

Saint Joseph's College of Maine
278 Whites Bridge Road
Standish, Maine 04084

October 5, 2020

Report Submitted in conjunction with the Focused Visit scheduled for October 18-20,
2020.

This focused evaluation is the result of the Commission's formal Notice of Concern
about Institutional Resources conveyed in its letter of March 13, 2019

Introduction

This Report has been prepared for the New England Commission on Higher Education at its request as part of the preparation for a “focused evaluation” scheduled for Fall 2020.

The report responds to the matters identified in letters from the Commission to Saint Joseph's College dated March 13, 2019 and April 30, 2020 related to Standard 7: Institutional Resources and to the College's recently concluded review by the Department of Education related to financial aid.

STANDARD SEVEN: INSTITUTIONAL RESOURCES

The institution has sufficient human, financial, information, physical, and technological resources and capacity to support its mission. Through periodic evaluation, the institution demonstrates that its resources are sufficient to sustain the quality of its educational program and to support institutional improvement now and in the foreseeable future. The institution demonstrates, through verifiable internal and external evidence, its financial capacity to graduate its entering class. The institution administers its resources in an ethical manner and assures effective systems of enterprise risk management, regulatory compliance, internal controls, and contingency management.

In its letter dated March 13, 2019 to the College, the Commission pointed in particular to the following elements of Standard Seven.

7.4 The institution preserves and enhances available financial resources sufficient to support its mission. It manages its financial resources and allocates them in a way that reflects its mission and purposes. It demonstrates the ability to respond to financial emergencies and unforeseen circumstances.

7.5 The institution is financially stable. Ostensible financial stability is not achieved at the expense of educational quality. Its stability and viability are not unduly dependent upon vulnerable financial resources or an historically narrow base of support.

7.6 The institution's multi-year financial planning is realistic and reflects the capacity of the institution to depend on identified sources of revenue and ensure the advancement of educational quality and services for students.

7.14 The institution's financial planning, including contingency planning, is integrated with overall planning and evaluation processes. The institution demonstrates its ability to analyze its financial condition and understand the opportunities and constraints that will influence its financial condition and acts accordingly. It reallocates resources as necessary to achieve its purposes and objectives. The institution implements a realistic plan for addressing issues raised by the existence of any operating deficit.

Additionally, in a letter dated April 30, 2020, the Commission added the following elements to the focused evaluation:

--a realistic five-year enrollment plan and multi-year financial plan that are integrated with the College's strategic plan; and

--the results of the November 2018 federal financial aid audit.

Institutional Overview

Saint Joseph's College of Maine (SJC) is a private, Catholic institution of higher education sponsored by the Sisters of Mercy who founded the College in 1912 in Portland. In the mid-1950s the Sisters relocated the College to the former Verrill Estate on the eastern shore of Sebago Lake in Standish, Maine. Today, the campus is sited on 474 acres.

SJC is classified as a Carnegie Masters Larger institution. In addition to being accredited by the New England Commission on Higher Education, the College also has specialized accreditation for several of its programs.

The baccalaureate degree program in nursing and master's degree program in nursing at Saint Joseph's College is accredited by the Commission on Collegiate Nursing Education. The online long-term care administration program is also accredited by the National Association of Boards of Examiners of Long-Term Care Administrators. The online health information management program is accredited by the Commission on Accreditation for Health Informatics and Information Management Education (CAHIIM). And the Bachelor of Social Work (BSW) program is accredited by the Council on Social Work Education (CSWE).

Founded as an institution to prepare women to become teachers, since 1970 the College has been coeducational, offering educational opportunities to women and men of all faiths and ages. Today, the campus program offers a wide range of liberal art and pre-professional programs to undergraduate students. About half of the students in the campus program are from Maine. The other half come primarily from other states in New England and the northeastern United States, although for the past several years we have been intentional about recruiting students from other parts of the country in response to the changing demographics.

In 1976, the College began offering “degrees at a distance” to place-bound learners across the country. This program has grown into what today is known as the College’s “online program” which offers both undergraduate and graduate degrees in a wide range of disciplines, pre-professional, and professional areas.

Areas of Focus

In the spring of 2019, when the Commission issued its Notice of Concern on the basis of events that occurred in FY17 and FY18, the College both understood the Commission’s concern and believed that we were on the way to addressing the underlying issues related to budgeting and planning.

Positive year-end results in FY18 and FY19, when expenses were balanced with available revenue reflected more “normal” outcomes for the College and promised to put us back on track to future growth and sustainability guided by the strategic plan.

The position of Chief Financial Officer was re-crafted into a Chief Business and Finance Officer with more clearly articulated expectations in the areas of business development and strategic financial management and the subsequent search would bring us a highly qualified CBFO with experience in these areas as well as experience in “turn-around” situations.

We closed the books on FY19 and headed into FY20 with a sense of cautious optimism which was met with the twin challenges that faced much of higher education and the entire world in FY20: changing demographics and enrollment behaviors, and the global pandemic.

Both had a significant impact on Saint Joseph’s College, although in many ways the College has fared much better than many other institutions.

COVID, in many ways, turned the planning, operational, and financial management of the College on its head. We moved into planning for multiple scenarios and using all the resources available to support the college. Among other things, reacting quickly to closing of residence halls, we secured PPP financing and processed the Department of Education HEEDF funds. The 2020 FY draft audit reflects a \$108,000 operating deficit, and SJC met its debt covenants, continuing its recent history of balancing revenue and expenses.

At the same time, the College continued to address the underlying issues that led to the Commission's (and, frankly, the College's concern).

In what follows, we will make the case that Saint Joseph's College is financially stable, that it has the institutional resources required to continue the successful pursuit of our mission, and that our planning and budgeting capacity is appropriate both for an institution of our size and nature (student-revenue dependent) and for the current environment of uncertainty that Saint Joseph's occupies with all of higher education and much of society.

However, this is not to suggest that the challenges Saint Joseph's faces are not real and significant; these will also be addressed in the discussion which follows.

Financial Stability

A review of the past five years shows that, despite the deficit year of FY17, the College is remarkably stable. During this period, as it has throughout most of its history, Saint Joseph's has relied on matching revenue and expenses, recently through control and reduction in expenses. SJC has demonstrated the ability to manage this process over the past 5 years. One element in actively managing expenses was the adoption of an "expense model" which set the following targets for spending:

Compensation	65%
Other operating	24%
Capital	9%
Contingency	2%

These percentages allow us to assess the patterns of spending at the College, which is important because SJC recognizes, like many higher education institutions, it has limited operating capital reserves and needs to carefully monitor its spending.

Evidence of the College's capacity in this area can be found in the larger revenue and expense trends of the past six years.

As Table 1 shows, for the period beginning with FY15 and ending with FY20, the College has finished four of the six years with a positive result. The two negative results occurred in FY17 and the COVID-altered FY20, when the College's non-student auxiliary and other non-student revenue was seriously impacted and led to a small deficit of approximately \$108,000.

Table 1: SJC Revenue and Expense Trends, FY15 through FY20

SJC Revenue and Expense Trends						
	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>
Campus tuition (net)	15,618,752	15,115,682	15,996,356	15,526,501	16,011,168	15,721,735
Room & Board	8,370,226	8,740,983	8,403,400	8,886,682	9,263,155	7,711,480
On-line tuition & Fees	10,670,488	10,617,792	8,665,954	8,253,413	7,901,673	7,088,805
Auxiliary	888,391	1,034,713	1,252,085	1,397,141	1,556,083	698,886
Other	1,969,966	2,169,920	2,635,120	2,987,968	2,732,882	1,831,832
Total	37,517,823	37,679,090	36,952,915	37,051,705	37,464,961	34,285,426
<i>Note: Restricted released</i>		813,585		1,239,940	1,218,760	1,229,590
	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>
Revenue	37,517,823	37,679,090	36,952,915	37,051,705	37,464,961	34,285,426
Exp	37,151,092	37,540,280	38,673,362	36,879,664	36,740,594	34,393,853

Surplus (deficit) Ops	366,731	138,810	(1,720,447)	172,041	724,367	(108,427)
Net assets (million)	39.3	38.8	38	38.5	41.7	42.2

Furthermore, the table shows that over those six fiscal years, net assets have actually increased by \$2.9 million.

A comparison of expenses by functional categories also points to this stability. From FY17 through FY20, the percentage of annual expense committed to student development remained stable at 62% and the percentage of annual expense committed to institutional support and auxiliary expense remained stable at 38%.

Other external validated sources of evidence relative to the College's financial condition include our Composite Financial Responsibility scores and our bond debt covenant ratios results. For the three most recent years for which Composite Financial Responsibility scores have been published, Saint Joseph's results are well above the threshold score of 1.5 Two additional years, calculated internally, show similar results

Table 2: Composite Financial Responsibility Scores (FY16 through FY20)

FY16	2.5
FY17	2.3
FY18	2.5
FY19	2.7
FY20	2.6

And for the past three fiscal years (FY18, FY19, and FY20), the College has met the debt covenants associated with our long-term debt.

Additional, external validation of the College financial position can be found in the fact that the College was able to refinance a portion of our long-term debt through a regular bond refunding program offered by the Maine Health & Higher Education Facilities Authority in the spring of 2020.

And we are currently in the process of being approved to participate in a "new money" bond offering from MHHEFA that will allow the College to replace short-term capital lease debt associated with the Athletics Complex renovation with longer-term lower

interest debt. This refinancing will result in an estimated reduction in annual debt service of approximately \$800,000. (Standards 7.4, 7.14)

Commitment to Institutional Improvement

Even as the College has had to adjust to lower enrollments and lower revenue over the past several years, we have continued to make investments that will improve Saint Joseph's College. This institutional improvement is supported and funded in a variety of ways through annual operating and capital budgets and through special project funding.

Most improvements funded through annual operating budgets have been the result of reallocation of existing budget dollars that has become available through several rounds of right-sizing the College's workforce or through efficiencies gained through process redesign.

Recent reductions in the size of the administration and staff need to be seen in the context of the enrollment goals identified in *Sustaining the Promise*, the strategic plan approved by the Board in the fall of 2014. The plan set a campus enrollment headcount goal (and cap) of 1200 and an online (undergraduate and graduate) headcount goal of 5000 (2000/3000). Those goals were to be achieved over time, but within the long-term planning horizon of ten years established in *Sustaining the Promise*.

This anticipated growth led to an "up-staffing" mentality in order to both achieve and support the increased enrollments. A similar situation existed in the context of the academic programs where the expectation was that enrollment growth would help achieve the strategic metric of a 15:1 student faculty ratio (12:1) at the time the plan was approved).

The result was that, for a time, we likely had a workforce that was larger than our institutional size warranted. The reductions have brought us closer to sustainable levels. At the current, lower staffing levels, we believe that we have sufficient human resources to support our mission. This reality does not change the fact that, at sustainable staffing levels, the members of the Saint Joseph's faculty and staff community will need to learn to work in new ways.

Process redesign in a number of areas has allowed us to Increase productivity and achieve equal or better results for the same cost. Some examples of this are combining Campus Mail and Print Services and the IT Help Desk into a single Campus Services

group and the replacement of many single user desktop printers with centrally accessible network printers. Similarly, we consolidated our purchasing of supplies through either WB Mason or Amazon and centralized the purchasing process to better monitor supplies and their costs. We're also reviewing and contractual relationships, both to see that we are paying market rates for third-party services and are achieving acceptable returns. One result of this review is that we have consolidated all of our enrollment marketing work for both the campus and the online programs with a single vendor (EAB) which should improve both the product and the process.

However, even as we reduced staff in some areas, we also made the strategic decision to invest in certain functions that are aimed at enrollment growth, both through recruitment and through persistence (retention). For instance, in both FY 19 and FY20, we provided more resources in both the Admissions area and the Brand and Marketing area. These investments are aimed at future revenue growth.

In order to improve student success and persistence, we reorganized and expanded the Academic Center for Excellence, which has added three staff members over the past six months. Two of these are full-time professional academic and career coaches who will supplement the work of faculty advisors with a particular emphasis on career development beginning with first-year students.

Our recent persistence and graduation rates support the idea that the recent restructuring has not impacted student success. The 5 year average of fall to spring persistence for entering students is 92%, the same as for the 5 year period ending the year before the first restructuring. And, using those same time frames, the first to second year persistence rate has actually increased from 78% to 81%.

A very recent example of capital budget support for improvement are the upgrades to our campus technology infrastructure and classroom technology completed before the start of the current academic year. Some of this infrastructure work had been scheduled prior to the onset of the current pandemic. The classroom technology upgrade has a component of the IT strategic plan that was accelerated by the pandemic and the need to move to hyflex and remote instruction, but which will enhance our ability to deliver quality educational programs in the post-COVID 19 environment.

An example of "special project funding" is our work on the College's Center for Nursing Innovation. To date, the College has raised \$5,000,000 to support facility, program, and scholarship support. This total includes a \$2,000,000 gift from an individual donor and a

\$1,500,000 challenge grant from the Harold Alfond Foundation. Some of these funds have recently been used to upgrade the technology in the nursing simulation lab.

Finances, Financial Planning and Budgeting, and the Strategic Plan

In the fall of 2014, the Board of Trustees approved the strategic plan Sustaining the Promise: Toward Saint Joseph's College's Second Hundred Years. This is an "evergreen" plan with six overarching strategic goals and seven strategic initiatives. The plan originally approved by the Board had a five-year detailed planning window and a ten-year aspirational planning window to connect the short, mid-, longer-range activities of the College. Various strategic metrics, including enrollment, were to be projected and tracked across these five and ten year windows which would also provide the base data for multi-year financial planning.

The first attempts at implementing this complex planning and budgeting model were hampered by frequent turn-over in the College's CFO/CBFO's position. Since the fall of 2014, when the strategic plan was approved, the College has had four CFO/CBFOs (three "permanent" and one interim). Our current CBFO joined the College in the fall of 2019 and has led the College's efforts to improve and strengthen the College's budgeting and planning activities.

As part of this work, he has developed a sophisticated multi-year planning tool which uses ranges of possible outcomes for the various components of our revenue stream to model potential outcomes and to create a contextualized picture of the impact of particular results in a planning year will mean for both revenues and, necessarily, expenses. (Appendix A)

This richer understanding of our financial picture should allow the College to better understand our ability to sustain the College through thoughtful and strategic use of our revenue.

Work done under the umbrella of the strategic plan over the past several years has identified three areas where the College needs to invest. A detailed compensation study has provided the College with a target amount that would be needed to bring all current employees to the median compensation levels for our comparison group. Similarly, we have developed a detailed deferred maintenance model. Combined, these amount to approximately \$3.1 million.

Additional modeling, shared with the College Environments Committee of the Board of Trustees, shows various pathways to address these deferrals either through enrollment growth or right-sizing of the workforce to a smaller institution. Clarity about both the challenges and the available pathways will allow the College to pursue realistic and sustainable solutions.

In addition to developing these modeling and planning tools, the CBFO has also worked to improve various elements of the College's forecasting and budget, risk management, and financial information systems and processes that, in part, inform the planning model.

Forecasting

SJC recognizes the need for effective revenue forecasting, as the basis of a successful budgeting and financial management program. This includes revenue forecasting on several time frames, multi-year, annual for the coming year, and for the remaining balance of the current financial year.

Recent innovations and improvements include:

- i) More direct involvement, and better back-and-forth communication between those involved in executing enrollment and retention strategies and those performing forecasts
- ii) Recognition of annual calendar of when data that drives forecasting is available (see annual timeline) and coordinating key forecasting and decision-making activity
- iii) Introduction of probabilistic approach to forecasting that recognizes confidence in any forecast, to inform decision making (see finance committee presentation)
- iv) Conducting scenario review and planning for low probability, high impact, occurrences, or events

SJC was focused on iii) until COVID 'hit' in March when iv) became the most appropriate primary forecasting and planning tool.

