



April 26, 2010

William N. Johnston, Ed.D.
President
Wesley College
120 North State Street
Dover, DE 19901-3875

Certified Mail
Return Receipt Requested
7006 3450 0000 1573 6692

RE: Final Program Review Determination
OPE ID: 00143300
PRCN: 200640326783

Dear President Johnston:

As you know, the U.S. Department of Education's Philadelphia School Participation Team conducted a program review of Wesley College's (Wesley; the College) 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). This program review focused on the College's compliance with the requirements of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act. Wesley's official response was dated October 13, 2006.

Purpose:

Final determinations have been made concerning all of the violations and concerns identified during the program review. The purpose of the attached Final Program Review Determination (FPRD) letter is to advise the College of the Department's final determinations and to explain the additional action steps that are needed to resolve and close the program review.

Due to the serious nature of the violations identified during the program review, this FPRD is being referred to the Administrative Actions and Appeals Division (AAAD) for consideration of possible adverse administrative action. Such action may include a fine, or the limitation, suspension or termination of the Title IV eligibility of the College pursuant to 34 C.F.R. Part 668, Subpart G. If AAAD initiates any action, a Wesley will receive a separate notification that provides information on appeal rights and procedures for filing an appeal.

Federal Student Aid - School Participation Team - NE
The Wanamaker Building
100 Penn Square East, Suite 511
Philadelphia, PA 19107-3323
www.FederalStudentAid.ed.gov

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While the College may not appeal this Final Determination, Wesley will have full appeal rights in the event that AAAD initiates an adverse administrative action as a result of the violations of the Clery Act identified in this FPRD.

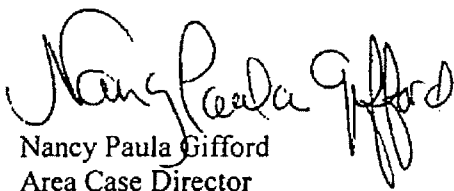
Upon completion of the “Supplemental Corrective Measures” outlined in Section E of this FPRD, the program review will be closed.

Record Retention:

Program records relating to the period covered by this program review must be retained until the later of: resolution of the violations, weakness, and other issues identified during the program review or the end of the retention period applicable to Title IV-related records under 34 C.F.R. § 668.24 (e)(1) and (e)(2).

We would like to express our appreciation for the courtesy, cooperation and patience shown to us throughout the program review process. If you have any questions about this FPRD or the program review process, please contact Mr. James L. Moore, III on (215) 656-6495.

Sincerely,



Nancy Paula Gifford
Area Case Director

Attachment as Stated

cc: Mr. Walter Beaupre, Director, Office of Safety and Security, Wesley
Mr. Eric Nelson, M.B.A., V.P. of Finance and Director of Human Resources, Wesley
Mr. J. Michael Hall, M.B.A., Financial Aid Manager, Student Financial Planning, Wesley
Elizabeth Sibolski, Ph.D., President, Middle States Association – CHE
Ms. Maureen Laffey, Director, Delaware Higher Education Commission

Prepared for

Wesley College



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FEDERAL STUDENT AID

OPE ID: 00143300

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Prepared by

U.S. Department of Education

Federal Student Aid

School Participation Team –Philadelphia

Final Program Review Determination

April 26, 2010

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A. Institutional Information

Wesley College
120 North State Street
Dover, DE 19901-3875

Type: Private, Non-Profit

Highest Level of Offering: Master's Degree

Accrediting Agency: Middle States Association of Colleges and Schools

Current Total Student Enrollment: 2,500 (Approx. Fall 2008)

% Of Students Receiving Title IV: 80% (Approx.)

Title IV Funding Levels:

	<u>2006-2007</u>	<u>2007-2008</u>	<u>2008-2009</u>
Federal Pell Grant Program	\$ 1,268,776	\$ 1,638,447	\$ 1,926,298
Federal Family Education Loan Program	\$ 11,759,099	\$ 12,384,845	\$ 14,430,509
Fed. Supp. Educ. Opp. Grant Program	\$ 195,485	\$ 233,333	\$ 266,667
Federal Work Study Program	\$ 217,428	\$ 353,909	\$ 550,601
Federal Perkins Loan Program	\$ 98,800	\$ 97,200	\$ 121,250
Fed. Acad. Competiveness Grant Prog.	\$ 28,550	\$ 47,775	\$ 40,776
Total	\$ 13,568,138	\$ 14,755,509	\$ 17,336,101

