



# UNITED STATES DEPARTMENT OF EDUCATION

THE SECRETARY

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*In the Matter of*  
**Bnai Arugath Habosem**

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Docket No.92-131-ST

Student Financial  
Assistance Proceeding

## Decision of the Secretary

This matter comes before the Secretary on appeal by the Office of Student Financial Assistance Programs, U.S. Department of Education (OSFA), of the Initial Decision of Administrative Law Judge Allan C. Lewis (ALJ) dated March 2, 1993. Respondent Bnai Arugath Habosem (Bnai) filed a brief in opposition. In the Initial Decision, the ALJ determined that Bnai had committed a violation of Pell Grant regulations by disbursing Pell funds to 58 students who were enrolled simultaneously in Bnai and in secondary school. The ALJ determined that termination of Bnai was unwarranted, but did determine that Bnai should be fined \$1000 for its "one" violation.

In determining the appropriate fine to be levied against Bnai, the ALJ found Bnai to be a "small school," thus mitigating the amount of a fine to be imposed. The ALJ based this conclusion on Bnai's receipt of \$760,000 in Pell funds, and comparable cases which had previously come before the ALJ. In his determination, the ALJ rejected OSFA's argument that Bnai was a "medium-sized" school.

### DISCUSSION

On appeal, OSFA moves the Secretary to adopt a decision terminating Bnai's participation in the Pell Grant program and increasing the fine against Bnai to \$2,500 for each of the 58 improper disbursements to students.

OSFA argues that each student in receipt of improper funding equals one violation. In support of its appeal, OSFA argues that the violations of these Departmental regulations show that Bnai is not capable of fulfilling its fiduciary obligation to the Department.

The Department's general policy is that termination is appropriate when an institution has consistently violated the statutes and regulations governing student assistance programs or failed

to maintain standards of financial responsibility and administrative capability, and attempts to correct deficiencies have failed.<sup>1</sup>

The ALJ found that Bnai's violations did not entail the level of continued misconduct sufficient to warrant termination. The Secretary believes this finding is supported by substantial evidence and will not disturb it on appeal.

However, the Secretary believes that the ALJ erred in his finding that only one violation occurred. Continuing violations of the same regulatory prohibition should not be considered a single violation, but multiple violations of the same prohibition. Any other conclusion would result in an institution having no incentive to correct existing violations. The facts presented clearly indicate that 58 violations occurred -- the unlawful funding of each student who was simultaneously attending Bnai and a secondary institution.

Because of the ALJ's reliance on his finding that only one violation had occurred, the Secretary believes it is appropriate to reconsider the appropriate fine to be levied.

The Secretary has authority to fine an institution up to a maximum of \$25,000 for each regulatory violation. The amount of the fine is to reflect the "gravity of the violation" and the "size" of the institution.<sup>2</sup> The purpose of a fine is to punish the institution for its misconduct and to deter that school, as well as other institutions similarly situated, from committing similar violations in the future.

In determining the appropriate fine, the Secretary first considers the gravity of the violation. In the instant case, the violations appear to have been due to simple neglect, and Bnai took remedial measures in a reasonable time after discovery of the violations. The record shows that Bnai took immediate corrective action in repaying \$27,600 from 1992 and complied with the method of correction outlined in the "Dear Colleague" letter of February of 1992, as discussed by the ALJ. Bnai's cooperation is clearly a mitigating factor.

The Secretary must also consider the size of an institution when establishing a fine. The Secretary finds that neither the ALJ's experience nor the informal guidelines used by OSFA are appropriate. The ALJ has only a limited number of cases in his experience to use in determining the relative size of an institution; and, OSFA's argument for clearly delimited levels of participation in Title IV programs fails to demonstrate any statistical basis.

General information on the levels of participation in student financial assistance programs are available in the official files of the U.S. Department of Education. The Secretary has requested the Institutional Data System, Office of Postsecondary Education, U.S. Department

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<sup>1</sup> 42 Federal Register 64567 (1978).

<sup>2</sup> 34 C.F.R. § 668.92(a).

of Education, to provide fiscal year data regarding participation levels of educational institutions in the various federal student financial assistance programs. This information is attached to this decision in Appendix A, and the Secretary hereby takes administrative notice of this data.

In 1990, the last year for which complete figures were available, the median participation rate in the Pell Grant program was \$220,633. Fully fifty (50) percent of the schools participating in the Pell Grant program received less than \$220,633 in fiscal year 1990. Even assuming a growth rate in participation in the program, Bnai is not a "small school" as measured by their participation in the Pell Grant program. Therefore, Bnai's "size" should not be considered a mitigating factor.

