SAINT MARY-OF-THE-WOODS COLLEGE
OFFICE OF FINANCIAL AID

Saint Mary-of-the-Woods College

Financial Aid

Policies & Procedures Manual

2014-15

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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.

Identity Statement

Saint Mary-of-the-Woods College, the nation's oldest Catholic, liberal arts college for women, was founded in 1840 by Saint Mother Theodore Guerin and the Sisters of Providence. Today, the distance and graduate programs serve both women and men, while the undergraduate campus program maintains its historic commitment to women. The College continues to be sponsored by the Sisters of Providence.

Value Statement

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

***Excellence**	***Community**	***Diversity**
***Integrity**	***Knowledge**	***Justice**

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 MISSION AND OBJECTIVES

Saint Mary-of-the-Woods College evaluates it 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).

PHILOSPHY

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
- various monthly newsletters
- SMWC website

Additional resources are published outside of, but are distributed through the Financial Aid Office. These resources include:

- The Student Guide published by the U.S. Department of Education
- *Funding your Education published by the U.S. Department of Education
- Pamphlets regarding electronic filing and Direct Loans published by the U.S. Department of Education.

Other disclosure and reporting requirements are met as follows:

- Annual campus security reports are distributed from the Vice President of Student Services and are available throughout the year in that office; 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 Director of Financial Aid. If the student has a complaint about the Director of Financial Aid, the student needs to send a written complaint to the Assistant VP of Enrollment Management or 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 for more information regarding the Higher Learning Commission or state agencies.

THE 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 parents and/or students
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 2nd floor of Guerin Hall, room #224.

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
The website is: www.smwc.edu

TELEPHONE

Telephone calls are answered in a friendly and professional manner. Typically, the Administrative Assistant answers the general office number (812) 535-5100 and directs the call to the appropriate person if she cannot resolve the question/concern.

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

President
l
VP for Advancement & Enrollment Management
l
Director of Financial Aid
l
Asst. Director .FA Counselor(s)
l
Student Workers

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 date stamped and routed accordingly. If necessary, correspondence and forms may be put in student files for documentation purposes.

The Financial Aid counselor's 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 is to be date stamped and 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 indentifying information from the student or authorized person prior to releasing information. Such identifiers may include, but are not limited to: address, date of birth, social security number, specific grant information, etc.

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. This account is created and maintained by the SMWC IT Department.

RECORDS MANAGEMENT & RETENTION

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's Office.

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

- Creating a folder for every current, enrolled student as needed
- 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.

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

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 Registrar's Office.

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

To review the policy please visit:
http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html

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 telephone or in writing to a non-campus person or agency without a clearance from the employee or student.

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, or 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 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
- 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.

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 2014-2015 ACADEMIC YEAR

- **Freshmen**: $28,226 (additional class fees may apply)
- Tuition and fees(upper class): $27,672 (additional class fees may apply)
- Room and Board: $10,250 (standard)

DISTANCE EDUCATION FOR THE 2014-2015 ACADEMIC YEAR

- Tuition: $496 per credit hour

GRADUATE EDUCATION COSTS FOR THE 2014-2015 ACADEMIC YEAR

- Tuition: $555 per credit hour (MLD)
- Tuition: $625 per credit hour (MAMT)
- Tuition: $650 per credit hour (MAAT)
- Fees: $200 per semester (MLD are $200 per semester)

INSTITUTIONAL SCHOLARSHIPS AND GRANTS

A complete list and criteria of our Institutional scholarships/grants can be found on our website at: www.smwc.edu

ENROLLMENT REQUIREMENTS

Campus program

18+ hrs = over load
12-18 hrs = full time
9-11 hrs = ¾ time
6-8 hrs = ½ time

Woods Online@SMWC

12 hrs = full time
9-11 hrs = ¾ time
6-8 hrs = ½ time

Graduate program

MLD
6 hrs per cohort/18 hrs per semester = full time
3 hrs per cohort/9 hrs per semester = ½ time

MAMT, MAAT
3 hours = ½ time
6 hours = full time

ADMINISTRATIVE CAPABILITY

Saint Mary-of-the-Woods College Financial Aid Office administers the Title IV programs in accordance with all applicable statutory and regulatory provisions (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
  - Perkins Loan Master Promissory Note
  - Scholarship checks
  - Apply student aid to their account; issue 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 to student accounts.

