HOLY CROSS COLLEGE

INTRODUCTION
Federal regulations mandate that institutions have written policies and procedures. Beyond the federal requirement, there are many benefits to having a written document outlining financial aid office policies and procedures: 1) for distribution to appropriate others outside the Financial Aid Office for the purpose of informing and fostering an understanding of the complexity and operation of the Financial Aid Office; 2) for Financial Aid Office staff as a referral guide to assist in maintaining consistency in the problem-solving process; and 3) as an important component of a comprehensive training program.

STATEMENT OF PURPOSE
The purpose of this document is to record policies and procedures surrounding the delivery of financial aid at HOLY CROSS COLLEGE (HCC).

THIS MANUAL
- Provides the financial aid staff with current policies and procedures surrounding federal, state and institutional programs.
- Provides each staff member with the general responsibilities of the total staff and the office’s relationship to other departments/divisions of the school.
- Provides each staff member with general office procedures ensuring that similar situations would be handled consistently.
- Provides quick reference to various programs, problems, forms, rules and regulations.
- Provides a clear understanding of policy, authority and responsibility in matters relating to operational practices.
- Provides orientation and training materials for new personnel.

FINANCIAL AID REFERENCE DOCUMENTS
There are many resource guides which assist the Office of Financial Aid staff. These citations are maintained in the Director’s office in volumes and are available to staff members.

The documents which are used to determine students’ eligibility for financial aid include current regulations published in the Federal Register, Department of Education guides (such as the Federal Student Financial Aid Handbook, Verification Guide, formula books, and Audit Guide), Dear Partner Letters, financial aid legislation and other laws or regulations that impact student aid.

This Policies and Procedures Manual does not include all details of the administration of financial aid programs and the related references should be used for in-depth clarity.

FINANCIAL AID PHILOSOPHY AND OBJECTIVES
Through its Strategic Plan, HCC evaluates its mission, purpose and objectives. The objectives of the Financial Aid Office revolve around the major functions
of the office. Those functions include: 1) awarding and setting up for disbursing of funds; 2) reporting at the institutional, state and federal levels; 3) providing a satisfying, open-door policy to assist students.

PURPOSE
The HCC Office of Financial Aid offers scholarships, grants, federal student loans, and federal work study employment opportunities. This is for qualified, deserving students who can benefit from further education, but who lack financial resources to continue their education. Aid is granted according to individual need as determined by the Free Application for Federal Student Aid (FAFSA).

PHILOSOPHY
We believe that a consistent and equitable approach to the awarding of financial aid will enable students to attend HCCI who would not otherwise have the financial resources to enroll. It, therefore, encourages a student population which is culturally, economically, socially and geographically diversified.

GOALS
The primary goal of the Office of financial aid at HCC is to provide financial means by which a student can continue his/her education. The financial aid programs at HCC are administered according to the following principles:

The primary responsibility for financing education lies with the student and his/her family. When the total resources they can provide do not meet their educational expenses, HCC will guide students and assist them with seeking alternate funds for their post-secondary education. Interested individuals will be made aware throughout the year of financial aid opportunities. A student must submit a FAFSA application each year in which he or she expects to be considered for financial aid. A confidential financial aid package will be developed and offered to the student based on individual need and circumstances, but without regard to age, sex, race, color, religion, national origin or handicap.

Planning/counseling sessions are important and help students plan for the most efficient use of financial aid and the student’s resources for education. They are held on an as-needed basis with any student.

The Office of Financial Aid at HCC operates within federal and state guidelines and other standards of individual aid programs.

GENERAL FINANCIAL AID OFFICE ADMINISTRATION

OFFICE HOURS
The Financial Aid Office is located in the Vincent Building rooms 153 and 154. It is normally open and available to serve students from 8:30 a.m. to 5:00 p.m. Monday through Friday. Hours on holidays and during student breaks may vary.

CORRESPONDENCE
General correspondence is routed to the appropriate personnel. When appropriate, correspondence should be responded to within one week. If a staff member is responding to a specific concern, it is standard procedure for the staff member to have the Director review the correspondence. This allows the Director to be aware of potential problems.

