



April 7, 2014

Ms. Elaine McQueen
President
W. L. Bonner College
4430 Argent Court
Columbia, SC 29203

UPS # 1ZA879640297862273

RE: **Final Program Review Determination**
OPE ID 03856400
PRCN 201330428333

Dear Ms. McQueen:

The U.S. Department of Education's (Department's) School Participation Division – Atlanta issued a program review report on October 23, 2013 covering W. L. Bonner's (WLBC) administration of programs authorized by Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2011-2012 and 2012-2013 award years. WLBC's final response was received on March 4, 2014. A copy of the program review report (and related attachments) and WLBC's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by WLBC 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 of this program review report, (2) provide instructions for payment of liabilities to the Department, (3) notify the institution of its right to appeal and (4) close the review.

The total liabilities due from the institution from this program review are \$23,147.

This final program review determination contains detailed information about the liability determination for all findings.

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

Federal Student Aid

AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

School Participation Division Atlanta

61 Forsyth St SW, Suite 18T40, Atlanta, GA 30303

findings in the attached report does not contain any student PII. Instead, each finding references students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Student Sample. In addition, Appendices A-D numbers also contain PII. These appendices were encrypted and sent separately to the institution via e-mail.

Appeal Procedures:

This constitutes the Department's FPRD with respect to the liabilities identified from the October 23, 2013 program review report. If WLBC 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 WLBC receives this FPRD. An original and four copies of the information WLBC 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

WLBC'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 FPRD. 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 WLBC'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). rgrtrt

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. 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)

Christopher Miller
Division Director

Enclosure:

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

cc: Ms. Natacha Davis, Financial Aid Administrator
State Agency: SC Commission On Higher Education
Accrediting Agency: Accrediting Association of Bible Colleges

Prepared for
W. L. Bonner College

Federal Student Aid
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OPE ID: 03856400
PRCN: 201330428333

Lynette Davis
U.S. Department of Education
Federal Student Aid
School Participation Division - Atlanta

Final Program Review Determination
April 7, 2014

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A. Institutional Information

W. L. Bonner College
4430 Argent Court
Columbia, SC 29203

Type: Private, Nonprofit

Highest Level of Offering: Bachelor's Degree

Accrediting Agency: Accrediting Association of Bible Colleges

Current Student Enrollment: 2012/2013 was 31

% of Students Receiving Title IV: 98%

Title IV Participation	<u>2011/2012</u>
Federal Pell	\$ 75,749
William D. Ford Federal Direct Loan Program (Direct Loan)	\$227,732
Supplemental Education Opportunity Grant (SEOG)	\$ 3,900
Federal Work Study (FWS)	\$ 1,294

Default Rate FFEL/DL: 0

The Institution has not been in the program long enough to generate a default rate.

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at W. L. Bonner College, (WLBC) from June 3-7, 2013. The review was conducted by Ms. Lynette Davis, Mr. Oscar Howard and Mr. Lonnie Seal.

The focus of the review was to determine WLBC'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 WLBC'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 31 files was identified for review from the 2011/12 and 2012/13 (year to date) award years. The total population receiving Title IV, HEA program funds for both award years was reviewed because there were only 31 students enrolled. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review

Disclaimer:

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

C. Findings and Final Determinations

Resolved Findings

WLBC has taken the corrective actions necessary to resolve findings 3, 4, and 7-14 of the program review report. Therefore, these findings may be considered closed. The finding requiring further action by WLBC is discussed below.

Findings with Final Determination

The program review report finding requiring further action is summarized below. At the conclusion of the finding is a summary of the response to the finding, and the Department's final determination for that finding. A copy of the program review report issued on is attached as Appendix B.

Note: Any additional costs to the Department, including interest, special allowances, cost of funds, unearned administrative cost allowance, etc., are not included in individual findings, but instead are included in the summary of liabilities table in Section D of the report.

FINDING 1: INCORRECT DISBURSEMENTS OF FEDERAL PELL GRANTS

Citation:

Pursuant to 34 C.F.R. § 690.63, of the Federal Pell Grant Program, an institution without fixed terms must first find the length of the payment periods before a student's Federal Pell Grant can be calculated. Once the payment period has been determined, the institution must multiply the student's Scheduled Award by the hours in the payment period, divided by the hours in the academic year. A student can receive only one Scheduled Award in an award year.

In a program with non-standard academic terms, the payment period does not end until the student has completed all of the work paid for in the first payment period. Each subsequent payment period begins only when the previous one ends. A student may not be paid a Federal Pell Grant for that subsequent payment period until the student has completed all of the clock or credit hours and number of weeks in the first payment period.

Area of Noncompliance:

The following students received incorrect disbursements of Federal Pell Grant funds:

Student 2: This student was paid as a full time student for spring the semester. For the 2012/2013 award year, the student received \$2,775 in Federal Pell Grant funds. He should have been paid \$1,388 as a half time student. The student was overpaid \$1,387 for award year 2012/2013.

Student 3: This student was enrolled as a three quarter time student for fall semester of the 2011/2012 award year and was paid \$2,775 as a full time student from Federal Pell Grant funds. He should have been paid \$2,082. He was overpaid the amount of \$693 for award year 2011/2012.

Student 5: This student was paid as a three quarter time student for the 2011/2012 spring semester and received \$1,725 from Federal Pell Grant program. He should have been paid the amount of \$1,150 as a half time student. The student was overpaid \$575 for the 2011/2012 award year. For spring semester 2012/2013, this student was paid based on full time enrollment, but should have been paid based on three quarter time enrollment. He received \$2,750 but should have received \$2,063. He was overpaid \$687 for the 2012/2013 award year. He was overpaid a total of \$1,262 for both award years.

Student 15: This student was enrolled as a three-quarter time student in 2011/2012 the fall semester. He should have received \$2,063 in Federal Pell Grant funds. He was paid \$2,750 as a full time student. He was overpaid \$687 for the 2011/2012 award year. For the 2012/2013 award year, he was enrolled in 4 credit hours for fall semester, but was paid as a half-time

student. He was paid Federal Pell Grant funds of \$1,375, but should have been paid \$688 as a less than half time student. He was overpaid \$687 for the 2012/2013 award year. The total over payment for both award years was \$1,374.

Student 16: This student was paid as a full time student for 2012/2013 spring semester and received \$2,775 in Federal Pell Grant funds. He should have been paid \$1,388 as a half time student. The student was overpaid \$1,387 for the 2012/2013 award year.

Student 17: This student was paid as a half-time student for the fall semester 2012/2013 award year and received the amount of \$1,388 in Federal Pell Grant program funds. He should have been paid \$694 as a less than half time student. The student was overpaid the amount of \$694 for the 2012/2013 award year.

Student 18: This student was paid \$1,400 from the Federal Pell Grant program as a full time student for fall semester 2011/2012 and was enrolled as a three quarter time student for fall semester 2011. She should have been paid \$1,050. She was overpaid the amount of \$350 for the 2011/2012 award year.

Student 19: This student was enrolled as a half-time student for fall semester of the 2011/2012 award year and received Federal Pell Grant funds of \$2,082 as a three-quarter time student. He should have received \$1,388 as a half time student. He was overpaid \$694 for fall term of the 2011/2012 award year.

Student 24: This student was enrolled in the certificate program, Christian Ministries, which is 30 credit hours and 32 weeks in length. The student could only receive one Federal Pell Grant because the school's academic year is 24 credit hours and 30 weeks in length. For the 2012/2013 award year, she was enrolled as a half time student for fall semester and was paid \$1,388. For the spring semester she was enrolled as a less than half time student and received \$1,387 but should have received \$694. The student was overpaid the amount of \$693 for 2012/2013 award year.

Student 28: This student was enrolled as a three-quarter time student for the fall term of the 2012/2013 award year and received Federal Pell Grant funds of \$2,775 as a full time student. He should have received \$2,081 as three-quarter time student. He was overpaid \$694 for fall term of the 2012/2013 award year.

Student 30: This student was disbursed \$2,775 in Federal Pell Grant funds as a full time student for the fall semester 2011/2012 award year but should have been disbursed \$2,081 as a three quarter time student. He was overpaid \$694 for the 2011/2012 award year. He was paid \$2,775 as a full time student for fall semester 2012, but was enrolled three quarter time and should have received \$2,081. For spring semester he was paid \$2,775 as a full time student but should have been paid \$1,388 as a half time student. He was overpaid the amount of \$2,081 for the 2012/2013 award year. The total overpayment for both award years is \$2,775.

