



June 17, 2014

Kyle Marrero
President
University of West Georgia
1601 Maple Street
Carrollton, Georgia 30118

UPS Next Day Air
1ZA879640295137926

RE: Final Program Review Determination
OPE ID: 00160100
PRCN: 201420428524

Dear Dr. Marrero:

During a June 13, 2013 meeting, University of West Georgia (UWG) officials reported to the U.S. Department of Education (the Department) School Participation Division – Atlanta, that the institution was not in compliance with Federal regulations for the calculation of satisfactory academic progress for Title IV, HEA recipients as prescribed by 34 C.F.R. §§ 668.16 (e), 668.32, and 668.34 of the Student Assistance General Provisions. On June 19, 2013, the former president of UWG, Dr. Beheruz Sethna, issued a letter to the Department. That letter provided a description of the institution's erroneous interpretation of the regulations, and, the preliminary impact on student-eligibility for Title IV funds.

In response to the institution's miscalculation of student-eligibility for Title IV funds, the Department issued a letter on July 2, 2013. The Department also issued a focused program review report to the institution on March 18, 2014. The purpose of the letter and report was to focus on and address the area of satisfactory academic progress (SAP) by: (1) reviewing UWG's revised policy; (2) providing applicable modifications to the policy; and (3) providing instructions for UWG to conduct a student file review. The review required UWG officials to apply the corrected SAP policy to all Title IV recipients from Fall 2011 through Summer 2013 semesters, and to identify errors.

A copy of the July 2, 2013 letter to the institution is attached as Appendix A. A copy of the March 18, 2014 program review report is attached as Appendix B.

UWG's initial response to the Department's review was received on October 17, 2013¹. A copy

¹ UWG's initial response is dated September 30, 2013 but due to the Federal Government shutdown, it was re-submitted to the Department October 17, 2013.

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
Atlanta School Participation Division
61 Forsyth St., SW, Room 18T40
Atlanta, GA 30303-8918

of this response is attached as Appendix C. UWG's final response to this review was received on April 3, 2014. A copy of this response is attached as Appendix D. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by UWG upon request. Additionally, this Final Program Review Determination Letter (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 the finding of this focused program review. The purpose of this letter is to: (1) identify liabilities resulting from the finding of this report; (2) provide instructions for payment of liabilities to the Department; (3) notify the institution of its right to appeal; and (4) to close the review.

The total liability due from the institution from this FPRD is \$2,430,287. This report contains detailed information about the liability determination for the finding.

Appeal Procedures:

This constitutes the Department's FPRD with respect to the finding identified from the institution's July 2, 2013 letter and the March 18, 2014 program review report. If UWG wishes to appeal to the Secretary for a review of monetary liabilities established by the FPRD, the institution must file a written request for an administrative hearing. The Department must receive the request no later than 45 days from the date of this FPRD. An original and four copies of the information UWG 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/SESG
830 First Street, NE - UCP3, Room 84F2
Washington, DC 20002-8019

UWG'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. Any documents relative to the appeal that include PII data must be redacted except the student's name and last four digits of his / her social security number (please see the attached document, "Protection of Personally Identifiable

- Information,” for instructions on how to mail “hard copy” records containing PII); and,
- (4) include a copy of the FPRD. The program review report 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 UWG’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).

Protection of Personally Identifiable Information:

Personally Identifiable Information (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 report do not contain any student PII. Instead, each finding references students by the Appendices attached to this report.

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. §§ 668.24 (e)(1), (e)(2) and (e)(3).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact Lisa Lancaster at (404) 974-9296. Questions relating to any appeal of the FPRD should be directed to the address noted in the Appeal Procedures section of this letter.

Sincerely,

(b)(6)

Chris Miller
Division Director
School Participation Division - Atlanta

cc: Dr. Philip Hawkins, Director of Financial Aid
Southern Association of Colleges and Schools (SACS), Commission on Colleges
GA Non-Public Postsecondary Education Commission (EXEMPT)

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).

If applicable, 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.

University of West Georgia
OPE ID: 00160100
PRCN: 201420428524
Page 1

Federal Student Aid
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Prepared for
University of West Georgia

OPE ID: 00160100
PRCN: 201420428524

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

Final Program Review Determination
June 17, 2014

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Appendices

- Appendix A: UWG's July 2, 2013 Letter
- Appendix B: Focus Program Review Report
- Appendix C: UWG's Initial Response
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- Appendix E: EAL
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A. Institutional Information

University of West Georgia
1601 Maple Street
Carrollton, Georgia 30118

Type: Public

Highest Level of Offering: Doctoral Degree

Accrediting Agency: Southern Association of Colleges and Schools Commission on Colleges

Current Student Enrollment: 11,929 (2013-2014)

% of Students Receiving Title IV: 77% (2013-2014)

Title IV Participation:

| <u>Program / Funding (per EDCAPS G5)</u> | <u>2012-2013</u> |
|--|------------------|
| Federal Direct Loan (FDL) | \$72,860,983 |
| Federal Pell Grant (Pell) | \$20,789,429 |
| Federal Supplemental Education Grant (FSEOG) | \$ 233,684 |
| Federal Work Study (FWS) | \$ 277,997 |
| Federal Perkins Loan (Perkins) | \$ 128,686 |
| National Teach Grant Program | \$ 0 |

| | | |
|-------------------|------|------|
| Default Rate FDL: | 2011 | 8.2% |
| | 2010 | 4.8% |
| | 2009 | 5.3% |

| | | |
|-----------------------|------|-------|
| Default Rate Perkins: | 2013 | 17.4% |
| | 2012 | 30.6% |
| | 2011 | 25.4% |

B. Scope of Review

Following a June 13, 2013 meeting between University of West Georgia (UWG) and U.S. Department of Education (the Department) officials in which the institution proactively self-reported an error to correctly monitor the academic progress of Title IV recipients, the Department issued a letter to the institution. The letter, issued July 2, 2013, requested UWG to correct and submit its policy to monitor academic progress for Title IV recipients in addition to reevaluating student records. The Department also issued a focused program review report on March 18, 2014. The review was conducted by Lisa Lancaster.

