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FEB 19 2004

Mr. Terrell Harrison
President and CEO
National Education Center – Spartan School of Aeronautics
Tulsa International Airport
8820 E. Pine St.
P.O. Box 582833
Tulsa, Oklahoma 74158-2833

Dear Mr. Harrison:

This **Final Audit Report** (Control Number ED-OIG/A06-D0016) presents the results of our audit of National Education Center – Spartan School of Aeronautics' compliance with Student Financial Assistance program eligibility requirements, under Title IV of the Higher Education Act of 1965, as amended (HEA). Our objective was to determine if National Education Center – Spartan School of Aeronautics (NEC) disbursed Title IV aid to students enrolled in ineligible, non-degree Federal Aviation Administration (FAA) certified flight-training programs.

A draft of this Office of Inspector General (OIG) report was provided to NEC. NEC did not agree with our finding and recommendations. We have summarized NEC's comments after the Recommendation section in this report. A copy of NEC's response is included as an Attachment to this report.

BACKGROUND

NEC is a proprietary school, and its main campus is in Tulsa, Oklahoma. The school received initial approval to participate in the Title IV, Student Financial Assistance programs on March 24, 1967. The Accrediting Commission of Career Schools and Colleges of Technology (Accrediting Agency) accredited NEC. The school is licensed by the Oklahoma Board of Private Vocational Schools (State Agency) and certified by the FAA.

NEC offers flight-training programs in which students may earn baccalaureate degrees, associate degrees, or Professional Pilot non-degree diplomas. The Professional Pilot non-degree diploma (diploma) program is intended for individuals with no previous flight experience who want to obtain the necessary FAA ratings to become a professional pilot. At NEC, these individuals can enroll in one of three diploma programs, ranging in length from 57 credit hours to 71 credit hours.

Each of the three non-degree diploma programs provide core ground school and flight courses that allow a student to earn a Private Pilot rating, Commercial Pilot rating, and Instrument rating (Professional Pilot Core Courses) from the FAA. The three non-degree diploma programs also offer the Certified Flight Instructor rating and the following additional FAA ratings:

- Certified Flight Instructor Instrument, under the 57-credit-hour Professional Pilot Option 1 (PP1) program, offered from January 1, 1991, to May 1, 1998, as a 76-credit-hour program.
- Multiengine, under the 57-credit-hour Professional Pilot Option 2 (PP2) program, first offered in 1998.
- Certified Flight Instructor Instrument, Multiengine Flight Instructor, and Multiengine, under the 71-credit-hour Professional Pilot Option 3 (PP3) program, first offered in 1998.

NEC also offers other Title IV eligible programs; in total, NEC disbursed over \$19 million in Title IV aid for the award year July 1, 2000, through June 30, 2001. This amount included \$15.51 million in Federal Family Education Loan (FFEL) Program loans (PLUS, Subsidized, and Unsubsidized Loans), \$3.22 million in Federal Pell Grants (Pell), \$187,956 in Federal Supplemental Educational Opportunity Grant (FSEOG), and \$86,490 in Federal Work Study (FWS).

AUDIT RESULTS

NEC disbursed Title IV aid to students enrolled in two ineligible programs. We concluded that although the Department of Education (Department) approved only one program, the 57-credit-hour PP1 “Aircraft Pilot and Navigator (Professional)” program, NEC disbursed Title IV aid for attendance in two additional Professional Pilot programs (PP2 and PP3) that were not approved by the Department. For the period July 1, 2000, through June 30, 2002, NEC disbursed approximately \$312,000 in Title IV aid to students enrolled in these two ineligible programs.

Title IV Program Eligibility Requirements

If a school adds a program after it has become eligible to participate in the Title IV programs, that program may, under certain circumstances, be considered eligible for Title IV funds without notification to the Department. However, this interim program eligibility does not continue indefinitely. When the school’s eligibility is recertified, the school must report that new program on the Application for Approval to Participate in the Federal Student Financial Aid Programs (Application) it submits to the Department.

