

# **Ecclesia College**

## **Financial Aid**

### **Handbook**

#### **2024 - 2025**

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## APPLYING FOR FINANCIAL AID

**PURPOSE:** To explain the method of applying for financial aid.

**POLICY:** The financial aid application process begins each October 1<sup>st</sup> for the following academic year. Students who need financial assistance to cover college expenses must file a Free Application for Federal Student Aid (FAFSA) each year. Forms are available in the Financial Aid Office for all students and at public and private high schools for entering freshmen. The deadline for priority consideration is posted no later than the beginning of each application period in the Financial Aid Office. The FAFSA may be completed on the website at [www.fafsa.ed.gov](http://www.fafsa.ed.gov). The FAFSA Processing System (FPS) uses the information from the FAFSA to calculate the student's official Student Aid Index (SAI). The Processor will conduct electronic matches with the Social Security Administration, VA, and Department of Homeland Security to determine eligibility for federal aid. The results are transmitted electronically to the College.

**PROCEDURE:** Applying for financial aid is a lengthy process which requires careful completion of forms, attention to deadlines, and prompt response if additional information is requested by the institution. Due to limited financial aid funds, most forms of aid are awarded to students whose files are completed accurately and on time. A student's application will not be reviewed until all required documents required to complete the file are received in the Ecclesia College (EC) Financial Aid Office. Those applicants who complete the application process after the deadline and who are eligible will be considered and assisted to the extent that funds permit. Failure to accurately report information sought on the application or on supporting documents may result in the suspension or termination of financial aid eligibility.

Students selected for Federal Verification must complete a Verification Form(s) and any requested documents required by the Financial Aid Office that confirm the data submitted in the FAFSA.

### FAFSA YEAR CLARIFICATION

Students apply for the academic year consisting of Fall and Spring. As such, if a student was planning on attending in Fall-Spring of 2024-2025, the student would complete the 2024-2025 FAFSA. If they were only attending Spring 2025, they will still fill out the 2024-2025 FAFSA.

## Eligibility

To qualify for most types of Federal Financial Aid, you must satisfy the following requirements:

- Be fully admitted to the college with a High School Diploma, Home School Diploma (Arkansas does not require secondary completion credentials), or its equivalent (i.e., GED)
  - Recognized equivalents of High School Diploma include: an associate's degree, successful completion of 60 semester or trimester hours or 72 quarter credit hours not resulting in an associate degree but is acceptable towards a bachelor's degree.
  - For non-traditional age students and/or transfer students, the College may use a student's self-certification on the FAFSA that he or she obtained a high school diploma. However, if the College has reason to believe that the high school diploma is not valid or was not obtained from an entity that provides secondary school education or if the student was placed in a Verification Tracking Group that requires verification of high school completion status, Ecclesia College will implement procedures to evaluate the validity of the student's high school completion.
- Have a complete Financial Aid file — all documents turned in as necessary ·
- For federal financial aid (Pell grant, SEOG, or federal loans), be a U.S. Citizen or eligible non-citizen
- Be enrolled at least half time for Direct Loans (DL)
- Meet Satisfactory Academic Progress standards.

Defined in law, in regulation, or as guidance from the U.S. Department of Education, these policies and procedures facilitate the effective operation of the federal processing system and of the reporting systems for individual programs. The term FSA refers to need-based grant, loan, and work-study programs administered by the U. S. Department of Education. The FSA Programs administered by the College, comprise the: Federal Pell Grant, Federal Supplemental Educational Opportunity Program (FSEOG), Federal Work Study (with Work Colleges distinctive) and Direct Loans. To qualify for assistance students must meet the following basic eligibility requirements: demonstrated financial need; citizen or eligible non-citizen; not in default on a loan or owe a repayment on Title IV aid received at any institution; enrolled at least half-time in an eligible program of study for DL; maintain Satisfactory Academic Progress (SAP); and have completed secondary education. **Title IV, HEA program funds will not be disbursed unless all eligibility requirements have been met.**

PROCEDURE Financial need is simply defined as the difference between the students cost of attendance (COA) and the family's ability to pay these costs. Education costs for the FSA Programs are defined by statute and are fairly easy to calculate based on the student's tuition and fee charges, living situation (e.g., on campus, off campus with parents, off campus without parents) as well as other factors affecting the student. The Student Aid Index (SAI) is an eligibility index for student aid. If the SAI is less than the COA, the student is considered to have

financial need and thus will be eligible for aid from the FSA Programs, provided that he or she meets the other eligibility requirements of these programs.

## **Professional Judgement in Title IV Programs**

The EC Financial Aid Office has the authority to use professional judgment to adjust the SAI for the FSA Programs on a case-by-case basis to allow for special circumstances. Such adjustments must be documented in the student's file.

Professional Judgement is a decision to alter a student's federal financial aid calculation based upon deliberate, well considered determination by a financial aid professional. By regulation, professional judgements can only be exercised under the authority of the "capable individual" which is the Director of Financial Aid and is responsible for the rational, accuracy and level of documentation for each judgement made.

The Financial Aid Administrator and/or Servicer will work with the student/family to gather and review all information as submitted for the Professional Judgement. They will review the file for completeness/reasonableness before submitting the file for review by the Director of Financial Aid. The Director of Financial is responsible for making reasonable professional judgment decisions.

All professional judgments must be made on a case-by-case basis based upon unusual, exceptional, or mitigating student or family circumstances. It is not acceptable to create specific standards under which professional judgment will or will not be performed. The purpose of professional judgment is to allow for exceptions to be made in unusual cases, not to create a local set of eligibility rules.

A professional judgment review allows for a financial aid adjustment due to a significant change in current income compared to the required tax data reported on the FAFSA. This can be due to the recent unemployment of a direct family member (mother or father) of a dependent student or the recent unemployment of an independent student, or other circumstances.

In general, professional judgment should only be used if:

- the action is in the best interest of the student and the integrity of the Title IV
- programs,
- the student's circumstance is such that the standard program rules and operating procedures would not result in a financial aid package that accurately depicts the student/family's ability to contribute to the student's educational costs based on extenuating circumstances not otherwise discussed on the FAFSA.
- the student's circumstance is unusual and is not primarily the result of voluntary or irresponsible action taken by the student and/or parent/spouse, and there is no reason to believe that the student and/or parent/spouse are being un-truthful regarding his/her circumstance.
- Other circumstances may include:
  - Involuntary loss of income due to reduced hours or shutdowns
  - Loss of income due to disability

- Change in financial situation due to separation or divorce.
- Death of spouse for independent undergraduate student
- Significant medical expenses not covered by insurance.

Types of Judgments: There are essentially four types of professional judgment, as follows:

- 1) **Dependency Overrides (Unusual Circumstances)** – These judgments require the highest level of documentation and should be used sparingly. The mere separation of the student from the parent’s residence, proof of self-support, and/or emotional estrangement are not sufficient to substantiate a dependency override without underlying exceptional circumstances.
- 2) **Modifications to FAFSA data to update the SAI (Special Circumstances)** – Changes may be made to any of the data elements used in the calculation of the SAI. These changes must be submitted to the federal processor for re-calculation of an “official” SAI. In addition to documenting the circumstances surrounding the judgment, the Financial Aid Office must record the exact data changes that are made to the FAFSA data.
- 3) **Changes to Cost of Attendance (COA) (Special Circumstances)** - The level of documentation required for a change to the Cost of Attendance is not as great as the standard required by the school for dependency overrides or modifications to FAFSA data. For example, the Director of Financial Aid might choose to add childcare or elder care expenses to a Student’s COA, one time computer/technology purchase or professional licensure examination fees required for employment in the student’s field of study.
- 4) **Additional Unsubsidized Loan for Dependent Student** - If a student’s parent is clearly incapable financially of being approved for a PLUS loan or is likely to be unable financially to repay the loan if approved, the student may be made eligible for the same additional unsubsidized loan limits as would be available to an independent student. Some specific examples of circumstances which meet this standard are provided in regulation, are including but not limited to declaration of bankruptcy disallowing applying for any additional loans, social services recipients, and or proof of income below the established poverty line. However, the refusal of an otherwise eligible parent to apply for a PLUS loan is NOT in itself grounds for using professional judgment.

There are circumstances that do not warrant a professional judgment review. These include, but are not limited to: Credit card debt, vacation expenses, car payments, or mortgage payments. Also, undergraduate students who already have an SAI less than or equal to 0 do not qualify for a Professional Judgment review since they have already received the maximum amount of aid for which they are eligible.

Verification and PJ: Prior to completing a Professional Judgment in Modifications to FAFSA data to change SIA or Changes to Cost of Attendance any required verification must be completed. This applies only to those applications selected for verification by the federal processor, or those institutionally selected by the school and/or its servicer. However, these verifications are subject to the exclusions listed in federal regulation and the Federal Student Aid Handbook. Often the documents collected for verification will also be useful in the Professional Judgment process. Refer to the Federal Student Aid Handbook for more detailed information.

## **AWARD PACKAGING AND NOTIFICATION**

**PURPOSE:** To explain the method used for award packaging and notification.

**POLICY:** Packaging is the process of finding the best combination of aid to meet a student's financial need, given limited resources and institutional constraints. The College reviews its packaging philosophy each year based on federal regulations and enrollment trends. A student who has applied for financial assistance will be notified in writing of the decision of the Financial Aid Office. The financial aid award process will not begin until all required documentation has been received by the Financial Aid Office.

**PROCEDURE:** A financial aid award may consist of a combination of grants, loans and employment based on the student's financial need, funds requested by the student and available resources. The award is contingent upon receipt by the College of funds from the appropriate agencies (federal, state, etc.)

It is the student's responsibility to review the award and all its conditions prior to accepting the aid offer. If the student wants to reduce or decline a specific award, the award must be returned with the appropriate notations, otherwise, it is assumed that the award has been accepted as issued. Any additional documents sent with the award that requires the student's signature (e.g., promissory notes, entrance counseling, etc.) must be returned for the award to be paid.

## Award Formulas for Title IV Programs

Title IV Programs: Pell, SEOG, and Direct Loan

**All EC programs: credit-hours**

### I. Timing of disbursements: Student Loans

#### A. Method of Delivery: In Person

1. Thirty calendar days after the student's program of study begins for first time borrowers.
2. Twenty-one calendar days after the student's program of study begins for non-first-time borrowers
3. Financial Aid process must be completed for A-1 and A-2 to apply. If not, disbursement will be the number of calendar days applicable after Financial Aid process is completed.
4. Students must have started six hours or more.

#### B. Method of Delivery: Online

1. Thirty calendar days after the student's program of study begins for first time borrowers.
2. Twenty-one calendar days after the student's program of study begins for non-first-time borrowers.
3. Financial Aid process must be completed for B-1 and B-2 to apply. If not, disbursement will be the number of calendar days applicable after Financial Aid process is completed.
4. Students must have started six hours or more.

#### C. Disbursements based on sub-term enrollment (see example below).

### II. Timing of disbursements: Pell Grant

#### A. Method of Delivery: In Person

1. Twenty-one calendar days after the student's program of study begins.
2. Financial Aid process must be completed. If not, disbursement will be the number of calendar days applicable after Financial Aid process is completed.

#### B. Method of Delivery: Online

1. Twenty-one calendar days after the student's program of study begins.
2. Financial Aid process must be completed. If not, disbursement will be the



number of calendar days applicable after Financial Aid process is completed.

C. Disbursements based on pro-rated sub-term enrollment (see example below).

### III. Timing of disbursements: Institutional Scholarships

#### A. Method of Delivery: In Person

1. Financial Aid process must be completed. If not, disbursement will be the number of calendar days applicable after Financial Aid process is completed.
2. Students must have completed 61% of Financial Aid period prior disbursement.

#### B. Method of Delivery: Online

1. Twenty-one calendar days after the student's last hours of program of study begins.
2. Financial Aid process must be completed. If not, disbursement will be the number of calendar days applicable after Financial Aid process is completed.

