



COLLEGE
OF THE
REDWOODS

February 26, 2015

Ms. Marisol Nealon
Federal Student Aid
United States Department of Education
50 Beale Street, Suite 9800
San Francisco, California 94105

Re: Program Review Report
OPE ID: 00118500
PRCN: 201440928704

Dear Ms. Nealon:

Please find enclosed the response of College of the Redwood to the
September 30, 2014 Program Review Report (OPE ID: 00118500/PRCN:
201440928704).

Sincerely,

Kathryn G. Smith
President/Superintendent

Enclosures

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Re: Program Review Report
OPE ID: 00118500
PRCN: 201440928704

Dear Ms. Nealon:

On behalf of the College of the Redwoods ("COTR" or the "College"), I respectfully submit this response to the September 30, 2014 Program Review Report ("PRR") (OPE ID: 00118500/PRCN: 201440928704).

Introduction

The College takes its federal and state responsibilities very seriously. We are a small college with numerous demands on our limited resources, but we take great pride in our institution and seek to provide our students, employees, and community with excellence in all that we do.

From July 14, 2014 through July 18, 2014, you and Adeline Espinosa conducted a review of the College'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. Prior to the review, College staff had not fully anticipated all of the subjects which were raised during the review and so were not always in a position to provide full information in response to your inquiries. In addition, the College had recently undergone a restructuring of some positions and some staff members did not have all of the institutional knowledge relevant to their new positions. In light of this, we have included information in this response to fill any gaps that may have existed at the time of your on-campus review.

During the review and our preparation for the review, the College recognized difficulties in some areas. We immediately took action to improve in those areas and resolve any issues. For example, in January 2015, College personnel attended a multi-day training on the Clery Act offered by the Clery Center and all College employees and residential assistants who have been designated as a Campus Security Authority (CSA) completed an online Campus Security Authority training program in February 2015. In addition, we have critically reviewed our procedures and practices and updated them as necessary to ensure compliance with the law.

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I. Finding #1. Campus Crime Requirements Not Met — Required Policy Statements Omitted from Annual Security Report (ASR) and Failure to Distribute the ASR as a Comprehensive Document

a. Information Regarding COTR's Compliance Prior to the Audit

In 2013, the College compiled crime statistics as required by the Clery Act and its implementing regulations. The College reported these statistics to the Department of Education in 2013 as required. In addition, the College provided a link on its website to the statistics through the Department of Education's website and the College's Board Policies and Administrative Procedures also have been available online since prior to the audit. The College also included crime statistics and policy and procedure information in its Catalog, pages 160-162, (EX-1). We regret that we did not provide all of the relevant information to the audit team during the review. For example, the College should have provided copies of the relevant Board Policies, Administrative Procedures, crime reporting, and emergency information (*Ref.* EX-1). However, the College did not distribute a complete stand-alone Annual Security Report ("ASR") in 2013 for the 2010-2012 years. COTR has revisited its Clery Act obligations and has taken the necessary steps to ensure that any past concerns do not recur.

The audit review team presented a broad verbal narrative of its findings to the College on July 18, 2014, and the College received the audit team's Program Review Report on September 30, 2014. Prior to receiving the Program Review Report, COTR prepared an ASR for 2011-2013 to comply with its Clery Act obligations. This ASR contained most of the information that was noted as being missing from the ASR in the Program Review Report. The ASR for 2011-2013 was published on October 1, 2014, demonstrating COTR's commitment to filing a timely report that was as accurate as possible.

The College distributed the 2011-2013 ASR with policy, procedural, and statistical information on October 1, 2014. On October 1, 2014 at 8:52 a.m., the College sent an email to all COTR students telling them of the availability of the report, a description of the contents, and the direct link to that report (EX-2). On October 1, 2014 at 12:31 p.m., the College sent an email to all COTR employees telling them of the availability of the report, a description of the contents, and the direct link to that report (EX-3). In addition, the ASR is available in full online at <http://www.redwoods.edu/safety/Clery.asp> and a hardcopy of the ASR is available from the Public Safety Department upon request. A full copy of the ASR for 2011-2013 is included with the response (EX-4). The College also submitted its crime statistics to the Department for inclusion in the Office of Postsecondary Education's "Campus Safety and Security Data Analysis Cutting Tool." COTR is currently preparing its ASR for 2012-2014 for distribution by October 1, 2015, as discussed in more detail below.

b. COTR Has Taken the Actions Required by the Department in the PRR

- i. COTR Has Reviewed its Policies and Created New Policies and Procedures Regarding the Preparation, Publication, and Distribution of the ASR

As directed in the Program Review Report, the College has revised its internal policies and procedures that govern the preparation, publication, and distribution of the ASR. The College

implemented Board Policy (“BP”) and Administrative Procedure (“AP”) 3515, Crime Reporting, which outline the preparation, publication, and distribution of the ASR (EX-5). BP and AP 3515 ensure that the College’s complete ASR will be prepared, published, and distributed in an accurate and timely manner.

In addition, COTR undertook a comprehensive review of its security-related policies and procedures. The College revised and developed and implemented numerous policies and procedures that relate to the ASR and campus security. The College’s review is discussed below in Section 1c.ii.(page 5) of this response.

ii. COTR Has Provided a Published ASR for 2011-2013 and a Draft ASR for 2012-2014

As discussed above, prior to receiving the Program Review Report, the College prepared its ASR for the 2011-2013 years. The College published this ASR one day after receiving the Program Review Report. COTR actively distributed the ASR to all students and employees, as outlined above in Section 1a. (pg. 2) of this response (*Ref. EX-2, EX-3, EX-4*).

Using its new and revised policies as a guide, COTR has prepared a draft ASR for the 2012-2014 years that includes all of the required statistical disclosures, policy, procedure, and programmatic information (EX-6). If the Department has any concerns with the draft ASR, or suggests any changes to the draft, please notify us so that we may revise the ASR as necessary before it is published in October 2015. We are committed to continuous quality improvement in the Clery Act report.

In the letter requesting clarification and additional time for the response, the College sought clarification regarding the required action for Findings #1 and 2 specifically. As directed in the Program Review Report, the College is to prepare an accurate and complete ASR, and distribute it to current students and employees. However, the Program Review Report also indicates that only “a draft ASR” must accompany the College’s response. The College asked whether this language means that a draft ASR is satisfactory, and that the College would later finalize the ASR and effect the required distributions. The College did not receive a response to this request for clarification. Therefore, the College has included the ASR for 2011-2013 (*Ref. EX-4*) published on October 1, 2014, as well as a draft of the ASR for 2012-2014 (*Ref. EX-6*).

iii. Certification Statement of Compliance

The Program Review Report required COTR to provide a “certification statement attesting to the fact that the [ASR] materials were distributed in accordance with the Clery Act.” This constitutes that certification.

