Index Sheet

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School Year: 2011

ACN:

PRCN: 201130527579

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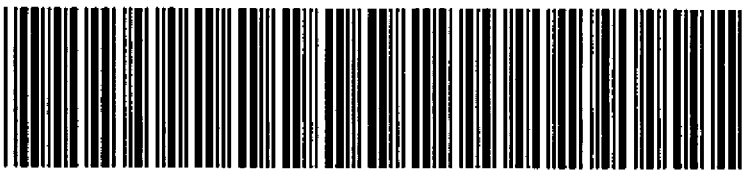

DC

March 4, 2013

Dr. Para Jones
President
Stark State College
6200 Frank Avenue Northwest
North Canton, OH 44720-7299

Certified Mail Return Receipt Requested
Domestic Return Receipt
7012164000006265

RE: **Final Program Review Determination**
OPE ID: 01088100
PRCN: 201130527579

Dear Dr. Jones:

The U.S. Department of Education's (Department's) School Participation Division Chicago/Denver issued a program review report on November 16, 2011 covering Stark State's administration of programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2009-2010 and 2010-2011 award years. The institution's final response was received on December 27, 2011.

The Chicago/Denver School Participation Division has reviewed Stark State's response(s) to the Program Review Report. A copy of the Program Review Report (and related attachments) and Stark State's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by Stark State 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.

Stark State's response has resolved all findings. On January 24, 2013 Stark State indicated that the $5403.75 of FFEL loan funds for Stephanie Mayer were returned to Great Lakes Educational Loan Services. As a result of the program review conducted in May of 2011, it has been determined that the student was not eligible to receive loan funds for the Spring 2009 and Fall 2009 terms. Therefore, Stark State returned $2695.00 for the Spring 2009 term and $2798.75 for the Fall 2009 term. On February 7, 2013 the institution provided the Department with a copy of a cancelled check indicating that the appropriate returns were made.

In addition, Stark State has provided assurances that the appropriate corrective actions including updated procedures for reporting to the Clearinghouse and improved exit counseling processes were implemented. These corrective actions have been taken to resolve and prevent future occurrences of all findings. Therefore, Stark State may consider the program review closed with no further action required.

The Program Review Report included findings concerning Student #12 and Student 26 not meeting Satisfactory Academic Progress. Based on the response submitted by Stark State, the Chicago/Denver School Participation Division has determined that Student #12 and Student #26 were eligible to receive Title IV assistance during their period of enrollment.

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

If you have any questions please call Oksana Apanovich at (312) 730-1686.

Sincerely,

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

Douglas Parrott
Division Director

Enclosure: Program Review Report (with attachments)
Stark State's Response to the Program Review Report

cc: Mrs. Amy L. Welty, Dean, Financial Aid and Registration
North Central Association of Colleges and Schools - CIHE (Higher Educ)
OH Board of Regents

START HERE GO FURTHER FEDERAL STUDENT AID

Prepared for

Stark State College

OPE ID 01088100
PRCN 2011 305 27579

Prepared by
U.S. Department of Education
Federal Student Aid
School Participation Team – Chicago/Denver

Program Review Report

November 16, 2011

U.S. Department of Education, Federal Student Aid, Chicago/Denver School Participation Team
500 West Madison Street, Room 1576, Chicago, IL 60661
www.FederalStudentAid.ed.gov
1-800-4-FED-AID

Table of Contents

Table of Contents

Page

A. Institutional Information....2

B. Scope of Review....3

C. Findings....3

Finding 1. Satisfactory Academic Progress Not Adequately Maintained....3
Finding 2. Ineligible Loan Disbursement....7
Finding 3. Late Reporting to Automated Clearing House....8
Finding 4. Exit Counseling Deficiencies....8

D. Appendix A: Student Sample....10
Appendix B: Statistical Sample 2009/10....11
Appendix C: Statistical Sample 2010/11....12

A. Institutional Information

Stark State College
6200 Frank Avenue Northwest
North Canton, OH 44720-7299

Type: Public

Highest Level of Offering: Associate's Degree

Accrediting Agency: North Central Association of Colleges and Schools - CIHE (Higher Educ)
Current Student Enrollment: 14,826 (2010)

Title IV Participation Postsecondary Education Participants System (PEPS):

	2009-2010
Federal Pell Grant	$ 25,657,570
Federal Family Educational Loan (FFEL)	$ 54,554,796
William D. Ford Federal Direct Loan Program (Direct Loan)	$ 9,187,933
Federal Supplemental Educational Opportunity Grant (FSEOG)	$ 164,873.00
Federal Work Study	$ 413,173.00

Default Rate FFEL/DL:	2009	12.3%
	2008	8.7%
	2007	6.8%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Stark State College (Stark State) from May 2, 2011 to May 6, 2011. The review was conducted by Oksana Apanovich, Clare Barger, and William Johnson.

The focus of the review was to determine Stark State'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 Stark State'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 Stark State'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 Stark State 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 Stark State to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding 1. Satisfactory Academic Progress (SAP) Standards Not Adequately Monitored

Citation:

For purposes of determining student eligibility for assistance under a Title IV, HEA program, the Secretary considers an institution to have administrative capability if the institution establishes, publishes and applies reasonable standards for measuring whether an otherwise eligible student is maintaining satisfactory progress in their educational program. The Secretary considers an institution's standards to be reasonable if the standards:

1) Are the same as or stricter than the institution's standards for a student enrolled in the same educational program who is not receiving Title IV assistance;
2) Including the following elements:

   i. A qualitative component that consists of grades, work projects completed or comparable factors that measure against a norm.
   ii. **A quantitative component that consists of a maximum timeframe in which a student must complete their educational program.** The timeframe must:

   A. For an undergraduate program, be no longer than 150 percent of the published length of the educational program measured in the academic years, terms, credit hours attempted, etc. as appropriate;
   B. Be divided into increments, not to exceed the lesser of one academic year or one-half the published length of the educational program;
   C. Include a schedule established by the institution designating the minimum percentage or amount of work that a student must successfully complete at the end of each increment to complete their educational program within the maximum timeframe; and
   D. Include specific policies defining the effect of course incompletes, withdrawals, repetitions, and noncredit remedial courses on satisfactory progress;

3) Provide for consistent application of standards to all students;
4) Provide for a determination at the end of each increment by the institution as to whether the student has met the qualitative and quantitative components of the standards;
5) Provide specific procedures under which a student may appeal a determination that the student is not making satisfactory progress; and
6) Provide specific procedures for a student to re-establish eligibility. *34 CFR 668.16(e)*

By not adequately or consistently monitoring academic progress standards for its students, the institution may be disbursing Title IV funds to ineligible students. This practice deprives other eligible students of aid and creates increased expense to the Department.

Noncompliance:

The institution did not consistently or adequately apply its satisfactory academic progress (SAP) policy standards to all of its students. Specifically, the institution did not suspend students after a second term of below standard performance academically; and students that should have been ineligible for Title IV funds received assistance. We noted two students

that should have been suspended who received additional Title IV assistance during periods of ineligible enrollment that are described below.

Student #9 failed to meet the institution's SAP standard for completion rate after the Spring 2008 semester. She was warned about her failure to make progress at that time and placed on probation for the Fall 2008 semester. She had still not met the institution's SAP standard for completion rate after the Fall 2008 semester and should have been terminated from financial aid eligibility at the time. For the Spring of 2009 and Fall 2009 semesters student's completion rates were 48% and 60% respectively. As the student had failed to meet the institution's progress standards for two consecutive semesters, she was not eligible for Federal Direct Stafford Loan funds that were disbursed to her on August 24, 2009 and December 9, 2009. These funds were improperly disbursed to an ineligible student and represent an institutional liability that must be repaid.

Student #12 was put on academic probation after the Spring 2008 semester as her completion rate was 50%. After the Spring 2009 semester student's completion rate was 57%. The student should have been terminated from the financial aid eligibility from the Summer 2009 Semester onwards since her completion rate was 60% for the Summer 2009 semester, 59% for the Fall 2009 semester, 50% for the Spring 2010 semester, 63% for the Summer 2010 semester, and 52.6% for the Fall 2010 semester. However, the institution considered her to be eligible and kept disbursing Title IV funds to the student. As the student had failed to meet the institution's progress standards for two consecutive semesters, she was not eligible for the federal funds disbursed to her for the Summer 2009, Fall 2009, Spring 2010, Summer 2010, Fall 2010, and Spring 2011 semesters. These funds were improperly disbursed to an ineligible student and represent an institutional liability that must be repaid.

Stark State must present proof that the funds were returned to the Department by documenting Federal Pell Grant, Federal Direct Unsubsidized Loan, and Federal Direct Subsidized Loan disbursement records for student #12 and COD refunds reflecting the repayments.

Student #26 should have been put on academic probation for the Spring 2011 semester as the student's quantitative SAP was 53% after the Fall 2010 term. There was no documentation to indicate the student had been warned by Stark State of not making SAP progress.

Required Action:

Due to the extensive nature of this finding, the institution must perform a file review for all students for the 2009-2010 and 2010-2011 award years. Results of the file review should be presented in spreadsheet format and contain the following information:

1. Student name;
2. Student Social Security Number;
3. Term student became ineligible;

4. Amount and date of Federal Pell Grant funds disbursed during the terms that the student was ineligible;
5. Amount and date of FSEOG funds disbursed during terms that the student was ineligible;
6. Amount and date of FFEL/Federal Direct Stafford Subsidized funds disbursed during terms that the student was ineligible;
7. Amount and date of FFEL/Federal Direct Stafford Unsubsidized funds disbursed during terms that the student was ineligible; and
8. Amount and date of FFEL PLUS funds disbursed during terms that the student was ineligible.

In addition to the above spreadsheet, Stark State must submit copies of:

- each student's complete unofficial academic transcript for all periods of attendance through the 2010/11 academic year,
- each student's detail financial record for the periods of attendance during the 2009/10 and 2010/11 academic years,
- each student's admissions record,
- each student's ISIR for the periods of attendance during the 2009/10 and 2010/11 academic years, and
- copies of any academic probation, academic progress appeal and other academic progress related correspondence between Stark State and the student.

The results of the file review must be submitted as a response to this report. The institution is liable for the funds it improperly retained. Instructions for payment of liabilities resulting from this finding will be provided in the Department's Final Program Review Determination Letter.

In lieu of performing a file review for the entire population of Title IV recipient students for the 2009/10 and the 2010/11 award years to determine actual liabilities, Stark State 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. 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 Stark State wishes to select this option, please use the attached statistical sample listings for award years 2009/10 and 2010/11 (See Appendices 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 Stark State elects to do the full file review, it is recommended that Stark State first review the remainder of the students in the statistical sample. At that point, Stark State may decide to accept liability projection instead of continuing with a full file review.

