



FINANCIAL ASSISTANCE OFFICE

POLICIES & PROCEDURES
MANUAL

2014 - 2015

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POLICIES & PROCEDURES MANUAL: SECTION BY SECTION

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SECTION 1: INTRODUCTION TO FINANCIAL AID POLICIES AND PROCEDURES

1.1 Introduction to the IHCC Financial Assistance Office

Resources

The Financial Assistance Office at Indian Hills Community College is committed to providing a high level of service and support to the students of IHCC. By providing this support we allow students to achieve their educational goals through the removal of any financial barriers or obstacles on their road toward attending college.

Financial Assistance Offices are located in Bennett Student Services Center on the Ottumwa Campus and in the Main Administration Building on the Centerville Campus. The normal hours of operation are 7:15 AM – 4:45 PM Monday through Thursday. The offices can be reached by calling (641) 683-5262, e-mailing a question to onestop@indianhills.edu, or visiting us on the web at: <http://www.indianhills.edu/finaid/index.html>

1.2 Purpose & Philosophy of the Financial Aid Office

It is the mission of the Financial Assistance Office to provide the financial resources for students to attend Indian Hills Community College, and in doing so exhibit the highest level of quality and expertise in the service we provide. This mission adheres to and supports Indian Hills Community College's mission of being dedicated to excellence in educational opportunity, economic development, cultural understanding, and social enrichment.

The Financial Assistance Office envisions itself as a student-centered department which consistently strives to improve the level of service provided to IHCC's diverse student population.

The Financial Assistance Office at Indian Hills Community College was established in 1967 to coordinate all financial assistance offered by the school (with the exception of scholarships administered by the IHCC Foundation Office), and to ensure that established principles, policies, and procedures are observed during the administration of student aid programs at Indian Hills Community College.

1.3 Policies & Procedures Development Responsibilities

At Indian Hills Community College modifications and additions to institutional financial assistance policy is recommended by the Financial Assistance Office Director, and must be approved by the Dean of Student Services.

1.3.1 Responsible Personnel

It is the responsibility of the Financial Assistance Office to submit regular updates to the information contained in this policies and procedures manual. Indian Hills Community College's Financial Assistance Policies and Procedures manual will be evaluated and updated at a minimum of a yearly basis.

1.3.2 Documents & Methods

Indian Hills Community College utilizes multiple sources for new information pertaining to financial aid regulations, laws, and Department of Education (ED) policy guidance. ED publications and guidance is kept either via hardcopy or electronic means at the Ottumwa campus by the respective financial assistance staff members. Whenever possible federal and state publications will be accessed electronically.

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In accordance with federal requirements, each financial assistance office has access to the world wide web and the ED's Information for Financial Aid Professionals (IFAP) website. The Financial Assistance Office Director and Dean of Student Services also have subscriptions to NASFAA's *Today's News* and the *NASFAA Newsletter* (which announce policy and procedure guidance on a daily basis).

Publications utilized by each financial aid office include (but are not limited to):

- *Federal Registers* – both Notices of Proposed Rulemaking (NPRMs) and Final Rules
- *The Audit Guide* or appropriate OMB circulars
- *Federal Student Aid Handbook*
- *The Blue Book*
- Dear Colleague/Partner Letters

- Policy Bulletins
- Electronic Announcements
- The *Common Manual* published by the National Council for Higher Education Loan Programs (NCHELP)
- NASFAA *Encyclopedia*
- Newsletters from professional associations (state, regional, and national, such as NASFAA and IASFAA)

Hardcopies of each publication may not be available at the Financial Aid Office location. However, each financial assistance office staff member is responsible to access each publication via electronic means.

1.4 Student Attendance

Students are expected to be present at all class sessions. It is the students' responsibility to read and understand the class attendance policy or online course participation expectations that will be defined in the syllabus for each course. It is the faculty member's responsibility to define attendance or participation requirements and to monitor and record the students' fulfillment of these requirements.

- To be eligible for federal financial aid (Title IV), federal regulations require that students receiving financial aid establish attendance/participation in coursework each term to be eligible for financial aid.
- Class instructors will report student class attendance/participation through the [Census Date](#) for the course. Instructors will provide an attendance policy for each course. The Census Date is typically the 8th day of term.
- Students who have not established attendance in any or all classes will have their Financial Aid eligibility adjusted.
- Once all attendance is recorded, students who have not attended or participated in ALL courses for which they are registered will be de-registered from all. The Office of the Registrar will notify the Financial Assistance Office of all students de-registered in order to have federal, state and institutional student aid awards recalculated. Students who fail to attend any classes will be ineligible for Title IV financial aid.
- If a student has been reported as not-attending in all, but one course, the student will remain enrolled in the course and may incur a balance owed to Indian Hills.

- Financial Aid eligibility is based on the course load of courses actually attended. If notification of non-attendance in any class is received at any time, the determination of federal financial aid eligibility will be re-evaluated for that term and may result in financial aid forfeiture and/or a balance due to the College
- If a student has been reported as not beginning attendance in a class due to an attendance reporting error, the student should contact the Registrar’s Office. The student will be responsible for contacting the instructor who reported their non-attendance. The instructor will then provide updated attendance information to the Registrar’s Office. The student will be notified through their Indian Hills e-mail account when a decision is made regarding their attendance. Once the enrollment issue is resolved, the student should also verify with the Financial Assistance Office, that their financial aid has been adjusted.

SECTION 2: ADMINISTRATIVE ORGANIZATION & OFFICE MANAGEMENT

2.1 Institutional & Divisional Structure

Resources

Indian Hills Community College staffs the Financial Assistance Office at an adequate level to provide maximum service to the student population of the college. The community college staffs a Financial Aid Director in Ottumwa, along with Financial Assistance Advisors, a Computer Data Entry staff member, a Verification Specialist, and a part-time Enrollment Specialist. All federal state and local student financial aid resources should be coordinated through the Financial Assistance Office in Ottumwa.

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Indian Hills Community College divides the functions of authorizing payments and disbursing or delivering funds so that no office has responsibility for both functions with respect to any particular student awarded aid. The functions associated with the authorizing of payments rests with the Financial Assistance Director. The responsibility for disbursing or delivering funds rests with the Business Office of Indian Hills Community College, located on the Ottumwa campus. The two functions are carried out by at least two organizationally independent individuals who are not members of the same family or who do not together exercise substantial control over the institution.

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The Financial Assistance Office of IHCC coordinates the disbursing and delivering of funds through IHCC’s Business Office. The Financial Assistance Director works in direct contact with the Controller to ensure the timely delivery of Title IV aid.

2.2 Financial Aid Office Structure & Position Responsibilities

Financial Aid Director:

- Supervises all functions of the IHCC Financial Aid Office.
- Responsible with the Dean of Student Services for all financial aid policy development.
- Implements, organizes and maintains financial assistance functions at the Ottumwa campus and other college locations as required. Advises and assists credit-seeking students in financial aid processes.

Financial Assistance Advisor:

- Implements, organizes and maintains financial aid functions at the Ottumwa campus and other college locations as assigned.
- Advises and assists credit-seeking students in financial aid processes.
- Completes other projects as assigned by the Financial Assistance Director

Verification Specialist (Ottumwa Campus):

- Advises and assists credit-seeking students in financial aid processes.
- Serves as the primary processor of verification documents received from students attending the West Burlington Campus.

Computer Data Entry (Ottumwa Campus):

- Manages the SAIG mailbox communications.
- Completes ISIR imports
- Coordinates with Direct Loan services in regards to default prevention, skip tracing, etc.
- Assists with the data entry of all collected documents for verification, including scanning into digital imaging system.

Integrated Student Services Specialists (Ottumwa Campus):

- Assists with the customer service of all credit-seeking students in regards to their financial assistance needs

The functions of Indian Hills Community College's Financial Aid Office include:

An essential function of the Financial Assistance Office is the dissemination of financial aid information to parents, potential students, high schools, and the entire college community. Tools utilized for dissemination include activities such as workshops with high school counselors, speaker presentations to community groups and college classrooms, high school visits, press releases, college catalogs, and informational brochures. Financial assistance information is also covered during IHCC orientation sessions and Explore Hills presentations.

The Financial Assistance Office communicates the concerns of the financial aid community to the appropriate federal, state, local, and college officials in regards to the decisions affecting the financial aid process. This includes communication through participation on committees or regional panels, attending workshops, and completing applications for federal funds to the appropriate federal and state agencies. The Financial Assistance Office makes every effort to maintain awareness of all state and federal decisions that affect financial aid programs, or provides insight into the eligibility criteria of such programs.

IHCC's Financial Assistance Office has a responsibility to maintain effective articulation with the Financial Aid Offices of upper division colleges to assure continuity of assistance for the community college student.

The Financial Assistance Office's Maintenance and Expansion of Existing Programs and Solicitation of New Programs results in a comprehensive financial aid program which would include: scholarships, loans, grants, and part-time employment that would assure IHCC's students are not denied a college education due to inadequate financial resources.

The Financial Assistance Office has a responsibility to ensure the college community, and specifically the Student Services Division, is aware of financial aid procedures, responsibilities, and available resources.

2.2.1 Personnel Policies

Personnel policies are outlined by the direction of the Human Resources Department of Indian Hills Community College.

Personnel procedures are outlined by the direction of the Human Resources Department of Indian Hills Community College.

2.3 Frequent Contact Information

Financial Assistance Office – Ottumwa Campus
625 Indian Hills Dr.
Ottumwa, Iowa 52501
(641) 683-5262
Toll Free 1-800-726-2585
ext. 5262
onestop@indianhills.edu

2.4 General Aid Office Administration

Indian Hills Community College’s Financial Aid Office operates according to the college’s hours of operation. In general, the department is open from 7:15AM to 4:45PM Monday through Thursday.

2.4.1 Accommodations for Disabilities

The Financial Assistance Office follows guidance set forth by the college in servicing students with disabilities, including compliance with the Americans with Disabilities Act (ADA).

28 CFR Part 36

2.4.2 Appointments with Staff

The Financial Assistance Director and Financial Assistance Advisors of Indian Hills Community College are available for appointments during the timeframe outlined within IHCC’s normal hours of operations. Appointments are based on the availability of the individual Financial Assistance Director/Advisor as indicated on their MS Outlook electronic calendar. It is the responsibility of each Financial Assistance Office staff member to update his or her electronic calendar on a continual basis.

All staff members of IHCC’s Financial Assistance Office will be provided access (via MS Outlook) to the electronic calendars maintained by each Financial Assistance Office staff member. Each appointment requested by a student will be scheduled for no less than one half hour, and no greater than one hour. Appointments can be scheduled by contacting IHCC’s Financial Assistance Office utilizing the contact information provided in section 2.3 of this manual. Walk in appointments can be accepted by the Integrated Student Services Specialists. If the student requires additional assistance, they will work to schedule an appointment with the Director/Advisor as their schedule is available.

2.4.3 Treatment of Correspondence/Forms

It is the responsibility of the Financial Assistance Office staff to properly disseminate and process written correspondence sent and received by the Financial Assistance Office. IHCC's Financial Assistance Office receives correspondence primarily in the form of student tracking letters. In addition, correspondence is received concerning student loan requests, scholarship and sponsorships awards, regulatory guidance, and interdepartmental communications.

All mail received by the Financial Assistance Office will be reviewed and opened by the Financial Assistance Office staff at each location on a daily basis. The proper dissemination of mailed correspondence will be made following the review of the mail received.

Financial Assistance documents and forms completed by the student will be logged into Datatel by the staff of each office. This responsibility primary rests with the Computer Data Entry or Verification Specialist, located in Ottumwa. After each completed document or form is processed, the letter will be kept in the student's financial aid file electronically within IHCC's digital imaging system and can be accessed on either campus.

At the direction of the Controller, Business Office staff members will be responsible to process scholarship and sponsorships correspondence in Datatel. After each scholarship and sponsorship is processed, the correspondence will be kept in an award-year specific binder at the Ottumwa Campus.

2.4.4 Telephone

Telephone calls to IHCC's Financial Assistance Advisors are routed through an automatic call distribution system to the Integrated Student Service Specialists. All printed material and publication of the financial aid telephone contact information concerning each campus will reference the extensions at which each Financial Assistance Advisor is located. In addition, IHCC's Financial Assistance Director/Advisors are provided a direct line with which to be contacted.

