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As with any document of policies and procedures, this guide is continually reviewed and updated to meet the requirements of the United States Department of Education and the needs of our students. For more information on policy updates, contact the Financial Aid Administrator. All changes to this manual must be approved by the Financial Aid Committee and the Director of Cape Girardeau Career and Technology Center.

01 Introduction

Introduction to the Financial Aid Office
The purpose of Cape Girardeau Career and Technology Center’s Financial Aid Office is to assist post-secondary students obtain any and all Federal and State Aid they may be eligible to receive. By doing so, we assist our students in obtaining the quality post-secondary education they desire.

Since 1974, Cape Girardeau Career and Technology Center has operated a Financial Aid Office. The office is currently located at 1080 S. Silver Springs Road, Cape Girardeau, Missouri.

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

The purpose of the Financial Aid office is to: (1) provide professional financial counseling to students and parents concerning meeting the costs of education; (2) administer Title IV Aid programs competently according to the institution’s philosophy and policies as stated in Section 2 and federal regulations; and (3) maintain institutional records of assistance programs and students assisted.

Policies & Procedures Development Responsibilities 34CFR 668.16
The responsibility of financial aid policy decisions are made by the Financial Aid Committee and approved by the Financial Aid Administrator. The purpose of the Financial Aid Committee is to formulate and review policies governing student’s financial aid, keeping its focus on Federal Regulations and the perspective of the total institution. Members of the Financial Aid Committee are the Financial Aid Administrator, the Fiscal Officers, Director of the Career Center, Financial Aid Advisors, the Practical Nursing, Respiratory Therapy, Paramedic and Physical Therapist Assistant Coordinators. The responsibilities of the committee are within the parameters of federal, state, and institutional regulations. The duties of the aid committee shall be: to review and recommend institutional policies for the administration of all student financial aid programs;
to be cognizant of national, state and institutional trends in Student Financial Aid and their impact upon the students and the institution;
to receive reports of progress or problems in the Financial Aid Office and recommend appropriate action, when indicated;
to establish institutional priorities for the distribution of available student aid resources;
to serve as a final appeal body for students with grievances relative to the general administration of the program, when these problems cannot be resolved by the Financial Aid Administrator;
to perform such other duties as may be delegated or requested from time to time;

**Responsible Personnel** 34 CFR 668.16
The Administrator of the Financial Aid Office is supported by an adequate number of professional and clerical personnel to effectively manage the aid programs administered by the school. Currently the CTC employs two full-time student advisors who work with students to package aid. The Cape CTC employs the services of Campus Ivy (CI) to process federal aid. The student accounts are reconciled and managed through a joint effort of the Cape Public Schools financial officer and a CTC business office staff member.

**Documents & Methods**
Students applying for aid must complete the Free Application for Federal Student Aid (FAFSA). This is available, free-of-charge, at [www.fafsa.gov](http://www.fafsa.gov).
After this process has been completed, the U.S. Department of Education will notify the student by sending a Student Aid Report (SAR). The SAR is used to verify that the information submitted is correct. If any corrections need to be made, students may contact the Financial Aid Office or make corrections, using his/her assigned PIN number, at www.fafsa.gov. Student information will automatically be sent to CGCTC if the student has listed CGCTC as their school of choice using Federal School Code 005532. Once CGCTC has verified that the student will be actively enrolled in an eligible program, the Financial Aid Office will send an initial award letter informing the student of the amount of their Pell Grant for the upcoming academic year. This letter also informs students of their possible eligibility for other aid.

**02 Administrative Organization & Office Management**

**Institutional & Division Structure** 2009-10 FSA Handbook. 2-122 - 124
Cape Girardeau Career and Technology Center is hosted by the Cape Girardeau School District #63. The Cape Girardeau Board of Education is the policy-making body responsible for CGCTC. A board-approved organizational chart is located in the Appendix.

**Personnel Policies**
The Financial Aid Office follows policies adopted by the Cape Girardeau Board of Education. Additionally, the Financial Aid Committee may, from time to time, adopt narrow policies regarding operations of the Financial Aid Office.

**Financial Aid Office Structure & Position Responsibilities**

**Financial Aid Administrator**
The Financial Aid Administrator, under the general direction of the CGCTC Director, and in cooperation with the District Business Office Manager provides leadership and direction for the delivery and coordination of federal, state and institutional student financial aid programs, audits, compliance reviews and account reconciliation reviews. The Financial Aid Administrator is
responsible for the management and administration of the student Financial Aid Office, its functions, and staff.

**Responsibilities of the Financial Aid Advisors**
The primary responsibilities of the Financial Aid Advisor and designated staff are to assemble and maintain student aid records, assess eligibility of applicants for aid, complete federally mandated reports, design and implement systems to accomplish these tasks, coordinate fiscal matters with the Business Manager, including student fund requests, accountability for student disbursements, student ledger accounts. This position requires knowledge of federal regulations, institutional policies and procedures, ability to deal with clients about sensitive issues and the ability to deal with continually changing program regulations.

In addition, the Financial Aid Advisor and designated staff are to maintain student financial aid records/files, verify application data on selected applicants, calculate student awards, collect progress reports for satisfactory progress determinations from Attendance/Registrar Department, maintain up to date knowledge of relevant federal regulations, process incoming mail, other general office duties.

**Frequent Contact Information**
Appendix contains updated contact information for district and institutional officers.

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**03 General Aid Office Administration**

**Accommodations for Disabilities**
Cape Girardeau Schools/CGCTC does not discriminate on the basis of disability in admission to its programs, services, or activities, in access to them, in treatment of individuals with disabilities, or any aspect of their operations. The Cape Girardeau School District also does not discriminate on the basis of disability in its hiring or employment practices.

This notice is provided as required by Title II of the Americans with Disabilities Act of 1990 and Section 504 of the Rehabilitation Act of 1973. Questions, complaints or requests for additional information regarding the ADA and Section 504 may be forwarded to the designated ADA and Section 504 compliance coordinator.
Compliance Coordinator
301 N. Clark Avenue
Cape Girardeau, MO 63701
573.335.1867 -- Mon-Fri, 8:00 a.m. - 4:00 p.m.

**Appointments with Staff**
The Financial Aid Office is open from 8:00 a.m. – 4:00 p.m. Monday through Friday during regular school days. Appointments at other times may be scheduled in advance. For prompt attention, appointments are recommended.

**Treatment of Correspondence/Forms**
Approved registration forms may be obtained from the Admissions Office. Financial aid forms may be obtained from the Financial Aid Office at 1080 S. Silver Springs Road, Cape Girardeau, Missouri.

**Telephone**
The Financial Aid Office phone line is (573) 334-0826. Protected student information will only be given over the phone once identity has been established.

**Records Management & Retention**
34CFR 668.24; 34CFR 668.163
Financial aid records are located in the main Financial Aid Office in Cape Girardeau. The Financial Aid Advisors have the responsibility for maintaining these files and records. Cape Girardeau Career and Technology Center retains all financial aid records and files as required by law for three years from the end of the award year for which the aid was awarded.


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

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

CGCTC does not produce a student directory of adult students; therefore personal student information will not be disclosed.

Students will be provided annual notification of their right to inspect, review and request an amendment to their educational records. The student then has the right to request a hearing (if the request for an amendment is denied) to challenge the contents of the education records, on the grounds that the records are inaccurate, misleading, or violate the rights of the student.

Inquiries concerning policies, procedures or compliance with federal and state regulations and guidelines may be addressed to the Financial Aid Administrator.

**Complaint Resolution Process** 34 CFR 600.9 (6)(1)

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

**CBHE POLICY ON COMPLAINT RESOLUTION**

**Introduction:**

In order for institutions of higher education to participate in the federal student aid programs authorized by Title IV of the Higher Education Act of 1965, an institution must be legally authorized to provide post-secondary educational programs within the state in which it is located. By rule promulgated by the U.S. Department of Education, part of this “state authorization” requirement is that the state must have “a process to review and appropriately act on complaints concerning the institution including enforcing applicable State laws ….” 34 C.F.R. § 600.9(a)(1). For its part, the institution must “provide students or prospective students with contact information for filing complaints with its accreditor and with its State approval or licensing entity and any other relevant State official or agency that would appropriately handle the student’s complaint.” Id. at § 668.43(b).
The Coordinating Board has determined that from the perspective of the institutions and of students and prospective students, it is preferable to have a simplified process with a central clearinghouse for addressing complaints rather than a complex matrix of contact points that might not cover every possible complaint and might also easily become outdated. Therefore, this policy sets out a process by which the Missouri Department of Higher Education will serve as the clearinghouse for complaints concerning colleges and universities authorized to operate in the State of Missouri, acting on those within its purview and forwarding those that are not to other entities for their appropriate action.