Finding 2. Ineligible Loan Disbursement

Citation:

Pursuant to 34 C.F.R, § 668.32, a student is eligible to receive Title IV, HEA program assistance if the student either meets all of the requirements in paragraphs (a) through (m) of this section or meets the requirement in paragraph (n) of this section as follows:

(a)(1)(i) Is a regular student enrolled, or accepted for enrollment, in an eligible program at an eligible institution;

(ii) For purposes of the FFEL and Direct Loan programs, is enrolled for no longer than one twelve-month period in a course of study necessary for enrollment in an eligible program; or

(iii) For purposes of the Federal Perkins Loan, FWS, FFEL, and Direct Loan programs, is **enrolled or accepted for enrollment as at least a half-time** student at an eligible institution in a program necessary for a professional credential or certification from a State that is required for employment as a teacher in an elementary or secondary school in that State;

Noncompliance:

Student #29 never attended Spring 2011 semester and thus was not eligible for Title IV Assistance. On January 1, 2011 Stark State disbursed an Unsubsidized Loan in the amount of $2,585.00 and a Subsidized Loan in the amount of $1,742.00 to the student. There was no evidence that these amounts were returned to the Department.

Required Action:

Stark State must return $2,585.00 in Federal Direct Unsubsidized Loan funds and $1,742.00 in Federal Direct Subsidized funds to the Department for the amount of Title IV, HEA funds disbursed during the Spring 2011 term for student #29.

Stark State must present proof that the funds were returned to the Department by documenting Federal Direct Unsubsidized Loan and Federal Direct Subsidized Loan disbursement records for student #29 and COD refunds reflecting the $2,585.00 and $1,742.00 repayments.

Instructions for the repayment of any unpaid liability will be provided in the Final Program Review Determination Letter.

Finding 3. Incorrect Date Reported to Automated Clearing House

Citation:

34 C.F.R. § 673.3(b) states an institution shall account for the receipt and expenditure of Title IV, HEA program funds in accordance with generally accepted accounting principles. An institution shall establish and maintain on a current basis (i) financial records that reflect each HEA, Title IV program transaction; and (ii) general ledger control accounts and related subsidiary accounts that identify each Title IV, HEA program transaction and separate those transactions from all other institutional financial activity.

Noncompliance:

For student #9 Stark State reported incorrect date to Automated Clearing House (ACH). The institution should have reported the date the student dropped to less than half-time. Instead, Stark State reported the student's drop date. As a result, the student got a longer grace period than she was entitled to get.

Required Action:

Stark State must develop adequate procedures to ensure accurate reporting to Automated Clearing House.

Finding 4. Exit Counseling Deficiencies

Citation:

Pursuant 34 CFR 682.604(g), a school must conduct exit counseling with each Stafford loan borrower either in person, by audiovisual presentation, or by interactive electronic means. In each case, the school must conduct this counseling shortly before the student borrower ceases at least half-time study at the school. If a student borrower withdraws from school without the school's prior knowledge or fails to complete an exit counseling session as required, the school must provide exit counseling through either interactive electronic means or by mailing written counseling materials to the student borrower at the student borrower's last known address within 30 days after learning that the student borrower has withdrawn from school or failed to complete the exit counseling as required.

Noncompliance:

During the program review the reviewers noted that two students did not complete their exit interviews.

Student #25 withdrew from the institution on October 21, 20101. There is no evidence that exit interview materials were sent to the student.

Student # 29 never started attendance in Spring 2011 semester. Stark State sent a note to the student to complete exit interview online; however, no exit interview materials were mailed to the student.

Required Action:

The institution must ensure that exit counseling is performed on a timely basis. The institution's failure to provide exit loan counseling increases the possibility of a student defaulting on their loans. Loans that go into default create an increased expense for the U.S. Department of Education.

Appendix A: Student Sample

2009-2010

	Student's Name	Student's SSN (last four digits only)
1.	(b)(6); (b)(7(C),(b)(7)(C)	
2.		
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2010-

SN (last nly)

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17.		
18.		
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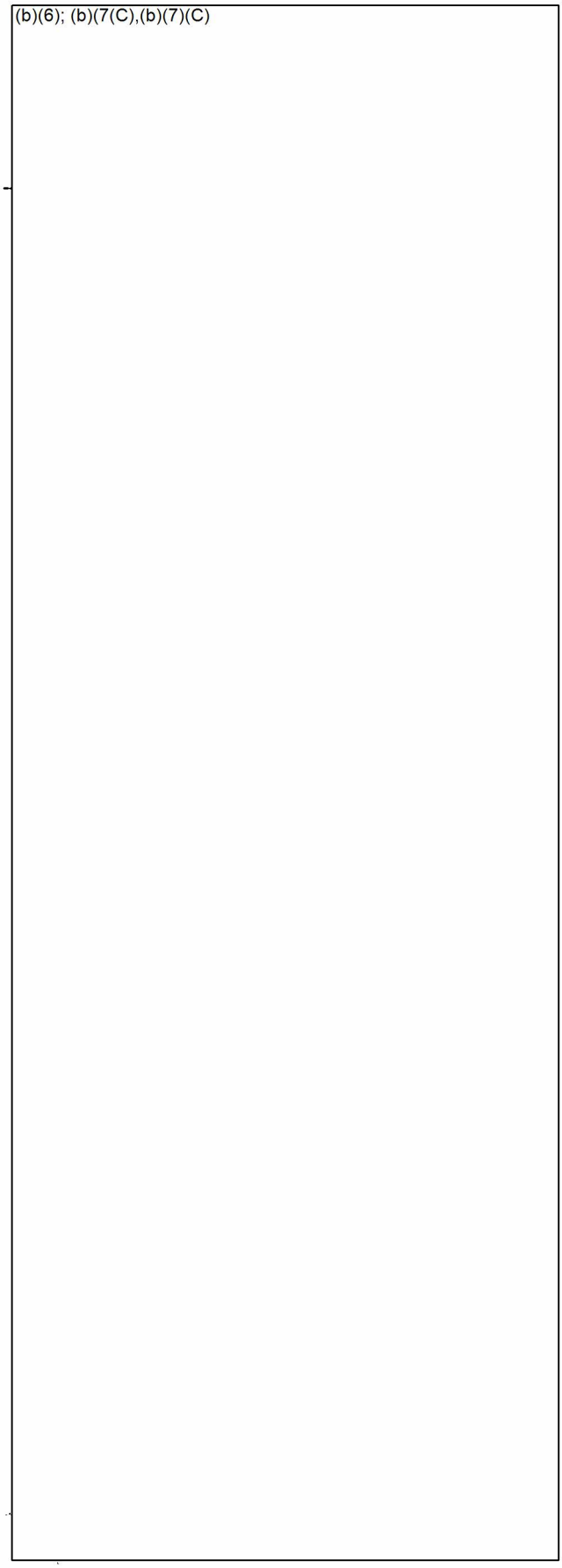
22.		
23.		
24.		
25.		
26.		
27.		
28.		
29.		
30.		