### IV. Timing of disbursements: External and State Scholarships

#### A. Method of Delivery: In Person

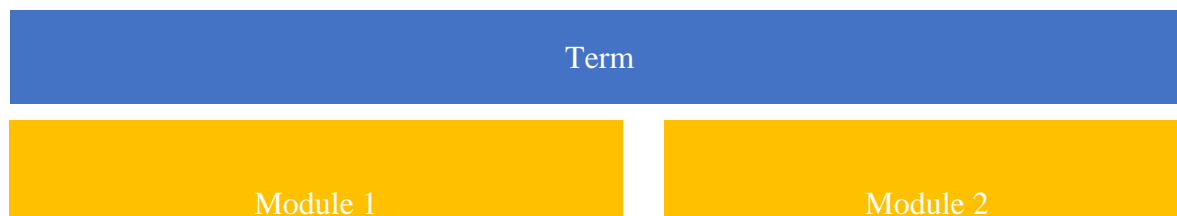
1. Twenty-one calendar days after the student's program of study begins or when the external or state scholarship is received by the institution, whichever is later.
2. Financial Aid process must be completed. If not, disbursement will be the number of calendar days applicable after Financial Aid process is completed.

#### B. Method of Delivery: On-line

1. Twenty-one calendar days after the student's program of study begins or when the external or state scholarship is received by the institution, whichever is later.
2. Financial Aid process must be completed. If not, disbursement will be the number of calendar days applicable after Financial Aid process is completed.

## Term Disbursement Dates

The chart below reflects the setup of an Ecclesia Online semester (term) which consists of multiple modules a student can enroll. Therefore, disbursement dates will differ among students' aid eligibility and how they choose to enroll in their courses each term.



## Examples of Term Disbursements

- **Example 1:**

- An online undergraduate student eligible for Pell Grant is attending 3 hours in Module 1 and 3 hours in Module 2. She can expect half of her Pell Grant to disburse 21 days after her first class in Module 1 begins and the remaining half 21 days after the beginning of Module 2.
- If she were taking 2 classes in Module 2 only, she could expect her full disbursement of Pell Grant in Module 2.
- **Note:** Enrollment and pro-ration of Pell Grant applies to all combinations of enrollment. *While EC is in current HCM2 status, there may be exceptions to this disbursement schedule to the favor of the student.*

- **Example 2:**

- An online undergraduate student planning to borrow federal loans is attending 3 hours in Module 1 and 3 hours in Module 2. He meets all eligibility requirements and can expect the full loan to release to his student account 21 days after his Module 2 term class begins. His refund will be processed within 5 days after the funds are showing paid to his student account on Populi on the 25<sup>th</sup> day of enrollment. The refund will then be transferred for processing.
- If he were taking 2 classes in Module 1 only, his loan would disburse 21 days after Module 1 began.
- If he were taking all residential courses, his loan would disburse 21 days after the start of those courses.

- Note: The half-time enrollment and 21 day criteria apply to all combinations of enrollment for all students and levels.
- **Example 3:**
- A resident student is enrolled in 12 credit hours, 9 hours are resident courses and 3 hours are in the Module 1 through EC online. The student is eligible for student loans and resident scholarships. Student loans will disburse 21 days after the student begins the resident courses, but scholarships will not disburse until 21 days following the start of the Module 2. If there is a credit balance following any disbursement of aid, the process to refund the credit is guided by EC Business Office posting & refund policies.

### **General Scholarship Rules (GSR)**

- Your combined federal grants, state grants, and Ecclesia aid cannot exceed the combined cost of actual tuition and room and standard board charges.
- For online students, the GSR calculation only includes the cost of tuition, which means federal grants, state grants, and Ecclesia aid cannot exceed the actual cost of tuition & fees.
- If the combined aid exceeds the total cost as specified, Ecclesia aid will be reduced to resolve the excess aid. The Federal Pell Grant and Arkansas Challenge Grant is not included as a factor in the GSR for Resident students. All Ecclesia aid is subject to the GSR.

## **TYPES OF AVAILABLE FEDERAL FINANCIAL AID**

### **Pell Grant**

- Federal Pell Grants are undergraduate grant funds from the federal government. Pell awards must be applied for each year and are based on FAFSA eligibility. Students must begin attendance in all the classes for which they received Pell to establish eligibility.
- Awarded only up to twelve credit hours each semester.
- Pays towards outstanding balance first
- Must meet all federal eligibility requirements

### **Federal Supplemental Educational Opportunity Grant (FSEOG)**

- This federal undergraduate grant must be applied for each year and is for undergraduates with exceptional financial need. Pell Grant recipients with the lowest SAI's will be considered first for a FSEOG.

### **Federal Direct Subsidized Loan**

- The purpose of the Direct Loan is to provide low interest educational loans that enable a student to pay the cost of attendance. The federal government pays the interest on these loans while a student is in school.
- Must be enrolled at least half-time; six hours for undergraduates and masters; three hours for doctoral studies.
- Pays towards outstanding balance first
- Must meet all federal eligibility requirements

### **Federal Direct Unsubsidized Loan**

The purpose of the Federal Direct Unsubsidized Loan is to provide low interest educational loans that enable a student to pay the cost of attendance. The borrower is responsible for interest that accrues while in school, during a grace period, or during authorized periods of deferment or forbearance.

### **Federal Direct Parent Loan for the Undergraduate Student (PLUS)**

If you are their dependent, your parents may request a PLUS loan to borrow up to the cost of your attendance minus any other financial aid received. This loan is credit-based.

### **Work College Funding**

The Federal Work College funding is aid offered to students who have a demonstrated need. Please refer to the Ecclesia College Work Study Handbook.

The EC WLS program gives students the opportunity to gain work experience and reduce out of pocket cost of school while attending college. Employment through this program is dependent upon job skills, class schedule, and the available positions.

- Work College work is part-time employment which cannot exceed 20 hours per week

- WLS work is different from regular part-time employment.
- Money earned in a Work College job does not count as income when completing the FAFSA.
- Work College work is compensated every four weeks.
- Students are awarded funds based on the amount that a student can potentially earn but are only compensated for hours worked.

## **Disbursements**

EC will not disburse financial aid until the student's Financial Aid File is completed including all verification requirements. If a student is awarded financial aid prior to the payment deadline the aid should show online as a pending credit. The total amount of financial aid is generally credited to the student bill in two installments (half in the fall semester and half in the spring semester).

Grants, loans and installment payments credited to student accounts will be applied to all outstanding tuition charges before refunds are generated. Students are issued refunds if the credited financial aid is more than the charges.

1. Students who have been awarded Federal PELL Grant before the first day of classes will be able to retain their classes without payment until the Official Day of Record for the term, provided that the student's tuition and fee debt is less than, or equal to, the amount awarded. Payment will automatically be made to the Business Office on the Official Day of Record or by the 30th day of enrollment.
2. If the student's tuition and/or fee debt is more than the award for the term the student must make that payment on or before the payment due date listed in the Schedule of Classes for the term.
3. Students who are awarded Federal PELL Grant after the start of classes for the term will be award based on their enrollment level on: a) the student's Official Day of Record or, b) the date their file is completed in the financial aid office, whichever is later.

## **Direct / Parent PLUS Disbursements**

Most students apply for a Direct Loan in the fall to cover expenses during the fall and spring terms. Under the terms of this loan, half of the loan is disbursed in the fall and half is disbursed in the spring. When a loan is requested to cover expenses for one term only, funds are disbursed in two installments during that one semester (e.g., a fall only loan). EC will only certify up to half the annual loan limit for one term only applications (depending on eligibility requirements).

## **Loan Waiting Period**

EC does not disburse loan funds until after the thirty days for first time borrowers and twenty-one days for other students. If multiple disbursements are required within one term (i.e. one term only loan), the secondary disbursement will be released after midpoint of the semester has

passed. Tuition, fees, or other allowable institutional charges remaining from the beginning of the semester will be deducted from loan proceeds and the remaining balance will be auto-deposited. If a student chooses to receive the refund in the form of a paper check instead of auto-deposit, funds will be mailed to the address on file with SIS (Populi).

<b>Academic Programs of Ecclesia College 2023-2024</b>			
<b>All Programs: Term</b>			
<b>Degrees Offered</b>	<b>Method of Delivery: Traditional</b>	<b>Method of Delivery: Online</b>	<b>CIP Code</b>
Associates of Arts	Delivery in Person	Delivery Distance Education	24.0102
Associates of General Studies	Delivery in Person	Delivery Distance Education	24.0102
Associates of Biblical Studies	Delivery in Person	Delivery Distance Education	39.0201
Bachelors of Arts in Leadership	Delivery in Person	Delivery Distance Education	52.0213
Bachelors of Science Psychology and Counseling	Delivery in Person	Delivery Distance Education	42.2803
Bachelors of Biblical Studies	Delivery in Person	Delivery Distance Education	39.0201
Bachelors of Christian Leadership	Delivery in Person	Delivery Distance Education	39.0604
Bachelors of Science in Business Administration in Management	Delivery in Person	Delivery Distance Education	52.0201
Bachelors of Science in Business Administration in Marketing	Delivery in Person	Delivery Distance Education	52.0401
Bachelors of Science in Sport Management	Delivery in Person	N/A	31.0504
Master of Christian Leadership	Delivery in Person	Delivery Distance Education	39.0699

**Pell Grant Formula:** See attached SAI Chart.

**Pell Grant Disbursement:** Twenty-one days after student's program of study begins.

**Loan Disbursement Schedule:** Thirty days after student's program of study begins for first time borrowers; twenty-one days after program of study begins for all other students.

**Academic Year Definition:** For purposes of awarding Federal Student Aid, the definition of the Academic Year at Ecclesia College is thirty credits and thirty weeks.

**Minimum Full Time:** Twelve Credit hours per semester (regular term).

**Loans:** Limits are based on Scheduled Academic Year

## FDSL Program

### Loan Confirmation process

Ecclesia uses the active confirmation process for the Federal Direct Student Loan program by sending students electronic award letters. The student will either accept or reject award via logging into their Populi account. The student can also reduce the amount of an award by accepting only a portion of the award.

The College obtains written confirmation of the types and amounts of Title IV loans under a Master Promissory Note (MPN) that a student wants for an award year before the school credits the student's school account.

The Business Office will notify the borrower each time it credits the student's account with Title IV loan funds. The only exception to this rule is in the case of a post-withdrawal disbursement of loan funds that are applied toward the student's school charges. This notice provides the student or borrower with a final opportunity to change their mind about borrowing the loan funds, as well as instructions for returning those funds if they are no longer needed or wanted.

The College will send the notice of credit to the student's school account on the day the credit is disbursed via Populi.

**Note:** Students have the right to cancel all or a portion of the loan disbursement. If the student signed an award letter indicating the types of an amount of Title IV funds awarded before the account was credited, the student must request a loan return/cancellation by the later of the first day of the payment period or 14 calendar days after the date the school notifies the student of crediting the student's account. If the student did not sign an award letter, they must request loan return/cancellation within 30 calendar days of the date that the school notified the student. The student will be advised of the outcome of the request for cancellation.

### Student Eligibility for loans

To request Direct or PLUS loan funds for a student, Ecclesia must certify that the borrower is eligible for the loan award and must provide specific amounts and dates for each disbursement of the loan award.

Direct Loans have annual and aggregate limits that are the same for all students at a given grade level and dependency status. In general, Ecclesia will not certify a loan for more than the:

- amount the borrower requests
- borrower's cost of attendance
- borrower's maximum borrowing limit
- borrower's unmet financial need.

Ecclesia may submit the certification to the lender electronically or on the paper Federal Direct Loan School Certification form. Ecclesia must provide this certification each time it makes a



loan under an MPN.

The school's certification/origination includes the borrower's grade level, loan period, anticipated disbursement dates, and the amounts of the disbursements.