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

**Exhaustion of Remedies at the Institutional Level**
Many issues fall within areas that generally are within the sole purview of an institution and its governing board. Examples include, but may not be limited to, complaints related to student life (such as, student housing, dining facilities, or student activities and organizations) and certain academic affairs (such as the assignment of grades). Moreover, issues or complaints are generally more speedily and appropriately resolved within the grievance channels available at the institution. Face-to-face discussion of the matter through open door policies or other informal means is the preferred starting point. Should that fail, the complainant should use formal dispute resolution mechanisms provided by the institution. Exhaustion of all informal and formal institutional processes, including both campus processes and any applicable system processes, is a prerequisite to filing any formal complaint with the MDHE pursuant to this policy.

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

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

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

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

**Note:** Prior to initiating this formal process, complainants must first call the MDHE at 573-526-1577 to indicate their desire to file a complaint. At that time, the MDHE will ascertain whether the issue can be resolved through informal means and also determine whether administrative processes available within the institution of concern have been exhausted. If after that screening the complainant still desires to initiate a formal complaint, the MDHE will send the complainant the form to be filled out and returned for that purpose.

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

### 04 Financial Aid Programs 34CFR Parts 602 and 603

**Institutional Eligibility Requirements** 34CFR 600.6(a)(5)(ii); 34CFR 600.6(a)(2); 34CFR 600.7(a)(1)(iv); 34CFR 668.32(e)

CGCTC is an eligible, public post-secondary vocational institution. CGCTC is legally authorized by the State of Missouri to provide postsecondary education programs. CGCTC is accredited by the Council on Occupational Education (COE). The school admits as regular students only individuals with a high school diploma or its recognized equivalent, or individuals beyond the age of compulsory school attendance in the State of Missouri. Financial statements are prepared in accordance with Government Accounting Standards Board policies (GASB) and prepared on the accrual basis. The school has sufficient cash reserves to make required refunds, meet all of its financial obligations, and is current in its debt payments.

**Program Eligibility** 34CFR 668.3; 34CFR 660.2; 34CFR 668.8; 34CFR 691.2(b)

CGCTC’s academic year definition is 26 weeks and/or 900 clock hours of instructional time. Any eligible program that is less than or exceeds the school’s academic year definition will have student awards prorated to meet the specific definition of that eligible program. Award year begins July 1 of one year and ends June 30 of the following year.

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

**Administrative Capability** 34CFR 668.16

**Administration**

The Cape Girardeau School Board of Education governs the operation of CGCTC. The Superintendent of Schools is responsible for the overall function of the institution while the day-to-day operations are coordinated by the Director of CGCTC. The District Business Manager and Director of Financial Aid are the primary administrators in dealing with the Financial Aid Office.
**Records** 34CFR 668.14; 34CFR 668.24; 34CFR 668.27; 34CFR 682.610; and 34CFR 685.309(c)

CGCTC keeps comprehensive, accurate program and fiscal records related to its use of FSA program funds for the minimum of three (3) years from the end of the award year. CGCTC has established and maintains, on a current basis, any application submitted for FSA program funds.

Other program records that are maintained include:

- Program Participation Agreement, Approval Letter, and Eligibility and Certification Approval Report (ECAR)
- Accrediting and licensing agency reviews, approvals, and reports
- State agency reports
- Audit and program review reports
- Other records, as specified in regulation, that pertain to factors of financial responsibility and standards of administrative capability.

CGCTC also keeps records that substantiate the eligibility of students for FSA funds, such as:

- Cost of attendance information
- Documentation of a student’s satisfactory academic progress (SAP)
- Documentation of student’s program of study and the courses in which the student was enrolled
- Data used to establish student’s admission, needs analysis documents, enrollment status, and period of enrollment
- Required student certification statements and supporting documentation
- Documents used to verify applicant data, and resolve conflicting information
- Documentation of all professional judgment decisions
- Financial aid history information for students-Student Account Sheets

**Electronic Processes** 34CFR 668.16(o); DCL GEN-04-08, September 2004 Federal Register, 09-14-2004,55418-55420

CGCTC contracts with Campus Ivy (CI) for the processing of student financial aid. CI and CGCTC transmit confidential student information via CORE (CI electronic system). The Campus Ivy Core system is a cloud based application hosted by Microsoft with a layered security approach, which uses SSL Certificates, IP address access restriction and the encryption of personally identifiable information. The environment is setup with redundancies to minimize down time and the possibility of loss of data. Microsoft Azure SQL database automatically creates backups of every active database every hour. Safeguards against possible fraud and abuse include:

- pass-word protection,
- pass-word changes at set intervals,
- access revocation for unsuccessful log-ins
- CGCTC Financial Aid office along with CI personnel uses
- the E-App to submit and update the school’s eligibility information through www.eligcert.ed.gov
- the Student Aid Internet Gateway (SAIG) system at www.fsawebenroll.ed.gov to verify users and access to information
- the COD Website https://www.cod.ed.gov to confirm completion of entrance counseling and signing of MPN.
- the National Student Loan Data System (NSLDS) to submit the school’s student enrollment updates, FSA program overpayments, and NSLDS Transfer Student Monitoring Records at https://www.nsldsfap.ed.gov/secure/logon.asp
• electronic submission for the school’s annual compliance and financial statement audits through https://www.ezaudit.ed.gov
• the Information for Financial Aid Professionals (IFAP) Web site to review Dear Colleague Letters, announcements, or Federal Registers at ifap.ed.gov

**Information Discrepancies 34CFR 668.16(f)**
CGCTC will not disburse aid until any conflicting information has been resolved. All resolutions of conflicting information will be documented in the student’s file explaining the resolution, in detail, and accompanied by any supporting documentation. If a student withdraws and has conflicting information in their file, resolution will be made by financial aid staff before making late or post-withdrawal disbursement.

Conflicting information consists of, but is not limited to:

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

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

**Cohort Default Rates 34CFR 668.16(m)(1)**
The Department releases draft default rates in February which allows CGCTC an opportunity to review and correct the data that will be used to calculate their official cohort default rates. In the early fall of each year, the Department issues the official cohort default rates. The cohort default rate for Federal Stafford or for Direct Subsidized/Unsubsidized Loans made to students for attendance at CGCTC must remain below 25% for the three most recent fiscal years, or lower, if possible.

The CGCTC’s efforts to positively affect the CRD are ongoing. Students participate in a one-on-one meeting before taking out student loans in an effort to better inform students regarding student debt. The CGCTC employs a Default Prevention Specialist (DPS) who meets with students several times during the enrollment at the CTC to provide financial literacy and planning information. The DPS also completes exit counseling with all students upon graduation or exit from a program. Students are contact during the grace period to answer questions and remind them of upcoming payments. The DPS also reaches out to delinquent students.

**Reporting & Reconciliation**
Campus Ivy (CI), on behalf of the CTC, completes reconciliation and reporting to FISAP, G5, COD, and NSLDS. CI utilizes the reports from COD and G5 to make sure that CTC reports and originations/disbursements are accurate. CI compares all Federal Pell Grant and Federal Direct Loan disbursement information from COD to their Core system on a monthly basis. Any discrepancies are reviewed and the appropriate updates are made to reconcile each account to zero. CTC Business Office staff compares the Core disbursement information with their internal student ledger postings on a monthly basis. This ensures that COD, Core and the CGPS student information system all reconcile. CGPS District Business Office also provides CI with copies of
the monthly statements for their federal bank accounts, which are compared to G5 and COD balances to ensure there are no discrepancies there.

**National Student Loan Data System**  
34CFR 682.610

NSLDS has recent information on student enrollment, grant and loan aid the student may have received at other schools, in addition to the student’s repayment status. Checking a student’s NSLDS history also reduces the chances of over-awarding aid. CI checks the student NSLDS status before processing aid to ensure eligibility.

Cape CTC updates Core (CI electronic system) with all enrollment changes daily through the file import process. NSLDS is updated based upon that file update. CI reports enrollment updates every 60 days through the Core system (SSCR). Additionally, every Friday enrollment status changes such as withdrawals, graduates, and LOA’s are reported to NSLDS through Core.