Appendix B
Stark State College Statistical Sample 2009/10

SSN	Last_Name	First_Name
(b)(6); (b)(7(C),(b)(7)(C)		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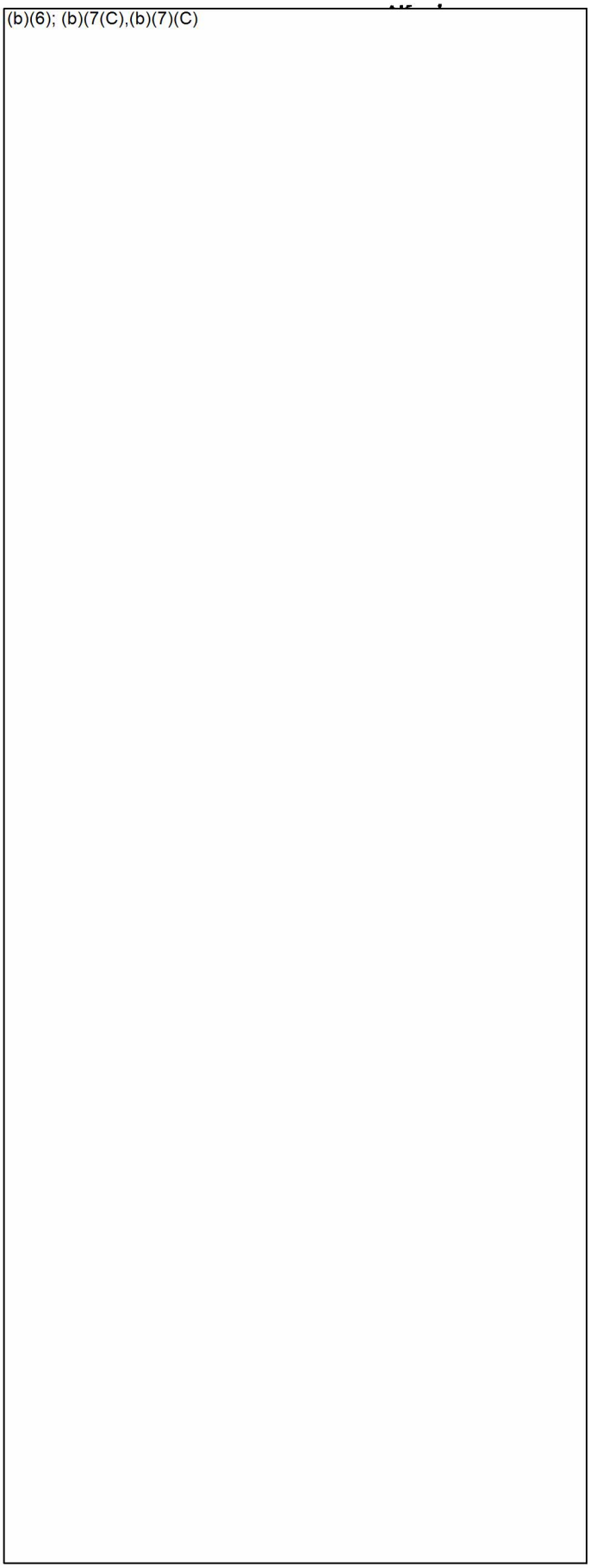
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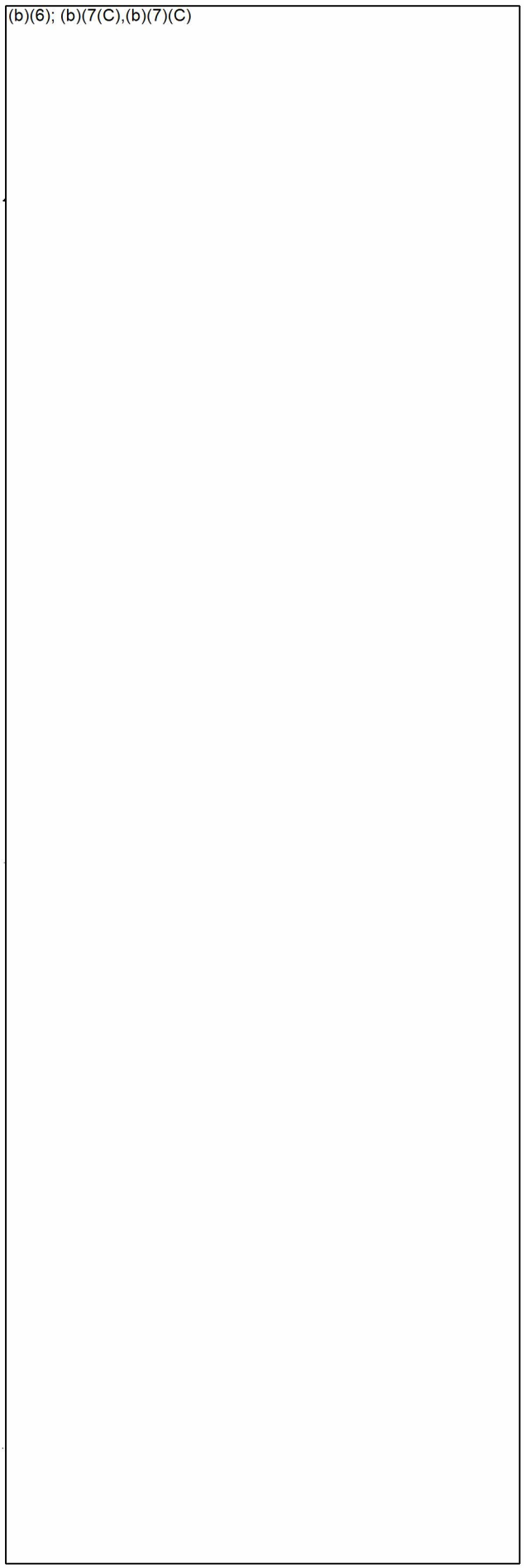
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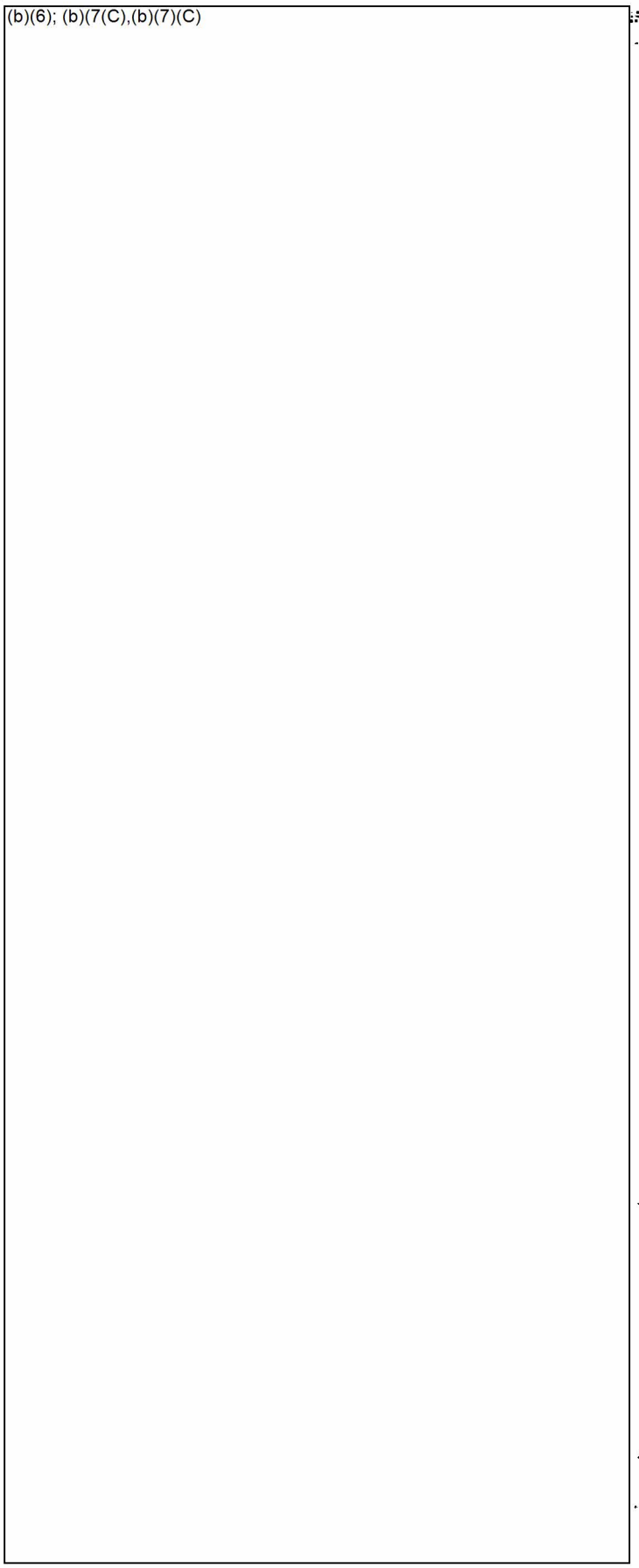
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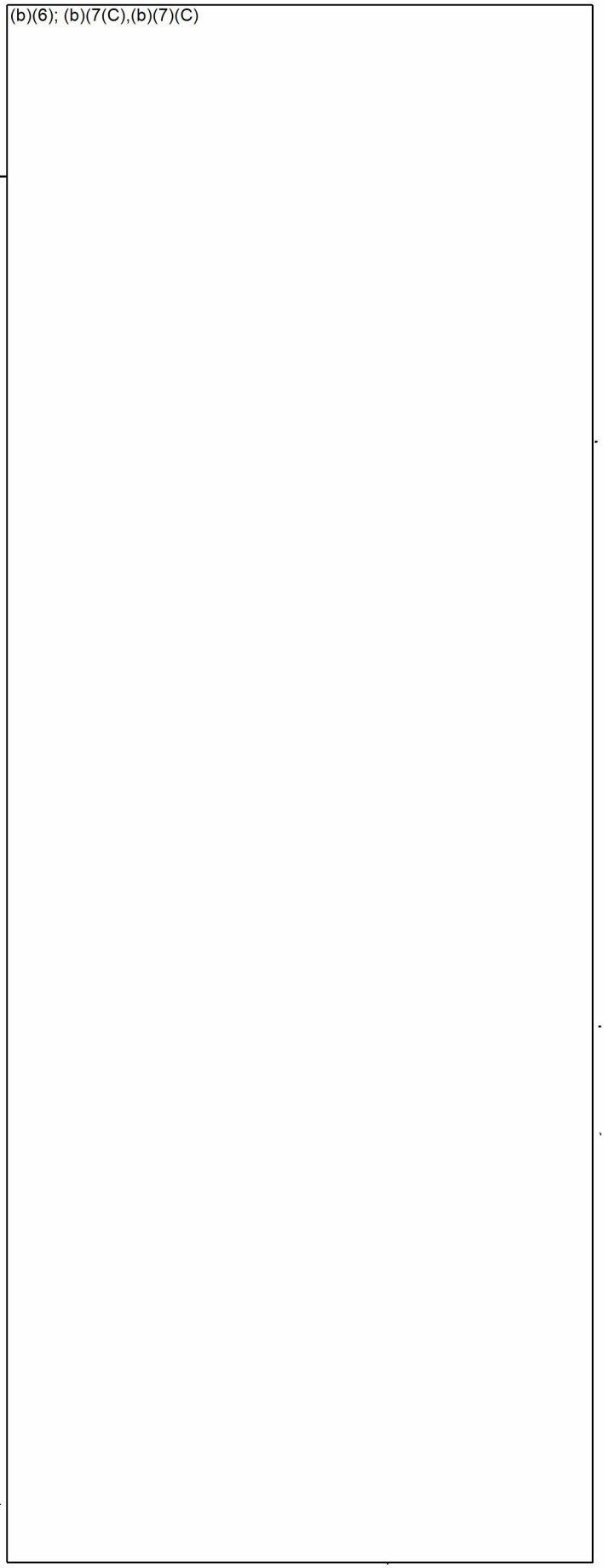
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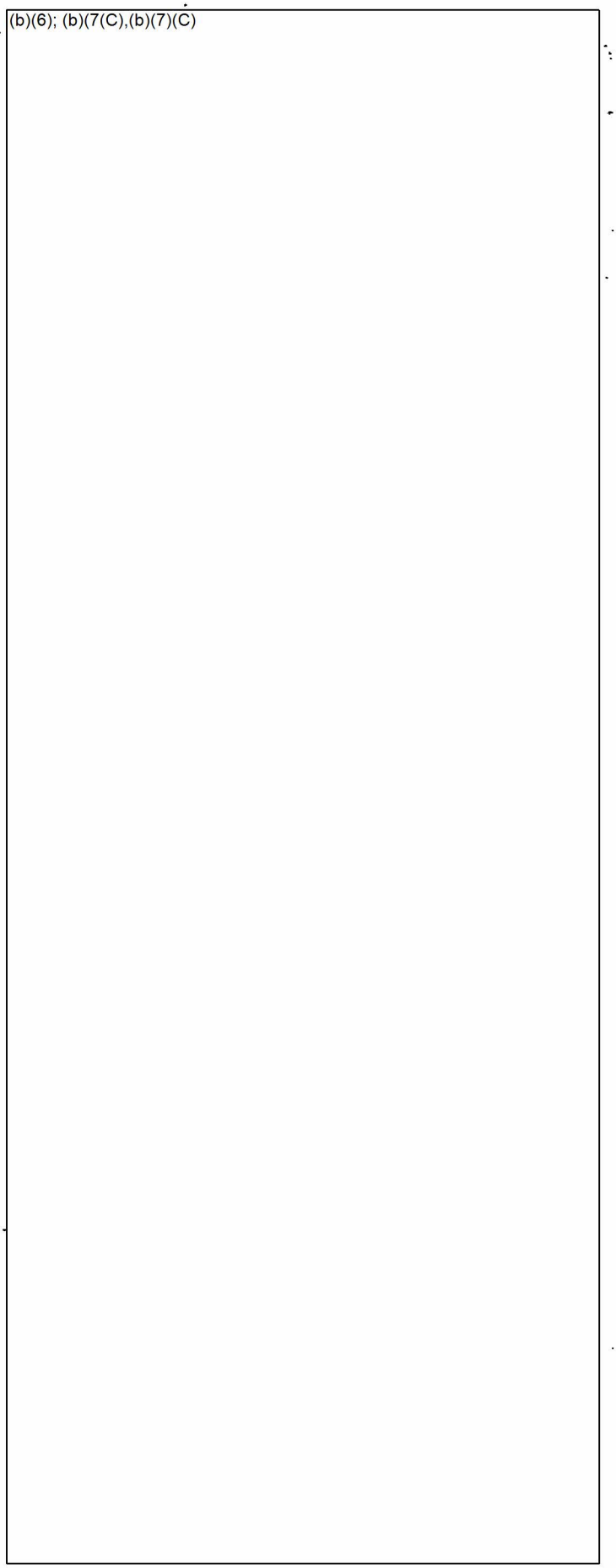
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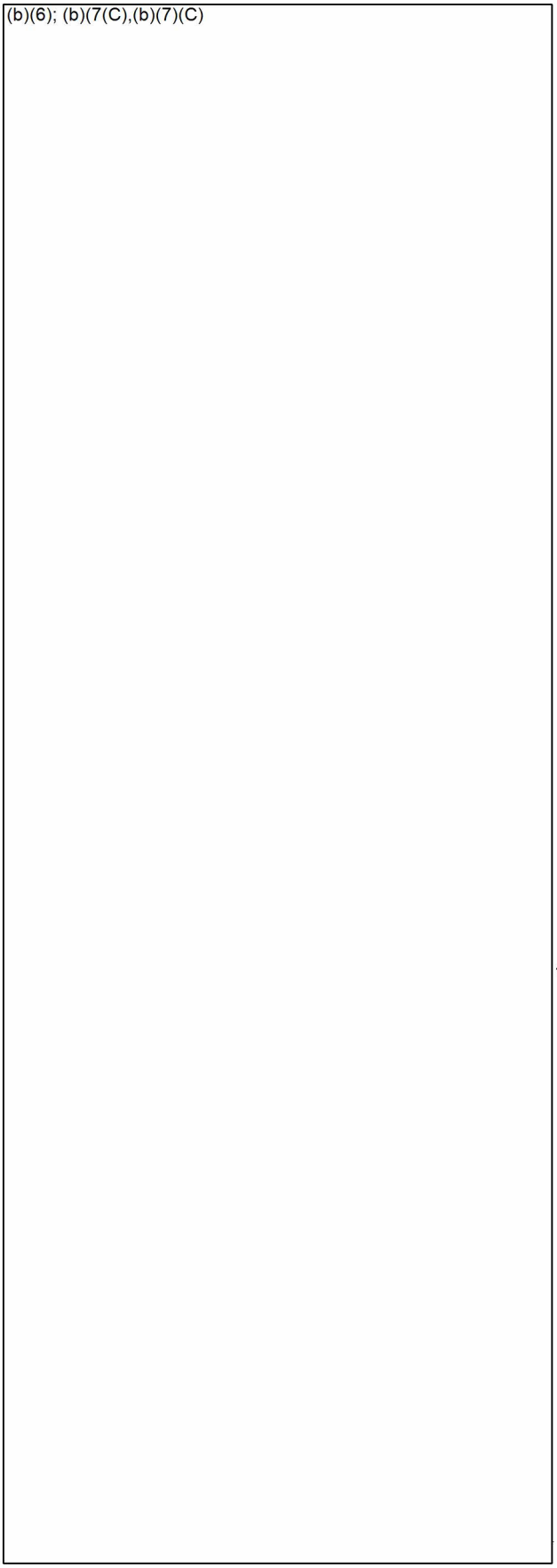
(b)(6); (b)(7(C),(b)(7)(C)