### **Entrance Loan Counseling/ Master Promissory Note/Exit Counseling**

All borrowers must complete entrance loan counseling. This can be done at the following website: <https://studentloans.gov/myDirectLoan/index.action>.

All borrowers must complete the Master Promissory Note. This can be done at the following website: <https://studentloans.gov/myDirectLoan/index.action>.

All borrowers must complete Loan Exit Counseling if the following conditions occur:

- Graduated or are going to graduate
- Change your attendance to less than half-time
- Withdrew from school or stopped attending
- Transferred to another school
- Took a leave of absence that was more than 180 days

The Exit Loan Counseling can be completed at the following website: <https://nslds.ed.gov>

### **Checklist for loan certification**

For all Direct and PLUS Loans, Ecclesia must confirm that the student and/or parent meet the definition of eligible borrower, including:

- Determining that the student is enrolled at least half-time and making satisfactory academic progress.
- Reviewing the NSLDS information on the ISIR to ensure that the student is not in default, does not owe an overpayment on an FSA grant or loan, and will not exceed the annual or aggregate loan limits.
- Ensuring that the amount of the loan, in combination with other aid, will not exceed the student's financial need.
- Ensure that the loan disbursement dates meet cash management and disbursement requirements.

*For a Direct Loan, Ecclesia must also:*

- Determine the student's Pell Grant eligibility and if eligible, include the grant in the student's aid package.
- For an unsubsidized Direct Loan, first determine the student's eligibility for a subsidized Direct Loan.
- Ensure that the amount of the loan will not exceed the student's annual or aggregate loan limit.
- Prorate the Direct annual loan limit for an undergraduate enrolled in a program or

remaining period of study that is shorter than an academic year.

### **Annual Loan Limits**

Direct Loans have annual loan limits, based on the student's dependency status and grade level. In some cases, the annual loan limits must be prorated (reduced). The annual loan limits are the maximum amounts that a student may receive for an academic year.

Depending on the academic calendar of the program, a student who has reached the annual loan limit cannot receive another Direct Loan until he or she either begins another academic year, or progresses within an academic year to a grade level with a higher annual loan limit.

- Direct loans have annual loan limits.
- There is an overall annual loan limit for Direct loans, and a separate limit for subsidized Direct Loans.
- Dependent students have a lower annual loan limit than independent students; if a dependent student's parent(s) cannot borrow a PLUS loan, the student becomes eligible for the higher Direct Loan limits for an independent student.
- The academic year is used as the basis for the student's annual loan limits.
- The student's maximum annual loan limit increases as the student progresses to higher grade levels. **This Must Be Verified from Student Transcripts for Hours Earned!**
- The loan limit may have to be prorated if the student's remaining portion of a program is less than an academic year.

### **Direct Loan Periods and Amounts**

Ecclesia College uses the Academic Year (AY) to determine when a student is eligible for a new annual loan limit. Generally, a student's grade level for loan limit purposes is set according to the College's academic standards.

### **Increased unsubsidized Direct limits for independent students and dependent students whose parents can't get PLUS**

There are higher additional unsubsidized annual loan limits for independent undergraduate students. These higher additional unsubsidized loan limits also apply to dependent undergraduate students whose parents are unable to borrow PLUS loans due to adverse credit or other documented exceptional circumstances.

Unsubsidized Direct loans are available for students whose parents have ended financial support and refuse to file a FAFSA. The College offers a dependent student an unsubsidized Direct Loan if the student's parents have ended financial support and refuse to file a FAFSA.

### **PLUS loan amounts for parents**

There are no fixed annual or aggregate loan limits for PLUS loans. The total PLUS Loan amount

borrowed by one parent or borrowed separately by more than one parent (including a non-custodial parent) may not exceed the student's estimated cost of attendance minus other financial aid awarded for the period of enrollment.

### **Grade Level Progression**

The annual loan limit for Direct Loans increases as a student progresses in his/her studies. Generally, a student's grade level for loan limit purposes is set according to the College's academic standards. Progression to a higher grade level does not always coincide with the beginning of a new academic year.

#### **Grade level progression within the same academic year**

In standard term programs, a student who has already borrowed up to the annual limit within an academic year can receive additional loan funds if the student progresses to a grade level with a higher annual loan limit during that same academic year.

When increasing the loan when grade level changes during academic year, the College may choose one of the following methods to increase the amount of an existing loan:

1. Certify/originate a new loan at the new grade level for the applicable amount (the difference between the new loan limit and the amount of the first loan). The loan period for the new loan must correspond to the term(s) during which the student qualifies for the higher loan limit (that is, it may not include a prior term when the student was classified at a lower grade level). If the new loan period is for a single term, the loan must be disbursed in two installments. (The school could also choose to cancel any pending disbursements of the first loan and certify/originate a new loan for an amount equal to the canceled disbursements of the first loan plus the additional amount for which the student is eligible due to the grade level change.)
2. Adjust the amount of the current loan. For FDSL, contact the lender to determine whether an increased loan amount due to grade level progression within an academic year may be processed as an adjustment without a new loan certification. If the increased amount is for a single term (for example, a spring semester), it must be disbursed in two equal installments, one at the beginning of the term and one at the midpoint.

With either option, the student's remaining financial need will be calculated using only the costs and estimated financial assistance for the term(s) during which the student qualifies for the higher loan limit.

### **Aggregate Loan Limits**

A borrower who has reached their aggregate borrowing limit may not receive additional loans. Once the loans are repaid, in full or in part, the borrower may apply for additional Direct Loans.

### **Checking loan amounts on NSLDS**

If a student at Ecclesia has FSA loans that were received at other schools, Ecclesia will check the National Student Loan Data System (NSLDS) website to make sure the student still has remaining eligibility under the aggregate loan limits.

As long as there is no conflicting information, the College will rely on the financial aid history (provided on the ISIR as well as the NSLDS Web site) and the Transfer Student Monitoring process to tell us if a student is about to exceed the aggregate Direct Loan limits.

### **Review of the Direct MPN Process**

1. Student Applies for Aid.
2. School Determines Eligibility and Loan Amount.
3. Certification/Origination.
4. Student completes MPN.
5. Disclosure & Entrance Counseling.
6. Disbursement to the Borrower.
7. Making Subsequent Loans.

### **Monitoring and Correcting Underpayments, Overpayments and Overawards.**

Ecclesia will review each Student Loan award prior to origination by having the Registrar's Office verify its submission spreadsheet for hours earned. This will ensure that the FA Office has awarded student loans correctly. The Registrar's Office will highlight the field yellow if any changes are made to hours earned to notify the FA Office that a change in award amounts may be necessary. Only then will the loan be originated. Any discrepancies after this point will be resolved by making upward or downward adjustments in COD and drawing down or returning funds, accordingly.

## Direct Loan Program – Exit Counseling

Ecclesia must ensure that exit counseling is conducted with each Federal Direct Subsidized Loan or Federal Direct Unsubsidized Loan student borrower or professional student Direct PLUS Loan borrower shortly before the student graduates or ceases at least half-time study at the school.

If a student borrower withdraws without the school's prior knowledge or fails to complete the exit counseling as required, exit counseling must be provided either through electronic means, by mailing written counseling materials to the student borrower at the borrower's last known address, or by sending written counseling materials to an email address provided by the borrower that is not associated with the school email address. The counseling must be provided within thirty days after the school learns that the student borrower has withdrawn from school or has failed to complete the exit counseling as required.

Counseling may be provided in person, by audiovisual presentation, or by interactive electronic means. Further, the school must maintain documentation substantiating the school's compliance with this section for each student borrower.

Ecclesia will use the option to provide exit counseling through the <http://nslds.ed.gov> website. It will validate the completion of exit counseling through COD.

A notice of the requirement to complete exit counseling will be sent in the following circumstances:

Graduated or are going to graduate,  
Changed of attendance to less than half-time,  
Withdrew from school or stopped attending,  
Transferred to another school, or,  
Took a leave of absence that was more than 180 days.

Several events will trigger this notification to be sent to student loan borrowers. They are as follows and may be individual or in combination:

- 1) Registrar's office notifies that student will be graduating,
- 2) Student withdraws from school or drops below half-time. This notification is automatically generated and sent to the Financial Aid Director via the Populi database system.
- 3) A student notifies the school of his or her intention to withdraw.
- 4) While performing Enrollment Reporting in NSLDS and it is discovered that a notification is required such as when Fall semester starts and students do not return from the previous Spring.
- 5) Anytime a transcript or diploma is requested and the student has not completed the exit counseling. Transcript and/or diplomas will not be approved for release until the requirements for exist counseling are met.

Ecclesia will use the option of notifying students via their non-school email by sending an email template with all the instructions to complete exit counseling.

## **General Provisions**

### **Academic Year**

For the purpose of awarding Federal Student Aid, the definition of an Academic Year at Ecclesia College is thirty credits and thirty weeks.

### **Annual Security Report Preparation, Publication, and Distribution Policy and Procedures**

Ecclesia will prepare an Annual Security Report and Annual Fire Safety Report in accordance with the Clery Act and all federal regulations from evidence provided by the EC Fire Log, the EC Crime Log, and the local authorities. Ecclesia will enter this data into the Campus Safety and Security website provided by the Department of Education to ensure accurate and complete information to current and prospective students, faculty, and staff.

By October 1 of each year, the College will distribute to all enrolled students and current employees its annual security report. This report is available on the EC website, <http://www.ecollege.edu/consumer-information>. The report can also be found at <http://ope.ed.gov/security/>.

By October 1 of each year, the College will distribute to all current employees and students a notice of the annual crime report that includes a statement of the report's availability, the exact address at which the report is posted, a brief description of the report's contents, and a statement that the College will provide a paper copy of the report upon request.

The College will provide a notice to prospective students and prospective employees that include a statement of the report's availability, a description of its contents, and an opportunity to request a copy. The College will provide its annual security report, upon request, to a prospective student or prospective employee. The student may request a paper copy of the report from [dpreston@ecollege.edu](mailto:dpreston@ecollege.edu) or [lnewlun@ecollege.edu](mailto:lnewlun@ecollege.edu).

The notice on the College's website will include the exact electronic address at which the report is posted, a brief description of the report, and a statement that the College will provide a paper copy of the report upon request.

Office Responsible: Campus Security Survey Administrator

## Electronic Reporting

### Policy and Procedure for Reporting

As an institution responsible for Title IV Programs, Ecclesia will establish and maintain financial records that are equivalently reflected in its accounting.

In order to ensure reporting is performed correctly so that student account ledgers and COD/NSLDS reflect the same information, EC will work with both the business office and its third party servicer. Although the Financial Aid Office will work in closed unison with its third party servicer who will ultimately input information into COD and the business office who will post awards, the Financial Aid Office will be ultimately responsible for ensuring all information is accurate.

The Financial Aid Office will notify the Business Office that a student is complete and ready to have disbursements made. This will be verified student by student to ensure the disbursement amounts and dates are synced with each award for the student. Any discrepancies will be resolved at this time.

Upon completion of disbursements, a spreadsheet with disbursement dates, academic year and loan period (if Direct Loan), and amounts will be submitted to the third-party servicer who will input data into COD to originate each award.

Ecclesia will double check the Loan period and Academic year start and end dates match the Semester/Term date published by the college.

The Third Party Servicer will provide a Funds Transfer report that can be verified by the Financial Aid Office to ensure the third party servicer and the school are in agreement. Only then will the school authorize a submission to be made.

This process will be sufficient to ensure each step has a verification process to find errors that may occur.

NSLDS reporting will be performed on a student by student basis within NSLDS enrollment reporting, so that it matches what the school's data base states in relationship to start and stop dates for any particular student. Each student enrolled will be reviewed no greater than every sixty days. Any changes in a student's enrollment status will be accurately reported.

## Second Baccalaureate Degree

Financial Aid for a Second Baccalaureate Degree is limited to the Federal Direct Loan Program. Eligibility is determined by filing the Free Application for Federal Student Aid (FAFSA). If the student is currently repaying prior loans, those loans may be eligible for an in-school deferment. The student should contact his/her lender for more information on deferments.

