## Title IV Program Responsibilities

This requirement has several components the institution must address. The institution staff compiling this information should work with the financial aid office and the chief financial officer or comptroller.

1. **General Program Responsibilities**

   a. Provide information regarding the status of the institution's Title IV program; in particular, submit information about recent findings from Title IV program reviews, inspections, or audits.

   **The most recent program review is attached.**

   b. Disclose any limitation, suspension, or termination actions that the U.S. Department of Education has undertaken and the reasons for those actions.

   **The U.S. Department of Education provided a limitation (Zone Alternative) for the 2013-2014 academic year due to the reduction in Westminster's composite financial ratio to 1.1 (as detailed in the attached 7/16/13 letter). However, because Westminster's composite financial ratio improved to 1.9, the U.S. Department of Education removed the Zone Alternative restrictions were removed, as documented in a 4/8/14 letter.**

   c. Disclose any fines, letters of credit, or heightened monitoring arising from the Department of Education. Explain the consequences of these challenges for the institution's short- and long-term financial health.

   **See 1.b. above.**

   d. Discuss the institution's response and corrective actions to these challenges.

   **Westminster agreed to comply with the Zone Alternative restrictions and has taken budgetary action to increase financial ratios, resulting in an increase in the composite financial ratio from 1.1 in FY12 to 1.9 in FY13. Preliminary calculations for FY14 indicate an increase in the composite financial ratio to 2.14.**

   e. Provide information about findings from the A-133 portion of the institution's audited financial statements that identify any material weaknesses in the processing of financial aid.

   **Information on the A-133 portion of Westminster's audited financial statements can be found on pp. 38-39 of the attached Final Single Audit Financial Statement.**

2. **Financial Responsibility Requirements.** Provide information about the Department of Education's review of the institution's composite ratios and financial audits.

   The Commission also annually analyzes each institution's financial ratios to determine whether there might be financial concerns. The team will check with the institution and with Commission staff regarding whether the Commission or the Department has previously raised concerns about an institution's finances based on these ratios. If so, the institution should have addressed in its documents the actions it has taken and plans to take in response to these concerns. *Related Commission Requirements: Core Component 5.A, 2.B; Assumed Practice D.1.*

   **Recent letters from the U.S. Department of Education and the Higher Learning Commission related to Westminster's composite ratios and financial audits are attached.**

3. **Default Rates**

*Note for 2012 and thereafter institutions and teams should be using the three-year default rate based on revised default rate data published by the Department in September 2012.*

The institution should take steps to avoid excessive loan default rates.

a. Disclose student loan default rates as provided by the Department for the three years leading up to the visit.

b. If the default rates are higher for the institution than its peer institutions, if rates are rising, or if rates have exceeded Departmental thresholds or triggered a Department review, then the institution should address the actions it has taken in response and submit to the team any corrective plan filed with the Department.

c. Submit information about the institution's participation in private loan programs and any loan services that it provides to students directly or that a related corporation provides to its students.

**Recent United States Department of Education default rate letters are enclosed.**

**Information about the institution's participation in private loan programs is enclosed.**

4. **Campus Crime Information, Athletic Participation and Financial Aid, and Related Disclosures.** Title IV responsibilities include the legal obligation to disclose information to students and to the public about campus crime, athletic participation and other information. Identify any findings from the Department regarding these disclosures.

Supporting information: Provide samples of those disclosures in the Resource Room.

**Campus crime information can be found at: http://www.westminster-mo.edu/explore/contactus/offices/plantops/security/Pages/CrimeStatistics.aspx**

**Information about athletic participation and financial aid can be found at: http://www.westminster-mo.edu/general/consumerinfo/Documents/eada1213.pdf**

5. **Student Right to Know.** Title IV responsibilities require that institutions provide graduation/completion for the student body by gender, ethnicity, receipt of Pell grants, and other data as well as information about the process for withdrawing as a student, cost of attendance, refund and return of Title IV policies, current academic programs and faculty, names of applicable accrediting agencies, description of facilities for disabled students, and the institution's policy on enrollment in study abroad. In addition, certain institutions need to disclose their transfer-out rate.

Supporting information: Identify any findings from the Department regarding these disclosures. Provide samples of these disclosures in the Resource Room.

*Related Commission Requirements: Assumed Practice A.6.*

**Information about graduation/completion rates can be found at:**

**Graduation Rate Disclosure: http://www.westminster-mo.edu/academics/resources/registrar/Documents/grd.pdf**
**Detailed Graduation Rate Disclosure: http://www.westminster-mo.edu/general/consumerinfo/Documents/DetailedGraduationRateDisclosureMay2013.pdf**
**Full and Part-Time Enrollment by Ethnicity and Gender: http://www.westminster-mo.edu/general/consumerinfo/Documents/CDS20132014B.pdf**
**Detailed Completion Rate Disclosure: http://www.westminster-mo.edu/general/consumerinfo/Documents/DetailedCompletionRateDisclosureMarch2011.pdf**

**The process for withdrawing as a student, cost of attendance, refund and return of Title IV policies, current academic programs and faculty, names of applicable accrediting agencies, description of facilities for disabled students, and the institution's policy on enrollment in study abroad can all be found in the 2014-2015 Academic Catalog, which can be accessed at: http://www.westminster-mo.edu/academics/resources/registrar/Documents/2014-15_Academic_Catalog.pdf**

6. **Satisfactory Academic Progress and Attendance Policies.** The institution is required to have a Satisfactory Academic Progress policy and an attendance policy as part of the Title IV program. Document that these policies are readily available to students, satisfy state or federal requirements, and are being appropriately applied by the institution in individual student situations. (Note that the Commission does not necessarily require that the institution take attendance but does anticipate that institutional attendance policies will provide information to students about attendance at the institution.)

**The following information appears in the 2014-2015 Academic Catalog (pp. 18-19) and also appears on the College website at: http://www.westminster-mo.edu/admissions/finaid/Documents/SAPPolicy.pdf**

Standards of Academic Progress (SAP) Evaluation

1. **SAP is calculated annually after the spring semester following the student's first term of enrollment as a regular degree-seeking student, including new students who are admitted on academic probation.**
2. **Quantitative (hours attempted and earned) and qualitative (cumulative GPA) SAP progress is measured.**
3. **Changes in major may alter your SAP status, which is based upon the current degree level pursued; therefore, if you change majors, you may be permitted to go beyond the 183 attempted hours.**
4. **Students meeting the standards listed above when calculated will be in SAP Good Standing.**
5. **SAP Suspension will be imposed for students not meeting the requirements shown above, and they will be ineligible for financial aid during the period of suspension. (See Appeals.)**

6. Rules are applied uniformly to all students for all periods of enrollment whether or not aid has been received previously.
7. Students who are on academic dismissal will be on SAP Suspension (See Appeals.)
8. Eligibility is reestablished after the student improves their academic record to meet the minimum standards or an appeal due to unusual and/or mitigating circumstances is approved.
9. Students are held responsible for knowing SAP eligibility criteria and their status at the end of each academic year. Please contact the Office of Financial Aid if questions arise.

Grades

1. All courses taken at Westminster College and those courses transferred to Westminster College are counted as hours attempted regardless of grade assigned. This includes courses which end as incompletes, failed, dropped, repetitions or withdrawn after the 3rd week of class each semester.
2. Only courses for which final grades are issued are recognized by the Westminster College Registrar's Office as acceptable for progressing toward degree completion and will be counted as earned.
3. Courses shown as failed, incomplete, withdrawn, dropped or concluded with no grade submitted count as hours attempted and not earned. Additional courses with non-passing results are counted similarly.
4. All courses designated as repeated for grade improvement count as hours attempted, but only count once if passed as hours earned.
5. Courses attempted repetitively for credit count as both hours attempted and if passed as hours earned.
6. Audit and Non-credit classes are ineligible for financial aid and do not count in SAP calculations. The official institutional GPA determined by the Westminster College Registrar's Office is used for all qualitative measures.

Additional Earned Credits

1. Credit hours earned by testing or other non-standard means are counted in the SAP calculations as both hours attempted and earned. This includes hours earned from Credit by Exam, CLEP and CEEB Tests, AP and IB Courses, and Foreign Language Placement.
2. All credit hours applicable to the current degree pursuit attempted through study abroad programs, off-campus programs, and through Consortium Agreements with other institutions count in both attempted and earned calculations.

Transfer Students

1. Transfer students with no grade history at Westminster College will enter on SAP Good Standing

2. **Complete academic transcripts for work attempted at other institutions are expected to be submitted to the Office of Enrollment Services before the beginning of their first semester at Westminster College. A standard SAP calculation including this work and Westminster College hours will be run by the next scheduled increment.**
3. **Students failing SAP will be placed on SAP Suspension, and they will be ineligible for financial aid during the period of suspension. (See Appeals.)**

Re-admit Students

1. **Former Westminster College students who were not enrolled at Westminster College for the most recent semester will re-enter at the SAP status earned at the end of their last Westminster College enrollment.**

Appeals and Reinstatement

1. **SAP Suspension may be appealed if unusual and/or mitigating circumstances affected academic progress. Such circumstances may include a severe illness or injury to the student or an immediate family member, the death of a student's relative, student activation into military service or other circumstances as deemed appropriate for consideration by the SAP Appeals Committee.**
2. **To appeal, the student must submit a letter to the Office of Financial Aid no later than 15 business days before the beginning of the semester for which reinstatement is desired. This should explain in detail why they failed to meet the minimum SAP standards, what unusual and/or mitigating circumstances caused the failure, and how their situation has improved to allow the student to meet the SAP standards at the next evaluation.**
3. **The SAP Appeal Committee's decision will be sent to the student by mail or electronic means. Approvals will be granted for students who will be able to meet SAP standards by the end of the next payment period, or the student will be placed on an academic plan that will ensure the student is able to meet SAP standards by a specific point in time.**
4. **Appeal approval notifications will give the conditions and timeframe for maintaining aid eligibility.**
5. **Students with approved appeals will be placed on SAP probation for the next enrollment period. At the end of that enrollment period, the student's SAP status will be re-evaluated. In order for the student to remain eligible for financial aid, the student must be meeting the SAP standards or successfully following the academic plan provided in the SAP probation letter.**
6. **SAP Appeals Committee decisions cannot be appealed to another source.**
7. **Students who raise their cumulative standards to equal or exceed the minimum requirements should contact the Director of Financial Aid to see if they may be reinstated to SAP Good Standing from that point forward.**

8. **The SAP Appeals Committee members are the Dean of Student Life, Associate Dean of Faculty, and Registrar.**

7. **Contractual Relationships.** Disclose contracts with third-party entities not accredited by a federally recognized accrediting agency. (The institution should have previously disclosed to the Commission all existing contracts and received approval for those contracts. The Commission's substantive change policy requires that the institution notify the Commission of any new contracts for up to 25 percent of an academic program, that the institution obtain prior Commission approval before initiating any contract for 25 to 50 percent of a program, and that the Commission approve contracts for more than 50 percent of a program only in exceptional circumstances under strict scrutiny. The institution should review the document, "*Information on Contractual and Consortial Arrangements,*" for more information. *Related Commission Requirements: Assumed Practice A.10.)*

**Westminster does not have contractual relationships with such third-party entities.**

8. **Consortial Relationships.** Disclose consortial relationships with other entities accredited by a federally recognized accrediting agency. (The institution should have previously disclosed all consortial relationships to the Commission. The Commission's substantive change policy requires that the institution notify the Commission of any new consortium for 25 to 50 percent of an academic program and that the institution obtains prior Commission approval for any consortium that offers 50 percent or more of an academic program. The institution should review the document, "*Information on Contractual and Consortial Arrangements,*" for more information. *Related Commission Requirements: Assumed Practice A.10.)*

**Westminster is part of the Mid-Missouri Associated Colleges and Universities (MMACU) Consortium.**

**MMACU was formed in 1964 to encourage the sharing of experiences and resources among its members. In addition to Westminster, consortium institutions include Lincoln University, Stephens College, William Woods University, and the University of Missouri-Columbia. Full-time undergraduate students of the five MMACU institutions may take courses for credit at any of the five campuses on a space-available basis with the permission of their home institution.**

**The intent of cross-registration is to support students' educational needs when a desired course is unavailable at the home institution or when there are inherent schedule conflicts. To qualify for cross-registration, a student must be in good academic standing and enrolled full-time as an undergraduate. Non-native English speakers must meet all English language proficiency requirements of the school in which they wish to enroll.**

Monday, August 02, 2011

Dr. George B Forsythe, President
Westminster College
501 Westminster Avenue
Fulton, MO 65251-1299

Overnight Mail, Tracking # MO 652 9-01

RE: **Final Program Review Determination**
OPE ID: 00252300
PRCN: 201120727463

Dear Dr. Forsythe:

The U.S. Department of Education's (Department's) School Participation Team – Kansas City issued a program review report on May 25, 2011 covering Westminster College (Westminster) administration of programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), for the 2009-2010 and 2010-2011 award years. Westminster's final response was received on June 22, 2011.

The School Participation Team – Kansas City has reviewed Westminster's response to the Program Review Report. A copy of the program review report (and related attachments) and Westminster's response are attached (See Appendix A and B). Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by Westminster 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.

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

Program records relating to the period covered by this program review must be retained until the later of: the resolution of the loan(s), claim(s) or expenditure(s) questioned in the program

review [34 C.F.R. § 668.24(e)(3)(i)] or the end of the retention period applicable to the record [34 C.F.R. § 668.24(e)(1) and (e)(2)].

If you have any questions please call William R. Hudson at (816) 268-0425.

Sincerely,

Ralph A. Lobosco
Area Case Director

Enclosure: Program Review Report (with attachments)
Westminster's Response to the Program Review Report

cc: Aimee S. Bristow, Financial Aid Administrator
Director, Missouri Coordinating Board for Higher Education
Director, North Central Association of Colleges and Schools - CIHE (Higher Educ)

WILLIAMS KEEPERS LLC
CERTIFIED PUBLIC ACCOUNTANTS & CONSULTANTS

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# INDEPENDENT AUDITORS' REPORT ON COMPLIANCE FOR EACH MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE AS REQUIRED BY OMB CIRCULAR A-133

To the Board of Trustees of
Westminster College
Fulton, Missouri

## Report on Compliance for Each Major Federal Program

We have audited Westminster College's (the College) compliance with the types of compliance requirements described in the *OMB Circular A-133 Compliance Supplement* that could have a direct and material effect on each of the College's major federal programs for the year ended June 30, 2014. The College's major federal programs are identified in the summary of audit results section of the accompanying schedule of findings and questioned costs.

### *Management's Responsibility*

Management is responsible for compliance with the requirements of laws, regulations, contracts, and grants applicable to its federal programs.

### *Auditors' Responsibility*

Our responsibility is to express an opinion on compliance for each of the College's major federal programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with U.S. generally accepted auditing standards; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and *OMB Circular A-133, Audits of States, Local Governments, and Non-Profit Organizations*. Those standards and OMB Circular A-133 require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the College's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for each major federal program. However, our audit does not provide a legal determination of the College's compliance.

### *Opinion on Each Major Federal Program*

In our opinion, the College complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2014.

## Report on Internal Control over Compliance

Management of the College is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the College's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with OMB Circular A-133, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the College's internal control over compliance.

A *deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of OMB Circular A-133. Accordingly, this report is not suitable for any other purpose.

Williams Keepers LLC

December 8, 2014

WESTMINSTER COLLEGE

SCHEDULE OF FINDINGS AND QUESTIONED COSTS
Year Ended June 30, 2014

A. SUMMARY OF AUDIT RESULTS

1 The auditors' report expresses an unmodified opinion on the financial statements of Westminster College.

2. A significant deficiency relating to the audit of the financial statements are reported in the "Independent Auditors' Report on Internal Control over Financial Reporting and on Compliance and Other Matters based on an Audit of Financial Statements Performed in Accordance with *Government Auditing Standards.*" This is not considered to be a material weakness.

3. No instances of noncompliance material to the financial statements of Westminster College were disclosed during the audit.

4. No material weaknesses relating to the audit of the major federal award programs are reported in the "Independent Auditors' Report on Compliance for Each Major Program and on Internal Control Over Compliance as Required by OMB Circular A-133."

5. The auditors' report on compliance for the major federal award programs for Westminster College expresses an unmodified opinion.

6. No audit findings relative to the major federal award programs for Westminster College are reported in Part C of this Schedule.

7. The programs tested as major programs include:

| | Federal CFDA Number |
|---|---|
| Federal Pell Grant Program | 84.063 |
| Federal Supplemental Educational Opportunity Grants | 84.007 |
| Federal Work-Study Program | 84.033 |
| Federal Perkins Loan Program | 84.038 |
| Federal Direct Student Loans | 84.268 |

8. The dollar threshold used to distinguish between Type A and B programs, as described in Section 520(b) of OMB Circular A-133, was $300,000.

9. Using the criteria as defined in Section 530 of OMB Circular A-133, Westminster College did not qualify as a low-risk auditee for the year ended June 30, 2014.

## B. FINDINGS--FINANCIAL STATEMENT AUDIT

### Finding 2014-001: Recording of Contributions (significant deficiency)

*Statement of Condition:* The College's procedures for classifying donor contributions in its general ledger by net asset classification are not sufficient to ensure the classifications are recorded in accordance with generally accepted accounting principles.

*Criteria:* Contributions should be reported in the financial statements based on whether they are restricted or not and whether they are for long-term purposes (endowment gift and property additions) or current use. It is important that there be a clear audit trail between the general ledger classifications and the classifications that are evidenced in the detailed records supporting the recorded contributions and that procedures ensure the classifications are consistent with each other.

*Effect of Condition:* There is an increased risk that inconsistencies in classifications of contributions will exist and not be detected and corrected in a timely manner. During our testing of contributions, we identified one contribution that was recorded as temporarily restricted although the donor requested a permanently restricted endowment be established with the funds.

*Cause of Condition:* The Business Office did not have sufficient procedures in place to identify significant errors made in information provided to it by the Development Office that is used to classify contributions in accordance with generally accepted accounting principles.

*Recommendation:* We recommend the Business Office strengthen its oversight, monitoring and review of the Development Office's coding of contributions for the general ledger.

*Management's Response*: Once notified of this error, an endowment was created for this contribution. The College also implemented a new procedure that requires documentation on contributions of over $25,000 be reviewed by individuals within both the Development Office and Business Office, and for both to sign a form that documents agreement on the classification of such gifts in the general ledger.

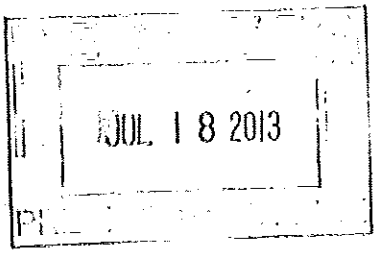
## C. FINDINGS AND QUESTIONED COSTS--MAJOR FEDERAL AWARD PROGRAMS AUDIT

None.

July 16, 2013

Dr. George Forsythe, President
Westminster College
501 Westminster Ave.
Fulton, MO 65251

Certified Mail
Return Receipt Requested
#7012 2210 0001 5414 1676




RE: Zone/Letter of Credit Alternative
OPE ID: 00252300

Dear Dr. Forsythe:

The School Participation Division-Kansas City (SPD) has completed its review of the fiscal year ended 6/30/2012 audited financial statements of Westminster College (WC).

In assessing the financial strength of WC, our financial analyst reviewed the financial statements using the indicators that are set forth in regulations at 34 C.F.R. § 668.171.

**Financial Ratios 34 C.F.R. § 668.171(b)(1)**

These statements yield a composite score of 1.1 out of a possible 3.0. A minimum score of 1.5 is necessary to meet the requirement of the financial standards. Accordingly, WC fails to meet the standards of financial responsibility as described in 34 C.F.R. § 668.172, Financial Ratios.

In view of its failure to meet the financial responsibility standards, WC may continue to participate in the Title IV, HEA programs by choosing one of two alternatives:

**1. Zone Alternative (34 C.F.R. § 668.175(d)(2))**

**1(a) Method of Payment** – Under the Zone Alternative, the institution is required to make disbursements to eligible students and parents under either the cash monitoring or reimbursement payment method as described under 34 C.F.R. § 668.162(d) and (e). If the institution selects the Zone Alternative, the institution will be placed on the cash monitoring 1 payment method.

Under the cash monitoring 1 payment method, the Institution must first make disbursements to eligible students and parents before it requests or receives funds for the amount of those disbursements from the Department. The funding request may not exceed the amount of the actual disbursements that were made to the students and parents included in the funding request. The Institution is permitted to draw down funds through the Department's electronic system for grants management and payments, G5, for the amount of disbursements it made to eligible students and parents so long as the student accounts are credited before the funding requests are initiated. The Institution may credit student accounts and draw Federal funds on the same banking day.

**1(b) Notification Requirements** - Under the Zone Alternative, the Institution is required to provide information to the SPD by certified mail, e-mail, or facsimile no later than 10 days after any of the oversight or financial

events, as described below, occur. The Institution must also include with the information it submits, written notice that details the circumstances surrounding the event(s) and, if necessary, what steps it has taken or plans to take, to resolve the issue.

- Any adverse action, including probation or similar action, taken against the Institution by its accrediting agency, State of Missouri or other Federal agency;
- Any event that causes the Institution, or related entity as defined in the Statement of Financial Accounting Standards (SFAS) 57, (ASC 850), to realize any liability that was noted as a contingent liability in the Institution's or related entity's most recent audited financial statements;
- Any violation by the Institution of any loan agreement;
- Any failure of the Institution to make a payment in accordance with its debt obligations that results in a creditor filing suit to recover funds under those obligations;
- Any withdrawal of owner's equity/net assets from the Institution by any means, including by declaring a dividend;
- Any extraordinary losses as defined in accordance with Accounting Principles Board (APB) Opinion No. 30, (ASC 225); or
- Any filing of a petition by the Institution for relief in bankruptcy court.

**1(c) Auditor's Attestation Requirement** - Additionally, as part of its compliance audit, the Institution must require its auditor to express an opinion on its compliance with the requirements under the Zone Alternative, including its administration of the payment method used to receive and disburse program funds.

**2. Letter of Credit Alternative (34 C.F.R. § 668.175(c))**

Under this alternative, the Institution is required to submit an irrevocable letter of credit in the amount of $3,619,127. This amount represents 50% of the Title IV, HEA program funds received by the Institution during its most recently completed fiscal year. By choosing this option, the Institution qualifies as a financially responsible institution.

The irrevocable letter of credit must be made payable to the Secretary, U.S. Department of Education. The letter of credit is necessary in the event that the Institution would close or terminate classes at other than the end of an academic period. It assures the Secretary that funds would be available from which to make refunds, provide teach-out facilities and meet institutional obligations to the Department.