Required Action:

For student 26, the institution had until September 30, 2013 to make the adjustment and pay the student the correct disbursement. Also, for any other student under paid for the 2012/2013 award year the institution had until the same date to make adjustments. The Financial Aid Director was advised of this required action to make the adjustments before the September 30, 2013 dead line.

The program review team reviewed all students enrolled for the 2011/2012 and 2012/2013 award years. In addition to the above students, the institution was required to recalculate Federal Pell Grant awards for all students enrolled after the program review to determine the extent of any further over awards or under awards which occurred due to the institution's improper calculations.

A report detailing the results of the institution's review was to be submitted in the following format via diskette and/or submitted electronically.

1. Student's Name and Social Security Number
2. Award Year
3. Federal Pell Grant Disbursed
4. Recalculated Federal Pell Grant
5. Overaward

Also, the institution was required to submit with its response, procedures which would ensure that, in the future, the Federal Pell Grant funds would be accurately calculated and consistently applied to all students.

WLBC's Response:

Student 2: This student was enrolled full time for fall and spring semesters 2012/2013.

Student 3: This student was enrolled at three quarter time fall 2011 semester.

Student 5: This student was enrolled at three quarter time fall 2012 semester. This student was enrolled at three quarter time spring 2013.

Student 15: This student was confirmed and enrolled at three quarter time fall 2011 semester. Please see supporting document(s). He was only enrolled in 4 credits hours for fall semester 2012.

Student 16: This student was only enrolled in 7 credit hours spring 2013 semester. Please note: an error was made by the third party processor for the spring 2013 semester.

Student 17: This student did not receive Federal Pell Grant funds for the fall 2012 semester. Please see supporting document(s).

Student 18: This student was enrolled at three quarter time fall 2011 semester.

Student 19: This student was enrolled at half time fall 2011 semester.

Student 24: (No response)

Student 28: This student was enrolled at half time fall 2012 semester

Student 30: This student enrolled as a three quarter time student fall 2011. The student was initially confirmed as a full time student fall 2012 semester but an adjustment was made reflecting three-quarter time and funds were reduced by \$693.00 and returned. Please see supporting documents. The student was enrolled three quarter time for the spring 2013 semester. Please note: an error was made by the third party processor for the spring 2013 semester.

Student 6: This student was enrolled half-time fall 2011 and enrolled three-quarter time spring 2012. The third party servicer processed each semester according to information provided at a rate of calculation per our cost of attendance.

Student 26: This student was enrolled three quarters time in the fall 2012 semester and full time in the spring 2013 semester. Please note: an error was made by the third party processor for the spring 2013 semester.

There were no other Federal Pell Grant awards beyond the programs review. Therefore, no other calculations or recalculation would be necessary for said period. The results of the institution's review have concluded that no other actions are warranted.

Final Determination:

After reviewing the institution's response to the finding, the institution provided documentation to resolve the liabilities for students 2, 6, 17, and 26. The following determinations were made:

Student 3: This student was enrolled as a three quarter time student for 2011/2012 fall semester and was paid \$2,775 as a full time student from Federal Pell Grant. He should have been paid \$2,082. He was overpaid the amount of \$693 for award year 2011/2012.

Student 5: For spring semester 2012/2013, the student was paid based on full time enrollment, but should have been paid based on three quarter time enrollment. He received \$2,750 but should have received \$2,063. He was overpaid \$687 for the 2012/2013 award year.

Student 15: This student was enrolled as a three-quarters time student fall semester 2011/2012. He should have received \$2,063 for fall from Federal Pell Grant funds. He was paid \$2,750 as a full time student. He was overpaid \$687 for the 2011/2012 award year. For the 2012/2013 award year, he was enrolled in 4 credit hours for fall semester, but was paid as a half-time student. He was paid \$1,375 in Federal Pell Grant funds but should have been paid \$688 as a less than half time student. He was overpaid \$687 for the 2012/2013 award year. The total over payment for both award years was \$1,374.

Student 16: This student was paid as a full time student for spring semester 2012/2013 and received \$2,775 in Federal Pell Grant funds. He should have been paid the amount of \$1,388 as a half time student. The student was overpaid \$1,387 for the 2012/2013 award year.

Student 18: This student was paid the amount of \$1,400 in Federal Pell Grant funds as a full time student for fall semester 2011/2012 and was enrolled as a three quarter time student for fall semester 2011. She should have been paid the amount of \$1,050. She was overpaid the amount of \$350 for the 2011/2012 award year.

Student 19: This student was enrolled as a half-time student for the fall semester of the 2011/2012 award year and received Federal Pell Grant funds of \$2,082 as a three-quarter time student. He should have received \$1,388 as a half time student. He was overpaid \$694 for fall term of the 2011/2012 award year.

Student 24: This student was enrolled in the certificate program, Christian Ministries, which is a program that is 30 credit hours and 32 weeks in length. The student could only receive one Federal Pell because the school's academic year is 24 credit hours and 30 weeks in length. For the 2012/2013 award year, she was enrolled as a half time student for fall semester and was paid \$1,388, for spring semester she was enrolled as a less than half time student and received \$1,387, but should have received \$694. The student received \$3,470 for the 2011/2012 award year and received \$2,775 for the 2012/2013 award year. The student was overpaid \$694 for 2012/2013 award year.

Student 28: This student was enrolled as a three-quarter time student for fall term of the 2012/2013 award year and received Federal Pell Grant funds of \$2,775 as a full time student. He should have received \$2,081 as three-quarter time student. He was overpaid \$694 for fall term of the 2012/2013 award year.

Student 30: He was paid \$2,775 as a full time student for fall semester 2012, but was enrolled three quarter time and should have received \$2,081. He was overpaid \$694 for the 2012/2013 award year.

The following Liabilities were determined:

Student	Award Year	Award Year	Program	Total 2011/2012	Total 2012/2013
3	2011/2012		Federal Pell	\$693	
5		2012/2013	Federal Pell		\$687
15	2011/2012		Federal Pell	\$687	
15		2012/2013	Federal Pell		\$687
16		2012/2013	Federal Pell		\$1,387
18	2011/2012		Federal Pell	\$350	
19	2011/2012		Federal Pell	\$694	
24		2012/2013	Federal Pell		\$694
28		2012/2013	Federal Pell		\$694
30		2012/2013	Federal Pell		\$694
				\$2,424	\$4,843

Final Determination:

WLBC must repay the department to amount of \$7,267 for the Federal Pell Grant overpayments disbursed to students for the 2011/2012 and 2012/2013 award years.

FINDING 2: UNTIMELY PAYMENT OF CREDIT BALANCES

Citations:

Pursuant to 34 C.F.R. § 668.164 and § 668.165, General Provisions regulations, Subpart K, whenever an Institution disburses Title IV, HEA program funds by crediting a student's account and the total amount of all Title IV, HEA program funds credited exceeds the amount of tuition and fees, room and board, and other authorized charges the Institution assessed the student, the Institution must pay the resulting credit balance directly to the student or parent (for Federal PLUS Loan) as soon as possible, but no later than 14 days after the balance occurred if the credit balance occurred after the first day of class of a payment period; or no later than 14 days after the first day of class of a payment period if the credit balance occurred on or before the first day of class of that payment period.

A school is permitted to hold excess funds (credit balances) if it obtains a voluntary authorization from the student or parent. If a school receives authorization to hold excess funds, the school must identify the student or parent and the amount of funds the school holds for the student or parent in a subsidiary ledger account designated for that purpose. A school may not require or coerce a student to provide authorization, and a school must allow for cancellation or modification of the authorization at any time. The school must maintain, at all times, cash in its bank account at least equal to the amount the school holds for students. Because Federal Student Aid (FSA) Program funds are awarded to students to pay current year charges, notwithstanding any authorization obtained by a school from a student or parent, the school must pay any remaining balance on loan funds by the end of the loan period, and any other remaining FSA program funds by the end of the last payment period in the award year from which it was created.

