



DEC 07 2021

Martina Fernandez-Rosario  
Division Chief  
U.S. Department of Education  
Federal Student Aid  
San Francisco/Seattle School Participation Division  
50 United Nations Plaza,  
Mailbox 1200, Suite 1273  
San Francisco, CA 94102

Re: Program Review Report  
OPE ID: 01536100  
PRCN: 202140930415

Hafa Adai Ms. Fernandez-Rosario,

Transmitted herewith is the Guam Community College's response to the findings presented in the Program Review Report, the corrective actions taken or currently in progress, as well as the supporting evidence (Appendices).

Should you have any questions or require additional information, please contact me at

[mary.okada@guamcc.edu](mailto:mary.okada@guamcc.edu) or (671) 735-5700.

Sincerely,

A handwritten signature in blue ink that reads 'Mary A. Y. Okada'.

Mary A. Y. Okada, Ed.D.  
President



Guam Community College (GCC) received the USDOE Federal Student Aid Program Review Report dated November 8, 2021 via email on November 9, 2021. The College exercises due care to comply with regulations and take seriously the concerns raised by the review team. GCC submits the following response and correction action plan to address the findings contained in the Program Review Report.

### **Finding 1: Ineligible Program- Bachelor's Degree**

Shortly after the Accrediting Commission for Community and Junior Colleges' (ACCJC) approval of the Bachelor of Science degree in Career and Technical Education (BS CTE) program in January 2020, GCC and the entire island of Guam went on lockdown in March 2020 due to the coronavirus pandemic for several months. A few months later, GCC unfortunately lost a senior executive (Vice President for Financial Affairs) in May 2020. This was a significant loss to the institution and members of the Finance and Administration continued to carry out, to the best of their abilities, the function of their respective department. Shortly thereafter, as the college began recruiting for the Fall 2020 semester, GCC started offering the bachelor's degree program, which is a higher level than the College's usual offerings of associate degrees and certificate programs.

On September 13, 2021, GCC requested approval for the BS CTE program to the U.S. Department of Education (USDOE) via its submission of the electronic application [**Appendices 1.A and 1.A.1**]. GCC awaits the Department's approval of the BS CTE program [**Appendix 1.B**]. GCC attests that it has not disbursed any additional Title IV aid to students in the program since the program review. As part of its response, GCC is providing a spreadsheet of the Title IV funds disbursed to each student in the BS CTE program by terms (payment periods) [**Appendix 1.C**]. GCC is currently awaiting approval of the BS CTE program.

### **Finding 2: Return to Title IV (R2T4) Calculation Errors**

GCC reviewed the information and calculation for each of the four cited students. All four students withdrew as a result of the COVID-19 interruptions. GCC is providing the revised R2T4 calculations for these students and the related COD adjustments [**Appendices 2.A through 2.D**], the electronic calculation parameters [**Appendix 2.E**], and the revised policy and procedures related to R2T4 calculations and timely refunds [**Appendix 2.F**]. The Board of Trustees Policy 240 Student Financial Aid, which proposes to adopt this policy and procedures, has been reviewed and approved by the College Governing Council on December 2, 2021 and now awaits Board of Trustees' approval at their upcoming meeting on December 17, 2021 [**Appendix 2.G**]. Once approved, the revised policy and procedures can be found on our website at <https://guamcc.edu/financialaid>.

### **Finding 3: Crime Awareness Requirements Not Met**

GCC timely submits and posts the required campus crime statistics annually, which can be found under Clery Act Reports within the Public Reports page of our website (<https://www.guamcc.edu/Publications>). GCC was made aware that it had not fully complied with the Clery Act during the program review. GCC acknowledges the seriousness of the violation and immediately took corrective actions necessary to meet certain Clery Act requirements. On October 1, 2021, the College posted its 2021 Annual Security Report (ASR) on

[https://guamcc.edu/sites/default/files/annual\\_security\\_report\\_september\\_2021\\_2.pdf](https://guamcc.edu/sites/default/files/annual_security_report_september_2021_2.pdf). [**Appendices 3.C and 3.D**] Upon receiving the Program Review Report, GCC took additional required actions identified in the report.