A sample irrevocable letter of credit is enclosed. WC's letter of credit must be issued by a United States bank. Your lending institution must use this format on its letterhead with no deviation in the language contained therein. The letter of credit must provide coverage until 9/30/2014. The irrevocable letter of credit must be received prior to the 75 calendar days from the date of this letter.

Please mail the irrevocable letter of credit to the following address:

Veronica Pickett, Director
Performance Improvement and Procedures Service Group
U.S. Department of Education
Federal Student Aid/Program Compliance
830 First Street, NE, UCP3, MS 5435
Washington, DC 20002-8019

WC is required to notify the SPD within 3 calendar days, in the event the letter of credit issuing institution should fail, resulting in financial transactions and operations being administered by the Federal Deposit Insurance Corporation. WC will also be required to submit a new replacement letter of credit issued by a different and non-failed U.S. bank, within 75 calendar days.

WC must notify the Department of their selection of one of these two alternatives in writing to this office within 14 days of receipt of this letter. Please note that if WC elects to provide the irrevocable letter of credit and fails to provide the letter of credit within 75 calendar days, the Institution may be referred to the Department's Administrative Actions and Appeals Service Group for initiation of termination proceedings under 34 C.F.R. § 668.86 and/or other adverse actions. Also, note that information regarding the financial analysis score, results, and the letter of credit is subject to the Freedom of Information Act (FOIA) of 1966, as amended.

U.S. Department of Education
School Participation Division-Kansas City
1010 Walnut Street, Suite 336
Kansas City, MO 64106
ATTN: Rhonda Puffer, Financial Analyst

E-mail address: rhonda.puffer@ed.gov
Fax Number: (816) 268-0444

If you have any general questions regarding this matter, or disagree with the reason or methodology used for this determination, please contact Rhonda Puffer, Financial Analyst, within 30 calendar days at (816) 268-0547.

Sincerely,

Ralph LoBosco
School Participation Division- Kansas City Director

Enclosures: Sample Irrevocable Letter of Credit

cc: North Central Association of Colleges and Schools
MO Coordinating Board of Higher Education

Higher Learning Commission
A commission of the North Central Association

230 South LaSalle Street, Suite 7-500 | Chicago, IL 60604-1411
312-263-0456 | 800-621-7440 | Fax: 312-263-7462 | ncahlc.org

August 5, 2013

Dr. George B. Forsythe
President
Westminster College
501 Westminster Ave.
Fulton, MO 65251-1299

Dear President Forsythe:

The Higher Learning Commission received and reviewed your institution's financial data for the 2012-2013 Institutional Update. As a result of that review, the Commission is concerned that your institution might be experiencing some financial difficulty as suggested by your low composite scores. The process used in making this determination is detailed below.

The Commission annually collects a defined set of institutional financial indicators. For private institutions, the Commission used the financial ratios required by the U.S. Department of Education (USDE); for public institutions, the Commission relied on the financial ratios recommended in *Strategic Financial Analysis for Higher Education: Identifying, Measuring & Reporting Financial Risks (Seventh Edition)*, by KPMG LLP; Prager, Sealy & Co., LLC; Attain LLC. The Commission's Financial Composite Index Evaluation Table is attached.

According to our records, your institution's composite scores, which were reported from June 2012 fiscal year, were in the low range the past year. If the financial portion of your 2013-2014 Institutional Update shows similar or declining composite scores, the Commission may refer your institution to a Financial Panel for review. You will be notified in advance if such a review is scheduled.

To acknowledge receipt of this letter, please have your Chief Financial Officer send a signed letter either confirming the financial information that was reported to the Commission, or a signed letter that requests modifications to the financial information submitted, with supporting documentation, if applicable, to Lil Nakutis, Process Administrator, Accreditation Services, (lnakutis@hlcommission.org) ***no later than September 24, 2013.***

If you have any questions or comments, please feel free to contact Lil Nakutis or Pat Newton-Curran (pnewton@hlcommission.org).

The Higher Learning Commission

WESTMINSTER COLLEGE

Higher Learning Commission
230 South LaSalle Street, Suite 7-500
Chicago, IL 60604-1411
ATTN: Lil Nakutis
Process Administrator, Accreditation Services

RE: Financial Composite Score for Fiscal Year 2012

Dear Lil,

Westminster College acknowledges receipt of your letter dated August 5, 2013 confirming our Composite Financial Index (CFI) score of 1.1 for the fiscal year ended June 30, 2012.

The College and our auditors certainly intend to comply with the federal requirements as we work to improve our CFI score for the fiscal year ended June 30, 2013.

Sincerely,

Philip J. Daniels

Philip J. Daniels, MBA
Vice President for Business & Chief Financial Officer

April 8, 2014

Dr. George B. Forsythe
Westminster College
501 Westminster Ave.
Fulton, MO 65251

Certified Mail
Return Receipt Requested
**#7012 3460 0003 3126 4372**

RE: Release from Zone Alternative Letter
Deficiency Notification
OPE ID: 00252300

Dear Dr. Forsythe:

The School Participation Division – Kansas City (SPD) has completed its review of the fiscal year ended 6/30/2013 audited financial statements of Westminster College.

In assessing the financial strength of Westminster College, our financial analyst reviewed your financial statements using the indicators that are set forth in regulations at 34 C.F.R. §668.171. These statements yield a composite score of 1.9 out of a possible 3.0. Therefore, effective the date of this letter, Westminster College will no longer be required to comply with the Zone Alternative restrictions, including Cash Monitoring 1 Payment Method, previously imposed on the institution by our letter of 7/16/2013.

Although the Westminster College meets the factors of financial responsibility as described in 34 C.F.R. § 668.171 and its submission is considered complete, we note the existence of a reporting deficiency of failure to provide the required related party transactions disclosure as required by 34 C.F.R. § 668.23(d).on its financial statements. Specifically, the Department of Education requires disclosure for related party transactions to include all related parties and at a level detail that would enable the Department of Education to review all the related party transactions. The disclosure may include, but is not limited to, the name, location and a description of the related entity including the nature and amount of any transaction between related party and the institution, financial or otherwise, regardless of when it occurred

The SPD has accepted Westminster College's fiscal year ending 6/30/2013 audited financial statement submission. To facilitate a more thorough review of future financial statements, it is important that any subsequent financial statement submissions be prepared with the required disclosures

If you have any general questions regarding this matter, or disagree with the reason or methodology used for this determination, please contact Rhonda Puffer, Financial Analyst, within 30 calendar days at (816) 268-0547.

Sincerely,

Ralph LoBosco
School Participation Division – Kansas City Director

cc: North Central Association of Colleges and Schools CIHE
Missouri Coordinating Board of Higher Education

# IRREVOCABLE LETTER OF CREDIT

<Insert name, address and telephone number of issuing bank>

*To beneficiary:*
U.S. Department of Education
ATTN: Veronica Pickett, Director
Performance Improvement and Procedures Service Group
Federal Student Aid/Program Compliance
830 First Street, NE, UCP3, MS 5435
Washington, DC 20002-8019

**Date:** <Insert Date LOC Issued>
**Amount:** $ <Insert U.S. Dollar amount>
**Expiration Date:** <Insert Date>

Dear Sir/Madam:

We hereby establish our Irrevocable Letter of Credit Number <Insert LOC Number> in your favor for the account of:

<Insert Name and Address of Institution>
**OPE-ID #:** <Insert 8 digit Office of Postsecondary Education ID number>

Hereafter, <Insert Name of Institution> ("Institution"), presents, in the amount of $<Insert Dollar Amount> (U.S. dollars), available by your draft (or drafts drawn on us) at sight accompanied by:

a) the original of this letter of credit instrument (along with originals of all amendments), and
b) a statement signed by the Secretary ("Secretary"), U.S. Department of Education ("Department"), or the Secretary's representative, certifying that the drafted funds will be used for one or more of the following purposes, as determined by the Secretary:
    1) to pay refunds of institutional or non-institutional charges owed to or on behalf of current or former students of the Institution, whether the Institution remains open or has closed,
    2) to provide for the "teach-out" of students enrolled at the time of the closure of the Institution, and
    3) to pay any liabilities owing to the Secretary arising from acts or omissions by the Institution, on or before the expiration

of this letter of credit, in violation of requirements set forth in the Higher Education Act of 1965, as amended ("HEA"), including the violation of any agreement entered into by the Institution with the Secretary regarding the administration of programs under Title IV of the HEA.

Should the Institution fail to renew the letter of credit within ten (10) days prior to its expiration, as directed by the Department, the Department may call the letter of credit and place the funds in an escrow account at the Department pending a prompt determination of the extent to which those funds will be used in accordance with subparagraphs 1) through 3), above.

We hereby agree with you that partial drawings are permitted and that drafts drawn under and in compliance with the terms of this letter of credit will be duly honored upon due presentation at our offices on or before the expiration date of this letter of credit.

This letter of credit is subject to the International Standby Practices (ISP98), International Chamber of Commerce Publication Number 590.

| _____ | _____ | _____ |
|---|---|---|
| Printed Legal Name | Authorized Signature | Date Signed |

_____
Printed Official Title of Authorized Signer

UNITED STATES DEPARTMENT OF EDUCATION
WASHINGTON, D.C. 20202
September 2013

Westminster College
501 Westminster Avenue
Fulton, MO 65251-1299
NL01

OPE ID: 002523
FY 2011 Cohort Default Rate: 5.3

RE: FY 2011 Official Cohort Default Rate Notification Letter

Dear President:

This letter officially notifies you of your school's fiscal year (FY) 2011 cohort default rate based on Federal Family Education Loan (FFEL) Program and/or William D. Ford Federal Direct Loan (Direct Loan) Program loans made to students for attendance at your school. Your school's FY 2011 cohort default rate is shown above. Please note that even if your school is no longer participating in the student loan program(s), federal law requires the U.S. Department of Education (Department) to notify your school of its cohort default rate.

Note: The FY 2011 2 year cohort default rate will be the last two year cohort default rate released. Next year, in 2014 the FY 2011 three year cohort default rate will be the only cohort default rate released.

Since the Department is no longer mailing hardcopies of the cohort default rate notification letters to any schools, please refer to http://www.ed.gov/offices/OSFAP/defaultmanagement/ecdr.html for a description of the other files that the Department transmitted to you along with this letter.

WHAT FORMULA DID THE DEPARTMENT USE TO CALCULATE MY SCHOOL'S RATE?

The Department uses one of three methods for calculation of cohort default rates:

1.Official non-average rate for schools with 30 or more borrowers entering repayment,
2.Official average rate for schools with 29 or fewer borrowers entering repayment, and
3.Unofficial rate for schools with 29 or fewer borrowers entering repayment with less than three years of data.

For a complete explanation of the three types of rates, please see Chapter 2.1 of the Cohort Default Rate Guide, How the Rates are Calculated, available at http://ifap.ed.gov/DefaultManagement/guide/CDRGuidePart2.html.

WHAT TYPES OF LOANS DID THE DEPARTMENT INCLUDE IN MY SCHOOL'S RATE CALCULATION?

The Department included three types of loans in your school's cohort default rate calculation:

1) Federal Stafford Subsidized and Federal Stafford Unsubsidized Loans

2) Federal Direct Subsidized and Federal Direct Unsubsidized Loans

3) Federal Supplemental Loans for Students (Federal SLS Loans). Although rare, it is possible for Federal SLS loans to be included in your school's cohort default rate calculation.

WHAT LOAN RECORD DETAIL REPORT (LRDR) ACCOMPANIES THIS NOTIFICATION LETTER?

If your school's FY 2011 official cohort default rate is a non-averaged rate, the LRDR that accompanies this letter reflects all loans that went into repayment during FY 2011. If your school's FY 2011 official cohort default rate is an averaged rate, the LRDR that accompanies this letter reflects all loans that went into repayment during FY 2011, FY 2010 and FY 2009.

Please note that if a technical problem caused by the Department results in an inability to access the data, schools have five business days from the receipt of the eCDR notification package to notify Operations Performance Division at the email address given below. All schools must meet the established submission timeframes for cohort default rate adjustments and appeals. The Department will not review adjustments and appeals that any school submits outside of the established timeframes.

For more information on how to read the loan record detail report, please refer to Chapter 2.3 of the Cohort Default Rate Guide, Reviewing the Loan Record Detail Report, available at http://ifap.ed.gov/DefaultManagement/guide/CDRGuidePart2.html.

WHAT SANCTIONS AND BENEFITS APPLY TO MY SCHOOL BASED ON THIS RATE?

According to the Higher Education Act of 1965 (HEA), as amended, the Higher Education Reconciliation Act of 2005 (HERA), Pub.L.109-71 and the Department's regulations, your school is not subject to any sanctions based on your school's FY 2011 cohort default rate. However, if your school's official FY 2011 cohort default rate is 25.0 percent or greater, the Department may provisionally certify your school when your school applies for recertification to participate in the Federal Student Aid Programs. For more information about provisional certification, please refer to 34 C.F.R. Section 668.16(m)(1) and (2)(i) or contact the School Participation Management Division at 202-377-3173.

If your school's most recent official cohort default rate is less than 5.0 percent and your school is an eligible home institution that

certifies/originates a loan to cover the cost of attendance in a study abroad program, your school is eligible for this benefit. Your school may disburse/deliver loan proceeds in a single installment and may choose to release loan proceeds to first-year, first-time borrowers prior to 30 calendar days after the first day of the borrower's program of study. Once your school receives notice from the Department that your school's official cohort default rate is 5.0 percent or greater, this benefit will end within 30 calendar days of the notification.

Institutions with a cohort default rate of less than 15.0 percent for each of the three most recent fiscal years for which data are available, including eligible foreign institutions, may disburse, in a single installment, loans that are made for one semester, one trimester, one quarter, or a four-month period. Such an institution is also no longer required to delay the delivery or disbursement of the first disbursement of a loan for 30 days for first-time, first-year undergraduate borrowers.

Once your school receives notice from the Department that your school's official cohort default rate is 15.0 percent or greater, this benefit will end within 30 calendar days of the notification.

For more information on the sanctions and the benefits associated with official cohort default rates, please refer to Chapter 2.4 of the Cohort Default Rate Guide, Cohort Default Rate Effects, available at http://ifap.ed.gov/DefaultManagement/guide/CDRGuidePart2.html.

WHY DOES THIS LETTER SAY THAT MY SCHOOL IS NOT SUBJECT TO SANCTIONS BUT MY RATES EXCEED THE SANCTION THRESHOLD?

If your school has official FY 2011, FY 2010, and FY 2009 cohort default rates that are 25.0 percent or greater or your school has an official FY 2011 cohort default rate that is greater than 40.0 percent, your school is NOT subject to the loss of FFEL Program, Direct Loan Program, and/or Federal Pell Grant Program eligibility because your school met one or more of the following criteria:

| FY 2011, FY 2010, FY 2009 Cohort Default Rates >= 25.0% | FY 2011 Cohort Default Rate > 40.0% |
|---|---|
| At least two of your school s three most recent cohort default rates are official average cohort default rates and would be less than 25.0 percent if the Department had calculated the rate using the data for that cohort fiscal year alone. | Your school s FY 2011 cohort default rate is an official averaged cohort default rate. |
| Thirty or fewer borrowers entered into repayment during your school s three most recent official cohort default rates. | |
| Your school submitted a successful participation rate index challenge/appeal based on your school s draft FY 2011 cohort default | |

|rate, official FY 2010 cohort default rate, or official FY 2009 |
|cohort default rate. |
|---|
|Your school entered into a settlement agreement with the U.S. |
|Department of Education that supersedes any sanctions the Department |
|would apply based on cohort default rate calculations. |
|---|

WHAT RIGHTS DOES MY SCHOOL HAVE TO APPEAL THIS RATE INFORMATION?

Based on your school's FY 2011 cohort default rate, your school may be eligible to submit the following adjustments/appeals:

Uncorrected Data Adjustment
http://ifap.ed.gov/DefaultManagement/guide/CDRGuidePart4.html

Loan Servicing Appeal
http://ifap.ed.gov/DefaultManagement/guide/CDRGuidePart4.html

New Data Adjustment
http://ifap.ed.gov/DefaultManagement/guide/CDRGuidePart4.html

Averaged Rates Appeal
http://ifap.ed.gov/DefaultManagement/guide/CDRGuidePart4.html

Thirty-or-fewer Borrowers Appeal
http://ifap.ed.gov/DefaultManagement/guide/CDRGuidePart4.html

All Uncorrected Data Adjustments and New Data Adjustments must be made through the eCDR Appeals application. Unless other instructions have been provided via an IFAP announcement, the Loan Servicing Appeal will continue to be submitted via hard copy. The Averaged Rates Appeal and Thirty-or-fewer Borrowers Appeal will continue to be submitted via hard copy. The eCDR Appeals application, as it is known, allows schools to electronically submit certain challenge/ adjustment requests during the specified timeframes and allows data managers (guaranty agency or Federal Loan Servicer) and Federal Student Aid (FSA) personnel to electronically view and respond to these challenge/adjustment requests. The application tracks the entire life cycle of each request from the time the case is submitted until the time a decision is made and the case is closed.

School users will now have access to a table listing all adjustments for which a data manager has requested additional information. This table will be included in the school's Current Status Report, available by selecting the Report tab.

It has come to FSA's attention that a number of schools are challenging data in the school's cohort default rate based on an incorrect understanding of the cohort default rate calculation. This results in an unnecessary increase in the workload for the schools, data managers, and FSA. The following are some scenarios that have been noted, along with an

explanation of why these allegations are considered invalid based on the current logic for the cohort default rate calculation.

1.School requests that borrower be removed from numerator as borrower defaulted, then paid the loan in full (either through consolidation or another method). Borrower will continue to be counted as a defaulted borrower for cohort default rate purposes. Current regulations only allow for a defaulted loan to be removed from default for cohort default rate purposes if the borrower successfully rehabilitated the loan within the cohort period, or, for FFELs held by a guaranty agency, if the lender repurchased the loan due to the claim being submitted or paid in error. See 34 CFR Sections 668.183(c)(2) and 668.202(c)(2).

2.School alleges that borrower be removed from numerator due to an incorrect date entered repayment that is resulting in the default date for the borrower being less than 360 days from the corrected date entered repayment. This allegation type applies to Direct Loans or loans that were PUT to the Department only, since FFELs held by a guaranty agency use the claim paid date as the default date, not the 360th day of delinquency. If a data manager agrees to correct the date entered repayment, they will update the default date to the 360th day of delinquency based on the new date entered repayment. However, if the updated date entered repayment and default date still fall within the cohort period, the borrower will continue to be counted in both the numerator/denominator. If the updated date entered repayment causes the updated default date to fall outside of the cohort period, borrower will be removed from the numerator only. If the updated date entered repayment falls outside of the cohort period, borrower will be removed from both the numerator/denominator.

3.Borrower is included in more than one cohort year. This may be correct, based upon the situation. If the borrower had a break in enrollment of greater than six months, then the borrower will enter repayment on the loans from the first period of enrollment six months and one day after the borrower's last date of attendance (LDA) or less than half-time date (LTHT), then will receive another six month grace period based on the LDA or LTHT date of the second period of enrollment. This may result in the borrower being included in more than one cohort year. If the borrower's break in enrollment was less than six months, this is considered continuous enrollment and the borrower should be in only one cohort year.

4.School was involved in a change of affiliation/merger and has borrowers counted more than once in the cohort default rate. A borrower may be counted more than once in the school's cohort default rate if the borrower had loans certified under two or more of the OPE-IDs that were involved in the change of affiliation/merger. Please see page 2.5-2 of the CDR Guide.

If a school has any questions regarding the cohort default rate calculation, Chapter 2.1 of the CDR Guide includes a thorough explanation of how the rates are calculated. Additionally, a school involved in a change of affiliation/merger should read Chapter 2.5 of the CDR Guide for an explanation of how the change of affiliation/merger will affect the cohort default rates of all of the schools involved.

WHAT TOOLS AND INFORMATION ARE AVAILABLE TO HELP MONITOR AND MANAGE MY SCHOOL'S COHORT DEFAULT RATE?

| Tools Information | Description | Contact Information |
|---|---|---|
| Cohort Default Rate Guide | http://www.ifap.ed.gov/DefaultManagement/finalcdrg.html. Reference tool designed by U.S. Dept of Education to help schools understand cohort default rates and various challenge/appeal/adjustment processes. The electronic electronic version was revised September 2013 and may be found online. | May be printed from CDR Guide Link |
| Default Prevention and Mgmt Website | http://ifap.ed.gov/DefaultManagement/DefaultManagement.html. Contains valuable information for schools, guaranty agencies and borrowers. Contains link for eCDR process, including enrollment procedures and downloading instructions. | Operations Performance Division 202-377-4259 |
| eCDR Appeals | Electronic Cohort Default Rate Appeals Process<br><br>eCDR Appeals facilitates the exchange of information between parties for three of the challenge/adjustment processes:Incorrect Data Challenge (IDC), Uncorrected Data Adjustments (UDA), and New Data Adjustments (NDA). The application allows schools to electronically submit these challenges and adjustment requests during a cohort default rate cycle, and allows data managers (guaranty agency or Direct Loan Servicer) and Federal Student Aid (FSA) personnel to electronically view and respond to challenges and adjustment requests. The application tracks the entire life cycle of each challenge/adjustment request from the time the case is submitted until the time a decision is made and the case is closed.<br><br>All users must complete the registration process to gain access to eCDR Appeals. The eCDR Appeals homepage contains a link to the Registration and User Account Guide, which gives step-by-step instructions for registration. Links to the User Guides for the three processes can also be found here, as well as a link to the Cohort Default Rate Guide. | Operations Performance Division 202-377-4259 |
| Late Stage | Process whereby schools work in collaboration | Direct Loan |

| | | |
|---|---|---|
| Delinquency Assistance (LSDA) | with servicers or guarantors to identify and provide counseling to borrowers more than 240 days late on loan repayment. For Direct Loan schools, the website https://www.myedaccount.com/ identifies borrowers whose impending default will impact the school's cohort default rate. | Servicer 888-877-7658 (can guide you through the process) |
| National Student Loan Data System (NLSDS) | https://www.nlsdsfap.ed.gov. Offers schools the opportunity to request reports in extract or preformatted formats that can be retrieved through the Students Aid Internet Gateway(SAIG) account associated with the NLSDS User Id that requested the report. Listed below are some reports NLSDS offers. | NLSDS Customer Service at (800) 999-8219 |

| Report name | Brief Description of the NLSDS Reports |
|---|---|
| DRC035 | School CDR Rate History Report provides school with a copy of the Loan Record Detail Report that lists students in default/repayment during the cohort period indicated. |
| SCHER1 | Enrollment Reporting Summary Report provides school users with the chronology of enrollment reporting events. |
| DER001 | Date Entered Repayment Report provides school users with a list of student borrowers with loan history who are scheduled to go into repayment during a specified date range. |
| DRC015 DRC016 | School Repayment Information Loan Detail provides school users with the current repayment status of certain borrowers in FFEL/DL loan programs who attended a school during a specific period. |
| SCH01B | Exit Counseling Report provides school users with exit counseling information on students who attended the requesting school and whose anticipated completion dates fall within a specified date range. |
| DELQ01 | The Delinquent Borrower Report (DELQ01) provides School users a report of borrowers who have been reported as delinquent in making loan payments to one of the federal loan servicers. |
| SCHPR1 | The School Portfolio Report (SCHPR1) provides ED users with with information about all Direct Loan and/or FFEL program loans for a specified school. |

Additional tools and information may be found in Chapter 3.2 of the Cohort Default Rate Guide, Monitoring Loan Repayment Status Year-Round, available at http://ifap.ed.gov/DefaultManagement/guide/CDRGuidePart3.html.

