# Financial Assistance Policies and Procedures Handbook

2024-2025



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## INTRODUCTION

The Policy and Procedures Manual defines general institutional policies as they relate to basic statutory and regulatory provisions of federal and institutional programs of financial aid. This manual provides a description of standard operating duties of university personnel as they relate to the requesting, receiving, disbursing, accounting for, and reporting upon the utilization of student financial aid funds. This manual, when used in conjunction with the other manuals and references, is intended to be an operational guide to the Financial Aid Department staff in the daily administration and management of the office. If no policy or procedure addresses a given issue, the Financial Aid Department staff is expected to use professional judgment based upon the intent of all financial aid programs, the Federal Student Aid Handbook and office practices.

- Federal Register
- FSA Partner Connect
- Department of Education Financial Student Aid Handbook
- Department of Education, Audit Guide
- Dear Colleague Letters and other financial aid legislation and other laws or regulation that impact student aid

# INSTITUTIONAL POLICIES AND RESPONSIBILITIES

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Western State College of Law shall comply with all federal regulations which, when practiced in their entirety, constitute a viable management structure for student financial aid programs.

The Financial Aid Department was created to coordinate all student federal financial aid programs at Western State College of Law and to execute the student financial aid application and subsequent awards.

Below is a list of applicable policies to be incorporated within the daily operational flow of the Financial Aid Department.

 In accordance with established procedures, all students applying for financial aid assistance must submit the appropriate forms to the Financial Aid Department and complete any other processes deemed necessary for financial aid payments until all

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necessary documents and applications are on file with the Financial Aid Department at Western State College of Law.

# FINANCIAL AID PHILOSOPHY

At Western State College of Law, we are committed to providing equitable access to quality education by minimizing financial barriers for students. Our financial aid programs aim to:

- Promote academic success by supporting students in meeting their educational goals.
- Ensure fairness and consistency in awarding aid, in compliance with federal and institutional regulations.

By upholding these principles, we strive to create an inclusive and supportive environment where all students have the opportunity to succeed.

#### **Purpose**

The Financial Aid Office at Western State College of Law is dedicated to supporting the academic success and financial well-being of students by providing equitable access to financial resources. Our purpose is to:

- 1. Assist students in navigating the financial aid process with transparency, integrity, and professionalism.
- 2. Administer federal, institutional, and external financial aid programs in compliance with all applicable regulations and policies.
- 3. Promote access to higher education by reducing financial barriers and empowering students to make informed financial decisions.
- 4. Provide personalized counseling and financial literacy education to support responsible borrowing, budgeting, and financial planning.

Through these efforts, we strive to create an inclusive environment where students can focus on achieving their educational and career goals while fostering a partnership in financial responsibility.

- The Financial Aid Department will respect the confidentiality of student records and protect the privacy of students as set forth in the Family Educational Rights and Privacy Act (FERPA) of 1974. To protect the privacy of students and families, federal law sets certain conditions on the disclosure of personal information from records kept by schools that participate in the Student Financial Aid Programs.
- 2. Monitor communication channels so that the students personally relate any financial aid status changes to the Financial Aid Department. Whenever information about a change

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in student financial aid status is received, the Financial Aid Department must verify continued eligibility on all funds awarded.

3. Work closely with the Admissions Office, Student Accounts, faculty and staff as needed.

# **CODE OF CONDUCT**

- 1. No action will be taken by financial aid staff that is for their personal benefit or could be perceived to be a conflict of interest.
  - Employees within the financial aid office will not award aid to themselves or their immediate family members. Staff will reserve this task for an institutionally designated person, to avoid the appearance of a conflict of interest.
  - No amount of cash, gift, or benefit in excess of a de minimis amount shall be accepted
    by a financial aid staff member from any financial aid applicant (or his/her family), or
    from any entity doing business with or seeking to do business with the institution
    (including service on advisory committees or boards beyond reimbursement for
    reasonable expenses directly associated with such service).
- 2. Information provided by the financial aid office is accurate, unbiased, and does not reflect preference arising from actual or potential personal gain.
- 3. Institutional financial aid offers and/or other institutionally provided materials shall include the following:
  - Breakdown of estimated individual Cost of Attendance components, including which are direct (billed by the institution) costs vs. indirect (not billed by the institution) costs
  - Clear identification and proper grouping of each type of aid offered indicating whether the aid is a scholarship or loan.
  - Standard terminology and definitions, using NASFAA's glossary of terms
  - Renewal requirements for each aid type being offered as well as next steps and financial aid office contact information
- 4. Financial aid professionals will disclose to their institution any involvement, interest in, or potential conflict of interest with any entity with which the institution has a business relationship.

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# FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT (FERPA) OF 1974

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The college of law complies with all applicable laws and regulations relating to student privacy and rights pertaining to education records under the Family Education Rights and Privacy Act (FERPA) of 1974.

The FERPA form is available here: FERPA FORM

#### **Eligibility**

FERPA applies to any schools that receive funding from the Department of Education (DOE). When a student turns **18 years old (majority age) or attends an institution of postsecondary education at any age, they become an "eligible student,"** and all FERPA rights transfer from the parent to the student. For more information about parental rights under FERPA, visit this page on the DOE website. Additionally, Part B of the Individuals with Disabilities Education Act (IDEA) protects that confidentiality of personally identifiable information (PII).

#### **Protected Records**

FERPA is administered by the Student Privacy Policy Office (SPPO) in the Department of Education (DOE).

**FERPA protects "education records,"** which are any records directly associated with the student and maintained by the educational agency or institution, or a party acting on behalf of the school (such as an employee or consultant). FERPA maintains certain exceptions to education records, such as law enforcement records; more information can be found on this page on the DOE website https://studentprivacy.ed.gov/guidance

Protections, and Allowances

#### Eligible students are granted:

#### (1) ACCESS to Their Education Record

Students have the right to inspect and review their education records, and may do so by making an oral or written request to the school official responsible for the requested record. The official must respond within 45 days of the request by sending the student a copy of the requested record or by arranging an appointment for the student to review it.

Students may waive their right to access confidential letters of recommendation that they seek for admission to any educational agency or institution for employment, or application for an honor or honorary recognition. Students must be notified of requests of all such individuals furnishing recommendations, and the letters must be solely for

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the stated purpose for which the student was notified and for which they waived their right of access. Such waivers may not be required as a condition for admission to, receipt of financial aid for, or receipt of any other services or benefits from such an agency or institution. Where any such records, files, or data contain information related to a third-party, the student is entitled to be informed of only the portion of that record as it pertains to them.

Each record-keeping unit of the school will establish procedures for accommodating requests for access to administrative charge not exceeding the actual cost to the school for providing access to a student is entitled to copy privilege regarding their records, files, and data at a reasonable administrative cost.