Area of Noncompliance:

A review of the individual student ledgers revealed that the Institution is not returning the Title IV credit balances to its students in a timely manner. The following examples are provided:

<u>Student</u>	<u>Balance Created</u>	<u>Balance Paid</u>
2	1/7/13	5/24/13
3	10/31/11	11/17/11
3	1/25/12	2/28/12
4	3/7/13	4/18/13
5	2/5/13	3/18/13
10	12/13/12	4/20/13
11	1/31/11	2/28/11
11	1/9/12	1/27/12
14	1/18/13	2/23/13
16	1/27/11	2/28/11
16	12/19/12	3/15/13
16	1/7/13	3/23/13
18	9/13/11	10/17/11
23	1/25/11	2/18/12
24	5/15/12	3/27/13

<u>Student</u>	<u>Balance Created</u>	<u>Unpaid</u>
7	4/20/13	\$3,644
11	1/18/13	\$4,863

Required Action:

The institution was required to review the accounts of all students who enrolled at the institution during 2010/2011 and 2011/2012 award years and identify any excess funds resulting from Title IV disbursements that were held on students' accounts after they had graduated or withdrew from school. The institution was to immediately disburse the excess funds to the students. For students who are no longer enrolled, the institution was to document its efforts to locate these individuals and disburse the credit balances.

A report detailing the results of the institution's review was to be submitted with the program review response.

The institution was required to also institute procedures to ensure that credits on students' accounts are identified and refunded in a timely manner. A description of the procedures developed was to be submitted with the institution's response to this finding.

WLBC's Response:

Upon completion of the file review it, was found that all students, including those who graduated and those withdrew, had received their Title IV disbursements prior to the end of the semester. WLBC was in compliance during the 2010/2011 and 2011/2012 award years.

The report states that student 7 has not received her balance of \$3,644. This is true and WLBC is making plans to reimburse the student in the near future. However, for student 11 the credit balance was issued on January 7, and 18, 2013.

A description of the procedures developed was submitted with the institution's response to this finding.

Final Determination:

WLBC must pay the credit balance of \$3,644 to student 7.

**FINDING 5: LATE RETURN OF TITLE IV FUNDS AND LACK OF
DOCUMENTATION TO SUPPORT THE RETURN OF FUNDS**

Citation:

Pursuant to 34 C.F.R. § 668.22, General Provisions regulations, schools are required and must return the unearned amount of Title IV funds for which it is responsible as soon as possible, but not later than 45 days after the date of the institution's determination that the student withdrew.

Area of Noncompliance:

Title IV funds were returned late to the Federal account for students 6 and not yet returned for 27.

<u>Student</u>	<u>Last date of Attendance</u>	<u>Date Refund Made</u>
6	9/12/11	1/10/12
27	12/15/12	Not yet returned

Required Action:

The institution must return the Title IV funds to the appropriate programs for student 27.

The institution was to provide assurances that all Title IV funds would be returned timely.

WLBC's Response:

The college agrees the Title IV funds for student 27 have not been returned.

Final Determination:

WLBC must return the amount of \$2,250 for Direct loan Unsubsidized and \$3,000 for Unsubsidized to the Direct Loan Program for student 27.

FINDING 6: FEDERAL DIRECT LOANS CERTIFIED AT THE INCORRECT GRADE LEVELS

Citation:

Pursuant to C.F.R. § 685.203 of the Federal Direct Loan program, the unsubsidized Stafford limits for independent students and dependent students whose parents can't get Parent Loan for Undergraduate Students (PLUS), there are higher additional unsubsidized annual loan limits for independent undergraduate students. These higher additional unsubsidized loan limits also apply to dependent undergraduate students whose parents are unable to borrow PLUS Loans due to adverse credit or other documented exceptional circumstances.

- \$3,500 combined subsidized and/or unsubsidized plus \$6,000 additional unsubsidized for independent first-year undergraduates;
- \$4,500 combined subsidized/and or unsubsidized plus \$6,000 additional unsubsidized for independent second-year undergraduates; and
- \$5,500 combined subsidized and/or unsubsidized plus \$7,000 additional unsubsidized for independent third-, fourth-, or fifth-year undergraduates.

Area of Noncompliance:

The following students were independent students and had Federal Direct Loans certified at the incorrect grade level:

Student 6: This student was enrolled at a grade level 1 but the Direct Stafford Subsidized was certified for fall and spring semesters at a grade level 2. The student received \$4,500 but should have received \$3,500.

Student 13: This student was enrolled at grade level 2 for the fall semester 2012/2013 and at a grade level 3 for the spring semester 2012/2013. The Direct Stafford Subsidized and Unsubsidized loans were certified for fall and spring semesters at a grade level 2. The student could have received a loan funds at a grade level 3 spring semester, which would have allowed her to obtain more loan funds.

Student 14: This student was enrolled in the Christian Ministries program, which has 30 credit hours and 32 weeks in length. He was only eligible for a Direct Stafford Subsidized loan for \$3,500 at grade level 1 and a Direct Stafford Unsubsidized loan for \$6,000. He was awarded a second Direct Stafford Subsidized loan for \$2,927 and a second Direct Stafford Unsubsidized loan for \$6,573 both at grade level 1. Due to the length of the program, the student was only eligible for one a Direct Stafford Subsidized and Unsubsidized loan at a grade level 1.

Student 27: This student was certified for the 2011/2012 award year for Direct Stafford Subsidized loan of \$2,196 and Direct Stafford Unsubsidized loan of \$8,304 at grade level 1 for a total of \$10,500. This student was over awarded at grade level 1. The maximum amount for a combined Subsidized and Unsubsidized loan is \$9,500 at a grade level 1.

Required Action:

For student 6, the institution must repay the \$1,000 overpaid to the student because the student had not reached grade level 2.

For student 14, the institution must repay the second Direct Stafford Subsidized loan for \$2,927 and the second Direct Stafford Unsubsidized loan for \$6,573 because the student was only eligible for one loan for that program.

WLBC's Response:

Student 6: The College concurs. The college is also making every effort to correct this matter by returning funds to the Department.

Student 13: The error was made due to third party servicing, but the College is making every effort to correct the mistakes.

Student 14: The initial acceptance and certification was approved by USDE. This program set up from the beginning to be completed with one year in traditional program and two years in non-traditional program.

Student 27: The third party servicer processed at grade level 1, which was the student's correct level.

Final Determination:

WLBC must repay to the Federal Direct Loan program \$3,927 for the Direct Stafford Subsidized loan and \$6,573 for the Direct Stafford Unsubsidized loan disbursed for the incorrect student grade levels for students 6, and 14.

D. Summary of Liabilities

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

Liabilities	Pell (Closed Award Year)	FSEOG Federal Share	DL / FFEL	EALF DL
Finding 1	\$7,267			
Finding 5			\$5,250	
Finding 6			\$10,500	
Subtotal 1	\$7,267		\$15,750	
Interest/SA	\$47		\$83	
Excess Cash				
ACA				
Subtotal 2	\$47		\$15,833	
TOTAL (add subtotal 1 + 2)	\$7,314		\$15,833	
Payable To:				Total
Department	\$7,314		\$15,833	\$23,147
Students			\$ 3,644	\$ 3,644
Lenders				
Inst Accounts				

E. Payment Instructions

WLBC owes to the Department \$23,147. Payment must be made by forwarding a check made payable to the "U.S. Department of Education" to the following address within 45 days of the date of this letter:

U.S. Department of Education
P.O. Box 979026
St. Louis, MO 63197-9000

Remit checks only. Do not send correspondence to this address.

Payment must be made via check and sent to the above Post Office Box. 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(s) and

The following identification data must be provided with the payment:

Amount: \$23,147
DUNS: 967907791
TIN: 582356831
Program Review Control Number: 201330428333

If within forty-five days of the date of this letter, your institution has neither made payment in accordance with these instructions nor entered into an arrangement to repay the liability under terms satisfactory to the U.S. Department of Education, the Department intends to collect the amount due and payable by administrative offset against payments due to your organization from the Federal Government. Your institution may object to the collections by offset only by challenging the existence or amount of the debt.

Your institution makes this challenge by timely appealing this determination under the procedures described in the "Appeal Procedures" section of this 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 Treasury for further action as authorized by the Debt Collection Improvement Act of 1996.

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. WLBC 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 WLBC 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 6114
Washington, DC 20202-4461

If within 45 days of the date of this letter, WLBC 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 WLBC from the Federal Government. **WLBC may object to the collection by offset only by challenging the existence or amount of the debt.** To challenge the debt, WLBC 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.

WLBC must make a good faith effort to pay the amount listed above to student 7 listed in the above Appendices.

