July 16, 2014

Dr. Fardad Fateri
CEO/President
International Education Corporation
16485 Laguna Canyon Road, Suite 300
Irvine, CA 92618

RE: **Final Program Review Determination**
OPE ID: 02502700
PRCN: 201230427966
UEI (United Education Institute)
3563 Phillips Highway, Bldg. C, Suite 300
Jacksonville, FL 32207-5627

Dear Dr. Fateri:

The U.S. Department of Education's (Department's) School Participation Division - Atlanta issued a program review report on March 5, 2013 covering United Education Institute's (UEI) 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 2010/2011 and 2011/2012 award years. The institution's final response was received on July 15, 2013.

The School Participation Division – Atlanta has reviewed UEI's response(s) to the Program Review Report which is incorporated by reference, in its entirety, into and made part of this final program review determination. UEI's response has resolved all findings. In addition UEI has provided assurances that the appropriate corrective actions have been taken to resolve and prevent future occurrences of all findings. Therefore, UEI may consider the program review closed with no further action required.

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

If you have any questions please call Oscar Howard at (404) 974-9294.

Sincerely,

(b)(6)

Christopher Miller
Division Director

Enclosure: Program Review Report

cc: Ms. Ena Hull, Vice President of Financial Planning
Mr. Roger J. Williams, Executive Director, Accrediting Council for Continuing Education and Training

Final Program Review Determination
PRCN #: 2012-30427966

Appendix A

Program Review Report

Prepared for

UEI (United Education Institute)
D/B/A UEI College

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

PROUD SPONSOR of the AMERICAN MIND™

OPE ID: 02502700
PRCN: 2012 30427966

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

Program Review Report

March 5, 2013

61 Forsyth Street, SW, Room 18T40, Atlanta, GA 30303-3104
StudentAid.gov

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Appendix A: Student Sample

A. Institutional Information

UEI (United Education Institute)
D/B/A UEI College
Bldg. C, Suite 300
Jacksonville, FL 32207-5627

Type: Proprietary

Highest Level of Offering: Non-Degree 1 Year (900-1799 hours)

Accrediting Agency: Accrediting Council for Continuing Education & Training

Current Student Enrollment: 1567 (2012)

% of Students Receiving Title IV: 98.97% (2012)

Title IV Participation:

Fiscal records: 2011-2012

Federal Pell Grant	$ 12,102,866
Federal Supplemental Educational Opportunity Grant (FSEOG)	199,999
Federal Work-Study (FWS)	110,187
William D. Ford Federal Direct Loan Program (Direct Loan)	21,016,159

Default Rate FFEL/DL: 2010- 11.5%
2009- 9.0%
2008- 19.7%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at UEI (United Education Institute) (UEI) from June 25, 2012 to June 29, 2012. The review was conducted by Oscar Howard, Arva Thomas and James Wiley.

The focus of the review was to determine UEI'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 UEI'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 2010-2011and 2011-2012 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 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 UEI'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 UEI 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 UEI to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding 1: <u>Independent Student Status Not Documented</u>

<u>Citation:</u> Section 480(d) of the Higher Educational Act of 1965, as amended (HEA), defines an independent student as someone who fits into one or more of six specific categories.

- Is 24 years of age or older by December 31 of the award year;
- Is an orphan or ward of the court;
- Is a veteran of the Armed Forces of the United States;

- Is a graduate or professional student;
- Is a married individual;
- Has legal dependents other than a spouse;
- Is a single undergraduate student with no dependents who was not claimed as a dependent by his or her parents (or guardian) for income tax purpose for the 2 calendar years preceding the award year and demonstrates to the financial aid administrator total self-sufficiency during the 2 calendar years in which the initial award will be granted by demonstrating annual total resources (including all sources of resources other than parents) of $4,000; or
- Is a student for whom a financial aid administrator makes a documented determination of independence by reason of other unusual circumstances

Noncompliance: For the 2010-2011 award year, student #16 file show two different addresses for the same time period. The 2010-2011 ISIR shows that the student had income of only $3,360. The ISIR shows the student as an independent student only because she indicated that she has children that she supports. The student lives at the same address as her parents.

There is a verification worksheet in the student's file dated 4/30/10, showing the parent's address. The household shows the student, age 18 and unborn child 6 months. The estimated family contribution (EFC) is -00000.

For the 2011-2012 award year, the ISIR shows the student and parents at the same address. The household size is 3 and 1 in college. The student is now a dependent student. The EFC for the 2011-2012 award year is 05562. The fact that the student is now a dependent student for the 2011-2012 award year would indicate or suggest that the student was not an independent student the 2010-2011 award year.