The Department's review consisted of an examination of UWG's revised satisfactory academic progress (SAP) policies and procedures. The review also required UWG officials to apply the corrected SAP policy to its Title IV recipients from the 2011-2012 and 2012-2013 award years and identify incorrect determinations of SAP.

A copy of the July 2, 2013 letter to the institution is attached as Appendix A. A copy of the March 18, 2014 program review report is attached as Appendix B.

Disclaimer:

This focused review cannot be assumed to be all-inclusive. The absence of statements in the program review report concerning UWG's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, the review does not relieve UWG of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

C. Finding and Final Determination

The program review report finding requiring further action is summarized below. At the conclusion of the finding is a summary of UWG's response, and the Department's final determination for that finding.

Copies of UWG's responses to the review are attached as Appendix C and Appendix D. Documents to support UWG's response (e.g., spreadsheets, policies, emails, corrections) will be furnished upon request.

Finding 1: Satisfactory Academic Progress – Calculation Error

Citation Summary:

Student Assistance General Provisions 34 C.F.R. §§ 668.16 (e), 668.32, and 668.34 require institutions to establish, publish, and apply reasonable standards for measuring whether an otherwise eligible student is maintaining SAP in his or her educational

program. The Secretary considers an institution's standards to be reasonable if the standards—

- Are the same as or stricter than the institution's standards for a student enrolled in the same educational program who is not receiving Title IV assistance.
- The policy provides for consistent application of standards to all students within categories of students, *e.g.*, full-time, part-time, undergraduate, and graduate students, and educational programs established by the institution.
- The policy provides that a student's academic progress is evaluated—
 - At the end of each payment period if the educational program is either one academic year in length or shorter than an academic year; or
 - For all other educational programs, at the end of each payment period or at least annually to correspond with the end of a payment period;
- The policy specifies a qualitative standard, or grade point average (GPA) that a student must achieve at each evaluation (if a GPA is not an appropriate qualitative measure, a comparable assessment measured against a norm).
- If a student is enrolled in an educational program of more than two academic years, the policy specifies that at the end of the second academic year, the student must have a GPA of at least a "C" or its equivalent.
- The policy specifies a quantitative standard, or the pace at which a student must progress through his or her educational program to ensure that he will complete the program within the maximum timeframe, and provides for measurement of the student's progress at each evaluation. For an undergraduate program maximum timeframe means a period that is no longer than 150% of the published length of the educational program. For a graduate program, it means a period defined by the institution that is based on the length of the program.
- An institution calculates the pace at which the student is progressing by dividing the cumulative number of hours the student has successfully completed by the cumulative number of hours the student has attempted.
- The policy describes how a student's GPA and pace of completion are affected by course incompletes, withdrawals, repetitions, or transfers of credit from other institutions. Credit hours from another institution that are accepted toward the student's educational program must count as both attempted and completed hours. An SAP policy cannot exclude courses in which a student remained past the add/drop period and earned a grade of 'W', nor can it routinely exclude certain hours attempted, such as those taken during a summer term. All periods of the student's enrollment count when assessing progress, even periods in which the student did not receive Title IV funds.
- The policy provides that, at the time of each evaluation, a student who has not achieved the required GPA, or who is not successfully completing his or her educational program at the required pace, is no longer eligible to receive assistance.

- If the institution places students on financial aid warning, or on financial aid probation, the policy describes these statuses as follows—
 - Financial aid warning is a status assigned to a student who fails to make SAP only at an institution that evaluates academic progress at the end of each payment period. Financial aid warning may be assigned without an appeal or other action by the student. It is good for one payment period.
 - Financial aid probation is a status assigned by an institution to a student who fails to make SAP but who has appealed, and has had eligibility for aid reinstated. A student on financial aid probation may receive Title IV funds for one payment period. However, a student on financial aid probation may not receive Title IV funds for the *subsequent* payment period unless the student makes SAP or the institution places him on probation and develops an academic plan.
- If the school permits appeals, the policy must explain that the student may appeal on the basis of: his injury or illness, the death of a relative, or other special circumstances. The appeal must also explain why he or she failed to make satisfactory progress and what has changed in his situation that will allow him to make satisfactory progress at the next evaluation.
- If the institution does not permit a student to appeal a determination that he or she is not making SAP, the policy must describe how the student may reestablish his or her eligibility to receive assistance under the Title IV programs.
- The institution must have a policy to notify students of the results of an SAP evaluation that impacts his or her eligibility for funds.

Noncompliance Summary:

Upon reviewing the institution's financial aid policies and procedures, UWG's (newly hired) financial aid director discovered that the school's process to determine whether Title IV recipients were making SAP was not in compliance with the above regulations. Rather than a student's pace being calculated on a cumulative basis as required, the institution's determination of a student's pace for his or her program was based on a per-term, or semester basis. While this error may have resulted in some students not receiving aid when they should have, it also resulted in the institution awarding and disbursing aid to those who were ineligible.

Required Action Summary:

UWG officials were required to correct UWG's method to determine a student's quantitative measurement of SAP on a cumulative basis. Next, officials were instructed to apply the revised policy to all students who received any type of Title IV aid between the Fall 2011 and Summer 2013 terms and reevaluate each student's qualitative and

quantitative progress on a payment period basis. (Students who received Title IV aid for the 2013-2014 award year have been awarded aid according to the corrected policy.)