* The first 15 students in the statistical sample were reviewed by the on-site team; the school is not required to provide additional documentation for these students unless requested

Appendix C
Stark State College Statistical Sample 2010/11

SSN	Last_Name	First_Name
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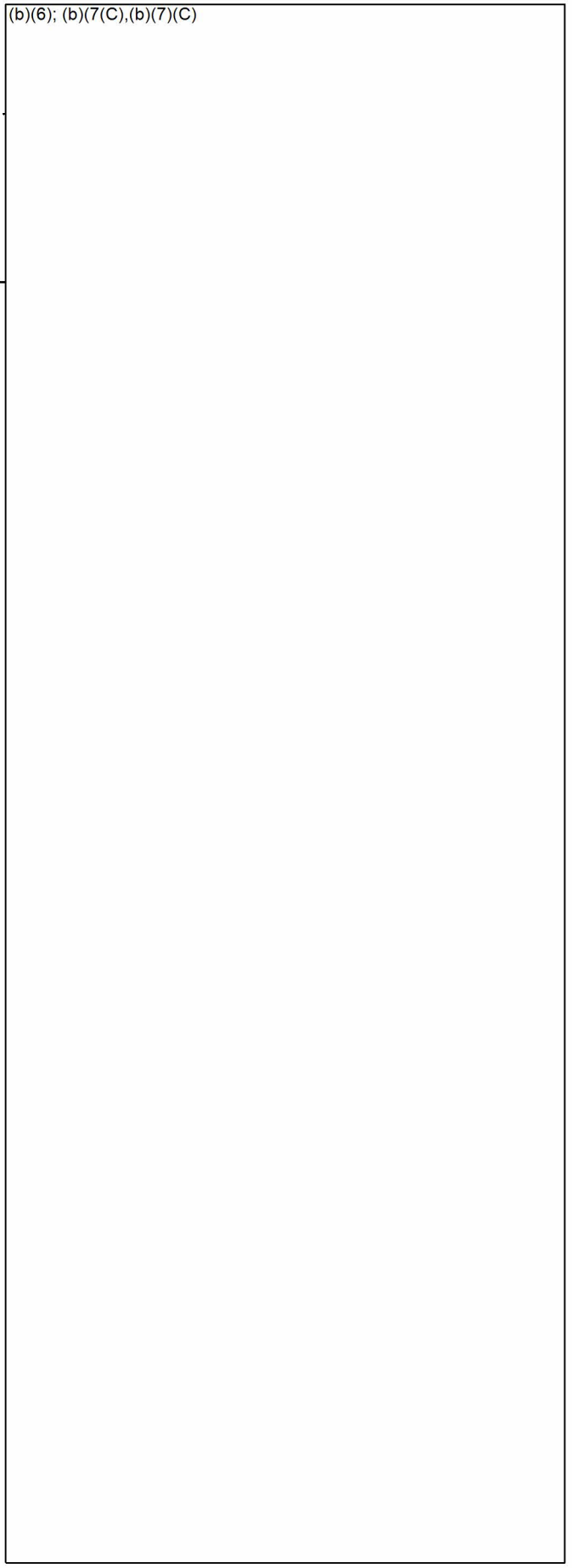
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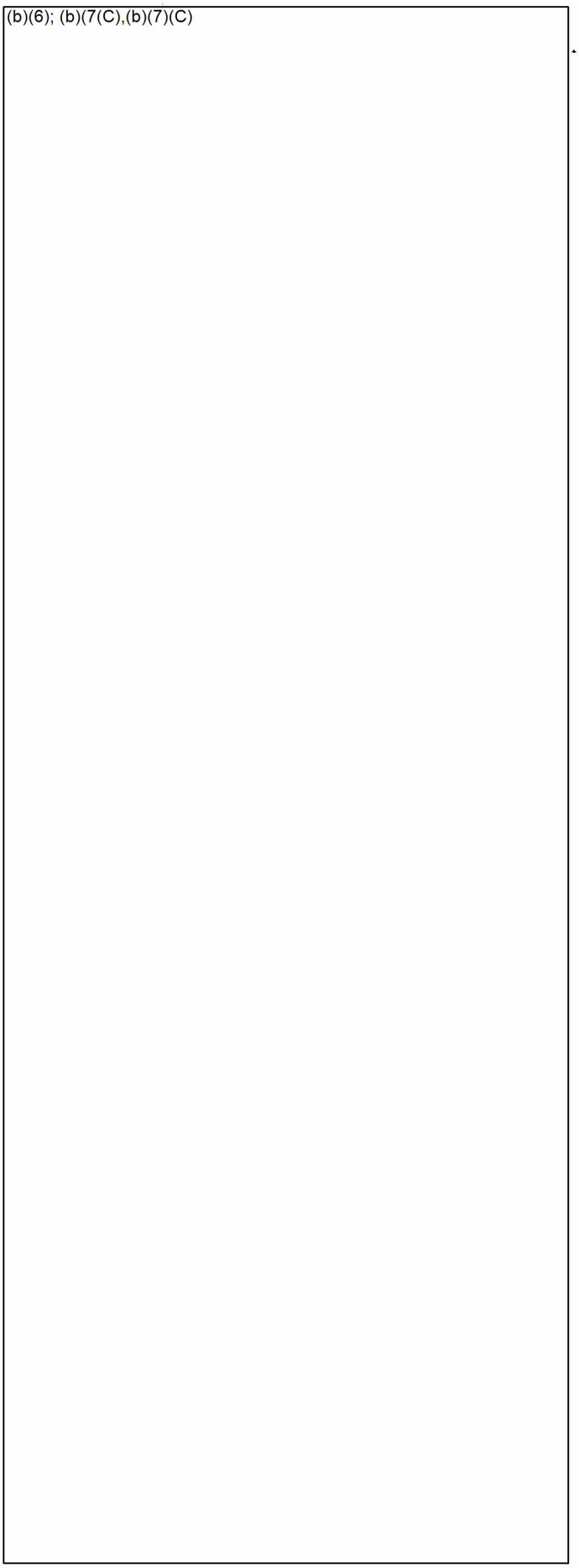
