



SAINT MARY-OF-THE-WOODS COLLEGE

# **Saint Mary-of-the-Woods College**

## **Financial Aid**

### **Policies & Procedures Manual**

## Table of Contents

Saint Mary-of-the-Woods College .....	1
Financial Aid.....	1
Policies & Procedures Manual .....	1
INTRODUCTION.....	5
MISSION STATEMENT .....	5
STATEMENT OF PURPOSE.....	5
FINANCIAL AID REFERENCE DOCUMENTS .....	6
FINANCIAL AID PHILOSOPHY AND OBJECTIVES .....	6
FINANCIAL AID VISION STATEMENT .....	6
PURPOSE .....	6
PHILOSOPHY .....	6
GOALS .....	6
STUDENT CONSUMER INFORMATION.....	7
<b>ROLE OF THE FINANCIAL AID OFFICE</b> .....	7
GENERAL FINANCIAL AID OFFICE ADMINISTRATION.....	8
OFFICE HOURS AND LOCATION .....	8
TELEPHONE .....	8
APPOINTMENTS WITH STAFF .....	8
STAFF MEETINGS .....	8
PERSONNEL POLICIES .....	8
ORGANIZATIONAL CHART.....	9
ACCOMMODATIONS FOR DISABILITIES .....	9
STUDENT RECORDS & CORRESPONDENCE.....	9
TREATMENT OF CORRESPONDENCE .....	9
CONFIDENTIALITY OF STUDENT RECORDS .....	9
RED FLAG POLICY .....	10
SECURITY TASKFORCE.....	10
INFORMATION SHARING & THE FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT.....	10
RECORDS MANAGEMENT & RETENTION OF RECORDS .....	11
INSTITUTIONAL ELIGIBILITY REQUIREMENTS.....	11
PROGRAM ELIGIBILITY.....	12
COSTS AND FEES.....	12
INSTITUTIONAL SCHOLARSHIPS AND GRANTS .....	12
ENROLLMENT REQUIREMENTS.....	13
<b>ADMINISTRATIVE CAPABILITIES</b> .....	13
SEPARATION OF DUTIES .....	13
PROCESSES & PROCEDURES.....	15
ELECTRONIC PROCESSES .....	15
INFORMATION DISCREPANCIES .....	15
REVIEWS AND PROCEEDINGS.....	15
FISCAL OPERATIONS & APPLICATION TO PARTICIPATE .....	15
NATIONAL STUDENT LOAN DATA SYSTEM (NSLDS) .....	16
PROGRAM SPECIFIC REPORT.....	16
RECONCILIATION(S) .....	16

GENERAL TITLE IV STUDENT ELIGIBILITY REQUIREMENTS .....	18
TEACHER LICENSURE .....	18
PREPARATORY COURSEWORK .....	19
REMEDIAL COURSEWORK .....	19
APPLICATION PROCESS .....	20
DEADLINES.....	20
REVIEW OF SUBSEQUENT ISIR'S/ POST SCREENING .....	20
VERIFICATION POLICY & PROCEDURE.....	21
VERIFICATION .....	21
SELECTION OF APPLICANTS TO BE VERIFIED.....	21
VERIFICATION PROCEEDURES & ACCEPTABLE DOCUMENTS .....	22
FORMS .....	22
CONFLICTING & INACCURATE INFORMATION .....	23
VERIFICATION EXCLUSIONS .....	23
PROFESSIONAL JUDGEMENTS (PJ).....	24
PJ AUTHORITY & INDIVIDUALS WHO MAY EXERCISE IT .....	24
CIRCUMSTANCES WHERE PJ MAY BE USED & POSSIBLE ACTION .....	24
REQUEST FOR PJ CONSIDERATION .....	25
UNACCOMPANIED HOMELESS YOUTH.....	25
UEH- UNUSUAL ENROLLMENT HISTORY.....	25
REINSTATEMENT OF ELIGIBILITY.....	27
AWARDING AND DISBURSING AID.....	27
INSTITUTIONAL AWARDS .....	27
SMWC endowment awards: .....	28
<b>SMWC Scholarship policies:</b> .....	28
Study Abroad .....	30
OUTSIDE SCHOLARSHIPS & AGENCY PAYMENTS .....	30
PELL GRANT .....	31
STATE GRANTS .....	31
FSEOG (Federal Supplemental Education Opportunity Grant).....	32
TEACH (Teacher Education Assistance for College and Higher Education) .....	33
FEDERAL WORK-STUDY (FWS).....	33
DIRECT LOANS .....	34
PACKAGING .....	39
Packaging Groups .....	39
Determining Award Amounts .....	39
STUDENT REGISTRATION .....	40
PROVISIONS FOR BOOK AND SUPPLIES .....	41
BUDGETS.....	41
CENSUS DATES.....	42
WITHDRAWING FROM THE COLLEGE .....	43
SUMMER AWARDS .....	45
RETURN OF TITLE IV AID.....	46
Policy.....	46
Procedure.....	46
Process .....	47

OVERAWARDING .....	55
Over-award Resolution.....	55
Resolving an Over-award When the Student is Liable .....	55
Resolving an Over-award When the School is Liable.....	56
SATISFACTORY ACADEMIC PROGRESS (SAP).....	57
Cumulative Grade Point Average.....	57
Term GPA & Completion Rate .....	57
Repeated Coursework .....	57
Incompletes.....	58
Remedial Coursework .....	58
Withdrawals.....	58
Summer Classes .....	58
Transfers.....	58
Change Major .....	58
Dual Degree and adding a Minor .....	59
Warning.....	59
Probation / Appeal.....	59
Graduate Students .....	60
Academic Scholarship Recipients .....	60
AMERICORPS .....	60
<b>VETERAN'S EDUCATIONAL BENEFITS.....</b>	<b>60</b>
VOCATIONAL REHABILITATION .....	61
TREATMENT OF EDUCATIONAL TAX PROVISIONS.....	61
EDUCATIONAL ASSISTANCE PROGRAMS .....	61
CONSORTIUM AGREEMENT.....	61
STUDY ABROAD .....	61
STUDENT COMPLAINTS & FRAUD .....	62
Institutional & Third-Party Fraud.....	62
AUDITS.....	62
Type of Audit .....	62
GAINFUL EMPLOYMENT- EARLY IMPLEMENTATION .....	63
<b>COVID 19 Policy:.....</b>	<b>63</b>

## INTRODUCTION

At Saint Mary of the Woods College, our Financial Aid Office is committed to providing our students with the assistance and guidance needed to meet their financial needs. Federal regulations mandate that institutions have written policies and procedures. Beyond the federal requirement, there are many benefits to having a written document outlining financial aid office policies and procedures: 1) for distribution to appropriate others outside the Financial Aid Office for the purpose of informing and fostering an understanding of the complexity and operation of the Financial Aid Office; 2) for Financial Aid Office staff as a referral guide to assist in maintaining consistency in the problem-solving process; and 3) as an important component of a comprehensive training program.

## MISSION STATEMENT

Saint Mary-of-the-Woods College empowers students to think critically, engage in lifelong leadership, and effect positive change in a spirit of service and social responsibility.

## Value Statement

In our relationships and all that we do, we will demonstrate a commitment to the Sisters of Providence and to these values:

**\*Social Justice**

**\*Spirituality**

**\*Sustainability**

**\*Women's Issues**

## STATEMENT OF PURPOSE

The purpose of this document is to record policies and procedures surrounding the delivery of financial aid at Saint Mary-of-the-Woods College (SMWC).

## THIS MANUAL:

- Sets forth the institution's policies in regard to student aid and describes the procedures which must be taken to implement these policies.
- Provides quick reference to various practices
- Provides orientation and training materials for new personnel.

## **FINANCIAL AID REFERENCE DOCUMENTS**

There are many resource guides which assist the Financial Aid Office staff. These citations are web-based and available to staff members via login & user ID. The documents which are used to determine students' eligibility for financial aid include current regulations published in the Federal Register, Department of Education guides and Dear Colleague letters that impact student aid.

## **FINANCIAL AID PHILOSOPHY AND OBJECTIVES**

Saint Mary-of-the-Woods College evaluates its mission, purpose and objectives. The objectives of the Financial Aid Office revolve around the major functions of the office. Those functions include: 1) awarding and disbursing funds; 2) reporting at the institutional, state and federal levels; 3) providing a satisfying, open door policy to assist students.

## **FINANCIAL AID VISION STATEMENT**

SMWC is committed to the higher education of women and men in the tradition of the liberal arts, with emphasis on preparing students for leadership roles in a diverse and global society.

The vision of the Financial Aid Office is to enhance recruitment and retention of students through support of financial aid programs to assist families with educational expenses.

## **PURPOSE**

The SMWC Financial Aid Office offers scholarship, grant, loan and employment opportunities for qualified, deserving students who can benefit from further education, but who lack financial resources to continue their education. Federal and State grants are distributed according to individual needs as determined by the Free Application for Federal Student Aid (FAFSA).

## **PHILOSOPHY**

We believe that a consistent and equitable approach to the awarding of financial aid will enable students to attend SMWC who would not otherwise have the financial resources to enroll. It therefore; encourages a student population which is culturally, economically, socially and geographically diversified.

The student and the family of a student, when applicable, are expected to make a maximum effort to assist with educational expenses.

## **GOALS**

To provide financial means by which a student can continue his/her education. The financial aid programs at SMWC are administered according to the following principals:

- A financial aid package will be developed and offered to the student based on individual need and circumstances, but without regard to age, sex, race, color, religion, national origin or handicap.
- Maximize resources from governmental, institutional and private funding for students.
- Support the College's mission to recruit and retain students.

- Provide counseling to educate students and families with debt management.
- Provide personalized and quality customer service.
- Manage our office with integrity and fiscal responsibility.

## **STUDENT CONSUMER INFORMATION**

In order to understand the complicated field of Financial Aid, accurate and timely dissemination of information to consumers is vitally important. Several policies have been implemented to ensure appropriate dissemination is achieved.

Information regarding SMWC financial aid programs and policies is distributed through the following published documents:

- The SMWC catalog
- SMWC website - [Student Consumer Information](#)

Additional resources are available at: [www.studentaid.gov](http://www.studentaid.gov).

Other disclosure and reporting requirements are met as follows:

- Annual campus security reports are distributed from the Associate Vice President of Student Affairs and are available throughout the year; these reports are published in the College Catalog.
- Completion or graduation rates are published in the College Catalog and also are found on the SMWC website.

Student complaint process:

If a student has a complaint regarding a member of the Financial Aid staff or any unresolved issue they need to submit a written complaint to the AVP/Director of Financial Aid. If the student has a complaint about the AVP/Director of Financial Aid, the student needs to send a written complaint to the VP of Enrollment Management.

If the student wishes to file a formal complaint to outside agencies they will need to visit our website at [www.smwc.edu](http://www.smwc.edu) for more information regarding the Higher Learning Commission or state agencies.

## **ROLE OF THE FINANCIAL AID OFFICE**

The role of the Financial Aid Office at Saint Mary-of-the-Woods College can be described as follows:

- 1) Assist the Admission's Office in counseling students about their access to education by applying for financial aid.
- 2) Provide effective communication with other offices in order to process applications and disburse funds in a timely manner.
- 3) Verify data reported by the student and/or parent(s)
- 4) Administer the Federal Title IV programs in accordance to the regulations.
- 5) Award financial aid funds in an equitable manner.

- 6) Monitor the academic progress of aid recipients to make certain their progress is satisfactory.
- 7) To publicize the availability of financial aid.

## **GENERAL FINANCIAL AID OFFICE ADMINISTRATION**

### **OFFICE HOURS AND LOCATION**

The Financial Aid Office is located on the 2<sup>nd</sup> floor of the Rooney Center.

The office hours are: Monday – Friday      8:00 a.m. – 5:00 p.m.

The office number is:            (812) 535-5100  
The office fax number is:        (812) 535-5113  
The office email is:              [finaid@smwc.edu](mailto:finaid@smwc.edu)  
The website is:                    [www.smwc.edu](http://www.smwc.edu)

### **TELEPHONE**

Telephone calls are answered in a friendly and professional manner. If the financial aid staff is unable to answer the incoming call, the voice mail option will be offered. Messages are returned within a 48 -72-hour timeframe. Please note: during peak processing times you may expect longer delayed response times.

### **APPOINTMENTS WITH STAFF**

Students and parents who require general information may see a staff member without an appointment. If a student requests an appointment with a staff member, an appointment is arranged.

### **STAFF MEETINGS**

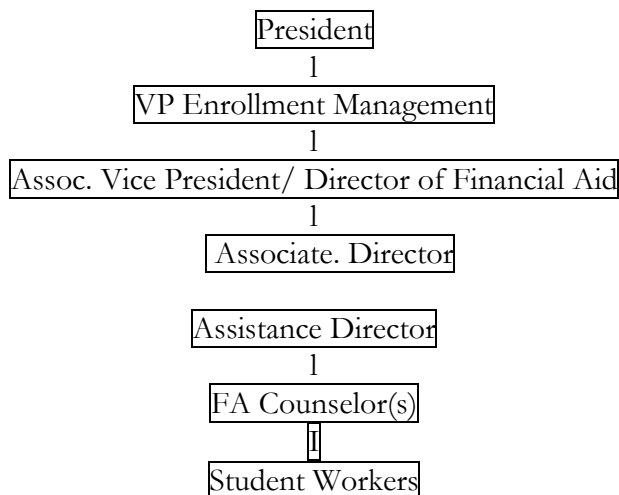
Financial Aid staff meetings are held each Thursday morning or as needed.

### **PERSONNEL POLICIES**

The personnel policies of the faculty and staff (including Financial Aid) are outlined in the SMWC Employee Handbook. Job descriptions are found in the Financial Aid Office and the Human Resource Office.



**Financial Aid Office  
ORGANIZATIONAL CHART**



**ACCOMMODATIONS FOR DISABILITIES**

SMWC will provide reasonable accommodations to an otherwise qualified individual who can perform the essential functions of a position as long as the reasonable accommodation does not impose an undue hardship on SMWC and the person's disability does not pose a direct threat to the health and/or safety of others in the workplace.

All aspects of SMWC's policy on disabilities and reasonable accommodations shall be defined and construed consistent with the ADA and the case law and/or regulations promulgated there under

**STUDENT RECORDS & CORRESPONDENCE**

**TREATMENT OF CORRESPONDENCE**

Correspondence and forms received in the Financial Aid Office are saved electronically and uploaded into the Student Information System (SIS); Campus Nexus.

The Financial Aid counselors are responsible for receiving, distributing and responding to routine correspondence. Responsibilities also include the use of form letters as well as outgoing mail.

Financial aid student workers (FWS) may receive incoming correspondence. Upon receipt, all correspondence will be distributed to the appropriate individual.

**CONFIDENTIALITY OF STUDENT RECORDS**

Saint Mary-of-the-Woods College FERPA policy requires all faculty, staff and student employees that have access to personal student records to abide by FERPA requirements and maintain confidentiality. The Financial Aid staff and Business Office will be the only offices to have access to the student's financial aid records. Student employees are required to comply with the college's FERPA policy and required to sign a confidentiality contract to abide by this policy.

The Financial Aid staff will ask for Personal Identifying Information (PII) from the student or authorized person prior to releasing information. Such identifiers may include, but are not limited to address, major, program type, specific grant information, etc.

### **RED FLAG POLICY**

In an attempt to protect student data from potential risk of identity theft, the Financial Aid Office will only send electronic correspondence pertaining to a student's financial information, grant/scholarship information or other specific information to the students SMWC email account, per Red Flag policies. This account is created and maintained by the SMWC IT Department.

Student documents are stored in the Student Information System (SIS) and the secured FA Shared folder.

In addition, no reports will be shared with other internal or external parties that contains sensitive student information such as; social security or credit card numbers.

### **SECURITY TASKFORCE**

SMWC has created a Security Taskforce to ensure all students, staff and faculty follow processes and procedures to secure data against potential threats. The taskforce is represented by various offices on campus that are stakeholders in protecting college data. The taskforce includes representatives from: Information Technology, Financial Aid, Registrar, Admissions, Student Life, Campus Security, Human Resources, Business Office, Advancement and Legal Counsel.

The financial aid office will follow the "clean desk" guidelines to ensure protection and security of student data.

Periodic risk assessment will be conducted to ensure policies and procedures are being implemented to secure college data.

### **INFORMATION SHARING & THE FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT**

The college maintains a policy that protects the confidentiality of records. No information is released concerning students or employees. All students must sign a FERPA form and return the form to the Office of the Registrar.