UWG's Response:

The institution's response provided a listing of all 2011-2012 and 2012-2013 student aid recipients who were not making SAP for Title IV purposes; therefore they were not eligible for the applicable amount and type of aid indicated.

Final Determination:

The review conducted by the institution reported ineligible Title IV disbursements to students (not making SAP). Amounts to be returned to the Department are as follows:

Federal Direct Loan

The total amount of Federal Direct Loan (FDL) funds that UWG improperly disbursed during the 2011-2012 and 2012-2013 award years was \$5,668,937. In lieu of requiring the institution to assume the risk of default by purchasing the ineligible loans from the holder, the Department has asserted a liability not for the loans, but rather for the estimated actual or potential loss that the government may incur with respect to the ineligible loans. The Estimated Actual Loss (EAL) to the Department that has resulted or will result from those ineligible loans is based on the most recent sector cohort default rate available. The EAL that UWG must pay to the Department for the ineligible loans is \$175,520. A copy of the results of this calculation is included as Appendix E.

| Award Year | Ineligible Loan Amount | EAL |
|--------------|------------------------|------------|
| 2011-2012 | \$3,000,554 | \$ 141,787 |
| 2012-2013 | \$2,668,383 | \$ 33,733 |
| Total | | \$175,520 |

Federal Grants

The total amount of Federal Pell Grant and Federal Supplemental Education Grant (FSEOG) funds that UWG improperly disbursed during the 2011-2012 and 2012-2013 award years was \$2,207,369. UWG is also required to reimburse the Department for the Interest/Cost of Funds (COF). The COF is the expense the Department incurred as a result of the institution retaining ineligible Pell Grant and FSEOG funds. The rate of interest is based on when the funds should have been returned to the Department. Please refer to the COF attached as Appendix F.

| Program/Year | Grant Amount | Interest/COF |
|--------------------|--------------------|------------------|
| 2011-12 Pell Grant | \$1,219,745 | \$ 19,806 |
| 2012-13 Pell Grant | \$ 978,874 | \$ 5,924 |
| 2011-12 FSEOG | \$ 5,450 | \$ 80 |
| 2012-13 FSEOG | \$ 3,300 | \$ 21 |
| Subtotal | \$2,207,369 | \$ 25,831 |

Federal Perkins Loan

The total amount of Federal Perkins Loan funds that UWG improperly disbursed during the 2011-2012 and 2012-2013 award years was \$21,246. This amount must be returned to the Perkins Loan Fund as well as \$321 in interest for a total of \$21,567.

Please refer to the below Payment Instructions for detailed steps that the institution must follow to make the necessary adjustments and pay these liabilities.

D. Summary of Liabilities

Below is a summary of the funds to be returned directly to the Department:

| Award Year | Pell Grant | FSEOG | COF | EAL |
|-----------------|--------------------|-----------------|------------------|-------------------|
| 2011-2012 | \$1,219,745 | \$ 5,450 | \$ 19,886 | \$ 141,787 |
| 2012-2013 | \$ 978,874 | \$ 3,300 | \$ 5,945 | \$ 33,733 |
| Subtotal | \$2,198,619 | \$ 8,750 | \$ 25,831 | \$ 175,520 |
| Total | \$2,408,720 | | | |

The total amount to be directly returned to the institution's Federal Perkins Loan fund is \$21,246, plus \$321 in interest for a total of \$21,567.

E. Payment Instructions

PAYMENT INSTRUCTIONS

Federal Award Adjustments

Student-level Pell Grant adjustments must be made prior to UWG's payment of the liability. Because the liability established for this finding is for closed award years, UWG must contact COD School Relations at codsupport@acs-inc.com or by telephone at 1-800-848-0978 to request *extended processing relief* before any student-level adjustments can be processed. Extended processing will allow UWG to transmit student-level Pell Grant adjustments to the Department's Common Origination and Disbursement (COD) System for closed award years.

UWG must perform student-level downward Pell Grant adjustments for each award year for all applicable students listed in its September 30, 2013¹ response submitted to our office. The total adjustments for each award year must match the amounts in the above table.

The student-level adjustments must be made prior to the payment of the liability.

A copy of the adjustment to each student's COD record must be sent to Lisa Lancaster within 45 days of the date of this letter. The institution may choose to email this documentation to lisa.lancaster@ed.gov or via regular mail to:

Lisa Lancaster
U.S. Department of Education – School Participation Division
61 Forsyth Street, S.W. – Room 18T40
Atlanta, GA 30303-8918

Please refer to the enclosed instructions for submitting PII.

Liabilities Owed to the Federal Perkins Loan Fund

Within **45 days of the date of this letter**, UWG must deposit **\$21,567** into its Federal Perkins Loan fund, and, notify each applicable borrower that his or her Perkins Loan balance has been adjusted. Please provide a copy of the notification sent to each borrower as well as a copy of the **\$21,567** deposit to the Perkins Fund. UWG may email this documentation to lisa.lancaster@ed.gov or via regular mail to the above address.

Liabilities Owed to the Department

UWG owes \$2,408,720 to the Department. This liability must be paid using an electronic transfer of funds through the Treasury Financial Communications System, which is known as FEDWIRE. **UWG 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 UWG'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.

¹ UWG's initial response is dated September 30, 2013 but due to the Federal Government shutdown, it was re-submitted October 17, 2013. Please refer to UWG's October 17, 2013 email to Lisa Lancaster for a detailed listing of students and award amounts by term and Title IV program.

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 COD as required by the applicable finding, and remit payment as instructed. 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.

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. UWG 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 UWG's account representative.

