



# FINLANDIA UNIVERSITY

## POLICY AND PROCEDURE MANUAL-STUDENT FINANCIAL SERVICES



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## 1. INTRODUCTION

### **Statement of Purpose**

The financial aid policies and procedures manual has been developed to serve as a guide for the staff. With continuously changing in Title IV financial regulations, Finlandia University (the “University” here on) must keep administration of Title IV programs in compliance with the federal regulations and keep the financial aid policy and procedures manual up to date. The financial aid staff is expected to administer all financial aid programs within the regulations that govern them. In the absence of policy or procedure that addresses a given issue, the Financial Aid department is expected to follow federal guidance and use professional judgment based upon the intent of all financial aid programs and Office practices.

### **Financial Aid Reference Documents**

Various sources for new information pertaining to financial aid regulations, laws, and Department of Education (ED) policy guidance are continuously used during the process of forming the manual. The Financial Aid Policies and Procedures Manual will be evaluated and updated every year.

The Financial Aid department utilizes several documents and electronic methods to keep up with new regulations, laws, and ED policy guidance that might impact the department’s policies and procedures. The department refers to documents and publications such as:

- Federal Student Aid Handbook
- Dear Colleague/Partner Letters
- EFC Formula Guide
- Policy Bulletins
- U.S. Department of Education Audit Guide
- Federal Registers
- Title IV Regulations and Updates
- Higher Education as Amended
- Electronic Announcements (IFAP Letters)
- Newsletters from professional associations (such as NASFAA and state associations)

## 2. PHILOSOPHY AND POLICIES

## **Mission of the University**

Finlandia University is a learning community dedicated to academic excellence, spiritual growth and service.

## **The Philosophy of the Financial Aid Department**

While the primary responsibility of paying for College lies with the student and the student's family, the Financial Aid department offers a variety of aid, such as grants, loans, scholarships, and work study to assist as many qualified students as possible.

The Financial Aid department is responsible for administering scholarships, grants, and loans, which are vital in supporting students to achieve their educational goals. Financial Aid offices are located in:

➤ Mannerheim Building 2<sup>nd</sup> Floor

The operation hours are 8:30 AM – 4:00 PM, Monday through Friday.

Contact Information is as Follows:

Financial Aid: 906-487-7240 or 906-487-7261

Student Account: 906-487-7210

Mailing Address: Finlandia University, Office of Financial Aid, 601 Quincy Street, Hancock, MI 49930.

## **Equal Opportunity Statement**

Finlandia University has filed with the Federal Government an Assurance of Compliance with all requirements imposed by or pursuant to Title VI of the Civil Rights Act of 1964 and the Regulations issued there under, to the end that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity sponsored by this institution. It is also the policy of Finlandia University to be in accordance with Title IX of the Education Amendments of 1972 which provides that "no person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any educational program or activity receiving Federal financial assistance."

### 3. INSTITUTIONAL ELIGIBILITY

#### **Accreditation**

Finlandia University is accredited by the Higher Learning Commission.

Finlandia University is authorized by the State of Michigan, by virtue of its articles of incorporation, to operate an institution of higher learning granting degrees of any nature. The University is listed in the State of Michigan directory of approved institutions of higher learning.

The University has been approved by Michigan to participate in the National Council for State Authorization Reciprocity Agreements. NC-SARA is a voluntary, regional approach to state oversight of postsecondary distance education. ([nc-sara.org](http://nc-sara.org))

PTA Accreditation:

CAPTE (Commission on Accreditation in Physical Therapy Education)

BSN Accreditation:

The Michigan State Board of Nursing of the Michigan Department of Licensing and Regulatory Affairs

Commission on Collegiate Nursing Education\

Information on accreditation can be found in the President's Office

The Director of Student Financial Services is responsible for completing and submitting the Eligibility & Certification Approval Report (ECAR) and the Program Participation Agreement (PPA) to the Department of Education. A copy of the E-App is housed in the Financial Aid department with supporting documents attached. Once approved, a copy will remain in the Financial Aid department.

#### **Responsibilities of Institutional Offices**

The Financial Aid department works with various offices with respect to the approval and the disbursement of Title IV funds and the preparation and submission of reports to the Department of Education (ED).

## **General Title IV Student Eligibility Requirements**

To be Eligible to receive Federal Student Aid, the student must:

- Be enrolled or accepted for enrollment as a regular student in an eligible degree or certificate program.
- Be a U.S. citizen or eligible non-citizen
- Have a valid Social Security Number, if required
- Qualify to obtain a college or career school education, either by having a high school diploma or General Educational Development (GED) certificate, or by completing a high school education in a homeschool setting approved under state law.
- Not be enrolled simultaneously in elementary or secondary school
- Be registered with Selective Service, for a male between the ages of 18 and 25. (Not required in 2022-23)
- Not be in default on a Title IV loan or, if in default, have made satisfactory repayment arrangements
- Maintain satisfactory academic progress (SAP) while attending college.
- Be enrolled at least halftime to receive assistance from the Direct Loan Program.
- Completed a FAFSA and the school must have a current ISIR to start the initial eligibility process.
- Signs certifying statement on the FAFSA stating that the student:
  1. Is not in default on a federal student loan
  2. Does not owe a refund on a federal grant
  3. Will use federal student aid only for education purposes
- Not have been convicted of an offense involving the possession or sale of illegal drugs that occurred while the student was enrolled and receiving Title IV aid. (Not required in 2022-23)
- Not have property which is subject to a judgment lien for a debt owed to the U.S. or, if subject to a judgment lien, have made satisfactory repayment arrangements.

- Have not obtained loan amounts that exceed annual or aggregate loan limits made under any Title IV loan program.

## **Accommodations for Disabilities**

**See Anthony and Luke for verbiage**

## **Consumer Information**

The Higher Education Act of 1965 (HEA), as amended by the Higher Education Opportunity Act of 2008 (HEOA), includes many disclosures and reporting requirements. A disclosure requirement is information that a post-secondary education institution is required to distribute or make available to another party, such as students or employees. A reporting requirement is information submitted to the US Department of Education or other agencies.

The University is required by law to make available to enrolled students, prospective students, and their parents' certain information about its operations. Such information pertains to: (1) general institutional operation, (2) financial aid, (3) general completion and graduation rates, and (4) annual security report.

To meet the requirement, information for the University is provided below. Web site address is specified for all information items, as well as telephone numbers and e-mail addresses of the college officials who can respond to questions or information requests in their specific areas. If requested, the University can provide hard copies of any of the information displayed on the website. **(Place link here)**

As required by Section 22 of the Drug Free Schools and Communities Act of 1989 (Public Law 101-226) and in recognition of this institution's responsibility to serve as a beneficial influence on its students, its employees, and the community at large, Finlandia University is designated as a drug and alcohol-free campus and will comply with all the provisions of Public Law 101-226:

1. The College expects its students and employees to obey all federal, state and local laws concerning the possession, use, distribution and sale of alcohol and illegal drugs and will consider violation of such laws as grounds for appropriate sanctions up to and including expulsion of students and termination of employees when such violations occur on our campus or during an activity officially approved by the college.
2. The College also expects its students and employees to be aware that such violations of law are subject to penalties including fines and imprisonment and that, when appropriate, the college will refer to the appropriate enforcement agency any employee or student who is in violation of such laws.



3. The College also expects its students and employees to be aware that abuse of alcohol and illegal drugs have serious negative consequences to the health of the abuser including, but not limited to, cardiovascular disease, liver failure, and death.