#### (2) AMENDMENT of Their Education Records

Eligible students have the right to an explanation of any information contained in their record, and to request amendments or corrections to their education records if they believe them to be inaccurate, misleading, or in violation of their privacy. While a school is not required to grant the request, it is required to consider the request and notify the student of the decision and the student's right to a hearing and—upon denial of the amendment—insertion of a statement in their record regarding the contested information. Eligible students substantive education records, such as academic or disciplinary records and FERPA may not require schools to make these amendments.

#### (3) DISCLOSURE of Their Education Records

Educational records of the student, or the contents thereof, are not released to the student, their parents, or any third party if the student remains in an unresolved academic issue or disciplinary matter. This limitation does not preclude students from having personal access to their records, merely from obtaining the release of the information.

#### Disclosure to Third Parties

Disclosure of information contained in student records, files, and the student normally controls data. Such disclosures will be made to someone other than an institutional official having a legitimate educational interest in the records only on the condition that prior written consent is obtained from the student. The third party is to be reminded that they should not permit additional access to the information by an additional person without further written consent of the student prior to such an additional transfer of information.

When information on a student must be shared outside the school, all persons, agencies, or organizations desiring access to the records of a student shall be required to sign a written form, to be kept permanently with the file of the student, indicating specifically the legitimate educational or other interests in seeking this information. This form will be available solely to the student and to the university officer responsible for the record as a means of auditing the operation of the record system.

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#### Disclosure to Other Educational Institutions

Disclosure of appropriate academic records may be made to officials of other educational institutions to which the student has applied and where he/she intends to enroll.

#### Disclosure Pursuant to Judicial Order

Information concerning a student shall be released if properly subpoenaed pursuant to a judicial, legislative, or administrative proceeding. Effort will be made to give advance notice to the student of such an order before compliance by the institution.

#### Disclosure Pursuant to Requests for Financial Aid

Necessary academic and/or financial student records may be disclosed without the student's prior consent in connection with the student's application for, or receipt of, financial aid.

#### Disclosure to Federal and State Authorities

This policy shall not preclude access to student records by authorized federal and state officials in connection with the audit and evaluation of federally supported education programs or in connection with enforcement of federal and state legal requirements that relate to such programs. Except when collection of personally identifiable data is specifically authorized by federal and state law, any data collected and reported with respect to an individual student shall not include information (including social security number) that would permit the personal identification of such student.

## Disclosure Under Emergency Conditions

On an emergency basis, a designated school officer may release information about a student when that information is necessary to protect the health or safety of a student.

#### Disclosure to Educational Agencies and Institutions

Information that will not permit the individual identification of students may be released to organizations of educational agencies or institutions for the purpose of developing, validating, and administering predictive tests and measurements. Similarly, information may be released to accrediting organizations in order to carry out their accrediting functions.

#### Exceptions to Prior Written Consent: Disclosure Without Consent

- 1. "School officials" of postsecondary institutions may access PII if they have a legitimate educational interest in the information. Additionally, the school's annual notification of rights under FERPA must include the criteria for "school officials" and "legitimate educational interests." The "school official" exception under FERPA also includes contractors, consultants, volunteers, or other third-party services outsourced by the school, provided that they:
  - a. Perform a function or service for which the school would otherwise use employees;
  - b. Are under the direct control of the school regarding use and maintenance of education records;
  - c. Are subject to FERPA requirements for the use and redisclosure of PII; and

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- d. Meet the school's definitions for "school official" with "legitimate educational interest" that goes out in the annual report on FERPA rights.
- 2. FERPA permits the disclosure of PII to another school where a student "seeks or intends to enroll," or where they are already enrolled—as long as the information is related to their enrollment or transfer. Disclosure without consent is permitted as long as reasonable attempts were made to notify the students, or if the annual notice of student rights related to FERPA contains a statement explaining that the school forwards PII related to enrollment or transfer to schools that request it. The disclosed records must be provided to the eligible students if requested and, if requested, the student must be provided a hearing and an opportunity to request amendment to the education records.
- 3. FERPA also permits the disclosure of PII without consent when it has been appropriately identified as "directory information," which is information generally not considered harmful to students if disclosed. WSCL may disclose directory information for any purpose at its discretion without the consent of the student. However, students 18 years of age and older, or the parents or guardians of dependent students, may request that the university not release their directory information. WSCL considers the following information is considered directory information:
  - A. Name
  - B. Major/Field of Study
  - C. Part-time/Full-time Enrollment Status
  - D. Dates of Attendance (including matriculation and/or withdrawal dates)
  - E. Academic Classification (by year)
  - F. Degrees and Awards
  - G. The most recent previous educational agency or institution attended
  - H. Photograph

Violations of this policy are treated seriously. Employees' failure to comply with this policy may lead to discipline, up to and including termination. Student workers employed by the university who violate this policy may be terminated from their jobs and may also face discipline under the Student Code of Conduct. Others covered by this policy may lose opportunity to contract with, volunteer for, or otherwise provide service to the university. Violations might also subject the violator to criminal or civil prosecution under federal or state laws.

For more information about the rights, protections, and allowances regarding student records, please reference the United States Department of Education (DOE)'s <u>An Eliqible Student Guide to FERPA.pdf - Google Drive</u>

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#### **Buckley Amendment**

A student's academic records, grades, and personal information, as in compliance with the Buckley Amendment (Public Law 93-380, Section 438) may not be provided to third parties without his/her written consent. Permission must be given by the student in order for the information in his/her file to be used as reference checks for credit or employment evaluation by third parties, and the student must file with the University Registrar a declaration to this effect that will be kept in the student's file. The provision to release financial data or related information to authorized state and/or federal agencies is not a violation of the Buckley Amendment.

#### Disclosure of Student Records

FERPA requires that a student's education records be:

- Disclosed *only* to persons who meet the strict definition of a school official who has a legitimate educational interest in the records (or others explicitly granted access under the law). Contact the Registrar's Office for a complete listing of these individuals.
- 2. Made available within 45 days of the student's written request for inspection and review.

#### A school official is defined as:

- 1. A person employed by the school in an administrative, supervisory, academic, research, or support staff position.
- 2. A student, alumnus, or other person who is serving on an official committee (e.g., disciplinary, grievance) or is assisting a school official in a task.
- 3. A trustee or outside contractor (e.g., health or medical professional, attorney, auditor) acting as an agent for the school.

A University official has a legal right to know if a person defined as having a legitimate educational interest is:

- 1. Performing a task that is specified in his/her position or related to student discipline.
- 2. Providing a service or benefit related to a student/a student's family, or maintaining safety and security on campus.

An example of legitimate educational interest would be an advisor who needs to review a student's education record to determine what courses have been or need to be completed; this task is related to student advising. The advisor would not be authorized to view education records that are not relevant to the task at hand. *Curiosity does not qualify as a legal right to know.* 

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Those who receive student record information may use it only for the purpose specified. If a third party discloses personally-identifiable student information in violation of FERPA, the educational agency or institution which disclosed the information to the third party is prohibited from permitting access to education records to that third party for a period of not less than five years.

