that time, the College has added "unacceptable" high schools to the list when identified, along with the date the institution was added.

In order to implement use of the Unacceptable High School List, the College has established the following procedure:

PROCEDURE: The College shall train all admissions representatives to cross-reference the institution the student names on the high school attestation form with the institutions included on the published "Unacceptable High Schools" list. Any student that claims graduation from one of the "unacceptable" high schools on the list must be refused admission to the College by the admissions representative. In addition, the Associate Dean is required to review all admissions documentation including the attestation. If a student is erroneously accepted for admission without a proper attestation, the Associate Dean is required to reverse the student's acceptance as a student at the College.

The Deans and Associate Deans are also tasked with the responsibility of identifying additional high schools to be included on the "unacceptable" list. This occurs most frequently when an applicant indicates graduation from an unknown high school. The Deans/Associate Deans perform internet searches to determine the origin and nature of the high school, including but not limited to review of State-sponsored institutions, review of the high school's accredited status, and, when necessary, review of materials provided by the high school. The Dean/Associate Dean is responsible for reporting any suspect high schools to the Board of Control (BOC) for review and possible inclusion on the "unacceptable" list.

Finally, regarding the specific students in the Finding, the following information pertains:

Student #22 attests to attending and graduating from Continental Academy. Continental Academy is currently on the College's list of unacceptable high schools. However, the student applied to the College in January 2010 and Continental Academy was not added to the College's list until December 2010. The student's acceptance pre-dated the date on which the College determined that the Academy is not a proper high school. Students applying to the College since December 2010 who claim to be Continental Academy graduates have not been accepted for admissions.

Student #25 attests to attending and graduating from Colonial High School. Colonial High School is a well-known public High School of the Orange County Public School System (OCPSS) and has been servicing citizens of Orlando and Orange County since it was built in the 1950's and graduated its first class in 1960.

Because the College has established and enforces a procedure to prevent unqualified students from gaining admitted status, the College respectfully requests that Finding #9 be closed.



Unacceptable High School Proof of Graduation

A diploma from one of the below listed schools is not acceptable as evidence of "Proof of Graduation" from high school. Keep in mind that this list is not all-inclusive. There may be other high schools for which Proof of Graduation is unacceptable. Beware of any school that offers a high school diploma for a fee, based on limited course work, life experience or an "essay."

It is important that everyone is diligent in determining whether Proof of Graduation is from an acceptable high school to help maintain our standards at Southern Technical College.

The following is a list of high schools for which Proof of Graduation is unacceptable. Southern Technical College does not accept diplomas from the following schools:

<i>School Name</i>	<i>Effective Date</i>	<i>School Name</i>	<i>Effective Date</i>
A		Butler Christian Academy	5/1/2010
Adison High School	5/1/2010	Bundy Canyon Christian High School	5/1/2010
Advent Harvest Academy	5/1/2010	Bread of Life Christian Academy	5/1/2010
All American University	5/1/2010	C	
Alpha High School	5/1/2010	California Alternative High School	5/1/2010
American Academy High School	5/1/2010	California Teaching High School	5/1/2010
American Academy (Pinecrest)	5/1/2010	California Technical University High School	5/1/2010
American Continental Academy	5/1/2010	Capital High School (Heritage High School)	5/1/2010
America's National Christian Academy	5/1/2010	Castillo Christian School	5/1/2010
American World Wide Academy	5/1/2010	Centennial High School	5/1/2010
Anchor's Academy	5/1/2010	Century High School	5/1/2010
Aquila Wyatt Progressive High School	5/1/2010	Christian Academy & Tutoring Service (CATS)	5/1/2010
Arlington Church Academy	5/1/2010	Christian Vocational College	5/1/2010
Ashwood University	5/1/2010	Cleveland Christian Academy	5/1/2010
At-Home Academics	5/1/2010	Colorado State Academy	5/1/2010
Atlanta University High School	5/1/2010	Colorado State High School	5/1/2010
Atlantic Southeastern Academy	5/1/2010	Columbia North Online High School	5/1/2010
B		Companion Christian Academy	5/1/2010
Balboa High School	5/1/2010	Continental Academy	12/1/2010
Beach High School (CA)	5/1/2010	Corinthian Christian Center	5/1/2010
Belford High School (CA)	5/1/2010	Cornerstone Christian Correspondence School	5/1/2010
Belford University	5/1/2010	Cornerstone Christian School (GA) (FL)	5/1/2010
Benjamin Franklin High School	5/1/2010	Crossroads Christian School (GA) (FL)	5/1/2010
Bluebonnet Private School	5/1/2010		

<i>School Name</i>	<i>Effective Date</i>	<i>School Name</i>	<i>Effective Date</i>
D		Metro High School	5/1/2010
E		MLCC Ministries	5/1/2010
East End Home Study	5/1/2010	Midwest High School	5/1/2010
Einstein Academy Charter School	5/1/2010	Midwest Theological Institute	5/1/2010
Ellenwood Academy	5/1/2010	Midwest Adult Academy	5/1/2010
Enterprise Online High School	5/1/2010	N	
Excel High School	5/1/2010	Nation High School	5/1/2010
F		Nationwide Academy High School	5/1/2010
Faith Christian Academy High School	5/1/2010	New Beginnings Christian Academy	5/1/2010
Faulkenberg Academy	5/1/2010	New Image Christian Academy	5/1/2010
Farington University	5/1/2010	New Spiritual Foundation Christian Academy	5/1/2010
Farington High School	5/1/2010	North Central High School	5/1/2010
Finishhighschool.com	5/1/2010	North Star Christian High School	5/1/2010
First Coast Academy	5/1/2010	O	
Frank Fields Educational School	5/1/2010	Oak Brook Baptist School	5/1/2010
Franklin Online High School	5/1/2010	P	
Front Range Academy	5/1/2010	Parkview Baptist school (TX)	5/1/2010
G		Q	
GED Associates	5/1/2010	Questar Academy	5/1/2010
Good News Christian High School	5/1/2010	R	
Great Lakes Academy (Online)	5/1/2010	Rochville University	5/1/2010
Greenberg Christian Academy	5/1/2010	S	
H		Sequoai High School (CA)	5/1/2010
Heritage High School Online	5/1/2010	Senford High School	5/1/2010
Heritage West High School	5/1/2010	Sierra Summit Charter School	5/1/2010
Home Study Careers	5/1/2010	Stratford Career Institute	5/1/2010
I		St. Augustine Old Catholic High School	5/1/2010
J		St. James Academy (FL)	5/1/2010
Jefferson High School Online	5/1/2010	St. Michaels Learning Academy(TX)	5/1/2010
John Adams Virtual Academy	5/1/2010	Stepping Stones High School	8/10/2011
K		Stone Coast Academy	5/1/2010
L		Sunrise Private High School	5/1/2010
LaSalle High School Online	5/1/2010	Sunshine High School	12/1/2010
Lighthouse Academy Online	5/1/2010	T	
Lion of Judah Academy	5/1/2010	Titan High School	5/1/2010
Lions Academy	5/1/2010	U	
Lincoln Online High School	5/1/2010	United Christian School (TX)	5/1/2010
Lone Star State Learning Academy	5/1/2010	Universal Bible College	5/1/2010
Longhorn Private School	5/1/2010	Universal Christian Academy	5/1/2010
Long Island Home Study (GED)	5/1/2010	University Park Academy (TX)	5/1/2010
M		V	
Macedonia High School (TX)	5/1/2010	Vencer High School Online	5/1/2010
Madison Falls High School	5/1/2010	W	
Victory High School	5/1/2010	Wisconsin University High School	5/1/2010
Marion Williams Bible Institute	5/1/2010	X	
Marque Learning Center	5/1/2010	Y	
Marquette Adult Education	5/1/2010	Z	
Masters High School (TX)	5/1/2010		

Revised 8/2011

Finding #10

Award Letter Not Updated

Citation: *"An institution must provide adequate financial aid counseling to eligible students who apply for Title IV assistance. Specifically, the institution must notify the student of the amount he/she can expect to receive, and how and when those funds will be disbursed 34 C.F.R. § 668.16(h)"*

Noncompliance: *"STC Failed to properly document the awarding of the Federal Supplemental Educational Opportunity Grant (FSEOG) on the award letters for all students in the review sample."*

Required Action: *"The institution must develop a policy with procedures to ensure that each student is counseled and notified of the amount of Title IV aid he/she can expect to receive, and how and when that amount will be paid. A copy of this newly developed policy and procedures must be submitted to this office in response to this finding."*

Narrative Response: The College agrees with this finding and has developed the following policy and procedure to assure future compliance.

