NOV 29 2019

Scott E. Knapp, PhD.
President
Central Maine Community College
1250 Turner Street
Auburn, ME 04210-6498

Certified Mail Return Receipt Requested
Tracking # 7006 2760 0002 1734 6078

RE: **Final Program Review Determination**
OPE ID: 00527600
PRCN: 201920229984

Dear Dr. Knapp:

The U.S. Department of Education's (Department's) Office of Federal Student Aid issued a program review report on June 28, 2019 covering Central Maine Community College's (CMCC) administration of 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), for the 2017/2018 and 2018/2019 award years. CMCC's final response was received on October 15, 2019. A copy of the program review report (and related attachments) and CMCC's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by CMCC upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

Purpose:

Final determinations have been made concerning all of the outstanding findings of the program review report. The purpose of this letter is to: (1) identify liabilities resulting from the findings of this program review report, (2) provide instructions for payment of liabilities to the Department, (3) notify the institution of its right to appeal, and (4) close the review

Liabilities totaling **$60,120.92** have been repaid by CMCC. The remaining cost of funds liability due the Department from this program review is **$415.14**.

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

Protection of Personally Identifiable Information (PII):

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the 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 and B, Student Sample. In addition, Appendices D through G also contain PII. These appendices were encrypted and sent separately to the institution via e-mail.

Appeal Procedures:

If CMCC elects to appeal to the Secretary of Education for a review of the financial liabilities established by this FPRD, the institution must file a written request for a hearing. Please note that institutions may appeal financial liabilities only. The Department must receive CMCC's request no later than 45 calendar days from the date CMCC receives this FPRD. The Department requests that CMCC submit an original and four copies of its complete request for review. The request must be sent to:

Attn: Susan Crim, Director
Administrative Actions and Appeals Service Group
U.S. Department of Education
Federal Student Aid/Enforcement
830 First Street, NE UCP3, Room 84F2
Washington, DC 20002-8019

CMCC'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; and
(3) include a copy of the FPRD received by the school.

When it submits its request for appeal, the institution may also include documentation it believes the Department should consider in support of the appeal if such documentation is submitted, please provide one copy on an electronic format, preferably as a PDF, such as on a flash drive. Please provide the additional copies in hard copy format.

If any appeal documents include personally identifiable information (PII), the PII must be redacted, except for the student's name and last four digits of his/her social security number (please see the enclosed document, "Protection of Personally Identifiable Information," for instructions on how to mail records containing PII).

If the institution's appeal is timely, the request for appeal will be transmitted to the Department's Office of Hearings and Appeals (OHA), for an administrative hearing in accordance with § 487(b)(2) of the HEA, 20 U.S.C. § 1094(b)(2). The Hearing Official assigned to the case will issue an order scheduling the submission of briefs and supporting evidence in accordance with 34 C.F.R. § 668.114(c). The institution may therefore submit additional documentation supporting its appeal request at that time. Further, if the institution is appealing a projected liability amount, it may provide detailed liability information from a complete file review, either at the time it initially submits it appeal request or pursuant to the proceedings at OHA. The procedures followed with respect to CMCC's appeal are those provided at 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 Lydia Gonzalez at (646) 428-3743. Questions relating to any appeal of the FPRD should be directed to the address noted in the Appeal Procedures section of this letter.

Sincerely,

[redacted]

/Betty Coughlin
Division Director

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

cc: Mr. John Bowie, Financial Aid Administrator
Maine's Community College System Board
New England Commission of Higher Edcuation
Department of Defense
Department of Veterans Affairs
Consumer Financial Protection Bureau

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

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

PII being submitted electronically 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 Win Zip 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 and electronic files containing PII must be:

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

PII data cannot be sent via fax.

Prepared for

Central Maine Community College

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

OPE ID 00527600
PRCN 201920229984

Prepared by
U.S. Department of Education
Federal Student Aid
School Participation Division – New York/ Boston

Final Program Review Determination

NOV 29 2019

Financial Square, 32 Old Slip, 25th Fl., New York, NY 10005
StudentAid.gov.

Table of Contents

A. Institutional Information

Central Maine Community College
1250 Turner Street
Auburn, ME 04210-6498

Type: Public

Highest Level of Offering: Associate Degree

Accrediting Agency: New England Commission of Higher Education

Student Enrollment: 2300 (2018/2019)

Percentage of Students Receiving Title IV: 62% (2018/2019)

Source: School Records

Title IV Participation:

Program	**Award Year 2016/2017**
Federal Pell Grant (Pell)	$ 5,484,348
Federal Supplemental Educational Opportunity Grant (FSEOG)	60,433
Federal Work Study (FWS)	79,750
Federal Direct Loan Stafford Subsidized (DL Sub)	2,810,601
Federal Direct Loan Stafford Unsubsidized (DL Unsub)	3,339,700
PLUS	210,730
Total	**$11,985,562**

Default Rate FFEL/DL:

2016	17.3%
2015	18.7%
2014	18.0%

Default Rate Perkins: No Participation

Source: School Records & U.S. Department of Education

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Central Maine Community College (CMCC) from March 18, 2019 to March 21, 2019. The review was conducted by Lydia Gonzalez and Debra Knight-Brown.

The focus of the review was to determine CMCC's compliance with the statutes and federal regulations as they pertain to the institution's administration of the Federal student aid programs under Title IV of the Higher Education Act of 1965, as amended, U.S.C. §§ 1070 et seq. (Title IV programs). The review consisted of, but was not limited to, an examination of CMCC's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

The Department identified a sample of 30 files for review from the 2017/2018 and 2018/2019 award years. The Department randomly selected the files from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. The Department also selected 2 files to test CMCC's Satisfactory Academic Progress Policy. Appendix A and B lists the names and social security numbers of the students whose files were examined during the program review. A program review report (PRR) was issued on June 28, 2019, which is included as **Appendix C**.

Subsequent to the Department issuing the report, on September 24, 2019, CMCC submitted its written program review response attached as **Appendix D**. After reviewing the report, on October 4, 2019, the Reviewer sent an email requesting additional information related to Findings 5 and 7. CMCC submitted its final response to the program review on October 15, 2019, also included in **Appendix D**.

Disclaimer:

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

C. Final Determinations

Resolved Findings/Findings Without Liabilities

Findings: 2, 3, 4, and 6

CMCC has taken the corrective actions necessary to resolve findings 2, 3, 4, and 6 of the Program Review Report. Therefore, these findings may be considered closed. **Appendix D** contains the institution's written responses related to the resolved finding.

Finding 2. Recordkeeping Inadequate/ COD Data Not Reconciled

In its response, CMCC stated the Office of Financial Aid reviewed all Pell Grant and Direct Loan disbursements made to students during the 2017/2018 and 2018/2019 award years, and identified all students for whom there was a discrepancy between the date of disbursement in COD and the date of disbursement to the students' account. It noted that in most cases the records were one day off, and that it has updated COD to reflect the actual date of disbursement. It further stated that going forward the Office of Financial Aid will report disbursements to COD and disburse those funds on the same day. There are no liabilities associated with this finding. Therefore, this finding has been resolved.

Finding 3. Improper Title IV Disbursement-Professional Judgment

Since CMCC refunded the improper funds disbursed in the amount of $1,319 for award year 2017/2018 for Student 11 during the program review visit, CMCC was only required to inform this office of the procedures it has implemented to ensure no recurrence of this finding. In its response, CMCC stated it has updated its professional judgment policy and trained staff to ensure proper documentation is retained in cases where a professional judgment is performed. CMCC submitted a copy of the updated professional judgment policy. Therefore, this finding has been resolved.

Finding 4. Account Records Inadequate/ Data Not Reconciled

In its response, as required, CMCC made necessary corrections for the students cited in this finding and submitted a revised process. The revised process requires manual input of the expected check run date instead of defaulting to the date that the process to create invoices was run. The run check date will be set out far enough to ensure that it not be late, and no later than 10 days from the date of the financial aid disbursement. This will ensure the created invoice date is the same as the check date. CMCC further stated the revised process was implemented successfully in the summer of 2019 semester. Therefore, no further action is required.

Finding 6. Student Enrollment Status Reporting Untimely/Inaccurate

In its response, CMCC stated the Director of Financial Aid worked with the Director of Institutional Research to identify reasons where changes of status were not being picked up accurately in the enrollment reporting process. SQL (Structured Query Language) scripts have been developed to identify students who are not being accurately reported and will be used going forward as part of the regular submission process. CMCC further stated it has corrected the enrollment status for the students cited in this finding and provided documentation. No further action is required.

