



RECEIVED

May 11, 2018

MAY 15 2018

Office of the President

Dr. Joseph E. Savoie
University of Louisiana at Lafayette
104 University Circle
Lafayette, LA 70503-0001

Certified Mail
Return Receipt Requested
7016 0600 0000 6313 6849

RE: **Final Program Review Determination Closeout Letter**
OPE ID: 00203100
PRCN: 201530628992

Dear Dr. Savoie:

This letter is in reference to the documentation received in response to the instructions provided in the Final Program Review Determination. All requirements have been addressed. The institution may now consider the program review closed, with no further action required.

Program records relating to the period covered by this program review are now subject to the record retention requirements in 34 C.F.R. § 668.24(e)(1) and (2), which generally require that records be retained until the close of the third award year following the award year in which the student last attended the institution or the aid was awarded.

The courtesy and cooperation extended during the program review process is appreciated. If you have any questions, please do not hesitate to contact Dalinda Lasater at 214-661-9578.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cynthia Thornton".

Cynthia Thornton, Director
Dallas School Participation Division

cc: Ms. Cindy Perez, Executive Director Student Financial Aid & Scholarships

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

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



January 17, 2018

Dr. Joseph E. Savoie
President
University of Louisiana at Lafayette
104 University Circle
Lafayette, LA 70503-0001

Certified Mail
Return Receipt Requested
7015 0640 0004 5021 6443

RE: **Final Program Review Determination**
OPE ID: 00203100
PRCN: 201530628992

Dear Dr. Savoie:

The U.S. Department of Education's (Department's) Dallas School Participation Team Division issued a program review report on May 20, 2016 covering the University of Louisiana at Lafayette's (ULL's) administration of programs authorized by Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2014-2015 (year to date) award year. ULL's final response was received on October 17, 2016. A copy of the program review report (and related attachments) and ULL's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by ULL 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, and (3) notify the institution of its right to appeal.

The total liabilities due from the institution for this program review are \$84,532.91.

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

Federal Student Aid

An OFFICE of the U.S. DEPARTMENT of EDUCATION

Dallas School Participation Division

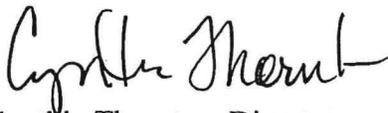
1999 Bryan Street, Suite 1410, Dallas, TX 75201-6817

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 Dalinda Lasater at 214.661.9578. Questions relating to any appeal of the FPRD should be directed to the address

Sincerely,



Cynthia Thornton, Director
Dallas School Participation Division

Enclosure:

Final Program Review Determination letter (including appendices)

cc: Ms. Cindy S. Perez,, Financial Aid Director
LA Board of Regents State of Louisisana
Southern Association of Colleges and Schools Commission on Colleges
Department of Defense
Department of Veterans Affairs
Consumer Financial Protection Bureau

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B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at the University of Louisiana at Lafayette (ULL) from April 21, 2015 to April 23, 2015. The review was conducted by Ms. Dalinda Lasater and Ms. Regina Krob.

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

A sample of 15 files was identified for review from the 2014-2015 (year to date) award year. The student files were selected randomly from the list of students who 1) withdrew or ceased attendance for any reason other than graduation; 2) were selected for verification; and 3) received all non-passing grades ("0" GPA) for any term within the award year being reviewed. A program review report was issued on May 20, 2016.

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

C. Findings and Final Determinations

Resolved Findings

Finding 2. Inaccurate Recordkeeping

Finding 3. Verification Violation

Finding 4. Gainful Employment Disclosure Not Met

Finding 5. Pell Overpayment

Finding 6. Satisfactory Academic Progress Policy Missing Component

Finding 7. Student Status – Inaccurate/Untimely Reporting

Finding 8. Exit Counseling Deficiency

ULL has taken the corrective actions necessary or provided documentation to resolve findings 2, 3, 4, 5, 6, 7 and 8 of the program review report. Therefore, these findings may be considered closed. The findings requiring further action by ULL are discussed below.

Findings with Final Determinations

The program review report findings requiring further action are summarized below. At the conclusion of the finding is a summary of ULL's response to the finding, and the Department's

institution from its initial participation date in Title IV, HEA programs up to May 20, 2016, the date of the program review report. ULL determined that none of the identified credit balance funds were escheated to the Louisiana State Treasury, rather the unclaimed funds were held by the institution. The credit balance deficiencies include the award years 2008-2009 through the 2015-2016 award year. ULL's response can be found in Appendix B.

Final Determination: ULL improperly held undeliverable Title IV credit balance funds in the amount of \$77,936.74.

Award Year	Type of Aid Held by ULL	Amount
2008-2009	Federal Pell Grant	\$90.00
2009-2010	Federal Pell Grant	\$1,332.85
2010-2011	Federal Pell Grant	\$52.90
2011-2012	Federal Pell Grant	\$1,008.00
2012-2013	Federal Pell Grant	\$35.00
2013-2014	Federal Pell Grant	\$110.28
	Total Federal Pell Grant	\$2,629.03
2008-2009	ACG	\$5.75
2009-2010	ACG	\$198.00
	Total ACG	\$203.75
2005-2006	FWS – Federal Share	\$11.89
2007-2008	FWS – Federal Share	\$14.63
2008-2009	FWS – Federal Share	\$65.50
2010-2011	FWS – Federal Share	\$27.88
2011-2012	FWS – Federal Share	\$161.93
2012-2013	FWS – Federal Share	\$849.46
2013-2014	FWS – Federal Share	\$1,706.72
2014-2015	FWS – Federal Share	\$1,032.01
2015-2016	FWS – Federal Share	\$642.54
	Total FWS – Federal Share	\$4,512.56
2008-2009	Federal Perkins Loan	\$3,650.00
	Total Federal Perkins Loan	\$3,650.00
2008-2009	FFEL Subsidized Loan	\$6,020.70
2009-2010	FFEL Subsidized Loan	\$140.00
	Total FFEL Subsidized Loan	\$6,160.70
2008-2009	FFEL Unsubsidized Loan	\$878.84
2009-2010	FFEL Unsubsidized Loan	\$4,800.92
	Total FFEL Unsubsidized Loan	\$5,679.76

Finding 9. Crime Awareness Requirements Not Met – Campus Security Policy Disclosures Inadequate/Omitted from the Annual Security Report (ASR) and Failure to Distribute the ASR in Accordance with Federal Regulations

Citation: The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the Clery Act) and the Department's regulations require that all institutions that receive Title IV, HEA funds must, by October 1 of each year, publish and distribute to its current students and employees through appropriate publications and mailing, a comprehensive Annual Security Report (ASR) that contains, at a minimum, all of the statistical and policy elements described in 34 C.F.R. §668.46(b).