2.4.5 Confidentiality of Student Records

Indian Hills Community College retains the official academic record (transcript) of enrollment and credits earned in Indian Hills Community College credit programs in perpetuity. All other

student record documents will be destroyed three years after the student's last enrollment at Indian Hills. Students who believe there is an inaccuracy in their official academic records (transcript) must notify the Registrar's office immediately. The records contain information about the student and their education and may include, but are not limited to, the following types of records: identification data, attendance data, record of achievement, family background data, aptitude tests, educational and vocational plans, honors and activities, objective counselor or teacher ratings and observations, and external agency reports.

Any student objecting to the public release of such information must file a written objection with the Registrar within fifteen school days following the first day of classes attended. This written objection is valid for one calendar year from the date of the objections and must be renewed if desired.

IHCC's Financial Assistance Office operates in accordance to the established rules outlined by FERPA regulations, which govern the disclosure of student information to parties other than the student. The regulation provides a number of conditions under which personal identifiable information from a student's education record may be disclosed without the student's prior written consent.

2.4.6 Securing of Student Financial Aid Records

Student financial aid records are maintained in a digital imaging system that is protected by passwords of staff members that have security clearance to view scanned documents. When documents are scanned, hard copies are kept until the student's file is considered complete and then destroyed.

2.5 Records Management & Retention

Indian Hills Community College's Financial Assistance Office establishes and maintains on a current basis applications submitted for Federal Student Aid program funds. In addition, the office maintains program records as required under federal regulation.

Fiscal records, demonstrating the proper use of FSA funds, and Loan Program records are kept on a current basis.

IHCC's Registrar's Office keeps official academic records (transcripts) of enrollment and credit earned in the IHCC credit program in perpetuity.

2.6 Information Sharing & the Family Educational Rights and Privacy Act

34 CFR 99.34

Federal law sets certain conditions on the disclosure of personal information from records kept by schools that participate in the FSA programs. The relevant law is the Family Educational Rights and Privacy Act. IHCC's Financial Assistance Office may disclose personally identifiable information from an education record without the student's consent when disclosed:

- to other school officials, including teachers, within the school whom the school has determined to have legitimate educational interests; or,
- subject to the requirements of 34 CFR 99.34, to officials of another school, school system, or institution of postsecondary education where the student seeks or intends to enroll.

Disclosure may be made by IHCC's Financial Assistance Office if it is in connection with financial aid that the student has received or applied for. Such a disclosure will only be made if the student information is needed to determine the amount of the aid, the conditions for the aid, the student's eligibility for the aid, or to enforce the terms or conditions of the aid.

IHCC annually notifies students of their rights under FERPA as part of the institution's effort to disclose consumer information. Included within that notification are the procedures for exercising their rights to inspect and review education records. In the event personally identifiable information is disclosed to a party with legitimate interests in obtaining the information, documentation is maintained in the student record in Datatel (does not apply to school officials with a legitimate educational interest or to directory information).

2.6.1 Authorization Consent Form

An IHCC student may provide a signed and dated written consent to the Registrar's Office to disclose personally identifiable information from the student's education records.

The written consent must:

- state the purpose of the disclosure;
- specify the records that may be disclosed;
- identify the party or class of parties to whom the disclosure

may be made; and

- be signed and dated.
- The IHCC Registrar’s Office requires that the document be signed by the student with an IHCC staff member as a witness.

SECTION 3: FINANCIAL AID PROGRAMS

3.1 Institutional Eligibility Requirements

Indian Hills Community College is eligible to participate in Title IV programs by meeting the definition of an institution of higher education as defined by the US Department of Education.

Documentation that substantiates IHCC’s eligibility to participate in Title IV programs is located in the Financial Aid Office at the Ottumwa campus. IHCC makes accreditation and licensing information and documentation available to enrolled and prospective students upon request.

The Financial Assistance Director is responsible for updating information contained in IHCC’s institution eligibility application. Furthermore, the Financial Assistance Director is responsible to track the expiration of the PPA, and coordinates the recertification process.

3.1.1 Program Eligibility

IHCC is an institution of higher education (in addition to meeting all other eligibility requirements, including being a nonprofit school) because it offers a program that leads to an associate or professional degree.

IHCC also qualifies as an institution of higher education because it offers a program of at least two academic years in duration that is acceptable for full credit toward a bachelor’s degree, or because it offers a program of at least one academic year in duration that leads to a certificate, degree, or other recognized credential and prepares students for gainful employment in a recognized occupation.

IHCC is ultimately responsible for determining that a program is eligible. In addition to determining that the program meets the eligible program definition, IHCC makes certain the program is included under the notice of accreditation from a nationally recognized accrediting agency (unless the agency does not require that particular programs be accredited).

IHCC periodically undergoes recertification of its eligibility; the duration of eligibility is primarily linked to the expiration of the PPA.

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IHCC utilizes rule definitions within the Datatel system to identify students in eligible programs of study. Students identify themselves as degree seeking at IHCC by indicating such on the Application for Admissions form in the Educational Goals section. Students who do not certify that they are attending IHCC for the purposes of seeking a degree, or do not have an eligible program indicated as their major in the Datatel system, are not awarded financial aid.

IHCC's academic year for all credit hour students is defined as 36 weeks.

IHCC defines its Title IV academic year as 24 credit hours. Grade level progression is measured by the completion of 24 credit hours.

IHCC outlines its definition of a credit hour in line with the guidance set forth in 34 CFR 600.2, 602.24.

At IHCC (per Administrative Guideline 114), one semester hours is defined as:

1. 880 minutes of Lecture (breaks excluded) = 1 semester hour (State minimum = 800 minutes)
2. 1,760 minutes of Laboratory or Shop (breaks excluded) = 1 semester hour (State minimum = 1,600 minutes)
3. 2,640 minutes of clinical practice (breaks included) = 1 semester hour (State minimum = 2,400 minutes)
4. 3,520 minutes of work experience (breaks included) = 1 semester hour (State minimum = 3,200 minutes)
5. In compliance with 34 CFR 600.2 an appropriate amount of outside work will be included.

This is determined to be a reasonable equivalent to and the approximation of at least the amount of work expected in a Carnegie unit.

3.1.1.1 Evaluation of New Programs

New programs are added according to the procedures outlined in the FSA Manual, Volume 2; School Eligibility and Operations.

The Financial Assistance Director is responsible to identify and determine the eligibility of new programs. Before IHCC determines new programs to be eligible and disburses funds to enrolled students, the school must receive both the required state and accrediting agency approvals.

- The Financial Assistance Director and the Registrar

are voting members of the Academic Standards Committee at IHCC so they are aware of any suggested new programs.

3.1.2 Administrative Capability

3.1.2.1 Provisions

IHCC administers Title IV programs in accordance with all applicable statutory and regulatory provisions. IHCC maintains compliance with the administrative capability requirements of 34 CFR 668.16(o).

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3.1.2.2 Administration

IHCC has designated the Financial Assistance Director to be responsible for administering and coordinating the institution's financial aid programs.

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The Financial Assistance Director is the coordinating official, and is designated as the capable individual to administer the FSA programs and to coordinate aid from these programs with all other aid received by students attending the school. IHCC's operations are administered in a way that ensures all the information the school receives that might affect a student's FSA eligibility is communicated to the coordinating official and to the Financial Assistance Office.

IHCC utilizes a financial aid staff comprised of an adequate number of qualified persons to administer the Title IV programs. See section 2.2 of this manual.

3.1.2.3 Responsibilities of Institutional Offices

The Financial Assistance Director and at his/her direction the staff of the Financial Assistance Office, is responsible for the approval and authorizing payment of the Title IV programs. In addition the Financial Assistance Office is responsible for the preparation and delivery of reports to the Department of Education.

The Business Office is responsible for the disbursement and delivery of Title IV funds.

3.1.2.4 Separation of Duties

Administrative procedures for the federal student aid (FSA) programs at IHCC include an adequate system of internal checks and balances. This system separates the functions of authorizing payment and disbursing or delivering funds so

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that no one person or office exercises both functions for any student receiving FSA funds. These two functions are performed by individuals who are not members of the same family and who do not together exercise substantial control over the school.

3.1.2.5 Records

In accordance with federal regulation, IHCC establishes and maintains on a current basis any application the school submitted for FSA program funds. The documentation maintained on a current basis includes program records that document:

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- IHCC's eligibility to participate in the FSA programs,
- the FSA eligibility of the IHCC's programs of education,
- IHCC's administration of the FSA programs,
- IHCC's financial responsibility,
- information included in any application for FSA program funds, and
- IHCC's disbursement of FSA program funds.
- Fiscal records maintained on a current basis include:
 - financial records that reflect each FSA program transaction, and
 - general ledger control accounts and related subsidiary accounts that identify each FSA program transaction (separated from all other school financial activity).

IHCC maintains records for each FSA recipient that include, but are not limited to:

- Student Information Record (ISIR) used to determine a student's eligibility for FSA program funds (in electronic form)
- Application data submitted to the Department, lender, or guaranty agency by the school on behalf of the student or parent

- Documentation of each student's or parent borrower's eligibility for FSA program funds (e.g., records that demonstrate that the student has a high school diploma, GED, or the ability to benefit (for those grandfathered in))
- Documentation of all professional judgment decisions
- Financial aid history information for transfer students via NSLDS
- Cost of attendance information
- Documentation of a student's satisfactory academic progress (SAP)
- Documentation of student's program of study and the courses in which the student was enrolled
- Data used to establish student's admission, enrollment status, and period of enrollment
- Required student certification statements and supporting documentation
- Documents used to verify applicant data, and resolve conflicting information
- Documentation relating to each student's or parent borrower's receipt of FSA program funds, including but not limited to:
 - The amount of the grant, loan, or FWS award; its payment period; its loan period, if appropriate; and the calculations used to determine the amount of grant, loan, or FWS award;
 - The date and amount of each disbursement of grant or loan funds, and the date and amount of each payment of FWS wages;
 - The amount, date, and basis of the school's calculation of any refunds/returns or overpayments due to or on behalf of the student; and

- The payment of any refund/return or overpayment to the FSA program fund, a lender, or the Department, as appropriate.
- Documentation of and information collected at any initial or exit loan counseling required by applicable program regulations

3.1.2.6 Electronic Processes

IHCC’s Financial Assistance Office utilizes electronic processes that are required to be considered administratively capable of participating in federal student aid programs.

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It is the responsibility of the Financial Assistance Director as the Coordinating Official to ensure compliance with the administrative capability requirements.

3.1.2.7 Information Discrepancies

IHCC’s Financial Aid Office actively identifies and resolves discrepancies in all FSA-related information received by any IHCC office.

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At a minimum, active resolution includes:

- determining what information is correct, and
- documenting the school’s findings in the student’s electronic file.

As required under federal regulation, IHCC’s system includes a review of:

- All student aid applications, need analysis documents, MRRs, POPs from COD, Applications for the Admission/Program Changes, Registration Statements, and eligibility notification documents presented by or on behalf of each applicant;
- Any documents, including any copies of state and federal income tax returns, that are normally collected by the financial aid office to verify information received from the student or other sources; and
- Any other information submitted or normally

available to the school regarding a student's citizenship, previous educational experience, documentation of the student's social security number or other factors relating to the student's eligibility for funds under FSA programs.

IHCC's Admissions and Registrar's offices are required to provide the Financial Aid Office with any information it has that might affect a student's eligibility, such as the student's enrollment in an ineligible program

At the direction of the college's attorney, IHCC refers 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 an aid application.

668.16(g)(1),(2)
600.9(a)(1)(i)(A)
)

3.1.2.8 Cohort Default Rates

IHCC's Financial Assistance Office contracts with Inceptia to provide Grace counseling, Default prevention outreach and financial literacy to our students. The Default management plan includes a multifaceted approach towards financial literacy training and borrower communication.

At a minimum the Default Management Plan will:

- Identify the procedures for forming a Default Reduction Taskforce.
- Identify the responsibilities and goals associated with the Default Reduction Taskforce.
- Establish the components of a financial literacy campaign. In 2012 - 2014 the Financial Assistance office has worked with the grants office and ICAN to offer additional events for students including a budgeting experience called "Life Store", a game called "Money Walks", and a video called "Money Talks" that is available on the website.
- Establish the processes and procedures for identifying and communicating with students identified within IHCC's cohort default rate.
- Establish the processes and procedures for identifying and communicating with students identified as potential defaulters.
- Establish the process in which to evaluate IHCC's cohort default rate.

A “hold” in the Datatel rules definitions stops a student in default from receiving financial assistance or registering for classes. Removing the hold to allow a student to register is made on a case-by-case basis by the Financial Assistance Office. These students may become eligible for financial assistance once they have cured their defaulted loan.

