July 17, 2014

Dr. Jack Lassiter
Chancellor
University of Arkansas at Monticello
140 University Drive
Monticello, AR 71656

Certified Mail
Return Receipt Requested
7012 3460 0003 2479 4671

RE: Final Program Review Determination
OPE ID: 00108500
PRCN: 201420628560

Dear Dr. Lassiter:

The U.S. Department of Education’s (Department’s) Dallas School Participation Division issued a program review report on June 10, 2014 covering the University of Arkansas at Monticello’s (UAM’s) 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 2012-2013 and 2013-2014 award years. The institution’s final response was received on July 9, 2014.

The Dallas School Participation Division has reviewed UAM’s response to the Program Review Report. A copy of the program review report (and related attachments) and UAM’s response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by UAM 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.

UAM’s response has resolved all findings. In addition UAM has provided assurances that the appropriate corrective actions have been taken to resolve and prevent future occurrences of all findings. Therefore, UAM may consider the program review closed with no further action required.

Program records relating to the period covered by this program review must be retained until the later of: the resolution of the loan(s), claim(s) or expenditure(s) questioned in the program review [34 C.F.R. § 668.24(e)(3)(i)] or the end of the retention period applicable to the record [34 C.F.R. § 668.24(e)(1) and (e)(2)].
If you have any questions please call Ms. Shereé Porter at 214-661-9576.

Sincerely,

Cynthia Thornton, Director
Dallas School Participation Division

Enclosure: Program Review Report (with attachments)
UAM’s Response to the Program Review Report

cc: Susan Brewer, Financial Aid Administrator
Arkansas Department of Higher Education
North Central Association of Colleges and Schools, the Higher Learning Commission
Council on Occupational Education
June 10, 2014

Dr. Jack Lassiter  
Chancellor  
University of Arkansas at Monticello  
140 University Drive  
Monticello, AR 71656

Certified Mail  
Return Receipt Requested  
7012 2920 0001 6930 0051

RE: Program Review Report  
OPE ID: 00108500  
PRCN: 2014200628560

Dear Dr. Lassiter:

From March 24, 2014 through March 28, 2014, Ms. Shereé Porter and Mr. Bruce Anderson conducted a review of the University of Arkansas at Monticello’s (UAM’s) administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). The findings of that review are presented in the enclosed report.

Findings of noncompliance are referenced to the applicable statutes and regulations and specify the action required to comply with the statute and regulations. Please review the report and respond to each finding, indicating the corrective actions taken by UAM. The response should include a brief, written narrative for each finding that clearly states UAM’s position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, UAM must provide supporting documentation as required in each finding.

Please note that pursuant to HEA section 498A(b), the Department is required to:

1. provide to the institution an adequate opportunity to review and respond to any preliminary program review report and relevant materials related to the report before any final program review report is issued;
2. review and take into consideration an institution’s response in any final program review report or audit determination, and include in the report or determination –
   a. A written statement addressing the institution’s response;
   b. A written statement of the basis for such report or determination; and
   c. A copy of the institution’s response.

1 A "preliminary" program review report is the program review report. The Department’s final program review report is the Final Program Review Determination (FPRD).
The Department considers the institution’s response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution’s written response will not be attached to the FPRD. However, it will be retained and available for inspection by UAM upon request. -Copies of the program review report, the institution’s response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after the FPRD is issued.

The institution’s response should be sent directly to Ms. Shereé Porter of this office within 30 calendar days of receipt of this letter.

Protection of Personally Identifiable Information (PII):
PII is any information about an individual which can be used to distinguish or trace an individual’s identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the findings in the attached report do not contain any student PII. Instead, each finding references students only by a student number created by Federal Student Aid. The student numbers were assigned in Appendix A, Student Sample. The appendix was encrypted and sent separately to the institution via e-mail. Please see the enclosure Protection of Personally Identifiable Information for instructions regarding submission to the Department of required data / documents containing PII.

