



February 7, 2014

Dr. William Johnson  
President  
Wesley College  
120 North State Street  
Dover, DE 19901-3875

UPS Tracking Number  
1ZA879640291040493

RE: **Final Program Review Determination**  
OPE ID: 00143300  
PRCN: 201320328198

Dear Dr. Johnson:

The U.S. Department of Education's (Department's) School Participation Team - Philadelphia issued a program review report on July 1, 2013. Covering Wesley College's 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. Wesley College's response was received on August 30, 2013. A copy of the program review report (and related attachments) and the institution's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by Wesley College upon request. The Department has made final determinations based on information obtained during the program review and from documentation already submitted by Wesley College. 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 \$ 16, 871.32.

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

**Federal Student**

AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION  
School Participation Division - Philadelphia

U.S. Department of Education

100 Penn Square East, Suite 511, Philadelphia, PA 19107

**Protection of Personally Identifiable Information (PII):**

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the findings in the attached report do not contain any student PII. Instead, each finding references students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Wesley's Program Review Report. In addition, Appendices B, C, D and E 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 July 1, 2013 program review report. If Wesley College 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 Wesley College receives this FPRD. An original and four copies of the information Wesley College 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

Wesely College'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 Wesley College's appeal will be those provided in 34 C.F.R. Part 668, Subpart H.

Interest on the appealed liabilities shall continue to accrue at the applicable value of funds rate, as established by the United States Department of Treasury, or if the liabilities are for refunds, at the interest rate set forth in the loan promissory note(s).

**Record Retention:**

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

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact Carmen L. Austin at (215) 656-8582. 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); (b)(7)(C)

Nancy P. Gifford  
Division Director

cc: Michael J. Hall, Financial Aid Administrator  
Middle States – Higher Education  
DE Higher Education Commission  
DE Delaware Department of Education

Enclosures:

Wesely College's Program Review Report  
Wesley College's Program Review Response  
Wesley College's File Review for Finding #4  
The Department's Detailed Analysis for Finding #4  
Cost of Funds Worksheet for Finding #4  
Estimated Actual Loss Worksheet for Finding #5

**Prepared for  
Wesley College**

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

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**OPE ID: 00143300  
PRCN: 201320328198**

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

# Final Program Review Determination February 7, 2014

School Participation Division - Philadelphia  
The Wanamaker Building, 100 Penn Square East, Suite 511, Philadelphia, PA 19107  
[StudentAid.gov](http://StudentAid.gov)

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## **B. Scope of Review**

The U.S. Department of Education (the Department) conducted a program review at Wesley College from February 25, 2013 to March 1, 2013. Ms. Carmen L. Austin and Mr. Manuel Loera conducted the review.

The focus of the review was to assess Wesley College's administration of the Title IV programs and, specifically, its compliance with the Return To Title IV (R2T4) requirements. The review consisted of an examination of Wesley College's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, and student account ledgers.

A sample of 30 files was identified for review from the 2011-2012 and 2012-2013 (year to date) award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the names and 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 Wesley College'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 Wesley College of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

## **C. Findings and Final Determinations**

### **Findings with Final Determinations**

The program review report findings requiring further action are summarized below. At the conclusion of each finding is a summary of Wesley College's response to the finding, and the Department's final determination for that finding. The program review report was issued on July 1, 2013.

### **Finding 1: Return of Title IV Calculation Errors**

**Citation Summary:** When a title IV recipient withdraws from an institution, the institution must determine the amount of title IV assistance earned by the student as of the student's withdrawal date. 34 C.F.R. § 668.22(a)(1).

If the amount of Title IV assistance the student has earned is less than the amount disbursed to that student, the difference between these amounts must be returned to the Title IV programs. 34 C.F.R. § 668.22 (a)(3)(i).

The institution must calculate the percentage of the Title IV funds earned by the student. 34 C.F.R. § 668.22 (e)(1)(i). The percentage earned is equal to the percentage of the payment period completed as of the student's withdrawal date. 34 C.F.R. § 668.22 (e)(2)(i). The institution calculates the percentage of the payment period completed by dividing the total number of calendar days in the payment period into the number of calendar days completed in that period as of the student's withdrawal date. 34 C.F.R. § 668.22 (f)(1)(i).

The total number of calendar days in a payment period or period of enrollment includes all days within the period that the student was scheduled to complete, except that scheduled breaks of at least five consecutive days are excluded from the total number of calendar days in a payment period or period of enrollment and the number of calendar days completed in that period. 34 C.F.R. § 668.22 (f)(2)(i).

**Noncompliance Summary:** Wesley failed to calculate accurately Return to Title IV (R2T4) amounts for 10 students. Specifically, Wesley failed to exclude scheduled breaks of five days or more when determining the percentage of Title IV aid earned.

**Required Action Summary:** Wesley was required to review its policies and procedures to ensure that they are sufficient to prevent a recurrence of this finding. In addition, the institution was required to submit any changes to its policies with its response to the program review report.

**Wesley's Response Summary:** In its response submitted on August 30, 2013, Wesley stated that the reason for the Return of Title IV (R2T4) errors was due to the institution's failure to exclude 5 days or more when determining the percentage of Title IV aid earned.

Wesley submitted revised policies and procedures for three sections of their Title IV financial aid policies and procedures manual that pertain to the Business Office Standard Operating Procedures, Standard Operating Procedures for Unofficial Withdrawals, and the Financial Aid Return of Title IV (R2T4) Standard Operation Procedures. Wesley stated that these policies and procedures will ensure that charges are current and the numbers of calendar days are entered appropriately. Wesley's response is included as Appendix B.

**Final Determination:** The Department reviewed Wesley's response and revised policies and procedures. Wesley must follow these revised policies and procedures to ensure that accurate Return of Title IV (R2T4) calculations are performed for all students.

**Finding 2: Inaccurate/Late Reporting to National Student Loan Database System**

**Citation Summary:** Participating institutions are required to confirm and report enrollment status of students receiving Title IV loans. This reporting process is called Student Status Confirmation Reporting (SSCR) and the enrollment data is reported to National Student Loan Data System (NSLDS). The Department incorporated Enrollment Reporting into NSLDS to centralize and automate fully the enrollment verification system.

An institution shall, upon receipt of a Student Status Confirmation Report (SSCR) from the Secretary or a similar report from any guaranty agency, complete and return that report within 30 days of receipt. Unless the institution expects to submit its next SSCR to the Secretary or the guaranty agency within the next 60 days, the institution must notify the Secretary, guaranty agency or the lender within 30 days if:

- The institution discovers that a Federal loan has been made to or on behalf of a student who enrolled at that school, but who has ceased to be enrolled on at least a half-time basis;
- The institution discovers that a Federal loan has been made to or on behalf of a student who has been accepted for enrollment at that school, but who failed to enroll on at least a half-time basis for the period for which the loan was intended;
- The institution discovers that a student who is enrolled has changed his or her permanent address. 34 C.F.R. § 685.309(b).

**Noncompliance Summary:** Wesley inaccurately and reported late the withdrawal dates for 13 students, and Wesley failed to update the enrollment status for three of these students.

**Required Action Summary:** Wesley was required to conduct a file review for all students who withdrew during the 2011-2012 and 2012-2013 award years to determine if it reported accurate withdrawal dates to NSLDS and provide the results of its file review with its response to the program review report. Additionally, Wesley was required to update any inaccurate withdrawal dates it identified within NSLDS. Lastly, Wesley was required to report the correct enrollment status for the three students specifically noted in the program review report.

**Wesley's Response Summary:** In its response submitted on August 30, 2013, Wesley indicated that the reason for Inaccurate/Late Reporting to the National Student Loan Database System was due to inconsistencies in the software fields used to create the updates to the National Student Loan Database System.

Wesley also indicated that a file review was conducted for all students in the 2011-2012 and 2012-2013 award years to determine if it reported accurate withdrawal dates to NSLDS. Wesley noted that withdrawal dates have been updated for students identified in its file review.

On January 30, 2014, the Department received a subsequent response from Wesley College. Wesley summarized the results of its file review in a spreadsheet and determined that it reported inaccurate withdrawal dates to NSLDS for 106 students. Specifically, inaccurate withdrawal dates were reported for 51 students for the 2011-2012 award year and 55 students for the 2012-2013 award years.

Lastly, Wesley revised its policies and procedures to strengthen its process for reporting to the National Student Loan Database System. Wesley's response is included as Appendix B.

**Final Determination:** The Department reviewed Wesley's January 30, 2014 response and conducted an analysis of the file review by sampling 58 students who withdrew during the 2011-2012 and 2012-2013 award years to determine if Wesley accurately reported withdrawal dates to NSLDS. The Department did not identify any discrepancies with the revised information reported to NSLDS.

In addition, the Department has reviewed Wesley's updated policies and procedures, and has determined that the institution has strengthened its process for reporting to the National Student Loan Database System. Wesley must follow these revised policies and procedure to prevent a reoccurrence of this finding.

### **Finding 3: Failure to Conduct Exit Counseling**

**Citation Summary:** Institutions that participate in the Title IV programs are required to ensure that exit counseling is conducted with each Direct Loan borrower shortly before the student borrower ceases at least half-time study at the institution. If the student borrower withdraws from school without the school's prior knowledge, or fails to complete the exit counseling as required, the school must provide the exit counseling materials to the student through interactive electronic means or by mailing the materials within 30 days after learning that the student has withdrawn from the program. The school must maintain documentation substantiating the school's compliance with this section for each student borrower. 34 C.F.R. § 685.304(b)(7).