If you have any questions about this letter that are not answered in the Cohort Default Rate Guide, please contact Operations Performance Division via email at FSA.Schools.Default.Management@ed.gov or via phone at (202) 377-4259.

Please be sure to include your Office of Postsecondary Education Identification Number (OPE ID) on all correspondence, as shown on page one of this letter.

Sincerely,

Katrina Turner
Director
Operations Performance Management Services
Business Operations

OPEID: 002523

School Name: Westminster College
City and State: Fulton, MO 65251-1299

The Department's records indicate the following with regard to your school's loan program participation:

CERTIFIED FFEL CERTIFIED DIRECT LOAN

Based on borrower participation in the FFEL Program and/or Direct Loan Program at your school, here are the FY 2011, FY 2010 and FY 2009 official cohort default rates on record for your school:

Fiscal Year 2011
(1) Number of borrowers entering repayment: 207

(2) Number of borrowers who entered repayment and defaulted: 11
(3) Official Cohort Default Rate: 5.3%
(4) Rate Type: DU

Fiscal Year 2010
(1) Number of borrowers entering repayment: 191
(2) Number of borrowers who entered repayment and defaulted: 9

(3) Official Cohort Default Rate: 4.7%
(4) Rate Type: FL

Fiscal Year 2009
(1) Number of borrowers entering repayment: 166
(2) Number of borrowers who entered repayment and defaulted: 7

(3) Official Cohort Default Rate: 4.2%

(4) Rate Type: FL

The rate type indicates the category of loans that the Department included in your school's cohort default rate:
FL-FFEL Program loans only
DL-Direct Loan Program loans only
DU- both FFEL Program and Direct Loan Program loans

For additional information on the methodology that the Department uses to calculate cohort default rates, please refer to the Chapter 2.1 of the Cohort Default Rate Guide, How the Rates are Calculated, available at http://ifap.ed.gov/DefaultManagement/guide/CDRGuidePart2.html.

UNITED STATES DEPARTMENT OF EDUCATION
WASHINGTON, D.C. 20202
September 2013

Westminster College
501 Westminster Avenue
Fulton, MO 65251-1299
NL01

OPE ID: 002523
FY 2010 3-Year Cohort Default Rate: 8.9

RE: FY 2010 3-Year Official Cohort Default Rate Notification Letter

Dear President:

On October 28, 2009, the U.S. Department of Education (Department) published in the Federal Register the regulations enacted by the Higher Education Opportunity Act of 2009 that will govern the calculation of cohort default rates. Under the new provisions, an institution's Cohort Default Rate is calculated as the percentage of borrowers in the cohort who default before the end of the second fiscal year following the fiscal year in which the borrowers entered repayment. This extends the length of time in which a student can default from two to three years.

Beginning with the fiscal year (FY) 2009 cohort year, schools received both a two and three year cohort default rate. Schools will also receive a two and three year cohort default rate this year. It is important to note that this year is the last year that two year cohort default rates will be released. Next year in 2014, the FY 2011 3-Year cohort default rate will be the only cohort default rate released.

This letter officially notifies you of your school's fiscal year (FY) 2010 3-Year cohort default rate based on Federal Family Education Loan (FFEL) Program and/or William D. Ford Federal Direct Loan (Direct Loan) Program loans made to students for attendance at your school. Your school's FY 2010 3-Year cohort default rate is shown above. Please note that even if your school is no longer participating in the student loan program(s), federal law requires the Department to notify your school of its cohort default rate.

Since the Department is no longer mailing hardcopies of the cohort default rate notification letters to any schools, please refer to http://www.ed.gov/offices/OSFAP/defaultmanagement/ecdr.html for a description of the other files that the Department transmitted to you along with this letter.

WHAT FORMULA DID THE DEPARTMENT USE TO CALCULATE MY SCHOOL'S RATE?

The Department uses one of two methods for calculation of cohort default rates:

1.Official non-average rate for schools with 30 or more borrowers entering repayment,
2.Unofficial rate for schools with 29 or fewer borrowers entering repayment with less than three years of data.

For a complete explanation of the types of rates, please see Chapter 2.1 of the Cohort Default Rate Guide, How the Rates are Calculated, available at http://www.ifap.ed.gov/DefaultManagement/guide/CDRGuidePart2.html.

WHAT TYPES OF LOANS DID THE DEPARTMENT INCLUDE IN MY SCHOOL'S RATE CALCULATION?

The Department included three types of loans in your school's cohort default rate calculation:

1) Federal Stafford Subsidized and Federal Stafford Unsubsidized Loans

2) Federal Direct Subsidized and Federal Direct Unsubsidized Loans

3) Federal Supplemental Loans for Students (Federal SLS Loans). Although rare, it is possible for Federal SLS loans to be included in your school's cohort default rate calculation.

WHAT LOAN RECORD DETAIL REPORT (LRDR) ACCOMPANIES THIS NOTIFICATION LETTER?

Your school's FY 2010 3-Year official cohort default rate may be a non-averaged rate, or an Unofficial rate (less than 30 borrowers entering repayment). Accordingly, the LRDR that accompanies this letter reflects all loans that went into repayment during FY 2010 and defaulted by September 30, 2012.

Please note that if a technical problem caused by the Department results in an inability to access the data, schools have five business days from the receipt of the eCDR notification package to notify Operations Performance Division at the email address given below. All schools must meet the established submission timeframes for cohort default rate adjustments and appeals. The Department will not review adjustments and appeals that any school submits outside of the established timeframes.

For more information on how to read the loan record detail report, please refer to Chapter 2.3 of the Cohort Default Rate Guide, Reviewing the Loan Record Detail Report, available at http://www.ifap.ed.gov/DefaultManagement/guide/CDRGuidePart2.html

ARE THERE ANY SANCTIONS OR BENEFITS ASSOCIATED WITH MY RATE?

There will be no sanctions associated with your school's 3-year cohort default rate until three years of 3-Year cohort default rates have been collected. This means that the first year that a school will be subject to loss of eligibility is fiscal year 2011 which will be released in 2014.

However, if your school's FY 2010 3-Year cohort default rate is equal to or greater than 30 percent you must establish a default prevention task force that prepares a plan to identify the factors causing your cohort default rate to exceed 30 percent and submit to the Department for review.

WILL MY RATE BE CALCULATED THE SAME IF MY SCHOOL HAS MERGED WITH ANOTHER?

The FY 2010 3-Year cohort default rate for institutions involved in a merger or change of affiliation will be based on all borrowers from the parent and the underlying institutions which have borrowers that entered repayment in FY 2010 (October 1,2009 - September 30,2010).

WHAT RIGHTS DOES MY SCHOOL HAVE TO APPEAL THIS RATE INFORMATION?

Based on your school's FY 2010 three year cohort default rate, your school may be eligible to submit the following adjustments/appeals:

Uncorrected Data Adjustment
http://www.ifap.ed.gov/DefaultManagement/guide/CDRGuidePart4.html

Loan Servicing Appeal
http://www.ifap.ed.gov/DefaultManagement/guide/CDRGuidePart4.html

New Data Adjustment
http://www.ifap.ed.gov/DefaultManagement/guide/CDRGuidePart4.html

All Uncorrected Data Adjustments and New Data Adjustments must be made through the eCDR Appeals application. Unless other instructions have been provided via an IFAP announcement,the Loan Servicing Appeal will continue to be submitted via hard copy. The eCDR Appeals application, as it is known, allows schools to electronically submit certain challenge/ adjustment requests during the specified timeframes and allows data managers (guaranty agency or Federal Loan Servicer) and Federal Student Aid (FSA) personnel to electronically view and respond to these challenge/adjustment requests. The application tracks the entire life cycle of each request from the time the case is submitted until the time a decision is made and the case is closed.

It has come to FSA's attention that a number of schools are challenging data in the school's cohort default rate based on an incorrect understanding of the cohort default rate calculation. This results in an unnecessary increase in the workload for the schools, data managers, and FSA. The following are some scenarios that have been noted, along with an explanation of why these allegations are considered invalid based on the current logic for the cohort default rate calculation.

1.School requests that borrower be removed from numerator as borrower defaulted, then paid the loan in full (either through consolidation or another method). Borrower will continue to be counted as a defaulted borrower for cohort default rate purposes. Current regulations only allow for a defaulted loan to be removed from default for cohort default rate purposes if the borrower successfully rehabilitated the loan within the cohort period, or, for FFELs held by a guaranty agency, if the lender repurchased the loan due to the claim being submitted or paid in error. See 34 CFR Sections 668.183(c)(2) and 668.202(c)(2).

2.School alleges that borrower be removed from numerator due to an incorrect date entered repayment that is resulting in the default date for the borrower being less than 360 days from the corrected date entered repayment. This allegation type applies to Direct Loans or loans that were PUT to the Department only, since FFELs held by a guaranty agency use the claim paid date as the default date, not the 360th day of delinquency. If a data manager agrees to correct the date entered repayment, they will update the default date to the 360th day of delinquency based on the new date entered repayment. However, if the updated date entered repayment and default date still fall within the cohort period, the borrower will continue to be counted in both the numerator/denominator. If the updated

date entered repayment causes the updated default date to fall outside of the cohort period, borrower will be removed from the numerator only. If the updated date entered repayment falls outside of the cohort period, borrower will be removed from both the numerator/denominator.

3.Borrower is included in more than one cohort year. This may be correct, based upon the situation. If the borrower had a break in enrollment of greater than six months, then the borrower will enter repayment on the loans from the first period of enrollment six months and one day after the borrower's last date of attendance (LDA) or less than half-time date (LTHT), then will receive another six month grace period based on the LDA or LTHT date of the second period of enrollment. This may result in the borrower being included in more than one cohort year. If the borrower's break in enrollment was less than six months, this is considered continuous enrollment and the borrower should be in only one cohort year.

4.School was involved in a change of affiliation/merger and has borrowers counted more than once in the cohort default rate. A borrower may be counted more than once in the school's cohort default rate if the borrower had loans certified under two or more of the OPE-IDs that were involved in the change of affiliation/merger. Please see page 2.5-2 of the CDR Guide.

If a school has any questions regarding the cohort default rate calculation, Chapter 2.1 of the CDR Guide includes a thorough explanation of how the rates are calculated. Additionally, a school involved in a change of affiliation/merger should read Chapter 2.5 of the CDR Guide for an explanation of how the change of affiliation/merger will affect the cohort default rates of all of the schools involved.

WHAT TOOLS AND INFORMATION ARE AVAILABLE TO HELP MONITOR AND MANAGE MY SCHOOL'S COHORT DEFAULT RATE?

| Tools Information | Description | Contact Information |
|---|---|---|
| Cohort Default Rate Guide | http://www.ifap.ed.gov/DefaultManagement/finalcdrg.html. Reference tool designed by U.S. Dept of Education to help schools understand cohort default rates and various challenge/appeal/adjustment processes. The electronic version was revised September 2013 and may be found online. | May be printed from CDR Guide Link |
| Default Prevention and Mgmt Website | http://ifap.ed.gov/DefaultManagement/DefaultManagement.html. Contains valuable information for schools, guaranty agencies and borrowers. Contains link for eCDR process, including enrollment procedures and downloading instructions. | Operations Performance Division 202-377-4259 |
| eCDR Appeals | Electronic Cohort Default Rate Appeals Process<br><br>eCDR Appeals facilitates the exchange of information between parties for three of the challenge/adjustment processes:Incorrect Data Challenge (IDC), Uncorrected Data Adjustments | Operations Performance Division 202-377-4259 |

| | | |
|---|---|---|
| | (UDA), and New Data Adjustments (NDA). The application allows schools to electronically submit these challenges and adjustment requests during a cohort default rate cycle, and allows data managers (guaranty agency or Direct Loan Servicer) and Federal Student Aid (FSA) personnel to electronically view and respond to challenges and adjustment requests. The application tracks the entire life cycle of each challenge/adjustment request from the time the case is submitted until the time a decision is made and the case is closed.<br><br>All users must complete the registration process to gain access to eCDR Appeals. The eCDR Appeals homepage contains a link to the Registration and User Account Guide, which gives step-by-step instructions for registration. Links to the User Guides for the three processes can also be found here, as well as a link to the Cohort Default Rate Guide. | |
| Late Stage Delinquency Assistance (LSDA) | Process whereby schools work in collaboration with servicers or guarantors to identify and provide counseling to borrowers more than 240 days late on loan repayment. For Direct Loan schools, the website https://www.myedaccount.com/ identifies borrowers whose impending default will impact the school's cohort default rate. | Direct Loan Servicer 888-877-7658 (can guide you through the process) |
| National Student Loan Data System (NLSDS) | https://www.nlsdsfap.ed.gov. Offers schools the opportunity to request reports in extract or preformatted formats that can be retrieved through the Students Aid Internet Gateway(SAIG) account associated with the NLSDS User Id that requested the report. Listed below are some reports NLSDS offers. | NLSDS Customer Service at (800) 999-8219 |

| Report name | Brief Description of the NLSDS Reports |
|---|---|
| DRC035 | School CDR Rate History Report provides school with a copy of the Loan Record Detail Report that lists students in default/repayment during the cohort period indicated. |
| SCHER1 | Enrollment Reporting Summary Report provides school users with the chronology of enrollment reporting events. |
| DER001 | Date Entered Repayment Report provides school users with a list of student borrowers with loan history who are scheduled to go into repayment during a specified date range. |
| DRC015<br>DRC016 | School Repayment Information Loan Detail provides school users with the current repayment status of certain borrowers in FFEL/DL loan programs who attended a school during a specific period. |

| | |
|---|---|
| SCH01B | Exit Counseling Report provides school users with exit counseling information on students who attended the requesting school and whose anticipated completion dates fall within a specified date range. |
| DELQ01 | The Delinquent Borrower Report (DELQ01) provides School users a report of borrowers who have been reported as delinquent in making loan payments to one of the federal loan servicers. |
| SCHPR1 | The School Portfolio Report (SCHPR1) provides ED users with with information about all Direct Loan and/or FFEL program loans for a specified school. |

Additional tools and information may be found in Chapter 3.2 of the Cohort Default Rate Guide, Monitoring Loan Repayment Status Year-Round, available at http://ifap.ed.gov/DefaultManagement/guide/CDRGuidePart3.html.

If you have any questions about this letter that are not answered in the Cohort Default Rate Guide, please contact Operations Performance Division via email at FSA.Schools.Default.Management@ed.gov or via phone at (202) 377-4259.

Please be sure to include your Office of Postsecondary Education Identification Number (OPE ID) on all correspondence, as shown on page one of this letter.

Sincerely,

Katrina Turner
Director
Operations Performance Management Services
Business Operations

UNITED STATES DEPARTMENT OF EDUCATION
WASHINGTON, D.C. 20202
September 2011

Westminster College
501 Westminster Avenue
Fulton, MO 65251-1299
NL01

OPE ID: 002523
FY 2009 Cohort Default Rate: 4.2

RE: FY 2009 Official Cohort Default Rate Notification Letter

Dear President:

This letter officially notifies you of your school's fiscal year (FY) 2009 cohort default rate based on Federal Family Education Loan (FFEL) Program and/or William D. Ford Federal Direct Loan (Direct Loan) Program loans made to students for attendance at your school. Your school's FY 2009 cohort default rate is shown above. Please note that even if your school is no longer participating in the student loan program(s), federal law requires the U.S. Department of Education (Department) to notify your school of its cohort default rate.

Since the Department is no longer mailing hardcopies of the cohort default rate notification letters to any schools, please refer to http://www.ed.gov/offices/OSFAP/defaultmanagement/ecdr.html for a description of the other files that the Department transmitted to you along with this letter.

WHAT FORMULA DID THE DEPARTMENT USE TO CALCULATE MY SCHOOL'S RATE?

The Department uses one of three methods for calculation of cohort default rates:

1.Official non-average rate for schools with 30 or more borrowers entering repayment,
2.Official average rate for schools with 29 or fewer borrowers entering repayment, and
3.Unofficial rate for schools with 29 or fewer borrowers entering repayment with less than three years of data.

For complete explanation of the three types of rates, please see Chapter 2.1 of the Cohort Default Rate Guide, How the Rates are Calculated, available at http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart2.html.

WHAT TYPES OF LOANS DID THE DEPARTMENT INCLUDE IN MY SCHOOL'S RATE CALCULATION?

The Department included three types of loans in your school's cohort default rate calculation:

1) Federal Stafford Subsidized and Federal Stafford Unsubsidized Loans

2) Federal Direct Subsidized and Federal Direct Unsubsidized Loans

3) Federal Supplemental Loans for Students (Federal SLS Loans). Although rare, it is possible for Federal SLS loans to be included in your school's cohort default rate calculation.

WHAT LOAN RECORD DETAIL REPORT (LRDR) ACCOMPANIES THIS NOTIFICATION LETTER?

If your school's FY 2009 official cohort default rate is a non-averaged rate, the LRDR that accompanies this letter reflects all loans that went into repayment during FY 2009. If your school's FY 2009 official cohort default rate is an averaged rate, the LRDR that accompanies this letter reflects all loans that went into repayment during FY 2009, FY 2008 and FY 2007.

Please note that if a technical problem caused by the Department results in an inability to access the data, schools have five business days from the receipt of the eCDR notification package to notify Operations Performance Division at the email address given below. All schools must meet the established submission timeframes for cohort default rate adjustments and appeals. The Department will not review adjustments and appeals that any school submits outside of the established timeframes.

For more information on how to read the loan record detail report, please refer to Chapter 2.3 of the Cohort Default Rate Guide, Reviewing the Loan Record Detail Report, available at http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart2.html.

WHAT SANCTIONS AND BENEFITS APPLY TO MY SCHOOL BASED ON THIS RATE?

According to the Higher Education Act of 1965 (HEA), as amended, the Higher Education Reconciliation Act of 2005 (HERA), Pub.L.109-71 and the Department's regulations, your school is not subject to any sanctions based on your school's FY 2009 cohort default rate. However, if your school's official FY 2009 cohort default rate is 25.0 percent or greater, the Department may provisionally certify your school when your school applies for recertification to participate in the Federal Student Aid Programs. For more information about provisional certification, please refer to 34 C.F.R. Section 668.16(m)(1) and (2)(i) or contact the School Participation Management Division at 202-377-3173.

If your school's most recent official cohort default rate is less than 5.0 percent and your school is an eligible home institution that certifies/originates a loan to cover the cost of attendance in a study abroad program, your school is eligible for this benefit. Your school may disburse/deliver loan proceeds in a single installment and may choose to release loan proceeds to first-year, first-time borrowers prior to 30 calendar days after the first day of the borrower's program of study. Once your school receives notice from the Department that your school's official cohort default rate is 5.0 percent or greater, this benefit will end within

30 calendar days of the notification.

Beginning October 1, 2011 an institution with a cohort default rate of less than 15 percent for each of the three most recent fiscal years for which data are available, including eligible foreign institutions, may disburse, in a single installment, loans that are made for one semester, one trimester, one quarter, or a four-month period. Such an institution is also no longer required to delay the delivery or disbursement of the first disbursement of a loan for 30 days for first-time, first-year undergraduate borrowers.

Once your school receives notice from the Department that your school's official cohort default rate is 15.0 percent or greater, this benefit will end within 30 calendar days of the notification.

For more information on the sanctions and the benefits associated with official cohort default rates, please refer to Chapter 2.4 of the Cohort Default Rate Guide, Cohort Default Rate Effects, available at http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart2.html.

WHY DOES THIS LETTER SAY THAT MY SCHOOL IS NOT SUBJECT TO SANCTIONS BUT MY RATES EXCEED THE SANCTION THRESHOLD?

If your school has official FY 2009, FY 2008, and FY 2007 cohort default rates that are 25.0 percent or greater or your school has an official FY 2009 cohort default rate that is greater than 40.0 percent, your school is NOT subject to the loss of FFEL Program, Direct Loan Program, and/or Federal Pell Grant Program eligibility because your school met one or more of the following criteria:

| FY 2009, FY 2008, FY 2007 Cohort Default Rates >= 25.0% | FY 2009 Cohort Default Rate > 40.0% |
|---|---|
| At least two of your schools three most recent cohort default rates are official average cohort default rates and would be less than 25.0 percent if the Department had calculated the rate using the data for that cohort fiscal year alone. | Your schools FY 2009 cohort default rate is an official averaged cohort default rate. |
| Thirty or fewer borrowers entered into repayment during your schools three most recent official cohort default rates. | |
| Your school submitted a successful participation rate index challenge/appeal based on your schools draft FY 2009 cohort default rate, official FY 2008 cohort default rate, or official FY 2007 cohort default rate. | |
| Your school entered into a settlement agreement with the U.S. Department of Education that supersedes any sanctions the Department would apply based on cohort default rate calculations. | |

WHAT RIGHTS DOES MY SCHOOL HAVE TO APPEAL THIS RATE INFORMATION?

Based on your school's FY 2009 cohort default rate, your school may be eligible to submit the following adjustments/appeals:

Uncorrected Data Adjustment
http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart4.html

Loan Servicing Appeal
http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart4.html

New Data Adjustment
http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart4.html

Averaged Rates Appeal
http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart4.html

Thirty-or-fewer Borrowers Appeal
http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart4.html

Beginning this year with the FY 2009 Official cycle all Uncorrected Data Adjustments and New Data Adjustments must be made through the eCDR Appeals application. The Loan Servicing Appeal, Averaged Rates Appeal and Thirty-or-fewer Borrowers Appeal will continue to be submitted via hard copy. The eCDR Appeals application, as it is known, allows schools to electronically submit certain challenge/ adjustment requests during the specified timeframes and allows data managers (guaranty agency or Federal Loan Servicer) and Federal Student Aid (FSA) personnel to electronically view and respond to these challenge/adjustment requests. The application tracks the entire life cycle of each request from the time the case is submitted until the time a decision is made and the case is closed.

With this release of eCDR Appeals (Release 4.0), school users will now have access to a table listing all adjustments for which a data manager has requested additional information. This table will be included in the school's Current Status Report, available by selecting the Report tab.