If WLBC cannot locate a student, payment must be made to the account of the program from which the award was made. If that cannot be determined, the funds must be paid in the order required for the return of funds specified in 34 C.F.R. § 668.22(i):

Unsubsidized Federal Stafford loans
Subsidized Federal Stafford loans
Unsubsidized Federal Direct Stafford loans
Subsidized Federal Direct Stafford loans
Federal Perkins Loans
Federal PLUS loans received on behalf of the student
Federal Direct PLUS received on behalf of the student
Federal Pell Grants
Academic Competitiveness Grants
National SMART Grants
FSEOG Program aid
TEACH Grants

WLBC must provide proof of payment to the student by submitting a copy of the front and back of the canceled check to Lynette Davis within 45 days of the date of this letter.

In the event the student cannot be located, does not cash a check that has been mailed, and the institution is unable to initiate an EFT to the student's or parent's bank account, WLBC must return the funds to the appropriate Title IV program account via G5 and make the corresponding downward adjustments to the applicable disbursements in COD. WLBC must document its attempts to contact the student and provide proof of payment and COD adjustments to the applicable Title IV program to Lynette Davis. The Department will not consider this program review closed until the information requested has been received.

Liabilities Owed to Students

Finding(s): 2
 Appendix: A

Student(s)	
Amount	Award Year
\$3,644	2011/2012
Total	
\$3,644	

Findings: 5 and 6
 Appendices: D

WLBC must repay the following Direct Loan liabilities:

List each program by principal, interest, and award year on separate rows

DL Closed Award Year		
Amount (Principal)	Amount	Award Year
15,750	\$15,750	2011/2013
Total Principal	Total Interest	
15,705	\$83	

The disbursement record for each student identified in appendix D listed above must be adjusted in the Common Origination and Disbursement (COD) system based on the recalculated amount identified in the/these appendix/appendices. A copy of the adjustment to each student's COD record must be sent to Lynette Davis **within 45 days of the date of this letter.**

WLBC must repay to the Department for the ineligible non-loan funds (Title IV Federal Pell Grant (Pell Grant) disbursed for students identified in the program review sample and file review. The liabilities are reported in the table below. WLBC is also required to repay the cost of funds on the ineligible Pell Grants disbursed.

The Cost of Funds (COF) is the expense the Department incurred as a result of WLBC retaining the ineligible funds. The rate of interest is based on when the funds should have been returned to the Department. A copy of the COF calculation is included in Appendix D of this report

Type of Funds	Principle	Cost of Funds	Total
Pell Grant	\$7,267	\$47	\$7,314

WLBC must notify all students and/or borrowers in writing regarding payments made on their behalf. This notification must include the amount and date of the payments. Instructions for repayment of this liability are included in the Repayment section of this report.

Type of Funds	Liability
Pell Grant	\$7,267
Pell Cost of Funds	\$ 47
Liability for Disbursed Loans	\$15,833
Total Liability	\$23,147

Pell – Closed Award Year

Findings: 1
 Appendices: D

WLBC must repay:

Pell Closed Award Year				
Finding Number	Amount (Principal)	Amount (Interest)	Title IV Grant	Award Year
Finding 1	\$7,267	\$47	Pell Grant	2011-2013
	Total Principal	Total Interest		
	\$7,267	\$47		

The disbursement record for each student identified in Appendix A must be adjusted in the Common Origination and Disbursement (COD) system based on the recalculated amount.

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 Lynette Davis **within 45 days of the date of this letter.**

Appendix - D

Prepared for
W. L. Bonner C College

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

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OPE ID 03856400
PRCN 201330428333

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

Program Review Report

October 23, 2013

U.S. Department of Education
School Participation Team SC – Atlanta
61 Forsyth St. SW, Room 18T40, Atlanta GA 30303-3104

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A. Institutional Information

W. L. Bonner College
4430 Argent Court
Columbia, SC 29203

Type: Private, Nonprofit

Highest Level of Offering: Bachelor's Degree

Accrediting Agency: Accrediting Association of Bible Colleges

Current Student Enrollment: 2012/2013

% of Students Receiving Title IV: 95%

Title IV Participation	2011/2012
Federal Pell	\$ 75,749
William D. Ford Federal Direct Loan Program (Direct Loan)	\$227,732
Supplemental Education Opportunity Grant (SEOG)	\$ 3,900
Federal Work Study (FWS)	\$ 1,294

Default Rate FFEL/DL: 0

The Institution has not been in the program long enough to generate a default rate.

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at W. L. Bonner College, (WLBC) from June 3-7, 2013. The review was conducted by Ms. Lynette Davis, Mr. Oscar Howard and Mr. Lonnie Seals.

The focus of the review was to determine WLBC'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 WLBC'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 total of 31 files was identified for review from the 11/12 and 12/13 (year to date) award years. The total population receiving Title IV, HEA program funds for both award years was reviewed because there were only 31 students enrolled. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning WLBC'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 WLBC 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 WLBC to bring operations of the financial aid programs into compliance with the statutes and regulations.

FINDING 1: INCORRECT DISBURSEMENTS OF FEDERAL PELL GRANTS

Citation:

Pursuant to 34 C.F.R. § 690.63, of the Federal Pell Grant Program, an institution without fixed terms must first find the length of the payment periods before a student's Federal Pell Grant can be calculated. Once the payment period has been determined, the institution must multiply the student's Scheduled Award by the hours in the payment period, divided by the hours in the academic year. A student can receive only one Scheduled Award in an award year.

In a program with non-standard academic terms, the payment period does not end until the student has completed all of the work paid for in the first payment period. Each subsequent payment period begins only when the previous one ends. A student may not be paid a Federal Pell Grant for that subsequent payment period until the student has completed all of the clock or credit hours and number of weeks in the first payment period.

Area of Noncompliance:

The following students received incorrect disbursements of Federal Pell Grant funds:

Student 2: This student was paid as a full time student for spring semester. For the 2012/2013 award year, the student received \$2,775 from Federal Pell Grant. He should have been paid the amount of \$1,388 as a half time student. The student was over paid \$1,387 for award year 2012/2013.

Student 3: This student was enrolled as a three quarter time student for fall semester of the 2011/2012 award year and was paid \$2,775 as a full time student from Federal Pell Grant. He should have been paid \$2,082. He was over paid the amount of \$693 for award year 2011/2012.

Student 5: This student was paid as a three quarter time student for spring semester of the 2011/2012 award year and received \$1,725 from Federal Pell Grant. He should have been paid the amount of \$1,150 as a half time student. The student was over paid \$575 for the 2011/2012 award year. Also, for spring semester 2012/2013 the student was paid based on full time enrollment, but should have been paid based on three quarter time enrollment. He received \$2,750 but should have received \$2,063. He was overpaid \$687 for the 2012/2013 award year. He was overpaid a total of \$1,262 for both award years.

Student 15: This student was enrolled as a three-quarter time student fall semester 2011/2012. He should have received \$2,063 for fall from Federal Pell Grant. He was paid \$2,750 as a full time student. He was over paid \$687 for the 2011/2012 award year. For the 2012/2013 award year, he was enrolled in 4 hours for fall semester, but was paid as a half-time student. He was paid Federal Pell Grant funds of \$1,375 but should have been paid \$688 as a less than half time student. He was over paid \$687 for the 2012/2013 award year. The total over payment for both award years was \$1,374.

Student 16: This student was paid as a full time student for spring semester 2012/2013 and received \$2,775 from Federal Pell Grant. He should have been paid the amount of \$1,388 as a half time student. The student was over paid \$1,387 for the 2012/2013 award year.

Student 17: This student was paid as a half-time student for the fall semester 2012/2013 award year and received the amount of \$1,388 from Federal Pell Grant. He should have been paid the amount of \$694 as a less than half time student. The student was over paid the amount of \$694 for the 2012/2013 award year.

Student 18: This student was paid the amount of \$1,400 from Federal Pell Grant as a full time student for fall semester 2011/2012 and was enrolled as a three quarter time student for fall semester 2011. She should have been paid the amount of \$1,050. She was over paid the amount of \$350 for the 2011/2012 award year.

Student 19: This student was enrolled as a half-time student for fall semester of the 2011/2012 award year and received Federal Pell Grant funds of \$2,082 as a three-quarter time student. He should have received \$1,388 as a half time student. He was over paid \$694 for fall term of the 2011/2012 award year.