If full payment cannot be made within **45 days** of the date of this letter, contact the Department's Accounts Receivable Group to apply for a payment plan. Interest charges and other conditions apply. Written request may be sent to:

U.S. Department of Education
OCFO Financial Management Operations
Accounts Receivable Group
550 12th Street, S.W., Room 6111
Washington, DC 20202-4461

If within **45 days** of the date of this letter, UWG 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 UWG from the Federal Government. **UWG may object to the collection by offset only by challenging the existence or amount of the debt.** To challenge the debt, UWG must **timely appeal** this determination under the procedures described in the "Appeal Procedures" section of the cover letter. The Department will use those procedures to consider any objection to offset. **No separate appeal opportunity will be provided.** If a timely appeal is filed, the Department will defer offset until completion of the appeal, unless the Department determines that offset is necessary as provided at 34 C.F.R. § 30.28. This debt may also be referred to the Department of the Treasury for further action as authorized by the Debt Collection Improvement Act of 1996.

APPENDIX A



July 2, 2013

Beheruz N. Sethna, Ph.D.
President
University of West Georgia
Office of the President
Carrollton, Georgia 30118-4500

UPS Tracking #
1ZA5467Y0190840159

Re: University of West Georgia Letter Dated June 19, 2013
OPE ID #: 00160100

Dear Dr. Sethna:

Thank you for proactively reporting that the University of West Georgia (UWG) was not in compliance with Federal regulations for the calculation of satisfactory academic progress for Title IV recipients. 34 C.F.R. §§ 668.16 (e), 668.32, and 668.34 of the Student Assistance General Provisions require institutions to establish, publish, and apply reasonable standards for measuring whether an otherwise eligible student is maintaining satisfactory academic progress (SAP) in his or her educational program.

The Department published amendments to SAP on October 29, 2010, which became effective on July 1, 2011. Among those changes, one significant modification was that a student's academic progress is evaluated—

- At the end of each payment period if the educational program is either one academic year in length or shorter than an academic year; or
- For all other educational programs, at the end of each payment period or at least annually to correspond with the end of a payment period.

Regardless these modifications, Title IV regulations have always required that a student's determination of SAP be based on a cumulative basis. In order to correct its determination of SAP for Title IV recipients, UWG must take corrective actions outlined in this letter.

We are making the following recommendation to the *draft* UWG Financial Aid SAP policy submitted to Lisa Lancaster of my staff:

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

Atlanta School Participation Division
61 Forsyth St. SW, Room 18T40
Atlanta GA 30303-8918

- The 'Appeals' section of the SAP policy should be expanded to include examples of extenuating circumstances such as: a student's injury or illness, serious illness or the death of a relative, or other special circumstances. The student's appeal must also explain why he or she failed to make SAP and what has changed in his situation that will allow him to make satisfactory progress at the next evaluation.

Once finalized, UWG must apply the corrected SAP policy to all new and returning Title IV recipients for the Fall 2011 semester and subsequent evaluation periods. Your review must provide for the calculation of qualitative and quantitative standards by dividing the cumulative number of hours the student has successfully completed by the cumulative number of hours the student has attempted. Please be sure to include grades of incomplete, withdrawal, transfer and repeat courses in the calculation. In accordance with its policy, the institution may allow for *warning, probation and approved appeals*; however, retroactive appeals of eligibility for Title IV aid may not be permitted.

In cases where students remain eligible for Title IV aid, no further action is required. However if Title IV aid was disbursed for a term in which a student was not meeting SAP, those funds must be reported as ineligible (by program). Please provide the following data in an Excel spreadsheet (or similar format), by term, in alphabetical order:

- Student last, first name and social security number
- Date aid was disbursed to the student or account*
- Amount of Federal Pell Grant
- Amount of Federal Supplemental Education Opportunity (FSEOG)
- Amount of Subsidized Federal Direct Loan (FDL)
- Amount of Unsubsidized FDL
- Amount of Parent Loan for Undergraduate Students (PLUS)
- Amount of Federal Perkins Loan
- Amount of TEACH Grant

| <u>Spring 2012</u> | | | | | | | | | |
|---|-----|-----------------|------|-------|-----|-------|------|---------|-------|
| Title IV Disbursed For An Ineligible Determination of SAP Appeal | | | | | | | | | |
| NAME | SSN | Date Disbursed* | PELL | FSEOG | SUB | UNSUB | PLUS | PERKINS | TEACH |
| | | | | | | | | | |

**You may use a common disbursement date for all students for the term*

Please send the file review summary report (spreadsheets) to Lisa Lancaster by e-mail at lisa.lancaster@ed.gov. See the enclosure Protection of Personally Identifiable Information for instructions regarding electronic submissions to the Department for data containing PII. Separate from the institution's spreadsheet, please email an access password to Ms. Lancaster.

University of West Georgia
OPE ID: 00160100

The results of UWG's review must be provided within **60** days of receipt of this letter. Please submit any hardcopy documentation to the following address:

U.S. Department of Education
Atlanta School Participation Division
61 Forsyth Street, Room 18T40
Atlanta, GA 30303-8918
Attention: Lisa Lancaster

Upon receipt of UWG's complete file review, our office will evaluate the results and determine the best course of action necessary to close out this issue. Once that determination has been made, our office will contact you to discuss those actions.

If you have any questions regarding this matter, please feel free to contact Lisa Lancaster at (404) 974-9296.