Policy: The College will provide each student in writing with a statement concerning the types and amounts of aid which have been awarded to the student. Any change to a student's initial package requires that a revised written statement be provided to the student in a timely manner.

Procedure: The FAO is responsible for packaging each student in a complete and comprehensive manner at the time of the financial aid interview based on the available relevant information provided by the student. The resulting package should include all fund sources (Pell, FDL, FSEOG, student payment plan, etc.) available to the student along with the amounts for which the student qualifies and when and how those funds will be disbursed. Once the package is complete, the FAO prints an award letter from Campus Vue containing the same information, which is provided to the student.

If at any future time, the student's proposed financial aid package changes as a result of verification, change in enrollment status, resolution of conflicting information, or any other circumstance that alters the student's eligibility, the FAO must re-counsel the student to explain changes in the student's package. When any change in the student's funding package occurs, the FAO must generate from Campus Vue and provide to the student a new award letter reflecting those changes.

Because the College has developed and implemented its new policy and procedure concerning updating and distributing the award letter, the College respectfully requests that Finding #10 be closed and no further action required of the College in this regard.

Finding #11

FSEOG Minimum Award Requirement Not Met

Citation: *"An institution may award an FSEOG in an amount it determines a student needs to continue his/her studies for an academic year. However, a Federal SEOG may not be awarded for a full academic in an amount that is less than \$100 or more than \$4,000. For a student enrolled for less than a full academic year, the minimum allowable Federal SEOG award may be proportionately reduced."*

Noncompliance: *"The institution is awarding students FSEOG funds in amounts less than the minimum amount of \$100."*

Required Action: *"In response to this finding, the institution must develop procedures to ensure that students receive FSEOG awards that are within the minimum allowable amounts. A copy of these procedures must be submitted in response to this finding."*

Narrative Response: The College has developed the following FSEOG procedure that ensures that students receive FSEOG awards that are within the minimum allowable amounts:

Federal Supplemental Educational Opportunity Grants (FSEOG)

The following policies shall be relied upon in the administration of Southern Technical College's Federal Supplemental Educational Opportunity Grants (FSEOG) program:

1. The Financial Aid Director will apply annually for FSEOG funds in the manner and at the time specified by the U.S. Department of Education;
2. The Financial Aid Director will notify the President that funds have been applied for and, when appropriate, that the U.S. Department of Education has allocated funds to the College;
3. The Financial Aid Director in conjunction with the campus Financial Aid Officer and Registrar shall determine the amount of grants to be awarded to eligible students prior to the beginning of each award year. All awards will be in the same amount for each student and shall be a minimum of **\$100.00 per recipient**;
4. The first selection group will be those students determined through the needs analysis process to have a zero expected family contribution (000 EFC) who are receiving Pell Grants and who were enrolled in degree programs offered by the College on or after July 1 of each year;
5. In the event that there is an insufficient number of students in the first selection group to account for all available FSEOG funds, the Director of Financial Aid, in consultation with the Registrar and the campus Financial Aid Officer, may either increase the amount awarded to all recipients of grants during the award year in equal amounts or determine a second selection group with higher eligibility EFC to increase the number of recipients for the award year. Any changes to the grant amount or eligibility EFC that occur during the award year must be in writing and approved by the Sr. Vice President;

6. Grants shall be awarded to otherwise eligible students on a "first come-first served" basis starting at the beginning of each award period and lasting until all available funds have been awarded;
7. The Financial Aid Director shall notify the College's third-party financial aid servicer of the names of students who have been awarded grants and the amount of each grant;
8. The third-party servicer will schedule and disburse FSEOG funds to coincide with disbursement of PELL grant funds;
9. The Registrar, Financial Aid Officer, and Business manager shall receive, process and post FSEOG funds in a manner identical to receiving, processing, and posting PELL grant funds;
10. The third-party servicer will provide monthly reports reflecting FSEOG funds awarded and available;
11. The Financial Aid Director shall maintain a master list student names and amounts awarded and shall reconcile this list to the third-party servicer's list; and
12. The Financial Aid Director shall provide the Sr. Vice President a copy of the reconciled master list during the first week of each start period.

Because the College has developed and implemented its new policy and procedure concerning making at least the minimum award of funds, the College respectfully requests that Finding #11 be closed and no further action required of the College in this regard.

Finding #12

Credit Balance Authorization Needs Revision

Citation: *"In obtaining the students or parent's authorization to perform an activity described in paragraph (b)(1) of this section, an institution may not require or coerce the student or parent to provide that authorization, must allow the student or parent to cancel or modify that authorization at any time and must clearly explain how it will carry out that activity. 34 CFR §668.164(e)*

If current year Title IV funds credited to the student's account exceed and the total amount of current year tuition, fees, and other authorized charges, the institution must pay the resulting credit balance directly to the student or parent as soon as possible, but not later than 14 days after the credit balance occurred if it occurred after the first day of classes. If the credit balance occurred on or before the first day of class, it must be returned no later than 14 days after the first day of class.

An institution may secure a student's written permission to retain credit balance funds for budgeting purposes, but it must be optional. The student must not be coerced into providing the school permission to retain funds and the student must be informed of his or her right to rescind the authorization at any time. If the institution holds excess student funds, it must –

- *Identify the amount of funds it holds for each student or parent in a subsidiary ledger account designed for that purpose;*
- *Maintain, at all times, cash in its bank account in an amount at least equal to the amount of funds the institution holds for the student; and*
- *Notwithstanding any authorization obtained by the institution, pay any remaining balance on loan funds by the end of the loan period and any other remaining Title IV funds by the end of the last payment period in the award year for which they were awarded.*

If a school has lost contact with a student who is due a credit balance, it must use all reasonable means to locate him or her. If it still cannot find the student, the school must return the credit balance to the lender to reduce the borrower's loan balance, or, to the appropriate Title IV program(s)."

Noncompliance: *"STC's procedure for obtaining a student's authorization to retain Title IV credit balance funds does not appear to be optional for students.*

Students are required to sign a form called "Voluntary Authorization Agreement" which states 'I authorize Southern Technical College to initiate credit entries for financial aid amounts, debit entries and any adjustment to my account.'

'If a credit balance appears on my account, I authorize the institution to determine if the credit is in excess of my tuition, fees and any other applicable charges for the completion of the current loan period or award year as applicable. If this is the case and there is a true excess, I authorize the school to hold these funds until such time as I have earned the aid based on the Federal Return to Title IV Funds Policy.'

The only preference the student can select is 'I authorize the school to refund any credit balance to my lender in order to reduce my overall student loan debt.'"

Required Action: *"We also remind the institution that Title IV aid credited to a student's account may be used to satisfy current year charges (per 34 CFR § 668.164[d]). If a student's aid package*

includes a Title IV loan, the year is the loan period. If the student does not have a loan, the year is the award year. The maximum amount of prior year charges that may be paid with current year funds is \$200.

STC is required to revise its procedures for the payment of and authorization to retain student credit balance funds. The student must be given the option of having their credit balances returned to them within 14 days as stated in the regulations. Returning loan funds on behalf of the student is not part of the cost of attendance. Further, the student must not be coerced into signing the credit balance authorization form as stated in the Institution's policy as a required document. The policy must be in compliance with the above requirements and it must take effect immediately.

Please provide a copy of your revised policy and authorization form in response to this finding.

Narrative Response: In response to this finding, the College has revised its policy on authorizations and holding credit balances. The new policy is as follows:

Policy:

When Title IV funds awarded to a student result in a credit balance in the student's account, the College will disburse funds in the amount of the credit balance to the student via written check. The disbursement will occur within 14 days of either the first day of classes in the disbursement period or the date the Title IV funds are received by the College, whichever is later.

The College has ceased holding credit balances and follows the 14-day rule with all credit balances that resulted from the awarding of FSA funds. Since the College has ceased to hold credit balance funds, the College has removed the Voluntary Authorization form from the packet of financial aid interview materials and there is no expectation that students will sign such a form in the future.

Because the College has re-written its policy concerning handling excess FSA funds and because the College no longer includes a Voluntary Authorization form that students are expected to sign, the College respectfully requests that Finding #12 be closed with no further action required on the part of the College.

Finding #13**Policy and Procedures Manual Missing**

Citation: *"To participate in the Federal Student Aid (FSA) programs, a school must demonstrate that it is administratively capable of providing the education it promises and properly managing the FSA programs. 34 CFR § 668.16"*

Noncompliance: *"STC does not currently have a policies and procedures manual that describes how all the various functions described in 34 CFR § 668.16 are being properly administered."*

Required Action: *"While the regulations do not specifically state that an Institution must have a policies and procedures manual, it does however state that an Institution must demonstrate that it is capable of adequately administering the program under each of the standards established in this section.*

The Financial Aid Director stated the manual was still in the developing stages. In response to this finding, STC must provide a copy of the manual."