GCC submits its revised 2021 ASR which includes all of the statistical disclosures and policy, procedure, and programmatic information required under 34 C.F.R. § 668.46(b) [**Appendix 3.A**]. GCC submits evidence that it has distributed its new 2021 ASR to all current students and employees by posting an announcement to the GCC community on MyGCC in accordance with 34 C.F.R. § 668.41(e) [**Appendix 3.B**].

GCC reviewed and revised its Board of Trustees policies and resolutions related to campus safety [**Appendices 3.E through 3.M**]. The policies marked “Revised” are currently undergoing review through the College’s governance process, which includes presentation to the Board of Trustees for their review and approval of the changes.

<b>Policy / Resolution</b>	<b>Reviewed/Revised</b>	<b>Appendix</b>
BOT Policy 165 Compliance with Americans with Disabilities Act	Reviewed, no change	3.E
BOT Policy 170 Campus Crime and Security - ongoing governance process	Revised	3.F
BOT Policy 171 Violence Prevention in the Workplace	Reviewed, no change	3.G
BOT Policy 172 Pandemic Response Plan	Reviewed, no change	3.H
BOT Policy 175 Tobacco, e-Cigarette, and Betel Nut- Free Campus	Reviewed, no change	3.I
BOT Policy 180 Risk Crisis Management and Emergency Protocol	Revised	3.J
BOT Policy 185 Sexual Harassment and Discrimination	Revised	3.K
BOT Policy 410 Standards of Conduct Regarding Drugs and Alcohol	Revised	3.L
BOT Resolution 7-2013 Active Shooter on Campus Response Plan	Reviewed, no change	3.M

GCC also revised its ASR policy and procedures regarding the preparation, publication, and distribution of its ASR to ensure that all aspects of the ASR process are carried out in accordance with the Clery Act [**Appendix 3.N**].

**CERTIFICATION STATEMENT:** GCC certifies that the ASR was distributed in accordance with the Clery Act. Further, GCC understands its Clery Act obligations and has taken all necessary corrective actions to ensure that these violations do not recur [**Appendix 3.O**].

**Finding 4: Drug and Alcohol Abuse Prevention Program (DAAPP) Requirements Not Met**

GCC has developed and is in the process of implementing a comprehensive Drug and Alcohol Abuse Prevention Program (DAAPP). At GCC, this program is also referred to as the Substance Abuse Prevention Program. The DAAPP is designed to prevent the unlawful possession, use, and distribution of drugs and alcohol on campus and at recognized events and activities in accordance with DFSCA and the Department’s Part 86 regulations.

John Payne, Program Specialist and Accommodative Service Coordinator, leads GCC's DAAPP. Members of the DAAPP are Associate Dean Gerald Cruz; faculty member Dr. Deborah Ellen, Chairperson, Education; Kimberly Bautista, Administrative Aide; and two student government representatives. Members of the program now meet at least once a month to review the ways that the College addresses drug and alcohol abuse concerns on campus, and to ensure that moving forward, GCC is in compliance with all DAAPP requirements.

DAAPP members will conduct a comprehensive biennial review of GCC's drug and alcohol prevention-related initiatives (educational and enforcement-related) to determine the effectiveness of its DAAPP and institutional policies against students and employees found to be in violation. The results of the biennial review and the data findings will be included as part of GCC's DAAPP annual disclosure.

GCC submits its draft DAAPP disclosure [**Appendix 4.A**]. Upon receiving the Department's approval, GCC intends to send the disclosure annually to its students and employees, which includes contents related to laws, dangers of abuse, policies, disciplinary and other procedures, educational initiatives, treatment options, and resources. Once GCC begins its biennial comprehensive review, it will also include the data findings as part of the annual DAAPP disclosure. GCC also submits its procedures [**Appendix 4.B**].