Additionally through the exit interview process, the CTC Default Prevention Specialist checks the student’s status, lenders, etc through NSLDS to assist students with beginning the repayment process.

**Student Eligibility Title IV Requirements**  
34CFR 668.32 (c)(2)(ii); 34CFR 668.32(e), (f),and (g)(1); 34 CFR 668.33; CFR 668.34; 34 CFR668.35(a)-(c),and (h); 34CFR 668.36; 34CFR 668.37; 34CFR 668.40; 34CFR 668.16(e); 2009-10 FSA Handbook Vol.1-Ch 1

To receive FSA funds, a student must be qualified to study at the postsecondary level. A student qualifies if s/he:

- has a high school diploma (this can be from a foreign school if it is equivalent to a U.S. high school diploma)
- has the recognized equivalent of a high school diploma, such as a general education development or GED certificate
- has completed homeschooling at the secondary level
- has satisfactorily completed six credits of college work that are applicable to a degree or certificate offered by the school.
- A student may self-certify on the FAFSA that he has received a high school diploma or GED or that he has completed secondary school through homeschooling as defined by state law.

A student must be a citizen or eligible noncitizen to receive aid from the FSA programs. The eligible statuses are:

- A U.S. citizen or national;
- A U.S. permanent resident;
- Other eligible noncitizens.

A person is not eligible for FSA funds if he is in default on an FSA loan or he owes an overpayment on an FSA grant or loan and he has not made a repayment arrangement for the default or overpayment. The CGCTC Financial Office/CI staff will check the student’s FSA history on NSLDS to verify eligibility.

To be eligible to receive FSA funds, each student must provide a correct Social Security number (SSN). To confirm the student’s SSN, the Department conducts a match with the Social Security Administration.
Any man required to register with Selective Service at any time must have done so to receive aid. The Department performs a match with Selective Service to confirm a student’s registration status.

CGCTC does not consider incarcerated students for enrollment in any program of study. A federal or state drug conviction can disqualify a student for FSA funds. The guidelines and worksheets provided by the Department of Education will determine whether the student is eligible for FSA.

**Federal Aid Programs in Which CGCTC Participates**

**PELL** 34CFR 690; 34CFR 668.164; Section 428G(a) of the HEA

Federal Student Aid may be available for any course, which includes, at least, 600 clock hours of instruction. Students must have completed their Free Application for Federal Student Aid (FAFSA). Pell Grant awards are based on the Expected Family Contribution (EFC) on the student’s SAR or ISIR, CGCTC’s academic year definition and the student’s cost of attendance. The Scheduled Award amounts are specified on the Pell Payment Schedules released by the Department.

A student must be enrolled in an approved course of study to receive a Pell grant.

**Direct Loan Program (DL)** 34CFR 685

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

When CGCTC receives Program funds, it must disburse the funds within 3 business days. The right-to-cancel and refund notices are sent automatically to the student through the Core system once Federal Direct Loan funds have been disbursed or refunded to a student’s account. The right-to-cancel notice informs the student of the date of the disbursement, the type of funds, the amount, the award year and their 14 day right-to-cancel. The notice tells the student how they should notify the school that they wish to cancel the funds. The refund notice informs the student of the date of the refund, the type of funds, the amount and the award year. The notice tells the student to contact the school if they have any questions on their refunds.

Students will be advised in writing of how the loan funds have been applied to their account within 30 days (Student Account Ledger).

Students must complete entrance counseling and a Master Promissory Note (MPN) prior to being approved for a Direct Loan on the website [http://www.studentloans.gov](http://www.studentloans.gov).

Once the entrance counseling is completed, a confirmation is received from COD and is included in the student’s file. A copy of the student’s MPN is also retained in the Core system. Students must also complete exit counseling for their Direct Loans. Students are scheduled to complete in person exit counseling with the CTC Default Prevention Specialist (DPS). Exit counseling is completed using the NSLDS website. The DPS also visits the loan servicer website with the student, answers specific questions and establishes a personal contact for the student. The advantages to completing exit counseling on the NSLDS site include:

- Meets school requirements for Exit Counseling
- Data is automatically sent to GAS, ED Servicers
• Compliant for DL
• Includes borrower’s actual loan data
• Flexible reporting options
• Automatic update of completion date for EDExpress

The Financial Aid Office regularly requests exit counseling completion reports from the NSLDS website which are then sent to our SAIG mailbox. A copy is placed in the student’s file. When it is found that a student has not completed required exit counseling, the Financial Aid Office will notify him/her in writing of the requirement to do so and will include the sites necessary to complete the counseling.

**State Aid Programs in Which CGCTC Participates**

**Access Missouri State Grant Program**
CGCTC participates in this program which is administered by the Missouri Department of Higher Education (MDHE) who determines the award amount. Communication concerning the awards is conducted through MDHE’s FAMOUS software/website.

**A+ Program**
The Missouri Legislature enacted the Missouri Higher Education A+ Financial Incentive Grant Act authorizing and directing the Missouri State Board for Higher Education to implement a program of Missouri A+ Financial Incentive Grants. The purpose of these grants is to assist Missouri students seeking postsecondary education with free tuition. Assuming that state funds are available, graduates may be eligible to receive up to two years of free tuition to attend a Missouri public community college or vocational-technical school if they meet specific requirements. Student A+ Incentive Grants are known as Missouri A+ Tuition Grants. Students must provide a copy of their high school transcript with an A+ Seal on it. The Financial Aid Office then bills MDHE for any tuition amount not covered by the Federal PELL Grant program for the current period.

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

**Workforce Investment Act (WIA)**
This funding is available through Missouri Career Center and the Workforce Investment Board.

**TRA/TAA**
The Division of Workforce Development administers this program which has been established to help American workers who become totally or partially unemployed due to increased imports.

**Vocational Rehabilitation**
Students may apply for financial assistance through this program. Vocational Rehabilitation will determine eligibility.

**Veteran’s Educational Assistance**
If the student is a U.S. Veteran and/or meets the criteria of the Veteran’s Administration, he/she may qualify for educational assistance. Contact the Department of Veterans Affairs for more information.

**05 Student Consumer Information Requirements**
*General Provisions Subpart D; 34CFR 668.41-48; 34CFR 668.14(d); 34CFR 668.14(c)(1)*
Consumer information as required in Subpart D of the General Provisions include financial assistance information and information about the school’s academic programs and policies, information on graduation and completion rates, and information about the school’s security policies and crime statistics report. Drug and alcohol prevention materials are available as well as information for borrowing students regarding FSA loan programs, loan obligation and repayment options. Consumer information must include any refund policy with which the school must comply, the requirements for the treatment of Title IV funds when a student withdraws; and the requirements and procedures for officially withdrawing from the school.

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

06 Application Process  AVG -5-40

CGCTC utilizes the U.S. Department of Education’s Free Application for Federal Student Aid (FAFSA) to determine a student’s eligibility for FSA. This application is available at www.fafsa.gov. After submitting the FAFSA, the student receives a Student Aid Report (SAR), which includes a summary of application information and the determination of the expected family contribution (EFC). This EFC is the result of computations involving the financial and non-financial data submitted on the application. The method of computation is applied to all students uniformly. Students should review all the information on the SAR. If any changes are necessary the student contact the Financial Aid Advisors and provide the necessary documentation. Corrections will be made using FSA ACCESS to CPS Online. If they meet all eligibility requirements, they will receive an award letter notifying them of the amount of their Pell grant award and projected payment schedule.

Students in programs spanning over two award years who applied for financial aid the previous year may qualify to use a Renewal FAFSA. The student may access the Renewal Application online by using their FSA ID. On the renewal the student should correct his or her information and submit it to the processing center. The school will receive an Institutional Student Information Record (ISIR). The student will receive a SAR Information Acknowledgement. The student must have an electronically signed ISIR for their financial aid file. This ISIR will be used to determine the student’s award.

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

Deadlines
Student FAFSA must be processed by CPS of the Department of Education by April 1 of current year for State Aid and June 30 of the following year for Federal.

Document Collection & Tracking
As Institutional Student Information Records (ISIRs) are received by CI, they are uploaded to CORE. As students are accepted, their ISIRs are retrieved from CORE, student files are created, award letters sent and funds disbursed if student meets all required criteria. Any printed ISIRs that are not matched with a student by the end of the award year will be destroyed.