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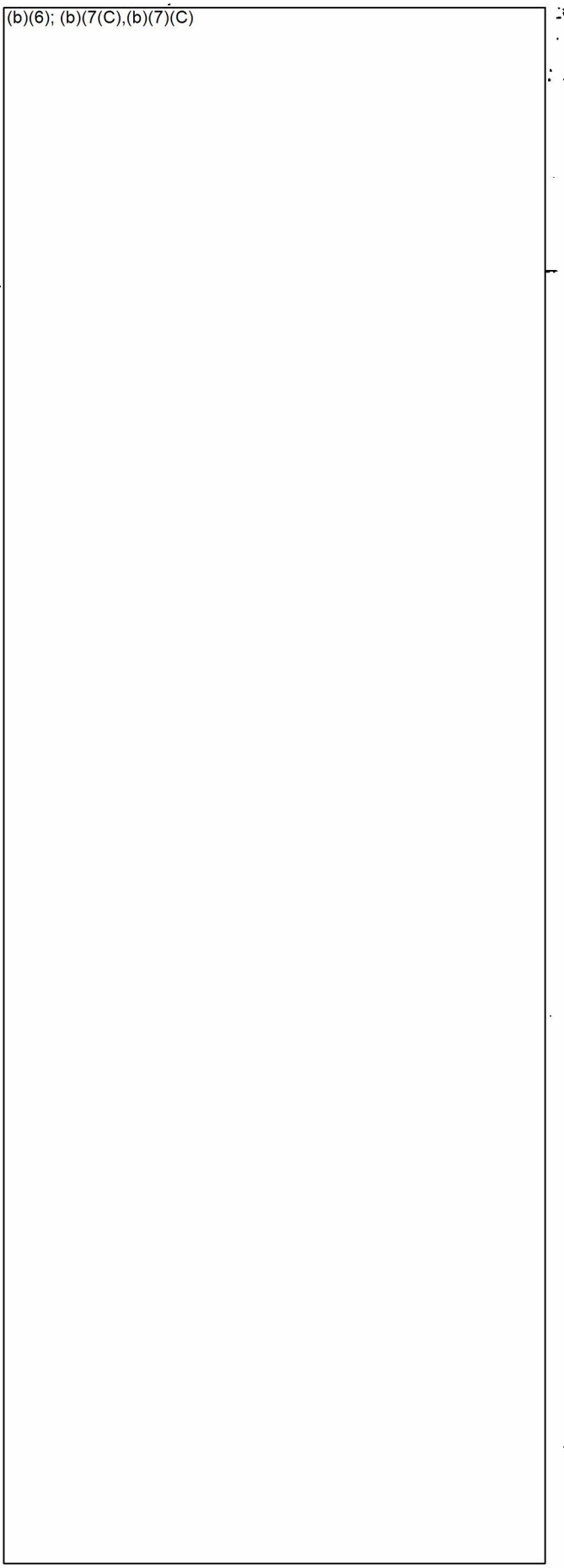
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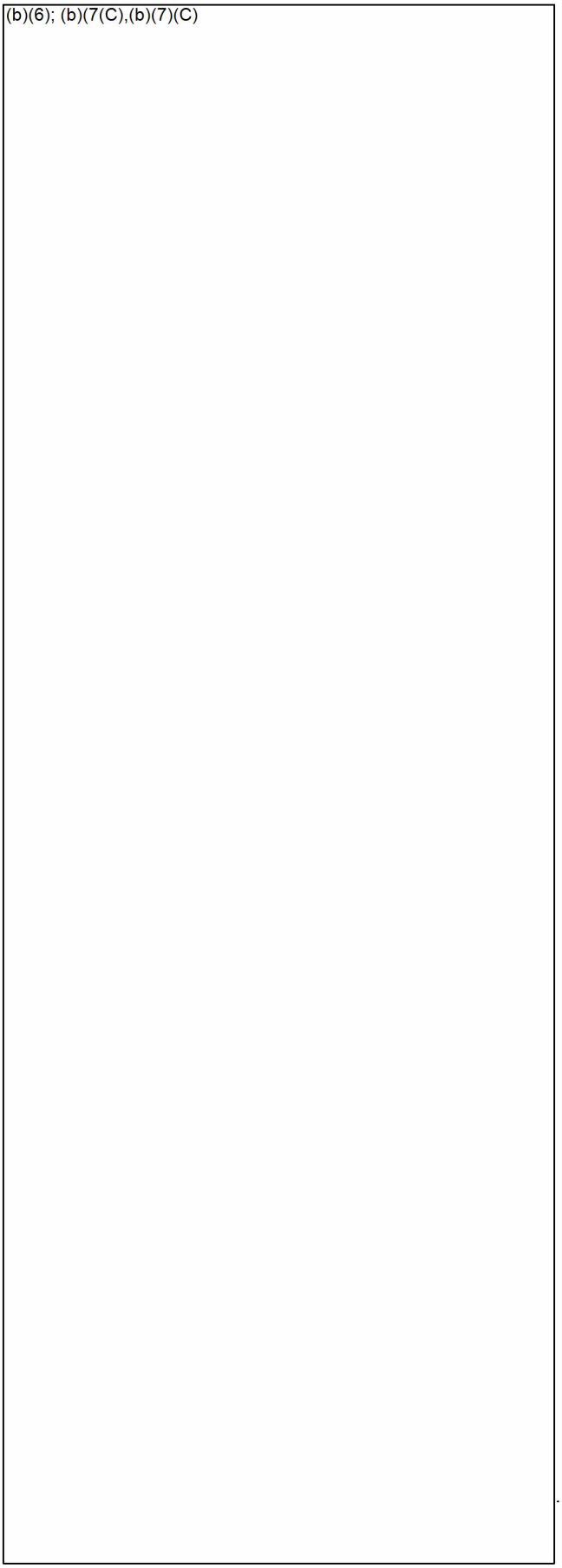
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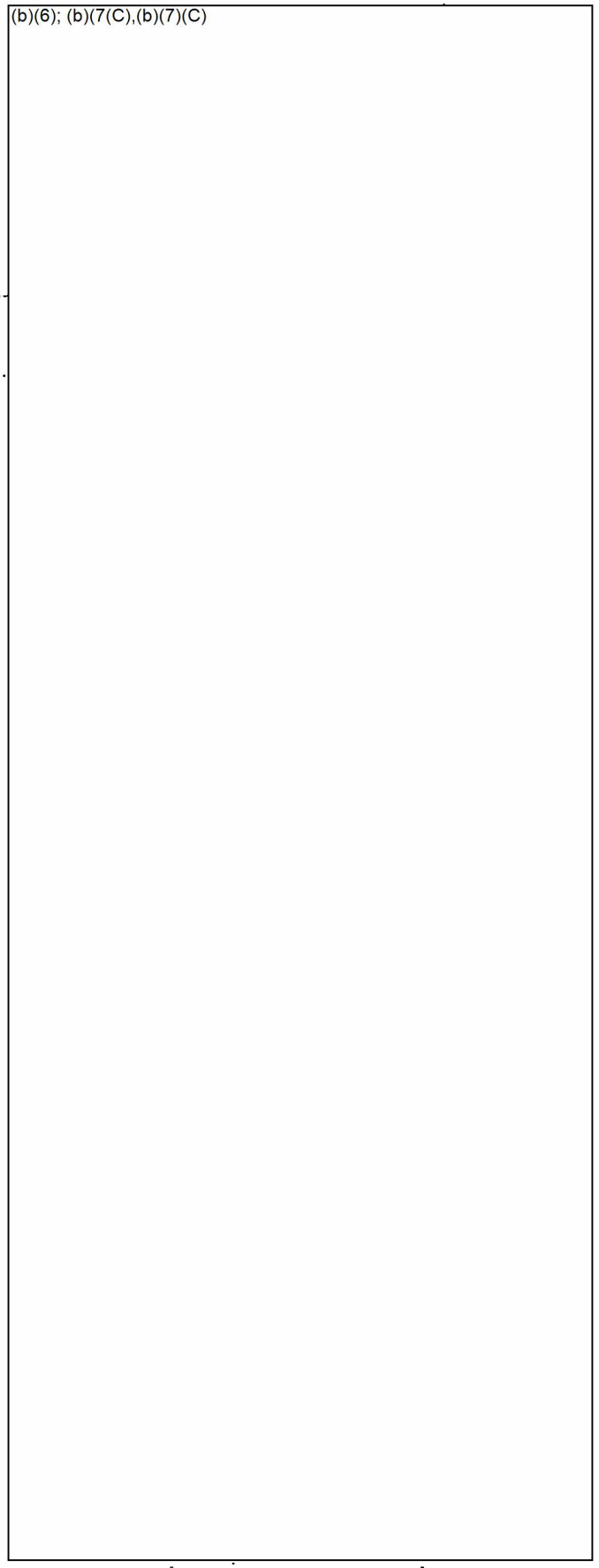
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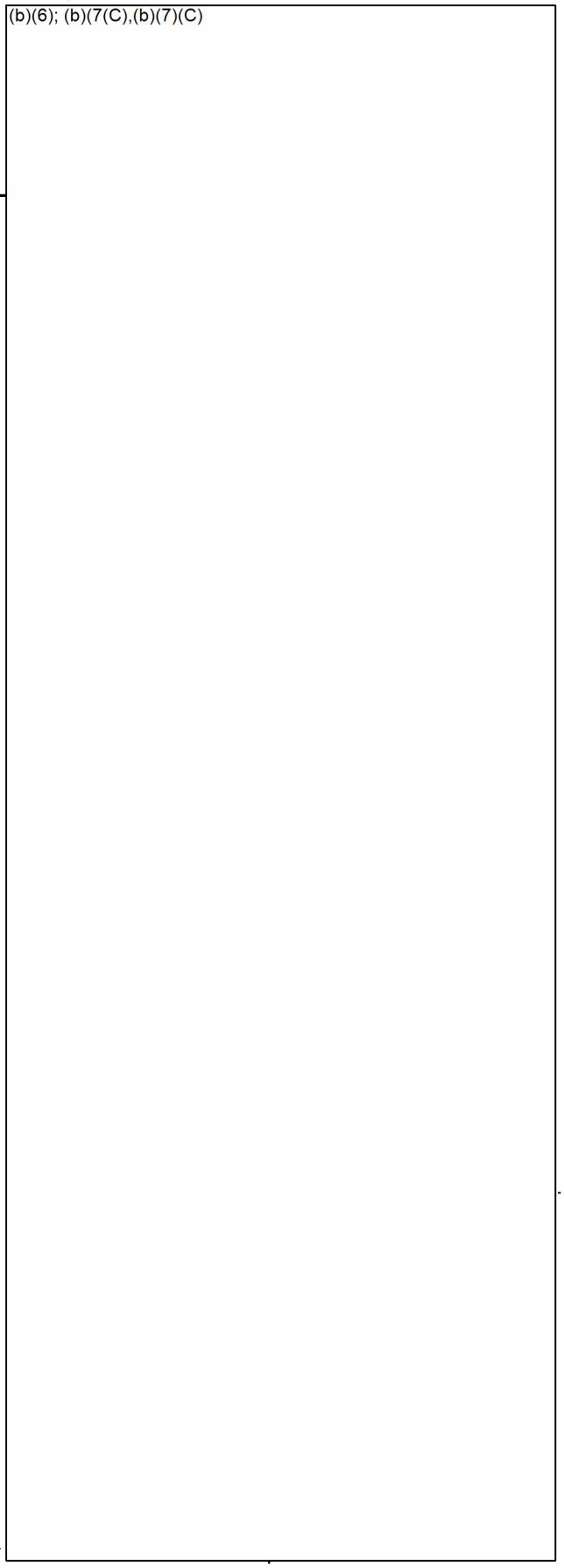
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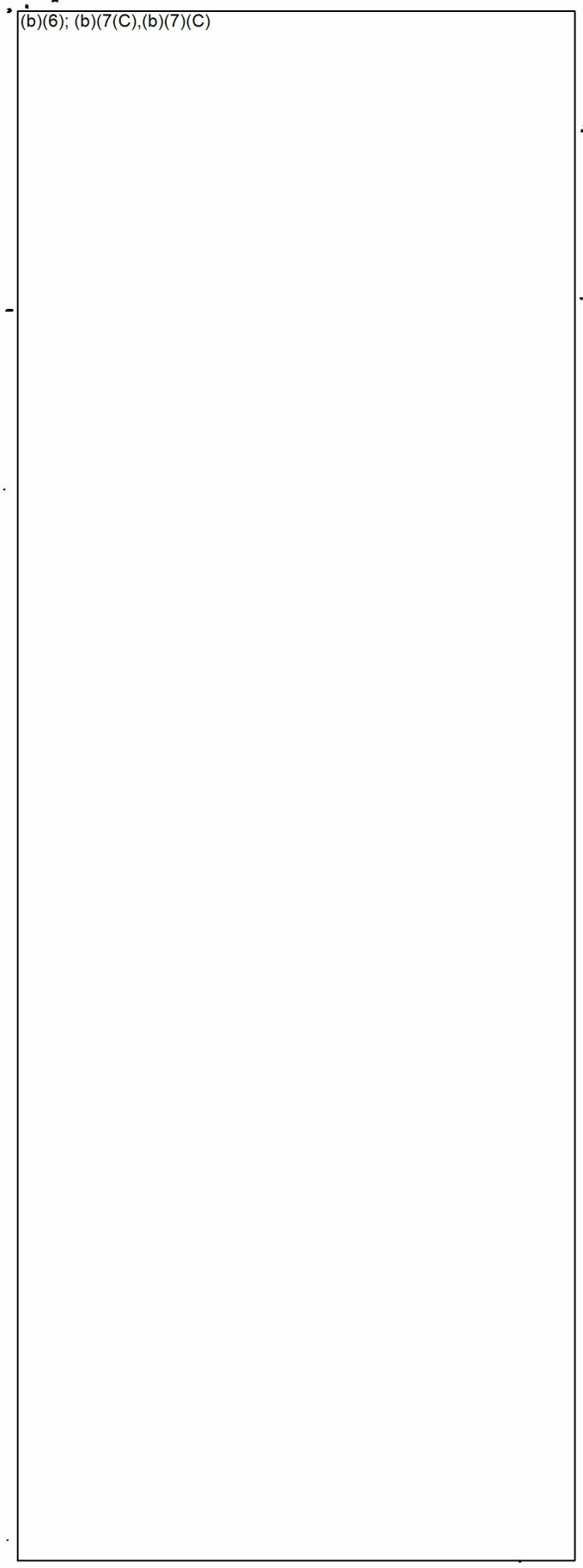