The College distributed the 2011-2013 ASR with policy, procedural, and statistical information on October 1, 2014. On October 1, 2014 at 8:52 a.m., the College sent an email to all COTR students telling them of the availability of the report, a description of the contents, and the direct link to that report (*Ref. EX-2*). On October 1, 2014 at 12:31 p.m., the College sent an email to all COTR employees telling them of the availability of the report, a description of the contents, and the direct link to that report (*Ref. EX-3*) In addition, the ASR is available in full online at <http://www.redwoods.edu/safety/Clery.asp> and a hardcopy of the ASR is available from the Public Safety Department upon request. A full

copy of the ASR for 2011-2013 is included with the response (*Ref. EX-4*). The College also submitted its crime statistics to the Department for inclusion in the Office of Postsecondary Education's "Campus Safety and Security Data Analysis Cutting Tool."

The College's ASR for 2012-2014 will include all new and updated policies, procedures, and programmatic information such that the ASR for 2012-2014 will be an accurate and complete ASR.

COTR understands its Clery Act obligations. COTR also understands the importance of compliance with its Clery Act obligations. COTR has taken all necessary corrective actions to ensure that it will publish and distribute an accurate and complete ASR in the manner required by federal regulations.

c. COTR's Additional Corrective Actions to Address the Department's Concerns and Changes to Regulations

i. COTR Devoted Staff Resources to Clery Act Compliance

Beginning January 2013, the Public Safety Department, through a Lead Public Safety Officer, reported to the Director of Auxiliary Programs. During 2013, the Director of Auxiliary Programs recommended that a manager should be employed to oversee this department. In early 2014, prior to the audit, the College reviewed its compliance with the Clery Act and identified areas for improvement. Subsequently, the Director of Auxiliary Programs participated in a Clery Center training in June 2014. In July 2014, COTR appointed a Director of Public Safety to oversee the Public Safety Department and to focus on the Clery Act. The Director reviewed the findings of the Audit Team and began working on an ASR covering the years 2011-2013 along with reviewing the policies and procedures. The Director and other College personnel have committed significant time and energy to ensuring compliance with the Clery Act.

Additionally, as evidence of COTR's commitment to making sure all Clery-related policies and procedures are in place, the College is hiring a Public Safety Manager. One of the Public Safety Manager's main focuses will be compliance with the Clery Act.

The College has identified its Campus Security Authorities. All Campus Security Authorities have completed an online Campus Security Authority training program. The training program was offered through D. Stafford and Associates, a consulting firm specializing in campus safety and security and Clery Act compliance. Going forward, the Director of Public Safety or designee will notify Campus Security Authorities of their obligations each year. The Director of Public Safety or designee will provide necessary training for Campus Security Authorities and will review crime reports submitted by Campus Security Authorities.

After publishing the ASR for 2011-2013, we made even further commitments to increasing our expertise. The Director of Public Safety and the Vice President of Instruction and Student Development attended a Clery Act training in Palm Desert January 12-13, 2015. The Public Safety Director has also attended several webinar-based training sessions to get more experience and expertise in preparing a complete ASR.

ii. COTR Reviewed and Updated Its Policies and Procedures

After receiving the verbal report from the audit committee in July 2014, COTR continued with a comprehensive review of our policies and procedures related to the ASR. As part of this review, COTR considered the final regulations that were published on October 20, 2014 to implement changes made to the Clery Act by the Violence Against Women Reauthorization Act of 2013. The College took this opportunity to review and update its Board Policies (“BP”) and Administrative Procedures (“AP”) in light of the audit as well as the new regulations. As a result of the College’s proactive and thorough review of its policies and procedures, the following policies and procedures have been written or revised and are now implemented:

- BP and AP 3501 Campus Security and Access
- BP and AP 3504 Missing Student Notification
- BP and AP 3505 District Response to Emergency Situations
- BP and AP 3506 Timely Warnings
- BP and AP 3515 Crime Reporting (includes annual disclosure of crime statistics)
- BP and AP 3516 Registered Sex Offender Information
- BP and AP 3507 Fire Safety
- BP and AP 3520 Local Law Enforcement
- BP and AP 3540 Student Sexual Assault and Sexual Misconduct
- BP 3550 Drug-Free Environment and Drug Prevention Program
- AP 3560 Alcoholic Beverages on Campus
- BP 5500 Standards of Student Conduct / Student Conduct Code and Disciplinary Procedures
- AP 5502 Student Sexual Misconduct and Sexual Violence

Copies of the amended or new BPs and APs are attached (EX-7).

The College also has reviewed and is in the process of updating existing, and entering new, memoranda of understanding with local law enforcement to better clarify the College’s and local law enforcement agencies’ responsibilities.

iii. COTR Clarified the Process for Publication of the ASR

The new or amended policies and procedures touch upon many issues related to the ASR. BP and AP 3515 address the ASR and its distribution specifically. The College will follow BP and AP 3515 to ensure that the complete and accurate ASR is published in accordance with legal requirements so that students, employees, prospective students and employees, and others will have ready access to safety information.

As mentioned above, the College’s ASR was published on October 1, 2014. All students along with all employees received email notification of the availability of the report.

iv. COTR is Improving Its ASR for 2012-2014 Forward

Work is now in progress on the report for the ASR covering the years 2012-2014. We are in the process of further updating the 2015 ASR report to include even more detail and add clarifying language in several areas.

Prior to the Program Review Report, the College purchased new crime reporting software to allow

for more comprehensive reporting and easier capture of the data

The College has attached the current draft of its ASR for 2012-2014 (*Ref. EX-6*). If the Department has any concerns with the draft ASR, or suggests any changes to the draft, please notify us so that we may revise the ASR as necessary before it is published in October 2015. We are committed to continuous quality improvement in the Clery Act report.

II. Finding #2. Fire Safety Requirements Not Met

a. Information Regarding COTR's Compliance

i. Prior Year AFSRs

Regrettably, COTR did not publish its Annual Fire Safety Report ("AFSR") in 2013, or in 2011-2012. However, COTR did publish an AFSR in 2010 (EX-8). It appears that there has been a misunderstanding about the fact that an AFSR must be published each year regardless of whether any fires occurred. Although COTR did not publish an AFSR in recent years, it has substantially complied with many requirements relating to the AFSR. Though the College had most of the necessary information, it was not in a single location. As discussed below, the College now has compiled fire safety information in one place for ease of reference by students and others. COTR has taken the necessary steps to ensure that any past concerns do not recur.