4. The College expects its students and employees to be aware that they may seek information about drug and alcohol abuse and may seek aid in the form of referrals to appropriate treatment programs and support groups by contacting the Enrollment Services department **(add contact information here)**.

5. The College reserves the right to require employees and students who violate the statutory laws or policies of the college concerning alcohol and drug abuse to take part at their own expense in an appropriate counseling or treatment program as a condition of continued enrollment or employment at the college. The University also reserves the right to establish a program of early intervention in cases where employees are exhibiting behavior normally associated with alcohol or drug abuse.

6. Nothing in this policy may be construed in such a way as to deny any students or employees their rights to due process or any other constitutional or civil protection, nor should anything in this policy be construed in such a way as to conflict with statutory law.

The University Campus and instructional sites are smoke-free. Smoking is prohibited inside all campus buildings and in the areas immediately surrounding them. Smoking is permitted exclusively in the parking lots inside private automobiles. Appropriate containers for disposing of smoking materials are provided, and students and visitors are expected to use them. Violations may also be referred for a Code of Conduct action.

The University publishes an annual campus security and fire safety report of the campus community in compliance with the Student Right-to-Know and Campus Security Act, Public Law 101-542, as amended by the Higher Education Technical Amendments Public Law 102-26 and the Campus Sexual Assault Victims Bill of Rights as included in the Higher Education Amendments of 1992.

The report is to notify all prospective students, current students and all employees of crimes committed on or the vicinity of the campus of all fires reported on campus. The report will also provide information on the Universities policies, procedures for reporting crimes, emergency notifications, evacuations, program information and etc.

Inquiries concerning the information contained in this disclosure should be directed to the Campus Safety Office, Mannerheim Building, 906-487-7307.

The report is to notify all prospective students, current students, and all employees of the crimes committed on or in the vicinity of the campus and all fires reported on campus. The report will also provide information on the College's policies, procedures for reporting crimes, emergency notification, evacuations, program information and etc. The University is required under Section 668.46(b) of the Campus Security Act to publish and distribute an annual security report. The required disclosure information is contained in the Catalog and Student Handbook. The Campus Crime and Security Survey as required by the United States Department of Education is available at <https://ope.ed.gov/campusafety/#/>.

The University utilizes a text and email Emergency Notification System for dissemination of emergency information and timely warnings. Students can sign up for these messages when they arrive on campus. An emergency notification is an urgent communication regarding a significant emergency or dangerous situation that may compromise the health and safety of members of the campus community. Typically, an emergency notification is provided without delay upon confirmation of an imminent or impending threat and empowers the recipient to take appropriate action to minimize injury or loss of life.

The University provides public statistical information concerning criminal offenses that occur at our campuses. This information can be found at the Campus Safety Offices.

#### 4. ADMINISTRATIVE CAPABILITY

##### **Adequate Checks and Balances Procedures**

The University administers the federal aid programs with adequate checks and balances in its system of internal controls. The University divides the functions of authorizing and disbursing financial aid funds so that no office has responsibility for both functions with respect to any student awarded aid. The functions associated with the authorizing of funds rests with the Financial Aid Office. The responsibility for disbursing funds resides with the Student Account Office. The two functions are carried out by at least two organizationally independent individuals who are not members of the same family or who do not together exercise substantial control over the University.

The Financial Aid office is responsible for:

- Reviewing and placing student's awards on their accounts.
- Calculating all return of Title IV funds and verifying the awards per term based on the actual eligible credit hours the student is enrolled to receive financial aid.

The Student Account Office is responsible for:

- Disbursing aid and requesting refunds to students
- Reviewing all return of Title IV calculations

## **Adequate Staffing Procedures**

The University is staffed at an adequate level to provide maximum service to the student population of the University. The following offices assist in administering and ensuring compliance for Title IV programs:

## **Admissions**

Before any student can receive information from the Financial Aid department, the student must submit all admissions requirements (application, transcripts, etc).

## **Business Office**

The Business Office is responsible for:

- Disbursing financial aid checks.
- Reconciling federal funds
- Drawing down funds.

## **Human Resources**

The Financial Aid department is responsible for verifying the Federal Work Study award eligibility for all students. The Financial Aid Department will assist the student in finding an available position and in completing any additional documents needed for payroll purposes. Before processing, Human Resources/Payroll must ensure the following:

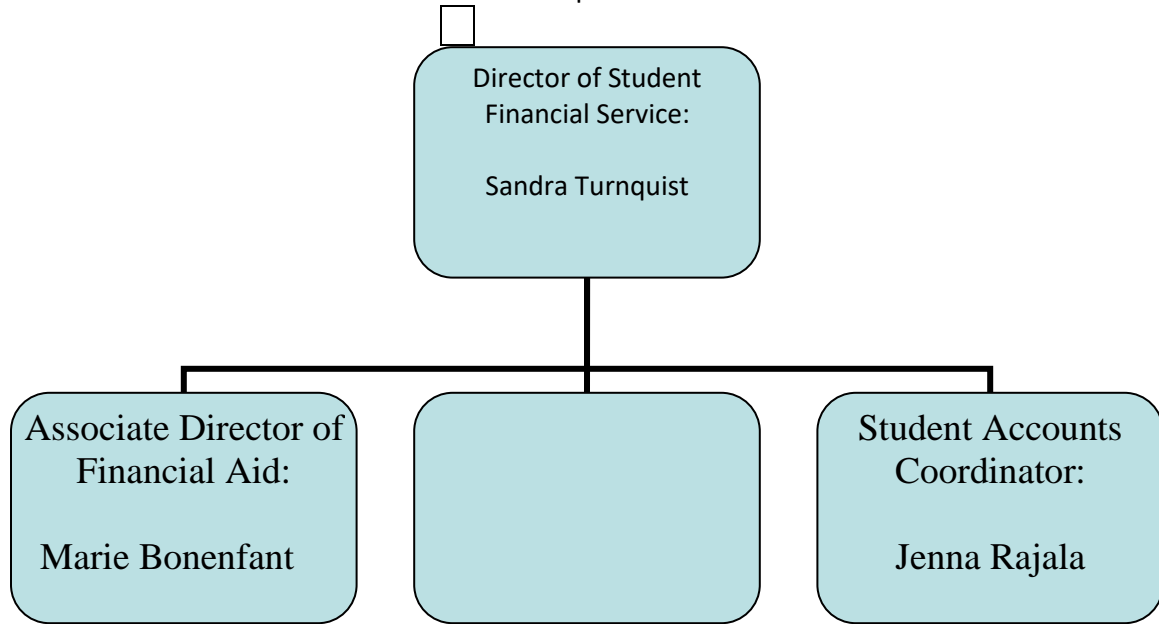
- All work study payments must be supported by approved timesheets.
- Timesheets must be submitted electronically by the student and approved by the supervisor.
- Number of hours worked should not exceed what has been approved.
- The hourly rate must agree to what has been approved.
- Number of hours worked per day should not exceed the allowed number of hours deemed eligible by the Financial Aid department.