(b)(6); (b)(7(C),(b)(7)(C)

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

* The first 15 students in the statistical sample were reviewed by the on-site team; the school is not required to provide additional documentation for these students unless requested

STARK STATE COLLEGE

Changing Lives ... Building Futures

December 27, 2011

William Johnson
Federal Student Aid
School Participation Team – Chicago/Denver
U.S. Department of Education
500 West Madison Street
Chicago, Illinois 60661
William.Johnson@ed.gov

Re: Program Review Report, PRCN: 2011 305 27579

Dear Mr. Johnson,

Attached please find Stark State College's response to the Program Review Report issued on November 16, 2011 by the United States Department of Education, Federal Student Aid, School Participation Team – Chicago/Denver. For all of the reasons presented therein, Stark State College does not concur with Finding 1 set forth in the Program Review Report and seeks that this finding be seriously reconsidered.

We appreciate the opportunity to comment on the Program Review Report and reserve the right and opportunity to respond further to any final report as may be issued. Should you need any further information or clarification, please contact Cheryl Rice, Vice President for Student Services and Enrollment Management, Stark State College, 6200 Frank Avenue NW, North Canton, Ohio 44720.

Respectfully submitted,

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

Thomas Chiappini
Interim President

Stark State College
Response to Program Review Report: PRCN: 2011 305 27579

Submitted to:
Mr. William Johnson
Federal Student Aid
School Participation Team – Chicago/Denver
U.S. Department of Education
500 West Madison Street
Chicago, Illinois 60661

From May 2, 2011 through May 6, 2011, the United States Department of Education (ED or the Department) conducted a program review at Stark State College (Stark State) to determine Stark State's compliance with the statutes and federal regulations as they pertain to the institution's administration of Title IV, Higher Education Act (HEA) programs. 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.

The Program Review Report, PRCN 2011 305 27579, (Report), issued November 16, 2011, includes four initial findings. As detailed below, Stark State disagrees with the reviewers' conclusions under Finding 1. Stark State accepts the determinations for Findings 2 through 4 and agrees to comply with the requested corrective actions. The basis for Stark State's disagreement with Finding 1 is discussed below.

FINDING #1: Satisfactory Academic Progress (SAP) Standards Not Adequately Monitored

The Report mistakenly finds that three of the 30 files reviewed were not in compliance with Stark State's satisfactory academic progress (SAP) policy standards. As a result of this alleged noncompliance, ED concluded that the noncompliance was "extensive" and asked Stark State to complete a file review for all students for the two audit years. In fact, Stark State consistently and adequately applies its SAP policy standards. Of the 30 files reviewed, only one was out of compliance with the SAP policy standards - an error rate of just 3%.

Consistent with Department policies and standard practices, Stark State's single instance of noncompliance does not indicate a systemic issue and should not trigger a file review for all participants. *See Attachment A*, Program Review Guide, page III – 17, *available at* http://www.ifap.ed.gov/iposguidance/attachments/PRGall.pdf. ED's Program Review Guide specifically states:

> As previously noted, reviewers can require that an institution perform reviews of its records (file reviews) to ascertain the extent of a deficiency that appears to be systemic and material. Generally, an error rate of greater than 10 percent for

any given award year would signal a systemic problem.

Id. Further, ED applied its standard practices in determining not to request a file review for Findings 2 through 4. In Findings 2 and 3, only one instance of noncompliance was identified and in Finding 4, two instances of noncompliance were identified. Because the rate of noncompliance never exceeded 10%, ED did not find systemic issues and did not request comprehensive file reviews for Findings 2 through 4. Similarly, ED should not require a file review in Finding 1 as only one file out of 30 was noncompliant.

Stark State's SAP policy in effect during the award years of 2009-2010 and 2010-2011 required students to maintain an overall grade point average (GPA) of 2.0, a completion rate of 67% of the attempted credit hours (per term or cumulative), and successful completion of Ohio Board of Regents (OBR) approved degree or certificate within the number of hours listed in the catalog, multiplied by 150%. *See Attachment B*, Stark State SAP policy. If a student fails to meet the requirements of the SAP policy, Stark State notifies the student. After the first term in which requirements are not met, the student is placed on financial aid warning for one subsequent term. After the second term in which the requirements are not met, the student becomes ineligible for federal financial aid. ED does not dispute that Stark State's SAP policy meets the federal requirements in 34 C.F.R. §§ 668.16(e) and 668.34; ED's claim is that the SAP policy was not correctly applied.

Specifically, the Report alleges two students (#9 and #12) that should have been suspended received additional Title IV assistance during periods of ineligible financial aid enrollment, and one student (#26) had not been warned by Stark State of academic probation. Stark State agrees that student #9 was ineligible for aid after Fall 2008, and thus will comply with the return of funds for that student. Stark State disagrees, however, with the Report's determinations related to student #12 and student #26. Each student is discussed in turn below.

Student #26:

The Report erroneously found no documentation to indicate the student had been warned by Stark State of not making SAP. Stark State uses an electronic system to communicate with students regarding their financial aid status and eligibility. Specifically, when a student does not make SAP, the student is placed on financial aid probation and alerted to the status through email. Student #26 was placed on financial aid probation for the Spring 2011 term. Stark State notified the student by email of the probation (warning) on December 19, 2010.

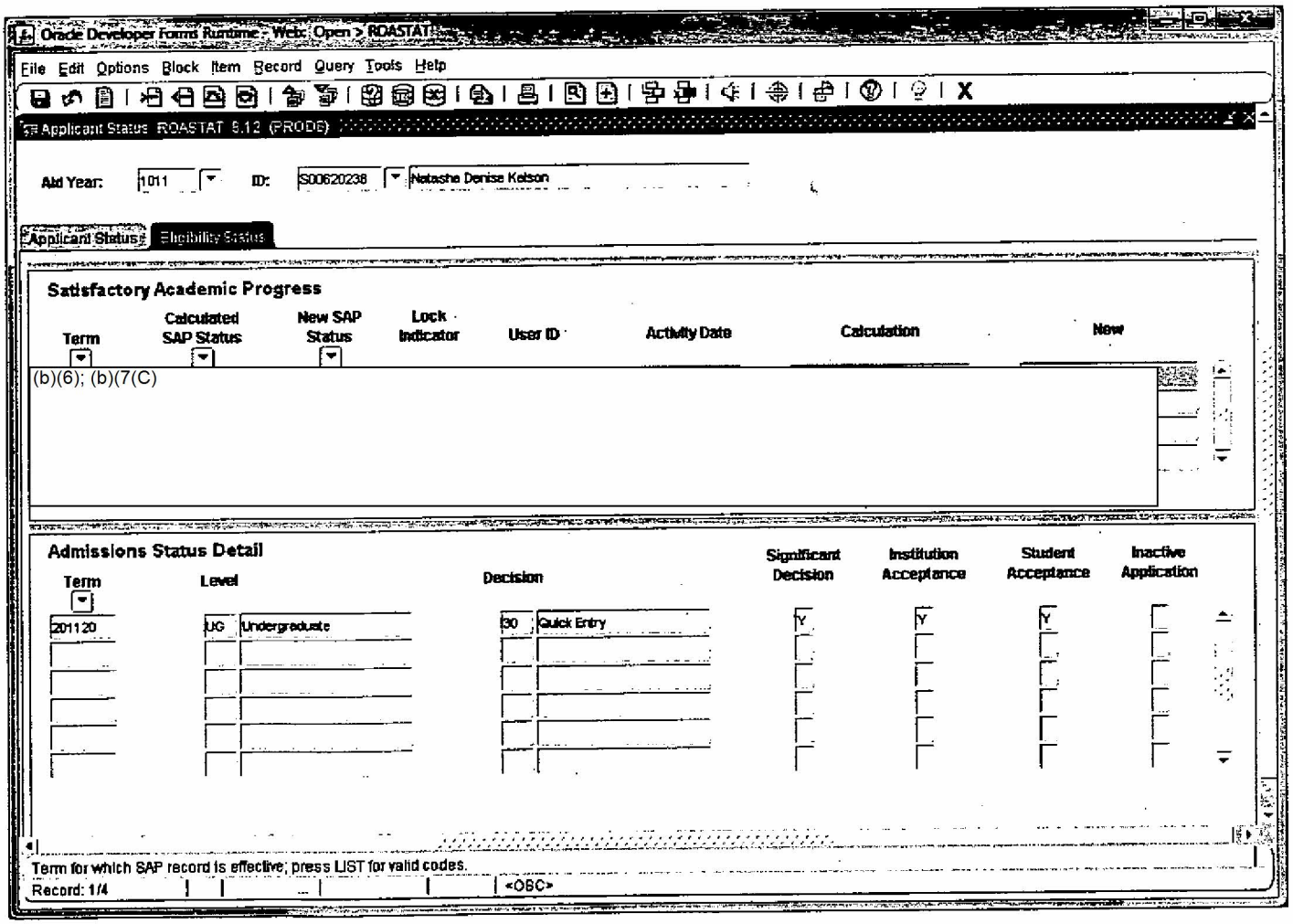
Stark State tracks student eligibility and academic progress using a web-based system. On the web-based system, students access secured, personal accounts that inform them of their financial aid eligibility status. A student's academic progress is measured at the end of each semester and the student's status is entered into the system as "Good" if the student met SAP; "Probation" if the student did not meet SAP for one semester; or "Terminated" if the student did not meet SAP for consecutive semesters.[1] An automated email alerts students about a change in eligibility status and directs students to check the status posted on their personal accounts. This is an

[1] In August 2011, Stark State changed its SAP policy to use the term "Warning" instead of "Probation" after a student did not meet SAP for one semester. This change was made in accordance with federal guidelines.

automated process that communicates the SAP status for the next semester of all participating students.