Student 24: This student was enrolled in the certificate program, Christian Ministries, which is 30 credit hours and 32 weeks in length program. The student could only receive one Federal Pell because the school's academic year is 24 credit hours and 30 weeks in length. For the 2012/2013 award year, she was enrolled as a half time student for fall semester and was paid \$1,388, for spring semester she was enrolled as a less than half time student and received \$1,387 but should have received \$694. The student was over paid the amount of \$693 for 2012/2013 award year.

Student 28: This student was enrolled as a three-quarter time student for fall term of the 2012/2013 award year and received Federal Pell Grant funds of \$2,775 as a full time student. He should have received \$2,081 as three-quarter time student. He was over paid \$694 for fall term of the 2012/2013 award year.

Student 30: This student was disbursed \$2,775 from Federal Pell Grant as a full time student for the fall semester 2011/2012 award year but should have been disbursed \$2,081 as a three quarter time student. He was overpaid \$694 for the 2011/2012 award year. He was paid \$2,775 as a full time student for fall semester 2012, but was enrolled three quarter time and should have received \$2,081. For spring semester he was paid \$2,775 as a full time student but should have been paid \$1,388 as a half time student. He was over paid the amount of \$2,081 for the 2012/2013 award year. The total overpayment for both award years was \$2,775.

The following student was under paid Federal Grant funds:

Student 6: For the 2011/2012 award year, this student was disbursed \$900 from Federal Pell Grant as a half-time student for fall term but should have been disbursed \$925. He was also disbursed \$900 as a three-quarter time student for spring term, but should have been disbursed \$1,387. He was under paid \$25 for fall term and \$487 for spring term. He received 2,250 but should have received \$2,312. The student was under paid the amount of \$62.

Student 26: This student was disbursed \$1,095 for Federal Pell Grant for the 2012/2013 award year but should have been disbursed \$4,195 as a three-quarter time student for the 2012/2013 award year. The student was under paid the amount of \$3,100.

Required Action:

For student 26, the institution had until September 30, 2013 to make the adjustment and pay the student the correct disbursement. Also, for any other student under paid for the 2012/2013 award year the institution had until that date to make adjustments. The Financial Aid Director was advised of this required action to make the adjustments before the deadline of September 30, 2013.

The program review team reviewed all students enrolled for the 2011/2012 and 2012/2013 award years. In addition to the above students, the institution must recalculate Federal Pell Grant awards for all students enrolled after the program review to determine the extent of any further over awards or under awards which occurred due to the institution's improper calculations.

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

1. Student's Name and Social Security Number
2. Award Year
3. Federal Pell Grant Disbursed
4. Recalculated Federal Pell Grant
5. Overaward

If WLBC submits the data electronically, the institution must place the files in a password protected WINZIP archive. This will compress the data in addition to providing password protection. The institution must telephone Lynette Davis with the password at (404) 974-9289. If the documentation is mailed, the institution must only submit the last 4 numbers of the student's social security number.

Further, the institution must develop and submit with its response, procedures which will ensure that, in the future, the Federal Pell Grant funds will be accurately calculated and consistently applied to all students.

Repayment instructions for any determined liability will be provided in the Final Program Review Determination letter.

FINDING 2: UNTIMELY PAYMENT OF CREDIT BALANCES

Citations:

Pursuant to 34 C.F.R. § 668.164 and § 668.165, General Provisions regulations, Subpart K, whenever an Institution disburses Title IV, HEA program funds by crediting a student's account and the total amount of all Title IV, HEA program funds credited exceeds the amount of tuition and fees, room and board, and other authorized charges the Institution assessed the student, the Institution must pay the resulting credit balance directly to the student or parent (for Federal PLUS Loan) as soon as possible, but no later than 14 days after the balance occurred if the credit

balance occurred after the first day of class of a payment period; or no later than 14 days after the first day of class of a payment period if the credit balance occurred on or before the first day of class of that payment period.

A school is permitted to hold excess funds (credit balances) if it obtains a voluntary authorization from the student or parent. If a school receives authorization to hold excess funds, the school must identify the student or parent and the amount of funds the school holds for the student or parent in a subsidiary ledger account designated for that purpose. A school may not require or coerce a student to provide authorization, and a school must allow for cancellation or modification of the authorization at any time. The school must maintain, at all times, cash in its bank account at least equal to the amount the school holds for students. Because Federal Student Aid (FSA) Program funds are awarded to students to pay current year charges, notwithstanding any authorization obtained by a school from a student or parent, the school must pay any remaining balance on loan funds by the end of the loan period, and any other remaining FSA program funds by the end of the last payment period in the award year from which it was created.

Area of Noncompliance:

A review of the individual student ledgers revealed that the Institution is not returning the Title IV credit balances to its students in a timely manner. The following examples are provided:

<u>Student</u>	<u>Balance Created</u>	<u>Balance Paid</u>
2	1/7/13	5/24/13
3	10/31/11	11/17/11
3	1/25/12	2/28/12
4	3/7/13	4/18/13
5	2/5/13	3/18/13
10	12/13/12	4/20/13
11	1/31/11	2/28/11
11	1/9/12	1/27/12
14	1/18/13	2/23/13
16	1/27/11	2/28/11
16	12/19/12	3/15/13
16	1/7/13	3/23/13
18	9/13/11	10/17/11
23	1/25/11	2/18/12
24	5/15/12	3/27/13
30	11/30/12	1/10/13

For the following students had credit balances but were not paid to the student:

<u>Student</u>	<u>Balance Created</u>	<u>Amount</u>
7	4/20/13	\$3,644.
11	1/18/13	\$4,863

Required Action:

The institution must review the accounts of all students who enrolled at the institution in the 2010/2011 and 2011/2012 award years to identify any excess funds resulting from Title IV disbursements that were held on students' accounts after they had graduated or withdrew from school. The institution must immediately disburse the excess funds to the students. For students who are no longer enrolled, the institution must document its efforts to locate these individuals and disburse the credit balances. Certified mail receipts will be considered adequate documentation. Copies of these receipts must be forwarded to this office. Funds, which cannot be returned to students, must be repaid to the Department. This office will provide instructions for the disposition of funds if a student(s) does not negotiate the disbursement check. Also, in response to this finding, the institution must provide a report, which identifies all late disbursements of excess funds to students in the following format:

1. Student's Name
2. Social Security Number
3. Amount of Disbursement and Title IV program which Caused the Excess Funds
4. Amount of Credit Balance caused by the Disbursement
5. Date Disbursement Sent to Student, if any

A report detailing the results of the institution's review must be submitted in the following format via diskette and/or can be submitted electronically. If WLBC submits the data electronically, the institution must place the files in a password protected WINZIP archive. This will compress the data in addition to providing password protection. The institution must telephone Lynette Davis with the password at (404) 974-9289. If the documentation is mailed, the institution must only submit the last four numbers of the student's social security number.

The institution must provide a cumulative total of all funds that cannot be disbursed to students by program and award year.

The institution must also institute procedures to ensure that credits on students' accounts are identified and refunded in a timely manner. A description of the procedures developed must be submitted with the institution's response to this finding.

Payment instructions for funds that cannot be disbursed, if any, will be provided in the Final Program Review Determination letter.

FINDING 3: ACCOUNTING RECORDS NOT RECONCILED AND UNCLEAR AUDIT TRAIL

Citation:

Pursuant to 34 C.F.R. § 668.164, of the General Provisions regulations, under Standard of Conduct, an institution must exercise the level of care and diligence required of fiduciary with regard to maintaining and investing Title IV, HEA program funds. An institution is also required to disburse funds to students by check or by crediting the student's account. An institution as a trustee of federal funds, may not use or hypothecate federal funds for any purpose other than the intended student beneficiary.

Pursuant to 34 C.F.R. § 668.162 of the General Provisions regulations, under the cash monitoring payment method, the Secretary provides title IV, HEA program funds to an institution under the provisions described in paragraph (e)(1) or (e)(2) of this section. Under either paragraph (e)(1) or (e)(2) of this section, an institution must first make disbursements to students and parents for the amount of title IV, HEA program funds that those students and parents are eligible to receive.

Further, an institution must maintain funds received under the requirements in the Program regulations which require institutions to maintain, on a current basis, financial records which reflect all program transactions. Accepted accounting procedures dictate that those transactions be reconciled. Therefore, the institution must reconcile its financial aid records to its general ledgers on a timely basis.