# Financial Aid Department Responsibilities

- Development of financial aid policy.
- Publicize the availability of financial aid
- Advise students on all aspects of financial aid including, but not limited to, satisfactory academic progress, eligibility, appeals, rules and regulations.
- Communicate to students the effect of enrollment status on the financial aid award.
- Calculate return to title IV to determine if a student owes a repayment for an official or unofficial withdrawal
- Calculate refunds and repayments for financial aid students who withdraw from College.
- Calculate cost of attendance
- Submitting FISAP report.
- Determine student eligibility for Title IV funds.
- Track documents which applicants have placed on file.
- Verify application data on selected applicants.
- Collect progress reports for academic satisfactory progress.
- Reconciles program and fiscal records at least monthly.
- Screen and certify veterans and veterans' dependents who apply for Veterans Administration educational benefits.
- Determine student eligibility for loans and award loans based on regulations and guidelines
- Submit loan information to the Department of Education to originate and reconcile student loans

## Student Financial Services Structure

The Financial Aid Department and Student Accounts Department are trained for the administration of the Title IV Programs. The following diagram illustrated the organizational structure of the Student Financial Services Department:



## Financial Aid Programs in which the University Participates

### 1. Federal Pell Grant

The Federal Pell Grant is designed to help pay university related expenses. The exact dollar awarded is determined by Congress. Funds are calculated each year based on:

- a. The Students Expected Family Contribution (once processed and verified if required)
- b. The number of credits the student is registered each semester for classes required for the major.

The University uses the Comspec/Empower system to calculate the student's Pell Grant award by utilizing the Pell Grant chart provided by the Department of Education. Pell Grant funds are awarded for the fall and spring semesters at the beginning of the school year with summer awards at a later date closer to summer semester. The maximum Pell Grant for full-time students for the 2023-24 academic year is \$6395.

The Federal Pell Grant award is prorated when a student is enrolled in less than 12 credits for the semester (less than full-time). Depending on the amount of Pell grant eligibility, the chart below may not apply to all students. Some students attending less than full time may not be eligible to receive a Pell grant award:

- 50% of award when taking 6-8 credits a semester
- 75% of award when taking 9-11 credits a semester
- 100% of award when taking 12+ credits a semester.

The financial aid award begins with the Fall semester. Finlandia awards all incoming students who have been accepted and have a FAFSA (ISIR) received. If a student chooses to not do a FAFSA an award will be presented with just the Institutional Financial Aid Award.

## **Year-Round Pell**

Section 401(b)(8) of the Higher Education Act of 1965 (HEA), as added by section 310 of the Department of Education Appropriations Act, 2017 (Title III of Division H of P.L. 115-31, the Consolidated Appropriations Act, 2017), allows a student to receive Federal Pell Grant (Pell Grant) funds for up to 150 percent of the student's Pell Grant Scheduled Award for an award year. This provision is effective beginning with the 2017–2018 award year.

## **2. Federal Supplemental Educational Grant (SEOG)**

FSEOG is similar to the Federal Pell Grant in that it does not have to be repaid except in cases involving a student's complete withdrawal. A student must be eligible for a Federal Pell Grant to be considered for a FSEOG Grant. There is no separate application for these funds; all students who complete the FAFSA are considered and awarded FSEOG if eligibility

All students for the 2022-23 academic year are awarded 3000 initially with more being awarded if funds allow.

## **3. Federal Direct Loans**

The University participates in the Federal Direct loans to help those students who otherwise would be unable to attend.

There are three types of Direct Loans:

### **PARENT PLUS LOANS:**

The Parent PLUS Loan is a federal Direct student loan available to the parents of a dependent undergraduate student. The Direct Parent PLUS Loan offers a fixed 7.54% interest rate for the 2022-23 school year and flexible loan limits. To be eligible, a parent can't have an adverse credit history. However, the credit check for a Parent PLUS Loan is not as stringent as that for a private student loan. If you were denied a private student loan, you may still qualify for a Parent PLUS Loan. Parent PLUS Loans have a 4.228% origination fee for loans first disbursed on or after October 1, 2021 through Sept. 30, 2022.

### **SUBSIDIZED DIRECT STUDENT LOAN:**

The Subsidized Direct Student Loan provides students with the opportunity to borrow funds for education costs at a low interest rate. For students with a defined need, the federal government subsidizes the interest during certain specified periods. Students who are new to borrowers on or after July 13, 2013 cannot receive subsidized loans for more than 150% of the published length of the borrower's educational program.

Loans that are first disbursed on or after July 1, 2020 and prior to July 1, 2021 have a fixed interest rate of 2.75%.

Students are eligible for the following amounts based on the following:

0-23 credits: \$3500 annually  
24-47 credits: \$4500 annually  
48+ credits: \$5500 annually

### **UNSUBSIDIZED DIRECT STUDENT LOAN:**

The Unsubsidized loan is not awarded on the basis of need. The student will be charged interest from the time the loan is disbursed until it is paid in full. If the interest is allowed to accumulate, it will be added to the principal amount of the loan.

Eligibility for a subsidized loan is always considered first, but if the student's limit does not meet need, an unsubsidized loan will be considered for dependent and independent students.

To be eligible for Direct Loan funds, the student must complete the FAFSA application and apply and be accepted to the University. If applications are completed, an email/letter will be mailed to the student containing instructions to review the financial aid terms and conditions, accept or decline a student loan and how to complete any required forms and submit any required documents.

Students will be able to view their award notification and instructions to receive their funds on their Empower accounts under the Financial Aid tab once their award has been completed. If the student decides to take out the loan, there are additional steps for the student to complete. Students must complete the Master Promissory Note (MPN), and Entrance Counseling electronically through the [www.studentloans.gov](http://www.studentloans.gov).

A student must be enrolled in at least 6 credits to be eligible for the loan. Additionally, a borrower must meet the standards of academic progress to be eligible for a loan. The standards of academic progress are measured in three areas:

Cumulative GPA  
Completion Rate  
Maximum Time Frame

Students may go to the Financial aid website to see the guidelines for satisfactory academic progress (SAP). Financial Aid will only pay for classes required for the students major.

Freshmen who are also first-time borrowers will have to wait 30 days into the semester before the loan will be disbursed.

Students who receive subsidized and unsubsidized loans in the fall and spring may not be eligible for any additional loans for the summer semester.

### **Entrance Counseling and Master Promissory Note**

Before making the first disbursement of a loan to a direct loan borrower, the university must ensure the student has completed the entrance counseling and signed the Promissory Note. Entrance Counseling helps the student to understand the responsibilities regarding the loan. Students need to wait until they have received an award notification email before completing these, which can be completed at [www.studentloans.gov](http://www.studentloans.gov). Once completed the university will be notified by the Department of Education. If a student already completed counseling at another university, the student is not required to complete the counseling again.

### **Exit Counseling**

Repayment normally begins 6 months after students complete their program of study or cease being enrolled at least half-time (summer semester does not count)

The office sends an email to the students who will be graduating, leaving school, or dropping below half time who have borrowed Direct Loans informing them of this requirement. During exit counseling the student will review rights and responsibilities.



## **4. Federal Work-Study (FWS)**

FWS is a federal financial aid program to provide part-time employment for eligible students. Funding is based on the information that is provided on the FISAP. Students who qualify for financial aid may participate in the Federal Work Study Program to help pay indirect educational expenses. Students who participate in this program are paid at least minimum wage for hours worked; checks or direct deposits are issued on a bi-weekly basis. An effort is made to place students in jobs that further their educational and career goals.

To be eligible for FWS, students must have indicated on the FAFSA that they were interested in FWS. Students must:

1. Be eligible to receive need-based funding (not including unsubsidized loans)
2. Must be enrolled in at least 6 semester hours.
3. Demonstrate financial need.
4. Meet the satisfactory academic progress requirements.
5. Be a citizen or permanent resident of the United States

### **Award Amounts**

The amount of funds available and the number of students seeking FWS positions determine amounts of FWS awards.