- “An eligible institution that adds an educational program after it has been designated as an eligible institution by the Secretary does not have to apply to the Secretary to have that additional program designated as an eligible program of that institution if the additional program . . . [p]repares students for gainful employment in the same or related recognized

occupation as an educational program that has previously been designated as an eligible program at that institution by the Secretary” (34 C.F.R. § 600.10(c)(2))

- “If an institution participates in the title IV, HEA programs, the Secretary’s designation of the institution as an eligible institution under the title IV, HEA programs expires when the institution’s program participation agreement . . . expires.” (34 C.F.R. § 600.10(d)(1))
- “A currently designated eligible institution . . . must apply to the Secretary for a determination that the institution continues to meet the requirements in this part and in 34 CFR part 668 if the institution wishes to . . . [c]ontinue to participate in the title IV, HEA programs beyond the scheduled expiration of the institution’s current eligibility and certification designation” (34 C.F.R. § 600.20(b)(2)(i))
- “To satisfy the requirements . . . of this section, an institution must apply in a format prescribed by the Secretary for that purpose and provide all the information and documentation requested by the Secretary to make a determination of its eligibility and certification.” (34 C.F.R. § 600.20(d))
- Section E of the Department’s Application states, “Please provide the following information for each educational program that you are requesting be eligible to participate in federal student financial aid programs.” Items 26 through 28 in Section E request identifying and other information concerning each program the school wishes to be eligible for federal student financial aid.

The Institution Failed to Obtain Approval from the Department for Certificate Programs

According to its Financial Aid Administrator, NEC added the PP2 and PP3 programs to its curriculum in 1998. Since these programs are similar to the approved PP1 program, already offered by the school, and since they meet other regulatory requirements, NEC was not required to inform the Department immediately in order for PP2 and PP3 to be considered eligible programs, and students were eligible to receive Title IV funds to attend the two new programs.

However, when NEC was required to submit an Application for recertification, the Application it sent to the Department (updated on March 21, 2000) did not include the PP2 and PP3 programs. As a result, the Department did not approve PP2 and PP3 as eligible programs. Since NEC’s previous Program Participation Agreement (PPA) expired on June 30, 2000, the PP2 and PP3 programs lost Title IV eligibility on that date.

NEC may have obtained approval for its PP2 and PP3 programs as late as July 1, 2000, without an interruption of those programs’ eligibility for Title IV funds. NEC failed to seek this approval. The PP2 and PP3 programs were not included in NEC’s Application dated March 21, 2000, nor on a subsequent Application dated June 5, 2001, which reported a change of ownership. NEC’s June 1, 2000, Eligibility and Certification Approval Report (ECAR) reflects only one eligible Professional Pilot program.

On the ECAR, the Department lists programs that meet the program eligibility requirements. The 2000/2001 Student Financial Aid Handbook (Handbook) states—

The ECAR contains the most critical of the data elements that form the basis of the school's approval and also a list of the highest level of offering, any nondegree program or short-term programs, and any additional locations that have been approved for the SFA Programs.

For the purpose of our audit, we are questioning the approximately \$312,000 in Title IV aid disbursed to students enrolled in the PP2 and PP3 programs for the time period of July 1, 2000, through June 30, 2002, and the Title IV aid disbursed after June 2002, for periods during which the PP2 and PP3 programs were not approved by the Department.

RECOMMENDATIONS

We recommend that the Chief Operating Officer for Federal Student Aid require NEC to—

1. Take appropriate action to ensure that funds are not disbursed to students in PP2 and PP3 until program eligibility is established.
2. Refund to lenders PLUS loan funds of \$114,090, subsidized loan funds of \$71,034, and unsubsidized FFEL loans of \$82,622 for award years 2000/2001 and 2001/2002, plus applicable interest.
3. Refund to the Department Pell funds of \$37,203 and FSEOG funds of \$7,200 for award years 2000/2001 and 2001/2002.
4. Calculate and pay the amount of all Title IV funds disbursed to students at NEC enrolled in the PP2 and PP3 programs after June 30, 2002, plus applicable interest, for periods during which the Department did not approve those programs.

NEC'S COMMENTS

NEC did not concur with our finding and recommendations. A copy of the letter from NEC is included as an Attachment to this report. In its letter, NEC stated that—

- At the time of recertification in March 2000, the Case Management Team in Dallas advised NEC that since the three Professional Pilot Programs offered were essentially the same program, with three options, the program only needed to be reported once on the institution's application. NEC continued to act on this advice when it submitted its change of ownership application in July 2001, and did not list the programs separately.