Therefore, upon consideration of the original violations and Bnai's cooperation, the Secretary believes that a fine of \$1,500 per violation, for a total fine of \$87,000, is appropriate.

I therefore affirm the findings of the ALJ with respect to the issue of termination, but find that the fine of \$1,000 is inadequate for the reasons stated above and raise the fine to \$1,500 per violation for a total fine of \$87,000.

So ordered this 24th day of August, 1993.

  
Richard W. Riley

Washington, DC

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## Service List

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**U.S. DEPARTMENT OF EDUCATION - OFFICE OF POSTSECONDARY EDUCATION  
INSTITUTIONAL DATA SYSTEM - TITLE IV PROGRAM EXPENDITURES  
CRITERIA DEFINITIONS  
JULY 12, 1993**

**Overall Criteria:**

All Main Institutions, that have an OPE identification number located within the United States including Trust Territories, were selected from the Office of Postsecondary Education's Institutional Data System (IDS). The total universe is 10,747.

**Expenditures - Program Year:**

PELL, SEOG, PERKINS, and CWS programs are listed in Program Year cycles. A Program Year begins July 1st and ends June 30th of the following year.

**Expenditures - Fiscal Year:**

GSL STAFFORD, GSL PLUS and GSL SLS are listed in Fiscal Year cycles. A Fiscal Year begins October 1st and ends September 30th of the following year.

NOTE: All GSL Expenditures for Fiscal Years 1981, 1982, 1983 and 1984 are identified as cumulative figures under Fiscal Year 1984.

**Criteria #1: (Total Part.)**

The total number of institutions with an expenditure greater than zero.

**Criteria #2: (Total Expenditures)**

The sum of all expenditures for each program.

**Criteria #3: (Maximum Expenditure)**

The highest expenditure for each program.

**Criteria #4: (Minimum Expenditure)**

The lowest expenditure for each program.

**Criteria #5: (Mean)**

The mean was computed by using the total expenditures by program divided by the number of institutions with a value greater than zero.

## Page 2 - CRITERIA DEFINITIONS

### **Criteria #6: (Median)**

The median was computed by locating the expenditure by program that is the midpoint of all institutions with a value greater than zero.

### **Criteria #7: (Mode)**

The mode was computed by locating the most frequent occurring expenditure by program with a value greater than zero.

### **Criteria #8: (Standard Deviation)**

The standard deviation was computed by summing the squared deviations of each measure from the mean of its distribution by program with a value greater than zero.



**U.S. DEPARTMENT OF EDUCATION - OFFICE OF POSTSECONDARY EDUCATION  
 INSTITUTIONAL DATA SYSTEM - TITLE IV PROGRAM EXPENDITURES  
 FISCAL YEAR 1981  
 July 12, 1993**

PROGRAM	TOTAL PART.	TOTAL EXPENDITURES	MAXIMUM EXPENDITURE	MINIMUM EXPENDITURE	MEAN	MEDIAN	MODE	STANDARD DEVIATION
PELL	5,497	\$2,337,157,622	\$ 77,168,057	\$ 120	\$ 425,170	\$ 132,429	\$ 712	1582229.470
SEOG	3,600	\$ 359,489,158	\$ 4,595,116	\$ 79	\$ 99,858	\$ 33,963	\$ 500	213433.944
PERKINS	2,970	\$ 681,282,080	\$ 7,021,850	\$ 92	\$ 229,388	\$ 75,762	\$ 1,000	514260.436
CWS	3,014	\$ 541,529,763	\$115,266,671	\$ 27	\$ 179,671	\$ 72,267	\$ 5,000	396206.487
*GSL STAFFORD								
*GSL PLUS								
*GSL SLS								

**PROGRAMS:**

- PELL - Pell Grant Program
- SEOG - Supplemental Educational Opportunity Grants
- PERKINS - Perkins Direct Student Loan Program
- CWS - College Work-Study Program
- GSL STAFFORD - Stafford Loan Program (Guaranteed Student Loan Program)
- GSL PLUS - PLUS (Auxiliary) Loan Program (Guaranteed Student Loan Program)
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**\*NOTE:** All GSL Expenditures for Fiscal Years 1981, 1982, 1983 and 1984 are identified as cumulative figures under Fiscal Year 1984.