07 File Review

Verification  34CFR 668.53  General Provisions, Subpart E Selection of Applicants to be Verified  34CFR 668.54(a)(2)(i)(ii); 34CFR 668.54(b); 34CFR 668.53(a)(1); AVG-81-100
All ISIRs received from USDE with an asterisk (*) by the EFC must be verified. The Financial Aid Office may also choose a student to be verified even if the Department of Education has not. This will only be practiced when it is obvious to the Financial Aid Office personnel that information on the ISIR may not be correct. No Title IV aid will be disbursed until the required documentation is provided and verified as correct. Students selected for verification will be notified by letter and must submit the completed worksheet and required documentation to the Financial Aid Office within 21 days to avoid a cancellation or delay in the processing of financial aid.

Applicants excluded from verification, (absent conflicting information) include, but are not limited to:

- Applicants who die during the award year (regardless of conflicting information)
- Applicants who are legal residents (or dependents of parents who are legal residents) of the Commonwealth of the Northern Mariana Islands, Guam, or American Samoa
- Applicants who are citizens of (and dependents of parents who are citizens of) the Republic of the Marshall Islands, the Federated States of Micronesia, or the Republic of Palau
- Incarcerated students
- Dependent students whose parents reside outside the United States and cannot be contacted by normal means of communication (exclusion is applicable to parental information only)
- Applicants who are immigrants and arrived in the United States during either calendar year of the award year
- Applicants whose parents’ address is unknown and cannot be obtained (exclusion is applicable to parental information only)
- Dependent applicants when both parents are deceased or physically or mentally incapacitated (exclusion is applicable to parental information only)
- Applicants who will not receive Title IV assistance for reasons other than the applicant’s failure to verify the information on the application
- Transfer students who completed verification at the previous school and the current school obtains the correct information/data
- Any other applicants excluded from verification by the school

**Acceptable Documentation & Forms**

34CFR 668.57(a)-(d)

CGCTC’s Financial Aid Office uses Campus Ivy’s (CI) Verification Worksheets. Required documentation is considered to be student and/or parent federal tax return transcript for the base year. All tax returns must be signed by the filer. If the student and/or parent were not required to file, they may mark the appropriate box on the verification worksheet. If income is reported, but a tax return not filed, the student and/or parent must submit proof of that income such as, but not limited to W-2 forms, 1099 form, etc. Please see below chart of additional acceptable documentation to clear verification.
Amended Tax Returns for
If the institution is aware of an amended tax return, to complete verification they must get a:
- IRS Tax Transcript of original return or
- IRS Record of Account of original return or
- A Return Transcript for Taxpayer of original return and
- Signed copy of amended 1040X that was filed
Identity Theft
A tax filer who has fallen prey to IRS identity theft should call 1-800-908-4490.

Upon verification of identity, the tax filer can obtain a Tax Return Data Base View (TRDBV)

See DCL – GEN – 14-05

Data Elements to be Verified 34CFR 668.16(f); 34CFR 668.56
CGCTC’s Financial Aid Office will verify the student’s household size, the number of family members reported to be in college, student’s and/or parent’s adjusted gross income and income earned from work, the amount of income tax paid and any untaxed income and/or benefits, such as child support, IRA or Keogh deductions, interest earned on tax-free bonds, etc.

Conflicting & Inaccurate Information 34CFR 668.53(a)(4)
When inaccurate or conflicting information is found during the verification process, it must be resolved. The student is contacted in an attempt to resolve any conflicts. Additional documentation may be required to resolve the conflict. When it is found that errors were made outside the $400.00 tolerance, corrections must be made to the student’s FAFSA. These changes could result in a change in the student’s EFC which would then affect the amount of the student’s awarded aid package.

Student Notification of Verification Changes 34CFR 668.53(a)(3); 34CFR 668.59(a)
When changes are made to the student’s FAFSA application that effect the student’s EFC and award, the student will be notified immediately via verbal &/or written communication and a new award letter sent reflecting the award amount that corresponds to the student’s new EFC.

Database Matches, Reject Codes & “C” Codes Clearance
In the event the Financial Aid Office receives Potential Over-payment (POP) Report, all aid processing ceases until the POP situation is resolved. NSLDS and the student’s prior school may be contacted to ensure an over-payment does not occur. When it is found that the student has been over-awarded, the award will be adjusted to resolve the POP situation.

In the event the Financial Aid Office receives a Multiple Reporting Record (MMR), all aid processing ceases until the MMR situation is resolved. The Financial Aid Office will contact the stated school to resolve the conflict. While a student can be dually enrolled, only one school can pay FSA that being the degree-granting school. In most instances, the student has failed to report to their previous school that they have transferred and enrolled elsewhere. The previous school only has to show the student as withdrawn to cure the MMR.

When the Financial Aid Office receives an ISIR with a C flag where the EFC should be, the reject codes will be identified. The most common reject C flags are for the following:
• The student has defaulted on a student loan and is not eligible for FSA. The Financial Aid Office will notify the student immediately and advise them to cure the default and provide them with the contact information provided in the ISIR.
• The student has not registered with Selective Service System. All males between the ages of 18-25 are required to register. If the student is required to register, they may do so by entering a correction on their FAFSA application, registering at the post office, where registration forms are provided, or on-line at www.sss.gov. This will cure the C flag. If
the student is not required to register, they must provide a letter from the Selective Service System stating they are not required to register.

- The student’s name and SSN do not match. It is often easier for the student to complete a new FAFSA when they have entered the wrong SSN. The Financial Aid Office can require proof of name and SSN from the student and proceed with processing. Proof shall be the student’s original SS card, birth certificate and marriage licenses or court orders if names have been changed by court order.

**Review of Subsequent ISIR Transactions—Post-screening**

The Financial Aid Office will review all subsequent ISIR transactions received on student’s enrolled in a program of study at CGCTC. As submitted changes are marked by symbols, this process is fairly simple. Once enrolled, it should not be necessary for students to make FAFSA corrections. If a student feels a correction is necessary, they should contact the Financial Aid Office for assistance.

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

**08 Cost of Attendance Calculations**

**Various Student Populations**

Campus Ivy (CI) provides the CTC with financial aid budget components which is a breakdown by month. These amounts address average room, board, transportation, personal and miscellaneous expenses. From these amounts an annual amount is found for each budget category. (sample CI budget in appendix)

**How Costs are Derived & Updated**

Cost of attendance (COA) is calculated with tuition and fees plus indirect cost of room and board, transportation and personal expense from the Economic Policy Institute (EPI) Family Budget. The budget allows us to pull the cost of living in this area by zip code so it is a good estimate of the indirect cost for our students. (To view the family budget go to [http://www.epi.org/resources/budget/](http://www.epi.org/resources/budget/))

The EPI is an independent, nonprofit organization that researches the impact of economic trends and policies on working people in the United States. Their budget data is pulled from several databases of the US Department of Housing and Urban Development, The Center for Nutrition Policy and Promotion (CNPP), Child Care Aware of America, Federal Highway Administration, Internal Revenue Service, the US Department of Health and Human Services and Bureau of Labor and Statistics.

The Pell COA is pulled from the full academic year cost on the COA chart, which can be found in Core (CI system). By using the Core system to process funding information to COD it enables us to automatically pull the Pell COA directly from the chart every time an award and/or disbursement is updated to COD.

**Budget Restrictions**

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

**09 Awarding/Packaging Financial Aid**
Packaging Philosophy

CGCTC’s Financial Aid Office will package student aid in a manner that will attempt to meet the financial needs of all students while minimizing student debt.

Available Amounts & Number of Eligible Students.

Award amounts are derived based on Department of Education and Missouri Department of Higher Education guidelines. Student eligibility is determined by FAFSA need analysis.

Campus-based Program Amounts

All packaged aid comes from Title IV and outside funding sources such as WIA, TRA, etc. CGCTC has no campus-based aid programs.

Packaging Groups

CGCTC has no campus-based aid programs.

Determining Award Amounts

Award year begins July 1 of one year and ends June 30 of the next year. The amount of a student’s Pell award is based on the number of clock hours in the program and the student’s EFC. For those programs that are 900 clock hours in length the student is eligible for their maximum scheduled award.

Dependent students are eligible to borrow $3,500.00 in subsidized loan funds and an additional $2,000.00 in unsubsidized loan funds so long as all aid received by the student does not exceed their cost of attendance for Award Year 1.

Independent students are eligible to borrow $3,500.00 in subsidized loan funds and an additional $6,000.00 in unsubsidized loan funds so long as all aid received by the student does not exceed their cost of attendance for Award Year 1.

For those programs less than 900 clock hours in length, the student’s award is pro-rated based on the number of clock hours in the program and the student’s scheduled award.