Federal Family Education Loan Program Default Rate:

<u>Cohort Year</u>	<u>Rate</u>
2007	10.4%
2006	5.7%
2005	3.9%

Federal Perkins Loan Program Default Rate:

<u>Year Ending</u>	<u>Rate</u>
6/30/2007	17.6%
6/30/2006	19.7%
6/30/2005	12.5%

Founded in 1873, Wesley College (Wesley; the College) offers programs of study in more than 30 academic fields. The main campus, located in the City of Dover, is situated

on 50 acres and includes 19 buildings. The Wesley has additional locations in New Castle, DE and at Dover Air Force Base. As of Fall 2008, approximately 2,100 students were enrolled at the main campus while an additional 400 students attended the additional locations. Wesley maintains an Office of Safety and Security (OSS), which provides a 24/7 presence on campus. Security officers do not have law enforcement powers and therefore are not authorized to carry weapons or make arrests. Wesley officials state that the OSS has an excellent working relationship with Federal, state, and local, law enforcement agencies.

B. Background

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act) requires all institutions that receive Title IV funding to provide accurate and complete campus crime information to their students and employees. Each year, institutions must prepare, publish, and distribute an annual campus security report (CSR). The Clery Act requires the disclosure of crime statistics and dissemination of information about campus safety policies, procedures, programs, and protocols that prepare members of the campus community to be well-informed consumers and employees. The Clery Act also requires institutions to notify students and employees of reported crimes and current threats on an ongoing basis by maintaining an open daily crime log and issuing timely warnings. Institutions have an obligation to provide current and prospective members of the campus community with accurate, complete, and timely information about campus safety. Access to such information allows community members to make informed decisions about their educational and employment choices and to take an active role in their personal safety and to protect their personal property.

On May 5, 2006, Security on Campus, Inc. (SOC) filed a complaint with the U.S. Department of Education (the Department) alleging that Wesley College had violated several provisions of the Clery Act. This complaint was filed on behalf of a group of Wesley students, including students associated with the College's newspaper, *The Whetstone*. The complaints alleged that Wesley failed to issue a timely warning in response to a forcible sex offense that occurred on February 12, 2006, when a female student reported to Wesley's OSS that she had been raped by an acquaintance in her Carpenter Hall room. OSS subsequently notified the Dover Police Department. The accused student was arrested three days later on-campus. The campus community learned of the incident through a local newspaper. *The Whetstone* reporters alleged they were denied access to the daily crime log and that the events pertaining to the incident were not disclosed by the College. Institutional officials cited limitations imposed by the Federal Educational Records Privacy Act (FERPA) as the reason for not disclosing the incident. Student journalists also noted that the incident was not documented in the daily crime log as required by the Clery Act. Finally, the complaint stated that certain required policy disclosures were not included in the CSR.

As the agency charged with enforcement of the Clery Act, the Department conducted a program review to evaluate the allegations raised by the complainants.

C. Scope of Review

The Department conducted an off-site focused program review of Wesley's compliance with the Clery Act. Wesley was notified of the initiation of the review in a letter dated September 13, 2006. The Department's letter explained the allegations and the Clery Act requirements. The letter also required Wesley to submit a comprehensive response to the allegations as well as specific information regarding its safety and security programs. Wesley submitted its initial response on October 13, 2006. Throughout the program review process, supplemental information was requested by the Department and provided by the complainants and the College. Mr. James L. Moore, III, Senior Institutional Review Specialist, conducted the review.

The focus of the review was to evaluate Wesley's compliance with the Clery Act. For more detail on the statutory requirements, please see § 485(f) of the Higher Education Act of 1965, as amended (HEA), 20 U.S.C. §1092(f). The Department's implementing regulations can be found at 34 C.F.R. § 668.41-668.46.

During the review, we analyzed all the materials that were submitted by SOC in support of the complaint and by Wesley. We have completed our analysis and are issuing this Final Program Review Determination (FPRD) letter to advise the College of the Secretary's final disposition of this matter.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning Wesley College's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve Wesley of its obligation to comply with all of the statutory and/or regulatory provisions governing the Title IV, HEA programs.