Due to the conflicting information with the two addresses, income of only $3,360 and the student living in the parent's household should have raised questions as to whether the student was an independent student and if the student had children that she supports. The institution should have resolved the conflicting address information. In addition, due to the low income the institution should have required the student to provide documentation identifying the children she supports and the amount and type of support she provides. The student was package as an independent student for the 2010-2011 award year.

Student #26 is less than 24 years old. The 2011-2012 ISIR shows the student as an independent student because she indicated that she has children that she supports. The student had no income and had untaxed income of only $2,400. The institution should have required the student to provide a statement identifying the children she supports and the amount and type of support she provides.

Required Action: UEI must provide documentation to support the independent student status for student #16 for the 2010-2011 award year. The student should provide documentation identifying the children she supported and the type and amount of support provided. If UEI

cannot provide the documentation, the student eligibility for Title IV aid must be recalculated as dependent student using the parents' income.

UEI must provide documentation to support the independent student status for student #26 for the 2011-2012 award year. The student should provide documentation identifying the children she supported and the type and amount of support provided. If UEI cannot provide the documentation, the student eligibility for Title IV aid must be recalculated as dependent student using the parents' income.

Finding 2: Ineligible Students-No Valid High School Diploma, GED and/or signed Attestation of High School Graduation form

Citation: Pursuant to 34 C.F.R. § 668.32, a student is eligible to receive Title IV, HEA program assistance if the student

- is a regular student enrolled, or accepted for enrollment, in an eligible program at an institution;
- has a high school diploma or its recognized equivalent;

Noncompliance: Student #4, #6, #7, #17, #20 and #25 did not have a valid high school diploma, GED and/or signed Attestation of High School Graduation form in their files.

UEI requires all students applying for admission and financial aid to sign an Attestation of High School Graduation form to verify high school graduation as part of the admission requirements.

Student #4 – The high school graduation and/or GED attestation form was not signed, therefore; the student did not meet the admission requirements.

Student #6- No high school graduation and/or GED attestation form was in file. Therefore; the student did not meet the admission requirements.

Student #7- No high school graduation and/or GED attestation form was in file. Therefore; the student did not meet the admission requirements.

Student #17- No high school graduation and/or GED attestation form was in file. Therefore; the student did not meet the admission requirements.

Student #20- No high school graduation and/or GED attestation form was in file. Therefore; the student did not meet the admission requirements.

Student #25- No high school graduation and/or GED attestation form was in file. Therefore; the student did not meet the admission requirements.

Required Action: The institution must provide a valid high school diploma, GED and/or high school graduation or GED attestation for students listed above. If the institution is unable to provide a valid high school diploma, GED and/or high school graduation or GED attestation the funds disbursed will become an institution liability.

The institution must conduct a file review of all students enrolled for the 2010-2011 and 2011/2012 award years. The institution must identify all students enrolled during this period and did not have a high school diploma, GED and/or high school graduation or GED attestation on file. A report in an Excel spreadsheet format detailing the results of the institution's review must be submitted in the following format via diskette and/or can be submitted electronically.

The institution must review each file. For each student identified the institution must provide the following information.

1. Student Name and Social Security Number
2. Award Year
3. Amount and type of Title IV aid disbursed by program

Example:

Student	SSN (last 4)	Award Year	Amount of Aid	
Totals				

In lieu of performing a file review for the entire population of students who were enrolled for the 2010-2011 and the 2011-2012 award years (2588) to determine actual liabilities, UEI 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 (555). 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 UEI wishes to select this option, use the statistical sample listings for award years 2010-2011 and 2011-2012 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. The statistical sample listings for award years 2010-2011 and 2011-2012 will be provided to UEI once the Department is notified the institution has selected the option of performing this file review for only the remainder of the statistical sample not tested by the Department during the program review.

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

The institution must engage an independent Public Accountant (IPA) to test the file review completed by the institution. 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 Oscar Howard within 30 days of the institution's receipt of the Program Review Report. Mr. Howard 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(s) completed by institution, 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 must prepare the report in accordance with AICPA Attestations Standards. The IPA's report must be submitted with the institution's response to this Program Review Report.

The institution's response must also provide a description of the steps that will be taken to improve their policies and procedures to prevent a repeat finding in the future. Repayment instructions will be provided in the Final Program Review Determination Letter.

