



January 28, 2020

Dr. Rachel M. Desmarais, President  
Vance – Granville Community College  
200 Community College Road  
Henderson, NC 27536-0917

UPS Tracking# 1ZA87964NY91121198

**RE: Final Program Review Determination**  
OPE ID: 00990300  
PRCN: 201930430032

Dear Dr. Desmarais:

The U.S. Department of Education's (Department's) Office of Federal Student Aid issued a program review report on September 11, 2019 covering Vance – Granville Community College's (VGCC) 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 2007-08 & 2008-09 award years. The institution's final response was received on October 17, 2019. A copy of the program review report (and related attachments) and VGCC's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by VGCC upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

**Purpose:**

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

The total liabilities due from the institution from this program review are \$93,132.18.

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

finding in the attached report does not contain any student PII. Instead, the finding references students only by a student number created by Federal Student Aid. The student sample is listed in Appendix A, Student Sample.

The Department issued its Program Review Report (PRR) on September 11, 2019 - Appendix B. VGCC submitted its written response to the PRR on October 17, 2019 – Appendix C. These appendices were encrypted and sent separately to the institution via e-mail.

### **Appeal Procedures:**

If VGCC 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 VGCC's request no later than 45 calendar days from the date VGCC receives this FPRD. The Department requests that VGCC 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

VGCC'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

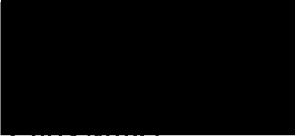
34 C.F.R. § 668.114(c). The institution may therefore submit additional documentation supporting its appeal request at that time. Further, if the institution is appealing a projected liability amount, it may provide detailed liability information from a complete file review, either at the time it initially submits its appeal request or pursuant to the proceedings at OHA. The procedures followed with respect to VGCC'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 Damon McMillon at (404) 974-9310. Questions relating to any appeal of the FPRD should be directed to the address noted in the Appeal Procedures section of this letter.

Sincerely,



Chris Miller  
Division Director

Enclosure:

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

cc: Kali Brown, Dean, Student Success and Support (Former Financial Aid Director)  
Southern Association of Colleges and Schools Commission on Colleges (SACSCOC)  
NC Community College System (NCCS)

Prepared for

**Vance - Granville Community College**

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

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**OPE ID 00990300  
PRCN 201930430032**

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

# **Final Program Review Determination January 28, 2020**

**School Participation Division – Atlanta  
61 Forsyth Street Room 18T40  
Atlanta, Georgia 30303-8918  
[www.FederalStudentAid.gov](http://www.FederalStudentAid.gov)**

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**A. Institutional Information**

Vance – Granville Community College  
200 Community College Road  
Henderson, NC 27536-0917

Type: Public

Highest Level of Offering: Associate degree

Accrediting Agency: Southern Association of Colleges and Schools Commission on Colleges (SACSCOC)

Current Student Enrollment: 3,063 (2019)

% of Students Receiving Title IV: 73% (2018)

Title IV Participation: Postsecondary Education Participation System (PEPS)

	<u>2018-2019</u>
Federal PELL Grant (PELL)	\$3,984,253.00
Federal Supplemental Educational Opportunity Grant (FSEOG)	\$88,165.00
Federal Work Study Program (FWS)	\$60,535.00

Default Rates FFEL/DL:	2016 – 12.7%
	2015 – 15.5%
	2014 – 28.9%

## **B. Scope of Review**

The U.S. Department of Education (the Department) Office of Federal Student Aid conducted an offsite program review for Vance - Granville Community College (VGCC) from June 17, 2019 to June 21, 2019. The review was conducted by Damon McMillon at the office of the Atlanta School Participation Division.

The focus of the review was to determine VGCC's compliance with specific regulation(s) 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 was focused on an examination of VGCC's compliance with an institution choosing to receive Title IV, HEA program funds prior to approval from both the accreditor and state authorizing agency and/or notification to the Department, the institution is liable for all title IV, HEA program funds it disbursed to students enrolled at that ineligible location, program or branch. 34 C.F.R. § 600.20(b)(5).

VGCC self-reported the VGCC – Masonic Home for Children location as an unreported additional location, offering more than 50% of at least one (1) educational program prior to Accreditor approval. The Department reviewed the SACSCOC approval for the VGCC- Masonic Home for Children location. As a result, the Department requested, identified and reviewed VGCC – Masonic Home for Children location's Title IV, HEA program fund disbursements made during the unapproved 2007-2008 and 2008-2009 award years. Appendix A identifies the students who were examined during the program review.

