



April 19, 2011

Mr. George D. Gearhart, Chancellor  
University of Arkansas  
425 Administration Building  
Fayetteville, AR 72701

**Certified Mail**  
**Return Receipt Requested**

**No. 7008 1300 0000 0275 4302**

RE: **Program Review Report**  
OPE ID: 00110800  
PRCN: 201030627210

Dear Chancellor Gearhart:

From June 8, 2010 through June 10, 2010, Michael Rhodes and Linda Shewack conducted a review of The University of Arkansas' (UA, the University) administration of the 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). The review focused solely on UA's compliance with the *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act)*. The findings of that review are presented in the enclosed report.

Findings of noncompliance are referenced to the applicable statutes and regulations and specify the action required to comply with the statute and regulations. Please review the report and respond to each finding, indicating the corrective actions taken by UA. The response should include a brief, written narrative for each finding that clearly states UA's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, UA must provide supporting documentation as required in each finding.

Please note that pursuant to HEA section 498A(b), the Department is required to:

- (1) provide to the institution an adequate opportunity to review and respond to any preliminary program review report<sup>1</sup> and relevant materials related to the report before any final program review report is issued;
- (2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination –

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<sup>1</sup> A "preliminary" program review report is the program review report. The Department's final program review report is the Final Program Review Determination (FPRD).

Federal Student Aid, School Participation Team - Dallas  
1999 Bryan Street, Suite 1410, Dallas, TX 752  
[www.FederalStudentAid.ed.gov](http://www.FederalStudentAid.ed.gov)

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FEDERAL STUDENT AID  START HERE. GO FURTHER.

- a. A written statement addressing the institution's response;
- b. A written statement of the basis for such report or determination; and
- c. A copy of the institution's response.

The Department considers the institution's response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution's written response will not be attached to the final program review determination (FPRD). However, it will be retained and available for inspection by UA upon request. Copies of the program review report, the institution's response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after the FPRD is issued.

The University's response should be sent directly to Michael Rhodes of this office within 30 calendar days of receipt of this letter.

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims, or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

We express our appreciation for the courtesy and cooperation extended during the review. Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact Michael Rhodes at (214) 661-9484 or via e-mail at michael.rhodes@ed.gov.

Sincerely,



*fa*  
Cynthia Thornton  
Area Case Director  
School Participation Team – Dallas

cc: Mr. Steve Gahagans, Chief of Police, UA Police Department  
Ms. Katie Wing, Director of Financial Aid

*Enclosure:*  
*Protection of Personally Identifiable Information*

Prepared for

**University of Arkansas**

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START HERE  
GO FURTHER  
FEDERAL STUDENT AID

OPE ID: 00110800

PRCN: 201030627210

Prepared by

U.S. Department of Education

Federal Student Aid

School Participation Team - Dallas

## Program Review Report

April 19, 2011

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**A. Institutional Information**

University of Arkansas  
425 Administration Building  
Fayetteville, AR 72701

**Type:** Public

**Highest Level of Offering:** Master's or Doctor's Degrees

**Accrediting Agency:** North Central Association of Colleges and Schools

**Current Student Enrollment:** 19,194 (2008-2009)

**% of Students Receiving Title IV:** 37% (2008-2009)

**Title IV Participation, Per U.S. Department of Education Data Base  
(Postsecondary Education Participants System):**

2007-2008 Award Year

Federal Pell Grant Program	\$ 9,781,666
Federal Family Education Loan Program	\$ 73,815,287
Federal Perkins Loan Program	\$ 957,191
Federal Work-Study Program	\$ 1,096,473
Federal Supplemental Education Opportunity Grant Program	\$ 1,248,337

**Default Rate FFEL:** As of:

2007	3.4%
2006	2.3%
2005	2.4%

**Default Rate Perkins:**

As of:	
6/30/2007	9.4%
6/30/2006	16.0%
6/30/2005	12.6%

The University of Arkansas (UA; the University), located in Fayetteville, Arkansas, is a land-grant coeducational public research university. The campus is protected by the UA Police Department (UAPD), which employs 31 sworn officers, 8 support persons, and a range of 15 to 20 student employees under the Federal College Work Study Program. The UAPD operates 24 hours a day, 365 days a year. Authority of the sworn officers is

derived from state statutes, which allow for full police powers on UA property. In addition, the UAPD has an agreement with the City of Fayetteville and the city police.