Findings With Established Liabilities

The PRR findings requiring further action are summarized below. At the conclusion of each finding is a summary of CMCC's response, if a response was submitted to the finding, and the Department's final determination for that finding. A copy of the PRR issued on June 28, 2019 is attached as **Appendix C**, and correspondence related to the program review responses submitted by CMCC are attached as **Appendix D.**

Finding 1. Incorrect Return of Title IV Calculations

Summary of Noncompliance: When a recipient of Title IV funds withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, it must perform a Return of Title IV Funds calculation to determine the amount of Title IV grant or loan assistance the student earned as of the student's withdrawal date. The calculation should incorporate all of the elements of a refund calculation identified in pertinent Federal regulations, including the identification of proper payment periods, the correct calculation of the number of days completed by the student and the number of days in payment period, and the inclusion of Return calculation of all pertinent Title IV disbursements. 34 C.F.R. §668.22

An institution must return the amount of Title IV funds for which it is responsible under 34 C.F.R. § 668.22(g) as soon as possible but no later than 45 days after the date of the institution's determination that the student withdrew. 34 C.F.R. §668.22(j)(1)

CMCC incorrectly completed the Return of Title IV Calculation (R2T4) for students by including Title IV funds in Step 1 of the calculation as an amount that could have been disbursed for a course the student stopped attending before census date. Upon requesting clarification, it was disclosed that CMCC permitted Title IV disbursements under "funds that could have been disbursed" to students who withdrew or stopped attending the term entirely. Staff members would research those cases to identify courses the students dropped prior to census date. It was also disclosed that students with similar situations who completed the entire term did not receive any Title IV funds that could have been disbursed, which is considered unfair treatment of students as it pertains to Title IV disbursements. In addition, such courses did not appear on the student's academic transcript, and the Registrar was unable to provide documentation to confirm students began the course(s) in question. It was explained that the Registrar does not consider those courses for the purpose of enrollment, and there are no tuition charges for those courses reflected on students' ledger. Reviewers informed CMCC that Title IV disbursement procedures must be consistent in the treatment of all Title IV recipients, and to provide the Department with a corrective action plan. Subsequent to the program review visit, CMCC agreed with the reviewers' finding of "Incorrect Return of Title IV Funds', submitted a correct R2T4 calculation for the students cited, and as required, refunded the funds to the Pell grant program as follows:

<u>Student 7</u>- the student's R2T4 calculation incorrectly indicated a Pell grant amount of $571 in Step 1 of the calculation as an amount that could have been disbursed for a course the student stopped attending before census date during the Spring 2018 term. The course is not reflected on the student's academic transcript, the Registrar was unable to provide proof of attendance, and no tuition charges were reflected on the student's ledger for the course. Subsequent to the program review site visit, CMCC submitted a correct R2T4 calculation for this student, and as required, refunded $736 to the Pell grant program for award year (AY) 2017/2018.

<u>Student 13</u>-similar to student 7, this student's R2T4 calculation for the Summer 2018 term incorrectly indicated a Pell grant amount of $740 that could have been disbursed on Step 1 of the calculation as a result of the student dropping a course prior to census date. The Registrar was unable to provide proof of attendance, and there were no charges reflected on the student's ledger for the course. The R2T4 calculation included a $740 Pell grant payment that could have been disbursed resulting in an incorrect R2T4. Subsequent to the program review visit, CMCC submitted a correct R2T4 calculation for this student, and as required, CMCC refunded $736 to the Pell grant program for AY 2017/2018 for the Summer 2018 term.

<u>Student 14</u>- the student's R2T4 calculation incorrectly included a Pell grant amount of $852 for AY 2017/2018 during the Fall 2017 term as an amount that could have been disbursed in Step 1 of the calculation as a result of the student dropping the courses prior to census date. The Registrar was unable to provide proof of attendance, there were no charges reflected on the student's ledger for the courses, and the courses were not reflected on the student's transcript for the Fall term of 2017. The R2T4 calculation including a $852 Pell grant that could have been disbursed resulted in a disbursement of Pell in the amount of $32.38. Subsequent to the program review visit, CMCC submitted a revised calculation indicating the transaction was reversed and submitted proof the $32.58 improperly disbursed amount was returned to the Pell grant program for AY 2017/2018.

Student 21- the student's R2T4 calculation incorrectly included a Pell grant in the amount of $1524 as an amount that could have been disbursed for the Spring 2019 term. This amount resulted in a $28.96 Pell grant improper disbursement. The Registrar was unable to provide proof of attendance because this student was not considered an enrolled student for the spring 2019 term. Also, the courses were not reflected in the student's academic transcript and there were no charges for those courses. Subsequent to the program review visit, CMCC submitted proof the transaction has been reversed and the $28.96 refunded to the Pell grant program for AY 2018/2019.

Directive from Program Review Report: Due to the systemic nature of this finding (incorrect R2T4 calculation for 4 of 5 withdrawn student who required an R2T4 calculation = 80% error rate), CMCC was required to determine the exact amount of institutional liability associated with this finding. The institution was required to perform a full file review to identify all Title IV recipient students, in the award years 2017/2018 through 2018/2019 that withdrew from or stopped attending the institution for which a return of Title IV calculation was required, whose R2T4 calculation included Title IV funds that might have been disbursed for courses dropped prior to census date.

In addition to these requirements, CMCC was required to devise and implement procedures that will prevent recurrence of this finding.

Analysis of Liability Determination: In its response, CMCC submitted the results of the required full file review report for award years 2017/2018 and 2018/2019. The report identified an additional 114 students whose R2T4 calculations were performed incorrectly based on funds that could have been disbursed prior to census date. Also, in response to this finding, CMCC has implemented procedures by requiring the office of financial aid to update its R2T4 policy to ensure that the census date is taken into consideration and that the calculation is performed correctly. This policy will ensure that Title IV program disbursements are only made for courses the Registrar maintains relevant attendance records and are officially recorded on the student's academic record.

The additional unmade Pell grant refund liability identified during the program review visit for Students 7, 13, and 14 during award year 2017/2018 is **$933.00**, and the additional unmade Pell grant liability identified for award year 2018/2019 for Student 21 is **$32.00.**

Below is a summary of the additional unmade Pell grant refunds disclosed in the file review report by CMCC for award years 2017/2018 and 2018/2019.

Award Year	# of Students	Pell grant
2017/2018	78	$6,498.00
2018/2019	36	$3,807.00
Total		**$10,305.00**

The total Pell grant liability due the Department for this finding is **$11,266.00**, and the Cost of Funds (COF) liability due is **$143.00.** CMCC provided documentation confirming the Pell grant funds totaling **$11,266.00** have been refunded to the Pell grant program. Therefore, the remaining balance for COF due the Department is **$143.00**, included as **Appendix E.**

Repayment instructions are included in Section E of this FPRD.

Finding 5. Unclaimed Student Title IV Credit Balance/ Excess Cash

Summary of Noncompliance: Whenever an institution disburses Title IV program funds by crediting a student's account and the total amount of all Title IV funds credited exceeds that amount of tuition and fees, room and board, and other authorized charges the institution assessed the student, the institution must pay the resulting credit balance directly to the student or parent as soon as possible but no later than 14 days after the balance occurred. 34 C.F.R. §668.164(e)

The institution is reminded that it has a fiduciary responsibility to safeguard Title IV funds; ensure Title IV funds are used only for the purposes intended; act on the student's behalf to repay a student's Title IV education loan debt when the school is unable to pay a credit balance directly to the student, and return to the Department any Title IV funds that cannot be used as intended. 34 C.F.R. §668.164(l)(1)

The Federal Student Aid Handbook's section on Processing Aid and Managing FSA Funds, Volume 4, Chapter 1 states that in the case of unclaimed disbursements, a school must ensure that FSA funds do not escheat to the state or revert to the school or any other party. It further states that a school must have a process through which it identifies a credit balance that remains on a student's account beyond the payment deadline or undelivered to the student and returns those funds to the FSA program on behalf of the student. The search for the student should end and the return to the Department should be completed prior to the date the funds would otherwise escheat, but no later than a few days after a check to the student would cease to be negotiable (usually 180 days).

Also, Dear Colleague Letter GEN 04-03 states that if an institution cannot locate the student (or parent) to whom a Title IV credit balance must be paid, it must return the credit balance to the Title IV programs.

During a routine fiscal staff interview, it was disclosed that CMCC was retaining students' unclaimed Title IV, HEA credit balance checks. A review of the information provided indicates that CMCC retained uncashed student Title IV credit balances past the allowable 240 days. It was explained that this was caused by a recent personnel change in the Business Office. Upon request, CMCC's official provided a list consisting of six (6) uncashed Pell grant credit balance checks totaling $ 1162.39, and one (1) DL Unsub loan credit balance check in the amount of $2,721 from AY 2017/2018.