The Department issued its Program Review Report (PRR) on September 11, 2019, Appendix B. VGCC responded to the PRR with supporting documentation on October 17, 2019, included in Appendix C.

### **Disclaimer:**

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

### **C. Final Determinations**

The program review report finding with liabilities requiring further action are summarized below. At the conclusion of the finding is a summary of VGCC's response to the finding, and the Department's final determination for that finding. A copy of the program review report issued on September 11, 2019 is attached as Appendix B.

#### **Finding 1. Title IV Received at Ineligible Branch/Location**

**Summary of Noncompliance:** An institution is responsible for ensuring that approval from both the accreditor and state authorizing agency are received prior to enrolling students and operating as an extension of the main campus when expanding operations to any new locations, programs or branches. Expansion without proper approval and/or notification does not qualify as eligible under the terms of a Program Participation Agreement. Consequently, an institution receiving Title IV, HEA program funds prior to said approval and/or notification deems the institution as liable for all title IV, HEA funds it disbursed to students enrolled in the ineligible location, program or branch. See 34 C.F.R. § 600.20(b)(5).

During VGCC's most recent Recertification, in October of 2016, the institution self-reported the previously unreported Vance - Granville Community College - Masonic Home for Children location, and that it has been operating since the 2007-2008 award year and received title IV, HEA funds that were disbursed to enrolled students. Additionally, it confirmed that accreditor approval was not received until March of 2009.

**Directives from PRR:** VGCC confirmed the operational start date and the initial acceptance date of title IV for the Vance - Granville Community College - Masonic Home for Children location. The institution also provided a spreadsheet by award year for all title IV, HEA funds disbursed at the ineligible Vance - Granville Community College - Masonic Home for Children location for both the 2007 – 2008 & 2008-2009 award years.

#### **Analysis of Liability Determination:**

VGCCs responded with a letter from President, Dr. Rachel M. Desmarais, dated October 15, 2019 acknowledging the following: The institution self-reported the previously undisclosed location, Vance - Granville Community College - Masonic Home for Children, and that said location has been offering more than 50% of an educational program since August 17, 2007. VGCC also confirmed disbursing Title IV and HEA program funds for both the Pell Grant and Federal SEOG programs for students enrolled at the ineligible location prior to receiving accreditor approval. During this period, VGCC was not participating in the Direct Loan Program. VGCC provided SACSCOC Accreditor approval documentation for the Vance - Granville Community College - Masonic Home for Children location effective March 12, 2009. VGCC was unable to



provide the chain of events causing their failure in obtaining prior SACSCOC approval because the college administrators that were responsible are no longer employees or affiliates of VGCC.

Per the direction of the Program Review Report (PRR), VGCC provided a list of all students that were enrolled students and received Title IV, HEA program fund disbursements of both Pell Grant and FSEOG prior to being an eligible at the VGCC – Masonic Home for Children location during the 2007-2008 and 2008-2009 award years with disbursement dates and amounts. The confirmation of not having approval until March 12, 2009 from SACSCOC their Accreditor. Based on this provided information, VGCC is liable for any ineligible disbursements made to students attending the ineligible location prior to the March 12, 2009 approval.

	2007-2008	2008-2009 (FALL ONLY)
FEDERAL SEOG	\$400.00	\$600.00
PELL GRANT	\$43,461.46	\$24,920.03

As identified in its response (see Appendix C3), VGCC must return \$68,381.49 in Pell Grant funds to the Department for payments that it improperly disbursed to students enrolled in at the ineligible location. In addition, VGCC is liable for the interest, or cost of funds (COF) associated with the over payment of Pell Grant funds. The interest was calculated by using the date of disbursement to the date of the issuance of the PRR. The total COF for Pell Grant amount due to the Department for this finding is \$23,448.54. The COF calculation is included as Appendix D1.

VGCC's response also indicated that the total amount of Federal SEOG funds improperly disbursed to students for this finding is \$1,000.00. VGCC is liable for the interest, or cost of funds (COF) associated with the over payment of Federal SEOG funds. The interest was calculated by using the date of disbursement to the date of the issuance of the PRR. The total COF amount due for FSEOG to the Department for this finding is \$302.15. The COF calculation is included as Appendix D1.

### D. Summary of Liabilities

The total amount calculated as liabilities from the finding in the program review determination is as follows. The payment instructions in Section E have been adjusted to reflect the unduplicated liabilities.