D. Findings and Final Determinations

The purpose of this letter is to: (1) advise Wesley of the Department's final determinations regarding violations of the Clery Act; (2) provide instructions regarding additional corrective actions needed to bring Wesley's operations into compliance with the Clery Act; (3) provide information regarding next steps; and, (4) close the program review, subject to the satisfactory completion of the requirements outlined in Section E of this FPRD.

This section identifies the findings of the program review and the Department's final determinations. The findings and the final determinations are based on a thorough examination of records gathered during the program review including the College's official response.

**Finding # 1: Failure to Issue “Timely Warnings” in Accordance with
Federal Regulations**

Citation:

For purposes of crime prevention, institutions must issue timely warnings to students and employees to inform them of reported crimes that pose a threat to the health and safety of the campus community. See §485(f)(3) of the HEA. These warnings must be issued to the campus community in any case where an incident of crime listed in 34 C.F.R. § 668.46 (c)(1) or (c)(3) that represents a threat to students or employees is reported to a campus security authority. 34 C.F.R. § 668.46 (e). In addition, institutions are required to include a number of detailed policy statements in the annual campus security report. 34 C.F.R. § 668.46 (b)(2). The policy statements must include the institution’s policy for the issuance of timely warnings and clear notice of the procedures that students and other must follow to report crimes and other emergencies that occur on campus. 34 C.F.R. § 668.46 (b)(2)(i).

Noncompliance:

Wesley did not issue a timely warning in response to a forcible sex offense that occurred on February 12, 2006 when a female student reported that she had been raped by an acquaintance in her Carpenter Hall room. Wesley’s Office of Safety and Security subsequently notified the Dover Police Department (DPD) about the incident. DPD investigated and arrested the accused student three days later on the Wesley campus. The following is a timeline of major events:

February 12, 2006: The assault occurs in the early morning hours. Later the same day, the victim reports the incident to OSS. An incident report is taken and the complainant provides a detailed statement of the events. Wesley security officials immediately determine that the complainant is a victim of a sexual assault. She is taken to Kent General Hospital where a sexual assault kit is administered and additional medical testing and evaluations are performed. The Dover Police Department and victims services officials are contacted.

February 13, 2006: The assailant contacts the complainant by instant message. In a series of messages, the complainant expresses anger, fear and pain that were brought on by the attack. The assailant substantively confesses to the commission of the crime via instant message.

February 12 -15, 2006: The assailant continues to live in a residence hall and was free to move about the campus.

February 15, 2006: The assailant is arrested by DPD officers on a charge of rape in the second degree, a Class B felony in the State of Delaware.

February 16, 2006: A report prepared by Wesley’s counseling staff is sent to the College’s Dean of Students. The report notes that the incident did not appear to be a case of regret sex or in any sense a consensual sex act but rather was a violent sex-based attack.

February 20, 2006: The alleged assailant is formally dismissed from Wesley College.

On these facts, Wesley should have issued a timely warning on February 12, 2009. As of that date, Wesley's Dean of Students or officials acting on his behalf were the only persons permitted to issue timely warnings.

Wesley's response to the Department asserts that, "Wesley's Dean of Students investigated the February 12 incident by, *inter alia*, speaking to the victim and the accused student." However, our examination indicates that these interviews were conducted as part of a disciplinary proceeding. That proceeding did not begin until February 15, 2006, the same day that the assailant was arrested by the Dover Police Department. Moreover, nothing in the facts or the records presented by Wesley indicate that the College collected or evaluated any information for the express purpose of determining if it was necessary to issue a timely warning on February 12, 2006.

The campus community was not notified of the sexual assault that occurred on February 12, 2006 through any timely warning issued by Wesley College rather campus community members learned of the incident through reporting in the local newspaper. In response to student and employee concerns, the Dean of Students, speaking to representatives from *The Whetstone*, asserted that there were legal constraints on any disclosure. In published reports, the Dean of Students claimed that FERPA prohibited any release of information.