Narrative Response: A copy of the College's policies and procedures manual is attached. Having complied with the required action for this finding, the College respectfully requests that the finding be closed with no additional action required.



SALMON SIMS THOMAS

Accountants and Consultants

June 5, 2012

U.S. Department of Education, Case Management
Atlanta, Georgia

RE: Southern Technical College
OPEID # 03903500

In The follow-up to the Program Review 201140427638, for the award years 2009/2010 and 2010/2011, we tested 234 out of the sample population of 596 of Southern Technical College's student files documentation in response to Finding 1 – Conflicting Information and Finding 2 – Pell Underpayments/Overpayments for a 95% confidence level with a 5% margin of error.

Our examination was made in accordance with *Government Auditing Standards*, issued by the Comptroller General of the United States; attestation standards established by the American Institute of Certified Public Accountants; and the Audit (Attestation) Guide, Audits/attestation Engagements of Federal Student Financial Assistance Programs, issued by the U.S. Department of Education, Office of the Inspector General, as updated.

Finding No. 1 – Conflicting Information

In the 2009/2010 and 2010/2011 award years the Institution had information in the student file that conflicted with that from the ISIR. This resulted in a .34% error rate, within the sample, in the 2009/2010 award year and a 1.61% in the 2010/2011 award year. When applied to the entire population it resulted in a liability of \$5,167 in 2009/2010 and \$27,340 in 2010/2011 to the Federal Pell Grant Program.

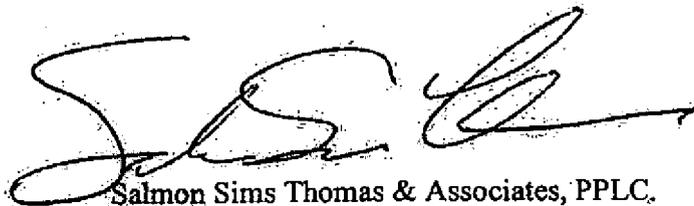
Finding No. 2 – Pell Underpayments/Overpayments

In the 2009/2010 and 2010/2011 the Institution made overpayments and underpayments to the Federal Pell Grant Program. This resulted in a .28% overpayment error rate, within the sample, in the 2009/2010 award year and a .13% underpayments error rate in the 2010/2011 award year. When applied to the entire population it resulted in a liability of \$14,104 in 2009/2010 and (\$8,901) in 2010/2011 to the Federal Pell Grant Program.

U.S. Department of Education, Case Management
Atlanta, Georgia
Page Two

In our opinion, Southern Technical Institute has complied with the requirements of the above mentioned findings. We were not engaged to, and did not conduct an audit, the objective of which would be the expression of an opinion, on the accounting record. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of Southern Technical Institute and Department of Education, and is not intended to be and should not be used by anyone other than those specified parties.

A handwritten signature in black ink, appearing to read 'SST', is written over the printed name of the firm.

Salmon Sims Thomas & Associates, PPLC.

Final Program Review Determination
PRCN #: 201140427638

Appendix O
Program Review Report



FILE COPY

March 15, 2012

Mr. John Euliano, President
Southern Technical College
1485 Florida Mall Avenue
Orlando, FL 32809-0000

UPS
Tracking #1Z A54 67Y 01 9126 1827

RE: Program Review Report
OPE ID: 03903500
PRCN: 201140427638

Dear Mr. Euliano:

From August 29, 2011 through September 2, 2011, Pat Gilbert, Sherry Blackman and Angelique James as representatives of the U.S. Department of Education conducted a review of Southern Technical College's (STC) 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 STC. The response should include a brief, written narrative for each finding that clearly states STC's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, STC 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.

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, School Participation Team - Atlanta
61 Forsyth Street, S.W., Room 18T40, Atlanta, GA 30303-3104
www.FederalStudentAid.ed.gov

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 STC 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 Pat Gilbert of this office within 60 calendar days of receipt of this letter.

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 Pat Gilbert at (404) 974-9292 or Patricia.Gilbert@ed.gov.

Sincerely,

(b)(6)

Chris Miller
Team Leader

cc: Mr. Richard Bennett, Financial Aid Administrator

Enclosure:
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

Southern Technical College



START HERE
GO FURTHER
FEDERAL STUDENT AID

OPE ID# 03903500
PRCN# 201140427638

Prepared by
U.S. Department of Education
Federal Student Aid
School Participation Team - Atlanta

Program Review Report

March 15, 2012

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Appendix A – Student Sample

Appendix B – 2009/2010 Statistical Sample

Appendix C – 2010/2010 Statistical Sample

Southern Technical College
OPE ID# 03903500
PRCN# 201140427638
Page 2 of 21

A. Institutional Information

Southern Technical College
1485 Florida Mall Avenue
Orlando, FL 32809-0000

Type: Proprietary

Highest Level of Offering: Associate's Degree

Accrediting Agency: Accrediting Council for Independent Colleges and Schools

Current Student Enrollment: 1134 (2010/2011)

% of Students Receiving Title IV: 99.38% (2010/2011)

Title IV Participation: Grants Administrative and Payment System (G5):

	<u>2009/2010</u>	<u>2010/2011</u>
Federal Pell Grant	\$5,334,008	\$ 7,180,094
Federal Supplemental Educational Opportunity Grant (SEOG)	\$ 19,779	\$ 25,000
Academic Competitiveness Grant (ACG)	\$ 11,868	\$ 10,015
Federal Direct Loan (DL)	\$7,131,380	\$12,264,937

Default Rate FFEL/DL: 2009 - 13.3%
2008 - 3.2%
2007 - 9.6%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Southern Technical College (STC) from August 29, 2011 to September 2, 2011. The review was conducted by Pat Gilbert, Sherry Blackman and Angelique James.

The focus of the review was to determine STC'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 STC'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 2009/2010 and 2010/2011 (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.

Disclaimer:

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

Finding #1: Conflicting Information

Citation: The ability of an institution to coordinate the information it collects and to resolve discrepancies are critical elements in an evaluation of its administrative capability. Regulations require institutions to develop 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. *34 C.F.R. § 668.16(b)(3) and (f)*

Noncompliance: STC failed to resolve the discrepant information for the below students:

Student #5: The FAFSA signed on 11/6/2009 shows the student as single. Leave of Absence (LOA) paperwork dated 4/5/2010 and 11/22/2010 shows the student reason for the LOA as "separation" with spouse.

Student #16: The student was not selected for verification; however the student had a "C" code that needed to be resolved and the Institution should have resolved all the discrepant information. The enrollment application shows the student as married. The student reported single on the FAFSA and reported only his income. The Household size was reported as 3.

Student #22: The student was not selected for verification. However, the student has a "C" code that needed to be resolved and the Institution should have resolved all the discrepant information.

- Enrollment Agreement and Verification Worksheet show "married" and the FAFSA reported "single".
- Incorrect status of "Head of Household" used on Tax Form 1040
- "C" code for Selective Service was not resolved

Student #25: The student was not selected for verification for the 2010/2011 award year but was selected for the 2009/2010 award year. The enrollment agreement shows the student as a single male and the student answered "no" to the question on enrollment agreement regarding are you a single parent. The student FAFSA reported 2 in household size and on the verification worksheet for 2009/2010. The student also filed an amended tax return for 2008 changing the filing status as "single" rather than "head of household".

Student #28: The student was not selected for verification. However, the enrollment agreement shows the student as a single male and not a single parent. The FAFSA shows 2 in household size and the student answered "yes" to the question regarding children you support.

Required Action: The program review was conducted due to several complaints from male students that they were being directed by officials at STC to report dependents when in fact they were not providing over 50% support. The discrepant information for the students identified above reveals questionable information reported on the FAFSA and the Enrollment Agreement.

In response to this finding, STC must resolve the discrepant information for the students listed above and provide supporting documentation.

STC must also conduct a file review of all the students for the 2009/2010 and 2010/2011 award years to determine if corrections to the household size would result in a change to the Estimated Family Contribution (EFC) where there is conflicting information regarding household size and answers given by students on either the FAFSA or Institution's enrollment agreement.