WHAT TOOLS AND INFORMATION ARE AVAILABLE TO HELP MONITOR AND MANAGE MY SCHOOL'S COHORT DEFAULT RATE?

| Tools Information | Description | Contact Information |
|---|---|---|
| Cohort Default Rate Guide | http://www.ifap.ed.gov/DefaultManagement/finalcdrg.html. Reference tool designed by U.S. Dept of Education to help schools understand cohort default rates and various challenge/ appeal/adjustment processes. Original hardcopy mailed with FY 1999 notification letter. The electronic version was revised August 2006 and may be found online. | May be printed from CDR Guide Link |

| | | |
|---|---|---|
| Cohort Default Rate Guide Quick Reference | The Cohort Default Rate Guide Quick reference at http://ifap.ed.gov/drmaterials/attachments/CDRGQuickRef093005FINAL.pdf presents some of the key elements of the Guide in a more informal manner to give schools a summary of what they should do during the draft and official cohort default rate cycles. | May be printed from CDR Reference Link |
| Default Prevention and Mgmt Website | http://ifap.ed.gov/DefaultManagement/DefaultManagement.html. Contains valuable information for schools, guaranty agencies and borrowers. Contains link for eCDR process, including enrollment procedures and downloading instructions. | Default Prevention and Management 202-377-4259 |
| eCDR Appeals | Electronic Cohort Default Rate Appeals Process<br><br>eCDR Appeals facilitates the exchange of information between parties for three of the challenge/adjustment processes:Incorrect Data Challenge (IDC), Uncorrected Data Adjustments (UDA), and New Data Adjustments (NDA). The application allows schools to electronically submit these challenges and adjustment requests during a cohort default rate cycle, and allows data managers (guaranty agency or Direct Loan Servicer) and Federal Student Aid (FSA) personnel to electronically view and respond to challenges and adjustment requests. The application tracks the entire life cycle of each challenge/adjustment request from the time the case is submitted until the time a decision is made and the case is closed.<br><br>All users must complete the registration process to gain access to eCDR Appeals. The eCDR Appeals homepage contains a link to the Registration and User Account Guide, which gives step-by-step instructions for registration. Links to the User Guides for the three processes can also be found here, as well as a link to the Cohort Default Rate Guide. | Default Prevention and Management 202-377-4259 |
| Late Stage Delinquency Assistance (LSDA) | Process whereby schools work in collaboration with servicers or guarantors to identify and provide counseling to borrowers more than 240 days late on loan repayment. For Direct Loan schools, the website http://www.dlservicer.ed.gov/ identifies borrowers whose impending default will impact the school's cohort default rate. | Direct Loan Servicer 888-877-7658 (can guide you through the process) |
| National | https://www.nlsdsfap.ed.gov. Offers schools the | NLSDS |

| | | |
|---|---|---|
| Student Loan Data System (NLSDS) | opportunity to request reports in extract or preformatted formats that can be retrieved through the Students Aid Internet Gateway(SAIG) account associated with the NLSDS User Id that requested the report. Listed below are some reports NLSDS offers. | Customer Service at (800) 999-8219 |

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| DRC015 DRC016 | School Repayment Information Loan Detail provides school users with the current repayment status of certain borrowers in FFEL/DL loan programs who attended a school during a specific period. |
| SCH01B | Exit Counseling Report provides school users with exit counseling information on students who attended the requesting school and whose anticipated completion dates fall within a specified date range. |
| DELQ01 | The Delinquent Borrower Report (DELQ01) provides School users a report of borrowers who have been reported as delinquent in making loan payments to one of the federal loan servicers. |
| SCHPR1 | The School Portfolio Report (SCHPR1) provides ED users with with information about all Direct Loan and/or FFEL program loans for a specified school. |

Additional tools and information may be found in Chapter 3.2 of the Cohort Default Rate Guide, Monitoring Loan Repayment Status Year-Round, available at http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart3.html.

If you have any questions about this letter that are not answered in the Cohort Default Rate Guide, please contact Operations Performance Division via email at FSA.Schools.Default.Management@ed.gov or via phone at (202) 377-4259.

Please be sure to include your Office of Postsecondary Education Identification Number (OPE ID) on all correspondence, as shown on page one of this letter.

Sincerely,

Katrina Turner
Director
Operations Performance Division
Business Operations

Enclosures

Note: The Higher Education Opportunity Act (HEOA) enacted on August 8, 2008 made a number of changes to the Federal Student Aid Programs including timeframes for the calculations of FFEL/DL Cohort Default Rates. On October 28, 2009, the Department published in the Federal Register the regulations that will govern the calculation of default rates beginning with the FY 2009 cohort year. Under the new provisions, an institution's Cohort Default Rate is calculated as the percentage of borrowers in the cohort who default before the end of the second fiscal year following the fiscal year in which the borrowers entered repayment.

The Department will issue the FY 2009 draft 3-Year cohort default in 2012. The standard 2-Year CDR will continue to be published along with the 3-Year rates until 2013. Beginning with the FY 2011 cohort default rate in September 2014, 3 Year rates will be the only official rate and schools will be subject to benefits and sanctions based solely on these rates.

A trial sample of 3 Year cohort default rates was sent to institutions in February 2011 so that they could begin to consider what impact this additional cohort year might have on their default rates. Schools may want to increase their default rate initiatives in order to maintain cohort default rates within benefit range and avoid sanction criteria.

More information on 3-Year cohort default rates will be forthcoming.

OPEID: 002523
School Name: Westminster College
City and State: Fulton, MO 65251-1299

The Department's records indicate the following with regard to your school's loan program participation:

CERTIFIED FFEL CERTIFIED DIRECT LOAN

Based on borrower participation in the FFEL Program and/or Direct Loan Program at your school, here are the FY 2009, FY 2008 and FY 2007 official cohort default rates on record for your school:

Fiscal Year 2009
(1) Number of borrowers entering repayment: 166
(2) Number of borrowers who entered repayment and defaulted: 7
(3) Official Cohort Default Rate: 4.2%
(4) Rate Type: FL

Fiscal Year 2008
(1) Number of borrowers entering repayment: 131
(2) Number of borrowers who entered repayment and defaulted: 5
(3) Official Cohort Default Rate: 3.8%
(4) Rate Type: FL

Fiscal Year 2007
(1) Number of borrowers entering repayment: 134
(2) Number of borrowers who entered repayment and defaulted: 5
(3) Official Cohort Default Rate: 3.7%
(4) Rate Type: FL

The rate type indicates the category of loans that the Department included in your school's cohort default rate:
FL-FFEL Program loans only
DL-Direct Loan Program loans only
DU- both FFEL Program and Direct Loan Program loans

For additional information on the methodology that the Department uses to calculate cohort default rates, please refer to the Chapter 2.1 of the Cohort Default Rate Guide, How the Rates are Calculated, available at http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart2.html.

FEDERAL STUDENT AID START HERE. GO FURTHER.

**UNITED STATES DEPARTMENT OF EDUCATION**

**FEDERAL STUDENT AID**
**SCHOOL ELIGIBILITY CHANNEL**

# PROGRAM PARTICIPATION AGREEMENT

| | |
|---|---|
| Effective Date of Approval: | The date on which this Agreement is signed on behalf of the Secretary of Education |
| Approval Expiration Date: | **December 31, 2016** |
| Reapplication Date: | **September 30, 2016** |

Name of Institution: **Westminster College**

Address of Institution: **501 Westminster Avenue**
**Fulton, MO 65251-1299**

OPE ID Number: **00252300**
DUNS Number: **080019433**
Taxpayer Identification Number (TIN): **430652617**

**The execution of this Agreement by the Institution and the Secretary is a prerequisite to the Institution's initial or continued participation in any Title IV, HEA Program.**

The postsecondary educational institution listed above, referred to hereafter as the "Institution," and the United States Secretary of Education, referred to hereafter as the "Secretary," agree that the Institution may participate in those student financial assistance programs authorized by Title IV of the Higher Education Act of 1965, as amended (Title IV, HEA Programs) indicated under this Agreement and further agrees that such participation is subject to the terms and conditions set forth in this Agreement. As used in this Agreement, the term "Department" refers to the U.S. Department of Education.

## SCOPE OF COVERAGE

This Agreement applies to all locations of the Institution as stated on the most current ELIGIBILITY AND CERTIFICATION APPROVAL REPORT issued by the Department. This Agreement covers the Institution's eligibility to participate in each of the following listed Title IV, HEA programs, and incorporates by reference the regulations cited.

- **FEDERAL PELL GRANT PROGRAM,** 20 U.S.C. §§ 1070a *et seq.*; 34 C.F.R. Part 690.
- **FEDERAL FAMILY EDUCATION LOAN PROGRAM,** 20 U.S.C. §§ 1071 *et seq.*; 34 C.F.R. Part 682.
- **FEDERAL DIRECT STUDENT LOAN PROGRAM,** 20 U.S.C. §§ 1087a *et seq.*; 34 C.F.R. Part 685.
- **FEDERAL PERKINS LOAN PROGRAM,** 20 U.S.C. §§ 1087aa *et seq.*; 34 C.F.R. Part 674.
- **FEDERAL SUPPLEMENTAL EDUCATIONAL OPPORTUNITY GRANT PROGRAM,** 20 U.S.C. §§ 1070b *et seq.*; 34 C.F.R. Part 676.
- **FEDERAL WORK-STUDY PROGRAM,** 42 U.S.C. §§ 2751 *et seq.*; 34 C.F.R. Part 675.
- **ACADEMIC COMPETITIVENESS GRANT AND NATIONAL SCIENCE AND MATHEMATICS ACCESS TO RETAIN TALENT GRANT PROGRAMS,** 20 U.S.C. §§ 1070a-1 *et seq.*; 34 C.F.R. Part 691.
- **TEACHER EDUCATION ASSISTANCE FOR COLLEGE AND HIGHER EDUATION GRANT PROGRAM,** 20 U.S.C. §§ 1070g *et seq.*; 34 C.F.R. Part 686.
- **IRAQ AND AFGHANISTAN SERVICE GRANT,** 20 U.S.C. §§ 1070d *et seq.*

# GENERAL TERMS AND CONDITIONS

1. The Institution understands and agrees that it is subject to and will comply with the program statutes and implementing regulations for institutional eligibility as set forth in 34 C.F.R. Part 600 and for each Title IV, HEA program in which it participates, as well as the general provisions set forth in Part F and Part G of Title IV of the HEA, and the Student Assistance General Provisions regulations set forth in 34 C.F.R. Part 668.
***The recitation of any portion of the statute or regulations in this Agreement does not limit the Institution's obligation to comply with other applicable statutes and regulations.***

2. a. The Institution certifies that on the date it signs this Agreement, it has a drug abuse prevention program in operation that it has determined is accessible to any officer, employee, or student at the Institution.
   b. The Institution certifies that on the date it signs this Agreement, it is in compliance with the disclosure requirements of Section 485(f) of the HEA (Campus Security Policy and Campus Crime Statistics).

3. The Institution agrees to comply with --

   a. Title VI of the Civil Rights Act of 1964, as amended, and the implementing regulations, 34 C.F.R. Parts 100 and 101 (barring discrimination on the basis of race, color or national origin);
   b. Title IX of the Education Amendments of 1972 and the implementing regulations, 34 C.F.R. Part 106 (barring discrimination on the basis of sex);
   c. The Family Educational Rights and Privacy Act of 1974 and the implementing regulations, 34 C.F.R. Part 99;
   d. Section 504 of the Rehabilitation Act of 1973 and the implementing regulations, 34

C.F.R. Part 104 (barring discrimination on the basis of physical handicap); and

e. The Age Discrimination Act of 1975 and the implementing regulations, 34 C.F.R. Part 110.
f. The Standards for Safeguarding Customer Information, 16 C.F.R. Part 314, issued by the Federal Trade Commission (FTC), as required by the Gramm-Leach-Bliley (GLB) Act, P.L. 106-102. These Standards are intended to ensure the security and confidentiality of customer records and information. The Secretary considers any breach to the security of student records and information as a demonstration of a potential lack of administrative capability as stated in 34 C.F.R. 668.16(c). Institutions are strongly encouraged to inform its students and the Department of any such breaches.

4. The Institution acknowledges that 34 C.F.R. Parts 602 and 667 require accrediting agencies, State regulatory bodies, and the Secretary to share information about institutions. The Institution agrees that the Secretary, any accrediting agency recognized by the Secretary, and any State regulatory body may share or report information to one another about the Institution without limitation.
5. The Institution acknowledges that the HEA prohibits the Secretary from recognizing the accreditation of any institution of higher education unless that institution agrees to submit any dispute involving the final denial, withdrawal, or termination of accreditation to initial arbitration prior to any other legal action.

## SELECTED PROVISIONS FROM GENERAL PROVISIONS REGULATIONS, 34 C.F.R. PART 668.14

An institution's program participation agreement applies to each branch campus and other location of the institution that meets the applicable requirements of this part unless otherwise specified by the Secretary.

(b) By entering into a program participation agreement, an institution agrees that--

(1) It will comply with all statutory provisions of or applicable to Title IV of the HEA, all applicable regulatory provisions prescribed under that statutory authority, and all applicable special arrangements, agreements, and limitations entered into under the authority of statutes applicable to Title IV of the HEA, including the requirement that the institution will use funds it receives under any Title IV, HEA program and any interest or other earnings thereon, solely for the purposes specified in and in accordance with that program;

(2) As a fiduciary responsible for administering Federal funds, if the institution is permitted to request funds under a Title IV, HEA program advance payment method, the institution will time its requests for funds under the program to meet the institution's immediate Title IV, HEA program needs;

(3) It will not request from or charge any student a fee for processing or handling any application, form, or data required to determine a student's eligibility for, and amount of, Title IV, HEA program assistance;

(4) It will establish and maintain such administrative and fiscal procedures and records as may be necessary to ensure proper and efficient administration of funds received from the Secretary or from students under the Title IV, HEA programs, together with assurances that the institution will provide, upon request and in a timely manner, information relating to the administrative capability and financial responsibility of the institution to--

(i) The Secretary;

(ii) A guaranty agency, as defined in 34 CFR part 682, that guarantees loans made under the Federal Stafford Loan and Federal PLUS programs for attendance at the institution or any of the

institution's branch campuses or other locations;

(iii) The nationally recognized accrediting agency that accredits or preaccredits the institution or any of the institution's branch campuses, other locations, or educational programs;

(iv) The State agency that legally authorizes the institution and any branch campus or other location of the institution to provide postsecondary education; and

(v) In the case of a public postsecondary vocational educational institution that is approved by a State agency recognized for the approval of public postsecondary vocational education, that State agency;

(5) It will comply with the provisions of § 668.15 relating to factors of financial responsibility;

(6) It will comply with the provisions of § 668.16 relating to standards of administrative capability;

(7) It will submit reports to the Secretary and, in the case of an institution participating in the Federal Stafford Loan, Federal PLUS, or the Federal Perkins Loan Program, to holders of loans made to the institution's students under that program at such times and containing such information as the Secretary may reasonably require to carry out the purpose of the Title IV, HEA programs;

(8) It will not provide any statement to any student or certification to any lender in the case of an FFEL Program loan, or origination record to the Secretary in the case of a Direct Loan Program loan that qualifies the student or parent for a loan or loans in excess of the amount that the student or parent is eligible to borrow in accordance with sections 425(a), 428(a)(2), 428(b)(1)(A) and (B), 428B, 428H and 455(a) of the HEA;

(9) It will comply with the requirements of Subpart D of this part concerning institutional and financial assistance information for students and prospective students;

(10) In the case of an institution that advertises job placement rates as a means of attracting students to enroll in the institution, it will make available to prospective students, at or before the time that those students apply for enrollment--

(i) The most recent available data concerning employment statistics, graduation statistics, and any other information necessary to substantiate the truthfulness of the advertisements; and

(ii) Relevant State licensing requirements of the State in which the institution is located for any job for which an educational program offered by the institution is designed to prepare those prospective students;

(11) In the case of an institution participating in the FFEL Program, the institution will inform all eligible borrowers, as defined in 34 CFR part 682, enrolled in the institution about the availability and eligibility of those borrowers for State grant assistance from the State in which the institution is located, and will inform borrowers from another State of the source for further information concerning State grant assistance from that State;

(12) It will provide the certifications described in paragraph (c) of this section;

(13) In the case of an institution whose students receive financial assistance pursuant to section 484(d) of the HEA, the institution will make available to those students a program proven successful in assisting students in obtaining the recognized equivalent of a high school diploma;

(14) It will not deny any form of Federal financial aid to any eligible student solely on the grounds that the student is participating in a program of study abroad approved for credit by the institution;

(15) (i) Except as provided under paragraph (b)(15)(ii) of this section, the institution will use a default management plan approved by the Secretary with regard to its administration of the FFEL or Direct Loan programs, or both for at least the first two years of its participation in those programs, if the institution--

(A) Is participating in the FFEL or Direct Loan programs for the first time; or

(B) Is an institution that has undergone a change of ownership that results in a change in control

and is participating in the FFEL or Direct Loan programs.

(ii) The institution does not have to use an approved default management plan if --

(A) The institution, including its main campus and any branch campus, does not have a cohort default rate in excess of 10 percent; and

(B) The owner of the institution does not own and has not owned any other institution that had a cohort default rate in excess of 10 percent while that owner owned the institution.

(16) For a proprietary institution, the institution will derive at least 10 percent of its revenues for each fiscal year from sources other than Title IV, HEA program funds, as provided in § 668.28 (a) and (b), or be subject to sanctions described in § 668.28(c);

(17) The Secretary, guaranty agencies and lenders as defined in 34 CFR part 682, nationally recognized accrediting agencies, the Secretary of Veterans Affairs, State agencies recognized under 34 CFR part 603 for the approval of public postsecondary vocational education, and State agencies that legally authorize institutions and branch campuses or other locations of institutions to provide postsecondary education, have the authority to share with each other any information pertaining to the institution's eligibility for or participation in the Title IV, HEA programs or any information on fraud and abuse;

(18) It will not knowingly --

(i) Employ in a capacity that involves the administration of the Title IV, HEA programs or the receipt of funds under those programs, an individual who has been convicted of, or has pled *nolo contendere* or guilty to, a crime involving the acquisition, use, or expenditure of Federal, State, or local government funds, or has been administratively or judicially determined to have committed fraud or any other material violation of law involving Federal, State, or local government funds;

(ii) Contract with an institution or third-party servicer that has been terminated under section 432 of the HEA for a reason involving the acquisition, use, or expenditure of Federal, State, or local government funds, or that has been administratively or judicially determined to have committed fraud or any other material violation of law involving Federal, State, or local government funds; or

(iii) Contract with or employ any individual, agency, or organization that has been, or whose officers or employees have been--

(A) Convicted of, or pled *nolo contendere* or guilty to, a crime involving the acquisition, use, or expenditure of Federal, State, or local government funds; or

(B) Administratively or judicially determined to have committed fraud or any other material violation of law involving Federal, State, or local government funds;

(19) It will complete, in a timely manner and to the satisfaction of the Secretary, surveys conducted as a part of the Integrated Postsecondary Education Data System (IPEDS) or any other Federal collection effort, as designated by the Secretary, regarding data on postsecondary institutions;

(20) In the case of an institution that is co-educational and has an intercollegiate athletic program, it will comply with the provisions of § 668.48;

(21) It will not impose any penalty, including, but not limited to, the assessment of late fees, the denial of access to classes, libraries, or other institutional facilities, or the requirement that the student borrow additional funds for which interest or other charges are assessed, on any student because of the student's inability to meet his or her financial obligations to the institution as a result of the delayed disbursement of the proceeds of a Title IV, HEA program loan due to compliance with statutory and regulatory requirements of or applicable to the Title IV, HEA programs, or delays attributable to the institution;

(22)(i) It will not provide any commission, bonus, or other incentive payment based directly or indirectly upon success in securing enrollments or financial aid to any person or entity engaged

in any student recruiting or admission activities or in making decisions regarding the awarding of Title IV, HEA program funds, except that this limitation does not apply to the recruitment of foreign students residing in foreign countries who are not eligible to receive Title IV, HEA program funds.

(ii) Activities and arrangements that an institution may carry out without violating the provisions of (b)(22)(i) of this section include, but are not limited to:

(A) The payment of fixed compensation, such as a fixed annual salary or a fixed hourly wage, as long as that compensation is not adjusted up or down more than twice during any twelve month period, and any adjustment is not based solely on the number of students recruited, admitted, enrolled, or awarded financial aid. For this purpose, an increase in fixed compensation resulting from a cost of living increase that is paid to all or substantially all full-time employees is not considered an adjustment.

(B) Compensation to recruiters based upon their recruitment of students who enroll only in programs that are not eligible for Title IV, HEA program funds.

(C) Compensation to recruiters who arrange contracts between the institution and an employer under which the employer's employees enroll in the institution, and the employer pays, directly or by reimbursement, 50 percent or more of the tuition and fees charged to its employees; provided that the compensation is not based upon the number of employees who enroll in the institution, or the revenue they generate, and the recruiters have no contact with the employees.

(D) Compensation paid as part of a profit-sharing or bonus plan, as long as those payments are substantially the same amount or the same percentage of salary or wages, and made to all or substantially all of the institution's full-time professional and administrative staff. Such payments can be limited to all, or substantially all of the full-time employees at one or more organizational level at the institution, except that an organizational level may not consist predominantly of recruiters, admissions staff, or financial aid staff.

(E) Compensation that is based upon students successfully completing their educational programs, or one academic year of their educational programs, whichever is shorter. For this purpose, successful completion of an academic year means that the student has earned at least 24 semester or trimester credit hours or 36 quarter credit hours, or has successfully completed at least 900 clock hours of instruction at the institution.

(F) Compensation paid to employees who perform clerical "pre-enrollment" activities, such as answering telephone calls, referring inquiries, or distributing institutional materials.

(G) Compensation to managerial or supervisory employees who do not directly manage or supervise employees who are directly involved in recruiting or admissions activities, or the awarding of Title IV, HEA program funds.

(H) The awarding of token gifts to the institution's students or alumni, provided that the gifts are not in the form of money, no more than one gift is provided annually to an individual, and the cost of the gift is not more than $100.

(I) Profit distributions proportionately based upon an individual's ownership interest in the institution.

(J) Compensation paid for Internet-based recruitment and admission activities that provide information about the institution to prospective students, refer prospective students to the institution, or permit prospective students to apply for admission on-line.

(K) Payments to third parties, including tuition sharing arrangements, that deliver various services to the institution, provided that none of the services involve recruiting or admission activities, or the awarding of Title IV, HEA program funds.

(L) Payments to third parties, including tuition sharing arrangements, that deliver various services to the institution, even if one of the services involves recruiting or admission activities or the awarding of Title IV, HEA program funds, provided that the individuals performing the recruitment or admission activities, or the awarding of Title IV, HEA program funds, are not

compensated in a manner that would be impermissible under paragraph (b)(22) of this section.