## Disbursement of Title IV Funds if and when EC is Notified that a Student is in Default

A person generally isn't eligible for FSA funds if they are in default on an FSA loan or he owes an overpayment on an FSA grant or loan and they have not made a repayment arrangement for the default or overpayment.

Any student applying for FSA funds must certify that they are not in default on any FSA loan and does not owe an overpayment on any FSA grant, or that they have made satisfactory arrangements to repay the overpayment or default. This certification statement is printed on the Free Application for Federal Student Aid (FAFSA).

### NSLDS match

To help Ecclesia identify students with problems such as defaulted loans or overpayments, the FPS matches the student's FAFSA information with their financial aid history in the NSLDS database. Ecclesia must resolve any conflicts between NSLDS and other information the school has about the student before disbursing Title IV aid (i.e., NSLDS showing a student isn't in default but the FA Office has documentation showing that they are in default.)

The results of the NSLDS match are provided on the SAR and ISIR on the NSLDS Financial Aid History page. As with other matches, a "C" next to the student's SAI indicates problems that must be resolved.

Ecclesia may use the NSLDS record to determine the student's eligibility. The College will not need to wait for the corrected data to be reported.

- **Student not in database.** If a match with NSLDS is completed but there's no information on the student in the database, then no financial aid history can be provided. The output document will have a comment explaining that the student's SSN is not associated with any financial aid history. The FA Office will assume that the student has no financial aid history unless it has conflicting information. If a loan history should exist, the College will help the student by contacting the lender (for FFEL) or the Direct Loan Servicing Center.
- **No relevant history.** If a student's SSN matches a record in the NSLDS database but there's no relevant financial aid history information to report, then no information will be on the output document. The SAR and ISIR will have a comment explaining that the student's record was matched with NSLDS, but no information was found to print on the NSLDS page.



**Post screening—changes after initial match**

Once the FA Office has received the financial aid history through NSLDS, we are not required to check for changes to the data before we disburse funds to the student. However, if the FA Office learns from NSLDS or another source that the student was not or is no longer eligible, the FA Office will not deliver or disburse any more FSA funds and will help make sure the student arranges to repay the aid for which they were not eligible.

NSLDS uses a post screening process to let the College know when there are significant changes (such as a defaulted loan or an overpayment) to a student's financial aid history. If post screening identifies changes that may affect the student's eligibility, the FPS will generate new output documents so that schools that are listed for receipt of the student's FAFSA information will automatically be notified. Items that have changed since the last transaction are marked on the output document with a “#” sign, and the reason code for the post screening will be given.

## Distance Ed Academic Refund Policies

The student must file a withdrawal form that can be found at the following web address:

<https://ecollegeforms.wufoo.com/forms/m1cmleuh17p5ebi/>

This must be filed with the Distance Ed Registrar to receive a tuition credit or refund. The refund will be calculated based on the date/time the student submits the withdrawal form. Students failing to properly withdraw from a course will not receive a tuition credit/refund. The withdrawal fee per course is \$25. This applies to administrative withdrawals, as well. All times are in the Central Time Zone. If the student is not sure what time it is in the Central Time Zone go to <https://time.gov/>.

**Refunds are issued according to the following schedule minus the nonrefundable application and matriculation fees.** (Students must receive official confirmation of course withdrawal from the EC Online office to be eligible to receive the appropriate refund noted below.)

- All Online Courses -100% refund through first 6% of a particular offering period (days are rounded up, when possible, to the benefit of the student)
- If the offering period is 8 weeks long, the student receives 100% refund for the first 3 days and 0% thereafter.
- If the offering period is 12 weeks long, the student receives 100% refund for the first 5 days and 0% thereafter.
- If the offering period is 16 weeks long, the student receives 100% refund for the first 7 days and 0% thereafter.
- There is a 0% refund after midnight on last “refundable” day of class.
- Three-Day Intensives 100% refund first half-day only
- Audits/Non-Credits Audited courses or non-credit courses cannot be dropped nor credit/refunds issued. Audited courses are not listed on transcripts.

## LOA Policy

As of August 29, 2019, Ecclesia will no longer have a Leave of Absence policy. Student seeking to leave the institution must use the withdrawal process.

## VA 38 USC 3679 (e)

In accordance with Title 38 US Code 3679(c), this educational institution adopts the following additional provisions for any students using U.S. Department of Veterans Affairs (VA) Post-9/11 G.I. Bill® (Ch.33) or Vocational Rehabilitation & Employment (Ch.31) benefits, while payment to the institution is pending from VA. This educational institution will not:

- Prevent the student's enrollment;
- Assess a late penalty fee to the student;
- Require the student to secure alternative or additional funding;
- Deny the student access to any resources (access to classes, libraries, or other institutional facilities) available to other students who have satisfied their tuition and fee bills to the institution.

However, to qualify for this provision, such students may be required to:

- Produce the VA Certification of Eligibility (COE) by the first day of class;
- Provide a written request to be certified;
- Provide additional information needed to properly certify the enrollment as described in other institutional policies

## Student "Consumer Information"

In the 1998 Higher Education Act amendments Congress requires that colleges provide students with a list of consumer disclosures. Here we give you a brief description of the disclosure information and how to obtain the complete disclosure information. If you need any further assistance after reading the various publications or after contacting the individual departments we ask that you contact the Financial Aid Office at 479-234-7236 ext. 209.

### **Ecclesia College Financial Aid Office Mission Statement**

The Mission of the Financial Aid Office is to assist students in obtaining financial aid for their college education while complying with all federal, state and institutional regulations, and by offering optimal customer service to students, parents, staff, and outside agencies.

Financial aid consists of funding provided through federal and state governments and institutional sources to help cover educational expenses. This funding consists of grants and scholarships that do not have to be paid back to the provider and loans that have a variety of repayment options.

### **Family Education Rights and Privacy Act (FERPA)**

Ecclesia College, as permitted by federal regulation {34 CFR 668.41}, electronically disseminates consumer information, including the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act information. Upon request, the institution will provide a free paper copy. Anyone signing or processing financial aid forms or seeking information or assistance at Ecclesia College must read, understand, and comply with the requirements disclosed, which are available 24 hours a day at <https://ecollege.edu/?s=consumer+information>

The Family Educational Rights and Privacy Act (FERPA) of 1974, as amended, sets forth requirements regarding the privacy of student records. FERPA governs the *release* of these records (known as education records) maintained by an educational institution, as well as the *access* to these records.

All students have the following rights:

- Right to and procedures for inspecting and reviewing a student's educational records
- Right to and procedures for requesting amendment of a student's education records
- Right to consent to disclosure of personally identifiable information contained in the student's education records
- Right to file a complaint with the U.S. Department of Education
- Right to obtain a copy of the student records policy

*Our student records policy is available in the Student Handbook. Copies are also available on the <https://ecollege.edu/consumer-info/>*

*and upon request in the Student Services Office or in the Financial Aid Office.*

### **Available Financial Assistance**

- Description of all available federal, state, and institutional financial need-based and non-need-based assistance programs, and for each program a description of:
  - Application form and procedures
  - Student eligibility requirements
  - Selection criteria
  - Criteria for determining the amount of a student's award
- Rights and responsibilities of students receiving Title IV and other financial aid, including:
  - Criteria for continued eligibility
  - Satisfactory academic progress standards and criteria to reestablish eligibility if student fails to maintain satisfactory academic progress
  - Method and frequency of financial aid disbursements
  - Terms of any loans received, sample loan repayment schedules and the necessity for repaying loans
  - General conditions and terms applicable to any employment offered as part of student's financial aid award
  - Exit counseling information required to be provided and to be collected from student borrowers of the FFEL Program

*This information is available in the Financial Aid Office, in the Financial Aid Handbook (some of the above information), and in the Direct Loan Master Promissory Note.*

### **Institutional Information**

- Cost of attending Ecclesia College
- Refund policies
- Requirements for officially withdrawing from school
- Summary of requirements for the return of Title IV loan assistance by withdrawn students
- Information regarding Ecclesia College's academic programs
- Entities that accredit, certify, or approve Ecclesia College and procedures for reviewing school's accreditation, certification or approval documentation.
- *Description of any special services and facilities for disabled students*
- Title and available employee(s) responsible for dissemination of institutional and financial disclosure information and how to contact them

*This information is available at [www.ecollege.edu](http://www.ecollege.edu), in the Financial Aid Office and in the following Ecclesia College publications:*

*EC Academic Catalog (some of the above information) Student Handbook (some of the above information)*

### **Completion/Graduation Rates**

- Completion or graduation rates of degree-seeking, full-time undergraduates who graduated or completed their program within 150% of the normal time for graduation or completion

*These rates are posted on Ecclesia's website, [www.ecollege.edu](http://www.ecollege.edu).*

### **Campus Security Information**

See "Annual Security Report Distribution Policy and Procedures"

Information is available on Ecclesia website, [www.ecollege.edu](http://www.ecollege.edu).

Ecclesia College complies with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act ("Clery Act"), as amended by the Violence Against Women Reauthorization Act of 2013 ("VAWA"); Arkansas; and all other applicable laws.

The Clery Act, as amended by VAWA, requires higher education institutions to annually report certain information concerning campus security policies and campus crime statistics. These policies and statistics are located in the most recent Ecclesia Annual Security Report, available on the Ecclesia College website at <https://ecollege.edu/consumer-info/> and in Populi. The report may also be found at the Department of Education's Campus Security and Safety website at <https://ope.ed.gov/campusafety>

### **Drug-related Convictions and Student Ineligibility**

34 CFR 668.40. Effective July 1, 2000: Students who have been convicted under federal or state law for possession or sale of a controlled substance will be suspended from Title IV [financial aid] eligibility, regardless of when the conviction occurred.

If a student is convicted of an offense involving the possession of an illegal substance, the ineligibility period is:

- First Offense = 1 year from date of conviction
- Second Offense = 2 years from date of conviction
- Third Offense = Indefinite period

If the student is convicted of an offense involving the sale of an illegal substance, the ineligibility period is:

- First Offense = 2 years from date of conviction
- Second Offense = Indefinite period

A student may regain eligibility by successfully completing a drug rehabilitation program that complies with criteria established by the U.S. Department of Education.

A qualified drug rehabilitation program must include at least two unannounced drug tests and must satisfy at least one of the following requirements:

- Be qualified to receive funds directly or indirectly from a federal, state, or local government program.
- Be qualified to receive payment directly or indirectly from a federally or state-licensed insurance company.

- Be administered or recognized by a federal, state, or local government agency or court.
- Be administered or recognized by a federally or state-licensed hospital, health clinic, or medical doctor.

The period of ineligibility begins as of the date of the conviction. A conviction is defined as a conviction that is on a student's record at the time the student's eligibility is being determined. A conviction that was reversed, set aside, or removed from the student's record is not relevant.

An illegal drug is a controlled substance as defined by section 102(6) of the Controlled Substances Act [21 U.S.C. 801(6)] and does not include alcohol or tobacco. Students may obtain additional information on eligibility by contacting the U.S. Department of Education at 1-800-433-3243 or go to <http://www.fafsa.ed.gov>.

### **Drug and Alcohol Abuse Prevention Program Policy and Procedure**

The Drug-Free Schools and Community ACT and Part 86 of the Department of Education's General Administrative Regulations require each institution of higher education (IHE) such as Ecclesia College to certify that it has developed and implemented a drug and alcohol abuse prevention program (DAAPP). Ecclesia College's program is designed to prevent the unlawful possession, use and distribution of illicit drugs and alcohol abuse on campus and at recognized events and activities.