NOTE: The college policy on student confidentiality follows the **F**amily **E**ducation **R**ights and **P**rivacy **A**ct of 1974.

Staff who works with employee and student information must maintain strict confidence on all such information both on and off campus. In no instance may information about an employee or student be given over the phone or in writing to a non-campus person or agency without a clearance from the employee or student. Furthermore, data will not be shared with other departments unless they have an educational interest pertaining to the student data.

Employees are required to report changes in the information originally reported on their applications to the Director of Human Resources. Changes such as a new address and/or telephone number, change in marital status, number of dependents or additional education should be reported.

Employees who wish personal information withheld from the College Directory must inform the Public Relations Office during the preparation of the directory. Information in the college Directory is available to all campus personnel and students.

### **Information Sharing & the Family Educational Rights & Privacy Act...cont.....**

- The Financial Aid Office will only disclose student information under a need-to-know basis as viewed by the Executive Director of Financial Aid. Financial Aid student assistants have access to view student records only when it is necessary to perform a job duty.
- If information is requested that is considered confidential, it is best practice for the counselor to contact the Director of Financial Aid for approval or denial of the release. Campus employees are provided information under a need-to-know basis. Please see the Staff Handbook for the policy regarding confidentiality requirements. [www.smwc.edu](http://www.smwc.edu)
- If information is requested about the receipt of a court order, subpoena, or any others requested by law enforcement agencies it would be addressed by the Director of Financial Aid to the President of the college for approval to comply with the request.
- Authorization consent forms are done under a case-by-case basis dependent on the situation. It is only considered valid if, and only if, a student provides a written request for the office to disclose information to a parent or guardian.

### **RECORDS MANAGEMENT & RETENTION OF RECORDS**

The Financial Aid Office is responsible for all financial records management and retention of those records. Other offices that may have responsibility include Admissions, Business Office or the Registrar.

SMWC Financial Aid Office complies with Title IV record retention requirements by:

- Creating a folder or electronic file for every current, enrolled student
- Storing inactive records for (3) years
- Electronic records
- Records on CD's, discs, tapes, or other media

The Financial Aid Office must establish and maintain records as required under the General Provisions and individual program regulations. Once a student has graduated or left the institution their records are maintained for three years prior to being destroyed and/or purged.

The Financial Aid Office is solely responsible for the records management and retention of student financial aid information.

### **INSTITUTIONAL ELIGIBILITY REQUIREMENTS**

Saint Mary-of-the-Woods College is eligible to participate in Title IV programs by meeting the following definition of an eligible institution:

- Institution of higher education

To find documentation that substantiates the college's institutional eligibility, the following documents are available:

- Program Participation Agreement (PPA)
- Eligibility and Certification Approval Report (ECAR)
- Accrediting agency letters
- State authorization or licensure documents

## **PROGRAM ELIGIBILITY**

In order for a program to be considered eligible to receive Title IV funds, it must be a degree-seeking program, or an approved certificate program as listed on the PPA (Program Participation Agreement) and approved with our accrediting agency. This is determined by the Academic Affairs Office and is approved by the President's Cabinet. Once the program is approved by the Cabinet it is then maintained by the Academic Affairs Office and Registrar's Office.

## **COSTS AND FEES**

### **Campus costs for the 2020-2021 academic year**

- Tuition: \$29,950/year (additional class fees may apply)
- Room and Board: \$11,240/year (standard)
- General Fee: \$550/year
- Technology Fee (Freshmen only, one-time fee): \$650 (other students can opt in for the device)
- Orientation Fee (new students only, one-time fee): \$150

### **Woods Online costs for the 2020-2021 academic year**

- Tuition: \$496 per credit hour - All programs (except listed below)
- Tuition: \$585 per credit hour – MTED
- Tuition: \$250 per credit hour – Military rate
- Tuition: \$284 per credit hour – T.E.A.C.H Early Childhood

### **Graduate program costs for the 2020-21 academic year**

- Tuition: \$575 per credit hour (MLD & MHA)
- Tuition: \$750 per credit hour (MAMT)
- Tuition: \$750 per credit hour (MAAT)
- Tuition: \$750 per credit hour (MSN)

## **INSTITUTIONAL SCHOLARSHIPS AND GRANTS**

A complete list and criteria of our Institutional scholarships/grants can be found on our website at: [www.smc.edu](http://www.smc.edu)

## **ENROLLMENT REQUIREMENTS**

### **Campus program**

- 18+ hrs. = overload
- 12-18 hrs. = full time
- 9-11 hrs. =  $\frac{3}{4}$  time
- 6-8 hrs. =  $\frac{1}{2}$  time

### **Woods Online**

- 12 hrs. = full time
- 9-11 hrs. =  $\frac{3}{4}$  time
- 6-8 hrs. =  $\frac{1}{2}$  time

### **Graduate program**

- MLD/MHA
- 6 hrs. per cohort/18 hrs. per semester = full time
- 3 hrs. per cohort/9 hrs. per semester =  $\frac{1}{2}$  time

- MAMT, MAAT, MSN
- 3 hours =  $\frac{1}{2}$  time
- 6 hours = full time

## **ADMINISTRATIVE CAPABILITIES**

Saint Mary-of-the-Woods College Financial Aid Office administers the Title IV programs in accordance with all applicable statutory and regulatory (e.g., accredited institution, PPA and approved by the Higher Learning Commission).

The following responsibilities, with respect to the approval, disbursement, and delivery of Title IV program assistance and the preparation and submission of reports to ED include the following:

- Business Office/Financial Aid
  - Outside scholarship & vendor checks
  - Apply student aid to their account; issue stipend/refund if applicable
  - FISAP
  - Federal work-study report
  - EZ Audit
- Human Resources Office
  - Federal work-study report

The approval, disbursement, and delivery of assistance are primarily done by the Financial Aid Office personnel (e.g., balance Pell, FISAP).

## **SEPARATION OF DUTIES**

Saint Mary-of-the-Woods College Financial Aid Office must administer Title IV programs with adequate checks and balances in its system of internal controls. The functions of authorizing payments and disbursing or delivering Title IV funds must be divided among organizationally

independent individuals so that no office has responsibility for both functions. The Financial Aid office does not have the authorization to directly post awards or payments to the student ledger.

In order to maintain proper Internal Controls, there needs to be a segregation of duties between custody, authorization, and recording. Maintaining strong internal controls is paramount to the College as we need to ensure the accuracy of student accounts.

All team members in the Business Office and Financial Aid must understand the heightened level of scrutiny that comes with handling funds. As such, team members will review and sign off on the Employee Confidentiality form.

#### *PROCESSING BATCHES:*

Any batches/files that contain aid for a financial aid employee cannot be exported or imported by that employee. A different staff must perform the task or the employee must be processed separately from that batch/file.

#### ***BUSINESS OFFICE PROCESS FOR STIPENDS:***

- 1.) All stipends must be system generated. If a manual stipend needs to be created, the employee must receive approval by the Controller and/or the Chief Financial Officer.
- 2.) Each week, Student Accounts will produce the Stipend Schedule based on the CampusNexus Report and send to Financial Aid for Review.
- 3.) All stipends must be approved by the financial aid office prior to processing them.
  - a. Student Accounts will produce the Stipend Schedule based on the CampusNexus Report and send to Financial Aid for Review
  - b. The financial aid office will review the fund source for which the stipend is generated and approve or deny the stipend.
- 4.) The financial aid office will approve/deny the stipend and return the report to the business office via email.
- 5.) Student Accounts will generate checks and print the “Refund Check Register”
- 6.) The Controller or CFO will reconcile the approved list from FA with the Check Register prior to any mailing
- 7.) Accounts Payable will mail the checks based on the approve refund check register

*Note: The business office has a separate internal control in place for the checks themselves to account for every check number (including any voids)*

#### ***SEGREGATION OF DUTIES:***

- ✓ Authority—Financial Aid Staff
  - Will approve all stipends to ensure the proper fund sources are being used and the student is eligible for the stipend.
- ✓ Custody—CFO and/or Controller
  - Is responsible for the integrity of the security/authorization of checks that are issued for processing and the timing of the stipend.
  - Responsible for reconciling Approved Stipend Schedule and Refund Check Register.
  - Responsible for transferring funds to the student refund account.
- ✓ Recording—Student Accounts Coordinator
  - Responsible for processing the Stipend Schedule.

- Responsible for generating stipends and the “Refund Check Schedule” based on FA approvals.

## **PROCESSES & PROCEDURES**

### **ELECTRONIC PROCESSES**

Saint Mary-of-the-Woods College Financial Aid Office participates in the electronic processes identified by ED. All financial aid functions including imports, exports and reports are transmitted electronically using (but not limited to): COD, NSLDS, ScholarTrack, EDconnect, CPS and SAIG mailbox.

### **INFORMATION DISCREPANCIES**

To resolve discrepancies with the information the office receives from different sources with respect to a student’s application for Title IV aid. The office participates in the verification process as well as an independent audit review annually.

The system used to identify discrepancies in information received from different sources with respect to a student’s application for Title IV aid is covered in the conflicting and inaccurate information section of the manual.

The Financial Aid Office and Saint Mary of the Woods College must refer for investigation to the Office of Inspector General (OIG) any credible information indicating that a Title IV aid applicant, school employee, or third party servicer may have engaged in fraud or other criminal misconduct in connection with the aid application.

### **REVIEWS AND PROCEEDINGS**

In order to show administrative capability, Saint Mary-of-the-Woods College must show no evidence of significant problems that affect the institution’s ability to administer a Title IV program as identified in:

- Program reviews conducted by ED, an accrediting agency (HLC), or a state agency (Indiana CHE)
- Audits conducted by ED, an accrediting agency, or a state agency
- Internal/third party audits

Findings made in any criminal, civil, or administrative proceeding

### **FISCAL OPERATIONS & APPLICATION TO PARTICIPATE**

The Financial Aid Office must accurately prepare the Fiscal Operations Report and Application to Participate (FISAP). It is completed in September of each academic year.

The Registrar’s Office is responsible for uploading and updating student enrollment information to the National Student Loan Data System and the Department of ED. Reporting student information such as Federal Pell Grant and FSEOG overpayments is the responsibility of the Financial Aid Office and the Business Office is responsible for Federal Perkins Loan information.

## **NATIONAL STUDENT LOAN DATA SYSTEM (NSLDS)**

Saint Mary-of-the-Woods College Financial Aid Office is required to accurately report student information to the National Student Loan Data System (NSLDS), such as Federal Pell Grant and FSEOG overpayments.

The steps required to complete and verify the accuracy of student enrollment information reported to NSLDS is the responsibility of the Registrar's Office.

## **PROGRAM SPECIFIC REPORT**

Program-specific reporting, such as Enrollment Reporting for the Direct Lending program is the responsibility of the Registrar's Office. Reporting responsibilities for Federal Pell Grants, TEACH and Direct Lending to the Common Origination and Disbursement is maintained by the Office of Financial Aid. Federal Pell Grant information is imported/exported through CampusNexus/EDconnect and is then reported to COD.

## **RECONCILIATION(S)**

Program-specific reporting, such as Enrollment Reporting for the Direct Lending program is the responsibility of the Registrar's Office. Reporting responsibilities for Federal Pell Grants, TEACH and Direct Lending to the Common Origination and Disbursement is maintained by the office of financial aid. Federal Pell Grant information is imported/exported through CampusNexus/EDconnect and is then reported to COD.

## **Monthly Reconciliation(s)**

*Direct loans* – Direct loan reports are sent from COD through the SAIG mailbox to the Financial Aid Office. Those reports are imported into CampusNexus via daily>Financial Aid>Import data COD. A report is created from CampusNexus (COD Disbursement Analysis) and is used to reconcile COD disbursements with CampusNexus disbursements. Amounts disbursed via CampusNexus to the student ledger will be matched against disbursements made via COD.

The report is generated by the Financial Aid Office and any discrepancies will be corrected via CampusNexus or COD by the office of financial aid. This report will be considered “final” and the balanced report will be sent to the Office of Chief Financial Officer (CFO) and AVP/Director of Financial Aid. The final report will be saved in electronic form in the financial aid office for a period of (3) academic years.

The Business Office/Controller cannot draw down funds from G5 in excess of amounts disbursed via CampusNexus and reported on the Electronic Statement of Accounts from COD.

*Federal Pell Grant* – Pell grants for students are originated and disbursed through the CampusNexus software. The Financial Aid staff member will request “year to date”, “Electric Statement of Account” and “Student Reconciliation” reports from COD. Those reports are sent through SAIG and imported into CampusNexus via daily>Financial Aid>Import data COD. A report is created from CampusNexus (COD Disbursement Analysis) and is used to reconcile COD disbursements with CampusNexus disbursements. Amounts disbursed via CampusNexus to the student ledger will be matched against disbursements made via COD.



The report is prepared by the Financial Aid Office and any discrepancies will be corrected via CampusNexus or COD by the Office of Financial Aid. This report will be considered “final” and the balanced report will be sent to the Chief Financial Officer (CFO) and AVP/Director of Financial Aid. The final report will be saved in electronic form in the financial aid office for period of (3) academic years.

The Business Office/Controller cannot draw down funds from G5 in excess of amounts disbursed via CampusNexus and reported on the Electronic Statement of Accounts from COD.

*Federal TEACH grant* – A report is created from CampusNexus (COD Disbursement Analysis) and is used to reconcile COD disbursements with CampusNexus disbursements. Amounts disbursed via CampusNexus to the student ledger will be matched against disbursements made via COD. This report will be considered “final” and the balanced report will be sent to the Chief Financial Officer (CFO) and AVP/Director of Financial Aid. The final report will be saved in electronic form in the Financial Aid Office for period of (3) academic years.

The Business Office/Controller cannot draw down funds from G5 in excess of amounts disbursed via CampusNexus and reported on the Electronic Statement of Accounts from COD.

*Indiana state grants/awards* – The financial aid staff member will run a report from CampusNexus indicating the amount disbursed for each CHE award.

The staff member will reconcile the amount disbursed per the CampusNexus report with the amount disbursed via CHE via ScholarTrack. Any discrepancies will be adjusted to the CampusNexus software and communicated to the business office via batch for posting. This report will be considered “final” and the balanced report will be sent to the Chief Financial Officer (CFO) and AVP/Director of Financial Aid. The final report will be saved in electronic form in the Financial Aid Office for period of (3) academic years.

CHE reconciliations are time sensitive and monitored closely for deadlines.

*Federal Supplemental Educational Opportunity Grant (FSEOG)* – The financial aid staff member will run a report from CampusNexus indicating the amount disbursed from the financial aid office and the amount posted to the student ledger. This report will be considered “final” and the balanced report will be sent to the Chief Financial Officer (CFO) and AVP/Director of Financial Aid. The final report will be saved in electronic form in the Financial Aid Office for period of (3) academic years.

*SMWC Institutional Awards* - The financial aid staff member will run a report from CampusNexus indicating the amount disbursed from the financial aid office and the amount posted to the student ledger. This report will be considered “final” and the balanced report will be sent to the Chief Financial Officer (CFO) and AVP/Director of Financial Aid. The final report will be saved in electronic form in the Financial Aid Office for period of (3) academic years.

*Institutional Endowment Awards* – The CFO or Controller will send the AVP/Director of Financial Aid expense reports regarding endowment funds in July.

A Financial Aid staff member will compare the fund amounts listed in CampusNexus and update the information. The Financial Aid staff will switch out “generic” endowment awards to the named

endowments. The staff member will create a fund source award report from CampusNexus, listing the named awards and send to the Advancement Office.

Throughout the process reports will be sent to the Office of Advancement for balancing.

### **GENERAL TITLE IV STUDENT ELIGIBILITY REQUIREMENTS**

General student eligibility criteria that must be met by the student:

- Be enrolled as a regular student in an eligible program
- Not be enrolled simultaneously in elementary or secondary school
- Have a high school diploma or its recognized equivalent (e.g., a GED);
- Have a passing score on an approved ability-to-benefit test;
- Has completed homeschooling at the secondary level as defined by state law.
- Have a valid Social Security Number with the Social Security Administration, if required
- Be a U.S. citizen or eligible non-citizen
- Be registered with Selective Service, if required
- Not be in default on a Title IV loan or, if in default, have made satisfactory repayment arrangements
- Have not obtained loan amounts that exceed annual or aggregate loan limits made under any Title IV loan program
- Not be liable for an overpayment of a Title IV grant or Federal Perkins Loan or, if liable, have made satisfactory repayment arrangements
- Must be making satisfactory academic progress (SAP)
- Has not been convicted of an offense involving the possession or sale of illegal drugs

Title IV aid can only be used for classes that are required of the degree or certificate. Classes not required for the degree cannot be used to determine enrollment status and cannot be paid with Title IV funds.