- OIG auditors stated twice during the exit interview that PP2 and PP3 were in fact eligible programs, except for the reporting omission. The programs were approved by both the state licensing authority and accrediting agency. PP1 and PP2 have the same number of credit hours and include nearly identical courses, and there is no reason that the Department would not have approved the programs if NEC had included them on its application. NEC states, “The OIG argument elevates form over substance and is unreasonable.”
- The OIG has no basis for contending that program eligibility expired when NEC applied for recertification. According to 34 C.F.R. § 600.10(c)(3) an institution is only liable to repay the Secretary if it incorrectly determines a program meets all regulatory requirements. NEC does not believe that it made the wrong determination for the two additional Professional Pilot programs.
- External audits have not raised any issues related to program eligibility. Since March 2000 NEC has had three external audits conducted, none of which had any liability assessed or any findings related to program eligibility.

In addition, NEC did not agree with our recommendations. NEC asked us to recommend that the Chief Operating Officer for Federal Student Aid require NEC to submit a new application to the Department, which would include the two other versions of the Professional Pilot programs, and not require NEC to pay any amounts to lenders or to the Department.

OIG’S RESPONSE

We have not changed our finding or recommendations. NEC’s response did not provide any information to contradict the fact that the programs PP2 and PP3 have not been on its ECAR since March 2000.

NEC’s response stated that it was advised by the Dallas Case Management Team not to list the two additional programs on the ECAR; however, NEC did not provide sufficient detail or evidence to corroborate its position that it relied on advice from Case Management. NEC also stated that the three programs were essentially the same programs; however, NEC’s catalog shows the programs as separate programs, and each program received separate approval by the accrediting and state agencies. Although the programs’ core courses are the same, the ratings required for graduating are different and a student must specify one of the programs at registration. Since the three programs are separate programs, and all non-degree programs must be included on the ECAR, PP2 and PP3 are not eligible for Title IV.

The OIG auditors did not state at the exit conference that the programs were eligible, but that it appeared they may have been eligible, if they had been included on NEC’s Application. Section E of the Application states, “Please provide the following information for each educational program that you are requesting be eligible to participate in federal student financial aid

programs.” Since the two programs were not on the institution’s ECAR or Application, the two programs have not been approved by the Department and are not eligible for Title IV funds.

NEC stated that it did not incorrectly determine the eligibility of PP2 and PP3 programs when the programs were started in 1998. We are not questioning whether NEC incorrectly determined the eligibility of PP2 and PP3 when the programs started in 1998. Our audit looked at whether the additional programs were subsequently approved by the Department when the school was recertified. As we describe in our report, when the PPA expired in June 2000, the institution was required to include PP2 and PP3 on its Application, in order for those programs to continue their eligibility for Title IV funding. NEC did not include those programs in March 2000, and failed to include the two programs again during recertification for change in ownership in June 2001. As a result, PP2 and PP3 are not eligible to receive Title IV funds.

NEC did obtain the required annual compliance audit reports since March 2000, and we reviewed the compliance audit for the period of January 1, 2001, through December 31, 2001. Although the audit report did not have a finding related to program eligibility, that does not preclude the Office of Inspector General from reviewing program eligibility to ensure the institution meets applicable laws and regulations.

In response to NEC’s comment that OIG should recommend that NEC submit a new Application to add PP2 and PP3 to its ECAR, we added a recommendation that FSA take appropriate action to ensure that funds are not disbursed to students in these programs until eligibility is established.

OBJECTIVE, SCOPE, AND METHODOLOGY

Our objective was to determine if NEC disbursed Title IV aid to students enrolled in ineligible, non-degree FAA certified flight-training programs. To achieve our objective, we—

- Reviewed the program eligibility requirements contained in the HEA and regulations.
- Interviewed the NEC Financial Aid Administrator regarding the Title IV eligibility of flight training programs offered by the school.
- Reviewed licensing certifications from the Accrediting Agency, the State Agency, and the FAA to determine if the PP1, PP2, and PP3 programs were approved by other agencies.
- Reviewed the school’s 2000 catalog to determine what programs were offered.
- Reviewed the school’s Applications (last revised on 06/05/2001); 1997, 2000, and 2001 ECAR; and 2001 PPA to determine if offered programs were approved for Title IV eligibility.