College of the Redwoods Residential Life has been maintaining a Fire Log since 2009 to the present (EX-9). The Fire Log contains all fire alarm incidents and fire drills. The Fire Log was maintained in a paper form only until October 16, 2013 when all of the logs were transcribed into a Residence Hall database. Logs are now maintained in both a paper form and electronic form.

The Fire Logs show that there have been no fires at the College of Redwoods Residence Halls in either Mendocino Hall or Del Norte Hall for the time period the Logs have been maintained – since 2009. Therefore there have been no causes of fires, no injuries due to fires, no deaths due to fire, and no costs associated with building damage due to fire to report.

In 2013, the College compiled fire safety statistics as required by the Clery Act and its implementing regulations. The College reported these statistics to the Department of Education. In addition, the College provided a link on its website to the statistics through the Department of Education's website. The College also distributed fire safety statistics to students in the 2014-15 annual Catalog, page 162, (EX-10). The College of the Redwoods Residence Halls Community Guidelines, (EX-11), along with the Fire Evacuation Protocol Forms (EX-12) and the Federal Emergency Management Agency Get Out and Stay Alive booklets (EX-13) distributed to students, address many of the fire safety disclosures requested by the report. Specifically, these documents which are distributed to residents include information regarding: 1) the use and/or possession of portable electrical appliances; 2) smoking and the use/presence of open flames in student housing facilities; 3) evacuation procedures to be followed in the case of a fire; 4) fire safety education and training programs; and 5) the institutional official(s) and departments to whom students and employees should report the occurrence of fires.

ii. COTR Published its AFSR for 2011-2013 on October 1, 2014

The audit review team presented a broad verbal narrative of its findings to the College on July 18, and the College received the audit team's Program Review Report on September 30, 2014. Prior to receiving the Program Review Report, COTR prepared an AFSR for 2011-2013 to comply with its Clery Act obligations. This AFSR contains most of the information that was noted as being missing from the AFSR in the Program Review Report. The AFSR for 2011-2013 was published on October 1, 2014, demonstrating COTR's commitment to filing a timely report that was as accurate as possible.

The College distributed the 2011-2013 AFSR with policy, procedural, and statistical information on October 1, 2014. The AFSR was prepared, published, and distributed in the same document as the ASR, with the titles of both reports clearly and conspicuously marked on the cover page of the report. On October 1, 2014 at 8:52 a.m., the College sent an email to all COTR students telling them of the availability of the report, a description of the contents, and the direct link to that report (*Ref. EX-2*). On October 1, 2014 at 12:31 p.m., the College sent an email to all COTR employees telling them of the availability of the report, a description of the contents, and the direct link to that report (*Ref. EX-3*). In addition, the AFSR is available in full online at <http://www.redwoods.edu/safety/Clery.asp> and a hardcopy of the AFSR is available from the Public Safety Department upon request. A full copy of the AFSR for 2011-2013 is included with the response (*Ref. EX-4*). The College also submitted its crime statistics to the Department for inclusion in the Office of Postsecondary Education's "Campus Safety and Security Data Analysis Cutting Tool." COTR is currently preparing its AFSR for distribution by October 1, 2015, as discussed in more detail below.

iii. COTR Takes Fire Safety Very Seriously

The College takes fire safety, particularly at the student residence halls, extremely seriously. A key component of fire safety at COTR Residence Halls is training. The College holds regular fire drills so that students and employees will know how to respond in the event of a fire. As recorded in the Fire Log, the College held drills on the following dates:

- Year 2010 – November 16, 2010
- Year 2011 – March 8, 2011 and September 29, 2011
- Year 2012 – April 17, 2012 and September 26, 2012
- Year 2013 – March 26, 2013 and October 2, 2013
- Year 2014 – February 11, 2014 and August 27, 2014
- Year 2015 – January 21, 2015 (next fire drill scheduled for Fall 2015)

Copies of the Fire Log are attached (*Ref. EX-9*).

In addition, resident assistants and office staff receive fire extinguisher training and evacuation training for the Residence Halls. Resident assistants and office staff are also informed of the protocol to follow in the event an alarm sounds in the Residence Halls. This training is provided each year during the two weeks before school starts in the Fall. During both Fall and Spring Opening Day meetings, all students are informed they are required to leave the Residence Halls when the fire alarms sound. Students are informed of all evacuation routes out of the buildings. The College posts evacuation routes on all dormitory room entry doors. Starting Fall 2014, all

residence hall students are given Fire Evacuation Protocol information (*Ref. EX-12*) and FEMA Get Out and Stay Alive brochures (*Ref. EX-13*). Starting Spring 2015, student residents are given maps indicating exits, fire alarm pull stations and fire extinguisher locations for both Mendocino Hall and Del Norte Hall (*EX-14*).

In addition to the training components of fire safety at the Residence Halls, COTR has strict rules to protect student safety. For example, the College has strict rules against open flames, use of incendiary products, and smoking in the residence halls (*Ref. EX-11*).

b. COTR Has Taken the Actions Required by the Department in the PRR

i. COTR Has Reviewed its Policies and Created New Policies and Procedures Regarding the Preparation, Publication, and Distribution of the AFSR and Fire Safety

Before receiving the Program Review Report, the College was already in the process of reviewing its internal policies and procedures that govern the preparation, publication, and distribution of the AFSR and fire safety operations for the College's student residential facilities. The College has developed new policies and procedures regarding fire safety operations and the preparation, publication, and distribution of the AFSR. The College implemented new Board Policy ("BP") and Administrative Procedure ("AP") 3507, Fire Safety, which include information on fire operations and outline the preparation, publication, and distribution of the AFSR (*EX-15*). BP and AP 3507 ensure that the College's complete AFSR will be prepared, published, and distributed in an accurate and timely manner. BP and AP 3507 also set forth fire safety operations information that previously was contained in other internal materials such as the Residence Hall Community Guidelines. Though the College had most of the necessary information, it was not in a single location. Creating BP and AP 3507 ensures that fire safety information is now readily available for viewing. Additionally, students will continue to receive fire safety information through training, Residence Hall Community Guidelines, and the other mechanisms discussed herein.

In addition, COTR reviewed and revised AP 3505 District Response to Emergency Situations in 2013 (*EX-16*).

ii. COTR Has Provided a Published AFSR for 2011-2013 and a Draft ASR for 2012-2014

The College of the Redwoods Residence Halls is working with the Public Safety Department to ensure all statistical information is reported accurately. The Public Safety Department has been given the responsibility to develop and report all fire safety information required in the ASR and the AFSR. College of the Redwoods Residence Halls will collect data for the Fire Log and report it to Public Safety for the AFSR and submission to the U.S. Department of Education.