Parents have the right to expect confidentiality of certain types of information about them in student records and, under certain conditions, to gain access to information in student education records. For purposes of FERPA, the University considers all students to be independent; this limits the student education record information that may be released to parents (without the student's specific written permission) to Directory Information only.

#### **Directory Information**

The University complies with all applicable laws relating to personal privacy, including the Family Education Rights and Privacy Act (FERPA) of 1974. The University has designated certain information contained in the education records of its student as directory information for purposes of the Family Educational Rights and Privacy Act (FERPA).

The following information regarding students is considered directory information:

- 1. Name
- 2. Major Field of Study
- 3. Part-time/Full-time Enrollment Status
- 4. Dates of Attendance (including matriculation and withdrawal dates).
- 5. Academic Classification by Year
- 6. Degrees and Awards Received
- 7. The Most Recent Previous Educational Agency or Institution Attended by the Student
- 8. Student's Photograph

This institution may disclose directory information for any purpose in its discretion, without the consent of a student. Students have a right, however, to refuse to permit the designation of any or all of the above information as directory information. In that case, this information will not be disclosed except with the consent of a student, or as otherwise allowed by FERPA.

Westcliff University Financial Aid personnel will undergo initial FERPA training upon hire, and undergo annual FERPA from a source to be determined.

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# GENERAL REQUIREMENTS FOR STUDENT ELIGIBILITY FOR FINANCIAL AID

Students applying for federal financial aid programs must:

- · Must have a financial need
- Be a citizen or an eligible non-citizen
- Be enrolled in an eligible program of study
- Not be in default on any National Direct Student Loan, Guarantee Student Loan or owe a refund on any Title IV Grants at any institutions previously attended

#### **Basic Information**

It is the student's personal responsibility to obtain all of the information necessary for financial assistance. Students must submit the *Free Application for Federal Student Aid (FAFSA)* to the U.S. Department of Education's FAFSA Processing System (FPS), if you want to be considered for federal and state financial aid. The FAFSA is available in paper and electronic formats. You can get the paper version by calling 1-800-4- FED-AID. We encourage students to fill out a webbased version of the FAFSA at www.studentaid.gov. An FSA ID is required to complete the FAFSA application. The FSA ID is the student's username and password to the FAFSA and other Federal Student Aid websites. Students can go to studentaid.gov

After the application is completed, it is sent to the Department of Education FAFSA Processor. The data input will then be sent to the FAFSA Processing System (FPS) to calculate the Student Aid Index and match the student's data against a number of databases, such as the Social Security Administration's citizenship database, Veterans Affairs, etc. After all processing is complete, you will receive your FAFSA Submission Summary (FSS) in about 4-6 weeks after submitting a paper application, 1-5 days after submitting a web based application and the University will receive an Institutional Student Information Record (ISIR) in the same time period. Westcliff University will review the ISIR or FSS produced to determine student's eligibility.

# Student Rights and Responsibility

Students have the right to know:

- What financial aid is available and how to apply for it;
- How the institute selects students to receive financial aid;
- How does financial aid determine the offer;

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- How were changes to offer made;
- · What accreditations does the institute have;
- What programs are offered, what facilities it has, who is on the faculty and staff;
- What is the cost of attendance;
- What it takes to make satisfactory progress and be in good academic standing;
- That information regarding student information is handled with the highest degree of confidentiality;
- How to receive counseling about financial aid.

# AVAILABLE STUDENT FINANCIAL AID

The college complies with the regulations pertinent to each of the financial aid programs for which it has been approved. The following is a description of the financial aid programs available at Western State College of Law. Additional information can be obtained through the Financial Aid Department.

# FEDERAL DIRECT LOAN PROGRAM

https://studentaid.gov/understand-aid/types/loans/subsidized-unsubsidized

Federal Direct Loan Programs are administered by the Department of Education for qualified students. The Federal Direct Unsubsidized Stafford, and Federal Direct PLUS (Graduate PLUS) loans are available through this program.

## Federal Direct Unsubsidized Stafford Loan

Unsubsidized Stafford Loan programs are available for students to borrow for additional education costs. Students can borrow up to \$20,500 for each academic year. Interest payments begin immediately after the loan is fully disbursed or may be added to the principal balance. Regular payments begin six months after students cease enrollment or fail to carry at least half the normal, full-time school enrollment.

# Federal Direct PLUS Loans (Graduate PLUS)

Federal Direct Graduate PLUS loans provide additional funds for creditworthy graduate degree students to help pay for educational expenses. The interest rate for these loans is published on studentaid.gov and multiple repayment options are available. The repayment for Graduate

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PLUS loan borrowers is automatically deferred. Interest will capitalize during the deferment, but borrowers will have the option to make interest payments while the loan is deferred.

## APPLICATION PROCEDURE

- 1. Create an FSA ID at studentaid.gov
- 2. Complete and submit the Free Application for Federal Student Aid (FAFSA) each award year and wait to receive a FAFSA Submission Summary (FSS).
- 3. Submit additional documents if requested by FAFSA and indicated on the FSS.
- 4. Complete required Western State College of Law financial aid forms for student's financial aid package.
- 5. Complete student loan entrance counseling and master promissory note (if using loans).
- 6. Have an acceptance letter from the Admissions Office.
- 7. Receive the financial aid award notice to be signed and submitted back to the office of financial aid.

# COST OF ATTENDANCE (COA)

https://studentaid.gov/help-center/answers/article/what-does-cost-of-attendance-mean

Western State College of Law has adopted the Cost of Attendance (COA) methodology provided by the California Student Aid Commission (CSAC). The CSAC COA is designed to reflect reasonable and necessary expenses students are likely to incur while pursuing their education. This approach ensures consistency with state guidelines and provides students with a fair assessment of their financial needs.

The COA includes both direct and indirect expenses for an academic year and is established for WSCL student population.

#### Components of the Cost of Attendance

- 1. Tuition and Fees
  - Direct charges for enrollment, including mandatory fees as published in the student catalog.

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#### 2. Room and Board

 Estimated living expenses for students living off-campus, or at home with parents.

#### 3. Books and Supplies

• Estimated Cost for required course materials, textbooks and other supplies.

#### 4. Transportation

Estimated cost for travel to and from campus for program related activities.

#### 5. Personal Expenses

 Estimated miscellaneous expenses for personal items, healthcare, and other necessary services

#### 6. Loan Fees

Estimated federal loan origination fees for students who borrow Title IV loans.

The Financial Aid Office reviews and updates the COA annually in alignment with CSAC guidelines and institutional data to reflect changes in economic conditions, tuition rates, and relevant factors.