Record Retention:
Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

We would like to express our appreciation for the courtesy and cooperation extended during the review. Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact Ms. Shereé Porter at 214-661-9576 or sheree.porter@ed.gov.

Sincerely,

Kim Peeler
Compliance Manager

cc: Susan Brewer, Financial Aid Administrator

Enclosures:
Program Review Report
Protection of Personally Identifiable Information
Appendix A (sent via e-mail)
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 or on media (e.g., CD-ROM, floppy disk, DVD) 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 WinZip 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 files and media 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.
Program Review Report
June 10, 2014
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A. Institutional Information

University of Arkansas at Monticello
140 University Drive
Monticello, AR 71656

Type: Public

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

Accrediting Agency: North Central Association of Colleges and Schools - CIHE (Higher Educ)
Council on Occupational Education (COE)

Current Student Enrollment: 3,538 (Spring 2013)

% of Students Receiving Title IV: 60.88% (2012-2013)

Title IV Participation (PEPS Funding):

<table>
<thead>
<tr>
<th>Program</th>
<th>2012-2013</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal Pell Grant Program</td>
<td>$9,433,977</td>
</tr>
<tr>
<td>William D. Ford Loan Program (Subsidized)</td>
<td>$7,090,952</td>
</tr>
<tr>
<td>William D. Ford Loan Program (Unsubsidized)</td>
<td>$7,216,378</td>
</tr>
<tr>
<td>William D. Ford Loan Program (PLUS)</td>
<td>$117,507</td>
</tr>
<tr>
<td>Federal Supplemental Educational Opportunity Grant</td>
<td>$120,469</td>
</tr>
<tr>
<td>Federal Work Study</td>
<td>$184,822</td>
</tr>
</tbody>
</table>

Default Rate FFEL/DL:

<table>
<thead>
<tr>
<th>Year</th>
<th>Default Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>2011</td>
<td>18.1%</td>
</tr>
<tr>
<td>2010</td>
<td>19.7%</td>
</tr>
<tr>
<td>2009</td>
<td>20.1%</td>
</tr>
</tbody>
</table>

Default Rate Perkins:

<table>
<thead>
<tr>
<th>Date</th>
<th>Default Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>6/30/2012</td>
<td>37.3%</td>
</tr>
<tr>
<td>6/30/2011</td>
<td>32.0%</td>
</tr>
<tr>
<td>6/30/2010</td>
<td>35.8%</td>
</tr>
</tbody>
</table>
B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at University of Arkansas at Monticello (UAM) from March 24, 2014 to March 28, 2014. The review was conducted by Shereé Porter and Bruce Anderson.

The focus of the review was to determine UAM's compliance with the statutes and federal regulations as they pertain to the institution's administration of Title IV programs. The review consisted of, but was not limited to, an examination of UAM'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 30 files were identified for review from the 2012-2013 and 2013-2014 (year to date) award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for the award year. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review.

Disclaimer:

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

This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination letter.

C. Findings

During the review, several areas of noncompliance were noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by AIH to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding 1. Verification Violations

Citation: An institution is responsible for verifying the information that is used to calculate an applicant's Expected Family Contribution (EFC) as part of the determination of need for Title IV, HEA assistance for students who are selected for verification. If an application is selected for verification, an institution must verify (1) adjusted gross income (AGI), (2) U.S. income tax paid, (3) household size, (4) number of household size enrolled in college, and (5) certain
untaxed income. Information is verified by securing additional documentation or, in some cases, a signed statement attesting to the accuracy of the information provided. An institution is also required to verify discrepancies in information received from different sources regarding a student’s application for financial aid under the Title IV, HEA programs. 34 C.F.R. §§ 668.51 through 668.61

Noncompliance: UAM did not properly complete verification for two students (Student #’s 6 and 8) in the 2012-13 award year.

Student #6: The student’s 2011 tax transcript had two fields pertaining to Education Credit. The field entitled “Refundable Education Credit per computer” was used in the verification process instead of the required “Education Credit per computer” field. The amount of the tax credit used in the EFC calculation was $1,000, instead of the correct amount of $1,500. A recalculation performed by the institution, using the correct tax credit, yielded a decrease in the EFC from 1841 to 1734. This decrease in EFC resulted in an increase in the student’s Federal Pell Grant eligibility by $100.