Directive from Program Review Report: CMCC was required to provide a response to this finding regarding the resolution of these uncashed Title IV credit balance checks. CMCC was also required to inform this office of the procedures it has implemented to ensure no recurrence of this finding.

Analysis of Liability Determination: In its response, CMCC stated it understands that unclaimed Title IV funds must be returned to the Title IV program not later than 240 days after the date of disbursement. The employee responsible for monitoring unclaimed refund checks did not follow a regular schedule to identify issues, which has been corrected. The CMCC's Business Office has implemented a new monthly procedure using SQL script to identify checks that have not been cashed. Attempts will be made to reach the students and give them a deadline of 180 days from the date of check issuance to cash the check or the funds will be returned to the corresponding Title IV program. If the student cannot be reached or does not wish to receive the funds, the funds will be returned to the programs using the COD system (downward adjustments), and the Financial Aid Director will notify the Business Office to return the funds via G5.

Below is a summary of the unclaimed student credit balances disclosed in the file review report by CMCC, including the six checks noted during the program review site visit for award years 2017/2018 and 2018/2019.

Award Year	# of Students	Pell grant	DL Sub	DL Unsub	Total
2017/2018	6	$ 168.69	0	$2,721.00	$ 2,889.69
2018/2019	24	$7,664.35	$307.00	$3,475.88	$11,447.23
Total	**30**	**$7,833.04**	**$307.00**	**$6,196.88**	**$14,336.92**

The total Pell grant liability due the Department for this finding **$7,833.04**, and the interest liability due is **$26.64.** The total DL Sub and Unsub due the Department is **$6,503.88**, and the interest liability is **$34.00**. CMCC provided documentation confirming the Pell grant, DL Sub and DL Unsub funds totaling **$14,336.92** have been returned to the corresponding Title IV programs. Therefore, the remaining balance for imputed interest due the Department is **$60.64**, included as **Appendix F and F1.**

Repayment instructions are included in Section E of this FPRD.

Finding 7. Satisfactory Academic Progress Deficiencies

Summary of Noncompliance: A student is eligible to receive Title IV, HEA program assistance if the student maintains satisfactory academic progress in his or her course of study according to the institution's published standards of satisfactory academic progress that meet the requirements of §668.34. 34 C.F.R. §668.32(f)

An institution that evaluates satisfactory academic progress annually or less frequently than at the end of each payment period and determines that a student is not making progress under its policy may nevertheless disburse Title IV, HEA program funds to the student under the provisions of paragraph (d)(2) or (d)(3) of this section. 34 C.F.R. §668.34(d)

- (d)(2) The institution may place the student on a financial aid probation and may disburse Title IV, HEA program funds to the student for the subsequent payment period, if (i) the institution evaluates the student and determines that the student is not making satisfactory academic progress; (ii) The student appeals the determination; and (iii)(A) the institution determines that the student should be able to make satisfactory academic progress during the subsequent payment period and meet the institution's satisfactory academic progress standards at the end of that payment period; or (B) the institution develops an academic plan for the student that , if followed, will ensure that the student is able to meet the institution's satisfactory academic progress standards by a specific point in time.
- (d)(3) A student on financial aid probation for a payment period may not receive Title IV, HEA program funds for the subsequent payment period unless the student makes satisfactory academic progress or the institution determines that the student met the requirements specified by the institution in the academic plan for the student.

CMCC failed to adhere to the institution's academic policies and procedures disclosed in the student catalog as it pertains to Satisfactory Academic Progress. During the staff interview process, it was disclosed that students are granted unlimited appeals if the student has a valid reason. Based on CMCC's satisfactory academic progress policy, student's academic standing is reported at the end of each term. Students are required to meet 67 percent of attempted credits and meet the following cumulative Grade Point Average (GPA) requirements:

Total hours attempted	Cumulative GPA
1-23	1.5
24-35	1.75
36-47	1.9
48 and above	2.0

- **Per CMCC SAP policy**, a student completing the first semester of the first year must earn a GPA of .70 or higher to avoid automatic suspension.
- Credit hours attempted include all credit hours taken at CMCC, including W, R, I, L, F, and AW. Applicable transfer credits (T) are included in the total attempted, but the credits are not calculated in the GPA.

- **Maximum Time Frame:** All students must complete their program in a period not exceeding 1.5 times the normal length of the program as measure in credit hours attempted. For example, if a program requires successful completion of 60 credits hours, the student may not attempt more than 90 credits (1.5 X 60). In order to graduate, a student must successfully complete 100% of the required courses and obtain a minimum of CGPA of 2.0 within the 1.5 maximum time frame.
- **Academic Warning:** A student is considered on academic warning when they receive a GPA below 2.0 for a semester.
- **Academic Probation:** A student will be placed on probation if the student fails to maintain the cumulative GPA indicated on above table and has a cumulative completion rate less than 67%. A student on academic probation must receive a semester GPA of 2.0 at the end of the next term to avoid being placed on suspension.
- **Academic Suspension:** A student will be placed on suspension if the student either: 1) in the first year, first semester, earns less than .70 GPA. 2) After probationary term the following semester GPA is less than 2.0. 3) After probationary term the cumulative completion rate is below 67%. 4) After probationary term fails to maintain a cumulative GPA as indicated in Table 3 on Page 24 (above mentioned table).
- A student on suspension may request reinstatement after one academic semester. During suspension the student <u>may not take</u> CMCC course work even as a non-matriculated student.
- **Academic Dismissal:** Students faced with academic suspension for a second time are dismissed from CMCC. Students who are dismissed may not take courses at CMCC, even as non-matriculated students.
- **Academic Appeals:** A student may appeal the academic sanction by submitting a letter to the Dean of Academic Affairs no later than two weeks before the first day of classes for the semester following the notification of the sanction. The appeal must also explain why the circumstances no longer exist and what the student will do to ensure that he/she meets satisfactory academic progress in the future. If the appeal is granted, a letter will be emailed to the student that stipulates a contractual intervention strategy that would assist the student in meeting educational standards.

CMCC failed to appropriately evaluate the satisfactory academic progress (SAP) per requirement for the following students:

Student 3

Term	Cumulative # Credits Attempted	Cumulative # of Credits Completed	Cumulative # of Credits Required	SAP 67%	Cum GPA Required	Cum GPA Completed	Cum SAP GPA	Action	Appeal	Decision
Fall 2016	30	18	20	Failed	1.75	1.42	Failed	Probation		
Spring 2017	36	21	24	Failed	1.9	1.8	Failed	Suspended	Appealed	Improperly granted
Fall 2017	42	21	28	Failed	1.9	1.8	Failed	Dismissed		

Student 3's academic transcript shows the student was placed on probation for failing to meet SAP at the end of the Fall 2016 term. The student was suspended at the end of the Spring 2017 term for failing to make SAP. Based on CMCC's SAP policy, a student may request reinstatement after one academic semester. During suspension the student may not take CMCC course work even as a non-matriculated student. However, the student's academic transcript indicates that she attended classes at CMCC the following term (Fall 2017 term), was improperly awarded Title IV funds, and she failed to make SAP again during the Fall 2017 term. As a result, the student is not eligible for the Pell grant disbursed in the amount of $1,480 during AY 2017/2018. Subsequent to the program review visit, CMCC submitted a copy of a letter addressed to the student dated 8/1/2017 informing the student of her eligibility for reinstatement at CCMC for the fall 2017 semester. However, the supporting documentation submitted did not have a copy of the student's appeal request or any other information documenting the basis for the reinstatement.

Based on information obtained during staff interviews, Reviewers expanded the sample to include an additional two students from the list of students who had more than two appeals granted (students 31 and 32). Similar to student 3, the academic records, including appeal documentation for both students 31 and 32 gave indication that CMCC did not follow its SAP policy.

During the onsite program review, CMCC was required to provide a list of students who were granted three or more appeals beginning with AY 2015/2016 through the current AY 2018/2019, and submit copies of students' academic transcripts, related appeal requests, and supporting documentation for the reviewers' evaluation. CMCC provided the list of students which consists of 48 students during the program review visit. Subsequent to the visit, CMCC submitted the corresponding academic transcripts and related appeal requests and approval documentation. The list is included as Appendix B to this report.