(23) It will meet the requirements established pursuant to Part H of Title IV of the HEA by the Secretary and nationally recognized accrediting agencies;

(24) It will comply with the requirements of § 668.22;

(25) It is liable for all--

(i) Improperly spent or unspent funds received under the Title IV, HEA programs, including any funds administered by a third-party servicer; and

(ii) Returns any title IV, HEA program funds that the institution or its servicer may be required to make;

(26) If the stated objectives of an educational program of the institution are to prepare a student for gainful employment in a recognized occupation, the institution will--

(i) Demonstrate a reasonable relationship between the length of the program and entry level requirements for the recognized occupation for which the program prepares the student. The Secretary considers the relationship to be reasonable if the number of clock hours provided in the program does not exceed by more than 50 percent the minimum number of clock hours required for training in the recognized occupation for which the program prepares the student, as established by the State in which the program is offered, if the State has established such a requirement, or as established by any Federal agency; and

(ii) Establish the need for the training for the student to obtain employment in the recognized occupation for which the program prepares the student.

(27) In the case of an institution participating in a Title IV, HEA loan program, the institution --

(i) Will develop, publish, administer, and enforce a code of conduct with respect to loans made, insured or guaranteed under the Title IV, HEA loan programs in accordance with 34 CFR 601.21; and

(ii) Must inform its officers, employees, and agents with responsibilities with respect to loans made, insured or guaranteed under the Title IV, HEA loan programs annually of the provisions of the code required under paragraph (b)(27) of this section;

(28) For any year in which the institution has a preferred lender arrangement (as defined in 34 CFR 601.2(b)), it will at least annually compile, maintain, and make available for students attending the institution, and the families of such students, a list in print or other medium, of the specific lenders for loans made, insured, or guaranteed under Title IV, of the HEA or private education loans that the institution recommends, promotes, or endorses in accordance with such preferred lender arrangement. In making such a list, the institution must comply with the requirements in 34 CFR 682.212(h) and 34 CFR 601.10;

(29) (i) It will, upon the request of an enrolled or admitted student who is an applicant for a private education loan (as defined in 34 CFR part 601.2(b)), provide to the applicant the self-certification form required under 34 CFR 601.11(d) and the information required to complete the form, to the extent the institution possesses such information, including --

(A) The applicant's cost of attendance at the institution, as determined by the institution under part F of Title IV, of the HEA;

(B) The applicant's estimated financial assistance, including amounts of financial assistance used to replace the expected family contribution as determined by the institution in accordance with Title IV, for students who have completed the Free Application for Federal Student Aid; and

(C) The difference between the amounts under paragraphs (b)(29)(i)(A) and (29)(i)(B) of this section, as applicable.

(ii) It will, upon the request of the applicant, discuss with the applicant the availability of Federal, State, and institutional student financial aid;

(30) The institution --

distribution of copyrighted material by users of the institution's network, without unduly interfering with educational and research use of the network, that include --

(A) The use of one or more technology-based deterrents;

(B) Mechanisms for educating and informing its community about appropriate versus inappropriate use of copyrighted material, including that described in § 668.43(a)(10);

(C) Procedures for handling unauthorized distribution of copyrighted material, including disciplinary procedures; and

(D) Procedures for periodically reviewing the effectiveness of the plans to combat the unauthorized distribution of copyrighted materials by users of the institution's network using relevant assessment criteria. No particular technology measures are favored or required for inclusion in an institution's plans, and each institution retains the authority to determine what its particular plans for compliance with paragraph (b)(30) of this section will be, including those that prohibit content monitoring; and

(ii) Will, in consultation with the chief technology officer or other designated officer of the institution--

(A) Periodically review the legal alternatives for downloading or otherwise acquiring copyrighted material;

(B) Make available the results of the review in paragraph (b)(30)(ii)(A) of this section to its students through a Web site or other means; and

(C) To the extent practicable, offer legal alternatives for downloading or otherwise acquiring copyrighted material, as determined by the institution; and

(31) The institution will submit a teach-out plan to its accrediting agency in compliance with 34 CFR 602.24(c), and the standards of the institution's accrediting agency upon the occurrence of any of the following events:

(i) The Secretary initiates the limitation, suspension, or termination of the participation of an institution in any Title IV, HEA program under 34 CFR 600.41 or subpart G of this part or initiates an emergency action under § 668.83.

(ii) The institution's accrediting agency acts to withdraw, terminate, or suspend the accreditation or preaccreditation of the institution.

(iii) The institution's State licensing or authorizing agency revokes the institution's license or legal authorization to provide an educational program.

(iv) The institution intends to close a location that provides 100 percent of at least one program.

(v) The institution otherwise intends to cease operations.

(c) In order to participate in any Title IV, HEA program (other than the LEAP and NEISP programs), the institution must certify that it--

(1) Has in operation a drug abuse prevention program that the institution has determined to be accessible to any officer, employee, or student at the institution; and

(2)(i) Has established a campus security policy in accordance with section 485(f) of the HEA; and

(ii) Has complied with the disclosure requirements of § 668.47 as required by section 485(f) of the HEA.

(d)(1) The institution, if located in a State to which section 4(b) of the National Voter Registration Act (42 U.S.C. 1973gg-2(b)) does not apply, will make a good faith effort to distribute a mail voter registration form, requested and received from the State, to each student enrolled in a degree or certificate program and physically in attendance at the institution, and to make those forms widely available to students at the institution.

(2) The institution must request the forms from the State 120 days prior to the deadline for registering to vote within the State. If an institution has not received a sufficient quantity of

forms to fulfill this section from the State within 60 days prior to the deadline for registering to vote in the State, the institution is not liable for not meeting the requirements of this section during that election year.

(3) This paragraph applies to elections as defined in Section 301(1) of the Federal Election Campaign Act of 1971 (2 U.S.C. 431(1)), and includes the election for Governor or other chief executive within such State.

(e)(1) A program participation agreement becomes effective on the date that the Secretary signs the agreement.

(2) A new program participation agreement supersedes any prior program participation agreement between the Secretary and the institution.

(f)(1) Except as provided in paragraphs (g) and (h) of this section, the Secretary terminates a program participation agreement through the proceedings in subpart G of this part.

(2) An institution may terminate a program participation agreement.

(3) If the Secretary or the institution terminates a program participation agreement under paragraph (f) of this section, the Secretary establishes the termination date.

(g) An institution's program participation agreement automatically expires on the date that--

(l) The institution changes ownership that results in a change in control as determined by the Secretary under 34 CFR part 600; or

(2) The institution's participation ends under the provisions of § 668.26(a)(1), (2), (4), or (7).

(h) An institution's program participation agreement no longer applies to or covers a location of the institution as of the date on which that location ceases to be a part of the participating institution.

## WILLIAM D. FORD FEDERAL DIRECT LOAN PROGRAM

If an institution participates in the William D. Ford Federal Direct Loan (Direct Loan) Program, the institution and its representatives shall comply with the statute, guidelines, and regulations governing the Title IV, Part D, William D. Ford Federal Direct Loan Program as required by 20 U.S.C. §§ 1087a *et seq.* (Part C) and 34 C.F.R. Part 685.

The institution will:

1. Provide for the establishment and maintenance of a Direct Loan Program at the Institution that will:

   Identify eligible students who seek student financial assistance in accordance with Section 484 of the Higher Education Act of 1965, as amended (the HEA).

   Estimate the need of students as required under Title IV, Part F of the HEA.

   Provide a certification statement of eligibility for students to receive loans that will not exceed the annual or aggregate limits, except the Institution may exercise its authority, under exceptional circumstances identified by the Secretary, to refuse to certify a statement that permits a student to receive a loan, or certify a loan amount that is less than the student's determination of need, if the reason for such action is documented and provided in written form to a student.

   Establish a schedule for disbursement of loan proceeds to meet the requirements of Section

428G of the HEA.

Provide timely and accurate information to the Secretary concerning 1) the status of borrowers while students are in attendance, any new information pertaining to the status of student borrowers of which the Institution becomes aware after the student leaves the Institution, and 2) the utilization of Federal funds under Title IV, Part D of the HEA at such times and in such manner as prescribed by the Secretary.

2. Comply with requirements established by the Secretary relating to student loan information with respect to the Direct Loan Program.

3. Provide that students at the Institution and their parents (with respect to such students) will be eligible to participate in the programs under Title IV, Part B of the HEA, Federal Family Education Loan programs, at the discretion of the Secretary for the period during which such Institution participates in the Direct Loan Program, except that a student or parent may not receive loans under both Title IV, Part B and Part D of the HEA for the same period of enrollment.

4. Provide for the implementation of a quality assurance system, as established by the Secretary and developed in consultation with Institutions of higher education, to ensure that the Institution is complying with program requirements and meeting program objectives.

5. Provide that the Institution will not charge any fees of any kind, regardless of how they are described, to student or parent borrowers for loan application, or origination activities (if applicable), or the provision and processing of any information necessary for a student or parent to receive a loan under Title IV, Part D of the HEA.

6. Provide that the Institution will originate loans to eligible students and parents in accordance with the requirements of Title IV, Part D of the HEA and use funds advanced to it solely for that purpose (Option 2 only).

7. Provide that the note or evidence of obligation of the loan shall be the property of the Secretary (Options 2 and 1 only).

8. Comply with other provisions as the Secretary determines are necessary to protect the interest of the United States and to promote the purposes of Title IV, Part D of the HEA.

9. Accept responsibility and financial liability stemming from its failure to perform its functions under this Program Participation Agreement.

## CERTIFICATIONS REQUIRED FROM INSTITUTIONS

The Institution should refer to the regulations cited below. Signature on this Agreement provides for compliance with the certification requirements under 34 C.F.R. Part 82, "New Restrictions on Lobbying," 34 C.F.R Part 84, "Governmentwide Requirements for Drug-Free Workplace (Financial Assistance)," 34 C.F.R. Part 85, "Governmentwide Debarment and Suspension (Nonprocurement)," and 34 C.F.R. Part 86, "Drug and Alcohol Abuse Prevention." Breach of any of these certifications constitutes a breach of this Agreement.

## PART 1 CERTIFICATION REGARDING LOBBYING; DRUG-FREE

## WORKPLACE; DEBARMENT, SUSPENSION AND OTHER RESPONSIBILITY MATTERS; AND DRUG AND ALCOHOL ABUSE PREVENTION

### *1. Lobbying*

As required by Section 1352, Title 31 of the U.S. Code, and implemented at 34 C.F.R. Part 82, for persons entering into a Federal contract, grant or cooperative agreement over $100,000, as defined at 34 C.F.R. Part 82, Sections 82.105, and 82.110, the undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan or cooperative agreement, the undersigned shall complete and submit Standard Form - LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

(3) The Institution shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants and contracts under grants, loans and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

### *2a. Drug-Free Workplace (Grantees Other Than Individuals)*

As required by the Drug-Free Workplace Act of 1988, and implemented at 34 C.F.R. Part 84, Subpart B, for grantees, as defined at 34 C.F.R. Part 84, Sections 84.200 through 84.230 -

The Institution certifies that it will or will continue to provide a drug-free workplace by:

(a) Publishing a drug-free workplace statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;

(b) Establishing an on-going drug-free awareness program to inform employees about-

  (1) The dangers of drug abuse in the workplace;

  (2) The Institution's policy of maintaining a drug-free workplace;

  (3) Any available drug counseling, rehabilitation, and employee assistance programs; and

  (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;

(c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);

(d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will -

  (1) Abide by the terms of the statement, and

(2) Notify the employer in writing if he or she is convicted for a violation of a criminal drug statute occurring in the workplace no more than five calendar days after such conviction;

(e) Notifying the agency, in writing, within 10 calendar days after receiving notice under this subparagraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to: Director, Grants and Contracts Service, U.S. Department of Education, 400 Maryland Avenue, S.W., Washington, DC 20202. Notice shall include the identification number(s) of each affected grant;

(f) Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is so convicted -

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1972, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

(g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e), and (f).

## *2b. Drug-Free Workplace (Grantees Who Are Individuals)*

As required by the Drug-Free Workplace Act of 1988, and implemented at 34 C.F.R. Part 84, Subpart C, for recipients who are individuals, as defined at 34 C.F.R. Part 84, Section 84.300 -

1. As a condition of the grant, the Institution certifies that it will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity related to the award; and
2. If any officer or owner of the Institution is convicted of a criminal drug offense resulting from a violation occurring during the conduct of any award activity, the Institution will report the conviction, in writing, within 10 calendar days of the conviction, to: Director, Grants and Contracts Service, U.S. Department of Education, 400 Maryland Avenue, S.W., Washington, DC 20202. Notice shall include the identification number(s) of each affected grant.

## *3. Debarment, Suspension, and Other Responsibility Matters*

As required by Executive Order 12549, Debarment and Suspension, and implemented at 34 C.F.R. Part 85, for prospective participants in primary covered transactions as defined at 34 C.F.R. Part 85, Sections 85.105 and 85.110, the Institution certifies that it and its principals:

(a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency;

(b) Have not within a three-year period preceding this application been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public or private agreement or transaction; violation of Federal or State antitrust statutes; commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, tax evasion, receiving stolen property, making false claims, or obstruction of justice; or commission of any other offense indicating a lack of business integrity or business honesty that seriously and directly affects their present responsibility.

(c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State, or local) with commission of any of the offenses enumerated in

paragraph (b) of this certification; and

(d) Have not within a three-year period preceding this application had one or more public transactions (Federal, State, or local) terminated for cause or default.

## *4. Drug and Alcohol Abuse Prevention*

As required by the Drug-Free Schools and Communities Act Amendments of 1989, which added section 1213 to the Higher Education Act, and implemented at 34 C.F.R. Part 86, the undersigned Institution certifies that it has adopted and implemented a drug prevention program for its students and employees that, at a minimum, includes--

1. The annual distribution in writing to each employee, and to each student who is taking one or more classes for any kind of academic credit except for continuing education units, regardless of the length of the student's program of study, of:
    - Standards of conduct that clearly prohibit, at a minimum, the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees on its property or as part of any of its activities.
    - A description of the applicable legal sanctions under local, State or Federal law for the unlawful possession or distribution of illicit drugs and alcohol.
    - A description of the health risks associated with the use of illicit drugs and the abuse of alcohol.
    - A description of any drug or alcohol counseling, treatment, or rehabilitation or re-entry programs that are available to employees or students.
    - A clear statement that the Institution will impose disciplinary sanctions on students and employees (consistent with local, State and Federal law), and a description of those sanctions, up to and including expulsion or termination of employment and referral for prosecution, for violation of the standards of conduct. A disciplinary sanction may include the completion of an appropriate rehabilitation program.
2. A biennial review by the Institution of its program to:
    - Determine its effectiveness and implement changes to the program if they are needed.
    - Ensure that its disciplinary sanctions are consistently enforced.

## PART 2 CERTIFICATION REGARDING DEBARMENT, SUSPENSION, INELIGIBILITY, AND VOLUNTARY EXCLUSION -- LOWER TIER COVERED TRANSACTIONS

**The Institution is to obtain the signatures of Lower Tier Contractors on reproduced copies of the certification below, and retain the signed certification(s) in the Institution's files.**

| CERTIFICATION BY LOWER TIER CONTRACTOR<br>(Before Completing Certification, Read Instructions for This Part 3, below) | |
|---|---|
| (1) The prospective lower tier participant certifies by submission of this proposal, that neither it nor its principals are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal Department or Agency.<br>(2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal. | |
| Name of Lower Tier Organization | PR/Award Number or Project Name |
| Name of Authorized Representative | Title of Authorized Representative |
| Signature of Authorized Representative | Date |

1. By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
2. The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
3. The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
4. The terms "covered transaction," "debarred," "suspended," "ineligible," "lower tier covered transaction," "participant," "person," "primary covered transaction," "principal," "proposal," "voluntarily excluded," as used in this clause, have the meanings set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to whom this proposal is submitted for assistance in obtaining a copy of those regulations.
5. The prospective lower tier participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.
6. The prospective lower tier participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility, and

Voluntary Exclusion--Lower Tier Covered Transactions," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that is not debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the Nonprocurement List.
8. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
9. Except for transactions authorized under paragraph 5 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

**NOTE:** A completed copy of the "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion--Lower Tier Covered Transactions" form must be retained by the Institution. The original blank certification must be returned with the PPA.

## IN WITNESS WHEREOF

the parties hereto have caused this Agreement to be executed by their duly authorized representatives.

Signature of Institution's
Chief Executive Officer: _____ Date: _____

Print Name and Title: _____

_____

For the Secretary: _____ Date: _____
U.S. Department of Education

FEDERAL STUDENT AID START HERE. GO FURTHER.

**UNITED STATES DEPARTMENT OF EDUCATION**

FEDERAL STUDENT AID
SCHOOL ELIGIBILITY CHANNEL
SCHOOL PARTICIPATION TEAM
KANSAS CITY TEAM

Dr. George B. Forsythe
President
Westminster College
501 Westminster Avenue
Fulton, MO 65251-1299

04/03/2013

**OPE ID 00252300**

**Approval Notice**

Reason for Action: Additional Location
Officials/Directors of Institution
Approval Date: Effective 04/02/2013

Dear Dr. Forsythe:

The Kansas City School Participation Division has completed its review of the documentation that Westminster College (Institution) submitted regarding its additional location and officials/directors of institution.

As a result of that review, we have approved the following:

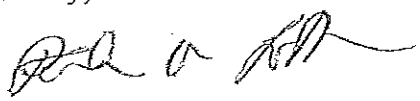
New official(s):
Mr. Phil Daniels, Vice President for Business & Finance

New location(s):
OPEID: 00252301 - Westminster College -,
245 West Second Street, Mesa, AZ 85201-6542

Please print a copy of this notice and the Eligibility and Certification Approval Report (ECAR) from the EAPP website at http://eligcert.ed.gov/eapp/owa/ecar. This Approval Notice is an addendum to the Institution's Program Participation Agreement (PPA). Please retain this notice and the ECAR with the PPA for compliance purposes.

Should you have any questions, please contact Knovelrhea Rogers at (816) 268-0428.

Sincerely,



Ralph LoBosco
Area Case Director
School Participation Team, SC
Kansas City Team

cc: Aimee S. Bristow, Director of Financial Aid

START HERE
GO FURTHER
FEDERAL STUDENT AID

# UNITED STATES DEPARTMENT OF EDUCATION

## SCHOOL PARTICIPATION MANAGEMENT DIVISION

## *ELIGIBILITY AND CERTIFICATION APPROVAL REPORT*

DATE PRINTED: 04/03/2013



NAME AND ADDRESS OF INSTITUTION: Westminster College
501 Westminster Avenue
Fulton, MO 65251-1299

TYPE OF INSTITUTION: Private, Nonprofit

CONGRESSIONAL DISTRICT: 09
DEPARTMENT REGION: 07
SCHOOL PARTICIPATION TEAM: 07

ACTION DATE: 02/14/2011
ACTION: Reapprove Elig/Full Cert

OPE ID: 00252300
TIN: 430652617
IPEDS ID: 179946
DUNS NBR: 080019433

FEDERAL PELL GRANT ID: 002523
FEDERAL FAMILY EDUCATION LOAN ID: 002523
FEDERAL DIRECT STUDENT LOAN ID: G02523
FEDERAL PERKINS LOAN ID: 002404
FEDERAL SCHOOL CODE: 002523
FEDERAL WORK STUDY ID: 002404
FEDERAL SUPPLEMENTAL EDUCATIONAL OPPORTUNITY GRANT ID: 002404

ACADEMIC CALENDAR: Semester Hours
EDUCATIONAL PROGRAM LEVELS OFFERED:
Bachelor's Degree
Professional Certification

ELIGIBLE: Y
INITIAL APPROVAL DATE: 12/01/1965
CERTIFIED: Certified
LOAN DEFERMENT: Y
PROGRAM PARTICIPATION AGREEMENT
EFFECTIVE DATE: 03/22/2011
EXPIRATION DATE: 12/31/2016

WAIVER(S):
*** End of Waivers ***

THE INSTITUTION IS ELIGIBLE TO APPLY FOR PARTICIPATION IN THE FOLLOWING PROGRAMS AUTHORIZED UNDER THE HIGHER EDUCATION ACT OF 1965, AS AMENDED:

| | | | | |
|---|---|---|---|---|
| TITLE I: Y | TITLE IV: Y | TITLE VII: Y | TITLE X: Y | TITLE XIII: Y |
| TITLE II: Y | TITLE V: Y | TITLE VIII: Y | TITLE XI: Y | TITLE XIV: Y |
| TITLE III: Y | TITLE VI: Y | TITLE XI: Y | TITLE XII: Y | TITLE XV: Y |

Program: TEACH GRANT Certified: Y DATE: 09/03/2008

TITLE IV STUDENT FINANCIAL ASSISTANCE PROGRAMS

| PROGRAM | CERTIFIED | APPROVAL DATE | PROGRAM | CERTIFIED | APPROVAL DATE |
|---|---|---|---|---|---|
| FWS Com Serv | Y | 12/01/1965 | FWS Priv Sec Empl | Y | 12/01/1965 |
| FWS Job Loc Dev | Y | 12/01/1965 | FFEL Staff | Y | 12/01/1965 |
| FFEL Staff Unsub | Y | 12/01/1965 | FFEL PLUS | Y | 12/01/1965 |
| FPerkins | Y | 12/01/1965 | FSEOG | Y | 12/01/1965 |
| FPell | Y | 07/01/1972 | FDSLP Staff | Y | 07/01/1994 |
| FDSLP Staff Unsub | Y | 07/01/1994 | FDSLP PLUS | Y | 07/01/1994 |

**** End of Section A ****

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FEDERAL STUDENT AID

# UNITED STATES DEPARTMENT OF EDUCATION

## SCHOOL PARTICIPATION MANAGEMENT DIVISION

***ELIGIBILITY AND CERTIFICATION APPROVAL REPORT***



INSTITUTION NAME : Westminster College
OPE ID : 002523 00
INSTITUTION TYPE : Private, Nonprofit

ACCREDITATION

| ACCREDITING AGENCY | DESIGNATION | SCOPE | EFFECTIVE YEAR | NUMBER OF YEARS |
|---|---|---|---|---|
| North Central Association of Colleges and Schools - CIHE (Higher Educ) | Primary | Institutional | 2005 | 10 |

**** End of Accreditation Section ****

START HERE
GO FURTHER
FEDERAL STUDENT AID

# UNITED STATES DEPARTMENT OF EDUCATION

## SCHOOL PARTICIPATION MANAGEMENT DIVISION

***ELIGIBILITY AND CERTIFICATION APPROVAL REPORT***



INSTITUTION NAME : Westminster College
OPE ID : 002523 00
INSTITUTION TYPE : Private, Nonprofit

STATE AUTHORIZATION

STATE AGENCY
MO Coordinating Board for Higher Education (Exempt)

**** End of State Authorization Section ****

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GO FURTHER
FEDERAL STUDENT AID

