

CORRECTIVE ACTION PLAN
SAN JOAQUIN VALLEY COLLEGE
OPE ID# 02120700
EIN: 942589126
DUNS: 083845776

Audit Firm: Almich & Associates
Audit Period: 1-1-17 to 12-31-17

FINDING NO. 2017-001

Statement of Condition

Federal Direct Loan Program (FDLP) exit counseling was not performed in a timely manner for certain students.

Comments on Findings and Recommendations

The Institution concurs with the findings and recommendations.

Actions Taken or Planned.

The institution believes that this finding is the result of existing policy and procedure not being consistently followed. Campus financial aid staff failed to closely monitor the exit due date for some students, resulting in late exit interviews. The institution has reviewed the existing exit policy with all FA staff and has added an additional audit at the Central Administrative Office in order to ensure all exit interviews are completed within 30 days.

FINDING NO. 2017-002 (Repeat Finding)

Statement of Condition

One student was underawarded in Federal Pell Grant funds.

Comments on Findings and Recommendations

The Institution concurs with the finding and recommendations.

Actions Taken or Planned.

Institution believes this to be an isolated occurrence where the processor reviewing and approving the Title IV funding did not use the most current ISIR. One of the steps in our current policy was missed to confirm on the award screen that correct ISIR was being used to calculate funding. We are confident that our existing policy in place covers all steps to ensure accuracy. Steps for processing Title IV funding have been reviewed with the processors to make sure all steps are being followed consistently to avoid inaccurate processing in the future.

FINDING NO. 2017-003

Statement of Condition

One first-year, first-time borrower received the first disbursements of Federal Direct Loan Program (FDLP) proceeds prior to completing 30 calendar days of instruction.

Comments on Findings and Recommendations

The Institution concurs with the findings and recommendations.

Actions Taken or Planned.

Institution believes this to be an isolated incident in which not all processing steps were followed. A change to a student start date resulted in the processor approving the Title IV funding failing to notice that the first disbursement date was not delayed 30 days from the new start date as required. We have reviewed existing policy with the appropriate staff and will continue to monitor to assure compliance.

FINDING NO. 2017-004 (Repeat Finding)

Statement of Condition

A Return of Title IV funds calculation was not completed correctly when a student withdrew from an instructional program.

Comments on Findings and Recommendations

The Institution concurs with the findings and recommendations.

Actions Taken or Planned.

The institution believes this is an isolated incident resulting from a financial aid hold status that was placed on a student during a SAP appeal. Disbursements that could have been disbursed were incorrectly excluded from the R2T4 calculation as a result. The institution recalculated the R2T4 and no changes resulted from the recalculation. The institution will continue to carefully monitor R2T4 calculations in order ensure future compliance.

FINDING NO. 2017-005 (Repeat Finding)

Statement of Condition

Verification was not completed prior to disbursement of funds in one student file.

Comments on Findings and Recommendations

The Institution concurs with the findings and recommendations.

Actions Taken or Planned.

Institution believes this to be an isolated incident that processor failed to review and update the verification information on the ISIR from students verification documents submitted. Processor was not following current policy when approving funding and completing verification causing funding to be approved with inaccurate information. We have reviewed the policy with processor to ensure it is being used consistently to avoid future audit findings.

FINDING NO. 2017-006

Statement of Condition

Reconciliation of Federal Direct Loan Program (FDLP) disbursement dates in the Common Origination and Disbursement system (COD) with the Institutions' records was not always performed.

Comments on Findings and Recommendations

The Institution concurs with finding and recommendations.

Actions Taken or Planned.

The institution has existing policies designed to comply with all disbursement requirements. The institution creates disbursement batches for a specific date and requests cash for the amount of accepted disbursement to coincide with the reported disbursement date. Existing policy was not followed consistently and posting dates varied within a few days of reported dates to COD. We have reviewed existing policies with the appropriate staff to ensure that individual batch reconciliation includes confirming the number of disbursements, dollar amounts and confirmation from the accounting department that funding has been posted to the students ledger on the same day reported to COD. The institution will continue to closely monitor disbursements in order to ensure future compliance.