The COA is published on the institutional Financial Aid website and is made available to all students. Students are encouraged to review the COA and contact the Financial Aid Office with any questions or special considerations that may impact their individual COA.

# ACADEMIC YEAR DEFINITION

https://studentaid.gov/help-center/answers/article/academic-year

An academic year is defined as a minimum of: 12 credit hours and 32 weeks of instruction for graduate students, for Title IV purposes.

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| Enrollment Status         | Credits Required               |
|---------------------------|--------------------------------|
| Full-Time Status          | 12+ credit hours per semester  |
| 1/2 Time Status           | 6-10 credit hours per semester |
| Less than 1/2 Time Status | 1-5 credit hours per semester  |
|                           |                                |

| Graduate Length                        |  |
|--|--|
| Juris Doctor                           |  |
| 1 academic year = 2 semesters per year |  |
|  |  |

# AWARDING OF FEDERAL AID (TITLE IV)

All Title IV funds are awarded based on the information received from the FAFSA. You must complete the FAFSA to be eligible. The FAFSA can be found at studentaid.gov.

Based on a student's enrollment and housing plans an estimated Cost of Attendance (COA) will be assigned for packaging purposes.

All known institutional and outside scholarships are applied first.

Eligibility for Unsubsidized Direct Loans will be calculated and added to the package.

Graduate students are only eligible for Unsubsidized Direct Loans and Grad Plus Loans. A COA is calculated based on the academic program to establish the amount that can be borrowed. A FAFSA form is still necessary to gather the information required for students to participate in the federal loan programs.

# **VERIFICATION POLICY**

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#### **Notification Process**

Students selected for verification will be notified through one or more of the following methods:

- Email
- In-person contact

#### Notifications will include:

- 1. Specific verification forms required.
- 2. A list of necessary supporting documents.
- 3. Instructions for submission and deadlines.

#### **Verification Requirements**

#### 1. Documentation:

Students may be required to submit:

- o Institutional verification forms.
- IRS Tax Return Transcripts or signed copies of tax returns.
- o W-2 forms.
- o Documentation of untaxed income, such as:
  - Child support received or paid.
  - Untaxed IRA and Keogh plan contributions.
  - Interest on tax-free bonds.
  - Workers' compensation.
  - Cash received or money paid on the student's behalf not reported elsewhere.
- o Proof of high school completion status.
- Identity and Statement of Educational Purpose (if required).

#### 2. Verification Data Elements:

The following items may be verified:

o Household size.

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- o Adjusted Gross Income (AGI).
- U.S. income tax paid.
- Income earned from work.
- Untaxed income and benefits.

#### 3. Correction and Resolution:

If discrepancies are identified, students must provide corrected information or additional documentation. The school will make necessary corrections and update the FAFSA® through CPS, if required.

#### Student Responsibilities

- 1. Students must provide requested documentation to the Financial Aid Department within **30 days of notification**.
- 2. Failure to complete verification will result in the inability to process or disburse financial aid.
- 3. Students are responsible for ensuring the accuracy of submitted documentation and for responding promptly to any additional requests for information.

#### Revised Financial Aid Offers

If the verification process results in changes to the student's FAFSA® information, the Financial Aid Department will:

- 1. Recalculate the student's eligibility.
- 2. Adjust the financial aid offer accordingly.
- 3. Notify the student of any changes via email.

#### Referral of Fraud or Misconduct

In cases of suspected fraud or criminal misconduct related to a student's financial aid application, the school will refer the case to the **Office of Inspector General (OIG)** for investigation, as required by federal regulations.

#### **Deadlines and Timing**

1. Students must complete the verification process before any federal or institutional aid is disbursed.

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2. Verification must be completed within the award year deadlines specified by the U.S. Department of Education.

#### **Annual Review**

This policy is reviewed annually and updated to ensure compliance with the most recent federal guidelines, including the FSA Handbook and **34 C.F.R.** § **668.53**.

# ADMINISTRATIVE REVISIONS TO FINANCIAL AID PACKAGE

The Financial Aid Department reserves the right to revise your aid package without prior notice. These reasons include but are not limited to:

- Outside aid received is higher than originally assumed
- Outside resources were not taken into account
- Factors make the student ineligible for the aid offer
- Enrollment status changes
- Insufficient information

# RECALCULATION OF ELIGIBILITY

\_\_\_\_\_

A student will be paid based on their most current FSS SAI and enrollment status within each term. If a new or updated FSS is received after the semester census date, then Title IV funds will be recalculated based on the new or updated FSS.

If an adjustment is made to a student's financial aid package, the Financial Aid Department will release a revised offer to the student via email.

# PROFESSIONAL JUDGMENT

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If the student finds his or herself in an unusual circumstance that may affect their Title IV eligibility, the Financial Aid Department staff, using professional judgment, can adjust one or more of the data elements used to calculate the SAI or COA depending on the circumstances. The adjustment must be based on a student's individual circumstances and must be documented in the student's file. Students can request a professional judgement adjustment

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with the Financial Aid Department to initiate this process. Professional judgement requests are handled on a case by case basis.

The Financial Aid staff will note in the student's records any unusual situation that explains any special consideration given to the student when determining financial need. Students will need to provide documentation. Professional judgment documentation must be cited in the student file with appropriate documentation attached. Changes to student applications made as a result of professional judgment do not renew each award year. Students will need to request a professional judgment review each award year, and provide updated documentation.

# STUDENT LOAN COUNSELING (ENTRANCE AND EXIT COUNSELING)

https://studentaid.gov/entrance-counseling/ https://studentaid.gov/exit-counseling/

To ensure compliance with federal regulations and provide students with the necessary information and resources to make informed decisions about borrowing and repaying federal student loans.

#### Scope

This policy applies to all students who borrow federal student loans (Direct Loans, FFEL Loans, etc.) and are required to participate in entrance and exit counseling.

#### Policy Overview

Western State College of Law will offer required entrance and exit counseling to federal student loan borrowers in compliance with the following regulations:

- 34 CFR 685.304(b) Direct Loan Entrance and Exit Counseling
- 34 CFR 668.42 Institutional Disclosure Requirements (pertaining to exit counseling)

#### **Entrance Counseling**

#### 1. Required Participation:

 Entrance counseling is mandatory for all first-time federal student loan borrowers before they receive their loan disbursement.

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 This applies to both undergraduate and graduate students borrowing federal Direct Loans (Subsidized, Unsubsidized, PLUS loans).

#### 2. Timing and Delivery:

- Entrance counseling will be completed online on studentaid.gov
- The completion of this document is required to provide a student with a financial aid award offer.