Please include the results of the file review via diskette or in an electronic spreadsheet, containing the following information:

1. Student's Name and Social Security Number (last 4 digits only)
2. Award Year
3. Original EFC
4. Title IV aid disbursed
5. Revised EFC
6. Revised Title aid Entitlement
7. Ineligible award amounts and refunds due to the Title IV programs

In lieu of performing a file review for the entire population (1504) for 2009/2010 and (1830) for the 2010/2011 award year to determine actual liabilities, STC has the option of performing this file review for only the remainder of the statistical sample not tested by the Department during the program review (308 for 2009/2010 and 320 for 2010/2010 remaining in the statistical samples). The results from this file review using the statistical sample will be used to project liabilities for the entire population (i.e., the average liability for the recipients in the statistical sample will be multiplied by the total population). This option is intended to reduce the burden on the institution of conducting a full file review.

If STC wishes to select this option, please use the attached statistical sample listings for award years 2009/2010 and 2010/2011 (Appendix B and C) for this finding. File reviews must be performed for all students on each statistical sample listing except those included in Appendix A of this Program Review Report for the respective award year.

If STC elects to do the full file review; it is recommended that STC first review the remainder of the students in the statistical sample. At that point, STC may decide to accept liability projection instead of continuing with a full file review.

STC must engage an Independent Public Accountant (IPA) to test the file review completed by STC. The IPA must develop a set of procedures designed for testing the accuracy and completeness of the file review. The suggested procedures must be provided to Pat Gilbert within 30 days of the institution's receipt of this Program Review Report. Pat Gilbert will review the procedures, indicate if any changes are needed, and approve the procedures.

The IPA must apply the Agreed Upon Procedures to test the file review completed by STC, and prepare a report including any exceptions noted during its testing. The exceptions must be detailed and identified. Exceptions must be reported for all file review elements as specified in the finding requirement as presented in the Program Review Report. The IPA's report must be submitted with STC's response to this Program Review Report.

Payment instructions for any determined liability will be provided in the Final Program Review Determination Letter.

Finding #2: Incomplete Verification

Citation: If the Central Processing System (CPS) selects an application for verification, an institution must verify five major data elements (household size, number enrolled in college, adjusted gross income (AGI), U.S. income tax paid, and certain untaxed income and benefits). An institution can verify AGI and U.S. income tax paid by getting a copy of the signed U.S. income tax return. If a copy of the tax return is not available, the student must instead submit a copy of any IRS form that lists tax information and provides the information needed for verification. The form must be signed by the student unless the IRS sent the form directly to the school. *34 C.F.R. § 668.56, 668.57*

Noncompliance: Student #10 was selected for verification for the 2008/2009 award year. The FAFSA shows the student as married. The student's filing status on the 2008 tax return shows "head of household", this is an incorrect filing status. The student was disbursed Pell funds in the amount of \$3154, subsidized loans of \$3500 and unsubsidized loans of \$5850. For the 2009/2010 award year, the student was not selected for verification. However, the tax return only shows 3 exemptions but the household size is 6 on the FAFSA. The student was disbursed Pell funds in the amount of \$5350, subsidized loans of \$4500 and unsubsidized loans of \$6000.

Required Action: STC must obtain the proper IRS tax forms to complete the verification process. Failure to obtain the correct tax documents will result in a liability for the funds disbursed.

Finding #3: Dependency Override Not Properly Documented

Citation: The Higher Education Act allows an aid administrator to make dependency overrides on a case-by-case basis for students with unusual circumstances. If the administrator judges that an override is appropriate, he/she must document the unusual circumstances. However, none of the conditions listed below, singly or in conjunction, qualify as unusual circumstances or merit a dependency override: *HEA Sec. 480(d)(7)*

- Parents refuse to contribute to the student's education
- Parents are unwilling to provide information on the application or for verification;
- Parents do not claim the student as dependent for income tax purposes;
- Student demonstrates total self-sufficiency.

If the financial aid administrators use professional judgment, the adjustment must be based on a student's individual circumstances and must be documented in the student's file. The documentation supporting the override must be adequate. There should be supplementary information supporting the finding of an unusual circumstance necessitating the dependency override. The school is held accountable for all professional judgments made and each decision must be fully documented.

So, although the Department will not second-guess the Financial Aid Administrator, there is a baseline of reasonableness that any professional judgment adjustment should meet, as well as, the requirement that the reason be adequately documented.

Noncompliance: STC used Professional Judgment to make student #19 (20 years old) an Independent student based on the statement that he provided more than 50% of his girlfriend's (20 years old) support for the year with only \$3,908 in income. Dependency Override can't be used to waive general student eligibility requirements or to circumvent the intent of the law or regulations.

Required Action: The Institution must provide a statement from the girlfriend regarding the amount of income she receives and the amount of support provided by the student on her behalf.

Payment instructions for any determined liability will be provided in the Final Program Review Determination Letter.

Finding #4: Academic Policy Stricter than Satisfactory Academic Policy

Citation: For purposes of determining student eligibility for assistance under a Title IV, HEA program, establishes, publishes, and applies reasonable standards for measuring whether an otherwise eligible student is maintaining satisfactory progress in his/her educational program.

The Secretary considers an institution's standards to be reasonable if the standards are the same as or stricter than the institution's standards for a student enrolled in the same educational program who is not receiving assistance under a Title IV, HEA program.
34 C.F.R. § 668.16(e)

Noncompliance: STC academic policy is stricter than the Satisfactory Academic Policy (SAP) for students receiving Title IV funding.

Academic Policy – Any student whose GPA falls below 2.0 may be placed on academic warning. However, students may not be subject to further action unless their academic achievement or credit completion rate falls below the satisfactory progress parameters outlined below. Student may also be placed on an academic warning if their class attendance falls below 60% for a given course, and all students seeking re-enrollment as a regular student following a suspension for academic progress will be placed on academic warning. A student on academic warning may be counseled and given assistance, if needed, to improve his/her GPA.

SAP Policy – A student must meet the following minimum standards of academic achievement and successful course completion while enrolled at STC.

Degree Students		Diploma Students	
Credits Attempted	Minimum GPA	Credits Attempted	Minimum GPA
0 – 23.9	1.00	0 – 23	1.00
24 – 47.9	1.25	24 – 42.0	1.50
48 – 71.9	1.50	43 and Up	2.00
72 – 89.9	1.75		
90 and Up	2.00		

The following discrepancies were identified in relation to SAP testing.

Student #7: The student's GPA for the end of Spring B was 1.00. The student reenrolled for Summer B and the term GPA was 1.20 with a cumulative GPA of 1.56. Fall B term GPA 0.25 and Cumulative GPA 1.15. The student continued enrollment for Winter B and received all F's and cumulative GPA of 0.91.

Student #16: The student was placed on Academic Warning for the Summer B term with a cumulative GPA of 1.77.

Student #19: The student Term GPA for Fall B was 0.67. The student re-enrolled for the Winter B term and received 2 F's and a WP receiving a GPA of 0 and Cumulative GPA of 1.44.

Required Action: STC must utilize the Academic Policy in place at the time of the review and conduct a file review for the 2009/2010 and 2010/2011 awards years to determine if any student should have been placed on Academic Probation or Suspension based on that policy.

The result of the file review must be submitted in the following format:

- Student's Name
- Social Security Number
- Student's SAP Category (ie. full-time, part-time, etc.)
- Qualitative Determination at Each Measured Increment
- Hours Completed at Each Measured Increment
- Result of Correct Policy Application
- Amount(s) and Date(s) of Any Incorrectly Disbursed Funds, by Program

In lieu of performing a file review for the entire population (1504) for 2009/2010 and (1830) for the 2010/2011 award year to determine actual liabilities, STC has the option of performing this file review for only the remainder of the statistical sample not tested by the Department during the program review (308 for 2009/2010 and 320 for 2010/2010 remaining in the statistical samples). The results from this file review using the statistical sample will be used to project liabilities for the entire population (i.e., the average liability for the recipients in the statistical sample will be multiplied by the total population). This option is intended to reduce the burden on the institution of conducting a full file review.

If STC wishes to select this option, please use the attached statistical sample listings for award years 2009/2010 and 2010/2011 (Appendix B and C) for this finding. File reviews must be performed for all students on each statistical sample listing except those included in Appendix A of this Program Review Report for the respective award year.

If STC elects to do the full file review; it is recommended that STC first review the remainder of the students in the statistical sample. At that point, STC may decide to accept liability projection instead of continuing with a full file review.

If the Institution decides to revise its policy, it must provide a copy of that policy in response to this report and ensure that all students and staff are informed of the new standards.

STC must engage an Independent Public Accountant (IPA) to test the file review completed by STC. The IPA must develop a set of procedures designed for testing the accuracy and completeness of the file review. The suggested procedures must be provided to Pat Gilbert within 30 days of the institution's receipt of this Program Review Report. Pat Gilbert will review the procedures, indicate if any changes are needed, and approve the procedures.