For those programs more than 900 clock hours in length, the student is awarded their maximum scheduled award for the first 900 clock hours of instruction and the remaining period is prorated based on the remaining clock hours and the student’s scheduled award for that period of the award year.

Students enrolled in programs of more than 900 clock hours are eligible for Award Year 2 loan amounts once they have completed the first 900 hours. AY2 annual loan maximums are as follows: Dependent Student $4500 subsidized and $2000 unsubsidized; Independent Student $4500 subsidized and $6000 unsubsidized. Respiratory Therapy students may receive AY3 loan limits for the last 450 hours of the 2250 hour program.

Package Construction

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

*Bureau of Indian Affairs* 34CFR 673.6

Once a student has completed all necessary forms to determine eligibility for a Bureau of Indian Affairs Grant, CGCTC will prepare any necessary documentation to verify the student’s enrollment and assist the student in initiating receipt of grant aid. The Bureau of Indian Affairs Grant is considered in the student’s aid package.

**Vocational Rehabilitation**

The Division of Vocational Rehabilitation sends the Financial Aid Office an authorization for any enrolled student they support. Vocational Rehabilitation normally pays the difference between the cost of the student’s program and the amount of the student’s Pell award – a voucher from VR will verify payment amounts. Vocational Rehabilitation assistance is considered in the student’s aid package.

**Veteran’s Educational Benefits** 2009-10 FSA Handbook 3-144

The VA certifying official is located in CGCTC’s Financial Aid Office. Once a student has completed all necessary forms to determine eligibility for benefits, the certifying official will complete the VA’s enrollment form to begin the student’s benefit. If a student withdraws the certifying official will notify VA.

**Student Needs Analysis** 34CFR 674.9

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

To the extent that they are able, parents have the primary responsibility to pay for their children’s education.

Parents will, as they are able, contribute funds for their children’s education.

Students, as well as their parents, have a responsibility to help pay for their education.

The family should be accepted in its present financial condition.

A needs analysis system must evaluate families in a consistent and equitable manner, while recognizing that special circumstances can and do alter a family’s ability to contribute. Briefly, for dependent students, three broad categories of family resources are examined in need analysis. They are: (1) Parent’s Income (the Available Income Concept); (2) Parent’s Assets (the Income Supplement Concept); and (3) Student Resources (including summer earnings, and other similar benefits). For independent students, income and assets are examined. Need is determined for Pell Grants by a formula developed and updated annually by the Federal Government.

A copy of the student’s need analysis will be included in every student file.

**Treatment of Educational Tax Provisions**

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

Missouri’s 529 College Savings Plan, offers a convenient, flexible, and tax-advantaged way to save for a college education. This state-sponsored plan features significant federal and state tax benefits, including a state income tax deduction of up to $8,000 per year ($16,000 if married, filing jointly) for Missouri taxpayers. More information can be obtained by calling 888-414-MOST.

Section 127 Educational Assistance Programs

These programs are offered as a fringe benefit. For more information, consult a tax professional.

**Award Package Notification** 34CFR 673.5
CGCTC’s Financial Aid Office notifies students of their award package by an initial award letter. This letter is not sent until it is verified that the student is, in fact, enrolled in a program of study at CGCTC.

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

**Award Package Notification**  
Revisions 34CFR 673.5(b)  
In the event a student’s award package should be changed, the student will be notified, in writing, of the amended award and the reasons for the amendment will be stated in the notification. Possible reasons for award revisions would be: the student received additional funding (scholarship, grant, etc.) after initial notification sent, student’s EFC changed, requiring a new need-analysis, student defaulted on a student loan awarded at another school, the student requested and received a consideration of special circumstances, any change in the student’s status that would be reflected in their EFC or enrollment status.

**Overawards**  
34CFR 673.5  
CGCTC’s Financial Aid Office will strive to prevent over-awards and over-payments of FSA funds.

**Resolving an Overaward When Student is Liable**  
Revisions 34CFR 668.32(g)(4); 34CFR 668.35(e)-(h); 34 CFR 673.5(f)(4)(ii); 34CFR 673.5(f)(5)  
If it is discovered that a student has received an over-payment due to supplying false information, failing to disclose or falsifying information, the Financial Aid Office will adjust the amount of the student’s aid package to eliminate the over-award.

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

If the student claims that the school made a mistake in determining the overpayment, we will consider any information he or she provides and decide whether the objection is warranted. If, after notification to the student and consideration of possible objections, an overpayment remains, and the student has not repaid or made satisfactory arrangements to repay the overpayment, the student’s overpayment will be reported to NSLDS and CGCTC will refer the over-payment to USDE for collection. The CGCTC will cooperate fully with any efforts and procedures of the USDE to recover the funds including but not limited to referring a student to the Office of Inspector General.

**Resolving an Overpayment When School is Liable**  
34CFR 668.22; Section 498(c) of HEA  
When the Financial Aid Office discovers a student has been awarded aid which exceeds the student’s need, we will make adjustments to the student’s aid package to prevent an over-award. If funds have already been disbursed when the overpayment is discovered, and the over-payment is a result of an error by the school, CGCTC’s Financial Aid Office will make downward adjustments to the student’s award in COD, and return the funds through G5. CGCTC will then attempt to collect funds we have returned from the student. However, this will not be considered a Title IV debt, because the overpayment was due to an error on the part of the school.
PJ Authority & Individuals Who May Exercise It
PJ determinations are not taken lightly as doing so alters the student’s EFC. Professional Judgment is only to be used in extreme cases and when the student can provide the documentation to show that it is justified. CTC’s third party servicer, Campus Ivy (CI), assist in determining PJs. Paperwork and documentation is submitted to CI and the CTC financial aid advisors are notified of the outcome. The Financial Aid Administrator must be notified of any reasons and adjustments made to an award before the student is notified. The student is notified of the change and is given a copy of the revised award letter.

Circumstances Where PJ May be Used & Possible Actions
PJ is most commonly used in cases where the student, their parents or their spouse has had a significant change in income. PJ could also be used in cases where the student cashed in a 401K, other retirement plan, or a significant investment that was reported on the tax return for the base year, but that income is no longer available to them. PJ might also be considered if the student, their parents or spouse had medical expenses in excess of the allowance in the Department’s EFC formula.

Other possible PJ situations are:
- Dependency Override
- Selective Service

Regardless of the type of PJ, they must all meet the standard of a unique and unusual circumstance.

Request for PJ Consideration
CGCTC’s Financial Aid Office will not consider a professional judgment determination unless it is requested by the student or their parents. Consideration will not take place until all required documentation is received. A copy of the Special Considerations form is included in Appendix.

Documentation
The documentation required for a PJ determination will vary, but could include:
- tax returns,
- letter of unemployment status, including date of termination,
- final pay record from employer with year-to-date income clearly stated,
- benefits letter from the Missouri Division of Employment Security,
- proof that investment or retirement plan funds are no longer available,
- proof of paid medical, unreimbursed medical expenses.
- Student and/or Parent Statement
- 3rd Party collaborating statement
- Court Documents

11 Disbursements
Disbursement Process
FSA disbursements are made on a payment period basis. Each payment period is 450 clock hours in length. Programs longer than 900 clock hours still have 450 hour payment periods, but may also have a remaining period that is less than 450 hours in length. FSA funds are paid at such times and in such installments within each payment period for each student to successfully complete half the weeks of instructional time and half the clock hours in the program.
Campus Ivy (CI) processes Pell and Direct Loans on behalf of the CTC. Financial aid advisors receive an “OK to Pay” list from CI prior to the disbursement date. Once SAP, attendance, and award amounts are verified, the financial aid advisors approve or disapprove and return to CI. A disbursement report will then come from CI and includes the amounts and the date funds will post to the CTC federal account.

**Definition of Disbursements & Disbursement Methods**
Funds are considered ‘disbursed’ to the student when they are applied to the student’s account. When FSA funds are received, funds are transferred to the school’s general fund on the student’s behalf or directly to the student when the student’s financial obligations to the school have been fulfilled. As a means of internal checks and balances, no one person or office shall package, authorize, and disburse FSA funds to students. (Packaging is completed by the financial aid advisors. Authorization or drawing of funds is completed by CI. Disbursement of funds is completed by the district &/or CTC business office staff.)