Area of Noncompliance:

The financial aid, fiscal office and third-party servicer did not have a system to regularly reconcile student financial aid awards and disbursements. The institution is under the Cash Monitoring Payment Method -1. The review of several bank account statements showed that staff payroll was taken directly from the Federal funds bank account without establishing a clear audit trail for payments first to students for those funds.

Also, an amount of \$125 was listed on the 2011-2012 Fiscal Operation Report and Application to Participate (FISAP) for SEOG funds carried forward from the 2010-2011 award year to be spent in the 2011-2012 award year. Further, FWS funds of \$679 were carried forward from the 2010-2011 award year to be spent in the 2011-2012 award year. According to the school's Financial Officer, the amount carried from the 2010-2011 award year was not documented in the school's general ledger. An explanation for the lack of documentation was not provided. When asked for documentation to show that the funds carried forward were spent in the 2011-2012 award year, this documentation was not available.

Required Action:

Program regulations require institutions to maintain, on a current basis, financial records which reflect all program transactions. Accepted accounting procedures dictate that those transactions be reconciled. Therefore, the institution must reconcile its financial aid records to its general ledgers for the 2011-2012 and 2012-2013 award years and submit a copy of that reconciliation with all reconciling items to this office, which includes the carry forward expenditures and copies of the general and subsidiary ledgers on which it is documented.

The institution must provide an explanation for the Title IV funds first paid to staff and not to students. The institution must also provide documentation that all funds paid to staff was paid to the students accounts for which they were requested.

Further, the institution must develop policies and procedures to accomplish the foregoing on at least a monthly basis. A copy of these procedures must be included in the response to this report.

FINDING 4: UNTIMELY FEDERAL DL LOAN ENTRANCE AND EXIT COUNSELING

Citation:

Pursuant to C. F.R. § 685.304 of the Federal Direct Loan regulations, for entrance counseling,
(1) Except as provided in paragraph (a) (5) of this section, a school must conduct initial counseling prior to making the first disbursement of the proceeds of a Direct Subsidized or Direct Unsubsidized Loan to a borrower unless the student borrower has received a prior Direct Subsidized, Direct Unsubsidized, Federal Stafford, Federal Unsubsidized Stafford, or Federal SLS Loan.

(2) The counseling must be in person, by audiovisual presentation, or by interactive electronic means. In each case, the school must ensure that an individual with knowledge of the title IV programs is reasonably available shortly after the counseling to answer the student borrower's questions. As an alternative, in the case of a student borrower enrolled in a correspondence program or a study-abroad program approved for credit at the home institution, the school may provide the student borrower with written counseling materials prior to disbursing the loan proceeds.

(3) In conducting the initial counseling, the school must--

(i) Explain the use of a Master Promissory Note;

(ii) Emphasize to the borrower the seriousness and importance of the repayment obligation the student borrower is assuming;

(iii) Describe in forceful terms the likely consequences of default, including adverse credit

reports, garnishment of wages, and litigation;

(iv) Provide the student borrower with general information with respect to the average indebtedness of student borrowers who have obtained Direct Subsidized or Direct Unsubsidized Loans for attendance at that school or in the student borrower's program of study;

(v) Inform the student borrower as to the average anticipated monthly repayment for those student borrowers based on the average indebtedness provided under paragraph (a)(3)(iv) of this section.

(4) Additional matters that the Secretary recommends that a school include in the initial counseling session or materials are set forth in Appendix D to 34 CFR Part 668.

(5) A school may adopt an alternative approach for initial counseling as part of the school's quality assurance plan described in Sec. 685.300(b) (9). If a school adopts an alternative approach, it is not required to meet the requirements of paragraphs (a) (1)-(3) of this section unless the Secretary determines that the alternative approach is not adequate for the school. The alternative approach must--

(i) Ensure that each student borrower subject to initial counseling under paragraph (a)(1) of this section is provided written counseling materials that contain the information described in paragraph (a)(3) of this section;

(ii) Be designed to target those student borrowers who are most likely to default on their repayment obligations and provide them more intensive counseling and support services; and

(iii) Include performance measures that demonstrate the effectiveness of the school's alternative approach. These performance measures must include objective outcomes, such as levels of borrowing, default rates, and withdrawal rates.

(6) A school that conducts initial counseling through interactive electronic means must take reasonable steps to ensure that each student borrower receives the counseling materials, and participates in and completes initial counseling.

(7) The school must maintain documentation substantiating the school's compliance with this section for each student borrower.

(b) **Exit counseling.** (1) A school must conduct exit counseling with each Direct Subsidized or Direct Unsubsidized Loan borrower shortly before the student borrower ceases at least half-time study at the school.

(2) The counseling must be in person, by audiovisual presentation, or by interactive electronic means. In each case, the school must ensure that an individual with knowledge of the title IV programs is reasonably available shortly after the counseling to answer the student borrower's

questions. As an alternative, in the case of a student borrower enrolled in a correspondence program or a study-abroad program approved for credit at the home institution, the school may provide the student borrower with written counseling materials within 30 days after the student borrower completes the program.

(3) If a student borrower withdraws from school without the school's prior knowledge or fails to complete the exit counseling as required, the school must provide exit counseling either through interactive electronic means or by mailing written counseling materials to the student borrower at the student borrower's last known address within 30 days after the school learns that the student borrower has withdrawn from school or failed to complete the exit counseling as required.

(4) In conducting the exit counseling, the school must--

(i) Inform the student borrower of the average anticipated monthly repayment amount based on the student borrower's indebtedness or on the average indebtedness of student borrowers who have obtained Direct Subsidized or Direct Unsubsidized Loans for attendance at that school or in the student borrower's program of study;

(ii) Review for the student borrower available repayment options including the standard repayment, extended repayment, graduated repayment, and income contingent repayment plans, and loan consolidation;

(iii) Provide options to the student borrower concerning those debt-management strategies that the school determines would facilitate repayment by the student borrower;

(iv) Explain to the student borrower how to contact the party servicing the student borrower's Direct Loans.

Area of Noncompliance:

Students 2, 5, 10, 11, 16, 23 and 24, had missing entrance counseling.

For students 1, 2, 8, 16, 23 and 27, the institution did not have proper documentation to support exit loan counseling provided within 30 days after the borrower withdrew.

Required Action:

In response to this finding, the institution must perform a file review of all students who withdrew/graduated from the school for the 2011-2012 and 2012-2013 award years and did not attend an entrance and/or exit interview and there was no e-mail sent to the school indicating the student had completed entrance and/or exit counseling. For these students the institution must mail counseling information to the borrower. A report detailing the results of the institution's review must be submitted in the following format:

1. Student's Name
2. Social Security Number

3. Program of Study
4. Date Student Withdrew/Graduated
5. Date Entrance and Exit Information mailed

If WLBC submits the data electronically, the institution must place the files in a password protected WINZIP archive. This will compress the data in addition to providing password protection. The institution must telephone me with the password at (404) 562-6293. If the documentation is mailed, the institution must only submit the last four numbers of the student's social security number.

The institution must develop procedures to provide entrance and exit counseling to students in a timely manner. Please provide a copy of those procedures with the response to this report. The institution must also provide its assurances that entrance and exit loan counseling will be performed in a timely manner for all Direct Loan borrowers.

FINDING 5: LATE RETURN OF TITLE IV FUNDS AND LACK OF DOCUMENTATION TO SUPPORT THE RETURN OF FUNDS

Citation:

Pursuant to 34 C.F.R. § 668.22, General Provisions regulations, schools are required and must return the unearned amount of Title IV funds for which it is responsible as soon as possible, but not later than 45 days after the date of the institution's determination that the student withdrew.

Area of Noncompliance:

Title IV funds were returned late to the Federal account for students 6 and not yet returned for 27.

<u>Student</u>	<u>Last date of Attendance</u>	<u>Date Refund Made</u>
6	9/12/11	1/10/11
27	12/15/12	Not yet returned

Required Action:

The institution must return the Title IV funds to the appropriate programs for student 27. The documentation must include the following:

1. Date of the Refund Calculation
2. Date Returned
3. The Amount
4. Program funds returned.

The institution must provide assurances that all Title IV funds will be returned timely.

Upon receipt of the institution's response to this finding, further action may be required.