**Noncompliance Summary:** Wesley failed to conduct and document exit counseling for 13 students. Additionally, the institution did not have an established process to ensure that students receive exit counseling materials.

**Required Action Summary:** Wesley was required to conduct a file review of all students who graduated or withdrew from the institution during the 2011-2012 and 2012-2013 award years, and to identify that exit counseling was conducted. In addition, Wesley was required to send appropriate exit counseling materials to any students for whom it could not document that exit counseling was conducted. Wesley was also required to provide a list of these students with its response to the program review report, along with supporting documentation that exit counseling materials has been provided to each of the students.

Lastly, Wesley was required to update its policies and procedures to formalize the exit counseling process and submit the updated policies and procedures with its response to the program review.

**Wesley's Response Summary:** In its response submitted on August 30, 2013, Wesley conducted a file review for all students who graduated or withdrew from the institution during the 2011-2012 and 2012-2013 award years. Wesley identified 107 students that either graduated or withdrew for whom the institution failed to conduct or document exit counseling. Wesley mailed a customized exit packet to each student's most recent address as reported to the Office of Institutional Advancement. The exit packets were sent by "certified mail" and copies of the receipts were included with its response to the program review report.

Wesley also indicated that the institution did not have an established process for documenting that exit counseling was provided. As a remedy for failing to provide and document exit counseling, Wesley has established a formal process as part of their policies and procedure. The institution contracted with a third party servicer "Mapping Your Future" to provide exit counseling, along with other default prevention services. "Mapping Your Future" monitors regulatory changes and updates online counseling sessions to ensure that online counseling sessions meet regulatory requirements. "Mapping Your Future" also provides both online and printable exit counseling materials that Wesley can download and distribute to their student loan borrowers to help fulfill exit counseling requirements.

Lastly, Wesley added a standard operating procedure to strengthen its process for conducting exit counseling. Wesley's response is included as Appendix B.

**Final Determination:** The Department reviewed Wesley's response and identified 107 students who did not receive exit counseling. Specifically, for the 2011-2012 award years, five graduate and 58 withdrawn students were identified who did not receive exit

counseling; and for the 2012-2013 award years, one graduate and 43 withdrawn students were identified who did not receive exit counseling.

The Department reviewed all 107 students identified in the file review who did not receive exit counseling, and the Department determined that exit counseling has been provided to all students by examining the “certified mail receipts” that were mailed to each student.

In addition, the Department reviewed Wesley’s updates to its policies and procedures, intended to strengthen and formalized its process for conducting exit counseling. Wesley must follow these revised policies and procedure to prevent a reoccurrence of this finding.

#### **Finding 4: Failure to Complete Verification**

**Citation Summary:** An institution shall require each applicant whose application is selected for verification by the Central Processing System (CPS) to verify the information used to determine the applicant’s EFC. 34 C.F.R. § 668.54(a)(1). An applicant selected for verification must submit acceptable documentation that will verify or update the following elements: Household size; Number in College; Adjusted Gross Income (AGI); U.S. Taxes Paid; certain types of untaxed income and benefits; and all other untaxed income included on the U.S. Income Tax Return. 34 C.F.R. § 668.56(a).

**Noncompliance Summary:** Wesley failed to complete verification for five students who were selected for verification during the 2011-2012 award years. Specifically, the institution failed to include the “Making Work Pay” credit as untaxed income.

**Required Action Summary:** Wesley was required to conduct a file review of all students selected for verification during the 2011-2012-award year. In addition, the institution was required to review its policies and procedures to ensure that verification is completed accurately.

**Wesley’s Response Summary:** In its response submitted on August 30, 2013, Wesley conducted a file review of all students selected for verification during the 2011-2012 award years. Wesley also provided revised policies and procedures to ensure that verification will be completed accurately. Wesley’s response is included as Appendix B.

**Final Determination:** The Department reviewed Wesley’s response and found that the institution failed to complete verification for 242 students. Specifically, the institution failed to include the “Making Work Pay” credit as untaxed income for these students.

The Department conducted an analysis of the 242 students and determined that 122 students received incorrect Federal Pell Grant disbursements. The amount of incorrect Federal Pell Grant disbursements ranged from \$38 to \$555.

Based on this information, the total amount of incorrect Federal Pell Grant funds that was disbursed is \$16,602.00. The Department's analysis is included as Appendix D. The Federal Direct Subsidized Loans were not impacted as a result of this finding.

Further, the Department incurs a cost when it makes funds available to an institution because it borrows those funds from the U.S. Treasury and must pay interest charges on those funds. The Department has determined that the cost to the government of the improperly retained Federal Pell Grant funds is \$269.32. The result of that calculation, to date, is included as Appendix E.

Finally, Wesley must make the Common Origination and Disbursement (COD) student-level adjustments for the Federal Pell Grant disbursements identified in Appendix D prior to the repayment of the liability.

The total liability to be remitted for this finding is \$16, 871.32. Section E of this letter provides instructions for the repayment of this liability.

#### **Finding 5: Improper Disbursement of Unsubsidized Direct Loan**

**Citation Summary:** In the case of an independent undergraduate student who has successfully completed the first year of an undergraduate program but has not successfully completed the second year of an undergraduate program, the total amount the student may borrow for any academic year of student under the Federal Direct Stafford Loan Program may not exceed \$4,500 subsidized and \$6,000 unsubsidized Direct Loans. 34 C.F.R. § 685.203.

**Noncompliance Summary:** Wesley exceeded the unsubsidized annual loan limit for one student. According to the institution's policies, the institution considers a student with 56 credits a second year student. However, the institution awarded \$7,000 in unsubsidized loans. The maximum amount of unsubsidized Direct Loans for a second year student is \$6,000.

**Required Action Summary:** Wesley was required to review its policies and procedures to ensure that Direct Loans are awarded properly. Wesley was also required to submit any changes with its response to the program review report.

**Wesley's Response Summary:** In its response submitted on August 30, 2013, Wesley indicated this was an isolated incident; the student's subsidized portion of the Direct Loan was reduced to reflect the correct amount but the unsubsidized portion was not. Wesley's response is included as Appendix B.

**Final Determination:** The Department reviewed the institution's response and found that the institution awarded and disbursed a third year undergraduate student unsubsidized loan in the amount of \$7,000 while the student was a second year

undergraduate student. The maximum amount of unsubsidized loan funds for a second year student is \$6,000. The unsubsidized amount that was improperly disbursed was \$1,000.

In lieu of requiring the institution to assume the risk of default by purchasing the ineligible portion of the loan from the holder, the Department has asserted a liability not for the loan amount, but rather for the estimated actual or potential loss that the government may incur with respect to the ineligible loan or loan amounts. The estimated actual loss (EAL) to the Department that has resulted or will result from those ineligible loan disbursements is based on the institution's most recent cohort default rate available. The calculation resulted in no additional loss incurred by the government as a result of this finding. Therefore, no further action is required to resolve this finding. A copy of the results of the calculation is included as Appendix F.

**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)	
Finding #4	\$ 16,602.00	
<b>Subtotal 1</b>	\$ 16,602.00	
Interest/SA	\$ 269.32	
<b>Subtotal 2</b>	\$ 269.32	
<b>TOTAL</b>	\$ 16,871.32	
<b>Payable To:</b>		<b>Totals</b>
The Department	\$16,871.32	\$ 16,871.32

## E. Payment Instructions

### **Liabilities Owed to the Department**

Wesley College owes the Department **\$16,871.32**. 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 Section II – Instructions by Title IV, HEA Program (below), remit payment, and upon receipt of payment the Department will apply the funds to the appropriate G5 award (if necessary).*

**The following identification data must be provided with the payment:**

Amount: \$16,871.32  
DUNS: 067373803  
TIN: 510064335  
Program Review Control Number: 201320328198

### **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. Wesley College 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 Wesley College'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 6114  
Washington, DC 20202-4461

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

## **F. Appendices**

Appendix A, Wesley's Program Review Report, Appendix B, Wesley's Program Review Response, Appendix C, Wesley's File Review for Finding #4, Appendix D, The Department's Detailed Analysis for Finding #4 and Appendix E, Cost of Funds Worksheet contain personally identifiable information and will be emailed to Wesley College as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file(s) will be sent in a separate email. Appendix E, Estimated Actual Loss Formula (EAL), is attached to this report.



July 1, 2013

Dr. William N. Johnston, President  
Wesley College  
120 North State Street  
Dover, DE 19901-3875

UPS Tracking Number  
1ZA5467Y0195740883

RE: **Program Review Report**  
OPE ID: 00143300  
PRCN: 201320328198

Dear Dr. Johnston:

From February 25, 2013 through March 1, 2013, Carmen Austin and Manuel Loera conducted a review of Wesley College's administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). The findings of that review are 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 review the report and respond to each finding, indicating the corrective actions taken by Wesley College. The response should include a brief, written narrative for each finding that clearly states Wesley College's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, Wesley College must provide supporting documentation as required in each finding.

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 report<sup>1</sup> and relevant materials related to the report before any final program review report is issued;
- (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.

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

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 FPRD. However, it will be retained and available for inspection by Wesley College 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 FPRD is issued.

The institution's response should be sent directly to Carmen L. Austin of this office within 60 calendar days of receipt of this letter.

**Protection of Personally Identifiable Information (PII):**

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the findings in the attached report do 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. Please see the enclosure Protection of Personally Identifiable Information for instructions regarding submission to the Department of required data / documents containing PII.