#### 3. Content of Counseling: The entrance counseling must cover, at a minimum:

- The student's rights and responsibilities regarding the loan.
- A clear explanation of the loan terms, including interest rates, repayment options, and the impact of loan consolidation and deferment.
- o Information on available repayment plans and loan forgiveness programs.
- A description of how the loan servicer will manage the loan and the borrower's role in communication with the servicer.
- Budgeting tips to help students manage educational expenses and loan repayment.
- Warning about the consequences of defaulting on the loan, including the impact on credit scores and future loan eligibility.

#### 4. Recordkeeping:

• The university will maintain records of all students who complete entrance counseling, including confirmation of completion and the date it was completed.

#### Exit Counseling

#### 1. Required Participation:

- Exit counseling is mandatory for all federal student loan borrowers when they graduate, withdraw, or drop below half-time enrollment.
- Students must complete exit counseling prior to the conclusion of their final semester or before leaving the school.

#### 2. Timing and Delivery:

- Exit counseling is offered online at studentaid.gov
- The school will send a reminder to students at least 30 days before the expected date of graduation or withdrawal, informing them of their requirement to complete exit counseling.

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• Exit counseling must be completed no later than 30 days after the student's withdrawal, graduation, or drop in enrollment status.

#### 3. Content of Counseling: The exit counseling must cover, at a minimum:

- A detailed explanation of the borrower's rights and responsibilities after leaving school.
- Loan repayment terms, including interest rates, deferment options, and repayment plans.
- The options available to students who are unable to make payments, including deferment, forbearance, and income-driven repayment plans.
- A clear explanation of the loan servicer(s) and how to contact them for assistance.
- o Information about the consequences of defaulting, including default-related penalties and how default affects a borrower's credit.
- Resources for managing loan repayment and a link to the National Student Loan Data System (NSLDS) to view loan balances and servicer contact information.

#### 4. Recordkeeping:

 The university will maintain records confirming that the student was notified to complete the exit counseling including the date of the notification

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# ANNUAL AND AGGREGATE STUDENT LOAN LIMITS

|                                   | GRADUATE and PROFESSIONAL DEGREE                                     |
|-----------------------------------|--|
|                                   | Annual<br>Limit  |
|                                   | \$20,500 - All<br>graduate loans are<br>unsubsidized as of<br>7/1/12 |
| TOTAL<br>AGGREGATE<br>LOAN LIMITS | \$138,500.00   |

# **DISBURSEMENT OF REFUNDS**

Student loans are a great responsibility and should be used as a tool to achieve one's educational goals. Western State College of Law understands that excessive student loan borrowing may result in the student experiencing difficulties during the repayment period.

As a result, Western State College of Law will recommend limiting credit balances (resulting from student loans) on student accounts when possible. Under HEA Sec. 479(A)(c), 34 CFR 685.301(a)(8), schools may not limit student Direct Loan borrowing. If a student requests to maximize their respective loans for the applicable loan period (up to the annual loan limits or Cost of Attendance), the University will honor the request. All Title IV refunds will be refunded within 14 from when the financial aid credit balance occurs on a student's ledger card.

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# RECORDS RETENTION

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Student records are maintained on-line for a minimum of five (5) years after and the institution keeps records of student transcripts permanently.

# SATISFACTORY ACADEMIC PROGRESS (SAP)

Satisfactory Academic Progress for Degree Programs

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#### **Purpose**

The Satisfactory Academic Progress Policy outlines the expectations and criteria for satisfactory academic progress for students at Western State College of Law. This policy aims to ensure that students maintain consistent academic performance, meet program requirements, and make timely progress towards their educational goals.

#### Definition of Satisfactory Academic Progress

Satisfactory Academic Progress (SAP) is a measure of a student's successful completion of coursework and progression toward the completion of their degree or program. SAP is evaluated based on quantitative (e.g. completion rate or pace) and qualitative (e.g., GPA) criteria.

#### **Evaluation Period**

SAP will be assessed at the end of each semester to determine if students are meeting the established criteria. This includes regular semesters, summer sessions, and any other terms as applicable.

#### Academic Probation Status/Financial Aid Probation Status

- Students who do not meet SAP criteria for the first time must submit an appeal (see Appeal Process) to be placed on Academic Probation/Financial Aid status.
- Students on Academic Probation/Financial Aid status will have an Academic Plan that outlines specific criteria achieving satisfactory academic standing.

#### Academic Disqualified

 Students on Academic/Financial Aid Probation who do not meet SAP according to their outlined Academic Success Plan will face Academic Disqualification.

#### Academic Dismissal

• Students that do not meet SAP after an evaluation period and do not submit an approved appeal to go onto Academic Probation will be Academically Dismissed.

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#### **Appeal Process**

- Students may appeal to be on Academic/Financial Aid Probation and Financial Aid eligible by submitting a written appeal to the Satisfactory Academic Progress Appeals Committee
- The Appeal must include a detailed explanation of the circumstances leading to academic difficulties and an Academic Success Plan for improvement.

# INSTITUTIONAL REFUND POLICY

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The student has the right to cancel the enrollment agreement and obtain a refund of charges paid through attendance at the first class session. In addition, the student may cancel, withdraw, or drop a course after instruction has started and is within add/drop period to request a prorated refund for the unused portion of the tuition. Refunds are calculated based on the week that the student withdraws from the University. Below you will find some examples of the refund calculated. The University's institutional refund policy is separate from the Federal Return of Title IV Funds (R2T4) calculation.

The Student Accounts Office completes an Institutional Refund Calculation for all students who withdraw or are dismissed from Western State College of Law.

# RETURN OF TITLE IV FUNDS (R2T4)

#### How a Withdrawal Affects Financial Aid

This policy outlines the process for the return of unearned Title IV funds (loans) when a student receiving federal financial aid withdraws, ceases attendance, or fails to complete the period for which they were awarded aid. The policy ensures compliance with federal regulations [34 CFR § 668.22; 34 CFR § 668.43; 34 CFR § 668.41(a)] and informs students of their responsibilities and potential financial liabilities. This policy is subject to revision without notice based on changes to federal laws and regulations or Western State College of Law policies. If changes are made, the student is held to the most current policy.

#### Scope

This policy applies to all students receiving Title IV aid:

Title IV (federal) financial aid funds are awarded under the assumption that a student will remain in classroom attendance for the entire period (term) for which the funds were awarded.

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When a student withdraws from all courses, regardless of the reason, s/he may no longer be eligible for the full amount of Title IV funds originally awarded. The return of funds to the federal government is based on the premise that a student earns financial aid in proportion to the length of time during which s/he remains enrolled. A prorated schedule determines the amount of federal student aid funds s/he will have earned at the time of full withdrawal. For example, a student who withdraws in the second week of the term has earned less of his/her financial aid than a student who withdraws in the third week. Once the 60% point in the term is reached, a student is considered to have earned all of the financial aid originally awarded and will not be required to return any funds.