Sincerely,

(b)(6)

Charles L. Engstrom,
Division Director

cc: John Fuchko, University System of Georgia
Chancellor Hank Huckaby, University System of Georgia

APPENDIX B



March 18, 2014

Kyle Marrero
President
University of West Georgia
1601 Maple Street
Carrollton, Georgia 30118-4500

UPS Next Day Air
1ZA879640297569822

RE: Program Review Report
OPE ID: 00160100
PRCN: 201420428524

Dear Dr. Marrero:

During a June 13, 2013 meeting, University of West Georgia (UWG) officials reported to the U.S. Department of Education (the Department) School Participation Division – Atlanta, that the institution was not in compliance with Federal regulations for the calculation of satisfactory academic progress for Title IV, HEA recipients as prescribed by 34 C.F.R. §§ 668.16 (e), 668.32, and 668.34 of the Student Assistance General Provisions. On June 19, 2013, the former president of UWG, Dr. Sethan, issued a letter to the Department to provide a description of the institution's erroneous interpretation of the regulations, and, the preliminary impact on student-eligibility for Title IV funds.

Lisa Lancaster, a representative of the Department, conducted a review of UWG's policies and procedures as they pertain to the calculation of satisfactory academic progress for Title IV recipients. The finding of this review is 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 refer to the enclosed report.

Please note that pursuant to HEA section 498A (b), the Department is required to:

- (1) Provide to the institution an adequate opportunity to review and respond to any preliminary program review report¹ and relevant materials related to the report before any final program review report is issued; and,

¹ A "preliminary" program review report is the program review report. The Department's final program review report is the Final Program Review Determination (FPRD).

Federal Student Aid

Atlanta School Participation Division
61 Forsyth St., SW, Room 18T40
Atlanta, GA 30303-8918

- (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 Final Program Review Determination (FPRD). However, it will be retained and available for inspection by UWG 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 UWG is issued.

The institution's response should be sent directly to Lisa Lancaster of this office within 30 calendar days of receipt of this letter.

Record Retention:

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

We would like to express our appreciation for the courtesy and cooperation extended during the review. Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact Lisa Lancaster at: (404) 974-9296 or at lisa.lancaster@ed.gov.

Sincerely,

(b)(6)

Chris Miller
Compliance Manager

cc: Dr. Philip Hawkins, Director of Financial Aid

Enclosure

University of West Georgia
OPE ID: 00160100
PRCN: 201420428524
Page 1

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

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Prepared for
University of West Georgia

OPE ID: 00160100
PRCN: 201420428524

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

Program Review Report

March 18, 2014

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A. Institutional Information

University of West Georgia
1601 Maple Street
Carrollton, Georgia 30118-4420

Type: Public

Highest Level of Offering: Doctoral Degree

Accrediting Agency: Southern Association of Colleges and Schools Commission on Colleges

Current Student Enrollment: 11,929 (2013-2014)

% of Students Receiving Title IV: 77% (2013-2014)

Title IV Participation:

| <u>Program / Funding</u> | <u>2013-2014</u> |
|--|------------------|
| Federal Direct Loan (FDL) | \$71,130,057 |
| Federal Pell Grant (Pell) | \$21,715,322 |
| Federal Supplemental Education Grant (FSEOG) | \$ 182,000 |
| Federal Work Study (FWS) | \$ 152,880 |
| Federal Perkins Loan (Perkins) | \$ 17,800 |

| | | |
|-------------------|------|------|
| Default Rate FDL: | 2011 | 8.2% |
| | 2010 | 4.8% |
| | 2009 | 5.3% |

| | | |
|-----------------------|------|-------|
| Default Rate Perkins: | 2013 | 17.4% |
| | 2012 | 30.6% |
| | 2011 | 25.4% |

B. Scope of Review

In June 2013, University of West Georgia (UWG) officials self-reported deficiencies in monitoring the academic progress of Title IV recipients. In response, the Department issued a letter to UWG on July 2, 2013. The July 2, 2013 letter required the institution to correct its Satisfactory Academic Progress (SAP) policies and procedures used to monitor the eligibility of funds for Title IV recipients.

The focus of the program review as related to the self-reported error consisted of an examination of UWG's revised SAP policies and procedures as well as the application of the revised SAP policy and its effect on Title IV recipients from the 2011-2012 and 2012-2013 award years.

Disclaimer:

The program review focused on UWG's correct determination of SAP for Title IV recipients. Therefore, the review cannot be assumed to be all-inclusive. The absence of statements in the report concerning UWG's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, the program review does not relieve UWG of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

This report reflects an initial finding. The finding is not final. The Department will issue its final determination in a subsequent Final Program Review Determination letter.

C. Findings

During the review, a significant area of noncompliance was noted. Findings of noncompliance are referenced to the applicable statutes and regulations, and specify the actions to be taken by an institution to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding 1: Satisfactory Academic Progress – Calculation Error

Citation:

Student Assistance General Provisions 34 C.F.R. §§ 668.16 (e), 668.32, and 668.34 require institutions to establish, publish, and apply reasonable standards for measuring whether an otherwise eligible student is maintaining satisfactory academic progress (SAP) in his or her educational program. The Secretary considers an institution's standards to be reasonable if the standards—