The IPA must apply the Agreed Upon Procedures to test the file review completed by STC, and prepare a report including any exceptions noted during its testing. The exceptions must be detailed and identified. Exceptions must be reported for all file review elements as specified in the finding requirement as presented in the Program Review Report. The IPA's report must be submitted with STC's response to this Program Review Report.

Payments instructions for any determined liability will be provided in the Final Program Review Determination Letter.

Finding #5: Pell Underpayments/Overpayments

Citation: If an institution uses credit hours and academic terms to measure a student's progress, then the student's enrollment status (full-time, three-quarter time, half-time or, less than half-time) is used to calculate the amount of the student's Federal Pell Grant payment. A school may use its own standards for enrollment status, provided the standards meet the minimum requirements defined in regulations. *34 C.F.R. § 690.63(c)*

Noncompliance: The students identified below were overpaid due to their enrollment status:

Student #3: Enrolled for 6 hours (1/2 time) for Summer C. The student was disbursed Pell funds in the amount of \$1784 for full time status. The student should have received \$891.00. The school returned \$189.52 on 11/1/2009 based on the student's withdrawal.

Student #7: Enrolled for 1.5 hours for Winter B. The student was disbursed \$1850 in Pell funds for full-time enrollment. The student should have only received \$1388.

Student #12: Enrolled for 9 hours for Summer C. The student was disbursed \$1850 in Pell funds for full-time enrollment. The student should have only received \$1388. The student was enrolled for Winter B and Winter C for 9 hours and received Pell funds in the amount of \$1850. The student should have only received \$1388.

Student #13: Enrolled for 10.5 hours for Summer C. The Pell funds were not disbursed prior to the student withdrawing; however the school used the full time Pell of \$1783 in the R2T4 calculation.

Student #16: Enrolled for 4.5 hours (less than ½ time) for Summer B. The student was disbursed \$1850 in Pell funds for full-time enrollment. The student should have only received \$463.

Student #18: Enrolled for 10.5 hours (¾ time) for Winter C and was paid \$1850 in Pell funds for full-time enrollment. The student should have only received \$1388.

Student #28: Enrolled for Spring C term for 18 hours from 6/13/2011 – 9/1/2011. The student signed an appeal form showing he was recalled to attend Army training in Chaffee, Arkansas from 7/15/2011 – 7/30/2011. The attendance record shows the student was required to attend 64 hours and only attended 12 hours during that time period. The form was not processed due to excessive absences.

Required Action: If a student's enrollment status changes from one term to the next, the institution must recalculate the Federal Pell Grant using the new enrollment status. If the student's enrollment status changes within a term, the institution may have to recalculate the student's award under certain circumstances.

STC must conduct a file review of all students for the 2009/2010 and 2010/2011 award years and identify additional students who received ineligible Title IV funds.

Please include the results of the file review via diskette in an electronic spreadsheet, containing the following information:

- Student's Name and Social Security Number (last 4 digits)
- Award Year
- Federal Pell Grant Disbursed
- Previous Enrollment Status
- Recalculated Federal Pell Grant
- Correct Enrollment Status
- Over-award

The institution must summarize the total amount of incorrectly disbursed Pell funds by award year. For each student in the file review, the institution must submit documentation (Account Card, Academic Transcript, and Attendance Records).

STC must engage an Independent Public Accountant (IPA) to test the file review completed by STC. The IPA must develop a set of procedures designed for testing the accuracy and completeness of the file review. The suggested procedures must be

provided to Pat Gilbert within 30 days of the institution's receipt of this Program Review Report. Pat Gilbert will review the procedures, indicate if any changes are needed, and approve the procedures.

The IPA must apply the Agreed Upon Procedures to test the file review completed by STC, and prepare a report including any exceptions noted during its testing. The exceptions must be detailed and identified. Exceptions must be reported for all file review elements as specified in the finding requirement as presented in the Program Review Report. The IPA's report must be submitted with STC's response to this Program Review Report.

The institution must submit the data file in a .zip file encrypted with AES encryption (256-bit is preferred). One way to create such a file is with WinZip 11.0, available at www.winzip.com. The Department uses WinZip and the instructions for creating encrypted files with this software are enclosed. Files created with other software are also acceptable, provided they are compatible with WinZip and encrypted with AES encryption, however, the Department cannot provide support for alternate software.

In addition, STC must also develop and submit with its response, procedures which will ensure that, in the future, Title IV funds are calculated using the correct enrollment status.

The institution will be held liable for Title IV funds disbursed to student(s) without the appropriate documentation.

Repayment of liabilities will be addressed in the final program review determination letter.

Finding #6: Return to Title IV (R2T4) Calculation Errors

Citation: For students who withdraw from semester, trimester, or quarter programs, a school must perform the R2T4 calculation on a payment period basis.

34 C.F.R. § 668.22e(5)

Also, the institutional charges used in the calculation generally have to reflect the charges for the payment period. Generally, the higher the institutional charges, the greater the amount of unearned aid that is to be returned by the school. An institution must prorate the charges for the period of enrollment to correspond to a payment period.

34 C.F.R. § 668.22(g)(1)(ii)

Noncompliance: The R2T4 worksheets show the institution is checking payment period at the top of the form versus period of enrollment. However, the dates used in Step 2 "Percentage of Title IV Aid Earned" actually used the period of enrollment.

Student #3: The student completed a Leave of Absence form on 9/28/2009 with no reason provided for the LOA. A student status form was completed on 10/23/2009 stating the student withdrew. Funds were returned to lender on November 1, 2009 but the reviewer could not find a R2T4 calculation in the file. The student was also overpaid Pell funds as discussed in Finding #3.

Student #8: The attendance records show the Last Date of Attendance (LDA) was 2/4/2010. The R2T4 was calculated using 2/12/2010 as the withdrawal date.

Student #13: The R2T4 calculation used the LDA as 11/3/2009. The attendance records show the student LDA was 9/3/2009. The calculation was performed only using the funds disbursed for the payment period and the percentage was based on the period of enrollment.

Required Action: The use of payment period or period of enrollment is important for many aspects of the R2T4 calculation. To determine the treatment of Title IV funds on payment period basis, the student's Title IV program assistance to be used in the calculation is the aid that is disbursed or that could have been disbursed for the payment period. Also, institutional charges used in the calculation will only reflect charges for the payment period.

STC must ensure that it is using the correct elements in R2T4 calculations as stated above. The R2T4 calculation must be performed the students listed above.

Finding #7: Ineligible Disbursement

Citation: If a registered student withdraws or is expelled prior to the first day of classes of the period of enrollment, an institution must return any disbursed Title IV funds to the respective program. *34 C.F.R. § 668.21(a)*

If an institution disburses Title IV funds but the student does not begin attendance or the institution cannot document that the student ever began attendance, it must return any funds that were credited to the student's account, as well as the amount of any payments that the student made to the school. All schools must return funds disbursed to a student who failed to begin attendance. At a school that is required to take attendance, such as STC, it would be reasonable to expect the school to return disbursed funds immediately

following the 14-day period the school is allowed to determine that a student is not attending class. *34 C.F.R. § 668.22(b)(1)*

The Secretary considers excess cash to be any amount of Title IV, HEA program funds, other than Federal Perkins Loan Program funds, which an institution does not disburse to students or parents by the end of the third business day following the date the institution, received those funds from the Secretary. *34 C.F.R. § 668.166*

Noncompliance: STC disbursed and retained funds for student #16 who enrolled for less than ½ time for the period of the disbursement.

Student #16: Enrolled for 4.5 hours (less than ½ time) for Summer B term. The student was disbursed \$1161 Subsidized and \$1990 Unsubsidized loans.

Required Action: STC will be required to return the funds for Student #16 if documentation can't be provided that demonstrates the student was enrolled for at least ½ time.

Repayment of liabilities will be addressed in the final program review determination letter.

In addition, policies and procedures must be implemented to show how STC will prevent ineligible disbursements in the future. A copy of the procedures must be submitted with the institution's response to this finding.