Federal regulations require a recalculation of financial aid eligibility if a student:

- 1. Completely withdraws;
- 2. Stops attending before the term's end;

Western State College of Law students who receive federal financial aid and who do not remain in attendance through the end of the term could be responsible for repaying a portion of the financial aid originally received. Students who do not begin attendance in classes are not eligible for federal financial aid.

**Note:** Western State College of Law institutional tuition refund policy is separate from federal regulations to return unearned aid. Receiving a tuition/fee refund from Western State College of Law has no impact on the amount the student must repay to federal aid programs.

#### Return of Title IV Funds Process

Financial aid recipients "earn" the aid they originally received by remaining in classes. The amount of federal assistance earned is based on a prorated system. Students who withdraw or do not complete all classes in which they were enrolled may be required to return some of the aid originally awarded. Western State College of Law is required to determine the percentage of Title IV aid "earned" by the student and return the "unearned" portion to the appropriate federal aid programs.

#### Determination of Withdrawal Date

The withdrawal date used in the R2T4 calculation is the actual last date of attendance or communication from the Office of the Registrar.

#### Withdrawal Prior to the 60% Point of a Payment Period

Unless and until a student completes 60% of the term in which financial aid was awarded, the student will be required to return all or part of the financial aid originally awarded for the term. The R2T4 calculation is not required (but may be performed) if students complete over 60% of the payment period.

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#### Order of Return to Federal Aid Programs

In accordance with federal regulations, unearned aid will be returned to the federal programs in the following order:

- 1. Federal Direct Loans: Unsubsidized
- 2. Federal Direct Graduate Plus Loans

# LEAVE OF ABSENCE POLICY

Students enrolled in term enrollment programs that are unable to enroll in one or more terms may apply for a temporary Leave of Absence (LOA) from the university. This policy is designed to allow a student the flexibility to take a temporary break from their academic program and upon return a student will not be required to apply for readmission to the school. An R2T4 will be completed.

Important facts concerning a Leave of Absence:

A student will not be eligible to receive federal student aid while on a LOA;

# DEFAULT PREVENTION AND MANAGEMENT PLAN

The ultimate purpose of the Default Prevention and Management Plan is to assure that student loan borrowers who attend Western State College of Law successfully repay their student loans. The school understands that situations arise where students experience a temporary setback in their repayment schedule. Western State College of Law wants student loan borrowers to know all the options available to them from the grace period all the way through the repayment period. Below are methods Western State College of Law promotes responsible student loan borrowing:

- Keeps in touch with its borrowers.
- Provide students with information about IonTuition and their default prevention assistance and education.
- IonTuition tracks borrowers' delinquency status by obtaining reports from Federal Family Education Loan Program guarantee agencies and lenders and from the U.S. Department of Education for Federal Direct Loan Program borrowers.

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#### Reminders about Personal Financial Management and Title IV Loans

- IonTuition is available to provide financial literacy resources to borrowers at enrollment, throughout attendance, and following graduation or withdrawal;
- Students are reminded to borrow only what is needed and can cancel or return any funds in excess of what is needed;
- Borrowers must inform their federal loan servicer immediately of any change of name, address, telephone number, or social security number;
- If a borrower is unable to make a scheduled payment, he or she should contact the lender before the payment's due date to discuss a change in repayment plan, repayment options, and deferment and forbearance options.

# **VETERANS EDUCATION BENEFITS**

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Western State College of Law proudly supports America's veterans. We are committed to serving them with the same integrity with which they served our country. Our goal is to provide them with the education they need to help them to pursue and achieve the success they deserve. Below is a summary of the veteran's education benefits that are currently available to eligible service members.

VA pays benefits to eligible Service Members and Veterans pursuing an approved education or training program. There are education benefit programs that cover Active Duty, National Guard, and Reserve Service Members and Veterans:

- Post-9/11 GI Bill (Chapter 33)
- Yellow Ribbon
- Montgomery GI Bill-Active Duty (Chapter 30)
- Montgomery GI Bill-Selected Reserve (Chapter 1606)
- Survivors and Dependents Assistance (Chapter 35)
- Vocational Rehab (Chapter 31)

The Financial Aid Department will process eligible Service Members using VA education benefits through Enrollment Manager provided by the Veterans Affairs Department. Enrollment certification will be done prior to the beginning of each semester. Any changes in schedule that occur mid-semester will be reported to the VA, and as such, a financial adjustment may occur when and if necessary.

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All Chapters must fill out an application available online at <a href="www.gibill.va.gov">www.gibill.va.gov</a>. To ensure correct processing please provide a copy of your DD-214 and Certificate of Eligibility to the Financial Aid Department. Western State College of Law does not determine benefit eligibility or payment details; we simply certify your enrollment to the VA. All processing questions should be directed to the VA for resolution.

# Veterans Education Benefits Summary Post 9/11 GI Bill – Chapter 33

This program is for student-veterans who have served at least 90 aggregate days on active duty beginning on or after Sept. 11, 2001, or who were honorably discharged from active duty due to a service-related disability after serving 30 continuous days beginning on or after Sept. 11, 2001. Active duty time will determine tuition percentage benefit eligibility that expires 15 years after separation. Additional benefits include tuition and fee payment to school of choice and a book stipend of up to \$1,000 per year. *VA pays school directly*.

#### Montgomery GI Bill (MGIB) - Chapter 30

Under Chapter 30, active-duty members enroll and pay \$100 per month for 12 months. They are then entitled to receive a monthly education benefit once they have completed a minimum service obligation. Eligible veterans have 10 years after leaving the military to use this benefit. <u>Student pays tuition.</u>

#### Montgomery GI Bill for Reservists (MGIB-SR) - Chapter 1606

A reservist soldier must be actively training and have a six-year obligation in the reserve unit to be eligible for this program. This benefit is based on the student's enrolled credit status, meaning full time, part time, or less have prorated amounts paid out to the soldier's direct deposit. Student pays tuition.

#### Reserve Educational Assistance Program (REAP) – Chapter 1607

For a reservist activated for more than 90 days after Sept. 11, 2001, the monthly benefit will reflect the length of title 10 orders. This benefit is based on the student's enrolled credit status, meaning full time, part time, or less have prorated amounts paid out to the soldier's direct deposit. <u>Student pays tuition.</u>

#### Survivors and Dependents Education Assistance (DEA) – Chapter 35

Dependents educational assistance provides education and training opportunities to eligible dependents of certain veterans. Review education benefits information and application on our website: www.tri-c.edu/gi-bill. VA pays school directly.

#### Vocational Rehabilitation - Chapter 31

Veterans with a service-related disability rating of at least 20 percent are eligible. VA pays costs such as tuition and fees, books, supplies and equipment. VA will also pay a monthly benefit to help with living expenses. <u>VA pays school directly.</u>

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#### VA Office and Resources

The VA Regional Processing Office for California is in Muskogee, OK (PO Box 8888, Muskogee, OK 74402-8888.