Student employees may not earn more than the dollar amount of their award. It is the responsibility of the Financial Aid department, the payroll department, supervisor, and student to monitor FWS earnings to ensure that the employee does not earn more than the awarded amount.

It is possible for a student employees' work program and award amount to change before and during the academic year. Changes could be the result of changing financial circumstances, receipt of additional financial aid, a change in the number of enrolled credits, etc.

### **Financial Aid Department Responsibilities**

1. Determines student's eligibility for Work-Study.
2. Identifies Work-Study job locations and supervisors through job postings.

3. Assists student with processing all financial-related paperwork.
4. Process FWS contracts

### **Supervisor Responsibilities**

1. Provide proper training
2. Set expectations
3. Involve the student employee in the activities of department teams
4. Be a teacher/mentor and role model by displaying proper work ethics.

### **Hiring Process**

Department supervisors request a work-study position by submitting a job description to the Financial Aid department. Work-study is based on a first-come first serve basis. Once the Financial Aid department ensures the student's eligibility, the supervisor will make the selection on the student who best meets the needs. The supervisor will have the option to reject a student if the student is not qualified for the position based on the department's needs. Once the student employee is hired, (s)he completes and signs the Federal Work Study Contract from the Financial Aid department and Human resources documents.

Students who are enrolled at least six or more credit hours in their major may work a maximum of 20 hours a week, depending on their eligibility. Students cannot work when they are supposed to be attending class. Students who participate in this program are paid at least minimum wage for hours worked. It is the supervisor's responsibility to approve and sign work timesheets via the online portal by the designated deadline as determined by the Finance Department of the University

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### **Summer Employment**

Federal Work Study summer employment capacity is determined by budget constraints and need.

## **5. State Programs**

### **MICHIGAN STUDENT AID PROGRAMS**

The Office of Postsecondary Financial Planning, located within the Michigan Department of Treasury, encourages students to pursue postsecondary education by providing equality of access to student financial resources and information. Through the administration of various student financial assistance programs, students receive the guidance and funding necessary to pursue their educational goals.

Finlandia University participates in numerous state programs and the university is able to attain information on what the student is eligible for by logging into

<https://misg.guarantorsolutions.com/ApplicationSignon/SignOn.aspx>

Once the school enters the student's information into the portal it will list the program and amount the student is eligible for. In order for the school to receive that information the student must:

File a FAFSA by March first of year attending the university  
List Finlandia University 1<sup>st</sup> on the FAFSA by using school code: 00232200  
Be a Michigan resident

## **6. Institutional Scholarships/Grants**

### **Scholarship Opportunities**

**All Institutional Scholarships are not tuition specific unless specified**

#### ***ENTRANCE SCHOLARSHIPS***

For the 2023-24 there is a new scholarship calculator online. Link :

<https://myscholarshipcalculator.paperform.co/>

#### ***INSTITUTIONAL SCHOLARSHIPS***

Institutional Scholarships can be found here:

<https://www.finlandia.edu/financial-aid/scholarships/>

**All Institutional Scholarship recipients must maintain a cumulative 2.0 to receive the above. These scholarships are reviewed on an annual basis unless the student is on financial aid suspension.**

## **Financial Aid Information**

Financial Aid department establishes and makes readily available to enrolled and prospective students a description of all available financial aid programs (including both need-based and non-need-based programs), and for each of those programs the University provides:

1. Student eligibility criteria for each program
2. Procedures required to apply, and all necessary forms

### 3. Criteria for selecting recipients and for determining award amount

The University provides information concerning awarded aid including:

- Conditions and terms of employment under the Federal Work-Study Program (to include a full job description)
- Terms of any loan that is part of a student's aid package, a sample loan repayment schedule for sample loans, and the necessity for repaying loans
- Method and frequency of financial assistance disbursements to students

The University also provides information concerning the rights and responsibilities of the student aid recipient, including:

- Criteria established for continued eligibility under the Satisfactory Academic Progress conditions
- Criteria concerning how to re-establish financial aid eligibility for a student who has failed to maintain satisfactory academic progress.

## Financial Aid Counseling

The primary purpose of the Financial Aid department is to provide financial resources to students who would otherwise be unable to pursue post-secondary education. Finlandia University offers a variety of aid, such as grants, loans, scholarships, and work-study to assist as many qualified students as possible. To be considered for federal student aid, students must be unconditionally admitted into an eligible degree-seeking program. The University provides guidance to new and continuing students concerning financial aid application procedures in many different ways. The Financial Aid department provides general application and eligibility information within the University's Student Handbook. In addition, the Financial Aid department provides a great deal of application information via the department's website.

To be considered for financial aid, a student must:

- Complete the FAFSA or Renewal Application.
- Apply and be accepted by the college.
- Provide any other requested documents for completion of the student's financial aid file.

The University uses the FAFSA as the basis of our financial aid process. This application is also used as the basis for state aid. There is no separate application for State aid. Electronic Student Aid Reports (ISIRS) are imported for any student that has completed a FAFSA and included the Federal code. Once the student has also submitted an application for

admission to the College, a Financial Aid award is created for the student. An email is sent to the student with instructions for viewing and completing Financial Aid requirements. Most aid programs are based on the individual need of the applicant and/or parent. Demonstrated financial need is determined by completing a Free Application for Federal Student Aid (FAFSA) on the web at <https://studentaid.ed.gov/sa/fafsa>. Once the student submits the FAFSA, it is processed by the U. S. Department of Education. The College receives the SAR from the Department weekly. Awards are determined using the “Expected Family Contribution” (EFC) found on the SAR; this is the amount that the student and his/her family should be able to contribute to educational expenses. The University has established cost of attendance estimates for various categories of students. The EFC will be compared to the cost of attendance to determine the student’s eligibility for federal financial aid.

## **Cost of Attendance**

The basic components of student budgets include:

- Tuition and Fees
- Books and Supplies
- Room and Board (Living on campus, with parent or living on own)
- Transportation
- Miscellaneous and Personal expenses

Budgets are derived from a summation of actual costs (Tuition and Fees) and estimated costs (off-campus room & board, books, transportation and personal expenses). Tuition expenses are based on 12-18 hours of enrollment per semester. The personal expenses/miscellaneous component does not include the fees associated with receiving a Direct Student Loan. The cost of room and board if living on own is derived from average cost of rental in the region.

All student budgets are considered good-faith estimates of the projected educational expenses that most students may incur while attending the University.

Cost of Attendance budgets are updated annually by the Director. Rationales used for determining component amounts are disclosed prior to the awarding of financial aid for the school year.

## **Award Notification**

The award notification provides student’s outcome of awarding from the contribution (EFC), It also indicates the enrollment period, terms, or payment periods as they relate to awards and their disbursement for student costs. The award notification also provides detailed information describing the amount and type of aid awarded and any conditions linked to award eligibility for each type.

## **Fiscal Records and Reconciliation**

The Financial Aid department sends reports that document all financial aid transactions to the Student Accounts Office. The Finance Office will post to the General Ledger after they receive receipt of the G5 drawdown on the bank statement; showing the funds have been deposited into the bank account. Each Title IV program has its own General Ledger account number which documents individual transactions. These accounts are reconciled on a monthly basis. Reconciliation is a shared responsibility between the Student Financial Services and the Finance Office. This responsibility involves joint action by the Student Financial Services and the Finance offices to identify discrepancies and to connect those discrepancies in accordance with established deadlines, and to ensure the two offices are performing the separation of duties/functions as it relates to cash management.