Ecclesia College will provide on an annual basis to all current students and all current employees:

- A written statement about its standards of conduct that clearly prohibit the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees on its property or as part of its activities;
- A written description of the applicable legal sanctions under local, state, or federal law for the unlawful possession or distribution of illicit drugs and alcohol;
- A description of the health risk associated with the use of illicit drugs and the abuse of alcohol;
- A description of any drug or alcohol counseling, treatment, or rehabilitation or re-entry programs that are available to employees or students; and
- A clear statement that the institution will impose strict disciplinary sanctions on students and employees (consistent with federal, state, and local laws and ordinances) and a description of those sanctions, up to and including expulsion or termination of employment and referral to prosecution, for violations of the standard of conduct. For the purpose of this section, please note that a disciplinary sanction may include the required completion of an appropriate treatment program.

This policy will be completed by the Dean of Students who oversees the Drug and Alcohol Abuse Prevention Program of Ecclesia College on a yearly basis.

This policy will be distributed to all current students and employees via email and it will be

posted in the *Files for Everyone* section of the Populi Data Base. It will also be made available in written form upon request to the Dean of Students' Office.

Ecclesia College will also conduct a biennial review to measure the effectiveness of its DAAPP to ensure consistent treatment in the enforcement of applicable drug and alcohol-related statutes, ordinances, and institutional policies against students and employees found to be in violation. Ecclesia College will prepare a report and supporting documents and make them available upon request to the Department of Education. This biennial review will be conducted in even number years by October 1<sup>st</sup> and kept in the Dean of Students Office.

### **Loan Code of Conduct**

Ecclesia College does not participate in any revenue-sharing arrangements with any private lender.

Ecclesia College does not permit any officer, employee or agent of the school who is employed in the financial aid office or is otherwise involved in the administration of education loans to accept any gifts of greater than a nominal value from any lender or servicer.

Ecclesia College does not permit any officer, employee or agent of the school who is employed in the financial aid office or is otherwise involved in the administration of education loans to accept any fee, payment, or other financial benefit (including a stock purchase option) from a lender or affiliate of a lender as compensation for any type of consulting arrangement or contract to provide services to a lender or on behalf of a lender relating education loans.

Ecclesia College does not permit any officer, employee or agent of the school who is employed in the financial aid office or is otherwise involved in the administration of education loans to accept anything of value from a lender, guarantor, or group of lenders and/or guarantors in exchange for service on an advisory board, commission or other group established by such a lender, guarantor group of lenders and/or guarantors. Ecclesia College does allow for the reasonable reimbursement of expenses associated with participation in such boards, commissions or groups by lenders or groups of lenders.

Ecclesia College does not assign private lenders to any first-time borrower through financial aid packaging or any other means.

Ecclesia College recognizes that a borrower has the right to choose any private lender from which to borrow to finance his/her education. Ecclesia College will not refuse to certify or otherwise deny or delay certification of a loan based on the borrower's selection of a private lender.

Ecclesia College will not request or accept any offer of funds to be used for private education loans to students from any lender in exchange for providing the lender with a specified number or volume of Title IV loans, or a preferred lender arrangement for Title IV loans.

Ecclesia College will not request or accept any assistance with call center or financial aid office staffing.



### **Lending Statement Regarding Preferred Lender Lists and Preferred Lender Arrangements**

Ecclesia College does not recommend specific student loan lenders, nor does it have a preferred lender list or preferred lender arrangement. Students may borrow from any lender that offers educational student loans. Ecclesia College encourages students to borrow only what is absolutely needed to prevent future debt.

### **Equity in Athletics Data Analysis (EADA)**

The Equity in Athletics Disclosure Act requires that a school that has an intercollegiate athletic program to make prospective students aware of its commitment to providing equitable athletic opportunities for its male and female students. As such Ecclesia College publishes its report to the following website: <https://ope.ed.gov/athletics>.

This report is also available on the college's website at <https://ecollege.edu/consumer-info>.

## Administration of FSEOG

### FSEOG

To receive a Federal Supplemental Educational Opportunity Grant (FSEOG), a student must meet the general eligibility requirements. An eligible undergraduate at Ecclesia College must have financial need, and students with the lowest SAIs who will also receive Pell grants for the award year have primary consideration for FSEOG money.

The undergraduate student is defined under the FSEOG Program as a student who is enrolled in an undergraduate course of study at an institution of higher education and who:

- has not earned a bachelor's degree or first professional degree; and
- is in an undergraduate course of study that usually does not exceed four academic years or is enrolled in a four- to five-academic-year program designed to lead to a first degree.

Ecclesia College makes FSEOG funds reasonably available (to the extent that funds remain) to all eligible students.

### Awarding FSEOG

#### *Award Amounts*

The maximum Federal Supplemental Educational Opportunity Grant (FSEOG) for a full academic year is usually \$4,000. The minimum FSEOG amount is \$100, but Ecclesia may prorate this amount if the student is enrolled for less than an academic year or enrolled less than full-time.

The FSEOG maximum award for a student applies to both the Federal share and the required non-federal share.

#### *Selecting FSEOG Recipients*

When awarding FSEOG funds for an award year, Ecclesia first selects students with the SAIs who will also receive Pell Grants in that award year. This group is known as the FSEOG first selection group. If Ecclesia has remaining FSEOG funds after making awards to all Pell Grant recipients for that award year, the Ecclesia College will next select students with the lowest SAIs who are not receiving Pell Grants. This group of students is known as the FSEOG second selection group.

A student who will also receive a Pell Grant in that award year is a student who has demonstrated Pell Grant eligibility for the same award year based upon an SAI that Ecclesia has calculated for the student, or the SAI on the student's SAR or ISIR.

The FA Office will keep documentation of the eligible SAI that was calculated for the student, and the FA Office will confirm Pell Grant eligibility prior to disbursement of the FSEOG. If the FSEOG recipient does not actually receive a Pell Grant during the award year, but the documentation shows that the FSEOG award and disbursement was made in good faith, the

College is not required to recover the FSEOG funds. If the student loses Pell Grant eligibility prior to disbursement of the FSEOG, the College will cancel the FSEOG award.

### ***Establishing categories of students***

The College's selection procedures specify categories of students to ensure that the students in each category have an opportunity to be awarded FSEOG funds.

Categories:

1. Students beginning the year in the Fall semester will receive approximately 85% of available funds.
2. Students beginning the year in the Spring semester will receive approximately 15% of available funds.

The College's written selection procedures ensure that FSEOG recipients are selected on the basis of the lowest SAIs and Pell Grant priority requirements over the entire award year.

Within each category, Ecclesia first awards the assigned FSEOG funds to students with the lowest SAIs who will also receive a Pell Grant. If FSEOG funds assigned for that category still remain, Ecclesia College will next award FSEOG funds to students in the category with the lowest SAIs who will not receive a Pell Grant.

### ***Frequency & amount of FSEOG disbursements***

The College awards FSEOG for a full academic year, so a portion of the grant is paid during each payment period. The total FSEOG award is divided between the Fall and Spring semesters.

However, Ecclesia College may pay an FSEOG in unequal amounts if the student has costs or resources that are different for different payment periods. The College may make payments within a payment period in whatever installments will best meet the student's needs.

### **FSEOG Method of Matching Federal Share**

The non-federal share (25%) of FSEOG awards are made from the College's own resources. The College provides the eligible student with an institutional grant: EC SEOG Match. (Currently, Ecclesia College has a waiver from the Department of Education not to provide the 25% match).

## Administrative Capability

### Disbursements and Financial Statements

The College's institutional records must demonstrate proper administration of FSA program funds and show a clear audit trail for FSA program expenditures. Ecclesia College keeps records of student accounts for each enrollment period which include:

- The amount and date of institutional charges;
- The amount and date of each Title IV, HEA disbursement;
- The amount and date of other payments made to a student's account, including cash payments, scholarships, etc.;
- The payment of credit balance funds and living expense stipends by date, amount, and check number.

### Means and methods used to ensure compliance with FSA regulations:

Each student account will record each student's institutional charges, cash payments, FSA payments, cash disbursements, refunds, returns and overpayments for each enrollment period. The College will maintain records required under the individual Title IV HEA program regulations. The Populi student account ledger is the official ledger card for each student.

### Reconciliation

Reconciliation is the process by which a school reviews and compares Title IV aid (grants, loans, and campus-based aid) recorded on the Department of Education's systems (COD/G5) with the information in the Ecclesia's internal records. Ecclesia will reconcile both internally (between Business Office and Financial Aid Office data) and externally (between school data and the COD System/G5). Through reconciliation, disbursement and cash discrepancies are identified and resolved in a timely manner to ensure the school meets all regulatory requirements. Ecclesia will document its reconciliation efforts and retain this documentation for auditing purposes.

If Ecclesia is meeting all disbursement/adjustment reporting, excess cash, and reconciliation requirements, a final reconciliation should begin no later than the last award or payment period end date at the school for a given program and year. Ecclesia should be able to reconcile to a zero cash balance soon after its final disbursements and should not carry a cash balance (positive or negative) for an extended period. Note: Ecclesia must reconcile to both zero Ending Cash Balance and zero Total Net Unbooked for Direct Loan and to zero Cash > Net Accepted & Posted Disbursements for Pell Grant.

Ecclesia will then officially confirm closeout via the School Balance Confirmation page on the COD Web Site for Direct Loan and Pell Grant. Balance confirmation will allow Ecclesia to receive a Program Year Closeout Letter to document completion of final reconciliation. It will also allow for tighter controls over available funding and data submission so that the school can then focus on processing and reconciliation in more current award years.

Responsibilities for reconciliation will be as follows even though the ultimate responsibility is Ecclesia College's:

## Educational Compliance Management

- Request cash from appropriate award year and program using G5 system.
- Request cash based on schools submitted input documents that result of FEDD produced Funds Transfer List and according ECM's weekly Schedule of Disbursement.
- Review Ecclesia funding information on COD to ensure authorized amounts match Funds Transfer Lists
- Continually reconcile COD and G5 on a weekly, monthly and annual basis.
- Review monthly Pell and Direct Loan SAS Reports to confirm reconciliation of COD to G5.
- Produce Finalized Funds Transfer Notification for each transfer and YTD Funds Transfer Summary Report.
- Complete drawdown requests for FSEOG and FWS as needed for Campus-Based clients.
- Return funds for recoveries and submit downward adjustments.
- Provide client institutions with monthly report of ECM reconciled COD/G5 records.
- Provide client institutions with Pell and Direct Loan monthly and year-to-date SAS reports.
- Run G5 reports as requested by clients for audits and program reviews.
- Request year-to-date reports from COD, as needed for reconciliation.
- Confirm FINAL balances to close Pell and Direct Loan Award Years.

## Ecclesia College

- Ecclesia is responsible to review and approve students for origination and disbursement based on all eligibility criteria.
- Create and transmit Input Sheets in Client Remote system and submit to ECM for Origination and Disbursement, as well as cash requests.
- Transfer cash received, from the institution's Federal accounts to the institution's General Operating account.
- Disburse Title IV funds to the individual students' accounts (Ledger Cards) for whom the funds are intended.
- Reconcile Federal bank accounts on a monthly basis.
- Maintain a system of accounting for Title IV authorizations, draw-downs and recoveries (i.e., returns, refunds).
- Reconcile on at least a monthly basis, its internal system of ledgers and journals (i.e., accounting system), including student ledgers, to ECM records (i.e., Final Funds Transfer Notifications and YTD Funds Transfer Summary Report, annually).

The Federal Funds account will be reconciled monthly when bank statements are received.

All money from the Federal Funds account is applied to students' accounts. Monthly in-house

reconciliation of the Federal Funds bank statement provides a check that all monies are accounted for.

### **Fiscal Records**

The College accounts for the receipt and expenditure of Title IV, HEA program funds in accordance with generally accepted accounting principles.

### **Credit Balance**

When Ecclesia disburse Title IV, HEA program funds by crediting a student's account and the total amount of all Title IV, HEA funds exceeds the amount of tuition and fees, room and board, and other authorized charges assessed, Ecclesia will pay the resulting credit balance to the parent or student no later than 14 days after the balance occurred if the balance occurs after the first day of class of the payment period. While Ecclesia is on HCM2 status, Ecclesia will not hold credit balances for students.