As discussed above, prior to receiving the Program Review Report, the College prepared its AFSR for the 2011-2013 years. The College published this AFSR one day after receiving the Program Review Report. COTR actively distributed the AFSR to all students and employees, as outlined above in Section 1a. of this response (*Ref. EX-2, EX-3*).

Using its new and revised policies as a guide, COTR has prepared a draft AFSR for the 2012-2014 years that includes all of the required statistical disclosures, as well as policy, procedure, and

programmatic information (*Ref. EX-6*). If the Department has any concerns with the draft AFSR, or suggests any changes to the draft, please notify us so that we may revise the AFSR as necessary before it is published in October 2015. We are committed to continuous quality improvement in the AFSR.

In the letter requesting clarification and additional time for the response, the College sought clarification regarding the required action for Finding #2. As directed in the Program Review Report, the College is to prepare an accurate and complete AFSR, and distribute it to current students and employees. However, the Program Review Report also indicates that “its draft [AFSR]” must accompany the College’s response. The College asked whether to provide a draft AFSR with the response, which the College would later finalize and distribute, or a final AFSR. The College did not receive a response to this request for clarification. Therefore, the College has included the AFSR for 2011-2013 published on October 1, 2014, as well as a draft of the AFSR for 2012-2014 (*Ref. EX-4, EX-6*).

iii. Certification Statement of Compliance

The Program Review Report required COTR to provide a “certification statement attesting to the fact that the [AFSR] materials were distributed in accordance with the Clery Act.” This constitutes that certification.

The College distributed the 2011-2013 AFSR with policy, procedural, and statistical information on October 1, 2014. On October 1, 2014 at 8:52 a.m., the College sent an email to all COTR students telling them of the availability of the report, a description of the contents, and the direct link to that report (*Ref. EX-2*). On October 1, 2014 at 12:31 p.m., the College sent an email to all COTR employees telling them of the availability of the report, a description of the contents, and the direct link to that report. (*Ref. EX-3*) In addition, the AFSR is available in full online at <http://www.redwoods.edu/safety/Clery.asp> and a hardcopy of the AFSR is available from the Public Safety Department upon request. A full copy of the ASFR for 2011-2013 is included with the response (*Ref. EX-4*) The College also submitted its fire safety statistics to the Department for inclusion in the Office of Postsecondary Education’s “Campus Safety and Security Data Analysis Cutting Tool.”

The College’s AFSR for 2012-2014 will include all new and updated policies, procedures, and programmatic information such that the AFSR for 2012-2014 will be an accurate and complete AFSR.

COTR understands its Clery Act obligations. COTR also understands the importance of compliance with its Clery Act obligations. COTR has taken all necessary corrective actions to ensure that it will publish and distribute an accurate and complete AFSR in the manner required by federal regulations.

c. **COTR’s Additional Corrective Actions to Address the Department’s Concerns**

i. COTR Devoted Staff Resources to Clery Act Compliance

Prior to the audit, the College began a review of its Clery Act compliance. In July 2014, as discussed above in Section I(c)(i), COTR appointed a Director of Public Safety to oversee the

Public Safety Department and to focus on the Clery Act. The Director reviewed the findings of the Audit Team and began working on an AFSR covering the years 2011-2013, along with continuing the review of the relevant policies and procedures. The Director worked closely with the Director of Housing and other College staff to ensure that fire safety operations are accurately reflected in the AFSR and relevant policies and procedures.

Additionally, as evidence of COTR's commitment to making sure all Clery-related policies and procedures are in place, the College is hiring a Public Safety Manager. One of the Public Safety Manager's main focuses will be on compliance with the Clery Act including its fire safety reporting requirements.

ii. COTR Clarified the Process for Publication of the AFSR

BP and AP 3507 (Fire Safety) address the preparation, publication, and distribution of the AFSR. The College will follow BP and AP 3507 to ensure that the complete and accurate AFSR is published in accordance with legal requirements so that students, employees, prospective students and employees, and others will have ready access to safety information.

As mentioned above, the College's AFSR was published on October 1, 2014. All students along with all employees received email notification of the availability of the report.

iii. COTR is Improving Its AFSR for 2012-2014 Forward

Work is now in progress on the report for the AFSR covering the years 2012-2014. We are in the process of further updating the 2015 AFSR report to include even more detail and add clarifying language in several areas.

The College has attached the current draft of its AFSR for 2012-2014 (*Ref. EX-6*). If the Department has any concerns with the draft AFSR, or suggests any changes to the draft, please notify us so that we may revise the AFSR as necessary before it is published in October 2015. We are committed to continuous quality improvement in the AFSR and fire safety.

III. Finding #3. Drug and Alcohol Abuse Prevention Program Requirements Not Met

a. Information Regarding COTR's Compliance

The College takes drug and alcohol abuse prevention seriously.

i. Policies and Procedures in Place Prior to the Audit, Including COTR's Drug and Alcohol Abuse Prevention Program

The Department determined that the College did not have an official policy or protocol governing the possession, use, and/or distribution of illegal drugs and alcohol abuse on-campus. In fact, since 1989, COTR has had Board Policy ("BP") 3550, Drug-Free Workplace (EX-17). BP 3550 stated that the College "is committed to maintaining a drug-free workplace in accordance with the requirements of the U.S. Drug-Free Workplace Act of 1988" and certified how the College would provide a drug-free workplace. The College also has AP 3550, Drug Free Environment and Drug Prevention Program (EX-18). AP 3550 confirms that COTR "is committed to providing its employees and students with a drug free

workplace and campus environment. It emphasizes prevention and intervention through education.” During the audit team’s review, College personnel sent the reviewers copies of BP 3550 and AP 3550 as part of the response to the initial request for documentation. The College has revised both documents through its constituent review process.

AP 3550 sets forth the College’s Drug and Alcohol Abuse Prevention Program (“DAAPP”), including counseling resources information, controlled substance and alcohol prohibitions, and information about the College’s annual notification to students and employees. AP 3550 sets forth the DAAPP in compliance with Part 86 regulations and the Drug-Free Schools and Communities Act (“DFSCA”). Specifically, AP 3550 states:

Annually, the District shall distribute to each student and employee:

Standards of conduct that clearly prohibit, at a minimum, the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees on its property or as part of any of its activities;

A description of the applicable legal sanctions under local, State, or Federal law for the 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 reentry programs that are available to employees or students; and

A clear statement that the institution will impose sanctions on students and employees (consistent with local, state, and federal law), and a description of those sanctions, up to and including expulsion or termination of employment and referral for prosecution, for violations of the standards of conduct.