TELEPHONE
Telephone calls are answered in a friendly and professional manner. Typically, each staff member answers his or her incoming calls. If the caller requires specific information, the staff member should screen the call thoroughly and transfer the information and caller to the appropriate individual.

**DISTRIBUTION OF FORMS**
General financial aid forms and information are distributed from the Office of Financial and via the Financial aid pages on HCC website.

**STAFF MEETINGS**
Office customer service meetings are held bi-monthly. Financial aid staff meetings are held as needed.

**APPOINTMENTS WITH OFFICE STAFF**
Students and parents who require general information may see a staff member without an appointment. If a student requests an appointment with a staff member, an appointment is arranged.

**RECORDS MANAGEMENT**

**CONFIDENTIALITY OF RECORDS**
All records and conversations between an aid applicant, his/her family and the staff of the Financial Aid Office are confidential and entitled to the protection ordinarily given a counseling relationship. HCC strives to assure the confidentiality of student educational records. As a rule, all currently enrolled and former students have the right to review their records to determine their content and accuracy. A student who wishes to obtain access to his/her financial aid record must schedule an appointment with a financial aid staff member.

**AUTHORIZATION TO RELEASE INFORMATION**
HCC complies with the provisions of the 1974 Family Educational Rights and Privacy Act (FERPA). FERPA assures students attending a postsecondary educational institution that they have the right to inspect and review certain educational records and to seek corrections of inaccurate or misleading data through informal or formal procedures. FERPA also protects student FERPA rights by setting strict limits on disclosure of students’ educational records without their consent. HCC has designated the following information as directory information under FERPA and, as such, may be disclosed, without consent, to a third party upon request. HCC has designated the following information as directory information under FERPA and, as such, may be disclosed, without consent, to a third party upon request:

- Student's name
- Degrees, honors and awards received
- Major field of study
- Dates of attendance

A student must submit a written release for additional information to be given to any person or agency.

Students are notified annually of their rights under FERPA.
STUDENT CONSUMER INFORMATION

In order to understand the complicated field of financial aid, accurate and timely dissemination of information to consumers is vitally important. Several policies have been implemented to ensure appropriate dissemination is achieved.

Information regarding HCC Office of financial aid programs and policies is distributed through the following published documents:
The HCC Catalog (includes eligibility requirements, application process, academic progress requirements and aid programs available)
The HCC Website

Additional resources are published outside of, but are distributed through the Financial Aid Office. These resources include:

- Funding Education Beyond High School, published by the U.S. Department of Education
- Pamphlets regarding electronic filing, published by the U.S. Department of Education
- Entrance and Exit Counseling Guides for Borrowers, published by the U.S. Department of Education

Other disclosure and reporting requirements are met as follows:

- An annual campus security report is distributed from the Dean of Students office. These statistics must be published in a report for the previous three calendar years by October 1 of each year and distributed by HCC email to current students and employees annually. HCC submits a web-based statistical report to the U.S. Department of Education (USDE) on an annual basis.
- Completion and graduation rates are available in the Registrar’s Office. These rates are published in the Student Handbook for new students and in the catalog. These statistics must be published in the USDE’S IPEDs report each year for the period September 1 through August 31 and are disclosed to all enrolled and prospective students.
- A review is done to highlight HCC’s compliance with the drug-free schools and campuses regulations at least once every two years. Information on HCC’s Drug-Free and Alcohol-Free Campus and Workplace Policy is given to all staff and students annually and it is published in the Student Handbook for new students and in the Employee Handbook for new employees.
- Constitution Day, a federal student aid (FSA) regulation, is held once a year on September 17th or the day before or after depending on what day it falls on if a weekend. A file is kept in the Financial Aid Office, which highlights activities/events that coincide with this celebration.
POLICIES AND PRACTICES GOVERNING STUDENT FINANCIAL ASSISTANCE

By signing the Award Letter, you agree to comply with the following policies regarding your financial aid award at HCC. Failure to meet the requirements may result in you having to repay funds and being denied future financial aid.