In order for a student to be eligible to receive Title IV funds students must file a FAFSA at [www.fafsa.gov](http://www.fafsa.gov). For Indiana students to be considered for state aid, they must file the FAFSA by the required deadline date, April 15th. Failure to comply with this requirement results in a loss of state aid for the academic year. Students must also meet satisfactory academic progress to be eligible for Title IV funds. Please see SAP section of the manual for more detailed information.

### **TEACHER LICENSURE**

A student may receive Federal Work-Study (FWS) as well as Direct and PLUS loans if she/he is enrolled at least half time in required teacher certification coursework, even if it does not lead to a degree or certificate awarded by the school. To qualify, the coursework must be required for elementary or secondary teacher certification or recertification in the state where the student plans to teach and must be offered in credit or clock hours (courses using direct assessment in lieu of credit or clock hours are not eligible). Optional courses that the student elects to take for professional recognition or advancement, and courses recommended by SMWC but not required for certification, do not qualify. Only courses required by the State for licensure will be counted toward the student's enrollment and eligibility for aid.

## **PREPARATORY COURSEWORK**

A student may apply for a Federal Direct loan or PLUS loan for coursework the school has documented is necessary for him to enroll in an eligible program. The courses must be part of an eligible program otherwise offered by the school, though the student does not have to be in that program. If enrolled at least half time in these prerequisite courses, the student is eligible for loans for one consecutive 12-month period (not per program) beginning on the first day of the loan period. If the period of preparatory courses spans more than one academic year, the student may receive multiple loans.

To be eligible for loans under this exception, the student must be taking classes that are a prerequisite for admission. If the student is only taking them to raise his/her GPA in order to be admitted, the student would not qualify.

## **REMEDIAL COURSEWORK**

Remedial coursework prepares a student for study at the postsecondary level (as opposed to preparatory coursework, which prepares a student for a given program), and a student enrolled solely in a remedial program is not considered to be in an eligible program. If acceptance into an eligible program is contingent on completing remedial work, a student cannot be considered enrolled in that program until the student complete the remedial work.

However, if the student is admitted into an eligible program and takes remedial coursework within that program, they can be considered a regular student, even if the student is taking all remedial courses before taking any regular courses. You may count up to one academic year's worth of these courses in his/her enrollment status for federal aid. For the purpose of this limit, that is 30 semester or trimester hours, 45 quarter hours, or 900 clock hours. If the remedial classes are non-credit or reduced credit, you must determine how many credit hours they are worth to count toward the student's enrollment status (see "Enrollment status" section in this chapter).

A remedial course cannot be below the educational level needed for a student to successfully pursue their program after one year in that course. Also, remedial courses must be at least at the high school level, as determined by the state legal authority, your school's accrediting agency, or the state agency recognized for approving public postsecondary vocational education. If that agency determines a remedial class is at the elementary level, the school must abide by that determination, and the class cannot be included for FSA purposes. Nor can FSA funds be used for a remedial course that uses direct assessment of student learning instead of credit or clock hours.

You cannot use non-credit remedial hours to determine a student's enrollment status if the course is part of a program that leads to a high school diploma or its recognized equivalent. A student is never permitted to receive funds for training or for coursework prior to the completion of high school, even if the high school equivalency training is offered at postsecondary schools or is required for the postsecondary program.

Similar to other remedial coursework, a student may receive FSA funds for English as a second language (ESL) courses that are part of a larger eligible program. There are differences though: ESL courses do not count against the one-year limitation on remedial coursework, and they need not be at the secondary school level.

If your school permits a student to enroll in ESL or other remedial courses that don't apply to his degree or certificate, be aware that awarding FSA loans or Pell Grants over a series of semesters for such work can exhaust his eligibility for Pell Grants and/or FSA loans before he completes his program.

Satisfactory Academic Progress guidelines are outlined in the (*Satisfactory Academic Progress*) section of the manual.

## **APPLICATION PROCESS**

In order to be considered for federal/state financial aid at Saint Mary of the Woods College, students must complete the Free Application for Federal Student Aid (FAFSA). This process is used as the basis of our college's financial aid process.

When a FAFSA (ISIR) is received electronically it is imported into CampusNexus and reviewed for verification or conflicting information. If a student is selected for verification, they must complete the appropriate forms prior to aid being disbursed.

## **DEADLINES**

Deadlines for the submission of the Free Application for Federal Student Aid (FAFSA) includes:

- For Title IV funds the deadline is prior to the end of the academic year (June 30th).
- The last date which verification documents can be accepted for the Federal Pell grant is the date established by the Department or 120 days after the last day of the student's enrollment.
- The last date by which federal loans can be processed to ensure compliance with cash management regulations and guaranty agency rules is determined by the student's eligibility for a late or post-withdrawal disbursement.
- Deadlines for submission of all applications and forms (e.g., institutional forms, verification worksheets, etc.) is after three attempts of request for the paperwork have been sent with no reply (typically 4 to 6 weeks after the first letter has been sent).
- Verification deadlines follow the same guidelines for submission of all applications and forms with the three-attempt process. No aid will be disbursed to students in verification status or with conflicting information.
- Indiana state grant program deadlines for FAFSA submission is April 15<sup>th</sup>.

Students are informed of deadlines by institutional electronic notices sent by the Office of Financial Aid, Department of Education and Indiana.

## **REVIEW OF SUBSEQUENT ISIR'S/ POST SCREENING**

The Financial Aid Office must review subsequent Institutional Student Information Records (ISIR) transactions when they arrive to ensure the student/school has submitted the correct information and to verify that the student has not been selected for verification.

The review of subsequent transaction includes:

- Items reviewed include:
  - Verification

- “C” code problems
- Unauthorized student changes
- Social Security/citizenship/Selective Service issues

Once the subsequent ISIR is reviewed and the student is eligible to receive aid they are sent a revised award letter on their student portal that reflects these changes. If the subsequent ISIR is reviewed and the student is ineligible, they are sent a letter notifying them of their ineligibility and this is determined by the college, NSLDS and the state website that regulates these funds accordingly.

## **VERIFICATION POLICY & PROCEDURE**

### **VERIFICATION**

Saint Mary-of-the-Woods College verifies all the Institutional Student Information Reports (ISIR) that are selected for verification by the Department of Education. The financial aid office may review any student aid report that may or may not be selected for verification to clarify any conflicting information or document the information provided on the report. The financial aid office may request certain tax documents, information pertaining to household size or any other required documents to resolve verification or conflicting information.

Once the financial aid office has received all the requested documents, we will compare this information to that provided on the ISIR. If there are no changes, corrections or updates we will proceed with awarding the grants/loans to the student’s financial aid package. If there are discrepancies, we will make the necessary corrections electronically to CPS (Central Processing Service) and when the corrected ISIR is imported it is reviewed. The verified transaction will be used to determine awarding grants/loans to the students Financial Aid packaging.

Students are responsible for supplying the documents required to clear their status. There are deadlines and consequences for not providing documents in a timely manner. Deadlines for verification documents are noted above “Deadlines” section.

If a Financial Aid staff member suspect misreported information or altered documents was received to fraudulently obtain federal funds, the student will be reported to the Office of Inspector General.

**PLEASE NOTE:** No Federal or State grants/loans will be disbursed until all requested documents have been received and the ISIR has been verified.

### **SELECTION OF APPLICANTS TO BE VERIFIED**

To ensure fair and accurate awarding of Title IV funds, federal financial aid regulations require that SMWC complete the verification process on all selected applicants who have been chosen by the Central Processing System (CPS) unless we discover conflicting information. The “census” (cut-off) date for verification is the last day of the current academic year or 120 days after the students last day of enrollment.

- When ISIR records are imported into the student system, the system identifies those applicant records that have been selected for verification by reading comment codes and verification flags. This can occur on the original ISIR transaction or on any subsequent ISIR transaction.
- While SMWC’s selection criteria follows federal regulations of all aid applicants, the financial aid

staff at their discretion can request verification on any student record with conflicting information.

- If, at any time during the verification or file review processes, the financial aid counselor obtains or discovers conflicting information, the counselor has full authority to require whatever documentation necessary to clear up the issue. The aid counselor may decide what documentation is necessary and request that documentation from the student and/or parent.

## **VERIFICATION PROCEEDURES & ACCEPTABLE DOCUMENTS**

If a student is in the verification process, they will receive notification from the financial aid office and are required to respond within 30 days. Failure to comply will result in another request being sent to the applicant, followed by a final request.

Students and/or parents are initially notified of required documentation by email and their student portal. Once documents are received, they are verified and uploaded in the student's electronic file in CampusNexus. If, for any reason, documentation is not received within two weeks the students and/or parents are notified with a second notice and then a final notice. The total allotted time is between four to six weeks.

The counselor pulls the necessary student files to begin the verification and file review process. The counselor then reviews the submitted documentation and updates the verification and file review changes.

If the student application is selected for verification, we must verify major data elements:

- household size,
- Number enrolled in college,
- Adjusted Gross Income (AGI),
- U.S. income tax paid
- Certain untaxed income and benefits (IRA distributions/deductions & payments, untaxed pensions and tax-exempt interest.
- Income earned from work
- Educational credits/deductions
- High school completion status
- Identity/statement of educational purpose

If a student's marital status changes this may require changes to the FAFSA. We will request financial and household information to reflect the most accurate information.

## **FORMS**

All forms (other than application forms) used in the financial aid process at Saint Mary of the Woods College include:

- The financial aid office requires different forms for dependent and independent students. These forms are different, because independent students are only to send the student/spouse documents to us for review, as opposed to the dependent student who would also be required to send their parent/guardian information as well

Documentation and forms used include:

- Verification worksheets
- Federal tax return transcripts or signed copies of the federal tax form and alternative tax documents. If the student/spouse or parents have filed an extension we will require a copy of the approved extension from the IRS, current year W2 forms and a tax returns transcript once they are filed. We will then make any necessary adjustments to the tax information.
- Untaxed income documentation
- Signature requirements – signed by the student and guardian if applicable (dependent vs. independent).

Other documents may be required to resolve conflicting data.

Once the requested verification paperwork is received, the major data elements above are checked for the student, spouse and/or parents. Major data elements reviewed are determined by the verification tracking groups as determined by the Department of Education.

- V1- Standard Verification Group
- V4 – Custom Verification Group
- V5 – Aggregate Verification Group

## **CONFLICTING & INACCURATE INFORMATION**

If there are no changes the verification process is complete. However, if there are discrepancies, the financial aid office will make the necessary corrections electronically to the FAFSA. Once the corrections are made, the counselor can complete the verification process and award the student as aid per their eligibility.

If the verification or file review process result in a change in an applicant's EFC, and if that EFC change results in an award change, the student is sent an email indicating the change and the revised award is posted on the student portal.

## **VERIFICATION EXCLUSIONS**

There are times when we don't need to verify a student's application or certain data elements of the ISIR. All exclusions must be documented. Listed below are situations for verification exclusions:

- Death of the student.
- Not a Title IV aid recipient.
- The applicant is eligible to receive only unsubsidized student financial assistance.
- Applicant is verified by another school. The student completed verification at another school for the same academic year before transferring. A letter from the school stating that it verified the student application and provides the transaction number.
- Post enrollment – the student was selected after ceasing to be enrolled at SMWC.
- Both of the parents (or spouse) are mentally incapacitated.
- Both parents or the custodial parent (spouse) has died.
- The parents (spouse) are residing in a country other than the US and cannot be contacted by normal means.
- The parents (spouse) can't be located because the student does not have and cannot get their contact information.

## **PROFESSIONAL JUDGEMENTS (PJ)**

### **PJ AUTHORITY & INDIVIDUALS WHO MAY EXERCISE IT**

The AVP/Director and financial aid staff have the authority to exercise professional judgment. Professional judgment can be exercised after verification and any conflicting/inconsistent information has been resolved. All Professional Judgments must be approved by the AVP/Director of Financial aid.

Professional judgment would not be used in circumstances where an independent student cannot be made a dependent student, a change cannot be made to the Federal Methodology need analysis formula, post-enrollment costs cannot be added to a student's budget, etc.

The professional judgment process requires students to submit a financial aid reconsideration appeal to the financial aid office that includes:

- A signed, detailed letter describing the reason for the appeal
- Copies of the current tax transcripts (all pages) – required for parents and students (unless previously submitted)
- All W-2's required for parents and students (unless previously submitted) if Professional Judgment pertains to income.
- Completed Verification Worksheet for either dependent or independent students found on our website's Forms section.
- Other documents pertaining to the request.

All students that request a professional judgment must allow up to four weeks after our receipt of all requested documents for their appeal results.

### **CIRCUMSTANCES WHERE PJ MAY BE USED & POSSIBLE ACTION**

The financial aid counselor can exercise discretion in certain areas when a student's family has special or unusual circumstances that are not adequately addressed by the need analysis system, regulations, or legislation. ED does not regulate PJ. The HEA gives authority to the financial aid counselor to exercise PJ in the following areas:

- Dependency status (dependent to independent only)
- Certain data elements used to calculate the EFC
- Cost of attendance
- Satisfactory academic progress
- Denial or reduction of FFEL and Direct Loan eligibility

Some similar circumstances that might trigger the use of PJ at SMWC may include:

- Student's parent or spouse has died
- Extraordinary family medical/dental expenses
- Natural disasters
- Student's parent(s) is attending college in a degree-seeking program at least half-time
- Student's parent has retired
- Since completing the FAFSA, the student or the student's parents have separated or divorced



- Since completing the FAFSA, the student or parent(s) income has been significantly reduced
- The student and/or parent no longer receives untaxed benefits such as Social Security, VA benefits, child support, or other regular source of income
- Parent or student has received a one-time disbursement of funds not available in the future

A student's or parent's data are adjusted by a counselor in the Financial Aid Office. A counselor will review the documentation submitted by the student and/or parent and if a professional judgment is made the counselor will make the necessary adjustments to the aid package and send a revised award letter to the student.

## **REQUEST FOR PJ CONSIDERATION**

Students and parents may submit requests in writing, complete with a signature. Any supporting documentation must be submitted within 2 weeks of its request.

Once the Financial Aid Office receives a PJ request the following actions will be taken:

- Students and parents are informed of the adjustments once the final adjustment has been made via a revised award letter
- The PJ request is routed to the appropriate counselor in the Financial Aid Office.
- When a request is submitted without the required signature(s) or otherwise incomplete a request for the signature will be sent to the student and/or parent and 2 weeks will be allotted for the return of the requested signature(s); the same procedure is followed for request submitted without adequate documentation
- The student or parent is notified once the request is approved or denied via a revised award letter or a letter explaining why the PJ was denied.

## **UNACCOMPANIED HOMELESS YOUTH**

A student is independent if at any time on or after July 1, 2016 (irrespective of whether he is currently homeless or at risk thereof), he is determined to be an unaccompanied youth who is homeless or is self-supporting and at risk of being homeless. This determination can be made by: a school district homeless liaison, the director (or designee) of an emergency shelter or transitional housing program funded by the U.S. Department of Housing and Urban Development, or the director (or designee) of a runaway or homeless youth basic center or transitional living program.

Depending on the district, these authorities *may* choose to make this determination only if the student is receiving their programs' services or if, in the case of a school district homeless liaison, the student is in high school.

## **UEH- UNUSUAL ENROLLMENT HISTORY**

Beginning in the 2013-2014 award years, the U.S. Department of Education added the Unusual Enrollment History (UEH) flag to the Institutional Student Information Record (ISIR). Students who were simultaneously enrolled in multiple schools or Direct Loans, Pell grant or obtained credit balances (refunds) without earning academic credits may lose their eligibility for Title IV aid.

Students that receive the flag on their ISIR will need to provide documentation explaining the student's enrollment pattern and, if applicable, why the student did not earn any academic credit.

Students who have successfully earned academic credit will not be required to provide any documentation.

The students ISIR (Institutional Student Information Record) will flag UEH by a specific comment code and value:

*UEH Flag value is "N"* – no action is necessary as the student’s enrollment pattern does not appear to be unusual.

*UEH Flag value is "2" (comment code 359)* – The institution must review the student’s enrollment and financial aid records to determine if, during the three award year review (academic years: 2016-2017, 2017-2018 & 2018-2019, 2019-2020), the student received a Pell Grant or Direct Loan at SMWC.

