



January 30, 2015

Dr. Len Jessup, President  
University of Nevada - Las Vegas  
4505 South Maryland Parkway  
Las Vegas, NV 89154-1001

Certified Mail  
Return Receipt Requested  
#: 7007 0710 0001 0675 7015

**RE: Final Program Review Determination**

OPE ID: 00256900

PRCN: 201140927637

Dear Dr. Jessup:

The U.S. Department of Education's (Department) San Francisco/Seattle School Participation Division issued a program review report on November 8, 2011 covering University of Nevada - Las Vegas's (UNLV'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). Specifically, the program review report focused on UNLV's self-reported issue regarding a student who was billed for Federal Direct Student Loans (and accrued interest) that the student did not receive for the award years 2007-2008 and 2008-2009. UNLV's final response was received on December 8, 2011. A copy of the program review report (and related attachments) and UNLV's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by UNLV 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 in the 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 \$100,281.30.

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

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### **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. Student specific information can be found in Appendices A, E and F.

### **Appeal Procedures:**

This constitutes the Department's final program review determination with respect to the liabilities identified from the November 8, 2011 program review report. If UNLV wishes to appeal to the Secretary for a review of financial liabilities established by the FPRD, the institution must file a written request for an administrative hearing. Please note that institutions may appeal financial liabilities only. The Department must receive the request no later than 45 days from the date UNLV receives this FPRD. An original and four copies of the information UNLV 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

UNLV'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 final program review determination. 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 UNLV'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 UNLV has any questions regarding this letter, please contact Kimberly Wu, Institutional Review Specialist, of my staff at (415) 486-5619. Questions relating to any appeal of the final program review determination should be directed to the address noted in the Appeal Procedures section of this letter.

Sincerely,

(b)(6)

Martina Fernandez-Rosario  
Division Director  
San Francisco/Seattle School Participation Division

Enclosures: Protection of Personally Identifiable Information  
Final Program Review Determination Report (and appendices)

cc: Mr. Norm F. Bedford, Director, Financial Aid & Scholarships  
Nevada Board of Regents  
Northwest Commission on Colleges and Universities  
Department of Defense (sent via email)  
Department of Veterans Affairs (sent via email)  
Consumer Financial Protection Bureau (sent via email)

## **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  
University of Nevada – Las Vegas

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OPE ID: 00256900  
PRCN: 201140927637

Prepared by:  
U.S. Department of Education  
Federal Student Aid  
San Francisco/Seattle School Participation Division

Final Program Review Determination  
January 30, 2015

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**A. Institutional Information**

University of Nevada-Las Vegas  
4505 South Maryland Parkway  
Las Vegas, NV 89154-3504

Type: Public

Highest Level of Offering: Doctor's Degree

Accrediting Agency: Northwest Commission on Colleges and Universities

Current Student Enrollment: 28,203 (Fall 2010)

Title IV Participation per U. S. Department of Education Records for the 2013-2014 Award Year

Federal Pell Grant (FPell) Program	\$ 33,299,344
Teacher Education Assistance for College and Higher Education (TEACH) Grant	\$ 59,260
Federal Direct Subsidized Loan (Sub DL)	\$ 31,201,533
Federal Direct Unsubsidized Loan (Unsub DL)	\$ 73,042,017
Federal Direct PLUS (PLUS DL)	\$ 11,635,987
Federal Direct Grad Professional PLUS (Grad PLUS)	\$ 16,992,004
Federal Perkins Loans	\$ 377,848
Federal Supplemental Educational Opportunity Grant (FSEOG)	\$ 790,917
Federal Work-Study	\$ 1,013,929

Default Rate FFEI/DL:	2011	6.9%
	2010	5.0%
	2009	4.5%

Default Rate Perkins:	6/30/2012	13.0%
	6/30/2011	14.4%
	6/30/2010	28.7%

## **B. Scope of Review**

The U.S. Department of Education (the Department) conducted an off-site program review at University of Nevada-Las Vegas (UNLV) from August 30, 2011 to August 31, 2011. The review was conducted by Lana Walter.

The focus of the review was based on a self-reported issue regarding a student who was billed for Federal Direct Student Loans (and accrued interest) that the student did not receive for the award years 2007-2008 and 2008-2009. The review consisted of an examination of documentation submitted by UNLV, National Student Loan Data System (NSLDS) records, Bank of America payment verification records, and other payment documents.

In addition, UNLV's response, dated December 8, 2011, to the Program Review Report (PRR) stated that due to a subsequent internal review of its records, UNLV identified additional unclaimed credit balances in its Legacy computer software system. These additional unclaimed credit balances affected 89 students who did not cash their checks for Title IV funds earned during the 2005-2006 through the 2009-2010 award years. UNLV did not return those funds to the Department. Therefore, this non-compliance issue is also addressed below, even though it was not stated in the PRR issued on November 8, 2011.