3.1.2.9 State Authorization of Distance Education (Online) Programs

Because Indian Hills Community College (IHCC) could potentially enroll students from various geographic regions, the college is making good faith efforts to identify and obtain state authorizations, as necessary based on student enrollment and state requirements, and is in the process of developing a full policy, as informed by on-going developments related to this issue at state and national levels. These efforts include tracking state of residence for students by term, documenting authorizations as they are received from states, documenting efforts to directly contact states to discuss programs IHCC is providing to students in those states to determine whether authorization is needed, documenting applications to states and pending approvals.

Additionally, IHCC is remaining abreast of developments related to the issue of State Authorization, and is supportive of efforts designed to facilitate cooperation among the states, such as the State Authorization Reciprocity Agreement (SARA).

Authorization to offer distance education programs in the state of Iowa is provided through the classification of IHCC as a state community college. IHCC is a State institution, it is an instrumentality of a State government and is by definition compliant with section 600.9(a)(1)(i).

3.1.3 Reporting & Reconciliation

3.1.3.1 Fiscal Operations & Application to Participate

It is the responsibility of the Financial Assistance Director to complete the FISAP each year. The FISAP is completed using a process in the Datatel system.

Supporting documentation for the completion of the FISAP

is kept on IHCC's common drive. In addition, hardcopy documentation is retained by the Financial Assistance Director.

3.1.3.2 National Student Loan Data System

Financial Assistance Advisors, Computer Data Entry, Specialists, and the Financial Assistance Director of the IHCC Financial Assistance Office will be provided access to the National Student Loan Data System. It is the responsibility of the Computer Data Entry staff to ensure each employee maintains access to the system.

The NSLDS is utilized at IHCC to review the financial aid history of the students who apply for Title IV aid. NSLDS records are imported in to the Datatel system when an ISIR record is received by IHCC. In addition, NSLDS is reviewed on a student-by-student case for mid-year transfer students.

Transfer monitoring files are submitted to NSLDS on a monthly basis by the Computer Data Entry staff member. Transfer monitoring alerts are sent to IHCC via e-mail to a Financial Assistance staff member listed on NSLDS who will review the alerts. It is the Financial Assistance Director's responsibility to ensure that each student appearing on the alert is adequately reviewed.

Financial Assistance Office employees also manually add mid-year transfer students to transfer monitoring via the NSLDS.

3.1.3.3 National Student Clearinghouse

IHCC reports student enrollment history to the National Student Clearinghouse multiple times during a period of enrollment. It is the responsibility of the Registrar's Office to ensure that bulk reporting is done in a timely manner.

The IHCC Financial Aid Office reports enrollment updates to the Clearinghouse. In the absence of a formal withdrawal, IHCC's Financial Assistance Office uses the mid-term date as the last date of attendance.

Since IHCC is a term school, the Information Technology department submits enrollment history after the census date, at mid-term and after final grades are posted during the Fall, Winter, and Spring terms. The summer term is reported after the releases of final grades. A graduation file is also submitted.

3.1.3.4 Reconciliation of Grants

Reconciliation of grant funds, including Pell, is the responsibility of an assigned Financial Assistance Advisor and is completed on a monthly basis. Reconciliation of grant funds is done utilizing reports from Datatel, the Business Office and COD, ensuring all three balance. For Pell grant funds, an YTD (reconciliation report) is ordered through COD. For campus based funds, the final allocation is compared to the SQL query.

3.1.3.5 Reconciliation of Direct Loans

An assigned Financial Assistance Advisor completes a reconciliation of the Direct Loan funds on a monthly basis. The reconciliation utilizes the DSRR process in Datatel, which is then imported into MS Excel.

The DSRR report is used to compare Direct Loan transmitted amounts to COD responses. Adjustments for timing and missing responses are noted with the Excel spreadsheet and tracked for compliance purposes.

Reports are also utilized to compare data from accounts receivable (Business Office) to the Direct Loan transmitted and COD response amounts. Adjustments for timing are noted on the Excel Spreadsheet.

When completed, the finalized reconciliation of Direct Loans for the year is provided to IHCC's Controller and a copy is saved to IHCC's common drive.

3.2 General Title IV Student Eligibility Requirements

In order to be considered eligible for the Title IV aid at IHCC, the student must meet the following criteria at a minimum. Additional eligibility criteria exists for individual federal/state programs:

668.32

- Be enrolled as a regular student in an eligible program
- Not be enrolled simultaneously in elementary or another secondary school unless a consortium agreements is on file.
- Meet one of the following academic criteria:
 - Have a high school diploma or its recognized equivalent (e.g., HiSet or GED)
 - Have a passing score on an approved ability-to-benefit test (ended 7/1/12,);
 - Be home schooled, and
 - Obtain a secondary school completion credential for home schooling provided by the student's home state, if one is offered, or
 - Have completed a secondary school education in a home school setting that qualifies as an exemption from compulsory attendance requirements under state law.
 - Have a valid Social Security Number with the Social Security Administration, if required
 - Be a U.S. citizen or eligible non-citizen
 - Be registered with Selective Service, if required
 - Not be in default on a Title IV loan or, if in default, have made satisfactory repayment arrangements
 - Not be liable for an overpayment of a Title IV grant or Federal Perkins Loan or, if liable, have made satisfactory repayment arrangements
 - Must be in compliance with SAP requirements
 - Not have property which is subject to a judgment lien for a

debt owed to the U.S. or, if subject to a judgment lien, have made satisfactory repayment arrangements

- Has not been convicted of an offense involving the possession or sale of illegal drugs while within a term for which he or she received Title IV aid.

3.2.1 High School Diploma Validity

668.16(p)

Beginning in award year 11/12, if IHCC has reason to believe that a student's high school diploma is not valid, IHCC will evaluate the validity of the student's high school completion.

A request for "acceptable documentation" will be generated by the Financial Assistance Office and sent to the student. Acceptable documentation for substantiating the validity of the student's high school diploma includes:

- A copy of the diploma.
- A final transcript.

Beginning in award year 12/13, if IHCC or the US Department of Education has reason to believe that a student's high school diploma is not valid, IHCC will evaluate the validity of the student's high school completion.

The Financial Assistance Office also tracks the "invalid high school flag" within the Datatel system. Students who are flagged as possibly having an invalid high school are reviewed individually. A paragraph is included in the student's tracking letter that suggests that a high school diploma and transcript may be requested.

If questioned, the determination of validity is done by the Financial Assistance Director/Advisor/Verification Specialist. A careful review of the student's transcript is conducted, or the school is reviewed for accreditation by an organization recognized by the state Department of Education for the state in which the high school is located.

3.2.2 Ability to Benefit (Ended 7/1/12 for student whose program started after 7/1/12)

IHCC Admission Policy allows students to demonstrate eligibility for Title IV aid based on the completion of an approved ability to benefit (ATB) measure.

A student may demonstrate the ability to benefit in either of the following ways:

- Achieving a passing score on a USDE-approved ability to benefit test.
- Successfully completing postsecondary coursework that counts as six credit hours toward a program IHCC offers.

IHCC offers the Compass test so that students may have the opportunity to demonstrate the ability to benefit. Each testing session is completed under the supervision of a Certified ATB Test Administrator as established by ACT, Inc.

Test scores are documented in the Datatel System on TSUM, and the student's record is identified as ATB on FMSI.

Students who were enrolled in a Title IV eligible program prior to July 1, 2012 will be provided the opportunity to continue to demonstrate eligibility for subsequent award years under the Ability to Benefit. Transfer students will be evaluated utilizing official transcripts and the student's disbursement history noted on the NSLDS. IHCC will not be able to establish attendance for transfer students who do not provide official transcripts to the Financial Assistance Office.

3.2.3 Changes to Marital Status

Beginning with the 2012-2013 award year, IHCC's Financial Assistance Office has the option of allowing students to change their marital status during the award year.

Students will only be allowed to update their marital status if the change occurred prior to their period of attendance. If the change occurred after the student has begun attendance, no correction will be allowed.

The Verification Specialist will be responsible to process corrections for applicable students utilizing FAA Access.

3.2.4 Repeated Coursework

Students enrolled in repeated coursework may have their aid eligibility reviewed based on the course in question.

A student may only receive aid for a previously passed course one time (if taken to improve a grade, for example). This is

monitored through the Datatel system. Those courses that are repeatable due to institutional policy such as performing arts and athletics (that also contain relatively new content) or overridden if flagged in Datatel as having been a repeated course. It is the responsibility of the Financial Assistance Director to review such courses in question and to manually assign the override in Datatel.

3.3 Aid Programs in Which Institution Participates

Students attending Indian Hills Community College are eligible to receive financial assistance from the following programs. Students must qualify for aid according to the criteria established for each program.

1. Federal Pell Grant
2. Federal Supplemental Educational Opportunity Grant
3. Work Study – Federal
4. Federal Direct Loan
5. Federal Plus Loan
6. Iowa Vocational-Technical Tuition Grants
7. Iowa Grant
8. Iowa National Guard Tuition Assistance
9. Vocational Rehabilitation funds
10. Workforce Investment Act funds
11. Veterans benefits
12. Indian Hills Community College Scholarship Foundation
13. Outside scholarships administered by the Business Office
14. Iowa Education & Training Voucher (ETV) Grant
15. Iowa Kibbie Grant
16. All Iowa Opportunity Scholarship
17. Foster Care Grant
18. Gear-Up Scholarship

In addition to the programs cited above, students should explore private sources of financial assistance. IHCC will certify a private student if requested to do so by a student and/or lender. Private loans will be disbursed in equal disbursements throughout the academic year.

3.3.1 Federal Pell Grant

The eligibility for a Federal Pell Grant is determined by the Federal Department of Education. The Department documents the students eligibility by the Expected Family Contribution (EFC) number reported on the Student Aid Report (SAR). The Pell Grant is adjusted according to the student's enrollment status (full-time, three-quarter time, half-time or less

than half-time). Grants, such as the Pell Grant, do not have to be repaid.

Indian Hills has modular summer terms that when combined comprise our summer term of 12 weeks (as a term-based school, we may count each week that a day of instruction occurs as a week toward our term length). A student's summer award is calculated by using the same formula used to calculate the payment for the fall, winter, and spring terms.

If the student does not use his/her entire grant to pay tuition and books, the balance will be forwarded no later than 14 days after a balance occurs on his/her account. Should the necessary financial aid forms not be submitted to the Financial Assistance Office by the 14th day, an electronic funds transfer to Higher One will be forwarded to the student after any remaining tuition and fees have been subtracted from the student's award.

A student's Pell award will be recalculated only when there is a change in enrollment status up to the end of the 100% refund period. IHCC utilizes one Pell calculation/census date per term. Change in student enrollment levels that occur following the census date (for a student enrolled as of the calculation date) will not have an effect on the student's Pell grant. An exception to this policy would be noted when a student does not begin attendance in a scheduled course.

3.3.2 Federal Supplementary Educational Opportunity Grant

To be eligible for an FSEOG award at IHCC, a student must:

- Not have earned a baccalaureate degree.
- Have applied for Federal aid and have been determined eligible for a Federal Pell Grant with expected family contribution (EFC) of 0.
- Have an enrollment status of at least half-time.
- Awards are made by order of file completion.

If the student does not use his/her grant to pay tuition and books, the balance will be forwarded no later than 14 calendar days after a balance occurs on the student's account. Should the necessary financial aid forms not be submitted to the Financial Assistance Office by the 14th day, an electronic funds transfer to Higher One will be forwarded to the student after any remaining tuition and fees have been subtracted from the student's award.

3.3.3 Federal Work Study

The Federal Work Study Program provides students with an opportunity to earn money to assist with costs related to school attendance.

To be considered for eligibility, a student must have a SAR or ISIR on file in the Financial Assistance Office, the student's file must be complete and they must have unmet need after packaging has taken place. In addition, the student must be pre-registered or be currently enrolled at least halftime (4 credits) for the term. Exceptions to this policy can be made at the discretion of the Financial Assistance Director.

The student's cost of attendance is based upon their educational program. A budget is constructed which reflects the student's maximum earning potential.

Students are made aware of job openings via online postings for both Ottumwa and Centerville campuses and word of mouth. Students who are Interested in obtaining a positions are directed to contact the Financial Assistance Office in order to determine eligibility. The student then arranges a conference with the supervisor to interview for open positions.
<http://www.indianhills.edu/finaid/workstudy.html>

No student will receive less than minimum wage.

Student workers are assigned supervisors and perform tasks which fit the job descriptions for each job.