Forecasting and scenario planning methodologies are originated and managed by SJC's Finance and Treasury Teams, reviewed in detail by SJC's Senior Leadership and the Finance sub-committee of SJC's Board of Trustees, and reviewed by the Board of Trustees. Individual forecasts and scenarios are reviewed by senior leadership, when

significant changes occur, and by the SJC Board of Trustees Finance Sub Committee four times a year (soon to be three). SJC's Executive Committee meets monthly and is regularly updated on budget and forecasting. The full Board of Trustees is updated at its regular meetings.

Extreme scenarios, although considered, are generally not shared more widely than described above, as doing so would require extensive education of the campus community. Budgets, forecasts and financial results are shared with the SJC community through All-College Committee meetings, the President's town-hall meetings, and updates at Faculty day and similar events. Information is posted on generally available college drives and explained / interpreted by College leadership.

Budgeting

Budgeting is an iterative process. An anticipated revenue budget is determined by Finance in collaboration with budget managers whose team's activities drive revenue - enrollment, advancement, campus life (residences), events (etc.). Expenditure priorities and targets are set in line with revenue expectations and operating goals, initially at an aggregate functional level (for 11 functional groups, each led by a Leadership Team member). Once established, these are translated into individual budget center and team budgets by functional leaders and managers. These are reviewed and any discrepancies or inconsistencies are discussed before the individual budget centers' templates are loaded into the college's budget system, against which expenditures are monitored. The Finance Team, College leadership, and budget managers all receive weekly reports to facilitate this.

Risk management

SJC revised its risk register during FY 2020, audit and wing on established higher education templates and models, and guided by the expertise of College staff and Trustees on the Audit and Risk Management Committee. This included. SJC's CBFO and CIO and Trustees experienced in Risk Management, business management, and higher education administration.

The risk register serves as a checklist for SJC's risk management activity, a common lens for analysis and consideration of risks, and a checklist to ensure appropriate remediation of major risks. Remediation includes directing community members' behavior, though policies and procedures, transferring risk, though insurance and contracts, and ensuring systems and physical assets are appropriately maintained and improved.

Financial reporting

SJC is organized as a 501©3 corporation and files Forms 990 and 990T with the IRS each year. These, and the annual audited financial statements are prepared by a CPS firm, which is selected through an RFP process, and is engaged by the Board Of Trustees Audit and Finance Committee, to which it reports.

Long term planning and new revenue sources

SJC recognizes the need to enhance its revenue and revitalize its educational offerings and experience through new initiatives. It has three initiatives currently active, Institute for Integrated Aging, Institute for Local Food System Innovation, Institute for Radical Hospitality. A subcommittee of the Board of Trustees (the Mission Aligned Business Committee) oversees this work, and essentially works as an investment committee to review full business plans and referrers proposals, as appropriate, to the Finance Committee and Full Board.

Endowment Spending Policy

The College has a conservative endowment spending policy of 4% on the rolling 36-month average.

Current Status of the Strategic Plan

The College undertook a review of the current strategic plan during the 2018-19 academic year and presented a set of recommendations for updating the plan to the Board of Trustees in the fall of 2019.

The Board accepted the recommendation that the plans Strategic Goals be reorganized to give priority to the goal of financial stability as a necessary precursor to the pursuit of any of the other goals. At the same time, the Board chose not to act on a recommendation to lower the strategic enrollment goals so as to better align with current demographic and market realities.

Instead, the Board asked the administration to develop an enrollment strategy that would return the campus enrollment level to 1,000 as soon as possible and then to develop a longer term strategy to achieve the original campus enrollment metric of 1,200. The Board also asked the administration to develop an enrollment model for the online programs that was realistic even while it assumed modest growth. The Board

recognized that progress in these areas would require additional investment and expressed the desire to see evidence of this investment in subsequent spending plans.

This work was underway when the emergence of pandemic required us to shift our primary focus to managing that situation and planning for a return to campus-based study for the current academic year.

However, the newly developed multi-year planning and budgeting model, while still in draft form, reflects this understanding of our enrollment for both the campus and the online programs.

The model is built on current year enrollment for both programs.

For the campus program, multiple scenarios are identified based on impossible impacts of the pandemic on the College' operations. One scenario assumes little continuing impact; a second assumes a reduction in enrollment as a result of the pandemic; and the third assumes a significant disruption to the College's operation with attendant loss of revenue primarily from the closure of the residence halls.

The most optimistic scenario is informed by the guidance of our new enrollment marketing partners, EAB, and achieves the 1000 student goal in FY25. The less optimistic scenarios use even more modest growth projections and arrive at a FY25 enrollment of 840.

For the online program, enrollment is also built on current results. The more optimistic scenario assumes annual growth of approximately 10%; the less optimistic scenarios assume no growth.

Projecting online enrollments have been a consistent challenge for several years as that part of the higher education marketplace has significantly changed. However, since FY17, improvements in the processes used to project enrollments in the College's online programs have increased the accuracy of that information. Table X.X shows the total projected online enrollments and the actuals for FY18, FY19, and FY20.

Online Enrollments: Projections vs. Actuals			
	FY18	FY19	FY20
Projection	6613	6117	5644
Actuals	6695	6131	5628

Results from FY21 through October show that currently, actual total enrollments are 15% above the YTD projections (1711 vs. 1487).

While the improved accuracy of online enrollment projections is a positive development, the continued decline of these enrollments is obviously a matter of concern. We recognize that the College needs to make a strategic investment in this part of our academic program so that it can better compete in an increasingly crowded marketplace.

The results of the November 2018 federal financial aid audit

In January 2017, the College contacted the Federal Department of Education to “self-report” errors in the way that financial aid was calculated for students in our online programs for the years 2012-13, 2013-14, 2014-15, and 2015-16. That “self-report” included remedial actions the College had taken to address the situation.

In October 2018, the DOE informed the College that it would conduct a Program Review during November of that year. As a result of that review, the College received on July 8, 2019 a PRR with five findings.

We submitted our response in November, 2019.

On September 9, 2020, the College was notified by DOE of its issuance of Final Program Review Determination Report. Findings 2-5 of the PRR were closed as a result of corrective actions taken by Saint Joseph's College.

Finding 1 resulted in an assessed liability of \$3,764.41. The College has repaid this amount to DOE and is awaiting notification that this finding has also been closed.

The Final Program Review Determination Report is included as Appendix B.

Conclusion

We are pleased to be able to share the information in this report with the Commission and the members of our evaluation team. We believe that, during this unprecedented time in our world, in our country, and in higher education, we need to continue to focus on the fundamental elements of accreditation--institutional quality and continuous

improvement. We value our continuing dialogue and partnership with NECHE and look forward to our comprehensive evaluation in the Fall of 2021 when we will be able to update the Commission on the institutional progress discussed in this report in the entire institutional context.

Scenarios and resource utilization increased

SIC - Cash Flow Projections			2021	2021	2021	2022	2022	2022	2023	2023	2024	2024	2025	2025
Scenarios and resource utilization increased			Scenario 1	Scenario 2	Scenario 3	Scenario 1	Scenario 2	Scenario 3	Scenario 1	Scenario 2	Scenario 1	Scenario 2	Scenario 1	Scenario 2
			Budgeted for 2020 (pre COVID)	COVID impact	residence closing 1 semester / furlough campus and unessential staff	Recover / rebuild from COVID. Start to address deferrals	COVID Impact Continues	residence closing 1 semester / furlough campus and unessential staff	Recover / rebuild from COVID	COVID impact - Resize	Recover / rebuild from COVID	COVID impact - Resize	Recover / rebuild from COVID	COVID impact - Resize
Assumptions														
Revenue														
Campus Students Revenue			change on 2019	change on 2019	change on 2019	change on 2021	change on 2021	change on 2021	change on 2022	change on 2022	change on 2023	change on 2023	change on 2024	change on 2024
Campus Students #			840	830	830	870	840	840	910	840	960	840	1000	840
% residents			75%	70%	70%	75%	70%	70%	75%	70%	75%	70%	75%	70%
% RA's (not paying room & board)			4.8%	5.2%	5.2%	4.8%	4.8%	4.8%	4.8%	4.8%	4.8%	4.8%	4.8%	4.8%
Tuition (campus)			36,720	36,720	36,720	1% 37,087	37,087	37,087	1% 37,458	37,458	1% 37,833	37,833	1% 38,211	38,211
Total average discount			51.3%	51.3%	51.3%	2% 53.3%	53.3%	53.3%	2% 55.3%	55.3%	0% 55.3%	55.3%	-1% 54.3%	56.3%
Room & Board			14,500	14,500	14,500	0% 14,500	14,500	14,500	0% 14,500	14,500	1% 14,645	14,645	1% 14,791	14,791
On-Line College														
OLC FTE Students			1,650	1,650	1,650	1,650	1,650	1,650	1,800	1,650	2,000	1,650	2,200	1,650
Average per credit			350	350	350	350	350	350	325	325	315	315	300	300
Total OLC Revenue														
Auxiliary and Other			change (\$MM)	change (\$MM)	change (\$MM)	change (\$MM)	change (\$MM)	change (\$MM)	change (\$MM)	change (\$MM)	change (\$MM)	change (\$MM)	change (\$MM)	change (\$MM)
Others			0.42	0.42	0.42	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Events			(0.90)	(0.90)	(0.90)	1.00	0.00	0.00	0.75	0.40	0.50	0.00	0.00	0.00
Advancement other			0.10	0.10	0.10	0.10	0.00	0.00	0.10	0.10	0.10	0.00	0.10	0.00
			0.30	0.30	0.30	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Employees														
% change # Faculty			-5.0%	-5.0%	-5.0%	0.0%	-5.0%	0.0%	0.0%	-3.0%	0.0%	-2.0%	0.0%	-3.0%
% faculty comp change yoy			1.5%	1.5%	1.5%	5.0%	2.0%	0.0%	5.0%	2.0%	5.0%	2.0%	5.0%	2.0%
% change # Staff			-12.5%	-12.5%	-12.5%	0.0%	-20.0%	0.0%	0.0%	-4.0%	0.0%	-5.0%	0.0%	-3.0%
Staff comp change YOY						6.0%	2%	0.0%	6.0%	3%	6.0%	2%	6.0%	2%
% change # Other						0.0%	0%	-20.0%	0.0%	0.0%	0.0%	0%	0.0%	0%
Other comp change YOY						2.0%	0.0%	0.0%	2.0%	2%	2.0%	2%	2.0%	2%
YOY change in operations			-8.0%	-15.0%	-25.0%	5.0%	0.0%	0.0%	5.0%	0.0%	5.0%	-2.0%	5.0%	0.0%
	Actual 2019	Actual 2020												
Revenue														
Campus Tuition			16.01	15.72	15.04	14.86	14.86	15.08	14.56	15.25	14.08	16.35	17.48	14.04
Room & Board			9.26	7.09	8.70	9.01	8.12	9.01	8.12	9.43	8.12	10.04	10.57	8.28
OLC Tuition			7.90	7.71	6.93	6.93	6.93	6.93	6.93	7.02	6.44	7.56	6.24	5.94
Other			4.09	3.57	4.01	4.01	4.01	5.11	4.01	5.86	4.41	6.46	4.41	6.56
Total			37.26	34.09	34.68	33.79	29.79	36.14	33.62	37.56	33.05	40.32	42.53	32.68
Expenses														
Compensation														
Faculty			8.07	8.10	7.78	7.78	7.78	8.17	7.54	7.78	8.58	7.53	9.01	7.45
Staff			13.95	12.62	12.21	12.21	11.16	12.94	11.83	9.77	13.71	11.21	14.54	10.86
Other (inc. students, contracts, temp)			1.86	2.08	1.86	1.86	1.488	1.90	1.86	1.49	1.94	1.90	1.94	1.97
Total comp and contracts			23.88	22.80	21.85	20.43	23.01	21.23	19.03	24.23	20.64	25.52	20.33	26.88
Operations			9.18	8.00	8.45	8.45	8.89	8.87	8.45	9.31	8.45	9.78	8.28	8.28
Interest			0.94	0.85	0.83	0.83	0.83	0.75	0.75	0.67	0.67	0.61	0.61	0.54
Cash flow (from operations)			3.26	2.44	3.55	3.31	1.65	3.51	3.20	1.34	3.35	3.29	4.41	4.83
Capital														
Principal			1.83	1.86	1.93	1.93	1.93	2.03	2.03	2.03	2.13	2.13	2.23	2.35
Maintenance / capital projects			0.82	0.90	0.85	0.85	0.85	0.85	0.85	0.85	1.00	0.95	1.50	0.95
			2.65	2.76	2.78	2.78	2.78	3.28	2.88	3.13	3.08	3.79	3.18	4.35
Surplus cash (after principal & maint)			0.61	-0.32	0.77	0.53	(1.13)	0.24	0.33	(1.54)	0.22	0.68	0.36	0.49
Quasi-endowment														
Balance			2.80	3.00	3.00	3.00	3.00	1.87	1.87	1.87	0.33	0.33	0.33	0.33
Draw			0.00	0.00	0.00	0.00	(1.13)	0.00	0.00	(1.54)	0.00	0.00	0.00	0.00
Ending balance			2.80	3.00	3.00	3.00	1.87	1.87	0.33	0.33	0.33	0.33	0.33	0.33
Debt														
			19.13	16.86	18.00	18.00	18.00	15.97	15.97	15.97				
DSC (times)			1.40	1.20	1.29	1.20	0.60	1.27	1.16	0.48	1.19	1.17	1.55	1.25
Increased resource utilization														
	Year 1	Year 2 (and beyond)	Impact on cash flow from operations			Impact on cash flow from operations			Impact on cash flow from operations		Impact on cash flow from operations		Impact on cash flow from operations	
	Implementation	Operation (stabilized)	Scenario 1	Scenario 2	Scenario 3	Scenario 1	Scenario 2	Scenario 3	Scenario 1	Scenario 2	Scenario 1	Scenario 2	Scenario 1	Scenario 2
Shared Services (by SIC to others)														
Shared services - cost base			5.68		5.68									
Shared cost % of existing			20%		20%									
Margin			5%		5%									
Revenue			1.19		1.19									
Transition cost (one time)			(0.68)	12%	0.00									
Incremental recurring cost			(0.60)	50%	(0.60)									
Cost saving			0.00	of revenue	0.00									
Surplus cash			(0.09)		0.60	0.69	0.44	(1.22)	Year 2 0.83	0.92	(0.94)	0.81	0.81	1.08
* assumes SIC bears transition cost														0.92
Shared Services (by others to SIC)														
Shared services - cost base			5.68		5.68									
Shared cost % of existing			50%		50%									
Economies of scale			20%		20%									
Revenue			0.00		0.00									
Transition cost (one time)*			(0.57)	10%	0.00									
Cost to outsource			(2.27)		(2.27)									
Cost saved			2.84		2.84									
Incremental recurring cost saving														
Surplus cash			0.00		0.57	0.77	0.53	(1.13)	0.80	0.89	(0.97)	0.79	0.78	1.06
* assumes SIC bears transition cost														0.90
Co-location other organization on campus														
Shared services - cost base			7.62		7.62									
Shared cost %			25%		25%									
Transition cost (one time)			(0.91)		0.00									
Incremental recurring costs			0.00	0%	0.00									
Shared cost (saving to SIC)			1.90		1.90									
Surplus cash			0.99		1.90	1.76	1.52	(0.14)	2.14	2.23	0.36	2.12	2.11	2.39
* assumes SIC bears transition cost														2.23



September 3, 2020

Dr. James Dlugos
Saint Joseph's College
278 Whites Bridge Road
Standish, ME 04084-5236

RE: **Final Program Review Determination Report**
OPE ID: 002051
PRCN: 201910229950

Dear Dr. Dlugos:

The U.S. Department of Education's (Department's) Office of Federal Student Aid issued a program review report on June 28, 2019 covering Saint Joseph's College of Maine's (SJC) administration of programs authorized by Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2015-2016 and 2016-2017 award years. SJC's final response was received on November 12, 2019. A copy of the program review report (and related attachments) and SJC's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by SJC upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

Purpose:

Final determinations have been made concerning all of the outstanding findings of the program review report. The purpose of this letter is to: (1) identify liabilities resulting from the findings of this program review report, (2) provide instructions for payment of liabilities to the Department, (3) notify the institution of its right to appeal, and (4) close the review.

