# WAYNESVILLE CAREER CENTER

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Financial Aid Policy & Procedures Manual

400 GW Lane Street Waynesville, MO 65583





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As with any document of policies and procedures, this guide is continually reviewed and updated to meet the requirements of the United States Department of Education and the needs of our students. For more information on policy updates, contact the Financial Aid Administrator. All changes to this manual must be approved by the Waynesville R-VI School District Board of Education, the Director of Career/Adult Education, the Assistant Director of Career/Adult Education and the Financial Aid Administrator.

## **Section 1 Introduction**

#### Introduction to the Financial Aid Office

The purpose of the Waynesville Career Center's (WCC) Financial Aid Office is to assist post-secondary students obtain any and all Federal and State Aid they may be eligible to receive. By doing so, we assist our students in obtaining the quality post-secondary education they deserve.

The financial aid office is located at: 400 GW Lane Street Waynesville, MO 65583 573-842-2500

#### Purpose and Philosophy

Waynesville Career Center believes that everyone who desires training should have the opportunity of attending school regardless of their financial situation. We continue to promote financial assistance opportunities to eligible students who might otherwise be depriving themselves of the benefit of training. The primary purpose of the financial aid program at WCC is to provide financial assistance to students who, without aid, would be unable to attend school. Financial assistance is offered in the form of grants, scholarships, and federally funded programs. Financial assistance is viewed only as supplementary. The student and the family of a student, when applicable, are expected to make a maximum effort to assist with accordance with federal regulations and guidelines pertaining to the type of assistance requested.

#### Policies & Procedures Development Responsibilities

The responsibility of financial aid policy decisions are made by the Director of Career/Adult Education, the Assistant Director of Career/Adult Education and the Financial Aid Administrator. The policy parameters are within the federal, state, and institutional regulations.

#### **Documents & Methods**

Students applying for aid must complete the Free Application for Federal Student Aid (FAFSA). This is available, free of charge, at <a href="www.fafsa.ed.gov">www.fafsa.ed.gov</a>. Another way to apply is through the FAFSA feature of MyStudentAid app for mobile devices by visiting the App Store (IOS) or on Google Play (Android). After this process has been completed, the U.S. Department of Education will notify the student by sending a Student Aid Report (SAR). The SAR is used to verify that the information submitted is correct. If any corrections need to be made, students may contact the Financial Aid Office or make corrections, using his/her assigned FSA ID number at <a href="www.fafsa.ed.gov">www.fafsa.ed.gov</a>. Student information will automatically be sent to WCC through GEMCOR's software program, TEAM, if the student has listed WCC as their school of choice using **Federal School Code 014833**. WCC will receive an ISIR (the electronic equivalent to the SAR) from the USDE so the institution can determine the students eligibility for financial aid.

Once the student has completed the FAFSA, they will need to complete the Direct Loan Entrance Counseling and a Master Promissory Note online at <a href="https://studentloans.gov">https://studentloans.gov</a>

A student must complete an application for the program they are enrolling in and include all required documents with the application to be considered for the program of interest. Once WCC receives the

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completed application, the student is required to complete an entrance test and interview.

Once the student receives their WCC Acceptance Letter and has accepted their position in the program they applied, a student will be considered actively enrolled. The student will contact the financial aid office within 2 weeks of the date on their acceptance letter to set an appointment with the financial aid office. The Financial Aid Administrator will go over the amount the student is eligible for in Federal Aid, State Aid, and other ways to pay for the upcoming academic year.

#### **Section 2**

#### Administrative Organization & Office Management

#### Institutional & Division Structure

Waynesville Career Center is hosted by the Waynesville R-VI School District. The Waynesville Board of Education is the policy-making body responsible for WCC.

#### Financial Aid Office Responsibilities

The Financial Aid Administrator, under the general direction of the WCC Director, the Assistant Director, and in cooperation with the District Accounting Specialist in Operational Services provides leadership and direction for the delivery and coordination of federal, state and institutional student financial aid programs, audits, compliance reviews and account reconciliation reviews. The Financial Aid Administrator is responsible for the management and administration of the student Financial Aid office, it functions.

#### **Section 3**

#### **General Aid Office Administration**

#### Accommodations for Disabilities

Waynesville Career Center does not discriminate on the basis of disability in admission to its programs, services, or activities, in access to them, in treatment of individuals with disabilities, or any aspect of their operations. Waynesville R-VI School District also does not discriminate on the basis of disability in its hiring or employment practices.

This notice is provided as required by Title II of the Americans with Disabilities Act of 1990 and Section 504 of the Rehabilitation Act of 1973. Questions, complaints or requests for additional information regarding the ADA and Section 504 may be forwarded to the designated ADA and Section 504 compliance coordinator.

Office of Personnel Services 200 Fleetwood Waynesville, MO 65583 573-842-2094

#### Appointments with Staff

The Financial Aid Office is open from 7:00 a.m. -3:30 p.m. Monday through Friday, except holidays. Appointments at other times may be scheduled in advance by calling 573-842-2513. For prompt attention appointments are recommended.

#### **Section 4**

#### Financial Aid Program Eligibility & Administrative Capabilities

#### Institutional Eligibility Requirements

WCC is an eligible, public post-secondary vocational institution. WCC is legally authorized by the State of Missouri to provide post-secondary education programs. WCC is accredited by the Council on Occupational Education (COE). The school admits as regular students only individuals with a high school diploma or its recognized equivalent.

#### Program Eligibility

WCC's academic year definition is at least 26 weeks and/or 900 clock hours of instructional time.

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Programs more than the academic year as defined, vary by program. The award year begins July 1 of one year and ends June 30 of the following year.

WCC has ensured that all offered programs are eligible for FSA funds for eligible students enrolled in that program by obtaining authorization from the State of Missouri and COE. WCC has also obtained approval through the U.S. Department of Education to administer FSA Programs for our eligible non-degree programs by listing these programs on the Eligibility and Certification Approval Report (ECAR).

#### Administrative Capability

The Waynesville R-VI School Board of Education governs the operation of WCC. The Superintendent of Schools is responsible for the overall function of the institution while the day-to-day operations are coordinated by the Director of WCC. The district Accounting Specialist and the Financial Aid Administrator are the primary administrators in dealing with the Financial Aid Office.

#### **Section 5**

#### **Records Management & Retention**

Waynesville Career Center retains all required records for a minimum of three years from the end of the award year.

- Pell Grants: 3 years from the end of the award year for which the aid was awarded.
- Direct Loans: 3 years from the end of the award year for which the aid was awarded.
- Direct Loan Borrower: 3 years from the end of the year in which the student last attended.

Waynesville Career Center follows the Missouri Secretary of State Local Government Records Retention Schedules for State of Missouri Scholarship & Grants. WCC has established and maintains, on a current basis, any application submitted for FSA program funds.

Other program records that are maintained include:

- Program Participation Agreement, Approval Letter, and Eligibility and Certification Approval Report (ECAR)
- Accrediting and licensing agency reviews, approvals, and reports
- State agency reports
- Audit and program review reports
  - Other records, as specified in regulation, that pertain to factors of financial responsibility and standards of administrative capability.
- WCC also keeps records that substantiate the eligibility of students for FSA funds, such as:
  - Cost of attendance information
  - o 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, needs analysis documents, enrollment status, and period of enrollment
  - o Required student certification statements and supporting documentation
  - o Documents used to verify applicant data, and resolve conflicting information
  - o Documentation of all professional judgement decisions
  - o Financial aid history information for all students-Student Ledger Sheets

#### **Section 6**

#### Information Sharing & the Family Education Rights and Privacy Act

Waynesville Career Center complies with the Family Educational Rights and Privacy Act (FERPA) of 1974. In accordance with this federal law, WCC has adopted policies and procedures governing the confidentiality of student educational records. No individual shall have access to, nor will the institution disclose any information from, a student's educational record without the written consent of the student or otherwise authorized by FERPA.

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Permitted exceptions under the law include disclosures to: school officials and personnel who have a legitimate educational interest, officials of other institutions in which a student seeks enrollment, representatives of agencies or organizations from which a student has received financial assistance and certain federal and state officials.

WCC does not provide a student directory of adult students, therefore personal student information will not be disclosed.

#### **Section 7**

#### **Complaint Resolution Process**

Individuals with a complaint concerning the Waynesville Career Center are asked to submit the complaint in writing to the Assistant Director if resolution cannot be achieved with the staff member most directly involved. Face-to-face discussion of the matter or other informal means is the preferred starting point. If resolution is not achieved individuals should follow the listed institutional chain of command (WCC Assistant Director, WCC Director, and Waynesville R-VI School District Superintendent or designee). Once all institutional processes are exhausted, complainants should follow the CBHE (Coordinating Board of Higher Education) Policy on Complaint Resolution found below.

#### CBHE POLICY ON COMPLAINT RESOLUTION

#### **Introduction:**

In order for institutions of higher education to participate in the federal student aid programs authorized by Title IV of the Higher Education Act of 1965, an institution must be legally authorized to provide post-secondary educational programs within the state in which it is located. By rule promulgated by the U.S. Department of Education, part of this "state authorization" requirement is that the state must have "a process to review and appropriately act on complaints concerning the institution including enforcing applicable State laws ...." 34 C.F.R. § 600.9(a)(1). For its part, the institution must "provide students or prospective students with contact information for filing complaints with its accreditor and with its State approval or licensing entity and any other relevant State official or agency that would appropriately handle the student's complaint." Id. at § 668.43(b).