### **Disclaimer:**

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

## **C. Findings with Final Determinations**

The two findings requiring further action are summarized below. At the conclusion of each finding is a summary of UNLV's response to the finding, and the Department's final determination for that finding. A copy of the PRR issued on November 8, 2011 is attached as Appendix E.

### **Finding 1. Failure to Deliver Federal Direct Loan Proceeds to Student**

#### **Noncompliance:**

Funds received by an institution under Title IV, HEA programs are held in trust for intended student beneficiaries. The institution, as a trustee of federal funds,

may not use or hypothecate these funds for any other purpose. 34 C.F.R. § 668.161(b); 685.309(g). The regulations set forth the requirements that institutions must follow when disbursing Title IV funds, including the timing of disbursements, the method of disbursement, and the limitations on making disbursements. See 34 C.F.R § 668.164.

The Department learned that Federal Direct Loans were certified for one student for award years 2007-2008 and 2008-2009, but the loan proceeds were not delivered to the student. The student contacted the school when she was being billed for Direct Loan disbursements she never received and the accrued interest. For 2007-2008, the following loans were certified but not disbursed: two Graduate PLUS Loans of \$6,665.00 and \$3,333.00 respectively and an Unsubsidized Direct Loan of \$3,547.81. For the 2008-2009 award year the following loans were certified but not disbursed: one Subsidized Direct Loan of \$5,667.00 and an Unsubsidized Direct Loan of \$25,778.00. UNLV contacted the Department to report this issue of noncompliance and sought assistance in returning the loan proceeds to the Direct Loan program. UNLV indicated that this was an isolated occurrence of failure to deliver loan proceeds and no other students were affected.

#### **Directives From Program Review Report:**

Prior to the issuance of the program review report, UNLV returned the principal amount of the loans to the Direct Loan program account. Even though this was an isolated occurrence, UNLV was required to establish a system to prevent this from happening in the future and submit a description of the new system in response to the report. In addition, UNLV was informed that it would be liable for interest associated with these student loans.

#### **Final Determination:**

UNLV agrees with the finding. In the response, it stated that their new computer software system (PeopleSoft) allows more effective and efficient tracking capabilities of students who receive financial aid credit balance checks, but never cash the checks. When checks are not claimed by students, award transactions are adjusted and funds are returned to the appropriate program within the timeframe required. In addition, students are encouraged to enroll in an electronic funds transfer system to receive credit balance disbursements.

UNLV is liable for the Direct Loans that were certified but never disbursed to this student. In response to this finding, UNLV provided bank account information which substantiated that it had remitted two payments of \$13,157 and \$31,289 to the Department via Fedwire on June 9, 2011. The remaining principal liability for this finding is \$544.81. UNLV is also liable for the interest costs associated with this student's undisbursed Direct Loans. We have estimated the amount of interest owed

to be \$4,500.00. A copy of the interest calculation is included as Appendix C and the interest calculations specific to this student are categorized as “2007-2008” and “2008-2009” under the “Description/Name” column.

## **Finding 2. Failure to Return Unclaimed Title IV Credit Balances**

### **Noncompliance:**

The Title IV regulations set forth specific actions that an institution must take if it is unable to disburse funds to a student or parent. An institution must return to the Secretary, lender, or guaranty agency, any Title IV, HEA program funds, except Federal Work Study (FWS) program funds, that it attempts to disburse directly to a student or parent but the student or parent does not receive or negotiate those funds. In addition, if an institution attempts to disburse the funds by check and the check is not cashed, the institution must return the funds no later than 240 days after the date it issued that check. Further, if a check is returned to the institution, or an Electronic Funds Transfer (EFT) is rejected, the institution may make additional attempts to disburse the funds, provided that those attempts are made not later than 45 days after the funds were returned or rejected. In cases where the institution does not make another attempt, the funds must be returned before the end of this 45 day period, and no later than the 240 day period described above. 34 C.F.R. § 668.164(h).

UNLV self-reported that 91 refund checks for the 2005-2006 through the 2009-2010 award years were not claimed by 89 students. In addition, it failed to return these funds to the Department.

### **Final Determination:**

The Department requested that UNLV expand the period reviewed, over that self-reported, to include 3 additional years. On June 10, 2013, UNLV provided additional information identifying the unclaimed credit balance checks issued to its students for credit balances that occurred during the 2004-2005 through the 2011-2012 award years. UNLV identified the following unclaimed credit balance amounts, affecting 92 students, that must be returned to the Department:

- Graduate PLUS Loans - \$1,958.00
- Parent PLUS loans - \$9,947.93
- Subsidized Direct Loans - \$28,760.55
- Unsubsidized Direct Loans - \$13,119.46
- Pell Grants - \$30,632.37
- ACGs - \$750.00
- SMART Grant - \$1,000.00
- FSEOG - \$1,450.00

These credit balances total \$87,618.31. These funds, plus applicable interest costs, must be returned to the Department. The Department has estimated the interest amount to be \$7,868.18. A copy of the interest calculations are included as Appendix C.