The ASR must be prepared and actively distributed as a single document. Acceptable means of delivery include U.S. Mail, hand delivery, or campus mail distribution to the individual or posting on the institution's website. If an institution chooses to distribute its report by posting to an internet or intranet site, the institution must, by October 1 of each year, distribute a notice to all students and employees that includes a statement of the report's availability and its exact electronic address, a description of its contents, as well as an advisement that a paper copy will be provided upon request. 34 C.F.R. § 668.41(e)(1) The Department's regulations also require participating institutions to provide a notice to all prospective students and employees that includes a statement about the ASR's availability, its contents, and its exact electronic address if posted to a website. This notice must also advise interested parties of their right to request a paper copy of the ASR and to have it furnished upon request. 34 C.F.R. § 668.41(e)(4)

Specifically, the Clery Act and the Department's regulations require institutions to include statistics for incidents of crimes reported during the three most recent calendar years. The covered categories include criminal homicide (murder and non-negligent manslaughter), forcible and non-forcible sex offenses, robbery, aggravated assaults, burglary, motor vehicle theft, and arson. Statistics for certain hate crimes as well as arrest and disciplinary referral statistics for violations of certain laws pertaining to illegal drugs; illegal usage of controlled substances, liquor, and weapons also must be disclosed in the ASR. These crime statistics must be published for the following geographical categories: 1) on campus; 2) on-campus student residential facilities; 3) certain non-campus buildings and property; and, 4) certain adjacent and accessible public property. 34 C.F.R. § 668.46(c)(1)

Several policy statements must be included in the ASR. These disclosures are intended to inform the campus community about the institution's security policies, procedures, and the availability of programs and resources as well as channels for victims of crime to seek recourse. In general, these policies include topics such as the law enforcement authority and practices of campus police and security forces, incident reporting procedures for students and employees, and policies that govern the preparation of the report itself. Institutions are also required to disclose alcohol and drug policies and educational programs. Policies pertaining to sexual assault education, prevention, and adjudication must also be disclosed. Institutions must also provide detailed policies of the issuance of timely warnings, emergency notifications, and evacuation procedures.

possibility that the Department will impose an adverse administrative action and/or require additional corrective measures as a result.

ULL's Response: In its official response, ULL management concurred with the finding and stated that it "recognizes its obligation to be in compliance with the *Clery Act*." University officials also declared that the violations cited in the finding were "rectified." Furthermore, ULL noted that provisions were put into place to ensure compliance with the *Clery Act*. A copy of ULL's original 2015 ASR with the incorporated improvements was submitted as part of the response.

Final Determination: Finding 9 cited ULL for its failure to include two required programmatic disclosures in its 2014 ASR, as outlined in the Noncompliance section above. As a result of this violation, the Department instructed the University to review and revise its policies and procedures regarding the production and distribution of future ASRs and to otherwise ensure that all facets of the process are carried out in a manner that meets federal regulations. In its response, ULL concurred with the finding, described its remedial actions, submitted documents in support of its claims, including a statement that the University understands its *Clery Act* obligations and that all necessary corrective actions were taken to ensure the violations did not recur.

The Department carefully reviewed all available information including ULL's response and supporting documentation. Based on that review and the University's admissions, the violations identified in the initial finding are sustained. The review team's examination also showed that the identified violations were, for the most part, satisfactorily addressed by the University's 2015 ASR and new and revised internal policies and procedures. As such, the Department has also determined that ULL's corrective action plan meets minimum requirements. For these reasons, the Department has accepted ULL's response and considers this finding to be closed for the purposes of this program review. Nevertheless, the officers and directors of ULL are advised that they must take any additional actions that may be needed to address the deficiencies identified by the Department, as well as any other deficiencies or weaknesses that were detected during the preparation of the response, and/or as may otherwise be needed to ensure that these violations do not recur.

ULL is reminded that the exceptions identified above constitute 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. The requirement to produce and distribute an accurate and complete ASR is a foundational requirement of the *Clery Act* and is essential to the campus safety goals of the law. Access to this information permits campus community members and their families to make well-informed decisions about where to study and work and empowers individuals to play a more active role in their own safety and security. ULL asserted that it has taken adequate remedial actions and that by doing so, that it is now in compliance with the *Clery Act* as required by its Program Participation Agreement (PPA). Nevertheless, ULL officials must understand that the compliance failures documented above deprived the campus community members of important campus security information to which they were entitled. For these reasons, ULL is advised that

- A written description of legal sanctions imposed under Federal, state and local laws for unlawful possession or distribution of illicit drugs and alcohol;
- A description of the health risks associated with the use of illicit drugs and the abuse of alcohol;
- A description of any drug or alcohol counseling, treatment, or rehabilitation or re-entry programs that are available to students and employees; and,
- A statement that the IHE will impose disciplinary sanctions on students and employees for violations of the institution's codes of conduct and a description of such sanctions.

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

Noncompliance: ULL violated multiple provisions of the DFSCA and the Department's Part 86 Regulations. Specifically, the University failed to implement and develop a compliant DAAPP.

Furthermore, the University did not conduct a substantive biennial review of the effectiveness of its DAAPP and of the consistency of sanctions imposed for violations of its disciplinary standards and codes of conduct and by logical extension, also failed to prepare a biennial review report of findings. In fact, ULL was unable to produce evidence to show that a biennial review was ever conducted.

Required Action: The Department instructed ULL to take all necessary corrective actions to resolve the violations. At a minimum, the University had to take the following steps to ensure that its drug and alcohol program addressed all of the elements required by the DFSCA:

Develop and implement a substantive drug and alcohol abuse prevention program and publish a materially-complete DAAPP disclosure that included all of the required elements and summarized the program;

ULL had to send a copy of its new and revised DAAPP policies along with a certification statement attesting to the fact that the materials were distributed in accordance with the DFSCA with its response to the program review report;

Conduct a biennial review to measure the effectiveness of its existing drug and alcohol programs and new DAAPP. In addition, the report had to identify the responsible official(s) who conducted the review. In addition the University's President and/or its Board had to approve the report;

program materials, new biennial review plan including its 2013-2015 biennial review, new and revised policies and procedures. As such, the Department also determined that the University's remedial action plan meets minimum requirements. For these reasons, the Department has accepted the response and considers this finding to be closed for purposes of this program review. Nevertheless, the officials and directors of ULL are put on notice that the University must take all necessary action to address the deficiencies and weaknesses identified by the Department as well as those that were detected during the preparation of the response to the Department's report and as may otherwise be needed to ensure that these violations do not recur.

