



July 25, 2014

Dr. Phil L. Birdine
President
Western Oklahoma State College
2801 North Main Street
Altus, OK 73521

Certified Mail
Return Receipt Requested
7012 3460 0003 2479 4718

RE: **Final Program Review Determination**
OPE ID: 00314600
PRCN: 201410628478

Dear Dr. Birdine:

The U.S. Department of Education's (Department's) Dallas School Participation Division issued a program review report on February 28, 2014, covering Western Oklahoma State College's (WOSC'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. WOSC's final response was received on April 10, 2014. A copy of the program review report (and related attachments) and WOSC's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by WOSC upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

Purpose:

A final determination has been made concerning the outstanding finding of the program review report. The purpose of this letter is to close the review and notify WOSC of a possible adverse action. Due to the serious nature of the enclosed finding, this FPRD is being referred to the Department's Administrative Actions and Appeals Service Group (AAASG) for its consideration of possible adverse action. Such action may include a fine, or the limitation, suspension or termination of the eligibility of the institution. Such action may also include the revocation of the institution's program participation agreement (if provisional), or, if the institution has an application pending for renewal of its certification, denial of that application. If AAASG initiates any action, a separate notification will be provided which will include information on institutional appeal rights and procedures to file an appeal.

Federal Student Aid

AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

Dallas School Participation Division
1999 Bryan Street, Suite 1410, Dallas, TX 75201-6817
StudentAid.gov

This FPRD contains one or more findings regarding WOSC's failure to comply with the Drug-Free Schools and Communities Act (*DFSCA*) and Part 86 of the Department's General Administrative Regulations. Because this *DFSCA* finding will not result in the assessment of financial liabilities, such a finding may not be appealed. If an adverse administrative action is initiated, additional information about WOSC's appeal rights will be provided under separate cover.

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 Mr. Bruce Anderson at (214) 661-9470.

Sincerely,

(b)(6)

Cynthia Thornton, Director
Dallas School Participation Division

Enclosure:
Final Program Review Determination Report (and appendices)

cc: Myrna Cross, Director of Student Aid/VA
Oklahoma State Regents for Higher Education
North Central Association of Colleges and Schools, Higher Learning Commission

Prepared for
Western Oklahoma State College

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

Final Program Review Determination

July 25, 2014

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A. Institutional Information

Western Oklahoma State College
2001 North Main Street
Altus, OK 73521-1397

Type: Public, 2-year

Highest Level of Offering: Associate's Degree

Accrediting Agency: North Central Association of Colleges and Schools

Current Student Enrollment: 5,035 (2011-12)

% of Students Receiving Title IV: 84% (2011-12)

Title IV Participation School Funding Report: Source G5

2011-2012

Federal Pell Grant Program	\$ 3,048,736.00
William D. Ford Federal Direct Loan Program (Direct Loan)	2,380,494.00
Federal Supplemental Opportunity Grant Program	28,000.00
Federal Work-Study Program	56,567.00

Default Rate FFEL/DL:	2011 16.2%
	2010 20.3%
	2009 17.1%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Western Oklahoma State College (WOSC) from December 16, 2013, to December 19, 2013. The review was conducted by Mr. Bruce Anderson and Ms. Dalinda Lasater.

The focus of the review was to determine WOSC's compliance with the statutes and federal regulations as they pertain to the institution's administration of Title IV programs. The review consisted of, but was not limited to, an examination of WOSC's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files was identified for review from the 2011-2012 and 2012-2013 award years. In addition, a total of 14 additional students were selected based on program specific issues. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. A program review report was issued on February 28, 2014.

Disclaimer:

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

C. Finding and Final Determinations

Finding with Final Determinations

The program review report finding requiring further action is summarized below. At the conclusion of the finding is a summary of WOSC's response to the finding, and the Department's final determination for that finding. A copy of the program review report issued on February 28, 2014, is attached as Appendix A – Program Review Report.

Finding 1. Drug and Alcohol Abuse and Prevention Program Requirements Not Met

Citation Summary: The Drug-Free Schools and Communities Act (*DFSCA*) and Part 86 of the Department's General Administrative Regulations requires each participating institution of higher education (IHE) to certify that it has developed and implemented a drug and alcohol abuse education and prevention program. The program must be designed to prevent the unlawful possession, use, and distribution of drugs and alcohol on campus and at recognized events and activities.

On an annual basis, the IHE must distribute written information about its drug and alcohol abuse prevention program (DAAPP) to all students, faculty, and staff. The distribution plan must make provisions for providing the material to students who enroll at a date after the initial distribution, and for employees who are hired at different times throughout the year.

In addition, each IHE must conduct a biennial review in order to measure the effectiveness of its drug prevention program, and to ensure consistent treatment in the enforcement of its disciplinary sanctions. The IHE must prepare a report of findings and maintain a biennial review report with supporting materials and make them available to the Department and interested parties upon request. *34 C.F.R. §§ 86.3 and 86.100.*

Noncompliance Summary: WOSC's DAAPP did not contain a written description of legal sanctions imposed under local, state, and Federal law for the unlawful possession and distribution of illicit drug and alcohol; nor did it contain a description of the health risks associated with the use of illicit drugs and the abuse of alcohol.

In addition, WOSC failed to conduct a biennial review of the effectiveness of its DAAPP and the consistency of sanctions imposed for violations of its disciplinary standards and codes of conduct. By failing to conduct a biennial review, WOSC also failed to prepare a report of its biennial review findings.

Required Action Summary: WOSC was required to take all necessary corrective actions to resolve these violations and to ensure that they do not recur. This included: a review and revision of its existing drug and alcohol program materials; publishing a materially-complete annual DAAPP disclosure; distribution of the new DAAPP disclosure and providing documentation evidencing the distribution as well as a statement of certification attesting to the fact that the materials were distributed in accordance with the *DFSCA*; conducting a biennial review to measure the effectiveness of its DAAPP and prepare a report of findings; and, establishing policies and procedures to ensure that all subsequent biennial reviews are conducted in a timely manner and are fully documented.

WOSC's Response: WOSC submitted its official response on April 10, 2014. In its response, the College concurred with the finding and described the steps taken to address the deficiencies. WOSC stated that at the conclusion of the Department's site visit, the Dean of Student Support Services initiated a review of the DAAPP. Based on that review, WOSC revised the DAAPP to include the previously-omitted description of legal sanctions and health risks associated with illegal drug use and alcohol abuse. Per the response, the College then published a materially-complete DAAPP disclosure and distributed it to students and employees. In support of its claims, management submitted documentation that indicates that the new DAAPP program information was distributed to enrolled students and current employees. In addition, College officials asserted that a biennial review was conducted and submitted its report and supporting materials. Finally, WOSC submitted new policies and procedures for the annual distribution of the