The college shall review biennially their drug prevention program to determine its effectiveness and implement changes to the programs if needed.

The College’s review of its DAAPP in Spring 2014 is described below in subsection (III)(b)(v).

COTR also had in place BP 3560, Alcoholic Beverages on Campus, providing that alcoholic beverages on-campus could only be served on campus in accordance with Administrative Procedure (“AP”) 3560,¹ (EX-19). BP 3560 was first adopted in 1977. The College also had

¹ California law provides specific limited circumstances when alcohol may be on campus. Cal. Business & Professions Code § 25608(a)(17). AP 3560 describes those allowable circumstances at COTR.

in place BP 3560 and AP 3560, which specifies rules governing the possession, sale, consumption, or furnishing of alcohol on campus. COTR has updated BP 3550 as part of its comprehensive policy and procedure review subsequent to the audit (EX-20). Updated BP 3560 and AP 3560 are in the final constituent review process (EX-21).

In addition, COTR prohibits the illegal or unauthorized possession and use of drug and alcohol through the Student Code of Conduct. BP 5500, Standards of Conduct, provides that conduct involving alcohol and illegal drugs “shall constitute good cause for discipline, including but not limited to the removal, suspension, or expulsion of a student,” (EX-22). AP 5500 contains the Student Conduct Code and Disciplinary Procedures (EX-23). Students attending College of the Redwoods Community College District are held responsible to our Student Code of Conduct, which can be found in the current Catalog, under the section Student Rights and Responsibilities (EX-24), *available online at <http://www.redwoods.edu/Catalog/2014-2015%20Catalog.pdf>*. In addition to local, state and federal laws, our Student Code of Conduct prohibits: Illegal or Unauthorized Possession/Use of Alcohol and Drugs. This includes: “Unlawful possession, use, sale, or offer to sell, or furnishing, or being under the influence of, any controlled substance listed in California Health and Safety Code Section 11053 et seq., possession of, or offering, arranging or negotiating the sale of any drug paraphernalia, as defined in California Health and Safety Code Section 111014.5,” (EX-25). The College has also updated BP 5500 and AP 5500 as part of its comprehensive policy and procedure review subsequent to the audit (EX-26).

ii. COTR’s Drug and Alcohol Abuse Prevention Efforts Prior to the Audit in Addition to the Existing DAAPP

In addition to the policies and procedures discussed above, the College offers drug and alcohol abuse prevention services to its employees and students. COTR’s Health Services Clinic provides alcohol and drug abuse prevention and treatment resources to students and employees. The College also provided substance abuse information through its Department of Public Safety at <http://www.redwoods.edu/safety.asp>. COTR is in the process of updating its webpages.

a. Drug and Alcohol Abuse Prevention for Employees

The College complies with the Drug-Free Workplace Act (41 U.S.C. 701) and the Drug Free Schools and Communities Act (20 U.S.C. 1145g). (*See Faculty Handbook, available online at <http://www.redwoods.edu/cte/faculty-handbook.asp>*.)

Information about training, programs, resources, counseling, treatment, rehabilitation or reentry programs are available to employees during new employee orientation. Substance abuse needs are covered by the medical plan that the College offers.

COTR offers leaves, including those covered under the Family and Medical Leave Act, which allow qualified employees to be off work to receive drug and alcohol abuse treatment. Employees may work with the Human Resources Department to request a leave to participate in treatment, and the reason for the leave is maintained confidentially. Leaves may be full leaves, meaning the employee is entirely absent from work, or the employee may take intermittent leave of absence. Leaves are coordinated through and documented by the employee’s treatment provider.

b. Drug and Alcohol Abuse Prevention for Students

The College offers Student Wellness activities which addresses drug and alcohol abuse as well as other student wellness topics. In February 2014, counseling staff surveyed students on campus to determine what types of wellness topics and activities were of interest (EX-27). In March 2014, counseling staff in collaboration with the Residence Halls, presented a movie screening Q&A entitled "Marijuana: Neurochemistry & Physiology" at the Del Norte Residence Hall Lounge (EX-28). The event was well-received by students in attendance (EX-29). The Residence Hall Community Guidelines prohibit alcohol and illegal drug use on campus and list contact information for alcohol and other drug programs among other resources (*Ref.* EX-11).

COTR also addresses alcohol and drug awareness on campus through the Counseling page on its website at <http://www.redwoods.edu/Eureka/Counseling/MentalHealth.asp>. When a student clicks on the Mental Health tab, the featured choices that lead to other resources includes contact information for Humboldt County Mental Health Alcohol and Other Drugs Dual Recovery Services, as well as other mental health services. The webpage also includes phone numbers for Methamphetamine Hotline and crisis hotlines for Alcohol/Narcotics Anonymous and Suicide Crises. In addition, the Mental Health tab also includes links to resources "Campus Blues" and "Go Ask Alice!" Campus Blues features information and resources for college students on mental health, anxiety, loneliness, alcohol abuse, gambling, and other social and emotional issues. Go Ask Alice! is a web-based health question-and-answer service produced by Alice!, Columbia University's Health Education Program, which answers questions about alcohol and other drugs, relationships, sexuality, emotional health, and other topics.

b. COTR Has Taken the Actions Required by the Department in the PRR

i. COTR Has a Drug and Alcohol Abuse Prevent Program in Place

As described above in Section III(a), COTR does have a DAAPP including the required elements set forth in the Part 86 regulations. The DAAPP is described in Administrative Procedure ("AP") 3550, Drug Free Environment and Drug Prevention Program. AP 3550, Drug Free Environment and Drug Prevention Program, specifies that the DAAPP disclosure will be distributed annually to all students and employees.

ii. COTR Has Reviewed Its Procedures regarding Distribution of the DAAPP Disclosure

AP 3550, Drug Free Environment and Drug Prevention Program, specifies that the DAAPP disclosure will be distributed annually to all students and employees.