**D. Summary of Liabilities**

The total amount calculated as liabilities from the findings in the program review determination is as follows.

	<b>Pell</b>	<b>ACG</b>	<b>SMART</b>	<b>FSEOG</b>	<b>Sub DL</b>	<b>Unsub DL</b>	<b>PLUS DL</b>	<b>Interest/Cost of Funds</b>
Finding 1					\$ 5,667.00	\$29,325.81	\$ 9,998.00	\$ 4,500.00
Finding 2	\$30,632.37	\$750.00	\$1,000.00	\$1,450.00	\$28,760.55	\$13,119.46	\$11,905.93	\$ 7,868.18
Total	\$30,632.37	\$750.00	\$1,000.00	\$1,450.00	\$34,427.55	\$42,445.27	\$21,903.93	\$12,368.18

Detail information, including the interest calculation, can be found in Appendix C and Appendix F to this FPRD.

**E. Payment Instructions**

**I. Liabilities Owed to the Department**

**Liabilities Owed to the Department \$100,000 or More**

<u>Program</u>	<u>Amount</u>
FPell	\$ 30,632.37
ACG	\$ 750.00
SMART	\$ 1,000.00
FSEOG	\$ 1,200.00
Sub DL	\$ 34,427.55
Unsub DL	\$ 42,445.27
PLUS DL	\$ 21,903.93
Interest/Cost of Funds	<u>\$ 12,368.18</u>
Sub-total	\$144,727.30
Payment via Fedwire on June 9, 2011	<u>(\$ 44,446.00)</u>
Total	\$100,281.30

UNLV owes to the Department \$100,281.30. This liability must be paid using an electronic transfer of funds through the Treasury Financial Communications System, which is known as FEDWIRE. UNLV 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 UNLV'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.

**Payment and/or adjustments made via G5 will not be accepted as payment of this liability. Instead, the school must first make any required adjustments in the Common Origination and Disbursement System (COD) as required by the applicable findings and Section II – Instructions by Title IV, HEA Program (below), remit payment, and upon receipt of payment the Department will apply the funds to the appropriate G5 award (if applicable).**

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

#### **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. UNLV is also responsible for 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 UNLV 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 requests may be sent to:

U.S. Department of Education  
Office of the Chief Financial Officer  
Accounts Receivable Group  
550 12<sup>th</sup> Street, SW, Room 6114  
Washington, DC 20202-4461

University of Nevada - Las Vegas  
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If within 45 days of the date of this letter, UNLV 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 UNLV from the Federal Government. **UNLV may object to the collection by offset only by challenging the existence or amount of the debt.**

To challenge the debt, UNLV 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 in 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.

The following identification data applies to this repayment and must be written on the attached FEDWIRE form and any other documents submitted related to this liability:

Amount: \$100,281.30  
TIN: 886000024  
PRCN: 201140927637  
DUNS: 098377336

**II. Instructions by Title IV, HEA Program**

**Liabilities Owed to the Department in the case of Direct Loans**

**Direct Loan Archived Award Years**

Findings: 1 & 2

The following chart represents the liabilities owed for this finding, some of which have already been repaid by UNLV.

<b>DL Archived Award Year</b>			
Amount (Principal)	Amount (Interest)	Award Year	Program Award #
\$ 3,499.00	\$ 223.00	2004-2005	P268K050266
\$ 3,712.50	\$ 398.00	2005-2006	P268K060266
\$ 7,023.55	\$ 1,225.00	2006-2007	P268K070266
\$27,287.41	\$ 4,584.00	2007-2008	P268K080266
\$55,181.93	\$ 3,905.00	2008-2009	P268K090266
\$ 1,521.00	\$ 21.00	2009-2010	P268K100266
\$ 551.36	\$ 2.00	2010-2011	P268K110266
<b>Total Principal</b>	<b>Total Interest</b>		
<b>\$98,776.75</b>	<b>\$10,358.00</b>		

The disbursement record for each student identified in Appendix F must be adjusted in COD. A copy of the adjustment to each student’s COD record must be sent to Kimberly Wu **within 45 days of the date of this letter.**

**Adjustments in COD must be completed prior to remitting payment to the Department. Payment cannot be accepted via G5. Once the Department receives payment via FEDWIRE, the Department will apply the principal payment to the applicable G5 award. The interest will be applied to the general program account.**