The reviewers' SAP evaluation completed for the 48 students listed in Appendix B disclosed deficiencies with adherence to CMCC's policy and the Department's Satisfactory Academic Progress criteria due to the students' failure to meet 1) either the required completed attempted credits (67%), required cumulative GPA, or both, 2) failing subsequent terms after the probation term without an achievable academic plan, 3) due to appeal denials, 4) due to insufficient or inadequate supporting appeal requests and approval documentation, or 5) exceeding 1.5 times the normal length of the program as measured in credit hours completed for Students B1, B2, B3, B4, B5, B6, B10, B12, B15, B16, B18, B19, B20, B21, B24, B25, B27, B29, B30, B33, B34, B35, B39, B41, B44, B46, and B48.

Directive from Program Review Report: Due to the systemic nature of this finding, CMCC was required to determine the exact amount of institutional liability associated with this finding. The institution was required to perform a full file review to identify all

Title IV recipient students, in award years 2015/2016 through 2018/2019, who failed to meet SAP, including the students cited in this finding, who:

- failed to meet the required cumulative GPA, and/or
- failed to complete the required 67% attempted credits;
- did not have proper appeal documentation as required (including student's written appeal request(s) with supporting documentation, and CMCC's appeal approval with an achievable plan, if required);
- exceeded the 1.5 times the normal length of the program, and
- had appeals denied and improperly were awarded Title IV funds.

For each Title IV recipient, CMCC was required to review each term noted in the student's academic transcript to determine if the student maintained satisfactory academic progress in his or her course of study according to the institution's published standards of satisfactory academic progress that meet the Department's requirements of 34 C.F.R §668.34.

CMCC was required to submit the results of the review in spreadsheet format separated by award year identifying the students who were determined not to be making satisfactory academic progress.

CMCC was also required to inform this office of the procedures it has implemented to ensure no recurrence of this finding.

Analysis of Liability Determination:

In its response, CMCC stated it identified 72 Title IV recipients from the fall 2015 through the spring 2019, including the students cited in this finding who were found not to be in compliance with the college's SAP requirements, and the Office of Academic Affairs provided the appeal letters submitted by the students and details of the subsequent academic plans, which were determined on an individual basis based on the student's academic history and circumstances. The academic plans specified the number of credits in which the student could enroll, and in many cases, the specific course(s) the student must take. An academic hold was then placed on the student's account so they could not alter their course schedule themselves.

CMCC stated that in a few instances, students were not required to write an appeal letter due to the quick turnaround of one semester ending and the next semester starting. However, that exceptions were made only for students who had met SAP requirements for the current term but was still not meeting cumulative SAP criteria.

CMCC's review of its SAP policy, and the results of the file review completed regarding students who did not maintain SAP caused CMCC to review the academic forgiveness policy. It stated the current policy does not serve the students well because it causes some students to have to spend multiple semesters making up for previous poor performance, in addition to having to change their major. CMCC further stated that a new policy proposal went before Academic Standard Committee in the fall 2019, which is currently being vetted through the college's governance committee structure.

The Offices of Academic Affairs and Financial Aid reviewed all the files of financial aid recipients from fall 2015 to spring 2019 where the students had been found to not be making SAP, appealed, and were successful in being reinstated. In most cases, the documentation showed that the students filed an appeal, the appeals were granted based on academic plans, and the students who continue received financial aid were successful in adhering to their academic plans, except for four students. Four of the 72 Title IV recipients' appeal documentation were insufficient or not available for retrieval.

The Department accepts CMCC's corrective action submitted for this finding. However, CMCC is advised that it must adhere to the provisions noted under paragraph (d)(2) or (d)(3) of 34 C.F.R. §668.34 as it relates to needed changes to its Satisfactory Academic Policy. The regulatory requirement does not allow for exceptions; professional judgment cannot be used to waive the regulatory requirement for students to file an appeal to continue to be eligible for Title IV funds while on probation status. If the student is not making satisfactory academic progress and is on probation, the student is not eligible for Title IV funds. If the student wishes to apply for Title IV funds, the student is required to submit an appeal to the institution's Academic Department and have that appeal approved.

Below is a summary of the Satisfactory Academic Progress deficiencies file review report completed by CMCC. The file review, which included the students cited in this finding resulted in four students who failed to make satisfactory academic progress for whom Title IV funds were improperly disbursed, without the required appeal documentation.

Award Year	# of Students	Pell grant	DL Sub	DL Unsub	Total
2016/2017	1	$ 1,454.00	$1.750.00	$ 2,786.00	$ 5,990.00
2018/2019	3	$8,090.00	$4,500.00	$14,619.00	$27,209.00
Total	**30**	**$9,544.00**	**$6,250.00**	**$17,405.00**	**$33,199.00**

The total Pell grant liability due the Department for this finding **$9,544.00**, and the COF liability due is **$55.50.** The total DL Sub and Unsub due the Department is **$23,655.00** and the COF liability is **$156.00**. CMCC provided documentation confirming the Pell grant, DL Sub and DL Unsub funds totaling **$33,199.00** has been returned to the corresponding Title IV program. Therefore, the remaining balance for COF due the Department is **$211.50**, included as **Appendices G and G1.**

Repayment instructions are included in Section E of this FPRD.

D. Summary of Liabilities

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

Liabilities	Pell (Closed AY)	Direct Loan (Closed AY)	Cost of Funds	Liabilities already paid	Unpaid Liability
Finding 1	$11,266.00	$0	$143.00	$11,266.00	$143.00
Finding 3	1,319.00	$0	$0	$ 1,319.00	$0
Finding 5	$ 7,833.04	$6,503.88	$ 60.64	$14,336.92	$ 60.64
Finding 7	$ 9,544.00	$23,655.00	$211.50	$33,199.00	$211.50
Total	**$29,962. 04**	**$30,158.88**	**$415.14**	**$60,120.92**	**$415.14**

E. Payment Instructions

1. Liabilities Owed to the Department

Since the total remaining liability amount (**$415.14**) owed to the Department is minimal (less than $1,000), a receivable is not being established with the Department's Accounts Receivable Group. However, CMCC remains responsible, in its role as a fiduciary for Title IV, HEA federal funds, for making restitution to the appropriate accounts in the amounts indicated in the applicable findings and must satisfy all program reporting requirements in making any required adjustments in COD. In addition, CMCC must ensure that it has corrected its procedures so that these types of findings do not recur or are not repeated.

F. Appendices

Appendices A and B, Student Samples, and Appendices D through G may contain personally identifiable information and will be emailed to CMCC as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip files will be sent in a separate email.

Appendix C is attached to this report.

Appendix C
Program Review Report

JUN 2 8 2019

Scott E. Knapp, PhD.
President
Central Maine Community College
1250 Turner Street
Auburn, ME 04210-6498

Certified Mail Return Receipt Requested
Tracking # 7006 2760 0002 1734 5422

RE: **Program Review Report**
OPE ID: 00527600
PRCN: 201920229984

Dear Dr. Knapp:

From March 18, 2019 through March 21, 2019, Lydia Gonzalez and Debra Knight-Brown conducted a review of Central Maine Community College's (CMCC'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 CMCC. The response should include a brief, written narrative for each finding that clearly states CMCC's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, CMCC 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[1] 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.

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

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 CMCC 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 **Lydia Gonzalez** of this office within **90** 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 Appendices A and B, 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 Lydia Gonzalez at (646) 428-3743 or Lydia.Gonzalez@ed.gov

Sincerely,

[redacted]

Christopher Curry
Compliance Manager

cc: Mr. John Bowie, Financial Aid Administrator

Enclosure:
Program Review Report (and appendices)
Protection of Personally Identifiable Information

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

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

PII being submitted electronically 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 Win Zip 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 and electronic files containing PII must be:

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

PII data cannot be sent via fax.

Prepared for

Central Maine Community College

Federal Student Aid
An OFFICE of the U.S. DEPARTMENT of EDUCATION
PROUD SPONSOR of the AMERICAN MIND™

OPE ID 00527600
PRCN 2019202229984

Prepared by
U.S. Department of Education
Federal Student Aid
School Participation Division-New York/Boston

Program Review Report

June 28, 2019

Table of Contents

A. Institutional Information

Central Maine Community College
1250 Turner Street
Auburn, ME 04210-6498

Type: Public

Highest Level of Offering: Associate's Degree

Accrediting Agency: New England Commission of Higher Education

Current Student Enrollment: 2300 (2018/2019)

Percentage of Students Receiving Title IV: 62% (2018/2019)

Source: School Records

Title IV Participation:

Program	**Award Year 2016/2017**
Federal Pell Grant (Pell)	$ 5,484,348
Federal Supplemental Educational Opportunity Grant (FSEOG)	60,433
Federal Work Study (FWS)	79,750
Federal Direct Loan Stafford Subsidized (DL Sub)	2,810,601
Federal Direct Loan Stafford Unsubsidized (DL Unsub)	3,339,700
PLUS	210,730
Total	**$11,985,562**

Default Rate FFEL/DL:	2015	18.7%
	2014	18.0%
	2013	17.2%

Default Rate Perkins: No Participation

Source: School Records & U.S. Department of Education

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Central Maine Community College (CMCC) from March 18, 2019 to March 21, 2019. The review was conducted by Lydia Gonzalez and Debra Knight-Brown.