FINDING 6: FEDERAL DIRECT LOANS CERTIFIED AT THE INCORRECT GRADE LEVELS

Citation:

Pursuant to C.F.R. § 685.203 of the Federal Direct Loan program, the unsubsidized Stafford limits for independent students and dependent students whose parents can't get PLUS, there are higher additional unsubsidized annual loan limits for independent undergraduate students. These higher additional unsubsidized loan limits also apply to dependent undergraduate students whose parents are unable to borrow PLUS Loans due to adverse credit or other documented exceptional circumstances.

- \$3,500 combined subsidized and/or unsubsidized plus \$6,000 additional unsubsidized for independent first-year undergraduates;
- \$4,500 combined subsidized/and or unsubsidized plus \$6,000 additional unsubsidized for independent second-year undergraduates; and
- \$5,500 combined subsidized and/or unsubsidized plus \$7,000 additional unsubsidized for independent third-, fourth-, or fifth-year undergraduates.

Area of Non Compliance:

The following students were independent students and had Federal Direct Loans certified at the incorrect grade level:

Student 6: This student was enrolled at a grade level one but the Direct Stafford Subsidized was certified for fall and spring semesters at a grade level 2. The student received \$4,500 but should have received \$3,500.

Student 13: This student was enrolled at grade level 2 for the fall semester 2012/2013 and at a grade level 3 for the spring semester 2012/2013. The Direct Stafford Subsidized and Unsubsidized loans were certified for fall and spring semesters at a grade level 2. The student could have received a loan funds at a grade level 3 spring semester, which would have allowed her to obtain more loan funds.

Student 14: This student was enrolled in the Christian Ministries program, which has 30 credit hours and 32 weeks in length. He was only eligible for a Direct Stafford Subsidized loan for \$3,500 at grade level one and a Direct Stafford Unsubsidized loan for \$6,000. He was awarded a second Direct Stafford Subsidized loan for \$2,927 and a second Direct Stafford Unsubsidized

loan for \$6,573 both at grade level one. Due to the length of the program, the student was only eligible for one a Direct Stafford Subsidized and Unsubsidized loan at a grade level one.

Student 27: This student was certified for the 2011/2012 award year for Direct Stafford Subsidized loan of \$2,196 and Direct Stafford Unsubsidized loan of \$8,304 at grade level one for a total of \$10,500. This student was over awarded at grade level one. The maximum amount for a combined Subsidized and Unsubsidized loan is \$9,500 at a grade level one.

Required Action:

For student 6, the institution must repay the \$1,000 over paid to the student because the student had not reached grade level 2.

For student 14, the institution must repay the second Direct Stafford Subsidized loan for \$2,927 and the second Direct Stafford Unsubsidized loan for \$6,573 because the student was only eligible for one loan for that program. For student 27 the institution must repay the \$1,000 over paid for grade level one.

Instructions for repayment will be issued in the Final Program Review Determination letter.

FINDING 7: ENROLLMENT STATUS NOT VERIFIED BEFORE DISBURSEMENT

Citation:

Pursuant to 34 C.F.R. § 685.200, of the Federal Direct Loan program, a student is eligible to receive a Direct Subsidized Loan, Direct unsubsidized Loan or a combination of these loans, if the student is enrolled , or accepted for enrollment on at least a half-time basis in a school that participates in the Direct Loan program.

Area of Noncompliance

Student 17 was enrolled less than half time fall semester for the 2012/2013 award year. The institution disbursed Federal Direct Subsidized Loan funds of \$867 and Federal Direct Unsubsidized Loan funds of \$1,365 to student 17 without verifying his/her enrollment status.

Student 19 was enrolled less than half time spring semester for the 2012/2013 award year. The institution disbursed Federal Direct Subsidized Loan funds of \$1,733 and Federal Direct Unsubsidized Loan funds of \$2,767 to student 19 without verifying his/her enrollment status.

Student 22 was less than half time for the fall semester 2012/2013 and received Federal Direct Subsidized Loan funds of \$3,500 and Federal Direct Unsubsidized Loan funds of \$2,750. The funds were disbursed 10/11/12 but not returned until 3/8/13.

Required Action:

The institution will be liable for the funds disbursed to students 17 and 19 because he was less than half time for spring semester 2012/2013.

In response to this finding, the institution must develop written procedures that describe how it will prevent improper disbursements to students based on changes in their enrollment status. A copy of these procedures must be submitted to this office. The institution must also explain why the students listed in this finding were given disbursements based on the incorrect enrollment status.

Instructions for repayment will be issued in the Final Program Review Determination letter.

FINDING 8: LACK OF DOCUMENTATION TO SUPPORT MONITORING OF SATISFACTORY ACADEMIC PROGRESS (SAP)

Citation:

Pursuant to 34 C.F.R. § 668.32, of the General Provisions regulations, a student must maintain satisfactory progress in his or her course of study according to the institution's published standards of satisfactory academic progress that satisfy the provisions of Section 668.16(e), and is applicable. Federal regulations require an institution to consistently apply its SAP standards to all students within categories of students (i.e., full-time, part-time, undergraduate and graduate students, and educational programs established by the institution). The school must determine, prior to disbursing Title IV funds, if a student is meeting satisfactory progress standards.

Area of Noncompliance:

Student 4: This student's term GPA for 2010/2011 for fall term was 1.28 and the spring term GPA was 1.20. The student was not placed on probation at the end of fall 2010/2011. The GPA was 0.42 for fall semester and for spring semester the term GPA was 0.75 for 2011/2012. There was no documentation that SAP had been checked for the 2011/2012 award year at the end of each semester. The SAP policy indicated that SAP is checked at the end of each term.

Required Action:

The institution must check the SAP for student 4. If the student was not making SAP and no documentation can be provided for checking SAP, the institution must return all funds disbursed. If the institution can provide documentation, please provide the documentation in response to this report. If necessary, any payment instructions will be provided in the Final Determination letter.

FINDING 9: MISSING DOCUMENTATION OF HIGH SCHOOL DIPLOMA

Citation:

34 C.F.R. § 668.32, Student Assistance General Provisions advises a student is eligible to receive Title IV funds if the student is a regularly enrolled student or one who is accepted for enrollment in an eligible program at an eligible institution. Among other criteria, the student must have a high school diploma or its recognized equivalent or have a passing score on a specified, Department approved, independently administered test in accordance with subpart J of Section 668.32.

The Department recognizes several equivalents to a high school diploma:

1. A General Equivalency Diploma (GED);
2. A certificate demonstrating that the student has passed a state-authorized examination that the state recognizes as the equivalent of a high school diploma;
3. An academic transcript of a student who has successfully completed at least a two-year program that is acceptable for full credit toward a bachelor's degree; or
4. For a student who enrolls before completing high school, a high school transcript indicating the student has excelled in high school. The student must no longer be enrolled in high school; must satisfy your school's written policy for admitting such students, and must be starting a program that leads at least to an associate's degree or its equivalent.

The 2010/2011 Federal Student Aid Handbook, Volume 1, Pages 1-7, in the sidebar notation of "What's a valid high school diploma", states with the appearance of high school "diploma mills", the school should contact the department of education for the state in which the high school is located to determine if the high school diploma is recognized by that state.

The student may also complete a GED or be home schooled under the applicable state law. 34 C.F.R. § 600.5 states that a proprietary institution of higher education that admits as regular students only persons who have a high school diploma; have a recognized equivalent of a high school diploma or are beyond the age of compulsory school attendance in the state in which the institution is physically located.

Area of Noncompliance:

For students 3, 4 and 26, the institution did not provide documentation that these students had received a high school diploma, its equivalency or had demonstrated other activities in lieu of a high school diploma to be eligible for Title IV.

Required Action:

In response to this report the institution must obtain the high school diploma for students 3, 4 and 26 or provide documentation that the students had demonstrated other activities in lieu of a high school diploma. Further, the institution must develop and submit with its response, procedures which will ensure that, in the future, the admissions requirements will be consistently applied to all students. Also, only diplomas from valid high schools will be accepted to be Title IV eligible.

FINDING 10: INCOMPLETE VERIFICATION

Citation:

Pursuant to 34 C.F.R. § 668.16 [f], 668.51 through § 668.61, of the General Provisions regulations, and the (U. S. Department of Education's Application and Verification Guide.) an institution is responsible for verifying the information that is used to calculate an applicant's Expected Family Contribution (EFC) as part of the determination of need for student financial assistance. Information is verified by securing additional documentation or, in some cases, a signed statement attesting to the accuracy of the information provided. The regulations also require an institution to verify discrepancies in information received from different sources regarding a student's application for financial aid under the Title IV programs.