# UNITED STATES DEPARTMENT OF EDUCATION

## SCHOOL PARTICIPATION MANAGEMENT DIVISION

## *ELIGIBILITY AND CERTIFICATION APPROVAL REPORT*



INSTITUTION NAME : Westminster College
OPE ID : 002523 00
INSTITUTION TYPE : Private, Nonprofit

OFFICIALS

| NAME AND ADDRESS | TITLE | PHONE<br>FAX | E-MAIL |
|---|---|---|---|
| Forsythe, George B<br>501 Westminster Avenue<br>Fulton, MO 65251-1299 | President<br>Boards Recording Secretary | (573) 592-5315<br>(573) 592-5140 | barney.forsythe@<br>westminster-mo.edu |
| Bristow, Aimee S<br>501 Westminster Avenue<br>Fulton, MO 65251-1299 | Director of Financial Aid | (573) 592-5364<br>(573) 592-5255 | aimee.bristow@<br>westminster-mo.edu |
| Daniels, Phil<br>501 Westminster Avenue<br>Fulton, MO 65251-1299 | Vice President for Business & Finance | (573) 592-5225<br>(573) 592-5227 | phil.daniels@<br>westminster-mo.edu |
| Biehl, Heather A | Member of the Board | | |
| Boswell, Scott S | Member of the Board | | |
| Brookby, Bruce K | Member of the Board | | |
| Daniels, William D | Member of the Board | | |
| Head, Wallace L | Member of the Board | | |
| Monroe, C. Robert | Member of the Board | | |
| Muehlhauser, G. Robert | Member of the Board | | |
| Mueller, Kent C | Member of the Board | | |
| Oakley, Harold B | Member of the Board | | |
| Panettiere, John M | Member of the Board | | |
| Richardson, Suzanne | Member of the Board | | |
| Schneider, Anne E | Member of the Board | | |
| Taylor, Linda G | Member of the Board | | |
| Taylor, Lloyd B | Member of the Board | | |
| Wilson, Scott J | Member of the Board | | |

| | |
|---|---|
| Winney, Ronald D | Member of the Board |

**** End of Officials Section ****

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GO FURTHER
FEDERAL STUDENT AID

# UNITED STATES DEPARTMENT OF EDUCATION

## SCHOOL PARTICIPATION MANAGEMENT DIVISION

## *ELIGIBILITY AND CERTIFICATION APPROVAL REPORT*

DATE PRINTED: 04/03/2013 ADDITIONAL LOCATIONS SECTION 

INSTITUTION NAME : Westminster College
OPE ID : 002523 00
INSTITUTION TYPE : Private, Nonprofit

ADDITIONAL LOCATIONS

| OPE ID | NAME AND ADDRESS | APPROVED FOR CERTIFICATION | INITIAL APPROVAL DATE |
|---|---|---|---|
| 00252301 | Westminster College -<br>245 West Second Street<br>Mesa, AZ 85201-6542 | Y | 04/02/2013 |

**** End of Additional Locations Section ****

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GO FURTHER
FEDERAL STUDENT AID

# UNITED STATES DEPARTMENT OF EDUCATION

## SCHOOL PARTICIPATION MANAGEMENT DIVISION

***ELIGIBILITY AND CERTIFICATION APPROVAL REPORT***



INSTITUTION NAME : Westminster College
OPE ID : 002523 00
INSTITUTION TYPE : Private, Nonprofit

SERVICER INFORMATION

| SERVICER NAME | CONTACT NAME | SERVICES OFFERED |
|---|---|---|
| Affiliated Computer Services, Inc.<br>875 West Elliot Road<br>Tempe, AZ 85284 | Ms. Bob Johnson | Performing Loan Collection<br>Performing Loan Servicing |
| General Recovery Corp<br>336 Bell Dr<br>Cary, IL 60013 | John Schwarm | Performing Loan Collection<br>Performing Loan Servicing |
| S & S Recovery<br>PO Box 34787<br>Memphis, TN 38135 | Jason Woodall | Performing Loan Collection<br>Performing Loan Servicing |
| Windham Professionals, Inc.<br>380 Main Street<br>Salem, NH 03079 | Mr. Robert Kliethermes | Performing Loan Collection<br>Performing Loan Servicing |

**** End of Servicer Information Section ****

Return to the Application Index

# Private Loan Programs

Westminster College requires all students to apply for Federal financial aid through the FAFSA before they can apply for a Private student loan. Students who inquire about private student loans are directed to http://www.westminster-mo.edu/admissions/finaid/Types/Loans/Pages/Private.aspx. At this website, students are provided general information about private student loans.

Our website is linked to Fast Choice provided by Great Lakes to provide a list of lenders our students have historically borrowed from. Before students can view the list of lenders, they are provided with the option to complete "Borrower Essentials" to educate themselves about private loans. Students have the option to bypass the Borrower Essentials to go straight to the lender list. After reviewing the lender list, students can go directly to the respective website for the lender they wish to apply for a loan with.

The following lenders are currently listed on our list:

- Anheuser-Busch Employees' Credit Union
- Discover Student Loans
- Sallie Mae
- Wells Fargo
- Suntrust

In addition to the private loan lenders listed above, our students are also eligible to apply for a student loan through the Missouri Family Education Loan Program (MOFELP) provided by the Missouri Scholarship and Loan Foundation. As a private college in Missouri, Westminster College students can borrow a maximum of $50,000 per academic year, and the maximum amount per student is $5000. The Financial Aid Office provides a MOFELP packet to individual students who are interested in applying after we have notified them about the loan option.

# Clery Act Compliance

**Policy: Annual Disclosure of Crime Statistics**
Campus Security prepares a Campus Crime Statistics Report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. Click here to view current crime statistics data or you may access current crime statistics for Westminter College at the web site of the Office of Postsecondary Education www.ope.ed.gov/security/search.asp . Campus Security is the reporting authority to the Office of Postsecondary Education for the annual disclosure of crime statistics. Campus Security collects statistics from the Fulton Police Department, Office of Student Life, Counseling & Health Services, and any other campus security authority as defined under the Jeanne Clery Disclosure of Campus Security Policies and Campus Crime Statistics Act.

Campus Security also collects statistical information from the Fulton Police Department for all public and privately held properties adjacent or contiguous to the campus as defined by federal law. Counseling & Health Services has a procedure in place to anonymously capture crime statistics disclosed during confidential sessions.

Westminster College reports crime using the definitions as described in the Federal Bureau of Investigation's Uniform Crime Reporting Handbook as required by Clery Act regulations. Officials of the College that meet this definition are required by federal law to notify Campus Security of crime that is defined under the "Jeanne Clery Disclosure of Campus Security Policies and Campus Crime Statistics Act".

**Crime may be reported to the following titles and organizations:**
Dean of Student Life 573-592-5240
Counseling & Health Services 573-592-5361
Campus Security 573-592-5555
Fulton Police Department 573-592-3100

Each year e-mail notification is sent to all enrolled students with a link to online campus crime statistics campus crime statistics. Crime statistics may also be obtained at the Office of Student Life or by contacting the Director of Campus Security at 573-592-5555.

**Policy: Reporting Crime**
Contact Campus Security at 573-592-5555 (non-emergencies), dial 9-1-1 (emergencies only), or by using the Emergency Phone Towers located on the Westminster College Campus ( see campus map ). Any suspicious activity or person seen in the parking lots or loitering around vehicles, inside buildings or around the residential halls or houses should be promptly reported to Campus Security. In addition, you may report a crime to the following areas:

**Dean of Student Life**
573-592-5241 or 573-592-5240

**Director of Counseling & Health Services**
573-592-5361 or 573-592-5362

**Director of Residential & Greek Life**
573-592-5242 or 573-592-5307

To report a crime or an emergency on the Westminster College campus property, call Campus Security at 573-592-5555. Community members, students, faculty, staff and guests are encouraged to report all crimes and public safety related incidents in a timely manner. Security Officers are on duty 24/7 to answer your call.

In response to a call, Campus Security will take the required action, respond to the scene, contact the Fulton Police Department for assistance or ask the victim to file an incident report. All incident reports are forwarded to the Dean of Student Life office for review and potential action. If a sexual assault or rape should occur, Counseling and Health Services is on-call and counselors will be summoned by Campus Security to offer appropriate services.

All crimes should be reported to Campus Security to ensure inclusion in the Annual Crime Statistics Report and to aid in providing Timely Warning Notices to the community when appropriate.

**Policy: Timely Warning**
When a situation occurs, on or near campus, that the Director of Campus Security perceives to be a threat to the Westminster campus community, a "Timely Warning" will be issued. The warning will be issued through the college e-mail system to students, faculty and staff. If time permits, posters or notices will be prepared and placed on bulletin boards in the various buildings on campus.

**Policy: Voluntary Confidential Reporting**
If you are the victim of a crime and do not want to pursue action within the Westminster College or the Criminal Justice system, you may still want to consider making a confidential report. With your permission, the Director of Campus Security or an administrator of Westminster College can file a report on the details of the incident without revealing your identity. The purpose of a confidential report is to comply with your wish to keep the matter confidential, while taking steps to ensure the future safety of yourself and others. With such information, the College can keep accurate records of the number of incidents involving students; determine where there is a pattern of crime with regard to a particular location, method, or assailant and alert the Campus Community to

potential danger. Reports filed in this manner are counted and disclosed in the annual crime statistics for the institution.

Policy: Facility Security and Access
During business hours, College facilities are open to students, parents, employees, contractors, guests and invites. During non-business hours, access to College facilities is by key or via a Campus Security officer or member of Residential Life. During breaks and holidays, the college will admit only those with prior approval.

Residence Halls are secured 24 hours a day. Admittance is gained either by code or key. Some facilities may have individual hours, which may vary throughout the year. Examples are the Coulter Science Center, Reeves/Hazel Library and Hunter Activity Center which are secured according to schedules developed by the department responsible for the facility.

Emergencies may necessitate changes or alterations to any posted schedules. If any areas become problematic a site security audit will be conducted. Additionally, the Plant Operations & Campus Security Leadership Team meet weekly to discuss and develop action plans on any issues of concern.

Policy: Campus Law Enforcement
Campus Security Officers have the authority to ask persons for identification and to determine whether individuals have lawful business at Westminster College. Campus Security has the authority to issue parking tickets which are billed to financial accounts of students, faculty and staff. Campus Security does not possess arrest power, though they may conduct searches of campus dorms and residences. Criminal incidents are referred to the local police department who has jurisdiction at Westminster College. Campus Security maintains a highly professional working relationship with the City of Fulton Police Department and the Callaway County Sheriff?s Department. All crime victims and witnesses are strongly encouraged to immediately report any crime to Campus Security and the Fulton Police Department. Prompt reporting will assure Timely Warning Notices for the campus community and the accurate disclosure of crime statistics.

Policy: Accurate and Prompt Crime Reporting
Community members, students, faculty, staff and guests are encouraged to report all crimes and public safety related incidents to Campus Security in a timely manner.

To report a crime or an emergency on the Westminster College campus property, call Campus Security at 573-592-5555.

Security Officers are on duty 24/7 to answer your call. In response to a call, Campus Security will take the required action, respond to the scene, contact the Fulton Police Department for assistance or ask the victim to file an incident report with Campus Security. All incident reports are forwarded to the Dean of Student Life office for review and potential action. If a sexual assault or rape should occur, Counseling and Health Services has 24/7 on-call counselors who will be summoned by Security to offer the victim a wide variety of services.

All crimes should be reported to Campus Security to ensure inclusion in the Annual Crime Statistics Report and to aid in providing Timely Warning Notices to the community when appropriate.

Policy: Counseling Services
As a result of the negotiated rule making process which followed the 1998 amendments to 20 U.C.S. Section 1092(f), clarification was given to those considered to be campus security authorities, "Pastoral Counselors" and "Professional Counselors", when acting as such are not considered to be a campus security authority and are not required to report crimes for inclusion into the annual disclosure of crime statistics. As a matter of policy, they are encouraged; if and when they deem it appropriate, to inform persons being counseled of the procedures to report crimes on a voluntary basis for inclusion into the annual crime statistics.

The rule making committee defines counselors as:
Pastoral -An employee of an institution, who is associated with a religious order or denomination, recognized by that religious order or denomination as someone who provides confidential counseling and who is functioning within the scope of that recognition as a pastoral counselor.
Professional -An employee of an institution whose official responsibilities include psychological counseling for members of the institution's community and who is functioning within the scope of his or her license or certification.

Policy: Security Awareness Programs
During orientation, students are informed of services offered by Westminster College Campus Security and the Fulton Police Department. Video and slide presentations outline ways to maintain personal safety and residence hall security.

Periodically during the academic year Westminster Campus Security and the College Safety Committee, as well as other organizations and departments, present seminars and crime prevention awareness sessions. In addition, information is disseminated to students, faculty, and staff through crime prevention awareness packets, security alert posters, and emails generated by various community groups and organizations.

Policy: Crime Prevention Programs
Crime prevention programs for personal safety and crime prevention are sponsored by various campus organizations throughout the year. Campus Security and Safety Committee personnel facilitate programs for individual students and student organizations as well as faculty and staff. In addition, the Department of Greek & Residential Life educates students about how to protect themselves from sexual assault, theft and other crime.

Policy: Off-Campus Crime
When a Westminster College student is involved in an off-campus offense, Campus Security may assist with the investigation in cooperation with the local police department. Fulton Police Department routinely works and communicates with Campus Security on incidents occurring on-campus, in the immediate neighborhood and business areas surrounding campus. Campus Security can and do respond to student-related incidents that occur in close proximity to campus. Campus Security has direct radio communication with the city police, fire department, and ambulance service to facilitate rapid response in any emergency situation.

Policy: Drug & Alcohol Abuse

The policy for alcohol and drug abuse is located in the Student Handbook. The Student Handbook can be obtained through the Office of Student Life at 573-592-5240 or online.

**Policy: Addressing Sex Offenses**
Westminster College educates the student community about sexual assault and date rape through mandatory freshman orientation. Each fall, the Fulton Police Department offers sexual assault education and information programs to college students and employees. Literature on sexual assault risk reduction is also available through Westminster College Counseling & Health Services.

If you are a victim of a sexual assault, your first priority should be to get to a place of safety and obtain necessary medical treatment. Time is a critical factor for evidence collection and preservation. Campus Security strongly advocates that a victim of sexual assault report the incident in a timely manner. An assault should be reported to a Campus Security officer and/or Resident Advisor. Filing an incident report with a Campus Security Officer will not obligate the victim to prosecute nor will it subject the victim to scrutiny or judgment.

Any victim of sexual assault has the right to request a change in living areas or academic situations. If an immediate threat is felt by a person, they can and will be assigned a room on a temporary basis until such time as the threat is removed or eliminated. Arrangements should be made by contacting the Residential and Greek Life office. Academic changes can also be made and should be requested by contacting the Dean of Faculty.

**Filing a police report will:**
1. Ensure that a victim of sexual assault receives the necessary medical treatment and tests at no expense to the victim.
2. Provide the opportunity for collection of evidence helpful in prosecution which cannot be obtained later (ideally a victim of sexual assault should not wash, douche, use the toilet or change clothing prior to a medical/legal exam).
3. Assure that the victim has access to free confidential counseling from counselors specifically trained in the area of sexual assault crisis intervention.

**Policy: On-Campus Disciplinary Action**
Accuser and accused will have the same rights to have others present at the disciplinary proceedings according to the College disciplinary process. Both the accuser and the accused will be informed of the outcome of any disciplinary proceeding when the charge is a violent act. Victims must be informed of their option to notify proper law enforcement authorities, and their option to be assisted in doing so.

**Policy: Sex Offender Registration**
In accordance with the Campus Sex Crimes Prevention Act, the Campus Security webpage provides a link to the Callaway County Registered Offender List www.callawaycountysheriff.org/offender/view.php This act amends the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Registration Act, the Jeanne Clery Act and the Family Educational Rights and Privacy Act of 1974 and requires institutions of higher education to issue a statement advising the campus community where information about registered sex offenders may be obtained. It also requires sex offenders to provide notice to each institution of higher education at which the person is employed, carries a vocation or is a student.

As required by the Missouri Revised Statutes Chapter 589.400, the Callaway County Sheriff's Department maintains a list of convicted offenders residing in Callaway County who are registered under section 589.400 RsMo.

**Policy: Annual Security Report**
Westminster College Campus Security compiles an Annual Security Report. This report contains statistics of crime which occurs on campus, in certain off-campus buildings or property owned or controlled by Westminster College; and public property within, or immediately adjacent to or accessible from the campus. This report includes institutional policy regarding campus security, crime prevention and reporting. You can obtain a copy of the Annual Security Report by contacting Campus Security Director at 573-592-5342 or the Director of Plant Operations at 573-592-5282.

# Crime Statistics

| Criminal Offenses On Campus | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
|---|---|---|---|---|---|---|
| a. Murder/Non-negligent manslaughter | 0 | 0 | 0 | 0 | 0 | 0 |
| b. Negligent manslaughter | 0 | 0 | 0 | 0 | 0 | 0 |
| c. Sex offenses-forcible | 2 | 0 | 0 | 1 | 6 | 2 |
| d. Sex offenses-non-forcible (incest & statutory rape only) | 0 | 0 | 0 | 0 | 0 | 0 |
| e. Robbery | 0 | 1 | 0 | 0 | 0 | 0 |
| f. Aggravated assault | 0 | 1 | 4 | 1 | 0 | 1 |
| g. Burglary | 3 | 6 | 2 | 2 | 4 | 1 |
| h. Motor vehicle theft | 0 | 0 | 1 | 0 | 0 | 0 |
| i. Arson | 1 | 0 | 0 | 0 | 0 | 0 |

| Criminal Offenses On Campus Student Housing Facilities | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
|---|---|---|---|---|---|---|
| a. Murder/Non-negligent manslaughter | 0 | 0 | 0 | 0 | 0 | 0 |
| b. Negligent manslaughter | 0 | 0 | 0 | 0 | 0 | 0 |
| c. Sex offenses-forcible | 0 | 0 | 0 | 1 | 6 | 2 |
| d. Sex offenses-non-forcible (incest & statutory rape only) | 0 | 0 | 0 | 0 | 0 | 0 |
| e. Robbery | 0 | 1 | 0 | 0 | 0 | 0 |
| f. Aggravated assault | 0 | 1 | 4 | 0 | 0 | 1 |
| g. Burglary | 1 | 6 | 2 | 2 | 4 | 1 |
| h. Motor vehicle theft | 0 | 0 | 0 | 0 | 0 | 0 |
| i. Arson | 0 | 0 | 0 | 0 | 0 | 0 |

| Criminal Offenses Non-Campus | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
|---|---|---|---|---|---|---|
| a. Murder/Non-negligent manslaughter | 0 | 0 | 0 | 0 | 0 | 0 |
| b. Negligent manslaughter | 0 | 0 | 0 | 0 | 0 | 0 |
| c. Sex offenses-forcible | 0 | 0 | 0 | 0 | 4 | 0 |
| d. Sex offenses-non-forcible (incest & statutory rape only) | 0 | 0 | 0 | 0 | 0 | 0 |
| e. Robbery | 0 | 0 | 0 | 0 | 0 | 0 |
| f. Aggravated assault | 0 | 0 | 0 | 0 | 0 | 0 |
| g. Burglary | 0 | 0 | 1 | 0 | 0 | 0 |
| h. Motor vehicle theft | 0 | 0 | 0 | 0 | 0 | 0 |
| i. Arson | 0 | 0 | 0 | 0 | 0 | 0 |

| Criminal Offenses Public Property | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
|---|---|---|---|---|---|---|
| a. Murder/Non-negligent manslaughter | 0 | 0 | 0 | 0 | 0 | 0 |
| b. Negligent manslaughter | 0 | 0 | 0 | 0 | 0 | 0 |
| c. Sex offenses-forcible | 0 | 0 | 0 | 0 | 0 | 0 |
| d. Sex offenses-non-forcible (incest & statutory rape only) | 0 | 0 | 0 | 0 | 0 | 0 |
| e. Robbery | 0 | 0 | 0 | 0 | 0 | 0 |
| f. Aggravated assault | 0 | 1 | 1 | 0 | 0 | 0 |
| g. Burglary | 0 | 0 | 0 | 0 | 0 | 0 |

| | | | | | | |
|---|---|---|---|---|---|---|
| h. Motor vehicle theft | 0 | 1 | 0 | 0 | 0 | 0 |
| i. Arson | 0 | 0 | 0 | 0 | 0 | 0 |

| Hate Crimes On Campus | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
|---|---|---|---|---|---|---|
| a. Murder/Non-negligent manslaughter | 0 | 0 | 0 | 0 | 0 | 0 |
| b. Negligent manslaughter | 0 | 0 | 0 | 0 | 0 | 0 |
| c. Sex offenses-forcible | 0 | 0 | 0 | 0 | 0 | 0 |
| d. Sex offenses-non-forcible (incest & statutory rape only) | 0 | 0 | 0 | 0 | 0 | 0 |
| e. Robbery | 0 | 0 | 0 | 0 | 0 | 0 |
| f. Aggravated assault | 0 | 0 | 0 | 0 | 0 | 0 |
| g. Burglary | 0 | 0 | 0 | 0 | 0 | 0 |
| h. Motor vehicle theft | 0 | 0 | 0 | 0 | 0 | 0 |
| i. Arson | 0 | 0 | 0 | 0 | 0 | 0 |

| Hate Crimes On Campus Student Housing | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
|---|---|---|---|---|---|---|
| a. Murder/Non-negligent manslaughter | 0 | 0 | 0 | 0 | 0 | 0 |
| b. Negligent manslaughter | 0 | 0 | 0 | 0 | 0 | 0 |
| c. Sex offenses-forcible | 0 | 0 | 0 | 0 | 0 | 0 |
| d. Sex offenses-non-forcible (incest & statutory rape only) | 0 | 0 | 0 | 0 | 0 | 0 |
| e. Robbery | 0 | 0 | 0 | 0 | 0 | 0 |
| f. Aggravated assault | 0 | 0 | 0 | 0 | 0 | 0 |
| g. Burglary | 0 | 0 | 0 | 0 | 0 | 0 |
| h. Motor vehicle theft | 0 | 0 | 0 | 0 | 0 | 0 |
| i. Arson | 0 | 0 | 0 | 0 | 0 | 0 |

| Hate Crimes Non-Campus | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
|---|---|---|---|---|---|---|
| a. Murder/Non-negligent manslaughter | 0 | 0 | 0 | 0 | 0 | 0 |
| b. Negligent manslaughter | 0 | 0 | 0 | 0 | 0 | 0 |
| c. Sex offenses-forcible | 0 | 0 | 0 | 0 | 0 | 0 |
| d. Sex offenses-non-forcible (incest & statutory rape only) | 0 | 0 | 0 | 0 | 0 | 0 |
| e. Robbery | 0 | 0 | 0 | 0 | 0 | 0 |
| f. Aggravated assault | 0 | 0 | 0 | 0 | 0 | 0 |
| g. Burglary | 0 | 0 | 0 | 0 | 0 | 0 |
| h. Motor vehicle theft | 0 | 0 | 0 | 0 | 0 | 0 |
| i. Arson | 0 | 0 | 0 | 0 | 0 | 0 |