The Coordinating Board has determined that from the perspective of the institutions and of students and prospective students, it is preferable to have a simplified process with a central clearinghouse for addressing complaints rather than a complex matrix of contact points that might not cover every possible complaint and might also easily become outdated. Therefore, this policy sets out a process by which the Missouri Department of Higher Education will serve as the clearinghouse for complaints concerning colleges and universities authorized to operate in the State of Missouri, acting on those within its purview and forwarding those that are not to other entities for their appropriate action.

#### **Complaints Not Covered**

Complaints concerning laws not applicable to a state institution of higher education are not covered by this policy. Complaints of criminal misconduct should be filed directly with local law enforcement authorities. Complaints relating to violations of Federal law should be filed directly with the Federal agency having cognizance over the matter in question (e.g., violations of the Family Educational Rights and Privacy Act with the U.S. Department of Education).

#### **Exhaustion of Remedies at the Institutional Level**

Many issues fall within areas that generally are within the sole purview of an institution and its governing board. Examples include, but may not be limited to, complaints related to student life (such as, student housing, dining facilities, or student activities and organizations) and certain academic affairs (such as the assignment of grades). Moreover, issues or complaints are generally more speedily and appropriately resolved within the grievance channels available at the institution. Face-to-face discussion of the matter through open door policies or other informal means is the preferred starting point. Should

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that fail, the complainant should use formal dispute resolution mechanisms provided by the institution. Exhaustion of all informal and formal institutional processes, including both campus processes and any applicable system processes, is a prerequisite to filing any formal complaint with the MDHEWD pursuant to this policy.

#### **Process**

If a mutually agreeable resolution cannot be reached at the institutional level, the student or prospective student may proceed with the MDHEWD's formal complaint process. The complaint must be submitted in writing, using a complaint form provided by the MDHEWD. It may be mailed or faxed to the department and should include any other supporting documentation. The MDHEWD will acknowledge receipt of the complaint, either in writing or by email. Such acknowledgment, however, will not constitute a determination that the complaint addresses a law applicable to the institution or otherwise is a complaint covered by the policy. If there is no indication that institutional remedies have been exhausted, the complaint will be returned for that purpose.

Filing a complaint pursuant to this policy cannot, and does not, extend or satisfy any statutory deadlines that may apply to filing particular complaints with any other state or federal agency having jurisdiction over such matters.

Complaints that fall within the jurisdiction of the CBHE will be investigated and resolved as appropriate by the relevant unit of the MDHEWD. Complaints that fall within the jurisdiction of another State agency or are within the purview of an institution's accrediting body will be forwarded to that agency for appropriate investigation and resolution. The agency to which the complaint is forwarded will keep the MDHEWD apprised of on-going status and final disposition of the complaint. All parties to the complaint will be notified of its resolution by mail.

The MDHEWD will keep a log of all complaints and record the date received, the name of the complainant, the institution against which the complaint is made, a brief description of the complaint, the agency addressing the complaint, and the date and nature of its disposition.

**Note:** Prior to initiating this formal process, complainants must first call the MDHEWD at 573-5261577 to indicate their desire to file a complaint. At that time, the MDHEWD will ascertain whether the issue can be resolved through informal means and also determine whether administrative processes available within the institution of concern have been exhausted. If after that screening the complainant still desires to initiate a formal complaint, the MDHEWD will send the complainant the form to be filled out and returned for that purpose.

Once all institutional processes are exhausted, complainants may also be forward to the institutional accrediting agency, Commission on Occupational Education. Mail to: 7840 Roswell Road, Building 300, Suite 325, Atlanta, GA 30350. Or by calling: 800-917-2081

#### **Section 8**

#### **Electronic Processes**

Waynesville Career Center contracts with GEMCOR, Inc. for the processing of student financial aid. GEMCOR and WCC transmit confidential student information via the TEAM Software System on the Web and Citrix® ShareFile. Safeguards against possible fraud and abuse include:

- password protection
- password changes at set intervals
- access revocation for unsuccessful log-ins
- WCC Financial Aid office along with GEMCOR personnel uses:
  - the E-App to submit and update the school's eligibility information through <a href="https://eligcert.ed.gov">https://eligcert.ed.gov</a>
  - o the Student Aid Gateway (SAIG) system at <a href="https://fsawebenroll.ed.gov">https://fsawebenroll.ed.gov</a> to verify users and access to information

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- o the COD website <a href="https://cod.ed.gov">https://cod.ed.gov</a> to confirm completion of entrance counseling and signing of MPN
- o the Information for Financial Aid Professionals (IFAP) web site to review Dear Colleague Letters, announcements, or Federal Registers at <a href="https://ifap.ed.gov">https://ifap.ed.gov</a>

#### Section 9 Financial Aid Programs

#### Information Discrepancies

WCC will not disburse aid until any conflicting information has been resolved. All resolutions of conflicting information will be documented in the student's file explaining the resolution, in detail, and accompanied by any supporting documentation. If a student withdraws and has conflicting information in their file, resolution will be made by the financial aid staff before making late or post-withdrawal disbursements

Conflicting information consists of, but is not limited to:

- Student name an SSN do not match
- Conflicting enrollment information
- Student's financial aid history, as reported by NSLDS
- Any output document received from USDE with a "C" flab by the EFC
- Student's immigration status
- Changes to an ISIR, once enrollment has commenced, when changes are not made by the Financial Aid Office

All Subsequent ISIR transactions for a student, for the entire processing year, will be reviewed for accuracy and verified again if items required for verification have been changed. Findings will be documented in the student's file explaining the resolution, in detail, and accompanied by any supporting documentation, if applicable.

#### **Cohort Default Rates**

The Department releases draft default rates in February which allows WCC an opportunity to review and correct the data that will be used to calculate their official cohort default rates. In the early fall of each year, the Department issues the official cohort default rates.

The cohort default rate for Federal Stafford or for Direct Subsidized/Unsubsidized Loans made to students for attendance at WCC must remain below 30% for the three most recent fiscal years, or lower, if possible.

#### Reporting & Reconciliation

#### Daily Reconciliations

Daily student disbursements records and disbursement adjustments resulting from refunds are reported to COD each day. This daily process ensures the quickest possible reporting of federal fund activity to the UDSE. Each day GEMCOR reviews the results received electronically from COD for the prior day's submission of student records. This process requires a GEMCOR official to match the number of records submitted to COD in that batch with the number of response records received from COD relative to that records batch. Any discrepancies in record totals are immediate resolved. Subsequent to reconciliation of daily record counts, each disbursement or disbursement adjustment record is reviewed to ensure acceptance and approval of that record by COD. Any rejects or warning notifications are immediately resolved and resubmitted to COD if necessary. These daily reconciliation functions ensure that award activity is reconciled between institutions records and COD's records on a daily basis.

#### Monthly Reconciliation

Multiple reconciliations of federal transactions are performed on a monthly basis by GEMCOR on behalf of Waynesville Career Center.

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GEMCOR's accounting department reconciles all transactions involving funds between the FSA general ledger and the bank statement on a monthly basis. FDSL account statements are received by GEMCOR each month reflecting loan cash and disbursement activity for WCC. These reports are reconciled against GEMCOR's internal records to ensure loan activity is properly reconciled and that all transactions in GEMCOR's system balance with those at the federal level.

On a monthly basis WCC reconciles FSA disbursements to student ledgers. WCC will compare GEMCOR's Award Journals, bank statements and FSA Transactions Report with the student ledgers on a monthly basis to reconcile accounts.

#### Ad Hoc Reconciliation

Waynesville Career Center administers daily activity on-campus and student withdrawal information is provided to GEMCOR. Upon receipt of withdrawal information from the institution, GEMCOR performs the following adjustments to the student's record:

- Reduction of disbursement amounts to reflect any refund activity, if applicable.
- Review the loan origination record to determine the need for any loan period modification.
- Reduce any unpaid subsequent disbursement records to \$0.
- Adjust loan period ending dates, if applicable.
- Report common record changes to COD, if applicable.

The above functions ensure that all student origination records are accurate and compliant with 150% subsidized loan usage limitation regulations and requirements.

#### Annual Reconciliations/Close Outs

GEMCOR reconciles all disbursement activity for the award year on behalf of Waynesville Career Center. Upon the conclusion of the award year and subsequent to the end of all loan periods for award originated during that award year, GEMCOR will confer with WCC to balance all unpaid expected disbursement records that remain active. Any existing unpaid disbursements are reduced to \$0 and loan period end dates are adjusted if applicable. This ensures that there are no remaining disbursement records in COD for the recently completed award year. After reconciling any disbursement records as mentioned above, and after confirming a zero cash balance, GEMCOR will officially process a close out of the award year with COD.