The focus of the review was to determine CMCC's compliance with the statutes and federal regulations as they pertain to the institution's administration of the Federal student aid programs under Title IV of the Higher Education Act of 1965, as amended, U.S.C. §§ 1070 et seq. (Title IV programs). The review consisted of, but was not limited to, an examination of CMCC's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

The Department identified a sample of 30 files for review from the 2017/2018 and 2018/2019 award years (through 3/21/2019). The Department randomly selected the files from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. The Department also selected 2 files to test CMCC's Satisfactory Academic Progress Policy. 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 CMCC'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 CMCC 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 CMCC to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding 1. Incorrect Return of Title IV Calculations

Noncompliance: When a recipient of Title IV funds withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, it must perform a Return of Title IV Funds calculation to determine the amount of Title IV grant or loan assistance the student earned as of the student's withdrawal date. The calculation should incorporate all of the elements of a refund calculation identified in pertinent Federal regulations, including the identification of proper payment periods, the correct calculation of the number of days completed by the student and the number of days in payment period, and the inclusion of Return calculation of all pertinent Title IV disbursements. 34 C.F.R. §668.22

An institution must return the amount of Title IV funds for which it is responsible under 34 C.F.R. § 668.22(g) as soon as possible but no later than 45 days after the date of the institution's determination that the student withdrew. 34 C.F.R. §668.22(j)(1)

CMCC incorrectly completed the Return of Title IV Calculation (R2T4) for students by including Title IV funds in Step 1 of the calculation as an amount that could have been disbursed for a course the student stopped attending before census date. Upon requesting clarification, it was disclosed that CMCC permitted Title IV disbursements under "funds that could have been disbursed" to students who withdrew or stopped attending the term entirely. Staff members would research those cases to identify courses the students dropped prior to census date. It was also disclosed that students with similar situations who completed the entire term did not receive any Title IV funds that could have been disbursed, which is considered unfair treatment of students as it pertains to Title IV disbursements. In addition, such courses did not appear on the student's academic transcript, and the Registrar was unable to provide documentation to confirm students began the course(s) in question. It was explained that the Registrar does not consider those courses for the purpose of enrollment, and there are no tuition charges for those courses reflected on students' ledger. Reviewers informed CMCC that Title IV disbursement procedures must be consistent in the treatment of all Title IV recipients, and to provide the Department with a corrective action plan. Subsequent to the program review visit, CMCC agreed with the reviewers' finding of "Incorrect Return of Title IV Funds', submitted a correct R2T4 calculation for the students cited, and as required, refunded the funds to the Pell grant program as follows:

<u>Student 7</u>- the student's R2T4 calculation incorrectly indicated a Pell grant amount of $571 in Step 1 of the calculation as an amount that could have been disbursed for a course the student stopped attending before census date during the Spring 2018 term. The course is not reflected on the student's academic transcript, and Registrar was unable to provide proof of attendance, and no tuition charges reflected on the student's ledger for the course. Subsequent to the program review site visit, CMCC submitted a correct R2T4 calculation for this student, and as required, refunded $736 to the Pell grant program for award year (AY) 2017/2018.

Student 13-similar to student 7, this student's R2T4 calculation for the Summer 2018 term incorrectly indicated a Pell grant amount of $740 that could have been disbursed on Step 1 of the calculation as a result of the student dropping a course prior to census date. The Registrar was unable to provide proof of attendance, and there were no charges reflected on the student's ledger for the course. The R2T4 calculation which included a $740 Pell grant payment that could have been disbursed resulted in an incorrect R2T4. Subsequent to the program review visit, CMCC submitted a correct R2T4 calculation for this student, and as required, CMCC refunded $736 to the Pell grant program for AY 2017/2018 for the Summer 2018 term.

Student 14- the student's R2T4 calculation incorrectly indicated a Pell grant amount of $852 for AY 2017/2018 during the Fall 2017 term as an amount that could have been disbursed in Step 1 of the calculation as a result of the student dropping the courses prior to census date. The Registrar was unable to provide proof of attendance, there were no charges reflected on the student's ledger for the courses, and the courses were not reflected on the student's transcript for the Fall term of 2017. The R2T4 calculation using $852 Pell grant that could have been disbursed resulted in a disbursement of Pell in the amount of $32.38. Subsequent to the program review visit, CMCC submitted a revised calculation indicating the transaction was reversed and submitted proof the $32.58 improperly disbursed was returned to the Pell grant program for AY 2017/2018.

Student 21- the student's R2T4 calculation incorrectly indicated a Pell grant in the amount of $1524 during the Spring 2019 term, an amount listed in Step 1 as an amount that could have been disbursed. This amount resulted in a $28.96 Pell grant improper disbursement because the student dropped her courses prior to census date. The Registrar was unable to provide proof of attendance because this student was not considered an enrolled student for the spring 2019 term. Also, the courses were not reflected in the student's academic transcript and there were no charges for those courses. Subsequent to the program review visit, CMCC submitted proof the transaction has been reversed and the $28.96 refunded to the Pell grant program for AY 2018/2019.

Required Action: Due to the systemic nature of this finding (incorrect R2T4 calculation for 4 of 5 withdrawn student who required an R2T4 calculation = 80% error rate), CMCC must determine the exact amount of institutional liability associated with this finding. The institution is required to perform a full **file review** to identify all Title IV recipient students, in the award years **2017/2018 through 2018/2019** that withdrew from or stopped attending the institution for which a return of Title IV calculation was required, whose R2T4 calculation included Title IV funds that might have been disbursed for courses dropped prior to census date.

For these students, the institution must provide the results to this office in spreadsheet format with the following information, by corresponding award year:

1. Student's Name
2. Social Security Number
3. Last date of attendance, if any
4. Date of Determination
5. Amount of Incorrect Title IV refunded, if any, by program, by award year
6. Date Returned to Title IV Program(s)
7. Number of Days Late, if any
8. Additional unmade refund as a result of incorrect calculation or failure to complete an R2T4 calculation, if any, by program, by award year

In addition to these requirements, CMCC must devise and implement procedures that will prevent recurrence of this finding. A copy of those procedures must accompany the institution's response.

Instructions for the repayment of liabilities arising from this finding will be provided in the final program review determination letter.

Finding 2. Recordkeeping Inadequate/ COD Data Reported Not Reconciled

Noncompliance: The Secretary considers an institution to have administrative capability if the institution administers the Title IV, HEA program in accordance with all statutory provisions of or applicable to Title IV of the HEA, all applicable regulatory provisions prescribed under that statutory authority, and all applicable special arrangements, agreements, and limitation entered into under the authority of statutes applicable to Title IV of the HEA; has provided all program reporting required for compliance to the Secretary in a timely manner. 34 C.F.R. §668.16 (i)

Federal Register/ Vol 78, No. 40 published 2/28/2013 indicates that for disbursements that occur prior to 4/1/13 an institution is required to submit disbursement information to the Common Origination & Disbursement System (COD) no later than 30 calendar days after the institution makes a disbursement or becomes aware of the need to make an adjustment to previously reported disbursement data; or for disbursements that occur on or after 4/1/13 an institution is required to submit disbursement information no later than 15 calendar days after the institution makes a disbursement or becomes aware of the need to make an adjustment to previously reported disbursement data.

Program Reviewers noted many instances in which CMCC failed to accurately report Title IV disbursement dates to COD. For example, Student 1- the student's Spring 2018 term Pell grant in the amount of $1,480 for AY 2017/2018 was disbursed on 2/5/18 per COD. However, the student's ledger indicates that the funds were credited to the student's account on 2/6/18. CMCC was required to update COD data to match the actual dates that the funds were disbursed to the student. For the purpose of disbursement dates reporting to COD, the date that the institution credits the student's account is the date of disbursement.

Similar instances were noted related to the same disbursement date during the Spring 2018 term for Student 4.

Student 8- the student's Summer 2018 term Pell grant in the amount of $1,480 was disbursed on 7/10/18 per COD. However, the student's ledger indicates the funds were disbursed on 7/12/18.