In this regard, ULL is advised that it must continue to develop its DAAPP. The University must also ensure that it distributes accurate and complete DAAPP materials to all students and employees on an annual basis in accordance with the Department's regulations and the University's procedures. Moreover, going forward, ULL must conduct substantive biennial reviews and do so on the required schedule. Institutional officials must take care to ensure that each review is in fact a probative inquiry into the program's effectiveness. The review process must not merely become a conclusory ratification of existing policy. Finally, the University must produce detailed reports that clearly state the methods used and outcomes reached during each review. Each report must also be approved by ULL's chief executive and/or its Board.

ULL is reminded that the exceptions identified above constitute serious and persistent violations of the DFSCA that by their nature cannot be cured. There is no way to truly "correct" violations of this type once they occur. The University asserted that it has taken adequate remedial actions and is now in compliance with the DFSCA as required by its PPA. Nevertheless, ULL officials must understand that the Department deems compliance with the DFSCA is essential to maintaining a safe and healthy learning environment. This is true for all institutions regardless of their size, location, or organizational structure. Data compiled by the Department shows that substance abuse is highly correlated to increased incidents of violent crime on campus, increased absenteeism, and a failure to graduate. The compliance failures identified above deprived the University and its officials of important information about the effectiveness of any drug and alcohol programs that were in place during the Department's review period. Such failures may contribute to increased drug and alcohol abuse on-campus as well as an increase in drug and alcohol-related violent crime and constitute a violation of Federal law. For these reasons, ULL is reminded that corrective measures 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 measures as a result.

Finally, the Department strongly recommends that ULL re-examine its drug and alcohol abuse prevention policies, procedures, and programs on at least an annual basis and revise them as needed to ensure that they continue to reflect current University policies and are in full compliance with the DFSCA. Please be advised that the Department may request information on a periodic basis to test the effectiveness of ULL's new policies and procedures.

Payment must be made via check and sent to the above Post Office Box. Payment and/or adjustments made via G5 will not be accepted as payment of this liability. Instead, the school must first make any required adjustments in COD as required by the applicable finding and the instructions by Title IV, HEA Program (below), remit payment, and upon receipt of payment the Department will apply the funds to the appropriate G5 award (if necessary).

The following identification data must be provided with the payment:

Amount: \$64,514.25
DUNS: 961859980
TIN: 726000820
Program Review Control Number: 201530628992

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. ULL is also responsible for repaying any interest that accrues. If you have any questions regarding interest accruals or payment credits, contact the Department's Debt and Payment Management Group at (202) 245-8080 and ask to speak to COM's account representative.

If full payment cannot be made within **45** days of the date of this letter, contact the Department's Debt and Payment Management Group to apply for a payment plan. Interest charges and other conditions apply. Written request may be sent to:

U.S. Department of Education
OCFO Financial Management Operations
Debt and Payment Management Group
550 12th Street, S.W., Room 6114
Washington, DC 20202-4461

If within 45 days of the date of this letter, ULL 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 ULL from the Federal Government. ULL **may object to the collection by offset only by challenging the existence or amount of the debt**. To challenge the debt, ULL 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**

If any checks are returned to your school from a loan holder, please contact Ms. Dalinda Lasater.

William D. Ford Federal Direct Loan (Direct Loan) Closed Award Years (Request Extended Processing)

Finding: #1
Appendix: C

ULL must repay the following Direct Loan liabilities:

Direct Loan Closed Award Years		
Amount (Principal)	Amount (COF Interest)	Award Year
\$6,282.50	\$235.00	2011-2012
\$9,861.42	\$308.00	2012-2013
\$22,606.50	\$456.00	2013-2014
\$13,750.02	\$185.00	2014-2015
Total Principal	Total Interest	
\$52,500.44	\$1,184.00	

The disbursement record for each student identified in the appendix listed above must be adjusted in the Common Origination and Disbursement (COD) system based on the recalculated amount identified in the/these appendix/appendices. A copy of the adjustment to each student's COD record must be sent to Ms. Dalinda Lasater **within 45 days of the date of this letter.**

Procedure to Request Extended Processing

The DL program year closes 13 months after the award year ends (on the last business day in July of the following year). For example 2011-2012 will close July 31, 2013. COD adjustments are necessary for the closed award years listed above. Before any student level adjustments can be processed, ULL must immediately request extended processing through the COD Website (<http://cod.ed.gov>).

- Click on the Request Post Deadline/Extended Processing link under the School menu.
- On the request screen, the institution should indicate in their explanation that the request is based on a program review, and provide the program review control number.
- The institution will be notified of the status of the request at the time of submission, and will also be notified by email to the FAA and President when extended processing has been authorized. At that time, the school must transmit student/borrower level adjustments to COD for the closed award years.

Liabilities Owed to the Department in the case of Title IV Grants

Pell – Closed Award Years

Finding: 1
Appendix: C

ULL must repay the following Pell liabilities:

Pell Closed Award Years			
Amount (Principal)	Amount (COF Interest)	Title IV Grant	Award Year
\$35.00	\$1.22	Pell	2012-2013
\$110.28	\$2.23	Pell	2013-2014
Total Principal	Total Interest		
\$145.28	\$3.45		

done 3/12/18

The disbursement record for each student identified in Appendix C must be adjusted in the Common Origination and Disbursement (COD) system based on the recalculated amount identified in the appendix.

Adjustments in COD must be completed prior to remitting payment to the Department. Payment cannot be accepted via G5. Once the Department receives payment via check, the Department will apply the principal payment to the applicable G5 award. The interest will be applied to the general program account.

Before any student level adjustments can be processed in COD, ULL must immediately request extended processing through the COD Website (<http://cod.ed.gov>).

- Click on the Request Post Deadline/Extended Processing link under the School menu.
- On the request screen, the institution should indicate in their explanation that the request is based on a program review, and provide the program review control number.
- The institution will be notified of the status of the request at the time of submission, and will also be notified by email to the FAA and President when extended processing has been authorized. At that time, the school must transmit student/borrower level adjustments to COD for the closed award years.

A copy of the adjustment to each student's COD record must be sent to Dalinda Lasater **within 45 days of the date of this letter.**

Liabilities Owed to the Department in the case of Campus Based Programs

Federal Work-Study (FWS)

Finding: #1
 Appendix: C

ULL must repay the following FWS liabilities:

FWS Liabilities			
Amount (Federal Share)	Amount (COF Interest)	Title IV Program	Award Year
\$11.89	\$4.49	FWS	2005-2006
\$14.63	\$3.40	FWS	2007-2008
\$65.50	\$10.99	FWS	2008-2009
\$27.88	\$1.45	FWS	2010-2011
\$161.93	\$6.53	FWS	2011-2012
\$849.46	\$27.43	FWS	2012-2013
\$1,706.72	\$33.36	FWS	2013-2014
\$1,032.01	\$12.99	FWS	2014-2015
\$642.54	\$1.60	FWS	2015-2016
Total Federal Share	Total Interest		
\$4,512.56	\$102.24		

The funds for the liability above will be returned to the Department’s general Federal Work-Study fund since it has been established that ULL is unable to locate the students; subsequently, making the funds undeliverable. This liability is reflected in the total amount owed to the Department.