| Hate Crimes Public Property | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
|---|---|---|---|---|---|---|
| a. Murder/Non-negligent manslaughter | 0 | 0 | 0 | 0 | 0 | 0 |
| b. Negligent manslaughter | 0 | 0 | 0 | 0 | 0 | 0 |
| c. Sex offenses-forcible | 0 | 0 | 0 | 0 | 0 | 0 |
| d. Sex offenses-non-forcible (incest & statutory rape only) | 0 | 0 | 0 | 0 | 0 | 0 |
| e. Robbery | 0 | 0 | 0 | 0 | 0 | 0 |
| f. Aggravated assault | 0 | 0 | 0 | 0 | 0 | 0 |
| g. Burglary | 0 | 0 | 0 | 0 | 0 | 0 |
| h. Motor vehicle theft | 0 | 0 | 0 | 0 | 0 | 0 |
| i. Arson | 0 | 0 | 0 | 0 | 0 | 0 |

| Arrests On Campus | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
|---|---|---|---|---|---|---|
| a. Illegal weapons possession | 0 | 0 | 0 | 0 | 0 | 0 |
| b. Drug law violations | 3 | 2 | 2 | 2 | 2 | 3 |

| | | | | | | |
|---|---|---|---|---|---|---|
| c. Liquor law violations | 5 | 0 | 4 | 2 | 17 | 11 |

| Arrests On Campus Student Housing | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
|---|---|---|---|---|---|---|
| a. Illegal weapons possession | 0 | 0 | 0 | 0 | 0 | 0 |
| b. Drug law violations | 0 | 1 | 2 | 2 | 2 | 3 |
| c. Liquor law violations | 2 | 0 | 4 | 3 | 10 | 8 |

| Arrests Non-Campus | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
|---|---|---|---|---|---|---|
| a. Illegal weapons possession | 0 | 0 | 0 | 0 | 0 | 0 |
| b. Drug law violations | 0 | 0 | 0 | 0 | 0 | 0 |
| c. Liquor law violations | 0 | 0 | 0 | 0 | 0 | 0 |

| Arrests Public Property | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
|---|---|---|---|---|---|---|
| a. Illegal weapons possession | 0 | 0 | 0 | 0 | 0 | 0 |
| b. Drug law violations | 2 | 1 | 5 | 2 | 0 | 9 |
| c. Liquor law violations | 21 | 18 | 11 | 2 | 12 | 19 |

| Disciplinary Actions On Campus | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
|---|---|---|---|---|---|---|
| a. Illegal weapons possession | 0 | 1 | 0 | 0 | 0 | 0 |
| b. Drug law violations | 15 | 5 | 8 | 5 | 15 | 8 |
| c. Liquor law violations | 22 | 16 | 16 | 35 | 30 | 19 |

| Disciplinary Actions On Campus Student Housing | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
|---|---|---|---|---|---|---|
| a. Illegal weapons possession | 0 | 1 | 0 | 0 | 0 | 0 |
| b. Drug law violations | 0 | 5 | 7 | 5 | 6 | 8 |
| c. Liquor law violations | 0 | 16 | 15 | 34 | 26 | 19 |

| Disciplinary Actions Non-Campus | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
|---|---|---|---|---|---|---|
| a. Illegal weapons possession | 0 | 0 | 0 | 0 | 0 | 0 |
| b. Drug law violations | 0 | 0 | 1 | 0 | 3 | 0 |
| c. Liquor law violations | 0 | 0 | 1 | 0 | 4 | 0 |

| Disciplinary Actions Public Property | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 |
|---|---|---|---|---|---|---|
| a. Illegal weapons possession | 0 | 0 | 0 | 0 | 0 | 0 |
| b. Drug law violations | 1 | 0 | 0 | 0 | 0 | 0 |
| c. Liquor law violations | 0 | 0 | 0 | 0 | 0 | 0 |

The Jeanne Clery Act

For further information contact:
Plant Operations Department 573.592.5018
Campus Security 573.592.5555

# Get data for one institution



**Search Criteria**

- Institution name: 'Westminster College'
- Institution City: 'Fulton'
- Institution State: 'MO'

## Westminster College

**Unit ID: 179946**

### General Information

501 Westminster Ave
Fulton, MO 65251-1299
Phone: 573-642-3361

**Number of Full-time Undergraduates:** 1,016
**Men:** 564
**Women:** 452

### Athletic Department Information

**Director:** Matt Mitchell
501 WESTMINSTER AVE
FULTON, MO 65251-1299

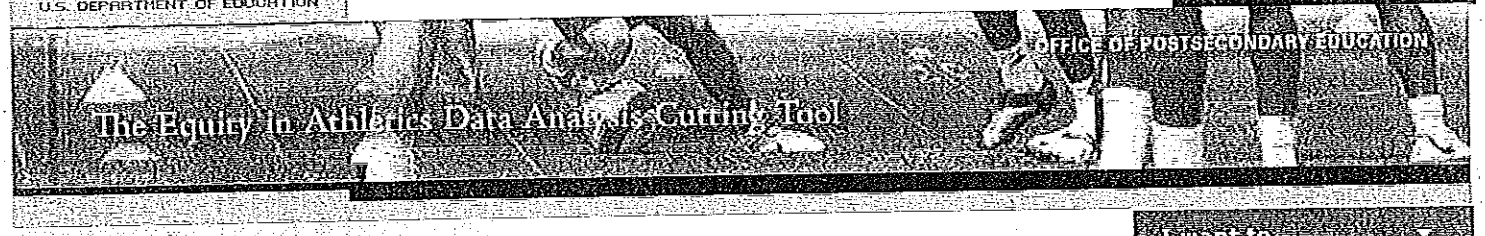
**Reporting Year:** 7/1/2013 - 6/30/2014
**Reporting Official:** Ray Brown
**Title:** Director, Institutional Research
**Phone:** 573-592-5238
**Sanctioning Body:** NCAA Division III (with football)

Participants | Coaching Staff and Salaries | Revenues and Expenses | Supplemental Info

**Athletics Participation**

| | Number of participants as of the day of the first scheduled contest | |
|---|---|---|
| Varsity Teams | Men's Teams | Women's Teams |
| Baseball | 30 | |
| Basketball | 17 | 19 |
| Football | 83 | |
| Golf | 10 | |
| Soccer | 32 | 21 |
| Softball | | 13 |
| Tennis | 13 | 15 |
| Track and Field, Outdoor | 15 | 9 |
| Track and Field, X-Country | 10 | 9 |
| Volleyball | | 12 |
| Total Participants Men's and Women's Teams | 210 | 98 |
| Unduplicated Count of Participants (Number of individuals who participated on at least one varsity team.) | 188 | 82 |

CAVEAT






# Get data for one institution



**Step 1. Institution Search** (Redefine Search Criteria)
**Step 2. Select Institution** (Search Result)
**Step 3. View Data**

**Search Criteria**
- Institution name: 'Westminster College'
- Institution City: 'Fulton'
- Institution State: 'MO'

## Westminster College

**Unit ID: 179946**

### General Information

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Fulton, MO 65251-1299
Phone: 573-642-3361

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**Title:** Director, Institutional Research
**Phone:** 573-592-5238
**Sanctioning Body:** NCAA Division III (with football)

Participants | Coaching Staff and Salaries | Revenues and Expenses | Supplemental Info

**Head Coaches - Men's Teams**

| | Male Head Coaches | | | | Female Head Coaches | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Varsity Teams | Assigned to Team on a Full-Time Basis | Assigned to Team on a Part-Time Basis | Full-Time Institution Employee | Part-Time Institution Employee or Volunteer | Assigned to Team on a Full-Time Basis | Assigned to Team on a Part-Time Basis | Full-Time Institution Employee | Part-Time Institution Employee or Volunteer | Total Head Coaches |
| Baseball | | 1 | 1 | | | | | | 1 |
| Basketball | | 1 | 1 | | | | | | 1 |
| Football | 1 | | 1 | | | | | | 1 |
| Golf | | 1 | | 1 | | | | | 1 |
| Soccer | | 1 | 1 | | | | | | 1 |
| Tennis | | 1 | 1 | | | | | | 1 |
| Track and Field, Outdoor | | 1 | 1 | | | | | | 1 |
| Track and Field, X-Country | | 1 | 1 | | | | | | 1 |
| Coaching Position Totals | 1 | 7 | 7 | 1 | 0 | 0 | 0 | 0 | 8 |

CAVEAT

**Head Coaches - Women's Teams**

| | Male Head Coaches | | | | Female Head Coaches | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Varsity Teams | Assigned to Team on a Full-Time Basis | Assigned to Team on a Part-Time Basis | Full-Time Institution Employee | Part-Time Institution Employee or Volunteer | Assigned to Team on a Full-Time Basis | Assigned to Team on a Part-Time Basis | Full-Time Institution Employee | Part-Time Institution Employee or Volunteer | Total Head Coaches |
| Basketball | | | | | | 1 | 1 | | 1 |
| Soccer | | | | | | 1 | 1 | | 1 |
| Softball | | | | | | 1 | 1 | | 1 |
| Tennis | | 1 | 1 | | | | | | 1 |
| Track and Field, Outdoor | | 1 | 1 | | | | | | 1 |
| Track and Field, X-Country | | 1 | 1 | | | | | | 1 |
| Volleyball | | 1 | 1 | | | | | | 1 |
| Coaching Position Totals | 0 | 4 | 4 | 0 | 0 | 3 | 3 | 0 | 7 |

CAVEAT

**Head Coaches' Salaries**

| | Men's Teams | Women's Teams |
|---|---|---|
| Average Annual Institutional Salary per Head Coach | $27,378 | $23,988 |
| Number of Head Coaches Included in Average | 8 | 7 |
| Average Annual Institutional Salary per FTE | $52,149 | $44,188 |
| Number of FTEs Included in Average | 4.20 | 3.80 |

CAVEAT

**Assistant Coaches - Men's Teams**

| | Male Assistant Coaches | | | | Female Assistant Coaches | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Varsity Teams | Assigned to Team on a Full-Time Basis | Assigned to Team on a Part-Time Basis | Full-Time Institution Employee | Part-Time Institution Employee or Volunteer | Assigned to Team on a Full-Time Basis | Assigned to Team on a Part-Time Basis | Full-Time Institution Employee | Part-Time Institution Employee or Volunteer | Total Assistant Coaches |
| Baseball | | 1 | | 1 | | | | | 1 |
| Basketball | | 2 | | 2 | | | | | 2 |
| Football | | 7 | 2 | 5 | | | | | 7 |
| Golf | | | | | | | | | 0 |
| Soccer | | 1 | | 1 | | | | | 1 |
| Tennis | | | | | | | | | 0 |
| Track and Field, Outdoor | | 1 | | 1 | | | | | 1 |
| Track and Field,X-Country | | 1 | | 1 | | | | | 1 |
| Coaching Position Totals | 0 | 13 | 2 | 11 | 0 | 0 | 0 | 0 | 13 |

CAVEAT

**Assistant Coaches - Women's Teams**

| | Male Assistant Coaches | | | | Female Assistant Coaches | | | | |
|---|---|---|---|---|---|---|---|---|---|
| Varsity Teams | Assigned to Team on a Full-Time Basis | Assigned to Team on a Part-Time Basis | Full-Time Institution Employee | Part-Time Institution Employee or Volunteer | Assigned to Team on a Full-Time Basis | Assigned to Team on a Part-Time Basis | Full-Time Institution Employee | Part-Time Institution Employee or Volunteer | Total Assistant Coaches |
| Basketball | | 1 | | 1 | | | | | 1 |
| Soccer | | 1 | | 1 | | | | | 1 |
| Softball | | | | | | 1 | | 1 | 1 |
| Tennis | | | | | | | | | 0 |
| Track and field, Outdoor | | 1 | | 1 | | | | | 1 |
| Track and Field, X-Country | | 1 | | 1 | | | | | 1 |
| Volleyball | | | | | | 1 | | 1 | 1 |
| Coaching Position Totals | 0 | 4 | 0 | 4 | 0 | 2 | 0 | 2 | 6 |

CAVEAT

**Assistant Coaches' Salaries**

| | Men's Teams | Women's Teams |
|---|---|---|
| Average Annual Institutional Salary per Assistant Coach | $7,014 | $2,775 |
| Number of Assistant Coaches Included in Average | 13 | 6 |
| Average Annual Institutional Salary per FTE | $19,400 | $25,615 |
| Number of FTEs Included in Average | 4.70 | 0.65 |

CAVEAT

# Download data files



**Step 1. Institution Search** (Redefine Search Criteria)
**Step 2. Select Institution** (Search Result)
**Step 3. View Data**

**Search Criteria**

- Institution name: 'Westminster College'
- Institution City: 'Fulton'
- Institution State: 'MO'

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501 Westminster Ave
Fulton, MO 65251-1299
Phone: 573-642-3361

**Number of Full-time Undergraduates:** 1,016
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**Reporting Year:** 7/1/2013 - 6/30/2014
**Reporting Official:** Ray Brown
**Title:** Director, Institutional Research
**Phone:** 573-592-5238
**Sanctioning Body:** NCAA Division III (with football)

Participants | Coaching Staff and Salaries | Revenues and Expenses | Supplemental Info

**Athletically Related Student Aid**

| | Men's Teams | Women's Teams | Total |
|---|---|---|---|
| Total | $0 | $0 | $0 |
| Ratio (percent) | 0 | 0 | 100% |

CAVEAT

**Recruiting Expenses**

| | Men's Teams | Women's Teams | Total |
|---|---|---|---|
| Total | $14,952 | $6,876 | $21,828 |

CAVEAT

**Operating (Game-Day) Expenses by Team**

| | Men's Teams | | Women's Teams | | |
|---|---|---|---|---|---|
| | | Operating | | Operating | |

| Varsity Teams | Participants | Expenses per Participant | By Team | Participants | Expenses per Participant | By Team | Total Operating Expenses |
|---|---|---|---|---|---|---|---|
| Basketball | 17 | $2,447 | $41,592 | 19 | $1,959 | $37,227 | $78,819 |
| Football | 83 | $893 | $74,083 | | | | $74,083 |
| Baseball | 30 | $981 | $29,427 | | | | $29,427 |
| Golf | 10 | $469 | $4,687 | | | | $4,687 |
| Soccer | 32 | $1,367 | $43,744 | 21 | $1,170 | $24,566 | $68,310 |
| Softball | | | | 13 | $1,557 | $20,236 | $20,236 |
| Tennis | 13 | $637 | $8,283 | 15 | $637 | $9,557 | $17,840 |
| Track and Field, Outdoor | 15 | $993 | $14,891 | 9 | $1,135 | $10,211 | $25,102 |
| Track and Field,X-Country | 10 | $993 | $9,927 | 9 | $851 | $7,658 | $17,585 |
| Volleyball | | | | 12 | $1,799 | $21,583 | $21,583 |
| Total Operating Expenses Men's and Women's Teams | 210 | | $226,634 | 98 | | $131,038 | $357,672 |

CAVEAT

**Total Expenses by Team**

| Varsity Teams | Men's Teams | Women's Teams | Total |
|---|---|---|---|
| Basketball | $114,246 | $85,324 | $199,570 |
| Football | $257,371 | | $257,371 |
| Total Expenses of all Sports, Except Football and Basketball, Combined | $262,387 | $277,378 | $539,765 |
| Total Expenses Men's and Women's Teams | $634,004 | $362,702 | $996,706 |
| Not Allocated by Gender/Sport | | | $367,067 |
| Grand Total Expenses | | | $1,363,773 |

CAVEAT

**Total Revenues by Team**

| Varsity Teams | Men's Teams | Women's Teams | Total |
|---|---|---|---|
| Basketball | $114,246 | $85,324 | $199,570 |
| Football | $257,371 | | $257,371 |
| Total Revenues of all Sports, Except Football and Basketball, Combined | $262,387 | $277,378 | $539,765 |
| Total Revenues Men's and Women's Teams | $634,004 | $362,702 | $996,706 |
| Not Allocated by Gender/Sport | | | $367,067 |
| Grand Total for all Teams (includes by team and not allocated by gender/sport) | | | $1,363,773 |

CAVEAT

**Revenues and Expenses Summary**

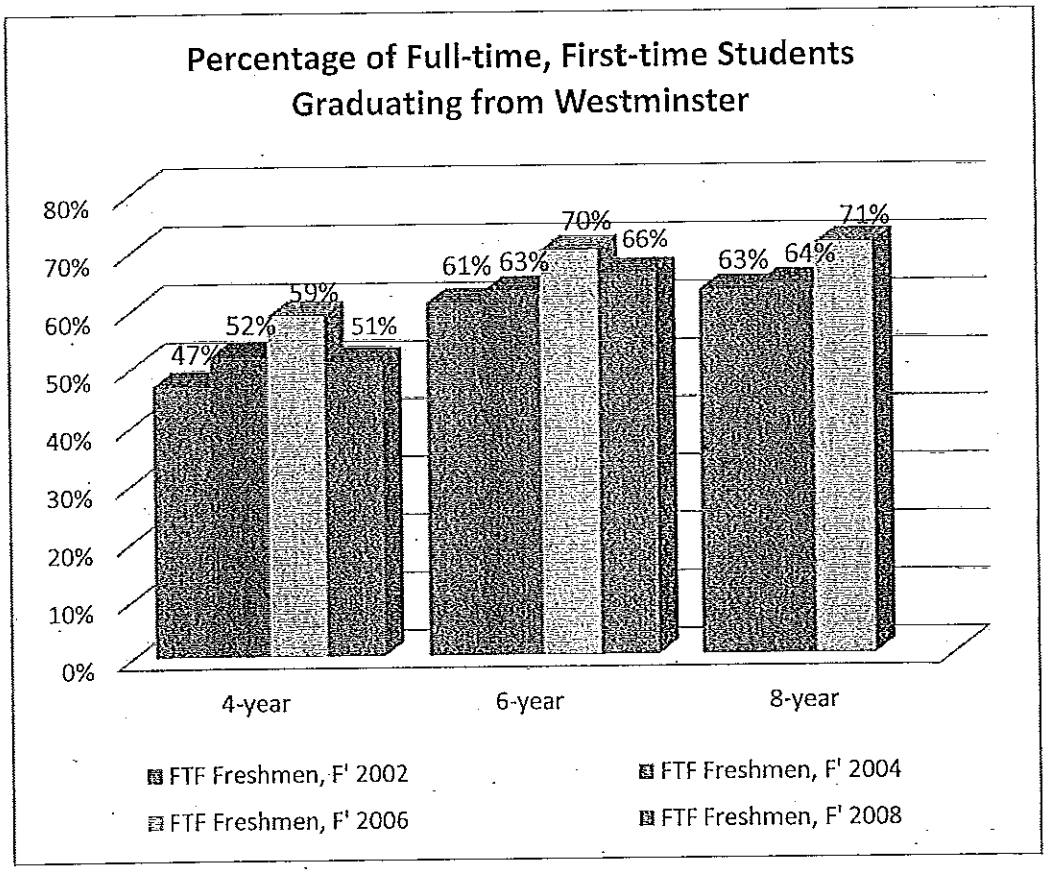
| | | Men's Teams | Women's Teams | Total |
|---|---|---|---|---|

| | | | | |
|---|---|---|---|---|
| 1 | Total of Head Coaches' Salaries | $219,024 | $167,916 | $386,940 |
| 2 | Total of Assistant Coaches' Salaries | $91,182 | $16,650 | $107,832 |
| 3 | Total Salaries (Lines 1+2) | $310,206 | $184,566 | $494,772 |
| 4 | Athletically Related Student Aid | $0 | $0 | $0 |
| 5 | Recruiting Expenses | $14,952 | $6,876 | $21,828 |
| 6 | Operating (Game-Day) Expenses | $226,634 | $131,038 | $357,672 |
| 7 | Summary of Subset Expenses (Lines 3+4+5+6) | $551,792 | $322,480 | $874,272 |
| 8 | Total Expenses for Teams | $634,004 | $362,702 | $996,706 |
| 9 | Total Expenses for Teams Minus Subset Expenses (Line 8 – Line 7) | $82,212 | $40,222 | $122,434 |
| 10 | Not Allocated Expenses | | | $367,067 |
| 11 | Grand Total Expenses (Lines 8+10) | | | $1,363,773 |
| 12 | Total Revenues for Teams | $634,004 | $362,702 | $996,706 |
| 13 | Not Allocated Revenues | | | $367,067 |
| 14 | Grand Total Revenues (Lines 12+13) | | | $1,363,773 |
| 15 | Total Revenues for Teams minus Total Expenses for Teams (Line 12-Line 8) | $0 | $0 | $0 |
| 16 | Grand Total Revenues Minus Grand Total Expenses (Line 14- Line 11) | | | $0 |

# GRADUATION RATE DISCLOSURE

Westminster College is pleased to provide information regarding our graduation/completion rates. The information is provided in compliance with the Higher Education Act of 1965, as amended. The rates reflect the graduation/completion status of students who enrolled during the 2007-08 academic year.

During the fall 2008 semester, 244 first-time, full-time, degree-seeking undergraduate students entered Westminster College. After 6 years (as of August 31, 2014), 162 or 66% of these students had graduated from our institution.