Reconciliation of Title IV programs begins with the Student Financial Services department generating reports through Student Accounts information system Empower. Financial aid awards and disbursement records are compared with reports generated from the Department of Education system, Common Origination and Disbursement (COD) by the staff in Financial Aid.

The Student Accounts Office applies the proper tuition, fees, and any other charges the student is expected to pay to the student's Accounts Receivable. Subsequent the disbursement of financial aid to the student account, a list of student refund recipients and amounts to is forwarded to the Finance Department for check disbursement. Once completed, the Student Accounts Office sends the students refund checks via regular mail to the current address on file if they do not get picked up in person.

## **Records Management and Retention**

The University Complies with the Code of Federal Regulation for records and retention. You can find the regulation here: <https://www.ecfr.gov/current/title-34/subtitle-B/chapter-VI/part-668/subpart-B/section-668.24>. The Financial Aid department establishes and maintains on a current basis application submitted for Federal Student Aid program funds. In addition, the office maintains program records as required under federal regulation. Business records, demonstrating the proper use of funds, and Loan Program records are kept on a current basis. The Registrar's office keeps official academic records (transcripts) of enrollment and credit earned in the credit program in perpetuity.

## **Confidentiality of Student Records**

### **Family Education Rights and Privacy Act of 1974**

Finlandia University complies with the provisions of the Family Educational Rights and Privacy Act of 1974 (FERPA), which relates to that section of Public Law 93-380 (H.R. 69) entitled "Protection of the Rights of Privacy of Parents and Students." This Act affords students certain rights with respect to their educational records and includes, but is not limited to, the right to consent to disclosure of personally identifiable information contained in the student's educational records, except to the extent that FERPA authorizes disclosure.

Students who do not want public or directory information released to representatives independent of the college should complete a Non-Disclosure Information Form in Enrollment Services at one of the College locations. The Family Educational Rights and Privacy Act of 1974 (FERPA) and the Student-Right-to-Know and Campus Security Act of 1990 are available in their entirety in the offices of the deans and Enrollment Services.

## Notification of Rights under FERPA

The Family Educational Rights and Privacy Act (FERPA) affords students with the following rights with respect to their education records:

- The right to review the student's education records.
- The right to request the amendment of the student's education records that the student believes is inaccurate or misleading.
- The right to consent to disclosure of personally identifiable information contained in the student's education records, except to the extent that FERPA authorizes disclosure.
- FERPA assigns rights to students once they reach eighteen years of age or enroll in a postsecondary institution.

Included in these rights is the right to release information. A person, other than the student, requesting information on a student must submit written authorization from the student. Students requesting information must present photo identification before the information will be released to them. ***Students who feel that this policy has been applied unfairly to their situation have the right to appeal.***

## Fiscal Operations Report and Application to Participate

On an annual basis, the Fiscal Operations Report and Application to Participate (FISAP) is prepared and submitted by the Director of Student Financial Services. Supporting documentation for the completion of the FISAP is retained by the Director of Student Financial Services and the Finance Department.

The Finance Department and Student Financial Services department work together to collect the necessary statistics to complete the report. The finalized data is loaded into the Electronic FISAP Program and sent to the Department of Education. The signature page and required certifications are sent certified mail.

## 5. GENERAL REGULATIONS

## Verification

Verification is the process the Financial Aid department uses to compare the information provided on the Free Application for Federal Student Aid (FAFSA) with the documentation provided by the selected student.

### Selection of Applicants to be Verified

Students who are selected by the Central Processor for verification must complete forms based on the Verification Group (V1-V6).

If, while reviewing a file, financial aid staff finds any incomplete and/or conflicting information, the file will be selected for verification. All files selected for verification by the College will be treated as V1: Standard Verification Group.

- At the time the student's Institutional Student Information Record (ISIR) is received, a tracking requirement is generated notifying the student that he/she was selected for verification. The student will be able to see what documentation is required to complete the verification process.
- No federal or state aid is awarded to a student until the verification process is completed.

Any students with unusual circumstances or who have indicated a significant change in household size or income due to death, illness or involuntary employment change or loss may be reviewed for Professional Judgment if requested by the student.

### Acceptable Documentation & Forms

Required documentation will vary from student to student based on several factors, including: dependency status, income thresholds, comment codes, reject codes, and ISIR flags. The applicant must submit all required documents and forms to the Financial Aid department by the posted deadline. If the applicant fails to submit documentation in the specified time range, the application may go un-reviewed, and the student may not be eligible for financial aid during that academic year of enrollment.

Most forms that may be requested by the Financial Aid department are available through the student's Empower Account

General Verification forms are requested based on specific Verification Groups and are used to verify specific information as follows:

- **Independent Verification Worksheet-** used to verify student and/or spouse's household size, number in college, wages for non-income tax filers, receipt of SNAP benefits and Child Support Paid.



- **Dependent Verification Worksheet** – used to verify student and parent’s household size, number in college, wages for non-income tax filers, receipt of SNAP benefits and Child Support Paid.
- **Statement of Educational Purpose Worksheet** – used to verify that any financial assistance the student receives will be used for educational purposes and cost of attending.

Additional Verification forms may be requested based on special cases.

### **Data Elements to be Verified (GEN-18-03)**

Applicants who are selected for Verification are placed in different Verification groups by the Department of Education. Requirements are posted for each student based on Verification items required for that group based on federal regulations.

Verification groups are as follows:

**V1—Standard Verification Group.** Students in this group must verify the following if they are tax filers:

Tax Filers:

- Adjusted Gross Income (AGI)
- U.S. Income Tax Paid
- Untaxed Portions of Individual Retirement Account (IRA) Distributions
- Untaxed Portions of Pensions
- IRA Deductions and Payments
- Tax Exempt Interest Income
- Education Tax Credits

Nontax Filers:

- Income Earned from Work

Tax Filers and Non-tax filers

- Number of Household Member
- Number in College

**V4-Custom Verification Group.** In addition to the items in the Standard Verification Group Students must verify:

- High School Completion
- Identity/statement of educational purpose

**V2, V3, V6-Reserved for future use by the Department**

## File Review

File review is used to ensure an applicant has met all of the required student and program eligibility criteria for which financial aid is awarded. In addition to verification, the financial aid office must review an applicant's file for database matches; reject codes, and other comments or codes. The Financial Aid department must also review subsequent Institutional Student Information Records (ISIRs) for changes that may affect the applicant's aid eligibility.

## Review of Subsequent ISIR Transactions – Post screening

Per federal regulations, all subsequent ISIR'S are reviewed on a weekly basis. The Financial Aid Office is responsible for the overview and management of the import and verification process of subsequent ISIR transactions to ensure accuracy and consistency.

The students who have submitted subsequent, additional, updated, or corrected FAFSA information are identified. The Subsequent ISIR is made active then the student will be run through all of our rules in Empower again (e.g. assigning verification documents, assigning documents resulting from a C-code, assigning documents resulting from a reject code) to determine if the student's eligibility is accurate.

## Attendance Verification

Taking attendance is **not required** for the instructors. Students are required to officially notify the college if they are withdrawing. The student must fill out a withdrawal form if completely withdrawing from all classes. The date the financial aid office uses for R2T4 is the date the Registrar signs the form

Last day of attendance (LDA) is required to be reported for at **least one class**. If not, **the LDA will be requested from the instructor**. In the absence of evidence of a last day of attendance at an academically related activity, a school must consider a student who failed to earn a passing grade in all classes to be an **unofficial withdrawal**.