The total liabilities due from the institution from this program review are \$3,764.41.

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

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.

Appeal Procedures:

If SJC elects to appeal to the Secretary of Education for a review of the financial liabilities established by this FPRD, the institution must file a written request for a hearing. Please note that institutions may appeal financial liabilities only. The Department must receive SJC's request no later than 45 calendar days from the date SJC receives this FPRD. **The Department requests that SJC submit an original and four copies of its complete request for review.** The request must be sent to:

Attn: Susan Crim, Director
Administrative Actions and Appeals Service Group
U.S. Department of Education
Federal Student Aid/Partner Enforcement and Consumer Protection
830 First Street, NE UCP3, Room 84F2
Washington, DC 20002-8019

SJC's appeal request must:

- (1) indicate the findings, issues, and facts being disputed;
- (2) state the institution's position, together with pertinent facts and reasons supporting its position; and
- (3) include a copy of the FPRD received by the school.

When it submits its request for appeal, the institution may also include documentation it believes the Department should consider in support of the appeal, **Please note that any additional documentation submitted with the institution's appeal request, other than items 1-3 above,**

will only be used by the Administrative Actions and Appeals Service Group (AAASG) to determine whether the appealed liabilities can be resolved or reduced prior to the

transmittal of the appeal to the Department's Office of Hearings and Appeals (OHA). As a result, please submit **no more than three copies** of any additional documentation, other than items 1-3 above, that the institution would like to have informally considered. The additional documentation, not part of items 1-3 above, provided with the institution's appeal request will NOT be delivered to OHA as part of the appeal request. Instead, the parties will submit filings to OHA (including any supporting documentation) in accordance with the Hearing Official's orders after the matter has been assigned to the official, as described below.

If any appeal documents include personally identifiable information (PII), the PII must be redacted, except for the student's name and last four digits of his/her social security number (please see the enclosed document, "Protection of Personally Identifiable Information," for instructions on how to mail records containing PII).

If the institution's appeal is timely, **and there remains unresolved liabilities after review by AAASG** the request for appeal will be transmitted to the Department's Office of Hearings and Appeals (OHA), for an administrative hearing in accordance with § 487(b)(2) of the HEA, 20 U.S.C. § 1094(b)(2). The Hearing Official assigned to the case will issue an order scheduling the submission of briefs and supporting evidence in accordance with 34 C.F.R. § 668.114(c). The institution may therefore submit additional documentation supporting its appeal request at that time. Further, if the institution is appealing a projected liability amount, it may provide detailed liability information from a complete file review, either at the time it initially submits its appeal request or pursuant to the proceedings at OHA. The procedures followed with respect to SJC's appeal are those provided at 34 C.F.R. Part 668, Subpart H. Interest on the appealed liabilities shall continue to accrue at the applicable value of funds rate, as established by the United States Department of Treasury, or if the liabilities are for refunds, at the interest rate set forth in the loan promissory note(s).

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. §§ 668.24(e)(1), (e)(2), and (e)(3).

The Department expresses its appreciation for the courtesy and cooperation extended during the review. If the institution has any questions regarding this letter, please contact Sherry Blackman

at 404-682-3297 or at Sherry.Blackman@ed.gov. Questions relating to any appeal of the FPRD should be directed to the address noted in the Appeal Procedures section of this letter.

Sincerely,

A handwritten signature in black ink that reads "Betty Coughlin". The script is cursive and fluid.

Betty Coughlin
Division Chief

Enclosure:
Protection of Personally Identifiable Information
Final Program Review Determination Report (and appendices)

cc: Rhonda Mynahan, Financial Aid Administrator
Maine Department of Education
New England Commission of Higher Education
Department of Defense
Department of Veterans Affairs
Consumer Financial Protection Bureau

Prepared for

Saint Joseph's College

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

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OPE ID 00205100

PRCN 2019-1-02-29950

Prepared by

U.S. Department of Education

Federal Student Aid

School Participation Division – New York/Boston

Final Program Review Determination

September 3, 2020

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A. Institutional Information

Saint Joseph's College
278 Whites Bridge Road
Standish, ME 04084-5236

Type: Private, Non-Profit

Highest Level of Offering: Master's or Doctorate

Accrediting Agency: New England Commission of Higher Education

Student Enrollment: 2604 (2018-2019)

Percentage of Students Receiving Title IV: 52% (2018-2019)

Title IV Participation PEPS:

	<u>2017-2018</u>
Pell Grant	\$1,511,676.00
Federal Supplemental Educational Opportunity Grant	\$187,977.00
Federal Work Study	\$108,798.00
Federal Direct Student Loan Program	\$19,739,863.00

Default Rate FFEL/DL:	2016	3.3%
	2015	2.9%
	2014	4.6%

Default Rate Perkins:	6/30/2017	12.2%
	6/30/2016	18.5%
	6/30/2015	12.5%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Saint Joseph's College (SJC) from November 26, 2018 to November 30, 2018. The review was conducted by Sherry Blackman and Debra Knight-Brown.

The focus of the review was to determine SJC's compliance with specific regulations as they pertain to the institution's administration of the Federal student aid programs under Title IV of the Higher Education Act of 1965, as amended, U.S.C. §§ 1070 et seq. (Title IV programs). SJC notified the Department on January 27, 2017 that the school made errors in administering Title IV funds when awarding their online students that were enrolled in non-term programs. Therefore, the review was focused on an examination of SJC's compliance with awarding their online students in non-term programs (34 C.F.R. §690.63(a) and (e)).

The Department identified a sample of 30 files for review from the 2015-2016, 2016-2017 and 2018-2019 award years through November 30, 2018. The Department randomly selected the files from a statistical sample of the total population of online students receiving Title IV, HEA program funds for the 2015-2016 and 2016-2017 award years and all students for the 2017-2018 award year. Appendix A lists the names and social security numbers of the students whose files were examined during the program review.

The Department issued its Program Review Report (PRR) on June 28, 2019 (Appendix B). SJC submitted its written response to the PRR on November 12, 2019 ("Response"), included in Appendix C. SJC's response was complete, and included supporting documents.

Disclaimer:

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

C. Final Determinations

Resolved Findings/Findings without Liabilities

Findings 2 - 5

SJC has taken the corrective actions necessary to resolve findings 2 - 5 of the PRR. Therefore, these findings may be considered closed. SJC's written response is attached as Appendix C.

Resolved Findings

Finding 2: Inaccurate and Untimely Enrollment Reporting to National Student Loan Database System (NSLDS)

Finding 3: Missing Exit Counseling for Direct Loans

Finding 4: Inaccurate Common Origination and Disbursement (COD) Reporting

Finding 5: Inaccurate Record Keeping Regarding Title IV Credit Balance

Finding with Established Liabilities

The PRR finding with liabilities requiring further action is summarized below. At the conclusion of the finding is a summary of SJC's response to the finding, and the Department's final determination. A copy of the PRR issued on June 28, 2019 is attached as Appendix A.

Note: Any additional costs to the Department, including interest, special allowances, cost of funds, unearned administrative cost allowance, etc., are not included in the individual finding, but instead are included in the summary of liabilities table in Section **D** of the report.

Finding 1. Standard Term and Borrower-Based Award Year Used Incorrectly

Summary of Noncompliance: Generally, if all the coursework is scheduled to be completed within a specific time frame, the program can be considered term-based. Term-based programs can have either standard terms or nonstandard terms (Federal Student Handbook, Volume 3). Pell Grants are usually calculated differently for the two types of terms. Standard term programs may be treated similarly to nonstandard term programs if the program does not conform to a traditional academic calendar or meet certain other conditions. When calculating Pell Grants, an institution must use the same formula for all years in a student's program. If any of the terms in a program contain a class which begins and/or ends a total of more than two weeks before or after the start of a standard term, the program must be considered a nonstandard term program for Title IV purposes.

Standard terms are semesters, trimesters, or quarters, as these words are traditionally used. In traditional usage, an individual semester or trimester provides about 14 to 17 weeks of instructional time and full-time is defined as at least 12 semester or trimester hours. The program's academic calendar generally consists of three terms, one each in fall, spring, and summer. In traditional usage of the term "quarter," an individual quarter

provides about 10 to 12 weeks of instructional time, and full-time is defined as at least 12 quarter hours. The program's academic calendar generally includes three quarters in the fall, winter, and spring, and often a summer quarter as well.

Any term that isn't one of the standard terms described above is a nonstandard term. Sometimes schools refer to terms by standard names when they are, in fact, nonstandard terms. For example, a program may be made up of terms called quarters, but progress is measured in semester hours. If a student's program contains any nonstandard terms, it cannot be considered a standard term program.

Non-term programs may be measured in either clock-hours or credit-hours. If a student's program contains coursework not offered for completion within set beginning and end dates, the program cannot be considered a term-based program.

Federal Pell Grant Awards

For purposes of awarding Federal Pell Grants, a non-term program must use Pell Grant Formula 4 (34 C.F.R. §690.63(a) and (e)). To determine the payment amount of a payment period, a school must multiply the student's Scheduled Award by the lesser of (1) the number of credit hours in the payment period divided by the number of credit/clock hours in the program's academic year or (2) the number of weeks of instruction in the payment period divided by the number of weeks in the programs' academic year. A credit-hour program's academic year must include at least 30 weeks of instruction to be eligible for federal student financial aid.

A program that measures progress in credit hours must use a non-term academic calendar for administration of Title IV aid if it has:

- Terms that overlap within an academic program;
- Courses that do not begin and end within a set period of time;
- Courses that overlap terms;
- Self-paced and independent study courses that overlap terms; or
- Sequential courses that do not begin and end within a term

For a program with a traditional academic calendar, the program:

- must have an academic calendar that consists, in the fall through spring, of two semesters or trimesters, or three quarters (note that summer may not be a standard term);
- must have at least 30 weeks of instructional time in fall through spring terms;
- must not have overlapping terms; and
- must define full-time enrollment for each term in the award year as at least 12 credit-hours and must measure progress in credit-hours.

See 34 C.F.R. §690.63 (a) and (e) and 34 C.F.R. §690.80(b)(2).

Federal Direct Loan Awards (DL)

The rules for awarding Direct Loans are different than for Pell Grants and other FSA programs. The loan period, payment period, and disbursements within that period may not always correspond to the payment periods used for Pell Grants. The requirement to prorate Direct Subsidized/Unsubsidized Loan limits under certain circumstances is different than the requirements for calculating Pell Grants.

All clock-hour programs, non-term credit-hour programs, and nonstandard-term programs with terms that are not SE9W (a program with terms substantially equal in length, with each term comprised of 9 or more weeks of instructional time) must use a Borrower-Based Academic Year (BBAY) that meets the minimum requirements for an academic year. That is, the BBAY must contain at least 30 (or, for clock-hour programs, 26) weeks of instructional time and at least the minimum number of credit or clock-hours: for undergraduate programs, 24 semester or trimester hours, 36 quarter-hours, or 900 clock-hours; for graduate programs, the number of hours a student would complete under the school's full-time standard in the weeks of the Title IV academic year, which must be a minimum of 30 weeks of instructional time, or, for clock-hour programs, at least 26 weeks of instructional time. This requirement also applies to a program that consists of both standard and nonstandard terms and that does not qualify to use a Standard Academic Year (SAY).

The BBAY begins when a student enrolls and does not end until the later of the date the student successfully completes the hours in the academic year or the number of weeks of instructional time in the academic year.

Because a student must successfully complete the minimum number of hours or weeks of instructional time in an academic year (whichever comes later) before a new BBAY begins, a student's enrollment status may affect how soon the student regains eligibility for a new annual loan limit. For example, a student who is attending part-time will take longer to complete a BBAY than a full-time student. (In contrast, an SAY or BBAY for a standard term program, or a non-standard SE9W program ends when the *calendar period* associated with the terms in the SAY or BBAY has elapsed, regardless of how many credit-hours or weeks of instruction the student completed during the SAY or BBAY.)

For a non-term program, a student may not receive a subsequent loan disbursement until he or she completes the minimum number of instructional weeks and credit hours in the program's academic year.

See 34 C.F.R. §685.102 (b) and 34 C.F.R. §685.301 (a) (10)

SJC reported that it offers educational programs in a 100% online modality. The online degrees are offered at the undergraduate and graduate levels and are measured in credit

hours. Prior to July 1, 2016, most online undergraduate and graduate programs were comprised of courses that were 15 weeks in length and students earned 3 semester credit hours for the successful completion of each course.

The Nursing (graduate and undergraduate) and Master of Business Administration (MBA) were structured as follows:

Nursing -program courses were 12 weeks in length and students earned 3 or 4 credits depending on the course.

MBA – program courses were 10 weeks in length and students earned 3 semester credits.

In addition, some online programs involve a capstone course. At the undergraduate level, these programs are Nursing, Radiology, Theology, and master's in education (MSEd) programs have capstone courses. Capstone courses entail research and special projects. Prior to July 1, 2016, these courses were structured to treat a student as enrolled in a capstone course for a period that extended across multiple 15-week terms. Programs in Nursing, Radiology, and Theology included capstone and practicum courses that could span as long as 67 weeks and awarded 3 semester credit hours upon successful completion of the course.

According to SJC, it wasn't until the departure of the former Financial Aid Director, after July 1, 2016, they discovered that SJC had no restrictions in place that would prevent students from enrolling in multiple courses with various start and end dates, and in some cases, students enrolled in courses that overlapped terms (i.e. students began new courses before the previous courses ended). In addition, the capstone programs, which required students to complete research and other courses, did not begin and end within a term, but rather extended across multiple terms.

Upon discovering that there were no restrictions preventing students from enrolling in multiple and overlapping courses, SJC hired Huron Consulting Group (Huron) to conduct a review of the school's administration of Title IV programs for the 2012-2013, 2013-2014, 2014-2015, and 2015-2016 award years. The purpose of Huron's review was to determine (1) whether SJC had awarded and disbursed federal student aid to online students in accordance with the Department's regulations and (2) to what extent SJC did not award and disburse federal student aid in accordance to the Department's regulation.

Huron's review determined that the structure of SJC's online programs met the definition of a program with a non-term academic calendar due to the fact that some courses overlapped terms and some courses (e.g. capstone courses) did not begin and end within a set period. Therefore, Huron believed Title IV should have been awarded in accordance with Title IV requirements for non-term programs (i.e. using Pell formula 4 and Borrower-Based Academic Year ("BBAY3")). However, during the period under review, SJC administered Title IV aid based on a standard term academic calendar (i.e.

students were awarded as if they were enrolled in standard semester terms). SJC admitted to developing procedures that awarded aid based on an online student's course enrollment, awarding Federal Pell Grants (Pell) reflective of a student's course enrollment, and calculating awards using Pell Formula 1. SJC awarded Federal Direct Loans (DL) using BBAY 1 to determine when a student was eligible for a new annual loan limit. An institution may alternate between BBAY1 and SAY only, provided academic years do not overlap.