## **B. Scope of Review**

The U.S. Department of Education (the Department) conducted a focused campus security program review at UA from June 8, 2010 to June 10, 2010. The review was conducted by Michael Rhodes and Linda Shewack.

The focus of the review was to evaluate UA's compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act). The Clery Act is included in §485(f) of the Higher Education Act of 1965, as amended (HEA), 20 U.S.C. §1092(f). The Department's implementing regulations are at 34 C.F.R. §§668.41-668.46. UA was selected for review from a sample of institutions of higher education with sworn police departments. The review was not the result of a specific complaint or allegation of non-compliance. The review consisted of an examination of UA's catalog and written agreements, police incident reports, arrest records and disciplinary files, as well as the institution's policies, practices, and procedures related to the Clery Act. The review also included a comparison of the campus statistics submitted by UA to the Department and reported to students and employees. The reviewers also interviewed institutional officials with Clery Act responsibilities.

The Department's program review coincided with the Quality Assurance Review (QAR) that the Federal Bureau of Investigation (FBI)'s Criminal Justice Information Service (CJIS) Audit Unit conducted at UA. The U.S. Department of Education is partnering with the CJIS Audit Unit (CAU) to ensure accurate crime reporting on America's college campuses. The CAU reviews law enforcement agencies' reporting practices, and audits crime statistics that are reported by the states through their participation in the Uniform Crime Reporting (UCR) program. The results of the QAR are shared with the Department for a comparative analysis of the annual security report data received from participating postsecondary institutions. The CAU reviewed a total of 53 Group A Offenses and 52 Group B Offenses that were recorded from January 1, 2009 through December 31, 2009. A copy of the CJIS report is attached as Appendix A.

The Department reviewed 25 campus police incident reports for Part I Offenses, 50 disciplinary reports and an additional 82 miscellaneous campus police incident reports from calendar year 2008. The files were selected randomly from a list of all incidents of crime reported to the AUPD or other campus security authority and from a listing of all arrests and disciplinary referrals for law violations involving alcohol, illegal drugs, illegal usage of legal controlled substances and weapons during the same calendar year. Approximately 50 incident reports were cross-checked against the daily crime log to ensure that crimes occurring within UAPD's patrol jurisdiction were entered properly on the log as required.

**Disclaimer:**

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning UA'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 UA of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

While this report reflects initial findings of the Department, they are not final. The Department will issue a Final Program Review Determination Letter at a later date.

**C. Findings**

During the review, two areas of noncompliance were noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by UA to bring operations into compliance with the statutes and regulations.

**Finding 1: Failure to Report Crimes**

**Citation:**

The Clery Act and the Department's regulations require that Title IV participating institutions must report statistics in an annual security report for the three most recent calendar years concerning the occurrence on campus, in or on noncampus buildings or property, and on public property of the following incidents that are reported to local police agencies or to a campus security authority: criminal homicide, murder and nonnegligent manslaughter, negligent manslaughter, forcible and nonforcible sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, arson, arrests for liquor law violations, drug law violations, and illegal weapons possession, and persons who were referred for campus disciplinary action for liquor law violations, drug law violations, and illegal weapons possession. *34 CFR§ 668.46(c)*

**Non-Compliance:**

UA failed to include Incident #080365, Minor in Possession, and Incident #080589, Aggravated Assault, in its 2008 annual security report (ASR).