Finding #8: Plus Loan Denial not Obtained

Citation: A dependent undergraduate student's eligibility for an additional unsubsidized Stafford loan amount is a dependent undergraduate student for whom the financial aid administrator determines and documents in the school's file, after review of the family financial information provided by the student and consideration of the student's debt burden, that the student's parents likely will be precluded by exceptional circumstances (e.g., denial of a PLUS loan to a parent based on adverse credit, the student's parent receives only public assistance or disability benefits, is incarcerated, or his or her whereabouts are unknown) from borrowing under the PLUS Program and the student's family is otherwise unable to provide the student's expected family contribution. A parent's refusal to borrow a PLUS loan does not constitute an exceptional circumstance. *34 C.F.R. § 682.201(a)*

Dependent students whose parents are unable to borrow PLUS loans due to adverse credit or other exceptional circumstances may receive additional unsubsidized Stafford loans for the same amount as independent undergraduate student. The Institution should examine the parent's ability to borrow a PLUS loan using an endorser who does not have an adverse credit history before certifying or originating additional unsubsidized loan amounts for the dependent student. Before certifying or originating a loan for increased loan amounts, you must document the basis of the dependent student's eligibility. The parent's denial of a PLUS loan based on adverse credit in one year does not support the dependent's eligibility in subsequent years.

Noncompliance: STC failed to obtain PLUS denial letters for the students listed below:

Student #5: Received additional Unsubsidized loan for the following loan periods: 7/2/2007 – 1/31/2008 (\$2245); 2/4/2008 – 8/28/2008 (\$2470). The Institution must obtain PLUS denial for each loan period.

Student #14: The student was awarded a \$4000 FFEL Unsubsidized loan for loan period 2/4/2008 – 8/28/2008. No PLUS denial letter was in the file.

Student #18: The student was awarded a \$2,150 FFEL Unsubsidized loan, for loan period 2/16/2009 – 8/20/2009. No PLUS denial letter was in the file.

Required Action: STC must obtain the missing parent's denial for the students listed above. The Institution will be liable for all funds disbursed if documentation is not obtained.

The Institution must also implement procedures to prevent reoccurrence of this finding in future Program Review or Audits and provide a copy in response to this finding.

Finding #9: Invalid High School Diploma

Citation: Citation: 34 C.F.R. § 668.32(a)(2)(e)(1) states a student is eligible to receive Title IV, HEA program assistance if the student has a high school diploma or its recognized equivalent.

Noncompliance: Two students appear to have invalid High School Diplomas.

Student #22's attestation stated he received a GED from Continental Academy located in Orlando, Florida in 2006.

Student #25's attestation stated he received a High School Diploma from Colonial High School in Orlando, Florida in May 2003.

Required Action: The Institution must implement procedures to ensure the validity of high school diplomas before student are admitted and disbursed Title IV funds. A copy of the procedures must be submitted in response to this report.

These appear to be isolated incidents.

Finding #10: Award Letter Not Updated

Citation: An institution must provide adequate financial aid counseling to eligible students who apply for Title IV assistance. Specifically, the institution must notify the student of the amount he/she can expect to receive, and how and when those funds will be will be disbursed. *34 C.F.R. § 668.16(h)*

Noncompliance: STC failed to properly document the awarding of the Federal Supplemental Educational Opportunity Grant (FSEOG) on the award letters for all students in the review sample.

Required Action: The Institution must develop a policy with procedures to ensure that each student is counseled and notified of the amount of Title IV aid he/she can expect to receive, and how and when that amount will be paid. A copy of this newly developed policy and procedures must be submitted to this office in response to this finding.

Finding #11: FSEOG Minimum Award Requirement Not Met

Citation: An institution may award an FSEOG in an amount it determines a student needs to continue his/her studies for an academic year. However, a Federal SEOG may not be awarded for a full academic in an amount that is less than \$100 or more than \$4,000. For a student enrolled for less than a full academic year, the minimum allowable Federal SEOG award may be proportionately reduced.

Noncompliance: The Institution is awarding students FSEOG funds in amounts less than the minimum amount of \$100.

Required Action: In response to this finding, the institution must develop procedures to ensure that students receive FSEOG awards that are within the minimum allowable amounts. A copy of these procedures must be submitted in response to this finding.

Finding #12: Credit Balance Authorization Form Needs Revisions

Citation: In obtaining the student's or parent's authorization to perform an activity described in paragraph (b) (1) of this section, an institution may not require or coerce the student or parent to provide that authorization, must allow the student or parent to cancel or modify that authorization at any time and must clearly explain how it will carry out that activity. *34 C.F.R. § 668.164(e)*

If current year Title IV funds credited to a student's account exceed the amount of current year tuition, fees, and other authorized charges, 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 credit balance occurred if it occurred *after* the first day of class. If the credit balance occurred on or *before* the first day of class, it must be returned no later than 14 days after the first day of class.

An institution may secure a student's written permission to retain credit balance funds for budgeting purposes but it must be optional. The student must not be coerced into providing the school permission to retain the funds and the student must be informed of his or her right to rescind the authorization at any time. If an institution holds excess student funds, it must—

- Identify the amount of funds it holds for each student or parent in a subsidiary ledger account designed for that purpose;
- Maintain, at all times, cash in its bank account in an amount at least equal to the amount of funds the institution holds for the student; and
- Notwithstanding any authorization obtained by the institution, pay any remaining balance on loan funds by the end of the loan period and any other remaining Title IV funds by the end of the last payment period in the award year for which they were awarded.

If a school has lost contact with a student who is due a credit balance, it must use all reasonable means to locate him or her. If it still cannot find the student, the school must return the credit balance to the lender to reduce the borrower's loan balance, or, to the appropriate Title IV program(s).

Noncompliance: STC's procedure for obtaining a student's authorization to retain Title IV credit balance funds does not appear to be optional for students.

Students are required to sign a form called "Voluntary Authorization Agreement" which states "I authorize Southern Technical College to initiate credit entries for financial aid amounts, debit entries and any adjustment to my account."

"If a credit balance appears on my account, I authorize the institution to determine if the credit is in excess of my tuition, fees and any other applicable charges for the completion of the current loan period or award years as applicable. If this is the case and there is a true excess, I authorize the school to hold these funds until such time as I have earned the aid based on the Federal Return to Title IV Funds Policy."

The only preference the student can select is "I authorize the school to refund any credit balance to my lender in order to reduce my overall student loan debt."

Required Action: We also remind the institution that Title IV aid credited to a student's account may be used to satisfy current year charges (per 34 C.F.R. § 668.164 [d]). If a student's aid package includes a Title IV loan, the year is the loan period. If the student does not have a loan, the year is the award year. The maximum amount of prior year charges that may be paid with current year funds is \$200.

STC is required to revise its procedures for the payment of and authorization to retain student credit balance funds. The student must be given the option of having their credit balances returned to them within 14 days as stated in the regulations. Returning loan funds on behalf of the student is not a part of the cost of attendance. Further, the student must not be coerced into signing the credit balance authorization form as stated in the Institution's policy as a required document. The policy must be in compliance with the above requirements, and, it must take effect immediately.

Please provide a copy of your revised policy and authorization form in response to this finding.

Finding #13: Policy/Procedures Manual Missing

Citation: To participate in the Federal Student Aid (FSA) programs, a school must demonstrate that it is administratively capable of providing the education it promises and properly managing the FSA programs. *34 C.F. R. § 668.16*

Noncompliance: STC does not currently have a policies and procedures manual that describes how all the various function described in 34 CFR 668.16 are being properly administered.

Required Action: While the regulations do not specifically state that an Institution must have a policies and procedures manual, it does however state that an Institution must demonstrate that it is capable of adequately administering the program under each of the standards established in this section.

The Financial Aid Director stated the manual was still in the developing stages.

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In response to this finding, STC must provide a copy of the manual.