PROCESSES & PROCEDURES

Electronic Processes

Saint Mary-of-the-Woods College Financial Aid Office participates in the electronic processes identified by ED. Everything processed is electronic including; SARS (student/parent pin numbers), FISAP, loans, and MPN's.

The Financial Aid Office allows, and encourages, students to file and sign their FAFSA's electronically and use the IRS DRT (Data Retrieval Tool). This can be done by going to www.fafsa.gov and requesting a pin number prior to filing the FAFSA.

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 internal audit review in June each year.

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 & 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 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 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

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 and Federal Perkins Loan information.

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

Program-specific reporting, such as Enrollment Reporting for FFEL/Direct Lending 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 CampusVue/EDconnect and is then reported to COD.

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 CampusVue via daily>Financial Aid>Import data COD. A report is created from CampusVue (COD Disbursement Analysis) and is used to reconcile COD disbursements with CampusVue disbursements. Amounts disbursed via CampusVue to the student ledger will be matched against disbursements made via COD.

The report is reviewed by the Director of Financial Aid and any discrepancies will be corrected via CampusVue or COD. This report will be considered "final" and the Director will electronically initial and date the report. The balanced report will be sent to the Chief Financial Officer (CFO) and Associate Controller to assist in the reconciliation of the general ledger. 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 CampusVue and reported on the Electronic Statement of Accounts from COD.

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

The report is reviewed by the Director of Financial Aid and any discrepancies will be corrected via CampusVue or COD. This report will be considered "final" and the Director will electronically initial and date the report. The balanced report will be sent to the Chief Financial Officer (CFO) and Associate Controller to assist in the reconciliation of the general ledger. 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 CampusVue and reported on the Electronic Statement of Accounts from COD.

Federal TEACH grant – A report is created from CampusVue (COD Disbursement Analysis) and is used to reconcile COD disbursements with CampusVue disbursements. Amounts disbursed via CampusVue to the student ledger will be matched against disbursements made via COD.

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

SSACI awards – The Director of Financial Aid will run a report from CampusVue indicating the amount disbursed for each SSACI award.

The director will reconcile the amount disbursed per the CampusVue report with the amount disbursed via CHE via XGrads. Any discrepancies will be adjusted to the CampusVue software and communicated to the Business Office via batch for posting.

SSACI reconciliations are time sensitive and monitored closely for deadlines.

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

A Financial Aid staff member will compare the fund amounts listed in CampusVue 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 CampusVue, listing the named awards and send to the Advancement Office.

Once the final endowment financial reports are available, the Controller will send a current endowment report to the Financial Aid Office and the information will be reviewed again for accuracy. Any funds with negative amounts will be converted to named endowments that have funds available.

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
- 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
- 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. For Indiana students to be considered for state aid, they must file by the required deadline date, March 10. 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, Perkins, 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.

PREPARATORY COURSEWORK

A student may apply for a Stafford 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, he 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 he is only taking them to raise his GPA in order to be admitted, he 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 she completes the remedial work.

However, if the student is admitted into an eligible program and takes remedial coursework within that program, he can be considered a regular student, even if he 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 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 her 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 that 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 can't 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 don't 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.

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 then imported into CampusVue and reviewed for verification or conflicting information. If a student is selected for verification they must complete the appropriate forms prior to being awarded.

DEADLINES

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

- For Title IV campus-based funds the deadline is prior to the end of the academic year (June 30th)
- The last date which Federal Pell Grant output documents can be accepted is prior to the last day of the semester.
- The last date by which federal loans can be processed to ensure compliance with cash management regulations and guaranty agency rules is prior to the last day of the semester.
- Deadlines for submission of all applications and forms (e.g., institutional forms, verification worksheets, etc.) is after three letters of request for the paperwork have been sent with no reply (typically 6 to 8 weeks after the first letter has been sent)
- Verification deadlines follow the same guidelines for submission of all applications and forms with the three letter process. No aid will be disbursed to students in verification status or with conflicting information.
- State grant program deadlines is March 10th

Students are informed of deadlines by institutional e-mails, posters, flyers in the dorms, and electronic notices sent by the Department of Education and Indiana.