- If the student attended SMWC, no action is required unless the institution has reason to believe that the student is one who remains enrolled just long enough to collect student aid funds. In this case, the institution must follow the guidance that is provided for “UEH Flag value 3”.

If the student attended other colleges prior to SMWC, one of the following actions must occur:

- SMWC Financial Aid staff will review the most recent transcripts on file (if applicable) **OR**
- The student must provide an unofficial transcript from the institutions reporting the Pell/loan payment. Please review processes for students that have the UEH Flag value 3.

*UEH Flag value "3" (comment code 360)* – The institution must review the student’s academic records to determine if the student received academic credit at the institution’s the student attended during the three award year period (academic years: 2016-2017, 2017-2018, 2018-2019 & 2019-2020). Using information from the National Student Loan Data System (NSLDS), the institution must identify the institutions where the student received Pell grant or loan funding over the past three years.

- The student must provide an unofficial transcript from the institutions reporting the Pell and/or loan payment.

If SMWC determines that the student earned any academic credit at each of the previously attended institutions during the relevant award years, no further action is required unless SMWC has other reasons to believe that the student is one who enrolls just to receive the credit balance.

If SMWC determines that no academic credits were earned at a previously attended institution the student must provide in writing explaining why the student failed to earn academic credit. The documentation must support 1) the reasons given by the student for the student’s failure to earn academic credit; and 2) that the student did not enroll only to receive credit balance funds.

**Value “3” Eligibility approved:**

If the documentation supports an assertion that the student did not enroll in multiple schools/programs solely to obtain the credit balance payment, then the student is eligible for additional Title IV funds. The following actions will be taken:

- The student will be placed on an academic plan. The student must successfully complete the courses outlined on the plan to remain eligible for Title IV funds.

- The student will receive counseling from the FA staff regarding the implications of the student's enrollment history on Pell Grant Lifetime limits.

**Value "3" Eligibility denied:**

- The student did not earn academic credit at one or more of the prior schools.
- The reviewing school determines that the documentation fails to disprove that the student enrolled in multiple programs solely to obtain the credit balance payment.

The FA office will notify the student regarding the decision to deny eligibility. The student may appeal the decision and will be placed on an academic plan for the semester. No aid will be disbursed until the student successfully completes the courses outlined on the academic plan.

**REINSTATEMENT OF ELIGIBILITY**

- The student may appeal the decision of the FA office in writing via email or letter.
- The student will be placed on an academic plan outlined by their advisor
- The student must successfully complete the semester to reinstate eligibility. The student will be eligible for the Pell grant and campus-based aid in the payment period during which the student regained eligibility. For Direct Loans, eligibility begins with the period of enrollment during which the student regained eligibility.
- If the student does not successfully complete the semester as outlined on the academic plan, Title IV aid for that semester will not be disbursed/or removed from the student's account and the student will be responsible for the outstanding balance owed to SMWC.

The student will not be eligible to register for subsequent semesters until the unpaid balance is resolved and a cash payment plan is in place for the next semester. A new academic plan will be issued, and no Title IV aid will be disbursed until the student has demonstrated success in the outlined classes.

**AWARDING AND DISBURSING AID**

Once Title IV funds have been disbursed, they will come directly to the institution first and pay any institutional charges prior to issuing a stipend to the student. Once the stipend has been issued to the student their balance will be at zero. If there are any charges posted after the stipend has been issued it is the responsibility of the student to pay those charges prior to returning for their next semester. In some cases, a student can use their future financial aid to pay those charges (if they are under \$200), but they must contact the financial aid office for eligibility and give written permission to process the funds. A student will not be allowed to register for their next semester until any remaining balance has been resolved.

**INSTITUTIONAL AWARDS**

Institutional merit/non-merit awards are determined by the financial aid office. Once the award is determined this information is added to the student's financial aid notification that can be viewed on the student portal. A student awards in conjunction with other scholarships/grants/loans cannot exceed the school's Cost of Attendance (COA).

The office of financial aid will review the student's transcript at the end of each term, module or semester to determine if the student is making Satisfactory Academic Progress (SAP) to maintain eligibility for the award.

All institutional awards are applied to tuition only and subject to change with addition of other institutional aid. SMWC awards are only used for courses required to complete the student's degree. Courses added beyond the 120-hour (or program) requirement can be covered by student payment plans. Campus scholarships are for full-time, degree-seeking students. However; if a student is attending their last semester and cannot meet the full-time requirement their scholarship can be prorated.

Students who receive awards in the amount of full tuition and are eligible for other tuition only awards (i.e. state grants) will have their scholarship amount reduced by the amount of the other tuition only award. If a combination of awards exceeds the cost of tuition and/or room/board, the external award will be reduced. No student stipend will be issued as a result of institutional or state grants.

Employee remission will fill the gap of the cost of tuition after other federal, state and outside awards are applied.

SMWC endowment awards:

The Advancement/Development Office provides a list of endowed scholarships and the criteria needed in order to award the scholarship. Requirements for these scholarships are based on donor requests, financial need and academic standards. Once the requirements have been met the endowments are awarded. The financial aid office ensures institutional guidelines for program-specific student eligibility requirements are met. Minimum and maximum award amounts are based on the endowed scholarship amount. Students are notified via student portal if they receive an endowed scholarship and the student is required to send a letter of thanks. The Development Office sends the donor a letter of thanks and also notifies the donor of the recipient.

**SMWC Scholarship policies:**

**Campus:**

- Students must be degree-seeking, full-time students in a campus program, taking campus courses.
- SMWC scholarships are valid for up to (8) semesters and can only be used for courses required for degree completion. Once the student has completed the requirements for their first baccalaureate degree at SMWC, no additional disbursements of SMWC aid will be allowed.
- Students may add minor(s) to their program however; the minors must be completed by the end of their degree or financial aid will not cover them.
- If a student is considered a dual major for his/her degree, all courses for the major(s) must be completed when the student reaches 120 credit hours. If one major is completed and the student has reached 120 hours for degree completion before the other major is completed, federal/state aid will not be disbursed for the subsequent major(s). SMWC aid will only cover dual majors if the second major is declared prior to completing the first major.

- Students must adhere to scholarship guidelines to renew the award for up to (8) semesters.
- If a scholarship requires the student to live on campus and the student moves off campus, the award will be reduced or replaced. Student athletes cannot be commuters without approval of the Athletic Director.
- If a student withdraws from SMWC, their awards are not guaranteed if they choose to return.
- SMWC scholarships cannot be used for study abroad courses. However, students may use federal/state aid (including loans) to cover study abroad courses as long as they are required for their degree. Students are encouraged to plan ahead and apply for one of the SMWC Study Abroad Scholarships.
- Campus scholarships cannot be used for online or graduate courses.
- If the student is in his/her last semester and cannot be full-time status, the SMWC scholarship(s) will be prorated.
- SMWC reserves the right to reduce/replace SMWC awards with other scholarship offers or awards.

**Woods Online:**

- Students must be degree-seeking and at least half-time enrollment status. Award amounts are determined by enrollment status. Woods Online students are not eligible for campus scholarships.
- SMWC scholarships are valid for the duration of the student's program as long as they are at least half-time enrollment status.
- SMWC awards will only pay for courses required for degree completion. Once the student has completed the requirements for their first baccalaureate degree at SMWC, no additional disbursements of SMWC aid will be allowed.
- Students may add minor(s) to their program however; the minors must be completed by the end of their degree or financial aid will not cover them.
- If a student is considered a dual major for his/her degree, all courses for the major(s) must be completed when the student reaches 120 credit hours. If one major is completed and the student has reached 120 hours for degree completion before the other major is completed, federal/state aid will not be disbursed for the subsequent major(s). SMWC aid will only cover dual majors if the second major is declared prior to completing the first major.
- Students must adhere to scholarship guidelines to renew the award.
- If a student withdraws from SMWC, their awards are not guaranteed if they choose to return.
- SMWC scholarships cannot be used for study abroad courses. However, students may use federal/state aid (including loans) to cover study abroad courses as long as they are required for their degree. Students are encouraged to plan ahead and apply for one of the SMWC Study Abroad Scholarships.
- Woods Online scholarships cannot be used for campus or graduate courses.
- SMWC reserves the right to reduce/replace SMWC awards with other scholarship offers or awards.

### **Graduate scholarship policy:**

- Students must be degree-seeking and at least half-time enrollment status. Amounts are determined by enrollment status.
- Students must adhere to scholarship guidelines to renew the award.
- SMWC awards will only pay for course required for degree completion.
- If a student withdraws from SMWC, their awards are not guaranteed if they choose to return.
- SMWC scholarships cannot be used for study abroad courses.
- Graduate scholarships cannot be used for undergraduate campus or Woods Online courses.
- SMWC reserves the right to reduce/replace SMWC awards with other scholarship offers or awards.

### **Study Abroad**

If you are approved to study abroad the Office of Financial Aid will automatically adjust your financial aid budget, need and award to reflect the cost of your study abroad program. SMWC will select two recipients per year to receive the SMWC Study Abroad scholarship. The award will be up to \$5,000 for the semester and will replace other SMWC offers. Aid will be disbursed at SMWC and in most instances then paid directly to the study abroad school in US dollars.

The student must first be approved to study abroad by meeting with Study Abroad Coordinator and Registrar to outline the courses needed. Once the student has received the approved courses, he/she must meet with the financial aid office to determine eligibility. Students will be responsible for all upfront, initial costs such as travel, insurance, etc.

### **Athletic awards/offer:**

For policies regarding athletic awards please refer to the *Department of Intercollegiate Code of Conduct* on our website: [www.smwc.edu](http://www.smwc.edu).

Athletic offers are included in the total amount of SMWC awards offered. Offer amounts are determined by housing status; SMWC reserves the right to reduce or replace offers based on other funds offered or changes to housing status.

### **OUTSIDE SCHOLARSHIPS & AGENCY PAYMENTS**

Students are encouraged to research additional resources to fund their education. If students receive funds from outside scholarships or agencies those funds are typically sent electronically to the business office. If funds are sent electronically, the business office will scan a copy of the transaction to the "Business Office Payments" folder and will notify the financial aid office of the payment. These funds are disbursed to the student's account and added to their packaging. Students are reviewed for over-awarding and over-budgeting. Adjustments to Title IV aid may be required.

If checks are sent by the agencies to the financial aid office the checks are copied and delivered to the Business Office and added to the "Business Office Payments" folder. The scholarships or payments are added to the students packaging and disbursed. The financial aid office will review for over-awarding and over-budgeting.

Copies of the transactions are kept in the folder for a period of (3) academic years.

## **PELL GRANT**

This award is a need-based grant and is calculated by using the student/parent's EFC (Expected Family Contribution) and enrollment status. The EFC is determined using a federal methodology formula developed by Congress from the information provided on the FAFSA (Free Application for Federal Student Aid). Once the Student Aid Report is finalized from verification (if selected) the Pell grant will be added to the student's financial aid notification and portal.

The Pell grant is awarded and disbursed on the most recent, accurate SAR (Student Aid Report) as determined by the Department of Education or SMWC. The amount awarded and disbursed to a student will be adjusted throughout the period of enrollment due to changes in enrollment (adds/drops) or subsequent ISIRS/SARS.

Effective July 1, 2012 according to the Consolidated Appropriations Act, 2012 (Public Law 112-74) students will now be limited to 12 semesters (or its equivalent) up to 600% of lifetime eligibility. The Department of Education will calculate the percentage of Pell each student has received and will determine their remaining eligibility. Once the student reaches their 600% then he/she is no longer eligible to participate in the Pell grant program.

## **STATE GRANTS**

These awards are need based and are calculated by using the student/parent EFC. The state of Indiana requires Indiana students file the FAFSA prior to the April 15th deadline. Failure to meet this deadline will result in a loss of grants. Indiana CHE (Commission of Higher Education) offers to SMWC Students, the Frank O'Bannon Freedom of Choice, 21<sup>st</sup> Century Award, Adult Student grant, Mitch Daniels Early Graduation, Teacher Minority awards and student teaching stipends.

Once the Student Aid Report is finalized from verification (if selected) the awards will be added to the student's financial aid notification and student portal. State grants are tuition grants and in combination with other scholarships, grants and/or loans cannot exceed the schools COA and cannot be refunded to the student for living expenses.

These grants are for Indiana state residents *only* in undergraduate programs. To be eligible for these grants, students MUST:

- be an Indiana resident;
- be a U.S. Citizen or eligible non-citizen
- be a high school graduate or hold a GED
- attend, or plan to attend, an eligible college or university
- be enrolled, or plan to enroll, in a course of study leading to an associate or first bachelor's degree;
- be a full-time student, or plan to enroll as a full-time student. (The state grant defines full-time as at least 12 credit hours per term); and
- Meet all deadlines set forth by the State of Indiana

## New State Grant requirements

- *Frank O'Bannon Awards*
  - Awards are based on Expected Family Contribution levels for all students.
  - Awards are based on credit hour completion. Larger awards are offered to students who complete 30 credit hours per year (on-time awards) and a lesser award for students who complete 24 credit hours per year (full-time awards).
- *Incentives*
  - Academic Honors: is defined, in the student's first year, as a student who graduated from high school with an academic honors or technical honors diploma or, after the student's first year, as a student who has maintained a cumulative grade point average of 3.0 on a 4.0 grading scale or its equivalent. (IC 21-12-1.7-1)
  - Associate Degree: If the student earned an associate degree prior to enrolling in a baccalaureate program.
- *Accelerated Progress:*
  - Accelerated progress is defined as:
    - successfully completing at least 39 credit hours or the equivalent by the end of the student's first academic year; or
    - successfully completing at least 78 credit hours or the equivalent by the end of the student's second academic year.
- *21<sup>st</sup> Century recipients* – are required to successfully complete a minimum of 30 credit hours per academic year and maintain Satisfactory Academic Progress to remain eligible for that program. If a student fails to meet the requirements for the 21<sup>st</sup> Century award the student could be eligible to receive the "Full-time" award. Students who exceed the income requirements (Mean's test) will receive a one-time \$2,500 award. High school class of 2019 and beyond must complete the *College Scholar Program* each year.

Students who received their first Frank O'Bannon award prior to the 2013-14 academic year will be "grandfathered" and are not required to comply with credit hour completion. They will receive the "on-time" awards and they are not eligible for incentives.

## FSEOG (Federal Supplemental Education Opportunity Grant)

This award is based on financial need and enrollment status. Priority for supplemental grants will be given to categories of students listed in the chart below. These students must also receive Pell in the same award year. The FAFSA is the only application necessary. The amount of the FSEOG grant and the ability to receive the grant, is subject to change per academic year depending on the availability of funds.



Federal Supplemental Educational Opportunity Grant		
<b>PRIORITY ONE:</b>		
<b>EFC</b>	<b>RANGE</b>	<b>ENROLLMENT STATUS</b>
All Pell recipients with priority to lowest EFC	\$100 - \$4,000	Must be at least half-time
<b>PRIORITY TWO: Subject to funding</b>		
<b>EFC</b>	<b>RANGE</b>	<b>ENROLLMENT STATUS</b>
Non-Pell recipients	\$100 - \$4,000	Must be at least half-time

### **TEACH (Teacher Education Assistance for College and Higher Education)**

The Teacher Education Assistance for College and Higher Education (TEACH) Grant Program provides up to \$4,000 annual grants to students who plan to become teachers. In exchange for the grant, candidates must agree to serve as full-time teachers at certain schools and within certain high-need fields for at least four academic years within eight years of completing the course of study for which a grant was received. If a grant recipient does not carry out the obligation, the TEACH grant funds he/she received convert to a Direct unsubsidized loan that must be repaid with interest.

Students must adhere to academic standards: minimum cumulative GPA of 3.25. Incoming Freshmen students first term GPA will be based on high school graduation GPA and first college semester cumulative GPA. Transfer student's eligibility will be based on transferring college GPA and first term GPA.

For more information regarding the TEACH grant please visit: [www.teachgrant.ed.gov](http://www.teachgrant.ed.gov)

### **FEDERAL WORK-STUDY (FWS)**

To be eligible for a Federal Work-Study (FWS) job, a student must meet the usual eligibility criteria and must have financial need, that is, his cost of attendance (COA) must be greater than his expected family contribution (EFC). Also, a financial aid administrator may not award FWS employment to a student if that award, when combined with all other resources, would exceed the student's need. However, unlike the other two campus-based programs, the FWS Program does not require priority be given to students who have *exceptional* financial need.

A student can be employed in an FWS job during a period of nonattendance, such as a summer term. He/she must be planning to attend school during the next period of enrollment and must have financial need for that period—his current FWS earnings must be used to cover expenses for it.

