



**Consumer  
Information Guide  
Addendum  
2016-2017**



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# Addendum

## Academic Year Definition Policy

### Overview

The Academic Year Definition Policy defines the academic year for all eligible programs.

### Policy

If a student is officially enrolled in a certificate or degree program at the University, the student's first academic year begins with the first required introductory course in the certificate or degree program and ends when the student successfully completes the credits and weeks of instructional time requirements. The second and any subsequent academic year begins when the student successfully completes the credit and week requirements of the first/prior academic year and ends when the student meets the credit and week requirements of the current academic year. If a student is a non-degree-seeking student and later enrolls in a certificate or degree, the coursework taken in the non-degree may apply to the certificate or degree program but is not counted as part of the academic year requirements.

The University's academic year is defined as a minimum of 24 credits and 36 weeks of instructional time for all eligible programs. A week of instructional time is a week (a consecutive seven-day period) in which one-day of instruction occurs. Instructional time does not include periods of vacation, orientation, or homework.

### Overlapping Academic Years

An academic year that begins before a previous existing academic year has ended is considered an overlapping academic year. This scenario is rare, but most commonly occurs when a student starts with the University after recently attending a different institution or when the student completes a prior program at the University and begins another program. Students in these scenarios need to work with their student advisor to determine if they have overlapping academic years and if their financial aid eligibility will be impacted. For further information on these specific types of scenarios, please refer to the External Transfer Policy and Advancing Programs Policy.

## Advancing Program Policy

### Overview

The Advancing Programs Policy addresses the University's treatment and determination of federal financial aid eligibility for students who advance programs (finish one program and begin another program) at the University.

### Policy

A student who graduates from a degree or certificate program at the University and begins a new program at the University is a student who is advancing programs. Federal financial aid awards are determined by the date at which the student begins the new program.

### New Academic Year

A student who graduates from one program at the University and begins another program after the expiration of the previous program's end of program (EOP) academic year is a student who is advancing programs with a new academic year.

For this scenario, the University will award the student all federal financial aid based on a full academic year as defined by the new program of study. (Refer to the Pell/IASG Policy, Direct Loan Policy, and Campus Based Policy for additional information on awarding and the Academic Year Definition Policy for information on defined academic years).

### Overlapping Academic Years

A student who graduates from one program at the University and begins another program prior to the expiration of the previous program's EOP academic year is a student who is advancing programs with overlapping academic years. The student is required to complete the academic year in terms of credits and instructional weeks.

For overlapping academic years, the University will determine the federal financial aid awards as follows:

### Federal Pell Grant Award

A student cannot receive more than his or her scheduled Pell award for a federal award year. (Refer to the Federal Pell Grant- IASG Policy for additional information). When a student has already received a Federal Pell Grant during the same federal award year, the University will determine the percentage of the scheduled Federal Pell Grant award that the student has already received in order to calculate the student's remaining eligibility (if any) for a Federal Pell Grant award.

To calculate the student's remaining eligibility, the University uses the following formula:

$$\text{Pell Disbursed in Prior Program} / \text{Scheduled Award in Prior Program} = \% \text{ of Scheduled Award Used}$$

The University then subtracts the percentage of scheduled award used from 100 to calculate the maximum percentage of the scheduled award the student may receive in the new program. The University determines the Federal Pell Grant Award the student is eligible for by using the following formula:

$$\text{Maximum \% of Scheduled Award Remaining} \times \text{Scheduled Award at University} = \text{Maximum Pell Award}$$

When calculating the student's Federal Pell Grant award, the University will also ensure the student does not exceed the Pell Lifetime Eligibility Used (Pell LEU).

The remaining Federal Pell Grant award amount is not divided equally across the payment periods in the new program. Instead, the Federal Pell Grant funds may be disbursed in an amount up to the student's remaining eligibility for each payment period, except that no payment period disbursement can exceed 50% of the scheduled annual award.

Federal Pell Grant Example:

A student graduates from the AAB program and advances to the BSBA program at the University. It is determined the student's academic year for the AAB program overlaps with the academic year for the BSBA program.

#### Pell Data from the Prior Program at the University

Scheduled Pell Award	\$4,000
Pell Award Disbursed	\$1,500

The University will determine the student's remaining Federal Pell Grant eligibility for the overlapping academic year in the BSBA program.

Pell Calculations by the University	
Scheduled Pell Award	\$4,000
Percentage of Pell already used in the prior program (Pell award disbursed / Scheduled Pell Award)	$\$1,500 / \$4,000 = 37.5\%$
Percentage of remaining Pell Eligibility (100% - used)	$100\% - 37.5\% = 62.5\%$
Student's remaining Federal Pell Award (Scheduled award at University x Percentage remaining eligibility)	$\$4,000 \times 62.5\% = \$2,500$

The student's remaining Federal Pell Grant eligibility is \$2,500 and because this amount is more than half of the scheduled Federal Pell Grant award of \$4000, the award must be disbursed in two payment periods. The student may receive half of the scheduled Federal Pell Grant award in the first payment period, and the remainder of the amount in the second payment period.

Pell Disbursements in the New Program at the University	
First Payment Period	\$2,000
Second Payment Period	\$ 500

#### Federal Direct Loan Award

The University will award a Direct Loan in the new program for the remainder of the prior program's EOP academic year. The loan period will cover the remaining credits and weeks of the overlapping academic year. The Direct Loan funds will not exceed the remaining balance of the student's annual loan limit at the loan level associated with the new program.

Direct Loan Example:

A student graduates from the AAB program and advances to the BSBA program at the University. It is determined the student's academic year for the AAB program overlaps with the academic year for the BSBA program. In the BSBA program, the student is a third year, independent undergraduate student with a maximum annual Subsidized Loan eligibility of \$5,500 and Unsubsidized Loan eligibility of \$7,000.

Direct Loan Data from the Prior Program at the University	
Subsidized Loan Disbursed	\$1,688
Unsubsidized Loan Disbursed	\$2,250

The University will determine the student's remaining Subsidized and Unsubsidized Loan eligibility for the overlapping academic year in the BS.BA program.

Direct Loan Calculations to Determine Remaining Eligibility for Overlapping AY	
Remaining Subsidized Loan Eligibility for Overlapping AY (Annual Subsidized Loan Limit - Subsidized funds already disbursed)	$\$5,500 - \$1,688 = \$3,812$
(Annual Unsubsidized Loan limit – Unsubsidized Loan funds already disbursed)	$\$7,000 - \$2,250 = \$4,750$

These remaining loan fund amounts will be disbursed based on the payment periods in the loan period at the University. (Refer to the *Disbursements Policy* for additional information)

### **Other Federal Aid Awards**

All other federal financial aid, including Federal Supplemental Opportunity Grant (FSEOG) will follow this same awarding process of finishing out the prior program's academic year.

## Allowable Charges Policy

### Overview

Federal regulations stipulate that when an institution disburses federal financial aid funds to a student by crediting a student's account it may do so for allowable charges. The Allowable Charges Policy defines what those allowable charges are at the University.

### Policy

#### Allowable Charges

The University defines allowable charges as charges assessed by the University for the current payment period for tuition. Authorization to apply federal financial aid funds to invoiced tuition charges for the payment period is not required.

#### Future Charges

The University defines estimated future charges for the current payment period as follows:

- Allowable charges that have not been charged to a student's account

Authorization from the student (or parent for PLUS loan) is required to apply federal financial aid funds to estimated future charges for the payment period. (Refer to the *Authorization to Hold Funds Policy for additional information.*)

#### Prior-Year Charges

The University does not use any Direct Loan funds in excess of \$200 to pay for prior-year charges. Authorization is not required for the University to use current-year Direct Loan funds to satisfy prior loan period charges of \$200 or less for tuition. The University does not apply any other type of federal financial aid funds (e.g. Pell and FSEOG) to prior year charges. (Refer to the *Financial Aid Authorization to Hold Funds Policy* for further information)



## Campus Based Programs Policy

### Overview

The Campus Based Policy defines the University's selection criteria and packaging philosophy for awarding campus-based funds consistently to all eligible students.

### Policy

The University participates in the Federal Supplemental Educational Opportunity Grant (FSEOG) Program. The University will make FSEOG funds reasonably accessible to all eligible students, to the extent of available funds. Furthermore, it will not exclude from consideration any one particular type or category of student.

### Federal Supplemental Educational Opportunity Grant (FSEOG)

The following represents selection criteria and procedures for determining which students may be awarded FSEOG funds. These selection procedures are uniformly applied.

#### First Selection Group

- Undergraduate students who have not earned a bachelor's or first professional degree
- Students eligible to receive Federal Pell Grant funding (based on EFC and credential level) during the same award year in which the campus-based funding will be disbursed
- Students with an EFC1 of zero and exceptional need are reviewed for funding under the following formula:

$$\begin{aligned} & \text{Cost of Attendance} \\ & - \text{EFC} \\ & - \text{Estimated Financial Assistance (EFA)*} \\ & = \text{Exceptional Financial Need of at least \$1,000} \end{aligned}$$

(Refer to the *Packaging Policy* for additional information).

After the University has determined the student's need, the University determines the student's eligibility.

The University first awards all funds to students meeting the conditions of the first selection group.

When all students in the first selection group are awarded and disbursed FSEOG program funds, the University will determine (towards the end of the award year, if funds are remaining) if students in the second selection group can be awarded.

#### Second Selection Group

- Undergraduate students who have not yet earned a bachelor's or first professional degree
- Students eligible to receive Pell Grant funding (based on EFC and undergraduate standing) during the same award year in which the campus-based funding will be disbursed
- Students with exceptional financial need (defined as students with the lowest EFC who are not receiving Pell Grants). This group also includes students who have exceeded their Pell LEU.

$$\begin{aligned} & \text{Cost of Attendance} \\ & - \text{EFC} \\ & - \text{Estimated Financial Assistance (EFA)*} \\ & = \text{Exceptional Financial Need of at least \$1,000} \end{aligned}$$

(Refer to the *Packaging Policy* for additional information).

The University keeps documentation of the eligible EFC calculated for the student and confirms Pell Grant eligibility prior to disbursement of the FSEOG. If the FSEOG recipient does not receive Pell Grant funds during the award year, but documentation shows the FSEOG award and disbursement were made in good faith, the University is not required to recover the FSEOG funds. If the student loses Pell Grant eligibility prior to disbursement of the FSEOG, the University will cancel the FSEOG award.

### **FSEOG and Pell Lifetime Eligibility Used**

If a student receives a Pell Grant for only one payment period of an award year due to reaching the Pell lifetime eligibility (LEU), the student may still receive an FSEOG award for both payment periods in the award year (Refer to the Federal Pell Grant/IASG Policy for further information on Pell LEU). If the student has met or exceeded the Pell LEU, the student does not fall under the first selection group criteria and is not eligible for any FSEOG awards in the award year. However, if funds remain after the first selection group has been paid; the student may be eligible for FSEOG under the second selection group criteria.

### **Establishing Categories of Students**

The University specifies categories of students to ensure students in each category have an opportunity to be awarded FSEOG funds. Categories may be based on class standing, enrollment status, program, date of application, or a combination of factors.

The University's written selection procedures ensure FSEOG recipients are selected based on the lowest

EFC and Pell Grant priority requirements over the entire award year. As the University enrolls students (as often as monthly or weekly), FSEOG funds are reserved for use throughout the award year (based on experiences from previous periods), and selection practices are applied in a manner that assures a reasonable consistency over the entire award year. Each year the University reviews prior award year data to determine the appropriate award amounts and allocations to ensure reasonable availability of funds throughout the award year.

### **Annual Award Amounts**

The annual award for each student may be up to \$1000.00, depending on availability and student eligibility. The minimum FSEOG amount is \$100. The award amount is disbursed equally in two payment periods within the academic year.

FSEOG is not prorated for graduating students with less than a full academic year remaining or for programs less than a full academic year.

### **Crossover Periods**

Crossover periods are payment, award, or loan periods that overlap two award years. If a student is receiving a Pell Grant during a payment period that occurs in two award years and the student is among those with the lowest EFCs, the student satisfies the FSEOG first selection group requirements for the same crossover period regardless of which award year the Pell Grant funds are attributed. A student can also receive FSEOG funds under the first selection group requirements during a crossover payment period, from either award year allocation, as long as the student also receives a Pell Grant in the award year to which the crossover payment period is attributed.

If the second payment period of an academic year starts before July 1 and the University awarded FSEOG using the first award year's allocation, the University will disburse those funds up until the September Federal Register deadline as long as the student is eligible for those funds.

If the second payment period of an academic year starts after July 1, the University awards the second FSEOG disbursement using the subsequent award year's funds if the student meets the eligibility criteria in the subsequent award year. This includes being eligible to receive Federal Pell Grant funding during the same award year in which the campus-based funding is disbursed. The University uses the original award year's cost of attendance (COA) and EFC in calculating the student's financial need and eligibility for aid from the FSEOG program.

### **Nonfederal Share Requirement for FSEOG**

The University meets its non-federal share of 25% using the fund-specific method.

The University has an established FSEOG fund into which it deposits FSEOG federal funds and the required 25% non-federal share. The matching funds are deposited at the same time the University receives the federal share funds. Awards to FSEOG recipients are then made from the mixed fund.

### **FSEOG Carry Forward and Carry Back**

The University may spend up to 10% of its current award year FSEOG allocation in the following award year. Carry forward funds are spent before the current year's allocation. The University may also spend up to 10% of its current year FSEOG allocation of expenses incurred in the prior award year.

Carry forward and carry back funds are matched in the award year they are spent. Information for both carry forward and back transactions are reported on the Fiscal Operations Report and Application to Participate (FISAP).

### **Recalculating Campus-Based Funds**

Any time a student at the University begins attendance in at least one course but does not begin attendance in all courses scheduled, the University checks to see if it is necessary to recalculate the student's eligibility for campus-based funds. This recalculation is based on the revised enrollment status and cost of attendance (COA). The University does not include any costs associated with classes the student failed to begin in the COA.

If the student withdraws from the University, this recalculation is performed prior to the completion of the Return of Title IV Funds calculation. The recalculated amounts of campus-based funds is used in the Return calculation.

### **Vocational Rehabilitation Funds**

For a student who qualifies for both federal financial aid funding and vocational rehabilitation assistance, the University will determine the student's eligibility exclusive of both costs related to the student's disability and anticipated vocational rehabilitation assistance.

### **Bureau of Indian Affairs Grants**

For a student who is or may be eligible for a Bureau of Indian Affairs (BIA) Grant, the University will first develop a financial aid award without considering any BIA funds. If the total funding, plus the BIA Grant does exceed need, the University will eliminate the excess in the following sequence: loans and grants other than Pell Grants. The University may alter this sequence of reductions based on the student's request.

### **Administrative Cost Allowance (ACA)**

The amount of ACA the University claims is determined by its expenditures for the FSEOG program.

- FSEOG disbursements to students – both the 75% federal share and the 25% nonfederal share.
- If the University chooses to provide more than a 25% institutional share to FSEOG recipients, it does not include an FSEOG institutional share in excess of 25% in the calculation of the ACA.

ACA is calculated as follows:

- 5% of the first \$2,750,000 of the University's expenditures to students under the Campus-Based Programs
- + 4% of expenditures to students greater than \$2,750,000 but less than \$5,500,000 under the Campus-Based Programs
- + 3% of expenditures to students greater than \$5,500,000 under the Campus-Based Programs

The University may use the ACA to assist in cost of administering the campus-based and Federal Pell Grant programs such as salaries, furniture, supplies, travel, and equipment. The ACA may also be used to pay service fees charged by banks for maintaining campus-based programs accounts, and expenses related to student consumer information requirements. If the University were to claim the ACA, it would come from the FSEOG allocation received. However, the University currently does not claim any ACA from the FSEOG program.

## Consortium Agreements Policy

### Overview

Written arrangements consist of consortium and contractual agreements. The Consortium Agreement policy documents the University's position on participating in consortium agreements with other institutions for the purpose of receiving or processing federal financial aid funds.

### Policy

The University chooses not to participate in consortium agreements, defined as written agreements between two or more federal financial aid (Title IV) eligible institutions. Therefore, the University will not provide signature or approval on any consortium agreement submitted, whether as a host or home institution.

## Cost of Attendance Policy

### Overview

The Cost of Attendance Policy addresses the cost of attendance (COA) established for use in calculating a student's amount of federal financial aid eligibility and awarding financial aid for a specific period of enrollment. The University uses the same COA when awarding Pell and Direct loans unless the student is a Pell or IASG only student. If the student is only receiving Pell or IASG, the Pell COA is used for awarding purposes. The COA consists of various components to determine eligibility for a period of enrollment. The University reviews and, if necessary, updates each component annually, referencing the College Board website and reviewing actual institutional data.

### Policy

The University uses an average monthly cost of living expense for all students based on nine months.

The University COA consists of the following components:

- Tuition
- Living Expense
  - Housing (food, housing, utilities, and miscellaneous household equipment)
  - Internet
  - Transportation
  - Miscellaneous (school supplies, personal expenses, and housekeeping supplies)
- Loan Fees

If a student is attending less than half time, the COA is made up of the following components:

- Tuition

### Tuition

Tuition rates are provided annually by the Financial Planning and Analysis Department (FP&A) for each college, upper division credit, and lower division credit for the upcoming award year. The tuition expense methodology for the COA is a weighted average based on modality and certificate and degree level. The University documents how averages are calculated and makes this information available upon request. Exceptions include professional judgment decisions and elimination of an over-award using actual tuition costs. (Refer to the *Professional Judgment and Over-award Policies* for more information.) If a student's period of enrollment is less than a full academic year, costs are adjusted to match the period of enrollment.

### Living Expenses

The monthly living expense component is a supplemental amount based on a student's attendance for the academic year definition. Students attend 8 hours a week, which is treated as one day and multiplied by the weeks of instructional time in the academic year definition. Students receiving military housing assistance (Basic Allowance for Housing or BAH) will have a reduction in living expenses in the amount of the housing allowance (excluding food).

### End of Program Periods

The end of program (EOP) COA is based on the credits required to complete the program and the weeks of instructional time, converted to months, needed to complete those credits. The months are rounded up and multiplied by the monthly living expense amount to determine the EOP COA.

The COA will not increase if a remaining period needs to be extended due to the student failing or withdrawing from a course(s) in the prorated period.

## Loan Fees

The University calculates an average loan fee by performing a separate calculation for undergraduate and graduate students.

## Incarcerated Students

The COA for incarcerated students is limited to tuition. (Refer to *Student/Parent Eligibility Policy* for further information).

## Tribal Budget

The University prepares a separate tribal budget for students who receive tribal funding. The tribal budget consists of actual tuition rates for the tuition component and may include a child/dependent care average component obtained from the National Association of Childcare Resource and Referral Agency (NACCRRRA). The University averages each childcare type for weekly and hourly cost for each state. Documentation is available for review, upon request.

## Direct Loan Policy

### Overview

The Direct Loan Policy addresses the application process for obtaining a Federal Direct Loan (DL), the applicable period of time for receiving a DL, and the maximum annual and aggregate amounts of DL a borrower may receive.

### Policy

#### Application Process

To obtain a direct loan (DL), a student must complete and submit a current award year Free Application for Federal Student Aid (FAFSA). Additional forms, such as the Loan Request Form, Direct Loan Master Promissory Note (MPN), and/or Direct Loan Entrance Counseling (if first time borrower) may also be needed.

Once completed documents are received, the University will determine the student's eligibility for the Direct Loan program and award accordingly. The University will send out a notification of the proposed loan package via an award letter to include the proposed loan type(s) and amount(s). Once the award is made, the University will transmit the loan origination and disbursement record to the U.S. Department of Education (ED). ED will provide an origination acknowledgement confirming the student has a completed Master Promissory Note (MPN) and is eligible for the Direct Loan program funds awarded. Prior to the anticipated disbursement date, the student's eligibility for the Direct Loan program funds is reconfirmed and loan funds are drawn-down from ED and disbursed to the student by application to the student account with the University.

#### MPN Confirmation

The University uses the multi-year MPN and practices an active confirmation process for all borrowers who borrow under the Direct Loan Program. The University requires a student to submit a new MPN if no Direct Loan disbursements are made within one year of the original sign date of the MPN. The University originates the loan(s) based on the student and/or parent's requested loan amount(s) received during the financial aid application process each FAFSA award year. A request for an increase or decrease to the requested loan amount may be made by submitting the FA Change Form. If the amount(s) of Direct and/or Federal Direct PLUS (PLUS) loans requested exceeds the student's cost of attendance (COA), the University only originates up to the COA.

Once the loan has disbursed, the University sends the student/parent a Right to Cancel letter, which includes the time given to respond should the student and/or parent borrower wish to cancel their loan request(s). This notification is mailed after the loan disbursement has been credited to the student's account. Borrowers who wish to cancel all or a portion of their loan must inform the University within 30 days from the date the University sends the disbursement notification. Any requests received after the 30 days but prior to 110 days will be honored as a partial cancellation based on title IV funds that are currently unapplied. The University notifies the student/parent in writing of the outcome of his or her request regardless of when the cancellation request is received.

#### Loan Period

The minimum period of enrollment the University may originate a Direct Loan is the lesser of the following:

- The length of the student's program
- The student's academic year (a minimum of 24 earned credits and at least 36 instructional weeks completed)
- The remaining portion of the student's program (if the program is shorter than an academic year).