In addition, ULL must make corrections to its FISAP for award years 2011-2012 through 2015-2016, as follows:

- Log into eCB and make change(s) to the Working Copy, click on Submit and choose “Change Request.” Provide the justification for the changes in the comments box, including that the changes are a result of a program review and include the Program Review Control Number.
- Once the request is approved, submit the changes within 5 days.
- Changes to the FISAP may result in changes to subsequent FISAPS. Contact the eCB Call Center at (877) 801-7168 for assistance in making this determination.
- If the recalculation of the school’s funding results in an unprocessed deobligation (negative balance) because the school has drawn down its full authorization, return those funds via G5 in accordance with the automated notification from eCB. If the school has not drawn down its full authorization, the authorization will be reduced.

F. Appendices

Appendix A – Program Review Report

Appendix B – Institution's Response

Appendix C – Cost of Funds

Appendix D – Student Lists

Prepared for

**University of
Louisiana at Lafayette**

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

PROUD SPONSOR of
the AMERICAN MIND™

**OPE ID 00203100
PRCN 201530628992**

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

Program Review Report
May 20, 2016

A. Institutional Information

University of Louisiana at Lafayette
200 East University Avenue
Lafayette, LA 70504- 0001

Type: Public

Highest Level of Offering: Master's Degree or Doctor's Degree

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

Current Student Enrollment: 17,195 (fall 2014)

% of Students Receiving Title IV: 64%

Title IV Participation (PCNet Website):

2013-2014

Federal Pell Grant (Pell Grant)	\$21,317,387
William D. Ford Federal Direct Loan Program (Direct Loan)	\$47,845,442
Federal Perkins Student Loan Program	\$ 715,772
Supplemental Educational Opportunity Grant (SEOG)	\$ 300,850
Federal Work Study (FWS)	\$ 1,027,414

Default Rate DL:	2012	7.6%
	2011	9.3%
	2010	9.9%

Default Rate Perkins:	2014	14.9%
	2013	13.6%
	2012	13.8%

The institution has a fiduciary responsibility to:

- Safeguard Title IV, HEA funds;
- Ensure that Title IV, HEA funds are used for the purpose intended;
- Act on the student's behalf to repay a student's educational loan debt when the institution is unable to pay a credit balance directly to the student, and
- Return to the Department any Title IV, HEA funds that cannot be used as intended.

34 C.F.R § 668.164(h)

Noncompliance: During interviews with ULL officials, the program reviewers were told that undeliverable Title IV credit balance funds are determined to be unclaimed property and; therefore, sent to the Louisiana State Treasury. In addition, ULL was unable to provide documentation to support that federal funds were returned to the Department for any Title IV program funds that were undeliverable to students.

Required Action: ULL must determine the amount of undeliverable Title IV credit balance funds that were either held by ULL or escheated to the Louisiana State Treasury, beginning with its initial participation date in the Title IV, HEA programs up to the date of this program review report. Based on its research, ULL must provide the following information to the Department in an encrypted Excel spreadsheet with the following elements:

- Student Last Name, First name
- Social security number
- Award year(s)
- Original amount disbursed, by Title IV program
- Amount escheated to the State or retained by ULL
- Amount recovered from State, if applicable
- Action(s) taken to re-deliver funds to the students

Please include the total amount of fund escheated to the state or retained by ULL by award year by Title IV program. The amount of unreturned credit balance funds that were not delivered to students will be considered a liability to the Department. Instructions for repayment of any identified liabilities will be provided in the Final Program Review Determination letter.

Finding 2. Inaccurate Recordkeeping

Citation: An institution shall account for the receipt and expenditure of Title IV program funds in accordance with generally accepted accounting principles. An institution shall establish and maintain, on a current basis, financial records that reflect each Title IV program transaction and general ledger control accounts and related subsidiary accounts that identify each transaction and separate those transactions from all other institutional financial activity.

An institution must establish procedures to request, receive, and verify applicant data for each award year. Institutions are also responsible for resolving conflicting information related to a student's application for federal student aid. The following is a list of data elements that must be verified for the 2014-2015 award year:

2014-2015:

V1 – Standard Verification Group

- Household size;
- Number enrolled in college;
- Adjusted Gross Income (AGI);
- U.S. income tax paid; and,
- Other untaxed income and benefits;
- SNAP if reported on ISIR; and
- Child support paid if reported on ISIR.

V2 – Please note the SNAP Verification Group was eliminated for 2014-2015

V3 – Child Support Paid Verification Group

V4 – Custom Verification Group (High School Completion Status /Statement of Educational Purpose; SNAP, if reported on ISIR; Child Support Paid, if reported on the ISIR)

V5 – Aggregate Verification Group (Standard Verification Criteria (V1); High School Completion Status; Identity/Statement of Educational Purpose)

V6 – Household Resources Verification Group (Standard Verification Criteria (V1); Other Untaxed Income; SNAP, if reported on ISIR; Child Support Paid, if reported on ISIR)

Supporting documentation collected from the student (and parents or spouse, if applicable) is compared to the information reported on the student's Institutional Student Information Record (ISIR). Verification documentation collected must be retained in the student's file as evidence that the process was completed.

Noncompliance: ULL failed to complete verification for Student #1. Specifically, the student's 2014-2015 ISIR, transaction 03, indicates that there are 5 members in the household, while the student's 2014-2015 Verification Worksheet states that there are 6 members in the household. It does not appear that this conflicting information was resolved prior to the disbursement of Title IV, HEA program funds. The student received a Federal Pell Grant disbursement in the amount of \$1,940.00 for the fall 2014 semester.

Required Action: ULL must resolve the verification deficiency and demonstrate that verification has been properly completed for the student referenced above. If the student's EFC and Federal Pell Grant disbursement change as a result of verification, ULL is liable for the difference between the correct disbursement and the actual disbursement. Also, if ULL cannot complete the verification process, ULL is liable for the actual disbursement.

The Department also notes that ULL did not use the required disclosure form issued by the Secretary. The Gainful Employment Electronic Announcement #46, issued on November 22, 2013, describes the "Release of the Disclosure Template for Gainful Employment (GE) Programs." The regulations at 34 C.F.R. § 668.6(b)(2)(iv) provide that institutions must use the Disclosure Template issued by the Secretary to provide the required GE disclosures. Institutions must, no later than January 31, 2014, use the output document produced from the GE Disclosure Template to meet the currently effective GE disclosure regulatory requirements.