- Are the same as or stricter than the institution's standards for a student enrolled in the same educational program who is not receiving Title IV assistance.
- The policy provides for consistent application of standards to all students within categories of students, *e. g.*, full-time, part-time, undergraduate, and graduate students, and educational programs established by the institution.
- The policy provides that a student's academic progress is evaluated—
 - At the end of each payment period if the educational program is either one academic year in length or shorter than an academic year; or
 - For all other educational programs, at the end of each payment period or at least annually to correspond with the end of a payment period;
- The policy specifies a qualitative standard, or grade point average (GPA) that a student must achieve at each evaluation (if a GPA is not an appropriate qualitative measure, a comparable assessment measured against a norm).
- If a student is enrolled in an educational program of more than two academic years, the policy specifies that at the end of the second academic year, the student must have a GPA of at least a “C” or its equivalent.
- The policy specifies a quantitative standard, or the pace at which a student must progress through his or her educational program to ensure that he will complete the program within the maximum timeframe, and provides for measurement of the student's progress at each evaluation. For an undergraduate program maximum timeframe means a period that is no longer than 150% of the published length of the educational program. For a graduate program, it means a period defined by the institution that is based on the length of the program.
- An institution calculates the pace at which the student is progressing by dividing the cumulative number of hours the student has successfully completed by the cumulative number of hours the student has attempted.
- The policy describes how a student's GPA and pace of completion are affected by course incompletes, withdrawals, repetitions, or transfers of credit from other institutions. Credit hours from another institution that are accepted toward the student's educational program must count as both attempted and completed hours. An SAP policy cannot exclude courses in which a student remained past the

add/drop period and earned a grade of 'W', nor can it routinely exclude certain hours attempted, such as those taken during a summer term. All periods of the student's enrollment count when assessing progress, even periods in which the student did not receive Title IV funds.

- The policy provides that, at the time of each evaluation, a student who has not achieved the required GPA, or who is not successfully completing his or her educational program at the required pace, is no longer eligible to receive assistance.
- If the institution places students on financial aid warning, or on financial aid probation, the policy describes these statuses as—
 - Financial aid warning is a status assigned to a student who fails to make SAP only at an institution that evaluates academic progress at the end of each payment period. Financial aid warning may be assigned without an appeal or other action by the student. It is good for one payment period.
 - Financial aid probation is a status assigned by an institution to a student who fails to make SAP but who has appealed, and has had eligibility for aid reinstated. A student on financial aid probation may receive Title IV funds for one payment period. However, a student on financial aid probation may not receive Title IV funds for the *subsequent* payment period unless the student makes satisfactory academic progress or the institution places him on probation and develops an academic plan.
- If the school permits appeals, the policy must explain that the student may appeal on the basis of: his injury or illness, the death of a relative, or other special circumstances. The appeal must also explain why he or she failed to make satisfactory progress and *what has changed* in his situation that will allow him to make satisfactory progress at the next evaluation.
- If the institution does not permit a student to appeal a determination that he or she is not making SAP, the policy must describe how the student may reestablish his or her eligibility to receive assistance under the Title IV programs.
- The institution must have a policy to notify students of the results of an SAP evaluation that affects his or her eligibility for funds.

Noncompliance:

Upon reviewing the institution's financial aid policies and procedures, UWG's (newly hired) financial aid director discovered that the school's process to determine whether or not Title IV recipients were making SAP was not in compliance with the above regulations. Rather than a student's pace being calculated on a cumulative basis as required, the institution's determination of a student's pace for his or her program of study was based on a per-term basis. While this error may have resulted in some students

not receiving aid when they should have, it also resulted in the institution awarding and disbursing aid to those who were ineligible.

Required Action:

UWG officials were required to correct the institution's method to determine a student's quantitative measurement of SAP on a cumulative basis. Next, officials were instructed to apply the revised policy to all students who received any type of Title IV aid between the Fall 2011 and Summer 2013 terms, and reevaluate each student's qualitative and quantitative progress on a payment period basis. (Students who received Title IV aid for the current award year have been awarded according to the corrected policy.)

UWG reevaluated SAP for all students who received Title IV aid between the Fall 2011 and Summer 2013 terms. The school's response is being reviewed by the Department. Repayment Instructions will be provided to the institution following the completion of our review of UWG's records.

The institution is not required to respond to this report unless it wishes to provide additional information with reference to this finding.

APPENDIX C



Department of Financial Aid
Carrollton, Georgia 30118-4420
Division of Student Affairs and Enrollment Management

September 30, 2013

US Department of Education
Atlanta School Participation Division
61 Forsyth Street, Room 18T40
Atlanta, GA 30303-8918

ATTN: Lisa Lancaster, Institutional Improvement Specialist

Dear Lisa,

Please find enclosed a USB drive that contains a single Microsoft Excel spreadsheet entitled "UWGSAP." This single spreadsheet contains six workbooks for each of the following terms of enrollment:

Fall 2011
Spring 2012
Summer 2012
Fall 2012
Spring 2013
Summer 2013

Data on students who were improperly paid Federal Student Aid funds due to the previous UWG SAP policy is contained in each of these workbooks. I sent the password for both the WinZip file and for the Microsoft Excel file to you in a separate email earlier today.

Please advise if you need additional details. We look forward to hearing back from you soon regarding next steps in this process.

Sincerely,

A handwritten signature in black ink that reads "Philip E. Hawkins".

Philip E. Hawkins, Ph.D.
Director of Financial Aid

APPENDIX D



Office of the President
Carrollton, Georgia 30118-4500

April 3, 2014

Ms. Lisa Lancaster, Senior Institutional Review Specialist
School Participation Division - Atlanta
US Department of Education
61 Forsyth Street, Room 18T40
Atlanta, GA 30303

RE: Program Review Report
OPE ID: 00160100
PRCN: 201420428524

Dear Ms. Lancaster,

The University of West Georgia (UWG) has received the recent Program Review Report concerning the matter of Satisfactory Academic Progress (SAP). We have reviewed the letter and have no further information to provide. Since our discovery and disclosure of this matter to you last Spring/Summer, UWG has implemented corrective actions regarding this matter, and we remain committed to maintaining compliance with all Federal Student Aid regulations.

As part of the University System of Georgia (USG), both UWG and the USG are committed to continuous process improvement and compliance with Federal Student Aid regulations, as evidenced by a recently engaged system-wide audit of Financial Aid practices by the USG Board of Regents Office of Internal Audit and Compliance. This USG system-wide audit will engage each USG institution and will include within its scope policies and procedures as well as data analysis related to measurement and evaluation of Satisfactory Academic Progress.