# Deadlines and Contacting WSCL Financial Aid Office

#### Deadlines

| PRIORITY DEADLINES   | Full Academic Year   | Spring Semester   |
|--|----------------------|---|
| Submission of FAFSA to the federal processor<br>Receipt of all other materials by the College of Law | April 15<br>April 15 | October 31<br>October 31                                |
| NON-PRIORITY DEADLINES   | Full Academic Year   | Spring Semester   |
| Receipt of all materials for non-priority processing   | October 31           | April 15<br>Last date to apply for aid<br>(loans, etc.) |

# Contacting Financial Aid

| Western State College of Law<br>Student Finance Office<br>16715 Von Karman Ave. #100 | Office Direct Telephone (714) 459-1120<br>E-mail <u>wsu406@wsulaw.edu</u><br>Visit our website at <u>https://www.wsulaw.edu/</u> |  |
|--|--|--|
| Irvine, CA 92606   |  |  |
| Office Hours:  |  |  |
| Monday - Thursday, 9:00 a.m. — 6:30 p.m.   |  |  |
| Friday, available by appointment   |  |  |

# COMMONLY USED FEDERAL STUDENT AID TERMS

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#### Academic Year

A period that begins on the first day of classes and ends on the last day of classes or examinations and that is a minimum of 30 weeks (except as provided in 34 CFR 668.3) of instructional time during which, for an undergraduate educational program, a full-time student is expected to complete at least: (a) 24 semester or trimester hours; or (b) 36 quarter hours in an educational program whose length is measured in credit hours; or 900 clock hours in an educational program whose length is measured in clock hours.

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#### Aid Package

A combination of financial aid (scholarships, grants, loans, and/or work-study) assembled by the Financial Aid Department of a college or university for an eligible recipient. This also includes institutional aid.

#### Allowable Charges

Educational expenses that a student incurs for which a school may credit a student's account with FSA funds. These charges may be credited to a student's school account and paid using FSA funds. These charges may include current charges for tuition and fees and room and board (if the student contracts with the school for these services). Other current charges that a student incurs for educationally related activities may be considered allowable charges if the school obtains the students authorization (or parent's authorization for PLUS Loan funds) to have such charges paid with FSA funds. Allowable charges may also include certain minor charges for the previous award year. See *Current Charges*.

#### Aid Offer

As a noun, a specific amount of financial assistance to pay for education costs offered to a student through one or more financial aid programs. As a verb, approving financial assistance to students. A participating school makes a determination of the amounts and types of assistance it has available to offer to the student along with any other types of assistance the student may have received or will receive. Under 34 CFR 668.16(h), the school is required to provide information about the source and amount of each type of aid offered.

#### Offer

An official document issued by a Financial Aid Department listing the types and amounts of all the financial aid offered to the student. Generally, the offer includes information about the cost of attendance and terms and conditions for the financial aid.

#### **Award Year**

The time period from July 1st of one year through June 30th of the following year, for which financial aid awards are made. The award year differs from the federal fiscal year (October 1 through September 30). FFELP and Direct Loan funds are not tied to an award year.

#### Cancellation

Releasing a borrower from the obligation to repay all or a portion of his or her loan.

#### Capitalizing Interest

A process in which interest that has accrued but has not been paid is added to the loan principal. By increases the amount of the principal capitalization increases the total amount that must be repaid over time.

#### Cohort Default Rate

A measurement of the percentage of a school's borrowers who enter repayment in a federal fiscal year and default on their loans before the end of the next federal fiscal year.

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#### Common Origination and Disbursement (COD)

The system for processing origination and disbursement reporting. The COD System accommodates the COD Process for Pell Grant and Direct Loan funding.

#### Cost of Attendance (COA)

The Cost of Attendance consists of the sum of educational costs payable to the school (also referred to as direct or billable costs) and costs paid to others (or indirect, non-billable or discretionary) costs. The Cost of Attendance represents the highest dollar amount of financial aid a student can receive during an award year.

#### Costs Paid to Others

Costs paid to others (also referred to as indirect, non-billable, or additional costs), are other expenses not paid directly to the school, but associated with receiving an education. These expenses are estimated by the school and may differ from student to student based on their individual circumstances. These expenses may include books, course materials, supplies, equipment, transportation and parking, personal expenses, childcare costs, computer costs, disability expenses, licensure expenses and off-campus rent and food

#### Costs Paid to the School

Costs Payable to the school (also referred to as direct or billable costs) generally include tuition, fees, housing, and meals/food (for students residing on campus), health insurance (if minimum insurance coverage is not documented), or any other expenses paid to the school for enrollment.

#### Credit Balance (Title IV)

Refers to those Title IV funds that exceed the student's allowable charges. A school must pay this balance directly to the student (or parent, if PLUS Loan funds create the credit balance) as soon as possible, but no later than 14 days after the credit balance occurs (or no later than 14 days after the first day of classes of the payment period if the credit balance occurs on or before the first day of class).

#### Default

Failure to repay a student loan according to the agreed-upon terms of a promissory note. Default occurs at 180 days when the delinquency date is prior to 10/7/98, and 270 days when the delinquency date is on or after 10/7/98. The school, lender, and state and federal governments may take legal action against the borrower to recover defaulted loan funds.

#### Deferment

A period during which a borrower, who meets certain criteria, may suspend loan payments. For some types of loans, the federal government pays the interest during a deferment. On others, the interest accrues and is capitalized and the borrower is responsible for paying it.

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#### **Delinquency**

Failure to make monthly loan payments when due. Delinquency begins with the first missed payment.

#### Drawdown

A drawdown occurs when a school or COD, on behalf of a school, initiates a request for money through GAPS, and the funds are transmitted from the U.S. Treasury to the school's bank account.

#### **Educational Loan**

Money borrowed from the federal government, a college or university, or a private source like a bank or financial institution to pay for educational expenses and must be paid back with interest.

#### Electronic Master Promissory Note (eMPN)

A Web based Master Promissory Note. A student can complete and sign an MPN electronically instead of using a paper MPN. Users must have a PIN to initiate the process. Also see *Master Promissory Note*.

#### Eligible Borrower

A borrower or potential borrower who meets federal eligibility criteria for a Federal Stafford loan or, a Federal PLUS loan.

#### **Enrollment Status**

An indication of a student's current status at the postsecondary institution. Status types include full-time, half-time, less than half-time, leave of absence, graduated, withdrawn, deceased, never attended, or no record found.

#### **Entrance Counseling**

First-year, first-time students borrowing federal educational loans are required to receive counseling before they receive their first loan disbursement, during which the borrower's rights and responsibilities and loan terms and conditions are reviewed.

#### Estimated Financial Assistance (EFA)

The school's estimate of the amount of financial assistance that a student has been or will be awarded for the enrollment period for which a loan is sought. The EFA includes assistance from federal, state, institutional, scholarship, grant, financial need-based employment, or other sources.