**Disbursement Dates & Schedules** 34 CFR 668.167
CGCTC will notify students of the amount of funds the student can expect to receive from each FSA program, and how and when those funds will be disbursed. The original notification – which includes an estimated date of disbursement - is sent as apart of the award letter worksheet. If the funds include a Direct Loan the notice will indicate which funds are from subsidized loans and which are from unsubsidized loans. CGCTC will notify the student, in writing / electronically, of the anticipated date and amount of the disbursement and the student’s right to cancel all or part of the loan or disbursement and the time by which the student must notify the school that they wish to cancel the loan or disbursement. If a student elects to take DL funds, the student will meet in person with the financial aid advisor to sign the award letter and other documentation as needed. CGCTC Financial Aid Staff and District CTC/Business Office will have three business days to disburse funds to student accounts once received in the Federal Funds for Student Financial Aid account.

**Student & Parent Authorizations** 34 CFR 668.165(b)
Students are notified via a student receipt when funds are disbursed. When loan funds are included in a disbursement, the student may refuse loan funds up to 14 days following the date of disbursement.

**Disbursing Title IV Funds by EFT to Designated Bank Account** 34 CFR 682.207(b)(i)(ii),(v)
CGCTC disburses all FSA funds by paper check or EFT to bank account. Students must submit a direct deposit form and voided check to CGPS central office at least two weeks before a disbursement to receive an EFT.

When a student chooses to receive refunds / credit balances through EFT, a paper check is written and sent to the CTC office. The student is notified and required to sign for the check on-site. The date of the signature is the delivery date of the check. If the check is not picked up nor negotiated within 90 days, the check will be void and reissued. If the second check should reach 90 days, that check will be void and the CTC will return the funds to the Department of Education.

**Disbursing Title IV Funds to Pay Institutional Charges for Educationally-Related Activities Other Than Tuition, Fees, Contracted Room & Board, & Minor Prior-Year Charges**
CGCTC assesses no charges, other than tuition, books and fees.
Holding Excess Title IV Funds (Credit Balances) 34 CFR 668.164(c)(1)(ii), and (e); FR 72-152, August 8, 2007, page 44630; 2009-10 FSA Handbook 4-16

Financial Aid Coordinator or CTC business office staff will evaluate the accounts following each financial aid disbursement to ensure no credit balances exist. Any FSA credit balance will be paid to the student within the 14-Day regulatory timeframe.

Title IV Eligibility & Payment Information 34 CFR 682.604(a)(2); 34 CFR 682.604(c)(3)(ii); 34 CFR 682.201(a)(1); 34 CFR 682.604(f) and (g); 34 CFR 685.304; 2009-10 FSA Handbook Vol. 2-78

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

Crediting Title IV Loan Proceeds & Borrower’s Cancellation Right 682.604(c),(d)

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

Crediting Post-Withdrawal Disbursements Containing Title IV Loan Proceeds & Borrower’s Cancellation Right

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

If the student is entitled to a post-withdrawal disbursement but does not have a balance with the school, the student is given the opportunity to request or deny the loan funds be drawn. The CTC withdrawal form includes a statement instructing CTC personnel of the student’s wishes regarding this manner. Grant funds will be disbursed unless the student requests for those funds to not be disbursed.

Offering Post-Withdrawal Disbursements Not Credited to Student’s Account

When a Return to Title IV (R2T4) calculation reveals a student is entitled to a post-withdrawal disbursement through Pell or DL funds, the student is given the opportunity to accept or refuse the post withdrawal disbursement – documented via the CTC withdrawal form. If contact can not be made with the student, the post withdrawal disbursement involving Pell funds will be made by the Financial Aid Office, through CI, and sent to the student at their last known address. When post-withdrawal funds include loan monies, the student is given the opportunity to notify
the Financial Aid Office to carry out the loan disbursement or refuse and cancel the loan disbursement.

12 Satisfactory Academic Progress

Requirements for Satisfactory Academic Progress

Requirements for Satisfactory Academic Progress

Satisfactory Academic Progress (SAP) means a student must be proceeding in a positive manner toward fulfilling certificate requirements in a specific length of time. Students must be in good standing and making satisfactory progress according to the institutional standards before receiving Federal Financial Aid (Title IV) assistance. Good standing means that the student is capable of enrollment or continued enrollment established in criteria for each certificate program at the Cape Girardeau Career and Technology Center (CGCTC).

Federal regulations require that students meet certain academic standards to be eligible for financial aid programs. At CGCTC the basic standards are:

1. Students are expected to maintain satisfactory cumulative grades.
2. Students are expected to successfully complete the clock hours that they are enrolled in each period.
3. Students are expected to complete their program in a timely manner.
4. Students must also be working on their first certificate (unless approval is granted on appeal).

All coursework is evaluated for financial aid purposes whether or not financial aid was received for that work. These standards will be evaluated at the end of each payment period. In all CGCTC programs, a payment period consists of 450 hours. The number of weeks to accumulate the 450 hours will depend upon the hours attended each week in a particular program. (see chart)

Qualitative: Cumulative Grades

Students must meet the standards of the Cape Girardeau Career and Technology Center in order to retain eligibility and remain in good standing. The qualitative component includes grades, work projects completed, or other comparable factors that are measurable against a norm. The CGCTC uses a student’s cumulative grade to determine compliance with the qualitative component of SAP. A student must maintain a minimum cumulative grade of “C” at the end of each payment period to meet this standard.

Due to the nature of all CGCTC programs which run as cohort models (all students begin and progress the program as a group, the program is taken as a whole, not individual classes), transfer hours are rarely accepted. However, should a transfer be allowed, those grades would be used in the calculation of SAP. If a student withdraws from the program, the student must begin with a new cohort. If a student is allowed to start at the second (or later) payment period, cumulative grades from the previous completed payment period(s) will be included in SAP calculations.

Each student’s cumulative grade will be reviewed by the financial aid staff at the completion of each payment period.
**Quantitative: Hours Completed for Period**
Students must complete 90% or more of the clock hours for which they are enrolled during each enrollment period (coincides with payment period) to meet SAP. Some programs have more stringent requirements for attendance in order to remain enrolled in those programs. Students must meet those requirements in order to remain enrolled.

To remain eligible for Federal Financial Aid the student may be absent no more than 10% in a payment period (45 hours for a 450 hour payment period). This policy is distributed to students upon enrollment. The first disbursement of Title IV funds for first time entering students at CGCTC requires no progress check provided the first disbursement is issued during the payment period of training for a new student. At the end of their first payment period students must be making satisfactory progress.

Students missing five consecutive days of classes without notification to the school will be administratively withdrawn from the CGCTC.

**Pace: Maximum Time to Complete a Certificate Program**
Pace of program completion is an additional quantitative standard of Satisfactory Academic Progress. Students may take up to 150% longer than the normal time of their program to complete that Program and still be regarded as being in good standing. However, a student will NOT BE ELIGIBLE for Title IV federal financial aid once he/she has received aid for the number of hours in the program. For example, a student in a 36 week course could be allowed up to 54 weeks to complete.

**FA Warning:**
Students who do not meet the standards to retain financial aid eligibility will automatically be placed on financial aid warning and may continue to receive financial aid for one payment period. A student who meets the standards while on warning status will return to good financial aid standing.

**FA Probation:**
The status of Financial Aid Probation will be assigned to a student who fails to meet the standards for Satisfactory Academic Progress and who has appealed and has had eligibility for financial aid reinstated. Conditions may be imposed for a student’s continued eligibility to receive financial aid. During this time, the student may receive aid for one payment period or for a specified timeframe outlined on their academic plan. During the period of enrollment of Financial Aid Probation, the student must be making Satisfactory Academic Progress or successfully following an academic plan. If not, the student will be suspended from financial aid.

A student suspended from financial aid (other than the maximum time limit) may re-establish eligibility by attending at their own expense until they meet the minimum standards.

**Appeal Process:**
The appeal is the process by which a student who is not meeting the Satisfactory Academic Progress standards petitions for reconsideration of eligibility for aid. In some cases, a student’s failure to be in compliance with one or more of these requirements is due to events totally beyond the student’s control. If such extreme circumstances can be documented for the specific periods of enrollment when the deficiencies occurred, the student may submit an appeal that will be considered by the Appeals Committee. Appeals will only be considered for documented extreme circumstances. Examples of situations that may be considered beyond a student’s control include: the death of a relative, an injury or illness of the student, or other special
circumstances. An appeal request must be submitted in writing to the Assistant Director of the CGCTC accompanied by appropriate supporting documents, which may include documents requested by the Financial Aid Appeals Committee. The Financial Aid Appeals Committee makes recommendations to the CGCTC’s Director.