### **Authorization to Credit FSA Funds to Students Accounts**

An institution must obtain authorization for the student or parent borrower before it can 1) Use Title IV funds to pay for allowable educationally related expenses other than tuition, fees, room and board; 2) Credit FWS wages to a student's account to pay for any educational charges; or, 3) Hold Title IV credit balances that would otherwise be paid directly to student or parent.

Ecclesia does not provide the option to use Title IV funds for educational related expenses other than tuition, fees, room and board. If Ecclesia changes the current policy, it will require students or parent borrower to authorize Ecclesia to use these funds for expenses other than tuition, fees, room and board.

Ecclesia will require students to authorize the school to credit FWS wages to a student's account to pay for educationally related expenses before the school will do so. Ecclesia will not coerce or require a student or parent to provide this authorization. This authorization will be kept in the business office and can be canceled or modified at any time. It will become part of the student's Financial Agreement.

Ecclesia while on HCM2 status will not hold credit balances for students as it will pay within 14 days of Title IV disbursements the credit balances to the student or parent borrower. When Ecclesia is removed from HCM2 Status and if it agrees to hold credit balance, it will ensure that the amount of funds are identified for each student or parent in a subsidiary ledger account; maintain at all times in its depository account at least the amount of funds Ecclesia is holding on the behalf of the students or parents; and, pay any remaining balance on loan funds by the end of the loan period and any remaining Title IV funds by the end of the last payment period in the award year. This authorization to hold credit balances can be canceled or modified at any time

and credit balance will be paid to the student or parent borrower with 14 days of notification to cancel or modify authorization.

## Disbursing Title IV Funds

How Title IV Funds are disbursed.

Procedures to ensure disbursement of Title IV funds by payment period and method used for payment of a student's account

1. Student agrees to FA Award Letter by accepting awards or some part, thereof.
2. FA Office electronically notifies Business Office through Populi the awards for the student.
3. Funds are applied to student account with notification of source (Pell, FSEOG, loan, etc.)

Procedures for disbursing credit balances

1. As awards / payments are entered in the Business Office, a credit balance will become apparent.
2. The Business Office disburses credit balance within 3 business days.
3. Disbursement is made by check to the student's campus mail box or mailed to last known address if student is no longer active.

Procedures for early and late disbursements

1. Ecclesia does not practice early disbursement of funds.
2. See the "Return of Title IV" funds for the process for late disbursements.



## **Return of Title IV Funds (R2T4) Policy FA Office of Ecclesia College**

The Return of Title IV funds is administered by Financial Aid Office of Ecclesia College. This policy applies to students who withdraw (official, unofficially) or are dismissed from enrollment at Ecclesia College. It is separate and distinct from the Ecclesia College Refund Policy (see Refunds section under Student Expenses in the College General Catalog). Therefore, the student may still owe funds to the school to cover unpaid institutional charges. The school may also attempt to collect from the student any Title IV program funds that the school was required to return. The calculated amount of the "Return of Title IV Funds" that is required for students affected by this policy are determined according to the following definitions and procedures, as prescribed by regulation:

The Institution has 45 days from the date the institution determines that the student withdrew to return all unearned funds for which it is responsible. The school is required to notify the student if they owe a repayment via written notice.

The school must advise the student or parent that they have 14 calendar days from the date the school sent the notification to accept a post-withdrawal disbursement. If a response is not received from the student or parent within the permitted time frame or the student declines the funds, the school will return any earned funds that the school is holding to the Title IV programs. Post-withdrawal disbursement must occur within 120 days of the date the student withdrew.

The Return of Title IV Funds (R2T4) regulation does not dictate the institutional refund policy, however. The calculation of Title IV funds earned by the student has no relationship to the student's incurred institutional charges.

Title IV funds are awarded to a student under the assumption that he/she will attend school for the entire period for which the assistance is awarded. When a student withdraws from all his/her courses, for any reason including medical withdrawals, he/she may no longer be eligible for the full amount of Title IV funds that he/she was originally scheduled to receive.

The school is required to determine the earned and unearned Title IV aid a student has earned as of the date the student ceased attendance based on the amount of time the student was scheduled to be in attendance.

If the student withdraws from all his courses prior to completing over 60% of a semester, they may be required to repay a portion of the federal financial aid that they received for that term. A pro rata schedule is used to determine the amount of federal student aid funds they will have earned at the time of the withdrawal. Federal aid includes Federal Direct Loan (subsidized and unsubsidized), Parent Plus Loan, Pell Grants, SEOG Grants, ACG, and any other Title IV funds.

The return of funds is based upon the concept that students earn their financial aid in proportion to the amount of time in which they are enrolled. Under this reasoning, a student who withdraws in the second week of classes has earned less of his/her financial aid than a student who withdraws in the seventh week. Once 60% of the semester is completed, a student is considered to have earned all of his financial aid and will not be required to return any funds.

**Withdrawal before 60%:** The Ecclesia College FA Office must perform a R2T4 to determine the amount of earned aid up through the 60% point in each payment period. Ecclesia College will use the Department of Education's prorate schedule to determine the amount of R2T4 funds the student has earned at the time of withdrawal. After the 60% point in the payment period or period of enrollment, a student has earned 100% of the Title IV funds he or she was scheduled to receive during the period. The institution must still perform a R2T4 to determine the amount of aid that the student has earned.

**Withdrawal after 60%:** For a student who withdraws after the 60% point-in-time, there are no unearned funds. However, Ecclesia College will still determine whether the student is eligible for a post- withdrawal disbursement.

**Withdrawals:** As in institution that is required to take attendance, a student's official withdrawal date is determined by using one of the following:

- The date he/she attended their last class. Proof of this will be submitted to perform the Financial Aid Office so that it may accurately perform the R2T4.
- For distance learning classes, the last date of attendance is the last day an academically related activity is completed.
- The Registrar will collect class attendance records for the student and determine the last day off attendance so that it may provide that proof to the Financial Aid office.

The FA Office determines the return of Title IV funds percentage. Institutions are required to determine the percentage of Title IV aid "earned" by the student and to return the unearned portion to the appropriate aid program.

### **The return of Title IV funds policy follows these steps:**

#### **Step 1: Student's Title IV information**

The FA Office will determine:

A) The total amount of Title IV aid disbursed (Not aid that could have been disbursed) for the semester in which the student withdrew. A student's Title IV aid is counted as aid disbursed in the calculation if it has been applied to the student's account on or before the date the student withdrew.

B) The total amount of Title IV aid disbursed plus the Title IV aid that could have been disbursed for the semester in which the student withdrew.

**Step 2: Percentage of Title IV Aid Earned:**

The FA Office will calculate the percentage of Title IV aid earned as follows: The number of calendar days completed by the student divided by the total number of calendar days in the semester in which the student withdrew.

The total number of calendar day in a semester shall exclude any scheduled breaks of more than five days.

$$\text{Days Attended} \div \text{Days in Enrollment Period} = \text{Percentage Completed}$$

**If the calculated percentage exceeds 60%, then the student has “earned” all the Title IV aid for the enrollment period.**

**Step 3: Amount of Title IV Aid Earned by the Student**

The FA Office will calculate the amount of Title IV Aid earned as follows:

The percentage of title IV aid earned (Step 2) multiplied by the total amount of Title IV aid disbursed or that could have been disbursed for the term in which the student withdrew (Step 1-B).

$$\text{Total Aid Disbursed} \times \text{Percentage Completed} = \text{Earned Aid}$$

**Step 4: Amount of Title IV Aid to be Disbursed or Returned:**

If the aid already disbursed equals the earned aid, no further action is required.

If the aid already disbursed is greater than the earned aid, the difference must be returned to the appropriate Title IV aid program.

$$\text{Total Disbursed Aid} - \text{Earned Aid} = \text{Unearned Aid to be Returned}$$

If the aid already disbursed is less than the earned aid, the Financial Aid Office will calculate a Post- Withdrawal Disbursement.

**Earned AID:**

Title IV aid is earned in a prorated manner on a per diem basis (calendar days or clock hours) up to the 60% point in the semester. Title IV aid is viewed as 100% earned after that point in time. A copy of the worksheet used for this calculation can be requested from the financial aid director. In accordance with federal regulations, when Title IV financial aid is involved, the calculated amount of the R2T4 Funds is allocated in the following order:

**Return of the Title IV Aid, based on the type of aid disbursed, in the following order:**

1. Unsubsidized Federal Direct Loan
2. Subsidized Federal Direct Loan
3. Federal Plus Loan received on behalf of the student
4. Pell Grant
5. SEOG Program Aid

## 6. Other Title IV Aid

Loans must be repaid by the loan borrower (student/parent) as outlined in the terms of the borrower's promissory note. The student's grace period for loan repayments for Federal Unsubsidized and Subsidized Direct Loans will begin on the day of the withdrawal from the College. The student should contact the lender if he/she has questions regarding their grace period or repayment status.

### **Institutional and student responsibility in regard to the Federal Return of Title IV Funds policy**

A. The FA Office's responsibilities in regard to the Return of Title IV funds policy include:

1. Providing each student with the information given in this policy;
2. Identifying students affected by this policy and completing the Return of Title IV Funds calculation;
3. Informing the student of the result of the Return of title IV Funds calculation and any balance owed to the College as a result of a required return of funds;
4. In a timely manner, returning any unearned Title IV aid that is due to the Title IV programs and, if applicable, notifying the borrower's holder of federal loan funds of the student's withdrawal date;
  - a. Within 7 days of determining that a student withdrew, the Registrar's Office is to make communication with the FA Office
  - b. Within 30 days of determining that a student withdrew, the FA Office is to submit R2T4 calculations to the Business Office
  - c. The College has 45 days from the date the institution determines that the student withdrew to return all unearned funds for which it is responsible.
5. Notifying student and /or Plus borrower of eligibility for a Post-Withdraw Disbursement, if applicable.

B. The **student's responsibilities** in regard to the Return of Title IV Funds policy include:

1. Becoming familiar with the Return of Title IV Funds policy and how withdrawing from all his courses effects eligibility for Title IV aid.
2. Resolving any outstanding balance owed to Ecclesia College resulting from a required return of unearned Title IV aid.

### **Post-Withdrawal Disbursements**

In the event a student is eligible for a post-withdrawal disbursement based on the student's budget, awarded financial aid and Title IV funds and R2T4 calculations, a post-withdrawal

disbursement must be made only after the following conditions are met.

1. Student and parents have been verbally notified (when possible) of the availability of post- withdrawal disbursements by the FA Office within one week from the date of R2T4 calculation was performed.
2. Student and parents have verbally notified (when possible) the FA office within a reasonable time indicating their acceptance of available post-withdrawal disbursement amounts. The reasonable time refers to allowing sufficient time to school to process a post-withdrawal disbursement within the deadlines set by the Department of Education.
3. Student has outstanding institutional charges that are due and wants to pay off those charges by applying his/her post-withdrawal disbursement.
4. Student/Parents completed all necessary paperwork related to such post-withdrawal disbursement within a reasonable time.
5. Student Financial Services must track the notification and authorization to make the disbursement and meet deadlines as prescribed by ED. A school must process Title IV aid within 120 days from the last day of the enrollment period.

The post-withdrawal disbursement must be applied to outstanding institutional charges before being paid directly to the student.

Note: The procedures and policies listed above are subject to change without advance notice.

## Satisfactory Academic Progress (see EC Academic catalog)

EC's Financial Aid Satisfactory Academic Progress Policy has been designed to strengthen and reinforce the relationship that should exist between financial aid and successful academic participation.

Federal regulations require that schools establish satisfactory academic progress standards for students applying for and receiving federal aid. These regulations require that the Financial Aid Office review all periods of a student's enrollment history regardless of whether financial aid was received, to determine if a student is making satisfactory academic progress toward an educational goal. A student's progress will be evaluated at the end of the fall and spring semesters by the standards outlined below. All periods of enrollment will be evaluated regardless of whether or not financial aid was received. Any academic transcripts received by the Financial Aid Office from other colleges will be evaluated using the same Satisfactory Progress Policy as outlined below.

