

# MEMORANDUM

UNITED STATES DEPARTMENT OF EDUCATION

WASHINGTON, D.C. 20202-\_\_\_\_\_

AUG 2, 1996

IRB-96-2

TO: Chiefs, Institutional Review Branch, Regions I-X

THRU: Howard E. Fenton, Director  
Institutional Monitoring Division

Bonnie LeBold, Director  
Regional Operations Division

FROM: Shirley Brown, Acting Chief  
Institutional Review Branch, IMD

SUBJECT: Access to Institutional Title IV Records

The purpose of this memorandum is to provide guidance to program reviewers regarding ED's right of access to institutional records when conducting Title IV program reviews. Some large institutions or proprietary corporations elect to maintain their Title IV records at a main campus or corporate headquarters which may be geographically separated from their branch campuses. However, regardless of the arrangement made by these entities, **institutions must make Federal Student Financial Assistance records available for review at the geographical location in which the program review is conducted.**

34 CFR 668.23 of the General Provisions regulations states in part that "Records required under applicable program regulations and this part shall be readily available for review by the Secretary at the geographical location where the student will receive his or her degree or certificate of program or course completion."

Fear of theft, loss, or damage to student financial assistance records are not acceptable reasons for noncompliance with the above-mentioned regulation. If a reviewer is denied access to the records or institutional officials refuse to cooperate, the reviewer should immediately notify his or her supervisor with a recommendation for transfer of the school to the reimbursement method of payment.

Keep in mind that there will be situations in which travel to corporate offices to review records will be necessary. Should it be necessary to travel to the corporate office, the use of professional judgment by the Regional Director/Branch Chief in determining the appropriateness of such travel is encouraged. However, under no circumstances should the regional office allow the institution to pay for travel expenses.

If you have any questions, please call David Wortham of my staff at (202) 401-3569.

cc: Regional Directors  
Mary K. Muncie  
Phillip M. "Radar" Brumback  
IRB/IMD staff