Work Study paychecks are available on the same schedule as college faculty paychecks. The 10th and 25th day of each month are regular pay dates.

In accordance with federal regulations, Indian Hills Community College expends at least 7% of FWS allocation to compensate students employed in community service learning positions.

3.3.4 Federal Direct Loan

Indian Hills Community College adheres to "Scheduled Academic Year" regulations in administering student loans.

Regulations require that Direct Loan/PLUS fees be included in a student's cost of attendance for loans. Indian Hill's policy is to calculate the loan fee (if applicable) at the time of loan certification and add the cost to the borrower's student budget.

The following steps outline the Direct student loan process at IHCC:

1. Students must file a FAFSA, and have been marked “File Complete” on the Datatel system. Results of this need analysis must be received by the college before a loan application can be filed.
2. Students must complete the Master Promissory Note (MPN), Institutional Loan Adjustment Request form, and Entrance Counseling electronically through the www.studentloans.gov website.
3. Financial Assistance Advisors and the Colleague system determines the cost of attendance, expected family contribution, enrollment status, and satisfactory academic progress standards on whether or not the student is eligible for a Direct Stafford Loan and what amount they can borrow.
4. Financial Assistance Advisors and the Colleague system enters the loan information on the Datatel system which is transmitted electronically to COD via CODE.
5. Loan funds will be disbursed as per the request of the Financial Assistance Advisor. Students who are borrowing for the first time through the Direct Stafford loan program must wait 30 days after the beginning of their loan period prior to receiving a loan disbursement.
6. Prior to disbursement of the Direct Loan funds, the normal processes will be performed by the Financial Assistance Office to verify student eligibility. Once verified, the funds are applied to the eligible student account and an email is sent to students notifying them of loan disbursements.
7. Credit balance funds that are available after paying any student account charges for the current term will be sent electronically to students according to federal regulation.
8. Inceptia, a 3rd party vendor, tracks students who are in grace period and who have defaulted on student loans. Inceptia initiates contact with students to help rectify their situation.
9. Students who are not making satisfactory progress or have withdrawn from classes prior to the loan disbursement date will have their loan cancelled.

Within 30 days of graduating, withdrawing, or failing to return to a subsequent semester a student is notified that he/she must complete exit counseling consisting of the following:

Student is mailed an exit letter with instructions to complete Exit counseling through an online session via www.studentloans.gov. Each applicable student borrower is notified of exit counseling and it is documented on the Datatel system.

3.3.5 Federal Plus Loan

This loan program is available to the parents of dependent students. The PLUS loan is based on the student's cost of attendance and other financial aid received.

According to the FSA Student Handbook, all students who receive PLUS funds must complete a FAFSA.

Parents of dependent students must complete the PLUS Loan Authorization form, and an authorization to complete a credit check. In addition, the parent must complete a Master Promissory Note via www.studentloans.gov.

Students that have parents who have been denied a PLUS loan may be eligible for additional unsubsidized Stafford loans. To request these additional unsubsidized loan amount a loan adjustment form needs to be completed.

The approved Plus Loan will be disbursed in equal amounts for the entire academic year enrolled.

3.3.6 Iowa Vocational-Technical Tuition Grants

The Iowa Vocational-Technical Tuition Grant Program is for students enrolling in career education (vocational-technical) courses at Iowa community colleges. These grants range from \$1 to \$1200 based on need and the student's cost of attendance. To be eligible you must be:

- A resident of Iowa as defined by the State Board of Regents.
- A United States citizen or in the United States on a permanent visa.
- Enrolled, or planning to enroll, in a career education course that lasts at least 12 weeks.
- Complete the FAFSA by July 1

Liberal arts (AA) students are not eligible to receive these grants.

3.3.7 Iowa Grant

The Iowa Grant is awarded to exceptionally needy Iowa residents. Indian Hills's policy for awarding this grant is by order of file completion, to students that are not eligible for the Iowa Vocational Technical Grant, and have an EFC of 0 to 5157.

Indian Hills reserves the right to award Iowa Grant funds to an individual based on a special circumstance as identified by the Financial Assistance Director. Under no condition specifically identified as a special circumstance by the Financial Assistance Director will an Iowa Grant award be made outside of the state of Iowa regulations concerning student eligibility or the selection of recipients.

3.3.8 Iowa National Guard Tuition Assistance

The authorization for payment of educational benefits associated with the Iowa National Guard is obtained via electronic announcement provided by the Iowa College Student Aid Commission. Only students appearing on the provided electronic announcement will be awarded Iowa National Guard educational benefits. The amount of benefit awarded is based on the student's cost of tuition.

3.3.9 Vocational Rehabilitation funds

The authorization of Vocational Rehabilitation funds is provided by area Vocational Rehabilitation Offices via written contract. Funds associated with a Vocational Rehabilitation award will not be released to the student until authorized to do so by the Voc Rehab Office. This normally occurs following the last date to withdraw from a standard 12 week course. Voc Rehab also authorizes for the summer six week term.

3.3.10 Workforce Investment Act funds

The authorization for Workforce Investment Act funding is provided to the Business Office by a Workforce Investment Act representative. Aid under this program is awarded to the student under the terms and conditions outlined within the contractual agreement.

3.3.11 Veterans benefits

Veterans benefits (with the exception of the Iowa National Guard Tuition Assistance program) are administered through the VA advisor located at the Ottumwa campus. The VA certifying official is not part of the staff of the Financial Assistance Office.

3.3.12 Indian Hills Community College Scholarship Foundation

IHCC's Financial Assistance Office does not oversee scholarships applied for and awarded by the IHCC Foundation Office. Information concerning foundation scholarship application procedures and award selection criteria can be found by contacting the IHCC Foundation Office. In addition, students will not have access to scholarship funds needed to pay tuition or book charges until such funds are received by IHCC's Business Office from the donor/provider.

3.3.13 Iowa Education & Training Voucher (ETV) Grant

The Iowa Education & Training Voucher Grant (ETV) is a federally funded program that will provide youth aging out of the Iowa foster care system with post-secondary education and training opportunities. The ETV program is funded by the Iowa Department of Human Services and will be administered by the Iowa College Student Aid Commission.

Prior to the awarding of ETV funds to a qualified student, IHCC must receive from the Iowa College Student Aid Commission written verification of funding approval. This verification is normally provided electronically through the Iowa College Student Aid Commission's website.

3.3.14 Iowa Kibbie Grant

The Iowa Kibbie Grant Program is for students enrolling in specific career education (vocational-technical) courses at Iowa community colleges. Eligible students must be enrolled and in attendance in courses of study defined by the Iowa Department of Education as career-technical or career option programs. Workforce shortage programs (all of which are career-technical or career option programs) are compiled using information from the Iowa Workforce Development (IWD) Needs Assessment and recommendations put forward by the Iowa Community College Presidents.

These grants range in amounts based on need, the student's cost of attendance, and term enrolled. To be eligible you must be:

- A resident of Iowa as defined by the State Board of Regents.
- A United States citizen or in the United States on a permanent visa.
- Enrolled, or planning to enroll, in a career education course that lasts at least 12 weeks.

- Complete FAFSA by July 15

Liberal arts (AA) students are not eligible to receive these grants.

SECTION 4: STUDENT CONSUMER INFORMATION REQUIREMENTS

4.1 Federal Student Consumer Information Requirements

Indian Hills Community College's Financial Assistance Office provides Consumer Information (in conjunction with several college departments) as required by federal regulation. IHCC's Consumer Information is reviewed and updated each year prior to the fall term. Outlined below is a Consumer Information chart identifying who receives consumer information, what they receive, and how/when it is provided.

Resources

668, subpart D

2004-05 *FSA Handbook*,
Vol 2, Ch 6

668.41(a)

| Who Receives the Information | What They Receive | How It Is Provided | When It Is Provided |
|---|--|--|--|
| Currently enrolled students and current employees | IHCC annual campus security report in its entirety (pursuant to 668.46) | IHCC provides the institution's annual security report via publication. The report is published within the college's online Credit Course Catalog each year. The report is also published on IHCC's Consumer Information webpage. Notice that this publication has been made available is provided to students and current employees each academic year via direct e-mail. | IHCC prepares and makes available its security report annually by October 1. |
| Currently enrolled students | IHCC provides notice about the availability of the following: <ol style="list-style-type: none"> 1. Information on financial assistance available to students enrolled in the institution (pursuant to 668.42); 2. Information on the institution (pursuant to 668.43); 3. The institution's completion or graduation rate, and, if applicable, its transfer-out rate (pursuant to 668.45); 4. Information about student' rights under FERPA (pursuant to 99.7); and 5. Information about athletic program participation rates and financial support (EADA) (pursuant to 668.47). | The direct electronic notice sent to currently enrolled students includes: <ol style="list-style-type: none"> 1. The identification of the information required to be disclosed 2. Provide the exact location where the information can be found 3. States that upon request the student is entitled to a paper copy 4. Informing the student how to request a paper copy. | Annually |
| The general public | Information indicating that IHCC: <ol style="list-style-type: none"> 1. Participates in Title IV, HEA programs 2. Has an intercollegiate athletic program, and provides a report on athletic program participation rates and financial support (EADA) (pursuant to 668.47) | Through publications, and online. | Annually |
| Prospective students | IHCC provides notice about the | Through publications and electronic media. | Prior to a |

| | | | |
|---|---|---|---|
| | <p>availability of the following:</p> <ol style="list-style-type: none"> 1. Information on financial assistance available to students enrolled in the institution (pursuant to 668.42). 2. Information on the institution (pursuant to 668.43). 3. Information about students' rights under FERPA. <ul style="list-style-type: none"> ➤ Notice about the availability of the institution's annual campus security report (pursuant to 668.46). 4. The institution's completion or graduation rate, and, if applicable, its transfer-out rate (pursuant to 668.45). 5. Information about athletic program participation rates and financial support (pursuant to 668.47). | Information is post to a Consumer Information webpage, and a notice of its availability is provided directly to the prospective student. | <p>prospective student's enrolling or entering into any financial obligation with an institution.</p> <p>Immediately, upon request.</p> |
| Prospective student-athletes and their <ol style="list-style-type: none"> 1. Parents, 2. High school coaches, & 3. Guidance counselors | IHCC provides a report on the completion and graduation rates of student athletes pursuant to 668.48. | Provided in writing or via electronic mail. The information is also posted to a Consumer Information webpage, and notice of its availability is provided directly to the prospective student athlete. | At the time of aid offering; annually. |
| Everyone who requests information about employment at the school. | A notice about the availability of the annual campus security report. | Provided in response to an inquiry about employment. The information is also posted to a Consumer Information webpage, and notice of its availability is provided directly to the respective party. | Immediately, upon request; annually by October 1. |
| Faculty, students, and employees | Drug and alcohol prevention information pursuant to Public Law 101-226. | This information is in the Student and Employee Handbook and in the Annual Security Report. | Throughout the academic year. |

4.1.1 Financial Aid Information

IHCC's Financial Assistance Office publishes and makes readily available to enrolled and prospective students, upon request a description of all available financial aid programs (including both need-based and non-need-based programs), and for each of those programs IHCC provides:

- Student eligibility criteria for each program
- Procedures required to apply, and all necessary forms
- Criteria for selecting recipients and for determining award amount

In addition IHCC provides information concerning awarded aid, to include:

668.41(d)
668.42
668.42(a)(1),(2)
668.42(b)(2)
668.42(b)(3)

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

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

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

Financial Aid Information is updated and published within IHCC's Course Catalog, as well as provided via IHCC's website. It is the responsibility of the Financial Assistance Director to ensure that the Financial Aid Information provided by the Financial Assistance Office is timely and accurate.

4.1.2 Institutional Information

At a minimum, IHCC provides the following general information concerning the institution.

The Registrar's office provides:

- The names of associations, agencies, and/or governmental bodies that accredit, approve, or license the school and its programs, and the procedures by which a student may receive a copy for review of the school's accreditation, licensure, or approval
- Information about any refund policy with which the school must comply, and the requirements for officially withdrawing from the school
- Information concerning the degree programs, training, and other education offered
- Information about the availability of a GED program, if the

school admits students who do not have a high school diploma or equivalent

- Information concerning the instructional, laboratory, and other physical plant facilities associated with the academic programs
- A list of the faculty and other instructional personnel

The Pothoven Student Success Center provides:

- Information concerning the special facilities and services available to disabled students

The Financial Assistance Office provides:

- Information concerning the costs of attending the IHCC (tuition and fees, books and supplies, room and board, and applicable transportation costs)
- A statement of the requirements for the return of FSA program funds when a student withdraws from school
- Information concerning whom to contact for information on student financial assistance

4.1.3 Completion or Graduation Rates

Student's Right-to-Know disclosures are provided by the Registrar's Office prior to July 1st of each year. IHCC annually prepares its completion or graduation rate.