FINDING NO. 2017-007

Statement of Condition

The Institution's 2017 Clery Act Annual Security Report did not contain all required policy statements and had missing/incorrect information related to the crime statistics.

Comments on Findings and Recommendations

The institution concurs with the finding and recommendations.

Actions Taken or Planned.

The institution has a detailed process to gather and publish the Clery Act Annual Security report in a compliant manner. During the audit process, the auditor identified policy statements that needed minor additions in order to better comply with the regulation. This list included the appropriate CFR citation, as well as identifying the specific missing or incomplete part of the policy statement. The institution has detailed notes on needed updates to the existing ASR policy, and is currently making all need corrections to the ASR policy statements in order to be in compliance prior to the next distribution date. The institution has also identified the corrections needed to the ASR crime statistics and will correct the data on the ASR report or the USDE website as required. USDE website corrections will be made as soon as the website becomes available for 2018 data reporting.

FINDING NO. 2017-008

Statement of Condition

The Institution's 2017 Gainful Employment (GE) website disclosure templates contained certain inaccurate information and are not prominently provided on program home pages as required.

Comments on Findings and Recommendations

The institution concurs with the findings and recommendations.

Actions Taken or Planned.

Gainful Employment Disclosures are accessible from each program home by a clear and conspicuous link as required. The link provided takes the student to a campus specific list of GE disclosures for the specific program, rather than opening the program disclosure. The institution used guidance found in GE FAQ D-A1 which indicates that "Institutions may create separate disclosures for versions of a program with different formats or locations (clearly identified as such) if doing so would result in clearer disclosures. Because other disclosures are included on that page, the auditor felt that guidance given in GE FAQ D-A15 applied. The institution believed that it was meeting the intent of the regulations, but will modify it's website to link only to the GE disclosures based on the auditors interpretation in this finding.

The institution performs all operations in MS SQL Server using TSQL queries. The formula was taken directly from Campus Management Campus Nexus student report formula for Gainful Employment Disclosures. The on-time completers/median loan debt data file also did not include students that were Title *N* students but only received grants. This resulted in minor differences in median debt, on-time completion, and percentage of students who borrowed in the most recent award year. The TSQL median debt calculation resulted in slight variances from the median debt calculation described in GE FAQ D-A3. The institution is using the GE FAQ D-A3 method to recalculate median debt information published in the 2018 GE disclosures and will republish the corrected disclosures.

The program lengths published on the GE disclosure were correct. The institution is in the process of updating it's ECAR to reflect the current number of week in the programs.

The institution incorrectly excluded the published U.S.D.E. wage information for 2 programs that had fewer than 30 graduates. No further action is planned since wage information is not included on the 2018 GE Disclosure template.

FINDING NO. 2017-009

Statement of Condition

The Institution's Gainful Employment (GE) reporting file for award year 2016-17 contained certain inaccurate and/or omitted information.

Comments on Findings and Recommendations

The institution concurs with the findings and recommendations

Actions Taken or Planned.

The institution uses Campus Managements Campus Nexus software to produce GE reporting files. During the audit, it was discovered that the original GE file was incomplete due to incorrect system settings. A new file was created and submitted to NSLDS. The institution has identified all of enrollment status discrepancies noted in the finding and is correcting those students on the NSLDS website. The GE reporting software also double counted textbooks for some students as well as other data reporting issues for some students. The institution is currently working with our software provider in order to resolve the minor data discrepancies and will correct the data as soon as possible.

FINDING NO. 2017-010

Statement of Condition

The Institution did not provide students with the graduation rate information as required in 34 CFR 668.45 and 668.41.

Comments on Findings and Recommendations

The institution concurs with the findings and recommendations

Actions Taken or Planned.