The College has reviewed its internal procedures governing distribution of this disclosure. To ensure that the DAAPP disclosure is distributed to every current student and employee, COTR has made information regarding training, programs, resources, counseling, treatment, rehabilitation or reentry programs available to employees during new employee orientation. A disclosure notice was sent to all students and employees on February 17, 2015, (EX-30). Additionally, COTR's Health Services Clinic provides alcohol and drug abuse prevention and treatment resources to students and employees. The College also provided substance abuse information through its Department of Public Safety at <http://www.redwoods.edu/safety.asp>. COTR is in the process of updating its webpages.

iii. COTR Has Reviewed its Policies and Procedures and Updated/Created New Policies and Procedures Regarding Drug and Alcohol Abuse Prevention

The College reviewed its internal policies and procedures relating to drug and alcohol abuse prevention. The College has updated key policies and procedures: Board Policy (“BP”) 3550, now titled “Drug-Free Environment and Drug Prevention Program” (*Ref. EX-20*) and is in the final stages of updating BP 3560, Alcoholic Beverages on Campus; and Administrative Procedure (“AP”) 3560, Alcoholic Beverages on Campus (*Ref. EX-21*). The revised policies include more information and clarify the application of the BPs and AP.

iv. Certification Statement of Compliance

The Program Review Report required COTR to provide a “certification statement attesting to the fact that the [DAAPP] materials were distributed in accordance with the DFSCA.” This constitutes that certification.

The College sent the DAAPP disclosure by email to all students on February 17, 2015 (through Mail Chimp), and employees on February 17, 2015 (*Ref. EX-30*). A copy of the DAAPP disclosure is included as an exhibit (EX-31).

COTR understands its DFSCA obligations. COTR also understands the importance of compliance with its DFSCA obligations. COTR has taken all necessary corrective actions

to ensure that it will distribute the DAAPP disclosure in the manner required by federal regulations.

v. COTR Has Conducted A Biennial Review of the DAAPP

During the Spring 2014 semester, faculty counselors facilitated the research and further development of COTR DAAPP. Best practices in educational settings were researched and a student survey was administered on February 11-13, 2014. Several workshops were offered for students based on the survey results. Attached are student evaluation results from the activities offered during the spring 2014 semester (*Ref. EX-27*) Subsequently, faculty counselors continued to research best practices and a website was created that includes on and off-campus resources for a variety of health and wellness issues. Currently, Counseling and Residence Hall staff is planning wellness activities specific to students living on campus such as: Drugs and Alcohol Abuse and Prevention, Sexual Assault / Sexual Harassment, and/or How to Live with a Roommate. An evaluation will be provided to students at the end of each activity. An annual review of the DAAPP process and information will be included in the Counseling Department’s program review cycle.

The Counseling Department will send a survey to all students by March 1 to gather information relative to the activities currently offered and identify activities that students what the College to offer. A DAAPP steering committee comprised of faculty and counselors will be formed to take a closer look the COTR DAAPP and determine what improvements are needed. A copy of the review will be sent to the review team by March 15, 2015.

vi. COTR Has Reviewed its Policies and Procedures regarding Biennial Review of the DAAPP

AP 3550, Drug Free Environment and Drug Prevention Program, specifies that the College will review biennially its DAAPP to determine effectiveness and implement changes to the program if needed.

c. **COTR Is Undertaking Additional Actions to Address the Department's Concerns**

i. COTR Personnel Received Additional Training

In collaboration with the Humboldt County Office of Education, Counseling and Advising staff attended substance abuse intervention training on February 24, 2015. The training focused on "Brief Intervention", a counseling-type intervention consisting of 2-4 sessions for adolescents, who use tobacco, alcohol and/or other drugs.

ii. COTR is Developing New Health and Wellness Strategies for Alcohol and Other Drugs ("AOD") Prevention and Intervention

The Health and Wellness website will be substantially developed within the spring 2015 semester. Many of the developments include resources pertaining to alcohol and other drugs ("AOD").

The College is further developing its AOD awareness and prevention programs to be multifaceted and include education, prevention, early intervention, environmental change, and enforcement information. The involvement of administration, faculty, staff, and students will be a crucial component of the level of success and longevity of the AOD comprehensive program for students and employees. Building upon sustainable programs, the College is crafting new solutions to build a usable and successful AOD awareness and prevention program. The various aspects of the AOD program will need an evaluative process that can be used to generate appropriate data, given the complexity of needs, diversity of students and employees drug and alcohol issues, and the community and campus resources. Connecting with public safety, community and county organizations will provide important liaisons and partnerships.

iii. COTR is Developing Outreach Mechanisms for Targeted Students

As one of its key goals, COTR is developing outreach mechanisms to help at-risk students connect with AOD prevention and treatment resources. The College is considering various approaches such as the following:

- Get AOD information out to campus and community through the creation of brochures and ongoing updates regularly to campus and community about AOD policies and prevention tools through workshops;
- Create brochures that address AOD risks that affect our communities such as crime, homelessness, violence and distribute throughout the campus and community;
- Notify new students about alcohol and drug policies before arrival on campus (through online Orientation, student handbooks, Outreach campaigns);
- Create ongoing surveys to assess on and off campus alcohol and drug use;

- Create mechanisms for capturing what students learn in AOD prevention workshops and Orientation, how useful was information and how easy was it to read and understand; and
- Create “Awareness” and “Drug and Alcohol Free” activities throughout the year, at events, such as Residence Hall Orientation and athletic events.

IV. Finding #4. Improper Loan and Grant Payment Calculations

a. Information regarding COTR’s Compliance

During the audit, the College learned that it was incorrectly calculating Title IV grant and loan awards for students enrolled in its Licensed Vocational Nursing Certificate (LVN) and Dental Assisting Certificate (DA) programs during the 2012-2013 and 2013-14 award years. COTR has reviewed its internal policies and procedures to determine why this error occurred and to correct the error.

b. COTR Has Taken the Actions Required by the Department in the PRR

The College has reconstructed the records of all of its students who were enrolled in any portion of the LVN and DA certificate programs during the 2012-2013 and 2013-14 award years and received Title IV funds.

The College has prepared the required student calculations relating to Finding #4. The calculations will be sent separately as an Excel compatible spreadsheet in an encrypted format as specified in the Program Review Report. The process used to calculate the information is attached (EX-32).

To ensure that College employees follow the proper procedure and guard against such calculation errors in the future, an area has been added to the File Review Checklist so file reviewers are prompted to complete the clock hour checklist for students in these programs. The clock hour checklists for both the LVN and DA are attached (EX-33).

V. Finding #5. Verification Violations

a. COTR Has Taken the Actions Required by the Department in the PRR

During the audit, the audit team determined that the College failed to verify properly certain students’ information. The College has analyzed the information for these students and responds to the specifics of Finding #5 as follows:

- For Student #2, the Department found: The 2012-2013 ISIR #04 (application completed by the student on September 28, 2012) was marked "Y" for verification by the Department. The student completed and signed a 2012-2013 Verification Worksheet form, and reported herself and her father as members in the household. The student was considered a dependent student; thus, she and her father signed the worksheet. However, the worksheet was not dated or signed; therefore there was no indication when the form was completed or signed.