4.1.4 Annual Security Report

IHCC annually publishes and distributes the organization's campus security report. It is the responsibility of the Dean of Student Services with the assistance of the Directors of Student Service and the Director of Campus Security to compile the information required within the report, and to ensure its accuracy.

The campus security report is primarily disseminated via the college's Course Catalog and is published online. The statistics portion of the report is also to be submitted to ED by the Dean of Student Services, as required by federal regulation.

668.41(b),(c),(e)
668.46
86.100

4.1.5 Student-Athlete Completion or Graduation Rates

IHCC provides athletically related aid, and therefore must prepare an annual report concerning the completion or graduation rate and transfer-out rate, along with related statistics of its athletic aid recipients.

668.41(f)
668.48

At the time IHCC offers athletically-related aid to a prospective student-athlete, it provides the report mentioned above to the student and to the student's parents, high school coach, and guidance counselor. The information is also published online.

It is the responsibility of the Institutional Research office to complete the annual report. It is the responsibility of the Athletic Director to ensure the report is provided to the proper parties at the time athletically related aid is offered.

4.1.6 Athletic Program Data

Upon request, IHCC must make information concerning its athletic program participation rates and financial support data available to enrolled students, prospective students, and the general public.

668.41(g)
668.47

It is the responsibility of the Institutional Research with the assistance of the Athletic Director to compile this information and make it available to those requesting it. This information is available upon request in the Athletics office in Hellyer Student Life Center.

668.6

4.1.7 Gainful Employment

IHCC has established several diploma or certificate programs that are subject to regulation governing Gainful Employment programs. These gainful employment programs are subject to the disclosure requirements established in 34 CFR 668.6(b).

IHCC posts annually the required GE disclosures to the institution's website, and submits reporting data to the Department of Education via NSLDS. The information is posted on the Financial Aid portion of the website, as well as the program specific web pages. This information is also provided to the Director of Marketing so that all program specific promotional materials can be updated.

The Office of Institutional Research provides the Financial Assistance Office support in constructing the data required to be disclosed under GE regulation. The Financial Assistance Office is required to provide Median debt calculations and estimates cost

information with the assistance of the IT department. The Financial Assistance Office is also responsible to update GE information posted to IHCC's website.

It is the responsibility of the Financial Assistance Director to gather the required reporting data via SQL query. Information is then formatted according to the NSLDS format requirements.

SECTION 5: APPLICATIONS & FORMS

5.1 Application Process

IHCC provides guidance to new and continuing students concerning financial aid application procedures in many different ways. IHCC's Financial Assistance Office provides general application and eligibility information within the college's Student Handbook. In addition, the Financial Assistance Office provides a great deal of application information via the department's website.

To be considered for financial aid at IHCC, a student must:

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

IHCC uses the Free Application for Federal Student Aid (FAFSA) as the basis of the financial aid process. IHCC does not require a separate institutional aid application for financial aid.

Applications for financial aid are electronically received by IHCC using the DOEI process in Datatel. It is the responsibility of the Computer Data Entry/Financial Assistance Advisor to monitor the SAIG Mailbox (and complete the DOEI process) to ensure student applications (ISIRs) are received in a timely manner.

It is the responsibility of the Financial Assistance Advisor to review subsequent ISIRs received for applicable students. Further information concerning file review procedures can be found in section 6 of this manual.

Resources

5.2 Forms

Many different forms are utilized by IHCC's Financial Aid Office during the application and file review process. The title and brief description of several forms is provided below:

Verification Form (Dependent and Independent):

This form is utilized to collect information required for verification purposes.

Supplemental Nutrition Assistant Program (SNAP Verification)

If a student reported SNAP benefits on the FAFSA and is selected by the Federal processor, the Financial Assistance Office sends this letter to the student to verify the SNAP benefits they listed on the FAFSA.

Child Support Paid Verification:

If a student reported paid child support on the FAFSA and is selected by the Federal processor to be verified, the Financial Assistance Office sends this letter to the student to verify the child support paid.

Income Clarification Form:

This form is used to collect income and expense data from students or parents who report an unusually low amount of income on the FAFSA.

Special Circumstances Form:

Students are required to complete this form if he or she feels their status warrants a professional judgment by the Financial Assistance Advisor or Director.

Satisfactory Academic Progress Appeal Form:

Students who are on dismissal due to academic performance are required to complete this form in order to appeal the dismissal status. The dismissal letter encourages the student to print the form from our website.

Academic Plan Form:

All students who are granted a financial aid appeal are

required to complete the academic plan form This form is collected at the time of appeal.

Dependency Override Appeal Request Form:

Section A: The Financial Aid office may consider **unusual circumstances** regarding dependency status for students who do not meet the criteria established by the U.S. Department of Education on the 2014/2015 FAFSA for independent students. Examples of unusual circumstances include:

- You have been legally removed from your parents' or legal guardians' home.
- You have a documented case of abuse by parent(s).
- Incapacity of parent(s), such as incarceration, mental or physical illness.
- You are a refugee whose parents are in another country and you are not able to locate them.
- Other extenuating circumstances that can be sufficiently documented.

Section B: Federal regulations also indicate four conditions that **DO NOT** qualify as unusual circumstances and therefore, cannot be used as reasons to make a student independent. If one of these conditions applies to you, please request and complete a Parent Refusal Form.

- Parents refusing to contribute to the student's education
- Parents unwilling to provide information on the application or for FAFSA verification.
- Parents not claiming the student as a dependent for income tax purposes.
- Student demonstrating self-sufficiency.

Parent Refusal Form:

Under the Federal law, a financial aid administrator may, but is not required to, offer a dependent student an Unsubsidized Direct Stafford Loan, but no other Title IV Federal student aid if the dependent student's parent(s) have stopped providing financial support to the student, will not financially support the student in the future, and decline to complete a Free Application for Federal Student Aid (FAFSA). If you (the student) meet the following, you may still be able to receive a

Federal Unsubsidized Direct Stafford Loan:

- Parents refusing to contribute to the student's education.
- Parents unwilling to provide information on the application or for FAFSA verification.
- Parents not claiming the student as a dependent for income tax purposes.
- Student demonstrating self-sufficiency.

Loan Adjustment Request Form:

If a student wishes to reduce, decline or modify their Direct Stafford or PLUS loans, they will complete this form and return to the Financial Assistance Office. The Financial Assistance Advisor is responsible for adjusting the attendance pattern, cost of attendance budget and loan amount as requested by the student if the request complies with Federal regulation.

Forms are stored in a file cabinet at the Financial Assistance Office in Ottumwa and Centerville and on the IHCC common drive. They are also available on the Financial Assistance website. Required forms are distributed automatically to each student based on the criteria provided in the student's ISIR. Forms are tracked using the CRI screen in the Datatel system. When a form is received and reviewed by an employee of the Financial Aid Office, it is marked as "received" in CRI.

5.3 Deadlines

IHCC does not publish a deadline for the submission of a FAFSA outside of the federal deadline of June 30th of the applicable award year.

In order to be eligible to receive an Iowa Vocational-Technical Tuition Grant an otherwise eligible student must file his or her FAFSA before July 1st preceding their anticipated term of enrollment. Students are informed of this deadline via the college's Course Catalog and website.

Although IHCC does not publish deadlines associated with the submission of institutional forms, IHCC awards and disburses aid with the parameters defined by federal late disbursement regulations.

SECTION 6: FILE REVIEW

6.1 Verification

6.1.1 Selection of Applicants to be Verified

Only those students who are selected for verification by the Central Processor are subject to verification at IHCC in accordance with the following criteria:

- At the time the student's ISIR is received by IHCC, a tracking letter is generated notifying the student that they were selected for verification and what documentation is needed to complete the verification process. Each academic year, IHCC utilizes custom verification forms when communicating the verification requirements with the applicable students.
- After all documents are received, verification is completed by using IVER process within Datatel. If tolerance is not within federal guidelines, corrections to the student information are processed. (Beginning with the 2012-2013 award year, tolerance will not be considered.)
- No federal or state aid is awarded to a student until the verification process is completed. This includes receiving an ISIR which accurately reflects any EFC changes determined as a result of verification.

IHCC has developed rules within the Datatel system to Institutionally select students to verify who have reported unusually low income and/or dependency issues.

6.1.2 Acceptable Documentation & Forms

It is the responsibility of the student chosen for verification to provide acceptable documentation required to complete the process. Although there is no IHCC deadline for application verification, a student will not be packaged for aid until the verification process has been completed accurately. Acceptable documentation includes at a minimum:

- The accurate/legible completion of the federal verification worksheets. We provide "fillable" PDF's on the Financial Assistance website to allow students to type in their data, print off and return to the Financial Assistance Office.
- Beginning with the 2012-2013 award year, copies of income tax

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668.54(a)(2)(i),(ii)
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returns will not be acceptable forms of documentation for verification purposes. Students are highly encouraged to utilize the IRS data retrieval tool when completing/correcting the FAFSA. Non tax filers who report income earned from work will be required to provide W-2's to the Financial Assistance Office. An exception to this requirement will be made for self-employed individuals. Effective 2012-2013, IHCC will be accepting tax transcripts for verification purposes. Signatures are not required on the tax transcripts submitted to the Financial Assistance Office.

- Signed statement concerning any untaxed income or benefits. This includes required information concerning child support. No additional documentation is required for verification of the receipt of food stamps.
- Signed statement concerning household size.
- Signed statement concerning number enrolled.
- Signatures are required for students and parents (as applicable) on the verification worksheet. Starting in 2012-2013, IHCC will be accepting tax transcripts for verification purposes. Signatures are not required on the tax transcripts submitted to the Financial Assistance Office.

Students and parents are provided a written statement when chosen for verification outlining their responsibilities for providing any required documentation. When an ISIR chosen for verification is received by IHCC, the documents that are required are assigned automatically by the Datatel system. Written correspondence to the student requesting the completion/providing of such documents is also automatically assigned.

Once the student or parent (if applicable) has provided all the required documentation, the verification specialist processes the verification on the Datatel system. If during the verification process, conflicting information is noted or further documentation is required, the student is notified by phone conversation or mailing called a "contact request" form.

It is the responsibility of the Financial Assistance Director that the verification process at IHCC is carried out according to federal regulation.

In the event a currently enrolled student who has already been awarded aid is subsequently chosen for verification on a late arriving ISIR, he or she will be contacted via phone, email or postal mail in order to request completion of the verification process. Multiple attempts will be made to

request completion of the verification process should the student fail to respond. If a student fails to complete the verification process prior to the next payment period, future aid will not be released until verification is completed.

If it is determined during the verification process that a student is attempting to perpetrate fraud, it will be the responsibility of the Financial Assistance Director and the Dean of Student Services to refer such individuals to the Office of Inspector General (OIG).

6.1.3 Data Elements to be Verified

The following data elements are subject to verification by IHCC's Financial Assistance Office:

- Household size
- Number in college
- Supplemental Nutrition Assistance Program (SNAP, formerly food stamps)
- Child support paid

For non-tax filers:

- Income earned from work

For tax filers:

- Adjusted gross income (AGI)
- U.S. income tax paid
- Education credits
- Untaxed IRA distributions
- Untaxed pensions
- IRA deductions
- Tax-exempt interest

Corrections to the verified data elements can be made on the IVER screen in the Datatel system. The Datatel system returns a recalculated EFC, and suggests whether correction tolerance has been exceeded (tolerance will no longer be considered beginning with the 2012-2013 award year).

All documentation submitted to the Financial Assistance Office will be scanned into the student's file. Students are urged to make any needed copies before submitting as the original documents are unable to be returned to the student.

If a correction to the student's EFC is noted, and corrections are required to be submitted to the Department of Education, corrections are exported utilizing the CAPX process in Datatel. The financial aid

representative submitting the corrections to CAPX process in Datatel will make a note in the verification comments section stating the date said correction was submitted using CAPX process in Datatel.

A student is not packaged or awarded aid prior to the completion of the verification process. In the event a student had been awarded aid, and then has been chosen for verification on a subsequent ISIR, any notices of change in the award amounts are provided within a “revised” award letter.

6.1.4 Conflicting & Inaccurate Information

IHCC operates a proactive system to identify conflicting information regardless of the source and regardless of whether the student is selected for verification.