Required Action: ULL must review the Final regulations published in the Federal Register on October 31, 2014 and all of the required reporting and disclosure information for programs that prepare students for gainful employment in a recognized occupation as specified in 34 C.F.R. § 668.6, and update all GE Disclosure information on the institution's website. The Final Regulations can be found at this link: <http://www.gpo.gov/fdsys/pkg/FR-2014-10-31/pdf/2014-25594.pdf>

In addition, ULL should continue to monitor the Gainful Employment Information Page on the Department's Information for Financial Aid Professionals (IFAP) Web site for information and updates. The GE Information Page provides resources, training opportunities, answers to frequently asked questions, reporting and disclosure information and GE updates as they become available. The web link is:

<http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/integrity-qa.html>.

ULL must provide the active link to its GE disclosure information located on its website and documentation that the required reporting and disclosure requirements are being met in its response to the program review report.

Finding 5. Pell Overpayment

Citation: The amount of a student's Pell Grant for an academic year is based upon the payment and disbursement schedules published by the Secretary for each award year. *34 C.F.R. § 690.62(a)*

Noncompliance: ULL over-awarded Federal Pell Grant funds to Student #6. Specifically, the student had an expected family contribution (EFC) of \$1,653. The student was eligible to receive Federal Pell Grant funds of \$1,530.00 for three-quarter time enrollment for the fall 2014 semester. However, Federal Pell Grant funds for full-time enrollment in the amount of \$2,040.00 were disbursed. Per the student's academic transcript, enrollment consisted of 11 credit hours and 1 non-credit hour course. Therefore, the student was only eligible to receive a three-quarter time Federal Pell Grant award. The student was over-awarded by \$510.00 in the Federal Pell Grant Program for fall 2014.

Required Action: As part of the institution's response to the program review report, ULL must submit documentation for Student #6 to support his eligibility for the Federal Pell Grant funds disbursed. If documentation cannot be provided, the funds disbursed will be a liability.

enrollment information is extremely important because it is used to determine if the student is still considered in-school, must be moved into repayment or is eligible for an in-school deferment. For students moving into repayment, the out-of-school status effective date determines when the grace period begins and how soon a student must begin repaying loan funds. Changes in enrollment to less than half-time, graduated, or withdrawn must be reported within 30 days unless a student status confirmation report is expected within 60 days. *34 C.F.R. § 685.309(b)*

Noncompliance: ULAL failed to report (certify) the correct enrollment status to NSLDS for the following students in a timely manner:

Student #8: Student was never reported for fall 2014 as full-time student.

Student#12: Student withdrew from the fall 2014 semester on 10/6/2014 and was certified as withdrawn in NSLDS on 1/26/2015.

Required Action: Based on the number of occurrences, ULAL must review the enrollment status for all students enrolled during the 2014-2015 award year to ensure that all students have been accurately reported. In response to this report, please provide assurances that all required reporting has been completed.

In addition, the institution must develop a policy and procedure to ensure timely and accurate student enrollment data reporting. A copy of the policy must be submitted with the institution's response to the program review report.

Finding 8. Exit Counseling Deficiency

Citation: An institution must ensure that exit counseling is conducted with each Federal Direct Loan (FDL) borrower shortly before the student borrower ceases at least half-time enrollment at the institution either in person, by audiovisual presentation, or by interactive electronic means. If a student borrower withdraws without the institution's prior knowledge or fails to complete an exit counseling session as required, the institution must ensure that exit counseling is provided through either electronic means or by mailing written counseling materials to the student borrower's last known address within 30 days of learning that the student failed to complete the required exit counseling. *34 C.F.R. § 685.304(b)*

Noncompliance: ULL failed to provide documentation of exit counseling for the following students:

Student #3: The student did not return after the fall 2014 semester which ended on 12/19/2014. The institution was unable to provide evidence that exit counseling materials were provided to the student who ceased to be enrolled at least half time since the student did not re-enroll for the spring 2015 semester.

posted to a website. This notice must also advise interested parties of their right to request a paper copy of the ASR and to have it furnished upon request. *34 C.F.R. §668.41(e)(4)*.

Specifically, the *Clery Act* and the Department's regulations require institutions to include statistics for incidents of crimes reported during the three most recent calendar years. The covered categories include criminal homicide (murder and non-negligent manslaughter), forcible and non-forcible sex offenses, robbery, aggravated assaults, burglary, motor vehicle theft, and arson. Statistics for certain hate crimes as well as arrest and disciplinary referral statistics for violations of certain laws pertaining to illegal drugs, illegal usage of controlled substances, liquor, and weapons also must be disclosed in the ASR. These crime statistics must be published for the following geographical categories: 1) on campus; 2) on-campus student residential facilities; 3) certain non-campus buildings and property; and, 4) certain adjacent and accessible public property. *34 C.F.R. §668.46(c)(1)*.

Several policy statements must be included in the ASR. These disclosures are intended to inform the campus community about the institution's security policies, procedures, and the availability of programs and resources as well as channels for victims of crime to seek recourse. In general, these policies include topics such as the law enforcement authority and practices of campus police and security forces, incident reporting procedures for students and employees, and policies that govern the preparation of the report itself. Institutions are also required to disclose alcohol and drug policies and educational programs. Policies pertaining to sexual assault education, prevention, and adjudication must also be disclosed. Institutions also must provide detailed policies of the issuance of timely warnings, emergency notifications, and evacuation procedures. All required statistics and policies must be included in a single comprehensive document, known as an ASR. With the exception of certain drug and alcohol program information, cross-referencing to other publications is not sufficient to meet the publication and distribution requirements of the Act. *§485(f)* of the *HEA*; *34 C.F.R. §668.46(b)*.

Finally, each institution must also submit its crime statistics to the Department for inclusion in the Office of Postsecondary Education's (OPE) "Campus Safety and Security Data Analysis Cutting Tool." *34 C.F.R. § 668.41(e)(5)*.

Noncompliance: ULL violated the *Clery Act*. Specifically, ULL failed to publish and distribute an accurate and comprehensive 2014 ASR in accordance with *34 CFR § 668.46(b)*. The University's 2014 ASR did not include the following required statements:

- A description of programs for drug and alcohol abuse prevention program and;
- A description of the sexual assault education program(s) available to the campus community.

Failure to publish an accurate and complete ASR and to actively distribute it in accordance with Federal regulations deprives the campus community of important security information that empowers its members to be informed and play an active role in their own safety and security.

regarding sexual assault prevention and response in their ASRs. All institutions are currently obligated to make a documented good-faith effort to comply with the statutory requirements of VAWA and were required to include all new required content in the 2014 ASR. Because the Department issued Final Rules on the VAWA amendments on October 20, 2014, these regulations went into effect on July 1, 2015, per the Department's Master Calendar. In light of the violations documented above, CAB is advised to bring its sexual assault policies up to the standard required by VAWA now. ULL officials may access the text of the Final Rule at: <http://ifap.ed.gov/fregisters/attachments/FR102014FinalRuleViolenceAgainstWomenAct.pdf>.