The maximum period the University may originate a Direct Loan is

- Generally, the student's academic year (a minimum of 24 earned credits and at least 36 instructional weeks completed); or
- For a defaulted borrower who has regained eligibility, the academic year the borrower regained eligibility.

*Note: Refer to External Transfer, Advancing Programs, and Program Changes Policies for information on loan periods for students who transfer from another school, complete a program and advance to another program, or change programs at the University.*

#### Annual Loan Limits for Subsidized and Unsubsidized Loans

Grade Level	Dependent Undergraduate Student	Independent Undergraduate Student	Graduate/Professional Student
(1) Freshman	\$5,500 (base) (no more than \$3,500 of this amount can be a subsidized loan)	\$9,500 (base) (no more than \$3,500 of this amount can be a subsidized loan)	\$20,500
(2) Sophomore	\$6,500 (base) (no more than \$4,500 of this amount can be a subsidized loan)	\$10,500 (base) (no more than \$4,500 of this amount can be a subsidized loan)	
(3 & 4) Junior and Senior (5) Fifth year undergraduate	\$7,500 (base) (no more than \$5,500 of this amount can be a subsidized loan)	\$12,500 (base) (no more than \$5,500 of this amount can be a subsidized loan)	
A student whose parents cannot obtain a PLUS Loan is allowed to borrow additional Direct Unsubsidized Loan amounts. Student dependency status will be determined based on answers to questions on the Free application for Federal Student Aid (FAFSA).			

Students may attend another school(s) while attending the University and receive Direct/PLUS loans at both annual loan limit over-award by reducing and/or cancelling loan disbursements to ensure students do not exceed annual loan limit amounts.

### Aggregate Loan Limits for Subsidized and Unsubsidized Loans

If a student at the University has received federal loans at other schools, the University reviews the student's Financial Aid history on the institutional student information record (ISIR) to ensure the student has remaining eligibility under the aggregate loan limits. If a student exceeds the aggregate loan limits, the student may not receive additional direct loans until the student (1) repays in full the excess loan amount; or (2) makes arrangements, satisfactory to the holder of the loan, to repay the excess loan amount.

When reviewing NSLDS, the University uses the Aggregate Outstanding Principal Balance (Agg. OPB) shown in NSLDS for each of the student's outstanding federal loans. If the student has one or more consolidation loans, which may include Subsidized and Unsubsidized federal loans, NSLDS will show separate totals for each. The University is not responsible for reviewing "unallocated" loans if they are present in NSLDS.

The following represents the maximum outstanding total subsidized and unsubsidized loan debt:

	Subsidized	Total (subsidized & unsubsidized)
<b>Dependent Undergraduate Students (excluding those whose parents cannot borrow PLUS)</b>	\$23,000	\$31,000
<b>Independent Undergraduate Students &amp; Dependent Undergraduate Students whose parents cannot borrow PLUS</b>	\$23,000	\$57,500
<b>Graduate &amp; Professional Students</b>	\$65,500	\$138,500

### Maximum eligibility period to receive Direct Subsidized Loans

Borrowers who have no outstanding balance on a Direct Loan or on a Federal Family Education Loan

(FFEL) on July 1, 2013, or on the date the borrower obtains a Direct Loan after July 1, 2013 will have Direct Subsidized Loan eligibility limited to a period not to exceed 150 percent of the length of the borrower's educational program.

Under certain conditions, the first-time borrowers who have exceeded the 150 percent limit may lose the interest subsidy on their Direct Subsidized Loans. ED will monitor this subsidized usage and notify borrowers through disclosure statements provided to the borrowers.



### Additional Unsubsidized Eligibility

Independent undergraduate, graduate or professional students may borrow additional unsubsidized annual loan amounts.

Dependent undergraduate students, whose parents are unable to borrow PLUS loans due to adverse credit or other documented exceptional circumstances, may borrow additional unsubsidized annual loan amounts. Exceptional circumstances include, but are not limited to, circumstances in which the student's parent receives only public assistance or disability benefits, is incarcerated, has an adverse credit history, or the parent's whereabouts are unknown. A parent refusal to borrow a Federal PLUS loan or Direct PLUS loan does not constitute exceptional circumstances.

Dependent undergraduate students, whose parents have ended financial support and refuse to file the FAFSA, may be eligible for unsubsidized loans. In these scenarios, the University verifies that the parents have ended financial support and refuse to file the FAFSA based upon documentation submitted by the dependent student. These students must complete and submit a FAFSA that includes all the required student information. They are eligible to receive only an unsubsidized loan and not any other federal financial aid assistance. The maximum annual unsubsidized loan amount they may receive is the "base" annual loan limit for the student's grade level plus the additional \$2,000 unsubsidized amount.

### Loan Origination Date

The date of a loan origination is the date the University creates the electronic loan origination record. In the University's PeopleSoft system, this date is referred to as the loan certification date. The University will not originate a direct loan for a loan period in which the student is no longer enrolled at least half time, even if the student is otherwise still enrolled at the University. The University does not keep any funds originated after the student's loan period end date.

### Annual Loan Limit Progression

The student's academic year is used as the basis for annual loan limits. To advance to the next grade level and for annual loan limit purposes, the student must successfully complete and earn the weeks and credit hours in the academic year (minimum of 24 credits and 36 weeks of instructional time).

If the University accepts transfer credits for a student transferring from another school into a program at the University that is greater than one academic year in length, the University uses the loan limits associated with the grade level based on the credits accepted.

### Prorating Annual Loan Limits (34 CFR 685.203)

Students enrolled in programs less than an academic year will have their DL amounts prorated. The annual loan limit for these programs is based on the lesser of –

$$\frac{\text{Annual loan limit} \times \text{Credit hours enrolled in the program}}{\text{Credit hours in the academic year}}$$

**Or**

$$\frac{\text{Annual loan limit} \times \text{Weeks enrolled in the program}}{\text{Weeks in the academic year}}$$

In addition, students enrolled in undergraduate programs with a remaining period of study shorter than a full academic year as measured in credit hours will have their DL amounts prorated based on -

$$\frac{\text{Annual loan limit} \times \text{Credits in the program}}{\text{Credits in the academic year}}$$

*Example:* An independent, second year student is enrolled in the AAB program. He has a remaining period of enrollment consisting of 12 credit hours. A full academic year at the University is defined as 24 credit hours.

Direct Loan Calculations to Determine Eligibility for Remaining Period of Enrollment	
Maximum Subsidized eligibility for remaining period of enrollment	$(12/24) \times \$4,500 = \$2,250$
Maximum Unsubsidized eligibility for remaining period of enrollment	$(12/24) \times \$6,000 = \$3,000$

In the proration scenario described above, standard rounding rules apply.

*Note: The proration formulas determine the maximum loan amount a student may borrow for a remaining period of enrollment, not the loan amount the student may actually receive. In some cases, the actual loan amount the student is eligible to receive may be less than the prorated loan limit. (Based on costs, EFC, other aid, aggregate borrower, etc.).*

## Disbursements Policy

### Overview

The University may only disburse federal financial aid funds to eligible students, as mandated by federal regulations. The Disbursements Policy addresses standard disbursements, late disbursements, and post withdrawal disbursements.

### Policy

#### Standard Disbursement

A student is eligible to receive the first disbursement of federal financial aid funds when the University confirms the student is enrolled in courses for the payment period and is eligible to receive the funds. The student becomes eligible to receive a disbursement of federal financial aid funds for the second payment period when the student successfully completes one-half the weeks of instructional time AND earns one-half the credit hours in the defined academic year. Typically, the University will disburse funds once the student successfully completes half the credits and weeks of instruction in the current academic year, which may consist of more credit hours and weeks of instruction than the defined academic year.

If the payment periods are not equal in credit hours and weeks of instructional time, the first payment period will consist of more credit hours and/or weeks of instructional time to ensure at least one-half the credit hours and one-half the weeks of instructional time in the academic year have been completed. Occasionally, when a student's file is reevaluated, the second payment period may consist of more credit hours and weeks of instructional time than the first payment period.

For a remaining period that is more than one-half an academic year, the second disbursement of the remaining period is made once the student successfully completes one-half of the weeks of instructional time AND earns one-half the credits in the remaining period. If the remaining period is equal to or less than one-half an academic year, the second disbursement of the remaining period may not be disbursed until the student successfully completes one-half the weeks of instructional time AND earns one-half the credit hours in the remaining payment period.

The University will disburse loan proceeds in substantially equal installments, and no installment will exceed one-half of the loan amount. First time, first-year undergraduate borrowers will not have the first installment of Direct loan proceeds disbursed until 30 calendar days after the program of study academic year begins. The University will schedule disbursements according to procedures.

Before disbursing federal financial aid funds, the University will determine and document the student remains eligible to receive federal financial aid funds.

The University will disburse federal financial aid funds by crediting the student's account no later than three business days after receiving the funds. Funds in excess of allowable charges will be paid directly to the student unless otherwise authorized in writing by the student. (Refer to the *Authorization to Apply Funds* and *Federal FA Credit Balance Hold* policies for additional information.)

#### Right to Cancel

Before the University disburses federal financial aid funds, the University will notify the student of the amount of funds that the student (or parents in the case of PLUS loans) can expect to receive under each federal financial aid program and how and when those funds will be disbursed.

The University will notify the student (or parent) of the amount of the federal aid disbursement, the student's (or parent's) right to cancel all or a portion of the loan or loan disbursement and have the proceeds returned to the holder of the loan. The notice will also include the procedures and time by which the student (or parent) must notify the University that he/she wishes to cancel the loan or loan disbursement. This notice will be sent to the student/parent no later than seven days after crediting the student's account at the University. The student/parent will have 30 days from the date the University notifies him/her of the disbursement to cancel all or a portion of the loan.

### Repeat Coursework

If a student attempts a course with the final grade of either a Withdraw (W) or Fail (F) and course credits are NOT earned, the student may receive federal financial aid funds when the course is repeated. There is no change or increase in the federal financial aid awarded for the period because the student is still required to meet all academic year and payment period completion requirements before additional or subsequent federal financial aid awards or disbursements are made.

Once a student meets the minimum requirements of a course, receives a passing grade and earns credit for that course, federal financial aid funds will not be applied to any subsequent attempts of that course, except for the following:

- 1) If a student completes an entire program at the University and enrolls in that same program or another program at a later date, the University will apply federal financial aid funds to the repeated course required in that program.
- 2) If a student reenters the same program or a new program at the University after 180 days of nonattendance, the University will apply federal financial aid funds to any repeated course taken when the student returns.

If a student passes a course but retakes the course to earn a better grade, the student will not receive federal financial aid funds for the repeat course nor will the credits and weeks count toward the academic year completion requirements.

### Late Disbursement

Students or parents become ineligible to receive federal financial aid funds on the date the student:

- For Direct Loans, is no longer enrolled at least half time; or
- For Federal Grants, the student is no longer enrolled at the University for the award year

If a student completes a payment period or period of enrollment, withdraws during a payment period or period of enrollment, or graduates, the University must make or offer the student (or parent in the case of a PLUS loan) a late disbursement of federal financial aid funds, for which the student (or parent in the case of a PLUS loan) was eligible while in attendance at the University.

The following conditions must be met prior to the date the student (or parent) became ineligible for a late disbursement.

Program		
Pell Grant/IASG	For programs, the Department processed a SAR/ISIR with an official EFC	No additional requirements
FSEOG		Student is awarded grant
Direct Loans		A loan record is originated
<b>The following additional limitations must be satisfied before the University may make a late disbursement</b>		
Pell Grant/IASG	For all Title IV programs, the University received a valid SAR/ISIR by the date established by ED.	
FSEOG	No additional limitations	
Direct Loans	<ol style="list-style-type: none"> <li>1. For a first-year, first-time borrower, the student completed 30 days of the program</li> <li>2. For a second disbursement, the student graduated or completed the period for which the loan was intended.</li> </ol>	

### Paying a Late Disbursement of Federal Financial Aid Grant Funds

Without the student’s permission, the University may credit a student’s account with a late disbursement of federal financial aid grant funds for current allowable charges. The University will obtain the student’s written authorization to credit the student’s account with federal financial aid grant funds for charges other than current charges. If federal financial aid grant funds remain to be disbursed from a late disbursement after all eligible outstanding charges on the student’s account have been satisfied, the University will pay the grant funds directly to the student within 14 days.

The University will make a late disbursement to the student no later than 180 days after the date of the University's determination the student withdrew, or for a student who did not withdraw, 180 days after the date the student became ineligible.

### **Paying a Late Disbursement of Federal Financial Aid Loan Funds**

Prior to the University making any late disbursement of federal financial aid loan funds, the borrower will be notified and an explanation given as to the student's obligation to repay the loan funds disbursed. The student will be given an opportunity to accept or decline the loan. The student's authorization to receive the loan must be submitted via the late disbursement letter or via a signed statement submitted to the University titled "Late Disbursement Notification."

The student will have 30 days from the date on the late disbursement letter to return the letter to the University; otherwise, the loan funds will be canceled. The University will make the late disbursement to the student no later than 180 days after the date of the University's determination the student withdrew or became ineligible. If the student had a federal financial aid credit balance before becoming ineligible, and the credit balance consists of Direct loans, the University will offer the funds to the student in writing and will not disburse the Direct loan funds directly to the student until the student's authorization is received.

### **Late Disbursement – After 180 Days**

The University will make a late disbursement of federal financial aid funds within 180 days of the date the student became ineligible. No disbursement of funds can be made after the 180-day time frame.

### **Post Withdrawal Disbursement**

Withdrawn students lose federal financial aid eligibility and cannot be paid additional federal financial aid funds for the payment period and/or academic year. However, because of the student's Return to Title IV Funds (R2T4) calculation, the student may be eligible to receive federal financial aid funds that had not been disbursed but could have been disbursed prior to the student's withdrawal date.

If the total amount of federal financial aid grant and/or loan funds earned by the student as calculated on the Return of Title IV Funds (R2T4) calculation is greater than the total amount of federal financial aid disbursed to the student, or parent in the case of a PLUS loan, the student may be eligible to receive a post withdrawal disbursement (PWD).

The University will not include as a PWD any funds from a disbursement that the University was prohibited from making on or before the date the student withdrew, which would apply to the following:

- A first disbursement of a Direct loan to a first-year, first-time borrower who withdraws before completing 30 days of the program of study
- Second or subsequent disbursements of Direct Loan funds unless the student has graduated or successfully completed the loan period
- Disbursements of Federal Pell grant and Iraq and Afghanistan Service Grant (IASG) funds, to a student for whom the University did not receive a valid SAR or a valid ISIR by the deadline established by the Secretary in the Federal Register

A PWD will be made from available grant funds before available Direct loan funds.

### **Post-Withdrawal Disbursement of Federal Financial Aid Grant Funds**

The University may credit a student's account with a PWD of federal financial aid grant funds (Pell, IASG, and FSEOG) without the student's permission for outstanding current (educationally related) charges. The University will obtain a student's authorization to apply PWD grant funds toward anything other than current charges. The University will disburse any amount of a PWD of federal financial aid grant funds as soon as possible, but no later than 45 days after the date of the University's determination that the student withdrew.

If the student does not respond to the University's notice for authorization, federal financial aid grant funds will be used for appropriate outstanding current (educationally related) charges. (See *Authorization to Apply Funds Policy* and *Federal Financial Aid Credit Balance Policy* for the definition of outstanding charges).

### Post withdrawal Disbursement of Federal Financial Aid Loan Funds

The University will notify a student, or parent in the case of a PLUS loan, in writing prior to making any PWD of Direct Loan funds, whether credited to the student account or disbursed directly to the student (or parent in the case of a PLUS loan). The written notification will be sent to the student (or parent or parent in the case of a PLUS loan) as soon as possible, and within 30 calendar days of the University's date of determination that the student withdrew. The written notification will include the following:

- The type and amount of Direct Loan funds to be credited to the student's account or disbursed directly to the student or parent, in the case of a parent PLUS loan
- Explanation that the student, or parent in the case of a PLUS loan, have the right to accept or decline all or a portion of the funds offered.
- Information in reference to the borrower's obligation to repay Direct Loan funds, if disbursed
- A request for authorization to credit Direct Loan funds to the student' account, indicating if confirmation is not provided, the borrower may not receive any Direct Loan funds as a direct disbursement, unless the University concurs
- Information informing the borrowers that no PWD will be made if they do not respond within 30 days of the date of the letter; The University may choose, on an exception basis, to extend this timeline. The deadline for a borrower to accept a PWD will be the same for both a confirmation of a Direct Loan disbursement to the student's account and direct disbursement of a PWD.
- If the University declines to honor a late response accepting loan funds to be credited to the student's account, or parent in the case of a PLUS loan, the University will inform the student or parent in the case of a PLUS loan, of this decision in writing.
- If the University chooses to honor a late response, all loan funds must be disbursed in accordance with the student or parent's request. The result of the contact and the final determination made concerning the disbursement will be documented in the student's file.

Instructions to submit the response in writing directly to Student Financial Services-Operations (SFS-O) by mail, or fax or deliver the response to the campus

If the student or parent in the case of a PLUS loan, responds to the notice within 30 days of the date of the letter and instructs the University to make all or a portion of the PWD, the funds will be disbursed in the manner specified by the student or parent within 180 days of the University's date of the determination that the student withdrew.

If the University chooses to honor a late response, all loan funds accepted by the student, or parent in the case of a parent PLUS loan, will be disbursed in accordance with the student or parent's request. If the University declines to honor a late response accepting loan funds to be credited to the student's account, or parent in the case of a PLUS loan, the University will inform the student or parent in the case of a PLUS loan, of this decision in writing.

The University will not request federal financial aid funds for a PWD unless and until it has determined the following:

- A PWD is due and accepted by the student or parent in the case of a PLUS loan,
- The amount of the PWD, and
- The PWD can be disbursed within three business days of receipt

## Enrollment Reporting Policy

### Overview

The Enrollment Reporting policy details how the University confirms and reports the enrollment status of all Title IV students and previous Title IV students who transfer to the University.

### Policy

The University contracts with the National Student Clearinghouse (NSC) to complete the enrollment reporting requirements. The University confirms and reports the enrollment status of all students to the NSC. The NSC will use the data file provided by the University to complete the Enrollment Reporting file from the National Student Loan Data System (NSLDS). NSC will provide this information to the participating guaranty agencies, lenders, and servicers.

### Using NSC as Enrollment Reporting Servicer

Even though the University uses NSC for enrollment reporting, the University remains responsible for submitting timely, accurate, and complete responses to Enrollment Reporting roster files and for maintaining appropriate documentation. NSLDS will send the roster to NSC; however, if the response is not received in a timely matter, NSLDS will notify the University rather than NSC.

### Normal Reporting Schedule

The University provides the enrollment information to the US Department of Education every 30 days. NSC consolidates all of the data the University sends to them and uses the most recent information to populate the monthly NSLDS enrollment roster.

Any changes in enrollment status to less than half-time, graduated, or withdrawn will be reported within 30 days of becoming aware of the change.

### Reporting Requirements

The University will certify enrollment at the location level using the eight-digit Office of Postsecondary Education Identifier (OPEID). The applicable enrollment status, the effective date of the status, and the anticipated completion date (ACD) of all borrowers attending the University will be reported.

The enrollment status codes must be reported both in the Campus-Level Record, representing the student's overall enrollment at the school and in the Program-Level Record, for each of the academic programs the student attended.

### Enrollment Status categories

Code	Status	ED Guidance for Determining Status and Date	How the University Reports the Status Start Date for Enrollment Statuses
F	Full-time	Date on which the student most recently began uninterrupted enrollment on a full-time bases.	The status start date is not reported on the on weekly SSCR report. It is determined by NSC based on the first day of the term (which is the course start date associated with the first ARA that triggered the full-time status).
L	Less than half-time	Date student dropped below half time or is less than half time is the original status, the date on which the student most recently began uninterrupted enrollment on a less than half-time basis.	The start date of the term date is reported.
A	Leave of Absence	Date the student began an approved leave of absence	The start date of the approved leave of absence
G	Graduated	Date the student completed the course requirements (not presentation date of the diploma or certificate)	The academic complete date for the program (which is the end date of the late course)
W	Withdrawn	Date student officially withdraws or, in the absence of a formal withdrawal, the last recorded date of attendance. In the case of the student who completes a term and does not return for the next term, leaving the course of study uncompleted, the final day of the term in which the student was last enrolled	The student's OLDA at the time the system updates the status
D	Deceased	Date of death, if known; otherwise, the date the school was notified of the death by reliable source	The date of death (when provided) or the date the University received the request in any event the date of death is not provided.

### **Status Start Date**

The University will report the status start date (status effective date) if the student has a Graduated (G), Deceased (D), Withdrawn (W), Less Than Half Time (L), or is on an approved LOA (A) status.

### **Anticipated Graduation Dates**

The anticipated graduation date is the date the student is projected to graduate and will be required only for enrollment data and students with F, L, or A statuses.



## External Transfer Policy

### Overview

The External Transfer policy documents the University's treatment and determination of federal financial aid eligibility for students who transfer to the University from another institution.

### Policy

Students who transfer to the University with or without accepted transfer credits and have an overlapping academic year with a prior institution are referred to as external transfers. An overlapping academic year exists if the student begins a program at the University prior to the expiration of the prior school's academic year. The University contacts the prior school if the academic year length is less than 30 weeks to confirm the dates are correct or request the prior school correct the dates in Common Origination and Disbursement (COD).