We are very appreciative of your courtesy and resourcefulness during the process of this Program Review. We are eager to hear from you regarding requirements for final resolution of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "KM", with a long horizontal flourish extending to the right.

Dr. Kyle Marrero
President

cc: Dr. Scot Lingrell, Vice President for Student Affairs & Enrollment Management
Dr. Philip Hawkins, Director of Financial Aid
Mr. Jim Sutherland, Vice President for Business and Finance
Dr. John Head, Associate Vice President for Enrollment Management
Mr. Ron Richards, Director of Internal Audit
Mr. John Fuchko, Chief Audit Officer and Associate Vice Chancellor, USG

Appendix E- Estimated Loss Formula

Estimated Loss Formula

9/16/2013

Enter Institution Name U.W.G.

Select Institution Type 4 Yr

| Select Type of Loan | Select Award Year | Enter Ineligible Loan Amount | Enter School CDR | Total Subsidy Costs | Estimated Loss Liability |
|---|-------------------|------------------------------|-----------------------------|---------------------|--------------------------|
| 1 DL Subsidized | 2011-2012 | \$ 1,293,857.00 | 8.20% | 10.96% | \$ 141,787.47 |
| 2 DL Unsubsidized | 2011-2012 | \$ 1,452,865.00 | 8.20% | -24.63% | \$ - |
| 3 DL PLUS | 2011-2012 | \$ 253,832.00 | 8.20% | -43.65% | \$ - |
| Description | | \$ 3,000,554.00 | | | \$ 141,787.47 |
| 4 DL Subsidized | 2012-2013 | \$ 1,056,312.00 | 8.20% | 3.19% | \$ 33,732.84 |
| 5 DL Unsubsidized | 2012-2013 | \$ 1,426,756.00 | 8.20% | -25.22% | \$ - |
| 6 DL PLUS | 2012-2013 | \$ 185,315.00 | 8.20% | -44.39% | \$ - |
| Description | | \$ 2,668,383.00 | | | \$ 33,732.84 |
| 7 | | | | | |
| 8 | | | | | |
| 9 | | | | | |
| Description | | \$ - | | | \$ - |
| 10 | | | | | |
| 11 | | | | | |
| 12 | | | | | |
| Description | | \$ - | | | \$ - |
| Original Ineligible Loan Liability | | \$ 5,668,937.00 | Total Estimated Loss | | \$ 175,520.31 |

Appendix E- Estimated Loss Formula

To calculate estimated loss for a given ineligible loan amount, that amount is multiplied by the total subsidy rates calculated for the ineligible loans. Consolidation Loans will be obtained in the future to prepay some of the ineligible loans; the amount of Consolidation Loans divided by the ineligible Stafford/PLUS loans equals the "Consolidation prepayment rate" (H) for those loans.

The Department's Budget Office calculates, on an annual basis, the rate per dollar of loan of default subsidies (DSRs) and all other subsidies (OSRs) (D & F) for Stafford and PLUS Loans, by cohort year, program, loan type, and risk group (note that 2008-2010 FFEL loan costs are calculated only by cohort year).

| | A | B | C | D | E | F | G | H | I | J |
|----|------------|-------------|----------|---------|--------------|---------|---------------|---------------|--------------|-------------|
| | School CDR | Sector CDR* | Ratio ** | DSR *** | Adjusted DSR | OSR *** | Avg Cons Year | Cons Prepay % | Cons DSR *** | Cons OS *** |
| 1 | 8.20% | 7.78% | 1.05 | 0.39% | 0.41% | 6.49% | 2018 | 31.8% | 2.64% | 10.13% |
| 2 | 8.20% | 7.78% | 1.05 | 1.29% | 1.35% | -27.91% | 2018 | 40.2% | 3.07% | 1.74% |
| 3 | 8.20% | 7.78% | 1.05 | 0.94% | 0.99% | -37.50% | 2017 | 29.7% | 1.80% | -25.85% |
| 4 | 8.20% | 7.78% | 1.05 | 1.14% | 1.20% | -2.51% | 2019 | 31.8% | 2.71% | 11.46% |
| 5 | 8.20% | 7.78% | 1.05 | 1.24% | 1.30% | -29.50% | 2019 | 40.2% | 3.07% | 4.34% |
| 6 | 8.20% | 7.78% | 1.05 | 0.95% | 1.00% | -39.03% | 2018 | 30.0% | 2.15% | -23.38% |
| 7 | | | | | | | | | | |
| 8 | | | | | | | | | | |
| 9 | | | | | | | | | | |
| 10 | | | | | | | | | | |
| 11 | | | | | | | | | | |
| 12 | | | | | | | | | | |

Federal Student Aid (FSA) calculates the cohort default rates (CDRs) of the institution (A), and the average CDR for the sector for that institution (B). FSA applies the CDR comparison ratio (C), $[A/B = C]$ against the Budget Office's cohort loan DSR (D) to determine the default subsidy rate for the institution (E). The Budget Office estimates the default subsidy rate and other subsidy rate for the Consolidation Loans that will prepay some of these Stafford and PLUS Loans (I & J).

The total subsidy rate for the ineligible Stafford and PLUS Loans is $((E+F) + ((I+J) \times H))$.

The total subsidy cost for these loans is the ineligible loan amount multiplied by the total subsidy rate.