Student 16- during the Spring 2019 term, the student's Pell grant, Subsidized and Unsubsidized loans were disbursed on 2/18/19, per COD. However, the student's ledger shows the funds were disbursed on 2/19/19.

Similar instances related to COD disbursement on 2/18/19, and student ledger conflicting disbursement date on 2/19/19 were noted for Students 17, 18, 19, 20, 22, 23, 24, 25, 26, 29, and 30.

Student 20- this student also had DL Subsidized and Unsubsidized loans in the amount of $866, and $1,476 disbursed on 3/13/19 per COD. However, the student's ledger shows the funds were disbursed on 3/14/19.

Similar instances related to DL COD disbursement/student ledger conflicting dates were noted for Students 27.

Required Action: Under normal circumstances, posting Title IV funds late to a student account would generally indicate excess cash. However, CMCC does not draw the Title IV funds until it establishes the student meets eligibility for the funds. Posting of Title IV funds to the student's account must be consistent with the disbursement date noted in COD. CMCC is required to review the Title IV funds drawn during award years 2017/2018 and 2018/2019 to ensure that the disbursement dates reported to COD match the actual dates that the funds were disbursed to the students, per students' ledgers, including the students cited in this finding. The institution will be apprised of any action or additional requirements after the review of its response.

CMCC must also inform this office of the procedures it has implemented to ensure no recurrence of this finding.

Finding 3. Improper Title IV Disbursement- Professional Judgment

Noncompliance: Institutions are required to comply with all statutory and regulatory provisions applicable to the Title IV programs. These provisions include disbursing Pell grant funds only after determining that a student is eligible for the disbursement. 34 C.F.R. §§668.31 & 668.32

CMCC made an improper Pell grant payment to Student 11 during AY 2017/2018 in the amount of $1,319. CMCC failed to secure supporting documentation to confirm the special circumstances that applied to this student. The student did not submit a copy of her divorce decree, and loss of income, as requested by CMCC. During the program review visit, school officials unsuccessfully tried to reach the student, who was no longer enrolled, to obtain the documentation. As a result, CMCC decided to refund the improper Pell payment to the Pell grant program in the amount of $1,319 for AY 2017/2018.

Required Action: Based on the immediate corrective action taken by CMCC, no further action is required for this student. However, CMCC is required to inform this office of the procedures it has implemented to ensure no recurrence of this finding.

Finding 4. Account Records Inadequate/Data Not Reconciled

Noncompliance: By entering into a program participation agreement, an institution agrees that it will establish and maintain such administrative and fiscal procedures and records as may be necessary to ensure proper and efficient administration of funds received from the Secretary or from students under the Title IV, HEA programs. 34 C.F.R. §668.14

An institution shall establish and maintain on a current basis financial records that reflect each HEA, Title IV program transaction. 34 C.F.R. §668.24(b)(2)(i)

CMCC failed to maintain accurate data records on student ledgers for the following students:

Student 1- the student's ledger for the Fall 2017 term shows a Federal Pell grant credit balance posted 9/18/17 in the amount of $2,220. It also shows a refund check entry in the amount of $6,072 ("A/R refund check") posted on 9/25/17. However, the actual check was dated 9/29/17. For the Spring 2018 term, the student's ledger shows a Pell grant credit balance posted on 2/6/18 in the amount of $1,480. It also shows a refund check entry in the amount of $5,347 posted on 2/8/18. However, the actual check was dated 2/12/18. The transactions on the student's ledger appear to indicate the date the refund process was initiated instead of the date the funds were made available to the student. This does not constitute an accurate audit trail of the transactions. The posted transactions should either reflect the actual date the funds were made available to the student, or the transaction description should more accurately identify the actual activity.

Similar instances were noted with Students 2, 4, 5, 9, 10, 11, 12, and 13.

Student 8- the student's ledger indicates that a Pell grant in the amount of $1,480 was disbursed during the Fall 2017 term on 10/6/17, and a refund in the amount of $1,304.77 was created on 10/12/17. However, the refund check was dated 10/13/17.

Student 16- the student's ledger shows a Pell grant disbursement posted to the student's ledger on 9/19/18, and a refund in the amount of $4,098.57 was created on 9/19/18. However, the refund check is dated 9/24/18. The student's ledger also shows a Pell grant disbursement posted on 2/19/19. A refund in the amount of $3,903.56 was created on 2/19/19. However, the refund check is dated 2/21/19.

Similar instances related to credit balance refund posting dates on student's ledger versus actual check date were noted for Students 18, 21, 24, 25, 26, and 29.

Required Action: CMCC is required to make the necessary corrections for the students cited in this finding. The institution must provide documentation to indicate that the required changes have been made.

Also, the institution is required to have procedures in place to ensure that students ledger reflect accurate data. Details of those procedures must be provided with the response to this report. The institution will be apprised if any further action is required.

Finding 5. Unclaimed Student Title IV Credit Balance/ Excess Cash

Noncompliance: Whenever an institution disburses Title IV program funds by crediting a student's account and the total amount of all Title IV funds credited exceeds that amount of tuition and fees, room and board, and other authorized charges the institution assessed the student, the institution must pay the resulting credit balance directly to the student or parent as soon as possible but no later than 14 days after the balance occurred. 34 C.F.R. §668.164(e)

The institution is reminded that it has a fiduciary responsibility to safeguard Title IV funds; ensure Title IV funds are used only for the purposes intended; act on the student's behalf to repay a student's Title IV education loan debt when the school is unable to pay a credit balance directly to the student, and return to the Department any Title IV funds that cannot be used as intended.

The Federal Student Aid Handbook's section on Processing Aid and Managing FSA Funds, Volume 4, Chapter 1 states that in the case of unclaimed disbursements, a school must ensure that FSA funds do not escheat to the state or revert to the school or any other party. It further states that a school must have a process through which it identifies a credit balance that remains on a student's account beyond the payment deadline or undelivered to the student, and returns those funds to the FSA program on behalf of the student. The search for the student should end and the return to the Department should be completed prior to the date the funds would otherwise escheat, but no later than a few days after a check to the student would cease to be negotiable (usually 180 days).

Also, Dear Colleague Letter GEN 04-03 states that if an institution cannot locate the student (or parent) to whom a Title IV credit balance must be paid, it must return the credit balance to the Title IV programs.

During a routine fiscal staff interview, it was disclosed that CMCC was retaining students' unclaimed Title IV, HEA credit balance checks. A review of the information provided indicates that CMCC retained uncashed student Title IV credit balances past the allowable 240 days. It was explained that this was caused by a recent personnel change in the business office. Upon request, CMCC's official provided a list consisting of six (6) uncashed Pell grant credit balance checks totaling $ 1162.39, and one (1) DL Unsub loan credit balance check in the amount of $2,721 from AY 2017/2018.

Required Action: CMCC must provide a response to this finding regarding the resolution of these uncashed Title IV credit balance checks. CMCC must also inform this office of the procedures it has implemented to ensure no recurrence of this finding.

Repayment instructions for liabilities will be included in the FPRD.

Finding 6. Student Enrollment Status Reporting Untimely/Inaccurate

Noncompliance: A school shall, unless it expects to submit its next student enrollment report to the Secretary within the next 60 days; notify the Secretary within 30 days if it discovers that a Direct Subsidized, Direct Unsubsidized, or Direct Plus Loan has been made to or on behalf of student who enrolled at that school but has ceased to be enrolled on at least a half-time basis. 34 C.F.R. §685.309 (b)(2)(i)

CMCC failed to accurately report students' enrollment status in a timely manner for the following students:

<u>Student 3</u>- the student's academic records indicate a last date of attendance of 11/3/17. However, CMCC inaccurately reported to NSLDS on 1/4/18 the student as withdrawn with an effective date of 8/28/17.

<u>Student 7</u>- the student's withdrawal date was inaccurately reported to NSLDS as 1/22/18, reported on 6/14/18. The student's academic attendance records, and R2T4 calculation worksheet indicate a withdrawal date of 3/20/18, with a 5/6/18 date of determination (DOD).

<u>Student 11</u>- the student's withdrawal date was inaccurately reported to NSLDS as 10/18/17, reported on 1/4/18. The student's academic records and R2T4 calculation worksheet indicate a withdrawal date and DOD of 10/21/18.

<u>Student 14</u>- the student's withdrawal date was inaccurately reported to NSLDS as 8/31/17. The student's academic transcript indicates the student was last enrolled during the Spring 2017 term.