**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 Carmen L. Austin at (215) 656-8582 or carmen.austin@ed.gov.

Sincerely,

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

John S. Loreng  
Compliance Manager

cc: Michael Hall, Financial Aid Administrator

Enclosure:  
Protection of Personally Identifiable Information

Prepared for  
**Wesley College**

**Federal Student**  
AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

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**OPE ID: 00143300**  
**PRCN: 201320328198**

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

## Program Review Report

July 1, 2013

© 2013 Student Aid Center  
1000 East Washington Avenue, Suite 100  
Philadelphia, PA 19106  
(215) 260-1000

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**A. Institutional Information**

Wesley College  
 120 North State Street  
 Dover, DE 19901-3875

Type: Private, Nonprofit

Highest Level of Offering: Master's or Doctor's Degree

Accrediting Agency: Middle States - Higher Education

Current Student Enrollment: 1931 (2011-2012)

% of Students Receiving Title IV: 84.3% (2011-2012)

Title IV Participation:

2011-2012 Award Years	
Federal Pell Grant	\$3,166,457.00
Federal Supplemental Educational Opportunity Grant	\$223,269.00
Federal Work Study (FWS) Program	\$269,498.00
Federal Perkins Loan Program	\$14,26.00
William D. Ford Federal Direct Loan Program	\$17,018,707.00

Default Rate FFEL/DL:      2010: 12.3%  
    2009: 10.6%  
    2008: 10.1%

Default Rate Perkins:      2011: 43.9%  
    2010: 33.3%  
    2009: 23.3%

## **B. Scope of Review**

The U.S. Department of Education (the Department) conducted a program review at Wesley College from February 25, 2013 to March 1, 2013. Ms. Carmen L. Austin and Mr. Manuel Loera conducted the review.

The focus of the review was to assess Wesley College's administration of the Title IV programs and, specifically, its compliance with the Return To Title IV (R2T4) requirements. The review consisted of an examination of Wesley College's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, and student account ledgers.

A sample of 30 files was identified for review from the 2011-2012 and 2012-2013 (year to date) award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. Appendix A lists the names and 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 Wesley College'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 Wesley College 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 Wesley College to bring operations of the financial aid programs into compliance with the statutes and regulations.

### **Finding # 1: Return of Title IV (R2T4) Calculation Errors**

**Citation:** When a title IV recipient withdraws from an institution, the institution must determine the amount of title IV assistance earned by the student as of the student's withdrawal date. 34 C.F.R. § 668.22(a)(1).

If the amount of Title IV assistance the student has earned is less than the amount disbursed to that student, the difference between these amounts must be returned to the Title IV programs.<sup>34</sup> C.F.R. § 668.22 (a)(3)(i).

The institution must calculate the percentage of the Title IV funds earned by the student. 34 C.F.R. § 668.22 (e)(1)(i). The percentage earned is equal to the percentage of the payment period completed as of the student's withdrawal date. 34 C.F.R. § 668.22 (c)(2)(i). The institution calculates the percentage of the payment period completed by dividing the total number of calendar days in the payment period into the number of calendar days completed in that period as of the student's withdrawal date. 34 C.F.R. § 668.22 (f)(1)(i).

The total number of calendar days in a payment period or period of enrollment includes all days within the period that the student was scheduled to complete, except that scheduled breaks of at least five consecutive days are excluded from the total number of calendar days in a payment period or period of enrollment and the number of calendar days completed in that period.

**Noncompliance:** Wesley failed to calculate accurate Return to Title IV (R2T4) amounts for students # 1, 8, 12, 13, 14, 16, 21, 22, 23, and 24. Wesley failed to exclude scheduled breaks of five days or more when determining the Percentage of Title IV Aid Earned. As a result, Wesley returned funds to the Title IV programs that the students had earned. The chart below provides additional details.

Student #	Total # of days used	Total # of days that should have been used	Percentage earned before excluding scheduled breaks	Percentage earned after excluding scheduled breaks	Total amount of funds returned	Total amount of funds that should have been returned	Total amount of funds returned in excess	Title IV Program to which the funds were returned
1	110	105	49.1%	51.4%	\$6,337.56	\$6,051.19	\$286.00	PELL
8	110	104	60.0%	63.5%	\$3,154.80	\$0.00	\$3,154.80	PELL, Sub, Unsub
12	110	104	40.0%	42.7%	\$4,501.20	\$4,298.15	\$203.05	Subsidized
13	110	105	48.2%	50.5%	\$3,114.22	\$2,975.94	\$139.00	PELL
14	110	105	26.4%	27.6%	\$5,887.26	\$5,791.28	\$95.98	PELL
16	110	105	29.1%	30.5%	\$5585.50	\$5475.21	\$110.29	PELL
21	110	105	51.8%	54.3%	\$3683.93	\$3,492.86	\$190.00	Unsubsidized
23	110	105	60.0%	62.9%	\$2561.20	\$0.00	\$2,561.20	Unsubsidized
24	110	105	59.1%	61.9%	\$3,222.10	\$0.00	\$3,222.10	Unsubsidized

For student #22, the institution failed to include the correct number of calendar days for the term. In addition, the institution failed to exclude scheduled breaks of five days or more when determining the Percentage of Title IV Aid Earned. As a result, the student earned 22.4% of the Title IV funds disbursed, and the institution was required to return \$10,556.70 to the Department.

<sup>1</sup> For student #8, \$995 in Unsubsidized Direct Loans, \$1742 Subsidized Direct Loans and \$417.80 in Federal Pell Grant Funds were returned for this student. As a result of the revised calculation, the student earned all of the Title IV funds.

The Title IV Programs and amounts for which these funds were returned included \$990 in Unsubsidized Direct Loans, \$1,733.00 Subsidized Direct Loans, and \$7,833.70 in Federal Direct Plus Loans.

During the on-site review, Wesley revised the R2T4 calculation for student #22 to include the correct number of calendar days, and to exclude the scheduled breaks. As a result, the student earned 14.9% of the Title IV funds disbursed, and the institution was required to return an additional \$1,020 in Direct Plus Loans.

The institution returned the additional funds due and provided documentation that the funds were returned to the appropriate Title IV programs.

An institution's failure to determine the amount of Title IV funds earned by a student who withdraws may result in the institution returning funds to which the institution is entitled.

**Required Action:** Wesley must review its policies and procedures to ensure that they are sufficient to prevent a recurrence of this finding. Wesley must submit any changes to its policies with its response to this program review report.

#### **Finding # 2: Inaccurate/Untimely Reporting to National Student Loan Database System**

**Citation:** Participating institutions are required to confirm and report enrollment status of students receiving Title IV loans. This reporting process is called Student Status Confirmation Reporting (SSCR) and the enrollment data is reported to National Student Loan Data System (NSLDS). The Department incorporated Enrollment Reporting into NSLDS to centralize and automate fully the enrollment verification system.

An institution shall, upon receipt of a Student Status Confirmation Report (SSCR) from the Secretary or a similar report from any guaranty agency, complete and return that report within 30 days of receipt. Unless the institution expects to submit its next SSCR to the Secretary or the guaranty agency within the next 60 days, the institution must notify the Secretary, guaranty agency or the lender within 30 days if:

- The institution discovers that a Federal loan has been made to or on behalf of a student who enrolled at that school, but who has ceased to be enrolled on at least a half-time basis;
- The institution discovers that a Federal loan has been made to or on behalf of a student who has been accepted for enrollment at that school, but who failed to enroll on at least a half-time basis for the period for which the loan was intended;
- The institution discovers that a student who is enrolled has changed his or her permanent address. 34 C.F.R. § 685.309(b).

**Noncompliance:** Wesley incorrectly reported the withdrawal dates for students # 1, 8, 12, 13, 14, 21, and 24 Wesley untimely reported withdrawal dates for students # 1, 4, 8, 13, 14, 16, 21, 22, 23, and 24. Lastly, Wesley failed to update the enrollment status for students # 16, 22 and 23. The chart below provides additional details.

Student #	Withdrawal date per student's file	Withdrawal date reported to NSLDS	Required Reporting Date	Date Reported by Institution	# of Days Late
1	10/18/2011	12/09/2011	12/17/2011	1/18/2012	33
4	4/27/2012	4/27/2012	6/26/2012	8/31/2012	67
8	3/14/2012	4/27/2012	5/13/2012	8/31/2012	111
12	2/21/2012	2/27/2012	4/21/2012	3/26/2012	N/A
13	10/13/2011	12/09/2011	12/12/2011	1/18/2012	38
14	9/19/2011	12/09/2011	11/18/2011	1/18/2012	62
16	9/20/2012	N/R	11/19/2012	N/R	163
21	10/15/2012	12/7/2012	12/14/2012	1/25/2013	43
22	1/28/2012	N/R	3/28/2012	N/R	399
23	10/24/2012	N/R	12/23/2012	N/R	129
24	10/23/2012	12/7/2012	12/23/2012	1/25/2013	34

For students # 16, 22 and 23, the withdrawal status was not reported (N/R) to NSLDS. In all three instances, the students were reported full- time but had withdrawn from the institution. The last day of the on-site program review was used to determine the # of days late for the students who were not reported.

Accurate enrollment information is a vital component of the federal student loan programs. The information reported to NSLDS determines if the student is still considered in school, must be moved into repayment, or is eligible for an in-school deferment. For students moving into repayment, the effective withdrawal date determines when the grace period begins and how soon a student must begin repaying loan funds.