Because Stark State uses an electronic system, Stark State does not maintain paper documentation of the warnings students receive after not meeting SAP. Stark State can confirm a student was warned of not making SAP by accessing the web-based system. Below are a series of screen shots from the web-based system that demonstrate student #26 was warned of her probationary status on December 19, 2010.

A screen shot of student #26's SAP personal account is included below. The screenshot shows the student's SAP status for Fall 2010 (term 201120), Spring 2011 (term 201140), May 2011 (201210) and Fall 2011 (term 201220). The screenshot indicates that the student was on probation status as of Spring 2011 and financial aid was terminated as of May 2011.



As discussed above, at the end of each term, a process is run to calculate Satisfactory Academic Progress, consistent with Stark State's policy. The items included on the student's personal account screenshot are discussed below. Each number corresponds to the line identified by the numbers in red.

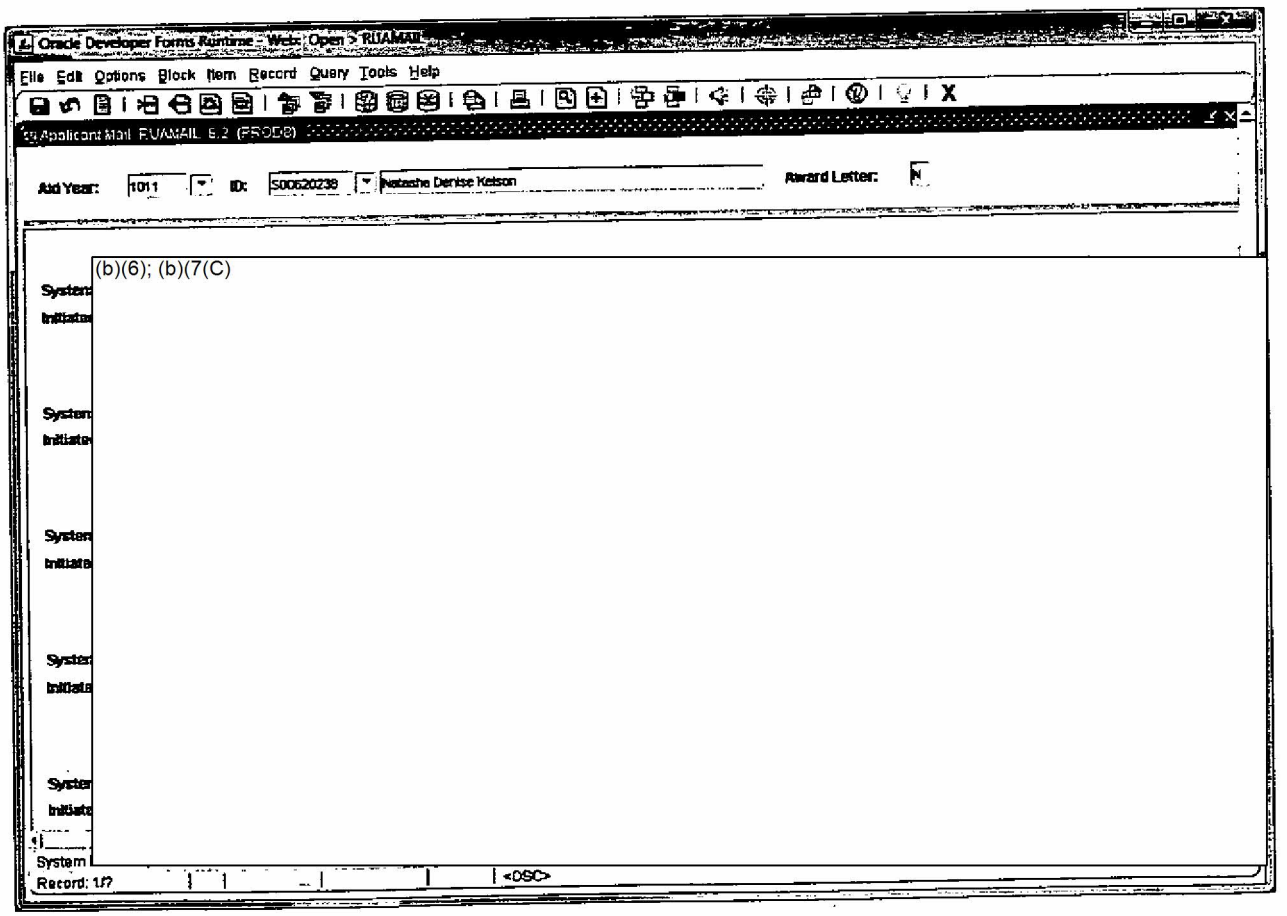
❶ The student's first term of attendance was Fall 2010 (201120), she is in Good (G) standing.

❷ At the end of the Fall 2010 term, when she did not meet the Standards of Academic Progress, the status was calculated at Probation (P1) which put her at a new SAP status of P1. This process was run on December 19, 2010 and the student's status was updated on the system the same day. The "activity date" in the screenshot above shows the last activity as having occurred on August 16, 2011 because Stark State ran a process on that date to change the terminology from "Probation" to "Warning" (WARN) due to a change in its policy, consistent with federal guidelines to incorporate proper wording for SAP. In essence, the terms Warning and Probation are interchangeable.

❸ At the end of Spring 2011 (201140), the student again did not meet SAP and was placed in a terminated status as of May 18, 2011.

❹ For the Fall 2011 (201220), the student filed an appeal, and it was approved.

Again, students receive automated emails alerting them of changes in their eligibility status. The next screenshot summarizes all of the status update notifications that the student received. As demonstrated below, the student was notified by email of ❶ the Probation (Warning) on December 19, 2010 and ❷ the termination on May 20, 2011:



Student #26 received an email notifying her of the updated status on December 19, 2010. The automated email communication is generated after the SAP status is updated to notify the student of his or her new status. The email that student #26 received on December 19, 2010 to notify her that she was on probation (warning) status after not meeting SAP is included below:

ID: <ROVFAID_ID>

Dear: <ROVFAID_FIRST_NAME>:

At the end of each term, the financial aid office reviews every student's academic progress to ensure progression toward a degree and continued eligibility for financial aid.

Based on this review, your academic progress status has been updated.

To view your updated status, please visit the mystarkstate portal. Your new status can be found on the 'Academic Progress' link under the 'My Stuff' tab.

If your status is at Good or Probation OR Warning, you will continue to receive financial aid for the upcoming term. If your status is Terminated, your aid has been suspended.

You have two options when your status is terminated: you may file an appeal or complete a semester at your own expense.

If your SAP status is at Maximum Time frame, you must submit an appeal along with an academic plan signed by your advisor, outlining the classes you still need to complete to graduate.

If you have previously submitted an appeal for Maximum Time Frame, you do not need to submit a new one unless there have been changes to your academic plan.

If you have any questions regarding your status, please contact the financial aid office at 330-494-6170, Ext. 4301.

Accordingly, on December 19, 2010 student #26 was notified that her eligibility status had been updated and directed to check her new status on her personal account. As demonstrated by the screenshots above, the student's personal account indicated that she was on probation (warning) status for the Spring 2011 semester.

The Report erred in finding that student #26 was not put on academic probation for the Spring 2011 semester. The student was not only put on probation, but also was warned by Stark State of not making SAP on December 19, 2010. *See Attachment C*, Affidavit of Amy Smucker.

Student #12:

The Report mistakenly found that student #12 was ineligible for Title IV aid beginning the Summer 2009 semester onwards because she did not make SAP, according to the policy in effect at that time. According to the Report, the student's completion rate was 50% after the Spring

2008 semester and was 57% after the Spring 2009 semester. In fact, the student never fell below the 67% cumulative hours completed required to demonstrate SAP.

The discrepancy in the student's completion rate is due to the fact that the student repeated certain courses that the student had previously passed and received credit for in order to improve a grade. When a student repeats a course at Stark State, the credit hours are only recorded on the most recent semester for which the student completed the course. The transcripts ED reviewed did not include the courses the student completed and passed each semester, but only the completed courses that were not later repeated.

For example, in the Summer 2009 semester, the student completed and passed all 9 attempted credit hours. The student received Bs in Effective Speaking (3 credit hours) and Cultural Diversity (3 credit hours), and a C in Medical Terminology (3 credit hours). However, the student later retook Medical Terminology in the Spring 2011 and received an A. Thus, despite having completed and passed all 9 attempted hours in the Summer 2009, the transcripts ED reviewed showed completion of only 6 of the 9 credit hours due to the fact that Medical Terminology was repeated in a subsequent semester. *See Attachment D*, Student #12 Transcripts.

A breakdown of the student's actual completion rate is provided below:

Term	Hours Completed	Hours Attempted	Cumulative Hours Completed	Cumulative Hours Attempted	%
Fall 2008	10	14	10	14	71.4%
Spring 2009	12	12	22	26	84.6%
Summer 2009	9	9	31	35	88.6%
Fall 2009	7	7	38	42	90.5%
Spring 2010	7	13	45	55	81.8%
Summer 2010	8	8	53	63	84.1%
Fall 2010	0	13	53	76	69.7%
Spring 2011	10	13	63	89	70.8%

The student did not fail to meet Stark State's progress standards for two consecutive semesters, and thus remained eligible for the Title IV funds disbursed to her for the Summer 2009, Fall 2009, Spring 2010, Summer 2010, Fall 2010, and Spring 2011 semesters. The treatment of a repeated course for SAP purposes is up to the institution. *See* 34 C.F.R. 668.34; *see also* Non-Regulatory Guidance, Program Integrity Questions and Answers – Satisfactory Academic Progress, SAP-Q8, issued August 26, 2011. Under Stark State's policy, Stark State includes passed courses in the calculation of the student's completion rate, even if the course is later repeated to improve the student's grade.

