

## Coastline College Financial Aid Program Review

Findings from 11/10/2015 Program Review Report	Final Program Review Determination 2/26/2019
<p><b>#1 Distance Education Violations, i.e. Correspondence above 50% federal threshold.</b></p> <ul style="list-style-type: none"> <li>a. <b>Failure to support and maintain regular and substantive interaction between the students and the instructor in its online platform.</b></li> <li>b. <b>Failure to accurately determine the attendance at academically-related activities.</b></li> <li>c. <b>Did not have processes in place through which the school establishes that the student who registered in a distance education course.</b></li> </ul>	<p><b>The Department concluded that CCC meets Distance Education (DE) requirements. The Department reviewed CCC's revised DE policy and procedures and determined that they were adequate.</b> However, CCC should strictly follow and enforce DE definition, 34 CFR §600.2, and document RSI.</p> <p>Recommendations listed on pp. 8-9 in the Final Program Review Report</p>
<p><b>#2 Crime Awareness Requirements Not Met – Failure to disclose in its 2014 Annual Security Report (ASR) all the necessary policy statements and statistical data required by federal law.</b></p>	<p>Violation sustained.</p> <p>CCC violated multiple provisions of the Clery Act. Specifically the College failed to disclose in its 2014 ASR, all necessary policy statements and statistical data required by law. The items omitted are listed on pp. 13.</p> <p>Moreover, CCC failed to appropriately categorize the crime clarification for burglary in the Catalog (pp. 14)</p> <p>The review team's analysis also indicated that the identified violations were, for the most part, adequately addressed by the final versions of the College's 2015 and 2016 ASRs and its new and revised internal policies and procedures. <b>As such, the Department has determined that CCC's remedial action plan meets minimum requirements and for these reasons, has accepted the response and considers this finding to be closed for purposes of this program review.</b></p>

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	Violations of the Clery Act that, by their nature, cannot be cured. There is no way to truly "correct" violations of this type once they occur. Remedial actions cannot and do not diminish the seriousness of these violations, nor do they eliminate the possibility that the Department will impose an adverse administrative action and/or require additional corrective actions as a result. (pp.16)
<b>#3 Drug and Alcohol Abuse Prevention Program (DAAPP) Requirements Not Met – Failure to develop and implement a comprehensive DAAPP and distribute an accurate and complete DAAPP disclosure to all students enrolled in the program, faculty, and staff.</b>	<p>CCC violated multiple provisions of the DFSCA and Department’s Part 86 regulations.</p> <p>Specifically, CCC failed to develop and implement a comprehensive DAAPP in 2014 and distribute an accurate and complete DAAPP disclosure to all students, faculty and staff enrolled in the program in 2014. In addition, the institution failed to conduct a complete biennial review and prepare a report of findings as required by the DFSCA.</p> <p><b>The Department has determined that the College's remedial action plan meets minimum requirements. For these reasons, the Department has accepted CCC's response and considers this finding to be closed for purposes of this program review.</b> (pp. 20)</p>
<b>#4 R2T4 Return to Title IV (R2T4) Calculation Errors – Failure to accurately calculate returns to the Title IV programs (R2T4s) when students withdrew from the institution.</b>	<p>The DoE identified liabilities and an analysis of its liability determination in the amount of \$415,216.56. Liabilities for incorrect R2T4 or absence of documentation.</p> <p>Pell \$272,999  Pell Interest \$1,847.56  Direct Loan \$139,696  Direct Loan Interest \$674  Analysis on pp. 9-11</p> <p>DoE determined that CCC was unable to determine the last day of attendance, which is used to calculate R2T4.</p> <p><b>DoE carefully reviewed CCC’s revised policies and procedures and determined they were adequate.</b> (pp.11)</p>

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<b>#5 Pell Underpayments and Overpayment – Failure to award and disburse Pell Grants in the proper amounts.</b>	CCC provided and explained supporting documentation for 5 students listed in the Program Review Report.  <b>Response is adequate.</b>
<b>#6 Failure to Provide Adequate Consumer Information – Components of the required disclosures were incomplete or missing.</b>	CCC made appropriate changes and updates.  <b>Response is adequate.</b>
<b># 7 Inaccurate Reporting to the Common Origination and Disbursement (COD) System – Failure to report accurate and timely information to COD.</b>	CCC made appropriate evaluations and corrections of students statuses in COD and NSLDS.  <b>Responses are adequate.</b>
<b>#8 Late National Student Loan Data System Reporting – to timely update student status information in NSLDS.</b>	CCC made appropriate correction and changes.  <b>Response is adequate.</b>
<b>#9 Missing Documentation of Notification of Disbursement and Cancellation Options – Lack of documentation of disbursement notifications.</b>	CCC made appropriate correction and changes.  <b>Response is adequate.</b>