**Required Action:** Wesley must report the correct enrollment status for students # 16, 22, and 23. Additionally, Wesley must conduct a file review for all students who withdrew during the 2011-2012 and 2012-2013 award years to determine if it reported accurate withdrawal dates to NSLDS. Wesley must update any inaccurate withdrawal dates it identifies within NSLDS. Further, Wesley must provide the results of its file review in a spreadsheet and include the following data.

1. Student's Name;
2. Social Security Number;
3. Withdrawal Date originally reported to NSLDS; and
4. Updated Withdrawal Date.

Wesley must provide the spreadsheet in both electronic and hardcopy formats. Wesley must review its policies and procedures to ensure that they are sufficient to prevent a recurrence of this finding. Lastly, Wesley must submit any changes to its policies with its response to this program review report.

### **Finding # 3: Failure to Conduct Exit Counseling**

**Citation:** Institutions that participate in the Title IV programs are required to ensure that exit counseling is conducted with each Direct Loan borrower shortly before the student borrower ceases at least half-time study at the institution. If the student borrower withdraws from school without the school's prior knowledge, or fails to complete the exit counseling as required, the school must provide the exit counseling materials to the student through interactive electronic means or by mailing the materials within 30 days after learning that the student has withdrawn from the program. The school must maintain documentation substantiating the school's compliance with this section for each student borrower. 34 C.F.R. § 685.304(b)(7).

**Noncompliance:** Wesley failed to conduct and document exit counseling for students # 1, 4, 5, 6, 12, 13, 15, 16, 21, 22, 23, 24, and 25. The institution does not have a formal process in place to ensure that students receive exit counseling materials.

An institution's failure to conduct and document exit counseling for its students may result in increased student loan defaults and cause increased expense for the Department.

**Required Action:** Wesley must conduct a file review of all students who graduated or withdrew from the institution during the 2011-2012 and 2012-2013 award years in order to verify that exit counseling has been performed for each student. Wesley must send appropriate exit counseling materials to any students for whom it cannot document previous exit counseling, and Wesley must document that exit counseling has been provided to these students. Further, Wesley must provide a list of these students with its response to this program review report, along with supporting documentation that exit counseling materials has been provided to each of the students.

Additionally, Wesley must update its policies and procedures to formalize the exit counseling process and submit the updated policy with its response to this report. These updated policies and procedures should ensure that the institution attempts to provide in-person exit counseling with each student and that the exit counseling process is documented.

### **Finding 4: Failure to Complete Verification**

**Citation:** An institution shall require each applicant whose application is selected for verification by the Central Processing System (CPS) to verify the information used to determine the applicant's EFC. 34 C.F.R. § 668.54(a)(1). An applicant selected for verification must submit acceptable documentation that will verify or update the following elements: Household size; Number in College; Adjusted Gross Income (AGI); U.S. taxes paid; certain types of

untaxed income and benefits; and all other untaxed income included on the U.S. income tax return. 34 C.F.R. § 668.56(a).

**Noncompliance:** Wesley failed to complete verification for students #4, 7, 8, 10, and 13.

Specifically, for students #4, 7, 8, 10 and 13, the 2010 U.S. Income Tax Return listed an \$800 "Making Work Pay" credit for each student; however, the ISIR did not reflect this amount under untaxed income as required.

Wesley recalculated the Expected Family Contribution (EFC) for the following students to include the additional \$800 in untaxed income on the Institutional Student Information Record (ISIR). The chart below provides the results:

Student #	Original EFC	Original Pell Award	Adjusted EFC	Adjusted Pell Award
4	4073	\$1,500	4277	\$1,300
7	0	\$5,550	90	\$5,500
8	1115	\$4,400	1140	\$4,400
10	1358	\$4,200	1527	\$4,000
13	0	\$5,550	0	\$5,550

The additional untaxed income did not have an impact on eligibility for student #8 and 13. Failure to properly complete verification may result in the institution receiving funds to which it is not entitled and may cause an increase expense to the Department.

**Required Action:** Wesley must conduct a file review for all Title IV recipients to determine if Wesley properly completed verification for all students selected for the 2011-2012 award years. Wesley must compile the results of the file review in a spreadsheet and provide the spreadsheet in both hard copy and electronic format; and provide it with its response to the program review report.

The spreadsheet should include the following items:

1. Student last name;
2. Student first name;
3. Social Security Number;
4. Was verification performed correctly (yes/no);
5. Original EFC;
6. Adjusted EFC;
7. Original scheduled Pell award;
8. Recalculated scheduled Pell award based on new EFC, if applicable;
9. Recalculated Subsidized Direct Loan eligibility based on new EFC, if applicable;
10. Provide the G5 Award Number for the Applicable Program; if over award occurred.

If Wesley discovers as a result of the file review that verification was not completed properly for any of the students, the institution must attempt to complete verification process.

For all students selected for verification for the 2011-2012 award years, Wesley must also submit the following documentation in alphabetical order:

1. Student Account Summary with the 2011-2012 award year funds identified;
2. The 2011-2012 ISIR that Wesley processed Title IV funds from;
3. Revised aid calculation with the new EFC identified, if applicable.

In addition, Wesley must review its policies and procedures to ensure that verification is completed accurately. Wesley must submit any changes to its policies with its response to this program review report.

Instructions for the repayment of any determined liability amount will be provided in the Final Program Review Determination Letter.

#### **Finding 5: Improper Disbursement of Unsubsidized Direct Loan**

**Citation:** In the case of an independent undergraduate student who has successfully completed the first year of an undergraduate program but has not successfully completed the second year of an undergraduate program, the total amount the student may borrow for any academic year of study under the Federal Direct Stafford Loan Program may not exceed \$4500 subsidized and \$6,000 unsubsidized direct loans. 34 C.F.R. § 685.203.

**Noncompliance:** Wesley exceeded the unsubsidized annual loan limit for one student.

Specifically, student #21 began the Fall 2012 term with 56 credits earned. According to the institution's policies and procedures, a student with 56 credits earned is considered a second year student. However, the institution awarded \$7000 in unsubsidized loans. The maximum unsubsidized loan for a student who has not successfully completed the second year of an undergraduate program is \$6000.

Failure to properly award Direct Loans results in the improper use of Title IV funds and causes an increased expense to the Department.

**Required Action:** Wesley must review its policies and procedures to ensure that Direct Loans are awarded properly. Wesley must submit any changes to its policies with its response to this program review report.

Instructions for the repayment of any determined liability amount will be provided in the Final Program Review Determination Letter.

**D. Appendices**

**Appendix A: Student Sample**

**Student Sample: 2011-2012**

<u>Student No.</u>	<u>Name</u>	<u>Social Security Number</u>
1.	(b)(6); (b)(7)(C)	010-20-1405
2.		
3.		
4.		
5.		
6.		
7.		
8.		
9.		
10.		
11.		
12.		
13.		
14.		
15.		

**Student Sample: 2012-2013**

<u>Student No.</u>	<u>Name</u>	<u>Social Security Number</u>
16.	(b)(6); (b)(7)(C)	
17.		
18.		
19.		
20.		
21.		
22.		
23.		
24.		
25.		
26.		
27.		
28.		
29.		
30.		

## **Appendix B: Protection of Personally Identifiable Information**

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual that can be used to distinguish or trace an individual's identity (e.g., name, social security number, date and place of birth).

PII submitted electronically or on media (e.g., CD-ROM, floppy disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip (Version 9.0) and are encrypted with AES encryption. Zipped files using WinZip must be saved as Legacy compression (Zip 2.0 compatible).

The Department must receive an access password to view the encrypted information. The password must be e-mailed separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).

Hard copy files and media containing PII must be:

- sent via a shipping method that can be tracked with signature required at delivery
- double packaged in packaging approved by the shipping agent (FedEx, UPS, USPS)
- labeled with both the "To" and "From" addresses on both inner and outer packages
- identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender).

PII data cannot be sent via fax.

Prepared by:



OPE ID: 00143300  
PRCN: 201320328198

## Program Review Response August 30, 2013

120 North State Street  
Dover, DE 19901-3875

## Wesley College Mission Statement

Wesley College is a United Methodist institution of higher education that seeks to be among the finest student-centered learning communities in the liberal arts tradition. Consistent with our Methodist heritage, the College affirms meaning and purpose in life through justice, compassion, inclusion and social responsibility that enhance community life and respect for the environment. Wesley College exists to liberate and empower its students with the knowledge, skills, ethical attitudes and capacity for critical thinking needed to achieve personal and professional goals and to contribute to the local and global society.

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## Finding #1: Return of Title IV (R2T4) Calculation Errors:

Description: Wesley failed to calculate accurate Return to Title IV (R2T4) amounts for students.

The Regulation: Sec. 668.22 Treatment of title IV funds when a student withdraws.

(a) General. (1) When a recipient of title IV grant or loan assistance withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, the institution must determine the amount of title IV grant or loan assistance (not including Federal Work-Study or the non-Federal share of FSEOG awards if an institution meets its FSEOG matching share by the individual recipient method or the aggregate method) that the student earned as of the student's withdrawal date in accordance with paragraph (c) of this section.

### Scheduled Breaks

34 CFR 668.22(f) (2) (i)

2)(i) The total number of calendar days in a payment period or period of enrollment includes all days within the period, except that scheduled breaks of at least five consecutive days are excluded from the total number of calendar days in a payment period or period of enrollment and the number of calendar days completed in that period.

Also: from the Federal Student Aid Handbook (FSA HB) Volume 5 Chapter 2 Part 2 "Percentage of Aid Earned:"

### Determining the Length of a Scheduled Break

1. Determine the last day that class is held before a scheduled break—the next day is the first day of the scheduled break.