FWS students are paid bi-weekly in the form of a check. They may apply this money to their account if they choose to do so however; they are not required.

Selection of FWS students will be based on responses to the FAFSA question regarding FWS interest.

## **DIRECT LOANS**

There are two types of student loans; subsidized and unsubsidized.

### **SUBSIDIZED**

This loan is determined by the student's remaining need (after scholarships/grants). The interest on this loan does not accrue while the student is enrolled as at least a half time status. This loan also has a six-month grace period for repayment after graduation, withdrawing or dropping below a half time status. The amount of the loan is determined by the student grade level and remaining need. The loan in combination with other scholarships/grants/loans cannot exceed the schools COA.

A first-time borrower (defined by the Department of Education) as of July 1, 2013 will be subject to the new limits on subsidized loans. A student in a 4-year undergraduate program may receive subsidized loans for the equivalent of six academic years (150%). Once the student reaches the 150% or the lifetime limit amount the remaining loans will be unsubsidized.

There are special rules for transfer students, students taking preparatory classes and teacher licensure.

Students who transfer programs or schools do not "reset" his/her eligibility. Loans borrowed for the student's previous program count against the student's current limit.

Preparatory coursework for undergraduate studies does not increase a borrower's subsidized loan eligibility. Preparatory coursework for graduate studies is equal to the maximum eligibility for the undergraduate program for which the borrower most recently received a subsidized loan.

New borrower's enrolled in a teacher certification program will have maximum subsidized loan eligibility equal to 150% of the length of the program. The borrower's prior enrollment and subsidized borrowing do not affect the maximum eligibility.

### **UNSUBSIDIZED**

This loan is not determined by the student's financial need. The interest on this loan does accrue when disbursed. The student will have the option to pay the interest while enrolled or can let it accrue and it will be added to the principal balance at repayment. This loan also has a six-month grace period for repayment after graduation, withdrawing or dropping below a half time status. The amount of the loan is determined by the student's grade level, dependency status and remaining packaging need. The loan in combination with other scholarships/grants/loans cannot exceed the schools COA.

#### Entrance Counseling

All first-time borrowers must complete Entrance counseling prior to receiving loan funds. Please visit the website at [www.studentaid.gov](http://www.studentaid.gov) to complete this process prior to completing your MPN (Master Promissory Note). If you have completed Entrance Counseling for another college, please contact the financial aid office.

### MPN (Master Promissory Note)

Student borrowers must complete an MPN (Master Promissory Note) before any funds can be disbursed. You can complete this process by visiting: [www.studentaid.gov](http://www.studentaid.gov). The student's MPN is good for 10 years if it is used as a multi-year note. If you have completed an MPN for another school, please contact the financial aid office.

### PLUS loans

Parent borrowers must complete an application, MPN (Master Promissory Note) and Entrance Counseling (if applicable) by going to: [www.studentaid.gov](http://www.studentaid.gov). If parents are denied the PLUS loan the student can receive additional eligibility in the unsubsidized loan program based on grade level. This process must be completed each year by the parents for the current academic year or if they are requesting an additional loan.

### 150% Subsidized Loan Limit

On May 16, 2013, the Department of Education published interim final regulations in the Federal Register implementing the Moving Ahead for Progress in the 21st Century Act (MAP-21) (Public Law 112-141) that added a new provision to the Direct Loan statutory requirements that limits a first-time borrower's eligibility for Direct Subsidized Loans to a period not to exceed 150 percent of the length of the borrower's educational program ("the 150% limit"). Under certain conditions, the provision also causes first-time borrowers who have exceeded the 150 percent limit to lose the interest subsidy on their Direct Subsidized Loans.

## **DEFINITION OF DISBURSEMENTS & DISBURSEMENT METHODS**

### **POLICY**

A disbursement is defined as the posting of SMWC awards, state grants, Federal loans, Pell, FSEOG, or TEACH proceeds to the student's account. In order for a student to be eligible for a disbursement of such Title IV funds, SMWC must determine if the student has met the required eligibility criteria, is enrolled and has participated in an academic event during the payment period.

### **PROCEDURE**

SMWC follows various processes for determining whether a student should receive a disbursement of Title IV aid which has been awarded and scheduled by the financial aid office.

The first step in the process is to send an origination record to COD for students using Title IV aid. This process is typically completed in the Fall semester for the academic year. However; originations are processed each time a new Title IV award is added to a student's packaging or a new student enrolls mid-year.

Origination records are exported from CampusNexus to COD via EDconnect. Once the file is returned from COD via the SAIG mailbox that file is imported into CampusNexus. Those records are reviewed for rejects and corrections are made to the rejected record.

The next step in the process occurs during the add/drop policy timeframe (day 1-10 of the semester). Financial aid gathers students eligible for disbursements by campus and disbursement date. A batch is created that will work as a file sent to COD and to the business office for disbursements.

The system checks each student against the "disbursement approval criteria" (DAC) to ensure each student is eligible for the award. The students will reject if:

- They are not registered in a current term
- The students packaged aid does not match enrollment. This is critical to ensure the proper Pell amounts are disbursed.
- Not current in classes (meaning, no academic event or attendance has taken place yet).
- Not meeting other DAC related fields such as; GPA, SAP, verification, missing documents, etc.

The students who pass the criteria are batched and exported from CampusNexus to COD via EDconnect.

When the file is returned from COD via SAIG mailbox it is imported into CampusNexus and reviewed for rejects. If rejects are found those issues are resolved. The batch will go through the “auto approve” cycle again to indicate any discrepancies between the packaging and enrollment status. The batch is now ready, and information is sent to the Business Office for posting after the add/drop period. Based on the roster, the Business Office requests the Title IV funds using the U.S. Department of Education’s G5 system after awards have been posted to the student’s account.

The above processes are repeated to disburse aid for students who failed DAC when their issues have been resolved.

If the disbursements posted to the student’s account create a credit balance, the Business Office will pay it to the student immediately, but no later than 14 days after the credit balance is created. All credit balance payments are reviewed by the Financial Aid Office to ensure accuracy. If the student requests the credit balance to be held by SMWC to pay for additional charges, any credit balance amount remaining on the student’s account at the end of academic year will be paid to the student.

## **DISBURSEMENTS DATES & SCHEDULES**

The payment period is set up by predetermined disbursement dates.

Disbursement dates are made by the financial aid office in compliance with federal guidelines. Students are informed of the disbursement schedule via their student portal and are notified by the business office when the disbursement occurs or within 14 days of posting.

Disbursements of federal, state and institutional grants and/or direct loans for campus students can be made (7) days prior to the first date of attendance however; in some cases, the disbursements will not be made until after the drop/add period.

Disbursements for the Woods Online program of federal, state, Institutional grants and Direct loans will be made on the day after the add/drop period. There will be one disbursement of aid per payment period.

Disbursements for Graduate programs will be on the day after the add/drop period.

\*All disbursements are electronically transferred (E.F.T.).

## **LATE DISBURSEMENTS**

Generally, an otherwise eligible student or parent becomes ineligible to receive FSA funds on the date that the student

- For Direct Loan program, is no longer enrolled at the school as at least a half-time student for the period of enrollment for which the loan was intended: or
- For the FSA grant, the student is no longer enrolled at the school for the award year.

However, if certain conditions are met, students must be considered for a disbursement after the date they became ineligible (late disbursements).

## **Notification of Loan Disbursements to Students**

### **Policy**

Saint Mary of the Woods College (SMWC) uses passive confirmation in awarding Title IV funds to students, with the exception of the TEACH Grant and Direct Loans in which affirmative confirmation is used. As such, consistent with 34 CFR § 668.165(a), SMWC issues a notice to students within 30 days of crediting a Federal Direct Loan and Federal TEACH grant to the student's account, advising the student of the disbursement and providing the student with 14 days from the date of the disbursement notice to cancel the applicable disbursement. If the student does not cancel within the applicable period, the student will have accepted the Federal Direct Loan or Federal TEACH grant.

### **Exit Counseling**

#### **Policy**

The regulation 34 CFR § 685.304(b) requires that all student borrowers be counseled on their rights and responsibilities regarding their Federal loans upon "separation" from school. This counseling requirement applies to all student borrowers of Federal Direct Loans, Federal Perkins Loans, and Federal Teach Grants who:

- Drop below half-time status (defined as 6 credit hours for Undergraduate programs and 4 credit hours for Graduate programs)
- Withdraw
- Graduate
- Do not return from a leave of absence
- Do not return for the following enrollment period

Exit counseling will be conducted within 30 days after the borrower separates from SMWC.

### **Procedure**

#### Graduating students

The Registrar's Office will update the student status to "Graduate or Complete" in the Student Information System (SIS). This status will trigger the Exit Counseling letter to be added to the student portal. This does not indicate the exit counseling has been completed.

### Official withdrawals

Students requesting to withdrawal from classes are required to submit their request or intent to the Registrar in writing. Various offices are required to approve the withdrawal for the student to ensure proper counseling is provided. The financial aid office is one of the office's that must approve the withdrawal.

The financial aid office will perform all necessary recalculations and cancel any undisbursed aid. If the student borrower received loan disbursements at any time during their enrollment at SMWC they will be sent Exit Counseling information. When the student's status is updated to "Withdrawal" in the SIS, this will trigger the Exit Counseling letter to be added to the student's portal.

### Unofficial withdrawals

After the end of each grading period, the financial aid Office will run the "Academic History and Advising" report. This report outlines the student's term GPA and cumulative GPA. All students with a zero term GPA (per the report) will be reviewed for recalculation purposes. In addition, students with a cumulative GPA of below 2.0 and will be placed on Financial Aid Probation and will be sent Exit Counseling information (see SAP section).

Students that are not placed on probation, but do not return for subsequent semester will be processed as stated below "Students not returning for subsequent semester".

### Less than half time

The Financial Aid Office will run the "Registered by Credits by Term" report via CampusNexus, Academic reporting after the add/drop date to indicate any student enrolled in less than half-time status. If these student participate in the student loan program and have used federal student loans at SMWC they will be sent Exit Counseling information.

### Not returning for subsequent semester

The Financial Aid Office will run the "Student Status Change" report via CampusNexus, Academic reporting after the add/drop date to indicate any student who did not return for a subsequent semester. This will exclude the summer terms and MLD/MHA/WOL students who choose to not enroll in one module per semester.

If these students participate in the student loan program and have used federal student loans at SMWC they will be sent Exit Counseling information.

### **Code of Conduct**

- If a school participates in an FSA loan program, it must publish and enforce a code of conduct that includes bans on revenue-sharing arrangements with any lender, receiving gifts and staffing assistance.
- Steering borrowers to particular lenders or delaying loan certifications because of the borrower's choice of lender.

- Offers of funds for private loans to students in exchange for providing concessions or promises to the lender for a specific number of FSA loans, a specified loan volume, or a preferred lender arrangement.
- Prohibited consulting/contracting arrangements and receipt of compensation for advisory board service.

## **PACKAGING**

### **Packaging Groups**

The following packaging techniques are used for eligible SMWC student's:

- Campus (commuter and resident)
- Woods Online
- Graduate

All eligible campus students that are Pell eligible will also receive work-study, SEOG and Perkins when applicable.

### **Determining Award Amounts**

#### **Package Construction**

The AVP/Director of Financial Aid ensures packaging policies are being followed and oversees the entire packaging process. The financial aid office ensures that all students are packaged equitably, dependent upon eligibility, and consistently within any Title IV, state, and institutional guidelines.

Some aspects of packaging are manual, and some are electronic.

#### **Packaging Other Educational Resources**

Outside and other educational resources are considered in the packaging process. The Higher Education Act (HEA) and federal/state regulations provide specific packaging guidelines. The HEA lists sources of student aid other than Title IV funds in the definition of other estimated financial aid assistance (EFA). Each resource is considered when packaging independently or with the Title IV aid programs.

#### **Award Package Notification**

A financial aid notification is issued based on the student's estimated cost of attendance and it is the student's responsibility to notify us if they do not wish to receive a specific award. The notification will include the estimated cost of attendance and will provide the student's total need and remaining need amounts. It will also outline what must be done to accept or decline any part of the offered aid.

Financial award notifications will be sent to "new" Campus students via USPS and the student's SMWC portal account. Notifications will be sent to Campus students beginning late October and

revised as needed based on updated information from other departments, outside organizations and/or changes to the FAFSA.

Awards for all returning Campus students will be provided via their SMWC portal only. Awards will be revised as needed based on updated information from other departments, outside organizations and/or changes to the FAFSA.

Financial aid notifications will be sent to all “new” Woods Online and Graduate students via the student’s SMWC portal account. Notifications will be revised as needed based on updated information from other departments, outside organizations and/or changes to the FAFSA.

Financial aid notifications for all returning Woods Online and Graduate students will be sent to their SMWC portal. Award letters will be revised as needed based on updated information from other departments, outside organizations and/or changes to the FAFSA.

### **Packaging Appeals**

All appeals will be forwarded to the VP of Enrollment Management or department directors for review and approval.

The Financial Aid Office addresses student/parent financial appeals prior to or during the awarding process only if the student/parent request for an appeal and we find it to be necessary. Examples of conditions that might trigger an appeal and situations that would warrant an appeal approval or denial might include, but is not limited to: (see Professional Judgment)

- Availability of student aid funds
- Changes in the expected family contribution
- Death of a student’s parent or spouse
- Extraordinary family medical/dental expenses
- Since completing the FAFSA, the student or the student’s parents have separated or divorced

### **Award Packaging Notification Revisions**

Conditions that might trigger an award package revision include:

- Change in enrollment status
- Change(s) made on the FAFSA
- Change made due to an appeal
- Change after the verification process
- Change after R2T4 calculation (student withdraws or fails all classes)
- Outside scholarships or agency payments
- Loss of eligibility for grants and/or loans

### **STUDENT REGISTRATION**

Students are packaged by registered credit hours in the system. The Financial Aid office will determine if the students are “clear” to begin courses based on financial aid status. The list is then sent to the appropriate departments to streamline the student enrollment process.



## **PROVISIONS FOR BOOK AND SUPPLIES**

- Students that are Pell eligible will be cleared by the financial aid office and business office to purchase books and supplies at the SMWC bookstore and have those charges posted to the students account.
- Students may decline to participate in purchasing books at the SMWC Bookstore via book voucher, but it will be the student's responsibility to purchase books and supplies using other vendors. In addition; if books are included in the cost of tuition for the program and the student chooses to purchase books, the student will not be credited for the cost of the purchase.
- If the student is under a Consortium Agreement between two schools and the "home" school is receiving FSA funds they must provide the book voucher. If the "host" school is paying the FSA funds they must provide the book voucher. The student can elect to purchase books from another vendor, but that will be the student's responsibility.

## **BUDGETS**

### **Various Student Populations**

The various student populations the Financial Aid Office constructs budgets includes:

- Campus undergraduates – special budgets are constructed for incoming students that includes one-time fees such as; technology and orientation.
  - Living on campus
  - Living with parents
  - Commuter
- Graduate students
  - Based on program and credit hour enrollment.
- Woods Online
  - Based on student enrollment status
  - Special budgets are constructed for specific billing methods such as;
    - Military
    - IN Teach

A financial aid counselor will manually assign a budget to each student depending on the criteria mentioned in the next section. The majority of this information is obtained from the FAFSA or student enrollment status.

### **How Budgets are Derived & Updated**

Budget amounts are based on average costs and this amount is adjusted by an increase in the Consumer Price Index.

Other methods for deriving costs include looking at the City-Data (Terre Haute) website and Security Administration for cost of living adjustments.

## **Additional Costs**

Additional costs that can be added to the basic student budget for additional documented costs are typically filed under miscellaneous and may include:

- Dependent care expenses
- Loan fees
- Study abroad expenses
- Additional costs for students with disabilities
- Childcare expenses
- Cooperative education program expenses
- Cost of obtaining a first professional license or certificate

Once a budget is complete, it is no longer adjusted without proper documentation such as a Professional Judgment, change in enrollment status or housing situation.

In order for a student budget to be considered for an increase the student must make this request and submit valid information that supports their request. However, a request for an increase doesn't always get approved. The budget increase request must be because of a substantial increase in current expenses (i.e., childcare, dependent care, etc.).

The student's record is annotated and documented to show the additional cost components by a manual process. The Financial Aid counselor will put the necessary document(s) in the students file.