#### Student Eligibility Title IV Requirements

To receive FSA funds, a student must be qualified to study at the post-secondary level. A student qualifies if he/she:

- has a high school diploma (this can be from a foreign school if it is equivalent to a U.S. high school diploma)
- has the recognized equivalent of a high school diploma, such as a general education development or GED certificate
- has completed homeschooling at the secondary level
- A student may self-certify on the FAFSA that he has received a high school diploma or GED or that he has completed secondary school through homeschooling as defined by state law.
- A student must be a citizen or eligible noncitizen to receive aid from the FSA programs.

The eligible statuses are:

- o A U.S. citizen or national;
- o A U.S. permanent resident;
- Citizens of the Freely Associated States: the Federal State of Micronesia and the Republics of Palau and the Marshall Islands;

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#### Other eligible noncitizens

A person isn't eligible for FSA funds if he is in default on an FSA loan or he owes an overpayment on an FSA grant or loan and he has not made a repayment arrangement for the default or overpayment. The WCC financial office will check the student's FSA history on NSLDS to verify eligibility.

To be eligible to receive FSA funds, each student mush provide a correct Social Security number (SSN). To confirm the student's SSN, the Department conducts a match with the Social Security Administration.

WCC does not consider incarcerated student for enrollment in any program of study.

#### Federal Aid Programs WCC Participates

#### Pell Grant

Federal Student Aid may be available for any course, which includes, at least 600 clock hours of instruction. Student must have completed their Free Application for Federal Student Aid (FAFSA). Pell Grant awards are based on the Expected Family Contribution (EFC) on the student's SAR or ISIR, WCC's academic year definition and the student's cost of attendance. The scheduled award amounts are specified on the Pell Payment Schedules released by the Department. A student must be enrolled in an approved course of study to receive a Pell Grant.

#### Direct Loan Program (DL)

Students must have completed their Federal Application for Federal Student Aid (FAFSA). To be eligible for Direct Loans, undergraduate students attending a school that participates in the Pell Grant Program must first receive a determination of their eligibility for Pell Grants. Any student that wishes to borrow a subsidized or unsubsidized Direct Loan must be enrolled at least half-time. The Department of Education's definition of a full-time student is anyone attending a minimum of 24 hours per week in a clock hour program. A student enrolled less-than-half-time in not eligible for a Direct Loan.

When WCC receives program funds, it must disburse the funds within 3 business days. Students will be advised in writing of how the loan funds have been applied to their account within 30 days (Student Ledger). They are always informed of their right to cancel loan funds at this time.

Students must complete entrance counseling, sign an electronic Master Promissory Note and complete an Annual Student Loan Acknowledgement prior to being approved for a Direct Loan on the website <a href="http://studentloans.gov">http://studentloans.gov</a>.

The Financial Aid Office regularly requests exit counseling completion reports from the COD website. A copy is placed in the student's file. When it is found that a student has not completed required exit counseling, the Financial Aid Office will notify the student in writing of the requirement to do so and will include the information necessary to complete the counseling.

#### State Aid programs WCC Participates

#### Access Missouri State Grant Program

WCC participates in this program which is administered by the Missouri Department of Higher Education and Workforce Development (MDHEWD) who determines the award amount. Communication concerning the awards is conducted through MDHEWD's FAMOUS software/website. This is a need-based program.

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#### A+ Scholarship Program

The Missouri Legislature enacted the Missouri Higher Education A+ Financial Incentive Grant Act authorizing and directing the Missouri State Board for Higher Education to implement a program of Missouri A+ Financial Incentive Grants. The purpose of these grants is to assist Missouri students seeking post-secondary education free tuition and fees. Assuming that state funds are available, graduates may be eligible to receive up to two year of free tuition and general fees to attend a Missouri public community college or vocational-technical school if they meet specific requirements. Students A+ Incentive Grants are known as Missouri A+ Tuition Grants. Student must provide a copy of their high school transcript with an A+ Seal on it. The Financial Aid Office then bills MDHEWD for any tuition or fee amount not covered by the Federal Pell Grant Program for the current period. The MDHEWD has a tuition reimbursement cap that is used to calculate the A+ amount. The formula is the program's clock hours multiplied by the amount of the cap set by the MDHEWD. For the 2021-2022 school year, the cap was set at \$5.00 per clock hour. WCC uses the A+ Scholarship Worksheet to determine the amount of the scholarship.

#### Fast Track WorkForce Incentive Grant

The Fast Track Workforce Incentive Grant is a new financial aid program for adults through the MDHEWD. The grant addresses workforce needs by helping adults pursue a certificate, degree, or industry recognized credential in an area designated as high need. Grant recipients must maintain Missouri residency and work in Missouri for three years after graduation to prevent the grant from becoming a loan that must be repaid with interest. Students can go to visit the following website for more information: <a href="https://dhewd.mo.gov/initiatives/fasttrackgrant\_for\_students.php">https://dhewd.mo.gov/initiatives/fasttrackgrant\_for\_students.php</a>

#### Workforce Innovation & Opportunity Act (WIOA)

This funding is available through the Missouri Career Center and the Workforce Investment Board.

#### Tuition Assistance (TA)

The Tuition Assistance (TA) program provides financial assistance for education programs in support of a Soldier's professional and personal self-development goals. The courses must be offered by schools that are registered in ArmyIgniteEd and are accredited by accrediting agencies that are recognized by the U.S. Department of Education.

#### Vocational Rehabilitation

Individuals with disabilities that constitute a handicap to employment may qualify for benefits such as tuition and fees, transportation, room and board, if they qualify and meet necessary financial guidelines. Students may apply for financial assistance through this program. Vocational Rehabilitation will determine eligibility.

#### Veteran's Educational Assistance

If the student is a U.S. Veteran and/or meets the criteria of the Veteran's Administration, he/she may qualify for educational assistance. Contact the Department of Veteran's Affairs or the WCC VA Certifying Official for more information.

#### Other Aid Programs/Outside Scholarships

Funds awarded to the student by any outside funding source shall be considered in the student's financial aid packaging. Furthermore, each agency has specific requirements for funding. Documentation of student aid awards will be placed in the student file.

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#### **Student Consumer Information Requirements**

Consumer information as required in Subpart D of the General Provisions include financial assistance information and information about the school's academic programs and policies, information on graduation and completion rates, and information about the school's security policies and crime statistics report. Drug and alcohol prevention materials are available as well as information for borrowing student regarding FSA loan programs, loan obligation and repayment options. Consumer information must include any refund policy with which the school must comply, the requirements for the treatment of Title IV funds when a student withdraws; and the requirements and procedures for officially withdrawing from the school.

Consumer information is distributed by the schools administration and available on the school's website.

#### Section 11 Application Process

Waynesville Career Center utilizes the U.S. Department of Education's Free Application for Federal Student Aid (FAFSA) to determine a student's eligibility for FSA. This application is available at <a href="https://fafsa.ed.gov">https://fafsa.ed.gov</a>. Students are encouraged to import their financial information via the IRS/DRT (Data Retrieval Tool) if available to them while submitting their FAFSA. Use of this tool ensures the most accurate submission of financial information for ISIR preparation and EFC determination. After submitting the FAFSA, the student receives a Student Aid Report (SAR), which includes a summary of application information and the determination of the Expected Family Contribution (EFC). This EFC is the result of computations involving the financial and non-financial data submitted on the application. The method of computation is applied to all students uniformly. Students should review all the information on the SAR. If any changes are necessary the student should make those corrections as soon as possible. Once corrections are completed, a new SAR will be sent to the student and a new ISIR will be sent. Student's ISIR's received from FAFSA's are reviewed by Waynesville Career Center and any "C" Code or verification requirements are resolved by the institution or GEMCOR prior to award packaging. As evidenced by the restrictions in GEMCOR's TEAM Software System, federal grant or loan awards cannot be packaged until all required verification and "C" Codes conditions are resolved.

#### Student Files

A student's file ultimately includes the student's ISIR and all related documentation. Additionally, the student ledger is a document that records all activity to a student's account. All debits, credits, charges, refunds, payment of credit balances, etc. will be recorded on the student's ledger.

#### **Deadlines**

Student FAFSA must be processed by CPS of the Department of Education by February 1 of current year for State Aid and June 30 of the following year for Federal. WCC requires the FAFSA to be completed before the student's first day of classes.

#### **Documentation Collection & Tracking**

As Institutional Student Information Records (ISIR's) are received by GEMCOR, they are uploaded to the TEAM Software System. As students are accepted, their ISIR's are retrieved from TEAM, student files are created, financial aid appointments are made, award letters given and funds disbursed if student meets all required criteria. Any printed ISIR's that are not matched with a student by the end of the award year will be destroyed.

#### Section 12 File Review

#### Verification

All ISIR's received from USDE with an asterisk (\*) by the EFC must be verified. The Financial Aid Office may also choose a student to be verified even if the Department of Education has not. This will only be practiced when it is obvious to the Financial Aid Office personnel that the information on the ISIR may not be correct. No Title IV aid will be calculated or disbursed until the required

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documentation is provided and verified as correct. Students selected for verification will be notified by letter and must submit the completed worksheet and required documentation to the Financial Aid Office within 14 days.