NEC provided us with a universe of 62 students that school officials identified as Title IV recipients who were enrolled in the PP1, PP2, or PP3 program from July 1, 1998, through June 30, 2002. We judgmentally selected the first ten students listed in each of the three programs.

We reviewed the administrative and financial aid files for the 30 Title IV recipients to determine if NEC disbursed Title IV aid to students enrolled in ineligible programs.

Since we relied on computer-processed data obtained from school officials to identify our universe of 62 students enrolled in PP1, PP2, and PP3, we performed limited data reliability testing to ensure the completeness of this universe. To test for completeness, we extracted 5,298 Title IV recipients from the National Student Loan Data System (NSLDS) who were enrolled at NEC from July 1, 1998, through June 30, 2002. From the universe of 5,298, we selected a random sample of 50 Title IV recipients. We concluded that none of the students from the sample of the 50 recipients were enrolled in the PP1, PP2, or PP3 program from July 1, 1998, through June 30, 2002. Consequently, we concluded that the computer-processed universe of 62 Title IV recipients appeared to be complete and sufficiently reliable to formulate conclusions associated with the objectives of our audit.

We also relied on computer-processed data obtained from NSLDS for background information. To verify reliability, we performed limited tests of the data by comparing the data obtained from NSLDS to information obtained from NEC officials.

Our review of Title IV program eligibility requirements covered the period July 1, 1998, through June 30, 2002. Audit work was performed at NEC, Tulsa, Oklahoma, during March and April 2003. We discussed our preliminary results with NEC officials on April 4, 2003, and we held an exit conference with NEC officials on November 4, 2003. Our audit was conducted in accordance with generally accepted government auditing standards appropriate to the scope described.

STATEMENT ON MANAGEMENT CONTROLS

We did not assess the adequacy of NEC's management control structure applicable to the program eligibility requirement because this step was not necessary to achieve our audit objective. Instead, we relied on reviews of appropriate licenses and student files to determine if Title IV was disbursed to students enrolled in ineligible programs. Our testing disclosed instances of non-compliance with Federal regulations that led us to believe weaknesses existed. These weaknesses and their effects are discussed in the AUDIT RESULTS section of this report.

ADMINISTRATIVE MATTERS

Statements that managerial practices need improvements, as well as other conclusions and recommendations in this report represent the opinions of the Office of the Inspector General. Determinations of corrective action to be taken will be made by the appropriate Department of Education officials.

If you have any additional comments or information that you believe may have a bearing on the resolution of this audit, you should send them directly to the following U.S. Department of Education official, who will consider them before taking final Departmental action on this audit:

Ms. Theresa S. Shaw, Chief Operating Officer
Federal Student Aid
U.S. Department of Education
Union Center Plaza, Rm. 112G1
830 First Street, NE
Washington, DC 20202

It is the policy of the U.S. Department of Education to expedite the resolution of audits by initiating timely action on the findings and recommendations contained therein. Therefore, receipt of your comments within 30 days would be greatly appreciated.

In accordance with the Freedom of Information Act (5 U.S.C. § 552), reports issued by the Office of Inspector General are available to members of the press and general public to the extent information contained therein is not subject to exemptions in the Act.

If you have any questions or wish to discuss the contents of this report, please contact me, at 214-880-3031. Please refer to the control number in all correspondence related to this report.

Sincerely,

/Signed/

Sherri L. Demmel
Regional Inspector General
for Audit

Attachment



December 30, 2003

Ms. Sherri L. Demmel
Regional Inspector General for Audit
U. S. Department of Education
Office of Inspector General
1999 Bryan Street, Suite 2630
Dallas, TX 75201-6817

RE: National Education Center – Spartan School of Aeronautics
Tulsa International Airport
Control Number ED-OIG/A06-D0016

Dear Ms. Demmel:

NEC - Spartan School of Aeronautics (“Spartan”) is presenting our response to the Draft Audit Report cited above. It appears, from our conversations with the auditors, this audit is one of many audits being performed by the OIG specifically targeting flight schools.