Review of Subsequent ISIR Transactions – Post-screening

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

The review of subsequent transaction includes:

- Items reviewed include:
  - Verification
  - "C" code problems
  - Unauthorized student changes
  - Social Security problems

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 Student Aid Reports 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 that information to that provided on the Student Aid Report. If there are no changes/corrections we will proceed with awarding the grants/loans to the students Financial Aid package. If there are discrepancies we will make the necessary corrections electronically to CPS (Central Processing Service) and when the corrected Student Aid Report is imported it is reviewed. That transaction will be used to determine awarding grants/loans to the students Financial Aid packaging.

PLEASE NOTE: No Federal or State grants/loans will be disbursed until all requested documents have been received and the Student Aid Report 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.

- When ISIR records are imported into the student system, the system identifies those applicants records that have been selected for verification by reading comment codes and verification flags whether 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 PROCEDURE & 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 mail, email and their student portal. Once documents are received they are verified and then put in the student's file. 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 six to eight 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, and
- certain untaxed income and benefits
- Food stamps and child support paid
- Educational credits/deductions
- If a student's marital status changes this may require changes to the FAFSA. We will then 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, only in that the independent student only has 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 and alternative tax documents. If the student/spouse or parents have filed an extension then 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).

Once the requested verification paperwork is received, the following are checked for the student and/or parents:

- The number of family members in the household
- The number of family members in college
- Tax forms completed
- Adjusted Gross Income
- Taxes paid
- Exemptions
- All questions pertaining to untaxed income & exclusions.

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 their verification process and award the student as needed.

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 a revised award letter noting the change(s).

VERIFICATION EXCLUSION:

- Please refer to the Federal Student Handbook for a list of exclusions.

PROFESSIONAL JUDGMENT

PJ Authority & Individuals Who May Exercise It

The Director and FA staff have the authority to exercise professional judgment. Professional judgment can be exercised after verification and any conflicting/inconsistent information has been resolved.

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 Actions

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
- Students 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.

NOTE: CHE (Indiana Commission for Higher Education) will only acknowledge Professional Judgments as a result of death of a parent or spouse or medical reasons.

Request for PJ Consideration

- Students and parents may submit requests in writing complete with signature
- Any supporting documentation must be received 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.

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 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 2011-2012, 2012-2013 & 2013-2014), the student received a Pell Grant at the institution.

- 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 check with the Registrar to review the most recent transcripts on file (if applicable) **OR**
- The student must provide an unofficial transcript from the institutions reporting the Pell

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 2011-2012, 2012-2013 7 2013-14). Using information from the National Student Loan Data System (NSLDS), the institution must identify the institutions where the student received Pell grant funding over the past three years.

- The student must provide an unofficial transcript from the institutions reporting the Pell 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 return for their next semester. In some cases a student can use their 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 awards are determined by the Office of Admissions. These awards are based on the student's academic performance and test scores. Once the award is determined this information is conveyed to the Office of Financial Aid to be added to the students Award Letter. A students merit 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.

Endowments:

The Advancement/Development Office provides a list of endowed scholarships and the criteria needed in order to be awarded 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 by an award letter if they receive an endowed scholarship and that 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.

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 Financial Aid Office. 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 for posting. The scholarships or payments are added to the students packaging and reviewed for over-awarding and over-budgeting.

Copies of the transactions are kept in the student's file for a period of (3) academic years.

Federal & State grants:

Pell grant – This award is a need based grant and is calculated by using the student/parents 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) then the Pell grant will be added to the students Award Letter.

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 that Indiana students file the FAFSA prior to the March 10th 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, 21st Century Award, Part-time, Mitch Daniels Early Graduation and the Teacher Minority awards. Once the Student Aid Report is finalized from verification (if selected) then the awards will be added to the students Award Letter. The state grants are tuition grants and in combination with other scholarships/grants/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 associates or first bachelors 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:

The "Schedule of Awards (State Financial Aid Award menu)" was adopted by the Commission on February 13, 2014. The new legislation made several changes to the criteria of awarding state grants.