Huron's assessment found the following:

- SJC defined their academic year as follows
 - Traditional program - 24 credits/30 weeks (Fall/Spring)
 - On-line:
 - 12-week undergraduate program - 36 credits/36 weeks (3 terms)
 - 12-week graduate program - 18 credits/36 weeks (3 terms)
 - 10-week graduate program - 24 credits/40 weeks (4 terms)
- SJC's practice was to award and disburse Title IV aid to students on a term-by-term basis. After a student registered for courses, the Financial Aid Office (FAO) awarded financial aid to meet the tuition, fee, and book expenses for those courses for that term.
- SJC would increase the financial aid award to meet the living expense component of the cost of attendance, if the student requested such an increase. A student's eligibility for financial aid was based on the number of credits that the student would earn for the courses in which the student was enrolled for that term. A student payment period began with the first day of enrollment. For example, if a student began enrollment on 8/1/2015 and ended on 11/14/2015, the payment period for DL was 8/1/2015-11/14/2015.
- For DL awards, when a student enrolled in a second set of courses, a new loan was originated with the loan period matching the beginning and ending date of the second set of courses. Therefore, the loan period would be different for each loan certified on a student's behalf. In this scenario, students were provided two loans that equaled a term's worth of aid, but with two different loan periods. The academic level of loan progression was established following the completion of two terms of enrollment.
- For Pell awards, SJC similarly treated each set of courses as a payment period. Thus, if a student were to enroll in 12 credits (full time) beginning 8/1/2015 and ending on 11/14/2015, SJC treated the student as ineligible for Pell again until after the 15-week period had expired (after 11/14/2015). If a student were to enroll in 6 credits (half-time) on 8/1/2015 and then another 6 credits on 10/1/2015, the student would receive Pell for ½ time status according to the Pell Formula 1, for the 8/1/2015 courses and Pell for ½ time status, according to Pell Formula 1, for the 10/1/2015 courses. Such student would receive the same total amount of the Pell grant as the student who took 12 credits beginning on 8/1/2015.

During the Department's review of SJC's administration of Title IV programs, the reviewers discovered findings equivalent to that of Huron's. The Department found that SJC did not ensure that their graduate online students completed at least half-time credit hours and 15 weeks of instruction before making subsequent loan disbursements.

Additionally, SJC did not confirm that a student completed both the necessary credit hours in an academic year and weeks of instruction before originating a new BBAY 3 loan. As a result, some online graduate students received subsequent disbursements within a payment period, and a new loan period was initiated prior to students completing the required credit hours and weeks of instructional time. For example, the following online graduate student was included in this finding:

Student 3: Student 3 was enrolled in the online MBA program for the 2015-2016 academic year for the following terms:

Terms	Loan Disbursement Date	Credit Hours	Weeks	Days	Loan Amounts Certified and Disbursed
7/29/2015 through 10/6/2015	9/15/2015	3	9	6	\$4,091
10/7/2015 through 12/15/2015	11/9/2015	3	9	6	\$4,091
1/18/2016 through 4/11/2016	2/16/2016	3	13	3	\$4,090
4/18/2016 through 7/11/2016	Pending as of 11/20/2018	3	12	0	\$4,939

The student was enrolled in 3 hours each “term”, which, according to the student’s award letter, is considered half-time for graduate students. Although the student completed the required hours, SJC did not require the student to complete 12 weeks prior to making a subsequent disbursement for the first two terms listed above; therefore not meeting the definition of a standard term.

As a result of the Huron’s review, SJC accepted and self-reported the following findings to the Department:

- During the review period, SJC did not award Pell using Pell Formula 4 and did not use BBAY3 for certification of Federal Direct Loans for students enrolled in SJC’s online programs, which were structured as non-term programs. As a result, some students were awarded Title IV in which they were ineligible.
- With regard to Pell, SJC did not use Pell Formula 4 and therefore did not consider the students’ actual enrollment when prorating the students’ scheduled award. As a result, SJC under-awarded Pell to students who were enrolled in less than 12 hours (full time) but more than the minimum for each enrollment level (6 credit hours for half-time and 9 credit hours for three-quarter time). Pell awards were calculated incorrectly and resulted in students being under-awarded.
- With regard to Direct Loans, SJC did not confirm that undergraduate online students had successfully completed at least 12 credit hours and 15 instructional weeks before making subsequent disbursements. In addition, SJC did not confirm that graduate online students

completed at least 6 credit hours and 15 weeks of instruction before making subsequent disbursements. SJC did not confirm that weeks of instruction were completed before originating a new BBAY3 loan. As a result, some online students received subsequent disbursements within the same payment period and a new loan was certified prior to students completing the required credit hours and weeks of instructional time

- **Graduate Student File Review:** A random sample was taken of 80 graduate students, including 40 students who had courses that overlapped and 40 students who did not have courses that overlapped. As a result, 2 graduate students were disbursed Direct Loans for which they were ineligible. The total liability loan amount was \$20,902. In addition, 2 separate graduate students were disbursed Direct Loan payments earlier than the correct scheduled time. This resulted in a liability of \$1,469.
- **Undergraduate Student File Review:** A random sample was selected of online undergraduate students who received Pell Grant funds during the Review period in which Huron tested, plus a random sample of (5 students total) who had overlapping and non-overlapping courses and did not receive Pell Grants. The following results were determined:
 - 9 undergraduate students were determined to be ineligible for all Federal Pell Grant funds disbursed to them. The total ineligible Pell Grant amount was \$14,228.
 - 15 undergraduate students received Pell Grants at an amount that was less than what would have been calculated according to Pell Formula 4. The total amount of underfunding for undergraduate Pell students in the review population was \$7,475.
 - 10 undergraduate students received Pell Grants at an amount that was more than would have been calculated according to Pell Formula 4. The total amount over awarded for undergraduate Pell students in the review population was \$8,207.
 - 7 undergraduate students were disbursed Direct Loans for which they were determined to be ineligible. The total ineligible loan amount totaled \$38,143.

48 undergraduate students received early disbursements (43 students received subsidized and 17 unsubsidized). The total amount of loan funds that were disbursed early was \$168,278. Huron's report did not specify whether the students eventually earned the funds disbursed.

Directives from PRR: SJC self-reported that they awarded and disbursed Title IV aid to students using standard terms instead of non-standard terms to students enrolled in their online undergraduate and graduate programs. All Title IV aid disbursed to online undergraduate and graduate students for 2015-2016 and 2016-2017 award years used incorrect awarding criteria, and those incorrect calculations resulted in under-awards and over-awards for many of the students.

SJC was required to review the files for all online undergraduate and graduate Title IV recipients for 2015-2016 and 2016-2017 award years, including the recipients included in this PRR and the Huron report, in order to verify if the disbursements made to these students were accurate. SJC had to compile the results of its file review in an Excel spreadsheet as detailed in the PRR.

SJC was required to include with its response copies of source documents containing loan origination and disbursement information, Pell disbursement information, student account ledgers, and student academic transcripts (determination of grade level and subsequent payment period).

In addition, SJC was required to provide a comprehensive set of policies and procedures that indicated how it would administer the online, non-term programs. The policies had to outline how SJC defines its academic year and detail the credit hours of instruction that comprise each payment period for all versions of its programs. Additionally, SJC had to indicate the process it will use to identify when a student is eligible for all disbursements.

Analysis of Liability Determination: Final Determination

As requested, SJC conducted and submitted the required file review for all online undergraduate and graduate Title IV recipients for the 2015-2016 and 2016-2017 award years. SJC also provided copies of source documents containing loan origination and disbursement information, Pell disbursement information, student account ledgers, and student academic transcripts (determination of grade level and subsequent payment period).

SJC revised its Academic Year definitions, Costs of Attendance, and EFCs for 1201 students (duplicated) in both 2015-2016 and 2016-2017 award years. After applying the new parameters and conducting the file review for both award years to its online student population, SJC determined that it over awarded and disbursed \$12,355.00 in Federal Subsidized Loans to 5 students. The file review indicated that SJC did not over award Pell grant funds for this finding.

In addition, SJC submitted revised policies that outline how SJC defines its academic year and details the credit hours of instruction that comprise each payment period for all versions of its programs. As of 2017-2018, SJC has defined their academic year as the following:

Undergraduates: 36 weeks/36 credits

Graduates: 36 weeks/18 credits or 40 weeks/24 credits

Also, SJC stated that the internal review that was conducted by Huron was at the direction of their legal counsel, Hogan & Lovells. It was counsel that retained Huron to assist with the review, communicated with it, and directed its efforts. According to SJC,

Huron reviewed only one award year, 2015-2016. SJC stated that it is not in possession of Huron's underlying sample student-level data. Because the file review that was required by the Department was more detailed and covered both 2015-2016 and 2016-2017 award years, and Huron did not conduct its file review according to the Department's procedures, the Department will rely on the results of the file review results received from SJC.

The Department has reviewed all documentation submitted by SJC regarding this finding and confirmed its accuracy.

Estimated Loss

The total amount of Direct Loan that SJC improperly disbursed during the 2015-2016 and 2016-2017 award years) for this finding is \$12,355.00. However, in lieu of requiring the institution to assume the risk of default by purchasing the ineligible loans from the Department or asserting a liability for the entire loan amount, the Department has asserted a liability for the estimated loss (EL) that the government may incur with respect to the ineligible loans. The estimated loss is calculated based on the relationship between SJC's cohort default rate and the sector cohort default rate. As a result, the estimated loss that SJC must pay to the Department for these ineligible loans is \$3,764.41. Appendix D contains the results of the calculation of the EL.

D. Summary of Liabilities

The total amount calculated as liabilities from the findings in the program review determination is as follows.

Liabilities	DL / FFEL	ELF DL
Finding 1	\$12,355.00	\$3,764.41
Subtotal 1	\$12,355.00	\$3,764.41
TOTAL	\$0.00	\$3,764.41
Payable To:		
Department		\$3,764.41

Estimated Loss (EL):

Estimated Loss (EL): For Finding 1, the table above includes an estimated amount of actual loss rather than the total amount of ineligible loan funds as explained in the Final Determination section for this finding.

E. Payment Instructions

Liabilities Owed to the Department

SJC owes to the Department \$3,764.41. Payment must be made by forwarding a check made payable to the "U.S. Department of Education" to the following address within 45 days of the date of this letter:

U.S. Department of Education
P.O. Box 979026
St. Louis, MO 63197-9000

Remit checks only. Do not send correspondence to this address.

If the check is sent special delivery (signature/receipt required), the check must be sent to the following address:

U.S. Bank
1005 Convention Plaza
St. Louis, MO 63101
Attn: Govt. Lockbox Tram MO-SL-C2GL
Re: For Dept. of Ed. 979026

Payment must be made via check

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

The following identification data must be provided with the payment:

Amount: \$3,764.41
DUNS: 071750079
TIN: 010212542
Program Review Control Number: 2019-1-02-29950

Terms of Payment

As a result of this final determination, the Department has created a receivable for this liability and payment must be received by the Department within **45 days of the date of this letter**. If payment is not received within the 45-day period, interest will accrue in monthly increments from the date of this determination, on the amounts owed to the Department, at the current value of funds rate in effect as established by the Treasury Department, until the date of receipt of the payment. SJC is also responsible for repaying any interest that accrues. If you have any questions regarding interest accruals or payment credits, contact the Department's Accounts Receivables & Bank Management Group at (202) 245-8080 and ask to speak to SJC's account representative.

If full payment cannot be made within **45 days** of the date of this letter, contact the Centralized Receivables Service (CRS) at 1-855-549-2683 to apply for a payment plan. Interest charges and other conditions apply.

If within 45 days of the date of this letter, SJC has neither made payment in accordance with these instructions nor entered into an arrangement to repay the liability under terms satisfactory to the Department, the Department intends to collect the amount due and payable by administrative offset against payments due **SJC** from the Federal Government. SJC **may object to the collection by offset only by challenging the existence or amount of the debt**. To challenge the debt, SJC must **timely appeal** this determination under the procedures described in the "Appeal Procedures" section of the cover letter. The Department will use those procedures to consider any objection to offset. **No separate appeal opportunity will be provided**. If a timely appeal is filed, the Department will defer offset until completion of the appeal, unless the Department determines that offset is necessary as provided at 34 C.F.R. § 30.28. This debt may also be referred to the Department of the Treasury for further action as authorized by the Debt Collection Improvement Act of 1996.

William D. Ford Federal Direct Loan (Direct Loan) Liabilities:

Direct Loan Estimated Loss

Finding: 1
Appendix: D1

DL Estimated Loss	
Amount	Award Year
\$2,949.87	2015-2016
\$814.54	2016-2017
Total	
\$3,764.41	

SJC must pay the amount reflected above in Direct Loan estimated loss liabilities for the award year reflected above. The liabilities will be applied to the general Direct Loan fund. This amount is also reflected in the total amount owed to the Department in Section 1 above.

F. Appendices

Appendices A, Student Sample, and C, Institution's Written Response (including the file review report), contain personally identifiable information and will be emailed to SJC as an encrypted WinZip file using Advanced Encryption Standard, 256-bit **upon confirmation of a secure email address.** The password needed to open the encrypted WinZip file(s) will be sent in a separate email.

Appendices B, and D1 are attached to this report.



June 28, 2019

Dr. James Dlugos
Saint Joseph's College
278 Whites Bridge Road
Standish, ME 04084-5236

Certified Mail Return Receipt Requested
Tracking #7006 2760 0002 1734 5446

RE: Program Review Report
OPE ID: 002051
PRCN: 201910229950

Dear Dr. Dlugos:

From November 26, 2018 through November 30, 2018, Sherry Blackman and Debra Knight-Brown as representatives of the U.S. Department of Education conducted a review of Saint Joseph College's (SJC'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 SJC. The response should include a brief, written narrative for each finding that clearly states SJC's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, SJC 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 report¹ 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.

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

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).

inspection by SJC 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 Sherry Blackman of this office within 60 calendar days of receipt of this letter.

Protection of Personally Identifiable Information (PII):

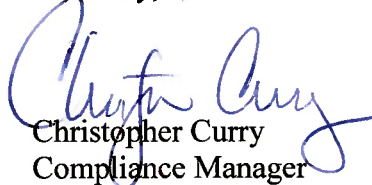
PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity 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.

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 Sherry Blackman at 202-377-3873 or Sherry.Blackman@ed.gov.

Sincerely,



Christopher Curry
Compliance Manager

cc: Rhonda Mynahan, Financial Aid Administrator

Enclosure:

Program Review Report (and appendices)
Protection of Personally Identifiable Information
File Review Sample

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 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 Win Zip 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 and electronic files 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.

Prepared for
Saint Joseph's College

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

PROUD SPONSOR of
the AMERICAN MIND™

OPE ID 002051
PRCN 201910229950

Prepared by
U.S. Department of Education
Federal Student Aid
School Participation Division-New York/Boston

Program Review Report

June 28, 2019

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A. Institutional Information

Saint Joseph's College
278 Whites Bridge Road
Standish, ME 04084-5236

Type: Private, Non-Profit

Highest Level of Offering: Master's or Doctorate

Accrediting Agency: New England Commission of Higher Education

Current Student Enrollment: 2604 (2018-2019)

Percentage of Students Receiving Title IV: 52% (2018-2019)

Title IV Participation PEPS:

	2016-2017
Pell Grant	\$14,435,392.00
Federal Supplemental Educational Opportunity Grant	\$170,931.00
Federal Work Study	\$127,076.00
Federal Direct Student Loan Program	\$14,232,347.00

Default Rate FFEL/DL:	2015	2.9%
	2014	4.6%
	2013	4.9%

Default Rate Perkins:	6/30/2017	12.2%
	6/30/2016	18.5%
	6/30/2015	12.5%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Saint Joseph's College (SJC) from November 26, 2018 to November 30, 2018. The review was conducted by Sherry Blackman and Debra Knight-Brown.