BACKGROUND

Spartan was founded in 1928 and is celebrating its 75th Anniversary this year. Nearly 80,000 graduates have been employed in aviation and related industries as a result of their training at Spartan. We take great pride in delivering a quality education to our students and are equally proud of our track record regarding the administration of Title IV aid to students. Over the past four years our independent audits have had only minor findings and **zero liability** to the SFA programs. During this same period we have reduced our Perkins loan default rate from over 44% to less than 15% and have maintained our FFEL rate at an average rate of just over 15% for the past three years. Clearly, our primary objective is the proper administration of Title IV student aid and Spartan has committed significant resources to ensure this result.

AUDIT RESPONSE

Spartan disagrees with the findings in the audit for the following reasons:

1. Spartan was advised by the Dallas Regional Office of the Department of Education to only list Professional Pilot once on the application because the programs are essentially the same.

Due to the requirement in Title IV to add any non-degree programs to its application to participate, Spartan contacted the Case Management Team (“CMT”) at the Dallas Regional Office of the Department of Education when completing the electronic application in March, 2000. At that time, Spartan’s Director of Financial Aid solicited the advice of the CMT on how to list the Professional Pilot Diploma Program on the application. We explained the Professional Pilot Program, as described in the OIG Draft Report and the core courses that composed the majority of the Program. It was further explained that due to the nature of flight programs in general, students often selected various ratings depending upon their career goals at graduation. Spartan identified three options or electives of flight ratings that a student could choose to complete a Professional Pilot Program. The first and second options *have exactly the same number of credit hours* (i.e. 57 credit hours, see Exhibit A) even though different ratings are earned. The third option is a culmination of the first two with one additional rating. All three programs prepare the student to become employed as a Professional Pilot. The direction received at that time from the CMT was not to separately list Professional Pilot three times on the application because it was essentially the same program with three options, and as stated previously the credit hours for the first and second options are exactly the same. Spartan continued to act on the advice received when submitting the change of ownership application in July, 2001. We do not believe Spartan should be punished for following the Department of Education’s advice.

2. The Office of Inspector General’s auditors acknowledge all of the Professional Pilot options are, in fact, eligible programs.

Notwithstanding the fact that Professional Pilot Option One (“PP1”) and Professional Pilot Option Two (“PP2”) have the exact same number of credit hours, and that Spartan was told to list Professional Pilot only once on the application, the OIG auditors stated twice in the exit interview that Professional Pilot Option Two and Professional Pilot Option Three (“PP3”) were in fact eligible programs, except for the reporting omission. The programs were approved by both the state licensing authority and the accrediting agency before ever being offered. As such, to later say in the audit report they are somehow now “ineligible” is inaccurate.

Without admitting any wrongdoing (because we sincerely believe we properly complied with all Federal regulations on the subject) Spartan insists that any omission which may have occurred on the ECAR at any given time (i.e. March 2000, July 2001) was not harmful, was in accordance with regulation, and to the extent that any error was

committed was due solely to a miscommunication/misguidance with the Department. The OIG argument elevates form over substance and is unreasonable. There is no reason these programs would not have been approved by the Department of Education had the guidance received been to list the Professional Pilot Diploma Program three times on the application.

It is clear that “PP1” and “PP2” are exactly the same number of credit hours in length and consist of nearly identical courses. (See Illustration of Programs, Exhibit A) The notation “PP1” as opposed to “PP2” merely helps designate an option a student may choose to achieve a different flight rating at the culmination of their training. To now say that failing to separately list “PP2” from “PP1” should require repayment of hundreds of thousands of dollars, especially after Spartan was advised by the Department of Education it need not do so, is not factually or legally supportable. Simply put, this cause cannot constitute a finding of any liability on the issue.

3. Spartan did not incorrectly determine the eligibility of the programs.

As stated previously, the programs were approved by both the state licensing authority and the accrediting agency before ever being offered. Both programs are clearly within the scope of other programs already offered by Spartan. The OIG has no basis for the contention that the program eligibility expired upon applying for recertification. These programs were clearly eligible prior to recertification, even according to the OIG, and retain their eligibility on the same basis after recertification.

According to 34 C.F.R. 600.10(c)(3), the only reference that an “...institution is liable to repay to the Secretary all HEA program funds received,” is “If an institution *incorrectly* determines under paragraph (c)(2) of this section that an educational program satisfies the applicable statutory and regulatory eligibility provisions without applying to the Secretary for approval.”