Student #8: The student’s 2011 tax transcript contained two fields for adjusted gross income: “Adjusted Gross Income” and “Adjusted Gross Income per computer”. UAM should have used the “Adjusted Gross Income per computer” field of $10,990 instead of the “Adjusted Gross Income” field of $11,378 to complete the verification process. However, the EFC for this student was 0, and the change would not have resulted in a change to the EFC or the student’s award. Therefore, no further action is required for this student.

Required Action: During the review, UAM recalculated the EFC for student #6 and awarded the student an additional $100 in institutional aid to make up for the amount of Federal Pell Grant funds the student should have received. Because these were isolated incidences, no further action is required.

Finding 2. FSEOG - Funds Not Made Reasonably Available/Selection Policy Inadequate

Citation: An institution shall pay in each payment period a portion of an FSEOG awarded for a full academic year. (2) The institution shall determine the amount paid each payment period by the following fraction:

\[
\frac{\text{FSEOG}}{N}
\]

where:

\[
\text{FSEOG} = \text{the total FSEOG awarded for an academic year and } N = \text{the number of payment periods that the institution expects the student will attend in that year. 34 C.F.R § 676.16(a)}
\]

Noncompliance: According to UAM’s award policy, students who are Federal Pell Grant recipients and have a zero EFC are selected as Federal Supplemental Educational Opportunity
Grant (FSEOG) recipients. However, UAM’s procedure for awarding FSEOG funds is to reserve the funds for students enrolled in the summer term only. Students enrolled in the fall and/or spring are not awarded FSEOG funds.

**Required Action:** UAM must revise its current FSEOG awarding policy to ensure funds are made available to eligible students for the payment periods the institution expects the student will attend in that award year. A copy of the revised FSEOG policy must be submitted with the institution’s response to the program review report.

**Finding 3. Incorrect/Late Enrollment Status Reporting**

**Citation:** An institution participating in the Title IV programs must have some arrangement to report student enrollment data to the national Student Loan Data System (NSLDS). Student 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:** Enrollment status reporting was inaccurate and untimely for Student #9. The student’s last date of attendance (LDA) was 3/04/2013 (unofficial withdraw); however, NSLDS shows a withdrawal date of 5/07/2013 and a certification date of 9/26/2013.

**Required Action:** UAM must update NSLDS with the correct enrollment information for student #9 and submit a copy of the NSLDS reporting screen that reflects the correct entry. In addition, UAM must review its current policies and procedures to ensure a student’s enrollment status is properly reported. A copy of the policy must be submitted with the institution’s response to the program review report.

**D. Appendix**

Appendix A (Student Sample) contains personally identifiable information and will be emailed to UAM 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.
Appendix A – Student Sample

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Finding: Verification Violations

The University concurs with the Department's finding. No further action was required.

Finding 2: FSEOG Funds Not Made Reasonably Available/Selection Policy Inadequate

In 2012-13, the University established a policy of reserving FSEOG funds for use during the summer term. This allowed many students to receive funding for the summer term who would not have had any funds available for use in the summer.

Effective with the 2014-15 award year, the University has revised the FSEOG award policy to make awards available to eligible students during the fall and spring terms. The revised policy is included as Attachment A.

Finding 3: Incorrect/Late Enrollment Status Reporting

The institution has written policies and procedures regarding enrollment status reporting. The current policy is included as Attachment B.

The enrollment record of Student #9 has been updated to reflect the unofficial withdrawal date of 3/4/13. See Attachment C.
Attachment A

Awarding Procedures 2014-15

Financial Need is determined by using the following calculation:

Federal Year COA less Prorated EFC equals Federal Need. This information is on the Need Summary page in WeevilNet.