COTR Response for Student #2: We agree with the comment that the worksheet was not dated; however, the form was signed as required by both the student and her father. The

student is no longer enrolled; therefore we have not been able to contact the student to get the form dated; however, each document is date-stamped when received, which does provide a time frame for ensuring documents are processed appropriately

- For Student #3, the Department found: The 2012-2013 ISIR #05 (application completed by the student on September 21, 2012) was marked "Y" for verification by the Department. The student submitted a 2012-2013 Verification Worksheet form signed and dated by his wife, who attended COTR in the same year as the student whose file was reviewed. However, the student neglected to sign and date the Verification Worksheet for himself. Therefore, there was no indication when the form was completed or signed.

COTR Response for Student #3: The College's response for Student #3 is included below with its response for Student #17.

- For Student #17, the Department found: The 2013-2014 ISIR #03 (application completed by the student on April 8, 2014) was marked "Y" for verification in the V1 category by the Department. The student submitted a 2013-2014 Verification Worksheet form to verify the household members and number of members in college. The student was considered a dependent student; thus, her mother also signed and dated the form. However, the student neglected to sign and date the worksheet herself. Therefore, there was no indication when the form was completed or signed.

COTR Response for Students #3 and #17: We agree with these findings. Student #3 is no longer enrolled; therefore we have not been able to contact the student to sign and date the form. We were able to contact Student #17 and get the appropriate signatures. The signed verification form will be sent separately in an encrypted format as specified in the Program Review Report.

We have had several staff meetings and trainings to ensure all staff understand that each area of verification documents must be completed, including all required signatures and the date. We have instituted a process where each staff member who handles any document ensures all areas are appropriately completed. A new area on the File Review Checklist reminds staff to check for signature and date completion before processing. (Ref. EX-33) The Financial Aid Policies and Procedures have been updated to include a statement indicating that incomplete verification documents will not be processed. A copy of the updated Financial Aid Policies and Procedures is attached, with the applicable area highlighted (EX-34, pg. 5). The updated process, policies, and procedures will ensure that students' Institutional Student Information Record selected for verification by the Department will be verified in accordance with applicable regulations.

- For Student #19, the Department found: The 2013-14 ISIR #03 (application completed by the student on July 22, 2013) was marked "Y" for verification in the V1 category by the Department. The ISIR #03 showed that the student was divorced or widowed and included no indication of a spouse's information. Additionally, ISIR #03 showed that the student has children; she is supporting dependents other than children or a spouse. ISIR #03 indicated 6 members are in the household with 2 members in college. However, the student's record included a copy of a marriage certificate stating she was married on June 22, 2011. The student submitted a Child Support

Verification Worksheet indicating the child support for two children was paid by the individual whom she had married and not the student herself. Although the ISIR was flagged to verify the student's child support information, the student submitted information that conflicted with what she reported on the ISIR, such as marital status, number of household members and number in college, and the children or dependents she was supporting. COTR made a notation on the File Review Checklist on the discrepancies; however, the note did not indicate what's been done after receiving all the correct information from the student.

COTR Response for Student #19: We acknowledge that it appeared the information was not noted; however, both sides of the File Review Checklist inadvertently were not scanned so the reviewer did not see the notes from the back side of the checklist. Additionally, comments were in the Ellucian database indicating the reviewer had correctly processed the information after receiving clarification from the student. The student was paid correctly. The correctly scanned documents and comments from Ellucian will be sent separately in an encrypted format as specified in the Program Review Report.

VI. Finding #6. Failure to Provide Adequate Consumer Information

a. Information Regarding COTR's Compliance

As described in the Program Review Report, the Family Educational Rights and Privacy Act ("FERPA") requires schools to provide an annual notification describing students' rights to review their educational records, request changes to their records, consent to disclosures of personally identifiable information, and to file complaints with the Department, as well as procedures for reviewing and amending their educational records. The Department found that COTR failed to provide this annual notification. This information is included in the College catalog under Campus Policies & Regulations, Student Records and Privacy Act. The notification appears at pages 176-177 of the 2014-15 Catalog (EX-35). We apologize for not making this clear during the audit. In addition, on February 17, 2015, the College provided a notice to all enrolled students regarding FERPA and will continue to provide this annual notice. In fact, the College annually describes these rights in its Catalog.

b. COTR Has Taken the Actions Required by the Department in the PRR

The College has developed a comprehensive Consumer Information page, attached and located on the College's website on the footer of the Home Page titled "Consumer Information." The Consumer Information page was modeled from a report from the National Postsecondary Education Cooperative (NPEC) regarding information required to be disclosed under the Higher Education Act of 1965 that included suggested titles for HEA Student Consumer Information of Institutional Web Portal Page.

The Consumer Information page addresses the following areas noted as areas of noncompliance in this Finding:

- Names of associations, agencies, and/or governmental bodies that accredit, approve, or license the institution and its programs; and procedures for obtaining or reviewing documents describing accreditation, approval, or licensing. On the Consumer

Information page, this information is titled “School and Program Accreditation, Approval, or Licensure” with a link to the information required.

- A statement that unauthorized distributions of copyrighted materials may subject the students to civil and criminal liabilities and a summary of the federal copyright laws. The link on the Consumer Information page takes the reader to the catalog with directions to the Article number. On the Consumer Information page, this information is titled “Copyright Infringement-Policies and Sanctions” with a link to the College Catalog and reference to the appropriate Article that addresses civil and criminal penalties for violation of federal copyright laws.
- The percentage of Federal Pell Grant recipients in the information on the diversity of the student body. On the Consumer Information page, this information is titled “Student Diversity” with a link to the required information.
- Notification to all students and prospective students of a summary of the Equity in Athletics Report and the right to request a full report. On the Consumer Information page, this information is titled “Intercollegiate Athletic Program Participation Rates and Financial Support Data (Equity in Athletics Disclosure Act)” with a link to the report. A summary report has been provided to all students and prospective student on February 17 along with their right to request a full report. In the future, this information will be provided annually.
- Annual notice that describes the students’ rights to review their educational records, request changes to their records, consent to disclosures of personally identifiable information, and to file complaints with the Department, as well as reviewing and amending their educational records. A notice was provided on February 13, 2015 with the required information, which is included in the 2014-15 Catalog (EX-36). In addition, the College is including a link to this information on the Consumer Information page. On the Consumer Information page, this information is titled “General Institutional Information/Privacy of Student Records-Family Education Rights and Privacy Act (FERPA)”. In the future, this information will be provided annually.
- The annual notice to enrolled students will include a link to the Consumer Information page that states that a paper copy will be provided upon request.

