

Appendix A: Student Sample

2012-13 and 2013-14 Award Years

Student #	Last Name	First Name	SSN
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December 6, 2013

Dr. Michael Harter
Senior Provost & CEO
Touro University
1310 Club Drive
Vallejo, CA 94592

Certified Mail
Return Receipt Requested
#: 70070710000106750498

RE: Expedited Final Program Review Determination Letter
OPE ID: 04142600
PRCN: 201410928454

Dear Dr. Harter:

From November 18, 2013 through November 22, 2013, Tracy Simmonds and Rick Allen conducted a review of Touro University's (Touro's) administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). The purpose of this Final Program Review Determination Letter is to close the program review.

A sample of 34 files was identified for review from the 2012-2013 and 2013-2014 award years. The names and social security numbers of the students whose files were examined during the program review are set forth on Appendix A to this Final Program Review Determination 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. Appendix A was encrypted and sent separately to the institution via e-mail.

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

The San Francisco/Seattle School Participation Division has made a Final Program Review Determination concerning the findings that were identified during the program review. Following is a discussion of the findings identified and the resolution of those findings.

Federal Student Aid

An OFFICE of the U.S. DEPARTMENT of EDUCATION
50 Beale Street, Suite 9800, San Francisco, CA 94105-1863

Program Review Finding and Final Program Review Determination:

Finding 1: Unprotected Personally Identifiable Information (PII) in Student Files

Citation: Institutions are required to protect the personally identifiable information of students in accordance with the Family Education Rights and Privacy Act of 1974 and implementing regulations. 34 C.F.R. Part 99. Additionally, the Secretary considers any breach to the security of student records and information as a potential lack of administrative capability with respect to safeguarding and protecting the confidentiality of customer information.

To begin and to continue to participate in any Title IV, HEA program, an institution shall demonstrate to the Secretary that the institution is capable of adequately administering that program. The Secretary considers an institution to have that administrative capability if the institution administers Title IV, HEA programs with adequate checks and balances in its system of internal controls. 34 C.F.R. § 668.16.

Noncompliance: The reviewers found a “Candidates for College Class - Committee Meeting” spreadsheet listing with details of multiple students’ data (i.e. name, email address, gender, ethnicity, GPA, prior college attended, date degree obtained and major, interviewers’ names along with ranking scores) in the individual academic files of Students ## 3, 10, 15, 18, 20, 26, 27 and 29.

Institutional Action Taken to Resolve Noncompliance: Touro’s Office of Admissions and Office of the Registrar reviewed its current and prospective student files and all documents containing PII (including the “Candidates for College Class – Committee Meeting” spreadsheet listing) were removed and destroyed while the reviewers were onsite. Additionally, Touro provided the reviewers with an addendum to its Admissions Policies, effective November 19, 2013, which includes a “Document Inclusion/Exclusion Policy” stating that documents containing PII for other candidates will be excluded from the file.

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

Record Retention:

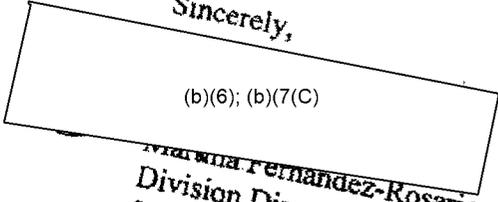
Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

Touro University
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We would like to express our appreciation for the courtesy and cooperation extended during the review. If you have any questions concerning this letter, please call Tracy Simmonds at (415) 486-5688.

Sincerely,

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


Marina Hernandez-Rosario
Division Director
San Francisco/Seattle School Participation Division

cc: Ms. Lynne Moseley, Financial Aid Director
WASC Senior College and University Commission
Nevada Commission on Postsecondary Education