<u>Student 21</u>- NSLDS indicates the student withdrawal date as 1/23/19. However, based on the academic records provided during the program review visit, the student dropped the Spring 2019 term courses prior to census date. Therefore, based on CMCC's procedures, the student was not an official enrollment for the Spring 2019, and the correct withdrawal date should be 12/7/18, per Fall 2018 withdrawal records.

Student 28- the student's withdrawal date of 8/30/18 is incorrectly listed in NSLDS because the student completed the Fall 2018 term. Subsequent to the program review site visit, CMCC corrected the student's status as attending half-time during the Fall 2018 term. However, CMCC is also required to update the student's withdrawal status in NSLDS because based on the information provided, the student failed to return to CMCC during the Spring 2019 term.

Required Action: There are no liabilities associated with this finding. However, based on the high instances of student's enrollment status reporting discrepancies for withdrawn students, CMCC must review, and make appropriate status corrections, if necessary, for students who withdrew or stopped attending the institution during AY 2017/2018 and 2018/2019, including students cited in this finding.

Also, the institution is required to have procedures in place to ensure that student enrollment reports reflect accurate data and that students' change of status are reported in a timely manner. Details of those procedures must be provided with the response to this report.

Finding 7. Satisfactory Academic Progress Deficiencies

Noncompliance: A student is eligible to receive Title IV, HEA program assistance if the student maintains satisfactory academic progress in his or her course of study according to the institution's published standards of satisfactory academic progress that meet the requirements of §668.34. 34 C.F.R. §668.32(f)

An institution that evaluates satisfactory academic progress annually or less frequently than at the end of each payment period and determines that a student is not making progress under its policy may nevertheless disburse Title IV, HEA program funds to the student under the provisions of paragraph (d)(2) or (d)(3) of this section. 34 C.F.R. §668.34(d)

- (d)(2) The institution may place the student on a financial aid probation and may disburse Title IV, HEA program funds to the student for the subsequent payment period, if (i) the institution evaluates the student and determines that the student is not making satisfactory academic progress; (ii) The student appeals the determination; and (iii)(A) The institution determines that the student should be able to make satisfactory academic progress during the subsequent payment period and meet the institution's satisfactory academic progress standards at the end of that payment period; or (B) The institution develops an academic plan for the student that , if followed, will ensure that the student is able to meet the institution's satisfactory academic progress standards by a specific point in time.
- (d)(3) A student on financial aid probation for a payment period may not receive Title IV, HEA program funds for the subsequent payment period unless the student makes satisfactory academic progress or the institution determines that the student met the requirements specified by the institution in the academic plan for the student.

CMCC failed to adhere to the institution's academic policies and procedures disclosed in the student's catalog as it pertains to Satisfactory Academic Progress. During the staff interview process, it was disclosed that students are granted unlimited appeals as long as the student has a valid reason. Based on CMCC's satisfactory academic progress policy, student's academic standing is reported at the end of each term. Students are required to meet 67 percent of attempted credits and meet the following cumulative Grade Point Average (GPA) requirements:

Total hours attempted	Cumulative GPA
1-23	1.5
24-35	1.75
36-47	1.9
48 and above	2.0

- **Per CMCC SAP policy**, a student completing the first semester of the first year must earn a GPA of .70 or higher to avoid automatic suspension.
- Credit hours attempted include all credit hours taken at CMCC, including W, R, I, L, F, and AW. Applicable transfer credits (T) are included in the total attempted, but the credits are not calculated in the GPA.
- **Maximum Time Frame:** All students must complete their program in a period not exceeding 1.5 times the normal length of the program as measure in credit hours attempted. For example, if a program requires successful completion of 60 credits hours, the student may not attempt more than 90 credits (1.5 X 60). In order to graduate, a student must successfully complete 100% of the required courses and obtain a minimum of CGPA of 2.0 within the 1.5 maximum time frame.
- **Academic Warning:** A student is considered on academic warning when they receive a GPA below 2.0 for a semester.
- **Academic Probation:** A student will be placed on probation if the student fails to maintain the cumulative GPA indicated on above table, and has a cumulative completion rate less than 67%. A student on academic probation must receive a semester GPA of 2.0 at the end of the next term to avoid being placed on suspension.
- **Academic Suspension:** A student will be placed on suspension if the student either: 1) in the first year, first semester, earns less than .70 GPA. 2) After probationary term the following semester GPA is less than 2.0. 3) After probationary term the cumulative completion rate is below 67%. 4) After probationary term fails to maintain a cumulative GPA as indicated in Table 3 on Page 24 (above mentioned table).
- A student on suspension may request reinstatement after one academic semester. During suspension the student <u>may not take</u> CMCC course work even as a non-matriculated student.
- **Academic Dismissal:** Students faced with academic suspension for a second time are dismissed from CMCC. Students who are dismissed may not take courses at CMCC, even as non-matriculated students.
- **Academic Appeals:** A student may appeal the academic sanction by submitting a letter to the Dean of Academic Affairs no later than two weeks before the first day of classes

for the semester following the notification of the sanction. The appeal must also explain why the circumstances no longer exist and what the student will do to ensure that he/she meets satisfactory academic progress in the future. If the appeal is granted, a letter will be emailed to the student that stipulates a contractual intervention strategy that would assist the student in meeting educational standards.

CMCC failed to appropriately evaluate the satisfactory academic progress (SAP) per requirement for the following students:

Student 3

Term	Cumulative # Credits Attempted	Cumulative # of Credits Completed	Cumulative # of Credits Required	SAP 67%	Cum GPA Required	Cum GPA Completed	Cum SAP GPA	Action	Appeal	Decision
Fall 2016	30	18	20	Failed	1.75	1.42	Failed	Probation		
Spring 2017	36	21	24	Failed	1.9	1.8	Failed	Suspended	Appealed	Improperly granted
Fall 2017	42	21	28	Failed	1.9	18	Failed	Dismissed		

The student's academic transcript shows the student was placed on probation for failing to meet SAP at the end of the Fall 2016 term. The student was suspended at the end of the Spring 2017 term for failing to make SAP. Based on CMCC's SAP policy, a student may request reinstatement after one academic semester. During suspension the student may not take CMCC course work even as a non-matriculated student. However, the student's academic transcript indicates that she attended classes at CMCC the following term (Fall 2017 term), was improperly awarded Title IV funds, and she failed to make SAP again during the Fall 2017 term. As a result, the student is not eligible for the Pell grant disbursed in the amount of $1,480 during AY 2017/2018. Subsequent to the program review visit, CMCC submitted a copy of a letter addressed to the student dated 8/1/2017 informing the student of her eligibility for reinstatement at CCMC for the fall 2017 semester. However, the supporting documentation submitted did not have a copy of the student's appeal request or any other information documenting the basis for the reinstatement.

Based on information obtained during staff interviews, Reviewers expanded the sample to include an additional two students from the list of students who had more than two appeals granted (students 31 and 32).

Student 31

Term	Cumulative # of Credits Attempted	Cumulative # of Credits completed	Cumulative # of Credits Required	Cum SAP 67%	Cum GPA Required	Cum GPA Completed	Cum SAP GPA	Action	Appeal	Decision
Fall 2015	19	10	12	Failed	1.5	.50	Failed	Suspension	Appealed	Appeal Improperly granted

Spring 2016	32	16	21	Failed	1.75	1.24	Failed	Dismissed	Appealed	Appeal Improperly granted
Spring 2017	45	26	30	Failed	1.9	1.8	Failed	Suspension	Appealed	Appeal improperly granted
Summer 2017	49	30	32	Failed	2.0	2.0	Passed	Suspension	Appealed	Improperly granted
Fall 2017	63	40	42	Failed	2.0	1.8	Failed	Suspension	Appealed	Improperly granted
Winter 2017	66	43	44	Failed	2.0	1.8	Failed	Suspension	Appealed	Improperly granted
Spring 2018	80	51	53	Failed	2.0	1.8	Failed	Suspension	Appealed	Improperly granted

A review of Student 31's academic transcript and appeal documentation gives indication that CMCC did not follow its SAP policy. It failed to determine the student should be able to make SAP during subsequent payment period and meet the institution's satisfactory academic progress standards by a specific point in time. An evaluation of this student's academic transcript indicates failure to meet SAP for seven (7) consecutive semesters. The student was suspended the very first semester he attended for not meeting the required GPA (.70) and completion of 12 credits during the fall 2015 semester. Based on CMCC's SAP policy, the student was required to stay out the subsequent semester (spring 2016). However, the student attended classes, and was improperly awarded Title IV funds. CMCC did not submit copies of the student's appeal or CMCC's appeal approval to justify authorizing the student to enroll for the Spring 2016 term. As a result, the student is not eligible for Title IV during the Spring 2016 term.