- 1. WCC need not verify a applicant's FAFSA information if:
  - The applicant dies;
  - The applicant does not receive assistance under title IV, HEA programs for reasons other than failure to verify FAFSA information;
  - The applicant is eligible to receive only unsubsidized student financial assistance; or
  - The applicant who transfers to the institution, had previously completed verification at the institution from which he or she transferred, and applies for assistance on the same FAFSA information used at the previous institution, if the current institution obtains a letter from the previous institution;
    - O Stating that is has verified the applicant's information; and
    - o Providing the transaction number of the applicable valid ISIR.
  - Post Enrollment The student was selected for Verification after ceasing to be enrolled at your school, he or she does not intend to reenroll for the award year, and no further (including late) disbursements will be made.
- 2. Unless the institution has reason to believe that the information reported by a dependent student is incorrect, it need not verify the applicant's parents' FAFSA information if-
  - The parents are residing in a country other than the United States and cannot be contacted by normal means of communication.
  - The parents cannot be located because their contact information is unknown and cannot be obtained by the applicant; or
  - Both of the applicant's parents are mentally incapacitated.
  - Both parents or the custodial parent has died.
- 3. Unless the institution has reason to believe that the information reported by an independent student is incorrect, it need not verify the applicant's spouse's information if-
  - The spouse is deceased;
  - The spouse is mentally incapacitated;
  - The spouse is residing in a country other than the United States and cannot be contacted by normal means of communication; or
  - The spouse cannot be located because his or her contact information is unknown and cannot be obtained by the applicant.

#### Acceptable Documents & Forms

WCC Financial Aid Office uses GEMCOR's Dependent and Independent student verification that are within USDE's guidelines. The documentation you will need for verification varies according to the item to be verified. WCC encourages students and parents to use the IRS Data Retrieval Tool (DRT) to import data from their tax return and not change it. It is the fastest, easiest, and most secure method of meeting verification requirements. Required documentation is considered to be student and/or parent federal tax return transcripts. Tax transcripts submitted for verification do not need to be signed by the tax filer unless we have reason to doubt their authenticity. Whenever the regulations allows a signed copy, a Tax Return may be used in place of a Tax Transcript. If the student and/or parent were not required to file, they may mark the appropriate box on the verification worksheet. If income is reported, but a tax return not filed, the student and/or parent must submit proof of that income such as, but not limited to W-2 forms, 1099 forms, etc.

Students or parents who file an amended return (IRS Form 1040X) cannot use the IRS DRT, and if they amend the return after using the DRAT to fill out the FAFSA, we cannot rely on that data. Instead, the Financial Aid Office will need to use information from these documents to complete verification:

• A signed copy of the 1040X form that was filed

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- An IRS Tax Return Transcript (that will only include information from the original tax return and that does not have to be signed)
- Other IRS Transcript (such as a return transcript for taxpayer or RTFTP) that includes all the income and tax information required to be verified: AGI, income tax paid, education credits, etc.

Victims of identity theft who cannot get a return transcript or use the DRT can submit a Tax Return Data Base View (TRDBV) transcript as well as a statement they have signed and dated indicating that they were victims of tax-related identity theft and that the IRS has been made aware of it.

#### Data Elements to be Verified

WCC Financial Aid Office with the assistance of GEMCOR Staff, will verify the student's household size, the number of family members reported to be in college, student's and/or parent's adjusted gross income and income earned from work, the amount of income tax paid, any untaxed income and/or benefits, high school completion, identity and statement of educational purpose (see information below for each verification group for required information to be verified). The following data elements are required to be verified against the required documentation listed:

#### Verification Tracking Group "V1"

| Verification Tracking Group "V1"  |  |  |  |  |
|---|--|--|--|--|
| ISIR Data Field   | Acceptable Documentation   |  |  |  |
| Tax Filers  | Use of the IRS Data Retrieval Tool as evidenced by a "02" code on the 22-23 ISIR  OR  2020 IRS Form 1040, Line 11  2020 IRS Form 1040, Line 22 minus Line 2 of Schedule 2  2020 IRS Form 1040, (Line 4a + 5a) minus (Line 4b + 5b)  2020 IRS Schedule 1, (Line 15 + Line 19)  2020 IRS Form 1040, Line 2a  2020 IRS Schedule 3, Line 3 |  |  |  |
| ALERT: An IRS Data Retrieval Tool response code of "07" indicates that the taxpayer filed an amended tax return for the |  |  |  |  |
| year being verified. A copy of the amended IRS Form 16  | 940X will be required.   |  |  |  |
| <ul><li>Number of Family Members</li><li>Number in College</li></ul>  | Completed and Signed "V1" Verification Worksheet   |  |  |  |
| Non-Tax Filers  | Completed and Signed "V1" Verification Worksheet   |  |  |  |
| <ul> <li>Income earned from work</li> </ul>   | AND  |  |  |  |
| Number of Family Members  | IRS Verification of non-filing (VNF)   |  |  |  |
| Number in College   | (VNF not required for Dependent students)  |  |  |  |

#### Verification Tracking Group "V4"

| ISIR Data Field                           | Acceptable Documentation                         |
|---|--|
| Verification of Student Identity          |  |
| Certification of Statement of Educational | Completed and Signed "V4" Verification Worksheet |
| Purpose                                   |  |

#### Verification Tracking Group "V5"

| ISIR Data Field   | Acceptable Documentation   |
|---|--|
| Tax Filers      Adjusted Gross Income     U.S. Income Tax Paid     Untaxed Portions of IRA     Distribution and Pensions     IRA Deductions and Payments     Tax Exempt Interest Income     Education Credits | Use of the IRS Data Retrieval Tool as evidenced by a "02" code on the 22-23 ISIR  OR  2020 IRS Form 1040, Line 11  2020 IRS Form 1040, Line 22 minus Line 2 of Schedule 2  2020 IRS Form 1040, (Line 4a + 5a) minus (Line 4b + 5b)  2020 IRS Schedule 1, (Line 15 + Line 19)  2020 IRS Form 1040, Line 2a  2020 IRS Schedule 3, Line 50 Line 3 |

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| Verification of Student Identity     Certification of Statement of Educational  |  |  |  |  |
|---|--|--|--|--|
| Purpose  Number of Family Members  Number in College  | Completed and Signed "V5" Verification Worksheet   |  |  |  |
| ALERT: An IRS Data Retrieval Tool response code of  | "07" indicates that the taxpayer filed an amended tax return for the   |  |  |  |
| year being verified. A copy of the amended IRS Form 1040X will be required.   |  |  |  |  |
| Non-Tax Filers  |  |  |  |  |
| <ul> <li>Verification of Student Identity</li> <li>Certification of Statement of Educational<br/>Purpose</li> <li>Income earned from work</li> <li>Number of Family Members</li> <li>Number in College</li> </ul> | Completed and Signed "V5" Verification Worksheet  AND  IRS Verification of non-filing (VNF)  (VNF not required for Dependent students) |  |  |  |

#### Conflicting & Inaccurate Information

When inaccurate or conflicting information is found during the verification process, it must be resolved. The student is contacted in an attempt to resolve any conflicts. Additional documentation may be required to resolve the conflict. When it is found that errors were made, corrections must be made to the student's FAFSA. These changes could result in a change in the student's EFC which would then affect the amount of the student's award aid package.

Students who have **not** been selected for verification and conflicting/inaccurate information has been determined, the student must correct and submit for processing any errors reported on the original FAFSA form that would change the EFC or the student's eligibility for Title IV Aid.

#### Student Notification of Verification Changes

When changes are made to the student's FAFSA application that effect the student's EFC and award, the student will be notified immediately and a new award letter sent reflecting the award amount that corresponds to the student's new EFC.

#### Database Matches, Reject Codes & "C" Codes Clearances

When the Financial Aid Office receives an ISIR with a C Flag where the EFC should be, the reject codes will be identified. The ISIR and SAR include comment codes and text explaining any questionable results from which the matches and edits described here. The Financial Aid Office must consult with the student and/or parent to get clarification and nay additional documents needed to clear the file. The additional information received is then scanned in the ShareFile for GEMCOR and any updates to the ISIR are completed by the GEMCOR representative. There must be documentation in the file to support all changes made to a student's ISIR. The C codes must be resolved before paying the student aid. The most common reject C flags are for the following:

- The student has defaulted on a student loan and is not eligible for FSA. The Financial Aid Office will notify the student immediately and advise them to cure the default and provide them with the contact information provided in the ISIR.
- The student's name and SSN do not match. It is often easier for the student to complete a new FAFSA when they have entered the wrong SSN. The Financial Aid Office can require proof of name and SSN from the student and proceed with processing. Proof shall be the student's original SS card, birth certificate and marriage licenses or court orders if names have been changed by court order.
- NSLDS Unusual Enrollment History Flag requires a resolution. WCC will review the student's enrollment and financial aid records to determine if, during any of the 2018-19, 2019-20, 2020-21, and 2021-22 award years, the student received a Federal Pell Grant or a Direct Loan at our institution. If so, no additional action is required. If not, using information from the National Student Loan Data System, WCC Financial Aid Office must identify all institutions where the

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student received a Federal Pell Grant or Direct Loan for any of the award years listed above. Financial Aid must determine whether academic credit was earned at each of those institutions during the award year for which the student received a Federal Pell Grant or Direct Loan. Based on those determinations, discussions with the student may be necessary.