The loan period (or payment period, in the case of non-loan federal financial aid) to finish out the overlapping academic year begins on the first day of courses at the University and ends on the inherited academic year-end date of the prior school. If this date falls in the middle of a course at the University, the loan period/payment period and academic year end dates are extended to reflect the end date of the last course on the student's schedule that the student began prior to the inherited academic year end date. If the inherited academic year-end date falls between courses scheduled, the inherited academic year end date and the loan period/payment period end date to finish out the overlap reflects the inherited end date of the prior school.

When awarding federal financial aid for the overlapping academic year, the University determines the number of credits required to complete the overlapping academic year. The student must be enrolled at least half time, i.e. at least six credit hours in the loan period that is finishing out the overlapping academic year in order to be eligible for Direct Loans. (Refer to the Student/Parent Eligibility Policy for additional information)

The student must successfully complete this number of credits in order to progress to the next academic year and loan period. The academic year and loan period are extended, as needed, until the student earns these credits. Therefore, if the student receives a "W" or "F" grade for courses in the overlap, the end dates of the overlapping academic year and loan period are extended, as needed, until the student earns these credits. Similarly, if the student receives an "I" grade or is granted an extension on time to complete coursework, the required number of credits are not successfully earned and the overlapping academic year and loan period must be extended.

### Federal Pell Grant Award

Students who transfer to the University after receiving a Federal Pell Grant at a previous school during the same award year may receive a Federal Pell Grant only if:

1. The student submits a valid SAR to the University; or
2. The University obtains a valid ISIR

A student cannot receive more than his or her scheduled Pell award for a federal award year. (Refer to the Federal Pell Grant-IASG Policy for additional information). When a student has already received a Federal Pell Grant during the same federal award year, the University determines the percentage of the scheduled Federal Pell Grant award that the student has already received in order to calculate the student's remaining eligibility (if any) for a Federal Pell Grant award.

To calculate the student's remaining eligibility, the University uses the following formula:

$$\frac{\text{Pell disbursed at prior school}}{\text{Scheduled Award at prior school}} = \% \text{ of Scheduled Award used}$$

The University then subtracts the percentage of scheduled award used from 100 to calculate the maximum percentage of the scheduled award the student may receive at the University. The University determines the Federal Pell Grant Award the student is eligible for by using the following formula:

$$\text{Maximum \% of Scheduled Award Remaining} \times \text{Scheduled Award at University} = \text{Maximum Pell Award}$$

When calculating the student's Federal Pell Grant award, the University also ensures the student does not exceed the Pell Lifetime Eligibility Used (PELL LEU).

The remaining Federal Pell Grant award amount is not divided equally across the payment periods in the new program. Instead, the Federal Pell Grant funds may be disbursed in an amount up to the student's remaining eligibility for each payment period, except that no payment period disbursement can exceed 50% of the scheduled annual award.

Pell Example: A student received a portion of a Federal Pell Grant at a community college, and then transferred to the University during the same federal award year. The community college performed a Return to Title IV (R2T4) calculation and returned a portion of the student's Federal Pell Grant award.

<b>Pell Data from the Community College</b>	
Scheduled Pell award	\$3,000
Pell award disbursed	\$1,500
Amount of Pell funds returned due to R2T4 calculations	\$ 300
Net amount of Pell funds disbursed to student	\$1,200

The University's cost of attendance is higher than the community college, which increases the student's scheduled Federal Pell Grant to \$4,000 for the federal award year. The University must now determine the student's remaining Federal Pell Grant eligibility for the federal award year to determine the amount it may actually award to the student.

<b>Pell Calculations to Determine Remaining Pell Eligibility</b>	
<b>Scheduled Pell Award at the University</b>	\$4,000
<b>Percentage of Pell award already used</b> (Net Pell disbursed / Scheduled Pell award at prior school)	$\$1,200 / \$3,000 = 40\%$
<b>Percentage of remaining Pell eligibility</b> (100% - Percentage used)	100% - 40% = 60%
<b>Student's remaining Federal Pell Grant Award</b> (Scheduled award at University x Percentage remaining eligibility)	$\$4,000 \times 60\% = \$2,400$

The student's remaining Federal Pell Grant eligibility is \$2,400. Since this amount is more than half of the scheduled Federal Pell Grant award, the award must be disbursed in two payment periods. As long as the student's first payment period in the new program is at least half of an academic year (in both credits and weeks), the student may receive half of the scheduled award in the first payment period. If the second payment period in the new program falls in the same federal award year, the student will receive the remainder of the Federal Pell Grant amount in the second payment period.

<b>Pell disbursements at the University</b>	
First payment period	\$2,000
Second payment period	\$ 400

### Federal Direct Loan Award

The loan at the University may not exceed the remaining balance of the student's annual loan limits after the disbursements at the previous school are considered. If the balance of the program is less than an academic year, those Direct Loans originated for a single payment period are disbursed in two disbursements (Refer to the *Disbursements Policy* for additional information).

*Direct Loan Example:* A student received a portion of a Direct Loan at a community college, and then transferred to the University during the same academic year, creating an overlapping academic year at the University. When the student transferred, the community college performed a Return to Title IV (R2T4) calculation and returned a portion of the student's Direct Loan funds. The student is enrolled at the University as a first year, independent undergraduate student with maximum annual Subsidized Loan eligibility of \$3,500 and Unsubsidized Loan eligibility of \$6,000.

<b>Direct Loan Date from the Community College</b>	
Subsidized Loan originally disbursed	\$1,750
Subsidized Loan funds returned due to R2T4 calculation	\$ 0
<b>Net Subsidized Loan Funds Disbursed</b>	\$1,750
Unsubsidized Loan disbursed	\$3,000
Unsubsidized Loan funds returned due to R2T4 calculation	\$1,000
<b>Net Unsubsidized Loan funds disbursed</b>	\$2,000

The University must now determine the student's remaining Subsidized and Unsubsidized Loan eligibility for the overlapping academic year.

<b>Direct Loan Calculation to Determine Remaining Eligibility for Overlapping AY</b>	
<b>Remaining Subsidized Loan Eligibility</b> (Annual Subsidized Loan Limit - Net Subsidized Loan funds disbursed)	\$3,500 - \$1,750 = \$1,750
<b>Remaining Unsubsidized Loan Eligibility</b> (Annual Unsubsidized Loan Limit - Net Unsubsidized Loan Funds disbursed)	\$6,000 - \$2,000 = \$4,000

These remaining loan fund amounts will be disbursed based on the payment periods in the loan period at the University. (Refer to the *Disbursements Policy* for additional information).

### Other Federal Aid Awards

All other federal financial aid, including Federal Supplemental Opportunity Grant (FSEOG) will follow same awarding process of finishing out the overlapping academic year.

## Federal FA Credit Balance Policy

### Overview

The Federal Financial Aid Credit Balance Policy addresses federal financial aid credit balances and how the University handles those credit balances when they occur on a student's account. Whenever the University credits federal financial aid funds to a student's account and those funds exceed the student's allowable charges, a federal financial aid credit balance occurs. The University will pay the excess federal financial aid funds directly to the student or parent as soon as possible, but no later than 14 days after the balance occurred on the student's account unless an Authorization to Hold Funds form is on file.

### Policy

Whenever the University credits federal financial aid funds to a student's account and those funds exceed the student's allowable charges, a federal financial aid credit balance occurs. The order in which funds are credited does not matter, and the University does not require a student or parent to take any actions to obtain the credit balance.

### Attribution of Funds

The University considers to have disbursed federal financial aid grants before direct loans to a student's account in the following order regardless of when the funds are credited:

1. Pell Grant
2. Iraq and Afghanistan Service Grant (IASG)
3. FSEOG
4. Direct Subsidized Loan
5. Direct Unsubsidized Loan
6. Graduate/Professional PLUS Loan
7. Parent PLUS Loan

*Note* – Federal regulations require direct loan funds applied to a student's account must first be used to pay for current charges.

### Authorization to Hold Funds

The University may obtain a student's (or parent in the case of a PLUS loan) written, voluntary authorization through the University's financial aid application process, to hold a federal financial aid credit balance. Each award year, a new authorization form is requested.

The University does not require or coerce the authorization and notifies the student (or parent in the case of a PLUS loan) the authorization may be canceled at any time. If the student (or parent in the case of a PLUS loan) chooses to cancel the authorization, the cancellation is not retroactive. Funds held for incurred allowable charges and prior year charges prior to the University receiving the authorization cancellation, will remain on account.

At any time, the University will accept a signed statement from a student (or parent in the case of a PLUS loan), canceling or modifying the authorization initially provided. The Financial Aid Authorization form is available to students on the University's web site (MyWest).

The University will accept an authorization provided by the student (or parent in the case of a PLUS loan) orally, rather than in writing if the student (or parent in the case of a PLUS loan) is affected by a federally declared natural disaster and is prevented from providing a written authorization based on status.

If a student (or parent in the case of a PLUS loan) cancels an authorization to apply a federal financial aid credit balance, the funds are paid directly to the student (or parent in the case of a PLUS loan, or student if authorized by the parent). This occurs as soon as possible, but no later than 14 days after the University receives the notice.

Notwithstanding any authorization, the University pays any remaining balance on loan funds to the student (or parent in the case of a PLUS loan, or student if authorized by the parent) by the end of the loan period.

### Application of Funds

The University applies funds received from a federal financial aid disbursement in the following order:

1. Invoiced and unpaid allowable charges for the current payment period, or prior payment period of the loan period;
2. If authorization has been obtained from the student (or parent, in the case of a PLUS loan), future allowable charges in the payment period of the applicable loan period; and
3. Loan funds to any unpaid allowable charges for a prior loan period (not to exceed \$200);

*Note:* There may be instances where a disbursement of Direct Loan funds is received and there are no current invoiced or future allowable charges on the student's account. In these instances, the University first applies the Direct Loan funds to any unpaid allowable charges for a prior loan period, not to exceed \$200.

If both the first and second disbursements are received simultaneously, allowable charges may be withheld for both payment periods provided those charges have been charged to the student account.

### Timeline to Issue a Federal Financial Aid Credit Balance

If there is no authorization on file, the University issues excess funds to the student within 14 days of the date funds are disbursed (applied to the student's account, or in the case of a check, the date that the check is signed by the student or parent).

### Treatment of Unclaimed Federal FA Credit Balance

If the University is unable to locate a student to pay a credit balance and has exhausted all possible avenues to find the student, the University returns the credit balance to the applicable federal financial aid programs. This process is accomplished by referencing the attribution of funds section in this policy.

The University returns any unclaimed federal financial aid credit balance issued by check to the applicable federal financial aid programs no later than 240 days after the check issued date. If the funds were issued via electronic funds transfer (EFT) and subsequently rejected, the University returns the funds to the applicable federal financial aid programs no later than 45 days after the funds were returned or rejected.

### Return of Federal Financial Aid

The University holds a federal financial aid credit balance until completion of the Return of Title IV (R2T4) process. (Refer to the *Return of Title IV Calculation Policy* for additional information). Once the R2T4 calculation is completed, if there is any federal financial aid credit balance remaining, the University allocates the credit balance as follows:

- First, to repay any grant overpayment owed by the student as a result of his/her withdrawal
- Within 14 days of the date the R2T4 calculation is performed, the University pays any remaining federal financial aid credit balance in one or more of the following ways:
  - Pay authorized charges at the University; or
  - Pay the student directly (or parent for a Direct PLUS loan)

(Refer to the *Return of Title IV Policy* for additional information).

## Federal Pell Grant and IASG Policy

### Overview

The Federal Pell Grant/Iraq and Afghanistan Service Grant (IASG) Policy illustrates how the University calculates and awards Pell Grants and IASG to eligible students.

### Policy

The University calculates the annual award for students in non-term credit-hour programs using the Federal Pell Grant Formula 4 in conjunction with the full-time payment schedule. The maximum duration of Pell and IASG eligibility is limited to six full-time scheduled awards, as measured by the percentage of "lifetime eligibility used" (LEU). Students are ineligible to receive further Pell and or IASG funds if they have 600% or greater.

### Rounding

The University uses standard rounding rules, applied consistently to all students, and will round Pell and IASG disbursements to the nearest dollar (not to exceed the scheduled Pell/IASG award). See exception under "Pell Payment Calculations and LEU Limitations" section below.

### Calculating Payment Amounts

The award for each payment period may be subject to proration. The scheduled Pell/IASG award is prorated based on the percentage of the following:

- Credit hours in the payment period over the credit hours in an academic year

Or

- Weeks of instructional time in the payment period over the weeks in the academic year

The scheduled Pell/IASG award is calculated using the lesser percentage multiplied by the scheduled award.

### Crossover Payment Periods

When a payment period falls into two award years – it begins before July 1 and ends on or after July 1 – it is referred to as a "crossover payment period." If a student is enrolled in a crossover payment period, the entire payment period must be considered to occur within one FAFSA award year. The University determines for each Pell/IASG grant recipient the award year in which the payment period is placed.

Students are awarded from the oldest and active award year first.

### Pell Payment Calculations and Lifetime Eligibility Used (LEU) Limitations

If a student has less than 100% remaining of the maximum 600% Pell LEU, the University will disburse 50% of the Pell award in the first Pell payment period. The remaining percentage of the Pell award is disbursed in the second Pell payment period. Rounding rules do not apply to these disbursements.

### Pell Payment Calculations and Lifetime Eligibility Used (LEU) Limitations for End of Program (EOP)

For any remaining portion of a program that is more than one-half of an academic year (AY) but less than a full AY, the remaining portion is divided into two payment periods. The first payment period is the period in which the student successfully completes half of the credits AND half of the weeks of instructional time in the remaining portion. A student may receive less than a Scheduled Award in an award year, if the program crosses award years and the student's Pell Grant award in one of the award years is for a portion of the program that is less than a full AY.

- The annual award for a student in a non-term credit-hour program is taken from the full-time payment schedule even if the student is attending less than full-time.

- Comparable proration will be performed based on the number of credits in the payment period as they compare to the credits in the defined AY OR the number of weeks in the payment period as they compare to the weeks of instructional time in the AY.
- The scheduled Pell award will be multiplied by the lesser of the 2 calculations to determine the Pell payment.
- If a student has more than 500% Pell LEU, the Pell payment will be the lesser amount between the proration calculation and the remaining eligibility award using the Pell LEU calculator.

### Students Declining Pell Grant Funds

Students who decide to decline all or a part of a Pell grant disbursement must deliver to the University a signed, written statement clearly indicating they are declining the Pell grant funds for which they are eligible. Furthermore, they must understand those funds may not be available once the FAFSA award year is over. If the University receives a statement indicating such from the student, it will submit any adjustment records for the student to the Common Origination and Disbursement (COD) System. Any University account balance(s) resulting from the return of Pell Grant funding will be the responsibility of the student.

### Students Returning Pell Grant Funds

Students have the option of returning all or a portion of Pell grant funds they were eligible to receive, as long as this return is taken during the SAME award year. If they choose to do so, they must deliver to the University a signed statement clearly indicating they are returning the Pell grant funds they are eligible for.

Furthermore, they understand those funds may not be available once the award year is over. Students must return the funds directly to the University, and the University will return those funds to the Pell grant account. After doing so, the University must submit the required adjustment records for the students to the COD System. Any University account balance(s) resulting from the return of Pell/IASG Grant funds is the responsibility of the student.

The University does not accept any Pell/IASG grant funds from prior FAFSA award years.

### Disputing the Accuracy of Pell Grant LEU Information

If a student attending the University chooses to dispute the accuracy of the Pell LEU information found in the Common Origination and Disbursement (COD) System, the University will assist the student in resolving this dispute. The University will not escalate the matter should it discover the amount of the Pell Grant LEU percentage being disputed would not, if corrected, make the student eligible for additional Pell Grant funding.

However, if there is a valid dispute, acceptable documentation to resolve the dispute must be collected. This documentation could include, for example, a written statement from the previous institution confirming the student never attended, or at least never received Pell Grant funds from that institution for the award year in question. The University will then contact Federal Student Aid's COD School Relations Center at 800-474-7268. The Department of Education, after its review of the student's assertion and any supporting information submitted, will provide the University with a response and instructions on how to proceed.

On occasion, a student may dispute the Pell LEU information by contacting ED. In these scenarios, the University will require the exception/override to the dispute directly from ED in writing. Once the information is received, the University will adjust the student's Pell eligibility accordingly. The student must meet all other eligibility criteria in order to receive the Pell Grant funds.

### Recalculation

If an expected family contribution (EFC) changes due to corrections, updating, or an adjustment and the EFC change would change the Pell/IASG grant award, the University will recalculate the Pell/IASG award for the entire award year. If, as a result of the recalculation, the student received more Pell/IASG award amount, an overpayment exists. Refer to the *Over-awards and Overpayments Policy* for further information on how to resolve the overpayment.

### Retroactive Payments

For all prior payment periods for which a student was an eligible student within the award year, the University will pay the total lump sum of retroactive payments in two separate installments one day apart from each other.

**Regaining Eligibility**

If a student resolves ineligibility criteria while attending the University (e.g. resolves a default or over-borrowing), the effective date of regaining eligibility for the Federal Pell Grant and IASG programs begins with the payment period in which the issue is resolved.



## Financial Aid Counseling Policy

### Overview

The Financial Aid Counseling Policy addresses the requirements of the University ensuring initial entrance counseling is completed and borrowers are notified of the requirement to complete exit counseling for each Direct and Graduate/Professional PLUS loan.

### Policy

#### Entrance Loan Counseling

Entrance loan counseling, for Direct, graduate/professional PLUS Loan borrowers, provides comprehensive information on the terms and conditions of the loan and the responsibilities of the borrower with respect to the loan.

The University ensures entrance loan counseling is completed on the U.S. Department of Education website for each borrower. The counseling session includes completion of an interactive program that tests the borrower's understanding of the terms and conditions of the loans.

The University ensures that an individual with expertise in federal financial aid is reasonably available to answer the borrower's questions regarding those programs.

Online counseling for Direct and Graduate/Professional PLUS borrowers generally provides the following:

- An explanation of the use of a Master Promissory Note (MPN)
- Importance of repayment obligation
- Description of consequences of default
- Sample repayment schedules
- Information in reference to a borrower's rights and responsibilities
- Information on the National Student Loan Data System (NSLDS)
- Information on possible loss of eligibility for additional Direct Subsidized loans
- Information on how a borrower's maximum eligibility period, remaining eligibility period, and subsidized usage period are determined
- The potential for a borrower becoming responsible for all accruing interest on Direct
- Subsidized loans during in-school periods, grace periods (for loans first disbursed on July 01, 2012 through June 30, 2014), and periods of authorized deferment
- Impact of borrower responsibility for accruing interest on the borrower's total debt
- Other terms and conditions

Entrance loan counseling for Graduate PLUS borrowers will also include information about options to pay interest on a PLUS Loan while the borrower is in school.

The University maintains documentation substantiating the completion of entrance loan counseling for each student borrower.

Effective March 29, 2015, PLUS Loan counseling must be completed by the applicant (parent or graduate/professional student) with an adverse credit history who qualifies for a Direct PLUS Loan by obtaining an endorser who does not have an adverse credit history, or who documents to the satisfaction of the Department of Education that there are extenuating circumstances related to the adverse credit information.

### Exit Loan Counseling

Federal financial aid recipient students attending the last class of a program at the University will receive an electronic notification of the requirement to complete exit loan counseling. The notification provides a link for the student to complete the exit loan counseling online at the U.S. Department of Education National Student Loan Database (NSLDS) website. In addition, within 30 days of a student's last date of attendance, the University sends a letter with the required exit counseling materials. If the student completed the online exit loan counseling, no response to the letter will be required.

If the student is an unofficial withdrawal, the University mails exit loan counseling material to the borrower at the last known address. The material will be mailed within 30 days of the University learning the borrower has withdrawn. The University documents the student's file with the date the materials were sent.

## HEROES Act Policy

### Overview

The HEROES Policy addresses the Higher Education Relief Opportunities for Students (HEROES) Act of 2003. This policy ensures service-members who are receiving federal financial aid are not adversely affected because of their military status and minimizes the administrative burden placed on such individuals.

### Policy

The University ensures those affected by war, military operations or national emergencies are not disadvantaged because of their status.

### Category 1 Individuals

Individuals affected by the waivers and modifications under this category include persons who

- are serving on active duty during a war or other military operation, or national emergency;
- are performing qualifying National Guard duty during a war or other military operation, or national emergency;
- reside or are employed in an area that is declared a disaster area by any federal, state, or local official in connection with a national emergency; or
- suffered direct economic hardship as a direct result of a war or other military operation, or national emergency

The following waivers and modifications affect Category 1 individuals:

### Need Analysis

The University substitutes adjusted gross income plus untaxed income and benefits received in the first calendar year of the award year for which such determination is made for any affected individual, and for his or her spouse and dependents, if applicable, in order to reflect more accurately the financial condition of an affected individual and his/her family. The University has the option of using the applicant's original EFC or the EFC based on the data from the first calendar year of the award year. If the University chooses to use the alternate EFC, it uses the administrative professional judgment procedures established by the Secretary as discussed in the following section.