Student Sample

2009/2010

Student's Name

**Student's SSN (last four
digits Only)**

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

2010/2011

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

2009/2010

Random#	SSN	\$\$\$PELL	\$\$\$AGG	\$\$\$SMART	\$\$\$TEACH	\$\$\$SEOG	\$\$\$FWS	\$\$\$PERKINS	FSTAFFORD \$SUB	FSTAFFORD \$UNSUB	FSTAFFO RD \$PLUS	FOIRECT \$SUB	FOIRECT \$UNSUB	FOIRECT \$DPLUS	CURRENT ENROLLM ENT STATUS	WITHDRAW AL DATE	LAST DATE OF ATTENDAN CE	R2T4 RETURN AMOUNT	DATE OF RETURN
0.000308935	1528	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	11/2/2009	10/1/2009	\$1,040.80	11/20/2009
0.001401322	1465	\$3,567.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.001806556	8	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	10/5/2010	9/9/2010	\$0.00	N/A
0.001834711	750	\$3,567.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.001982283	75	\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$1,990.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.002282004	1546	\$5,350.00	\$0.00	\$0.00	\$0.00	\$66.87	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.002519767	523	\$1,912.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.002778568	521	\$1,594.48	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.003036149	1549	\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	10/23/2009	9/24/2009	\$3,193.76	11/1/2009
0.00389424	830	\$1,784.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.004241123	1341	\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.005259383	911	\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.005847729	960	\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,163.00	\$1,990.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.006106073	1378	\$148.07	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	4/14/2010	3/25/2010	\$330.50	4/22/2010
0.006302542	1038	\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	4/14/2010	3/25/2010	\$330.50	4/22/2010
0.006349031	1366	\$7,134.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$1,990.00	\$0.00	Drop	2/12/2010	2/4/2010	\$1,635.93	2/18/2010
0.006849326	293	\$1,784.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$7,954.00	\$11,940.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.007094596	483	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.00727845	1377	\$4,735.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,163.00	\$1,990.00	\$0.00	Drop	8/3/2009	7/15/2009	\$0.00	N/A
0.008859888	1357	\$7,134.00	\$0.00	\$0.00	\$0.00	\$66.87	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$1,990.00	\$0.00	Drop	3/9/2010	1/20/2010	\$4,572.00	3/24/2010
0.008946768	833	\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$3,980.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.009397368	342	\$3,567.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$3,980.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.0098085	1252	\$3,567.00	\$0.00	\$0.00	\$0.00	\$66.87	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.010199674	777	\$3,567.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.010403786	544	\$0.00	\$0.00	\$0.00	\$0.00	\$66.87	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.011628469	1461	\$1,784.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.013837916	1428	\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.014218391	31	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	8/30/2010	5/11/2010	\$0.00	N/A
0.014484366	865	\$7,134.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	9/29/2009	8/3/2009	\$0.00	N/A
0.01490551	543	\$4,637.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,991.00	\$10,727.00	Graduate	N/A	N/A	N/A	N/A
0.015193814	30	\$7,134.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.015675195	275	\$5,350.00	\$0.00	\$0.00	\$0.00	\$66.87	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.016855687	1129	\$148.07	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	6/15/2011	5/12/2011	\$0.00	N/A
0.017912558	570	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	10/16/2009	10/1/2009	\$1,635.93	11/1/2009
0.018587735	1281	\$7,134.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	5/25/2011	5/17/2011	\$0.00	N/A
0.018936882	277	\$1,784.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$1,990.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.020734766	1430	\$1,300.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$3,980.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.020829973	1034	\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	8/10/2010	4/8/2010	\$2,168.32	8/20/2010
0.02221483	698	\$1,784.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$664.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.022932515	403	\$1,301.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	9/23/2009	8/27/2009	\$0.00	N/A
0.023228871	500	\$2,800.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	3/18/2011	2/4/2011	\$0.00	N/A
0.023477732	824	\$5,944.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.023683367	198	\$7,134.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.025079189	382	\$7,134.00	\$0.00	\$0.00	\$0.00	\$66.87	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$1,991.00	\$6,582.00	Drop	9/1/2010	7/29/2010	\$0.00	N/A
0.026374935	241	\$7,134.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$7,954.00	\$11,940.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.026856044	372	\$0.00	\$0.00	\$0.00	\$0.00	\$66.87	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.028768112	114	\$1,784.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	9/9/2009	8/20/2009	\$1,207.43	9/18/2009
0.027824414	1365	\$0.00	\$0.00	\$0.00	\$0.00	\$66.87	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	8/9/2010	7/27/2010	\$0.00	N/A
0.02839225	442	\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$3,980.00	\$0.00	Drop	8/23/2010	5/20/2010	\$0.00	N/A
0.029047045	252	\$1,784.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.029486573	1088	\$1,784.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	4/15/2011	3/30/2011	\$0.00	N/A
0.030047895	1490	\$3,567.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	8/15/2010	5/19/2010	\$0.00	N/A
0.030221325	485	\$5,350.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,979.00	\$7,980.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.033175878	274	\$1,784.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Active	N/A	N/A	N/A	N/A
		\$1,167.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$6,387.40	\$7,980.00	\$0.00	Drop	8/9/2010	4/29/2010	\$0.00	N/A
												\$1,162.00	\$1,990.00	\$0.00	Drop	1/2/2011	10/27/2010	\$0.00	N/A

APPENDIX B

2010/2011

Random#	SSN	LAST NAME	FIRST NAME	\$FPELL	\$ACQ	\$SMART	\$TEACH	\$FREQ	\$FWS	\$PPERKINS	FSTAFFORD \$SUB	FSTAFFORD \$UNSUB	FSTAFFO RD \$PLUS	FDIRECT \$SUB	FDIRECT \$UNSUB	FDIRECT \$FOPLUS	CURRENT ENROLLM ENT STATUS	WITHDRAW AL DATE	LAST DATE OF ATTENDAN CE	R2T4 RETURN AMOUNT	DATE OF RETURN
0.000756786	(b)(6); (b)(7)(C)			\$5,550.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,479.00	\$5,970.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.000872891	(b)(6); (b)(7)(C)			\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	12/20/2010	12/16/2010	\$0.00	N/A
0.001460801	(b)(6); (b)(7)(C)			\$3,700.00	\$0.00	\$0.00	\$0.00	\$80.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.002024539	(b)(6); (b)(7)(C)			\$7,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.002508803	(b)(6); (b)(7)(C)			\$5,100.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,479.00	\$5,970.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.00408451	(b)(6); (b)(7)(C)			\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.005383077	(b)(6); (b)(7)(C)			\$1,850.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,182.00	\$1,990.00	\$0.00	Drop	8/17/2011	5/12/2011	\$0.00	N/A
0.005986058	(b)(6); (b)(7)(C)			\$583.98	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	3/11/2011	2/22/2011	\$2,187.04	3/17/2011
0.006198574	(b)(6); (b)(7)(C)			\$7,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,479.00	\$5,988.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.006517583	(b)(6); (b)(7)(C)			\$3,700.00	\$0.00	\$0.00	\$0.00	\$80.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.006702782	(b)(6); (b)(7)(C)			\$7,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.006799297	(b)(6); (b)(7)(C)			\$5,550.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.007451838	(b)(6); (b)(7)(C)			\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Drop	4/22/2011	4/21/2011	\$0.00	N/A
0.00898751	(b)(6); (b)(7)(C)			\$3,700.00	\$0.00	\$0.00	\$0.00	\$80.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	2/16/2010	2/3/2010	\$1,077.54	2/18/2010
0.009209857	(b)(6); (b)(7)(C)			\$1,850.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$3,980.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.009228424	(b)(6); (b)(7)(C)			\$3,700.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.009229508	(b)(6); (b)(7)(C)			\$3,237.80	\$0.00	\$0.00	\$0.00	\$80.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,986.00	\$1,162.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.011247172	(b)(6); (b)(7)(C)			\$3,700.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,493.00	\$1,874.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.011906997	(b)(6); (b)(7)(C)			\$3,700.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$3,980.00	\$0.00	Drop	2/9/2011	1/18/2011	\$0.00	N/A
0.011986773	(b)(6); (b)(7)(C)			\$3,700.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.74	\$0.00	\$0.00	Drop	11/29/2010	10/29/2010	\$3,151.28	12/2/2010
0.012334742	(b)(6); (b)(7)(C)			\$7,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,479.00	\$5,623.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.012680735	(b)(6); (b)(7)(C)			\$784.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$3,980.00	\$0.00	Drop	5/20/2011	4/16/2011	\$0.00	N/A
0.013161701	(b)(6); (b)(7)(C)			\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	8/9/2010	5/27/2010	\$1,684.00	6/1/2010
0.014551289	(b)(6); (b)(7)(C)			\$7,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,479.00	\$5,603.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.014575274	(b)(6); (b)(7)(C)			\$1,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.014698015	(b)(6); (b)(7)(C)			\$7,400.00	\$0.00	\$0.00	\$0.00	\$68.67	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$8,471.00	\$9,583.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.014781457	(b)(6); (b)(7)(C)			\$1,500.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	8/18/2011	5/19/2011	\$4,515.50	7/7/2011
0.015559424	(b)(6); (b)(7)(C)			\$6,783.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,546.00	\$1,877.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.015938014	(b)(6); (b)(7)(C)			\$7,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$6,471.00	\$9,789.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.016088885	(b)(6); (b)(7)(C)			\$1,879.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,164.10	Drop	2/16/2011	1/19/2011	\$2,287.90	3/8/2011
0.016208882	(b)(6); (b)(7)(C)			\$3,500.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,986.00	\$3,980.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.017054455	(b)(6); (b)(7)(C)			\$7,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,479.00	\$5,620.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.01706046	(b)(6); (b)(7)(C)			\$1,434.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,162.00	\$1,990.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.017447584	(b)(6); (b)(7)(C)			\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	9/14/2010	8/19/2010	\$0.00	N/A
0.018550117	(b)(6); (b)(7)(C)			\$1,850.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,182.00	\$684.00	\$0.00	Drop	11/30/2010	11/15/2010	\$0.00	N/A
0.01899405	(b)(6); (b)(7)(C)			\$4,834.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,309.00	\$7,980.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.019558118	(b)(6); (b)(7)(C)			\$5,550.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.019588207	(b)(6); (b)(7)(C)			\$1,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,182.00	\$1,990.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.019752191	(b)(6); (b)(7)(C)			\$7,400.00	\$0.00	\$0.00	\$0.00	\$68.67	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$8,471.00	\$9,782.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.020475209	(b)(6); (b)(7)(C)			\$1,787.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.020743802	(b)(6); (b)(7)(C)			\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	10/29/2010	10/7/2010	\$0.00	N/A
0.020885724	(b)(6); (b)(7)(C)			\$3,700.00	\$0.00	\$0.00	\$0.00	\$80.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$3,980.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.020984221	(b)(6); (b)(7)(C)			\$8,012.50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,752.77	\$3,749.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.022382486	(b)(6); (b)(7)(C)			\$8,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,479.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.023051172	(b)(6); (b)(7)(C)			\$4,317.00	\$0.00	\$0.00	\$0.00	\$80.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,355.00	\$5,005.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.023965544	(b)(6); (b)(7)(C)			\$2,035.07	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	11/1/2010	9/29/2010	\$4,902.00	11/15/2010
0.024490973	(b)(6); (b)(7)(C)			\$3,133.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.024882828	(b)(6); (b)(7)(C)			\$3,700.00	\$0.00	\$0.00	\$0.00	\$80.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$3,980.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.025298008	(b)(6); (b)(7)(C)			\$7,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.025320657	(b)(6); (b)(7)(C)			\$3,700.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,435.00	\$1,990.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
0.026108987	(b)(6); (b)(7)(C)			\$7,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
0.026488116	(b)(6); (b)(7)(C)			\$4,254.34	\$0.00	\$0.00	\$0.00	\$80.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$3,980.00	\$0.00	Drop	7/13/2011	6/23/2011	\$3,521.66	8/2/2011

