Special Report
to the
Accrediting Commission for Community and Junior Colleges

Submitted
by
Oxnard College
4000 South Rose Avenue
Oxnard, CA 93033

Submitted
to
The Accrediting Commission for Community and Junior Colleges
Western Association of Schools and Colleges
10 Commercial Boulevard
Novato, CA 94949

October 15, 2012

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# CERTIFICATION OF THE *SPECIAL REPORT*
October 15, 2012

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           Western Association of Schools and Colleges
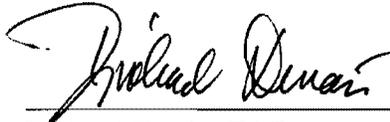
From: Oxnard College
           4000 South Rose Avenue
           Oxnard, CA 93033

This *Special Report* is submitted per the requirements of the Accrediting Commission of Community and Junior Colleges.

We certify that there was broad participation by the campus community in the preparation and review of the report, and we believe that the *Special Report* accurately reflects our response to date to the concerns identified by the Commission.
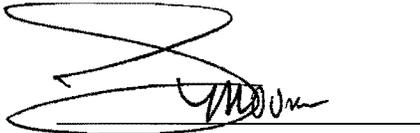
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Chair, Board of Trustees, Ventura County Community College District

Report Preparation

This Special Report is intended to address the ACCJC's concerns articulated in their letter to Oxnard College dated July 16, 2012. Specifically, the Commission received notification from the U.S. Department of Education about the audit of Title IV funds at the Ventura County Community College District, and expressed concerns regarding the recurrence of an audit finding with respect to the timely return of Title IV funds (R2T4), and the District's ability to meet Eligibility Requirement 5 (Administrative Capacity), Eligibility Requirement 18 (Financial Accountability), and Standards III.D.2 and III.D.3 (Financial Resources).

This report will address, as requested, the college's failure to resolve the audit finding issue when first raised, the steps undertaken to resolve compliance audit deficiencies in a timely manner, the college's administrative capacity to meet Title IV requirements, and additional internal controls now in place to manage the Title IV funds.

The following District Office/College staff provided input to this Special Report:

1. Dean of Oxnard College – Student Financial Aid function falls under this administrator's area of responsibility.
2. Financial Aid Officer for Oxnard College.
3. Data Analyst at the District Office – the Data Analyst is knowledgeable of and provided technical support for the prior Student Financial Aid database (PowerFAIDS) and is knowledgeable in the current system (Banner Financial Aid).
4. Director of Fiscal Services at the District Office – the Director is the external auditor liaison and is responsible for submitting the District's responses to all audit findings.

Documentation was provided from agendas, emails, notes and documentation developed during the implementation of Banner Financial Aid and in subsequent go-live training and meetings.

All members of the faculty, staff, and administration had the opportunity to review and suggest modifications to the document prior to its submission to the Board of Trustees for final review.

Response to the Commission Letter

Prior to the 2011-12 Aid Year, student financial aid award and disbursement data for each of the District's three colleges were in separate databases (PowerFAIDS) that did not integrate with the District's administrative software system (Banner). The R2T4 process required timely execution; however, it was primarily a manual process that was subject to human error.

Well before the release of the federal audit finding for Fiscal Year 2009-10, the District recognized the need for a fully integrated system to automate many critical processes like the calculation of R2T4, and so in March of 2010, the District began the implementation of the Banner Student Financial Aid module, for a target go-live date for the 2011-12 Aid Year. (Appendix A) As part of this 18-month conversion process, the first data load of Financial Aid students was scheduled in January of 2011, and the first disbursement for the 2011-12 Aid Year was scheduled for August 2011.

The District engaged the services of a consultant to assist with all aspects of the implementation, including training, development of data standards and conversion specifications.

As part of implementation, databases and reports were identified or developed, to ensure that responsible college Financial Aid Office staff had the necessary tools to complete the R2T4 process in a timely manner, for e.g.:

1. Withdraw Pending Status Change Report (SFRNOWD). This report identifies students who have zero enrollment hours but have not been officially withdrawn, and have grades that indicate they did not successfully complete the course.   (Appendix B)

2. Withdrawn Student Report (SFRWDRL). This report identifies students whose enrollment status has been changed to withdrawn and have no withdrawal record created yet. This report can also record the student's withdrawal date for Title IV purposes, and create a withdrawal record for those students who received Title IV funds. This report also identifies students for which the withdrawal record and the enrollment status code or date or total of original institutional charges has changed. (Appendix C)