2. The last day of the scheduled break is the day before the next class is held. Where classes end on a Friday and do not resume until Monday following a one week break, both weekends (four days) and the five weekdays would be excluded from the Return calculation. (The first Saturday, the day after the last class, is the first day of the break. The following Sunday, the day before classes resume, is the last day of the break).

If classes were taught on either weekend for the programs that were subject to the scheduled break, those days would be included rather than excluded.

The Reason for the Error: Failure to exclude scheduled breaks of 5 days or more when determining the Percentage of Title IV Aid Earned.

Action Taken or Policy Implemented: Before the academic year starts the institutional charges are entered for the upcoming semesters (fall, spring). Once the institutional charges are entered the school calendar profile will be entered. A copy of both the institutional charges and school calendar will be printed off and there will be a meeting with the Director of Financial Aid, the Controller for the college and the Supervisor for Business Operations to verify that the charges and the calendar are entered with the correct information.

TITLE IV PROCESSING: *Business Office Standard Operating Procedure (SOP)*

1. Once the Finance Office has received the official withdrawal form from Student Life a student statement is printed to show the federal funds that have been disbursed to the students.
2. Then the responsible person for processing Title IV logs into the official website and select return of Title IV funds on the web, enter TG 53206, Federal School Code 001433 and next it will ask you for a code you need to use the mini token for that number.
3. They then create a new record, enter the social security number and student address information and submit.
4. Go to the R2T4 tab at the top of the page.
5. Enter award year drop down will give you the information to select what year.
6. Calendar profile drop down will give you the information to select what semester.
7. School requires outside attendance always select NO.
8. Withdrawal type is 1 begin official withdrawal.
9. Date form completed; enter the date the student entered.
10. Date of the school withdrawal; enter the date the student entered.

11. Enter the Pell, SEOG amounts if the student received a disbursement.
12. Enter the unsubsidized direct loan, subsidized direct loan, and Parent plus Direct loan amounts if the student received a disbursement.
13. Go to step 5 and pull in tuition using the drop down, once that is done, submit.
14. Now submit the complete R2T4 and scroll down to the bottom of the page and check view printable page and print. Save R2T4 to the official withdrawal excel file.
15. Sign off on the College withdrawal form as "accounting supervisor." Make copies for the financial planning office, Registrar, and forward original official withdrawal back to the Student Affairs Office.

#### Title IV Processing: *Standard Operating Procedure: Unofficial Withdrawal*

Goal: Insure that the correct amount of Title IV Aid is disbursed to eligible students.

Procedures: Schools are required to match a student's Title IV eligibility with their enrollment status in order to insure the right students are receiving the right amount of federal aid. Enrollment status includes accounting for making sure students are actually taking classes, and also correctly reporting the number of credit hours they are enrolled. Wesley College implements several measures in order to safeguard the administration of federal funds.

First is the practice of creating a "census date." For financial aid purposes, our census date is 3 business days after the drop/add period. At that time, our staff checks enrollment status based on the records reported by the Registrar. Both federal and institutional financial aid is adjusted for each student based on the Registrar's records. Inherent in this process is cancelling aid for students not enrolled, and reducing aid for students not enrolled full-time.

Second is utilizing our network to report students who withdraw during the semester. Once a student officially withdraws, a calculation is performed to determine the amount of Title IV aid the student earned while attending, and how much must be returned. This "Return of Title IV Aid" (R2T4) is a formal process and is performed on every student Wesley knows withdraws.

Third is to account for students who do not officially withdraw, but who just ceased to attend or never attended. At the mid-point and at the end of each semester the Financial Aid Office creates a report of students who received failing grades, "Fs," in all of the courses in which they were registered. From this report, we can work to discern students who fall into the "unofficial withdrawal" category, and make the necessary returns.

In addition, the constant communication and coordination between Wesley's Business Office, Financial Aid Office, Student Life and Registrar throughout each semester serves to help prevent potential problems that could result in sanctions.

#### Title IV Processing: *Financial Aid R2T4 SOP*

The Office of Student Financial Aid receives the R2T4 calculation in addition to the withdrawal form from the Business Office. The necessary adjustments are then made in COD to the student's record and then transmitted to the student's Wesley account. The response files are checked to insure that the amounts in COD and the student's account match, and are correct. Those amounts are then sent to Wesley's Controller to determine if returns must be submitted to G5. If so, the returns are made by the Controller.

From the R2T4 form a determination can be made to determine if a student was entitled to a "post-withdrawal" disbursement. In other words, was all of the aid disbursed that could have been disbursed to the student's account? If a student qualifies for a "post-withdrawal" disbursement, they are given the opportunity to either except or reject the loan amounts. Processing of such disbursements is sent to COD and then to students accounts the same day.

## Finding #2: Inaccurate/Untimely Reporting to National Student Loan Database:

Description: Wesley incorrectly and untimely reported the withdrawal dates for students. In addition, Wesley failed to update enrollment status. The importance of this requirement goes to the core of the school demonstrating administrative capability and is noted as below in Chapter 1 of the NSLDS Reporting Guide.

The Regulation: *Chapter 1. Compliance, Guidelines, and Administrative Functions*

### *1.1 Basic Concept of Enrollment Reporting*

*Under provisions of the Higher Education Act, the Department's regulations, and related guidance, schools are required to confirm and report the enrollment status of students who receive most types of Federal student aid, including aid from the Federal Pell Grant Program, The Federal Family Education Loan (FFEL) Program, the William D. Ford Federal Direct Loan (Direct Loan) Program, and the Federal Perkins Loans (Perkins) Program. This process is called Enrollment Reporting [originally the Student Status Confirmation Report (SSCR)].*

*•Schools report the enrollment status of students who received Title IV aid to NSLDS.*

*•This enrollment information is updated in NSLDS and, as appropriate, is reported to guarantors, lenders, and servicers of federal student loans.*

*A student's enrollment status determines eligibility for in-school status, deferment and grace periods as well as for the Department's payment of interest subsidies to FFEL Program loan holders. Enrollment Reporting is not only critical for effective administration of the Title IV student loan programs, but is also required so that the Department can engage in budgetary and policy analysis."*

The Reason for the Error: Inconsistencies in the software fields used to create the updates.

Action Taken: A file review was conducted for all students in the 2011-2012 and 2012-2013 award years to determine if it reported accurate withdrawal dates to NSLDS. Withdrawal dates have been updated for students identified as having inaccurate dates previously reported. Please find attached a spreadsheet containing the following data:

1. Student's Name
2. Social Security Number
3. Withdrawal Date originally reported to NSLDS; and
4. Updated Withdrawal Date

Below are changes that have been made to policies and procedures:

#### STUDENT WITHDRAWAL PROCESS AND REPORTING TO NSC:

1. Once the Registrar's Office has received the official withdrawal form from The Business Office the person responsible for processing withdrawals, will mark their registration appropriately (give them W grades).
2. Once their status has been changed, we will then do a "NSC Update PT/FT and Status" update. This update will pull students information and look to see whose status has changed, from FT/PT to withdrawn.
3. When that update is complete, checks are performed on the "NSC Edit Registration Transactions" window in Jenzabar to make sure that the student is now listed as withdrawn and the "start date" reflects the official date of withdrawal.
4. Once the submission to NSC has been done each month, the Registrar will return to the NSC website to verify that all of the dates have been reported correctly.

## Finding #3: Failure to Conduct Exit Counseling

Description: Wesley failed to conduct exit counseling for students as described in FSA HB Volume 2 Chapter 6:

The Regulation: *If the student borrower drops out without notifying your school, you must confirm that the student has completed online counseling or mail exit counseling material to the borrower at his or her last known address. It is also acceptable to email the information to the borrower at his or her home (not school) email address, if you have that address. Note that you may send the print or PDF version of the Exit Counseling Guide for Federal Student Loan Borrowers to satisfy the exit counseling requirement. The material must be mailed or emailed within 30 days of your learning that a borrower has withdrawn or failed to participate in an exit counseling session. When mailing exit materials to a student who has left school, you're not required to use certified mail with a return receipt requested, but you must document in the student's file that the materials were sent. If the student fails to provide the updated contact information, you are not required to take any further action.*

The Reason for the Error: Lack of a Formal Process for requiring students to complete "Exit Counseling."

Action Taken: The file review conducted for the 2011-2012 and 2012-2013 award years identified 107 students that either graduated or withdrew who did not complete exit counseling (see attachments titled "'Exit Counseling Completed 11-12 and 12-13 AY'" and "Crosscheck-students without exit counseling"). Wesley has mailed a customized exit packet to each student's most recent address as reported to the Office of Institutional Advancement. Packets were sent by "certified" mail, and copies of the receipts are enclosed.

Please find the printable exit counseling materials that were mailed titled "DL Exit Counseling –Wesley College." under "Attachments."

As a remedy for failing to provide exit counseling Wesley has established a formal process as part of their policies and procedure. In addition, Wesley contracted with a third party servicer "Mapping Your Future" (<http://mappingyourfuture.org/FAP/>) to provide not just exit counseling, but also other default prevention services.

Mapping Your Future monitors regulatory changes and updates their Online Counseling sessions to make sure our counseling sessions meet regulatory requirements. They also provide educational games to help schools educate their students about money management and student loan management. These games can enhance your school's default prevention plan. And, most importantly to address the failure to provide

counseling Mapping Your Future provides both **online** and **printable exit counseling** materials that schools can download and distribute to the student loan borrowers to help fulfill exit counseling requirements.