## Initial Reporting Period and Reinstatement Process

Instructors will verify student attendance during the initial reporting period at the beginning of each semester. If the student does not attend during the initial reporting period and/or their attendance is not verified during the initial reporting period, the student will be dropped from the class.

**No changes can be made to the student's schedule or major once the drop/add period is over.** Financial aid funds can only pay for classes that are required for the student's major. It is the student's responsibility to meet with an academic advisor to ensure their classes are required for their major before the end of that period.

## Disbursing Title IV Funds

Attendance must be verified by instructors during the initial reporting period or during the reinstatement period before Title IV funds can disburse. If attendance has been verified and the student is eligible to receive Title IV funds, the funds will disburse to the student's account on the scheduled disbursement date for that semester. The Student Account Office will then process disbursement checks within 14 days from the disbursement date

- If you have been awarded a loan, you must have signed your promissory note, completed entrance counseling, and be registered for at least 6 credit hours that are required for your major.

## Retroactive Payments

If the University did not make a disbursement to an enrolled student for a payment period the student completed (for example, because of an administrative delay or because the student's ISIR was not available until a subsequent payment period), the University must pay the student for completed semesters within the award year if the student was eligible for payment in those semesters.

The Financial Aid department can make retroactive disbursements in one lump sum. Determining payment for previous semesters:

- The Pell Grant must be based in **hours completed** by the student for the semester. Completed coursework counts toward enrollment status including earned Fs. To originate a Direct Loan to include a previous payment period, the student must have completed 6 credit hours or half-time in the semester. If the student borrower did not maintain eligibility for the Direct Loan throughout the previous semester such as half-time, you may not include the semester for retroactive payment.

## Late Disbursements

The Financial Aid department must offer of a late disbursement if the student completes the semester or withdraws from all classes during the semester. A late disbursement to a student who withdraws during the semester is called a Post Withdrawal Disbursement (PWD).

A student must be considered for a late disbursement if:

- The US Department of Education processed a SAR/ISIR with an official EFC before a student became ineligible.

The processed date on an ISIR is used for determining late disbursement for Pell Grants.

- A Direct Loan must have been originated by the Financial Aid department prior to the date the student became ineligible.
- FSEOG must have been awarded prior to the date the student became ineligible.

### **Limitations on Late Disbursements**

- **General:**

- A student is generally not eligible for a **Direct Loan** if, when the ISIR is processed, they are no longer enrolled half-time as defined by the Financial Aid department.
- For **Pell Grant and FSEOG**, the student is not eligible for a late disbursement if the student is no longer enrolled when the ISIR is processed.

- **Specific:**

Even if a student meets the general limitations, the College is prohibited from making:

- A late second or subsequent Direct Loan disbursement unless the student has graduated or successfully completed the semester. Successfully completed means the college considers the student to have passed the coursework.
- A late Direct Loan disbursement to a first-year, first-time borrower who withdraws before the 30th day of the student's program of study.
- A late disbursement of a **Pell Grant**, if the college does not have a valid ISIR by the published deadline for the year established by the US Department of Education.

## **Fraud**

As stewards of Title IV funds, Finlandia University is obligated to assure that processes are developed to protect against fraud by either applicants or staff. All Student Financial Service staff are responsible for detecting and reporting fraud. If, in the financial aid administrator's judgment, the applicant and their family have provided a fraudulent application or documentation, it must be reported immediately to a supervisor. An indication of fraud is when Financial Aid is applied for, received or not spent for its intended purpose, generally through theft, misappropriation or false statements.

In the context of the financial aid office, fraud is the willful misrepresentation or falsification of information for the purpose of securing financial aid that the individual is not eligible for or not eligible to the extent received. Title IV fraud can take many forms, including but not limited to the following:

1. Falsified documents or forged signatures on an application, verification documents, loan promissory notes, or any other documents submitted to the financial aid office
2. False statements of income
3. False statements of citizenship
4. Use of false or fictitious names or aliases, addresses, or SSNs, including the deliberate use of multiple SSNs
5. False claims of independent status
6. Patterns of misreported information from one year to the next

If Finlandia University suspects that a student, employee, or other individual has misreported information, altered documentation, or forged signatures to increase student aid eligibility or to fraudulently obtain federal funds, it must report those suspicions and provide any evidence to the Department of Education's Office of Inspector General. If you purposely give false or misleading information you may be fined, sentenced to jail or both.

## Eligibility for Retaking Coursework

Federal regulations allow a student to receive aid for repeating a previously passed course as long as it is the first repeat of the course and it is required in the program. A previously passed course is a course with a "D" grade or better. This retaken class may be counted towards a student's enrollment status, and the student may be awarded Title IV aid for the enrollment status based on inclusion of the class.

If a student withdraws before completing the course that he or she is being paid Title IV funds for retaking, then that is not counted as his or her one allowed retake for that course. Although, a student may be repeatedly failing the same course, normal Satisfactory Academic Progress (SAP) policy still applies to such cases.

**Note:** A student who passes a class once, repaid for retaking it, and fails the second time, **may not** be paid for retaking the class a third time.

A student who passes a class once, repaid for retaking it, and withdraws before completing the course, **may** retake the class and be eligible for Title IV aid.

For programs that require students to retake all of the coursework for a term in which a student fails a course, any courses retaken that were previously passed in this case are not eligible for Title IV aid.

If a student who received an incomplete in a course in the prior term and is completing the coursework in the subsequent term to replace the incomplete in the prior term, the student

will not be eligible for Title IV funds for completing the coursework. If a student who received an incomplete in a course in the prior term and is retaking the entire course for credit in the subsequent term, the hours in the course count toward the student's enrollment status, and the student may receive Title IV funds for retaking the course.

## **Withdrawals**

To withdraw after registering, students must submit a complete withdrawal form to the Registrars Office.

### **Withdrawal from a Course**

A student who wants to withdraw from a course after the official Schedule Adjustment (Drop/Add) period and prior to the official start of final exams may do so by completing a **Request for Course Withdrawal** form. Students who withdraw before the beginning of the twelfth (12th) week of the fall or spring semester or seventh (7th) week of the summer term will receive a grade of "W" for any course withdrawn.

### **Withdrawal from the College**

A student who wants to withdraw from the university prior to the official start of final exams may do so by completing a **Complete Withdrawal** form. Students who withdraw before the beginning of the twelfth (12th) week of the fall or spring semester or seventh (7th) week of the summer term will receive a grade of "W" for any course Withdrawn

### **Schedule Adjustment (Drop/Add)**

Schedule adjustment (drop/add) period is the first seven days of each semester. The drop/add period begins on the first instructional day of the term. Students may drop and add courses on campus or online during this period. However, students may not drop their final course after the first official day of the term. Students are not responsible for payment for courses if they drop them during schedule adjustment. Students will not receive a grade for courses dropped during the schedule adjustment period. It is the student's responsibility to print a copy of the Class Schedule after dropping courses online to verify that she/he is no longer enrolled in the dropped courses.

## **Refunds**

Before the official first day of classes, students will receive a complete refund when withdrawing from the college. See special charges for those residing on campus. During schedule adjustment when dropping and adding of individual classes are allowed, students may drop a course and receive a full refund for that course if the student has not completely

withdrawn from school. Students withdrawing from the college should refer to the prorated refund schedule. After the schedule adjustment period ends, students may receive a partial refund only if they completely withdraw from the college.

### **Return of Title IV Funds (R2T4)**

When withdrawing from all classes in a payment period, student recipients of federal Title IV aid (Federal Pell Grants, Federal Perkins Loans, Federal Direct Loans, and Federal Supplemental Educational Opportunity Grants) are subject to additional rules and regulations, which may result in cancellation or reduction of federal Title IV aid upon withdrawal from classes in a payment period.