Here, Spartan **correctly** determined PP2 and PP3 are in fact eligible programs because they clearly satisfied applicable statutory and regulatory eligibility provisions at issue. Further, the OIG auditors orally stated twice during the exit interview their agreement that the programs were eligible, but for the reporting omission. As such, any attempt to assert a liability here is inappropriate and unreasonable.

4. External audits conducted annually raised no issue with regard to program eligibility.

As mentioned in the background section, Spartan School of Aeronautics has a good track record with regard to audits. An independent, third party regularly conducts a thorough audit of the Student Financial Aid Programs and the issue of program eligibility has not been raised. Since the alleged omission first occurred, according to the OIG, March 2000, there have been three audits conducted. Not only has there been no liability cited in any of these audits, there has been no mention of any issue related to program eligibility.

SUMMARY

Spartan appreciates the opportunity to respond to the Draft Audit Report. Spartan realizes the OIG reviews many cases involving fraud and abuse, but that is not the situation at Spartan. Indeed, the auditors identified in their exit interview that the proper licensing and accreditation authorizations were obtained for both programs, which fell within the scope of Spartan's other program offerings. Accordingly, Spartan disbursed Title IV student aid to eligible students in two eligible programs. We should not be penalized for a technicality due to a miscommunication and urge the Office of Inspector General to revise their monetary recommendations to a recommendation of no repayment needed or sought.

If the result of this audit boils down to a mere scrivener's error of six (6) keystroke combinations on a computer, then Spartan readily agrees that the terms "PP2" and "PP3" were not listed separately. If the result of this audit boils down to the issue of correctness, fairness and accuracy, then the omission of the keystrokes "PP2" and "PP3" should not be cause for a finding of monetary liability.

PROPOSED RECOMMENDATIONS

Spartan does not agree with the recommendations in the Draft and proposes the Office of Inspector General recommend the following to resolve the alleged findings:

1. Require Spartan to immediately submit a new application to the Department of Education adding the two other versions of Professional Pilot to the ECAR.
2. Not require repayment of any Title IV Plus loan funds, FFEL loan funds, Pell Grant funds or FSEOG funds for any student or any award year.

We sincerely value our excellent regulatory relationship with the Department of Education and the privilege of administering Title IV funds. Hopefully upon review of this correspondence we can move toward a fair and final resolution of this matter. If we may be of further assistance, please feel free to contact us at 1-918-836-6886.

Sincerely,



Terrell "Terry" W. Harrison
President & CEO

Exhibit A

Illustration of Professional Pilot Diploma Programs

Professional Pilot Core Courses		PP1	PP2	PP3
AVE 1503	Aviation Regulations I	3	3	3
AVE 1513	Basic Aerodynamics & Systems	3	3	3
AVE 1553	Basic Meteorology & Navigation	3	3	3
AVE 1573	Basic Instruments	3	3	3
AVE 1613	Planning & Navigation	3	3	3
AVE 2503	Aviation Regulations II	3	3	3
AVE 2513	Advanced Aerodynamics	3	3	3
AVE 2553	Advanced Meteorology	3	3	3
AVE 2563	Advanced Aircraft Systems	3	3	3
AVE 2573	Advanced Instruments	3	3	3
AVE 2603	Air Traffic Control Operations & Procedures	3	3	3
AVF 1562	Private Pilot Certification Flying	2	2	2
AVF 1763	Commercial Pilot Certification Flying, Part I	3	3	3
AVF 2572	Instrument Rating Flying	2	2	2
AVF 2583	Commercial Pilot Certification Flying, Part II	3	3	3
Electives				
AVE 2613	Testing and Measurement	3	3	3
AVE 2633	Practical Certified Flight Instructor	3	3	3
AVE 2623	Educational Psychology	3		3
AVE 2643	Practical Certified Flight Instructor Instrument	3		3
AVE 2713	Multiengine Aerodynamics & Maneuvers		3	3
AVE 2753	Multiengine Systems & Operations		3	3
AVE 2823	Multiengine Fundamentals of Instruction			3
AVE 2833	Practical Multiengine Flight Instructor			3
AVF 2651	Certified Flight Instructor Flying	1	1	1
AVF 2671	Certified Flight Instructor Instrument Flying	1		1
AVF 2751	Multiengine Rating Flying		1	1
AVF 2831	Multiengine Flight Instructor Flying			1
Total Credits		57	57	71