The Direct Loan records for award years prior to 2011-2012 are archived. Please contact the Internal Controls Division’s School Reconciliation Team, Lisa Howell at (202) 377-3290 or Constance Daly at (202) 377-3119, or send an email to SchoolReconciliation@ed.gov, for assistance in making the adjustments. When contacting the Internal Controls Division School Reconciliation Team the following information must be provided:

- DL Award ID
- School Name
- Year Requested

- Reason: Program Review
- Program Review Control Number: 201140927637

**Liabilities Owed to the Department in the case of Title IV Grants**

**Pell Grants, ACG, SMART - Closed Award Years**

Finding 2

UNLV must repay:

<b>Pell Grant, ACG, or SMART Closed Award Year</b>				
Amount (Principal)	Amount (Interest)	Title IV Grant	Award Year	Award No.
\$ 2,061.03	\$145.85	Pell Grant	2008-2009	P063P080266
\$10,065.87	\$136.80	Pell Grant	2009-2010	P063P090266
\$ 375.00	\$ 1.35	ACG	2010-2011	P375A100266
\$ 3,953.44	\$ 14.19	Pell Grant	2010-2011	P063P100266
<b>See FISAP Instructions</b>	\$ 0.67	FSEOG	2010-2011	P007A102493
\$ 1,000.00	\$ 3.59	SMART	2010-2011	P376S100266
\$ 5,870.39	\$ 0	Pell Grant	2011-2012	P063P110266
<b>Total Principal</b>	<b>Total Interest</b>			
\$23,325.73	\$302.45			

The disbursement record for each student identified in Appendix F must be adjusted in COD.

**Adjustments in COD must be completed prior to remitting payment to the Department. Payment cannot be accepted via G5. Once the Department receives payment via FEDWIRE, the Department will apply the principal payment to the applicable G5 award. The interest will be applied to the general program account.**

A copy of the adjustment to each student’s COD record must be sent to Kimberly Wu **within 45 days of the date of this letter.**

**Pell Grants, ACG, SMART - Cancelled Award Years**

Finding 2

UNLV must repay:

<b>Pell Grant, ACG, or SMART Cancelled Award Year</b>				
Amount (Principal)	Amount (Interest)	Title IV Grant	Award Year	Award No.
\$ 100.00	\$ 10.72	Pell Grant	2005-2006	P063P050266
\$ 375.00	\$ 65.43	ACG	2006-2007	P375A060266
\$5,104.79	\$ 890.62	Pell Grant	2006-2007	P063P060266
\$1,200.00	\$ 157.02	FSEOG	2006-2007	P007A062493
\$3,476.85	\$ 583.94	Pell Grant	2007-2008	P063P070266
<b>Total Principal</b>	<b>Total Interest</b>			
<b>\$10,256.64</b>	<b>\$ 1,707.73</b>			

The liability above is for award years 2007-2008 and older and student adjustments in COD are no longer possible. Instead, the funds will be returned to the general program fund for the applicable Title IV program.

**FSEOG Payment Instructions**

Finding 2

As noted above, UNLV must repay \$1,200 in FSEOG funds for the 2006-2007 award year, plus interest of \$157.02 for 2006-2007. The FSEOG liability (\$250.00) for the 2010-2011 award year will be paid via the FISAP corrections noted below. However, there is an interest liability associated with the 2010-2011 FSEOG liability of \$.67. Therefore, the total FSEOG liability to be paid directly to the Department (per Fedwire instructions attached) is \$1,357.69.

**FISAP Corrections**

Finding 2

UNLV must make corrections to its Fiscal Operations Report and Application to Participate (FISAP) for award year 2010-2011 (FISAP filed in October, 2009) as follows:

- Log into eCB and make changes to the Working Copy, click on Submit and choose "Change Request." Provide the justification for the changes in the

comments box, including that the changes are a result of a program review and include the Program Review Control Number.

- Once the request is approved, submit the changes within 5 days.
- Changes to the FISAP may result in changes to subsequent FISAPs. Contact the eCB Call Center at (877) 801-7168 for assistance in making this determination.
- The FISAP corrections will result in an unprocessed deobligation (negative balance), so the institution must return those funds via G5 in accordance with the automated notification from eCB.

UNLV must submit proof of the FISAP corrections and payment for any unprocessed deobligation to Kimberly Wu **within 45 days of the date of this letter.**

## **F. Appendices**

Appendix A: Student Information

Appendix B: Institution's Written Response

Appendix C: Calculation of Interest Liability

Appendix D: Fed-Wire EFT Message Format & Instructions

Appendix E: Program Review Report

Appendix F: Disbursement Records for Each Student (Finding 2)