All documentation request to clear a C code, must be turned in to the Financial Aid office within 14 days of the request.

#### Review of Subsequent ISIR Transactions – Post-Screening

The Financial Aid Office will review all subsequent ISIR transactions received on student's enrolled in a program of study at WCC. As submitted changes are marked by symbols, this process if fairly simple. Once enrolled, it should not be necessary, they should contact the Financial Aid Office for assistance.

All Corrections to a student's FAFSA application will create a subsequent ISIR. When review is complete, the Financial Aid Office may flag the new transaction for verification if information is changed that will affect the student's EFC.

#### Section 13

#### **Cost of Attendance**

#### Various Student Populations

Figures come from The College Board Annual Report Living Expense Budget. These amounts address average room, board, transportation, personal and miscellaneous expenses. WCC uses these figures as opposed to surveying the student population. From these amounts an annual amount is found for each budget category.

#### How Costs Are Derived & Updated

The program allocations are prorated if the program is less than full time or less than one year in length. Program specific tuition, books, supplies and fees are added. All amounts are then totaled creating the program's cost of attendance. Annual increases are based on the Census Bureau Figures.

#### **Budget Restrictions**

Only allowable costs as defined by Department of Education will be considered in a student's program budget.

#### Section 14

#### **Professional Judgement**

#### PJ Authority & Individual Who May Exercise It

PJ determinations are not taken lightly as doing so alters the student's EFC. Professional Judgement is only to be used in extreme cases and when the student can provide the documentation to show that it is justified. WCC determines the PJ's and then documentation with changes is uploaded to TEAM for GEMCOR to update the student's ISIR. Once the new ISIR is available, the Financial Aid Administrator will notify the student of any changes and is given a copy of the revised award letter.

#### Circumstances Where PJ May be Used & Possible Actions

PJ is most commonly used in cases where the student, their parents or their spouse has had a significant change in income. PJ could also be used in cases where the student cased in a 401K, other retirement plan, or significant investment that was reported on the tax return for the base year, but that income is no longer available to them.

PJ might also be considered if the student their parents or spouse had medical expenses in excess of the allowance in the Department's EFC formula.

#### Request for PJ Consideration

WCC Financial Aid Office will not consider professional judgement determination unless it is requested by the student or their parents. Consideration will not take place until all required documentation is

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received.

#### PJ Documentation

The documentation required for the PJ determination will vary, but could include:

- tax returns.
- letter of unemployment status, including date of termination,
- final pay record from employer with year-to-date income clearly stated,
- benefits letter from the Missouri Division of Employment Security,
- proof that investment or retirement plan funds are no longer available,
- proof of paid medical, unreimbursed medical expenses.

#### Section 15

#### Awarding/Packaging Financial Aid

#### Award Packaging

Significant and detailed system edits and codes in GEMCOR's TEAM Software System provide for the most comprehensive and compliant processes available for accurate Federal Direct Student Loan award eligibility and loan amount determination. The following requirements and limitations are all taken into consideration by the software when determining loan eligibility amounts.

- Academic program length or remaining portion thereof
- Academic year length (scheduled or borrower based)
- Loan period length
- Federal minimum loan period limitations
- Tuition and Fees incurred during the loan period
- Estimated room & board expenses during the loan period
- Estimated personal expenses during the loan period
- Transpiration expenses during the loan period
- Estimated other financial assistance during the loan period
- Expected family contributions for the loan period
- Annual Loan Limits
- Maximum Eligibility Periods (MEP's)
- Subsidized Loan Usage (SLU's)
- Remaining Eligibility Periods (REP's)
- Aggregate outstanding principal balances of existing loans
- Counseling requirements
- Promissory Note execution

#### Loan Entrance Counseling

All student loan borrowers are required to complete entrance counseling prior to the first disbursement of their loan proceeds. Students will be required to complete the entrance counseling requirement online through the USDE's loan counseling material at <a href="https://studentloans.gov">https://studentloans.gov</a>. The online process ensures that up to date information is provided to student regarding loan regulations and the borrower's rights and responsibilities. Additionally, GEMCOR will obtain counseling confirmation from the Common Origination & Disbursement (COD) System and will reflect this data in the TEAM System daily. This allows WCC to immediately confirm that online counseling has been completed prior to disbursement.

#### Annual Student Loan Acknowledgement

The Annual Student Loan Acknowledgement is an online session that allows students and parents to see how much they have borrowed, preview what their monthly payments might be, and explain concepts such as capitalization and the difference between federal and private loans. Any borrowers of Federal Subsidized, Unsubsidized, and PLUS loans will be required to complete the informed borrowing confirmation process once each award year before receiving disbursement of their loan.

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#### Master Promissory Note

Student borrowers must complete an electronic Master Promissory Note (E-MPN) at <a href="https://studentloans.gov">https://studentloans.gov</a>. Although Direct Loan awards can be packaged in GEMCOR's TEAM Software System before an MPN is executed, GEMCOR's internal system limitations and controls prohibit the drawdown of any federal loan funds from G5 for any loans that are not attached a valid promissory note in COD. This restricts any possibility of a condition referred to as "Un-booked Loans". FDSL monthly reconciliation is a process that identifies and reconciles un-booked loans. Accordingly, using GEMCOR's quality assurance program, there is never a condition of reconciliation errors due to un-booked loans.

#### Package Construction

A student's aid package is constructed to utilize non-repayable resources first. All aid a student receives must be reported to the Financial Aid Office to prevent over-awards and/or over-payments. Each time the Financial Aid Office is notified of a new source of funding for the student, a new need-analysis will be completed. The Financial Aid Office will make every effort to avoid over-awards and/or over-payments.

#### Packaging Other Education Resources

#### Vocational Rehabilitation

The Division of Vocational Rehabilitation sends the Financial Aid Office an authorization for any enrolled student they support. Vocational Rehabilitation pays the difference between the cost of the student's program and the amount of the student's Pell award. Vocational Rehabilitation assistance is considered in the student's aid package.

#### Veteran's Educational Benefits

The VA Certifying Official is located in the WCC Main Office. Once a student has completed all necessary forms to determine eligibility for benefits and has turned in their Certificate of Eligibility, the certifying official will complete the VA's enrollment form to begin the student's benefit. If a student withdraws, the certifying official will notify the VA.

#### Displaced Homemaker

A student who meets the criteria of the Displaced Homemaker requirements may receive additional funds from Missouri Department of Elementary & Secondary Education. The WCC Financial Aid Office will determine the student/students that may be eligible and fill out the FV-2 form and submit. The funding is considered in the student's aid packaging.

#### Workforce Innovation & Opportunity Act

A student who meets the criteria of the Central Ozarks Private Industry Council (COPIC)//Workforce Innovation & Opportunity Act (WIOA) may be awarded a training grant to attend our educational institution. Financial Aid provides a copy of the award letter to COPIC for their review to determine if a student is in need of additional funding. Financial Aid submits an Individual Training Account (ITA) form. If the student meets all the requirements for additional assistance Financial Aid will receive a funding document that has been approved by COPIC. The funding is considered in the student's aid packaging.

#### Student Needs Analysis

WCC employs the Federal Need Analysis Methodology in assessing the financial need and eligibility for Title IV Assistance. The Federal Need Analysis Methodology is based on the following philosophy of financial aid:

• To the extent that they are able, parents have the primary responsibility to pay for their

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children's education.

- Parents will, as they are able, contribute funds for their children's education.
- Students, as well as parents, have a responsibility to help pay for their education.
- The family should be accepted in its present financial condition.
- Need is determined for Pell Grants by a formula developed and updated annually by the Federal Government.
- A copy of the student's needs analysis will be included in every student file.

#### Award Package Notification

WCC Financial Aid Office notifies students of their award package by an initial letter. This letter is not sent until it is verified that the student is, in fact, enrolled in a program of study at WCC.

In the event a student's award package should be changed, the student will be notified, in writing, of the amended award and the reasons for the amendment will be stated in the notification. Possible reasons for award revisions would be:

- the student received additional funding (scholarship, grant, etc.) after initial notification sent,
- the student's EFC changed, requiring a new need-analysis,
- student defaulted on student loan awarded at another school,
- the student requested and received a consideration of special circumstances,
- any change in the student's status would be reflected in their EFC or enrollment status

#### Packaging Appeals

Should a student wish to appeal their packaging award notification they may do so by notifying WCC's Financial Aid Administrator, in writing, within 15 days of the date of the award notification.

#### Over-Awards

WCC's Financial Aid Office will strive to prevent over-awards and over-payments of FSA funds.

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

If it is discovered that a student has received an over-payment due to supplying false information, failing to disclose or falsifying information, the Financial Aid Office will adjust the amount of the student's aid package to eliminate the over-award.

If this is not possible, we will promptly attempt to recover the over-payment by notifying the student, in writing, and requesting full payment. The notice will state that if the student fails to repay the over-payment or to make satisfactory arrangements for repayment, he or she will be ineligible for Title IV funds until the over-payment is resolved.