#### Exit Counseling (for a student borrower)

Institutions participating in the Federal Perkins Loan, FFELP, and Direct Loan Programs (excluding FFELP PLUS Loans and Direct PLUS Loans) must offer loan counseling called *exit counseling* to borrowers. For Federal Perkins Loan borrowers, the interview must take place before the borrower leaves school. In the case of FFELP and Direct Loan student borrowers, the interview must take place shortly before the borrower ceases to be enrolled at least half time.

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#### Federal Loan

Also known as the Direct Loan Program, which allows eligible students and parents to borrow directly from the U.S. Department of Education at participating colleges or universities. Federal student loans include Direct Subsidized, Direct Unsubsidized and the Direct PLUS programs for parents of dependent students and graduate or professional students.

#### Federal Direct Subsidized Loan

A Direct Subsidized Loan is an <u>undergraduate</u> federal student loan based on financial need and offers students a reduced, fixed interest rate and flexible repayment terms. Interest is subsidized, meaning it does not accrue to the borrower, while in an in-school, grace, or deferment period. Annual and aggregate limits apply.

#### Federal Direct Unsubsidized Loan

An unsubsidized loan offers students a fixed interest rate and flexible repayment terms. It is not based on financial need. Interest begins to accrue when the loan is disbursed and can be paid while the student is enrolled or when loan repayment begins. Annual and aggregate limits apply.

#### Federal Direct Graduate PLUS Loan

Direct Graduate PLUS Loans are federal loans that graduate or professional students use to help pay for education expenses. A credit check for adverse credit history is required for eligibility. Interest begins to accrue when the loan is disbursed and can be paid while the student is enrolled or when loan repayment begins.

#### Federal Direct Graduate PLUS Loan

Direct Parent PLUS Loans are federal loans that parents of dependent undergraduate students can use to help pay for education expenses. Parents must pass a credit check for adverse credit history to qualify for PLUS loans.

#### Financial Aid Package

The total amount of financial aid (federal and nonfederal) such as scholarships, grants, loans, and/or work-study awarded to a student.

#### **Grace Period**

Specified period of time between the date a student graduates or drops below half-time status and the date loan repayment begins.

#### *Independent Student*

An applicant for FSA program assistance who meets certain criteria. To be classified as an independent student for FSA purposes: be a graduate or professional student.

#### *Ineligible Borrower*

A borrower or potential borrower who does not meet federal eligibility criteria for an FSA student PLUS loan.

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#### Institutional Student Information Record (ISIR)

An electronic output document generated by the FPS that summarizes information provided on a student's FAFSA. Also provides the result of the SAI calculation, results of eligibility matches with certain databases, reject reasons, comments, and data assumptions. It is available to schools through the Electronic Data Exchange (EDE).

#### Interest

A fee charged to the borrower for use of a lender's money.

#### Leave of Absence

A break in enrollment, not including semester or spring break(s), requested by the student and sanctioned by the school. A student on an approved leave of absence is not a withdrawal.

#### Loan Period

The period of enrollment for which a loan application is certified. Also known as period of enrollment.

#### Office of Postsecondary Education (OPE)

OPE directs, coordinates, and recommends policies for programs that are designed to provide financial assistance to eligible students; improve postsecondary educational facilities and programs; recruit and prepare disadvantaged students for postsecondary programs; and promote the domestic study of foreign languages and international affairs, research, and exchange activities.

#### Office of Postsecondary Education Identifier (OPE ID)

An eight-digit identification number assigned by ED's Office of Postsecondary Education to an institution that has been approved to participate in the FSA programs. Schools that don't administer FSA funds but want their students to qualify for in school deferments also are assigned an OPE ID number.

#### **Overpayment**

Any financial aid amount paid to a student in excess of the amount the student is eligible to receive.

#### **Payment Period**

A school-defined length of time for which financial aid funds are paid to a student. For programs using academic terms (semester, trimester, or quarter), a payment period is equal to a term. For programs not using academic terms, schools must designate at least two payment periods within an academic year that meets all applicable regulations.

#### Potential Overaward (POP)

Federal Pell Grant recipients are allowed to receive a maximum of one full Scheduled Pell Grant during an award year. The COD System is programmed to calculate the percentage of Scheduled Pell Grant used each time a school reports a disbursement to the student. Any amount exceeding 100% of a full Scheduled Pell Grant represents an over award situation. The

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COD System allows a potential over award situation to exist for 30 days and sends a warning to all schools involved before reducing all of the students Pell Grant disbursements for that award year to zero.

#### Principal Balance

The outstanding amount of a loan on which the lender charges interest. As the loan is repaid, a portion of each payment is used to satisfy interest that has accrued and the remainder of the payment is applied to the outstanding principal balance.

#### Private Loan

A student or parent loan from a bank, credit union, private company, a nonprofit or state-affiliated lender, or from the college or university directly to pay for educational costs. Interest begins to accrue when the loan is disbursed, and repayment begins while the student is still enrolled in school.

#### Professional Judgment (PJ)

A provision in the Higher Education Act allowing financial aid administrators to adjust the data elements used to calculate the student's SAI. The exercise of professional judgment may increase a student's eligibility for financial aid. Professional judgment can be used only on a case-by-case basis, and the reason must be documented in the student's file.

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

When a recipient of Title IV aid withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, the institution must calculate the amount of Title IV aid the recipient earned and return the unearned portion that it is responsible for and notify the student of any amount the student must return.

#### Satisfactory Academic Progress (SAP)

The qualitative (grade point average) and quantitative (time limit) measure of a student's progress toward completing a program of study. To maintain eligibility for FSA program assistance, the student must show continued progress. Schools must establish policies regarding satisfactory academic progress and must check the progress of FSA recipients at least once each academic year.

#### FAFSA Submission Summary (FSS)

The output document that the FPS sends to a student after a FAFSA is processed. It summarizes the information the student submitted on the FAFSA; reports the student's calculated SAI; provides comments to the student as well as information for the financial aid administrator; and reports the student's NSLDS financial aid history. Also see *Output Document and Institutional Student Information Record* (ISIR).

#### Student Right-to-Know Act

The Student Right-to-Know Act requires disclosure of information on Graduation, Completion, and Transfer-Out Rates; and the Graduation, Completion, and Transfer-Out Rates for Student Athletes at schools that award athletically related aid.

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#### **Tuition**

The amount of money charged for instruction and use of educational facilities such as libraries.

#### U.S. Department of Education (ED, the Department)

The Federal department that administers the Title IV programs.

#### Verification

The process a school follows to check the accuracy of the information reported by the student on the FAFSA. The information reported is compared against documents, such as signed federal tax forms and signed Verification Worksheets, the student provides to the school.

#### Withdrawal Date

The date the student withdraws, as determined by the school.

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