The complaint and published reports noted that neither students nor staff members including those who lived and worked in the hall where the incident occurred or in the hall where the accused lived were notified about the events. Several students expressed their concern in the campus newspaper, *The Whetstone*. The *Whetstone's* managing editor wrote a commentary for the March edition, which included the following: "Like most students and area residents, I didn't learn about the rape until I read about it in the Dover Post...I find it a disservice to the students, particularly the women, that the Wesley administration gave no report of the incident (by explaining the nature of the violent attack through email, voicemail, flier, or proclamation)...Quite frankly, the fact that no outstanding reaction[s]...have been initiated leaves me with the distinct impression that the administration is desperate to conceal and/or dismiss the incident, rather than work to ameliorate it...I would personally rather be informed so that I may take the necessary precautionary steps to protect myself, since the school feels no inclination."

In a response to SOC and in its official response to the Department, the College did not stress the FERPA argument but focused instead on its position that there was no "continuing threat" posed by the perpetrator's continued presence on campus. The College asserted that the perpetrator was subsequently banned from the campus and noted that the ban covered the retrieval of personal property, which could only be done under the supervision of the Dover Police Department.

This incident did pose a clear and ongoing threat to the health and safety of the campus community and therefore, a timely warning should have been issued. For these reasons, the

Department has determined that Wesley did not act reasonably or within the discretion granted to institutions with regard to the issuance of timely warnings.

Moreover, FERPA only regulates the release of educational records and information and never limits an institution's ability to issue timely warnings. The timely warning required by the Clery Act and the Department's regulations does not require disclosure of records and information protected by FERPA.

Failure to issue timely warnings of serious and/or on-going threats deprives members of the campus community of vital, time-sensitive crime information, denies members the opportunity to take adequate steps to provide for their own safety, and effectively negates the Act's intent.

To ensure adequate corrective actions are taken before the publication of the next CSR due October 1, 2010, Wesley is required to undertake the "Supplemental Corrective Measures" set forth in Section E of this FPRD.

**Finding # 2: Failure to Maintain Daily Crime Log in Accordance with
Federal Regulations**

Citation:

Institutions with a police or campus security department must maintain "a written, easily understood daily crime log" listing all crimes that occurred: 1) on campus, including residence halls; 2) in a non-campus buildings or on non-campus property; 3) on public property; or 4) within the campus police or security department's patrol area that it becomes aware of or are reported to it. This reporting requirement applies to all crimes, not merely those crimes listed in 34 C.F.R. §668.46 (c)(1) and (3). The crime log must include the nature, date, time, general location, and disposition of each reported offense. The crime log must be kept up to date and be freely accessible to any requestor. 34 C.F.R. § 668.46 (f).

Noncompliance:

Wesley College failed to maintain an accurate, complete, and open daily crime log in accordance with the Department's regulations. This finding is based on the Department's examination of materials submitted in support of SOC's complaint including representations by student journalists who assert that they were denied access to the crime log. Additionally, the Department has acquired other records and published reports that indicate that the College did not comply with the crime log requirements during the review period.

These materials include an April 20, 2006 e-mail written by the Dean of Students that stated, "the Office of Safety and Security will immediately develop a daily crime log reporting the date, nature, and location of the crime. This log will be made available to the public upon request. Training concerning the release of this log will be provided to

all officers.” The same message also stated that, “The incident was reported in our daily log including the names of both the alleged victim and the accused. Consequently, to release that security log would have violated the victim’s confidentiality. The format of the daily crime log, which will be implemented immediately, will enable us to release important information should there be such requests.” These messages strongly indicate that no Clery Act-compliant crime log was readily available prior to the filing of the complaint and supports the representation of the student journalist who requested access to the log.

In its official response, the College stated in part that,

“At the time of the February 12 incident, Wesley maintained a Clery-complaint crime log. Following the February 12 incident a student journalist asked a College Security Officer to view the log. The officer mistakenly, did not direct the journalist to the daily crime log. Instead, he – believing he was complying with the mandates of FERPA – refused the journalist access to the incident report, which contained the victim’s name. After the initial denial, the student journalist made no further request or inquiry...Both before and after the February 12 incident, the College maintained and permitted access to its daily crime log in full compliance with the Clery Act and its regulations. Further, since the February 12 incident, the College has provided additional instruction to its security officers on Clery Act requirements.”

Moreover, the Department has determined that it was incumbent on the College to contact the student journalist and ensure that access to the log was granted. More importantly, the numerous public statements and explanations, especially by the Dean of Students, make clear that a Clery-compliant daily crime log was not in place prior to the filing of the complaint that gave rise to this program review. For these reasons, the Department has determined that Wesley College was not in compliance with the open daily crime log requirement.