### Professional Judgment

To more accurately reflect financial need; the University uses professional judgment on a case-by- case basis for affected individuals. The University determines the need for an affected individual by determining the most beneficial of the following:

- The individual's need as determined using the adjusted gross income plus untaxed income and benefits received in the first calendar year of the award year
- The individual's need as determined using professional judgment
- The individual's need as determined making no modifications (i.e. an individual's income increased as a result of serving on active duty)

The University clearly documents the reasons for any adjustment and the facts supporting the decision. In almost all cases, the University will have documentation from a third party with knowledge of the student's unusual circumstances. As usual, any professional judgment decisions made that affect a student's eligibility for a subsidized student financial assistance program will be reported to the Central Processing System.

### Title IV Grant Overpayments

A student who withdraws from the University because of status as an affected individual is not required to return or repay any overpayment of grant funds based on the Return of Title IV (R2T4) calculations.

The University does not deny federal financial aid eligibility to an affected individual who owes an overpayment. In addition, the University does not contact the student, notify NSLDS, or refer the overpayment to Debt Collection Services. However, the affected individual's file will be documented to include the amount of the overpayment.

The University does not apply any federal financial aid credit balance toward an overpayment before using the credit balance to pay authorized charges; pay the credit balance to the student (or parent, in the case of a PLUS loan); or use the credit balance to reduce the student's federal financial aid loan debt (with the student's authorization).

### Verification of AGI and U.S. Income Tax Paid

An affected individual whose income was used to determine the EFC, and who has not filed a tax return because an extension was granted, is not required to submit a copy of the IRS Form 4868 or IRS approval of an even longer extension if the applicant is selected for verification.

For these individuals, the University accepts the following:

1. A signed statement certifying the student has not filed an income tax return or a request for a filing extension because of active duty or for qualifying National Guard duty during a war or other military operation or national emergency; AND
2. A copy of each W-2 received for the specified year or, for a self-employed individual, a statement signed by the individual certifying the amount of the AGI for the specified year

The University may request that an individual granted a filing extension submit tax information using the IRS Data Retrieval Tool, or by obtaining a tax return transcript from the IRS that lists tax account information for the specified year after the income tax return is filed. If the University receives the tax information, it will verify the income information of the tax filer(s).

### Category 2 Individuals

Individuals affected by the waivers and modifications under this category include persons who

- are serving on active duty;
- are performing qualifying National Guard duty during a war or other military operation, or national emergency; or
- reside or are employed in an area that is declared a disaster area by any federal, state, or local official in connection with a national emergency.

The following waivers and modifications affect Category 2 individuals:

#### Post-withdrawal Disbursement (PWD)

A student who withdraws because of status as an affected individual and who is eligible for a post-withdrawal disbursement has up to 45 days to respond to a PWD offer. However, at the University's discretion, it may honor the PWD if the student (or parent in case of a parent PLUS loan) responds to the offer after 45 days.

#### Leaves of Absence (LOA)

The University documents the decision for granting an approved LOA to an affected individual if that individual has difficulty providing a written LOA request because of affected status. The documentation includes both the reason for the LOA and the reason for waiving the requirement that the LOA be requested in writing.

#### Treatment of Federal Financial Aid Credit Balance When a Student Withdraws

The University must pay any federal financial aid credit balance to the student, or parent in the case of a parent PLUS loan, within 14 days after the balance occurred. The University will be considered to have met this 14-day requirement if, within that timeframe, the University attempts to contact the student (or parent) to suggest that the University be authorized to return the credit balance to the loan program(s).

If the University chooses to attempt to contact the student (or parent) for authorization to apply the credit balance to reduce the student's federal financial aid loan debt, the University will allow the student (or parent) 45 days to respond. If there is no response within 45 days, the University will promptly pay the credit balance to the student (or parent) or return the funds to the federal financial aid programs if the student (or parent) cannot be located. The University may also choose to pay the credit balance to the student (or parent) without first requesting permission to apply the credit balance to reduce the student's federal financial aid loan debt.

### **Loan Cancellation**

The University allows an affected individual at least 60 days after the date the University's notice to the borrower of the right to cancel all or a portion of the loan is sent for the borrower to request the cancellation. The cancellation may be for all or a portion of a loan for which proceeds have been credited to the account at the University. If the University receives a loan cancellation after the 60-day period, the University may comply with the reasonable request.

### **Student and Parent Authorizations**

The University accepts an affected individual's verbal consent or authorization to do the following:

- Disburse federal financial aid funds to a bank account
- Use federal financial aid funds to pay for charges other than tuition, fees
- Hold federal financial aid funds on behalf of the student or parent that would otherwise be directly paid to the student or parent

The University will document the verbal consent or authorization.

### **Satisfactory Academic Progress**

If a student fails to meet the University's satisfactory academic progress (SAP) standards (Refer to the SAP Policy for further information) as a direct result of being an affected individual in this category, the student may request a SAP appeal. The University will approve the appeal based on documentation of military orders.

### **Category 3 Individuals**

Individuals affected by the waivers and modifications under this category include persons who

- are serving on active duty, or
- are performing qualifying National Guard duty during a war or other military operation or national emergency

The following waivers and modifications affect Category 3 individuals:

### **Institutional Charges and Refunds**

If a student was called up for active duty or for qualifying National Guard duty during a war or other military operation or national emergency, the HEROES Act encourages the University to do the following:

1. Provide a full refund of tuition, fees, and other institutional charges for the portion of a period of instruction that a student was unable to complete, or did not receive academic credit,
2. Provide a credit in a comparable amount against future charges.
3. Consider providing easy and flexible re-enrollment options to students who are affected individuals in this category.

At a minimum, the University must comply with the readmission requirements for service members under certain conditions. The University may provide such treatment to affected individuals other than those who are called for active duty or for qualifying National Guard duty during a war or other military operation or national emergency. Before the University makes a refund of institutional charges, it will perform the required Return of Title IV (R2T4) Calculations based upon the originally assessed institutional charges. After determining the amount the University must return to the federal financial aid programs, any reduction of institutional charges may take into account the funds the University is required to return. The U.S. Department of Education does not expect that an institution would both return funds to the federal financial aid programs and provide a refund of those same funds to the student.

### Category 4 Individuals

Individuals affected by the waivers and modifications under this category include the spouse or dependents of persons who are

- serving on active duty or
- performing qualifying National Guard duty during a war, other military operation, or national emergency

The following waivers and modifications affect Category 4 individuals:

### Verification Signature Requirements

- A dependent student is not required to submit a statement signed by one of the applicant's parents when no responsible parent can provide the required signature because of the parent's status as an affected individual in this category.
- Signatures on the Free Application for Federal Student Aid (FAFSA), Student Aid Report (SAR), and Institutional Student Information Record (ISIR)
- A dependent student is not required to provide a parent's signature on the FAFSA, SAR, and/or ISIR when there is no responsible parent to provide a signature because of the parent's status as an affected individual in this category. The high school counselor or financial aid administrator may sign on behalf of the parent as long as the applicant provides adequate documentation concerning the parent's inability to provide a signature due to the parent's status as an affected individual in this category.

## Leave of Absence Policy

### Overview

The Leave of Absence (LOA) Policy addresses the temporary interruption in a student's program of study, when the student is not in attendance at the University. The LOA Policy is applicable to all students enrolled in certificate and degree programs at the University. If a student is not actively enrolled in a program, the student is not eligible to apply for an LOA. During an approved LOA, the student is not considered withdrawn and no Return to Title IV (R2T4) calculation is required for federal financial aid recipients.

### Policy

Students may be approved by the University for multiple LOAs in a 12-month period. The total of all approved LOAs may not exceed 180 days in the 12-month period. During an approved LOA, the student is not considered withdrawn and no Return of Title IV (R2T4) calculation is required for financial aid recipients.

### Required Documentation

An LOA may be approved only if the University determines there is a reasonable expectation the student will return. Students must follow the University's LOA policy when requesting the LOA, by providing (on or before the start date of the LOA) a completed University LOA request form or a written, signed and dated request, including the reason for the LOA to Student Financial Services – Operations (SFS-O).

If unforeseen circumstances prevent a student from providing a request for the LOA to the campus on or before the start of the LOA, the University may grant the LOA if the campus has documented the reason and decision. The University must collect the signed LOA request form from the student later and provide it to SFS-O within a reasonable amount of time from the last date of attendance. Unforeseen circumstances may include, but are not limited to, medical and family emergencies, military, jury duty, business travel, University course cancellation and/or facility closure, and natural disasters.

If a student is out of attendance due to an unforeseen circumstance and considered an unofficial withdrawal and the University can document the reason and decision for the LOA prior to the Return of Title IV (R2T4) calculation being performed, the student will be placed on an approved LOA and no calculation will be required.

An LOA will not be approved if a student requests an LOA after 14 consecutive days of nonattendance, has a current enrollment status of unofficial withdrawal (UNW) and the request is not due to unforeseen circumstances that occurred prior to the UNW status.

If a student requests an LOA start date in the future and is officially withdrawn, unofficially withdrawn, or administratively withdrawn from the University prior to the start date of the LOA, the LOA is not valid and will be canceled.

### Length

In determining the length of the LOA, the LOA start date is the first day of the LOA and the LOA end date is the day before the start date of the course the student is returning to at the University. The first day of the student's initial LOA is used when determining the start date for the 12-month period. If a student is granted an LOA due to unforeseen circumstances, the beginning date of the approved LOA, as recorded by the student on the LOA form, is the date the student was unable to attend class because of unforeseen circumstance.

The course start date will cease the LOA day count; however, the University's academic system of record will use an active enrollment status effective date as determined by the date the student posts an academic related activity (ARA) in the course the student returns to at the University. NSLDS Enrollment Reporting will use the standard effective date for an active enrollment (i.e. course start date). A new LOA request form will be required for any additional LOAs.

*Note: At the time of the LOA approval, the University will review the LOA dates requested by the student and may adjust those dates based on ARAs, class schedules, etc.*

## Extending an LOA

A student may request an LOA extension as long as the request is made before the scheduled return date. Students must follow this policy when requesting the LOA extension, by providing on or before the scheduled end date, a written, signed, and dated request, including the reason for the LOA extension to Student Financial Services – Operations (SFS-O).

## Institutionally Scheduled Breaks

If a student submits an LOA request with a start date being the same day as the start of an institutionally scheduled break or a start date that falls within an institutionally scheduled break, the University will update the LOA start date to the first day after the institutionally scheduled break ends.

If a student's LOA is scheduled to end on or within an institutionally scheduled break, the University will update the LOA return date to the start date of the course that is scheduled to begin after the institutionally scheduled break, as long as the student is registered for a course set to begin when the institutionally scheduled break ends.

If a student's LOA request completely overlaps an institutionally scheduled break, all days of the institutionally scheduled break and the LOA days will count toward the length of the LOA and apply toward the maximum of 180 days in a 12-month period. The University will not allow a student to take two consecutive LOAs separated by an institutionally scheduled break.

## Disbursements during an LOA

The University may disburse Pell, IASG, and FSEOG funds to a student on an LOA during certain times of the year. Federal financial aid funds that are part of a credit balance created before the student began an LOA may be paid to the student, since those funds were disbursed before the student went on the LOA.

## Completion of Coursework upon Return

If a student starts an approved LOA in the middle of a course, the University must ensure no additional charges for this course are incurred when the student returns from the LOA. To ensure no additional charges for this course are incurred, the University will issue the student a LOA Credit (LOAC). This LOAC will be applied to the course scheduled after the LOA end date.

## Failure to Return

The University will advise the student, prior to granting the LOA, that failure to return from an LOA may affect the loan repayment terms, including the expiration of the student's grace period. If a student does not return from an approved LOA, the withdrawal date and beginning of the grace period will be the student's last date of attendance.

If the student reenters, after withdrawing from the University, the previously approved LOA days will count toward the student's LOA maximum of 180 days in a 12-month period.



## Over-awards and Overpayment Policy

### Overview

Institutions are required to resolve over-awards and overpayments that occur in a student's financial aid package.

### Policy

An over-award occurs when a student's financial aid package exceeds financial need or when the total of a student's awards exceeds the cost of attendance (COA). Over-awards are usually the result of a student receiving financial assistance the University was not aware of when the student was packaged and/or awarded. The over-award becomes an overpayment if the University cannot correct the issue before funds are disbursed to the student.

### Pell Grants

The Federal Pell Grant is never adjusted to take into account other forms of financial assistance.

Therefore, if a student's financial aid package exceeds need, the University will first attempt to eliminate the over-award by reducing other financial aid awarded. If the University awards a Pell Grant to an ineligible student, that award becomes an over-award and must be resolved.

If the University makes a Pell Grant overpayment for which it is not liable and the student is still enrolled, the University will submit an Overpayment template and return the funds on behalf of the student. The student is repackaged according to eligibility and owes the University, rather than the Department of Education, any Pell grant funds he/she was ineligible to receive. If the student withdraws from the University and the Return to Title IV calculation results in a Pell Grant overpayment, the University immediately sends a written notice to the student requesting repayment of the overpayment amount. The notice includes a statement that failure to make the repayment, or make satisfactory repayment arrangements with the holder of the overpayment will make the student ineligible for further federal financial aid until the overpayment is resolved. Students are not liable for, and the University is not required to attempt recovery of or refer to the Secretary, a Pell Grant overpayment that is less than \$50 and is not a remaining balance.

If the student fails to repay the Pell Grant overpayment or make satisfactory repayment arrangements, after the University has contacted the student, it must refer the overpayment to the Secretary for collection purposes.

### Iraq and Afghanistan Service Grants (IASG)

The IASG, like the Federal Pell Grant, is never adjusted to take into account other forms of financial assistance. If a student's financial aid package includes an IASG and the package exceeds need or COA, but the IASG by itself does not exceed the student's need, the University must reduce other financial aid to eliminate the over-award. However, if the IASG payment by itself will exceed a student's COA for a period of enrollment, the total amount of the IASG must be reduced to the federal financial aid (Title IV) COA for the period of enrollment.

If a student receiving an IASG becomes Pell eligible during the award year, the University must treat the Pell Grant as EFA and may need to adjust the student's aid package.

### Campus Based Funds

The University only disburses Federal Supplemental Education Opportunity Grant (FSEOG) to students who's FSEOG, combined with other estimated financial assistance (EFA) does not exceed the student's financial need.

### Estimated Financial Aid Assistance Exceeds Need

Campus-based funding allows for a \$300 over-award tolerance if a student has received additional EFA not included in the calculation of the FSEOG. The \$300 threshold is allowed only if an over-award occurs after Campus-Based aid has been awarded and/or disbursed and the University was unaware the student would receive additional financial assistance.

*NOTE: Direct loans do not provide for any type of tolerance in need.*

Therefore, if a student received additional amounts of EFA not included in the calculation of the FSEOG and Pell Grant and the amount results in the total EFA exceeding financial need by more than \$300, the University may take, at its discretion, the following steps:

1. If the student demonstrates increased financial need but the total amount of EFA does not exceed this increased need by more than \$300, no further action will be necessary.
2. If the total amount of EFA still exceeds need by more than \$300, cancel any undisbursed loan or grant funds except for Pell Grant funds.
3. If the total amount of EFA still exceeds need by more than \$300, treat it as an overpayment that must be eliminated.

### Direct Loans

If the University discovers, before disbursing Direct Subsidized Loan, Direct Unsubsidized Loan, or Direct PLUS Loan funds, that a student will receive or has received federal financial aid for the period the loan was intended and it exceeds the amount of financial aid the student is eligible for, the University will reduce or eliminate the over-award by either –

1. Using the student's Direct Unsubsidized Loan, Direct PLUS Loan, state-sponsored or another non-federal loan to cover the EFC, if not already done; or
2. Reducing or returning one or more disbursements to eliminate the over-award.

### State Grants and Pell Funds Only

In the event there is an over-award, if a student is awarded state grant funds and Pell Grant funds only, state grant funds will be reduced to eliminate this over-award.

### Financial Aid Assistance Exceeds Cost of Attendance

The University first attempts to eliminate an over-award by replacing the EFC with non-need-based loans provided the student has not been awarded up to the COA. (Loan amounts that exceed the expected family contribution (EFC) must be counted as estimated financial assistance (EFA)). The University may also attempt to eliminate an over-award by using actual COA charges for the academic year. If the over-award is not resolved, the University reduces or cancels any future federal financial aid loans or private loans first. If a return of funds is necessary to eliminate the over-award, funds are returned in the following order:

1. Private Loan
2. Direct Graduate/Professional PLUS Loan
3. Direct Parent PLUS Loan
4. Direct Unsubsidized Loan
5. Direct Subsidized Loan

If the student becomes ineligible for only part of a Direct Loan or PLUS loan, the University will reduce the loan to eliminate the amount the student is ineligible for. If the over-award situation occurs after Direct Loan funds have been fully disbursed, there is no Direct Loan over-award that needs to be addressed.

If the student has no loans or if the student's financial assistance still exceeds financial need or COA, the University will proceed to reduce institutional grant and/or scholarship aid.

*Reminder - The University will adjust the financial aid package to prevent an over-award of campus-based funds.*

### Conflicting Information and Other Assistance

The University is responsible for resolving conflicting information in a student's file. At times, the University may receive aid it was unaware of for a student. If the financial assistance was received after the end of the period of enrollment for a student who is still enrolled or who is intending to re-enroll, the University treats the financial assistance as EFA for the period of enrollment just completed.

## Packaging Philosophy Policy

### Overview

The Packaging Philosophy Policy addresses the University's calculation of student awards based on costs, period of enrollment, and statutory award limits.

### Policy

Prior to determining student eligibility for federal financial aid, the University will confirm a valid output document - Institution Student Information Record (ISIR) - is on file.

The University uses the "Ladder" packaging methodology (from USA Funds University - Awarding Financial Aid, January 30, 2013), which allows all applicants to be treated in the same manner when awarding funds. The University will package up to the cost of attendance (COA) by replacing the expected family contribution (EFC) with non-need based aid unless specified by the student, or the parent in the case of a parent PLUS loan. (Loan amounts that exceed the EFC must be counted as estimated financial assistance).

### Determining Need

The University will subtract the EFC, the Federal Pell Grant and other non-Title IV federal financial aid other resources from the cost of attendance (COA) to determine remaining need.

Example:

\$12,500	Cost of Attendance
- 2,500	EFC
- 1,600	Pell Grant
- <u>1,400</u>	Scholarship
\$ 7,000	Remaining Need

The order in which financial aid is considered and awarded is as follows:

#### Federal Pell Grant/Iraq and Afghanistan Service Grant

The Federal Pell Grant, or alternatively, Iraq and Afghanistan Service Grant (IASG) will be considered the first source of financial assistance to a student.

#### Zero EFC Treatment for Children of Soldiers

An otherwise-Pell eligible student whose parent or guardian died due to U.S. military service in Iraq or Afghanistan after September 11, 2001, may receive increased amounts of federal financial aid if-

- (1) The student was less than 24 years of age when the parent or guardian died; or
- (2) Enrolled at an institution of higher education at the time of the parent or guardian's death

The University will use an EFC of zero (0) to package all federal financial aid if the student meeting the previously stated criteria has a Pell-eligible EFC. The zero EFC will only be used for packaging purposes. The U.S. Department of Education (ED) will notify the University when a student appears to meet the criteria for zero EFC treatment. This will be based on a match with the U.S. Department of Defense file of eligible dependents.

#### Other Resources

Other resources include, but are not limited to, the following:

- External grants and scholarships
- University grants and scholarships
- Tuition assistance

- Military tuition benefits
- University tuition discounts and waivers
- University administration tuition and/or student account adjustments
- Income from insurance programs that pay for the student's education
- Private loans
- Private and State grants
- Tribal aid
- Other financial assistance paid directly to the University

### **Grants and Scholarships**

Grants and scholarships awarded:

- Federal Supplemental Educational Opportunity Grant (FSEOG) *Note: see Campus-Based Policy for selection group criteria*
- Scholarships
- State Grants
- Need-based Institutional Grants

### **Determining Remaining Need**

Self-help aid will be awarded to meet remaining need as follows:

- Federal Direct Subsidized Loan
- Federal Direct Unsubsidized Loan
- Parent PLUS Loan
- Federal Graduate/Professional PLUS Loan

Students eligible for a Graduate/Professional PLUS loan who do not request the maximum Direct Unsubsidized loan amounts for which they are eligible, will be notified of their maximum Direct Unsubsidized loan eligibility. Students will also be notified of the loan interest rate for Direct Unsubsidized and Graduate/Professional PLUS loans and will be given the opportunity to request the maximum Direct Unsubsidized loan eligibility.

### **Estimated Financial Assistance**

The University will consider need-based aid, as well as non-need-based aid, as estimated financial assistance when packaging a student's aid. Estimated financial assistance includes, but is not limited to, the following:

- Federal Pell Grant
- Campus-Based Aid
- State Grants
- Scholarships
- AmeriCorps\*
- Fellowships or Assistantships
- Tuition Assistance
- Waivers and Discounts
- Direct Subsidized and Unsubsidized
- Direct Parent and Graduate/Professional PLUS Loans
- Private Loans

Iraq and Afghanistan Service Grants (IASG) are not considered estimated financial assistance (EFA). Therefore, IASGs are never included when determining whether a student's financial assistance exceeds need or cost of attendance. Likewise, if a student's other financial assistance exceeds need or COA; the IASG should not be reduced in eliminating the excess. However, an IASG may be reduced if it alone exceeds the student's COA.

If an IASG recipient becomes eligible for a Pell Grant during the award year, the University must treat the Pell Grant as EFA and may need to adjust the student's financial aid package.