The new criteria now:

- Establish awards based on Expected Family Contribution levels for all students. (This will discontinue awards based on Parental Contribution for dependent students.)
- Establish larger awards for students who complete 30 credit hours (or the equivalent), 60 credit hours (or the equivalent), or 90 credit hours (or the equivalent) in the prior academic year ("on-time award") than for students who complete at least 24/48/72 credit hours but less than 30/60/90 credit hours ("full-time award").

IC 21-12-1.7-4 also requires that the Commission establish incentive awards for students who:

- Are "academic honors," which 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)
- Received an associate degree prior to enrolling in a baccalaureate program; or
- Made "accelerated progress" during the recipients' most recently concluded academic year. 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.
- 21st 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 21st Century award the student could be eligible to receive the "Full-time' award.
- 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 is a need based grant and is awarded to undergraduate students with the highest need and receiving a Pell grant. The school is awarded a "pool" of funds and those are distributed to these students. Once the Student Aid Report is finalized from verification (if selected) then the FSEOG will be added to the students Award Letter. This grant in combination with other scholarships/grants/loans cannot exceed the schools COA.

TEACH (Teacher Education Assistance for College and Higher Education)

The Teacher Education Assistance for College and Higher Education (TEACH) Grant Program provides up to $3,960 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 that 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

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 that 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.

DISBURSING FWS FUNDS TO PAY CURRENT INSTITUTIONAL CHARGES

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.

DIRECT LOANS –

Entrance Counseling: All first time borrowers must complete Entrance counseling prior to receiving loan funds. Please visit the website at www.studentloans.gov to complete this process prior to completing your MPN (Master Promissory Note).

MPN (Master Promissory Note):
Student borrowers must complete a MPN (Master Promissory Note) before any funds can be disbursed. You can complete this process by visiting: www.studentloans.gov. The student's MPN is good for 10 years unless they transferred from another school or did not utilize the MPN for one year from the date they signed their prior MPN.

PLUS loans:
Parent borrowers must complete an application and an MPN (Master Promissory Note) by going to: www.studentloans.gov. If parents are denied the PLUS loan then the student can receive additional eligibility in the unsubsidized loan program based on grade level. This process must be completed each year by the parent's for that academic year or if they are requesting an additional loan during the current academic year.

The Financial Aid Office certifies the loans for all students by exporting origination/disbursement files to COD for processing.

The Financial Aid Office is responsible for the disbursement process. Once a loan has been disbursed, the Business Office receives the aid and applies it to the students account. If any additional aid is left a stipend is issued to the student.

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 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 and is enrolled and has begun attending 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 CampusVue to COD via EDconnect. Once the file is returned from COD via the SAIG mailbox that file is imported into CampusVue. 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 CampusVue to COD via EDconnect.

When the file is returned from COD via SAIG mailbox it is imported into CampusVue 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 (typically on the 11th day of the semester). 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.

Disbursement 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 then informed of the disbursement schedule by COD. Late disbursements are authorized and reconciled by the Business Office and any leftover financial aid is applied to the students account and federal regulations are followed.

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.).

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 students 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.

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 in which active confirmation is used. As such, consistent with 34 CFR § 668.165(a), SMWC issues a notice to students within 7 days of crediting a Federal Direct Loan and Federal Perkins Loan to the student's account, advising the student of the disbursement and providing the student with 30 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 Perkins Loan award.

TEACH Grants require an active confirmation process and the student must accept the award prior to disbursement. SMWC will issue a notice to students usually within 7 days but no later than 30 days of crediting a TEACH Grant disbursement to the student's account, advising the student of the disbursement of the previously accepted award and providing the student with 14 days from the date of the disbursement notice to cancel the applicable disbursement.

Procedure

The SMWC Business Office will run a report each week to identify the students who have been disbursed any type of Federal loan during the prior seven days. Once the report is run, an email will be sent by close of business on the same day to each student with such a disbursement advising the student that a loan has been disbursed to their student account and of the steps to take to cancel the loan(s) within the applicable number of days.