**U.S. DEPARTMENT OF EDUCATION - OFFICE OF POSTSECONDARY EDUCATION**  
**INSTITUTIONAL DATA SYSTEM**  
**TITLE IV PROGRAM EXPENDITURES**  
**FISCAL YEAR 1982**  
**July 12, 1993**

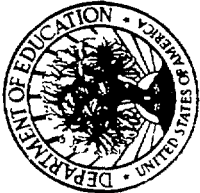
PROGRAM	TOTAL PART.	TOTAL EXPENDITURES	MAXIMUM EXPENDITURE	MINIMUM EXPENDITURE	MEAN	MEDIAN	MODE	STANDARD DEVIATION
PELL	5,588	\$ 2,243,659,389	\$ 71,993,742	\$ 120	\$ 401,514	\$ 122,774	\$ 682	1521100.030
SEOG	3,705	\$ 364,970,421	\$ 8,679,841	\$ 44	\$ 98,508	\$ 30,434	\$ 5,000	255997.541
PERKINS	2,913	\$ 607,457,515	\$ 39,733,519	\$ 107	\$ 208,533	\$ 60,213	\$ 1,000	856260.743
CWS	3,011	\$ 499,832,638	\$ 9,918,873	\$ 20	\$ 166,002	\$ 66,506	\$ 4,500	352977.379
*GSL STAFFORD								
*GSL PLUS								
*GSL SLS								

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**U.S. DEPARTMENT OF EDUCATION - OFFICE OF POSTSECONDARY EDUCATION**  
**INSTITUTIONAL DATA SYSTEM**  
**TITLE IV PROGRAM EXPENDITURES**  
**FISCAL YEAR 1983**  
**July 12, 1993**

PROGRAM	TOTAL PART.	TOTAL EXPENDITURES	MAXIMUM EXPENDITURE	MINIMUM EXPENDITURE	MEAN	MEDIAN	MODE	STANDARD DEVIATION
PELL	5,652	\$ 2,358,785,010	\$ 77,113,157	\$ 56	\$ 417,336	\$ 134,512	\$ 763	1605309.040
SEOG	3,833	\$ 339,032,649	\$ 3,582,352	\$ 54	\$ 88,451	\$ 25,765	\$ 4,925	200959.794
PERKINS	2,897	\$ 577,903,353	\$ 7,432,375	\$ 55	\$ 199,483	\$ 60,119	\$ 1,000	465815.804
CWS	3,071	\$ 487,053,207	\$ 6,339,892	\$ 1	\$ 158,598	\$ 61,070	\$ 4,771	321443.243
*GSL STAFFORD								
*GSL PLUS								
*GSL SLS								

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**U.S. DEPARTMENT OF EDUCATION - OFFICE OF POSTSECONDARY EDUCATION**  
**INSTITUTIONAL DATA SYSTEM**  
**TITLE IV PROGRAM EXPENDITURES**  
**FISCAL YEAR 1984**  
**July 12, 1993**

PROGRAM	TOTAL PART.	TOTAL EXPENDITURES	MAXIMUM EXPENDITURE	MINIMUM EXPENDITURE	MEAN	MEDIAN	MODE	STANDARD DEVIATION
PELL	5,822	\$ 2,722,270,959	\$ 82,857,244	\$ 92	\$ 467,583	\$ 148,552	\$ 763	1725803.380
SEOG	3,977	\$ 354,752,967	\$ 3,618,554	\$ 200	\$ 89,201	\$ 25,166	\$ 5,000	207079.983
PERKINS	2,902	\$ 666,987,852	\$ 7,131,751	\$ 100	\$ 229,837	\$ 72,177	\$ 5,000	533956.838
CWS	3,117	\$ 510,294,347	\$ 8,349,184	\$ 11	\$ 163,713	\$ 65,566	\$ 2,038	344476.116
*GSL STAFFORD	2,379	\$27,775,500,054	\$424,741,251	\$ 600	\$ 11,675,284	\$ 3,849,426	\$ 3,500	497808.117
*GSL PLUS	1,767	\$ 331,322,004	\$ 5,071,364	\$ 455	\$ 187,505	\$ 49,450	\$ 3,000	375328.807
*GSL SLS	1,245	\$ 162,722,505	\$ 9,321,161	\$ 50	\$ 130,701	\$ 10,000	\$ 2,500	14563.119

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**INSTITUTIONAL DATA SYSTEM**  
**TITLE IV PROGRAM EXPENDITURES**  
**FISCAL YEAR 1985**  
**July 12, 1993**