If a student earns a passing grade in one or more of his or her classes offered over an entire period, for that class, the College may presume that the student completed the course and thus completed the period. If one instructor reports that the student attended through the end of the period, then the student is **not a withdrawal**.

### **Official Withdrawal**

If a student completely withdraws during the first 60% of a semester, the student may have to return some of the financial aid funds back to the college or the U. S. Department of Education. A Post Withdrawal calculation is performed for all Title IV financial aid students. Any funds that the student earns will be disbursed to the student.

The Financial Aid department performs a R2T4 calculation on CPS (Central Processing System for US Department of Education) to determine the amount of aid earned based upon student attendance.

When a student receiving Title IV funds completely withdraws before or on the 60% date, a R2T4 calculation is performed based on the last date of attendance. An email from the Registrar office informs the offices of the withdrawal. The date the student that the student attended is listed on the report. The student's information is entered into the COD system. The Return to Title IV and the **Official** Withdraw program is run. The student funds are then reduced by the amount of federal funds that is determined to be returned. This information is given to the business office to review the calculations and return the funds to the proper grant/loan program.

Although Federal aid is normally disbursed at the beginning of an enrollment period, this aid is "earned" as the student attends classes throughout the period. The difference in awarded and "earned" aid at the point of withdrawal may result in the need to return "unearned" aid.

Unearned aid will be returned to each source of aid received by the student, up to the total amount received from each source, in the following order:

- • Federal Direct Loan(s), Unsubsidized
- • Federal Direct Loan(s), Subsidized

- Federal Pell Grant
- Federal SEOG

Federal Work-Study (FWS) funds are **not** included in the calculation.

A federal aid recipient who withdraws from an enrollment period is subject to possible repayment of federal aid disbursed to the student (after payment of institutional charges) for living expenses and other educational needs. If the aid disbursed is greater than the “earned” portion of the aid at the point of withdrawal, it may be necessary for the student to repay all or a portion of the federal aid received. Each student who owes a repayment will be notified in writing by the Financial Aid department of the requirement to repay Title IV funds. Failure to repay funds will result in the termination of eligibility for federal financial aid at any institution. If a student completely withdraws after 60 % of the semester is complete, the student most likely will not owe a repayment. Students are highly recommended to contact the Financial Aid department before withdrawing.

## Unofficial Withdrawal

A student who leaves the College does not always notify the registrar’s office of his or her withdrawal. There are two categories of these unofficial withdrawals for purposes of Return to Title IV calculation.

1. If it is determined that a student did not begin the withdrawal process or otherwise notify of their intent to withdraw due to illness, accident, grievous personal loss, or other circumstances beyond the student’s control, the withdrawal date is the **date the school determines that the student ceased attendance** because of the applicable event.
2. **Dropouts** are withdrawals where an official notification is not provided. For these withdrawals, the withdrawal date is the last date of an academically related activity that the student participated in.

At the end of each semester, a program is run in ARGOS for Financial Aid students who made all F’s and I’s. This program includes the last date of attendance (LDA) for each class the student received an I or F. **If one or more, but not all, instructors reported a last day of attendance, the LDA reported will be used. If LDA is not available, the 50% point of the semester will be used.** If one instructor reports that the student attended through the end of the period, then it is not a withdrawal.

At the end of the semester, a student who has incomplete grades will not be considered to have withdrawn. A student who has received one or more “Earned F” grades will not be considered to have withdrawn.

After the R2T4 calculation is performed, the student’s account is updated, and the information is given to the Student Accounts Office to review and return the required amount of funds.

A determination of withdrawal must be made no later than 30 days after the end of the earlier of:



- The payment period,
- The academic year, or
- The student's educational program

***Institutional or other refund policies (State, accrediting agency) do not impact the amount of Title IV aid earned under a R2T4 calculation.***

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

Federal regulations require that students receiving financial assistance must maintain satisfactory academic progress toward completion of a degree. A student must maintain satisfactory academic progress as defined by the standards of academic progress policy. Satisfactory progress is not to be confused with "good standing". A student can meet the Finlandia University requirements of "good standing" and be allowed to enroll but not meet the minimum standards to receive financial aid while enrolled. The College measures a student's performance for satisfactory academic progress in three areas:

- Completion Rate,
- Maximum Time Frame, and
- Cumulative Grade Point Average

All students will be monitored for compliance with Federal Requirements for Satisfactory Academic Progress at the end of each term or yearly, whether or not the student received financial aid during those periods. At that time, a student will be in good standing, placed on a one semester warning, or placed into a failing SAP status and will be ineligible for continued aid. Students can view the status of their academic progress on Empower Account

The Standards of Satisfactory Academic Progress apply for all Title IV financial assistance programs including Federal Pell Grant, Federal Work-Study (FWS), Federal Supplemental Education Opportunity Grant (FSEOG), Federal Direct Loan Program, as well as assistance from the state.

### **A. Completion Rate (Quantitative Measure)**

At the end of each semester, a student's academic progress will be reviewed by comparing the cumulative number of attempted credit hours with the number of credit hours passed. Transfer courses accepted by the institution, Developmental courses, Incompletes, periods where Academic Bankruptcy was applied, and forgiven courses must be factored into the

completion rate calculation whether financial aid was received or not. Students must pass a certain percentage of the cumulative hours attempted to remain eligible for financial aid based on the following scale.

As soon as it becomes apparent a student will be unable to meet the satisfactory academic progress, the student is ineligible for Title IV aid.

**\*The SAP status is based on the entire academic record at all schools attended (includes all transferable hours) regardless whether the student received financial aid.**

## **B. Maximum Time Frame**

The maximum time frame for completing a program of study is 150% of the required length of the student's specific program. All attempted courses, to include transfer credits accepted by the institution, incompletes, periods where Academic Bankruptcy was applied, forgiven courses, and developmental courses, must be factored into the calculation for Maximum Time Frame. All attempted courses are included whether or not financial aid was received, or courses were successfully completed. A student is no longer eligible to receive financial aid once they have attempted 150% of the number of hours required for their degree or certificate.

A change in program of study will be allowed; however, aid will be granted only for additional required hours as determined by comparison of the two programs of study.

## **C. Cumulative Grade Point Average (Qualitative Measure)**

Financial aid recipients must maintain a 2.0 cumulative required grade point. This includes all attempted hours, transfer hours, and developmental work taken, whether or not financial aid was received, or courses were successfully completed.

## **Financial Aid Warning**

The Satisfactory Academic Progress (SAP) of financial aid recipients is reviewed at the end of each academic semester regardless of whether the student receives financial aid. If the student is not making satisfactory academic progress, the student will be placed on a one semester academic warning. A student on an academic warning is eligible to receive financial aid.

The warning is issued when the student does not meet the following SAP requirements:

- Cumulative GPA
- Completion Rate

**\*There is no warning semester for Maximum Timeframe.**

After attending one semester on academic warning, the student must have obtained the required GPA and/or completion rate to remain eligible to receive financial aid

## **Suspension**

When a student who is eligible for Title IV federal financial aid funds is suspended, whether the student serves the suspension or is readmitted upon appeal, the student may not be eligible to receive financial aid. A student must maintain satisfactory academic progress as defined by the standards of SAP policy. If the student does not meet the satisfactory academic progress requirements, the student must follow the institution's financial aid appeal policy to be considered for financial aid reinstatement.