The focus of the review was to determine SJC's compliance with specific regulations as they pertain to the institution's administration of the Federal student aid programs under Title IV of the Higher Education Act of 1965, as amended, U.S.C. §§ 1070 et seq. (Title IV programs). SJC notified the Department on January 27, 2017 that the school made errors in administering Title IV funds when awarding their online students who were enrolled in non-term programs. Therefore, the review was primarily focused on an examination of SJC's compliance with awarding their online students in non-term programs (34 C.F.R. §690.63(a) and (e)).

The Department identified a sample of 30 files for review from the 2015-2016, 2016-2017 and 2018-2019 award years through November 30, 2018. The Department randomly selected the files from a statistical sample of the total population of online students receiving Title IV, HEA program funds for the 2015-2016 and 2016-2017 award years and all students for the 2017-2018 award year. Appendix A lists the names and 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 SJC'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 SJC 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 SJC to bring operations of the financial aid programs into compliance with the statutes and regulations.

Finding 1. Standard Term and Borrower-Based Award Year Used Incorrectly

Citation: Generally, if all the coursework is scheduled to be completed within a specific time frame, the program can be considered term-based. Term-based programs can have either standard terms or nonstandard terms (2015-16 Federal Student Handbook, Volume 3). Pell Grants are usually calculated differently for the two types of terms. Standard term programs may be treated similarly to nonstandard term programs if the program does not conform to a traditional academic calendar or meet certain other conditions. When calculating Pell Grants, an institution must use the same formula for all years in a student's program. If any of the terms in a program contain a class which begins and/or ends a total of more than two weeks before or after the start of a standard term, the program must be considered a nonstandard term program for Title IV purposes.

Standard terms are semesters, trimesters, or quarters, as these words are traditionally used. In traditional usage, an individual semester or trimester provides about 14 to 17 weeks of instructional time and full-time is defined as at least 12 semester or trimester hours. The program's academic calendar generally consists of three terms, one each in fall, spring, and summer. In traditional usage of the term "quarter," an individual quarter provides about 10 to 12 weeks of instructional time, and full-time is defined as at least 12 quarter hours. The program's academic calendar generally includes three quarters in the fall, winter, and spring, and often a summer quarter as well.

Any term that isn't one of the standard terms described above is a nonstandard term. Sometimes schools refer to terms by standard names when they are, in fact, nonstandard terms. For example, a program may be made up of terms called quarters, but progress is measured in semester hours. If a student's program contains any nonstandard terms, it cannot be considered a standard term program.

Non-term programs may be measured in either clock-hours or credit-hours. If a student's program contains coursework not offered for completion within set beginning and end dates, the program cannot be considered a term-based program.

Federal Pell Grant Awards

For purposes of awarding Federal Pell Grants, a non-term program must use Pell Grant Formula 4 (34 C.F.R. §690.63(a) and (e)). To determine the payment amount of a payment period, a school must multiply the student's Scheduled Award by the lesser of (1) the number of credit hours in the payment period divided by the number of credit/clock hours in the program's academic year or (2) the number of weeks of instruction in the payment period divided by the number of weeks in the programs' academic year. A credit-hour program's academic year must include at least 30 weeks of instruction to be eligible for federal student financial aid.

A program that measures progress in credit hours must use a non-term academic calendar for administration of Title IV aid if it has:

- Terms that overlap within an academic program;
- Courses that do not begin and end within a set period of time;
- Courses that overlap terms;
- Self-paced and independent study courses that overlap terms; or
- Sequential courses that do not begin and end within a term

For a program with a traditional academic calendar, the program:

- must have an academic calendar that consists, in the fall through spring, of two semesters or trimesters, or three quarters (note that summer may not be a standard term);
- must have at least 30 weeks of instructional time in fall through spring terms;
- must not have overlapping terms; and
- must define full-time enrollment for each term in the award year as at least 12 credit-hours and must measure progress in credit-hours.

See 34 C.F.R. §690.63 (a) and (e) and 34 C.F.R. §690.80(b)(2).

Federal Direct Loan Awards (DL)

The rules for awarding Direct Loans are different than for Pell Grants and other FSA programs. The loan period, payment period, and disbursements within that period may not always correspond to the payment periods used for Pell Grants. The requirement to prorate Direct Subsidized/Unsubsidized Loan limits under certain circumstances is different than the requirements for calculating Pell Grants.

All clock-hour programs, non-term credit-hour programs, and nonstandard-term programs with terms that are not SE9W (a program with terms substantially equal in length, with each term comprised of 9 or more weeks of instructional time) must use a Borrower-Based Academic Year (BBAY) that meets the minimum requirements for an academic year. That is, the BBAY must contain at least 30 (or, for clock-hour programs, 26) weeks of instructional time and at least the minimum number of credit or clock-hours: for undergraduate programs, 24 semester or trimester hours, 36 quarter-hours, or 900 clock-hours; for graduate programs, the number of hours a student would complete under the school's full-time standard in the weeks of the Title IV academic year, which must be a minimum of 30 weeks of instructional time, or, for clock-hour programs, at least 26 weeks of instructional time. This requirement also applies to a program that consists of both standard and nonstandard terms and that does not qualify to use a Standard Academic Year (SAY).

The BBAY begins when a student enrolls and does not end until the later of the date the student successfully completes the hours in the academic year or the number of weeks of instructional time in the academic year.

Because a student must successfully complete the minimum number of hours or weeks of instructional time in an academic year (whichever comes later) before a new BBAY begins, a student's enrollment status may affect how soon the student regains eligibility for a new annual loan limit. For example, a student who is attending part-time will take longer to complete a BBAY than a full-time student. (In contrast, an SAY or BBAY for a standard term program, or a non-standard SE9W program ends when the *calendar period* associated with the terms in the SAY or BBAY has elapsed, regardless of how many credit-hours or weeks of instruction the student completed during the SAY or BBAY.)

For a non-term program, a student may not receive a subsequent loan disbursement until he or she completes the minimum number of instructional weeks and credit hours in the program's academic year.

See 34 C.F.R. §§685.102(b) and 685.301(a)(10)

Noncompliance:

- Incorrect Determination of Direct Loan Periods
- Incorrect Determination of Pell Payment Periods

SJC reported that it offers educational programs in a 100% online modality. The online degrees are offered at the undergraduate and graduate levels and are measured in credit hours. Prior to July 1, 2016, most online undergraduate and graduate programs were comprised of courses that were 15 weeks in length and students earned 3 semester credit hours for each successful completion of each course.

The Nursing (graduate and undergraduate) and Masters of Business Administration (MBA) were structured as follows:

Nursing -program courses were 12 weeks in length and students earned 3 or 4 credits depending on the course.

MBA – program courses were 10 weeks in length and students earned 3 semester credits.

In addition, some online programs involve a capstone course. At the undergraduate level, these programs are Nursing, Radiology, Theology, and Masters in Education (MSEd) programs have capstone courses. Capstone courses entail research and special projects. Prior to July 1, 2016, these courses were structured to treat a student as enrolled in a capstone course for a period that extended across multiple 15-week terms. Programs in Nursing, Radiology, and Theology

included capstone and practicum courses that could span as long as 67 weeks and awarded 3 semester credit hours upon successful completion of the course.

According to SJC, it wasn't until the departure of the former Financial Aid Director, after July 1, 2016, they discovered that SJC had no restrictions in place that would prevent students from enrolling in multiple courses with various start and end dates, and in some cases, students enrolling in courses that overlapped terms (i.e. students began new courses before the previous courses ended). In addition, the capstone programs, which required students to complete research and other courses, did not begin and end within a term, but rather extended across multiple terms.

Upon discovering that there were no restrictions preventing students from enrolling in multiple and overlapping courses, SJC hired Huron Consulting Group (Huron) to conduct a review of the school's administration of Title IV programs for the 2012-2013, 2013-2014, 2014-2015, and 2015-2016 award years. The purpose of Huron's review was to determine (1) whether SJC had awarded and disbursed federal student aid to online students in accordance with the Department's regulations and (2) to what extent SJC did not award and disburse federal student aid in accordance to the Department's regulation.

Huron's review determined that the structure of SJC's online programs met the definition of a program with non-term academic calendar due to the fact that some courses overlapped terms and some courses (e.g. capstone courses) did not begin and end within a set period. Therefore, Huron believes Title IV should have been awarded in accordance with Title IV requirements for non-term programs (i.e. using Pell formula 4 and Borrower-Based Academic Year ("BBAY3")). However, during the period under review, SJC administered Title IV aid based on a standard term academic calendar (i.e. students were awarded as if they were enrolled in standard semester terms). SJC admitted to developing procedures that awarded aid based on an online student's course enrollment, awarding Federal Pell Grants (Pell) reflective of a student's course enrollment, calculated using Pell Formula 1. SJC awarded Federal Direct Loans (DL) using BBAY 1 to determine when a student was eligible for a new annual loan limit. An institution may alternate between BBAY1 and SAY only, provided academic years do not overlap.

Huron's assessment found the following:

- SJC defined their academic year as follows
 - Traditional program - 24 credits/30 weeks (Fall/Spring)
 - On-line:
 - 12-week undergraduate program - 36 credits/36 weeks (3 terms)
 - 12-week graduate program - 18 credits/36 weeks (3 terms)
 - 10-week graduate program - 24 credits/40 weeks (4 terms)

- SJC's practice was to award and disburse Title IV aid to students on a term-by-term basis. After a student registered for courses, the Financial Aid Office (FAO) awarded financial aid to meet the tuition, fee, and book expenses for those courses for that term.
- SJC would increase the financial aid award to meet the living expense component of the cost of attendance, if the student requested such an increase. A student's eligibility for financial aid was based on the number of credits that the student would earn for the courses in which the student was enrolled for that term. A student payment period began with the first day of enrollment. For example, if a student began enrollment on 8/1/2015 and ended on 11/14/2015, the payment period for DL was 8/1/2015-11/14/2015.
- For DL awards, when a student enrolled in a second set of courses, a new loan was originated with the loan period matching the beginning and ending date of the second set of courses. Therefore, the loan period would be different on each loan certified on a student's behalf. In this scenario, students were provided two loans that equaled a term's worth of aid, but with two different loan periods. The academic level of loan progression was established following the completion of two terms of enrollment.
- For Pell awards, SJC similarly treated each set of courses as a payment period. Thus, if a student were to enroll in 12 credits (full time) beginning 8/1/2015 and ending on 11/14/2015, SJC treated the student as ineligible for Pell again until after the 15-week period had expired (after 11/14/2015). If a student were to enroll in 6 credits (half-time) on 8/1/2015 and then another 6 credits on 10/1/2015, the student would receive Pell for ½ time status according to the Pell Formula 1, for the 8/1/2015 courses and Pell for ½ time status, according to Pell Formula 1, for the 10/1/2015 courses. Such student would receive the same total amount of the Pell grant as the student who took 12 credits beginning on 8/1/2015.

During the Department's review of SJC's administration of Title IV programs, the reviewers discovered findings equivalent to that of Huron's. The Department found that SJC did not ensure that their graduate online students completed at least half-time credit hours and 15 weeks of instruction before making subsequent loan disbursements. Additionally, SJC did not confirm that a student completed both the necessary credit hours in an academic year and weeks of instruction before originating a new BBAY 3 loan. As a result, some online graduate students received subsequent disbursements within a payment period, and a new loan period was initiated prior to students completing the required credit hours and weeks of instructional time. The following online graduate students were included in this finding:

Student 3: Student 3 was enrolled in the online MBA program for the 2015-2016 academic year for the following terms:

Terms	Loan Disbursement Date	Credit Hours	Weeks	Days	Loan Amounts Certified and Disbursed
7/29/2015 through 10/6/2015	9/15/2015	3	9	6	\$4,091
10/7/2015 through 12/15/2015	11/9/2015	3	9	6	\$4,091
1/18/2016 through 4/11/2016	2/16/2016	3	13	3	\$4,090
4/18/2016 through 7/11/2016	Pending as of 11/20/2018	3	12	0	\$4,939

The student was enrolled in 3 hours each “term”, which, according to the student’s award letter, is considered half-time for graduate students. Although the student completed the required hours, SJC did not require the student to complete 12 weeks prior to making a subsequent disbursement for the first two terms listed above; therefore not meeting the definition of a standard term.

As a result of the Huron’s review, SJC accepted and self-reported the following findings to the Department:

- During the review period, SJC did not award Pell using Pell Formula 4 and did not use BBAY3 for certification of Federal Direct Loans for students enrolled in SJC’s online programs, which were structured as non-term programs. As a result, some students were awarded Title IV in which they were ineligible.
- With regard to Pell, SJC did not use Pell Formula 4 and therefore did not consider the students’ actual enrollment when prorating the students’ scheduled award. As a result, SJC under-awarded Pell to students who were enrolled in less than 12 hours (full time) but more than the minimum for each enrollment level (6 credit hours for half-time and 9 credit hours for three-quarter time). Pell awards were calculated incorrectly and resulted in students being under-awarded.
- With regard to Direct Loans, SJC did not confirm that undergraduate online students had successfully completed at least 12 credit hours and 15 instructional weeks before making subsequent disbursements. In addition, SJC did not confirm that graduate online students completed at least 6 credit hours and 15 weeks of instruction before making subsequent disbursements. SJC did not confirm that weeks of instruction were completed before originating a new BBAY3 loan. As a result, some online students received subsequent disbursements within the same payment period and a new loan was certified prior to students completing the required credit hours and weeks of instructional time
- **Graduate Student File Review:** A random sample was selected of 80 graduate students, including 40 students who had courses that overlapped and 40 students who did not have courses that overlapped. As a result, 2 graduate students were disbursed Direct Loans for

which they were ineligible. The total liability loan amount was \$20,902. In addition, 2 separate graduate students were disbursed Direct Loan payments earlier than the correct scheduled time. This resulted in a liability of \$1,469.

- **Undergraduate Student File Review:** A random sample was selected of online undergraduate students who received Pell Grant funds during the Review period in which Huron tested, plus a random sample of (5 students total) who had overlapping and non-overlapping courses and did not receive Pell Grants. The following results were determined:
 - 9 undergraduate students were determined to be ineligible for all Federal Pell Grant funds disbursed to them. The total ineligible Pell Grant amount was \$14,228.
 - 15 undergraduate students received Pell Grants at an amount that was less than what would have been calculated according to Pell Formula 4. The total amount of underfunding for undergraduate Pell students in the review population was \$7,475.
 - 10 undergraduate students received Pell Grants at an amount that was more than would have been calculated according to Pell Formula 4. The total amount over awarded for undergraduate Pell students in the review population was \$8,207.
 - 7 undergraduate students were disbursed Direct Loans for which they were determined to be ineligible. The total ineligible loan amount totaled \$38,143.

48 undergraduate students received early disbursements (43 students received subsidized and 17 unsubsidized). The total amount of loan funds that were disbursed early was \$168,278.

Required Action: SJC self-reported that they awarded and disbursed Title IV aid to students using standard terms instead of non-standard terms to students enrolled in their online undergraduate and graduate programs. All Title IV aid disbursed to online undergraduate and graduate students for 2015-2016 and 2016-2017 award years used incorrect awarding criteria, and those incorrect calculations resulted in under-awards and over-awards for many of the students.

Therefore, SJC is required to review the files for all online undergraduate and graduate Title IV recipients for 2015-2016 and 2016-2017 award years, including the recipients included in this report and the Huron report, in order to verify if the disbursements made to these students were accurate. SJC must compile the results of its file review in an Excel spreadsheet, as detailed below. The Excel spreadsheet must be provided in the format identified in attachment B1, in both hardcopy and electronic format. If SJC does not include each of the data elements requested, the response will not be considered complete.