## **Tuition Credits Affecting the Budget**

When a student withdraws or drops classes the Registrar's office may issue a tuition credit depending, on when the withdrawal/drop occurred. The student's budget will be reduced according to the amount of the credit and the student's packaging will be reviewed for over-awarding and over-budgeting. Any necessary adjustments to aid will be made to the students packaging/account. If the tuition credit creates a credit balance on the student account, that credit will be returned to the student loan funds, Pell grants or state grants (with student's permission). No SMWC tuition credit will ever be disbursed directly to the student.

## **CENSUS DATES**

### **Pell Grant**

Students are packaged based on the enrollment status at the time of disbursement. The financial aid office will verify attendance in all courses for the module or term that contributed to the enrollment status. If a student, withdrawals from a course(s) during the term that results in a change of his/her enrollment status, the Pell grant will be recalculated based on the updated enrollment status.

### **Indiana State Grants**

Students are packaged based on full-time enrollment status at the time of disbursement. If a student withdraws from a course(s) during the term that results in a change of his/her enrollment status, a portion of the state grant will be returned for the dropped course. Funds can be retained for course(s) completed.

### **Direct Loans**

Students are packaged based on the enrollment status at the time of disbursement. If a student withdraws from a course(s) during that term that results in a change of his/her enrollment status, the student's Cost of Attendance will be recalculated which could result in a return of federal loan funds.

### **Institutional Aid**

Students are packaged based on the enrollment status at the time of disbursement. If a student withdraws from a course(s) during the add/drop period that results in a change of his/her enrollment status, the institutional aid will be refunded or reduced based on the updated enrollment status.

## **WITHDRAWING FROM THE COLLEGE**

Students who have decided to withdraw should request a withdrawal form from the Office of the Registrar.

Students who withdraw are asked to tell the College why they are leaving. Any responses are treated with confidentiality but may be aggregated as the College examines how better to serve future students.

Please be aware there are separate drop forms and policies for each program at SMWC (campus, Woods Online, graduate programs). Be sure to use the correct drop form and reference the correct drop policy when making decisions on adding or dropping courses.

Additionally, adding or dropping courses may significantly affect your financial aid, please consult with the [Financial Aid Office](#) if you have questions or concerns.

### **Add/Drop Policies Campus Program**

You can ADD a course up until 10% of the scheduled meetings have taken place.

You can DROP a course

- Up to 10% of scheduled meetings to delete the course from your transcript
- Up to 50% of the scheduled meetings to take the grade of "W" on your transcript

Once 50% of the semester has passed, it is no longer possible to drop a course.

### **Tuition Refunds for Dropped Courses**

Once courses are approved during the on-campus or distance registration process, the student is responsible for the tuition for all courses in the project, even if he/she does not complete any work on the courses.

### **Withdrawals and Refunds**

If written notification is received one week before registration, a full refund will be given for all tuition, fees, and room and board charges. If a student withdraws after the semester begins, refunds for room and board charges must be approved by the Director of Student Affairs. Refunds will be

prorated on a weekly basis. Tuition, fees and financial aid will also be prorated.

If a student leaves due to a disciplinary action, refunds may not be approved

If a student taking a Woods Online course intends to drop or add any online courses (8 or 16 weeks in length), this must be done within the first five (5) days of the term.

### **Woods Online and MAAT/MAMT Refund Policy**

Refund Policy for Dropped Courses (8-week delivery format):

<b>If the course is dropped:</b>	<b>This will happen:</b>
<b>1<sup>st</sup> Week:</b> Days 1 –5	Student will receive 100% credit for tuition for the course dropped less a \$10.00 drop fee per course.
<b>After day 5:</b>	Student will receive a 0% credit for the tuition charges. A \$10.00 drop fee will be processed per course

Refund Policy for Dropped Courses (16-week delivery format):

<b>If the course is dropped:</b>	<b>This will happen:</b>
<b>1<sup>st</sup> Week:</b> Days 1 –10	Student will receive 100% credit for tuition for the course dropped less a \$10.00 drop fee per course.
<b>After day 10:</b>	Student will receive a 0% credit for the tuition charges. A \$10.00 drop fee will be processed per course

\*Once courses are finalized for registration, the student is responsible for the tuition for all courses in the semester, even if no work is completed.

\*Days are counted from the start date of the semester, not from the date when the student may have scheduled work to begin on that course.

Refunds will involve only those funds paid by the student, the student's family, or an employer. If the student has financial aid, any refund will be calculated according to the percentage of total expenses paid by the student. The remainder of the refund will be returned to the aid program.

### **MLD/MHA/8-week courses:**

- All modules (classes) for the semester are charged at the start of each semester. Financial Aid will be disbursed based on the “anticipated” enrollment for all three modules. If a student drops a module within the first 5 days:
  - **First module:** - Students will not be charged for the module and financial aid will be placed on “hold” until the student enrolls in the subsequent (2<sup>nd</sup> module). The Financial Aid office cannot disburse funds at this time because the student has not participated in any academic events (modules) yet.

If the student does not return for the subsequent modules the Financial Aid office will cancel financial aid awards for the semester, no aid has been earned.

- **Second module** – Student will be refunded for the second module only. Financial Aid will adjust “credit hours enrolled” to reflect the new enrollment status and cost of attendance. If the student is over awarded the required funds will be returned to the source.

If the student does not return for the third module the Financial Aid office will perform Title IV Return to Lender (R2T4) calculation. The withdrawal date will be the last academic event.

- **Third module (if applicable)** – Student will be refunded for the third module only. Financial Aid will adjust “credit hours enrolled” to reflect the new enrollment status and cost of attendance. If the student is over awarded the required funds will be returned to the source.

\*\* The Financial Aid office will check Satisfactory Academic Progress each module.

### **Military Tuition Assistance (TA)**

Return of Tuition Assistance: Military Tuition Assistance (TA) is awarded to a student under the assumption that the student will attend school for the entire period for which the assistance is awarded. When a student withdraws, the student may no longer be eligible for the full amount of TA funds originally awarded. To comply with the new Department of Defense policy, (SCHOOL'S NAME) will return any unearned TA funds on a prorated basis through at least the 60% portion of the period for which the funds were provided. TA funds are earned proportionally during an enrollment period, with unearned funds returned based upon when a student stops attending.

#### **8- Week Course Withdraw submitted**

Before or during week 1	100 % return
During week 2	75% return
During weeks 3-4	50% return
<b>During week 5</b>	<b>40% return (60% of course is completed)</b>
During weeks 6-8	0% return

#### **16-week Course Withdraw submitted**

Before or during weeks 1-2	100% return
During weeks 3-4	75% return
During weeks 5-8	50% return
<b>During weeks 9-10</b>	<b>40% return (60% of course is completed)</b>
During weeks 11-16	0% return

### **SUMMER AWARDS**

- An Online budget is used in determining summer awards
- Any unused loan is available to the student first
- If a Federal Direct Loan is unavailable the student may be eligible for a private loan.

If FWS is applicable the student's file is noted with her intent to enroll during the subsequent semester when awarded FWS during periods of nonattendance.

## **RETURN OF TITLE IV AID**

### **Policy**

Federal funds are awarded to students under the assumption they will complete the payment period or period of enrollment. When a student withdraws or ceases to attend classes or submit required assignments the institution must determine if the student is eligible for the aid they received or was scheduled to receive.

SMWC does not take attendance however; we monitor student's interaction by their physical presence in class, interaction with their instructor and submission of required assignments. The faculty documents the date(s) of the above activities and that date is used when completing the Return to Title IV calculation.

34 CFR §668.22(c)(1)(iii) an institution that does not require attendance to be taken should use the midpoint of the payment period or period of enrollment when a student is determined to have unofficially withdrawn. However, under 34 CFR §668.22(c)(3)(i) an institution may use a student's last date of attendance at an academically related activity that documents the student's attendance at the activity.

The Registrar's Office notifies the Financial Aid office of any student that has officially or unofficially withdrew from a payment period or period of enrollment. When the Financial Aid office receives this notification, they will begin the recalculation process and determine if any/all funds must be returned to the Title IV program. The Financial Aid office will use the date provided on the student's transcript as the withdraw date and request documentation from the faculty to support that date.

### **Procedure**

The Financial Aid office will receive notification of official withdraws from the Registrar's office via "official withdraw forms".

The official withdraw process begins when the student provides official notification to the school of his or her intent to withdraw. The forms are completed by the Registrar's office and distributed to offices related to the student's program and the Financial Aid office.

An unofficial withdraw occurs when the school determines the student has ceased attendance or interaction. The Financial Aid office will begin the process of determining these students the day after final grades are due to the Registrar. There is a two-step process to determine students who have unofficially withdrawn from the semester. A report will be created from CampusNexus to determine the student's GPA and which class is to be used for the last academic event. The report from CampusNexus will be created by going to: reports>academics records>Academic History and Advising report.

The Financial Aid Office will indicate students on this report who received all "I, F or W" (incompletes, failing grades or withdraws) and complete the Return to Title IV calculation to determine the percentage of aid earned. To determine the student's recent academic event in

CampusNexus, the staff member will go to the “Attendance” portion of CampusNexus and review the class with the recent date that is entered. This date will be used as the most recent academic event.

If funds are required to be returned per the R2T4, the Financial Aid Office will return those funds to the Title IV program and notify the student of the action.

## Process

### Official Withdrawals

- The Registrar’s Office is designated as the primary contact point for students who wish to officially withdraw. If a student notifies a staff or faculty member of their intent to withdraw this is communicated to the Registrar’s office. The student will be contacted by the Registrar’s Office to complete the required withdraw process. They can receive a withdrawal from the Registrar’s Office or online ([www.smwc.edu](http://www.smwc.edu)).
- The Registrar’s office completes the official withdraw form and forwards copies of the withdrawal information to other offices according to the student’s program. The Financial Aid Office will receive the form and begin the R2T4 process.
- The withdrawal date is determined by the date the student actually withdraws per the Registrar’s Office.
- The Financial Aid office calculates the return of Title IV funds using the formula as determined by the Department of Education. The Financial Aid Office uses the form “*Treatment of Title IV funds when a Student Withdraws from a Credit-Hour Program*” as provided on the Central Processing System (CPS) website.
- The Financial Aid Office verifies the “amount disbursed” by reviewing the student’s ledger card. This information is inserted into the required fields on the form.
- The R2T4 calculation is reviewed by another Financial Aid staff member for accuracy. Both the preparer and the reviewer will initial the form.
- If the calculation requires aid to be returned the Financial Aid office will create a file to export to Common Origination & Disbursement to remove or reduce aid from the appropriate Title IV program. The correction file will be returned and imported into the CampusNexus software. The Financial Aid office will create a disbursement file to remove the disbursements from CampusNexus and send that to the Business Office for posting to the student ledger account.
- If the calculation results in returning aid, the Financial Aid office and the Business Office will notify the student of his or her obligation to repay funds by sending a letter and billing statement via US postal mail, email and via the student portal.
- If the calculation requires any earned post-withdrawal disbursement the Financial Aid office will disburse those funds by adding/adjusting the award on CampusNexus and creating a disbursement roster for the Business Office to post to the students account. If applicable, the Business Office will issue a refund check to the student for any credit balance.
- Process takes two to three business days (by federal regulation, the institution has 30 days from the date of the withdrawal or the end of the payment period or period of enrollment to complete the calculation. The school must return the amount of Title IV funds no later than 45 days after the date of determination.

## Unofficial Withdrawals

- The Financial Aid Office will create a report after final grades are due that will indicate student's GPA and classes listed to determine the last academic event.
- The Financial Aid Office will indicate students on this report who received all "I, F or W" (incompletes, failing grades or withdraws) and complete the Return to Title IV calculation to determine the percentage of aid earned.
- The Financial Aid office will use the date on the student's final grade tab to determine the last academic event and request documentation from the instructor to support the date.
- The Financial Aid office calculates the return of Title IV funds using the formula as determined by the Department of Education. The Financial Aid Office uses the form "*Treatment of Title IV funds when a Student Withdraws from a Credit-Hour Program*" as provided on the Central Processing System (CPS) website.
- The Financial Aid Office verifies the "amount disbursed" by reviewing the student's ledger card. This information is inserted into the required fields on the form.
- The R2T4 calculation is reviewed by another Financial Aid staff member for accuracy. Both the preparer and the reviewer will initial the form.
- If the calculation requires aid to be returned the Financial Aid office will create a file to export to Common Origination & Disbursement to remove or reduce aid from the appropriate Title IV program. The correction file will be returned and imported into the CampusNexus software. The Financial Aid office will create a disbursement file to remove the disbursements from CampusNexus and send that to the Business Office for posting to the student ledger account.
- If the calculation results in returning aid, the Financial Aid office and the Business Office will notify the student of his or her obligation to repay funds by sending a letter and billing statement via US postal mail, email and the student portal.
- If the calculation requires any earned post-withdrawal disbursement the Financial Aid office will disburse those funds by adding/adjusting the award on CampusNexus and creating a disbursement roster for the Business Office to post to the students account. If applicable, the Business Office will issue a refund check to the student for any credit balance.
- Process takes two to three business days (by federal regulation, the institution has 30 days from the date of the withdrawal or the end of the payment period or period of enrollment to complete the calculation. The school must return the amount of Title IV funds no later than 45 days after the date of determination.

Situations that would not require our institution to perform a return of Title IV funds calculations would include a student who was awarded Federal Work-Study only or receives no Title IV aid or if a student who drops classes but does not completely withdraw.

If a student completes 60% or more of his/her classes, the Financial Aid Office will still complete the required forms to ensure all aid was earned. The Financial Aid office will also complete required forms if a student does not successfully complete a semester by receiving all failing grades (F), withdraws (W) or has all incompletes (I).

## Withdrawal Date

A withdrawal date is the date in which the student files the proper forms to officially withdraw from their classes or the last date of an academic event (unofficial withdrawal). An unofficial withdraw



occurs when the institution realizes that the student is no longer attending classes and has no intention of returning. The date of withdrawal depends on when the proper forms have been submitted to the Registrar's Office. The faculty will provide the Financial Aid Office with documentation for the last academic event of the most recent class the student received a failing grade. This date will be used to perform the Return to Title IV calculation and indicated on the student's transcript.

A student is allowed to rescind his/her withdrawal notification however, depending on the situation and where the institution is in the process will determine whether or not he/she is accepted back into the program. If a student subsequently leaves anyway, then the withdrawal process is completed as necessary.

SMWC does not take attendance however; some classes and instructors will require (take) attendance. The Financial Aid Office will use the dates according to the Registrar's Office records as withdrawal dates.

## **Administrative Withdrawals**

### **Policy**

Prior to disbursing Federal, State or Institutional funds to a student, SMWC must confirm that the student has begun attendance in a payment period by submitting required assignments. Students that have not triggered attendance or submitted the required assignments within the first 5 days of the period of enrollment for 8-week modules or 10 days for 16-week semesters will be "Administratively Withdrawn".

### **Procedure**

The Financial Aid office will receive notification from the Registrar's Office if the instructor has not received assignments or the student has not attended class within the 10 days of the 16-week semester or 5 days for a 8 week module.

The Financial Aid Office will prepare a Return to Title IV calculation for reporting purposes and remove all pending aid from the CampusNexus system. The Financial Aid office will re-originate loan and Pell awards and export those files via SAIG mailbox to Common Origination & Disbursement to remove pending disbursements.

### **Process**

1. Students are required to attend class or submit a required assignment within the first three (5) days of an 8-week module or (10) days of a 16-week period of enrollment.
2. The Registrar's office will monitor the period of enrollment to ensure the instructor has submitted a "P" indicator identifying that the student has submitted an assignment(s).
3. At the end of the monitoring period the Registrar's Office will provide to the Financial Aid Office the names of students that have not complied with the Administrative Withdrawal policy.
4. The Financial Aid Office will complete the Return to Title IV calculation for reporting purposes.
5. The Financial Aid Office will remove pending awards on the CampusNexus software and create a file to export to Common Origination & Disbursement via SAIG mailbox. This export will remove pending originations and disbursements on the Common Origination & Disbursement records.

6. The corrected file will be returned from Common Origination & Disbursement via the SAIG mailbox and imported into the CampusNexus software.
7. The student's account is noted.

## **Students – Did Not Attend**

### **Policy**

Policy 34 CFR §668.21(a) requires institutions to return all title IV, HEA program funds that are credited to the student's account at the institution or disbursed directly to the student for that payment period or period of enrollment, for Federal Perkins loan, FSEOG, TEACH grant, Federal Pell Grant and Direct Loan funds if the student did not begin attendance.