PROGRAM	TOTAL PART.	TOTAL EXPENDITURES	MAXIMUM EXPENDITURE	MINIMUM EXPENDITURE	MEAN	MEDIAN	MODE	STANDARD DEVIATION
PELL	5,949	\$ 2,937,340,301	\$ 83,491,611	\$ 75	\$ 493,754	\$ 153,709	\$ 1,900	1779285.830
SEOG	4,077	\$ 369,590,195	\$ 3,395,620	\$ 200	\$ 90,652	\$ 26,250	\$ 4,762	206716.902
PERKINS	2,880	\$ 669,730,277	\$ 7,148,669	\$ 52	\$ 232,545	\$ 76,788	\$ 3,000	509763.907
CWS	3,152	\$ 481,719,981	\$ 7,019,576	\$ 3	\$ 152,830	\$ 59,933	\$ 4,844	321030.392
GSL STAFFORD	2,257	\$ 5,083,249,280	\$ 57,678,078	\$ 1,250	\$ 2,252,215	\$ 921,504	\$ 5,000	4035994.510
GSL PLUS	1,722	\$ 183,844,213	\$ 2,810,028	\$ 230	\$ 106,762	\$ 36,749	\$ 3,000	194580.619
GSL SLS	1,315	\$ 150,579,424	\$ 4,659,473	\$ 125	\$ 114,509	\$ 10,000	\$ 2,500	356124.834

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**TITLE IV PROGRAM EXPENDITURES**  
**FISCAL YEAR 1986**  
**July 12, 1993**

PROGRAM	TOTAL PART.	TOTAL EXPENDITURES	MAXIMUM EXPENDITURE	MINIMUM EXPENDITURE	MEAN	MEDIAN	MODE	STANDARD DEVIATION
PELL	5,941	\$3,178,339,524	\$ 60,271,290	\$ 1	\$ 534,984	\$ 169,154	\$ 1,050	1489635.660
SEOG	4,171	\$ 404,775,231	\$ 3,455,381	\$ 90	\$ 97,045	\$ 30,685	\$ 4,762	210331.123
PERKINS	2,787	\$ 695,690,079	\$ 6,465,067	\$ 3	\$ 249,620	\$ 84,560	\$ 1,000	518203.300
CWS	3,172	\$ 518,213,964	\$ 29,217,919	\$ 10	\$ 163,371	\$ 62,959	\$ 5,000	605939.986
GSL STAFFORD	2,250	\$4,494,774,737	\$ 51,496,974	\$ 1,000	\$ 1,997,678	\$ 854,115	\$ 1,000	3538502.600
GSL PLUS	1,790	\$ 168,215,287	\$ 1,623,268	\$ 756	\$ 93,975	\$ 35,720	\$ 3,000	158295.266
GSL SLS	1,392	\$ 153,989,051	\$ 5,296,319	\$ 260	\$ 110,624	\$ 11,538	\$ 2,500	326157.422

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**TITLE IV PROGRAM EXPENDITURES**  
**FISCAL YEAR 1987**  
**July 12, 1993**

PROGRAM	TOTAL PART.	TOTAL EXPENDITURES	MAXIMUM EXPENDITURE	MINIMUM EXPENDITURE	MEAN	MEDIAN	MODE	STANDARD DEVIATION
PELL	6,170	\$3,391,296,258	\$ 92,935,142	\$ 37	\$ 549,643	\$ 156,780	\$ 2,100	2189502.960
SEOG	4,253	\$ 384,814,679	\$ 4,169,513	\$ 210	\$ 90,481	\$ 27,617	\$ 5,000	203036.112
PERKINS	2,769	\$ 790,997,422	\$ 6,953,312	\$ 150	\$ 285,662	\$ 99,814	\$ 1,575	582320.115
CWS	3,323	\$ 537,599,637	\$ 6,332,616	\$ 7	\$ 161,781	\$ 60,481	\$ 4,943	345372.293
GSL STAFFORD	2,246	\$4,544,544,729	\$ 57,082,127	\$ 389	\$ 2,023,395	\$ 796,028	\$ 2,500	3673883.830
GSL PLUS	1,807	\$ 198,579,036	\$ 2,016,519	\$ 400	\$ 109,894	\$ 44,415	\$ 3,000	192047.525
GSL SLS	1,799	\$ 249,434,148	\$ 6,046,825	\$ 145	\$ 138,652	\$ 28,768	\$ 4,000	360000.058

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**U.S. DEPARTMENT OF EDUCATION - OFFICE OF POSTSECONDARY EDUCATION**  
**INSTITUTIONAL DATA SYSTEM**  
**TITLE IV PROGRAM EXPENDITURES**  
**FISCAL YEAR 1988**  
**July 12, 1993**