1. The Office of Financial Aid reserves the right on behalf of HCC to review and cancel an award at any time because of changes in financial or academic status, or change of academic program. If an overpayment occurs, the student is responsible for reimbursing the school.

2. Recipients of financial assistance from HCC MUST notify the Office of Financial Aid of any grants, scholarships, loans, etc., extended to them from sources outside the school, as these may reduce and or adjusts the financial aid award. Also, any change in name, address or student status must be reported.

3. Most financial aid awards are based on a student’s financial need. Information that is reported on the FAFSA is used to calculate an Expected Family Contribution (EFC). Financial aid awards are calculated based on the following equation: Cost of Attendance – EFC – EFA (Estimated financial assistance) = Financial Need. Costs of attendance (COA) figures are available in the financial aid office. EFA can include scholarships or other resources which are also subtracted from the COA to determine need.

4. Financial aid is awarded contingent upon enrollment in an eligible program and maintaining satisfactory academic progress. The school catalog provides information about these policies.

5. It is HCC’s policy to disburse financial aid each term. In no instance will a portion of the award be disbursed to the student prior to registration. Refer to the school catalog for registration information.

6. Any commitment of federal/state/institutional funds is tentative and contingent upon subsequent Congressional appropriation and actual receipt of the funds by HCC.

7. New applications for financial aid are required and should be submitted as soon after January 1st as possible for the following school year. Students are responsible for securing and completing the necessary applications online.

8. Concurrent Enrollment: Students enrolled in courses at other colleges while also enrolled at HCC, must inform the Financial Aid Office. Students may receive financial aid at only one school in a given term.

9. Federal Pell Grant: Pell Grant awards are based on the student’s EFC as determined by the FAFSA. After a student is awarded and accepts his/her awards, the Pell Grant is disbursed directly to the student’s account each term. Students’ tuition and fees are charged to their student account and any excess funds are issued to the student via a refund check. If an overpayment occurs, the student is responsible for reimbursing the school.

10. Federal Supplemental Educational Opportunity Grant (SEOG): Funds are very limited and are awarded by HCC to Pell-eligible students who show financial need as indicated on the Student Aid Report (SAR). Priority is given to those students with 0 EFC. Disbursement will be made to the student’s account.

11. Federal Work Study (FWS): If the student’s offer of financial assistance includes employment under the Federal Work Study Program (FWSP), the amount shown for this category is the amount of money the student may expect to earn during the academic year as a result of work performed. On-
campus work study students are paid minimum wage. Community service work study students will be tutoring grade school students in reading and/or mathematics and will follow federal guidelines as outlined in the annual agreement between the organization (e.g. the elementary school) and HCC. FWS students will be issued a check according to the semi-monthly pay schedule located in the main office.

12. Federal Direct Student Loans: Federal Direct Student Loan eligibility is determined by the FAFSA. All students are awarded the maximum that they are eligible for in the current academic year and are instructed to accept or decline their awards. After a student is awarded and accepts his/her awards, the student loan is disbursed directly to the student’s account each term (after the drop and add date). Students’ tuition and fees are charged to their student account and any excess funds are issued to the student. The student will be notified via email within days of each loan disbursement, of the dollar amount disbursed and of their right to cancel. If an overpayment occurs, the student is responsible for reimbursing the school.

13. Federal Direct Parent (PLUS)Loans: Plus Loan eligibility is determined by the FAFSA. Parents of dependent students are eligible to apply. Applications are available in the Office of Financial Aid. After a student is awarded and accepts his/her awards, the parent loan is disbursed directly to the student’s account each term. Tuition and fees are charged to the student’s account and any excess funds are issued to the student. The parent will be notified in writing within 30 days of each net loan disbursement and of their right to cancel. If a Parent Plus loan request is declined for credit reasons, the student will be awarded an additional $4,000 or $5000 per academic year in unsubsidized funds.

14. Federal Perkins Loans: Federal Perkins loan funds are reserved for students with exceptional financial need. Perkins Loan eligibility is determined by the FAFSA and the student is awarded based on personal need from $1000 to $3,000 per award year (also depending on availability of funds). The Perkins recipient fills out the application, entrance interview, statement of rights and responsibilities and promissory note before funds are disbursed to his/her student account. The student will be notified in writing within 30 days of each loan disbursement of the dollar amount disbursed and of their right to cancel.