The institution provided the required information to each student at time of enrollment. The SRTK information was not included in the annual distribution of Campus Crime Statistics, but the information was posted on the same web page as the other consumer information. The institution will include the SRTK information in future annual distributions. Differences noted by the auditor were due to the fact that the data is compiled at different points in time. Fields such as Graduation Date, Drop Date, and Start Date, when changed after a cohort metric has been pulled, will alter the cohort metric slightly if the data is re-queried from the database. Any data provided is valid as of the date the data is captured by query for the analysis. Individual student count variations between IPEDs and SRTK identified during the audit ranged between one and 10 students. The institution did not identify any differences in the published percentages for any categories.

The institution will modify its practice of querying the database at different points in time, and use the IPEDS data when publishing the SRTK data.

STATUS OF CORRECTIVE ACTIONS ON PRIOR FINDINGS

Finding No. 2016-001

The auditors found that of 75 files tested, 1 student received funds though not eligible at the time of the disbursement. A 2016-17 Federal Pell Grant disbursement was made after the student withdrew from the academic program. The student had not previously established eligibility for the funds in the amount of \$2,908 in the 2016-17 award year. Total questioned costs are \$2,908. Upon learning of this finding, the Institution returned \$2,908 to the Federal Pell Grant Program for the student in this finding. The auditors reviewed the repayment documentation and found it to be accurate. There are no remaining questioned costs associated with this finding.

Action Taken

Corrective action plan completed as reported in original action plan.

Finding No. 2016-002

The auditors found that in 2 of 63 Federal Pell Grant files tested, the students were underawarded in Federal Pell Grant funds. Student No. 1 was underawarded in the amount of \$1,886 in the 2015-16 award year. Student No. 2 was underawarded in the amount of \$50 in the 2016-17 award year. Upon learning of this finding, the Institution paid the underpayments in the amount of \$1,886 to Student No. 1 with institutional funds and \$50 to Student No. 2 with Federal Pell Grant funds. The auditors reviewed the documentation and found it to be accurate.

Action Taken

Corrective action plan completed as reported in original action plan. See current finding No. 2017-002 for additional actions taken by Institution.

Finding No. 2016-003

The auditors found that in 1 of 75 files tested, a second disbursement of a Federal Pell Grant in the amount of \$1,432 was credited to the student's tuition account prior to the beginning of the following term. The auditors noted that the student began the second payment period and remained eligible for the Title IV funds received. There are no questioned costs associated with this finding.

Action Taken

Corrective action plan completed as reported in original action plan.

Finding No. 2016-004

The auditors found that of 75 files tested, the file of 1 student selected for verification was missing the student's income tax transcript and conflicting information with respect to the household size was not resolved. Total net aid received was \$6,352. Upon learning of this finding, the Institution returned \$2,888 to the Federal Pell Grant Program and \$3,464 to the Federal Direct Subsidized Loan Program for the student in this finding. The auditors reviewed the repayment documentation and found it to be accurate. There are no remaining questioned costs associated with this finding.

Action Taken

Corrective action plan completed as reported in original action plan. See current finding No. 2017-005 for additional actions taken by Institution.

Finding No. 2016-005

The auditors found that of 25 files tested for refund compliance, 1 student's file contained an incorrect refund calculation. The Return to Title IV funds calculation did not contain the correct amount that could have been disbursed. Upon learning of this finding, the Institution recalculated the refund using the correct data and we reviewed the revised calculation. The recalculation resulted in an additional refund in the amount of \$1,434 due to the Federal Direct Loan Program. The Institution paid the refund due to the Federal Direct Loan Program for the student in this finding. The auditors reviewed a copy of the refund documentation and found it to be accurate. There are no remaining questioned costs associated with this finding.

Action Taken


Corrective action plan completed as reported in original action plan.

San Joaquin Valley College,



Michael Perry, CEO

6-28-10
Date



Kevin Robinson, Vice- President of Student Financial Services

6/28/10
Date

Corrective Action Plan Prepared by Kevin Robinson
Contact Person (559) 302-1133