Liabilities	Pell (Closed Award Years)	FSEOG	
Finding 1 (2007-08 Award Year)	\$43,461.46	\$400.00	
Finding 1 (2008-09 Award Year)	\$24,920.03	\$600.00	
<b>Subtotal 1</b>	<b>\$68,381.49</b>	<b>\$1,000.00</b>	
Interest/SA (2007-08 Award Year)	\$17,451.48	\$157.76	
Interest/SA (2008-09 Award Year)	\$5,997.06	\$144.39	
<b>Subtotal 2</b>	<b>\$23,448.54</b>	<b>\$302.15</b>	
<b>TOTAL</b>	<b>\$91,830.03</b>	<b>\$1,302.15</b>	
<b>Payable To:</b>			<b>Totals</b>
Department	\$91,830.03	\$1,302.15	<b>\$93,132.18</b>

### ***E. Payment Instructions***

#### **1. Liabilities Owed to the Department**

VGCC owes to the Department \$93,132.18. This liability must be paid using an electronic transfer of funds through the Treasury Financial Communications System, which is known as FEDWIRE. VGCC must make this transfer within **45 days of the date of this letter**. This repayment through FEDWIRE is made via the Federal Reserve Bank in New York. If VGCC's bank does not maintain an account at the Federal Reserve Bank, it must use the services of a correspondent bank when making the payments through FEDWIRE.

Any liability of \$100,000 or more identified through a program review must be repaid to the Department via FEDWIRE. The Department is unable to accept any other method of payment in satisfaction of these liabilities.

Instructions for completing the electronic fund transfer message format are included on the attached FEDWIRE form.

### **Terms of Payment**

As a result of this final determination, the Department has created a receivable for this liability and payment must be received by the Department within **45 days of the date of this letter**. If payment is not received within the 45-day period, interest will accrue in monthly increments from the date of this determination, on the amounts owed to the Department, at the current value of funds rate in effect as established by the Treasury Department, until the date of receipt of the payment. VGCC is also responsible for repaying any interest that accrues. If you have any questions regarding interest accruals or payment credits, contact the Department's Accounts Receivables & Bank Management Group at (202) 245-8080 and ask to speak to VGCC's account representative.

If full payment cannot be made within **45 days** of the date of this letter, contact the Centralized Receivables Service (CRS) at 1-855-549-2683 to apply for a payment plan. Interest charges and other conditions apply.

If within 45 days of the date of this letter, VGCC has neither made payment in accordance with these instructions nor entered into an arrangement to repay the liability under terms satisfactory to the Department, the Department intends to collect the amount due and payable by administrative offset against payments due VGCC from the Federal Government. **VGCC may object to the collection by offset only by challenging the existence or amount of the debt.** To challenge the debt, VGCC must **timely appeal** this

determination under the procedures described in the "Appeal Procedures" section of the cover letter. The Department will use those procedures to consider any objection to offset. **No separate appeal opportunity will be provided.** If a timely appeal is filed, the Department will defer offset until completion of the appeal, unless the Department determines that offset is necessary as provided at 34 C.F.R. § 30.28. This debt may also be referred to the Department of the Treasury for further action as authorized by the Debt Collection Improvement Act of 1996.

#### **4. Liabilities Owed to the Department in the case of Title IV Grants**

##### **PELL Grant – Cancelled Award Year**

Finding(s): #1

Appendices: Appendix C

VGCC must repay:

Pell ACG SMART or TEACH Cancelled Award Year			
Amount (Principal)	Amount (Interest)	Title IV Grant	Award Year
\$43,461.46	\$17,451.48	PELL Grant	2007-2008
\$24,920.03	\$5,997.06	PELL Grant	2008-2009
Total Principal	Total Interest		
\$68,381.49	\$23,448.54		

The liability above is for award years 5 years or older and student adjustments in the Common Origination and Disbursement (COD) system are no longer possible. Instead, the funds will be returned to the general program fund for the applicable Title IV program.

##### **FSEOG Funds – Cancelled Award Year**

Finding(s): #1

Appendices: Appendix C

VGCC must repay:

FSEOG Cancelled Award Year			
Amount (Principal)	Amount (Interest)	Title IV Grant	Award Year
\$400.00	\$157.76	FSEOG	2007-2008
\$600.00	\$144.39	FSEOG	2008-2009

Total Principal	Total Interest		
\$1,000.00	\$302.15		

The SEOG liability above is for award years 5 years or older and adjustments in the Fiscal Operations Report and Application to Participate (FISAP) system are no longer possible. Instead, the funds will be returned to the general program fund for the applicable Title IV program.

