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Report on Data Verification of State Funded Scholarships

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The South Carolina Commission on Higher Education (CHE) has completed our evaluation of Bob Jones University's administration of the Palmetto Fellows Scholarship, LIFE Scholarship, HOPE Scholarship, and National Guard College Assistance Program awards for the 2020-2021 academic year.

The purpose of the data verification review was to evaluate whether systems are in place to adequately administer recipient awards in accordance with the provisions of the act, regulations, pertinent statutes and program guidelines. Our testing did not include the entire population of recipients, rather procedures were performed on a sample of recipients, selected randomly.

The procedures and the associated findings are as follows:

1. We obtained a copy of Bob Jones University's policy for awarding state scholarships and assistance programs.
2. We obtained the State's act, regulations, statutes, and program guidelines for the scholarship and grant programs funded by the State of South Carolina.
3. We reconciled invoices paid by CHE to the Commission on Higher Education Management Information System (CHEMIS) and the institution's disbursement report generated by Student Central, a financial system utilized by Bob Jones University.



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4. We obtained from CHEMIS the detail of scholarships and assistance awards disbursed during the period from July 1, 2020 through June 30, 2021. We selected a random sample of twenty-two Palmetto Fellows Scholarships, twenty-five LIFE Scholarships, eleven HOPE scholarships, and four National Guard College Assistance awards, and performed the following procedures for each sample item, as applicable:

General Eligibility Requirements for State Supported Scholarships/Grants (Palmetto Fellows, LIFE, HOPE):

1. We inspected paper student financial aid records generated by PowerFaid, Infoman, and Academic Folder, the institution's information management systems for indication of the following:
 - a. Recipient is a U.S. Citizen or legal permanent resident that meets the definition of an eligible non-citizen under State residency statutes whose lawful presence in the U.S. has been verified at the time of enrollment at the institution;
 - b. Recipient is a resident of South Carolina for in-state purposes at the time of high school graduation and at the time of enrollment at the institution, as set forth by Section 59-11-10, and be either a member of a class graduating from a high school located in this state, or a student who has successfully completed at least three of the final four years of high school within this state, or a home school student who has successfully completed a high school home school program in this state in the manner required by law, or a student graduating from a preparatory high school outside this State, while a dependent of a parent or guardian who is a legal resident of this State and has custody of the dependent according to State Statute, Section 59-149-50A, or a student whose parent or guardian has served in or has retired from one of the U.S. Armed Forces within the last four years, paid income taxes in this state for a majority of the years of service, and is a resident of this state;
 - c. Recipient is a graduate of an approved high school or equivalent program;
 - d. Recipient is admitted, enrolled full-time, and classified as a degree-seeking student at a public or independent institution in South Carolina;
 - e. Recipient certified that he/she has not defaulted and does not owe a refund or repayment on any federal or state financial aid;
 - f. Recipient certified that he/she has never been adjudicated delinquent, convicted, or pled guilty or nolo contendere to any felonies or any second subsequent alcohol/drug related offenses under the laws of this state or any other state or under the laws of the United States.

2. We inspected documentation for indication that the recipient completed an annual affidavit regarding felonies and loan default prior to being awarded a state scholarship each year.

Finding(s): We found no exceptions as a result of these procedures.

Eligibility Attribute Testing for the Palmetto Fellows Scholarship

Continuing Eligibility

1. We viewed academic records generated by the institution's information management systems for indication that each recipient selected for verification:
 - a. Earned at least a 3.0 cumulative GPA at the home institution by the end of each academic year,
 - b. Received the award in one of eight consecutive terms from the time of initial college enrollment,
 - c. Earned a minimum of thirty credit hours at the home institution by the end of each academic year.
2. We verified that the student completed the annual re-certification(s) regarding residency, convictions, transcripts and loan default.
3. We viewed award notifications and disbursement records for indication that the recipient did not receive the LIFE or HOPE scholarships in addition to the Palmetto Fellow Scholarship in the same academic year.

Palmetto Fellows Enhancement Eligibility

1. We verified that the recipient continued to meet all general eligibility requirements and is a recipient of the base Palmetto Fellows scholarship in the current review period.
2. We verified that the student completed at least fourteen credit hours in approved mathematics, life and physical sciences courses by the end of the first year of college enrollment.
3. We verified that the student is enrolled full-time as a degree seeking student in a declared major of science or mathematics in an eligible program that is approved and assigned a CIP code by CHE at the time of disbursement of Palmetto Fellows Scholarship Enhancement funds.

Finding(s): We found no exceptions as a result of these procedures.

Eligibility Attribute Testing for LIFE Scholarship

Initial Eligibility for LIFE Scholarship Incoming Freshmen (including 1st year transfers)

1. We verified that the recipient has met two of the three following academic eligibility requirements by obtaining a copy of the high school transcript and/or record of the test scores obtained by the Admissions office:
 - a. Recipient earned a score of 1100 or higher on the SAT or a composite score of no less than 24 on the ACT through the June test administration of the recipient's year of high school graduation,
 - b. Recipient earned a minimum 3.0 cumulative GPA on the SC UGP scale as documented on the final official transcript,
 - c. Recipient ranked in the top 30 percent of the graduating class as documented on the final official transcript.
2. We viewed financial aid award documentation for indication that the recipient did not receive the Palmetto Fellows Scholarship or HOPE Scholarship in addition to the LIFE Scholarship in the same academic year.