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

00871132	\$5,550.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
00884954	\$1,850.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
00886180	\$7,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,309.00	\$7,895.00	\$0.00	Active	N/A	N/A	N/A	N/A
00901014	\$1,850.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
00916869	\$3,400.00	\$0.00	\$0.00	\$0.00	\$66.87	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
00920202	\$1,850.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Active	N/A	N/A	N/A	N/A
00921670	\$5,550.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,479.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
00922261	\$3,600.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$3,860.00	\$0.00	Drop	8/15/2011	8/2/2011	\$0.00	N/A
00924178	\$1,850.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,182.00	\$1,990.00	\$0.00	Active	N/A	N/A	N/A	N/A
00924346	\$3,700.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
00936393	\$3,237.50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,625.53	\$0.00	\$0.00	Drop	3/11/2011	2/8/2011	\$2,969.49	3/25/2011
00936874	\$3,700.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
00944979	\$616.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
00949043	\$1,387.50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$434.40	\$0.00	\$0.00	Drop	5/5/2011	4/21/2011	\$2,121.60	5/20/2011
00956336	\$3,700.00	\$0.00	\$0.00	\$0.00	\$80.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,323.00	\$3,980.00	\$0.00	Drop	8/12/2011	8/3/2011	\$0.00	N/A
00962204	\$1,200.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Active	N/A	N/A	N/A	N/A
00964083	\$5,550.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,647.00	\$2,855.00	\$12,099.00	Active	N/A	N/A	N/A	N/A
00969384	\$1,850.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,479.00	\$5,970.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
00986593	\$1,387.50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Active	N/A	N/A	N/A	N/A
00987898	\$6,012.50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$823.24	\$0.00	\$0.00	Drop	6/17/2011	5/18/2011	\$409.31	6/30/2011
00988301	\$4,162.50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,480.00	\$5,970.00	\$0.00	Drop	7/21/2011	7/5/2011	\$3,513.50	8/4/2011
00997810	\$5,550.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,479.00	\$5,897.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
01008192	\$3,700.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,986.00	\$3,980.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
01010978	\$3,237.50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,327.38	\$1,807.00	\$0.00	Drop	4/15/2011	3/15/2011	\$4,587.50	4/28/2011
01013104	\$5,550.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,479.00	\$5,970.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
01020148	\$5,550.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,976.00	\$6,537.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
01020552	\$7,400.00	\$0.00	\$0.00	\$0.00	\$80.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
01023023	\$1,850.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,182.00	\$1,990.00	\$0.00	Drop	12/1/2011	12/18/2010	\$0.00	N/A
01023082	\$1,079.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Active	N/A	N/A	N/A	N/A
01034436	\$6,134.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,479.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
01035875	\$967.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
01038180	\$7,400.00	\$0.00	\$0.00	\$0.00	\$66.87	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$6,471.00	\$9,581.00	\$0.00	Active	N/A	N/A	N/A	N/A
01044712	\$1,850.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	9/3/2010	8/11/2010	\$2,855.53	9/20/2010
01045081	\$5,550.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
01049976	\$7,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,479.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
01050430	\$7,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
01053838	\$7,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$7,852.00	\$10,200.00	\$0.00	Active	N/A	N/A	N/A	N/A
01055827	\$7,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,979.00	\$7,960.00	\$0.00	Active	N/A	N/A	N/A	N/A
01062530	\$1,334.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$1,182.00	\$1,990.00	\$0.00	Drop	1/19/2011	10/21/2010	\$0.00	N/A
01063979	\$600.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
01065339	\$7,400.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,479.00	\$5,970.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
01071489	\$3,534.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
01070423	\$3,700.00	\$0.00	\$0.00	\$0.00	\$80.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$3,860.00	\$0.00	Active	N/A	N/A	N/A	N/A
01073968	\$6,837.50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,719.38	\$5,970.00	\$0.00	Drop	8/21/2011	8/13/2011	\$2,675.31	6/30/2011
01074137	\$2,200.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Active	N/A	N/A	N/A	N/A
01105464	\$332.06	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	8/8/2010	7/7/2010	\$534.94	8/17/2010
01107281	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	7/29/2010	7/12/2010	\$0.00	N/A
01108275	\$2,734.00	\$0.00	\$0.00	\$0.00	\$80.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
011140154	\$5,550.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,479.00	\$5,833.00	\$0.00	Graduate	N/A	N/A	N/A	N/A
01132511	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$3,860.00	\$0.00	Active	N/A	N/A	N/A	N/A
01142487	\$5,550.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$4,420.00	\$3,980.00	\$0.00	Active	N/A	N/A	N/A	N/A
011426912	\$5,550.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,071.00	\$6,385.00	\$0.00	Active	N/A	N/A	N/A	N/A
0115374	\$3,700.00	\$0.00	\$0.00	\$0.00	\$80.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,485.00	\$5,970.00	\$0.00	Active	N/A	N/A	N/A	N/A
011550478	\$3,700.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,986.00	\$3,980.00	\$0.00	Drop	3/11/2011	2/24/2011	\$0.00	N/A
01158209	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Drop	8/8/2010	7/29/2010	\$0.00	N/A
011661894	\$4,274.72	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,324.00	\$3,980.00	\$0.00	Drop	3/29/2011	3/17/2011	\$3,501.28	4/7/2011
01169154	\$4,183.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,986.00	\$3,860.00	\$0.00	Drop	7/15/2011	6/30/2011	\$0.00	N/A

**DEPARTMENT OF EDUCATION
FED-WIRE EFT MESSAGE FORMAT & INSTRUCTIONS**

ABA Number 021030004	Type/Sub-Type	
Sender No.:	Sender Ref. No.	Amount ①

Sender Name (Automatically inserted by the Federal Reserve Bank)

Treasury Department Name/CTR/
TREAS NYC / CTR /

BNF=ED / AC - 91020001 OBI=

Name / City / State:

②

DUNS / TIN:

③

FOR:

④

INSTRUCTIONS

A. Complete circled items 1-4 above as follows:

- ①** Indicate amount including cents digits.
- ②** Indicate Name, City, and State.
- ③** Indicate DUNS Number and Taxpayer Identification Number (TIN).
- ④** Enter the reason for the remittance: Bill Number / Document Number / Other.

B. Provide the sending bank with a copy of the completed form. This form contains other information the bank will need to transmit the FEDWIRE message.