A student wishing to appeal should submit a written appeal to the Assistant Director of the Cape Career and Technology Center within five calendar days from date of notification of loss of financial aid eligibility. The appeal must include why the student failed to meet the Satisfactory Academic Progress standards and what has changed that will allow the student meet the Satisfactory Academic Progress at the end of the next term or a designated point in time.

An appeal following a period of Financial Aid Probation must be accompanied by an academic plan signed by program instructor which outlines how the student will be able to get back on track for successful completion by the end of the next period of enrollment or by a specific point in time.

The Financial Aid Appeals Committee will review the appeal and the academic plan and approve or disapprove the reinstatement of aid. If the student fails to follow the approved academic plan or the appeal is not approved, all aid will stop until the student has re-established eligibility at his/her own expense.

Failure to meet Satisfactory Academic Progress standards results in the loss of eligibility to receive federal financial aid which includes grants and loans.

**Transfer Students:**

All certificate programs at the CGCTC are designed to serve a cohort of students. Students are expected to begin and progress through the program courses as a group. Therefore, students are required to complete all hours within a program in order to earn a certificate. Under unique circumstances an exception to this requirement could be made.

Student transfers from other institutions: Students from other institutions are expected to meet all entrance requirements and, if accepted, begin a program with the next cohort group.

Transfer of credit from another institution: CGCTC normally does not accept credit from other institutions to be applied toward program coursework. An example of an exception would be if a student came from a like program due to the unexpected closure of said program. These situations are considered individually and students are required to prove competency in the subject area before credit is granted. (Program-specific accrediting body guidelines and stipulations must be followed.) A student requesting the transfer of credit is required to provide transcripts, course syllabi, and other documentation requested by the review committee. The review committee will consist of the CTC Assistant Director, program faculty, and student advisor. Students will be notified of the committee decision in writing. If an exception is granted, the student is then placed at the appropriate point in an existing cohort and credit given for previous coursework. Previous coursework from other institutions is not considered in the cumulative grade calculation at the CGCTC.

Transfer between CGCTC programs: Students requesting to transfer between CGCTC programs must make this request within the first week of class. Transferring students must meet all entrance requirements of the new program and are subject to availability and waitlist in the same manner as new applicants.
Changes in Certificates:
Students that request a change in the certificate being pursued are allowed to receive financial aid for the new program of study. Students that have changed to a new certificate program must comply with the SAP policies outlined elsewhere in this section. Previous coursework that does not apply to the new certificate will not be apply to determination of compliance with SAP standards.

Pursuit of an Additional Certificate:
Students must file an appeal with the Assistant Director of the CGCTC if they wish to seek an additional certificate at the CGCTC. The Assistant Director will consult with the Program’s Coordinator or appropriate Department Chair and the school’s Director in responding to the appeal. All SAP standards of the CGCTC will apply to the new program of study.

Repetitions, Withdrawals, Incompletes, Remedial and ESL Courses:
For repeated coursework, the most recent grade a student has earned will be used in determining the student’s cumulative grade. All clock hours completed by a student will apply to the Quantitative and Pace standards of the SAP policy.

Students may receive financial aid for a program they withdraw from and then reenter after 180 days.

Students receiving a grade of Incomplete have one semester to complete the coursework or the grade will be converted to a failing grade. Coursework assigned a grade of Incomplete will be included in the Quantitative and Pace standards of the SAP policy. The resulting grade at the end of the following semester will be used in the calculation of the student’s cumulative grade.

The CGCTC does not offer remedial or ESL coursework. Credit for such coursework at previous institutions will not be accepted by the CGCTC.

Terms of Enrollment:
Terms of enrollment or periods of enrollment vary by program at the CGCTC. Some programs include the summer term as a part of the period of enrollment. Regardless of the calendar for a program of study, payment periods and periods of enrollment are based on clock-hour standard definitions (450 clock hours in a payment period for example). Programs that include the summer term will complete up to 1,350 clock hours in a 12 month period of enrollment. SAP is therefore determined for each payment period (including summer for those programs meeting in the summer term). Financial aid is pro-rated for payment periods in accordance with federal financial aid regulations.

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

The Satisfactory Academic Progress standards to be monitored include:
- Student maintains a cumulative grade of C.
- Student is absent less than 10% of a payment period – 45 hours in a 450 hour payment period (or within the attendance policy of the program… whichever is the most stringent).
- The student maintains a pace of progress that assures completion of a program in no more than 150% of the published time for that program.
Financial aid staff will monitor the following sources of information to determine that students are meeting the standards:

- Cumulative Grade as recorded in the CGCTC Student Information System.
- Attendance as recorded in the CGCTC SIS / attendance tracking system.
- Enrollment status and course load as recorded in the ACEware system.
- Progress reports and counseling records as provided by instructional staff.

At the end of each grading period, a designated financial aid official will electronically check grades and attendance to ascertain that the student is making satisfactory academic progress.

A sticker indicating that SAP has been met will be affixed to the student’s financial aid file.

13 Return of Title IV Funds \textit{34CFR 668.43; HEA Sec 484B;}

\textbf{Process Overview \& Applicability} \textit{34CFR 668.22; 34CFR 668.43(a)(4); 34CFR 682.607}

CGCTC will determine the earned and unearned portions of Title IV aid as of the date the student ceased attendance based on the amount of time the student was scheduled to be in attendance. When the Financial Aid office receives notification of a withdrawal, all necessary information will be submitted to Campus Ivy(CI) for the calculation of the R2T4 including hours scheduled, hours attended, and student account ledger. In return, CI performs the R2T4 calculation and updates the student information with COD and NSLDS.

\textbf{Withdrawal Date} \textit{34CFR 668.22(b),(c); 34CFR 682.604(d)(4); 34CFR 682.605}

When a student begins the official withdrawal process or provides official notification to the CGCTC Financial Aid Office of his or her intent to withdraw, the date of the student’s withdrawal would be the date the student began the official withdrawal process, or the date of the student’s notification, whichever is later. If a student did not begin the official withdrawal process or provide notification of his or her intent to withdraw.

\textbf{Formula Calculation} \textit{2009-10 FSA Handbook Vol. 5-51; 34CFR 668.22(a)(2)}

CGCTC’s Financial Aid Office uses the payment period R2T4 calculation to determine the amount of aid earned by the student based upon the scheduled hours on the last day of attendance (LDA). R2T4 calculations will be completed within 30 days of notification of a student’s withdrawal. CGCTC and CI utilizes their R2T4 calculation tool which is modelled from the US Department of Education R2T4 worksheets.

\textbf{Post-Withdrawal Disbursements} \textit{34CFR 668.22(a)(3),(4),and (5)}

When a Return to Title IV (R2T4) calculation reveals a student is entitled to a post-withdrawal disbursement, the student is given the option whether to draw those funds (Pell or DL). The CTC withdrawal form documents the students wishes. If contact cannot be made with the student and a post-withdrawal disbursement of Pell funds is due, the post withdrawal disbursement is made by the Financial Aid Office and sent to the student at their last known address. When post-withdrawal funds include loan monies, the student is given the opportunity to notify the Financial Aid Office, in writing, to carry out the loan disbursement or refuse and cancel the loan disbursement.

\textbf{Returning Unearned Funds} \textit{34CFR 668.22(g), (h); 34CFR 668.21}
When the R2T4 calculation determines that unearned Title IV funds were disbursed to a student, CGCTC will return those funds to all applicable sources. When Pell funds are a part of the return process, the student’s award will be adjusted and sent to COD. Those funds will be returned to USDE. Refunds or returns will be processed within 45 days of notification of student’s withdrawal.

Refunds due shall be applied in the following order:

- Unsubsidized Loan
- Subsidized Loan
- Perkins Loan
- Graduate PLUS Loan
- Parent PLUS Loan
- PELL Grant
- ACG
- SMART
- FSEOG
- TEACH Grant

**Overaward Resolution**  
34CFR 682.604(h); 34CFR 668.22(h)(4); 34CFR 668.32(g)(4); 34CFR 668.35(e)-(h)

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

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

**Institutional Refunds**

CGCTC institutional refunds are calculated as follows: During the first 60% of a payment period, refunds of tuition will be made to a student’s account based simply on the percentage of days completed for that payment period. For example, a student’s account will receive a 90% refund of tuition for a payment period in which the student exited from the program after only 10% of the term has passed, the student will be responsible for all applicable tuition and fees for that term. Students will be charged for only the books and fees for which they have received.