#### **F. Appendices**

Appendix A – Student Sample, Appendix B – Program Review Report (PRR), Appendix C – Location Specific Student Disbursement Records (2007-08 and 2008-09 award years) and Appendix D – Finding 1: Student Listing all contain personally identifiable information and will be emailed to VGCC as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file(s) will be sent in a separate email.

Appendices C1, C2, C3, D1 and E are attached to this report.

Final Program Review Determination  
PRCN #: 201930430032

Appendix B  
Program Review Report

Prepared for

**Vance - Granville Community College**

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

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**OPE ID 00990300**

**PRCN 201930430032**

**Prepared by Damon McMillon**

**U.S. Department of Education**

**Federal Student Aid**

**School Participation Division - Atlanta**

# **Program Review Report**

**September 11, 2019**

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

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**A. Institutional Information**

Vance – Granville Community College  
200 Community College Road  
Henderson, NC 27536-0917

Type: Public

Highest Level of Offering: Associate degree

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

Current Student Enrollment: 3,801 (2018)

% of Students Receiving Title IV: 34% (2018)

Title IV Participation: Postsecondary Education Participation System (PEPS)

	<u>2017-2018</u>
Federal PELL Grant (PELL)	\$4,276,390.00
Federal Supplemental Educational Opportunity Grant (FSEOG)	\$59,200.00
Federal Work Study Program (FWS)	\$74,241.00

Default Rates FFEL/DL:	2015 – 15.5%
	2014 – 28.9%
	2013 – 23.8%

## **B. Scope of Review**

The U.S. Department of Education (the Department) conducted an offsite program review for Vance - Granville Community College (VGCC) from June 17, 2019 to June 21, 2019. The review was conducted by Damon McMillon at the office of the Atlanta School Participation Division.

The focus of the review was to determine VGCC's compliance with the statutes and federal regulations as they pertain to the institution's administration of Title IV programs. This review is the result of a self-reported ineligible additional location and is for identifying any potential associated liabilities.

### **Disclaimer:**

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning VGCC'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 VGCC of its obligation to comply with all 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, an area of noncompliance was noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by VGCC to bring operations of the financial aid programs into compliance with the statutes and regulations.

#### **Finding #1: Ineligible Branch/Location**

##### **Noncompliance:**

When an institution expands operations by adding new locations, programs, or branches it is responsible for ensuring that approval from both the accreditor and state authorizing agency are received prior to enrolling students and operating as an extension of the main campus. Expanded operation without all proper approval and/or notification to the Department does not qualify as eligible under the terms of a Program Participation Agreement. Therefore, if an institution chooses to receive Title IV, HEA program funds prior to approval from both the accreditor and state authorizing agency and/or notification of to the Department, the institution is liable for all title IV, HEA program funds it disbursed to students enrolled at that ineligible location, program or branch. See 34 C.F.R. § 600.20(b)(5).

During VGCC's most recent Recertification process, VGCC added a previously unreported location, Vance - Granville Community College - Masonic Home for Children, to their Eligibility and Certification Approval Report (ECAR). Additionally, VGCC self-reported that the undisclosed location has been operating since the 2007-08 award year and that accreditor approval for said location was not received until March of 2009. As part of the program review, the reviewer discovered that VGCC improperly received Title IV, HEA funds in the name of students attending the ineligible location: Vance - Granville Community College - Masonic Home for Children, 600 College Street, Oxford, NC 27565. The Department considers VGCC's failure to receive proper accreditor approval for an additional operating campus prior to receiving Title IV, HEA funds during the 2007-08 and 2008-09 award years, to be a serious violation. According to the information provided by VGCC, the following Title IV, HEA funds were received during the 2007-08 and 2008-09 award years:

Award Year	2007-2008	2008-2009
Title IV (Pell Grant)	\$43,461.00	\$65,370.00

##### **Required Action:**

VGCC must confirm the official operational start date and the initial acceptance date of Title IV for the *Vance - Granville Community College - Masonic Home for Children* location. The institution must also provide a spreadsheet by award year for all Title IV, HEA funds disbursed at the ineligible *Vance - Granville Community College - Masonic Home for Children* location for

both the 2007-2008 & 2008-2009 award years. The following information for each student must be provided:

- first and last name
- last four digits of the student's social security number
- disbursement date and amount of each Title IV disbursement, by Title IV program (PELL, DL, FSEOG), and award year

*Please submit the results of your review electronically. Return the file to Damon McMillon by email at [Damon.McMillon@ed.gov](mailto:Damon.McMillon@ed.gov). VGCC must submit the data file in a .zip file encrypted with VGCC encryption.*

Any Title IV, HEA funds that VGCC received at the unreported *Vance - Granville Community College - Masonic Home for Children* location are liabilities that must be repaid to the Department. See 34 C.F.R. § 600.21(e). The Department will provide payment instructions and any additional instructions to VGCC in a subsequent Final Program Review Determination (FPRD) letter.