These standards apply to all students who apply for and receive financial aid from the following programs:

- Federal Pell Grant
- Federal Work Study
- Federal Direct Loan Program
- Federal Supplemental Educational Opportunity Grant

### Educational Objective

Students receiving financial aid at EC must be enrolled in a course of study leading to an associate or bachelor degree.

In order to satisfy Satisfactory Academic Progress (SAP) requirements, financial aid recipients must:

1. Earn a minimum grade point average (GPA) of 2.00 for all classes attempted during the semester and have a minimum 2.00 cumulative GPA at the end of the second academic year.

**Grade Point Average:** Grade symbols of A, B, C, D, or Pass earned during the semester will be considered as acceptable for courses completed and Satisfactory Academic Progress consideration. "Pass" grades will be assigned the equivalent value of a 2.00 GPA. Courses completed with an F, I, W or AW will not be considered acceptable for Satisfactory Academic Progress. Courses completed with a WM (withdrawal for military leave) are excluded from the determination. Even though a "D" is considered a passing grade, the total GPA must not fall below 2.00 for each semester.

**Incompletes:** Incompletes will not be considered acceptable for Satisfactory Academic Progress. An incomplete course counts as credits attempted, but is not included in the GPA and credits completed until the incomplete grade changes to a passing or failing grade. Conversion of an “I” to an “F” is then included in the GPA for the semester.

**Withdrawals:** Withdrawals will not be considered acceptable for Satisfactory Academic Progress. If the student withdraws from a course or courses (W grade) after the first week of classes during a given term, the credits are included in the count of courses attempted. A “W” is not included in the GPA.

**Repeated Courses:** When a student repeats a course, the total attempted hours will increase with each repeat, but the student will only earn hours for a completed course once.

**Noncredit Remedial Courses:** These credits are not computed in the semester’s GPA. Remedial classes successfully completed count toward Satisfactory Academic Progress. They do not count toward graduation nor do they count in the determination of grade level for student loans. Students are limited to the equivalent of one (1) year, or 32 credit hours of approved remedial classes that can be funded by federal financial aid.

**Transfer Credit:** All credits accepted for transfer students are included in the total attempted credits for SAP determination as completed hours. Transfer accepted hours do not equate to degree specific hours. The enrollment at prior institution(s) is pro-rated by counting every sixteen credits or part thereof transferred in as one semester. That total number of semesters will be subtracted from the twelve-semester maximum time frame. The number remaining is the number of semesters a student can receive financial aid at Ecclesia College. Transfer hours do not affect cumulative GPA of credits taken at Ecclesia College.

## 2. Maximum Time Length

Federal regulations require that institutions establish a maximum time period or unit total for a student to complete an educational objective if financial aid is received. Financial aid recipients will be considered to be making Satisfactory Academic Progress if they complete their educational objective within the timetable indicated below. The educational objective as indicated on the Financial Aid Application will be used for this determination.

**Associate Degree:** This requires a completion of a minimum of 60 credits at EC. Students must complete their educational objectives within three years and are allowed up to time and a half the number of credit hours required in their degree.

**Bachelor Degree:** This requires a completion of a minimum of 120 credits at EC. Students must complete their educational objectives within six years and are allowed up to time and a half the number of credit hours required in their degree.

3. A minimum Number of Units (credit hours) to be completed each semester.

#### **Enrollment Status Credits Completion Requirements**

<b>Enrollment Status</b>	<b>Cumulative GPA</b>	<b>Minimum number of credit hours earned each semester</b>	<b>Evaluation Period</b>
Full-time	2.0	9	Semester
¾ - time	2.0	6	Semester
½ - time	2.0	3	Semester
Less than ½ - time	2.0	2	Semester

The College will calculate the pace at which the student is progressing by dividing the cumulative hours the student has successfully completed by the cumulative number of hours the student has attempted. In making this calculation, remedial courses may or may not be included.

#### **Academic and Financial Aid Warning/Probation**

The Academic Office will evaluate academic progress each semester. Each semester-end evaluation will include a GPA review as well as an assessment of progress made toward completion of the semester minimum unit expectation. Student placed on Academic Warning or Academic Probation will be notified in writing by the Academic office and if applicable by the Financial Aid Office.

The Financial Aid Office will evaluate each financial aid recipient's academic progress each semester. Each semester-end evaluation will include a GPA review as well as an assessment of progress made toward completion of the semester minimum unit expectation. Students placed on Financial Aid Warning or Financial Aid Academic Probation or disqualified from financial assistance will be notified in writing.

#### **Academic and Financial Aid Warning**

Students will be placed on Academic Warning if they fail to complete their credit hours expectation as defined by enrollment status or if they earn less than a 2.0 GPA for all courses attempted each semester. Financial assistance will be continued during this Academic Warning semester.

If at the end of the warning semester a student completes the credit hour expectation as defined by enrollment status with a minimum GPA of 2.0, they will be removed from warning status. Students not completing sufficient credits to meet the projected annual minimum credit expectation requirement during the warning semester will be placed on Academic Probation subject to disqualification from financial assistance.



Federal financial aid recipients will be disqualified from financial assistance if, for two consecutive enrolled semesters, they fail to complete the minimum semester credit expectations as defined by enrollment status or if they earn less than a 2.0 GPA for all courses attempted each semester.

### **Academic and Financial Aid Probation**

If the student continues enrollment on Academic Probation, the college will determine that the student should be able to meet SAP standards by the end of the term or the College will develop an academic plan for the student which, if followed, will ensure that the student is able to meet the College's SAP standards by a specific point in time.

### **Reinstatement**

A student who was previously disqualified may have their financial aid reinstated if they meet the enrollment status credit completion requirements listed above or the requirements specified by the College's academic plan for the individual student. The student should complete the same credit expectation in the reinstatement semester as the semester he or she was disqualified for aid. To be reinstated, the student must submit to the Financial Aid Office a copy of all grades showing courses completed along with a written request.

### **Appeals**

A student appeal may be filed for not meeting the GPA standard or the credit hour expectation. Students may also appeal if they have reached the maximum time frame. Appeals may be filed for the following mitigating circumstances: Medical problems; family emergency; other documented extenuating circumstances.

An appeal form can be obtained from the Financial Aid Office. The student is responsible for presenting sufficient information and documentation to substantiate the existence of mitigating circumstances and express what has changed in the student's situation that will allow the student to demonstrate SAP at the next evaluation. The Financial Aid Appeal Committee will initially review the appeal. If the student wishes to appeal the decision, he/she may make a written request to have a hearing before the EC Honor Council. The decision of the EC Honor Council is final.

If an appeal is denied by the College, please see the Reinstatement note above that describes how the student may reestablish his or her eligibility for Title IV, HEA program funds.

If an appeal is granted, the College will determine that the student should be able to meet SAP standards by the end of the term or the College will develop an academic plan for the student that, if followed, will ensure the student is able to meet the College's SAP standards by a specific point in time. A student on Academic/Financial Aid probation may not receive federal financial aid in subsequent terms unless the student makes SAP or meets the requirements specified in the student's academic plan.

## VERIFICATION POLICIES AND PROCEDURES

An institution must establish procedures to request, receive, and verify applicant data for each award year. Supporting documentation collected from the student (and parent or spouse) is compared to the information reported on the student's Institutional Student Information Record (ISIR). Institutions are responsible for resolving conflicting information related to a student's application for federal student aid.

Verification documents collected must be retained in the student's file as evidence that the process was completed.

If Ecclesia has no reason to question the accuracy of the information on the FAFSA, prior to completing verification an institution may:

- Make one disbursement of Pell, Perkins, and FSEOG funds for the applicant's first payment period;
- Permit FWS employment for the first 60 consecutive days after the student enrolls for the award year; or
- Originate, but not disburse a Direct Subsidized Loan.

Note: While it is permissible for Ecclesia to make the previous noted disbursements, Ecclesia will not disburse any Title IV funds until verification is complete.

Additionally, if an applicant's FAFSA information changes as a result of verification an institution must:

- Recalculate the applicant's Federal Pell Grant on the basis of the expected family contribution (SAI) on the corrected valid ISIR; or,
- Submit to the Secretary and changes to a non-dollar item of \$25 or more for any subsidized financial assistance program.

In compliance with CFR668, Subpart E, Ecclesia College will verify that the data reported on the Free Application for Federal Student Aid (FAFSA) is accurate by obtaining documentation to support the financial data reported on the FAFSA. Ecclesia will resolve all conflicting information prior to disbursing aid.

The college will verify all of the students selected for verification by the U.S. Department of Education and those students selected for verification under the institution's verification selection criteria. It will then submit each file to Ecclesia's Third Party Servicer, ECM, to be reviewed. Any suggestion made by ECM will be corrected.

ECM will assist Ecclesia each year by providing Ecclesia the most recent verification requirements and documents necessary to accurately complete the verification process as these are subject to change each year.

## Verification Criteria 2023-2024

### V1 Standard Verification Group

#### Tax Filers

- Adjusted Gross Income
- U.S. Income Taxes Paid
- Untaxed Portions of IRA Distributions and Pensions
- Tax Exempt Interest Income
- Education Tax Credits

#### Nontax Filers

- Income Earned from Work

#### Tax Filers and NonTax Filers

- Number of Household Members

### V4 Custom Verification Group

- High School Completion Status
- Identity/Statement of Educational Purpose

### V5 Aggregate Verification Group

#### Tax Filers

- Adjusted Gross Income
- U.S. Income Taxes Paid
- Untaxed Portions of IRA Distributions and Pensions
- Tax Exempt Interest Income
- Education Tax Credits

#### Nontax Filers

- Income Earned from Work

#### Tax Filers and NonTax Filers

- Number of Household Members
- High School Completion Status
- Identity/Statement of Educational Purpose

**ADDITIONAL INFORMATION CRITERIA:** The College reserves the right to require students to submit additional information if the following conditions exist:

1. Students who are only independent because they indicate on the FAFSA that they have a dependent that they support but have zero income. 2. Students and/or parents of dependent students who report zero or very little income. 3. Students and/or parents who indicate they did not file a federal tax return but are required to file based on the Internal Revenue Service's tax filing requirements. 4. Married students and/or parents who have filed as head of household. 5. All ISIRS that are flagged for discrepant information. 6. Documentation submitted that is conflict with the data on the FAFSA or reveals income that should have been reported on the

FAFSA.

2. **REQUIRED DOCUMENTATION** Students selected for verification will be notified that they have been selected for verification and will be asked to provide the following documentation by a certain date:

- a. Verification Worksheet
- b. Copies of student/parent's tax transcripts or signed tax return for prior-prior year. (This will be unusual beginning 2024-2025 since FPS will be using IRS provided data on the FAFSA.
- c. Any other documentation needed to resolve discrepant information on the FAFSA.

Notification to Students: Once the Financial Aid Office receives the ISIR the system will generate a request for additional information to those students who are selected for verification.

### **THE VERIFICATION PROCESS**

Once the Financial Aid Office determines that the student and/or parents have submitted all of the required and requested documents the Financial Aid Office will compare the documentation with the data reported on the FAFSA by:

1. Verifying that there are no issues of 'concern' or 'C' code issues.
2. Confirming that the following data reported on the FAFSA agrees with the tax return or other financial documentation for anyone's income reported on FAFSA: \* Adjusted Gross Income \* Taxes paid \* Untaxed income and benefits:

- Child support received and paid out
- IRA/Keogh deductions
- Earned Income Credit
- Foreign Income
- Number in household

3. Ensure that the Verification Worksheet is completed correctly and that the income data, household size and number in college reported on the Verification Worksheet agrees with the data reported on the FAFSA. If not, conflicts will be resolved and corrections will be submitted.

a) Only those person's in the student's parent's household that are under the age of 24 will be counted in the household unless the parent can document that they are truly providing 50% of the person's support or have legal guardianship.

b) Independent students will have to prove that they provide 50% support to a person listed in the household who is not the student's biological or adoptive child unless the student can document they are providing 50% or more of the person's support or have legal guardianship.