Area of Noncompliance:

Student 6: This student was selected for verification for the 201/2012 award year. The adjusted gross income (AGI) for this student listed on 2010 tax form was \$21,572. The AGI listed on the 2011/2012 ISIR was \$25,000. The U. S. income tax paid was 0 on the tax form but \$1,500 on the ISIR.

Required Action:

The institution must recalculate the EFC for student 6. If the student's EFC, scheduled award and expected disbursement change as a result of recalculation, the institution must provide the results with the response to this report.

If there is a change to the student's EFC, the institution will be liable for any over award disbursed for the 2011-2012 award year.

Further, the institution must develop and submit with its response, policies and procedures which will ensure that, in the future conflicting information will be resolved and consistently applied to all students.

Repayment instructions if any will be provided in the Program Review Final Determination letter.

FINDING 11: CONFLICTING INFORMATION

Citation:

Pursuant to 34 C.F.R. § 668.56, an institution is responsible for validating the information that is used to calculate an applicant's Expected Family Contribution (EFC) as part of the determination of need for student financial assistance. Information is verified by securing additional documentation or, in some cases, a signed statement attesting to the accuracy of the information provided.

Area of Noncompliance:

Student 12: This student did not list the veteran's non-education benefits as nontaxable income on the Free Application for Federal Student Aid (FASFA) for the 2011-2012 and 2012-2013 award years. According to the outside aid received, the student received \$4,049 for 2011-2012, and \$4,434 for the 2012-2013 award years. This untaxed income should have been added as income and not listed as an educational resource.

Required Action:

The institution must resolve the conflicting discrepancies above. If the student's EFC, scheduled award and expected disbursement change as a result of recalculation, the institution must provide the results with the response to this report.

If there is a change to the student's EFC, the institution will be liable for any over award disbursed for the 2011-2012 and 2012-2013 award years.

Further, the institution must develop and submit with its response, policies and procedures which will ensure that, in the future conflicting information will be resolved and consistently applied to all students.

Repayment instructions if any will be provided in the Program Review Final Determination letter.

FINDING 12: IMPROPER DISBURSEMENT-WITHOUT VALID ISIR

Citation:

Pursuant to 34 C.F.R. § 690.61, an institution must disburse a Federal Pell Grant to an eligible student who is otherwise qualified to receive that disbursement and electronically transmit Federal Pell Grant disbursement data to the Secretary for that student if (i) The student submits a valid Student Aid Report (SAR) to the institution; or (ii) The institution obtains a valid Institutional Student Information Record (ISIR) or Student Aid Report (SAR). Although requested, this document was not submitted for the student.

Area of Noncompliance:

An examination of records revealed that student 15 was disbursed Federal Pell Grants for the 2011/2012 award year without a valid Institutional Student Information Record (ISIR) or Student Aid Report (SAR). Although requested, this document was not submitted by the school during the week of the program review.

Required Action:

The institution must submit a copy of a valid 2011/2012 SAR/ISIR for the above-referenced student.

In the event the institution cannot locate a valid SAR/ISIR, the institution will be liable for the Federal Pell Grant funds disbursed for the 2011/2012 award year. The institution must provide assurances that all students who received Federal Pell Grant funds will have a valid SAR/ISIR on file.

FINDING 13: MISSING OR INCOMPLETE ADMISSION FILE

Citation:

Federal Regulations 34 C.F.R. § 668.32 states, students who do not meet admissions criteria established by an institution should not be accepted for enrollment at that institution. A student is only eligible to receive Title IV assistance if the student is a regular student enrolled or accepted for enrollment in an eligible program. For each Title IV recipient, the institution must maintain, on a current basis, records regarding the student's admission to and enrollment status at the institution.

Area of Noncompliance:

During the week of the program review the admission's file for student 26 could not be located. A Student's admission file includes application for admission, high diploma or transcripts, college transcripts, etc.

Required Action:

The institution must provide a photo copy for the admissions file for student 26 in response to this report. If the file cannot be located all Title IV funds will become a liability.

The institution is reminded that it must become more diligent in its efforts to ensure that all required data needed to determine a student's Title IV eligibility are maintained and easily accessible.

FINDING 14: COMMON ORIGATION AND DISBURSEMENT (COD) REPORTING DISCREPANCIES

Citation:

34 C.F.R. § 690.83 requires institutions to submit a student's payment data (including disbursement dates) to the Secretary by the reporting deadlines published in the Federal Register. Institutions are required to submit FDL and Pell Grant disbursement records to COD no later than 30 days after making a disbursement or becoming aware of the need to adjust a student's previously reported disbursement (COD Technical Reference, 2008-2009, Volume II). The disbursement date is the date that the institution:

- a. Credits funds to a student's account, or;
- b. Pays funds to a student directly.

Refer to Federal Register, February 28, 2013 for the most recent reporting deadlines and requirements.

Area of Noncompliance:

For students 15 and 19 the COD records were not updated timely. The COD records still had pending under disbursements status, although the funds had been disbursed.

Required Action:

The institution must review its reporting procedures to determine why disbursement dates are accurate for some students and not others. Also why some files are updated timely and others are not. You must correct your procedures so that disbursement dates reported to COD are the dates that FDL and/or Pell funds are credited to the student's account or paid to the student directly. Please note that interest costs incurred by students begin to accrue on the date the loan is disbursed.

FINDING 15: 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. The following information must be disseminated:

- Pursuant to [HEOA Sec. 111 amended HEA Title 1, Part C: added HEA Sec. 132(a), Sec. 132(h) (20 U.S.C. 1015 a(a), 20 U.S.C. 1015a(h))], by October 29, 2011, schools must have a Net-Price Calculator on the institution's website using the Department's template or a customized version that includes at a minimum the same elements as the Department's version, http://nces.ed.gov/ipeds/resource/net_price_calculator.asp.

- 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.
- A Refund policy with which the institution is required to comply for return of unearned tuition and fees or other refundable portions of costs paid to the institution under C.F.R. § 668.43(a)(2).
- To students selected for verification, a written statement explaining:
 - documents required for verification
 - student's responsibilities (correction procedures, deadlines, consequences of missing deadlines)
 - notification (how school will notify student of award changes based on verification and the timeframe for the notification) under 34 C.F.R. § 668.53.
- Disclosures of the following information under the Student Right-to-Know Act: Completion or graduation rates and, if applicable, transfer-out rates for a specific cohort of the general student body, disclosed by July 1 of each year and disseminated to enrolled and prospective students upon request under 34 C. F. R. § 668.45.
Disaggregated by [HEOA Sec. 488(a)(3)]:
 - gender
 - major racial and ethnic subgroup
 - recipients of a Federal Pell Grant
- Under 34 C. F. R. § 668.41- 48, schools must also provide a notice (though not an individual notice) of student rights under the Family Educational Rights and Privacy Act (FERPA).

Information on diversity of the student body, including percentage of enrolled, full-time students who are male, female, self-identified members of a major racial or ethnic group, and Federal Pell Grant recipients [HEOA Sec. 488(a)(1)(E) amended HEA Sec. 485(a)(1)].

Noncompliance:

The institution failed to comply with the followings consumer information requirements:

- Net price calculator
- Constitution and Citizenship Day
- Return to Title IV Policy
- Verification Policy

- Completion/graduation rates
- Student Body Diversity

Required Action:

The institution 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. For detailed information on the consumer information requirements I suggest you refer to the 2010-2011 Federal Student Aid Handbook, Volume 2, Chapter 6, page 2-95. The institution's response must also provide a description of the steps that will be taken to prevent a repeat finding in the future.

D. Recommendations

The following is a recommendation based upon observations made by the review team during the program review. WLBC is not required to provide a response to, nor is WLBC required to act upon, these recommendations. However, the review team believes that adoption of this recommendation will assist the institution in its administration of Title IV, HEA program funds.

It is recommended, that the institution collect income data from students to address living expenses when students report zero income on the Free Application for Federal Student Aid (FAFSA).

It is also recommended, that the Financial Aid Director and the School Director attend Fundamentals of Title IV Training if they return to Title IV programs.