As noted in Section B, this program review was planned and conducted as part of the Department's partnership with the FBI's CJIS Audit Unit. The CAU also identified instances of inaccurate classification of incidents. Incident #091000 was classified as Forcible Rape; it should have been classified as Sexual Assault with an Object. This incident occurred in campus housing and falls in the Sex offenses – Forcible category for

Clery Act reporting purposes. The other instances of inaccurate classification noted by the CAU involved offenses that are not reported under the Clery Act .

**Required Action:**

In response to this finding, UA may provide any additional documentation on Incidents #s 080365 and 080589 that would demonstrate why the incidents should not be included in the crime statistics for calendar year 2008. Otherwise, UA must update the current on-line version of its ASR to include the omitted incidents. UA must also update the crime statistics uploaded to the Department's web site. To correct the campus crimes statistics on the Department's web site, UA should call the Campus Crime helpdesk at 1-800-435-5985. Documentation of the correction to the institution's on-line annual security report must be submitted to the Department.

With regard to the discrepancies noted by the FBI's CAU in its QAR, only Incident #091000 was reportable for Clery Act purposes. UA should have corrected this error prior to reporting campus crimes statistics for Clery Act purposes for calendar year 2009. In its response to this report, UA must show that this incident was included in its 2010 ASR in the On-campus Student Housing Facilities category.

**Finding 2: Daily Crime Log Incomplete**

**Citation:**

The Clery Act and the Department's regulations require that an institution that maintains a campus police or a campus security department must maintain a written, easily understood daily crime log that records, by the date the crime was reported, any crime that occurred on campus, on a noncampus building or property, on public property, or within the patrol jurisdiction of the campus police or the campus security department and is reported to the campus police or the campus security department. *34 CFR 668.46(f)(1)*

**Non-Compliance:**

UA failed to make crime log entries for the dates of July 1 through July 7 on the daily crime log.

**Required Action:**

UA staff explained to the reviewers that one person has been responsible for updating the crime log on a daily basis. While that person was off work for a week of vacation time, the crime log did not get updated. When the responsible party returned from vacation, the log entries resumed, but the information about crimes that were reported on the days this person was on vacation were never entered. In response to this finding, the

University must develop procedures to ensure that the daily crime log is updated within two business days of the report of the information to the campus police or campus security department, unless that disclosure is prohibited by law or would jeopardize the confidentiality of the victim as required by 34 CFR §668.46(f). In developing its procedures, the University may want to consider appointing a back-up employee to complete the crime log updates in instances where the person normally responsible for that duty is unavailable. A copy of those procedures must accompany UA's response to this finding.

Based on an evaluation of all available information, including UA's response, the Department will determine if additional actions are necessary and advise the University accordingly in the Final Program Review Determination letter.

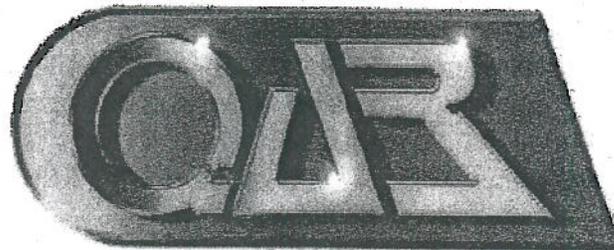
**Appendix A: CJIS Quality Assurance Review Report**

U.S. Department of Justice  
Federal Bureau of Investigation  
Criminal Justice Information Services (CJIS) Unit



**IBR Exit Briefing  
Local Agency Review**

**Univ. of AR Police Department  
Fayetteville**



*Quality Assurance Review*

*Shared Management  
Shared Responsibility  
Shared Success*

*A Partnership in Criminal Justice*

*Quality Assurance Review*

*IBR Local Agency Exit Briefing Packet*

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### Local Agency Review Process