\*The University will not count AmeriCorps benefits as EFA when determining eligibility for a Direct Subsidized loan; however, AmeriCorps benefits will be included when determining eligibility for a Direct Unsubsidized loan.

### **Overlapping Academic Years**

If a student begins a program at the University prior to the expiration of his/her previous program's academic year, the University will award federal financial aid based on the remaining portion of the overlapping academic year. The federal funds received for the prior academic year will not count as estimated financial assistance when awarding funds for the new program. However, the overlapping academic year's funding will be based on the remaining loan and grant eligibility, taking into account what the student received for in the program.

### **Awarding State Grants**

If a student is awarded state grant funds and an ISIR has a C-code(s) or is selected for verification, the University will not award the funds until the C-code(s) are resolved and verification requirements are met.

### **Conflicting Information and Other Resources**

The University is responsible for resolving conflicting information in a student's file. At times, the University may receive aid that it was unaware of for a student. If the aid was received after the end of the period of enrollment for a student who is still enrolled or who is intending to re-enroll, the University will treat the aid as EFA for the period of enrollment just completed.

## Private Loan Policy

### Overview

The Private Loans Policy addresses the University's participation in the private loan program. Private loans are available to help students supplement, not supplant, federal financial aid eligibility.

### Policy

The University participates in private loan programs for both students and families who are not eligible for need-based financial aid or who want to supplement federal and state financial aid. These loans are made privately through lenders and other financial institutions and are subject to a credit review and individual lender terms and conditions. For debt management purposes, the University encourages applicants to borrow wisely and to utilize funding solely for direct educational expenses related to attendance at the University.

### Eligibility

Private lenders determine student and/or parent eligibility for private loans. These amounts are limited to the cost of education minus other financial assistance.

### Application and Awarding Process

Students are strongly encouraged to complete the federal financial aid application process to determine eligibility for grants and direct loans prior to applying for a private loan. Most private loans are certified by the University to avoid over awarding. Students who apply and receive a private loan on their own must report it to the University as estimated financial assistance. The total amount of assistance received from all sources of funding, including scholarships, financial aid, tuition discounts and private loan programs cannot exceed a student's total cost of attendance (COA). Certain private loan products are limited to direct costs less other aid awarded.

### Disbursement

Private loans are disbursed via check or electronic funds transfer directly to the student's tuition account in a single disbursement at either the beginning of the loan period or school certification, whichever is later. Excess private loan funds are returned to the student upon their request, unless the loan is limited to direct educational costs.

### Leave of Absence (LOA)

A leave of absence (LOA) is a temporary interruption in a student's program of study, whether necessitated by a planned or an unanticipated event or circumstance. Students receiving only private loans are eligible for an LOA at the University. Refer to the *Leave of Absence Policy* for further information on LOA requirements.

### Over-award

If the total amount of assistance received from all sources of funding, as indicated above, exceeds the total COA, the University will return funds to the lender based on funds available on the student's tuition account. The *Over-awards Policy* determines this as follows:

1. Private Loan
2. Graduate/Professional/Parent PLUS Loan
3. Direct Unsubsidized Loan
4. Direct Subsidized Loan

## Refunds

If a student is out of attendance greater than 14 consecutive days and no LOA is approved, any excess private loan funds remaining after the Return of Title IV (R2T4) calculation and/or institutional refund calculation will be returned to the private loan lender if there is no longer a need based on the recalculated COA. However, if there is an increase in need based on the recalculated COA, excess funds are returned to the student. (Refer to the *Withdrawal Policy* for further information)

## Self-Certification Form

Students who are applying for a private loan are required to complete a Self-Certification form before the lender can disburse funds to the University. Students complete the form directly with the lender. However, the University may assist in completion of the form. If an enrolled or admitted student requests a self-certification form, the University will provide in written or electronic form the self-certification form developed by the Secretary. The University will continue processing federal financial aid funds and certifying loans in accordance with federal regulations.

## Professional Judgment Policy

### Overview

The Professional Judgment Policy addresses the University's treatment of a student, on a case-by-case basis, when the student has special circumstances that are not sufficiently addressed by a standard approach. Special circumstances include conditions that differentiate an individual student from a whole population of students.

### Policy

The University uses a professional judgment on a case-by-case basis. The reason is documented in a student's file as it relates to the student's special circumstances. Special circumstances include conditions that differentiate an individual student from a whole population of students. The University does not accept adjustments made for a student by another school, but reviews the student's circumstances and, if appropriate, documents the professional judgment decision made on the student's behalf. The University's decision regarding professional judgment adjustments is final and cannot be appealed to the U.S. Department of Education. (For additional information, refer to the *Student Parent Eligibility Policy* and the *HEROES Act Policy*)

### Special Circumstances

The purpose of professional judgment adjustments is to allow schools the ability to accommodate special circumstances; the U.S. Department of Education does not provide detailed information on when the University may make adjustments. Examples of adjustments in the law include the following:

- elementary or secondary school tuition
- medical or dental expenses not covered by insurance
- nursing home expenses not covered by insurance
- dependent care
- unusually high child care costs
- a student who is a dislocated worker
- the loss of employment of an independent student
- cases where a family member is a dislocated worker
- cases where a change in the student's housing status results in homelessness
- recent unemployment of a family member
- other changes in the family's income or assets

Special circumstances may also include the number of parents enrolled at least half- time in a degree, certificate or other program leading to a recognized educational credential at an institution with a program participation agreement, as described in HEA Sec. 487. Other changes may involve a family's income, a family's assets or a student's status.

The University may use professional judgment to increase or decrease one or more of the data elements used to calculate the Expected Family Contribution (EFC). The University may also use professional judgment to adjust the student's cost of attendance (COA). Inconsistent or conflicting information shown on the output document will be resolved before making any adjustments. Use of professional judgment is neither limited to nor required in the situations mentioned above.

The University will **not**:

- Modify either the formula or the tables used in the EFC calculation, but may only change values of specific data elements used in the EFC calculation.
- Use professional judgment to waive general student eligibility requirements or to bypass the intent of the law or regulations. For example, the University will not use professional judgment to change Federal Supplemental Opportunity Grant (FSEOG) selection criteria.



- Include post-enrollment activity expenses in a student's cost of attendance (for example, professional licensing exam fees are not allowable costs).

The University will use fairness during the decision making process and will not reduce the EFC based on recurring costs such as vacation expenses, tithing expenses and standard living expenses related to utilities, credit card expenses and children's allowances. In reviewing unusual expenses, the University reviews the income protection allowance (IPA) to determine if the expense is already included in the EFC calculation

Professional judgment categories include Dependency Override, Income Reduction/Loss, PLUS Exceptional Factor, Review of Enrollment History, Satisfactory Academic Progress (SAP), Selective Service, Unusual Expenses, and Parental Non-Support (PNS).

## Program Changes Policy

### Overview

The Program Changes policy details the University's treatment and determination of federal financial aid eligibility for students who change programs during an open payment period at the University. This policy does not apply to students requesting a program change during an approved leave of absence (LOA). An approved LOA is a temporary interruption in a student's program of study and students on an approved LOA must return to their original program of study. (Refer to the *Leave of Absence Policy* for further information).

### Policy

#### Program Changes

Federal regulations require the University to evaluate the federal financial aid award for a student who has changed programs during an open payment period to determine whether or not the student may remain in the same payment period or if the student will be required to begin a new academic year and payment period. For a student to be considered in the same payment period, all five (5) of the following conditions must be met:

- The student is continuously enrolled at the University.
- The courses in the payment period the student is transferring out of are substantially similar to the courses the student will be taking in the new program o Credits associated with the courses transfer to the new program
- The payment periods are substantially equal in weeks of instruction and credit hours
- There are little or no changes in tuition and fee charges associated with the payment period
- The credits successfully completed from the payment period the student is transferring out of are accepted toward the new program

#### If All Five Conditions Are Met

*If all five (5) conditions are met*, the student will remain in the original payment period and academic year. However, adjustments to disbursement dates, payment period start and end dates, and the academic year end date may be made to address any changes to when the student will complete the required credit hours and weeks of instructional time of the academic year.

#### If All Five Conditions Are Not Met

*If all five (5) conditions are not met*, the University will perform a Return of Title IV (R2T4) calculation to withdraw the student from the payment period for the program the student is transferring out of and update the program's academic year/loan period accordingly. (Please refer to the *Return to Title IV Policy* for additional information).

Once the Return to Title IV (R2T4) calculation has been completed and all required federal aid funds returned as required, the University will package the student for the new program based on a new academic year/ loan period as follows:

#### Federal Pell Grant Award

If the student is eligible for the Federal Pell Grant, the University must identify the amounts of Federal Pell Grant already received for the federal award year in the program the student transferred out of and determine the percentage of the student's annual scheduled Federal Pell Grant award already used.

To calculate the student's remaining eligibility, the University uses the following formula:

$$\frac{\text{Pell disbursed in prior program}}{\text{Scheduled Award in prior program}} = \% \text{ of Scheduled Award used}$$

The University then determines the maximum percentage of the scheduled Federal Pell Grant Award the student may receive in the new program by using the following formula:

100 Percent of Scheduled Award - Percentage of Scheduled Award used = **Maximum Percentage of Scheduled Pell Award student may receive**

When calculating the student’s Federal Pell Grant award, the University will also ensure the student does not exceed the Pell Lifetime Eligibility Used (Pell LEU).

The remaining Federal Pell Grant award amount is not divided equally across the payment periods in the new program. Instead, the Federal Pell Grant funds may be disbursed in an amount up to the student’s remaining eligibility for each payment period, except that no payment period disbursement can exceed 50% of the scheduled annual award.

*Federal Pell Grant Example:* A student transfers from the AAB program to the BSBA program at the University and all five conditions are NOT met.

<b>Pell Data from the prior program at the University</b>	
Scheduled Pell award	\$4,000
Pell award kept as a result of the R2T4 calculation	\$1,500

The University must now determine the student’s remaining Pell eligibility for the federal award year to determine the amount it may actually award to the student.

<b>Scheduled Pell Award</b>	\$4,000
<b>Percentage of Pell award already used in the prior program</b> (Pell award disbursed /Scheduled Pell award)	$\$1,500 / \$4,000 = 37.5\%$
<b>Percentage of remaining Pell eligibility</b> (100% - Percentage used)	$100\% - 37.5\% = 62.5\%$
<b>Students' remaining Federal Pell Award</b> (Scheduled award at University x Percentage remaining eligibility)	$\$4,000 \times 62.5\% = \$2,500$

The student’s remaining Federal Pell Grant eligibility is \$2,500. Since this amount is more than half of the scheduled Federal Pell Grant award, the award must be disbursed in two payment periods. The student may receive half of the scheduled Federal Pell Grant award in the first payment period, and the remainder of the amount in the second payment period as long as the second payment period falls in the same award year.

<b>Pell Disbursements in the new program at the University</b>	
First payment period	\$2,000
Second payment period	\$500

**Federal Direct Loan Award**

If the student is eligible for the Federal Subsidized and/or Unsubsidized Direct Loan program, the new academic year/loan period will be a full academic year/loan period and will be limited to the student’s remaining annual loan eligibility if the new program is at least an academic year in length. If the new program is less than an academic year in length or the remaining coursework represents less than an academic year in length, the student’s annual loan limit eligibility is the lesser of the remaining annual loan eligibility or the prorated loan eligibility based on credit hours to be completed in the new program.

*Direct Loan Example:* A student transfers from the AAB program to the BSBA program at the University, and all five conditions are NOT met. In the BSBA program, the student is a third year, independent undergraduate student with a maximum annual Subsidized Loan eligibility of \$5,500 and Unsubsidized Loan eligibility of \$7,000.

<b>Direct Loan Data from the Prior Program at the University</b>	
Subsidized Loan disbursed	\$1,688
Unsubsidized Loan disbursed	\$2,250

The University must now determine the student's remaining Subsidized and Unsubsidized Loan eligibility for the overlapping academic year in the BSBA program.

<b>Direct Loan Calculations to Determine Remaining Eligibility for New Loan Period in New Program</b>	
<b>Remaining Subsidized Loan Eligibility for New Programs LP</b> (Annual Subsidized Loan Limit - Subsidized Loan funds already disbursed)	\$5,500 - \$1,688 = \$3,812
<b>Remaining Unsubsidized Loan Eligibility for New Program LP</b> (Annual Unsubsidized Loan Limit - Unsubsidized Loan funds already disbursed)	\$7,000 - \$2,250 = \$4,750

These remaining loan fund amounts will be disbursed based on the payment periods in the new program's loan period at the University. (Refer to the *Disbursements Policy* for additional information)

### Other Federal Aid Awards

All other federal financial aid, including Federal Supplemental Opportunity Grant (FSEOG) will follow this same awarding process of finishing out the prior program's academic year.

### Program Change After Payment Period Is Completed

If the student changes programs **after** successfully completing a payment period and prior to starting another payment period, regardless of the five (5) conditions, the University will not perform an R2T4 calculation because the student completed the payment period for which funds were disbursed. Students in these scenarios will remain in the same academic year/loan period and will be required to complete the remaining credits and weeks of the academic year/loan period.

### Program Change Effective Date

The program change effective date will be the start date of the first course the student will attend in the new program. This is also known as the program begin date.

### Program Catalog Year Changes

A student enrolled at the University who changes catalog year of a program is not a student who is changing program for Title IV purposes. Therefore, the University will not reevaluate payment periods for students changing catalog year of the same program at the University.

## Re-Entry Policy

### Overview

The Re-entry Policy addresses how the University handles students who withdraw from the University and re-enter the same program within 180 days, re-enter into a different program, or re-enter after 180 days. The 180-day break is determined by counting the days between the student's official last date of attendance (OLDA) and the course start date when the student returns.

### Policy

#### Re-Entry Within 180 days

When a student withdraws from the University and re-enters within 180 days to the same program at the University, the student remains in the same payment period the student was in when originally withdrawn.

The cost of attendance for a student who re-enters within 180 days will reflect the original educational costs associated with the payment period from which the student withdrew.

The student is immediately eligible to receive all federal financial aid funds returned when the student ceased attendance. The University will take the following actions for a student who re-enters the same program within 180 days:

- Re-disburse federal financial aid that was disbursed and returned under the Return of Title IV (R2T4) provisions
- Disburse federal financial aid the student was otherwise eligible for that had not yet been disbursed at the time the student withdrew
- Cancel any overpayments assessed to the student as a result of the prior withdrawal that were disbursed on re-entry

The student becomes eligible for subsequent federal financial aid payments when the payment period for which paid is completed.

If the date of a student's return is outside the period for which the loan was originated, the University will extend the original loan period (LP) and originate a new loan. Additionally, if the scheduled date for a second disbursement is outside the period the loan was originated, the University will extend the LP and the date(s) for the second and any subsequent disbursement.

If a student returns to the University within 180 days and before federal financial aid funds are returned due to an R2T4 calculation, the University will not return the funds.

If a student withdrew, had a previous overpayment referred to Debt Resolution Services, and re-enters within 180 days, the University will send Debt Resolution Services a fax identifying the student overpayment. The fax will state the overpayment should be made void, as the student has returned to the University.

#### Re-Entry Within 180 days and in a New Award Year

If a student who re-enters the University within 180 days was originally enrolled in a payment period that began and was scheduled to end in one award year, but returns after the end of that award year, the University will disburse any remaining funds using the original award year as long as the original award year is still open. If the original award year is closed and the student is due additional Pell funds from the closed award year, the University will request the Pell Grant funds through the Common Origination and Disbursement (COD) website.

If the student was originally awarded campus-based funds, and the funds are no longer available from the original award year, the University may award funds from the current award year. However, this does not increase the annual maximum award a student may receive.

If the student was awarded Direct Loan (DL) funds and the original award year is still open, the University will recover the DL funds from that award year. If the original award year is closed, the University will award the student remaining DL funds using current award year paperwork. However, the original loan period dates along with original cost of attendance (COA) and expected family contribution (EFC) will be used to award the remaining DL funds.

**Re-Entry after 180 days OR Re-Entry into a Different Program**

When a student withdraws from the University and re-enters after 180 days have elapsed, or re-enters into a different program of study, the University will package the student based on new payment period. The length of the program will be the number of credit hours and weeks of instructional time remaining in the program the student re-enters. If the remaining credit hours and weeks of instruction constitute one-half of an academic year or less, the remaining hours will constitute one payment period.

If the start of the new academic year overlaps with a previous academic year, meaning the start of the new program begins before the calendar end date of the previous program's academic year, prior funds disbursed will be taken into consideration when packaging the student for the new academic program.

## R2T4 Policy

### Overview

The Return of Title IV Policy addresses federal financial aid recipients who withdraw from the University and are subject to a Return of Title IV (R2T4) calculation. For the purpose of R2T4 calculation requirements, a recipient is a student who has actually received federal financial aid funds or has met the conditions that entitled the student to a late disbursement of federal financial aid funds. The University is required to review the amount of federal loan and grant a student received for the payment period to determine what percentage of federal financial aid the student earned prior to withdrawal. The percentage of federal financial aid determined to be unearned for the payment period must be returned to the appropriate federal financial aid program(s).

### Policy

When a federal financial aid recipient withdraws from the University prior to the end of a payment period, a R2T4 calculation must be performed to determine the amount of federal financial aid funds earned as of the date of withdrawal. If the total amount of federal financial aid earned is less than the amount of federal financial aid funds disbursed to the student or on behalf of the student in the case of a parent PLUS loan, the difference between these amounts is returned to the applicable federal financial aid programs. If federal financial aid funds earned is greater than federal financial aid funds disbursed, the difference between these amounts is treated as a post withdrawal disbursement (PWD). An R2T4 calculation is not performed if the federal financial aid recipient withdraws after successfully completing the payment period AND all funds awarded for that period have been disbursed.

### Return Calculation

The amount of federal financial aid earned is calculated by determining the percentage of aid earned and applying this percentage to the total amount of federal financial aid disbursed and that could have been disbursed for the payment period. The payment period is defined as the period of time it takes the student to complete at least one-half of the weeks and credits in the student's academic year. For purposes of determining **earned federal financial aid**, a student's aid is considered disbursed if it is disbursed as of the student's last date of attendance. As long as conditions for a late disbursement (described below) are met prior to the date the student became ineligible (student's last date of attendance), any undisbursed federal financial aid will be counted as aid that could have been disbursed. However, if the undisbursed aid along with aid that has already been disbursed would cause the student to exceed his/her Pell Lifetime Eligibility Used (LEU) or Subsidized 150% Maximum Enrollment Period (MEP), the undisbursed aid will not be included as aid that could have been disbursed.

### Conditions for a Late Disbursement

- The U.S. Department of Education (ED) processed a Student Aid Report (SAR) or Institutional Student Information Record (ISIR) with an official Expected Family Contribution (EFC) for the student (except in the case of a parent PLUS loan)
- The University originated a Direct loan (DL)
- The University made the award to the student for a Federal Perkins loan or Federal Supplemental Educational Opportunity Grant (FSEOG)

The University does not include as a post withdrawal disbursement any funds the University was prohibited from disbursing on or before the date the student withdrew which would apply to the following: (Additional information is available in the *Disbursements Policy*)

- Second or subsequent disbursements of DL funds unless the student has graduated or successfully completed the loan period
- Second disbursements of DL funds for the period the University is prohibited from making until the student successfully completes one-half of the weeks of instructional time and one-half the credit hours in the academic year
- Disbursements of DL or Perkins loan funds for which the borrower has not signed a promissory note
- Disbursements of a Federal Pell Grant or Iraq Afghanistan Service Grant (IASG) to a student for whom the University did not receive a valid SAR or valid ISIR by the deadline date established by the Secretary in the Federal Register

- Federal Pell Grant or IASG funds for a subsequent payment period when the student has not successfully completed the earlier payment period for which the student has already been paid
- Disbursements of DL funds to a first-year, first-time borrower who withdraws before the 30th day of the student's program of study

### Inadvertent Overpayments

An ***inadvertent overpayment*** occurs when the University disburses funds to a student no longer in attendance but prior to the date the University determines the student withdrew from the program. This would include any federal financial aid fund disbursements made after the student's last date of attendance but prior to the University's determination that the student was withdrawn. These inadvertent overpayments are included in the R2T4 calculation as aid that could have been disbursed.

Only students who meet the late disbursement criteria are entitled to keep federal financial aid funds disbursed as an inadvertent overpayment. If the inadvertent overpayment cannot be made as a late disbursement, the University returns the entire amount of the federal financial aid funds disbursed. If the inadvertent overpayment can be made as a late disbursement, the University returns only the unearned portion of the inadvertent overpayment within 45 days of the University's date of determination that the student withdrew. Unearned inadvertent overpayments are returned according to the requirements for the return of unearned funds.

### Verification and the Return Calculation

If a student provides required verification documents after withdrawing from the University but within 30 days of the date of the notification informing the student of the requirements, and in time for the University to meet the 30-day Return deadline, the University performs the R2T4 calculation based on all federal financial aid the student had established eligibility prior to the withdrawal.

For the Federal Pell Grant Program, if the student provides the verification documents after the 30-day deadline but before the earlier of 120 days after the student's last date of attendance or the deadline established by ED each award year, the University reviews and addresses eligibility as required.