The Clery Act is first and foremost a consumer information law intended to provide students, employees, and other stakeholders with vital information that they can use to make good safety decisions and effectively assist in providing for their own security. The crime log is especially important because it provides more timely information that supplements the long-view trend data in the CSR’s statistical disclosures. Failure to comply with the daily crime log requirements deprives the campus community of this critical information and serves to negate the intent of the Act.

To ensure adequate corrective actions are taken before the publication of the next CSR due October 1, 2010, Wesley is required to undertake the “Supplemental Corrective Measures” set forth in Section E of this FPRD.

Finding # 3: Omission of Required Policy Statements & Improper Formatting of Campus Security Reports

Citation:

The Clery Act and the Department's regulations require institutions to include several policy statements in their campus security reports. These disclosures are intended to inform the campus community about the institution's security policies, procedures and programs and the availability of resources and channels of recourse. In general, these policies include topics such as the law enforcement authority and practices of campus police and security forces, incident reporting procedures for students and employees, and policies that govern the preparation of the report itself. Institutions are also required to disclose alcohol and drug policies and educational programs. Policies pertaining to sexual assault education, prevention, and adjudication must also be disclosed. A notification to students must also be included in the report that advises the campus community that victims of sexual assaults may change their academic or living arrangements, etc. § 485(f) of the HEA; 34 C.F.R. § 668.46 (b)(2).

The Clery Act also establishes a structure for the disclosure of crime statistics that must be followed. This structure ensures that CSRs for different institutions will present the required information in a consistent format and thereby provides a mechanism for meaningful comparison. 34 C.F.R. § 668.46 (c)

Noncompliance:

Wesley did not include certain required policy statements in its CSR's during the review period. In other cases, the published disclosures made were too vague to give actual notice to users of the report. Additionally, crime statistics and other required information fields were not included or were formatted improperly. One of the documents reviewed by the Department was entitled, "Annual Security Information Report 2004." However, this report contains crime statistics for calendar years 2002, 2003, and 2004. This report was submitted in response to our request for the most recent CSR. Therefore, the Department has determined that this report was Wesley's CSR that was required to be distributed on or before October 1, 2005.

Specific required disclosures that could not be identified in Wesley's 2005 CSR are: 1) a detailed description of the College's procedures for preparing the annual disclosure of crime statistics; 2) a statement regarding any procedures for the reporting of crimes on a voluntary and confidential basis by professional or pastoral counselors; and, 3) a statement advising interested parties where they may obtain law enforcement information regarding registered sex offenders in accordance with the Violent Crime Control and Law Enforcement Act of 1994.

Other required statements were not adequate, including the statement of the College's policy on the issuance of timely warnings. Although there is a brief allusion to "security alerts" under the heading, "The Office of Safety and Security," the CSR contains no

detailed information about the types of incidents that may trigger a warning, the decision-making process for determining if a warning is indicated, the officials charged with issuing warnings, or the means by which such warnings will be disseminated.

Lastly, Wesley's 2005 CSR contains no statistical fields for incidents or arrests occurring on non-campus property or public property as required. Additionally, the CSR provides no geographical breakdown for disciplinary referrals. The omission of these required fields violates the HEA and the Department's regulations and limits the ability of users of the report to make meaningful comparisons and may have resulted in the underreporting of incidents that may have occurred in the excluded geographical areas.

In its response, Wesley did not specifically address the issue of excluded or inadequate statements of policy or procedure. However, the College did provide some additional information on its policies and procedures as requested. Specifically, Wesley submitted more detailed policies and procedures regarding: 1) the preparation and distribution of the CSR; 2) requests for crime statistics from law enforcements and internal campus security authorities; 3) the issuance of timely warnings; 4) maintenance of and access to the daily crime log; and, 5) the College's response to sexual harassment and sexual assault. These materials should be integrated into the College's CSR to further strengthen the improved policies and procedures and formatting that were made part of subsequent CSR's.

Based on the facts outlined above, the Department has determined that Wesley did not comply with all of the Clery Act's policy, procedure, and programming disclosure requirements during the review period.

Accurate and complete disclosure of policies and properly formatted statistics allow members of the campus community to be fully informed and actively provide for their own safety. Any failure in this area deprives the campus community of vital information and effectively negates the intent of the Act.