The student was dismissed at the end of Spring 2016 term for failing to complete the required attempted credits, and GPA. However, contrary to the SAP policy, the student was permitted to enroll for the Spring 2017, and improperly disbursed Title IV funds. Based on the supporting documentation submitted by CMCC, the student was improperly granted an appeal approval for reinstatement to the Spring 2017 term. However, CMCC did not provide a copy of the student's appeal request letter or supporting documentation. The student failed to meet the required completed credits, cumulative GPA, and was suspended again. Based on CMCC's SAP policy, the student was required to stay out until the Spring 2018 term. Instead, the student was permitted to enroll, and was improperly awarded Title IV funds during the Summer and Fall 2017 terms, during which he failed to make SAP for both terms, as he failed to meet the required 67% credit completion requirement. The student submitted an appeal in December 2017, and was accepted to the winter 2017 term, but once again failed to meet the cumulative attempted credits and cumulative GPA.

Since CMCC SAP policy requires students' SAP review at the end of every term, in order to disburse Title IV funds to a student after the probation term, if not making SAP, CMCC is required to have an achievable academic plan for the student, beginning with addressing the issues preventing the student from meeting SAP. However, CMCC's records did not contain an academic plan for this student.

The total ineligible Title IV improperly disbursed during AY 2015/2016 is $2,887.50 Pell 2015/2016, 1,732.00 DL Sub, and 990.00 DL Unsub. Also, the total ineligible Title IV funds improperly disbursed during AY 2017/2018 2018 semesters is Pell $7,400, DL Unsub $5,442, PLUS $4,634, and FSEOG $2,317.00.

Student 32

Term	# Credits Attempted	# of Credits Completed	# of Credits Required	SAP 67%	Cum GPA Required	Cum GPA Completed	SAP Cum GPA	Action	Appeal	Decision
Fall 2015	13	0	8	Failed	1.5	0	Failed	Suspension	Appeal	Appeal-improperly granted
Spring 2017	20	7	13	Failed	1.5	1.98	Passed	Suspension	Appeal	Appeal - improperly granted
Summer 2017	26	13	17	Failed	1.75	1.72	Failed	Suspension	Appeal	Appeal improperly granted
Fall 2017	32	19	21	Failed	1.75	2.3	Passed	Suspension	Appeal	Appeal improperly granted
Spring 2018	44	28	29	Failed	2.0	2.3	Passed	Suspension	Appeal	Appeal-improperly granted

The academic transcript shows the student failed to meet .70 GPA during the first term in the Fall 2015 term. A letter of reinstatement was sent to the student for the Spring 2017 term. However, CMCC did not provide a copy of the student's appeal for reinstatement. Therefore, the student is not eligible for Title IV during the Spring 2017 term. The student repeated some courses during the Spring 2017 term but failed to complete the cumulative 67% attempted number of credits after completing the term. Since the student was suspended again for not meeting SAP, CMCC was required to have an academic plan in place in order to disburse subsequent Title IV funds to this student.

Due to the systemic nature of this finding, CMCC was required to provide a list of students who were granted three or more appeals beginning with AY 2015/2016 through the current AY 2018/2019, and submit copies of students' academic transcripts, related appeal requests and supporting documentation for the reviewers' evaluation. CMCC provided the list of students which consists of 48 students during the program review visit. Subsequent to the visit, CMCC submitted the corresponding academic transcripts and related appeal requests and approval documentation. The list is included as Appendix B to this report.

The reviewers' SAP evaluation completed for the 48 students listed in Appendix B disclosed deficiencies with adherence to CMCC's policy and the Department's Satisfactory Academic Progress criteria due to the student's failure to meet 1) either the required completed attempted credits (67%), required cumulative GPA, or both, 2) failing subsequent terms after the probation term without an achievable academic plan, 3) due to appeal denials, 4) due to insufficient or inadequate supporting appeal requests and approval documentation 5) exceeding 1.5 times the normal length of the program as measured in credit hours completed for Students B1, B2, B3,

B4, B5, B6, B10, B12, B15, B16, B18, B19, B20, B21, B24, B25, B27, B29, B30, B33, B34, B35, B39, B41, B44, B46, and B48.

Additional examples are as follows:

Student B1- Similar to Student 31, this student failed to meet the required cumulative GPA and completed attempted credits during the Fall 2015 term. The student was placed on probation. The student also failed to meet SAP during the spring 2016 semester and was placed on suspension. CMCC submitted a copy of an appeal request from the student dated 1/6/17. However, based on the documentation submitted, there is no record of an appeal request response or copies of an academic plan provided to the student. The student then failed to meet SAP for eight (8) consecutive terms by either failing both the required GPA and completed attempted credits or not completing the required attempted credits. As a result, the student was not eligible for Pell grant during AY 2016/2017 in the amount of $4,361, and AY 2017/2018 $7,400.

Student B2- the student's academic transcript indicates the student was placed on probation at the end of Fall 2015 term for failing to meet the required completed attempted credits. The student was suspended at the end of Spring 2016 term for failing to meet SAP again. The appeal documentation provided by CMCC indicates the student's appeals dated December 28, 2016, August 22, 2017 and May 22, 2018 were all denied. However, the student was permitted to enroll and receive Title IV funds. Based on this information this student is not eligible for Title IV funds improperly disbursed during award years 2016/2017 through 2018/2019. Title IV funds disbursed for these periods are as follows: Pell 2016/2017 $2,181, Pell 2017/2018 $734, and Pell 2018/2019 $6,095.

Student B25- the student's academic transcript indicates failure to complete the Business Administration and Management program by exceeding 1.5 times the normal length of the program as measured in credit hours attempted as of the end of the Spring 2018 term. The student had attempted 115 credits and completed 73 credits at the end of the Spring 2018 term. His program requires 61 credits with 91.5 attempted credits as his maximum time frame to complete the program (1.5 X 61). In order to graduate, a student must successfully complete 100% of the required courses and obtain a minimum of CGPA within the 1.5 maximum time frame. The student submitted an appeal request on 12/24/2018. However, the documentation submitted did not include a response to the student. In addition, the student failed to meet SAP by not meeting the required 67% completed attempted credits (quantitative measure) beginning with the Summer 2016 term. CMCC did not provide any appeal requests supporting documentation, appeal approval documentation, or achievable academic plans for this student. Therefore, this student is not eligible for Title IV funds beginning with the Spring 2017 term through current AY 2018/2019.

Required Action: Due to the systemic nature of this finding, CMCC is required to determine the exact amount of institutional liability associated with this finding. The institution is required to perform a full file review to identify all Title IV recipient students, in award years 2015/2016 through 2018/2019, who failed to meet SAP, including the students cited in this finding, who:

- failed to meet the required cumulative GPA, and/or
- failed to complete the required 67% attempted credits;
- did not have proper appeal documentation as required (including student's written appeal request(s) with supporting documentation, and CMCC's appeal approval with an achievable plan, if required);
- exceeded the 1.5 times the normal length of the program, and
- had appeals denied and improperly were awarded Title IV funds.

For each Title IV recipient, CMCC must review each term noted in the student's academic transcript to determine if the student maintained satisfactory academic progress in his or her course of study according to the institution's published standards of satisfactory academic progress that meet the Department's requirements of 34 C.F.R §668.34.

The result of CMCC's review must be submitted to this office in spreadsheet format separated by award year identifying the following information for students who were determined not to be making satisfactory academic progress per requirement as follows:

1. Student name;
2. Student social security number;
3. Semester (s)
4. Amount of ineligible Title IV Funds Due the Department, by award year, and Title IV Program

This information must be provided to this office within ninety (90) days of receipt of this letter to the address below.

U.S. Department of Education
Federal Student Aid
Financial Square
32 Old Slip, 25th Fl.
New York, NY 10005
Attention: Lydia Gonzalez

Copies of the documentation used to determine the liability for this finding, including but not limited to student's academic transcripts, appeal requests, appeal approvals, statement of account, student's budget, award letter, ISIR, transcript, and other supporting documentation, should be retained by the school for possible further review by the Department.

CMCC must also inform this office of the procedures it has implemented to ensure no recurrence of this finding.

Instructions for repayment of liabilities will be provided in the Final Program Review Determination letter (FPRD).

D. Appendices A and B

Appendix A (Student Sample) and B (SAP Students List) contains personally identifiable information and will be emailed to CMCC as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The Department will send the password needed to open the encrypted WinZip file(s) in a separate email.