If the student does not provide all verification documents in time for the University to complete verification and meet the R2T4 deadlines, the University includes in the R2T4 calculation only the federal financial aid that was not subject to verification (unsubsidized and PLUS loan funds) and for which the conditions of a late disbursement were met prior to the student's withdrawal. (Refer to the *Verification Policy* for additional information).

### Institutionally Scheduled Breaks

Institutionally scheduled breaks of five or more consecutive calendar days are excluded from the R2T4 calculation. This includes all holiday, inclement weather, administrative, and emergency closure breaks of five or more consecutive days.

### When Funds are Disbursed Using Different Payment Periods

When the University disburses different types of aid using different payment periods, e.g., one payment period for disbursing grant funds and another payment period for disbursing DL, only one payment period is used in determining earned funds. The payment period ending later is used for the R2T4 calculation.

### Percentage of Earned Federal Financial Aid

The calculation of Percentage of Federal Financial Aid Earned includes all financial aid disbursed or that could have been disbursed to a student. The percentage is equal to the percentage of the payment period completed by the student as of the student's last date of attendance in the payment period. This percentage is determined using the University's rate of progression calculation.

If a student withdraws after successfully completing the payment period, 100% of the federal financial aid funds are earned and no calculation is required. If the withdrawal date occurs after the student completes more than 60% of the payment period, the student earns 100% of the federal financial aid funds.



### Rate of Progression Calculation

The percentage of the period completed is calculated as follows:

$$\frac{\text{Number of Calendar days completed in the payment period}}{\text{Total number of calendar days in the payment period}}$$

### Total Calendar days completed in the payment period

The total number of calendar days completed in the payment period (numerator) is the count of calendar days from the payment period start date to the official last date of attendance (OLDA).

### Required Adjustments to Calendar Days Completed in the Payment Period

Calendar days are **removed** from calendar days completed in the payment period if any of the following occurred between the payment period start date and the student's last date of attendance:

- Institutionally scheduled breaks of five (5) consecutive calendar days or more
  - Holidays
  - Inclement Weather
  - Administrative
  - Emergency Closures
- Student scheduled or selected breaks of five (5) consecutive calendar days or more between courses
- All approved Leave of Absence calendar days
- Unapproved breaks of less than 180 days (Refer to the *Re-Entry Policy* for further information)

### Total Calendar Days in the Payment Period

The total number of calendar days in a payment period (denominator) is determined based upon the number and type (credential level and modality) of credits awarded in the payment period.

### Required Adjustments to Calendar Days in the Payment Period

Additional calendar days must be **added** to the payment period for unsuccessful course(s) completions with grades of F, IF, or W that occurred in a course prior to the student's last date of attendance.

If the payment period needs to be extended, it is extended by a defined number of days based upon the following credential levels and modalities:

- For Online students:
  - 56 days (8 weeks) if one 3-credit course is needed
  - 84 days (12 weeks) if two courses are needed
  - 112 days (16 weeks) if three courses are needed
  - 140 days (20 weeks) if four courses are needed
- For Ground students:
  - 50 days (8 weeks) if one 3-credit course is needed
  - 75 days (12 weeks) if two courses are needed
  - 100 days (16 weeks) if three courses are needed or 125 days (20 weeks) if four courses are needed

*Please note:* Additional calendar days are not added for the course(s) in which the student's OLDA falls within. This includes any course(s) the student was enrolled in but did not complete at the time of withdrawal.

Calendar days are *removed* from the calendar days in the payment period if any of the following occurred or is scheduled to occur from the payment period start date to the payment period end date:

- Institutionally scheduled holiday breaks of five (5) consecutive calendar days or more
- Student scheduled of selected breaks of five (5) consecutive calendar days or more between courses
- All approved Leave of Absence calendar days
- Other periods of non-enrollment of five (5) consecutive calendar days or more (including administrative and inclement weather closures)
- Unapproved breaks of less than 180 days (Refer to the *Re-Entry Policy* for additional information).

Note: If a student withdraws, reenters, and withdraws again while in the same payment period, the calculation of both the **completed days** (numerator) and **total days** (denominator) for the **second or subsequent withdrawal** will include the following:

- If the "in progress course" where the first or prior official last date of attendance (OLDA) occurred has an A,B,C,D, or F grade, the completed days and total days will be from the start to the end date of the course regardless of the last academically related activity (ARA) posting for that course.
- If the "in progress course" where the first or prior OLDA occurred has a grade other than A, B, C, D, or F, the completed days and total days will include the days from the start date of the course to the prior OLDA (last ARA).

### Rate of Progression Examples

The following examples illustrate the rate of progression calculation outlined above. The figures provided are examples only; actual amounts may vary for each student.

#### Bachelor Program Online

- last date of attendance is 09/28/20xx
- Payment period is 09/01/20xx to 01/25/20xx

#### **Course Schedule:**

Course ID	Credits	Start Date	End Date	Instructor	Grade
Course#1	3.0	09/01/20xx	10/26/20xx	Smith	W
Course#2	3.0	10/06/20xx	11/30/20xx	Jones	
Course#3	3.0	11/03/20xx	12/28/20XX	Johnson	
Course#4	3.0	12/01/20xx	01/25/20xx	Brown	

#### Rate of Progression Calculation:

28 (Number of calendar days completed in the payment period)

168 (Total number of calendar days in the payment period)

- Number of calendar days completed in the payment period = 28 days
- Total number of calendar days in the payment period = 168 days (56 days for the progress course plus 112 projected days)
- Percentage of the payment period completed = 28 completed days/168 total days = .1666 or 16.7%

Days Completed	Total Days	Percentage of Payment Period Completed	Federal Financial Aid Disbursed For the Payment Period	Disbursed Financial Aid Earned*
28	168	16.07%	\$3,000	\$501

\*Estimate for illustrative purposes only

Bachelor Program Ground

- Last date of attendance is 08/30/20xx
- Payment period is 07/01/20xx to 11/25/20xx

**Course Schedule:**

Course ID	Credits	Start Date	End Date	Instructor	Grade
Course#1	3.0	07/01/20xx	08/19/20xx	Smith	A
Course#2	3.0	08/05/20xx	09/23/20xx	Jones	W
Course#3	3.0	09/02/20xx	10/21/20xx	Johnson	
Course#4	3.0	10/07/20xx	11/25/20xx	Brown	

Rate of Progression Calculation

$\frac{61 \text{ (Number of calendar days completed in the payment period)}}{160 \text{ (Total number of calendar days in the payment period)}}$

160 (Total number of calendar days in the payment period)

- Number of calendar days in the payment period = 61 days
- Total number of calendar days in the payment period = 160 days (85 days for successfully completed courses and in the progress course plus 75 projected days)
- Percentage of the payment period completed =  $\frac{61 \text{ completed days}}{160 \text{ days}} = .3812$  or 38.1%

Days Completed	Total Days	Percentage of Payment Period Completed	Federal Financial Aid Disbursed For the Payment Period	Disbursed Financial Aid Earned*
61	160	38.1%	\$3,000	\$1,143

\*Estimate of illustrative purposes only

**Title IV Credit Balance and the return calculation**

A Title IV credit balance created during the period is not released to the student nor returned to the federal financial aid programs prior to performing the R2T4 calculation. The University holds these funds even if, under the 14-day credit balance payment requirements, funds were otherwise required to be released.

In the R2T4 calculation, the University includes any federal financial aid credit balance as disbursed aid. Although not included in the R2T4 Calculation, any federal financial aid credit balance from a prior payment period in the academic year that remains on a student's account when the student withdraws is included as federal financial aid for purposes of determining the amount of any final federal financial aid credit balance when a student withdraws. Upon application of any applicable refund policies, a federal financial aid credit balance is allocated first to repay grant overpayments owed by the student as result of the current withdrawal.

Within 14 days of the date the University performs the R2T4 Calculation, the University will pay any remaining federal financial aid credit balance in one or more of the following ways:

- Pay authorized charges at the University
- Pay to the student (or parent for a PLUS loan)

The University applies its own refund policy before allocating a federal financial aid credit balance. However, the University does not actually complete the refund process before completing the steps for allocating the federal financial aid credit balance.

If the University is unable to locate the student (or parent) when attempting to pay a credit balance, it returns the funds to the federal financial aid programs. (Refer to the *Federal Financial Aid Credit Balance Policy* for further information)

## Return of Unearned Aid

In the R2T4 Calculation, the total Amount disbursed and Amount that Could Have Been Disbursed to the student or on the student's behalf, minus the Amount of Federal Financial Aid Earned by the student determines the amount of federal financial aid funds unearned and required to be returned to the funding source.

When a return of federal financial aid is required, the University and the student may both need to return funds. The University returns the lesser of the following amount to the appropriate federal financial aid programs:

- The total amount of unearned aid; or
- The amount equal to the total University charges incurred by the student for the payment period multiplied by the percentage of unearned aid

University (institutional) charges incurred by the student include tuition initially assessed to the student for the entire payment period. Initial charges are only adjusted for changes the University makes prior to the student's withdrawal. The amounts of institutional charges included in the R2T4 calculation are those charged or anticipated to be charged to the student's account. Although institutional charges may not have actually been charged due to the student's withdrawal, the University uses the actual charges to date, to include full tuition and fees for each course in the payment period and estimate the remaining charges based on the student's primary campus. Institutional charges include any tuition adjustments to correct invoiced charges that occur prior to the beginning of the course from which the student withdrew.

Tuition waivers for military students are not counted as Estimated Financial Aid (EFA) and will be subtracted from institutional charges in the R2T4 calculation.

If, after a student withdraws, the University changes the amount of institutional charges it assessed, or decides to eliminate all institutional charges, those changes do not impact the charges or aid earned in the calculation.

The University returns federal financial aid funds to the programs in the following order, up to the net amount disbursed from each source:

- Unsubsidized Federal Direct Stafford loans
- Subsidized Federal Direct Stafford loans
- Federal Perkins loans
- Federal Direct PLUS loans (Graduate student)
- Federal Direct PLUS loans (Parent of dependent student)
- Federal Pell Grants
- Federal Supplemental Educational Opportunity Grant (FSEOG)
- Iraq and Afghanistan Service Grant (IASG)

After the University allocates the portion of unearned funds, the student must return federal financial aid owed in the same order specified above. The amount of federal financial aid the student is responsible for returning is calculated by subtracting the amount returned by the University from the total amount of unearned federal financial aid funds to be returned.

- The student (or parent in the case of a parent PLUS loan) must return or repay, as appropriate, the calculated amount to any federal financial aid loan program in accordance with the terms of the loan; and any federal financial aid grant program as an overpayment of the grant. The amount of a grant overpayment due from a student is limited to the amount the original grant overpayment exceeds one-half of the total federal financial aid grant funds received by the student. (Additional information is available in the *Over-awards and Overpayments Policy*)

The University may round final repayment amounts, for which the University and student are responsible, to the nearest dollar.

## Timelines for Return of Funds

The University completes the R2T4 calculation within 30 days of the University's date of determination. The University returns the required amount of federal financial aid funds for which it is responsible as soon as possible but no later than 45 days after the date it determines the student has withdrawn. (Refer to the *Withdrawal Policy* for information on the University's date of determination) If a student is eligible for a post-withdrawal disbursement, refer to the Disbursements Policy for information on specific timelines.

### Deceased Student

If the University receives reliable information indicating an individual borrower or student for whom a parent received a PLUS loan dies, the University suspends further awarding and disbursements. An original or certified copy of the death certificate or accurate and complete photocopy of the original or certified copy of the death certificate is requested and forwarded to the Secretary of Education (Secretary). Under exceptional circumstances and on a case-by-case basis, the Secretary may approve a discharge based upon other reliable documentation supporting the discharge request.

### Determination of Withdrawal of a Deceased Student

The withdrawal date for a deceased student is the last date of academic attendance or attendance at an academically related activity determined from University attendance records. The date of determination is the date the University becomes aware of the student's death. (Refer to the *Withdrawal Policy* for further information)

### Return of Title IV Funds for a Deceased Student

The amount of federal financial aid funds earned by the student is calculated according to the Return of Title IV Funds (R2T4) calculation. If the calculation indicates the amount of funds earned is less than the amount disbursed to the student, or on behalf of the student in the case of a PLUS loan, the difference between these amounts is returned to the appropriate federal financial aid programs. The University does not report grant overpayments for deceased students to NSLDS or refer a grant overpayment to Debt Resolution Services, as the student's estate is not required to return any federal financial aid funds.

The following represents procedures the University follows if a credit balance of federal financial aid funds, created from funds disbursed before the death of the student, exists after the completion of the R2T4 and the University's refund calculations:

- Pay authorized charges owed to the University.
- Return any federal financial aid grant overpayments owed by the student for previous withdrawals from the University.
- Return any remaining credit balance to the federal financial aid programs.

If the University previously referred a grant overpayment to Debt Resolution Services, documentation will be forwarded by the University indicating the student is deceased. Based on this information and documentation, Debt Resolution Services will remove the overpayment from the student's records.

Although the student may be eligible to receive a post-withdrawal or late disbursement, the University is prohibited by federal financial aid Title IV regulations from further disbursements and will, therefore, not request additional funds from federal financial aid programs nor send out a post withdrawal letter.

## SAP Policy

### Overview

The University's Federal Financial Aid Satisfactory Academic Progress (SAP) policy determines whether an otherwise eligible student is making satisfactory academic progress in an educational program and may receive financial aid under the Title IV, HEA programs. This SAP policy does not supersede the University's academic SAP policy.

### Policy

Students must maintain SAP throughout the duration of their academic program to be eligible for federal financial aid. SAP is assessed by qualitative and quantitative measures and is evaluated at the end of each completed payment period in the student's academic program.

#### Qualitative Measure

##### *Grade Point Average*

Undergraduate students must have an overall programmatic grade point average (GPA) of 2.0 at the end of each completed payment period, unless otherwise defined by academic policy. Graduate students must have a program GPA of 3.0 at the end of each completed payment period.

A student's overall programmatic GPA is calculated using only those grades earned at the University that are applicable to the current program of study. The overall programmatic GPA is computed by adding the program applicable cumulative grade quality points earned (calculated by multiplying the credit hours and the weight of the grade earned in the course) and dividing it by the program applicable cumulative total number of credit hours completed.

Courses from which the student withdraws are not included in the overall programmatic GPA calculation for the qualitative measurement.

#### Qualitative Exclusions

The following are *excluded from the qualitative* computation:

- Waivers
- National Testing Programs
- Courses with the following grades:
  - AUDIT (AU)
  - Incomplete (I)
  - Passing (P)
  - Withdrawal (W)
  - No Credit (NC)
- Assessed Credits

#### Quantitative Measure

Each academic program has a published standard credit load for completion. The quantitative standard will automatically be evaluated for all periods of attendance at the University, including periods the student did not receive federal financial aid.

##### *Maximum Timeframe*

The maximum timeframe to complete the program cannot exceed 150% of the published length of the program measured in credit hours attempted for undergraduate and graduate students. Progress is evaluated cumulatively at the completion of each payment period for a student's primary program of study to ensure completion of the program within the 150% maximum timeframe.

If a student cannot complete the program of study within the maximum timeframe (as determined at the end of the payment period), the student will be placed on financial aid disqualification (FD) status and will not have the ability to appeal.

#### *Pace of Completion*

The quantitative measure – pace is calculated using the following formula:

$$\frac{\text{Cumulative number of credit hours the student successfully completed}}{\text{Cumulative number of credit hours the student attempted}}$$

At the end of each payment period, the student's pace of completion is evaluated. Students must earn at least 67% of the credit hours attempted toward completion of the primary program of study. Credit hours taken at other institutions and accepted toward a student's primary program of study at the University are included in both attempted and completed credit hours when measuring pace of completion.

Courses from which the student withdraws are counted as attempted credit hours when calculating the quantitative measurement or program pace.

#### **Included in Pace of Completion**

The following are included as attempted in the pace of completion calculation:

- Assessed Credits
- W status (Withdrawal)
- Courses completed with the following grades:
  - A, B, C, D, F, IA, IB, IC, ID, and IF (+/-)

#### **Evaluation**

The University evaluates SAP for student's primary program of study based on a completed payment period (generally, at least 12 credit hours). As a result of the evaluation, a student is assigned a federal financial aid SAP status.

#### **Financial Aid Warning**

Undergraduate students who have less than a cumulative 2.0 GPA, or otherwise minimum as stated in policy and graduate students who have less than a 3.0 GPA OR who do not earn 67% of the credits they attempt (cumulatively) at the end of a completed payment period, are automatically placed on "financial aid warning" (FW) status. The University can disburse federal financial aid funds to students on financial aid warning (FW) status for one payment period.

#### **Financial Aid Disqualification**

If a student on FW status does not meet SAP(qualitative and/or quantitative measure) at the end of the subsequent completed payment period, the student is not eligible for additional federal financial aid and will be placed on a financial aid disqualified (FD) status. Students who are placed on FD status are ineligible for federal financial aid.

#### **Financial Aid Probation**

Students who are granted an appeal will be placed on financial aid probation (FP) status and will have their financial aid eligibility reinstated based on the appeal. The University can disburse federal financial aid funds to students on FP status for one probationary payment period provided all other eligibility requirements are met. The student must meet the University's SAP standards to maintain federal financial aid eligibility.

#### **Student Notification**

The University will notify students at any point during their enrollment if they are placed on or taken off the FW, FP, FD or Regular Student (RG) statuses, as these affect student eligibility to receive federal financial aid.

## Student Financial Aid Appeals

Students placed on FD status due to a violation of the qualitative and/or quantitative standards during the financial aid warning period, may appeal the disqualification to regain eligibility for federal financial aid. Students may do so by submitting an appeal to the Student Financial Services – Operations Professional Judgment (SFS-O PJ) Team. If there are unusual circumstances that should be considered during the appeal process, federal financial aid reinstatement may be possible during a financial aid probation period.

Approval and/or reinstatement of federal financial aid eligibility are not guaranteed. The Professional Judgment team reviews all appeals on a case-by-case basis. Approval is only granted when there are significant extenuating circumstances. All decisions made by the Professional Judgment team are final.

The University will allow a student to have a maximum of two approved appeals during the time at the University. These appeals cannot be consecutive and will only be considered if unusual circumstances exist. Examples of unusual circumstances may include, but not limited to the following:

- Death of a relative
- An injury or illness of the student
- Other special circumstances

Students must explain in the appeals process why the nature and timing of their unusual circumstance(s) directly prohibited them from maintaining SAP, and what has changed in their situation that would allow them to demonstrate SAP at the next evaluation. If students have more than 12 credits remaining in their program of study, they must demonstrate they will be able to meet both the qualitative and quantitative measures. If students have 12 or less credits remaining, they must demonstrate the ability to complete the remaining credits successfully.

## Regaining Eligibility after Payment Period of Ineligibility

A student who is not making SAP regains eligibility only when the student complies with the University's SAP requirements. Therefore, if a student loses eligibility for federal financial aid as a result of not meeting SAP requirements, the student must pay for the ineligible payment period using non-federal financial aid funds.

If the ineligible payment period is the second payment period of an academic year/loan period already established, any federal financial aid awarded for the second payment period will be canceled and, if necessary, returned to the funding source.

If, after the ineligible payment period, the student meets all SAP criteria, the student's borrower based academic year (BBAY) will start at the beginning of the eligible payment period following the period of ineligibility.

## Maximum Timeframe

If at any time during the evaluation period it is determined a student is not going to complete the program of study within the maximum timeframe of 150% of the length of the educational program, the student becomes ineligible for federal financial aid. This determination cannot be appealed.

## Transfer Credits – Qualitative

A student's program GPA is calculated using only grades earned at the University in courses that are applicable to the program. Therefore, transfer credits will not apply when calculating the student's GPA at the University. Transfer credits include all credits applied toward the completion of the student's degree program.

## Transfer Credits – Quantitative

Credits taken at other institutions and applied towards the student's program at the University are included in both attempted and completed hours when measuring the student's pace towards completion.

## Program Changes

Students who change programs at the University will be re-evaluated to determine which credits apply to the new program. SAP is assessed by qualitative and quantitative measures and is evaluated at the end of each completed payment period in the student's new program.



If the five conditions of a program change are met, (refer to the *Program Changes Policy* for further information) the student's SAP status will remain as it was in the previous program because the student remains in his/her original payment period. If any one of the five conditions of a program change are not met, the student's SAP status will be set to RG (regular student) in the new program because the student is starting a new academic year and payment periods.

The University will calculate the qualitative and quantitative SAP measures based on all courses applicable to the new program. This includes those courses taken in a previous program that the student withdrew from, successfully completed, or failed.

### **Repeat Courses**

Grades for prior attempts are excluded when calculating the qualitative component. However, credits from all attempts are included when assessing if a student meets the quantitative component. Although a student may successfully complete a course more than once, only the first passing grade is counted as a completion when calculating the quantitative component.

### **Concurrent Enrollment**

The University will evaluate SAP for the primary program based on completed weeks and credits of a payment period, regardless of whether or not the student is enrolled concurrently. All credits completed at the University that are applicable to the primary program will apply toward the primary program's GPA.

## Student Parent Eligibility Policy

### Overview

The Student Parent Eligibility Policy addresses student and parent eligibility requirements that must be met prior to the University awarding and or the student receiving federal financial aid.

### Policy

The University will ensure that all students meet all eligibility requirements prior to awarding federal financial aid.