To ensure adequate corrective actions are taken before the publication of the next CSR due October 1, 2010, Wesley is required to undertake the "Supplemental Corrective Measures" set forth in Section E of this FPRD.

E. Supplemental Corrective Measures

The Department has carefully considered the College's response and supporting documentation. The Department also takes note of some improvements that have already been implemented by Wesley. For example, a text message notification system was implemented during the 2007-2008 academic year. This system is operated by the Office of Information Technology and provides another means of reaching students and employees in the event of a health or safety emergency.

The review team also examined the College's 2006 crime log, which was implemented as a corrective action following the filing of the SOC complaint. The format and content of the new log appears to meet the Department's requirements. Additionally, subsequent CSR's

that were posted to the College's website included some expanded and improved policy statements. Also, the formatting of subsequent reports was improved.

To ensure that all necessary corrective actions are in place, Wesley must prepare a status report that addresses further the violations and weaknesses identified in this FPRD. The College must conduct a thorough review of its Clery Act compliance program focusing on the violations and weaknesses identified in this FPRD, their causes, and specific actions already taken or planned for the future that will ensure that they do not recur. Wesley must appoint an institutional official with sufficient knowledge and authority to gather information and prepare the status report.

The status report will allow the Department to better ascertain the extent of the noncompliance during the review period, ensure the adequacy of corrective actions, and provide a baseline for further monitoring. At a minimum, the College's status report must address the following:

- For Finding # 1: a re-examination of the College's timely warning policy. Wesley must review and, if necessary, revise its policies, procedures, and methods for identifying threats to the health and safety of students and employees, composing clear messages, and distributing the messages quickly to the campus community. The new policy must be published in the CSR due by October 1, 2010. Additionally, the College must review its internal operating procedure for timely warnings and ensure that it is workable, adequately supported in terms of staffing and technology, is sufficiently detailed, and that essential staff is properly training on executing the timely warning and emergency notification plans.
- For Finding # 2: a re-examination of the College's daily crime log policies and procedures. Wesley must review and, if necessary, revise its policies and procedures regarding the maintenance of an accurate and complete daily crime log. Also, Wesley must provide adequate training to all security personnel to ensure that they are aware of the log's existence, location, and purpose, understand its contents, and know to provide immediate access to all requestors.
- For Finding # 3: a comprehensive review of all policy, procedural, and programmatic disclosures required to be published in the CSR. The College must then take all necessary action to update and improve this information to ensure that each disclosure provides clear and accurate notice to students and employees about each covered topic. Wesley also must appoint a person or group to re-evaluate the accuracy and completeness of the CSR and ensure that its contents are kept current with all Clery Act provisions including those required by the recently enacted Higher Education Opportunity Act, Pub.L. 110-315 and the Department's implementing regulations.

- Lastly, the status report must address how the College will bring all campus security operations into compliance with the Federal Educational Records Privacy Act (FERPA). On several occasions, the review team identified instances wherein Wesley incorrectly applied the FERPA standards. For example, the Dean of Students cited FERPA concerns as the reason why pertinent information was not provided to the campus community.

Please provide copies of any documents or records referred to in your status report that were not already provided to the Department. Please submit your status report within 60 days of the date of this FPRD to:

Mr. James L. Moore, III
Senior Institutional Review Specialist
U.S. Department of Education
The Wanamaker Building
100 Penn Square East, Suite 511
Philadelphia, PA 19107

Once the status report is submitted and accepted by the Department, the program review will be closed. However, the College is reminded that corrective actions, whether already enacted or proposed for the future, do not diminish the seriousness of the violations identified during the program review.

This program review was conducted to monitor and enforce the Clery Act and to assist Wesley toward full compliance. The review team will continue to provide technical assistance and recommendations to institutional officials upon request. Technical assistance and recommendations are intended to facilitate ongoing improvement and are only advisory.

Program records relating to the period covered by this program review must be retained until the later of: resolution of the violations, weakness, and other issues identified during the program review or the end of the retention period applicable to Title IV-related records under 34 C.F.R. § 668.24 (e)(1) and (e)(2).

Thank you for your cooperation and patience throughout the program review process. Please direct any questions about this FPRD to Mr. James L. Moore, III on (215) 656-6495.