**CERTIFICATION STATEMENT:** GCC certifies that it understands and is committed to fulfilling all DAAPP obligations and is taking all necessary corrective actions and doing so as expediently as possible. Further, GCC commits that these violations do not recur.

#### **Finding 5: Inadequate Reporting to the Common Origination and Disbursement (COD) System**

GCC already made the required corrections and no further action was required for this finding.

#### **Finding 6: Inaccurate Enrollment Reporting to the National Student Loan Data System (NSLDS)**

GCC reports enrollment data to the NSLDS via our third-party servicer National Student Clearinghouse in a timely manner. However, the Department identified discrepancies with the data sent to NSLDS, which then required a more thorough review by GCC.

**CERTIFICATION STATEMENT:** GCC certifies that it has reviewed and made the appropriate corrections for the cited students. GCC submits evidence of the corrections made to the cited students' statuses as required in the report [**Appendices 6.A through 6.F**]. GCC also certifies that it reviewed all of its students' NSLDS enrollment statuses from 2019-2020 to current and made the appropriate corrections.

In addition, GCC revised its NSLDS reporting procedures to ensure that accurate information is reported to NSLDS in a timely manner and in accordance with the regulations cited in this finding [**Appendix 6.G**].

#### **Finding 7: Inadequate Policies and Procedures for Verification, Disbursement and Credit Balances**

GCC has processes in place to verify information contained in a student aid application as well as processes to notify its students that they have been selected for verification. However, the program reviewers determined the verification worksheet and the "Applying for Financial Aid" checklist that are provided to students did not meet the requirements of applicable federal regulations.

GCC developed its written Verification Policy and Procedures [**Appendix 7.A**], Financial Aid Disbursement Policy [**Appendix 7.B**], and Tuition Refund & Credit Balance Policy and Procedures [**Appendix 7.C**]. Board of Trustees Policy 240 Student Financial Aid, which proposes to adopt these policies and procedures, has been reviewed and approved by the College Governing Council on December 2, 2021 and now awaits Board of Trustees' approval at their upcoming meeting on December 17, 2021 [**Appendix 2.G**]. Once approved, these policies and procedures may be found on our website at <https://guamcc.edu/financialaid>.

### **Finding 8: Consumer Information Requirements Not Met**

The required consumer information were posted in various areas of the GCC website (<https://guamcc.edu/financialaid>), GCC Catalog AY 2020-2021 ([https://guamcc.edu/sites/default/files/2020-2021\\_gcc\\_catalog\\_v16\\_11.06.2020a\\_0.pdf](https://guamcc.edu/sites/default/files/2020-2021_gcc_catalog_v16_11.06.2020a_0.pdf)) and AY 2019-2020 ([https://guamcc.edu/sites/default/files/2019-2020\\_gcc\\_catalogv7\\_10.21.2019.pdf](https://guamcc.edu/sites/default/files/2019-2020_gcc_catalogv7_10.21.2019.pdf)). GCC took immediate corrective actions, such as the creation of a separate publicly accessible Consumer Information page (<https://guamcc.edu/ConsumerInformation>) and posted all required disclosures including institutional the completion and graduation rates data for certificate or degree-seeking first-time, full-time undergraduate students; student body diversity; and net price calculator [**Appendix 8.A**].

On December 2, 2021, an announcement was posted to MyGCC relative to the availability of consumer information with a link to the newly created Consumer Information page and a statement that a paper copy of the consumer information may be requested [**Appendix 8.B**]. In addition, an email notification was sent out to current students on December 3, 2021 [**Appendices 8.C and 8.D**].

For the required institutional policies and sanctions related to copyright infringement, GCC is providing the draft policy and procedures which is currently undergoing review through the College's governance process, including presentation to the Board of Trustees for their review and approval of the changes [**Appendices 8.E and 8.F**].

Additionally, GCC is submitting its consumer information- related procedures, which addresses the information that will be disclosed, how the information will be gathered, and how the institution will ensure that the information remains current [**Appendix 8.G**].