Finding 10. Drug and Alcohol Abuse Prevention Program Requirements Not Met – Multiple Violations

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

On an annual basis, the IHE must distribute written information about its Drug and Alcohol Abuse Prevention Program (DAAPP) to all students, faculty, and staff. The distribution plan must make provisions for providing the material to students who enroll at a date after the initial distribution, and for employees who are hired at different times throughout the year. The information must include:

- A written statement about its standards of conduct that prohibits the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees;
- A written description of legal sanctions imposed under Federal, state and local laws for unlawful possession or distribution of illicit drugs and alcohol;
- A description of the health risks associated with the use of illicit drugs and the abuse of alcohol;
- A description of any drug or alcohol counseling, treatment, or rehabilitation or re-entry programs that are available to students and employees; and,
- A statement that the IHE will impose disciplinary sanctions on students and employees for violations of the institution's codes of conduct and a description of such sanctions.

In addition, each IHE must conduct a biennial review in order to measure the effectiveness of its drug prevention program and to ensure consistent treatment students and employees in its enforcement of disciplinary sanctions. The IHE must prepare a report of findings and maintain

biennial review must commence immediately upon receipt of this program review report and be completed by June 20, 2016. Finally, the Institution must submit its biennial review report of findings to the review team by July 5, 2016;

- ULL must also submit copies of the two most-recent biennial review reports that the Institution has produced (if any) with its response to this program review report. If no such reports were ever produced, ULL officials must clearly state that fact in its response. In this context, University officials are specifically advised that no new documents are to be created for the purpose of demonstrating compliance with the biennial review report requirement for past periods; and,
- ULL must establish policies and procedures to ensure that all subsequent biennial reviews are conducted in a timely manner and are fully documented and to take all other necessary action to ensure that this violation does not recur. A copy of these policies and procedures must accompany the University's submission of its biennial review report.

As noted above, violations of the *DFSCA* are serious and by their nature, cannot be cured. ULL will be given an opportunity to take remedial action and in so doing, can begin to bring its drug and alcohol programs into compliance with the *DFSCA* for the first time as required by its PPA. However, the University is advised that these remedial measures 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 measures as a result.

Based on an evaluation of all available information including ULL's response, the Department will determine if additional actions will be required and will advise the University accordingly in the FPRD.

Finally, in light of the serious consequences associated with compliance failures of this type, the Department strongly recommends that ULL re-examine its DAAPP policies and procedures on at least an annual basis and revise them as needed to ensure that they continue to reflect current institutional policy and are in full compliance with the *DFSCA*. Please be advised that the Department may request information on a periodic basis to test the effectiveness of the University's new policies and procedures.

D. Appendices

Appendix A (Student Sample) contains personally identifiable information and will be emailed to ULL as an encrypted WinZip file using Advanced Encryption Standard, 256-bit. The password needed to open the encrypted WinZip file will be sent in a separate email.

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Appendix B – Institution's Response

Program Review Finding 1. Student Credit Balance and Escheating Deficiencies

The University concurs with the finding.

The University has been working to contact each student who has a stale dated check. Each payee of the outstanding checks through 2014 has been sent a letter and we are currently in the process of notifying payees of the checks from 2015. 324 checks have been identified to have been generated as federal refunds or federal earnings to students. These checks are identified in the attached Excel Spreadsheet as requested. The checks that are still outstanding and are not federal aid will be sent to the State of Louisiana Unclaimed Property Division, which is a division of the Louisiana Department of Revenue.

Upon further research it was determined that the University has never sent any stale dated checks to the State's Unclaimed Property Division.

Attachment: UL Lafayette Outstanding Checks – Federal Aid

Program Review Finding 2. Inaccurate Recordkeeping

The University concurs with this finding.

The University implemented an integrated computer system, Banner, with the 2016-2017 award year. Because it is integrated, payments are posted immediately so there is no need for manual processing as it was with the system in place for 2014-2015. This implementation should eliminate the discrepancies between the student ledger and the COD disbursement date.

Program Review Finding 3. Verification Violation

The University concurs with this finding.

Student #1 information was corrected to reflect 6 in the household resulting in an EFC of 677 and a fulltime Federal Pell Award of \$2,540. The Financial Aid Office has requested a \$600 check processed for the student. The Financial Aid Office has contacted the student to verify her correct address for the check to be mailed. We will follow up with the Business Office to verify the check has cleared the bank.

Attachment: Student #1 Updated Verification

The Financial Aid Office has implemented a procedure where the Director, Assistant Director, or designee, who is knowledgeable of verification, periodically audits the files of students who have had their verification completed. The implementation of Banner allows the Financial Aid Office to identify files by verified date as well as by employee so we can confirm the correct information has been verified and therefore the student has received the appropriate amount of Federal Aid.

Program Review Finding 6. Satisfactory Academic Progress Policy Missing Component

The University concurs with this finding.

The University has updated the SAP Policy to include the limit on course repetitions. This policy was put into effect for the 2016-2017 Award Year.

A copy of the revised SAP policy is attached.

The link to our SAP policy on the website is:

<http://financialaid.louisiana.edu/content/eligibility-policies/satisfactory-academic-progress>

Program Review Finding 7. Student Status – Inaccurate/Untimely Reporting

The University concurs with this finding.

The Financial Aid Office has verified that all unofficial withdrawals for the 2014-2015 academic year and forward have been reported to NSLDS. We have also met extensively with the Registrar's Office to ensure the reporting all students enrolled each and every semester.

We have instituted additional policies and procedures to ensure accurate and timely enrollment reporting. All unofficial withdrawals are manually updated on NSLDS once they are determined to be an unofficial withdrawal. The University reports enrollment through the National Clearinghouse at least six times a semester. The implementation of Banner on our campus will assist the University in accurate and timely reporting of enrollment information.

Program Review Finding 8. Exit Counseling Deficiency

The University concurs with this finding.

The Financial Aid Office is working along with the IT department to identify and contact all students who did not return to the University during the 2014-2015 academic year as well as all those in the 2015-2016 year.

We have set up the Banner system to identify students who don't return to the University so they can be properly notified, as soon as possible, of the required Exit Counseling information.