Additional Eligibility for Transferring Students

1. We viewed academic transcripts for indication that:
 - a. Recipient earned a cumulative LIFE GPA of 3.0 or higher and
 - b. Recipient met the annual credit hour requirement based on the initial enrollment date:
 - i. Second year transfer – 30 non-remedial credit hours (or equivalent)
 - ii. Third year transfer – 60 credit hours (or equivalent)
 - iii. Fourth year transfer – 90 credit hours (or equivalent)
2. We viewed financial aid award documentation for indication that the recipient did not receive the Palmetto Fellows or HOPE scholarship in addition to the LIFE scholarship in the same academic year.

LIFE Scholarship Enhancement Eligibility

1. We verified that the recipient continued to meet all general eligibility requirements and is a recipient of the base LIFE scholarship in the current review period.

2. We verified that the recipient completed at least fourteen credit hours in approved mathematics, life and physical science courses by the end of the first year of college enrollment.
3. We verified that the student was enrolled full-time as a degree-seeking student in a declared major of science or mathematics in an eligible program that is approved and assigned a CIP code by CHE at the time of disbursement of LIFE Scholarship Enhancement funds.

Continuing Eligibility:

1. We viewed academic records generated by the institution's information management systems for indication that each recipient selected for verification:
 - a. Earned a cumulative LIFE GPA of 3.0 or higher by the end of each academic year
 - b. Received the award in one of eight consecutive terms from the time of initial college enrollment
 - c. Met the annual credit hour requirement based on the initial college enrollment date:
 - i. Second year – 30 non-remedial credit hours (or equivalent)
 - ii. Third year – 60 credit hours (or equivalent)
 - iii. Fourth year – 90 credit hours (or equivalent)
2. We verified that the student completed the annual re-certification(s) regarding residency, convictions, transcripts, and loan default.
3. We viewed award notifications and disbursement records for indication that the recipient did not receive the Palmetto Fellows Scholarship or HOPE Scholarships in addition to the LIFE Scholarship in the same academic year.

Finding (s): We found no exceptions as a result of these procedures.

Eligibility Attribute Testing for HOPE Scholarship

Initial Eligibility for Freshmen and Transferring Freshmen in the Spring Semester:

1. We viewed the final high school transcript for indication that the recipient earned a cumulative high school GP of 3.0 or higher on the SC Uniform Grading Scale.
2. We viewed academic records generated by Bob Jones University's information management system for indication that:
 - a. Recipient is an incoming freshman

- b. Recipient received award within one of the first two terms of initial college enrollment
3. We determined that the student was enrolled full-time at the time of disbursement and classified as a degree seeking undergraduate student.
4. We verified that the student did not also receive the Palmetto Fellows Scholarship or the LIFE Scholarship in addition to the HOPE Scholarship in the same academic year.

Continuing Eligibility

1. We verified that the student received the scholarship for first year of attendance only unless the student transferred from a two-year institution where remedial courses were taken.

Finding(s): We found no exceptions as a result of these procedures.

Scholarship Award Disbursement Testing

1. We traced award amounts to the student's account detail to determine that the awarded amounts were identifiably credited to the recipient's account.
2. We compared total award disbursements for the academic year as reflected on the award letter to CHEMIS data submitted to CHE.
3. We compared total award disbursements for the academic year as reflected on the award letter to the following legislatively established award amounts:
 - a. Palmetto Fellows:
 - i. The published cost of attendance not to exceed \$6,700 for freshmen, \$7,500 for sophomores, juniors and seniors
 - ii. Up to an additional \$2,500 for the Enhancement, if eligible, in sophomore, junior, or senior years
 - iii. Award amount not applied to costs of continuing education or remedial/developmental courses
 - b. LIFE Scholarship:
 - i. The published cost of attendance not to exceed \$5,000
 - ii. Up to an additional \$2,500 for the Enhancement, if eligible, in sophomore, junior or senior years
 - iii. Award amount not applied to costs of continuing education or remedial/developmental courses

- c. HOPE Scholarship:
 - i. The published cost of attendance not to exceed \$2,800
 - ii. Award amount not applied to costs of continuing education or remedial/developmental courses

Finding(s): We found no exceptions as a result of these procedures.

National Guard College Assistance Program Testing

1. We verified that the recipient had valid tuition and fee expenses for the academic year under review.
2. We reviewed the enrollment status to ensure awards were prorated in accordance with the Pell Grant Model if not enrolled full-time.
3. We determined that the annual award amount was less than the published cost of attendance.
4. We determined that the recipient's total program benefits received was less than \$18,000 and that the recipient has earned less than 130 credit hours since initial eligibility into the college assistance program.
5. We traced the award amount in the financial aid award letter to the student's account detail.

Finding(s): We found no exceptions as a result of the procedures.

Record Retention

We determined if Bob Jones University retained in the student files the following information for each scholarship/grant recipient:

1. Certification that the student has no convictions of felonies and/or a second or subsequent alcohol/drug-related misdemeanor offense
2. Certification that the student has not defaulted and does not owe a refund or repayment on any federal or state financial aid
3. All transcripts for previous and current institutions attended
4. Award letter and terms of award
5. Verification of a 3.0 "LIFE GPA" for LIFE Scholarship recipients.

Finding(s): No exceptions were found as a result of the procedures.

This report is intended solely for the information and use of management of Bob Jones University and CHE, and it is not intended to be and should not be used by anyone other than these specified parties.

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