<table>
<thead>
<tr>
<th>Need Summary by Award Period</th>
<th>Fed</th>
<th>FedNeed. COA</th>
<th>Prorated EFC</th>
<th>Federal Pell</th>
<th>Federal FSEOG</th>
<th>Pell Grant (Fed)</th>
<th>Federal Direct Stafford (Fed)</th>
<th>Net Aid (Fed)</th>
<th>Special Need Cost Aid (Fed)</th>
<th>Fed Aid (Fed)</th>
<th>Total Aid (Fed)</th>
<th>Unmet Need (Fed)</th>
<th>Unmet COA (Fed)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Award Period</td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
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<tr>
<td>Academic Year</td>
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<td></td>
</tr>
<tr>
<td>Fall</td>
<td></td>
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<td></td>
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<td></td>
</tr>
<tr>
<td>Spring</td>
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<td></td>
</tr>
<tr>
<td>Total</td>
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<td></td>
<td></td>
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</tr>
</tbody>
</table>

Student files that have been marked as Review Status Complete are ready for packaging. Most students are auto-packaged. Awards initially packaged are: Pell Grants, FSEOG and Federal Direct Stafford Loans. Initial Pell Grant awards are made based on full-time enrollment, unless the student is enrolled for the term being packaged. If the student is enrolled for the term being packaged, the Pell Grant award for that term is calculated at the actual enrollment status. To be selected as an FSEOG recipient, a student must have a zero EFC and also be a Pell Grant recipient. FSEOG award amounts are $250 for Fall and $250 for Spring. Loans are packaged up to the Cost of Attendance/Loan Limits based on the student's grade level at the time of packaging. Transfer students will be packaged at the freshman loan limit if transfer hours have not yet been determined. Any aid which is known at the time of packaging is considered as estimated financial aid to be used in determining unmet need.

After packaging, all students are mailed an award letter. Grant awards are accepted at the time of packaging. Loans must be accepted by the student before they will be processed. The student must indicate acceptance of the award, and sign and date the award letter for loan origination to begin.

Students wishing to apply for PLUS Loans must complete the PLUS Loan process at www.studentloans.gov.
Loan limits and grade level progression are shown below:

<table>
<thead>
<tr>
<th>Annual Loan Limits</th>
<th>Subsidized</th>
<th>Total (Subsidized and Unsubsidized)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Dependent Undergraduates</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>First Year (1-29 hours)</td>
<td>$3,500</td>
<td>$5,500</td>
</tr>
<tr>
<td>Second Year (30-59 hours)</td>
<td>$4,500</td>
<td>$6,500</td>
</tr>
<tr>
<td>Third Year and Higher (60+ hours)</td>
<td>$5,500</td>
<td>$7,500</td>
</tr>
<tr>
<td><strong>Independent Undergraduates and Dependent Undergraduates whose parents are unable to obtain a PLUS Loan</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>First year (1-29 hours)</td>
<td>$3,500</td>
<td>$9,500</td>
</tr>
<tr>
<td>Second Year (30-59 hours)</td>
<td>$4,500</td>
<td>$10,500</td>
</tr>
<tr>
<td>Third Year and Higher (60+ hours)</td>
<td>$5,500</td>
<td>$12,500</td>
</tr>
<tr>
<td><strong>Graduate Students</strong></td>
<td>$0</td>
<td>$20,500</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Aggregate Loan Limits</th>
<th>Subsidized</th>
<th>Total (Subsidized and Unsubsidized)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Dependent Undergraduates</strong></td>
<td>$23,000</td>
<td>$31,000</td>
</tr>
<tr>
<td><strong>Independent Undergraduates and Dependent Undergraduates whose parents are unable to obtain a PLUS Loan</strong></td>
<td>$23,000</td>
<td>$57,500</td>
</tr>
<tr>
<td><strong>Graduate Students</strong></td>
<td>$65,500</td>
<td>$138,500</td>
</tr>
</tbody>
</table>