University of Louisiana at Lafayette

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Appendix C – Cost of Funds

300	481462	\$ 10.00	Pell Grant	9/7/2012	5/5/2013	10/17/2016	1261	1.00%	\$ 10.00	\$ 0.35	\$ -
301	481682	\$ 5.00	Pell Grant	9/7/2012	5/5/2013	10/17/2016	1261	1.00%	\$ 5.00	\$ 0.17	\$ -
302	481799	\$ 10.00	Pell Grant	9/7/2012	5/5/2013	10/17/2016	1261	1.00%	\$ 10.00	\$ 0.35	\$ -
303	481932	\$ 10.00	Pell Grant	9/7/2012	5/5/2013	10/17/2016	1261	1.00%	\$ 10.00	\$ 0.35	\$ -
310	674995	\$ 110.28	Pell Grant	2/13/2014	10/11/2014	10/17/2016	737	1.00%	\$ 110.28	\$ 2.23	\$ -

Total Ineligible **\$11,590.95**

Totals **\$ 269.06** **\$ 41.87**
 ACA Liability **\$ 437.91**

Campus-Based Amounts Spent (from FISAP, Part VI, Section B)

Federal FWS **\$ 785,394.00**
 Federal SEOG **\$ 368,825.00**
 Federal Perkins **\$ 346,990.00**

Total C-B Spent **\$ 1,501,209.00**
 ACA Percentage **5%**

	Total	Federal Share
Pell	\$ 2,629.03	
ACG	\$ 203.75	\$ 203.75
SMART	\$ -	\$ -
TEACH	\$ -	\$ -
FWS	\$ 5,108.17	\$ 4,512.56
FSEOG	\$ -	\$ -
Perkins	\$ 3,650.00	
FWS-50% Match	\$ -	\$ -
FWS-No Match	\$ -	\$ -
FSEOG-No Match	\$ -	\$ -
Perkins-No Match	\$ -	\$ -

Total Campus-Based **\$ 8,758.17** **\$ 4,512.56**

Interest Breakdown

Pell Grants	\$ 153.98	\$ -
ACG	\$ 12.84	\$ -
SMART	\$ -	\$ -
TEACH	\$ -	\$ -
FWS	\$ 102.24	\$ -
FSEOG	\$ -	\$ -
Perkins	\$ -	\$ 41.87
FWS-50% Match	\$ -	\$ -
FWS-No Match	\$ -	\$ -
FSEOG-No Match	\$ -	\$ -
Perkins-No Match	\$ -	\$ -

ACA Breakdown

FWS	\$ 255.41
FSEOG	\$ -
Perkins	\$ 182.50
FWS-50% Match	\$ -
FWS-No Match	\$ -
FSEOG-No Match	\$ -
Perkins-No Match	\$ -

****ULL claimed ACA only in the Federal Perkins Program on FISAP submitted on October 1, 2016. Therefore, the total ACA Liability of \$437.91 has been applied to the Federal Perkins Program.**