If the student claims that the school made a mistake in determining the over-payment, we will consider any information he or she provides and decide whether the objection is warranted.

If, after notification to the student and consideration of possible objections an over-payment remains, and the student has not repaid or made satisfactory arrangements to repay the over-payment, the student's over-payment will be reported to NSLDS and WCC will refer the over-payment to USDE for collection.

#### Resolving an Overpayment When School is Liable

When the Financial Aid Office discovers a student has been awarded aid which exceeds the student's need, we will make adjustments to the student's aid package to prevent an overaward. If funds have already been disbursed when the over-payment is discovered, and the over-payment is a result of an error by the school, WCC's Financial Aid Office and

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GEMCOR will work together to make downward adjustments to the student's award in COD, and either return the funds through G5 or disburse them to another eligible student.

WCC will then attempt to collect funds we have returned from the student. However, this will not be considered a Title IV debt, because the over-payment was due to an error on the part of the school.

#### Section 16 Disbursements

#### **Disbursement Process**

FSA disbursements are made on a Payment Period (PP) basis. Each payment period is listed below:

| Program                  | Clock Hours | PP1     | PP2        | # of Weeks |
|--------------------------|-------------|---------|------------|------------|
| <b>Practical Nursing</b> | 1425        | 0-712.5 | 712.5-1425 | 23 Weeks   |
| T&I Programs             | 1020        | 0-510   | 510-1020   | 18 Weeks   |
| Cosmetology Instructor   | 630         | 0-315   | 315-630    | 9 Weeks    |
| Cosmetology              | 1220        | 0-610   | 610-1220   | 32 Weeks   |

FSA funds are paid at such times and in such installments within each payment period for each student to successfully complete half the weeks of instructional time and half the clock hours in the program.

#### Loan Disbursements

When a student is eligible for a disbursement of loan proceeds for a payment period, WCC will approve that it wishes to make that disbursement through processes provided for in the TEAM Software System. At this time, an authorized school official will confirm the student's eligibility for this disbursement through a GEMCOR's SAP Evaluation in the TRAX program. This process occurs with each disbursement of each loan award to further ensure program compliance.

WCC's eligibility approval is then processed through GEMCOR's internal computer systems which provide an additional layer of review and confirmation of the expected disbursement and amount. This loan disbursement record is then electronically reported to COD for a third layer of edits and approval. Upon acceptance and approval of the disbursement by COD, and only upon such acceptance, is WCC notified that it may then disburse those funds on behalf of the student borrower for the payment period intended. Although federal regulations require that institutions report disbursements of federal aid up to 15 days after such funds are disbursed, GEMCOR's policies and procedures require that disbursements of federal aid by client institutions be reported to and accepted by COD before funds are ever drawn down from G5. This "records first" process is well known by the USDE and results in the tightest control of federal financial transactions. Requiring that loan disbursements be approved and accepted by the USDE's COD system before being funded further ensures that routine reconciliation of program activity is 100% balanced in real time on a daily basis resulting in the strictest quality assurance for Direct Loan transactions.

The above processes also result in strict cash management compliance regarding drawdowns of federal funds and excess cash restrictions.

#### Definition of Disbursements & Disbursement Methods

Funds are considered 'disbursed' to the student when they are applied to the student's account. When FSA funds are received, the adult and community education secretary will post payments to the student accounts. As means of internal checks and balances, no one person or office shall package, authorize, and disburse FSA funds to students.

#### Disbursement Dates & Schedules

WCC will notify the students of the amount of funds the student can expect to receive from each FSA program, and how and when those funds will be disbursed. This notification is sent as part of the award

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letter. If the funds include a Direct Loan the notice will indicate which funds are from subsidized loans and which are from unsubsidized loans. WCC will notify the student, in writing, of the anticipated date and amount of the disbursement and the student's right to cancel all or part of the loan or disbursement. If a student elects to take DL funds, the student will meet in person with the financial aid advisor to sign the award letter and other required paperwork. WCC financial aid staff and District Operational Services Office will have three business days to disburse funds to student accounts once received in the Federal Funds.

#### **Student & Parent Authorizations**

Students are notified via a student receipt and copy of student ledger when funds are disbursed. When loan funds are included in a disbursement, the student may refuse loan funds and sign a Cancel Loan form on the date of disbursement.

#### Disbursing Title IV Funds to Students

WCC disburses all FSA funds by crediting the student ledger account. If an FSA credit balance exists, it is issued to students by paper check that is cut in the Operational Services Office within 14 days of disbursement.

Disbursing Title IV Funds to Pay Institutional Charges for Educationally-Related Activities (Other Than Tuition, Fees, Contracted Room & Board, & Minor Prior-Year Charges)
WCC assesses no charges, other than tuition, textbooks, supplies and fees.

#### Holding Excess Title IV Funds (Credit Balances)

The Financial Aid Office Staff will evaluate the accounts periodically to ensure no credit balances exist on Title IV funds. Any FSA credit balance will be paid to the student within the 14 day regulatory timeframe unless the student has signed a Voluntary Authorization to Retain Funds form.

#### Title IV Eligibility & Payment Information

WCC will notify students of the amount of funds the student can expect to receive from each FSA program, and how and when those funds will be disbursed. This notification will be sent before the disbursement is made. Notification will be in writing, which may be hand or electronically delivered. Before a student takes out a loan, the student will be required to complete a MPN and Entrance Counseling on the Direct Loan website at <a href="https://studentloans.gov">https://studentloans.gov</a>. Exit Counseling on the NSLDS website will also be provided before the borrowing student completes his course of student or otherwise leaves school. This allows the student with little or no experience with repayment or managing debt to have information regarding budget development and debt management strategies and types of tax benefits available to borrowers. Personal and contact information is available to the DL servicing center through the NSLDS site. If a student fails to complete the Exit Counseling online, WCC will mail materials to the student within 30 days of their exit date with instructions for the student to complete the paperwork and return it to WCC so that we can forward it onto NDSLS. Staff is always available to answer student questions. Students are provided with a fee chart which explains all program expenses during their financial aid meeting before school begins.

#### Crediting Title IV Loan Proceeds & Borrower's Cancellation Rights

WCC will notify the student, in writing, of the anticipated date and amount of the disbursement and the student's right to cancel all or part of the loan or disbursement and the time by which the student must notify the school that they wish to cancel the loan or disbursement.

## Crediting Post-Withdrawal Disbursements Containing Title IV Loan Proceeds & Borrower's Cancellation Rights

When a Return to Title IV (R2T4) calculation reveals a student is entitled to a post-withdrawal disbursement and the student still owes institutional charges, the student is notified that those charges can be partially or fully satisfied through a post-withdrawal loan disbursement. The student then has the opportunity to notify the Financial Aid Office to carry out the loan disbursement or refuse and cancel the

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loan disbursement.

#### Offering Post-Withdrawal Disbursements Not Credited to Student's Account

When a Return to Title IV (R2T4) calculation reveals a student is entitled to a post-withdrawal disbursement through Pell funds, the post-withdrawal disbursement is made by the Financial Aid Office, through GEMCOR, and sent to the student at their last known address. When post-withdrawal funds include loan monies, the student is given the opportunity to notify the Financial Aid Office to carry out the loan disbursement or refuse and cancel the loan disbursement.

#### Section 17 Satisfactory Academic Progress (SAP)

Students are required to maintain Satisfactory Academic Progress (SAP) throughout their training to be in compliance with institutional policy and to remain eligible for Title IV, HEA federal student financial assistance. SAP is measured in both quantitative terms (attendance), as well as qualitative terms (academics/grades). Student must meet Waynesville Career Center's attendance standard and the academic standard on a cumulative basis (start date to evaluation date) to maintain eligibility for federal student financial assistance funds unless the student is on "Financial Aid Warning" as defined in this policy. In the event that an evaluation period results in the determination that a student is not meeting WCC's attendance and academic standards, or that the student is not in compliance with the terms of an academic plan developed in accordance with this policy, the institution will notify the student of that determination.

#### Review and Evaluations Periods

Student progress will be reviewed by WCC on a monthly basis to identify students who may be at risk regarding satisfactory academic progress. At risk students will be counseled and will be advised regarding efforts to improve progress. Formal satisfactory academic progress evaluations, which determine continuing eligibility for federal student aid, will be calculated as of the date that the student completes each financial aid payment period. Completion of a payment period is considered to have occurred when the student has completed both the number of clock hours in the payment period, as well as the number of instructional weeks in the payment period. Student who meet the attendance and academic standards described herein will be considered to be making satisfactory academic progress until the next scheduled evaluation.

| Program                  | Clock Hours | PP1     | PP2        | # of Weeks |
|--------------------------|-------------|---------|------------|------------|
| <b>Practical Nursing</b> | 1425        | 0-712.5 | 712.5-1425 | 23 Weeks   |
| T&I Programs             | 1020        | 0-510   | 510-1020   | 18 Weeks   |
| Cosmetology Instructor   | 630         | 0-315   | 315-630    | 9 Weeks    |
| Cosmetology              | 1220        | 0-610   | 610-1220   | 32 Weeks   |

#### Financial Aid Warning

Students who fail to meet either of the two progress standards as determined by a SAP evaluation will be placed on Financial Aid Warning (FAW) status, and the student will remain eligible for federal student aid funds for the subsequent payment periods. A student may not be placed on FAW for consecutive payment periods. At the end of the FAW period, the student must be meeting the published attendance and academic standards on a cumulative basis to be considered as making satisfactory academic progress and to remain eligible for further federal student financial aid.