15. Private Loans: HCC has an Alternative Loan Benefit Comparison Chart available for students on the financial aid website. HCC certifies all private loans prior to disbursement and students’ loan limits are determined by the school Cost of Attendance (COA) for their program.

17. Scholarships: Once a student has started school, scholarships will be disbursed into the student account according to scholarship guidelines.

18. Federal Financial Aid Return of Title IV Funds Policy: If a student receives Title IV aid (federal student loans, Pell Grant, FSEOG) and withdraws prior to the 60% point of the term, repayment of a portion of those funds is required.
NOTICE OF INSTITUTIONAL FINANCIAL AID ON-CAMPUS RESIDENCY REQUIREMENT

All Holy Cross College students are strongly encouraged to participate fully in the life of the college. Underclassmen in particular may best reach this goal by living in a Holy Cross College residence hall. While all students are strongly encouraged to live in the residence halls, there is no requirement to do so, with one exception. Students who receive 50% or more of their tuition and fees expenses in aid from the college in the form of scholarships and grants are required to live in college residence halls for all semesters that such aid is received. In this way, students for whom the college makes a significant financial commitment shall in turn commit to contributing in a meaningful way to the life of the college.

Students wishing to be relieved of this obligation may request a waiver. This waiver, which the student must submit in writing to the Dean of Students no later than 2 weeks after receipt of a Financial Aid package, must outline a compelling reason why such a waiver should be considered.

Students receiving institutional aid in excess of 50% of tuition and fees, who leave the residence halls either by their own choice, or due to a disciplinary matter shall expect a reduction in their institutional aid, and will be subject to all applicable charges as outlined in the housing contract and student handbook.
PARTICIPATION IN FINANCIAL AID PROGRAMS

The Office of Financial Aid participates in financial aid programs funded through a variety of sources. Types of assistance include scholarships, grants, loans and work opportunities. Scholarships and grants are gift awards which generally do not have to be repaid. Scholarships may be merit or need based. Grants are based on financial need. Work opportunities are considered self-help awards in which performance of duties are required. Work programs provide on or off-campus employment with hourly pay meeting minimum wage requirements or more. The type of aid awarded depends upon the student’s financial need and is generally a combination of gift and self-help assistance.

As a private nonprofit institution, HCC has been authorized by the United States Secretary of Education to participate in financial aid programs authorized by Title IV of the Higher Education Act of 1965 as amended. The programs listed below are those in which HCC bears some responsibility in administering. Descriptions and eligibility requirements of each program are found in the federal publication for federally funded programs.

The Program Participation Agreement between HCC and the USDE entitles the Financial Aid Office to participate in the following federal programs:

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

HCC also participates in the following Indiana state-funded programs (available to residents of Indiana only):

- Frank O’Bannon Higher Education Award
- Frank O’Bannon Freedom of Choice award
- 21st century scholars program
- 21st century scholars GEAR UP scholarship

HCC also manages a small amount of endowed scholarship that is awarded by a scholarship committee. Awards from other sources are used in computing the total aid package for students. Those agencies also include but are not limited to Veterans’ Administration, Indiana Division of Vocational Rehabilitation, Dislocated Worker Program.

Current federal, state and institutional regulations, policies and guidelines are followed in awarding and disbursing aid from all financial aid programs in which we participate.

PROCESSING STUDENT AID REPORTS

The Financial Aid Office participates in the Electronic Data Exchange (EDE) with the USDE. Student information from the FAFSA and the processed results, the Institutional Student Information Record (ISIR) containing the official EFC are imported on a daily basis. Correction of a data element requested by students or required as a result of verification or other review, is processed and submitted electronically to the USDE/CPS. Within approximately 72 hours, a new official EFC is delivered back
to the Office of Financial Aid. Processing of the ISIR is continued and an award, if eligible, is made.