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1. Student Name
2. Social Security Number
3. Cost of Attendance
4. Expected Family Contribution
5. Remaining Need
6. Total Need Based on Aid Received , by program
7. Non-Need Based Aid Received, by program
8. Is Amount of Column 6, greater than Column 5 (Yes or No)?
9. If yes, amount of over-award in excess of need

10. Amount Due to the Department, by Program

SJC must include copies of source documents containing loan origination and disbursement information, Pell disbursement information, student account ledgers, and student academic transcripts (determination of grade level and subsequent payment period).

In addition, SJC must provide a comprehensive set of policies and procedures that indicate how it will administer the online, non-term programs. The policies should outline how SJC defines its academic year and detail the credit hours of instruction that comprise each payment period for all versions of its programs. Additionally, SJC must indicate the process it will use to identify when a student is eligible for all disbursements.

SJC will be apprised of any additional requirements upon review of the response to this finding. Instructions for repayment of liabilities, including interest, will be provided in the Final Program Review Determination letter.

Finding 2. Inaccurate and Untimely Enrollment Reporting to National Student Loan Database System (NSLDS):

Citation: 34 C.F.R. § 685.309(b)(1) and (b)(2): A school shall, unless it expects to submit its next enrollment report to the Secretary within the next 60 days, notify the Secretary within 30 days if it discovers a Direct Subsidized, Direct Unsubsidized or Direct PLUS loan has been made to or on behalf of student who enrolled at that school but has ceased to be enrolled on at least a half-time basis

Noncompliance: SJC failed to report the following student's enrollment status in a timely manner, or accurately report a change in status.

Student 5 – Student's transcript shows that the student was registered at the undergraduate level for 6 credit hours Fall 2015 and Summer 2016. SJC reported full-time status to NSLDS.

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Student 8 – Student's transcript shows that the actual end date of the payment period was 3/2/2016. SJC reported that the student had withdrawn as of 12/15/2015. There is no indication in the student's file that the student withdrew from the term.

Student 9 – According to the student's transcript, the student was enrolled in 9 credit hours (graduate) during Summer 2017; however, SJC reported to NSLDS that the student was half-time. According to SJC, graduate students enrolled in 9 hours are considered full time.

Student 11 – SJC reported that the student was half-time or the payment period of 1/4/2017-4/19/2017. The student was a graduate student enrolled in 6 hours which is considered full time.

Student 12 – SJC did not report the student's enrollment for payment period 7/27/2016 – 10/4/2016.

Student 13 – Student's transcript indicates that the student graduated on 2/28/2017; however, NSLDS shows that the student's graduation date is 1/9/2017. It appears that SJC also reported to NSLDS that the student withdrew as of 1/30/2017.

Student 14 – Student's transcript indicates that the student graduated on 9/1/2017; however, NSLDS shows that the student's graduation date is 8/14/2017.

Required Action: SJC is required to update any inaccurate enrollment status for all students identified in this finding. SJC must provide the Department with the documentation indicating that the required updates were made.

SJC is also required to have procedures in place to ensure NSLDS reflects accurate data and the student changes of status are reported in a timely manner. SJC is required to review the NSLDS Enrollment Reporting Guide and make appropriate changes to its policies and procedures to ensure the student status is updated and reported in a timely manner. A copy of the policy and procedures must be provided with the response to this report.

Finding 3. Missing Exit Counseling for Direct Loans:

Citation: 34 CFR § 685.304 (a) & (b): A school must ensure exit counseling is conducted with each Direct Subsidized Loan or Direct Unsubsidized Loan borrower shortly before the student borrower ceases at least half-time study at the school. If the student borrower drops out without notifying your school, an institution must confirm the student has completed online counseling or has mailed exit counseling materials to the borrower the student's last known address. It is also acceptable to email the information to the borrower at the student's home (not school) e-mail address, if the address is available. The material must be mailed or emailed within 30 days of learning a borrower has withdrawn or failed to participate in an exit counseling session.

Noncompliance: SJC did not provide proof that exit counseling was conducted for the following students:

- Student 7 – Student received an unsubsidized loan while attending SJC. The student completed Fall 2015 term but did not return to SJC until Spring 2017. SJC did not provide proof that the student received exit counseling after Fall 2015.
- Student 13 – Student graduated on 2/28/2017. SJC did not provide proof of exit counseling.
- Student 19 – Student's last term was Summer 2018. SJC did not provide proof of exit counseling.

Required Action: In response to this finding, SJC must submit documentation that it mailed exit counseling materials to the students listed above. SJC must also develop policies and procedures to ensure all Title IV borrowers receive exit counseling and submit a copy of the policies and procedures to the Department for review.

Finding 4: Inaccurate Common Origination and Disbursement (COD) Reporting

Citation: 34 CFR § 668.164(a). A disbursement of Title IV, HEA program funds occurs on the date the institution credits the student's ledger account or pays the student or parent directly with funds received from the Secretary, or institutional funds used in advance of receiving Title IV, HEA program funds.

Noncompliance: SJC reported inaccurate disbursement dates to COD for students listed below during the 2015-2016 and 2016-2017 award years. This issue becomes especially critical for loan recipients, as the disbursement date reported to COD is vital in the lender's determination of an accurate repayment start date.

Student Number	Award Year	Disbursement Date(s) on Student Account Ledger	Disbursement Date(s) Reported to COD	Program	Award Amount
1	2015-2016	7/11/2015	7/5/2016	Unsubsidized Loan	\$4,984.00
12	2016-2017	11/15/2016	11/10/2016	Unsubsidized Loan	\$5,071.00

Required Action: SJC must ensure that disbursement dates on the student's ledgers match the disbursement dates reported to COD. SJC must correct all discrepancies. In addition, SJC must develop policies and procedures to ensure disbursement dates are reported timely to COD. A copy of the policies and procedures must be provided with the response to this report.

Finding 5: Inaccurate Record Keeping Regarding Title IV Credit Balance

Citation: 34 CFR 668.34. A school must keep fiscal records to demonstrate its proper use of FSA funds. A school's fiscal records must provide a clear audit trail that shows that funds were received, managed, disbursed, and returned in accordance with federal requirements.

The fiscal records a school must maintain include but are not limited to:

- Records of all FSA program transactions,
- Records of student accounts, including each student's institutional charges, cash payments, FSA payments, cash disbursements, refunds, returns, and overpayments required for each enrollment period.

Noncompliance: According to the information on the students' account ledgers, a credit balance was disbursed on a different date than the date of the disbursement checks:

Student 5 – Student ledger shows that SJC disbursed a subsidized loan in the amount of \$972.00 and an unsubsidized loan in the amount of \$1,205.00 on 9/14/2015. Once the loans were applied to the student's balance, the transcript shows a credit balance of \$249. SJC described the refund on the transcript as "Refund by Check" with a date of 9/18/2015; however, the date on the check mailed to the student shows that the credit balance was disbursed on 9/22/2015.

Student 7 - Student ledger shows that SJC disbursed a subsidized and unsubsidized loans. The student's credit balance appears as "Refund by Check" on the transcript in the amount of \$3,122.00 on 12/3/2015; however, the date on the check mailed to the student shows that the credit balance was disbursed on 12/14/2015.

Required Action: SJC must develop policies and procedures to ensure that fiscal records demonstrate a clear and accurate audit trail in regard to the disbursement of student credit balances. The entry on the ledger should accurately describe the transaction that occurred on that date, whether it is recording the date the refund was vouchered/initiated, or the date the funds were disbursed/made available to the student. A copy of the policies and procedures must be provided with the response to this report.



New England Commission of Higher Education
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<http://neche.org>

FINANCE AND ENROLLMENT (F&E) FORMS

Revised October 2018; Effective December 1, 2018

General instructions:

This Excel workbook contains data forms to supplement reports on finance and enrollment. Each of the 16 forms is on a separate spreadsheet of this Excel workbook. Much of the information requested is readily available on audited financial statements, yearly IPEDS surveys, and other institutional reports and publications.

When entering financial data, please report in U.S. dollars and round to the nearest thousand. If your institution tabulates data in a different way from what is requested on the form, clearly explain your methodology on the form and report the data in the way that is consistent with your institution's normal practices.

In the following forms, the column "**Current Year**" refers to the year in which the report is submitted to the Commission. On the Revenues and Expenses form, please make sure the information is consistently presented from year to year, including the "Current Year" and the "Next Year Forward" columns. For example, if depreciation is allocated in the "Most Recently Completed Year" column, it should also be allocated in the "Current Year" column.

Cells shaded **green** indicate where data should be entered. Cells with a dash ("-") or a zero (\$0) indicate where figures will be calculated automatically based on data entered in other cells.

F&E forms are protected to ensure that they are not inadvertently changed, and cells containing certain formulas are locked. However, you are encouraged to **add rows to insert additional information as needed or adjust column widths**. To do so, unprotect the spreadsheet by selecting the "Unprotect Sheet" option from the "Review" menu. **The required password is "ark"** (lower case, no quotation marks).

Instructions and definitions are embedded in each form. To see the instructions, move the mouse on top of red boxes with a **?**. This version of the F&E forms has been formatted to print the forms only. If you wish to print the forms with their accompanying instructions, you can find a specially formatted version of F&E forms on the Commission website: <http://neche.org>.

If you have questions about completing the F&E Forms, please call a member of the Commission staff for assistance.

FINANCE & ENROLLMENT (F&E) FORMS

GENERAL INFORMATION

Institution Name: Saint Joseph's College

OPE ID: ? #: 00205100

		Annual Audit	
		Certified:	Qualified
		Yes/No	Unqualified
Financial Results for Year Ending:	ph 06/30	Pending	Pending
Most Recent Year	? 2020	Yes	Unqualified
1 Year Prior	2019	Yes	Unqualified
2 Years Prior	2018	Yes	Unqualified

Fiscal Year Ends on: 06/30 (month/day)

Budget / Plans

Current Year	2021
Next Year	2022

Contact Person: ? Michael Pardales

Title: VP & Chief Learning Officer

Telephone No: 207-893-6641

E-mail address: mpardales@sjcme.edu

Standard 7: Institutional Resources
(Headcount of Employees by Occupational Category)

For each of the occupational categories below, enter the data reported on the IPEDS Human Resources Survey (Parts B and D1) for each of the years listed.

If your institution does not submit IPEDS, visit this link for information about how to complete this form:

https://surveys.nces.ed.gov/IPEDS/Downloads/Forms/package_1_43.pdf

	3 Years Prior			2 Years Prior			1 Year Prior			Current Year		
	(FY 18)			(FY 19)			(FY 20)			(FY 21)		
	FT	PT	Total	FT	PT	Total	FT	PT	Total	FT	PT	Total
Instructional Staff	28	6	34	25	6	31	19	4	23			0
Research Staff			0			0			0			0
Public Service Staff			0			0			0			0
Librarians	2		2	2		2	1		1			0
Library Technicians	2		2	1		1	1		1			0
staff		1	1		1	1		1	1			0
Student and Academic Affairs			0			0			0			0
Management Occupations	54		54	38		38	37		37			0
Operations	6		6	12	1	13	6		6			0
Computer, Engineering and Science	12		12	14		14	12		12			0
Community, Social Service, Legal, Arts, Design, Entertainment, Sports, and Media	17	19	36	22	19	41	31	21	52			0
Technical	4	5	9	4	4	8	4	4	8			0
Service Occupations	69	73	142	51	63	114	48	44	92			0
Sales and Related Occupations	1		1			0			0			0
Support	46	1	47	33	1	34	22	3	25			0
Construction, Maintenance	7	1	8	7		7	7		7			0
Material Moving			0			0			0			0
Total	248	106	354	209	95	304	188	77	265	0	0	0

Please enter any explanatory notes in the box below

IPEDS data as of 11/1 each year.

FY18 = 11/1/17

FY19 = 11/1/2018

FY20 = 11/1/2019

FY21 (current) will be

Standard 7: Institutional Resources
(Statement of Financial Position/Statement of Net Assets)

Fiscal Year ends - month & day: (6 / 30)	Years Prior (FY 2019)	Year Prior (FY 2018)	Recent Year FY	Percent Change 2 yrs-1 yr prior	1 yr-most recent
ASSETS (in 000s)					
Cash and Short-Term Investments	\$3,172	\$2,794	\$4,385	-11.9%	56.9%
Cash held by State Treasurer				-	
Deposits held by State Treasurer				-	
Accounts Receivable, Net	\$373	\$313	\$435	-16.1%	39.0%
Contributions Receivable, Net	\$262	\$141	\$118	-46.2%	-16.3%
Inventories and Prepaid Expenses	\$447	\$447	\$452	0.0%	1.1%
Long-Term Investments	\$11,550	\$14,134	\$14,863	22.4%	5.2%
Loans to Students	\$1,787	\$1,539	\$1,343	-12.8%	-13.9%
Funds held under bond agreement	\$1,353	\$1,376	\$1,076	1.7%	-21.8%
Property, plants, and equipment, net	\$46,285	\$44,668	\$43,059	-3.5%	-3.6%
Other Assets	\$1,335	\$1,261	\$1,409	1.9%	9.9%
Total Assets	\$66,564	\$66,793	\$67,200	0.3%	0.6%
LIABILITIES (in 000s)					
Accounts payable and accrued liabilities	\$2,464	\$2,816	\$1,836	14.3%	-34.8%
Deferred revenue & refundable advances	\$1,741	\$1,300	\$2,041	-25.3%	57.0%
Due to state				-	
Due to affiliates				-	
Annuity and life income obligations	\$4	\$4	\$4	0.0%	0.0%
Amounts held on behalf of others	\$51	\$38	\$38	-25.5%	0.0%
Long-term investments	\$21,015	\$19,135	\$19,998	-8.9%	4.5%
Refundable government advances	\$1,251	\$1,432	\$1,098	14.5%	-23.3%
Other long-term liabilities	\$1,500	\$400	\$0	-73.3%	100.0%
Total Liabilities	\$28,026	\$25,125	\$25,015	-10.4%	-0.4%
NET ASSETS (in 000s)					
Unrestricted net assets					
Institutional	\$26,679	\$27,432	\$27,521	2.8%	0.3%
Foundation				-	
Total	\$26,679	\$27,432	\$27,521	2.8%	0.3%
Temporarily restricted net assets					
Institutional	\$6,607	\$8,649	\$8,925	30.9%	3.2%
Foundation				-	
Total	\$6,607	\$8,649	\$8,925	30.9%	3.2%
Permanently restricted net assets					
Institutional	\$5,252	\$5,587	\$5,739	6.4%	2.7%
Foundation				-	
Total	\$5,252	\$5,587	\$5,739	6.4%	2.7%
Total Net Assets	\$38,538	\$41,668	\$42,185	8.1%	1.2%
TOTAL LIABILITIES and NET ASSETS	\$66,564	\$66,793	\$67,200	0.3%	0.6%