Finding 3: Workforce Investment Act (WIA) Funds Not Included In the Estimated Financial Assistance (EFA)/ Component of the Cost of Attendance (COA) In Calculating Students' Eligibility

Citation: The Secretary considers that "estimated financial assistance" includes, but is not limited to, any aid from the FSA programs, as well as grants, scholarships, loan and need- based employment that you can reasonable anticipate at the time you award aid to the student, whether the assistance is awarded by the school or by an individual or organization outside the school. The regulations specify that "estimated financial assistance" is aid that the student will receive for the same period of enrollment as the Stafford or PLUS Loan.

EFA does not include non-FSA aid if that aid offsets all or apportion of a component of a student's COA and that amount is excluded from the COA as well. If aid is excluded from either EFA or COA, that amount must be excluded from both EFA and COA. 34 C.F.R. § 673.5(c)

Noncompliance: The reviewer; analyzed the 90/10 revenue attestation percentage calculation performed for the period 01/01/2011 - 12/31/2011 by the school's corporate office. Based on our review of the 90/10 revenue attestation calculation, UEI recorded $105,264.76 in revenue from Workforce Invest Act (WIA) grant funds for 01/01/2011 through 12/31/2011. UEI received the following WIA grant funds for students that attended the Morrow, GA campus - $42,861.87; the Jacksonville, FL campus - $47,402.89; and the San Marcos, CA campus - $15,000.

We requested documentation of students who attended any of UEI's campuses during the 2011 and 2012 award year and received WIA funds. Documentation was provided showing where 18, Jacksonville campus students received a total of $65,169 in WIA payments applied on their student accounts during the 2011 and 2012 award years. Twelve students received a total of

$43,769 in WIA grant fund disbursements during the 2010-2011 award year and six students received $21,400 in WIA grant fund disbursements during the 2011-2012 award year.

A review of the Financial Aid Award Letters and/or Confirmed Budget Worksheets of the 18 students did not show any WIA funds scheduled to be disbursed or considered in the student's budget worksheets.

It was confirmed by Ms. Hull (corporate's Vice President for Financial Planning) that none of the students' WIA grant funds that were received and posted by the school to students' accounts were considered when the school or the corporate office prepared the student's budgets for determining the amount of Title IV funds the students were eligible to receive. Ms. Hull stated that they will have to recalculate the students' financial need using the WIA grant funds included in the students' cost of attendance budgets and revise the amount of Title IV funds the students were eligible to receive.

Overall, based on the 90/10 revenue attestation calculation, UEI recorded $105,264.76 in revenue from WIA grant funds for students attending the Morrow, GA; Jacksonville, FL and San Marcos, CA campuses. UEI provided documentation to show where 18 Jacksonville campus students received a total of $65,169 in WIA payments applied on their student accounts during the 2011 and 2012 award years.

Required Action: UEI must conduct a file review of all locations which falls under the main location (Jacksonville) and identify all students who received WIA funds for the 2010/2011 and 2011/2012 award years. Once the students have been identified, UEI must re-calculate each student's Title IV financial need using the WIA grant funds in the students' COA budgets. If the WIA grant funds reduced the amount of Title IV aid that the students were entitled to receive, the students' excess Title IV aid will need to be determined.

A report in an Excel spreadsheet format detailing the results of the institution's review must be submitted in the following format via diskette and/or can be submitted electronically.

The institution must review each file. For each student identified the institution must provide the following information.

1. Student Name and Social Security Number
2. Award Year
3. Over-award amount and type of Title IV aid disbursed by program

Example:

Student	SSN (last 4)	Award Year	Over-award Amount
Totals			

For the 2012/2013 award year, UEI must conduct a file review and identify all students who received WIA funds. If the WIA funds were not included in determining the student's eligibility for Title IV, the student's eligibility must be recalculated to include the WIA funds. Any student who eligibility changes due to the re-calculation, current year award (2012/2013) must be adjusted to reflect the change.

The institution must engage an independent Public Accountant (IPA) to test the file review completed by the institution. 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 Oscar Howard within 30 days of the institution's receipt of the Program Review Report. Mr. Howard 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(s) completed by institution, 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 must prepare the report in accordance with AICPA Attestations Standards. The IPA's report must be submitted with the institution's response to this Program Review Report.

The institution's response must also provide a description of the steps that will be taken to improve their policies and procedures to prevent a repeat finding in the future. Repayment instructions will be provided in the Final Program Review Determination Letter.

Finding 4: Incorrect Return to Title IV Refund (R2T4) Calculation

Citation: Pursuant to 34 C.F.R. § 668.22, of the General Provisions regulations, when a recipient of a Title IV grant or loan assistance withdraws from an institution during a payment period, the institution must determine the amount of Title IV grant or loan assistance (not including FWS or non-Federal share of FSEOG awards) that the student earned as of the student's withdrawal date in accordance with paragraph (e) of this section.