STUDENT BUDGETS AND COST OF ATTENDANCE

STUDENT BUDGETS
Student budgets are an integral component in the financial aid equation. Standard student budgets reflecting the average student population cost of attendance at a modest, but adequate standard of living are used to award financial aid.

The Director of Financial Aid collects information to prepare standard costs on an annual basis. All costs are based on limitations to the amounts and other criteria set forth in the federal regulations.

DIRECT COSTS
Tuition costs are determined by HCC and approved by the Board of Trustees. An average of tuition cost for students is used to determine the exact tuition cost for the standard budget. Fee costs are determined by the institution, based on program-specific needs.

INDIRECT COSTS
Indirect costs consist of the following types of expenses incurred by students: books, supplies, room and board, transportation and miscellaneous items. Room and board expenses are divided into 4 categories: living with parents, living on-campus, living off-campus and independent student. Miscellaneous items include personal expenses for clothing, toiletries, medical/dental, recreational, and other miscellaneous expenses.

Upon request, aid officers may review, and if appropriate, adjust a student's budget. Students should submit an Unusual Circumstance Appeal form attaching appropriate documentation.

Examples of changes to standard budgets include, but are not limited to:
1. Child care – the cost of child care for students with dependent children may be added to a standard budget.
2. Excessive medical expenses that are not covered by insurance or any other source.
3. Out-of-pocket tuition expense at private elementary or secondary schools for children.
4. Special program costs – some of HCC’s programs of study (e.g. global experience) require additional expenses that are above the average cost included.

VERIFICATION
Verification is the process of confirming the accuracy of student reported data on financial aid applications. Typically, the USDE selection criteria translate into verifying 30 percent of the financial aid population. The school has the authority – and may be required – to verify additional students. Students may be selected for verification if there is a discrepancy or a condition which is unusual and warrants investigation.

The Application and Verification Guide published by the USDE is used as a reference for verification requirements.

HCC only initially verifies students in which the USDE selected for verification. However, students may be asked to provide additional information if further investigation is needed to resolve a discrepancy.
Upon receipt of the electronic Institutional Student Information Record (ISIR), a Document Tracking Letter is automatically generated for any student who is selected for verification according to the federal selection criteria. This letter informs the student of additional information which is required to complete the financial aid application (verification form, student and parent tax returns, etc.).

Students are notified that until the missing items are submitted to the Financial Aid Office, additional processing of their file is put on hold. Required documentation items are identified and receipt date is maintained on the financial aid software. Once the items are received, the file is routed to the Financial Aid Representative or Director for verification. Documentation submitted to the Financial Aid Office must be legible, appropriate, and have the student's ID number for identification purposes. If the student submits a document which is not legible, the document will be returned and appropriate documentation will be requested.

Students who fail to submit verification documents will not be awarded financial aid.

Students are notified that they are selected for verification on the SAR. The document tracking letter also indicates to the student that he/she has been selected for verification. When the corrected ISIR is received, final review of the file takes place and an award is made, if applicable.

Because the Financial Aid Office is liable for disbursements made prior to verification, it is the policy of the office not to award nor disburse funds until verification is complete. HCC’s policy does not allow interim disbursements. Students must complete the verification process before aid is awarded or disbursed.

Financial Aid Office policies and procedures are designed to eliminate the possibility of an overpayment from any fund. If, however, an overpayment does occur, a stop order is placed on the student’s records by the Financial Aid Office and a letter is sent to the student. Students are not allowed to register for subsequent terms and academic transcripts are withheld until the account has been cleared.

AWARDING FINANCIAL AID

The Financial Aid Office has developed an institutional packaging philosophy to ensure consistent, equitable and fair distribution of financial aid funds. HCC’s policy is to provide the financial aid needed to each applicant to ensure that a degree or program will be completed; to minimize the adverse effects of financial concerns on academic performance; to provide the most advantageous combination of aid funds for which the student qualifies (subject to the availability of funds); and to make maximum use of all financial aid funds available to the institution.

HCC ACADEMIC YEAR DEFINITION

All Semester programs, 30 credits in 30 weeks

GENERAL PACKAGING GUIDELINES

Once a student file is marked complete, the Financial Aid Director and staff will award aid in the EMPOWER System.