Stark State correctly applied the SAP policy to students #26 and #12. Only with respect to student #9, did Stark State fail to correctly apply the SAP policy. A single instance of noncompliance out of 30 files reviewed does not indicate an "extensive" issue. As such, Stark State should not be required to perform a full file review. ED's established practices require a full file review when ED finds noncompliance in 10% or more of the files selected for review. Here, ED selected 30 files for review and determined three files did not conform to federal requirements - only just meeting the 10% threshold for a full file review.

However, as Stark State has demonstrated above, ED erred in finding noncompliance in two of the three files. The single instance of noncompliance does not indicate a systemic issue and does not meet the threshold to trigger a full file review. Even if ED finds that two of the 30 files were noncompliant (as it did in Finding 4), the error rate is still well-below the 10% threshold and would not trigger a full file review. For these reasons, Stark State requests that ED not require the full file review, but rather only hold Stark State accountable for the single instance of noncompliance.

With regard to Findings 2, 3 and 4, Stark State agrees to comply with the requested return of funds and all corrective actions, including developing adequate procedures to ensure accurate reporting to Automated Clearing House and ensuring that exit counseling is performed on a timely basis. Stark State appreciates the opportunity to provide its comments in response to the Program Review Report.

STUDENT #12

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

Student AcademicTranscript

Dec 06, 2011 04:40 pm

This is not an official transcript. Courses which are in progress may also be included on this transcript.

Information for (b)(6); (b)(7(C)

Institution Credit Transcript Totals Courses in Progress

Transcript Data

STUDENT INFORMATION

Name : (b)(6); (b)(7(C),(b)(7)(C)
Birth Date:
Student Type: Continuing

Curriculum Information

Current Program
Associate in Applied Science
Program: Pre-Nursing_AAS
College: SSCT-Credit
Major and Department: Pre-Nursing, Nursing

***Transcript type:Advising Transcript is NOT Official ***

DEGREE AWARDED

Sought: Associate in Applied Science **Degree Date:**

Curriculum Information

Primary Degree
Program: Pre-Nursing_AAS
College: SSCT-Credit
Major: Pre-Nursing

❶ As part of the transcript process, if a student repeats a course, both grades appear on the academic record and the most recent grade will be used in calculating the grade point average.

This process also excludes the credit hours from the cumulative passed hours total, which is used to calculate the quantitative component of SAP.

❷ The repeat is evidenced with an "E" to exclude that grade from the GPA and an "I" to the repeated course grade.

INSTITUTION CREDIT -Top-

Term: Fall 2008
Major: Pre-Nursing
Academic Standing: Good Standing

Subject	Course	Campus	Level	Title	Grade	Credit Hours	Quality Points	Start and End Dates	R
BIO	101	Main	UG	INTRO TO ANAT AND PHYSIO	C	3.000	6.00		
ENG	124	Main	UG	COLLEGE COMPOSITION	D	3.000	0.00		E
IDS	102	Main	UG	CRITICAL ANALYSIS	NC	4.000	0.00		

MTH	101	Main	UG	INTRODUCTION TO ALGEBRA	B	4.000	0.00	E

Term Totals (Undergraduate)

	Attempt Hours	Passed Hours	Earned Hours	GPA Hours	Quality Points	GPA
Cumulative:	14.000	~~3.000~~ 10.000	3.000	3.000	6.00	2.000

71.4% completion

Unofficial Transcript

Term: Spring 2009

Major: Pre-Nursing

Academic Standing: Probation

Subject	Course	Campus	Level	Title	Grade	Credit Hours	Quality Points	Start and End Dates	R
BCA	120	Main	UG	BUSINESS COMPUTER APPLICATIONS	D	4.000	0.00		E
BUS	121	Main	UG	BUSINESS ADMINISTRATION	C	4.000	8.00		
CHM	101	Main	UG	INTRO TO CHEMISTRY	C	4.000	8.00		

Term Totals (Undergraduate)

	Attempt Hours	Passed Hours	Earned Hours	GPA Hours	Quality Points	GPA
Cumulative:	26.000	~~11.000~~ 22.000	11.000	11.000	22.00	2.000

84.6% completion

Unofficial Transcript

Term: Summer 2009

Major: Pre-Nursing

Academic Standing: Good Standing

Subject	Course	Campus	Level	Title	Grade	Credit Hours	Quality Points	Start and End Dates	R
BIO	125	Main	UG	MEDICAL TERMINOLOGY	C	3.000	0.00		E
COM	121	Downtown Canton	UG	EFFECTIVE SPEAKING	B	3.000	9.00		
SOC	225	Main	UG	CULTURAL DIVERSITY	B	3.000	9.00		

Term Totals (Undergraduate)

	Attempt Hours	Passed Hours	Earned Hours	GPA Hours	Quality Points	GPA
Cumulative:	35.000	~~17.000~~ 31.000	17.000	17.000	40.00	2.353

88.6% completion

Unofficial Transcript

Term: Fall 2009

Major: Pre-Nursing
Academic Standing: Good Standing

Subject	Course	Campus	Level	Title	Grade	Credit Hours	Quality Points	Start and End Dates	R
ENG	124	Main	UG	COLLEGE COMPOSITION	D	3.000	0.00		E
IDS	102	Main	UG	CRITICAL ANALYSIS	B	4.000	12.00		I

Term Totals (Undergraduate)

	Attempt Hours	Passed Hours	Earned Hours	GPA Hours	Quality Points	GPA
Cumulative:	42.000	~~21.000~~ 38.000	21.000	21.000	52.00	2.476

90.5% completion

Unofficial Transcript

Term: Spring 2010
Major: Pre-Nursing
Academic Standing: Good Standing

Subject	Course	Campus	Level	Title	Grade	Credit Hours	Quality Points	Start and End Dates	R
BCA	120	Main	UG	BUSINESS COMPUTER APPLICATIONS	C	4.000	0.00		E
ENG	124	Main	UG	COLLEGE COMPOSITION	C	3.000	6.00		I
PSY	123	Main	UG	HUMAN GROWTH AND DEVELOP	W	0.000	0.00		
SOC	121	Main	UG	SOCIOLOGY	W	0.000	0.00		

Term Totals (Undergraduate)

	Attempt Hours	Passed Hours	Earned Hours	GPA Hours	Quality Points	GPA
Cumulative:	55.000	~~24.000~~ 45.000	24.000	24.000	58.00	2.417

81.8% completion

Unofficial Transcript

Term: Summer 2010
Major: Pre-Nursing
Academic Standing: Good Standing

Subject	Course	Campus	Level	Title	Grade	Credit Hours	Quality Points	Start and End Dates	R
OTA	223	Main	UG	LIFE SPAN DEVELOPMENT	C	5.000	10.00		
SOC	121	Main	UG	SOCIOLOGY	A	3.000	12.00		I

Term Totals (Undergraduate)

	Attempt Hours	Passed Hours	Earned Hours	GPA Hours	Quality Points	GPA
Cumulative:	63.000	~~32.000~~ 53.000	32.000	32.000	80.00	2.500

84.1% completion

Unofficial Transcript

Term: Fall 2010
Major: Pre-Nursing
Academic Standing: Good Standing

Subject	Course	Campus	Level	Title	Grade	Credit Hours	Quality Points	Start and End Dates	R
BCA	120	Main	UG	BUSINESS COMPUTER APPLICATIONS	W	0.000	0.00		
BIO	125	Main	UG	MEDICAL TERMINOLOGY	F	3.000	0.00		E
SOC	222	Main	UG	JUVENILE DELINQUENCY	W	0.000	0.00		
SWK	126	Advanced Technology Center	UG	HUMAN BEHAVIOR & SOC ENV	W	0.000	0.00		

0 hours completed

Term Totals (Undergraduate)

	Attempt Hours	Passed Hours	Earned Hours	GPA Hours	Quality Points	GPA
Cumulative:	76.000	~~32.000~~ 53.000	32.000	32.000	80.00	2.500

69.7% completion

Unofficial Transcript

Term: Spring 2011
Major: Pre-Nursing
Academic Standing: Good Standing

Subject	Course	Campus	Level	Title	Grade	Credit Hours	Quality Points	Start and End Dates	R
BCA	120	Main	UG	BUSINESS COMPUTER APPLICATIONS	A	4.000	16.00		I
BIO	125	Main	UG	MEDICAL TERMINOLOGY	A	3.000	12.00		I
SOC	222	Main	UG	JUVENILE DELINQUENCY	W	0.000	0.00		
SWK	126	Advanced Technology Center	UG	HUMAN BEHAVIOR & SOC ENV	D	3.000	3.00		

Term Totals (Undergraduate)

	Attempt Hours	Passed Hours	Earned Hours	GPA Hours	Quality Points	GPA
Cumulative:	89.000	~~42.000~~ 63.000	42.000	42.000	111.00	2.643

70.8% completion

Unofficial Transcript

DC

November 16, 2011

Thomas Chiappini
Stark State College
6200 frank Avenue Northwest
North Canton, Ohio 44720

Certified Mail
Return Receipt Requested
Domestic Return Receipt
7011 1570 0000 7495 6728

RE: Program Review Report
OPE ID: 010881
PRCN: 2011 305 27579

Dear President Chiappini:

From May 2, 2011 through May 6, 2011, Oksana Apanovich, Clare Barger and William Johnson conducted a review of Stark State College's (Stark State) 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 Stark State. The response should include a brief, written narrative for each finding that clearly states Stark State's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, Stark State 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 report[1] and relevant materials related to the report before any final program review report is issued;
(2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination –
    a. A written statement addressing the institution's response;
    b. A written statement of the basis for such report or determination; and
    c. A copy of the institution's response.

The Department considers the institution's response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution's written response will not be attached to the FPRD. However, it will be retained and available for inspection by Stark State 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 William Johnson of this office within 60 calendar days of receipt of this letter.

Protection of Personally Identifiable Information (PII):

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the findings in the attached report do not contain any student PII. Instead, each finding references students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Student Sample. In addition, Appendices B and also contain PII. These appendices were encrypted and sent separately to the institution via e-mail. Please see the enclosure Protection of Personally Identifiable Information for instructions regarding submission to the Department of required data / documents containing PII.

Record Retention:

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

[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).

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 William Johnson at 312-730-1526 or William.Johnson@ed.gov.

Sincerely,

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

Earl Flurkey
Team Leader

cc: John O'Donnell, Financial Aid Administrator

Enclosure:
Protection of Personally Identifiable Information