The College is committed to providing accurate and adequate consumer information to current and prospective students.

VII. Finding #7. Inaccurate Reporting to the National Student Loan Data System (NSLDS)

a. Information Regarding COTR’s Compliance

The College understands that it must provide timely notification of changes to a student’s enrollment status for purposes of student loan administration. The Department found that COTR reported an incorrect withdrawal date for a student or did not notify the National Student Loan Data System (“NSLDS”) where some students’ enrollment status changed. The College requires faculty

to report the last date of attendance for students who receive failing grades for Return to Title IV calculation purposes. Because the students who receive failing grades were enrolled for the entire term, we had correctly reported the enrollment status with the information available to us during the term.

b. COTR Has Taken the Actions Required by the Department in the PRR

NSLDS records of the 2013-2014 students who had enrollment status change or withdrew from COTR were reviewed. Students who officially withdrew from the college had correct dates.

For students who received 'failing' grades we reviewed and compared the dates and statuses with NSLDS records. The last date of attendance was determined and reported to NSLDS to reflect this date. A spreadsheet will be sent separately in an encrypted format as specified in the Program Review Report.

- For Student #22, the Department found: This student withdrew from COTR; her last day of attendance and date of determination was 10/24/13. However, COTR reported the student's withdrawal date as 12/14/13 to NSLDS per records printed on 7/9/14.

COTR Response for Student #22: We acknowledge the student's last date of attendance was 10/24/13; however the date of determination was December 20, 2013. The student was enrolled through the last day of the class, 12/14/13. When the instructor reported the failing (F) grade on the final grade roster, a last day of attendance of 10/24/13 was noted. The corrected last date of attendance has been updated on NSLDS. A spreadsheet will be sent separately with the updated student information.

- For Student #27, the Department found: This student is no longer enrolled at COTR; his last day of attendance was 3/13/14. However, COTR reported his status as half-time effective 4/3/14, to NSLDS, per records printed on 7/19/14.

COTR Response for Student #27: We acknowledge the half-time status was effective 3/13/14; however, the date of determination was 5/23/2014. The student was enrolled through the last day of the term, 5/16/14. When the instructor reported the failing (F) grade on the final grade roster, a last day of attendance of 3/13/14 was noted. The corrected last date of attendance has been reported to NSLDS. A spreadsheet will be sent separately with the updated student information.

COTR instituted a new process where faculty can submit withdrawals for non-attendance, which should reduce the number of cases in which this occurs. A copy of the information provided to faculty is attached (EX-37).

We have added a step to the Return to Title IV procedure as indicated in our Financial Aid Policies and Procedures to ensure that students who receive failing grades due to attendance issues will be reviewed and reported appropriately to the NSLDS. A copy is attached, with the applicable area highlighted Procedures (*Ref.* EX-34, pg. 14).

- For Student #29, the Department found: This student was enrolled as a three-

quarter time student in the 2013-14 award year; however, COTR reported the student as half-time with an effective date of 5/11/13, to NSLDS, per records printed on 7/9/14.

COTR Response for Student #29: The status was correct as reported. The requirement to report three-quarter time status did not go into effect until October 1, 2014. Per GEN 14-07, dated April 14, 2014, the date by which schools will be required to use the new enrollment reporting file layouts was extended from July 1, 2014 to October 1, 2014.

- For Student #30, the Department found: This student was enrolled as a three-quarter time student in the 2013-14 award year; however, COTR reported the student as half-time with an effective date of 8/24/13, to NSLDS, per records printed on 7/9/14

COTR Response for Student #30: The status was correct as reported. The requirement to report three-quarter time status did not go into effect until October 1, 2014. Per GEN 14-07, dated April 14, 2014, the date by which schools will be required to use the new enrollment reporting file layouts was extended from July 1, 2014 to October 1, 2014.

COTR is committed to improving its processes to ensure accurate reporting to NSLDS. COTR has revised its procedures for notifying NSLDS when a change to a student's enrollment status occurs. A copy of the Financial Aid Policies and Procedures is attached, with the applicable area highlighted (*Ref. EX-34, pg. 14*).

VIII. Finding #8. Federal Pell Grant Overpayment

The Department determined that COTR created an overpayment to the Federal Pell Grant Program by paying Student #10 \$1,388 on January 11, 2013 and \$1,387 on March 8, 2013. The Department determined that the student dropped a class on January 17, 2013, and, therefore, changed the enrollment status to half time. The Department found that COTR failed to adjust the Federal Pell Grant award from full time to half time.

COTR analyzed information related to this Finding. The student was enrolled as a full-time student through the end of the term; however, when final grades were reported after the term was over (May 22, 2014) a last day of attendance of January 17, 2013 was noted. The payment has been adjusted to the correct amount of \$2,082 for the term and funds returned. A printout from the Common Origination and Disbursement system verifying repayment will be sent separately in an encrypted format as specified in the Program Review Report.

As noted in response to Finding #7, a process has been instituted where faculty can submit withdrawals for non-attendance, which should reduce the number of cases in which this occurs. A copy of the information provided to faculty is attached (*Ref. EX-37*).

IX. Finding #9. Missing Documentation of Notification of Disbursement and Cancellation Options

a. COTR Has Taken the Actions Required by the Department in the PRR

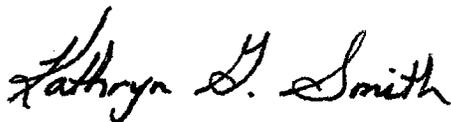
The College acknowledges that the reviewers did not find documentation, in any of the student files tested, of disbursement notifications. The College also acknowledges that the template email sent from Higher One to students does not include all of the required elements outlined in 34 C.F.R. § 668.165(a). Therefore, the College agrees with the Finding and has developed a disbursement notice that is sent to all loan recipients with the required information (EX-38). Our Financial Aid Policies and Procedures have been updated to include this information. A copy is attached, with the applicable area highlighted (Ref. EX-34, pgs. 8, 17, 18).

Conclusion

The College appreciates the opportunity to respond to the Department's Findings set forth in the Program Review Report. The audit has given us valuable guidance for improving our programs and services. We are determined to continue our review of processes, practices, policies, and procedures to ensure compliance with federal requirements. If you believe that our actions for any of the Findings are inadequate or insufficient, we ask that you please inform us of any issues and allow us an opportunity to take additional steps to achieve full compliance.

Should you need additional information, please contact me at Kathy-smith@redwoods.edu or (707)-476-4170. We look forward to hearing from you and working with you to improve our College further.

Sincerely,



Kathryn G. Smith
President/Superintendent
Enclosures