- Determine if there are any outside resources (i.e. scholarship/s).
- Determine Pell Grant eligibility.
- Determine eligibility for other aid in this order: grant, scholarship.
- Award federal loans.
• Not all funds awarded to students will be expended because students may not enroll, may withdraw, or may decline a portion of their award.

RESOLVING CONFLICTING INFORMATION
HCC financial aid officers are responsible for resolving any discrepancies between a student’s FAFSA and other information of which the school becomes aware. If information is received from any source that conflicts with the information provided on the FAFSA, it must be verified and updated if necessary. If for any reason an income or tax document is submitted, PTI will review the information for possible conflicts with the applicant’s FAFSA responses.

DETERMINATION OF TOTAL FUNDS TO BE AWARDED
The Director determines the total aid funds to be awarded during an award year. The USDE sends the Financial Aid Office information detailing annual fund allocations for Campus-Based Funds through the Federal Authorization Letter with the Official Notice of Funding. Federal Pell Grant Payment Schedules and Federal Loan Limits are determined by USDE and the school is notified annually. Institutional scholarships are awarded on the student award letter and are to be utilized for tuition only.

OUTSIDE RESOURCES
Students are encouraged to seek assistance from outside resources. It is required that all outside assistance be reported to the Financial Aid Office. Student aid including outside resources, may not exceed the student's cost of attendance. Therefore, if a student has been awarded funds by the aid office and receives an internal or outside award later, an adjustment to the original award letter may be necessary. If an adjustment is necessary, the outside aid will always replace self-help aid if possible.

AWARD LETTER AND ACCEPTANCE OF AWARDS
Students receive notice of financial aid via an award letter. Students sign and return their award letter to HCC, accepting or declining each award.

FEDERAL SUPPLEMENTAL EDUCATIONAL OPPORTUNITY GRANT
FSEOG funds are very limited and are awarded by HCC to Pell-eligible students who show financial need as indicated on the SAR. First priority is given to those students with 0 EFC.

OVER-AWARDS
If a potential or actual over-award is discovered, USDE guidelines regarding over-awards will be followed. Other aid that may need adjusting to prevent an over-award will be done in the following order, first to last: Loan, FSEOG, Scholarships.

REVISION OF FINANCIAL AID AWARDS
Once an award letter is sent to the student, there may be instances which warrant a change to the original notification. An aid administrator may review a student’s circumstances, make an adjustment to an award and release a revised award letter. This revised award invalidates the original award notice. Enclosures with the award letter acknowledge the right of the Financial Aid Office to make a change to any award.

REVISION INITIATED BY THE FINANCIAL AID OFFICE
The Financial Aid Office will automatically consider a revision in a student’s aid package when the following occurs:
• There is a presence of conflicting information within the file.
• There is a change in availability of funds.
• There is a Financial Aid Office error.

Students are sent a revised award letter as soon as possible with highlighting the change. In the case of an office error, it is customary to contact the student personally, or send a personalized letter.

REVISIONS INITIATED BY REQUEST FROM STUDENT
It is the student’s responsibility to notify the Financial Aid Office of changes in a student’s resources and/or circumstances. The student may notify the Financial Aid Office of such an instance that affects the student’s family contribution by completing an Unusual Circumstances Appeal along with any documentation to validate the change in circumstances. If a change to the award is allowed, the aid administrator will release a revised award letter.

OVER-AWARDS
An over-award occurs any time a student’s financial aid (federal, institutional, state and outside aid) and other resources exceed the demonstrated financial need for the award period by more than an allowable tolerance (currently $300).

ELIMINATING AN OVER-AWARD
Before reducing a student’s aid package because of an over-award, an attempt should always be made to reduce or eliminate the over-award. Two methods are:
1. Increase cost of attendance budget using allowable expenses.
2. Adjust undisbursed funds.

CAUSES OF AN OVER-AWARD AND/OR OVER-Payment
There are several causes of an over-award/over-payment:
1. Student wages – the student earns more than the awarded FWSP funds.
2. Change in the enrollment status.
3. Additional resources – the student has resources greater than those originally used to calculate the award.
5. Fraud – the student intentionally deceives or misrepresents information to obtain funds.