### **Procedure**

The Financial Aid Office will disburse aid according to the disbursement policies set forth in this manual. If aid is inadvertently disbursed to a student who failed to begin classes all aid will be immediately removed and returned the appropriate program.

### **Process**

1. All aid is disbursed by the Financial Aid Office according to registration requirements set-up in the CampusNexus system.
2. Students are monitored by the instructor and Registrar's office to insure they are attending class and submitting required assignments. Students who fail to attend class or submit required assignments within the first 10 days (for 16-week semesters or 5 days for 8-week modules) of the period of enrollment or payment period will be Administratively Withdrawn and are not entitled to financial aid.
3. If aid is inadvertently disbursed to a student, the aid is immediately removed from CampusNexus by reducing the award and creating a disbursement roster for the Business Office. A file is then created and exported to Common Origination & Disbursement via SAIG mailbox to remove the origination/disbursement from their records.
4. The corrected file will be returned from Common Origination & Disbursement via the SAIG mailbox and imported into the CampusNexus software.
5. The disbursement roster is sent to the Business Office for posting to remove the inadvertent disbursement.
6. The student's account is noted, and the student is contacted regarding the process.

### **Module(s)**

Students who are enrolled in a Credit Hour Program offered in Modules that do not complete all modules during a payment period will be considered a "withdrawal" based on the following questions:

- 1) Did the student cease to attend before completing or fail to begin attendance in a course scheduled to attend?  
If yes, go to question 2  
If no, student is not a withdrawal
- 2) When ceased to attend or failed to begin attendance in a scheduled course, was the student attending other courses?  
If yes, student is not a withdrawal  
If no, go to question 3
- 3) Did the student confirm attendance in a later module in the payment/enrollment period (45-day rule, if applicable)?

If no, student is a withdrawal  
If not a withdrawal, Pell recalculations may apply

Since costs for both modules are posted, aid disbursed and refunds issued on or shortly after the 40<sup>th</sup> day of the beginning of the semester; and the student does not attend classes in the second module we will be required to perform the R2T4 calculation and return aid.

For all programs that contain three or more modules within that payment period the students will be required to complete a “Letter of intent to return” form. For example; if a student attends the first module his/her aid is disbursed. The student does not attend the second module then their aid will be cancelled for that module and they will be required to submit the letter of intent for the third module. If they do not provide us the letter of intent prior to the end of the second module then we will be required to do the calculation and return funds.

### **Leave of Absence (LOA)**

A leave of absence (LOA) is a temporary interruption in a student’s program of study. LOA refers to the specific time period during a program when a student is not in attendance.

### **SMWC Policy for LOA**

A LOA may be requested only in cases of documented circumstances beyond the student’s control and will not be approved for a failure to maintain satisfactory academic progress. A student may request a LOA from their Program Director or the Vice President for Academic Affairs. The length of a LOA may vary given the student’s specific circumstances, but the student must resume classes within one full year from the start of the LOA or he/she will be required to reapply for admission to the College.

A student who requests to take a LOA will be responsible for dropping his/her courses prior to the last date to drop for the term. If the LOA is requested after the drop deadline, the student will be responsible for completing those courses.

A student approved for a LOA will be expected to fulfill all current financial obligations to the College, in accordance with the published refund policies.

**PLEASE NOTE:** SMWC’s Leave of Absence policy does not conform to the federal Title IV student aid requirements. Therefore, a LOA will be treated as a federal withdrawal and is subject to Title IV Return of Funds calculations. In addition, a student on LOA will be reported as withdrawn to the National Student Clearinghouse, triggering the start of the grace period or repayment of student loans.

### **Formula Calculation**

Financial Aid counselors perform the calculations using the Department of Education’s software via the web. A calculation is done for all Title IV students’ withdrawing regardless of status.

When a student has withdrawn this information is conveyed to the Financial Aid Office through proper documentation. Upon receipt, the data is used to calculate whether or not the return of Title IV funds is necessary or not. The period of time the student was enrolled is determined from the beginning to the end.

The counselor that does the calculations will know the amount of Title IV aid disbursed by looking at his/her personal financial aid information and institutional charges are determined by the Business Office.

Disbursements that are pending because of verification or were made as interim disbursements to a student who withdrew prior to completing verification will be cancelled. However, if the money has already been disbursed then a Financial Aid Counselor will remove the awards via COD (Common Origination & Disbursement).

### **Returning Unearned Funds**

After the Return to Title IV (R2T4) calculation is completed, any aid that was not earned by the student will be returned to the aid program by SMWC. Title IV aid not earned will be returned as follows:

- Unsubsidized Direct Loans (other than Direct PLUS loans)
- Subsidized Direct Loans
- Federal Perkins Loans
- Federal Pell grants for which a return is required
- Federal Supplemental Educational Opportunity Grant (FSEOG) for which a return of funds is required
- TEACH Grants for which a return is required
- Iraq and Afghanistan Service Grant, for which a return is required

NOTE: returning funds could result in the student owing SMWC a balance and/or the Department of Education.

The Financial Aid Office (along with the Registrar and Online Director) determine institutional and student shares of unearned aid. For campus students the amounts are prorated however, if a student has attended 60% or more during the enrollment period, they are charged all tuition and fees for that period. For Online students, if they withdraw within the first week, they may be eligible for a 100% refund if it's approved by the Director of Online. After 2/3's of the semester has passed the student may receive up to a 30% refund.

Students are notified if they owe a Title IV grant repayment by the Business Office via an invoice or billing statement.

### **Post-withdrawal Disbursements**

If a recipient of Title IV grant or loan funds withdraws from a school after beginning attendance, the amount of Title IV grant or loan assistance earned by the student must be determined. If the amount disbursed to the student is less than the amount the student earned, and for which the student is otherwise eligible, he or she is eligible to receive a post-withdrawal disbursement of the earned aid that was not received.

If a student or parent is eligible for a post-withdrawal disbursement, they will be notified by the Financial Aid Office. If a refund is applicable, then one will be issued by the Business Office after all tuition and fees on the account have been paid in full.

Priorities for disbursement includes from grants disbursing first, then loan funds. They will be paid to outstanding institutional charges. The Financial Aid office must receive approval from the student to disburse post-withdrawal loan funds, the student must send the confirmation within 14 days of the date of receipt. We must also have written permission to apply those funds to charges from prior years (up to \$200). The Business Office has 14 days to return any post-withdrawal funds to the student or parent.

## **Verification**

The R2T4 calculations impose no additional liability for interim disbursements made to students selected for verification. However, the R2T4 requirements do place limits on interim disbursements that can be made to students selected for verification who have ceased attendance. **A school may not make an interim disbursement to a student after the student has ceased attendance.**

The Department establishes deadlines for the submission of required verification documents that apply to all Title IV programs.

For the Campus-Based Program and Direct Loan Program, a school may establish an institutional verification deadline that may be earlier than the date established by the Department. The institution must include its verification deadlines in the consumer materials it provides to students.

When a school is completing an R2T4 calculation for a student subject to verification the following rules apply:

- A school must offer any post-withdrawal disbursement of loan funds within 30 days of the date the school determined the student withdrew. A school must always return any unearned Title IV funds it is responsible for returning within 45 days of the date the school determined the student withdrew.
- A school must disburse any Title IV grant funds a student is due as part of a post-withdrawal disbursement within 45 days of the date the school determined the student withdrew and disburse any loan funds a student accepts within 180 days of the date the school determined the student withdrew.
- Unless a student subject to verification has provided all required verification documents in time for the school to meet the R2T4 deadlines, the school includes as *Aid disbursed* or *Aid that could have been disbursed* in the R2T4 calculation only those Title IV funds **not** subject to verification.
- If a student who failed to provide all required verification documents in time for the school to meet the R2T4 deadline later provides those documents prior to the applicable verification deadline, the school must perform a new R2T4 calculation based on all of the aid the student qualified for based on the completed verification documents and make the appropriate adjustments

## **When verification is completed before the R2T4 deadlines**

A school must offer any post-withdrawal disbursement of loan funds within 30 days of the date of the school's determination that the student withdrew and return any unearned funds and make a post-withdrawal disbursement of grant funds within 45 days of that date. If a student provides all documents required for verification after withdrawing but before the verification submission deadline, and in time for the institution to meet the 30-day R2T4 deadline, the institution performs

the R2T4 calculation including all Title IV aid for which the student has established eligibility as a result of verification and for which the conditions of a late disbursement had been met prior to the student's loss of eligibility due to withdrawal. (See *Volume 4* and 34 CFR 668.164(j)(2).)

### **When verification is not completed before the R2T4 deadlines**

If a student who has withdrawn does not provide the required documents in time for the school to complete the verification process and meet the R2T4 deadlines noted previously, the institution includes in the R2T4 calculation only the Title IV aid that was not subject to the verification process. For a student who failed to provide all required verification documents, the only aid that may be included in an R2T4 calculation are Direct PLUS Loan funds and Direct Unsubsidized Loan funds (verification is not required for receipt of these funds) for which the conditions of a late disbursement (as discussed under *Title IV Aid that could have been disbursed*, in Chapter 2) were met prior to the student's loss of eligibility due to withdrawal.

If a school has made an interim disbursement to a student who has failed to provide all the documents required for verification in time for the school to meet the 45-day R2T4 deadline, the student has failed to establish eligibility for the Title IV funds affected by verification. Therefore, the institution must return any Title IV funds subject to verification that were disbursed to the student on an interim basis and may not include any of those funds as aid that was or could have been disbursed in the R2T4 calculation.

### **When verification is completed after the R2T4 deadlines**

If, before the verification deadline but after the institution has completed the R2T4 calculation, a student provides all the documentation required for verification, the institution must perform a new R2T4 calculation including, as *Aid that could have been disbursed* all Title IV aid for which the student has established eligibility based upon verification and for which the conditions of a late disbursement have been met prior to the student's loss of eligibility due to withdrawal. If, as a result of verification, the student's eligibility for Federal Pell Grant, Iraq and Afghanistan Service Grant, Federal Supplemental Educational Opportunity Grant (FSEOG), TEACH Grant and Federal Perkins Loan funds has been reduced, only the reduced amount is included in the new R2T4 calculation.

### **Example of R2T4**

Jane Doe started classes in the Online program on January 29, 2010 that will end on May 24, 2010. She enrolled for 6 credit hours that semester. Jane contacted the Registrar's Office on March 11, 2010 to completely withdraw from all her courses. The Return to Lender (R2T4) calculation is as follows:

Jane had \$1482.23 disburse and the other \$1482.23 could have disbursed if she did not withdraw. Jane completed 32.2% of her payment period or period of enrollment. Based on that percentage SMWC would return \$409.10 to Jane's lender. She was not eligible to keep the entire first disbursement and the second disbursement will be cancelled.

## OVERAWARDING

### Over-award Resolution

In the event that an over-award is identified, which typically occurs due to a mistake during the award process, the Financial Aid Office will resolve the issue by seeing if an increase in the student's budget will offset the over-award if applicable. If this does not resolve the problem, there may be a need to reallocate loan funds from subsidized to unsubsidized. If this is not an option; then an attempt to replace the excess aid with institutional funds would be considered. If none of the previously mentioned solutions works, the excess aid will be removed from the students account and they will be notified by an email call and letter.

Measures taken to prevent over-awards include asking all students to notify the FA office of any outside scholarships prior to awarding. The Financial Aid Office monitors student awards to identify over-awards, as does the Business Office.

### Resolving an Over-award When the Student is Liable

Federal Pell Grant awards are not reduced to resolve over-awards of campus-based or Direct Loan funds.

When the school has determined that the student is liable for the over-award the following options to resolve the over-award include:

- Increasing the student's budget (if warranted)
- Decreasing the student's EFC (if warranted; and this is only done if a student appeal's prior to awarding)
- Reducing or canceling awards
- Terminating the student's FWS employment
- Returning loan proceeds that have not been delivered to the student or reallocating loans from subsidized to unsubsidized.

If an over-award cannot be eliminated by one of the aforementioned options, the Business Office will attempt to collect any overpayment (such as a Federal Perkins Loan or FSEOG) from the student. They will also, if need be, refer any FSEOG or Federal Perkins Loan overpayment to ED Collections.

If a student receives an overpayment of a Federal Pell Grant the Financial Aid Office would reduce the Pell and replace it with FSEOG if applicable.

The following actions may be taken to resolve an over-award when the student is liable:

#### **Possible action:**

##### **Step 1**

**If...**the school has not received any of the loan funds

##### **Step 2**

**Then...**it will cancel the original loan and reprocess a second loan for a lesser amount

**OR**

**Possible action**

**If...**the school determines that the student has additional educational expenses, the student's budget will be increased

**Then...**the school will reassess to see if an over-award exists

**OR**

**Possible action**

**If...**the student has received the first disbursement

**But...**the school has not received the second disbursement

**Then...**the school will cancel or adjust the second disbursement

**OR**

**Possible action**

**If...**the student has received both disbursements

**Then...**recalculation may occur (dependent upon the date received)

The student is notified of the action taken when an over-award is identified by sending a revised award letter as well as contacting the student via telephone.

**Resolving an Over-award When the School is Liable**

Students are not liable for Federal Pell Grant, FSEOG, or Federal Perkins Loan overpayments caused by school error and such overpayments cannot be corrected by reducing subsequent disbursements. The resolution of an overpayment that is the school's liability, includes:

- Immediate restoration by the school of the Federal Pell Grant, FSEOG, or Federal Perkins Loan award amounts and disbursements (replace with FSEOG)
- Immediate correction of pending Federal Pell Grant, FSEOG, or Federal Perkins Loan award amounts and disbursements (award would be reduced, and the student would have to repay the school if the funds have already been received)
- Business Office would send the student a statement that would reflect the amount of debt owed to SMWC

Corrections taken to restore incorrectly disbursed Federal Pell Grant, FSEOG, and Federal Perkins loan funds to the appropriate Title IV account are done by importing/exporting through CampusNexus.

A student is notified of debt by mail. A statement is sent which will reflect the debt and the student can arrange a payment plan option with the Business Office without incurring any



penalties.

## **SATISFACTORY ACADEMIC PROGRESS (SAP)**

Students who attend Saint Mary-of-the-Woods College must maintain Satisfactory Academic Progress (SAP) toward the achievement of their degree. While certain scholarships and grant programs have more stringent requirements, this policy sets the minimum standards for evaluating satisfactory academic progress per federal regulations. All student's grades, cumulative GPA and rate of completion will be reviewed for each academic term, module or semester to ensure students are maintaining SAP. Students using financial aid for summer classes will have their SAP reviewed after the summer semester has ended.

SMWC will measure both *quantitative* (time-based) and *qualitative* (grade-based) standards when monitoring SAP.

### **Cumulative Grade Point Average**

Undergraduate, students are required to maintain a minimum cumulative grade point average (*qualitative* standard) of 2.0 as they progress toward the achievement of their degree. The cumulative GPA is calculated on the basis of all credits attempted. A student's GPA is affected by Incompletes, unofficial withdrawals and repetitions.

### **Term GPA & Completion Rate**

All students are reviewed each term, module or semester for SAP. Students are required to complete at least 67% of all hours attempted and maintain a minimum GPA of 2.0 per term, module or semester.

Students are required to complete their degree within a maximum timeframe (*quantitative* standard). Students must complete a minimum of 67% of classes attempted. A full time, undergraduate student must complete their degree at the 150% rate (six years). A student with a half time status will be required to complete their degree within the 150% rate or twelve years.

Attempted credits are defined as the total number of hours in which the student is enrolled on the first day of classes in any term. Incomplete grades must be converted to passing grades within 30 days after the beginning of the next semester to be considered successfully completed. A student's rate of completion is affected by Incompletes, withdrawals, repetitions and transfer credits.

### **Repeated Coursework**

For satisfactory academic progress purposes, each time a course is taken it counts as an attempt; only the first time a passing grade is received is counted as completion. However; the grade assigned for each attempt will replace the current grade and will be calculated in the student's cumulative GPA.

If the course is retaken at SMWC, only the grade earned in the last attempt will be counted in the hours earned toward the quantitative standards for Satisfactory Academic Progress.

- Student may repeat previously passed course once
- May repeat failed course until it is passed as long as they are maintaining SAP standards.

Graduate student's cumulative GPA requirements are listed in the Graduate Catalogs and are based on the program of study.

### **Incompletes**

A student with a valid reason for not finishing course requirements on schedule may be granted one (1) month of additional time by the instructor to complete the course. The student must have a passing grade in the class and 75% of the coursework completed for the class. During the extension, the student receives the grade of "I", denoting an incomplete course. If the course is not completed during the time of the extension, the student will receive the grade as of the last academic event date. A fee for extensions is required.