## **D. Enclosures**

### **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.**

**Accounting Document – Prior Year Monetary Recovery (AD-PYMR)****Institution:** Vance-Granville Community College**City, State:** Henderson, NC**PRCN:** 201930430032

560937968

**TIN:****DUNS:** 075572248**Reviewer:** Damon McMillon**Region:** Atlanta**Date:** 01/16/2019**Section A - Use if no adjustments are being made in COD**

Programs	Type	Amount	Funding Code	Object Class
Federal Pell Grant (Cancelled AY)	Principal	\$68,381.49	3220RNOYR	69017
	Interest	\$23,448.54	1435RNOYR	64020

TEACH	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020

ACG	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020

National SMART	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020

FSEOG (No FISAP Corrections)	Principal	\$1,000.00	3220RNOYR	69017
	Interest	\$302.15	1435RNOYR	64020

FWS (No FISAP Corrections)	Principal		3220RNOYR	69017
	Interest		1435RNOYR	64020

Direct Loan and Direct Loan EAL	Principal		4253XNOYR	53020 or 53010
	Interest		4253XNOYR	53040

FFEL and FFEL EAL	Interest/SA/EAL		4251XNOYR	53020
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Federal Perkins	Principal		2915RNOYR	53054
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**Section B: Use if the Institution is instructed to make adjustments in COD**

Add rows if necessary			Amount			G5 Program Award # *
Pell, ACG, SMART, TEACH	Program / Award Year	Principal		3875FNOYR	69020	
	Program / Award Year	Imputed Interest		1435RNOYR	64020	
Direct Loan (do not use for estimated loss)	Award Year	Principal		3875FNOYR	69020	
	Award Year	Imputed Interest		4253XNOYR	53040	

**Comments:**

\* G5 Award # (P063P104306, first 5 digits = program, next 2 digits = award year, next 4 digits = code unique to school). Note: It is important that the year in the G5 award number correspond to the award year for which any adjustments are being made, or for which the balance has been incurred (in the case of an unsubstantiated cash or negative cash balance). If the reviewer is unsure after looking in G5, contact Tracy Lardinois, for Pell or DL, or Tremia Haythe for FWS or FSEOG.

**Example of G5 award numbers for a single school for the 2009-2010 award year, Pell vs. DL:**

Pell is designated by "P063P" and DL is designated by "P268K"

P063P091445 (Pell 2009-2010 award - Pell uses the final two digits of the leading award year in the award number)

P268K101445 (Direct Loan 2009-2010 award - DL uses the final two digits of the trailing award year in the award number)

**Example of G5 award number for FWS and FSEOG**

FWS is designated by "P033A" and FSEOG is designated by "P007A"

P033A092121 (FWS 2009-2010 award - FWS uses the final two digits of the leading award year in the award number)

P007A092121 (FSEOG 2009-2010 award - FSEOG uses the final two digits of the leading award year in the award number)

Program	G5 Award Number	Program Designation	Award Year (YY)	Unique School ID assigned by G5 (####)	Example Award # for 2013-2014
Direct Loan	P268KYY####	P268K	Trailing Year (DL uses the final two digits of the trailing award year.)	Uses school's GAPS ID	P268K141445
TEACH	P379TYYY####	P379T	Trailing Year (TEACH uses the final two digits of the trailing award year.)	Uses school's GAPS ID	P379T141445
Pell	P063PYYY####	P063P	Leading Year (Pell uses the final two digits of the leading award year.)	Uses school's GAPS ID	P063P131445
IASG	P408AYYY####	P408A	Leading Year (IASG uses the final two digits of the leading award year.)	Uses school's GAPS ID	P408AYY1445
FWS	P033AYYY####	P033A	Leading Year (FWS uses the final two digits of the leading award year.)	Last four digits of Campus Based Number found in PEPS via OPE ID Crosswalk	P033A132121
FSEOG	P007AYYY####	P007A	Leading Year (FSEOG uses the final two digits of the leading award year.)	Last four digits of Campus Based Number found in PEPS via OPE ID Crosswalk	P007A132121

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