To adequately conduct a state Uniform Crime Reporting (UCR) Program Quality Assurance Review (QAR), the CJIS Audit Unit (CAU) reviews local agencies that contribute to the national Program through their respective state Programs. This helps evaluate the crime reports as they relate to data submission to the national UCR Program via the state UCR Program. The CAU staff contact these agencies through a designated Point of Contact (POC) approximately 45 days prior to the scheduled Review to gather information regarding the flow of reports from the time an incident is reported, to its classification, scoring, and submission to the national UCR Program. During the initial contact call, the auditors discuss logistics pertaining to the on-site Review with the agency POC and make preliminary plans regarding the Review. The CAU staff then follows up with written confirmation of the scheduled QAR to the Chief/Sheriff and UCR POC that will give general information concerning the QAR process.

The local agency QAR consists of three phases:

- Administrative Interview
- Data Quality Review
- Exit Briefing

#### Administrative Interview

During the administrative interview, CAU staff learn how an agency manages crime reports and whether the data submitted to the national UCR Program comply with national definitions and guidelines or, if not, how the data are converted to national UCR Program standards prior to submission to the national UCR Program.

The interview is based on the agency's policies and procedures concerning the national UCR Program's standards, definitions and information requirements. Topics covered during the interview include:

- Duties and responsibilities of the UCR POC
- Records management system
- Classification and Scoring
- Arrests
- Clearances
- Jurisdiction
- Property Values
- Offenders
- Hate Crime
- Law Enforcement Officers Killed or Assaulted (LEOKA)
- Updating Quality Assurance
- State Program Services

### Data Quality Review

During the data quality review, the CAU staff reviews a predetermined number of Group A and Group B incidents based on a statistical sampling method used at the state level. Record counts are distributed to agencies based on their Return A record counts. Case files, including the officer's narrative and supplemental information, are then compared to data reported to the national UCR Program to determine if the standards and definitions were appropriately applied. The CAU staff then determine if the offenses were appropriately classified into the Group A and Group B offense categories for NIBRS reporting as defined by the national UCR Program. The following error/discrepancy categories are considered when reviewing the incidents for accuracy:

- Overreported - Information reported was not documented in the case file.
- Underreported - Additional information is available in the case file and was not reported.
- Inaccurate - Information reported did not match the case report.

CAU staff compare agency documentation with a NIBRS printout that encompasses the 56 data elements displaying offense, offender, property, victim and arrestee data reported to the national UCR Program.

Overreported, underreported and inaccurate offenses discovered in data element 6 are scored as classification errors when they do not meet the national UCR Program definitions. Other data element discrepancies discovered in the remaining 55 data elements (excluding classification data element 6 errors) are provided for information only to identify systemic technical issues or areas where additional training may be needed.

Classification errors and data element discrepancies are documented for evaluation and discussion with local agency personnel and/or the state UCR Program manager.

Additionally, the CAU staff reviews incidents to ensure Hate Crimes and LEOKA data are reported according to the national standards and definitions for NIBRS.

### Exit Briefing

The CAU staff provides an exit briefing packet to the local agency that summarizes the findings based on the administrative interview and the data quality review. The exit briefing packet contains a brief description of all the topics covered during the administrative interview and documents local agency compliance with UCR guidelines. During the exit briefing, the CAU staff will review/discuss each of the classification errors and data element discrepancies with the local agency UCR Point of Contact to verify the auditor's findings. The CAU will answer any questions the agency may have.

**Data Quality Classification Results - Group A/B**

The data quality portion of this QAR will help assess the state concerning conformance to policy, definitions and information requirements. Requirement One, NIBRS handbook page 2 "The state Program must conform to the national UCR Program's standards definitions and information requirements."

Month(s) Reviewed: Jan - Dec 2009 Total Group A Offenses Reviewed: 53

**Offense / Definition Classification**

Indicates data element 6 (UCR Offense Code) record as classification errors when they do not meet the national UCR Program definitions.