The Business Office will randomly select students who were scheduled to receive a Federal loan disbursement from each disbursement batch to determine if the notification policy and procedure listed above is being followed.

Process

1. The Business Office will run an Access query report each Friday to determine which students have had a loan applied to their account within the last seven days. The name of the Access query report is "Notice List for Loans."
2. The "Notice List for Loans" query report will list the student name and ID number, loan type, amount of loan and the student SMWC email account of all students with Federal loan disbursements in the prior week.
3. The Business Office will send an email to each student identified on the report by close of business on the day the report is run to inform the student of their Federal loan disbursement and right to cancel within 30 days (14 days for TEACH Grants). The template for this email is called "Loan Notification Letter" and a copy of it is attached as Exhibit A.
4. The original email will be saved within the Business Office email account. In addition, a hard copy of the original email will be printed and kept in a the student's file for a minimum of three years after the completion of the award year or longer if required by applicable U.S. Department of Education regulations.

   The Controller or Associate Controller will review a randomly selected sample of 10 Federal loan recipients after each disbursement notification batch is generated to ensure the policy and procedure stated above is followed. The random selection will be made from the disbursement report prepared by the Financial Aid Office to identify students who are scheduled to receive disbursements. SMWC will verify that Federal loan funds were received and disbursed, and that the student was notified of such disbursement. If SMWC detects any noncompliance, it will be corrected immediately. If noncompliance occurs at a rate of 10% or greater, additional testing, staff training, and policy reassessment may result.

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 provide the Financial Aid Office with a listing of graduates for each semester. In addition, the Financial Aid Office will run the "Potential Graduate" report in CampusVue at the beginning and end of each semester. The Financial Aid Office will identify student borrowers who received loan disbursements at any time during their enrollment at SMWC. Students on this reports will be placed into a student group for monitoring/tracking.

The Financial Aid Office will mail and email each student borrower exit materials within 30 days of the date of the student's separation from SMWC. The exit information will also be uploaded to the student's portal (when the portal capabilities are available). The portal will also require the student to acknowledge that she/he has received the exit counseling notice. This does not indicate the exit counseling has been completed. That process must be completed through the required Dept. of ED website.

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.

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 student's 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 will be sent Exit Counseling information.

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 CampusVue, 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 CampusVue, 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/WOL students who choose to not enroll in one module per semester.

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

The Financial Aid Office will mail and email each student borrower exit materials within 30 days of the date of the student's separation from SMWC. The exit information will also be uploaded to the student's portal (when the portal capabilities are available). The portal will also require the student to acknowledge that she/he has received the exit counseling notice. This does not indicate the exit counseling has been completed. That process must be completed through the required Dept. of ED website.

The exit packet will consist of the following documents:

1. Exit letter directing the student to the studentloans.ed.gov website
2. *Exit Counseling Guide for Federal Student Loan Borrowers* brochure published by the U.S. Department of Education.

A copy of the exit letter with the mailing and emailing dates will be retained in the student file.

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 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

An award letter 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 award letter 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 of decline any part of the offered aid.

Award letters will be sent to "new" Campus students via USPS and the student's SMWC email account. Award letters will be sent to Campus students beginning mid-March and revised as needed based on updated information from other departments, outside organizations and/or changes to the FAFSA.

Award letters for all returning Campus students will emailed only to their SMWC email account. The award letters will be available mid- April. Award letters will be revised as needed based on updated information from other departments, outside organizations and/or changes to the FAFSA.

Award letters will be sent to all "new" Woods Online and Graduate students via USPS and the student's SMWC email account. Award letters will be sent to students each week or when updated reports are available for the Financial Aid office. Award letters will be revised as needed based on updated information from other departments, outside organizations and/or changes to the FAFSA.

Award letters for all returning Woods Online and Graduate students will be sent to their SMWC email account. Award letters will be sent to students each week or when updated reports are available for the Financial Aid office. Award letters will be revised as needed based on updated information from other departments, outside organizations and/or changes to the FAFSA.

Award Package 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

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 FAFS or 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

STUDENT REGISTRATION:

Students are packaged by a list provided by each program administrator. The Financial Aid office will determine if the students are 'clear" to register based on financial aid status. The list is then sent to the appropriate departments to streamline the student enrollment process.