## VERIFICATION EXCLUSIONS

A student's application may be exempt from the verification process if some or all of the verification requirements due to certain unusual circumstances exist. Except in the case of a student's death, however, none of these verification exclusions excuses the College from the requirement to resolve conflicting information.

- An applicant selected for verification does not have to be verified if the applicant was in jail or prison at the time of verification.
- A recent immigrant does not have to be verified if the student is an immigrant that arrived in the United States during the calendar years that are representative of the academic year.
- The student's spouse is deceased or mentally/physically incapacitated.
- The spouse is residing in a country other than the U.S and can't be reached by normal means of communication.
- Student's parents are deceased or physically incapacitated.
- The parents' are residing in a country other than the U.S. and cannot be contacted by normal means of communication.
- The applicant is a legal resident of Guam, American Samoa or the Commonwealth of the Northern Mariana Islands.
- The applicant is a citizen of the Republic of the Marshall Islands, the Federated States of Micronesia or the Republic of Palau.

Note: GEN 22-06 went into effect on May 18, 2022, regarding Verification for the 2022-2023 award year. The USDE has removed the requirement for all students to complete the V1 verification process for the remainder of the award year.

For the 2024-2025 award year, verifications are once again required for all students selected for verification by USDE or the school.

## **Verification and Signature Requirements**

### **1. Student**

- a. Tax return must be signed by student (or spouse), or the tax preparer must provide his name and SSN, EIN, or PTIN.
- b. Must sign Verification Worksheet.

### **2. Parent(s) (if student is dependent)**

- a. Tax return must be signed by one parent, or the tax preparer must provide his name and SSN, EIN, or PTIN.
- b. One parent must sign Verification Worksheet.

The College uses a Financial Aid File Checklist to ensure regulatory compliance with signature requirements. If a student is tagged for verification, there is a checklist for appropriate documentation. When the tax form is received, there is a place to check that. There is also a place to check that the tax form is appropriately signed.

The College will submit corrections resulting from the verification process. Any corrections made to the student's ISIR will also have corrections submitted to the FAFSA Processing System (FPS).

## **Verification of Nonfiling**

Individuals are required to obtain verification of nonfiling (VNF) from the IRS or other tax authorities. Individuals who are able to obtain verification of nonfiling from the IRS or other tax authority and, based upon the institution's determination, it has no reason to question the student's or family's good-faith effort to obtain the required documentation, the institution may accept a signed statement certifying the individual attempted to obtain verification of nonfiling from the IRS but was unable to obtain required documentation.

Note: A dependent student who is nontax filer is excluded from this requirement to provide verification of dependent student's nonfiling status.

## **WLS Program**

### **Policy regarding Credit Balances**

Whenever the College credits a student's account with a federal work study award is credited to the student's tuition charges. If the total amount of all Title IV, HEA program funds (including FWS and Work College earnings) credited exceeds the amount of tuition and fees, room and board, and other authorized charges, the College will pay the resulting credit balance directly to the student as soon as possible, but (1) no later than 21 days after the balance occurred if the credit balance occurred after the first day of class of a payment period; or (2) no later than 21 days after the first day of class of a payment period if the credit balance occurred on or before the first day of class of that payment period.

### **WLS Program Policy**

In some cases students have the opportunity to begin working on campus (generally after July 1) during the summer prior to the fall semester to earn hours toward their fall work requirement.

With permission of the Work Office, students may work a small percentage above the fall work award. See the current WLS program manual for current guidelines and policies.

### **Policy regarding proper distribution and holding of earned FWS dollars.**

Ecclesia College pays FWS compensation, including Federal Work College earnings, by crediting the student's account at the institution to satisfy current award year charges for tuition and fees, room & board, and other institutionally provided educationally related goods and services, if the student contracts with the institution for such goods and services. The College must receive written authorization from the student.

A student may choose another distribution method, including check or similar instrument, or by electronic funds transfer (EFT) to a bank account designated by the student.

### **Procedure**

During orientation students are given the option of which compensation method they prefer. Verification of consent will be sent to the Financial Aid and Business Offices by the WLS Program Office. A copy of this verification is kept in the student's WLS file and the student's Financial Aid file. It is the responsibility of the WLSP Office to verify if the student has consented to the chosen procedure and that the Financial Aid and Business Offices receive the supporting consent verification.

Ecclesia College currently uses a timeclock for recording work hours. Each week work hours are reviewed. The student's earnings are compensated in four week cycles which will occur no later than 30 days from the last reported work day on the timecard. Students will receive a credit memo electronic "Aid Payment" notification on their SIS Financial Dashboard.

January 1, 2016: Reference Work Colleges legislation regarding work award.

## EXAMPLE OF CHECK LIST AGREEMENT

### Work-Learning-Service Program: Voluntary Authorization

\_\_\_\_\_ I understand that EC's standard procedure is to pay Student Work in the form of tuition credit (or credit on other fees). The payment is earned only as I perform the work. I am giving EC permission to electronically transmit payments to my account. I understand that I may modify or cancel this authorization at any time. I understand if I do not work the minimum required hours for the academic year, that I am subject to the consequences set forth in the WLS Policy Manual.



## **Awarding Federal Work-college Funds**

### **Work Learning Service Program**

Ecclesia College is federally recognized as a Work College.

Ecclesia requires students, including at least one-half of all students who are enrolled on a full-time basis, to participate in a comprehensive work-learning-service program for at least five hours each week or at least 80 hours during each period of enrollment, except summer school, unless the student is engaged in an institutionally organized or approved study abroad or externship program.

The College provides students participating in the comprehensive work-learning service program with the opportunity to contribute to their education and to the welfare of the community as a whole.

Ecclesia College operates a comprehensive student work-learning-service program: A student work-learning-service program that:

- (1) Is an integral and stated part of the institution's educational philosophy and program;
- (2) Requires participation of all resident students for enrollment and graduation;
- (3) Includes learning objectives, evaluation, and a record of work performance as part of the student's college record;
- (4) Provides programmatic leadership by college personnel at levels comparable to traditional academic programs;
- (5) Recognizes the educational role of work-learning-service supervisors; and
- (6) Includes consequences for nonperformance or failure in the work-learning service program similar to the consequences for failure in the regular academic program.

### **Selection Procedures**

As such, the college offers “federal work award” (FWS award) to the extent of available funds, to all eligible students. The amount of the FWS award is not to exceed the student’s financial need.

The College offers “institutional work award” to resident students not eligible for FWS funds.

### **Method of Matching Federal Share**

As a Work College, the College matches Federal funds made available for this program on a dollar-for-dollar basis from non-Federal sources. The institution keeps records documenting the amount and source of its share.

### **Internal Controls in the FWS/WC Program – Reconciliation, Fiscal, and Program Awards**

Ecclesia College will reconcile, at least monthly, its FWS/WC draws in G5 to the funds received in the bank account it has designated to receive electronic transfers. It will also reconcile

monthly the amount drawn down and received to the amount disbursed to students or returned to the Department, and resolve any discrepancies.

- The rate of pay recorded will be verified in the payroll system that corresponds to the Work Office WLP (Work Learning Program) spreadsheet by the Business Office. This rate of pay will be based on position and experience level as addressed in the Work-Service-Learning Manual.
- The Work Office Director of Program Management will use the total work hour information recorded in the WLP on a weekly basis to alert the Financial Aid Office when a student approaches the maximum amount a student may earn to prevent overpayment.
- The Work Office Director of Program, the Dean of Students, the Business Office, and the Financial Aid Office will periodically evaluate the rate of expenditures to determine if the school will expend less, the same, or more than the amount budgeted for FWS/WC expenditures.
- Matching funds will be consistently deposited at the same time Ecclesia receives its federal share. Currently, Ecclesia pays in advance and is reimbursed the federal share.
- Ecclesia will only draw funds from G5 to cover FWS/WC payroll and administrative cost.
- The Work Office will ensure that students are working the reported hours by utilizing the biometric SchoolVision, Time & Attendance Software that provides unmatched time and attendance software. Each student will clock in using their fingerprint at their work station. An alternative approach in some departments will be to have manual timecards that record the number of hours per day and week. Both approaches will be verified by the supervisor and the Work Office.
- Once a month, the Business Office will perform an audit to test hours recorded in payroll system matches the hours reported on student timecards.

## INSTITUTIONAL SCHOLARSHIPS

**PURPOSE:** To describe the rules and criteria for institutional scholarships.

**AUTHORITY/SOURCE:** Finance Committee and Financial Aid Committee.

**POLICY:** Institutional scholarships are established for the purpose of recruitment and retention of students who contribute to enhance the Colleges enrollment goals. Awards may be offered to qualified students who meet one or more of the following eligibility requirements:

- Students with demonstrated financial need
- Students with demonstrated athletic ability
- Students with demonstrated skills: music, drama, etc.
- Students who have demonstrated academic excellence

Programs are administered by the respective areas responsible for the recruitment of students who meet the specified criteria. Each area is responsible for making the awards and providing the Financial Aid Office with a list of recipients. Awards may be for a set amount or full tuition. This may also include an allocation for books and other living expenses. Amounts and award criteria vary widely across programs.

**PROCEDURES:** Upon receipt of award information from administrative/academic area, the Financial Aid Office will issue an award letter. At the beginning of each semester, the Financial Aid Office will verify compliance with eligibility criteria before authorizing disbursement of funds by the Business Office. Students who fail to meet renewal criteria (if applicable) will be notified of the potential loss of eligibility at the end of the Spring semester each academic year. Generally, deficiencies can be made up during the Summer preceding the next academic year.

## STATE PROGRAMS

**PURPOSE:** To describe the rules and criteria for State of Arkansas Programs

**AUTHORITY/SOURCE:** Arkansas Department of Higher Education

**POLICY:** The ADHE administers merit scholarships and need-based grants targeted towards special student populations attending postsecondary educational institutions in the State of Arkansas. The recipients are selected by ADHE and the names are forwarded to the Financial Aid Office for the purpose of sending an award notification and for disbursement through the Business Office. The Financial Aid Office is responsible for verifying all eligibility criteria prior to awarding the state program.

**PROCEDURE:** The process of awarding state programs begins with ADHE sending a list of recipients to the Financial Aid Office identifying the students who meet their criteria for the state program. Need-based grants require the completion of the FAFSA. Recipients must meet satisfactory progress as defined by ADHE. Awards are renewable if the student meets state academic progress standards for renewal.

### **Arkansas Academic Challenge Scholarship**

The Academic Challenge Program provides scholarships to Arkansas residents pursuing a higher education. Funded in large part by the Arkansas Scholarship Lottery, the Academic Challenge Scholarship is available to students regardless of their academic status, whether just graduating from high school, currently enrolled in college, enrolling in college for the first time, or re-enrolling after a period of time out of college. Students can apply and obtain further information at <https://scholarships.adhe.edu/scholarships/detail/academic-challenge-scholarships>.

Basic Eligibility Criteria:

An applicant must:

- Be an Arkansas resident (at least 12 months prior to enrollment) and US citizen/lawful permanent resident
- Be accepted for admission at an approved institution of higher education in a program of study that leads to a baccalaureate degree, associate degree, qualified certificate or a nursing school diploma
- Not have earned a baccalaureate degree
- Complete the Free Application for Federal Student Aid (FAFSA) (although there is no maximum income)
- Not owe a refund on a federal or state student financial aid grant for higher education
- Not be in default on a federal or state student financial aid loan for higher education
- Not borrowed in excess of annual federal loan limits
- Not be incarcerated at the time of application for or during the time the applicant receives the scholarship

- Complied with the United States Selective Service System requirements for registration
- Certify to be drug free