Please enter any explanatory notes in the box below

**Standard 7: Institutional Resources
(Statement of Revenues and Expenses)**

Fiscal Year ends - month& day: (6 / 30)		Years Prior (FY2018)	2 Years Prior (FY2019)	Partly Completed Year	Current Year (FY 2021)	Year Forward (FY 2022)
OPERATING REVENUES (in 000s)						
?	Tuition and fees	\$41,452	\$42,461	\$39,936	\$35,493	\$36,906
?	Room and board	\$8,887	\$9,263	\$7,711	\$9,418	\$9,800
?	Less: Financial aid	-\$17,556	-\$18,434	-\$17,004	-\$13,785	-\$14,731
	Net student fees	\$32,783	\$33,290	\$30,643	\$31,126	\$31,975
?	Government grants and contracts	\$77	\$183	\$608	\$3,250	\$183
?	Private gifts, grants and contracts	\$1,338	\$928	\$679	\$625	\$745
?	Other auxiliary enterprises	\$1,397	\$1,556	\$699	\$900	\$1,516
	Endowment income used in operations	\$605	\$631	\$460	\$485	\$634
?	Other revenue (specify):	\$109	\$16	\$17	\$17	\$17
	Other revenue (specify):	\$743	\$861	\$865	\$428	\$585
	Net assets released from restrictions					
	Total Operating Revenues	\$37,052	\$37,465	\$33,971	\$36,831	\$35,655
OPERATING EXPENSES (in 000s)						
?	Instruction	\$12,493	\$11,964	\$11,613	\$11,147	\$11,354
?	Research					
?	Public Service					
?	Academic Support	\$1,880	\$1,704	\$1,622	\$1,609	\$1,639
?	Student Services	\$8,442	\$8,982	\$8,229	\$7,928	\$8,075
?	Institutional Support	\$7,728	\$7,620	\$7,321	\$7,006	\$7,135
	Fundraising and alumni relations					
?	Operation, maintenance of plant (if not allocated)					
?	Scholarships and fellowships (cash refunded by public institution)					
?	Auxiliary enterprises	\$6,337	\$6,471	\$5,614	\$5,693	\$5,799
?	Depreciation (if not allocated)					
?	Other expenses (specify):					
	Other expenses (specify):					
	Total operating expenditures	\$36,880	\$36,741	\$34,399	\$33,383	\$34,002
	Change in net assets from operations	\$172	\$724	-\$428	\$3,448	\$1,653
NON OPERATING REVENUES (in 000s)						
?	State appropriations (net)					
?	Investment return	\$255	\$337	\$330		
?	Interest expense (public institutions)					
	Gifts, bequests and contributions not used in operations	\$112	\$2,047	\$687		
?	Other (specify):	-\$24	\$2	\$1		
	Other (specify):			\$73		
	Other (specify):	-\$20	\$20	-\$146		
	Net non-operating revenues	\$323	\$2,406	\$945	\$0	\$0
	Income before other revenues, expenses, gains, or losses	\$495	\$3,130	\$517	\$3,448	\$1,653
?	Capital appropriations (public institutions)					
?	Other (specify):					
	TOTAL INCREASE/DECREASE IN NET ASSETS	\$495	\$3,130	\$517	\$3,448	\$1,653

**Standard 7: Institutional Resources
(Statement of Debt)**

FISCAL YEAR ENDS month & day (6 /30)		3 Years Prior (FY2018)	2 Years Prior (FY2019)	Recently Completed Year	Current Year (FY 2020)
	Long-term Debt				
	Beginning balance	\$19,501,257	\$21,014,527	\$19,134,722	\$19,998,396
	Additions	\$2,600,602	\$19,045	\$3,137,025	\$2,100,000
	Reductions	(\$1,087,332)	(\$1,898,850)	(\$2,273,351)	(\$6,681,165)
	Ending balance	\$21,014,527	\$19,134,722	\$19,998,396	\$15,417,231
	Interest paid during fiscal year	\$1,050,456	\$943,195	\$937,100	\$735,092
	Current Portion	\$1,792,556	\$1,879,735	\$4,853,279	\$1,238,311
	Bond Rating				
	Debt Service Coverage Operating Income / (Annual Interest + Current Portion of Debt)	1.22	1.51	1.23	
	Debt to Net Assets Ratio Long-term Debt / Total Net Assets	0.55	0.46	0.47	
	Debt to Assets Ratio Long-term Debt / Total Assets	0.32	0.29	0.30	

Debt Covenants: (1) Describe interest rate, schedule, and structure of payments; and (2) indicate whether the debt covenants are

The College has bonds outstanding through the Maine Health and Higher Educational Facilities Authority (MHHEFA). As security for the

Line(s) of Credit: List the institutions line(s) of credit and their uses.

The College has a \$1,500,000 continuing unsecured demand line of credit with a financial institution. The outstanding balances on the line of

Future borrowing plans (please describe).

The College plans to refinance the Athletic Field Complex debt during fiscal year 2021, with a MHHEFA bond issue.

Year Forward (FY 2022)

\$15,417,231
\$0
(\$1,238,311)
\$14,178,920
\$657,377

being met. If
bonds, the Collec

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of credit was \$0

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**Standard 7: Institutional Resources
(Supplemental Data)**

FISCAL YEAR ENDS month & day (6/30)		Years Prior (FY2018)	Years Prior (FY2019)	Justly Completed Year	Current Year (FY 2020)	Year Forward (FY 2021)
NET ASSETS						
	Net assets beginning of year	\$38,043,185	\$38,538,202	\$41,667,840		\$0
	Total increase/decrease in net assets	\$495,017	\$3,129,638	\$516,986		
	Net assets end of year	\$38,538,202	\$41,667,840	\$42,184,826	\$0	\$0
FINANCIAL AID						
	Source of funds					
	Unrestricted institutional	\$17,085,688	\$17,926,860	\$16,597,328		
	Federal, state and private grants	\$1,905,921	\$2,005,312	\$1,833,296		
	Restricted funds	\$470,648	\$506,983	\$407,028		
	Total	\$19,462,257	\$20,439,155	\$18,837,652	\$0	\$0
	% Discount of tuition and fees	52.9%	53.3%	51.8%		
?	% Unrestricted discount	51.5%	51.9%	50.5%		
	Net Tuition Revenue per FTE	\$16,332	\$16,935	\$17,125		
?	FEDERAL FINANCIAL RESPONSIBILITY COMPOSITE SCORE	2.3	2.7	2.6		
Please indicate your institution's endowment spending policy: The spending policy calculates the amount of money annually distributed from the College's endowment and quasi endowment. The current						
Please enter any explanatory notes in the box below.						

Standard 7: Institutional Resources
(Liquidity)

FISCAL YEAR ENDS month & day (6/30)	Years Prior (FY2018)	Years Prior (FY2019)	Most Recently Completed Year	Current Year (FY 2020)	Next Year Forward (FY 2021)
CASH FLOW					
Cash and Cash Equivalents beginning of year	\$1,033,975	\$2,048,392	\$1,670,560	\$3,260,648	
Cash Flow from Operating Activities	\$2,947,710	\$3,013,730	\$2,125,288		
Cash Flow from Investing Activities	(\$467,082)	(\$2,702,890)	(\$1,197,280)		
Cash Flow from Financing Activities	(\$1,466,211)	(\$688,672)	\$662,080		
Cash and Cash Equivalents end of year	\$2,048,392	\$1,670,560	\$3,260,648	\$3,260,648	\$0
LIQUIDITY RATIOS					
Current Assets	\$8,191,230	\$7,075,350	\$8,654,860		
Current Liabilities	\$7,553,170	\$6,544,416	\$6,987,296		
Current Ratio	1.08	1.08	1.24	0.00	0.00
Days Cash on Hand ((Cash and Cash Equivalents / [Operating Expenses + Depreciation and other noncash expenses]) / 365)	21.78	17.94	37.43		
Please enter any explanatory notes in the box below that may impact the institution's cash flow					
Has the institution needed to access its restricted net assets or liquidate other financial assets to fund operations? If so, please describe and indicate when approvals (if required) were obtained from the state's authority.					
The College borrows and returns from it's reserves/quasi endowed funds to support operations during light cash periods between					
Please enter any explanatory notes in the box below.					
Cash and cash equivalents includes both Unrestricted and Restricted Cash. Restricted cash amounts are as follows. FY18 \$549,552, FY19 \$960					

Standard 5: Students

(Admissions, Fall Term)

Complete this form for each distinct student body identified by the institution (see Standard 5.1)

?

Credit Seeking Students Only - Including Continuing Education

	3 Years Prior (FY 2018)	2 Years Prior (FY 2019)	1 Year Prior (FY 2020)	Current Year (FY 2021)	Goal (specify year) (FY 2022)
Freshmen - Undergraduate	?				
Completed Applications	1,355	1,433	1,301	1,379	
Applications Accepted	1,089	1,225	1,137	1,172	
Applicants Enrolled	267	284	212	303	
% Accepted of Applied	80.4%	85.5%	87.4%	85.0%	-
% Enrolled of Accepted	24.5%	23.2%	18.6%	25.9%	-
Percent Change Year over Year					
Completed Applications	na	5.8%	-9.2%	6.0%	-100.0%
Applications Accepted	na	12.5%	-7.2%	3.1%	-100.0%
Applicants Enrolled	na	6.4%	-25.4%	42.9%	-100.0%
Average of statistical indicator of aptitude of enrollees: (define below)	?				
Transfers - Undergraduate	?				
Completed Applications	1,057	213	208	160	
Applications Accepted	359	197	191	150	
Applications Enrolled	188	113	123	83	
% Accepted of Applied	34.0%	92.5%	91.8%	93.8%	-
% Enrolled of Accepted	52.4%	57.4%	64.4%	55.3%	-
Master's Degree	?				
Completed Applications	858	222	237	238	
Applications Accepted	432	209	228	218	
Applications Enrolled	242	149	167	142	
% Accepted of Applied	50.3%	94.1%	96.2%	91.6%	-
% Enrolled of Accepted	56.0%	71.3%	73.2%	65.1%	-
First Professional Degree	?				
Completed Applications					
Applications Accepted					
Applications Enrolled					
% Accepted of Applied	-	-	-	-	-
% Enrolled of Accepted	-	-	-	-	-
Doctoral Degree	?				
Completed Applications					
Applications Accepted					
Applications Enrolled					
% Accepted of Applied	-	-	-	-	-
% Enrolled of Accepted	-	-	-	-	-

Please enter any explanatory notes in the box below

Standard 4: The Academic Program
(Summary - Degree-Seeking Enrollment and Degrees)

Fall Enrollment* by location and modality, as of Census Date

Degree Level/ Location &	Associate's	Bachelor's	Master's	Clinical	Professional	M.D., J.D.,	Ph.D.	Total Degree
Main Campus FT		853						853
Main Campus PT		4						4
Other Principal Campus FT								0
Other Principal Campus PT								0
Branch campuses FT								0
Branch campuses PT								0
Other Locations FT								0
Other Locations PT								0
Overseas Locations FT								0
Overseas Locations PT								0
Distance education FT	0	2	98					100
Distance education PT	7	311	500					818
Correspondence FT								0
Correspondence PT								0
Low-Residency FT								0
Low-Residency PT								0
Unduplicated Headcount Total	7	1,170	598	0	0	0	0	1,775
Total FTE	2.33	960.00	348.00					1,310.33
Enter FTE definition:	FT + (PT/3)	FT + (PT/3)	FT=(PT/2)					
Degrees Awarded, Most Recent	0	278	203					481

Notes:

- 1) Enrollment numbers should include all students in the named categories, including students in continuing education and students enrolled through any contractual relationship.
- 2) Each student should be recorded in only one category, e.g., students enrolled in low-residency programs housed on the main campus should be recorded only in the category "low-residency programs."
- 3) Please refer to form 3.2, "Locations and Modalities," for definitions of locations and instructional modalities.

* For programs not taught in the fall, report an analogous term's enrollment as of its Census Date.

Please enter any explanatory notes in the box below

Standard 4: The Academic Program
(Summary - Non-degree seeking Enrollment and Awards)

Fall Enrollment* by location and modality, as of Census Date

Degree Level/ Location & Modality	Title IV-Eligible Certificates: Students Seeking Certificates	Non-Matriculated Students	Visiting Students	Total Non-degree-Seeking	Total degree-seeking (from previous page)	Grand total
Main Campus FT				0		0
Main Campus PT			50	50		50
Other Principal Campus FT				0		0
Other Principal Campus PT				0		0
Branch campuses FT				0		0
Branch campuses PT				0		0
Other Locations FT				0		0
Other Locations PT				0		0
Overseas Locations FT				0		0
Overseas Locations PT				0		0
Distance education FT				0		0
Distance education PT		65		65		65
Correspondence FT				0		0
Correspondence PT				0		0
Low-Residency FT				0		0
Low-Residency PT				0		0
Unduplicated Headcount Total	0	65	50	115		115
Total FTE	0.00	21.66	16.66	38		38.32
Enter FTE definition:	$FT + (PT/3)$	$FT + (PT/3)$	$FT + (PT/3)$			
Certificates Awarded, Most	69					

Notes:

- 1) Enrollment numbers should include all students in the named categories, including students in continuing education and students enrolled through any contractual relationship.
- 2) Each student should be recorded in only one category, e.g., students enrolled in low-residency programs housed on the main campus should be recorded only in the category "low-residency programs."
- 3) Please refer to form 3.2, "Locations and Modalities," for definitions of locations and instructional modalities.

* For programs not taught in the fall, report an analogous term's enrollment as of its Census Date.

Please enter any explanatory notes in the box below

Standard 5: Students
(Financial Aid, Debt, Retention, and Graduation)

Complete this form for each distinct student body identified by the institution (see Standard 5.1)

- ? **Three-year Cohort Default Rate**
? **Three-year Loan repayment rate**
(from College Scorecard)

(FY 2014)	(FY 2015)	(FY 2016)
4.90%	4.60%	3.30%

? **Student Financial Aid**

Total Federal Aid
Grants
Loans
Work Study
Total State Aid
Total Institutional Aid
Grants
Loans
Total Private Aid
Grants
Loans

3 Years (FY 2018)	2 Years (FY 2019)	Most (FY 2020)	Reported in	
\$1,459,043	\$546,128	\$1,323,321		
\$5,819,193	\$5,720,005	\$5,542,148		
\$247,050	\$287,625	\$252,000		
\$17,481,794	\$18,747,579	\$17,715,565		
\$17,481,794	\$18,747,579	\$17,715,565		
\$0	\$0	\$0		
\$4,981,017	\$4,994,686		\$5,424,216	
\$542,236	\$416,519		\$502,232	
\$4,438,781	\$4,578,167		\$4,921,984	

Student Debt

Percent of students graduating with debt (include all students who graduated in this calculation)

Undergraduates
Graduates

91%%	92%%			

First professional students
For students with debt:

Average amount of debt for students leaving the institution with a degree

Undergraduates
Graduates

\$23,454	\$23,636			

First professional students

Average amount of debt for students leaving the institution without a degree

Undergraduates
Graduate Students

First professional students

Student Persistence and Graduation	3 Years Prior (FY 2018)	2 Years Prior (FY2019)	1 Year Prior (FY 2020)	Current Year (FY 2020)	Goal; specify year (FY 2)
------------------------------------	-------------------------------	------------------------------	------------------------------	---------------------------	----------------------------------

IPEDS Retention Data

Full-time Associate degree students
Part-time Associate degree students
Full-time Bachelor's degree students
Part-time Bachelors degree students

82%%	83%%			
53%	54%			

? **IPEDS Graduation Data (150% of time)**

Associate degree students
Bachelors degree students

59%%	54%%			

Please enter any explanatory notes in the box below

Standard 5: Students (Enrollment, Fall Term)

Complete this form for each distinct student body identified by the institution (see Standard 5.1)

?