#### Qualitative: Cumulative Grades

Students must meet the standards of the Waynesville Career Center in order to retain eligibility and remain in good standing. The qualitative component includes grades, work

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projects completed, or other comparable factors. The WCC uses a student's cumulative grade to determine compliance with the qualitative component of SAP. A student must meet the required cumulative grades below at the end of each payment period to meet this standard.

| • | Practical Nursing                    | 80% |
|---|--------------------------------------|-----|
| • | Trade & Industrial                   | 70% |
| • | Cosmetology & Cosmetology Instructor | 75% |

Each student's cumulative grade will be reviewed by the financial aid staff at the completion of each payment period.

#### Quantitative: Hours to be Completed for Payment Period

Students must complete 96% **or more** of the clock hours for which they are enrolled during each enrollment period (coincides with payment period) to meet SAP. Students must meet those requirements in order to remain enrolled. The first disbursement of Title IV funds for first time entering students at WCC requires no progress check provided the first disbursement is issued during the payment period of training for a new student. At the end of their first payment period students must be making satisfactory progress.

#### Cosmetology Program

Any hours missed in the Cosmetology Program **must** be made up to complete the program. The Cosmetology students will be allowed to make up missed hours on the **pre-scheduled** "Friends and Family" activity days/evenings.

Cosmetology students will have 63 weeks to complete the program. If it is determined that 1220 hours cannot be completed, mathematically, by the scheduled completion date, the student will be dismissed.

Class cancellations for inclement weather, instructor illness, etc. will not count against student attendance and will extend the student's scheduled completion date.

#### Pace: Maximum Time Frame to Complete a Program

Maximum Time Frame or Pace of program completion is an additional quantitative standard of Satisfactory Academic Progress. Students may take up to 105% longer than the normal time of the program they are enrolled in to complete that program and still be in good standing with Financial Aid requirements. Once a student has received aid for the number of hours in their enrolled program, a student will NOT be eligible for Title IV federal financial aid and any charges will be the responsibility of the student.

#### Transfer Students from Other Institutions

Waynesville Career Center does not accept transfer of credit or clock hours from any other institutions.

#### Transfer Students from WCC

The Practical Nursing & Certified Nursing Assistant programs do not accept transfer students. There are no exceptions to this policy.

The Cosmetology Program does not accept transfer hours/students. However, the following exception may apply:

- Student who previously attended the Cosmetology Program at WCC may be permitted to bring in previously completed hours from the WCC program under ALL of the following conditions:
  - o The student left the program in good standing
  - o Transfer hours will only be accepted when the student enrolls no later than 180 calendar

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days after the conclusion of the prior attendance period

- The student meets all other enrollment requirements
- Approval must be granted by WCC administration

The Trade & Industry Programs do not accept transfer hours/students. However, the following exceptions may apply:

- Students who previously attended the first half of the Trade & Industry program at WCC as a high school student may be permitted to finish the program as an adult student under All of the following conditions:
  - o The student completed the first half of the program in good standing
  - Transfer hours will only be accepted when the student completes the first half of the program in May as a high school student, and applies for re-enrollment as an adult student, the follow August.
  - o The student meets all enrollment requirements
  - o Approval must be granted by WCC Administration

All accepted transfer students tuition, fees, textbooks, etc. will be prorated based on the number of hours needed to complete the program.

#### Transfer Students between WCC Programs

Once enrolled, student are not permitted to transfer between programs.

#### Repetitions, Withdrawals, Incompletes, Remedial and ESL Courses

Waynesville Career Center does not offer grades of "incomplete" and accordingly, these have no impact on SAP. If a student withdraws from a program of study and re-enrolls in the same program within 180 days of withdrawal, the student is treated as returning to the same payment period that was in place when the student withdrew and must complete any clock hours for which the student previously received federal funding before being eligible for additional funding. A student who returns to a program after more than 180 days have elapsed since withdrawal may be eligible for federal aid for any classes the student must repeat to obtain academic credit. Students should meet with a financial aid advisor to discuss the conditions under which federal aid may be awarded for repeated courses. The institution does not provide non-credit remedial courses.

#### Terms of Enrollment

Terms of enrollment or periods of enrollment vary by program at Waynesville Career Center. Some programs include summer months as part of the period of enrollment. Regardless of the calendar for a program of study, payment periods and periods of enrollment vary be program. Programs that include summer months will complete 1425 clock hours in an 11 month period of enrollment. SAP is determined for each payment period.

#### Record Keeping Process for Satisfactory Academic Progress

An individual folder is maintained for each student and progress reports are issued on a regular basis. Agencies providing financial assistance to students, and which require notice of progress, will be notified within thirty days of the withdrawal or termination of a student.

The Satisfactory Academic Progress standards to be monitored include:

- Student maintain a cumulative grade per program policy
- Student is absent less than 5% of a payment period
- The student maintains a pace of progress that assures completion of a program in no more than 105% of the published time for that program.

Financial aid staff will monitor the following sources of information to determine that students are

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#### meeting the standards:

- Cumulative Grade as recorded in the TRAX system through GEMCOR.
- Attendance as recorded in the TRAX system through GEMCOR.
- Enrollment status and course load
- Progress reports as recorded by instructional staff and support staff in the TRAX system through GEMCOR.

#### **Section 18**

#### **Return of Title IV Funds**

#### Process Overview & Applicability

WCC will determine the earned and unearned portion of Title IV aid as of the date the student ceased attendance based on the amount of time the student was scheduled to be in attendance. After the 60% point in the payment period, the student has earned 100% of the Title IV funds he or she was scheduled to receive during the payment period.

#### Withdrawal Date

When a student begins the official withdrawal process or provides official notification to the WCC Financial Aid Office of his intent to withdraw, the date of the student's withdrawal would be the date the student began the official withdrawal process, or the date of the student's notification, whichever is later. If a student did not begin the official withdrawal process or provide notification of his or her intent to withdraw, the date that the student withdraw would be the date of the student's last date of attendance (LDA). For a student who unofficially withdraws (students who do not inform the school directly), students must be considered unofficially withdrawn after 5 consecutive calendar days of absence and have not contacted the school. If a student does not officially withdraw from their program, WCC will consider the date for calculating refunds as the unofficial withdrawal date of the student's last date of attendance (LDA).

#### Formula Calculations

WCC Financial Aid Office uses the payment period R2T4 calculation to determine whether a post-withdrawal disbursement should be made. R2T4 calculations will be completed within 10 days of notification of a student's withdrawal. WCC and GEMCOR utilize the R2T4 calculation tool provided by the U.S. Department of Education.

#### Post-Withdrawal Disbursements

When a Return to Title IV (R2T4) calculation reveals a student is entitled to a post-withdrawal disbursement through Pell funds, the post-withdrawal disbursement is made by the Financial Aid Office, through GEMCOR, and sent to the student at their last known address. When post-withdrawal funds include loan monies, the student is given the opportunity to notify the Financial Aid Office to carry out the loan disbursement or refuse and cancel the loan disbursement.

#### Returning Unearned Funds

When the R2T4 calculation determines that unearned Title IV funds were disbursed to a student, WCC will return those funds to all applicable sources. When Pell funds are a part of the return process, the student's award will be adjusted and sent to COD and those funds will be returned to USDE. Refunds or returns will be processed within thirty days of notification of the student's withdrawal. Refunds due shall be paid in the following order:

- Unsubsidized Direct Loan (Title IV)
- Subsidized Direct Loan (Title IV)
- Direct PLUS Loan (Title IV)
- Pell Grant (Title IV)
- A+ (State of Missouri Funds)
- Private Scholarships

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Personal Funds

#### **Over-award Resolution**

To resolve an over-award, WCC will promptly attempt to recover the over-payment by notifying the student in writing, and requesting full payment. The notice will state that if the student fails to repay the over-payment or make satisfactory arrangements for repayment, he or she will be ineligible for Title IV funds until the over-payment is resolved.

If the student claims that the school made a mistake in determining the over-payment, we will consider any information he or she provides and decide whether the objection is warranted. If, after notification to the student and consideration of possible objections, an over-payment remains and the student has not repaid or made satisfactory arrangements to repay the over-payment, the student's over-payment will be reported to NSLDS and WCC will refer the over-payment to USDE for collection.

#### Section 19

#### **Return of Tuition Assistance Funds**

Military tuition assistance (TA) is awarded to a student under the assumption that the student will attend school for the entire program for which the assistance is awarded. When a student withdraws, the student may no longer be eligible for the full amount of TA funds originally awarded.

To comply with the new Department of Defense policy, Waynesville Career Center will return any unearned TA funds on a proportional basis through at least the 60% portion of the period for which the funds were provide. TA Funds are earned proportionally during an enrollment period, with unearned funds returned based upon when a student stops attending.