PROVISIONS FOR BOOKS & SUPPLIES:

- Students that have the "cleared" status in the Financial Aid Office and Business Office will be allowed to purchase books and supplies (if applicable) 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.

- 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. If SMWC is either the "home" or "host" school the student must purchase books and supplies using an SMWC 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 that the Financial Aid Office constructs budgets includes:

- Campus undergraduates
- Off-campus undergraduates
- Resident Advisors (R.A.)
- Graduate students
- Woods Online
- Students in study abroad programs
  - During summer – Sig. loans
  - During the academic year – campus budget

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 typically increased by 2% to 3% each year.
- Other methods for deriving costs include looking at the City-Data (Terre Haute) website, Security Administration for cost of living adjustments and the College Board.

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
- Child care expenses
- Cooperative education program expenses

Once a budget is complete, it is no longer adjusted without proper documentation such as a Professional Judgment.

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., child care, 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 withdrawals 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.

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, <u>even if he/she does not complete any work</u> on the courses.

CAMPUS Program Refund Policy –

If written notification is received one week before registration, a full refund will be given for all tuition, fees, room and board charges. If a student withdraws after the semester starts, refunds for room and board charges must be approved by the Director of Campus Life. Refunds will be prorated on a weekly basis, less a $50 withdrawal fee. Tuition, fees and financial aid will also be prorated. Withdrawal after 50% of the semester will result in 100% of charges. If a student leaves due to a disciplinary action, refunds may not be approved

WOL/Grad Refund Policy- for 2014-15

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

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

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

If the course is dropped:	This will happen:
1st Week: Days 1 –10	Student will receive 100% credit for tuition for the course dropped less a $10.00 drop fee per course.
After day 10:	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 <u>from the start date of the semester</u>, 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

- 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 (2nd 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. 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** – Student will be refunded for the third module only. Financial Aid will adjust "credit hours enrolled" to reflect the new enrollment status. 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.

Summer Awards
the following elements are included:

- A 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 FUNDS

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 e 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 us 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 students 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 CampusVue to determine the students GPA and which class is to be used for the last academic event. The report from CampusVue 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 CampusVue, the staff member will go to: academic records>final grades and review the class with the recent date that is entered in the "numeric grade" field. The layout for the date will be state as (918.00 for Sept. 18th).

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 that 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).
- 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 that 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. That 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 CampusVue software. The Financial Aid office will create a disbursement file to remove the disbursements from CampusVue 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 CampusVue 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. That 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 CampusVue software. The Financial Aid office will create a disbursement file to remove the disbursements from CampusVue 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 CampusVue 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 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 10 days of the period of enrollment will be "Administratively Withdrawn".

Procedures

The Financial Aid office will receive notification from the Registrar's Office if faculty 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 CampusVue 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 (3) weeks of the period of enrollment.
2. The Registrar's office will monitor that period of enrollment to insure the faculty has submitted a "P" indicator identifying that the student has submitted an assignment(s).
3. At the end of the three week 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 CampusVue 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 CampusVue software.
7. The students account is noted.

Students who did not begin attendance

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 CampusVue system.
2. Students are monitored by the faculty 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 CampusVue 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 CampusVue 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 <u>do not</u> 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 40th 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

An 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 an LOA from their Program Director or the Vice President for Academic Affairs. The length of an 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 an 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 an 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, an 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 at 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).

Post-withdrawal Disbursements

A post-withdrawal disbursement occurs when a student has completed 60% of his/her period of enrollment.

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 first; paid to outstanding institutional charges being paid directly to the student, etc. The Business Office has 14 days to return any post-withdrawal funds to the student or parent.

Example of Return to Lender Calculation:

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.

Returning Unearned Funds

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.

Over-awards

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 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 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 CampusVue.
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 receive financial assistance at 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 insure students are maintaining SAP. Campus students using financial aid for summer classes will have their SAP reviewed after the summer semester has ended.