The withdrawal date for a student who withdraws from an institution that is required to take attendance, including a student who does not return from an approved leave of absence, or who does not finish the payment period, the institution must use the last date of academic attendance as determined by the institution from its attendance records.

Noncompliance: The Return to Title IV refund calculation for students #2 was incorrect.

The Return of Title IV funds worksheet for student # 2 contained incorrect data. The worksheet shows completed days of 123 and total days of 253. The correct number of completed days is 120 and the correct number of total days is 250. The institution returned $3,881. The institution should have returned $3,928.

Required Action: The institution must correct the refund calculation for the student #2. The institution must also return the addition refund amount of $47 created as a result of the incorrect calculation. In response to this finding the institution must provide documentation that the refund amount has been returned and the student has been properly notified.

Finding 5: Missing Enrollment Agreement

Citation:
A person must be enrolled as a regular student in an eligible program in order to receive Federal Student Aid funds (FSA). A regular student is someone who is enrolled or accepted for enrollment in an eligible institution for the purpose of obtaining a degree or certificate offered by the school. A school must document a student's enrollment in an eligible program at the time of admission. The enrollment agreement serves as evident that a student is enrolled in an eligible program and eligible to receive FSA.
34 C. F. R § 668.164

Noncompliance: Student #6 enrolled in the Dental Assistant program on 4/22/2010. The student last date of attendance in the program was 7/19/2010. The student was dropped from the institution on 7/20/2010. The file contains an award letter for the 2010-2011 award year indicating that the student enrolled in the Business Office Administration program with a start date of 8/11/2010. The official student transcript also shows the student's start date of 8/11/2010 for the Business Office Administration program. There is no enrollment agreement showing that the student ever enrolled in the Business Office Administration program.

Required Action: The enrollment agreement serves as admission documentation that the student is enroll in an eligible program seeking a degree and/or certificate. The enrollment agreement also serves to determine a student eligible for FSA. The institution must provide a copy of the enrollment agreement the student signed to enroll in the Business Administration Office program.

Finding 6: Inadequate Satisfactory Academic/Attendance Progress Policy (SAP)

Citation: An institution must establish a reasonable satisfactory academic progress (SAP) policy for determining whether an otherwise eligible student is making satisfactory academic progress in his or her educational program. An institution's standards are consider to be reasonable if the standards are in accordance with the provisions specified in 34 C. F. R. §668.34

Noncompliance: Effective July 1, 2011, the new SAP regulation went into effect. The institution's SAP policy provided during the onsite review was not in complete compliance with the new regulation. The new regulation requires the SAP to be checked at least annually or at the end of each payment period. The institution's written policy must state whether their SAP policy is checked annually or at the end of each payment period. The policy as currently written does not clearly define the payment period. The policy states progress is measured at the end of each module. It is not clear if the end of each module represents a payment period.

The policy states that, "Progress by maintaining a minimum cumulative grade point average and progress academically at a rate that allows them to complete the program in a timely manner." The minimum cumulative grade point average is not stated.

The Pace Standard is not in compliance with the new regulation requirements. Pace at each evaluation should permit a student to complete the program requirements within 150%. In order to accomplish this, the completion rate at each evaluation should be at least 67%. The current SAP policy completion rate is less than 67% which means that a student could not successful complete the program in 150%. The SAP sample completion chart in the SAP policy completion percentages are below 67% in 11 out of 12 modules.

Under the appeal process it states that students have the right to appeal any action by the school. The SAP appeal process should only address issues related to the student not making SAP and not being eligible to receive financial aid. The appeal should clearly state how students re-gain eligibility to receive Federal financial aid funds. The policy should state and include any extenuating circumstance under the appeal process.

In reference to probation, the policy states that students dropped for lack of SAP may apply for re-admission after a waiting period of one module. If accepted for re-admission the student will be enrolled for a probationary grading period. There is no mention here of an appeal. Under the new regulation, there must be an appeal before there can be a probation period. Re-applying for admission after a waiting period does not cure or re-establish SAP.

Required Action: The SAP as current written is not in compliance with the new SAP regulation. The policy does not include the new terminology of the new regulation. The policy elements must be written in the order as indicated in the regulation.

The institution must re-write its SAP policy to comply with the new regulation. In response to this finding, UEI must submit a copy of the revised policy to this office in their response to this report.