PROGRAM	TOTAL PART.	TOTAL EXPENDITURES	MAXIMUM EXPENDITURE	MINIMUM EXPENDITURE	MEAN	MEDIAN	MODE	STANDARD DEVIATION
PELL	6,258	\$3,597,748,942	\$ 76,130,224	\$ 2	\$ 574,904	\$ 167,864	\$ 2,100	1886909.150
SEOG	4,216	\$ 398,918,128	\$ 3,966,938	\$ 210	\$ 94,620	\$ 29,719	\$ 5,000	205981.318
PERKINS	2,635	\$ 836,435,726	\$ 8,602,442	\$ 33	\$ 317,433	\$ 114,070	\$ 300	657586.008
CWS	3,442	\$ 555,125,592	\$ 7,708,722	\$ 6	\$ 161,280	\$ 60,021	\$ 5,000	352054.478
GSL STAFFORD	2,221	\$4,768,913,846	\$ 64,483,513	\$ 200	\$ 2,147,192	\$ 805,122	\$ 2,625	4074496.620
GSL PLUS	1,922	\$ 350,780,888	\$ 3,418,557	\$ 500	\$ 182,508	\$ 71,462	\$ 4,000	339116.967
GSL SLS	2,001	\$ 475,929,478	\$ 10,273,156	\$ 150	\$ 237,846	\$ 55,779	\$ 4,000	585166.000

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**U.S. DEPARTMENT OF EDUCATION - OFFICE OF POSTSECONDARY EDUCATION**  
**INSTITUTIONAL DATA SYSTEM**  
**TITLE IV PROGRAM EXPENDITURES**  
**FISCAL YEAR 1989**  
**July 12, 1993**

PROGRAM	TOTAL PART.	TOTAL EXPENDITURES	MAXIMUM EXPENDITURE	MINIMUM EXPENDITURE	MEAN	MEDIAN	MODE	STANDARD DEVIATION
PELL	6,508	\$4,434,081,214	\$ 80,506,727	\$ 37	\$ 681,328	\$ 191,805	\$ 1,100	2215859.170
SEOG	4,142	\$ 398,282,454	\$ 4,164,922	\$ 100	\$ 96,157	\$ 30,013	\$ 5,000	208449.311
PERKINS	2,549	\$ 897,372,646	\$ 8,197,057	\$ 140	\$ 352,049	\$ 120,717	\$ 2,000	733713.803
CWS	3,400	\$ 560,159,259	\$ 7,350,490	\$ 8	\$ 164,753	\$ 61,487	\$ 5,011	356588.257
GSL STAFFORD	2,205	\$5,325,664,172	\$ 68,262,330	\$ 443	\$ 2,415,267	\$ 942,336	\$ 2,625	4487814.980
GSL PLUS	1,918	\$ 486,436,642	\$ 4,331,880	\$ 623	\$ 253,617	\$ 102,793	\$ 4,000	450794.777
GSL SLS	1,988	\$ 539,228,057	\$ 9,539,771	\$ 400	\$ 271,241	\$ 61,170	\$ 4,000	649229.698

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**U.S. DEPARTMENT OF EDUCATION - OFFICE OF POSTSECONDARY EDUCATION**  
**INSTITUTIONAL DATA SYSTEM**  
**TITLE IV PROGRAM EXPENDITURES**  
**FISCAL YEAR 1990**  
**July 12, 1993**

PROGRAM	TOTAL PART.	TOTAL EXPENDITURES	MAXIMUM EXPENDITURE	MINIMUM EXPENDITURE	MEAN	MEDIAN	MODE	STANDARD DEVIATION
PELL	6,631	\$ 6,306,890,100	\$ 95,732,205	\$ 1	\$ 951,122	\$ 220,633	\$ 2,300	4111241.880
SEOG	4,031	\$ 443,223,537	\$ 4,705,860	\$ 29	\$ 109,954	\$ 39,754	\$ 5,140	224523.846
PERKINS	2,539	\$ 906,757,404	\$ 9,550,971	\$ 50	\$ 357,132	\$ 121,850	\$ 2,000	726296.917
CWS	3,413	\$ 583,220,636	\$ 7,453,127	\$ 62	\$ 170,882	\$ 66,258	\$ 50,000	363703.024
GSL STAFFORD	2,187	\$ 6,080,598,082	\$ 72,163,544	\$ 513	\$ 2,780,337	\$ 1,035,728	\$ 2,625	5132896.990
GSL PLUS	1,946	\$ 623,541,274	\$ 5,009,603	\$ 672	\$ 320,422	\$ 136,915	\$ 4,000	562458.143
GSL SLS	1,981	\$ 716,391,436	\$ 15,630,914	\$ 229	\$ 361,631	\$ 79,507	\$ 4,000	850602.140

**PROGRAMS:**

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