### Enrollment

Prior to awarding federal financial aid, the University will confirm the student is admitted to an eligible program of study eligible for financial aid (Refer to Financial Aid Eligibility Admission Requirements Policy for additional information). Any student enrolled in elementary or secondary institutions will not be eligible to receive federal financial aid.

### High School Diploma or Equivalent

Students must be qualified to study at the postsecondary level. For students attending the University, one of the following criteria must be met:

- High school diploma
  - A copy of the student's high school diploma
- Recognized equivalent of a high school diploma
- General Education Development (GED) certificate;
- California High School Proficiency Examination (CHSPE);
- HISET Completion Certificate
- Documentation provided by the State or appropriate Department of Education in the student's state or jurisdiction indicating that the student has earned a secondary completion credential that has the same rights, privileges, and rigor of a normal High School Diploma
- An academic transcript that indicates the student successfully completed at least a two-year program that is acceptable for full credit toward a bachelor's degree; or
  - A homeschool diploma that is conferred by the state in which it was completed or by an entity that is accredited by an approved body
  - A DD Form 214 Certificate of Release or discharge from Active duty, as long as it indicates that the individual is a high school graduate or equivalent

### Drug Convictions

Students become ineligible for Title IV federal financial aid if convicted of possession or sale of drugs for any offense that occurred during any period of enrollment for which the student was receiving federal financial aid funds. Any conviction that was reversed, set aside, or removed from the student's record does not count, nor does a conviction received when the student was a juvenile, unless the student was tried as an adult. If the student was convicted of both selling and possessing illegal drugs and the periods of ineligibility are different, the student will be ineligible for the longer period.

The University will make available to all students, through consumer information, details regarding the penalties for these types of drug violations. Additionally, the University will provide students, upon enrollment and through MyWest, a separate, clear and conspicuous written notice with information on the penalties associated with drug-related offenses.

Other departments will send notification to Student Financial Services – Operations (SFS-O) when becoming aware that a student has been convicted of any offense involving the possession or sale of illegal drugs, to cancel future federal financial aid disbursements. SFS-O will notify the student of lost eligibility due to a drug violation and provide information regarding the specific penalties, along with information on how to regain eligibility for federal financial aid.

### **Incarcerated Students**

The University must ensure that no more than 25% of its regular students are incarcerated. This percentage will be monitored for the latest completed award year.

An incarcerated student is someone serving a criminal sentence in a federal, state, or local penitentiary, prison, jail, reformatory, work farm, or other similar correctional institution. A student in a less formal arrangement, such as a halfway house, home detention, or sentenced to serve only weekends, is not considered to be incarcerated.

### **Title IV Eligibility for Incarcerated Students**

All incarcerated students are

- not eligible for Title IV loans
- eligible for FSEOG

Students incarcerated in federal or state penal institutions are

- not eligible for Pell grants

Students incarcerated by jurisdictions defined as a state in the law, such as the District of Columbia, are considered to be in a state penal institution and are

- not eligible for Pell Grants

Students incarcerated in local penal institutions (local or county jails, penitentiaries, correctional facilities, and juvenile justice facilities) are

- eligible for Pell grants

Students who are subject to an involuntary civil commitment following incarceration for a sexual offense are

- not eligible to receive Pell grants

### **Cost of Attendance for Incarcerated Students**

Cost of Attendance will include an allowance for tuition. No other expenses will be included. Allowable costs will be assessed at the rate designated in the University's Student Financial Aid budgets.

### **Regaining Title IV Eligibility for Incarcerated Students**

The University may accept a written self-certification indicating the student is no longer incarcerated.

### **Citizenship**

All students must be a U.S. citizen or national or U.S. permanent resident or other eligible noncitizen to receive federal financial aid.

A citizen of the Federated States of Micronesia, Republic of the Marshall Islands, or the Republic of Palau is eligible to receive federal financial aid under the Federal Pell Grant but is not eligible for Direct loans. Citizens of Palau are also eligible for FSEOG.

If a student needs to provide documentation to confirm his/her citizenship status and the student is unable to present this documentation in person, the University will allow the student to submit a hard copy or electronic image of the original document. Along with the citizenship documentation, the student must provide an affidavit. The affidavit requires two forms of identification and signature from the student.

## Secondary Confirmation

If a student indicates an eligible noncitizen on the FAFSA and provides an A-Number, identifying information will be automatically sent to the Department of Homeland Security (DHS) for primary and, if necessary, secondary confirmation. If the University receives a SAR/ISIR with a secondary confirmation match flag of "P," the DHS will continue to check its records in a process called automated secondary confirmation. The University will wait at least five, but no more than 15, business days for the result of automated secondary confirmation. If the result is not received by that time, the University will begin the paper process of secondary confirmation.

The University will furnish a written explanation to each student required to undergo paper secondary confirmation. The written explanation will be a clear explanation of documentation the student must submit as evidence showing the student satisfies the eligibility requirement, including a clear explanation of the student's responsibilities regarding providing proof of citizenship, deadlines, and the consequences of failing to complete any required action.

If the Social Security Administration (SSA) does not confirm the student's citizenship assertion under the data match with the Secretary, the student can establish U.S. citizenship by submitting documentary evidence of that status to the University within 30 days of the notice being received by the University to produce documentation of immigration status. During this period of time, and until the results of paper secondary confirmation are received, the University will not deny, reduce, or terminate aid to the student. If the documentation submitted supports the student's eligible noncitizen status, and if at least 15 business days have passed since the date the documentation was submitted to the U.S. Citizen and Immigration Service (USCIS), the University may disburse aid to an otherwise eligible student pending the USCIS response. If appropriate documentation is not submitted after at least 30 days, the student will be determined to be ineligible for federal financial aid.

The University will not make a determination that the student is an eligible noncitizen until the student has been provided an opportunity to submit the documentation in support of the claim of eligibility. The University will provide information concerning the consequences of failure to provide the documentation by the deadline set by the University. The University has ten business days after receipt of the documents for immigration status to undergo paper secondary confirmation. The University will notify the student of the final decision based on the secondary confirmation results.

## Default

Any student applying for federal financial aid must not be in default on a loan made under any federal financial aid program or HEA loan program.

## Loan Limits

A student is ineligible for federal financial aid if annual or aggregate loan limits made under any federal financial aid, HEA loan program have been exceeded or has property subject to a judgment lien for a debt owed to the United States.

## Overpayments

A student must not currently owe an overpayment of federal grant funds or Federal Perkins loan, to be eligible for federal financial aid.

## Eligibility for Direct and PLUS Loans

A student is eligible to receive a Direct Subsidized Loan, a Direct Unsubsidized Loan, or a combination of these loans, if the student meets the following requirements:

- The student is enrolled, or accepted for enrollment, on at least a half-time basis in a school that participates in the Direct Loan Program.
- The student meets the requirements for an eligible student.
- In the case of an undergraduate student who seeks a Direct Subsidized Loan or a Direct

Unsubsidized Loan at a school that participates in the Federal Pell Grant Program, the student has received a determination of Federal Pell Grant eligibility for the period of enrollment the loan is sought.

The annual loan limit for graduate and professional students is \$20,500. This amount is limited to Direct Unsubsidized loans only.

In the case of a borrower whose previous loan obligation was cancelled due to total and permanent disability, or discharged after a final determination of total and permanent disability, the borrower:

- Must obtain a certification from a physician that the borrower is able to engage in substantial gainful activity;
- Must sign a statement acknowledging that the Direct Loan the borrower receives cannot be discharged in the future on the basis of any impairment present when the new loan is made, unless that impairment substantially deteriorates; and
- If the borrower receives a new Direct Loan, other than a Direct Consolidation Loan, within three years of the date that any previous federal financial aid loan obligation was discharged due to a total and permanent disability, the student must resume payment on the old loan before receipt of the new loan.

In the case of a borrower whose prior loan under Title IV was conditionally discharged after an initial determination that the borrower was totally and permanently disabled based on a discharge request received prior to July 1, 2010—

- The suspension of collection activity on the prior loan has been lifted;
- The borrower complies with all the requirements;
- The borrower signs a statement acknowledging that the loan that has been conditionally discharged prior to a final determination of total and permanent disability cannot be discharged in the future on the basis of any impairment present when the borrower applied for a total and permanent disability discharge or when the new loan is made, unless that impairment substantially deteriorates; and
- The borrower signs a statement acknowledging that the suspension of collection activity on the prior loan will be lifted.

A graduate/professional student or parent is eligible to receive a Direct PLUS Loan if the following requirements are met:

- Student completes a current award year Free Application for Federal Student Aid (FAFSA)
- The parent borrower is the student's biological or adoptive mother or father or the student's stepparent if their income and assets are taken into account when calculating the student's EFC
- The parent borrower is borrowing to pay for the educational costs of a dependent undergraduate student who meets the requirements for an eligible student
- The parent borrower provides a social security number for themselves and the student
- Student or parent borrower meets the requirements pertaining to citizenship and residency
- Student or parent borrower meets the requirements concerning defaults and overpayments
- Student or parent borrower is not incarcerated
- The federal government does not have a judgment lien on the parent's property
- Complies with the requirements for submission of a Statement of Educational Purpose for the student, except for the completion of a Statement of Selective Service Registration Status
- Student or parent borrower does not have an adverse credit history
- Student or parent borrower has an adverse credit history but has obtained an endorser who does not have an adverse credit history; or has an adverse credit history but documents to the satisfaction of the Secretary that extenuating circumstances exist (effective March 29, 2015, applicants must complete PLUS loan counseling before receiving the PLUS loan).

### **PLUS Exceptional Factor**

Dependent students whose parents are unable to borrow PLUS loans due to adverse credit or other exceptional circumstances may receive additional Direct unsubsidized loans for the same amount as independent undergraduate students. The PLUS exceptional factor is not a dependency override as parent information is provided on the FAFSA. Examples include:

- The parent(s) is incarcerated.
- The parent's whereabouts are unknown.
- The parent(s) has filed for bankruptcy and has provided a letter from the bankruptcy court stating that as a condition of the bankruptcy filing, the parent(s) may not incur any additional debt.

- The parent's income is limited to public assistance or disability benefits and the University has documented that the parent would not be able to repay the PLUS loan.
- The parent(s) of a dependent student is not a U.S. citizen or permanent resident, or is unable to provide evidence from the U.S. Citizenship and Immigration Service (USCIS) that he or she is in the United States for other than a temporary purpose with the intention of becoming a citizen or permanent resident.

Supporting documentation may include, but is not limited to, supporting documentation that corroborates the exceptional circumstances. The University will re-examine and document that the exceptional circumstances continue to apply before packaging/originating additional unsubsidized loan amounts for the dependent in a subsequent award year.

### Selective Service

The University will require males who are age 18 through 25 to register with the Selective Service System. Students, who are exempt or waived from this requirement, will be asked to provide the University with the supporting documentation for review. The review process will be documented along with the supporting documentation provided. If after review, the student is not clearly exempt or waived from the requirement to register the University will ask the student to provide a Status Information Letter from the Selective Service. If the University determines a student's non-registration with the Selective Service was knowing and willful, the student will not be eligible to receive any federal financial aid.

### Unusual Enrollment History (UEH) (UEH)

The University will resolve an Institutional Student Information Record (ISIR) that reports a UEH flag prior to awarding a student Title IV funds. The UEH flags are:

- "N" – No resolution is required by the university; the student's enrollment pattern is not unusual
- "2" - the University will review the student's enrollment and financial aid records to determine if, during the four-award year review period (Award Years 2012/2013, 2013/2014, 2014/2015, and 2015/2016), the student received a Pell Grant or Direct Loan at the University.
- "3" - the University will review the student's academic records to determine if the student received academic credit at the University and at each of the previously attended schools during the four-award year period (Award Years 2012/2013, 2013/2014, 2014/2015, and 2015/2016). In addition, the University will review the National Student Loan Data System (NSLDS) to identify all schools where the student received Pell Grant or Direct Loan funding over the past four award years.

The University will determine, for each of the previously attended schools, whether academic credit was earned during the award year which the student received Pell Grant or Direct Loan funds. This determination will be based upon academic transcripts already obtained by the University or by asking the student to provide the academic transcripts or grade reports.

Students who do not show earned credit for the Pell or Direct Loan awards received in the past four years, and who may have special circumstances, may submit a request through the Professional Judgment (PJ) Team for approval.

Students who do not meet any of the above criteria are immediately not eligible for aid.

### Approval of Continued Eligibility for UEH

If the students continued eligibility for federal financial aid funds is approved and in order for the student to remain eligible for federal financial aid funds, the student must successfully complete one payment period at the University.

### Denial of Continued Eligibility for UEH

If the student does not earn academic credit at one or more of the relevant schools and does not provide acceptable documentation, the University will deny the student any additional federal financial aid funds.

### Regaining Eligibility for UEH

The student will be required to successfully complete one payment period at the University to regain federal financial aid eligibility. During this time, the student will be required to use an alternate method of payment for tuition and fees. Upon regaining eligibility, loans may be awarded retroactively back to the beginning of the AY but Pell grants will only be awarded going forward/starting with the next payment period.

## Subsequent ISIRs Policy

### Overview

The Subsequent ISIRs Policy addresses the University's role in reviewing any Institutional Student Information Record (ISIR) the University receives after awarding a student federal financial aid funds.

### Policy

The University is required to resolve any discrepancies in federal financial aid related information. Therefore, the University reviews all subsequent Institutional Student Information Record (ISIR) transactions received for a student for the entire federal processing aid year (July 1 to June 30).

### Subsequent ISIRs

A subsequent ISIR is an ISIR received when a student or other institution changes information after the University has awarded the student federal financial aid funds. The University is required to review any data element change made by the student or other institution, which may affect eligibility for federal financial aid or the amount and type of federal financial aid awarded. The University will not disburse federal financial aid funds until the changes made to a subsequent ISIR are confirmed and/or corrected.

If a subsequent ISIR is received after verification is completed, the University will collect documentation to support the change or correct the ISIR back to the verified information. The University does not accept changes based on marital status changes.

The University will not disburse federal financial aid until all conflicting information has been resolved, even if the conflict concerns a previous award year. The findings are documented in the student's file.

If a subsequent ISIR is received with changes to C Flags and comment codes or the EFC, the University will review and collect the required documents. If a subsequent ISIR is received because the National Student Loan Data System (NSLDS) has provided new or updated information to the University, the NSLDS history is reviewed to determine if changes are needed to existing awards. This information may include indications a student has gone into default or owes an overpayment. It may also indicate a student has resolved a default and is now eligible for federal financial aid funds.

Once the subsequent ISIR is reviewed and eligibility to receive federal financial aid is determined, if necessary, the student will be sent a revised award letter reflecting any changes.

If, after reviewing the subsequent ISIR, it is determined the student is ineligible for federal financial aid, the student is notified via a letter of ineligibility.

## Verification Policy

### Overview

Institutions are required to verify information provided by students selected for verification. The Verification Policy addresses the different verification groups and types of documents acceptable to complete the verification process.

### Policy

The University is required to verify students whose FAFSA information is selected for verification by the Central Processing System (CPS). The Institutional Student Information Record (ISIR) or Student Aid Record (SAR) document received from the CPS will indicate whether the student's application has been selected for verification. Once the CPS has selected a student, the University will verify all required student information.

#### Standard Verification Group (V1)

The University is required to verify the following information for students selected for standard verification:

- Tax Filers
  - o Adjusted Gross Income
  - o U.S. Income Tax Paid
  - o Untaxed Portions of IRA Distributions
  - o Untaxed Portions of Pensions
  - o IRA Deductions and Payments
  - o Tax Exempt Interest Income
  - o Education Credits
  - o Number of Household Members
- Number in College
- Supplemental Nutrition Assistance Program (SNAP)
- Child Support Paid by the student (or spouse), the student's parents, or both, if indicated on the ISIR
- Non-Tax Filers
  - o Income Earned from Work
  - o Number of Household Members
- Number in College
- Supplemental Nutrition Assistance Program (SNAP)
- Child Support Paid by the student (or spouse), the student's parents, or both, if indicated on the ISIR

#### Custom Verification Group (V4)

The University will verify the following information for students selected for custom verification:

- High School Completion Status
- Identity/Statement of Educational Purpose
- SNAP
- Child Support Paid by the student (or spouse), the student's parents, or both, if indicated on the ISIR

#### Aggregate Verification Group (V5)

The University will verify the following information for students selected for aggregate verification:

- High School Completion Status
- Identity/Statement of Educational Purpose
- Tax Filers:
  - Adjusted Gross Income
  - U.S. Income Tax Paid
  - Untaxed Portions of IRA Distributions



- Untaxed Portions of Pensions o IRA Deductions and Payments
- Tax Exempt Interest Income o Education Credits
- Number of Household Members
- Number in College
- Supplemental Nutrition Assistance Program (SNAP)
- Child Support Paid by the student (or spouse), the student's parents, or both, if indicated on the ISIR ? Non-Tax Filers:
- Income Earned from Work o Number of Household Members
- Number in College
- Supplemental Nutrition Assistance Program (SNAP)
- Child Support Paid by the student (or spouse), the student's parents, or both, if indicated on the ISIR

Students not selected for verification by CPS or students who are exempt from verification, but choose to provide taxes or other supplemental forms will not be considered selected for verification. However, documents provided to the University will be used in reviewing the student's application and as the basis in correcting reported application items. This documentation may result in conflicting information, which the University must resolve prior to processing federal financial aid. All documents provided by the applicant will be reviewed and retained as part of the student financial aid file.

### Household Resources Verification Group (V6)

The University will verify the following information for student selected for household resources verification:

- Tax Filers:
  - Adjusted Gross Income o U.S. Income Tax Paid o Education Credits
- Non-Tax Filers:
  - Income Earned from Work
- Other Untaxed Income (Tax Filers and Nontax Filers)
  - Untaxed Portions of IRA Distributions
  - Untaxed Portions of Pensions
  - IRA Deductions and Payments
  - Tax Exempt Interest Income
  - Other Untaxed Income on the FAFSA
  - Payments to tax-deferred pension and savings
  - Child support received o Housing, food, and other living allowances paid to members of the military, clergy, and others
  - Veteran's non-education benefits
  - Money received or paid on the applicant's behalf
  - Other Untaxed Income
- Number of Household Members
- Number in College
- SNAP, if included on the ISIR
- Child support paid, if included on the ISIR by the student (or spouse), the student's parents, or both, if indicated on the ISIR

### Acceptable Documentation V1 and V5

The University will be considered to have verified the following verifiable items if selected students retrieved and transferred their income tax return information using the IRS Data Retrieval process:

- Adjusted gross income (per computer)
- Income tax paid (per computer)
- Untaxed IRA distributions
- Untaxed pensions
- Education tax credits (per computer)<sup>1</sup>
- IRA deductions
- Tax exempt interest income

Under certain conditions, students, spouses and/or parents will need to submit their IRS Tax Return Transcript from the IRS for the specified tax year. These conditions are as follows:

- If a student, spouse, or parent has not successfully transferred information from the IRS,
- Information included on the FAFSA using the IRS Data Retrieval was subsequently changed,
- When a married independent student and spouse filed separate tax returns
- When the parents of a dependent student filed separate tax returns,
- When a student or student's parent had a change in marital status after the end of the specified tax year on December 31
- When the student, parent, or spouse filed an amended tax return

### Situations Where Acceptable Documentation May Not Be Available

Situations may occur where a student, spouse, and/or parent may not be able to provide acceptable documentation to resolve verification. The University will accept the following as resolution.

#### Individual Unable to Obtain IRS Transcript

If an individual is selected for verification but is unable to obtain a transcript from the IRS, all the following alternative documentation must be submitted to the University by the tax filer:

1. A signed copy of the relevant 2014 IRS tax return that was filed with the IRS
2. A statement from the tax filer, on or attached to the tax return, which certifies the tax return submitted to the University contains the same information as that which was submitted to the IRS
3. Documentation from the IRS that the transcript request was unsuccessful
  - a. For transcripts request using the IRS online transcript request process, a signed and dated copy of the screen shot from the official IRS web page that displays a message indicating the transcript request was unsuccessful
  - b. For transcripts requested using IRS Form 4506T-EZ or Form 4506-T, a copy of the IRS response that was mailed to the tax filer stating the IRS could not provide the transcript. The copy of the IRS response must be signed and dated by the tax filer
4. A completed and signed IRS Form 4506T-EZ or Form 4506-T that includes the name, address, and telephone number of the institution as the third party to whom the IRS is to mail the 2014 IRS transcript. The University will retain the IRS Form 4506T-EZ or Form 4506-T. If any questions arise about the accuracy of the information on the signed copy, the University will submit the IRS Form 4506T-EZ or Form 4506-T to the IRS and wait for the IRS to return the transcript or confirmation that a transcript is not available for that tax filer.

### Victims of Identity Theft

Tax filers who have been victims of identity theft are unable to obtain tax information using the IRS data retrieval tool and are unable to receive an IRS tax transcript until the matter is resolved by the IRS. In these instances, the University may accept an alternate transcript known as The Transcript Data Base View (TRDBV) requested by the tax filer from the IRS as well as a signed and dated statement from the victim stating he/she was a victim of tax-related identity theft and the IRS is aware of this. If a victim is unable to obtain a TRDBV transcript, he/she may submit other official IRS documentation as long as it contains all the information needed to complete verification.