If a service member stops attending due to a military service obligation, Waynesville Career Center will work with the affected service member to identify solutions that will not result in a student debt for the returned portion.

#### Withdrawals & Calculation

A student's official withdrawal date is used as the last date of attendance and to calculate the earned percentage of TA. A student's official withdrawal date is determined by using the last date of attendance that is documented and submitted to the financial aid office.

Once the last date of attendance is determined, Waynesville Career Center will recalculate a student's TA eligibility based on the following formula:

| Number of Days Completed                            |  | Percent of TA Earned |
|---|--|----------------------|
| <b>Total Days of the Course</b> (start to end date) |  |                      |

The amount of TA funding that is earned is determined on a pro-rata basis. For example, if a student completed 30% of the course, s/he earned 30% of the TA funds that s/he was originally scheduled to receive. The remainder of the unearned funds (70%) would be returned to the TA program. If this results in an unpaid tuition balance, payment would be the responsibility of the student. Once a student has attended at least 60% of the period for which TA funds were approved, the student is considered to have earned 100% of the TA funds.

#### Return of funds of Unearned TA (to the Government)

Please see below WCC's policy on returning unearned TA funds to the government upon dismissal/withdrawal of student.

#### PRACTICAL NURSING - 1425 Hours

Before Class Begins 100% Return to TA 1 – 357 Hours 75% Return to TA

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358 – 714 Hours 50% Return to TA

715 – 1071 Hours 25% Return to TA (60% completion of course)

1072 – 1425 Hours 0% Return to TA

#### TRADE & INDUSTRIAL PROGRAMS - 1020 Hours

Before Class Begins 100% Return to TA 1 – 270 Hours 75% Return to TA 271 – 540 Hours 50% Return to TA

541 – 648 Hours 25% Return to TA (60% completion of course)

649 – 1020 Hours 0% Return to TA

#### **COSMETOLOGY - 1220 Hours**

Before Class Begins 100% Return to TA 1 – 305 Hours 75% Return to TA 306 – 610 Hours 50% Return to TA

611 – 732 Hours 25% Return to TA (60% completion of course)

733 – 1220 Hours 0% Return to TA

#### **COSMETOLOGY INSTRUCTOR - 630 Hours**

Before Class Begins 100% Return to TA 1 – 157 Hours 75% Return to TA 158 – 314 Hours 50% Return to TA

315 – 378 Hours 25% Return to TA (60% completion of course)

379 – 630 Hours 0% Return to TA

#### **Section 20**

#### **Institutional Refund Procedures**

Waynesville Career Center has developed this institutional policy to meet all federal, state and accreditor regulations. To ensure that prospective and enrolled students are adequately informed with regard to refund of tuition paid in the event of dismissal or resignation from their programs of study.

#### Balances Due

A student leaving WCC with a balance due to the school must either pay the entire balance or make monthly installment payments to pay off the outstanding balance. WCC may withhold the student's official transcript until the outstanding balance is paid in full.

#### Refunds for Students who Withdraw On or Before the First Day of Classes

In the event that a student officially withdraws on or before the first day of class, the school will refund any fees paid to the school in excess of \$100.00 and 100% of tuition. Students who officially withdraw after the first day of class are responsible for 100% of fees and tuition is refunded according to the refund schedule for early withdrawal. The school will issue the appropriate refund within 45 days of the class start date.

#### Early Withdrawal

Students who are considered to have withdrawn from their programs if they do not complete all of the clock hours and weeks of instructional time required to complete the program. In the event that a student withdraws, whether voluntarily or involuntarily, all refunds will be made according to the refund schedules outlined in this policy.

#### **Refund Calculations**

WCC bases refund calculations on payment periods associated with the clock hour and weeks of attendance for programs as defined by the Department of Education and Council on Occupational Education (COE) accreditation. The payment periods for programs are as follows:

#### **Trade & Industry Programs:**

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2 Payment Periods - 1020 Clock Hours and 36 Weeks

1<sup>st</sup> Payment Period 0-510 hours and 0 weeks (August to Mid-January)

2<sup>nd</sup> Payment Period 511-1020 hours and 18 Weeks (Mid-January to May)

#### **Practical Nursing Program:**

2 Payment Periods - 1425 Clock Hours and 46 Weeks

1st Payment Period 0-712.5 hours and 0 weeks (August to End of January)

2<sup>nd</sup> Payment Period 713-1425 hours and 23 weeks (End of January to June)

#### **Cosmetology – Evening Program:**

2 Payment Periods - 1220 Clock Hours and 63 Weeks

1st Payment Period 0-610 hours and 0 weeks

2<sup>nd</sup> Payment Period 611 hours and 32 weeks

#### **Cosmetology Instructor Program:**

2 Payment Periods - 630 Clock Hours and 34 Weeks

1st Payment Period 0-315 hours and 17 weeks

2<sup>nd</sup> Payment Period 316-630 hours and 17 weeks

#### Academic Year Definition

An academic year is defined in 1020 clock hours and 36 weeks for Trade & Industry programs, 1425 clock hours and 46 weeks for Practical Nursing, 1220 clock hours and 63 weeks for Cosmetology, and 630 clock hours and 34 weeks for Cosmetology Instructor program. Payment periods for full academic years are 510 clock hours for Trade & Industry programs, 712.5 clock hours for Practical Nursing, 610 clock hours for Cosmetology and 315 for Cosmetology Instructor.

#### Refund Schedule for Early Withdrawal – Fees and Supplies

Fees that must be paid to external entities before enrollment as part of a program's application process such as drug screening charges and background check fee are not considered program tuition and are non-refundable.

Fees that must be paid to the school before enrollment as part of a program's application fees and acceptance fees may be partially refundable if these fees are in excess of \$100.00. Students who officially withdraw on or before the first day of classes will be refunded any of these fees paid in excess of \$100.00.

Students who officially withdraw after the first day of their program are responsible for 100% of any textbook, supply or fee expenses incurred by the institution.

#### Refund Schedule for Early Withdrawal - Tuition

If a student withdraws from his/her program, voluntarily or involuntarily, on or before the first day of the program, the student will be refunded 100% of any tuition collected within 45 days of the program start date.

If a student withdraws from his/her program, voluntarily or involuntarily, within (7) seven calendar days of the beginning of a payment period, the student will not owe WCC any of the tuition charged for that payment period. The student will, however, be responsible for any previous balance due to WCC.

If a student withdraws from his/her program, voluntarily or involuntarily, after (7) seven calendar days of the beginning of the payment period, but before 60% of the hours in the payment period have occured, the student will owe WCC prorated tuition for that payment period and any previous remaining balance due. The tuition will be prorated based on the percentage of hours possible at the time of withdrawal. For example, if there are 450 hours in a payment period and the student withdraws after 225

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hours, then the student will owe for half the tuition because they withdrew after half the hours (225/450=50%).

If a student withdraws from his/her program, voluntarily or involuntarily, after 60% of the hours in a payment period, the student will owe WCC 100% of any of the tuition charged for that payment period and any previous remaining balance due.

If a student withdraws from his/her program, voluntarily or involuntarily, at any time and is due a refund based on the refund calculations, it will be processed and distributed to the student within 45 days of the last day of attendance. All refunds will be processed by Waynesville Career Center without a request from the student.

If a student withdraws from his/her program, voluntarily or involuntarily, at any time and is due a refund based on the refund calculations, it will be processed and distributed to the student within 45 days of the last day of attendance. All refunds will be processed by Waynesville Career Center without a request from the student.

#### **Section 21**

#### Leave of Absence

Leave of Absences are not allowed for any student enrolled at Waynesville Career Center.

#### Section 22

#### **Title IV Fraud**

#### Student Fraud

A student who has been convicted of, or has pled no contest or guilty to, a crime involving fraud in obtaining Title IV aid must have completely repaid the fraudulently obtained funds to the Department or the loan holder before regaining aid eligibility. The school's administration will decide whether the incident should be reported to USDE's Office of the Inspector General.

#### Institutional & Third Party Fraud

WCC contracts with a third-party servicer to complete the processing of student financial aid. GEMCOR, Inc. is located at 400-D Quadrangle Drive, Bolingbrook, Illinois 60440. Phone and fax are 888-436-2678 and 888-943-6267. All referrals to the Inspector General should be submitted as stated in Section 34 CFR 668.16(g) OIG referrals.

#### **Section 23**

#### **Audit Requirements**

#### GEMCOR's Preparation for Audit

On an annual basis, all Title IV program activity for all federal awards in GEMCOR's systems is reconciled with the department's COD and GAPS systems. Audit Packages for WCC are completed identifying all federal aid activity and cash accountability for both the most recently completed institutional fiscal year, as well as for the most recently completed federal award year. Each year WCC schedule's an annual audit, notifying GEMCOR for preparation of our audit packages. GEMCOR also has an annual compliance audit performed on its administration of federal aid program funds for Waynesville Career Center.

#### Audit Submission Schedule

District audits are submitted annually through USDE's website <a href="https://ezaudit.ed.gov">https://ezaudit.ed.gov</a>, no later than December 31st of each year or within six months of the end of the school's fiscal year.

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