14 **Title IV Fraud**

**Student Fraud** 34CFR 668.16(g)

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

**Institutional & Third Party Fraud** 34CFR 668.16(g)
CGCTC contracts with a third-party servicer to complete the processing of student financial aid. Campus Ivy (CI) is located at 1180 SW 36th Avenue Suite 204, Pompano Beach, FL 33069, phone 844-848-5332
All referrals to the Inspector General should be submitted as stated in Section 34 CFR 668.16(g) OIG referrals.

15 Audit Requirements 34CFR 668.23(a)(1) to (5)
Financial aid records and student files are audited every year. Auditors review a sample of student aid files to ensure the Financial Aid Coordinator is in compliance with federal, state and institutional policies.

Type of Audit
An independent auditor conducts an annual audit of CGCTC’s compliance with the laws and regulations that are applicable to the FSA programs in which CGCTC participates (a compliance audit), and an audit of CGCTC’s financial statements (a financial statement audit). The Single Audit Act requires schools to have an audit conducted in accordance with the Office of Management and Budget’s (OMB) Circular A-133, Audits of States, Local Governments, and Nonprofit Organizations.

Preparation for Audit
Financial Aid office staff cooperates with the auditor’s requests. Typically, the auditor will randomly select a specific number of students to inspect. The files are pulled and given to the auditor. Any additional assistance requested is responded to promptly.

Audit Submission Schedule 34CFR 668.23(a)(4)
These audits are submitted annually through USDE’s website www.ezaudit.ed.gov, no later than December 31 of each year or within six months of the end of the school’s fiscal year.

16 Appendices

Organizational Flowchart
Contact List
Code of Conduct
Guide to Private Educational Loans
Creation of Student File
Sample Forms
Contact List

Dr. Neil Glass, Superintendent
Cape Girardeau Public School District #63
301 N. Clark Avenue
Cape Girardeau, MO  63701
573.335.1867, Ext. 1016

Lindsey Dudek, Chief Financial Officer
Cape Girardeau Public School District #63
301 N. Clark Avenue
Cape Girardeau, MO 63701
573.335.1867, Ext. 1018

Dr. Libby Guilliams, Director
Cape Girardeau CTC
1080 S. Silver Springs Road
Cape Girardeau, MO  63703
573.334.0826, Ext. 6556

Jonathan Crowley, Assistant Director
Financial Aid Director
1080 S. Silver Springs Road
Cape Girardeau, MO 63703
573.334.0826, Ext. 6551

Jeanna Lohman, Financial Aid Advisor
Cape Girardeau CTC
1080 S. Silver Springs Road
Cape Girardeau, MO  63703
573.334.0826, Ext. 6510

Lesley Hobbs, Financial Aid Advisor
Cape Girardeau CTC
1080 S. Silver Springs Road
Cape Girardeau, MO 63703
573.334.0826, Ext. 6515

Kristine Smith, Administrative Assistant
Cape Girardeau CTC
1080 S. Silver Springs Road
Cape Girardeau, MO  63703
573.334.0826, Ext. 6553
Private loans help student’s bridge the gap between their federal aid eligibility and their Cost of Attendance. These loans offer a variable interest rate and eligibility depends on credit score information. These loans are typically more expensive than Federal loans. It is recommended that students exhaust all other Federal aid programs before seeking a private loan. For a more in depth look and comparison of participant in the Private Loan program visit:

www.finaid.org/loans/privatestudentloans.phtml

www.studentlendinganalytics.com/ratings

We do not provide a preferred lender list for private education loan products. As a borrower, the choice of lender is yours. Borrowers are encouraged to understand the terms and conditions, fees, repayment information and interest rates of the private loan products for which they are applying.

Should you need information from us to complete your private loan process, we will be most happy to assist you.
Code of Conduct

Revenue-Sharing Arrangements: The Cape CTC will not enter into a revenue sharing arrangement with any lender. The CTC will not enter into an arrangement with a Title IV lender where the lender pays a fee or provides other material benefits to the school or its officers, employees or agents in exchange for the CTC recommending the lender to its students.

Gifts: Any CTC officer, employee or agent with responsibilities with respect to education loans for financial aid is prohibited from requesting or receiving gifts from lenders, guarantors or loan servicers. A gift is any item or service having a monetary value for more than a de minimus amount.

Exceptions include the following:

- Materials or services related to loan issues, default aversion and prevention, or financial literacy;
- Expenses integrally related to training designed to improve service to the school and contribute to professional development;
- Favorable loan conditions provided to students employed by the College if the same conditions are provided to all other students at the school;
- Entrance and exit counseling services that are controlled by College staff and that do not promote a specific lender;
- Contributions from a lender, guarantor or servicer made to the College that are philanthropic, unrelated to education loans are not made in exchange for an advantage related to education loans;
- Education grants, scholarships or financial aid administered by or on behalf of a State.

Gifts to Family Members: Gifts to family members and others with relationships to employees, officers, and agents will be considered gifts to said employees, officers and agents if they know about the gift and believe the gift was based on the position of the employee, officer or agent.

Contracting Arrangements: A CTC officer, employee or agent with responsibilities with respect to education loans or financial aid is prohibited from receiving financial benefit from a lender or lender affiliate as compensation for any consulting or services provided to or for a lender.

Interaction with Borrowers: The CTC will not assign a loan from a first-time borrower to a particular lender or delay or refuse to certify a loan based on the borrower's choice of lender or guarantor.

Offers of Funds for Private Loans: The CTC will not request or receive an offer of funds from a lender for private education loans including funds for opportunity pool loans to its students in exchange for concessions or promises to the lender regarding the number or volume of Title IV loans made by said lender or a preferred lender status for such loans.

Staffing Assistance: The CTC will not request or accept assistance from a lender for call center or financial aid office staffing. A school can receive assistance for FAA training, lender identified education materials for borrowers, and short-term non-recurring staffing assistance during emergencies.

Advisory Board Compensation: Any CTC employee with responsibilities with respect to education loans for financial aid who serves on an advisory group established by a lender, guarantor or group of lenders or guarantors may only receive reimbursement for reasonable expenses related to serving in the group.
Creation of Student File

1. Student completes their FAFSA.
2. Once a student is enrolled in a class an ISIR (Informational Student Information Record) is picked up electronically and a student file is opened.
3. If the student has been selected for the verification process by the Department of Education, an asterisk will appear next to the EFC. A verification request will be given to the student which the student will complete and return with the required documentation.
4. Should corrections need to be made to the Student’s FAFSA, those are completed and a new ISIR is sent to CGCTC which is placed in the student file.
5. An Award Letter is mailed indicating the amount of financial aid that is being offered to the student. If they are accepting a loan, they are directed to the www.studentloan.gov website to complete a Master Promissory Note (MPN) and Entrance Counseling.
6. The signed Award Letter is placed in the student’s file.
7. The following documents must also be placed in the student file prior to disbursing financial aid:
   a. Consent to Apply for Federal Aid
   b. Drug Free Signature page
   c. Entrance Counseling confirmation if a student is requesting loan funds
   d. Master Promissory Note confirmation if a student is requesting loan funds
8. When disbursements are scheduled to be made, a Financial Aid Eligibility Form is sent to the instructors for verification of Satisfactory Academic Progress.
9. A copy of the signed form is placed in the student file.
10. The student receives their student financial aid as requested on their award letter according to the guidelines developed by CGCTC for payment of all charges owed.
11. Any excess DL or Pell money will be sent to the student in check form via the Central Administration Office.
12. Each disbursement throughout the award year is noted on the student account ledger and placed in the Student Account Ledger notebook.
13. If a student requests additional loan funds, they must meet with a financial aid advisor to make an adjustment on their original award letter and sign or initial and date the change.
Sample Forms Available

- R2T4 Calculation Worksheet
- Cover Letter for Financial Aid Award
- Award Letter
- Student Loan Website Information
- Sample Fee Chart
- Sample Student Account Log
- Direct Deposit Authorization Form
- Campus Ivy Forms:
  - 2016-17 CI Required Forms List
  - 2016-17 File Transmittal Check List
  - General Information Form
  - Loan Information Form
  - Change to Loan Request
  - Parent Load Information
  - 2015 Federal Tax Return Filing Requirements
  - 2016-17 FA Budget Chart
  - FA Budget Packaging Worksheet
  - Unusual Enrollment History
  - Special Circumstances Forms
  - 2016-17 Verification Forms
- Professional Judgment Packet