### Amended Tax Return

When the University becomes aware that a tax filer has filed, or will file, an amended tax return, it will obtain the following:

- An IRS Tax Return Transcript (will only include information from the original tax return and does not have to be signed), or any IRS transcript that includes all the income and tax information required for verification AND
- A signed copy of the 1040X that was filed with the IRS

The University will use the information found on both forms when completing the verification process.

### Copy of a Paper Tax Return

The University will accept a signed copy of a tax return for individuals completing verification who- ? Filed an amended tax return

- Files a non-IRS tax return
- Are unable to use the IRS DRT or to obtain an IRS Tax Return Transcript due to authentication issues with the IRS

### Other Tax Returns

If the tax filer filed a tax return with Puerto Rico, the U.S. Virgin Islands, American Samoa, the Commonwealth of the Northern Mariana Islands, or Guam, the University will obtain a copy of a transcript of the tax filer containing their tax information, as long as the transcript is available at no charge from that jurisdiction's taxing authority. A signed copy of a filed tax return that was filed with the taxing authority is only acceptable if the tax filer is unable to obtain a free copy of a transcript.

If the student, spouse, and/or parent is a resident of the Republic of the Marshall Islands, the Republic of Palau, or the Federated States of Micronesia, the University will accept a copy of the individual's Wage and Tax Statement from each employer and a signed statement identifying all of the individual's income and taxes for the tax year.

If the filer filed a tax return with a foreign country, the University will accept signed copies of that tax return or other documentation. The income and tax information will be converted to U.S. dollars and the University will use the information on the forms that most closely correspond to the income information reported on an IRS tax return. If an individual from a foreign country is not required, under the country's government agency rules, to file an income tax return, the University will accept a signed statement from the individual certifying all income and taxes paid for the tax year.

### Filing Extensions

If the IRS has granted the individual a filing extension, the University must accept the following as documentation:

- A copy of the IRS Form 4868 "Application for Automatic Extension of Time to File U.S. Individual Income Tax Return" or approval of extension longer than six months, and
- A copy of the IRS Form W-2 for each source of employment income received for the applicable tax year by an individual that has been granted a filing extension, or
- A signed statement by a self-employed individual certifying the amount of the AGI and U.S. income tax paid for the specified tax year

*Note:* If the University receives the transcript, it must verify the AGI and taxes paid. However, the University may not delay verifying a student's FAFSA information until the tax return is received if the student provides the above documentation.

If the individual has requested a transcript that lists tax account information for the specified tax year and the IRS, a government of a U.S. territory or commonwealth or a foreign central government cannot provide or locate a transcript, the University must accept the following:

- A copy of IRS Form W-2 for each source of employment income received for the specified tax year
- A signed statement by a self-employed individual or an individual that has filed an income tax return with a government of a U.S. territory or commonwealth or a foreign central government certifying the amount of AGI and taxes paid.

### Non Tax Filers

Students, spouses, and/or parents who have not filed a tax return, and are not required to file, will not have an AGI. They would instead report income earned from work on the FAFSA, which includes any income reported on the individual's W-2 forms, and other earnings from work not reported on these forms. If selected for verification and income was earned, the student, spouse, and/or parent will be required to provide copies of W-2 forms from each employer. If a W-2 is not available, the University will accept a signed statement explaining the reason the W-2 form is not available as well as the amount earned and the source of income.

Although the U.S. Department of Education does not require the University to have special knowledge or expertise regarding the U.S. tax code, if a student, spouse, and/or parent submits a signed statement claiming non-tax filer status and the University has reason to believe that student would have been required to file a U.S. tax return, this constitutes conflicting information and must be resolved. The University will require the applicant to submit a "Verification of Nonfiling Letter" from the IRS indicating that the tax filer did not file an IRS income tax return for the tax year being verified.

### Supplemental Nutrition Assistance Program (SNAP)

The University will accept the following to verify SNAP benefits received, as long as the benefits are indicated on the student's ISIR:

- A statement signed by the student or, if the student is a dependent, by one of the student's parents, affirming that SNAP benefits were received by someone in the household during the 2013 and/or 2014 calendar years
- If the University believes the signed statement provided by the student regarding the receipt of SNAP benefits is inaccurate, the student must provide the University with documentation from the agency that issued the SNAP benefits

### Child Support Paid

The University will accept the following to verify child support paid, as long as the child support paid is indicated on the student's ISIR:

- A statement signed by the student or parent, as appropriate, certifying
  - The amount of child support paid
  - The name of the person who paid the child support
  - The name of the person to whom child support was paid; and
  - The names of the children from whom child support was paid
- If the University believes the information provided in the signed statement is inaccurate, the University will obtain documentation, such as
  - A statement from the individual receiving the child support showing the amount provided; or
  - Documentation that the child support payments were made (copies of child support checks, money order receipts, or similar records of electronic payments having been made)

### Number in Household

The University will accept a signed statement by the student and, if the student is a dependent, by one of the student's parents, that lists the name and age of each household member and the relationship of that household member to the student.

A dependent student's legal parents, who live together, regardless of marital status or gender, are required to provide information on the FAFSA and for verification.

### Number in College

The University will accept a signed statement from the student (and one parent, if the student is a dependent) listing the name, age, and relationship of each household member to the student (or parent, if the student is dependent) who is or will be attending an eligible postsecondary educational institution at least half-time during the specified award year and the name of that educational institution.

If the University has reason to believe the signed statement is inaccurate, the University will obtain a statement from each listed institution that the household member is, or will be attending on at least a half-time basis unless it is determined that the listed institution determines that-

- statement from each listed institution is not available because the household member in question has not yet registered at the institution he or she plans to attend; or
- the household member in question will be attending the same institution as the student.

### Acceptable Documentation V4 and V5

The University will accept the following as resolution of V4 and V5 verification.

#### High School Completion

To verify high school completion, the University will accept a copy of the following types of documentation:

#### High school diploma—

- \* A copy of the student's high school diploma;
- \* A copy of the student's final high school transcript that shows the date a high school diploma was awarded; or

#### Recognized equivalent of a high school diploma—

- \* General Educational Development (GED) Certificate
- \* California High School Proficiency Examination (CHSPE) Certificate
- \* HiSET Completion Certificate
- \* Documentation provided by the State or appropriate Department of Education in the student's state or jurisdiction indicating that the student has earned a secondary completion credential that has the same rights, privileges, and rigor of a normal High School Diploma
- \* A copy of the 'secondary school leaving certificate' or similar document, obtained from the appropriate government agency, for students who completed secondary school in a foreign country
- \* An academic transcript indicating the student successfully completed at least a two-year program that is acceptable for full credit toward a bachelor's degree
- \* A DD Form 214 Certificate of Release or Discharge from Active Duty, as long as it indicates that the individual is a high school graduate or equivalent
- \* A homeschool diploma that is conferred by the state in which it was completed or by an entity that is accredited by an approved body

*Note:* In cases where it is impossible for a refugee, an asylum or a victim of human trafficking to obtain documentation of his/her completion of a secondary school education in a foreign country, the University may accept self-certification. It must consist of the following:

- Proof of their attempt to obtain documentation of their completion of a secondary school education in a foreign country, i.e., a copy of an e-mail or letter, including proof of mailing;
- A signed and dated statement that indicates that the applicant completed his or her secondary school education in a foreign country, the name and address of the foreign high school where the applicant completed the secondary school education and the date when the foreign high school diploma was awarded.
- A copy of the entry status documentation that identifies the applicant's current or prior status as a refugee, an asylum, or as a victim of human trafficking and who entered the United States after the age of 15.

### Identity/Statement of Educational Purpose

The following is acceptable documentation to verify a student's statement of educational purpose/identity:

- A government-issued photo identification, such as a driver's license or passport (cannot be expired)
- A signed statement certifying the federal financial aid received will only be used for educational purposes to pay the cost of attending the University for the specified award year.

If the documentation is presented in person, the University will maintain an annotated copy of the ID provided by the student and will include the date the identifying document was received and the name of the University official who obtained the documentation.

If the student is unable to provide the information in person, the following must be provided to the University:

- A copy of a government-issued photo identification, such as a driver's license or passport
  - The copy of the government issued ID does not need to be notarized or signed by the notary; and
- An original notarized statement of educational purpose signed by the student for the specified award year.
  - An original document must contain wet signatures for the student and the notary as well as the required stamp or seal.

### Acceptable Documentation V6

The University will use \$4,160 3per member of the household for the V6 income threshold.

The following are acceptable documentation for V6 verification:

- A signed statement from the student (and parent if dependent) listing
  - Source(s) of untaxed income
  - Amount received from each source
- A copy of each W-2 form received for 2013
- Verification of V1 items
- Verification of child support paid and SNAP, if reported on the ISIR

### Selection after Disbursement

The student or the University may submit corrections to the SAR/ISIR and the student's application may then be selected for verification. If the student's enrollment status is Withdrawn (W), the University will not be required to verify the student's information unless the student returns to the University in the same award year. If the student's enrollment status is anything other than withdrawn (W), the University will not make subsequent disbursements until the student's updated application is verified. If the student does not submit verification documents, the University will return any Pell, IASG, or FSEOG funds disbursed prior to selection on the student's behalf. (Refer to the 2014/2015 Federal Financial Aid Required Verification document for specific scenarios.)

### Completing Verification

When the University has obtained all necessary verification documents from the student, the documentation is compared to the ISIR/SAR record. If the verification process shows a student's information is correct, and there are no outstanding issues or conflicting information, the student will be awarded. If the verification process shows the student information requires corrections, the awarding process will not continue until the University receives a final and valid federal output document (ISIR) with an official EFC.

If the University has reason to believe a student is trying to avoid completing verification requirements and /or suspects' potential fraud, the University will investigate the reasons of the student and not award federal financial aid funds for the payment period. If resolution cannot be reached, the student will lose eligibility for funds within that award year.

If a student was selected and does not complete verification, and the University disbursed unsubsidized aid to the student, all of the unsubsidized aid that was disbursed for the award year must be returned. If it is determined the student was ineligible, the University will return, on the student's behalf, any loan amount disbursed. The University will also notify the appropriate loan service of any loan funds disbursed directly to the student. This is so the Department of Education can issue a 30-day demand letter to the student.

Verification is complete once the University has all requested documentation and a valid ISIR or SAR (one that contains all the accurate and complete information). This includes any corrections, which must be made by the applicable federal deadlines.

### **Interim Disbursements**

The University will not make any interim disbursements during the verification process.

### **Change in Marital Status**

The University will not update a student's dependency status based on a change in marital status. However, if the student can provide documentation showing support of the spouse or others of more than 50%, those individuals may be included in the student's household size.

### **Using a Joint Tax Transcript to Determine Individual AGI and Taxes Paid**

If the filer of a joint return has become widowed, divorced, or separated since filing the return, it may be necessary to determine the individuals' income and taxes paid using the joint tax transcript and the relevant IRS W-2 forms for verification purposes.

The following documents are required from the student/spouse/parent in order to perform a separation of income (SOI):

- A signed and dated SOI Authorization Form, and
- Applicable Federal tax year transcripts, and
- W-2 Forms, and
- In some scenarios, all schedules, forms, and/or worksheets for the tax filing

The University will confirm or update the AGI and income based on the documentation submitted and use the proportional distribution method to determine taxes paid.

### **Resolving Conflicting Information**

If the University has conflicting information concerning a student's eligibility or has any reason to believe a student's application information is incorrect, the University will resolve such discrepancies before disbursing federal financial aid funds. If discrepancies are discovered after disbursing federal financial aid funds, the University will reconcile the conflicting information and require the student to repay any funds for which he or she was ineligible, unless the student is no longer enrolled for the award year.

Examples of conflicting information may include (but are not limited to) the following:

- Social security numbers
- Date of birth
- Legal name
- Discrepant tax data (including whether or not the student/parent was required to file a tax return)
- Household size or marital status

### **Consequences of a change in FAFSA Information**

For the subsidized student financial assistance programs (includes the Federal Pell Grant, Federal Supplemental Educational Opportunity Grant (FSEOG), Federal Perkins Loan, and Direct Subsidized Loan Programs), if FAFSA information changes because of verification, the University will submit to the

Secretary any changes to a non-dollar item or an individual data element that is \$25 or more. The University may choose whether it will submit changes to the Secretary when all changes to individual data elements are less than \$25 (not exceeding tolerance).

For the Federal Pell Grant Program, if there is a change as a result of verification, the University will recalculate the student's Pell Grant on the basis of the EFC on the correct valid SAR/ISIR and disburse any additional funds under that award only if the University receives a correct valid SAR/ISIR for the student and only to the extent that additional funds are payable based on the recalculation.

For all other subsidized student financial assistance programs, if information changes as a result of verification, the University will adjust the student's financial aid package based on the corrected EFC on the valid SAR/ISIR.

### Verification and Professional Judgment

The University will complete the verification process before exercising any type of professional judgment.

### Reporting a Student's Verification Status to the CPS

When the University disburses a Pell award, it will report the student's verification status at the time of disbursement when it reports the payment. Note: This reporting requirement applies even if the student's application was not selected for verification. However, the University will leave the verification status code field blank in PeopleSoft if the student was not selected for verification or if a selected transaction has a CPS transaction process date that is after the date the student was withdrawn from the University.

### Verification Timelines

The University will require Pell, Campus-Based and Direct loan students selected for verification to submit all requested verification documents to the University within 30 days of the date of the notification informing the student of the requirements. If the documents are not submitted or incomplete by this deadline, appropriate actions will be taken as required based upon the student's enrollment status as of the deadline date.

For the Federal Pell Grant Program, if the student provides the verification documents after the 30-day deadline, but before the earlier of 120 days after the student's last date of attendance or the deadline established by the U.S. Department of Education each award year, the University will review and address eligibility as required.

For the Direct Loan program, if a student fails to provide the required documentation by the 30-day deadline, the University will not originate a subsidized loan application for the student.

If, based on corrections, there is an increase for Federal Pell Grant and the student's valid ISIR is received after he/she is no longer enrolled but before the annual Federal Register deadline, the University will pay the applicant the higher award amount.

### Student Notification

The University will notify a student in writing of verification requirements and timelines for submission of necessary documents. Selected students will receive the following:

- Documentation requirements
- Timeline of 30 days to return the required documentation
- Correction procedures (provided during the initial application process)
- Consequences of not returning the documents within the prescribed timelines, which may include cancellation of tuition deferral and request of immediate payment of outstanding tuition charges
- Information in reference to written notification of award changes resulting from verification will be forwarded within 20 days of required adjustments.



### Verification and Crossover Payment Periods

The University will administer crossover payment periods in a way that best benefits the students. If a student is selected for verification in one award year and the payment period crosses over into another award year in which the student is not selected for verification, the University will first request verification documents from the oldest award year. If the student does not complete verification within the required verification deadlines, and the subsequent award year in the crossover period is not selected for verification, the University will use the subsequent award year to award federal financial aid funds. Additionally, if the student is selected for verification for both award years and only documents for the subsequent award year are submitted, the University will proceed with verifying and awarding based on the subsequent award year.

If the University has reason to believe a student is trying to avoid completing the verification requirements and suspects potential fraud, the University will not award federal financial aid funds using the unselected ISIR. Instead, the University will require the student to complete the verification requirements or lose eligibility for the crossover payment period.

### Verification Exclusions

The exclusion described here are applicable only to the affected individual. All other requirements for the verification process still apply to the non-affected parties (i.e. if one parent meets exclusion, the student and the other parent are still required to complete verification requirements).

A selected student will be exempt from the verification requirements based on the following unusual circumstances:

- The student dies,
- The student will not receive federal financial aid for reasons other than failure to complete the verification,
- Graduate students ( as they are only eligible to receive unsubsidized student financial assistance)
- The student was selected for verification after ceasing to be enrolled at the University and all disbursements (including late) were made

Parents of a dependent student will be exempt from verification requirements if any of the following apply:

- Both parents are mentally incapacitated,
- They reside in a country other than the United States and cannot be contacted by normal means, or
- They cannot be located because the student does not have and cannot get their contact information

A spouse of an independent student is exempt from verification requirements if any of the following apply:

- The spouse has died,
- The spouse is mentally incapacitated,
- The spouse resides in a country other than the United States and can't be contacted by normal means, or
- The spouse cannot be located because the student does not have and cannot get contact information

If a student selected for verification dies before the deadline for completing verification and does not complete the verification process, the University will not 1) make any further disbursements on the student's behalf, 2) originate or disburse the student's Direct subsidized Loan, and 3) consider any funds disbursed on an interim basis as an overpayment. The University will document in the student's file the basis for any exclusion, other than the death of a student, using a signed statement from the student.

### Verification Following Natural Disasters

The University will not complete verification for students whose records are lost or destroyed because of a natural disaster. The student's file will be documented accordingly and the Pell Grant disbursements for students affected, will be reported as selected but not verified.

The University will extend the verification document submission deadline to 90 days for those students affected by a natural disaster and whose records were not lost or destroyed. If the required verification documents are not submitted within this deadline and the University can document the reason is due to a natural disaster, the University will not perform verification and will document the student's file accordingly.

# Withdrawal Policy

## Overview

The Withdrawal Policy addresses the process the University has in place to determine when a student has withdrawn from a program of study.

## Policy

### Official Withdrawal

Students who provide official notification of the intent to withdraw from the University may complete the Official Withdrawal form or notify West Student Advisement and Registrar offices to be considered officially withdrawn.

### Withdrawal Date

The withdrawal date for an official withdrawal is the last date of academic attendance or attendance at an academically related activity determined from University attendance records. This date will always be earlier than or equal to the date the student notifies the University of his/her withdrawal

### Date of Determination

The date of determination (DOD) for students who officially withdraw from the University is the latter of the student's withdrawal date or the date of notification. The University will return the amount of federal financial aid funds for which it is responsible no later than 45 days after the date the University determines the student has withdrawn. (See Return of Title IV Policy for further information)

### Rescission of Official Withdrawal

Students who rescind their intent to withdraw must provide an electronic or written statement to the University stating their intent to participate in academically related activities (ARAs) and complete the payment period.

Students may rescind the intent to withdraw by completing the Return After Withdrawal form. Rescissions may be requested up until the time a Return of Title IV (R2T4) calculation has been completed. The student may also submit an electronic or written statement to the University stating his/her intent to return to the University, remain in academic attendance and continue to participate in ARAs through the end of the payment period.

If a student subsequently withdraws after rescinding the intent to withdraw, the withdrawal date is the last date of academic attendance or attendance at an academically related activity determined from University attendance records.

The date of determination (DOD) for students who rescind their intent to withdraw and subsequently withdraw from the University without official notification, is no greater than 15 days after the student's official last date of academic attendance or attendance at an academically related activity determined from University attendance records.

*Note:* Please refer to the last section of this policy for discussion on academic related activities that occur during an institutionally scheduled break.

### Unofficial Withdrawal

Students who do not provide official notification to the University of their intent to withdraw are considered unofficial withdrawals after 14 days of consecutive nonattendance at an ARA.

Students on institutionally scheduled breaks will not have the days of the break count toward the 14 days of consecutive nonattendance at an academically related activity. The following are different types of institutionally scheduled breaks at the University:

- Holidays
- Inclement Weather

- Administrative
- Emergency Closures

### **Withdrawal Date**

The withdrawal date for students who ceases attendance at the University, including a student who does not return from an approved leave of absence (LOA), is the last date of academic attendance or attendance at an academically related activity determined from University attendance records.

In the case of a student who has received an approved LOA, the University will review the student record on or after the originally approved return date. The University review will determine if the student reentered as scheduled, or did not reenter as scheduled and must be withdrawn for the purposes of the Return of Title IV (R2T4) calculation and deferment processing.

### **Date of Determination**

The date of determination (DOD) for students who unofficially withdraw from the University is no greater than 15 days after the official last date of attendance; or when a student fails to return from an approved LOA. The University will return the amount of federal financial funds for which it is responsible, no later than 45 days after the date the University determines the student has withdrawn.

(See Return of Title IV Policy for further information)

Note: Please refer to the last section of this policy for discussion on academic related activities that occur during an institutionally scheduled break.

## **Administrative Withdrawals**

Students who are withdrawn from the University for failure to meet admission, academic, financial, or code of conduct policies are considered administrative withdrawals.

### **Withdrawal Date**

The withdrawal date for students who are administratively withdrawn is the last date of academic attendance or attendance at an academically related activity that occurred prior to the decision to administratively withdraw the student.

### **Date of Determination**

The date of determination (DOD) for students who are administratively withdrawn from the University is the date the University determines the withdrawal. The University will return the amount of federal financial aid for which it is responsible no later than 45 days after the determination of the administrative withdrawal. (See Return of Title IV Policy for further information)

Note: Please refer to the following section of this policy for discussion on academic related activities that occur during an institutionally scheduled break

## **Academic Related Activities that Occur During an Institutionally Schedule Break**

The University does not recognize any ARA that occurs during an institutionally scheduled break as attendance for federal financial aid purposes only.

### **Withdrawal Date**

If a student posts an ARA during an institutionally scheduled break, the University will look for the most recent ARA that occurred prior to the start of the institutionally scheduled break. This date will be used as the withdrawal date for Title IV purposes.

### **Date of Determination**

The DOD for students who post academic related activities during an institutionally scheduled break will be no greater than 15 days after the end date of the institutionally scheduled break.

For example: A student attends class on December 19th. An institutionally scheduled break occurs December 20 – January 4. The student posts an ARA on December 29th, which is during the scheduled break. The DOD is January 19th (the 15th day after the end date of the institutionally scheduled break).