CUMULATIVE GRADE POINT AVERAGE

Undergraduate, financial aid recipients 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. Also, the transfer students' cumulative GPA from all previously attended colleges must meet 2.0 or they will be on financial aid warning (restriction). A students GPA is affected by Incompletes, withdrawals and repetitions.

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

TERM GPA & COMPLETION RATE

All students who receive financial aid will be reviewed each term, module or semester for SAP. Students are required to complete 50% of all hours attempted and maintain a minimum GPA of 2.0 per term, module or semester.

SUCESSFUL COMPLETION RATE

Financial aid recipients are required to complete their degree within a maximum timeframe (*quantitative* standard). This means student that are enrolled at ½ time status are required to successfully complete 50% of all credits attempted each semester. A full time student 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 s 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 60 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.

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 50% completion rate must make up the shortage in the next semester in addition to completing 50% of other credit hours attempted. Therefore, students must successfully complete 50% 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

Students who fail to establish satisfactory academic progress after being on warning for one semester will have their financial aid eligibility suspended. A student must appeal this decision to have their aid reinstated. 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.

An appeal will not be approved unless the student's next semester will allow him/her to meet SAP standards as set forth by the Department of Education. If it is determined that the student cannot achieve the SAP standards in their next semester then 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.

If students do not achieve the goals established in the Academic Plan then 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.

REPEATED COURSEWORK

For satisfactory academic progress purposes, each time a course is taken counts as an attempt; only the first time a passing grade is received is counted as completion.

- Student may repeat previously passed course once
- May repeat failed course until it is passed while maintaining SAP standards.

INCOMPLETES:

A student with a valid reason for not finishing course requirements on schedule may be granted

additional time by the instructor to complete the course. The student must have completed at least 50% of the course work and no more than 50% of a student's courses may be extended at one time. 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 of "F." A request by a Woods Online student in a 16 week course for an extension of one to three months must include the instructor's approval and be emailed or sent in writing to the Office of the Registrar by the last day of the semester. A fee for extensions is required.

IMPORTANT:
*If a student withdrawals from all classes the Financial Aid Office will complete an R2T4 and recalculate aid earned during that semester/module***.**

TRANSFERS:

SMWC will use attempted and credits earned from the student's transcripts for Satisfactory Academic Progress purposes. Students must provide a final, official transcript if a degree is in progress. Failure to provide the final transcript will result in a loss of Institutional scholarships dependent on graduation status.

GRADUATE STUDENTS:

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

ACADEMIC SCHOLARSHIP RECIPIENTS

Students who receive Academic 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 term, module or semester. 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. If they fail to meet scholarship criteria at the end of the suspension period, his/her academic scholarship will not be renewed and will not be reinstated at a later date.

If the student fails to meet the minimum cumulative grade point average requirements due to mitigating circumstances such as illness, family circumstances, or other unforeseen conditions beyond the student's control, students have one chance to make a written appeal to the Financial Aid Committee. If the appeal is granted, the student may receive the scholarship one additional semester and must meet the minimum cumulative grade point average or the scholarship will not be reinstated. The student will only have one chance to appeal.

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 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 FAFASA 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 already on aid and are accepted into a study abroad program, the Office of Financial Aid will automatically adjust your financial aid budget, need and award to reflect the cost of your study abroad program. 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 accepted to study abroad by meeting with her academic advisor and approval from the Vice President of Academic Affairs. Students will be responsible for all upfront, initial costs such as travel, insurance, etc.

TITLE IV FRAUD

Student fraud

If a student is suspected of Title IV 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) then an investigation will be initiated.

Step 1:
If…the student's application has been selected for verification, then the counselor reviews all documents [such as the ISIR, tax forms, etc]. If the counselor suspects fraudulent information (e.g., signatures, on the verification worksheet do not match those of the previous year).
Step 2:
Then…the counselor refers the file to the financial aid Director for review.
Step 3:
If…after the financial aid Director reviews the document(s), he or she suspect's fraud.
Step 4
Then…the financial aid Director contacts the school's legal counsel (attorney on retainer).
Step 5
If…the schools legal counsel (attorney on retainer) feels there is suspected fraud.
Step 6
Then…he or she contacts OIG by calling 1-800-MIS-USED.

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 in June 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.
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.

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