IHCC reviews all subsequent transactions for a student for the entire processing year. ISIRs are examined for changes in EFC or for changes in any “C” flags when the transaction is imported into the Datatel system. If the EFC changes and the pertinent data elements were not verified, IHCC investigates by contacting the student directly to resolve any inaccurate or conflicting information.

IHCC does not disburse aid until all conflicting information has been resolved.

If IHCC’s Financial Assistance Office suspects that a student, employee, or other individual has misreported information or altered documentation to fraudulently obtain federal funds, the act may be reported and evidence provided to the Office of Inspector General.

6.2 Database Matches, Reject Codes, & "C" Codes Clearance

A “C” printed next to the EFC means the student has an eligibility problem that must be resolved before Title IV aid can be disbursed to the student. Below is a list of common areas associated with “C” codes:

- Selective Service Match
- DHS Match
- Social Security Administration Citizenship Status
- Student’s Social Security Number Match
- Veterans Affairs Status Match

The ISIR Guide

- NSLDS
- Responses to Drug Conviction Question on FAFSA
- Unusual Enrollment History
- Pell LEU
- Aggregate Loan Limits / Subsidized loan lifetime limits

In the event a student has an eligibility problem associated with a “C” code, a tracking letter is generated by the Datatel system upon import. The student is responsible to respond to the tracking letter in order to resolve the “C” code. In some cases, a “C” code requires a correction to the ISIR and reprocessing by the CPS. The financial assistance staff representative investigating the “C” code is responsible to ensure that proper documentation is maintained in the student’s file when provided.

6.3 Review of Subsequent ISIR Transactions – Post-screening

As previously stated, IHCC’s Financial Assistance Office is required to review all subsequent transactions for a student for the entire processing year. Such review includes an already verified earlier transaction.

The review process determines:

- If the EFC or the “C” flag has changed or if there are new comments or NSLDS information that impacts eligibility for aid.
- Checks for any updates or corrections.

If the EFC has not changed and there are no changes in the “C” flag or NSLDS information, generally no action is required by IHCC. If the EFC does change but it either doesn’t affect the amount and type of aid received or the data elements that changed were already verified, no action is required.

Review of subsequent ISIR transactions occurs during the importing of ISIRs into the Datatel system. ISIRs are brought into the system on at least a weekly basis. During high application periods, ISIRs may be brought into the system on a daily basis.

It is the responsibility of the Financial Assistance Director/Advisor/Verification Specialist to ensure that subsequent ISIRs are reviewed. In addition, it is the responsibility of the Financial Assistance Director/Advisor to ensure that appropriate action has been

GEN-98-6
GEN-01-03
The ISIR Guide

taken to notify the student of any circumstances that render the student no longer eligible for Title IV aid.

SECTION 7: STUDENT BUDGETS

7.1 Various Student Populations

Student expense budgets are constructed for each of the following populations:

- Students Living On Campus
- Students Living With Parents
- Students Living Off Campus

Student budgets are adjusted based on level of enrollment.

Student expense budgets are assigned through the Datatel system based on attendance pattern, student type, active program, and the housing plans provided on the FAFSA.

7.2 How Budgets are Derived & Updated

Student budgets include each component required by federal regulation:

- Tuition
- Books and Supplies
- Room and Board
- Transportation
- Personal Expenses
- Average amount of Federal Direct Loan fees associated with student borrowers at IHCC.

IHCC budgets are derived from a summation of actual and estimated costs. Direct college costs (tuition & on-campus room & board) are actual expenses. The other costs (off-campus room & board, books, personal and transportation) are based on estimated expenses that students may incur externally. Tuition expenses are based on 30 hours of enrollment (average number of credit hours per term taken by IHCC student multiplied by 3 terms of the academic year). The average cost of

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books and supplies, transportation, and personal expenses are derived with assistance from the Iowa College Student Aid Commission. The personal expenses/miscellaneous component includes the fees associated with receiving a Direct Student Loan. The cost of room and board is derived from average cost of rental in the region as indicated by published survey data and information concerning the cost of food at home provided by the Bureau of Labor Statistics. Such components are increased by the CPI for each passing year.

All student budgets are considered good-faith estimates of the projected educational expenses that the majority of students may incur while attending IHCC. Individual students may experience varying costs as a result of special educational expense needs. Variation to a student's budget is based on special educational expenses will evaluated by the Financial Assistance Director/Advisor on a case by case basis.

Employees who receive the Indian Hills Community College credit tuition waiver will have the tuition costs removed from their budgets as the college pays this tuition and is of no cost to the student/employee.

7.3 Additional Costs

The following items can be added to the student budget at the discretion of the Financial Assistance Director/Advisor:

- Documented Dependent Care Expenses
- The Documented Cost of a Personal Computer
- The Cost of Additional Mileage for out of Area Students
- Study Abroad

The additional costs noted above are documented in the student's electronic Datatel file under comments in the Datatel system for the applicable award year.

SECTION 8: AWARDING/PACKAGING FINANCIAL AID

8.1 Packaging Philosophy

Resources

Indian Hills Community College considers Pell Grants to be the first source of aid to the student, and packaging Federal Student Aid (FSA) funds begins with Pell eligibility. IHCC utilizes the Datatel system to assist in the packaging of student awards based on the eligibility criteria (rules) defined by the federal government, and the Financial Assistance Office. Pell Grant awards are packaged based on the Department of Education issued Pell payment schedules.

IHCC has established its packaging philosophy under the guidelines of federal law that requires aid administrators to find out whether the student is eligible for certain other FSA programs that would reduce the student's need for borrowing.

Indian Hills Community College is aware of its community responsibility; therefore, equal consideration will be given to full and part-time students in the award process. In making this statement, the college recognizes that less than half-time students are likely to have a lower aggregate need than full-time students, and will not receive an award from FSEOG. The award priorities will be established so that students with the lowest EFC, who have completed files, will be awarded first until all FSEOG and Iowa Grant has been awarded.

IHCC substitutes unsubsidized Stafford loans, and PLUS loans for the student's expected family contribution (EFC). However, a student's eligibility for PLUS loans is not a part of the packaging process. If a student seeks access to such a loan, the loan is added to the student's financial aid package at the time of certification by the Financial Assistance Advisor. If these loans are used to substitute for EFC, loan amounts that exceed the EFC are counted as a resource or estimated financial assistance.

Students receiving vocational rehabilitation funds must provide documentation as to the amount they will be receiving during the award year. This documentation is kept in the Business Office. Vocational rehabilitation funds are not considered a resource when packaging aid for the student. However, IHCC must coordinate funds available from the vocational rehabilitation agency and from institutional, state, and federal student financial assistance programs to prevent an over award.

It is the belief of IHCC that self-help, in the form of work, would normally be a part of each student's financial aid package. The previous

statement has been made with full knowledge that there are a limited number of work positions available. A student who indicates interest in the work-study program is evaluated for eligibility and (if eligible) manually packaged for work-study aid. Aid for work-study is only finalized when the student has been hired and all proper employment forms have been completed.

8.2 Determining Award Amounts

IHCC award amounts (for each fund under the control of the college) are determined based on the amount of funds available and the number of students eligible. The Financial Assistance Office makes every effort to set award levels so that an appropriate award amount is provided to the maximum number of eligible students possible.

If during the same academic year, a student attended another institution, the student will need to submit the prior school's official transcripts and last date of attendance before financial aid will be awarded at IHCC.

674.10(b)
675.10(c)
676.10(b)

It is the responsibility of the Financial Assistance Director to determine the minimum and maximum award parameters. Award amounts do not vary based on student types. Equal consideration is given to each student regardless of student status (i.e. traditional vs. non-traditional).

Fund balances are monitored by the Financial Assistance Director/Advisor. Award limits are established in the Datatel system. Over award warnings occur once the awarded amount exceeds the established limit.

8.3 Package Construction

Student packaging occurs only after the student has been marked "verification complete" on the Datatel system. "Verification Complete" is marked only after the student has been successfully verified. PKCR is run using a saved list of students who are "verification complete" or were not selected by the federal process to undergo verification. Such documentation includes items required for verification or professional judgment.

Any late awarding of FSEOG or Iowa Grant funds is done based on the date the student's ISIR is received.

It is the responsibility of the Financial Assistance Director to ensure that IHCC's packaging policy is being strictly enforced. The Financial Assistance Director oversees the packaging process. To ensure compliance with Title IV, state, and institutional guidelines, rules are written into the Datatel system that assists in the monitoring of student

eligibility.

8.4 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 as discussed below.

8.4.1 529 Plans: Prepaid Tuition Plans & College Tuition Savings Plans

IHCC considers distributions from a prepaid tuition plan according to federal regulation. Such distributions are to be directly applied to the beneficiary's higher education expenses. IHCC considers the amount of the distribution as a resource and estimated financial assistance.

IRC 529
IRS Pub 970

8.4.2 Section 127 Educational Assistance Programs

Employer-paid educational assistance is considered to be a resource by IHCC.

IRC 127
IRS Pub 508

IHCC is notified by employers/students of assistance received from businesses by e-mail & direct mail correspondence. Those requests are processed in the Business Office and posted to the AIDE screen in Datatel reducing their financial need.

8.5 Summer Awards

For the purpose of packaging and awarding financial aid IHCC treats the summer term as a trailer. Campus-based funds are utilized from the prior year rather than the upcoming year's allocation.

Summer EFCs are derived from the student's attendance pattern. Those enrolled only during the summer term are given the appropriate EFC. IHCC utilizes the same EFC to award campus-based aid and Direct Loans for the same period of enrollment.

8.6 Award Package Notification

Students are notified of award packaging via an electronic Award Letter via WebAdvisor. The student also receives a hard copy of the award letter and the Shopping Sheet via US Postal Service. The award letter provides explanation of the following:

- Indicates the enrollment period, terms, or payment periods as they relate to the awards.
- Provides information describing the amount and type of aid awarded and any conditions linked to award eligibility for each type.
- Information about the pro-rated amounts of Pell eligibility, anticipated repayment amount for loans have been added in beginning 2013-2014.
- Outlines what must be done to accept or decline any part of the offered student loan aid, including the need to complete and return specific materials.
- Discloses the general enrollment standards a student must meet to receive aid amount.
- Includes phone and fax numbers for contacting the Financial Assistance Office.

Award letters are automatically generated once a student has been packaged for financial aid. It is the responsibility of the Financial Assistance Director or Financial Assistance Advisor to ensure that an initial Award Letter notification is mailed to their address on file and a Revised Award Letter notification is e-mailed to the IHCC student e-mail address when packaging or re-packaging occurs.

8.7 Over awards

Over awards can occur for a variety of reasons including institutional errors. However, IHCC has taken several steps to ensure that a student does not receive more Title IV aid than the amount for which he or she is eligible.

IHCC's Financial Assistance Advisor generates a report via the Datatel system to monitor and identify over awards. In addition, interoffice communication requirements have been established between the Business Office and the Financial Assistance Office.

When over awarding occurs as a result of the student's receiving financial assistance from outside sources, an adjustment will be made to the student's original campus-based award. Most aid packages are developed with the assumption that the student will be attending on a full-time basis. When a student registers for a reduced course load, he/she should expect a portion of his/her award package to be reduced or eliminated.

8.7.1 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 IHCC has determined that the student is liable for an over award, the options to resolve the over award include:

- Increasing the student's budget (if warranted)
- Invoking the \$300 tolerance for campus-based aid
- Reducing or cancelling award(s)
- Terminating the student's FWS employment
- Returning loan proceeds that have not been delivered to the student

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SECTION 9: PROFESSIONAL JUDGMENT

9.1 PJ Authority & Individuals Who May Exercise It

Professional judgment (PJ) decisions are made by IHCC's Financial Assistance Office on a case-by-case basis as the result of examining a particular student's unique circumstances.

The Financial Assistance Director/Advisor/Verification Specialist will have the authority to exercise professional judgment. PJ will only be exercised after any required verification has been completed, all required institutional forms have been completed, and any conflicting/inconsistent information has been resolved.

The PJ decision of the Financial Assistance Office is final, and cannot be appealed to the Department of Education.