3. Return of Title IV Funds Recipient Withdrawn Status Report (RPRTIVR). This report identifies and prints a summary of all the students who have had a withdrawal status code entered on their student record. The user can view just those students who have received Title IV funds, or students who have received any type of financial aid. In addition, the user can choose to view only the students who have had the Title IV repayment calculation performed. (Appendix D)

4. Return of Title IV Funds Calculation Process (RPRTIVC). This process calculates Title IV repayments for students who have withdrawn from the term. (Appendix E)

5. Return of Title IV Funds Withdrawal Calculation Report (RPRTIVI). (Appendix F) This report prints summarized Title IV repayment information from the Return of Title IV Funds Calculation Form (RPATIVC). The college Financial Aid staff can print information for a single student, a particular group of students, or all students falling within a date range specified.

In addition, during the 2011-12 Aid Year a R2 Early Alert database was developed to calculate the number of days leading to the R2T4 deadline for each student (Appendix G), and an R2T4 Worksheet was prepared for each college as a guide (Appendix H).

Training was provided, specifically on the R2T4 process, as follows:

1. College Financial Aid Officers received R2T4 training and resource publications on September 13, 2011. (Appendix I)

2. Two workshops were held for College Financial Aid staff responsible for processing R2T4, on November 16, 2011, and January 27, 2012. (Appendix J)

3. College Financial Aid Officers met via conference call to resolve R2T4 cases and other processing concerns (Appendix K)

With the successful implementation of Banner Financial Aid, student financial aid award and disbursement data for each of the three colleges are now fully integrated within the District's administrative software system. Oxnard College Financial Aid Office staff have the capability to access time-sensitive weekly student enrollment reports as well as a report that provides a listing of students who have withdrawn from classes, which allows staff to monitor these students on a more regular basis. Based on the results of their review of the system reports mentioned, Financial Aid Office staff are then able to run a process that adjusts a student's award and recoups the funds as required by reducing the amount available to the District for draw down by District Office staff through the Federal G5 payment system. That integration has provided for a number of calculations to be performed by the system, thus reducing the potential for human error.

The District Office will continue to coordinate training sessions on the R2T4 reconciliation process, will continue to assist the colleges in identifying reporting tools needed, and will monitor each college to ensure reconciliation is being performed on a monthly basis to ensure compliance with proper management of Title IV funds.

During FY 2012-13 the following activities were adopted as standard operating procedure:

1. Each college in the District will generate their own Withdrawal Report with the Banner report SFAWDRL and will provide to the District Office a signed copy of the Return of Title IV Funds Withdrawal Calculation Report (RPRTIVI), to provide assurances that the calculation is being performed on a timely and consistent basis throughout the aid year.

2. District Office staff will transmit/retrieve Title IV records at least twice a week, ensuring that the funds are returned timely to the United States Department of Education via the Federal G5 payment system.

3. R2T4 staff training dates have been set for September 7, 2012 and January 18, 2013. (Appendix L)

Oxnard College understands and accepts its responsibility to appropriately manage Title IV funds, and is confident that the staff now possess the tools and resources needed to ensure ongoing compliance and monitoring.

A positive illustration of that is evidenced by the fact that the District has received confirmation that there are no reportable R2T4 findings in the District's FY 2011-12 annual audit (Appendix M – pending).

Appendices

Appendix A - Banner Financial Aid Implementation Calendar

Appendix B - Withdraw Pending Status Change Report (SFRNOWD)

Appendix C - Withdrawn Student Report (SFRWDRL)

Appendix D - Return of Title IV Funds Recipient Withdrawn Status Report (RPRTIVR)

Appendix E - Return of Title IV Funds Calculation Process (RPRTIVC)

Appendix F - Return of Title IV Funds Withdrawal Calculation Report (RPRTIVI)

Appendix G - R2 Early Alert database

Appendix H - R2T4 Worksheet

Appendix I - Agenda and resource publications provided for R2T4 training on September 13, 2011

Appendix J - Agenda for January 27, 2012 training for R2T4

Appendix K - List of conference calls scheduled during the implementation to resolve R2T4 cases and other processing concerns

Appendix L - Email confirming Fiscal Year 2012-13 R2T4 training dates

Appendix M - Memo from District's contracted auditor regarding lack of any R2T4 findings for Fiscal Year 2011-12