The following has been added to Wesley's 'Policy and Procedure Guide' as a Standard Operating Procedure (SOP):

*In order to insure students receive "Exit Counseling," and are educated regarding their remaining balances, Return of Title IV Funds (R2T4) and "Exit Loan Counseling," Wesley has instituted a policy as part of their "Policy & Procedures Guide" of requiring a student, who officially withdraws, to attend an exit interview conducted by either a member of the Business Office or the Office of Student Financial Aid. At the interview, students will receive a print-out of their final charges, with any necessary adjustments, along with a review loan counseling material. In addition, a printable version of the materials will also be provided.*

*Students that do not "officially withdraw," or do not provide required notice will receive an e-mail with the link below to:*

*"Mapping Your Future" (<http://mappingyourfuture.org/Borrowers/requesting>)*

*The e-mail will request that the student complete the counseling session online. Once completed Wesley is notified that the requirement has been met and documents the completion. In addition, records of completed sessions are uploaded to NSLDS. If a student fails to complete the counseling session within 30 days, printed exit counseling materials will be sent to their address of record.*

*Those students who are not exempt from the requirement because they did not borrow federal funds, scheduled to graduate (based on petitions received by the Registrar) at the end of both the fall or spring semesters will receive a series of communications via e-mail and letter directing them to the "Mapping Your Future" site, with instructions on how to complete the exit counseling sessions. As counseling sessions are completed (Mapping Your Future provides a record each time a student completes a session) the student's record will be updated in PowerFAIDS and communications sent weekly to the Registrar and Business Office. Students who have not completed a session online will be given the opportunity to complete an in person session at Wesley's "GRAD FINALE", an event held at the end of each semester for graduating students. Student's not completing an "Exit Counseling" session before Commencement will not receive their official diploma until proof of completion.*

## Finding #4: Failure to Complete Verification

Description: Wesley failed to complete verification for students

The Regulation: From the 2011-2012 Application and Verification Guide Chapter 4:

### REQUIRED VERIFICATION ITEMS

If the CPS selects an application for verification, you must verify five major data elements:

- household size,
- number enrolled in college,
- adjusted gross income (AGI),
- U.S. income tax paid, and
- **certain untaxed income and benefits**

The Reason for the Error: Wesley failed to include the \$800 "Making Work Pay" credit as untaxed income. The addition of this untaxed income resulted in overpayments of Title IV funds

Action Taken: A file review was conducted of all Title IV recipients for whom verification was performed during the 2011-2012 award year. Verification was completed for these students, as requested, and the resulting EFC and award adjustments appear on spreadsheet titled "DOE Review Response Finding #4-Final."

In addition, also attached in hard copy is:

1. Student Account Summary with the 2011-2012 award year funds identified
2. The 2011-2012 ISIR that Wesley processed Title IV funds from
3. Revised aid calculation with the new EFC identified

Although the "Making Work Pay" credit is no longer available, and will not be a verification issue going forward, there are certain to be other similar changes that will affect verifications and must be taken into account each year. In preparation, sources like IFAP will be used to review and monitor verification requirements. Wesley's "Verification Worksheet" will be updated to reflect changes each award year to help insure that changes are not overlooked.

## Finding #5: Improper Disbursement of Unsubsidized Direct Loan

Description: Wesley failed to properly award Direct Loans resulting in the improper use of Title IV funds and an increased expense to the Department.

The Regulation: From the 2011-2012 FSA HB Volume 3 "Calculating Awards & Packaging Chapter 5" :

Stafford limits for a dependent undergraduate student:

For loan periods that include July 1, 2008, or begin on or after that date, dependent undergraduate students (excluding dependent undergraduates whose parents are unable to obtain PLUS Loans) are eligible for an additional \$2,000 in unsubsidized Stafford Loan funds each academic year (note that this additional eligibility is unrelated to and unaffected by the sunseting of the ECASLA special treatment of certain loan funds for purposes of the 90/10 rule).

For these students, the annual loan limits are:

- \$3,500 combined subsidized and/or unsubsidized plus \$2,000 additional unsubsidized for dependent first-year undergraduates;
- \$4,500 combined subsidized and/or unsubsidized plus \$2,000 additional unsubsidized for dependent second-year undergraduates; and
- \$5,500 combined subsidized and/or unsubsidized plus \$2,000 additional unsubsidized for dependent third-, fourth-, or fifth-year undergraduates.

These loan limits represent the total of all subsidized and unsubsidized Stafford Loans a dependent undergraduate student may borrow at each level of study for a single academic year. For example, a dependent first year undergraduate may receive up to \$5,500 in Stafford Loans for a single academic year, but no more than \$3,500 of this amount may be subsidized

The Reason for the Error: In this particular instance the student submitted a FAFSA improperly identifying herself as a 3rd Year student. Although the Subsidized portion of the award was reduced before disbursement from \$5500 to \$4500, the Unsubsidized portion was not reduced; a careless mistake.

Action Taken: The Office of Student Financial Aid utilizes a Financial Aid Management (FAM) system, PowerFAIDS. The FAM system is hard coded to prevent over awards based on a student's year in school. In addition, procedures begin from the time a student's ISIR is submitted for evaluation to insure that the right students receive the right amount of aid. A number of checks and screen routinely take place throughout the award process to reduce the probability that improper disbursements occur.

The process begins when an ISIR is loaded into PowerFAIDS. Folders are made for each student for that award year and the student's GPA, Credit Hours, Institutional Scholarship and other information is carefully written on the outside of the folder. If there is a discrepancy between the ISIR information and the student's Wesley record corrections are made in PowerFAIDS to prevent an over award. For instance, a student's ISIR "Year-in-School" field identifies the student as a 3rd Year Student, but Wesley's record shows that 56 cr. hrs. were completed making the student a 2<sup>nd</sup> Year student, the applicable fields are updates in PowerFAIDS. When a student is packaged, the loan eligibility limits that are "hard-coded" into the program prevent the student in our example from receiving more than \$4500 in Sub DL and \$6000 in Unsub DL ( with a PLUS Loan denial from the parent). Then, throughout the awarding process, database queries are run for PELL and Direct Loans to make sure awards and ultimately disbursements, match the student's eligibility. Finally, pursuant to FSA HB Volume 4 Chapter 1, a student's enrollment status (credit hours) is checked before disbursements are requested

#### FSA HB Volume 4 Chapter 1

*Before you awarded funds to a student, you confirmed that he or she was an eligible student and was making satisfactory academic progress (See Volume 1, Student Eligibility). However, before disbursing FSA funds, you must determine and document that a student remains eligible to receive them. That is, you must confirm that:*

- *the student is enrolled in classes for the period;*
- *a student enrolled in a non-term program or non-standard term program with terms that are not substantially equal in length has completed the previous period (credits and weeks or clock-hours and weeks of instruction);*
- *if the disbursement occurs on or after the first day of classes, that the student has begun attendance;*

- *for DL loans, the student is enrolled at least half time;*
- *first-time FSA borrowers have completed entrance counseling, received the required disclosures, and completed the first 30 days of their academic program (See Volume 3.);*

## **Electronic Attachments**

1. Program Review Response-Final
2. DOE Review Response Finding #2-Final
3. Finding #3-DL Exit Counseling Handbook-Wesley College
4. Finding #3-Exit Counseling Completed 11-12 and 12-13 AY
5. Finding#3-Crosscheck-Students without exit counseling
6. DOE Review Response Finding #4-Final

## **Hardcopy Enclosures**

1. Finding #2 Spreadsheet
2. Finding #3- Copies of Registered Receipts
3. Finding #3-Loan Exit Counseling Handbook
4. Finding #4
  - A) Student Account Statements for 2011-2012
  - B) 2011-2012 ISIR that Wesley processed Title IV funds
  - C) Revised aid calculation with new EFC identified

Appendix D: The Department's Detailed Analysis - Finding #4

#	Last Name	First Name	SSN	Original EFC	Revised EFC	Original Pell	Recalculated Pell	Difference
1	(b)(6); (b)(7)(C)			476	670	5100	4900	200
2				5135	5373	555	0	555
3				220	277	5300	5300	0
4				219	276	5300	5300	0
5				18029	18379	0	0	0
6				0	0	5550	5550	0
7				1816	1898	3700	3700	0
8				2095	2150	3500	3400	100
9				5684	5878	0	0	0
10				3266	3418	1150	1050	100
11				2052	2148	3500	3400	100
12				4163	4275	1400	1300	100
13				3380	3566	2200	2000	200
14				2164	2246	3400	3300	100
15				0	7	5500	5500	0
16				1580	1662	1950	1950	0
17				200	200	5400	5400	0
18				2781	2945	1400	1300	100
19				4971	5077	600	555	45
20				3665	3761	1900	1800	100
21				2051	2222	1750	1650	100
22				4316	4428	1200	1100	100
23				2057	2148	3500	3400	100
24				2430	2511	3100	3000	100
25				593	675	5000	4900	100
26				0	0	5550	5550	0
27				9225	9355	0	0	0
28				4516	5486	555	0	555
29				3859	4041	1700	1500	200
30				5499	5499	0	0	0
31				1389	1472	2100	2050	50
32				1899	2068	3700	3500	200