The student should complete the Special Circumstances form or complete signed written statement in order to be considered for a PJ. The form can be obtained at either of the IHCC Financial Assistance Office locations. In addition to completing the form listed above, the student and parents (if applicable) must provide supporting

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HEA 479A
2014/2015 *FSA Handbook*,
Application and
Verification Guide

documentation to the Financial Assistance Office. Such documentation includes:

- Most recent tax transcript
- W2's
- Letter of explanation
- Copy of claimants unemployment record (if applicable)
- Most recent pay stub (if applicable)
- Disability award (if applicable)
- Any other notice of benefits determination (if applicable)
- Third party verification of the situation

After all documentation is collected, the Financial Assistance Director/Advisor/ Verification Specialist will evaluate the material for PJ consideration. If the PJ is approved, a correction will be made to the ISIR within Datatel with system or on FAA Access. In addition, the Financial Assistance Staff will indicate on the Comment screen on the Datatel system that a PJ has been exercised.

Upon receipt of the corrected ISIR, the student will be repackaged for financial aid. A revised award letter will be provided to the student indicating any new award amounts following the evaluation of the special circumstance.

9.2 Circumstances Where PJ May be Used & Possible Actions

In accordance with federal regulation, the HEA gives authority to the IHCC's Financial Assistance Office to exercise PJ in the following areas:

HEA 479A

- Dependency status (dependent to independent only)
- Certain data elements used to calculate the expected family contribution (EFC)
- Cost of attendance (COA)
- Satisfactory academic progress (SAP)

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The circumstances outlined as “special circumstances” by IHCC include but are not limited to:

- Loss of employment due to the termination, layoff, disability, retirement, company closing, or plant shutdown.
- Loss of an untaxed benefit or income including worker's compensation, child support, pensions and annuities, or social security benefits.
- Separation or divorce.
- Death of individual whose information was reported on FAFSA.
- Documented excessive medical expenses.

SECTION 10: DISBURSEMENTS

10.1 Disbursement Process

Resources

Due to the separation of duties requirement, IHCC recognizes that no one office may be responsible for both the authorizing and disbursing of financial aid. The delivery of Title IV funds must be carried out by organizationally independent individuals in accordance with cash management rules. While the Financial Assistance Office awards aid and authorizes payment to these students, the business office actually disburses and delivers the funds.

668.16(c)(2)

The Financial Assistance Director, and at his/her direction the staff of the Financial Assistance Office, is responsible for the approval and the

authorization of payment of Title IV programs. The Business Office is responsible for the disbursement and delivery of Title IV funds.

The enrollment status of students is verified through a query ran in the Datatel system prior to the authorization of aid disbursements. It is the responsibility of the Financial Assistance Director to ensure the award eligibility criteria (including enrollment status) have been verified prior to authorizing payment. IHCC's Financial Assistance Office also collaborates with the Registrar's Office to ensure the timely and accurate processing of student withdrawals. Students who have elected to withdrawal from courses at IHCC have their enrollment data updated immediately in order to ensure the proper processing of financial aid.

For students enrolled in late start classes, the associated enrollment level will only reflect the coursework the student has already begun. Federal and State financial aid will not be disbursed to students who are enrolled in late start classes until the student's late start section has begun and attendance has been verified. Therefore, the timing of the disbursement of grants and loans may be delayed until the student begins coursework in late start classes and attendance is verified. For the purposes of this policy, late start classes are defined as any course that begins after the official start date of the term.

10.2 Definition of Disbursements & Disbursement Methods

IHCC Defines Disbursement as: The process through which FSA program funds are paid to a student (or parent for PLUS Loan funds).

Disbursements are made via a credit to a student's institutional account rather than a cash disbursement made directly to the student or parent (in the case of a PLUS loan).

For the purposes of disbursing federal grant funds, IHCC uses institutional funds to disburse Title IV funds to a student prior to the drawdown and receipt of Title IV funds.

668.164(a)(1)

For the purposes of disbursing loan funds to a student or a parent borrower, receipt of Title IV funds must occur prior to crediting a student's account.

Beginning with the 2013-2014 academic year, IHCC will not penalize Title IV recipients for nonpayment of fees due to financial aid regulations or delays attributable to the school (delay for 30 days the first disbursement for first-time borrowers). In order to ensure that this policy is strictly monitored, students with pending aid (finalized aid that has not been transmitted) are removed from lists of potential registration

668.14(b)(21)

purge or late fee assessment. This identification procedure is carried out through communication between the Financial Assistance Director and the Business Office. If a late fee was assessed to a student account, the student can contact the Financial Assistance Director who will work with the Business Office to determine if the fee can be removed on a case-by-case basis.

10.3 Delayed Disbursement for First Time Borrowers

IHCC delays the disbursement of Direct Stafford loan funds until 30 calendar days after the student's program of study begins if the student is in the first year of an undergraduate program and is a first-time Direct Stafford borrower at IHCC.

Prior to awarding delayed Direct Stafford loan funds to an IHCC student, the IHCC Financial Assistance Office confirms that he or she remains an eligible student. For such an award, confirmation includes that the student is enrolled at least half time and has not unofficially withdrawn from classes.

IHCC determines and documents that a student remains eligible to receive Direct Stafford loan funds through an identified procedure. The IHCC Financial Assistance Office runs an Enrollment Report from the Datatel system and if a student ceases to meet minimum eligibility requirements to receive loan funds, the loan is cancelled before the 30 day delayed disbursement date.

10.4 Student & Parent Authorizations

Authorization for disbursement of Title IV funds to an amount equal to any charges incurred in the Indian Hills Bookstore is collected on the receipt, and signed by the student at the conclusion of each transaction.

Written authorization must be provided by the student or parent in order to disburse Title IV funds by crediting the student's account to pay current institutional charges for educationally-related activities other than tuition, fees, and contracted room and board.

668.165(b)(1)(ii)

10.4.1 Disbursing FWS Funds to Pay Current Institutional Charges for Tuition, Fees, Contracted Room & Board, & Other Institutionally-Provided Educationally-Related Goods & Services

In the event a student earning FWS funds has failed to pay all Current Institutional Charges for Tuition, Fees, Contracted Room & Board, & Other Institutionally-Provided Educationally-Related

Goods & Services the student will be paid their normal paycheck and encouraged to write a check to cover their outstanding bill. The Business Office will work with the student if they would prefer to endorse their check back to the institution.

675.16(a)(3)(iii),
(4)(i)(A),(5)(6)

10.4.2 Disbursing FWS Funds to Pay Minor Prior-Year Institutional Charges

IHCC does not disburse aid to pay minor prior-year institutional charges. It is the responsibility of the student to pay all prior-year charges before enrolling in a subsequent term.

10.4.3 Holding Excess Title IV Funds (Credit Balances)

IHCC does not hold excess Title IV Funds. There are no policies or procedure that allows a student or parent to authorize IHCC to hold excess Title IV Funds beyond the required disbursement timeframe noted within cash management regulations.

10.5 Student & Parent Notifications

Student notification of Title IV disbursement occurs via a printed format sent directly to the student's or parent's preferred mailing address recorded in the Datatel system.

668.165(a)(1)(i)
675.16(a)(2)
668.165(a)(2)
668.22(a)(4)(i)(B)
668.22(a)(4)(ii)

Notifications include:

- Eligibility for funds from Title IV programs.
- Title IV loan proceeds credited to the student's account, notification to the borrower of the disbursement date and amount, his or her right to cancel all or a portion of the loan, and the procedures for requesting cancellation.
- Post-withdrawal disbursement containing loan funds eligible to be credited to the student's account, notification to the borrower of the disbursement date and amount, his or her right to cancel all or a portion of the loan, and the procedures for requesting cancellation.
- Offering a student (or PLUS borrower) any portion of a post-withdrawal disbursement not credited to the student's account, and notification to the student and PLUS borrower of the procedures for requesting the undisbursed funds.

Each of these notification examples are generated by IHCC's Financial Assistance Office or Direct Lending.

SECTION 11: SATISFACTORY ACADEMIC PROGRESS

11.1 Process Overview & Responsibilities

Resources

Indian Hills Community College is required to establish and monitor academic progress standards for students who are federal and state financial aid applicants. This policy ensures that any student who receives or applies for financial aid is making progress toward a degree. The student's total academic history is monitored regardless of whether he/she has previously received financial aid.

In order to maintain eligibility for financial aid, a student must meet the "Standards Requirements" listed below. Failure to meet these requirements will result in the loss of aid. Programs affected by "Standards Requirements" are:

| | |
|--------------------|---|
| Federal Pell Grant | Federal Stafford Loan |
| Federal SEOG | Federal PLUS Loan |
| | Iowa Vocational Technical Tuition Grant |
| Federal Work Study | Iowa National Guard Tuition Program |
| | Designated IHCC Foundation Scholarships |
| Iowa Grant | Iowa Kibbie Grant |
| Private Loans | |

11.2 Quantitative Measure

The quantitative measure for satisfactory academic progress requires that a student must successfully complete 67% of enrolled credit hours. This will be measured on a cumulative and term basis. Example: If the student enrolls for a total of 24 credit hours their first academic year, the student must satisfactorily complete 16 credit hours ($24 \text{ credit hours} \times .67 (67\%) = 16 \text{ credit hours}$).

In addition, the student must achieve completion of the academic program in 150% of the published length of the program. Example: Associate in Arts degree = 61 credit hours. Maximum enrolled credit hours permitted to complete this program would be 91.5 ($61 \text{ credit hours} \times 1.5 (150\%) = 91.5 \text{ credit hours}$).

11.3 Qualitative Measure

The qualitative measure for satisfactory academic progress requires that a student maintain a minimum cumulative grade point average.

During the entirety of a student's program, the student must maintain a minimum cumulative GPA of 2.00.

11.4 Probationary or Conditional Periods

Academic progress will be reviewed following each term to determine if the "Standards Requirements" have been met.

The first term the student fails to meet the "Standards Requirements" the student will be placed on "Financial Aid Warning." This probationary period should be utilized by the student to meet the "Satisfactory Academic Progress Standards Requirements". However, if a student fails to earn any credits during any term of enrollment they will be placed on "NO AID" status. A student may not receive any aid listed above while on dismissal.

11.5 Treatment of Repeated Courses, Audited Courses, Pass/Fail Courses, Withdrawals, Incompletes and Developmental Courses

Transfer credit, credit/no credit, course repeats, withdrawals, incompletes, and developmental courses will be included as part of the student's cumulative credit hours enrolled for maximum time frame purposes. Such courses are also included as "attempted hours" for the above identified quantitative measure.

Courses taken for audit, hours via Institutional Proficiency Exams, Advanced Placement, and hours via the College Level Examination Program will not be included as a part of the student's cumulative credit hours enrolled for maximum time frame purposes.

11.7 Transfer Students

Transfer students will submit previous college transcripts and hours earned are added to the quantitative measure above.

IHCC retains the right to request transcripts on a case-by-case basis for those students expected of "shopping" for financial aid from school to school. Examples of this student type include those from outside area 15 who complete applications for enrollment on the same date/time, and often have the same address. Often these students have attended

multiple schools for less than a period of one academic year. Individual review of this student type is done in order to prevent fraud, and to potentially lower IHCC's cohort default rate.

Student's failing to meet the identified measure will be placed on academic dismissal, and will have an opportunity to appeal the status.

11.7 Appeals

If special circumstances exist, the student may submit a letter of appeal to the Financial Assistance Office stating the reasons the "Standards Requirements" were not met. The appeal form is accessible via hardcopy or online. If the appeal is approved by a review committee, eligibility for financial aid will be reinstated on a probationary level (the student will be moved from a dismissal status to a probation status).

Each appeal for financial aid must be accompanied by IHCC's Academic Plan worksheet. The Academic Plan outlines that the student must meet an additional qualitative measure each term that will bring them back into compliance with the standards of the policy (ex: additional GPA or completion requirements). The student must also meet the increased quantitative measure of completion of the credit hours attempted each term under the plan. The combination of these two more rigorous standards ensures that the student is making progress toward meeting the cumulative Satisfactory Academic Progress measures outlined in sections 11.2 and 11.3 above. The Academic Plan remains in place until which time the student has achieved Satisfactory Academic Progress, or has completed his or her program. Students who are making progress under the Academic Plan will be placed on "Academic Plan" status following their probationary term.

A student under the IHCC Academic Plan is required to meet with an Academic Advisor on the Ottumwa campus or the Dean of the Centerville Campus or designee on the Centerville campus. Applicable students are provided contact information for the Academic Advisors and Centerville staff, and responsibility rests with the student for attending the required appointment. This Academic Plan is completed and signed by both the student and the Academic Advisors.

Students who fail to maintain the required measures outlined on the Academic Plan will be placed on "NO AID" status. If a subsequent appeal is denied, a student who successfully achieves 67% cumulative requirement and the minimum 2.0 GPA requirement, and pays out of pocket may have eligibility restored.