Credit-Seeking Students Only - Including Continuing Education

	3 Years Prior (FY 2018)	2 Years Prior (FY 2019)	1 Year Prior (FY 2020)	Current Year (FY 2021)	Goal (specify year) (FY 2022)
UNDERGRADUATE					
First Year Full-Time Headcount	262	277	210	221	
Part-Time Headcount	1	2	0	0	
Total Headcount	263	279	210	221	0
Total FTE	262	278	209	221	
Second Year Full-Time Headcount	242	245	221	183	
Part-Time Headcount	0	1	0	0	
Total Headcount	242	246	221	183	0
Total FTE	242	245	217	183	
Third Year Full-Time Headcount	240	228	225	226	
Part-Time Headcount	1	0	0	0	
Total Headcount	241	228	225	226	0
Total FTE	240	228	225	226	
Fourth Year Full-Time Headcount	208	227	261	222	
Part-Time Headcount	31	10	5	4	
Total Headcount	239	237	266	226	0
Total FTE	218	230	263	227	
Unclassified Full-Time Headcount	3	2	0	1	
Part-Time Headcount	83	75	46	50	
Total Headcount	86	77	46	51	0
Total FTE	31	27	15	18	
Total Undergraduate Students					
Full-Time Headcount	955	979	917	853	0
Part-Time Headcount	116	88	51	54	0
Total Headcount	1,071	1,067	968	907	0
Total FTE	993	1,008	929	875	0
% Change FTE Undergraduate	na	1.5%	-7.8%	-5.8%	-100.0%
GRADUATE					
Full-Time Headcount	167	133	135	98	
Part-Time Headcount	591	542	535	500	
Total Headcount	758	675	670	598	0
Total FTE	463	404	403	348	
% Change FTE Graduate	na	-12.7%	-0.2%	-13.6%	-100.0%
GRAND TOTAL					
Grand Total Headcount	1,829	1,742	1,638	1,505	0
Grand Total FTE	1,456	1,412	1,332	1,223	0
% Change Grand Total FTE	na	-3.0%	-5.7%	-8.2%	-100.0%

Please enter any explanatory notes in the box below

Standard 4: The Academic Program
(Headcount by UNDERGRADUATE Major)



For Fall Term, as of Census Date

Certificate (add more rows as needed)

	Number of credits*	3 Years Prior (Fall 2017)	2 Years Prior (Fall 2018)	1 Year Prior (Fall 2019)	Current Year (Fall 2020)	Next Year Forward (goal) (Fall 2)
?	Cert. - Adult Education & Training	18.00	-	-	(13)	
	Cert. - Health Administration	18.00	-	2	4	3
	Info. Tech. - Certification Prep.	18.00	-	-	-	
	Cert. - Database Management	18.00		1		
	Cert. - Long Term Care Admin.	15.00	28	53	52	41
	Cert. - Catholic Theology	18.00	8	6	11	11
	Cert. - Catholic Catechesis	6.00	4	2	5	1
	Total		40	63	60	56
						0

Associate (add more rows as needed)

?	Assoc. - Interdisciplinary Studies	66	6	6	9	4
	Assoc. - Business Administration	66	-	-	-	
	Assoc. - Human Services	66	-	-	-	
	Assoc. - Psychology	66	2	1	1	
	Assoc. - Adult Education & Training	66	-	-	-	
	Assoc. - General Studies	66	-	-	-	
	Assoc. - Criminal Justice	66	-	-	-	
	Assoc. - Radiologic Science Admin.	66	1	5	5	3
?	Undeclared					
	Total		9	12	15	7
						0

Baccalaureate (add more rows as needed)

?	BUSINESS ADMINISTRATION	128	44	56	53	37
	ACCOUNTING	128	26	27	19	22
	FINANCE	128	23	24	14	14
	HUMAN RESOURCE MANAGEMENT	128	6	8	3	4
	INTERNATIONAL BUSINESS	128	17	11	3	3
	MANAGEMENT	128	28	23	23	19
	MARKETING	128	25	25	21	19
	BUSINESS AND SPORTS MGMNT	128	37	46	48	44
	COMMUNICATIONS	128	11	14	8	6
	Communications - Journalism	128	1	1	1	-
	Communications - Newmedia	128	4	1	-	-
	Communications -Journalism/PR	128	-	-	-	-
	Communications -Sports	128	2	3	3	6
	Communications - Business	128	2	3	5	5
	ENGLISH	128	18	9	8	2
	WRITING AND PUBLICATION	128	9	6	2	2
	FINE ART/ART & DESIGN	128	11	4	6	8
	ELEMENTARY EDUCATION	128	62	32	49	43
	SPECIAL EDUCATION	128	20	14	15	11
	EXERCISE SCIENCE - FITNESS LDR	128	14	9	5	4
	EXERCISE SCIENCE - EX. SPECIALIST	128	26	10	2	-
	EXERCISE SCIENCE - PRE-PHYS. THER.	128	28	32	33	32
	EXERCISE SCIENCE - SPORT PERFORM	128	8	9	11	13
	EXERCISE SCIENCE - PRE-ATH. TRAIN.	128	-	-	-	1
	PHYSICAL EDUCATION/TEACHER PREP	128	18	15	10	12
	SPORTS MANAGEMENT	128	16	14	11	10
	SPORTS MANAGEMENT- ATH. ADMIN.	128	2	1	2	-
	HEALTH & WELLNESS PROMOTIONS	128	17	19	15	9

HEALTH & WELLNESS PRE-OCCUPATION	128	-	-	14	19	
INFO SYSTEMS - General	128	-	-	-	-	
INFORMATION TECH. MGT.	128	2	2	-	-	
EARLY SCHOLARS PROGRAM	128	89	65	46	50	
NURSING	128	233	234	217	189	
HEALTH STUDIES	128	3	4	4	2	
(MED)BIOLOGY	128	35	50	40	29	
(Med) Biology - Pre-Dental	128	4	2	2	1	
(Med)Biology - Pre-Medicine	128	26	18	26	25	
Biology - Pre-Optometry	128	2	3	1	1	
(Med)Biology - Pre-Pharm	128	6	5	2	2	
Biology - Pre-Physician Assistant	128	23	12	11	12	
(Med)Biology - Pre-Vet. Med.	128	11	9	6	6	
CHEMISTRY	128	6	6	3	3	
BIOCHEMISTRY	128	-	6	6	11	
ENVIRONMENTAL STUDIES	128	3	6	4	2	
ENVIRONMENTAL SCIENCE	128	12	13	14	11	
MARINE SCIENCE	128	10	6	7	5	
MATHEMATICS	128	14	15	13	13	
CLASSICS	128	-	-	-	-	
CONTRACT MAJOR	128	1	-	-	-	
CRIMINAL JUSTICE	128	42	42	36	25	
HISTORY	128	24	28	20	21	
PHILOSOPHY	128	1	1	-	2	
POLITICAL SCIENCE	128	15	16	14	7	
PSYCHOLOGY	128	31	38	34	40	
SOCIOLOGY	128	4	2	2	-	
SOCIOLOGY - SOCIAL WORK	128	22	27	13	11	
THEOLOGY	128	6	4	1	1	
Interdisciplinary Studies	128	21	20	30	23	
BS in Business Admin.	128	3	8	14	14	
BS Bus. Admin. - Management	128	13	8	3	1	
BS Bus. Admin. - Banking	128	5	3	5	4	
BS Bus. Admin. - Accounting	128	8	3	6	1	
BS Bus. Admin. - Sales & Marketing	128	3	3	1	1	
BS General Studies - Bus. Admin.	128	2	1	-	-	
BS General Studies - Human Services	128	4	3	3	3	
BS General Studies - Psychology	128	3	-	-	-	
BS General Studies - Adult Educ. & Training	128	3	4	4	3	
BS General Studies - Criminal Justice	128	1	-	-	-	
BS General Studies - Accounting	128	-	-	-	-	
BS General Studies - Adult Educ. & Train. (Fast-track)	128	1	-	-	-	
BS Health Care Administration	128	-	-	-	-	
BS Health Administration	128	48	54	67	64	
BS Health Information Management	128	7	6	12	11	
BS Health Administration (Fast-track)	128	-	1	8	6	
BS Information Technology	128	5	1	-	-	
BS Long Term Care Admin. - Nursing Home	128	6	6	13	8	
BS Long Term Care Admin. - Assisted Living	128	1	2	3	4	
BS Long Term Care Admin. - Assisted Living	128	-	-	-	-	
Bachelor of Science in Nursing (BSN)	128	4	2	1	-	
BSN - Nursing	128	73	59	61	28	
BSN - Nursing	128	5	5	4	2	
BSN	128	-	-	-	-	
BSN - Nursing	128	9	2	1	-	

BLS - Christian Tradition	128	-	-	-	-	
BSRS - Health Administration	128	-	-	-	-	
BSRS - Business Administration	128	-	-	-	-	
BSRS - Adult Educ. & Training	128	-	-	-	-	
BS Rad Science Administration	128	75	80	89	52	
BS Rad Science Administration	128	2	3	2	2	
BSW Social Work	128	2	6	25	23	
BA - Theological Studies	128	58	58	60	54	
BA - Theological Studies (Cohort)	128	1	1	-	-	
BA - Theological Studies (Fast-track)	128	4	5	6	9	
Undeclared	128	27	26	23	29	
Total		1,494	1,400	1,347	1,156	0

Total Undergraduate	1,543	1,475	1,422	1,219	0
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* Enter here the number of credits students must complete in order to earn the credential (e.g., 69 credits in an A.S. in Nursing)

Please enter any explanatory notes in the box below

Standard 4: The Academic Program (Headcount by GRADUATE Major)

? For Fall Term, as of Census Date

Number of credits*	3 Years Prior (Fall 2017)	2 Years Prior (Fall 2018)	1 Year Prior (Fall 2019)	Current Year (Fall 2020)	Next Year Forward (goal) (Fall 2)
--------------------------	----------------------------------	----------------------------------	---------------------------------	---------------------------------	--

Master's (add more rows as needed)

?	Grad. Cert. - School Leadership	15	5	5	5	3
	Grad. Cert. - Catholic School Leadership	12	0	0	0	1
	Grad. Cert. -Health Admin.	18	1	0	0	0
	Grad. Cert. - Long Term Care Admin	15	0	2	0	9
	Grad. Cert. - Catholic HC Leadership	18	0	0	0	0
	CAGS - Interdisciplinary	18	12	10	12	10
	Grad. Cert. - Nursing & Health Care	15	0	0	0	0
	Grad. Cert. - Nursing Admin./Leadership	18	0	0	0	0
	FNP - Primary Care. Post-MSN CAG	30	9	5	9	3
	PG Cert. in Theology	18	0	1	0	1
	Grad. Cert. - Catholic Theology	18	9	11	22	13
	Cert. - Theology & Ministry - CAGS	6	1	0	0	0
	AGACNP -Post MSN CAG	30	0	0	3	3
	Cert. Ministry/Latino Catholic	21	0	0	1	0
	Cert. - Jewish/Christian Studies	18	0	0	1	1
	MBA	39	2	5		5
	MBA - Accounting	39	1	0	0	0
	MBA - Leadership	42	47	49	54	26
	Master of Accountancy	30	38	48	46	38
	MBA - Health Sector Mgt.	39	1	1	1	0
	MSN/Leadership MBA	60	23	22	23	12
	MSN/MHA	60	31	22	22	12
	MSEd. - School Educator	33	45	44	48	20
	MSEd. - Health Care	33	19	19	22	25
	MSEd. - School Leadership	36	52	46	55	15
	MSEd. - Catholic School Leadership	36	9	6	7	5
	MSEd. - Adult Educ. & Training	33	9	7	8	4
	MSEd. - School Admin.	33	-	-	-	17
	MHSA - Health Services Admin.	54	0	0	0	0
	Master of Health Administration	42	55	45	62	53
	MHA - Catholic Health Leadership	42	2	2	1	1
	MHA - Health Administration	42	4	1	0	0
	MSN - Nursing Education	42	61	46	43	19
	MSN - Nursing Administration	45	28	26	18	12
	MSN-AGACNP	48	0	2	18	30
	MSN - Primary Care FNP	48	104	91	120	89
	MSN - Nursing Administration	42	0	0	0	0
	MSN - Nursing Education	42	2	1	0	0
	MA - Pastoral Ministry	33	0	0	0	0
	MA - Pastoral Theology	33	8	1	2	0
	MA Theology - Pastoral Theology	36	82	79	91	74
	MA Theology - Sacred Theology	36	37	38	50	47
	MA Theology - Adv. Diaconal Studies	30	6	5	19	18
	Master of Divinity	90	10	8	14	10
	Master of Divinity (Accelerated)	90	4	6	7	3
	MA Theology - Sacred Theology (Co	36	1	0	0	0

MA Theology - Adv. Diaconal Studies	30	7	7	1	0	
MA Theology/Adv. Diaconal Studies	30	2	1	0	1	
Master of Divinity (Cohort)	90	1	1	1	1	

Doctorate (add more rows as needed)

?						

Total 0 0 0 0 0

First Professional (add more rows as needed)

?						

Total 0 0 0 0 0

Other; specify (add more rows as needed)

?						

Total 0 0 0 0 0

Total Graduate 31 22 22 12 0

* Enter here the number of credits students must complete in order to earn the credential (e.g., 36 credits in an M.B.A.)

Please enter any explanatory notes in the box below

Standard 6: Teaching, Learning, and Scholarship
(Number of Faculty by Department or Comparable Unit, Fall Term)

	3 Years Prior		2 Years Prior		1 Year Prior		Current Year	
	(FY 2018)		(FY 2019)		(FY 2020)		(FY 2021)	
	FT	PT	FT	PT	FT	PT	FT	PT
Number of Faculty by Department (or comparable academic unit); insert additional rows as needed								
Biology	6	2	7	1	8		8	
Business	6	6	5	6	5	2	6	
Communications	2		2		2		2	
Criminal Justice							1	
Education	3	5	4	4	4	4	4	3
English	4	3	4	3	3	3	3	3
Fine Art	2		1		2	1	2	
Foreign Language		3		3		3		3
Health/Wellness							1	
History	5	1	5	1	5		4	1
Math	2	1	2	1	2	1	2	
Natural Science	9		8		8		7	
Nursing	10	22	11	25	8	27	7	21
Online Education	1	20	1	19	1	13	1	15
Online Graduate Health Admin		7		8	1	7	1	8
Online Graduate MBA/MACC	1	14		14		13		16
Online Pastoral Theology		11		12		10		11
Online FNP			1		1		1	4
Online MSN	1	18	1	15	2	15	2	8
Online RN/BSN		1		3	2	3	2	4
Online Undergrad Business		2	1	1	1	1	1	2
Online Undergrad General Electives	1	13	1	8	1	9		10
Online Undergrad General Studies		9	1	11	1	8	1	8
Online Undergrad Health Admin	1	17	2	12		10		10
Online Undergrad Information Tech				1				
Online Social Work		2	2	2	2	5	1	5
Online Undergrad Theology		11	1	11	1	11	1	11
Philosophy	2		3		2		2	
Psychology	3		3		3		3	
Social Work	1	2	1	2	1	2		2
Sociology	3	1	2	4	3	4	2	
Sports Studies	6	3	5	2	6		5	1
Theology	3		3		3		3	
Total	72	174	77	169	78	152	73	146

Please enter any explanatory notes in the box below

FY counts represent IPEDS data as the following dates: FY2018=11/1/2017. FY2019=11/1/2018. FY2020=11/1/2019. FY2021=10/1/2020.

**Standard 6: Teaching, Learning, and Scholarship
(Appointments, Tenure, Departures, and Retirements)**

3 Years Prior		2 Years Prior		1 Year Prior		Current Year	
(FY 2018)		(FY 2019)		(FY 2020)		(FY 2021)	
FT	PT	FT	PT	FT	PT	FT	PT

Number of Faculty Appointed

Professor
Associate
Assistant
Instructor
No rank
Other

		1					
4		4		6		4	
				1			
	18		25	2	27		12
1		1					

Total

5 18 6 25 9 27 4 12

Number of Faculty in Tenured Positions

Professor
Associate
Assistant
Instructor
No rank
Other

10		8		9		9	
16		16		17		18	
4		4		3		2	

Total

30 0 28 0 29 0 29 0

Number of Faculty Departing

Professor
Associate
Assistant
Instructor
No rank
Other

1		1					
						1	
6		5		2		4	
						1	
3	33	2	5	1	16		9

Total

10 33 8 5 3 16 6 9

Number of Faculty Retiring

Professor
Associate
Assistant
Instructor
No rank
Other

		1				1	
				2			
				1		1	
				1			

Total

0 0 1 0 4 0 2 0

Please enter any explanatory notes in the box below

FT faculty with tenured status who moved to PT are not included in tenured count.