***Approval of the student's appeal to the admissions committee for readmission does not reinstate the student's eligibility for financial aid.***

## **Financial Aid Appeal Policy**

Financial aid recipients who have failed to meet SAP policies and have been placed on Financial Aid Suspension may appeal in writing to the Appeals Committee. Appeals must be written, specifically addressing the extenuating circumstances that led the student to not achieve SAP and must provide documentation supporting such claims. Students must submit an appeal packet that includes (but is not limited to):

- The appeals application,
- Supporting documentation,
- Appeal degree plan (from the advising office) must be submitted to the Office of Financial Aid prior to or by the deadline indicated on the Jefferson State webpage or the financial aid appeals application.

Appeals will be considered for extenuating circumstances only, which may include, but are not limited to, the death of a family member, an injury or illness of the student or their immediate family member, or other special circumstances that are generally outside of the control of the student.

Supporting documentation must be provided or the appeal will be denied. All appeals will be considered on a case by case basis. If the Appeals Committee approves a student's appeal and determines that the student should be able to meet SAP requirements by the end of the next term, the committee may place the student on financial aid plan and reinstate the student's financial aid for one term only. If the Committee determines that it is not possible for the student to meet SAP by the end of the next term, and the Committee approves the student's appeal, the Committee will develop an Academic Plan for the student, that if followed, will ensure that the student is able to meet SAP requirements by a specific point in time, as determined by the Committee. Students who are approved on appeal must follow the plan set for them by the Appeals Committee and earn a "C" or

better and not withdraw. Appeals are continued as long as the student meets the minimum criteria set forth by the Appeals Committee and follows the academic plan approved. The decision of the Financial Aid Appeals Committee is final.

If a student is granted an appeal and fails to meet the requirements set to maintain eligibility while on an appeal, the student may appeal a second time if extenuating circumstances exist for the term in which the student lost their appeal. If appeals are granted, the student is only allowed to take the specified recommended hours determined by the Appeals Committee. Appeals are granted for funds only for which the student still has lifetime eligibility remaining and has not exceeded their loan limits.

## **Special Circumstances**

Federal regulations permit financial aid administrators to use their discretion on a case-by-case basis to modify data used to calculate the EFC by performing a Professional Judgment or Dependency Override. Administrators may also use their discretion to offer unsubsidized student loans to dependent students whose parents refuse to support them and are not eligible for a dependency override, resolve conflicting information and report cases of fraud.

## **Professional Judgment**

There are special circumstances that can be considered that may impact the student's financial aid eligibility such as unemployment due to termination, lay-off, close of business, or medical conditions. In these rare cases, the Financial Aid department may exercise professional judgment to adjust the student's Cost of Attendance or the data that determines the student's Expected Family Contribution. There must be a significant change to the family's income to be considered for a Professional Judgment.

## **Dependency Override**

There are special circumstances that may impact a student's financial aid eligibility due to a change in Dependency status. Federal regulations permit the University, at its discretion, to determine if unusual circumstances can be documented which would result in a dependency status change from Dependent to Independent for federal financial aid purposes. Unusual circumstances are parent(s) deceased, parent(s) incarcerated or unusual parental circumstances such as parent's whereabouts are unknown, abusive family environment, abandonment by parent, etc.

If a student believes he/she has special circumstances that may permit a Professional Judgment or Dependency Override they may request a review of his/her special circumstance prior to the offer of a Financial Aid award. The student must provide supporting documentation which may vary depending on the student's extenuating circumstances.

All required documentation must be provided within 10 business days of request by a Financial Aid Administrator. Requests will be reviewed on a case-by-case basis and all information will be kept confidential. The Financial Aid department will notify students of the status of his/her Request via College e-mail. The submission of a request does not guarantee an approval.

## **Students Whose Parents Refuse to Support**

As stated in the student handbook, "Students whose parents refuse to support them are not eligible for a dependency override, but they may be able to receive unsubsidized Stafford loans only. For a student to be eligible for this provision, you must get documentation (1) that his parents refuse to complete his FAFSA and (2) that they do not and will not provide any financial support to him. Include the date support ended. If the parents refuse to sign and date a statement to this effect, you must get documentation from a third party".

## **Conflicting Data**

The University has a proactive approach to identify conflicting information of students regardless of the source and whether the student is selected for verification. If any conflicting information is provided on any of the verification documents or verbally by the student, then changes are made to the student's ISIR by the financial aid department. If there is a substantial difference of conflicting information, additional documentation may be required from the student in addition to the required verification documents. If the financial aid department suspects that a student, employee, or other individuals has misreported information or altered documentation to fraudulently obtain federal funds, the act may be reported, and evidence provided to the Office of Inspector General.

## **Overaward**

An over-award is defined as the offered financial aid that exceeds student's budget and unmet need. Over-awards can occur for a variety of reasons such as:

- Student who is ineligible for the amount of aid received (administrative error)
- Student's award in an individual program exceeds the regulatory maximum
- Student's aid package exceeds his or her need
- Student's award exceeds his or her cost of attendance (COA)

- Student is receiving a Pell Grant or Iraq and Afghanistan Service Grant (IASG) at
- Multiple schools for the same period of enrollment
- Change in enrollment prior to census date
- Scholarship posted after aid has been packaged
- Late notification of scholarship/Tuition waiver

## **Resolving an OverAward**

The University has taken the necessary steps to ensure that students will not be overawarded.

Financial aid packages must be reduced (whenever possible) to eliminate an overaward. Most aid packages are developed with the assumption that the student will be attending on a full-time basis. When a student registers for a reduced course load, the award package will be reduced or eliminated.

Federal Pell Grant awards are not reduced to resolve overaward issues. Options to resolve the over-award include:

- Increasing the student's budget
- Reducing or cancelling other aid the College controls (i.e. institutional scholarship and third-party scholarships)
- Terminating the student's FWS employment or reducing future FWS employment hours
- Reduce subsequent disbursements during the award year if possible
- Returning loan funds that have not been disbursed to the student
- Returning disbursed loan funds during the award year to apply scholarship aids (disbursed loan cannot be returned if it is a result of advertent borrowing)

## **Overpayments**

An overpayment occurs when a student receives financial aid funds in excess of his/her eligibility. This may be caused by student or institutional errors, unresolved over awards, disbursements, misreported information, miscalculated COA, payment to ineligible student, payment in excess of grant or loan, or R2T4 calculation.

If a grant overpayment has been made due to an error on the part of the student or as per R2T4 calculation, then the student must repay the amount. If due to an error, the student must repay amounts of \$25 or more. If the overpayment is the result of a R2T4 calculation, the student must repay amounts of \$50 or more.

Procedures for Resolving Overpayment if the student owes a Pell repayment:

- A hold is placed on the student's account to stop further financial aid disbursement.
- Remove any future awards.
- A letter is sent to the student via email about the overpayment and what needs to be done to resolve the situation. The student will be given 30 days to resolve the payment with the College.
- The overpayment is posted on the National Student Loan Data System (NSLDS) within 30 days of the determination date. If the student resolves the overpayment within the 30 days, the College can remove the overpayment hold on the NSLDS.
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- If the student does not resolve the overpayment, the overpayment status will be transferred to the Department of Education. The overpayment hold will be removed from the Banner system since the overpayment will be handled by the Department of Education. Transferring the repayment will be documented on the student's account.
- The College sends a transfer of repayment letter to the Department of Education. The student will be notified via email of the transfer as well.
- Once the transfer is made on NSLDS the student will need to pay the Department of Education and the **school can no longer accept** payment.