



January 24, 2022

Michael Geoghegan
Interim President and CFO
Eastern Gateway Community College
4000 Sunset Boulevard
Steubenville, OH 43952-3598

Sent electronically:
mgeoghegan@egcc.edu

Sent via Document Center at:
cod.ed.gov

Re: Announced **off-site** Program Review
OPE ID: 00727500

Dear President Geoghegan:

This letter confirms that an **off-site** Program Review has been scheduled to begin on February 7, 2022 at Eastern Gateway Community College (EGCC). You were notified via telephone of this review by Leslie Orofino on January 24, 2022. This review will be performed by Jenny Armontrout, Matthew Couch, Lytashia Davis, Roslyn Harris, Erica Haynes, Mark Kreutzer, Leslie Orofino, and Bridget Pratt. We will not be visiting the institution at this time. The program review will be conducted off-site.

This review will assess EGCC's administration of the Title IV, HEA programs in which it participates. The review initially will cover the 2017-18 through 2020-21 award years but may be expanded if appropriate. The Department of Education (Department) considers the administration of the Title IV, HEA programs to be an institution-wide effort. Consequently, the review will include all offices involved in the financial aid administration:

- Financial Aid office
- Registrar office
- Academic office
- Admissions office
- Fiscal/Business office

The review will also assess EGCC's partnerships with Student Resource Center (SRC) and the Union Plus Free College Benefit (Union Plus) (hereinafter referred to as the "Partners" or "Partnerships"). The review is to ensure the Department understands the scope of the functions and services that EGCC provides for these partners and how they relate to the administration of the Title IV, HEA programs.

At the start of the review, we will conduct a brief entrance conference with you and your staff, via telephone, to discuss the review process. The entrance conference is set for **February 7, 2022 at 10:00 am EST**. For the entrance conference, e-mail the contact information for the

individuals who will be in attendance (include names, titles, phone numbers, and e-mail addresses) to Leslie Orofino at Leslie.Orofino@ed.gov. The contact information must be submitted by close of business on **January 27, 2022**. Once the list is provided, Leslie Orofino will provide the access information for entrance conference. Our review will take as long as necessary to complete our work. Please inform the personnel responsible for the above areas, and any others you deem appropriate, so they or their designees can attend the entrance conference and remain available during the review. We may also need to interview students.

In preparation for the review, please provide the following information by the **due date specified in the below table**. Please upload the following documents to the COD Document Center (Program Review Sub Case Type, Institution Response selection) found at the Common Origination and Disbursement Web Site: <https://cod.ed.gov>. Documents containing personally identifiable information (PII) may be submitted securely to this site. Please refer to the training podcast available at the Knowledge Center for specific uploading instructions: <https://fsapartners.ed.gov/knowledge-center/library/podcasts/2020-08-14/partner-eligibility-and-oversight-services-document-center>.

Due Date	Item Number	Information Requested
1/28/2022	1.	Provide the data elements requested in the attached Recipient Data Spreadsheet (RDS). The RDS must include all students who received Title IV funds by award year and must include all students who participated in Partnerships with SRC and Union Plus by award year. The institution may choose to complete the provided file or generate its own spreadsheet if all the data elements are provided.
1/28/2022	2.	Provide read only and full access to the institution’s Learning Management System (LMS) and Student Information System (SIS) including instructions for accessing and navigating the LMS and SIS. We will need separate access for four reviewers.
1/31/2022	3.	All contracts between the institution and the Partners including all related subcontracts. Include all schedules, exhibits, and any related documents or agreements.
1/31/2022	4.	A list of all current and former EGCC personnel (faculty and staff) that are and were involved in the administration and coordination of the Partnerships. Please include their name, title, contact information (email address and phone number), a description of their role in relation to the Partnerships, and any salary structure or compensation package that is related to their role in the Partnership programs.
1/31/2022	5.	Any state or accreditor approvals related to Partnerships.
1/31/2022	6.	All guidelines, policies and procedures related to the Partnerships, including admission’s policies, financial aid processing policies, transfer credit policies, etc.
1/31/2022	7.	All marketing, recruitment and/or admissions documents related to the Partnerships.
2/1/2022	8.	Catalog/brochure of the institution
2/1/2022	9.	Policies and procedures concerning:

		<ul style="list-style-type: none"> - Admissions, institution, and academic programs - Satisfactory academic progress - Attendance - Withdrawals, official and unofficial - Return of Title IV funds - Verification - Awarding of Title IV, HEA program aid - Statements regarding the institution’s educational programs, its financial charges, or the employability of its graduates
2/1/2022	10.	A description of the salary structure and compensation packages offered to personnel engaged in admissions, or in supervising the admissions process and any institutional staff that makes decisions about the award of title IV funds must be provided. This includes any bonuses, incentive payments, or profit sharing arrangements; copies of employment contracts for each admissions position.
2/1/2022	11.	Guidelines, policies and procedures used to evaluate admissions/recruitment staff and to support adjustments to salary or any other form of compensation. (in the absence of documented guidelines, the school must provide a written narrative).
2/1/2022	12.	A list of all Third-Party Servicers and other contractors involved in marketing, recruitment, and/or admissions (if applicable), and the services they provide, including copies of contracts.
2/1/2022	13.	Institutional and financial aid student consumer publications
2/1/2022	14.	URLs for all financial aid consumer information
2/2/2022	15.	Provide the data elements requested in the attached Personnel Information spreadsheet by award year.
2/2/2022	16.	Examples of institutional forms, applications and worksheets that are used in administering the Title IV, HEA program
2/2/2022	17.	Total current enrollment and percentage receiving Title IV, HEA program aid
2/2/2022	18.	If applicable, notification of an enforcement action or prosecution brought against the institution by a State or Federal law enforcement agency in any matter where a final judgement against the institution, if rendered, would result in adverse action by an accrediting agency against the institution, revocation of State authorization, or limitation, suspension, or termination of eligibility under Title IV.
2/2/2022	19.	A list of all programs that are offered at physical campus locations.
2/2/2022	20.	A list of all programs that includes courses that are offered via distance education, regardless of the percentage (e.g. online) and whether or not the programs are eligible for Title IV.
2/2/2022	21.	Materials that explain the faculty role in regard to interaction with students in distance education courses (e.g. faculty contract, handbook, job description, policy, training materials).
2/2/2022	22.	Any instructions or materials provided to students for participation in online courses (including Web links)

2/2/2022	23.	The percentage of correspondence courses offered in the latest complete award year.
2/2/2022	24.	A list of all courses that are/were offered via correspondence in the latest complete award year, identifying those courses that are eligible for Title IV.

The Department has numbered each of the document requests above to facilitate the institution's response. When you are uploading documents, please identify the file by item number with a descriptive name using the fewest number of characters as possible. For example:

- 1 RDS
- 2 LMS access instructions
- 3 SRC Contract effective XX.XX.XX – XX.XX.XX

Please contact Leslie Orofino via e-mail at Leslie.Orofino@ed.gov after the documents have been uploaded, as no separate notification is sent by COD to indicate when files have been uploaded.

Once in receipt of the above requested documents, the Department will identify the specific records (electronic), that the institution must provide. The Department's protocol for an off-site review requires that the institution be given a limited time (generally 24-48 hours) to provide these records. Other records may be requested as needed throughout the review. We will provide time frames for the provision of these materials.

The institution must designate an individual to serve as the point-of-contact during the review process. In addition, it may be necessary for us to contact other institution officials throughout the course of the review.

Regulatory authority to examine program and fiscal records and conduct reviews may be found at 34 C.F.R. § 668.24.

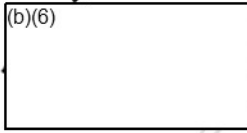
Please note, according to record retention requirements (34 C.F.R. § 668.24(e)(3)), "an institution shall keep all records involved in any loan, claim, or expenditure questioned by a Title IV, HEA program audit, program review, investigation, or other review until the later of the resolution of that questioned loan, claim, or expenditure; or the end of the retention period applicable to the record." Therefore, all records requested in this letter must be maintained for the duration of the record retention period.

At the conclusion of the review, the review team may conduct an exit or status conference with you and/or your designee(s). The institution will receive an official written report at a later date.

If you have any questions, please contact Leslie Orofino at (312) 730-1733 or Leslie.Orofino@ed.gov. Thank you for your cooperation.

Sincerely,

(b)(6)



Digitally signed by
Jeremy Early
Date: 2022.01.24
11:18:55 -06'00'

Jeremy Early, Ed.D.
Division Chief
Chicago/Denver School Participation Division

JE/lo

Enclosures:

Recipient Data Spreadsheet File (Excel)

Personnel Information File (Excel)

Protection of Personally Identifiable Information

cc: Kurt Pawlak, Interim Director of Financial Aid, kpawlak@egcc.edu
Ohio Department of Education , mexline@highered.ohio.gov
North Central Association of College and Schools, the Higher Learning Commission,
legalaffairs@hlcommission.org
Department of Defense, osd.pentagon.ousd-p-r.mbx.vol-edu-compliance@mail.mil
Department of Veterans Affairs, INCOMING.VBAVACO@VA.GOV
Consumer Financial Protection Bureau, CFPB_ENF_Students@cfpb.gov