151	282254	\$ 5.00	DL Unsub	9/10/2010	5/8/2011	10/17/2016	1989	1.00%			\$0.00
152	282324	\$ 5.00	DL Unsub	9/10/2010	5/8/2011	10/17/2016	1989	1.00%			\$0.00
153	282360	\$ 5.00	DL Unsub	9/10/2010	5/8/2011	10/17/2016	1989	1.00%			\$0.00
154	282414	\$ 5.00	DL Unsub	9/10/2010	5/8/2011	10/17/2016	1989	1.00%			\$0.00
155	285604	\$ 44.50	DL Unsub	10/21/2010	6/18/2011	10/17/2016	1948	1.00%			\$2.00
156	287779	\$ 11.75	DL Unsub	11/24/2010	7/22/2011	10/17/2016	1914	1.00%			\$1.00
157	361160	\$ 1,306.00	DL Unsub	1/12/2011	9/9/2011	10/17/2016	1865	1.00%			\$67.00
158	362332	\$ 17.00	DL Unsub	1/12/2011	9/9/2011	10/17/2016	1865	1.00%			\$1.00
159	365687	\$ 63.50	DL Unsub	1/28/2011	9/25/2011	10/17/2016	1849	1.00%			\$3.00
160	366483	\$ 15.00	DL Unsub	2/4/2011	10/2/2011	10/17/2016	1842	1.00%			\$1.00
161	366503	\$ 15.00	DL Unsub	2/4/2011	10/2/2011	10/17/2016	1842	1.00%			\$1.00
162	366592	\$ 15.00	DL Unsub	2/4/2011	10/2/2011	10/17/2016	1842	1.00%			\$1.00
163	366645	\$ 15.00	DL Unsub	2/4/2011	10/2/2011	10/17/2016	1842	1.00%			\$1.00
164	366713	\$ 15.00	DL Unsub	2/4/2011	10/2/2011	10/17/2016	1842	1.00%			\$1.00
165	366721	\$ 15.10	DL Unsub	2/4/2011	10/2/2011	10/17/2016	1842	1.00%			\$1.00
166	366722	\$ 48.00	DL Unsub	2/4/2011	10/2/2011	10/17/2016	1842	1.00%			\$2.00
167	366733	\$ 5.00	DL Unsub	2/4/2011	10/2/2011	10/17/2016	1842	1.00%			\$0.00
168	366771	\$ 15.00	DL Unsub	2/4/2011	10/2/2011	10/17/2016	1842	1.00%			\$1.00
169	366854	\$ 25.00	DL Unsub	2/4/2011	10/2/2011	10/17/2016	1842	1.00%			\$1.00
170	366905	\$ 15.00	DL Unsub	2/4/2011	10/2/2011	10/17/2016	1842	1.00%			\$1.00
171	366941	\$ 10.00	DL Unsub	2/4/2011	10/2/2011	10/17/2016	1842	1.00%			\$1.00
172	367041	\$ 5.00	DL Unsub	2/4/2011	10/2/2011	10/17/2016	1842	1.00%			\$0.00
173	367077	\$ 15.00	DL Unsub	2/4/2011	10/2/2011	10/17/2016	1842	1.00%			\$1.00
174	367079	\$ 5.00	DL Unsub	2/4/2011	10/2/2011	10/17/2016	1842	1.00%			\$0.00
175	367088	\$ 15.00	DL Unsub	2/4/2011	10/2/2011	10/17/2016	1842	1.00%			\$1.00
176	370330	\$ 6.00	DL Unsub	3/11/2011	11/6/2011	10/17/2016	1807	1.00%			\$0.00
177	370557	\$ 10.00	DL Unsub	3/16/2011	11/11/2011	10/17/2016	1802	1.00%			\$0.00
194	387896	\$ 10.00	DL Sub	9/14/2011	5/11/2012	10/17/2016	1620	1.00%			\$0.00
195	390660	\$ 2,528.00	DL Sub	10/12/2011	6/8/2012	10/17/2016	1592	1.00%			\$110.00
196	391172	\$ 46.00	DL Sub	10/17/2011	6/13/2012	10/17/2016	1587	1.00%			\$2.00
197	461418	\$ 970.00	DL Sub	11/1/2012	6/29/2013	10/17/2016	1206	1.00%			\$32.00
198	466476	\$ 10.00	DL Sub	2/1/2012	9/28/2012	10/17/2016	1480	1.00%			\$0.00
199	466584	\$ 15.00	DL Sub	2/1/2012	9/28/2012	10/17/2016	1480	1.00%			\$1.00
200	467310	\$ 15.00	DL Sub	2/15/2012	10/12/2012	10/17/2016	1466	1.00%			\$1.00
204	384981	\$ 41.00	DL Unsub	8/22/2011	4/18/2012	10/17/2016	1643	1.00%			\$2.00
205	387748	\$ 15.00	DL Unsub	9/14/2011	5/11/2012	10/17/2016	1620	1.00%			\$1.00
206	387753	\$ 5.00	DL Unsub	9/14/2011	5/11/2012	10/17/2016	1620	1.00%			\$0.00
207	387757	\$ 5.00	DL Unsub	9/14/2011	5/11/2012	10/17/2016	1620	1.00%			\$0.00
208	387796	\$ 31.00	DL Unsub	9/14/2011	5/11/2012	10/17/2016	1620	1.00%			\$1.00
209	387804	\$ 5.00	DL Unsub	9/14/2011	5/11/2012	10/17/2016	1620	1.00%			\$0.00
210	387895	\$ 15.00	DL Unsub	9/14/2011	5/11/2012	10/17/2016	1620	1.00%			\$1.00
211	387963	\$ 5.00	DL Unsub	9/14/2011	5/11/2012	10/17/2016	1620	1.00%			\$0.00
212	387984	\$ 15.00	DL Unsub	9/14/2011	5/11/2012	10/17/2016	1620	1.00%			\$1.00
213	387997	\$ 70.00	DL Unsub	9/14/2011	5/11/2012	10/17/2016	1620	1.00%			\$3.00
214	388033	\$ 5.00	DL Unsub	9/14/2011	5/11/2012	10/17/2016	1620	1.00%			\$0.00
215	388087	\$ 5.00	DL Unsub	9/14/2011	5/11/2012	10/17/2016	1620	1.00%			\$0.00
216	388141	\$ 5.00	DL Unsub	9/14/2011	5/11/2012	10/17/2016	1620	1.00%			\$0.00
217	388189	\$ 5.00	DL Unsub	9/14/2011	5/11/2012	10/17/2016	1620	1.00%			\$0.00
218	388193	\$ 10.00	DL Unsub	9/14/2011	5/11/2012	10/17/2016	1620	1.00%			\$0.00
219	389829	\$ 197.00	DL Unsub	9/27/2011	5/24/2012	10/17/2016	1607	1.00%			\$9.00
220	391031	\$ 5.00	DL Unsub	10/12/2011	6/8/2012	10/17/2016	1592	1.00%			\$0.00
221	391032	\$ 15.00	DL Unsub	10/12/2011	6/8/2012	10/17/2016	1592	1.00%			\$1.00
222	398351	\$ 387.50	DL Unsub	12/7/2011	8/3/2012	10/17/2016	1536	1.00%			\$16.00
223	398803	\$ 37.00	DL Unsub	10/12/2011	6/8/2012	10/17/2016	1592	1.00%			\$2.00
224	464205	\$ 252.00	DL Unsub	11/1/2012	6/29/2013	10/17/2016	1206	1.00%			\$8.00
225	465758	\$ 648.00	DL Unsub	1/30/2012	9/26/2012	10/17/2016	1482	1.00%			\$26.00
226	466050	\$ 15.00	DL Unsub	2/1/2012	9/28/2012	10/17/2016	1480	1.00%			\$1.00
227	466100	\$ 15.00	DL Unsub	2/1/2012	9/28/2012	10/17/2016	1480	1.00%			\$1.00
228	466184	\$ 5.00	DL Unsub	2/1/2012	9/28/2012	10/17/2016	1480	1.00%			\$0.00
229	466300	\$ 15.00	DL Unsub	2/1/2012	9/28/2012	10/17/2016	1480	1.00%			\$1.00
230	466303	\$ 15.00	DL Unsub	2/1/2012	9/28/2012	10/17/2016	1480	1.00%			\$1.00
231	466369	\$ 40.00	DL Unsub	2/1/2012	9/28/2012	10/17/2016	1480	1.00%			\$2.00
232	466405	\$ 15.00	DL Unsub	2/1/2012	9/28/2012	10/17/2016	1480	1.00%			\$1.00
233	466421	\$ 20.00	DL Unsub	2/1/2012	9/28/2012	10/17/2016	1480	1.00%			\$1.00
234	466448	\$ 15.00	DL Unsub	2/1/2012	9/28/2012	10/17/2016	1480	1.00%			\$1.00
235	466466	\$ 10.00	DL Unsub	2/1/2012	9/28/2012	10/17/2016	1480	1.00%			\$0.00
236	466595	\$ 5.00	DL Unsub	2/1/2012	9/28/2012	10/17/2016	1480	1.00%			\$0.00
237	466681	\$ 163.00	DL Unsub	2/6/2012	10/3/2012	10/17/2016	1475	1.00%			\$7.00
238	467987	\$ 5.00	DL Unsub	2/24/2012	10/21/2012	10/17/2016	1457	1.00%			\$0.00
239	469565	\$ 10.00	DL Unsub	3/8/2012	11/3/2012	10/17/2016	1444	1.00%			\$0.00
240	472799	\$ 23.00	DL Unsub	3/12/2012	11/7/2012	10/17/2016	1440	1.00%			\$1.00
241	473548	\$ 36.00	DL Unsub	4/2/2012	11/28/2012	10/17/2016	1419	1.00%			\$1.00
242	474429	\$ 5.00	DL Unsub	5/7/2012	1/2/2013	10/17/2016	1384	1.00%			\$0.00
247	385076	\$ 498.00	DL Sub	8/22/2011	4/18/2012	10/17/2016	1643	1.00%			\$22.00
252	482456	\$ 6.00	DL Sub	9/18/2012	5/16/2013	10/17/2016	1250	1.00%			\$0.00
253	477332	\$ 5.00	DL Sub	8/1/2012	3/29/2013	10/17/2016	1298	1.00%			\$0.00
254	481481	\$ 10.00	DL Sub	9/7/2012	5/5/2013	10/17/2016	1261	1.00%			\$0.00
255	481577	\$ 10.00	DL Sub	9/7/2012	5/5/2013	10/17/2016	1261	1.00%			\$0.00
256	481840	\$ 26.00	DL Sub	9/7/2012	5/5/2013	10/17/2016	1261	1.00%			\$1.00
257	483396	\$ 26.00	DL Sub	9/28/2012	5/26/2013	10/17/2016	1240	1.00%			\$1.00
258	488192	\$ 656.60	DL Sub	11/12/2012	7/10/2013	10/17/2016	1195	1.00%			\$21.00