Overreported:

Underreported:

Inaccurate:

Total Group B Records Reviewed: 52

Total underreported Group A offenses found in Group B Arrest Reports:

**Total Classification Errors:**

**LEOKA**

Overreported:

Underreported:

**Hate Crime**

Total Hate Crime Reviewed: \_\_\_\_\_

Overreported:

Underreported:

Inaccurate:

Inaccurate from Data Element 8A:

The administrative interview portion of this QAR will help assess the state concerning conformance to policy, definitions and information requirements. Requirement One, NIBRS handbook page 2 "The state Program must conform to the national UCR Program's standards definitions and information requirements."

**Scoring**

1.  For counting purposes, the agency:

a. Counts one offense for each victim of a "Crime Against Persons" (UCR Handbook, NIBRS Edition, 1992, p. 29)

**Meets UCR Guidelines**

b. Counts one offense for each distinct operation or attempt for "Crime Against Property" except motor vehicle theft, where one offense is counted for each stolen vehicle. (UCR Handbook, NIBRS Edition, 1992, p. 29)

**Meets UCR Guidelines**

c. Counts one offense for each "Crime Against Society" (UCR Handbook, NIBRS Edition, 1992, p. 29)

**Meets UCR Guidelines**

Comments:

**Arrests**

2.  Arrestee data is to be reported for all persons apprehended for the commission of Group A or Group B Crimes (except Justifiable Homicide). The arrestee data to be reported describes the arrestee (e.g., his/her age, sex, race, etc.) and the circumstances of the arrest. (UCR Handbook, NIBRS Edition, 1992, p. 55)

**Meets UCR Guidelines**

Comments:

**Administrative Clearing Results**

**Clearances:**

3.0 In order to clear an offense by exceptional means, each of the following four conditions must be met (UCR Handbook, NIBRS Edition, 1992, p. 34)

1.  "The investigation must have clearly and definitely established the identity of at least one offender."
2.  "Sufficient probable cause must have been developed to support the arrest, charging, and prosecution of the offender."
3.  "The exact location of the offender must be known so that an arrest could be made."
4.  "There must be a reason outside the control of law enforcement which prevents the arrest."

**Meets UCR Guidelines**

4.0 "The administrative closing of a case or the "clearing" of it by departmental policy does not permit exceptionally clearing an offense." (UCR Handbook, NIBRS Edition, 1992, p. 34))

**Meets UCR Guidelines**

**Comments:**

**Jurisdiction**

5.0 "To be certain that data is not reported more than once by overlapping jurisdictions." (UCR Handbook, NIBRS Edition, 1992, p. 6)

- a.  "Agencies report only those offenses committed within their boundaries."

**Meets UCR Guidelines**

- b.  "The recovery of property is reported only by the agency that first reported it missing and/or stolen, regardless of who or what agency recovered it." (UCR Handbook, NIBRS Edition, 1992, p. 6)

**Meets UCR Guidelines**

- c.  "Agencies report only those arrests made for offenses committed within their own boundaries/jurisdictions." (UCR Handbook, NIBRS Edition, 1992, p. 6)

**Meets UCR Guidelines**

**Comments:**

**UNIVERSITY OF ARKANSAS**

**Property Values**

6. "Property information is to be submitted separately for each type of property loss..." (UCR Handbook, NIBRS Edition, 1992, p. 41)

**Meets UCR Guidelines**

7. "Agency considers the following guidelines in the evaluation of property: (UCR Handbook, NIBRS Edition, 1992, p. 43 - 44)

- a. "Use fair market value..."
- b. "Use cost to the merchant (wholesale cost)..."
- c. "Use victim's evaluation..."
- d. "Use replacement cost or actual cash cost..."
- e. "When the victim obviously exaggerates the value of stolen/destroyed/damaged property for insurance or other purposes, common sense and good judgment will dictate a fair market value to be placed on the stolen items by law enforcement."