In addition, a student may also be put on a Program Plan if they appeal due to unsatisfactory based on not completing their program within the 150% time frame. While on a Program Plan, the student must only register for classes required for their current program and must

successfully complete those classes. A cumulative GPA of at least 2.0 must also be maintained.

11.7.1 Regaining Eligibility

Students who have not met the “standard requirements” retain the right to regain eligibility by completing the number of credit hours necessary to achieve the 67% requirement and/or minimum cumulative grade point average need for their grade level. This will be at the student’s own expense. When these hours have been complete, the Financial Assistance Office must be notified so eligibility for aid can be reinstated.

SECTION 12: RETURN OF TITLE IV FUNDS

12.1 Process Overview & Applicability

The processing of Title IV returns at IHCC is a complex process that involves a great deal of interoffice cooperation and coordination. The following information outlines the responsible parties involved in the Title IV return process.

Student Withdrawals: The One Stop Office/Registrar’s Office is designated as the contact point for students who wish to officially withdraw. The Registrar’s Office is responsible to complete verification of all official student withdrawals. Unofficial withdrawals are covered in greater detail below.

Notification of Student Withdrawals: The Financial Assistance Advisor is responsible to run a query in the Datatel system in order to identify those students who have officially withdrawn during the payment period. The Registrar’s Office is responsible to submit official withdrawals to the National Student Clearinghouse via its established/required reporting criteria. The Information Technology office assists with this process via an electronic file transfer to NSC. Unofficial withdrawals are identified by a query in Datatel system after final grades for the term are processed.

Calculating Title IV Returns: It is the responsibility of the Financial Assistance Advisor to complete the calculation of Title IV returns within the timeframe required by federal regulation. It is also the responsibility of the Financial Aid Officer to notify students of their obligation to repay funds. IHCC returns the calculated amount to the Department of Education which creates a bill owed to IHCC.

Offering Post-Withdrawal Disbursements: It is the responsibility of the Financial Assistance Advisor to offer post-withdrawal disbursements to

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eligible students. Responses to post-withdrawal disbursements must be made directly to the Financial Assistance Advisor as directed in the student's offer. Disbursements are made by the Business Office as required by separation of duties regulations.

Title IV Return Calculation Procedures: The following steps outline the general procedures used to calculate a Title IV return.

Step 1: Determine the percentage of aid earned by calculating the percentage of the period that the student completed.

Step 2: Determine the amount of earned aid by applying the percentage to the total Title IV aid that was or could have been disbursed.

Step 3: Determine the amount of unearned aid by subtracting earned aid from disbursed aid *or* determine the amount of a post-withdrawal disbursement by subtracting disbursed aid from earned aid.

Step 4: If unearned funds must be returned, determine the schools and the student's shares; *or* if a post-withdrawal disbursement is due, determine the sources from which it will be funded.

Step 5: If unearned funds must be returned, allocate unearned aid to programs from which student was funded; *or* if a post-withdrawal disbursement is due, send student applicable notification.

Step 6: Return the institution's share and any funds repaid by the student or refer the student to ED; *or* make the post-withdrawal disbursement.

12.2 Withdrawal Date

Official Withdrawals:

Students wishing to withdrawal from one or more courses, or totally withdrawal from the college, must contact an Academic Advisor in the Registrars Office. If the notification is made prior to the drop deadline for the period of enrollment, a "W" will be issued to the student.

IHCC is not an institution that is required to take attendance. IHCC reports attendance on day one for the purposes of the census/Pell lock date. For students taking any 12 week (full term) courses the Pell lock date is the 9th day of the courses (following the last day for 100% refund of the courses).

668.22(b),(c)

Official withdrawal dates are provided to the Financial Assistance Advisor through the STAC screen in the Datatel system. The Financial Assistance Advisor identifies possible Title IV Return candidates by running a series of queries for financial aid recipients who have officially withdrawn from courses. The Financial Aid Assistance Advisor is responsible to review each of the student's courses to determine the student's official date of withdrawal.

668.22(1)(3)

Unofficial Withdrawals:

Federal regulations state that an institution must be able to determine the last date of attendance for those students who unofficially withdraw from school. A refund is then calculated using this date and Title IV funds are returned. The following is the procedure Indian Hills Community College uses to determine attendance dates of Title IV recipients:

1. All faculty members are required to access the IHCC Web Advisor system in order to obtain course rosters prior to the beginning of the term. The instructors then utilize this roster to report students who did not attend.
2. If a student has never attended, the instructor indicates such through the Web Advisor system. Immediately following the 8th day of the term, the Financial Assistance Director utilizes the Datatel system to query the Web Advisor system for all Title IV recipients who were reported as "never attended" and are therefore are not eligible to receive Title IV.
3. If a financial aid recipient **officially withdraws** from their courses prior to the 60% point of the student's period of attendance, a Title IV return calculation is completed utilizing the official date of withdrawal. These students are identified by the Financial Assistance Advisor by running a query in the Datatel system.
4. At the end of a term, the Financial Assistance Advisor runs a query of the Datatel system that provides the names of Title IV recipients who have been reported as having F's or a combination of F's and W's.
5. For students who **unofficially withdraw** before the 60% point of the term, IHCC utilizes the date of the midpoint of the student's period of attendance as the student's unofficial withdrawal date. Student who are awarded a

grade of “incomplete” are to have considered to have attended to the 10th week of the term.

6. Students who unofficially withdrawal and are student loan borrowers are reported to have withdrawn to the National Student Clearinghouse within 60 days of the determination of withdrawal. .

12.3 Formula Calculation

The Financial Assistance Advisor performs the calculation of all Title IV Returns. The calculation is performed on the ROFC screen in Datatel system.

The following educational expenses are considered institutional charges:

- Tuition
- Fees
- Room and Board

Each calculation is maintained in the student’s financial aid record for the applicable award year.

12.4 Returning Unearned Funds

Students are notified in writing if they owe a payment due to a Title IV return calculation. Such correspondence is sent to the student by the Financial Aid Officer, and a copy is retained with the Title IV Return calculation in the student’s file.

The portion of the unearned funds the school is responsible to pay is returned by the school immediately. The student is then notified of the school’s responsibility to return funds to the federal aid program, and is subsequently billed for any funds the school was required to return. Any funds returned by the school represents a debt owed by the student to IHCC. A student may not enroll in subsequent terms, or have academic records released, until such time that all debts have been repaid to the institution.

668.22(j)

IHCC or the student is required to return unearned financial aid assistance in a particular order when a student officially or unofficially withdrawal:

668.22(h)(4)

1. Unsubsidized Federal Direct Stafford Loans
2. Subsidized Federal Direct Stafford Loans

3. Direct PLUS Loans
4. Federal Pell Grant
5. Academic Competitiveness Grant
6. Federal SEOG

Students owing a grant overpayment are provided 45 days (15 days during the summer term) to make payment to the school, or arranged satisfactory payment arrangements, prior to IHCC referring the overpayment to the Department of Education.

It is the responsibility of the Financial Aid Officer to ensure that the overpayment is reported accurately to the Department of Education, and that overpayment information is correctly submitted to the NSDLS.

12.5 Leave of Absence

IHCC does not promote or publish a Leave of Absence policy. Students who have ceased attendance are considered to have withdrawn from the school and IHCC must perform a return of Title IV funds calculation. Students may appeal any balance due from the result of a return of funds calculation through the Dean of Student Services office.

SECTION 13: INSTITUTIONAL REFUNDS

Tuition refunds are only made during the first eight days of the term. The amount of refund is 100%. On the ninth day of the term or later no tuition refunds are made.

The refund schedule is applicable only to regular registration dates. A similar prorated refund schedule is applied to registrations occurring at a time other than the regular registration dates, e.g. summer.

Official withdrawal dates are established as the day when official withdrawal procedures were completed by the student, and are not influenced by the student's last date of attendance.

13.1 Institutional Refund Repayment Appeals

The Registrar's Office may approve an exception to the refund policy in situations that are beyond the student's control. Students who feel they have extenuating circumstances that would warrant an exception to the refund policy must appeal in writing to Registrar's Office for a Refund by Exception.

SECTION 14: TITLE IV FRAUD

14.1 Student, Institutional, and Third Party Fraud

It is the policy of the IHCC Financial Assistance Office that if the school suspects that a student, employee, or other individual has misreported information and/or altered documentation to increase student aid eligibility or to fraudulently obtain federal funds (i.e. identity theft), it must report those suspicions and provide any evidence to ED's Office of Inspector General (OIG). Any individual suspecting fraud must report their concerns to the Financial Assistance Director, who in turn must report the matter to the Dean of Student Services (who in turn may notify legal counsel).

Indian Hills Community College's Financial Assistance Office maintains a proactive stance in the identification and resolution of possibly fraudulent information. IHCC maintains a strict separation of duties as required by federal law, and proactively investigates conflicting information. Furthermore, individuals employed within the Financial Assistance Office receive training concerning the identification and resolution of cases involving possible fraudulent information.

14.2 Referrals

IHCC maintains the options of providing referrals to the OIG via a special complaint form online at www.ed.gov, or via phone at 1-800-MIS-USED.

The final determination of the need for IHCC to refer a case to the OIG is made by the Dean of Student Services with the recommendation of the Financial Assistance Director and the college's legal counsel. If a determination is made that a referral is required, the Financial Assistance Director is responsible to assist the college's legal counsel with the formatting of the official OIG referral, and the gathering of any supporting documentation.

SECTION 15: UNUSUAL ENROLLMENT HISTORY

Students who have been flagged with an Unusual Enrollment History Flag will be required to submit college transcripts for each institution attended prior to Indian Hills Community College. Unofficial copies of transcripts will not be accepted in the event a student is flagged with UEH value '3' and comment code '360'. Once all college transcripts are received, IHCC will review the transcripts. These transcripts will be reviewed to determine if the student received academic credit for the award year during which financial aid was received at those institutions and if there appears to be unusual enrollment history.

15.1 Academic Credit Earned and No Unusual History

If academic credit was earned at each of the previously attended institutions during the award year in which the student received financial aid, and no unusual enrollment history is noticed, no further documentation will be required by the student. The Financial Assistance Office will continue processing the students file to issue an award letter.

15.2 Academic Credit Not Earned or Unusual History

Beginning with the 2013-2014 year, if academic credit is not earned at each of the previously attended institutions during the award year in which the student received financial aid, or if unusual enrollment history (such as minimal progress towards course completion) is noted, the student will be required to complete the enrollment history process with the Financial Assistance. The student will be required to explain in writing why they failed to earn academic credit or why their enrollment history is unusual. Third party documentation to support the student's claim is encouraged and must be submitted at the time their written statement is submitted.

It is strongly recommended written statement be submitted as soon as possible so that results can be communicated to the student prior to the end of the 100% tuition and fee refund deadline.

Once the written statement is returned to the Financial Assistance Office it will be reviewed to determine whether the circumstances as evidenced by the student's academic records and the other documentation support the continuation of financial aid eligibility (reference section 479A of the Higher Education Act (HEA)). Like professional judgment, this decision is final and not appealable to the Department of Education. The student will be notified of the approval or the denial of financial aid via letter generated by the Financial Assistance Office.

15.3 Approval of Continued Eligibility

Students may be approved to receive financial aid, and will be required to maintain the standards outlined in IHCC's Satisfactory Academic Progress Policy.

15.4 Denial of Continued Eligibility

Students who have been **denied** financial aid **will not be eligible** to receive financial aid and **must pay** tuition and fees out of pocket in future terms.

15.5 Reinstatement of Aid Eligibility

Beginning with the 2013-2014 academic year, in order for students to regain eligibility for financial aid (if denied continued eligibility), the student will be required to successfully complete at least 6 credit hours at IHCC and achieve a cumulative GPA of 2.0 or higher. If these conditions are met it is the student's responsibility to notify the Financial Assistance Office and request that their financial aid be reviewed for reinstatement.

15.6 Financial Aid Satisfactory Academic Progress Policy

Requirements and standards of the Financial Assistance Satisfactory Academic Progress Policy are applicable and must be adhered to.

15.7 Authority

The authority for IHCC to deny Title IV, HEA program assistance under the circumstances described in this policy is section 484(a)(4)(A) of the Higher Education Act of 1965, as amended, which requires the student to sign a Statement of Educational Purpose. By signing the Statement of Educational Purpose as part of the student's submission of the FAFSA, the student certified that he or she would use the Title IV, HEA program assistance received only to meet educational costs. (See also 34 CFR 668.32(h) and GEN 13-09).