Woods Online courses are eligible for extensions on a case by case basis and must provide documentation for extenuating circumstances.

Incomplete grades do not affect the student's quantitative or qualitative standards until an official grade is assigned for the course.

### **Remedial Coursework**

Remedial courses are not offered at Saint Mary-of-the-Woods College.

### **Withdrawals**

When a student provides notification of his/her intent to withdraw for some or all courses this is referred to as an "official" withdrawal. Courses are assigned a "W" grade if the official withdrawal occurred prior to the 50% point of the semester. "W" grades do count towards quantitative standards for SAP.

If a student fails to provide notification of his/her intent to withdraw and does not successfully complete all courses the student is considered to be an "unofficial withdrawal". Courses are assigned a failing grade and will count toward quantitative and qualitative standards for SAP.

Failing and/or withdrawing from course(s) will count towards the student's maximum timeframe (as noted above, under Successful Completion Rate).

### **Summer Classes**

Summer classes attended at SMWC will count towards the quantitative and qualitative standards for SAP. Courses taken at other institutions during the summer through consortium agreements will be calculated in the quantitative standards only for SAP purposes. Courses taken at other institutions must be approved by the Advisor and Office of the Registrar.

### **Transfers**

SMWC will use attempted and credits earned from the student's official transcript(s) for courses transferred from other institutions. The transferred classes will be counted toward the quantitative standard for Satisfactory Academic Progress purposes.

### **Change Major**

When a student changes his/her major; the classes completed from the previous major will be transferred to the new major. Completion of the program will be based on the current catalog; therefore, the student may exceed the credit hour requirements for the new program.

Classes from both majors will be used for qualitative and quantitative standards for SAP.

## **Dual Degree and adding a Minor**

Students may add minor(s) to their program however; the minors must be completed by the end of their degree or financial aid will not cover them.

If a student is considered a dual major for his/her degree, all courses for the major(s) must be completed when the student reaches 120 credit hours. If one major is completed and the student has reached 120 hours for degree completion before the other major is completed, federal/state aid will not be disbursed for the subsequent major(s). SMWC aid will only cover dual majors if the second major is declared prior to completing the first major.

Courses for the 2<sup>nd</sup> degree will be used for qualitative and quantitative standards for SAP.

## **Warning**

Students who did not achieve satisfactory academic progress for the most recent completed term, module or semester will be placed on financial aid “warning” for their next period of enrollment. Students placed on warning will have one semester to establish satisfactory academic progress as set forth per Department of Education regulations. Students will have financial aid eligibility for their next period of enrollment.

Students who fall below 67% completion rate must make up the shortage in the next semester in addition to completing 67% of other credit hours attempted. Therefore, students must successfully complete 67% of all attempted credits in the combined term.

Students will be notified of their Financial Aid Warning status via their SMWC email account and postal mail.

## **Probation / Appeal**

Students who fail to establish satisfactory academic progress after being on warning for one semester will have their financial aid eligibility suspended. A student can appeal this decision to have their aid reinstated on the basis of injury or illness of the student, death of a relative, or other special circumstances. The appeal must state the reason(s) for falling below SAP standards and they must include an action plan to correct the issue or situation.

If it is determined, based on the appeal, the student should be able to meet the SAP standards by the end of the subsequent payment period, the student will be placed on probation without an Academic Plan.

If it is determined the student cannot achieve the SAP standards in their next semester the student’s advisor will create an Academic Plan (contract) outlining goals the student must achieve to reach minimum SAP standards. During the “Probation” period the student will not be allowed to withdrawal, fail or have an incomplete course(s). Once the academic plan is created it must be followed because SAP standards will be based on the information provided on the academic plan. The plan cannot be changed unless the student submits an appeal to the financial aid office. It must explain what has happened to make the change necessary and how they will be able to make academic progress.

During the probation period, it is the student’s responsibility to ensure they are monitoring their progress, grades and utilizing resources available to them so they can be a successful student.

If students do not achieve the goals established in the Academic Plan and continue to fail to meet SAP standards, their financial aid will be suspended and the student will be considered a “cash pay” student until they reach the minimum SAP requirements set forth by the Department of Education and SMWC. The student will remain a “cash pay” student until the quantitative and qualitative standards are met.

Courses taken when a student loses Title IV aid eligibility will be counted toward quantitative and qualitative standards for SAP. SAP will be reviewed each term of non-eligibility to determine if Title IV aid can be re-established.

### **Graduate Students**

Must maintain GPA requirements per program. See Graduate Student Handbook.

### **Academic Scholarship Recipients**

Students who receive SMWC Scholarships for attendance at SMWC must maintain the minimum cumulative grade point average as set per the scholarship criteria.

The cumulative GPA for the scholarship will be reviewed at the end of each academic year. Students who fail to meet the minimum requirements set forth for the scholarship will be placed on Scholarship probation for one semester. Students must achieve the minimum scholarship criteria (cumulative grade point average) during their probationary semester. If the student does not achieve the minimum criteria required at the end of the probationary semester, they will be placed on scholarship suspension with an option to appeal. If the appeal is approved and they fail to meet scholarship criteria at the end of the determined suspension period, his/her academic scholarship will not be renewed and will not be reinstated at a later date.

## **AMERICORPS**

If a student has received an AmeriCorps award, the student may use the award as a financial aid resource or a source of repayment for qualified loans. AmeriCorps is not considered a resource or EFA for the subsidized Stafford Loan programs.

Eligible students are identified by documentation received in the Financial Aid Office by the student. Awards are packaged with Title IV campus-based aid depending on the student’s budget and financial need.

## **VETERAN’S EDUCATIONAL BENEFITS**

Students who receive Veteran’s Educational Benefits are required to provide the Financial Aid Office a copy of the DD-214, Certificate of Eligibility and Veterans Education Benefits Worksheet (provided by SMWC).

Students should always notify the Financial Aid Office of ANY changes to their enrollment hours. Students are paid by the VA on a per credit hour basis and failure to report any changes could result in the student repaying VA benefits to the Department of Veterans Affairs.

Students are certified based on the chapter indicated on their required paperwork. All students are certified based on the number of hours provided by the Registrar’s Office at the time of certification. Students MUST request certification and provide the necessary forms for each period of enrollment.

These benefits are used to determine eligibility for the Title IV campus-based and unsubsidized Stafford loan programs and are classified under Federal aid.

The Financial Aid Office does not have access to VA information (monthly housing amounts, benefit amounts, etc) they only have the information pertaining to certification. Students should contact the VA directly pertaining to specific information at [www.va.gov](http://www.va.gov) or 800-827-1000.

### **VOCATIONAL REHABILITATION**

Students who will receive vocational rehabilitation (VR) awards are awarded by the state and are awarded after Pell. The VR award may also be substituted for loans and work awards in the student's package.

### **TREATMENT OF EDUCATIONAL TAX PROVISIONS**

The Economic Growth and Tax Relief Reconciliation Act of 2001 created additional educational tax benefits for students and their families. These benefits have implications for financial aid administrators and these educational tax programs must be reported on the FAFSA as income.

### **EDUCATIONAL ASSISTANCE PROGRAMS**

Online and Graduate students may be eligible to receive a corporate discount if their company participates in the program. The corporate discount takes a percentage off the cost of tuition and is considered part of the student's financial aid award. The employer doesn't send our institution any monetary funds, all discounts are paid for through institutional funds and this program is used as a marketing tool for the college.

### **CONSORTIUM AGREEMENT**

A current student may receive Title IV aid if he/she is taking coursework at another school. If the participating institution enters into a consortium agreement. A consortium agreement specifies that courses from the host institution will transfer to the home institution and that the home institution will process and disburse student aid.

The student must obtain the Consortium Agreement from the Financial Aid Office and get all the necessary signatures. After all signatures have been obtained the student needs to bring the form back to the FA office so the host school can complete their portion.

### **STUDY ABROAD**

If you are approved to study abroad the Office of Financial Aid will automatically adjust your financial aid budget, need and award to reflect the cost of your study abroad program. SMWC will select two recipients per year to receive the SMWC Study Abroad scholarship. The award will be up to \$5,000 for the semester and will replace other SMWC offers. Aid will be disbursed at SMWC and in most instances then paid directly to the study abroad school in US dollars.

The student must first be approved to study abroad by meeting with Study Abroad Coordinator and Registrar to outline the courses needed. Once the student has received the approved courses

he/she must meet with the financial aid office to determine eligibility. Students will be responsible for all upfront, initial costs such as travel, insurance, etc.

## STUDENT COMPLAINTS & FRAUD

If a student is suspected of Title IV or State of Indiana fraud (e.g., falsified documents or forged signatures on an institutional application, documents submitted for verification of information on the application, or loan promissory note) an investigation will be initiated.

### TITLE IV FRAUD:

- To report an issue, suggestion or leave positive feedback you can submit your case online or call the FSA Feedback System.
- <https://Feedback.studentaid.ed.gov>
- 1-844-651-0077
- Monday – Friday - 8:00 a.m. – 8:00 p.m.

### STATE (Indiana):

- To file a complaint or appeal regarding your Indiana grants you can submit your case online or call the Indiana Commission for Higher Education:
- [www.in.gov/CHE/](http://www.in.gov/CHE/)
- 1-888-528-4719
- Monday – Friday - 8:00 a.m. – 5:00 p.m.

### Institutional & Third-Party Fraud

If any employee, third-party servicer, or other agent of the institution acting in a capacity involving the administration or receipt of Title IV funds that may have engaged in fraud or illegal conduct involving the Title IV programs and investigation will be initiated.

Examples of fraud include the business knowingly authorizes a Title IV refund check to an ineligible student or the school's third-party servicer signs a student's Federal Perkins Loan promissory note.

The Financial Aid Office identifies suspected institutional fraud or third-party fraud by implementing a check and balances system between their department and the Business Office.

Prior to reporting suspected fraud to the OIG, there would be a thorough investigation by the institution to ensure all the facts have been gathered and analyzed prior to making the referral.

## AUDITS

### Type of Audit

Saint Mary of the Woods College undergoes an annual audit (A-133) each summer which is conducted by an individual who is sufficiently independent of the school. All audits, along with an audited financial statement, must be submitted to the Department of Education in a timely manner in accordance with Department of Education requirements. All financial statements that are submitted must cover the last complete fiscal year. Accordingly, audits are submitted on-line via ED's eZAudit Web site at [www.ezaudit.ed.gov](http://www.ezaudit.ed.gov).

The Financial Aid Office receives notices of requested records via

e-mail and the Business Office and the Financial Aid Office are responsible for coordinating with the auditor and providing those records. The records are assessed and provided to the auditor by manually retrieving paper and/or electronic files.

Once an audit has been completed, the auditor discusses the outcomes while on-campus and again in August during a summary finding. If there are any audit findings that require a change to be made the corrections are made as necessary and in a timely manner.

### **GAINFUL EMPLOYMENT- EARLY IMPLEMENTATION**

On July 1, 2019 the Department of Education published the final rule rescinding the Department's Gainful Employment (GE) regulation (2014 Rule). SMWC has made the decision to rescind the GE requirements prior to the July 1, 2020 implementation. In doing so, this will relieve the unnecessary administrative burden placed on the financial aid office to report students in GE programs to NSLDS.

The President, Cabinet members and the Associate Vice President for Financial Aid/Admissions met on July 31, 2019 and decided based on the number of students reported for the school's GE programs and the cohort size it was in the best interest of SMWC to proceed with rescinding the GE regulatory provisions.

Effective immediately:

- SMWC will not report GE data for the 2018-19 year to the National Student Loan Data System (NSLDS)
- SMWC will not display the GE Disclosure Template or link in promotional materials to prospective students.
- SMWC will not display the GE Disclosure Template or link on our website.
- SMWC will comply with the Program Participation Agreement (PPA) certification requirements for GE programs under **668.414** and

Otherwise comply with any of the other regulatory requirements under **668** Subpart Q and R.

### **COVID 19 Policy:**

***Regulatory Citation:*** *March 5, 2020 Electronic Announcement; March 5, 2020 Electronic Announcement COVID-19 FAQ; April 3, 2020 Electronic Announcement, April 21, 2020 Electronic Announcement; May 15, 2020 Electronic Announcement*

### **PURPOSE:**

This policy and procedure addresses Saint Mary-of-the-Woods College's adjustments to the normal policies and procedures listed below during the COVID-19 pandemic.

### **POLICY:**

#### **Distance Education**

In accordance with guidance received from the US Department of Education (ED), Saint Mary-of-the-Woods College has switched to online and electronic forms of instruction only for the spring 2020 and summer 2020 semesters. (*March 5, 2020 EA*)

Saint Mary-of-the-Woods College will allow students attending foreign schools, who were in-country and had started classes for the spring 2020 semester prior to being called home, to complete classes via distance education if the foreign institution provides this format of study. (*March 20, 2020 FAQ*).

## **R2T4**

### **Official withdrawals**

The Financial Aid Office will generate a report of all of the students who officially withdrew during Spring 2020 and review our records to get a list of those students who had aid returned. We will then review the withdrawal information to see if the students indicated a reason that was not related to COVID-19.

If the students did not indicate a reason for their withdrawal, then the Financial Aid Office will contact the student by sending a letter to their campus email to ask the student if their withdrawal was caused by circumstances related to the COVID-19 national emergency. If we receive a positive reply from the student, we will adjust the student's award package and re-disburse Title IV funds. (*May 15, 2020 EA*).

*Note: We switched to online instruction only on March 18, 2020. March 30th was the benchmark for earning 60% of the aid for the term and at that point, the students are allowed to keep their aid. Therefore, nearly all of the Return of Funds for official withdrawals took place prior to when we sent students home to finish the semester online.*

### **Unofficial withdrawals (All F)**

We will contact instructors as part of our normal procedure for any student who has a Last Date of Attendance in CampusNexus beyond the 60% date of the Spring 2020 semester. If a professor confirms that the student participated beyond the 60% date, then the professor's response will be documented in the student's file and the Return of Funds calculation will not be performed.

**Enrolled in an on-campus program:** For students who did not participate beyond the 60% date, the Return of Funds calculations will be performed on COD but no adjustments will be made to the students' aid packages on CampusNexus and the students will retain their aid. We will keep documentation of the amount which would normally have been returned for later reporting purposes. (*May 15, 2020 EA*).

**Enrolled in a distance-only program:** If a student was enrolled in a distance-only program when they failed to complete any courses during the Spring 2020 semester, the Financial Aid Office will contact the student by sending a letter to their campus email to ask the student if their academic issue was caused by circumstances related to the COVID-19 national emergency. If we receive a positive reply from the student, the Return of Funds calculations will be performed on COD but no adjustments will be made to the students' aid packages on CampusNexus and the students will retain their aid. We will keep documentation of the amount which would normally have been returned for later reporting purposes. (*May 15, 2020 EA*).

Per guidance from NASFAA AskRegs team, since we have planned our Summer 2020 and Fall 2020 terms differently from the beginning of the term, if all goes as planned, then we do not have a campus disruption. For Summer 2020 and Fall 2020 unofficial withdrawals (All F students), the R2T4 flexibility still applies if we have an attestation from the student. Therefore, we will contact each student who did not participate beyond the 60% date to determine if their failure to earn



credits was related to COVID-19. If we receive an attestation from the student, the return calculation will be performed and documented, but aid will not be returned. *(May 15, 2020 EA)*.

### **Satisfactory Academic Progress (SAP)**

SMWC Financial Aid Office will continue to count courses from the 2020 spring and summer terms as attempted hours in the SAP calculation. Students who fall below SAP standards will not need to submit an appeal. Student's will be placed in a SAP WARNING status and they will be sent an e-mail explaining that they did not meet SAP criteria. *(March 5, 2020 EA)*.

### **Verification**

Verification documentation, including institutional financial aid forms, must still be submitted pursuant to current verification policies with the following exception: SMWC will waive the notary requirement for the 1920 academic year between March 16, 2020 and July 31, 2020. *(April 3, 2020 EA)*.

### **Citizenship**

Citizenship documentation must still be submitted pursuant to current SMWC policies with the following exception: SMWC will waive the notary requirement for the summer 2020 term between March 16, 2020 and July 31, 2020. *(Institutional policy)*.

### **Federal Work Study Program (FWS)**

Following guidance received from ED, the College will pay students who receive Federal Work Study for the hours they would have been expected to work as reported by their supervisor for the spring 2020 semester up to the dollar amount of the FWS allotment in their award packages. *(March 5, 2020 EA)*

This manual was revised on 02/04/2021