**Meets UCR Guidelines**

8. "The theft of nonnegotiable instruments such as traveler's checks, personal checks, money orders, stocks, bonds, food stamps, etc., should be scored but no value recorded." (UCR Handbook, NIBRS Edition, 1992, p. 44) "Nonnegotiable instruments, documents requiring further action to become negotiable, e.g., undorsed checks and undorsed money orders..." (NIBRS, Volume 1: Data Collection Guidelines, 2000, p. 82)

**Meets UCR Guidelines**

9. "If the value is unknown, one dollar (\$1.00) which means unknown, i.e., Unknown should be entered." (NIBRS, Volume 1: Data Collection Guidelines, 2000, p. 86)

**Meets UCR Guidelines**

10. "...in order to obtain some measure of the drug problem, the 'estimated quantity' of seized drugs or narcotics is to be reported." (UCR Handbook, NIBRS Edition, 1992, p. 45)

**Meets UCR Guidelines**

11. "...when drugs are involved in other types of crime (e.g., they were stolen in a burglary or burned in an arson) their value is to be reported" (UCR Handbook, NIBRS Edition, 1992, p. 45)

**Meets UCR Guidelines**

**Law Enforcement Officers Killed or Assaulted (LEOKA)**

*Any questions regarding LEOKA, call CSAMU 5-4831.  
(UCR Handbook, NIBRS Edition, 1992, p. 61 - 65)*

16. "The form entitled 'Law Enforcement Officers Killed or Assaulted' (LEOKA) is to be used by agencies to report line-of-duty felonious or accidental killings of and assaults on sworn law enforcement officers." (UCR Handbook, NIBRS Edition, 1992, p. 61)

**Meets UCR Guidelines**

17. "Officers Killed" relates to sworn officers with full arrest powers killed in the line of duty. The number of officers slain by felonious acts and those killed by accident or negligence should be entered (on this form, LEOKA)." (UCR Handbook, NIBRS Edition, 1992, p. 61)

**Meets UCR Guidelines**

18. "All assaults on officers with or without injuries should be included on this form (LEOKA)." (UCR Handbook, NIBRS Edition, 1992, p. 65)

**Meets UCR Guidelines**

Comments:

**Updating / Quality Assurance:**

19. "Updated information is to be reported to the national program on discovery of an additional unreported offense, victim, and/or offender; a subsequent arrest or exceptional clearance; discovery of a significant amount of unreported property loss; the recovery of stolen property; or the incorrect entry of important data, such as the offense code, the victim's or arrestee's sex or race, etc." (NIBRS Volume 1: Data Collection Guidelines, 2006, p. 18)

**Meets UCR Guidelines**

Comments:

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**State Program Services**

20. Submission Frequency:

**Monthly**

Comments:

	Overreported	Underreported	Inaccurate	
1. Call Number	0	0	0	0
2. Incident Number	0	0	0	0
3. Incident Date / Hour	0	0	0	0
4. Reported Exactness	0	0	0	0
5. Ex. Description	0	0	0	0
7. Attendant / Copied	0	0	0	0
7B. Description of Injury	0	0	0	0
8A. Date of Incident	0	0	0	0
8. Location Type	0	0	0	0
9B. Division / District	0	0	0	0
21. Method of Injury	0	0	0	0
22. Incident Agency	0	0	0	0
3. Victim / Person	0	0	0	0
4. Property Loss	0	0	0	0
5. Property Description	1	0	5	6
6. Property Value	0	0	1	1
7. Date Reported	0	0	0	0
8. Status of	0	0	0	0
9. Reported By	0	0	0	0
21. Suspected Drug Type	0	0	0	0
22. Est. Drug Quantity	0	0	0	0
23. Drug Measurement	0	0	0	0
24. Victim Address	0	0	0	0
25. Type of Vehicle	0	0	0	0
26A. Type of Vehicle	0	0	0	0
26B. Description of Vehicle	0	0	0	0
28. Age of Victim	0	0	0	0
29. Sex of Victim	0	0	0	0
30. Race of Victim	0	0	0	0
36. Ethnicity of Victim	0	0	0	0
38. Date of Incident	0	0	0	0
39. Agency / District	0	0	0	0
40. Date of Report	0	0	0	0
41. Reported By	0	0	0	0
42. Date of Report	0	0	0	0
43. Date of Arrest	0	0	0	0
44. Date of Arrest	0	0	0	0
45. Date of Arrest	0	0	0	0
46. Date of Arrest	0	0	0	0
47. Date of Arrest	0	0	0	0
48. Date of Arrest	0	0	0	0
49. Date of Arrest	0	0	0	0
50. Date of Arrest	0	0	0	0
51. Date of Arrest	0	0	0	0
52. Date of Arrest	0	0	0	0
53. Date of Arrest	0	0	0	0
54. Date of Arrest	0	0	0	0
55. Date of Arrest	0	0	0	0
56. Date of Arrest	0	0	0	0
57. Date of Arrest	0	0	0	0
58. Date of Arrest	0	0	0	0
59. Date of Arrest	0	0	0	0
60. Date of Arrest	0	0	0	0
61. Date of Arrest	0	0	0	0
62. Date of Arrest	0	0	0	0
63. Date of Arrest	0	0	0	0
64. Date of Arrest	0	0	0	0
65. Date of Arrest	0	0	0	0
66. Date of Arrest	0	0	0	0
67. Date of Arrest	0	0	0	0
68. Date of Arrest	0	0	0	0
69. Date of Arrest	0	0	0	0
70. Date of Arrest	0	0	0	0
71. Date of Arrest	0	0	0	0
72. Date of Arrest	0	0	0	0
73. Date of Arrest	0	0	0	0
74. Date of Arrest	0	0	0	0
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76. Date of Arrest	0	0	0	0
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79. Date of Arrest	0	0	0	0
80. Date of Arrest	0	0	0	0
81. Date of Arrest	0	0	0	0
82. Date of Arrest	0	0	0	0
83. Date of Arrest	0	0	0	0
84. Date of Arrest	0	0	0	0
85. Date of Arrest	0	0	0	0
86. Date of Arrest	0	0	0	0
87. Date of Arrest	0	0	0	0
88. Date of Arrest	0	0	0	0
89. Date of Arrest	0	0	0	0
90. Date of Arrest	0	0	0	0
91. Date of Arrest	0	0	0	0
92. Date of Arrest	0	0	0	0
93. Date of Arrest	0	0	0	0
94. Date of Arrest	0	0	0	0
95. Date of Arrest	0	0	0	0
96. Date of Arrest	0	0	0	0
97. Date of Arrest	0	0	0	0
98. Date of Arrest	0	0	0	0
99. Date of Arrest	0	0	0	0
100. Date of Arrest	0	0	0	0
<b>Totals</b>				

NOTE:  
 OPE data element discrepancies discovered (excluding classification data element & errors) are provided for administrators only to identify systemic technical issues or areas where additional training may be needed.  
 Overreported and Underreported discrepancies found in data elements 1, 14, 15, 21, 34 and 40 would result in additional discrepancies.

	Overreported	Underreported	Inaccurate	
01. Account Number	0	0	0	0
02. Account Number	0	0	0	0
03. Account Date	0	0	0	0
04. Type of Account	0	0	0	0
05. 2010 Account Date	0	0	0	0
06. Account Status	0	0	0	0
07. Agent Account	0	0	0	0
08. Date of Account	0	0	0	0
09. Name of Account	0	0	0	0
10. Address of Account	0	0	0	0
11. Telephone of Account	0	0	0	0
12. Email Address of Account	0	0	0	0
<b>Totals</b>				

NOTE:  
 Other data element discrepancies discovered (excluding classification data element 6 errors) are provided for information only to identify systemic technical issues or areas where additional training may be needed.  
 Overreported and Underreported discrepancies found in data elements 1, 4, 12, 23, 32 and 40 would result in additional discrepancies.