Appendix D: The Department's Detailed Analysis - Finding #4

33	(b)(6); (b)(7)(C)	1898	1946	3700	3600	100
34		18660	19010	0	0	0
35		356	399	5200	5200	0
36		1605	1683	1950	1950	0
37		5485	5485	0	0	0
38		967	967	4600	4600	0
39		1326	1408	4200	4100	100
40		2334	2445	3200	3100	100
41		3261	3356	2300	2200	100
42		7007	7178	0	0	0
43		7306	7460	0	0	0
44		0	0	5550	5550	0
45		1217	1298	4300	4300	0
46		1927	2009	3600	3500	100
47		20325	20665	0	0	0
48		0	0	2775	2775	0
49		5905	6153	0	0	0
50		0	0	5550	5550	0
51		2092	3162	2500	2400	100
52		5712	5843	0	0	0
53		16548	11464	0	0	0
54		534	618	5000	4900	100
55		18888	19059	0	0	0
56		96	139	5500	5400	100
57		3654	3745	1900	1800	100
58		1235	1402	4300	4100	200
59		3788	3941	1800	1600	200
60		3718	3900	1800	1700	100
61		10621	8386	0	0	0
62		3374	3579	2200	2000	200
63		2786	2910	2800	2600	200
64		1857	1949	3700	3600	100
65		6086	1126	4500	4400	100
66		2812	2894	2700	2700	0

Appendix D: The Department's Detailed Analysis - Finding #4

67	(b)(6); (b)(7)(C)	7724	7898	0	0	0
68		3311	3404	2200	2100	100
69		3962	4053	1600	1500	100
70		0	63	5500	5500	0
71		268	348	5300	5200	100
72		5014	5125	555	555	0
73		3853	3937	1700	1600	100
74		3890	4036	1700	1500	200
75		1789	1874	3800	3700	100
76		0	0	2775	2775	0
77		21153	21309	0	0	0
78		9435	9784	0	0	0
79		7996	8127	0	0	0
80		4027	4208	1125	975	150
81		3177	3266	2400	2300	100
82		53	134	5500	5400	100
83		4996	5207	600	555	45
84		0	11	2775	2750	25
85		2895	3059	1350	1250	100
86		5093	5322	555	0	555
87	37	79	5500	5500	0	
88	633	686	4900	4900	0	
89	0	0	5550	5550	0	
90	4216	4427	964	802	162	
91	5553	5677	0	0	0	
92	13149	7410	0	0	0	
93	4073	4277	1500	1300	200	
94	0	0	5550	5550	0	
95	4655	4871	900	700	200	
96	2522	2522	1500	1500	0	
97	3302	3448	2200	2100	100	
98	500	541	5100	5000	100	
99	4944	5052	600	555	45	
100	5371	5632	0	0	0	

Appendix D: The Department's Detailed Analysis - Finding #4

101	(b)(6); (b)(7)(C)	0	0	5550	5550	0
102			1510	4200	4000	200
103		934	1016	4600	4500	100
104		16031	16392	0	0	0
105		1277	1441	4300	4100	200
106		3922	4095	1600	1500	100
107		7198	7352	0	0	0
108		28009	28351	0	0	0
109		2127	2208	3400	3300	100
110		2864	2946	1350	1300	50
111		26275	26327	0	0	0
112		564	644	5000	4900	100
113		6447	6745	0	0	0
114		1074	0	2775	2775	0
115		2934	1740	1300	1200	100
116		3929	4020	800	750	50
117		840	922	2350	2300	50
118		0	0	4162	4162	0
119		173	255	5400	5300	100
120		625	665	4900	4900	0
121		9657	9657	0	0	0
122		416	500	5100	5100	0
123		1497	1537	4100	4000	100
124		1402	1562	4100	4000	100
125		1866	1957	3700	3600	100
126		4262	4371	1300	1200	100
127		3986	3740	2000	1800	200
128		1266	1348	2150	2100	50
129		2198	2283	3400	3300	100
130		4630	4738	900	800	100
131		2624	2708	1088	1050	38
132		6706	7014	0	0	0
133		9304	9475	0	0	0
134		4832	5007	700	555	145

Appendix D: The Department's Detailed Analysis - Finding #4

135	(b)(6); (b)(7)(C)	1806	1852	3700	3700	0
136		5506	5632	0	0	0
137		2817	3031	2700	2500	200
138		7274	7361	0	0	0
139		5795	5925	0	0	0
140		3773	3959	1800	1600	200
141		3878	3878	1700	1700	0
142		5969	6140	0	0	0
143		1250	1291	4300	4300	0
144		299	341	5300	5200	100
145		4004	4197	750	700	50
146		2009	1175	1750	1700	50
147		439	519	5100	5000	100
148		2365	2445	3200	3100	100
149		5046	5153	555	555	0
150		1057	1141	4500	4400	100
151		1978	1978	3600	3600	0
152		1924	2004	3600	3500	100
153		2864	2864	2700	2700	0
154		5250	5340	555	0	555
155		0	0	5550	5550	0
156		0	0	5550	5550	0
157		9319	9680	0	0	0
158		2962	3046	2600	2500	100
159		9031	9202	0	0	0
160		0	0	5550	5550	0
161		2734	2510	1400	1400	0
162		5129	5310	555	0	555
163		2101	2186	3400	3400	0
164		4821	4995	700	600	100
165		0	0	5550	5550	0
166		5136	5219	555	555	0
167		0	0	5550	5550	0
168		3077	3251	2500	2300	200

Appendix D: The Department's Detailed Analysis - Finding #4

169	(b)(6); (b)(7)(C)	3745	24087	0	0	0
170		7425	7510	0	0	0
171		3245	3338	2300	2200	100
172		16808	16988	0	0	0
173		14959	14959	0	0	0
174		7585	8311	0	0	0
175		18272	18451	0	0	0
176		1223	1304	4300	4200	100
177		0	0	5550	5550	0
178		0	0	5550	5550	0
179		3842	4034	1700	1500	200
180		1001	1081	4500	4500	0
181		232	394	2650	2600	50
182		7233	7531	0	0	0
183		515	595	5000	5000	0
184		1889	1971	3700	3600	100
185		15681	16042	0	0	0
186		4803	5014	700	555	145
187		0	0	5550	5550	0
188		2446	5078	555	555	0
189		1921	2006	1800	1750	50
190		4565	4662	1000	900	100
191		2737	2819	2800	2700	100
192		1358	1527	4200	4000	200
193		1437	1477	4100	4100	0
194		1403	1443	4100	4100	0
195		20877	21121	0	0	0
196		1467	1507	2050	2000	50
197		0	0	2775	2775	0
198		297	338	5300	5200	100
199		5921	6174	0	0	0
200		2097	2178	3500	3400	100
201		1950	2334	3600	3200	400
202		198	282	5400	5300	100

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203	(b)(6); (b)(7)(C)	1186	1971	3700	3600	100
204		3780	3929	1800	1600	200
205		5181	5304	555	0	555
206		3474	3565	1050	1000	50
207		1856	1856	3700	3700	0
208		6772	566	2550	2500	50
209		2343	2343	3200	3200	0
210		3121	3204	2400	2300	100
211		1889	1985	3700	3600	100
212		0	0	5550	5550	0
213		4129	0	5550	5550	0
214		8185	8410	0	0	0
215		1527	1599	4000	4000	0
216		0	0	2398	2398	0
217		4869	5092	350	278	72
218		922	962	2300	2300	0
219		3611	3684	950	950	0
220		6475	6650	0	0	0
221		0	0	5550	5550	0
222		1243	1286	4300	4300	0
223		1243	1286	4300	4300	0
224		0	0	5550	5550	0
225		0	0	2775	2775	0
226		0	0	2775	2775	0
227		26328	26689	0	0	0
228		0	0	5550	5550	0
229		572	657	5000	4900	100
230		10619	10799	0	0	0
231		5116	5269	555	555	0
232		3842	3935	1700	1600	100
233		3471	3137	1250	1200	50
234		1582	1622	2000	1950	50
235		2954	3117	1300	1200	100
236		1585	1748	4000	3800	200

Appendix D: The Department's Detailed Analysis - Finding #4

237	(b)(6); (b)(7(C))	84	168	5500	5400	100
238		7725	7400	0	0	0
239		564	668	5000	4900	100
240		5014	5208	555	555	0
241		9929	9929	0	0	0
242		3361	3521	2200	2000	200

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

Name of Institution: Wesley College-page 1

No.	Description/Name	Ineligible Disbrsmnt	Program	Disburseme nt Date	Return Paid Date	No. of Days	Imputed CVFR	Federal Share	To ED	To Inst Accounts
1	(b)(6); (b)(7)(C)	\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
2		\$278.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 278.00	\$ 4.94	\$ -
		\$277.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 277.00	\$ 3.98	\$ -
8		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
10		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
11		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
12		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
13		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
14		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
18		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
19		\$22.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 22.00	\$ 0.39	\$ -
		\$23.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 23.00	\$ 0.33	\$ -
20		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
21		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
22		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
23		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
24		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
25		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
28		\$278.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 278.00	\$ 4.94	\$ -
		\$277.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 277.00	\$ 3.98	\$ -
29	\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -	
	\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -	
31	\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -	
32	\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -	
	\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -	

Appendix E: Cost of Funds Worksheet - Finding #4

33	(b)(6); (b)(7)(C)	\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
39		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
40		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
41		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
46		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
51		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
54		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
56		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -

Total Ineligible \$4,005.00

Totals \$ 65.04 \$ -

ACA Liability

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
Pell	\$ 4,005.00	\$ 4,005.00
ACG	\$ -	\$ -
SMART	\$ -	\$ -
TEACH	\$ -	\$ -
FWS	\$ -	\$ -
FSEOG	\$ -	\$ -
Perkins	\$ -	\$ -
FWS-50% Match	\$ -	\$ -
FWS-No Match	\$ -	\$ -
FSEOG-No Match	\$ -	\$ -
Perkins-No Match	\$ -	\$ -