Finding 7: Incomplete Admission Policy

Citation: An institution shall establish and maintain, on a current basis, any application for Title IV, HEA program funds and program records that document its administration of the Title IV programs in accordance with all applicable requirements. 34 C. F. R. §668.24

Noncompliance: The admission policy states that each potential student is to be provided all information needed to make an informed decision to enroll in a vocational program. The Admission department will contact leads, set appointments, interview and tour potential students, schedule entrance testing, schedule financial assistance appointments, enroll students who meet all eligibility requirements, complete all required forms and stay in touch with enrollees before during and after their start date.

The admission policy as currently written does not state what the eligibility requirements are. The institution also changed their admission policy effective July 1, 2012. Effective this date, all new students applying for Title IV Federal financial aid must have a high school diploma or GED to qualify for financial aid. To ensure that all students applying for financial aid have a high school diploma or GED, UEI contracted with a verification service to verify high school graduation or GED. In addition, any student enrolling prior to July 1, 2012 will also have their high school graduation status verified to meet admission requirements. The institution failed to update their policy with the new requirements.

Required Action: The institution must revise and update the admission policy. The eligibility/enrollment requirements must be clearly stated in the policy. The new proof high school graduation or GED requirement along with any other new requirements must be included in the policy. The institution must provide a copy of its revised policy to this office in their response to this finding.

Finding 8: Incomplete Verification Policies and Procedures

Citation: An institution shall establish and use written policies and procedures for verifying information contained in a student aid application in accordance with the provisions of 34 C. F. R. §668, Subpart E. 34 C. F. R. §668.53.

Noncompliance: UEI failed to update its verification policy and procedures to comply with the new verification regulations dated July 13, 2013. 34 C. F. R. § 668.51-61.

The current policy does not contain:

- the time period in which students must submit verification documentation,
- the various types of documentation the student is required to submit,
- the method you will use to notify students if their EFC and Title IV aid amount change,
- the procedure you will follow to refer a student to the Office of Inspector General,
- the institution verify 100% of the application selected for verification.

Required Action: Because the verification regulations are new for the 2012-2013 award years the institution's verification policy and procedures need to be revised to comply with the current regulations. While some of the guidance is unchanged, there are significant differences. One of the big changes is the acceptable documentation for verification. The institution must rewrite their policy to comply with the new regulations and provide a copy of the revised policy and procedures to this office with their response to this finding.

Finding 9: Incomplete Consumer Information

Citation: Each year a school must provide to enrolled students a notice containing a list of the consumer information it must disseminate, and the procedures for obtaining this consumer information. Schools must provide this notice through a one-on-one distribution.

Schools must also provide a notice (though not an individual notice) of student rights under the Family Educational Rights and Privacy Act (FERPA). 34 C. F. R. § 668.41- 48

Schools must also provide notice of and confirmation that the institution held an Educational program commemorating the September 17, 1787 signing of the Constitution on September 17th of each year (or preceding or following week, if the 17th falls on a Saturday, Sunday, or holiday). Pub. L. 108-447

Noncompliance: UEI failed to comply with the followings consumer information requirements:

- Constitution and Citizenship Day
- Return to Title IV Policy
- Verification Policy
- Completion/graduation rates
- Student Body Diversity
- Penalties associated with drug-related violations
- Student Right-to-Know Act

Required Action: UEI must update its consumer information to include the information listed above. The institution must submit an update copy of its consumer information to this office with its response.

Finding 10: Missing/Untimely Exit Counseling

Citation: Institutions are required to conduct exit interviews with all Federal Stafford/Direct Loan borrowers prior to their leaving the Institution. If the borrower leaves the institution without notice, the institution must provide exit counseling through either interactive electronic means or by mailing counseling material to the borrower at the borrower's last known address within 30 days after learning that the borrower has withdrawn from school or failed to complete exit counseling. 34 C.F.R. §680.604(g)

Noncompliance: The Institution failed to provide exit counseling and/or provided untimely exit counseling to students #1, #14, #16, #21, and #30. Borrowers who do not understand their loan obligations are more likely to default on their loans; thus a failure to perform exit counseling contributes to a high Federal Stafford/Direct Loan default rate. Loans that go into default status create increased expense for the U.S Department of Education.

Required Action: Failure to conduct exit counseling for students who have either Graduated or withdrawn results in students who are less aware, or unaware, of their responsibility as loan recipients, including the requirement that the loan must be repaid.

In response to this finding, please provide documentation that exit counseling has been complete for students #1, #14, #16, #21, #22 and #30. The institution's response must also provide a description of the steps that will be taken to prevent a repeat finding in the future.