Work study awards are not made until a student finds a job on campus. Students are limited to working 20 hours per week. Special approval may be granted by Vice-Chancellors or the Chancellor in limited situations for a student to exceed 20 hours per week. Upon hiring a student, the hiring department submits a Work-Study Transmittal Form to the Financial Aid Office. The Financial Aid Office certifies that the student is eligible for work-study and insures that all required payroll documents have been completed prior to certifying a student as eligible for work. The Personnel/Payroll Office sets up the student's electronic timesheet and sends an email to the student with instructions on how to enter their time electronically. Time should be reported on a weekly basis by student employees. After submission of their time electronically, their supervisor receives an email notifying that student time is available for approval. Students are paid once a month for the hours they worked the previous month.
Steps to follow when auto packaging

FA Term - Build FA Term to update to most recent data
Create FA Term Driver Records: Main Menu > Financial Aid > FA Term > Create FA Term Driver Records
Build FA Terms in Batch: Main Menu > Financial Aid > FA Term > Build FA Term in Batch

SAP Update to Meet - Update SAP status for new students from Undetermined to Meets
Path: Set Up SACR > Utilities > Population Update > Population Update Process

Assign Budgets
Maintain: Main Menu > Financial Aid > Budgets > Assign Budgets > Maintain Budget Work Table
Select: Main Menu > Financial Aid > Budgets > Assign Budgets > Select Students
Process Formula: Main Menu > Financial Aid > Budgets > Assign Budgets > Process Formula
Move: Main Menu > Financial Aid > Budgets > Assign Budgets > Move Budget to Students
Maintain: Main Menu > Financial Aid > Budgets > Assign Budgets > Maintain Budget Work Table
Between each step, monitor process by Viewing Batch Budget Details


Package One Term
Spring Only Packaging plan is FA_ALL_SPR
Fall Only Packaging plan is FA_ALL_FAL
Pro-Rate EFC for one term
Select Students: Main Menu > Financial Aid > Mass Packaging > Select Students
Assign: Main Menu > Financial Aid > Mass Packaging > Assign Plans

Package All Year
Packaging Plan is FA_ALL
Select Students: Main Menu > Financial Aid > Mass Packaging > Select Students
Assign: Main Menu > Financial Aid > Mass Packaging > Assign Plans
Process Live: Main Menu > Financial Aid > Mass Packaging
Process Mass Packaging (choose live)

Assign Award Letters (FA0) or FAS
Run 3 C Engine
Institution
Aid Year
Batch Sequence Number
PSNT Server
Communication Generation (FAO or FAS)
  file path: \UAMFINAID\FA_PRINT\enter file name
  PSNT Server
  Retrieve Letters (O:\FA_Print)
  Print 2 copies, unmark collate
  Move to FA_Print Archive folder after printing
Attachment B

Enrollment Reporting Process

Enrollment data is submitted to the National Student Clearinghouse as follows:

Fall and Spring semesters

1st submission - soon after the 11th class day, usually within 5 business days
2nd submission – approximately one month after the 1st submission
3rd submission – approximately one month after the 2nd submission
4th submission – soon after final grades are posted, usually within 5 business days

Summer terms

1st submission – soon after the 5th class day of the first summer session, usually within 3 business days
2nd submission – soon after final grades for the first summer session are posted, usually within 5 business days
3rd submission – soon after the 5th class day of the second summer session, usually within 3 business days
4th submission – soon after final grades for the second summer session are posted, usually within 5 business days

A graduate file is sent to the National Student Clearinghouse at the end of each fall, spring, and summer term.

After the enrollment file has been created, the Financial Aid Director submits the file to NSLC.

NSLDS will be manually updated when a student officially withdraws. The official withdrawal date will be used. The update will be made within 30 days of the student’s withdrawal.

NSLDS will be manually updated when it is determined that a student is an unofficial withdrawal. The midpoint of the term will be used as the withdrawal date. The update will be made within 30 days of the date of determination that the student is an unofficial withdrawal.

Any errors which occur when the file has been sent to the National Student Clearinghouse will be corrected by the Registrar’s Office.