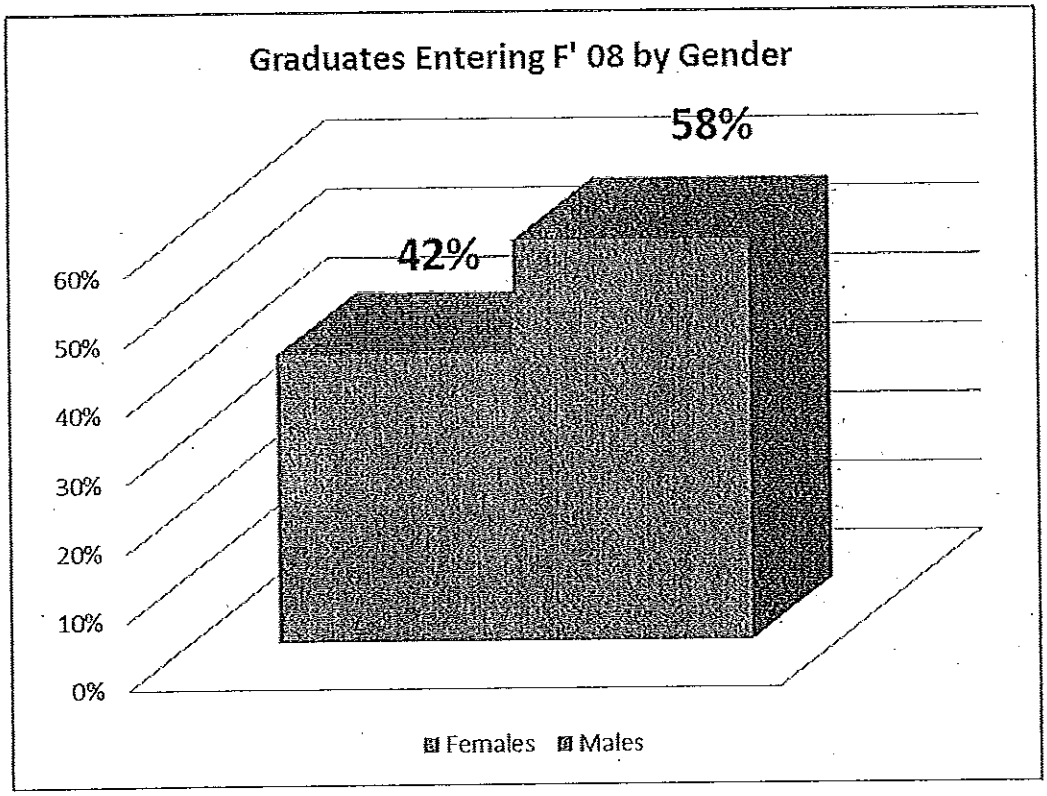



Questions related to this information should be directed to: Ray Brown, Director of Institutional Research, Westminster College at (573) 592-5238.

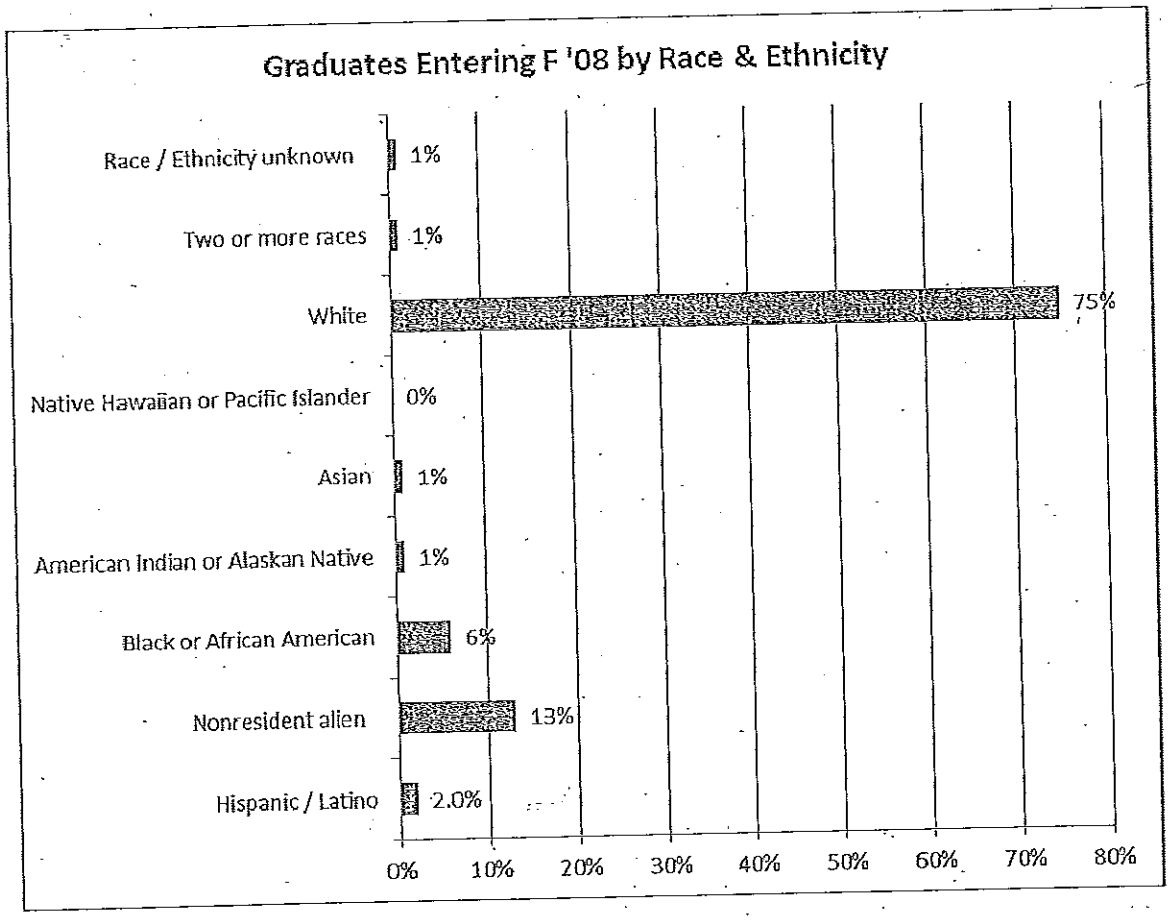
# DETAILED GRADUATION RATE DISCLOSURE

Westminster College is pleased to provide detailed information regarding our graduation rates. The information is provided in compliance with the Higher Education Act of 1965, as amended.

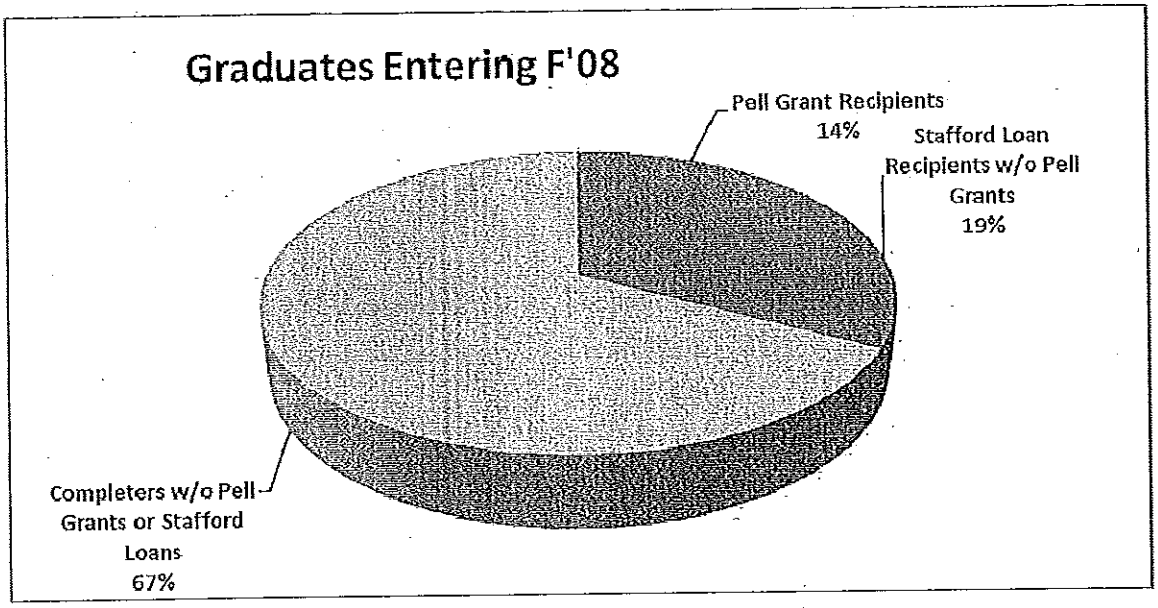
During the fall 2008 semester, 244 first-time, full-time, degree-seeking undergraduate students entered Westminster College. After 6 years (as of August 31, 2014), 66% of these students had graduated from our institution.



Twenty-five percent (25%) of the students entering Westminster as first time freshmen in fall 2008 who completed degrees self-reported as members of minority racial or ethnic groups.



One-third of the students entering Westminster as first time freshmen in fall 2008 who completed degrees received Pell Grants or Stafford Loans in their first year on campus.

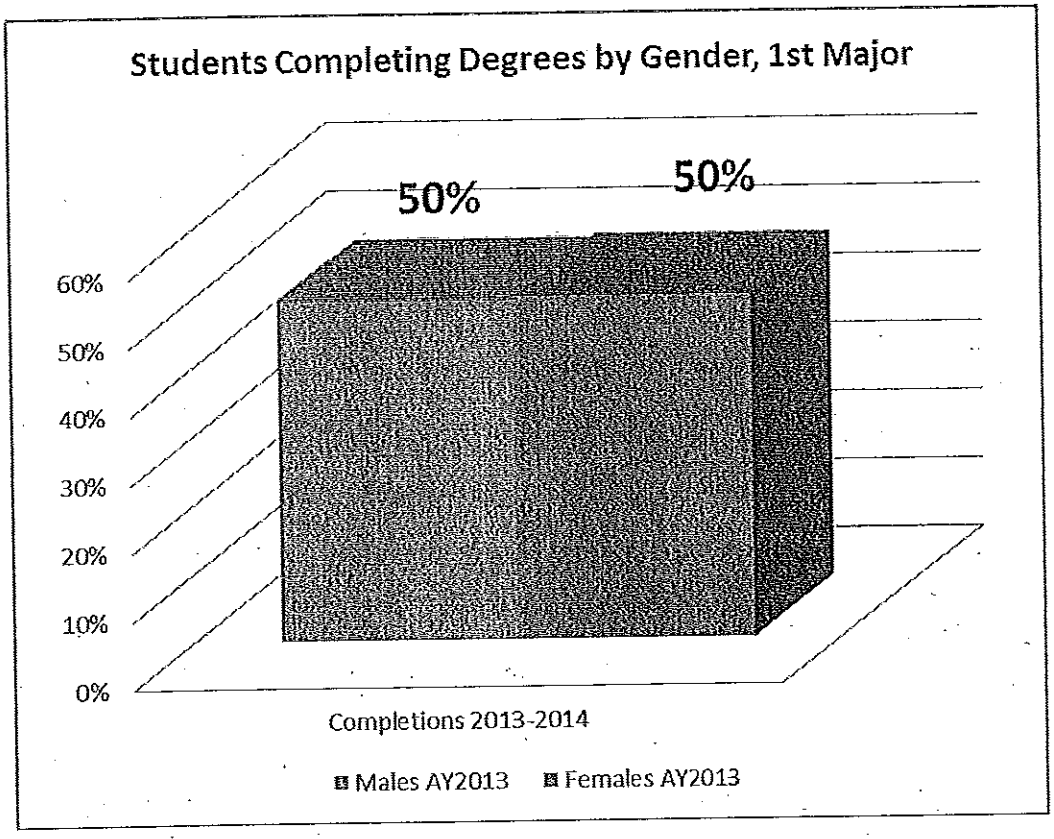



Questions related to this information should be directed to:
Ray Brown, Director of Institutional Research, Westminster College at (573) 592-5238.

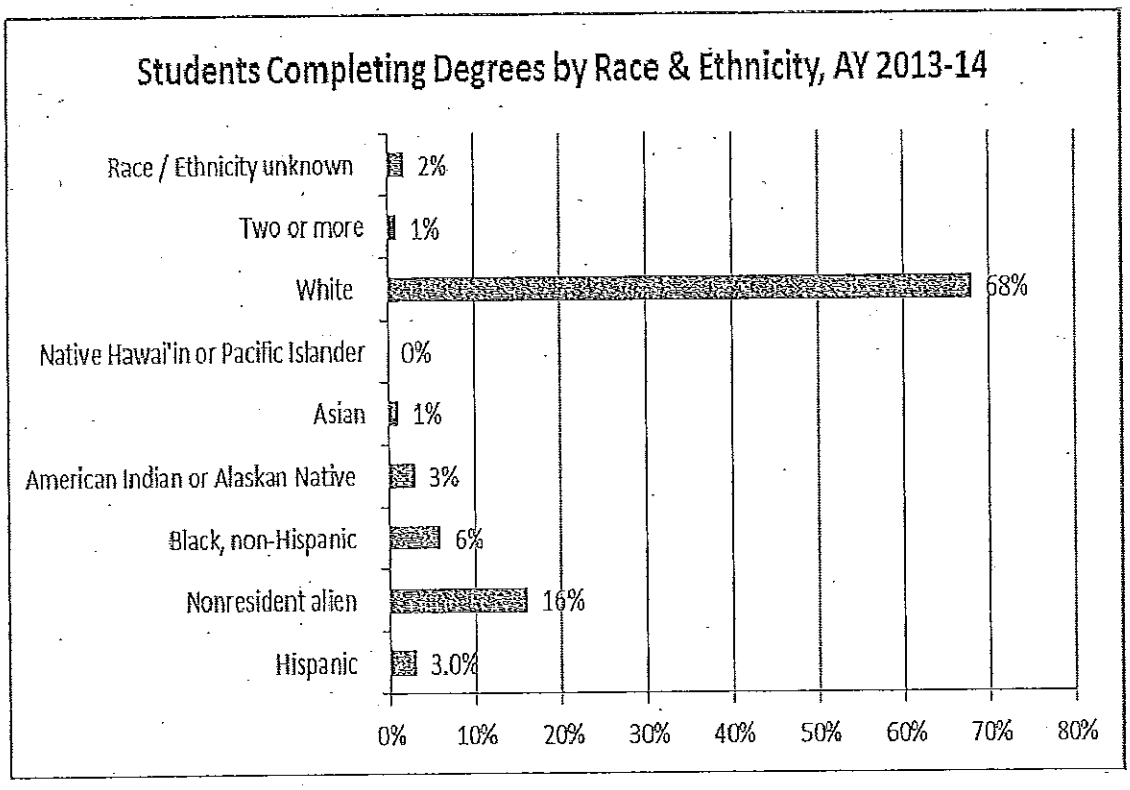
# DETAILED COMPLETION RATE DISCLOSURE

Westminster College is pleased to provide detailed information regarding our completion rates. The information is provided in compliance with the Higher Education Act of 1965, as amended.

Two hundred fifty-three students completed degree requirements at Westminster College during the 2013-2014 academic year. Of these, 126 were males and 127 were females.



Slightly less than one-quarter of the students completing degrees self-reported as members of minority racial or ethnic groups.




Questions related to this information should be directed to:
Ray Brown, Director of Institutional Research, Westminster College at (573) 592-5238.

## B. ENROLLMENT AND PERSISTENCE

B1 **Institutional Enrollment - Men and Women Provide numbers of students for each of the following categories as of the institution's official fall reporting date or as of October 15, 2014. Note: Report students formerly designated as "first professional" in the graduate cells.**

| | | FULL-TIME | | PART-TIME | |
|---|---|---|---|---|---|
| | | Men | Women | Men | Women |
| | **Undergraduates** | | | | |
| | Degree-seeking, first-time freshmen | 119 | 93 | | |
| | Other first-year, degree-seeking | | | | |
| | All other degree-seeking | 419 | 297 | 2 | 5 |
| | *Total degree-seeking* | 538 | 390 | 2 | 5 |
| | All other undergraduates enrolled in credit courses | 2 | 4 | | 3 |
| | *Total undergraduates* | 540 | 394 | 2 | 8 |
| | **Graduate** | | | | |
| | Degree-seeking, first-time | | | | |
| | All other degree-seeking | | | | |
| | All other graduates enrolled in credit courses | | | | |
| | *Total graduate* | 0 | 0 | 0 | 0 |
| | Total all undergraduates | | | | 944 |
| | Total all graduate | | | | 0 |
| | **GRAND TOTAL ALL STUDENTS** | | | | 944 |

B2 **Enrollment by Racial/Ethnic Category. Provide numbers of undergraduate students for each of the following categories as of the institution's official fall reporting date or as of October 15, 2014. Include International students only in the category "Nonresident aliens." Complete the "Total Undergraduates" column only if you cannot provide data for the first two columns. Report as your institution reports to IPEDS: persons who are Hispanic should be reported only on the Hispanic line, not under any race, and persons who are non-Hispanic multi-racial should be reported only under "Two or more races."**

| | | Degree-Seeking First-Time First Year | Degree-Seeking Undergraduates (include first-time first-year) | Total Undergraduates (both degree- and non-degree-seeking) |
|---|---|---|---|---|
| | Nonresident aliens | 30 | 153 | 153 |
| | Hispanic/Latino | 10 | 37 | 37 |
| | Black or African American, non-Hispanic | 20 | 75 | 75 |
| | White, non-Hispanic | 134 | 606 | 606 |
| | American Indian or Alaska Native, non-Hispanic | 6 | 21 | 21 |
| | Asian, non-Hispanic | 3 | 11 | 11 |
| | Native Hawaiian or other Pacific Islander, non-Hispanic | | | |
| | Two or more races, non-Hispanic | 4 | 11 | 11 |
| | Race and/or ethnicity unknown | 4 | 22 | 30 |
| | TOTAL | 211 | 936 | 944 |

### Persistence

B3 **Number of degrees awarded from July 1, 2013 to June 30, 2014**

| | | |
|---|---|---|
| | Certificate/diploma | |
| | Associate degrees | |
| | Bachelor's degrees | 253 |
| | Postbachelor's certificates | |
| | Master's degrees | |
| | Post-Master's certificates | |
| | Doctoral degrees – research/scholarship | |
| | Doctoral degrees – professional practice | |
| | Doctoral degrees – other | |

### Graduation Rates

The items in this section correspond to data elements collected by the IPEDS Web-based Data Collection System's Graduation Rate Survey (GRS). For complete instructions and definitions of data elements, see the IPEDS GRS instructions and glossary on the 2013 Web-based survey.

**For Bachelor's or Equivalent Programs**

Please provide data for the Fall 2007 cohort if available. If Fall 2007 cohort data are not available, provide data for the Fall 2006 cohort.

***Fall 2007 Cohort***

Report for the cohort of full-time first-time bachelor's (or equivalent) degree-seeking undergraduate students who entered in Fall 2007. Include in the cohort those who entered your institution during the summer term preceding Fall 2007.

| | | |
|---|---|---|
| B4 | Initial 2007 cohort of first-time, full-time bachelor's (or equivalent) degree-seeking undergraduate students; total all students: | 224 |
| B5 | Of the initial 2007 cohort, how many did not persist and did not graduate for the following reasons: death, permanent disability, service in the armed forces, foreign aid service of the federal government, or official church missions; total allowable exclusions: | |
| B6 | Final 2007 cohort, after adjusting for allowable exclusions: (subtract question B5 from question B4) | 224 |
| B7 | Of the initial 2007 cohort, how many completed the program in four years or less (by August 31, 2011): | 119 |
| B8 | Of the initial 2007 cohort, how many completed the program in more than four years but in five years or less (after August 31, 2011 and by August 31, 2012): | 29 |
| B9 | Of the initial 2007 cohort, how many completed the program in more than five years but in six years or less (after August 31, 2012 and by August 31, 2013): | 5 |
| B10 | Total graduating within six years (sum of questions B7, B8, and B9): | 153 |
| B11 | Six-year graduation rate for 2007 cohort (question B10 divided by question B6): | 68% |

***Fall 2006 Cohort***

Report for the cohort of full-time first-time bachelor's (or equivalent) degree-seeking undergraduate students who entered in Fall 2006. Include in the cohort those who entered your institution during the summer term preceding Fall 2006.

| | | |
|---|---|---|
| B4 | Initial 2006 cohort of first-time, full-time bachelor's (or equivalent) degree-seeking undergraduate students; total all students: | 278 |
| B5 | Of the initial 2006 cohort, how many did not persist and did not graduate for the following reasons: death, permanent disability, service in the armed forces, foreign aid service of the federal government, or official church missions; total allowable exclusions: | |
| B6 | Final 2006 cohort, after adjusting for allowable exclusions: (subtract question B5 from question B4) | 278 |
| B7 | Of the initial 2006 cohort, how many completed the program in four years or less (by August 31, 2010): | 163 |
| B8 | Of the initial 2006 cohort, how many completed the program in more than four years but in five years or less (after August 31, 2010 and by August 31, 2011): | 22 |
| B9 | Of the initial 2006 cohort, how many completed the program in more than five years but in six years or less (after August 31, 2011 and by August 31, 2012): | 10 |
| B10 | Total graduating within six years (sum of questions B7, B8, and B9): | 195 |

| | | |
|---|---|---|
| B11 | Six-year graduation rate for 2006 cohort (question B10 divided by question B6): | 70% |

**For Two-Year Institutions**

Please provide data for the 2010 cohort if available. If 2010 cohort data are not available, provide data for the 2009 cohort.

***2010 Cohort***

| | | |
|---|---|---|
| B12 | Initial 2010 cohort, total of first-time, full-time degree/certificate-seeking students: | |
| B13 | Of the initial 2010 cohort, how many did not persist and did not graduate for the following reasons: death, permanent disability, service in the armed forces, foreign aid service of the federal government, or official church missions; total allowable exclusions: | |
| B14 | Final 2010 cohort, after adjusting for allowable exclusions (Subtract question B13 from question B12): | 0 |
| B15 | Completers of programs of less than two years duration (total): | |
| B16 | Completers of programs of less than two years within 150 percent of normal time: | |
| B17 | Completers of programs of at least two but less than four years (total): | |
| B18 | Completers of programs of at least two but less than four-years within 150 percent of normal time: | |
| B19 | Total transfers-out (within three years) to other institutions: | |
| B20 | Total transfers to two-year institutions: | |
| B21 | Total transfers to four-year institutions: | |

***2009 Cohort***

| | | |
|---|---|---|
| B12 | Initial 2009 cohort, total of first-time, full-time degree/certificate-seeking students: | |
| B13 | Of the initial 2009 cohort, how many did not persist and did not graduate for the following reasons: death, permanent disability, service in the armed forces, foreign aid service of the federal government, or official church missions; total allowable exclusions: | |
| B14 | Final 2009 cohort, after adjusting for allowable exclusions (Subtract question B13 from question B12): | 0 |
| B15 | Completers of programs of less than two years duration (total): | |
| B16 | Completers of programs of less than two years within 150 percent of normal time: | |
| B17 | Completers of programs of at least two but less than four years (total): | |
| B18 | Completers of programs of at least two but less than four-years within 150 percent of normal time: | |
| B19 | Total transfers-out (within three years) to other institutions: | |
| B20 | Total transfers to two-year institutions: | |
| B21 | Total transfers to four-year institutions: | |

**Retention Rates**

Report for the cohort of all full-time, first-time bachelor's (or equivalent) degree-seeking undergraduate students who entered in Fall 2012 (or the preceding summer term). The initial cohort may be adjusted for students who departed for the following reasons: death, permanent disability, service in the armed forces, foreign aid service of the federal government or official church missions. No other adjustments to the initial cohort should be made.

| | | |
|---|---|---|
| B22 | For the cohort of all full-time bachelor's (or equivalent) degree-seeking undergraduate students who entered your institution as freshmen in Fall 2012 (or the preceding summer term), what percentage was enrolled at your institution as of the date your institution calculates its official enrollment in Fall 2013? | 78% |