Total Campus-Based \$ - \$ -

Interest Breakdown

Pell Grants	\$ 65.04	\$ -
ACG	\$ -	\$ -
SMART	\$ -	\$ -
TEACH	\$ -	\$ -
FWS	\$ -	\$ -
FSEOG	\$ -	\$ -
Perkins	\$ -	\$ -
FWS-50% Match	\$ -	\$ -
FWS-No Match	\$ -	\$ -
FSEOG-No Match	\$ -	\$ -
Perkins-No Match	\$ -	\$ -

ACA Breakdown

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

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

Name of Institution: Wesley College-page 2

No.	Description/Name	Ineligible Disbrsmnt	Program	Disburseme nt Date	Return Paid Date	No. of Days	Imputed CVFR	Federal Share	To ED	To Inst Accounts
57	(b)(6); (b)(7)(C)	\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
58		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
59		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
60		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
62		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
63		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
64		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
65		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
68		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
69		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
71	\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -	
	\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -	
73	\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -	
	\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -	
74	\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -	
	\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -	
75	\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -	
	\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -	
80	\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -	
	\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -	
81	\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -	
	\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -	
82	\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -	
	\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -	
83	\$22.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 22.00	\$ 0.39	\$ -	

Appendix E: Cost of Funds Worksheet - Finding #4

		\$23.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 23.00	\$ 0.33	\$ -
84	(b)(6); (b)(7)(C)	\$25.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 25.00	\$ 0.44	\$ -
85		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
86		\$278.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 278.00	\$ 4.94	\$ -
		\$277.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 277.00	\$ 3.98	\$ -
90		\$62.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 62.00	\$ 1.10	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
93		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
95		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
97		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
98		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -

Total Ineligible \$3,737.00

Totals  
ACA Liability \$ 60.37 \$ -

**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
Pell	\$ 3,737.00	\$ 3,737.00
ACG	\$ -	\$ -
SMART	\$ -	\$ -
TEACH	\$ -	\$ -
FWS	\$ -	\$ -
FSEOG	\$ -	\$ -
Perkins	\$ -	\$ -
FWS-50% Match	\$ -	\$ -
FWS-No Match	\$ -	\$ -
FSEOG-No Match	\$ -	\$ -
Perkins-No Match	\$ -	\$ -

Total Campus-Based \$ - \$ -

**Interest Breakdown**

Pell Grants	\$ 60.37	\$ -
ACG	\$ -	\$ -
SMART	\$ -	\$ -
TEACH	\$ -	\$ -
FWS	\$ -	\$ -
FSEOG	\$ -	\$ -
Perkins	\$ -	\$ -
FWS-50% Match	\$ -	\$ -
FWS-No Match	\$ -	\$ -
FSEOG-No Match	\$ -	\$ -
Perkins-No Match	\$ -	\$ -

**ACA Breakdown**

FWS	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
FSEOG	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
Perkins	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
FWS-50% Match	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
FWS-No Match	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
FSEOG-No Match	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
Perkins-No Match	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>

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

Name of Institution: Wesley College-page 3

No.	Description/Name	Ineligible Disbrmnt	Program	Disburseme nt Date	Return Paid Date	No. of Days	Imputed CVFR	Federal Share	To ED	To Inst Accounts
99	(b)(6); (b)(7)(C)	\$22.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 22.00	\$ 0.39	\$ -
		\$23.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 23.00	\$ 0.33	\$ -
102		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
103		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
105		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
106		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
109		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
110		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
112		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
115		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
116		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
117		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
119		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
123		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
124		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
125		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
126		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
127		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
128	\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -	
129	\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -	
	\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -	
130	\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -	
	\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -	

Appendix E: Cost of Funds Worksheet - Finding #4

131	(b)(6); (b)(7)(C)	\$38.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 38.00	\$ 0.55	\$ -
134		\$72.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 72.00	\$ 1.28	\$ -
		\$73.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 73.00	\$ 1.05	\$ -
137		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
140		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
144		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
145		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
146		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
147		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
148		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -

Total Ineligible \$3,028.00

Totals  
ACA Liability \$ 49.19 \$ -

**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
Pell	\$ 3,028.00	\$ 3,028.00
ACG	\$ -	\$ -
SMART	\$ -	\$ -
TEACH	\$ -	\$ -
FWS	\$ -	\$ -
FSEOG	\$ -	\$ -
Perkins	\$ -	\$ -
FWS-50% Match	\$ -	\$ -
FWS-No Match	\$ -	\$ -
FSEOG-No Match	\$ -	\$ -
Perkins-No Match	\$ -	\$ -

Total Campus-Based \$ - \$ -

**Interest Breakdown**

Pell Grants	\$ 49.19	\$ -
ACG	\$ -	\$ -
SMART	\$ -	\$ -
TEACH	\$ -	\$ -
FWS	\$ -	\$ -
FSEOG	\$ -	\$ -
Perkins	\$ -	\$ -
FWS-50% Match	\$ -	\$ -
FWS-No Match	\$ -	\$ -
FSEOG-No Match	\$ -	\$ -
Perkins-No Match	\$ -	\$ -

**ACA Breakdown**

FWS	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
FSEOG	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
Perkins	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
FWS-50% Match	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
FWS-No Match	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
FSEOG-No Match	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
Perkins-No Match	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>

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

Name of Institution: Wesley College-page 4

No.	Description/Name	Ineligible Disbrsmnt	Program	Disburseme nt Date	Return Paid Date	No. of Days	Imputed CVFR	Federal Share	To ED	To Inst Accounts
150	(b)(6); (b)(7)(C)	\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
152		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
154		\$278.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 278.00	\$ 4.94	\$ -
		\$277.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 277.00	\$ 3.98	\$ -
158		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
162		\$278.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 278.00	\$ 4.94	\$ -
		\$277.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 277.00	\$ 3.98	\$ -
164		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
168		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
171		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
176		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
179		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
181		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
184		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
186		\$72.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 72.00	\$ 1.28	\$ -
		\$73.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 73.00	\$ 1.05	\$ -
189		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
190		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
191		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
192		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
196		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
198		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -

Appendix E: Cost of Funds Worksheet - Finding #4

200	(b)(6); (b)(7)(C)	\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
201		\$200.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 200.00	\$ 3.55	\$ -
		\$200.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 200.00	\$ 2.88	\$ -
202		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
203		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
		\$50.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 50.00	\$ 0.72	\$ -
204		\$100.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 100.00	\$ 1.78	\$ -
		\$100.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 100.00	\$ 1.44	\$ -
205		\$278.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 278.00	\$ 4.94	\$ -
		\$277.00	Pell Grant	1/23/2012	7/1/2013	525	1.00%	\$ 277.00	\$ 3.98	\$ -
206		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
208		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -
210		\$50.00	Pell Grant	9/22/2011	7/1/2013	648	1.00%	\$ 50.00	\$ 0.89	\$ -

Total Ineligible \$4,610.00

Totals  
ACA Liability \$ 74.67 \$ -

**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
Pell	\$ 4,610.00	\$ 4,610.00
ACG	\$ -	\$ -
SMART	\$ -	\$ -
TEACH	\$ -	\$ -
FWS	\$ -	\$ -
FSEOG	\$ -	\$ -
Perkins	\$ -	\$ -
FWS-50% Match	\$ -	\$ -
FWS-No Match	\$ -	\$ -
FSEOG-No Match	\$ -	\$ -
Perkins-No Match	\$ -	\$ -

Total Campus-Based \$ - \$ -

**Interest Breakdown**

Pell Grants	\$ 74.67	\$ -
ACG	\$ -	\$ -
SMART	\$ -	\$ -
TEACH	\$ -	\$ -
FWS	\$ -	\$ -
FSEOG	\$ -	\$ -
Perkins	\$ -	\$ -
FWS-50% Match	\$ -	\$ -
FWS-No Match	\$ -	\$ -
FSEOG-No Match	\$ -	\$ -
Perkins-No Match	\$ -	\$ -

**ACA Breakdown**

FWS	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
FSEOG	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
Perkins	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
FWS-50% Match	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
FWS-No Match	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
FSEOG-No Match	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>
Perkins-No Match	<span style="border: 1px solid black; display: inline-block; width: 80px; height: 15px;"></span>





**Estimated Loss Formula**

1/8/2014

Enter Institution Name Wesley College

Select Institution Type 4 Yr

	Select Award Year	Enter Ineligible Loan Amount	Enter School CDR	Total Subsidy Costs	Estimated Loss Liability
1	DL 2012-2013	\$ 1,000.00	13.50%	-24.36%	\$ -
2					
3		\$ 1,000.00			\$ -
<b>Description</b>					
4					
5					
6		\$ -			\$ -
<b>Description</b>					
7					
8					
9		\$ -			\$ -
<b>Description</b>					
10					
11					
12		\$ -			\$ -
<b>Description</b>					
<b>Original Ineligible Loan Liability</b>					<b>Total Estimated Loss</b>
					\$ 1,000.00
					\$ -



Wesley College  
 OPE ID: 00143300  
 Appendix F - 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	Sector		Adjusted		Avg		Cons		Cons OS	
CDR	CDR*	Ratio **	DSR ***	DSR ***	DSR ***	OSR ***	Year	Prepay %	Cons DSR ***	Cons OS ***
1	13.50%	7.78%	1.74	1.24%	2.16%	-29.50%	2019	40.2%	3.07%	4.34%
2										
3										
4										
5										
6										
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.