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

Name of Institution: U.W.G. Appendix F

| No. | Description/Name | Ineligible Disbrsmnt | Program | Disbursement Date | Return Paid Date | No. of Days | Imputed CVFR | Federal Share | To ED | To Inst Accounts |
|-------------|------------------|----------------------|------------------|-------------------|------------------|-------------|--------------|---------------|--------------|------------------|
| Fall 2011 | | \$723,994.00 | Pell Grant | 8/28/2011 | 6/13/2013 | 655 | 1.00% | \$ 723,994.00 | \$ 12,993.52 | \$ - |
| Fall 2011 | | \$2,500.00 | FSEOG-No Match | 8/28/2011 | 6/13/2013 | 655 | 1.00% | \$ 2,500.00 | \$ 44,874.00 | \$ - |
| Fall 2011 | | \$12,496.00 | Perkins-No Match | 8/28/2011 | 6/13/2013 | 655 | 1.00% | \$ 12,496.00 | \$ - | \$ 224.27 |
| Spring 2012 | | \$440,065.00 | Pell Grant | 1/12/2012 | 6/13/2013 | 518 | 1.00% | \$ 440,065.00 | \$ 6,245.93 | \$ - |
| Spring 2012 | | \$1,350.00 | FSEOG-No Match | 1/12/2012 | 6/13/2013 | 518 | 1.00% | \$ 1,350.00 | \$ 19.16 | \$ - |
| Spring 2012 | | \$3,500.00 | Perkins-No Match | 1/12/2012 | 6/13/2013 | 518 | 1.00% | \$ 3,500.00 | \$ - | \$ 49.68 |
| Summer 2012 | | \$55,686.00 | Pell Grant | 6/7/2012 | 6/13/2013 | 371 | 1.00% | \$ 55,686.00 | \$ 566.07 | \$ - |
| Summer 2012 | | \$1,600.00 | FSEOG-No Match | 6/7/2012 | 6/13/2013 | 371 | 1.00% | \$ 1,600.00 | \$ 16.26 | \$ - |
| Summer 2012 | | \$2,500.00 | Perkins-No Match | 6/7/2012 | 6/13/2013 | 371 | 1.00% | \$ 2,500.00 | \$ - | \$ 25.41 |
| Fall 2012 | | \$554,841.00 | Pell Grant | 8/27/2012 | 6/13/2013 | 290 | 1.00% | \$ 554,841.00 | \$ 4,408.77 | \$ - |
| Fall 2012 | | \$2,750.00 | FSEOG-No Match | 8/27/2012 | 6/13/2013 | 290 | 1.00% | \$ 2,750.00 | \$ - | \$ 16.69 |
| Fall 2012 | | \$2,750.00 | Perkins-No Match | 8/27/2012 | 6/13/2013 | 290 | 1.00% | \$ 2,750.00 | \$ - | \$ 21.85 |
| Spring 2013 | | \$376,105.00 | Pell Grant | 1/18/2013 | 6/13/2013 | 146 | 1.00% | \$ 376,105.00 | \$ 1,504.57 | \$ - |
| Spring 2013 | | \$1,200.00 | FSEOG-No Match | 1/18/2013 | 6/13/2013 | 146 | 1.00% | \$ 1,200.00 | \$ 4.80 | \$ - |
| Spring 2013 | | \$0.00 | Perkins-No Match | 1/18/2013 | 6/13/2013 | 146 | 1.00% | \$ - | \$ - | \$ - |
| Summer 2013 | | \$47,928.00 | Pell Grant | 6/5/2013 | 6/13/2013 | 8 | 1.00% | \$ 47,928.00 | \$ 10.51 | \$ - |
| Summer 2013 | | \$0.00 | FSEOG-No Match | 6/5/2013 | 6/13/2013 | 8 | 1.00% | \$ - | \$ - | \$ - |
| Summer 2013 | | \$0.00 | Perkins-No Match | 6/5/2013 | 6/13/2013 | 8 | 1.00% | \$ - | \$ - | \$ - |

| | |
|------------------|-----------------|
| Total Ineligible | \$ 2,228,615.00 |
| Totals | \$ 25,831.15 |
| ACA Liability | \$ 321.21 |

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

| | |
|-----------------|--|
| Federal FWS | |
| Federal SEOG | |
| Federal Perkins | |

| | |
|-----------------|------|
| Total C-B Spent | \$ - |
| ACA Percentage | |

| | |
|-----------------|-----------------|
| Total | Federal Share |
| \$ 2,198,619.00 | \$ 2,198,619.00 |
| \$ - | \$ - |
| \$ - | \$ - |
| \$ - | \$ - |
| \$ - | \$ - |
| \$ - | \$ - |

Interest Breakdown

| | |
|------------------|--------------|
| Pell Grants | \$ 25,729.37 |
| ACG | \$ - |
| SMART | \$ - |
| TEACH | \$ - |
| FWS | \$ - |
| FSEOG | \$ - |
| Perkins | \$ - |
| FWS-50% Match | \$ - |
| FWS-No Match | \$ - |
| FSEOG-No Match | \$ 101.78 |
| Perkins-No Match | \$ - |
| ACA Breakdown | \$ 321.21 |

| | |
|-------|--|
| FWS | |
| FSEOG | |

| | | |
|---------------------------|---------------------|---------------------|
| Perkins | \$ - | \$ - |
| FWS-50% Match | \$ - | \$ - |
| FWS-No Match | \$ - | \$ - |
| FSEOG-No Match | \$ 8,750.00 | \$ 8,750.00 |
| Perkins-No Match | \$ 21,246.00 | \$ 21,246.00 |
| Total Campus-Based | \$ 29,996.00 | \$ 29,996.00 |

| | |
|------------------|--|
| Perkins | |
| FWS-50% Match | |
| FWS-No Match | |
| FSEOG-No Match | |
| Perkins-No Match | |