TREATMENT OF AN OVER-AWARD
If eliminating the over-award is not possible, the aid administrator must reduce the over-award using the following sequence:
1. An over-award from administrative error must first reduce or eliminate next term’s overpayment and then bill the student for any remaining amount.
2. If an over-award occurs due to fraud, follow the procedures outlined by the USDE.

OVER-Payment
Over-payments occur when a student receives aid that exceeded his/her eligibility. This can result from misreporting information on the FAFSA, cost of attendance miscalculations, paying ineligible students, disbursing aid in excess of maximum limits.
The aid administrator must reduce the over-payment using the following sequence:
1. An over-payment from administrative error must first reduce or eliminate next term’s overpayment. Then bill the student for any remaining amount.
2. If an over-payment occurs due to fraud, follow the procedures outlined by the USDE.

AWARDING FEDERAL WORK STUDY

FEDERAL WORK STUDY
FWS is an award that is disbursed as payroll for hours that a student works in a position that the school has identified as one that meets USDE’s requirements. The FWS award is used to compensate the student for educational expenses while in school.

FUND MAINTENANCE
The bank account for the FWS program will be the same account used for Pell and other campus-based funds. The awards from and refunds to the fund should be identified per student, rather than in lump sum amounts. This is a match award. HCC matches 25% of the student’s gross FWS wages.

AWARDING
The student’s award is based on financial need. Cost of attendance minus EFC minus EFA = financial need. Packaging is based on net earnings, after taxes and job-related costs are subtracted. Students will apply for FWS job openings that will be posted in the Financial Aid Office. FWS jobs can be on campus or off campus. HCC offers off-campus work study jobs with federal, state, or local public agencies or private non-profit organizations that serve the public interest. Each position has a job description. Students must complete I-9 and W-4 forms. The student’s need, number of hours per week the student can work, the period of employment, the wage rate, and the amount of other assistance for the student will be considered when determining eligibility. A transfer of up to 25% of FWS can be made to both FSEOG and Perkins. Seven percent of the school’s federal authorization must be used in a community service position. Of the 7%, at least one student must be placed in a reading tutor or family literacy position. PTI’s off-campus positions will be community service work study jobs.

DISBURSING
The students are paid with a payroll check for the total amount of the hours worked and USDE reimburses the school 75% of the payroll amount unless there is a different matching amount based on the student’s employment. For instance, community service jobs are reimbursed at 100%.

WORK STUDY STUDENTS’ ACCESS TO EDUCATIONAL RECORDS
Work study students’ access to educational records is a concern at HCC. Work study students can be granted access to personally identifiable information in the educational records of other students for the limited purpose of performing tasks assigned by and under the supervision of an educational official with whom the college has determined to have a legitimate educational interest in the educational records of students. Work study students who are assigned tasks dealing with educational records of other students will receive instruction on the college’s policies and procedures concerning access to student educational records, and will review and sign a HCC Confidentiality Policy. They will also be advised that
information contained in the educational records of other students is confidential and must not be discussed or shared with anyone other than their immediate supervisor.

**FEDERAL LOAN COUNSELING**

*Entrance loan counseling* is completed by the student who is borrowing federal direct loans. The entrance loan counseling is completed online via the federal website of: [www.studentloans.gov](http://www.studentloans.gov). In the event the student is not able to do so online, a paper version of the entrance counseling can be obtained at the Office of financial aid.

*Exit loan counseling* is completed by the student who is borrowing federal direct loans. The exit loan counseling is completed online via the federal website of: [www.studentloans.gov](http://www.studentloans.gov). In the event the student is not able to do so online, a paper version of the entrance counseling can be obtained at the Office of financial aid. If a student withdraws, he/she will be notified to complete the same procedure. If the student is not available, a letter is sent along with booklet Exit Counseling Guide for Direct Loan borrowers requesting the student to return the Student Contact Information Sheet and federal loan history printout from NSLDS is also included.

**PROFESSIONAL JUDGMENT**

The Higher Education Act of 1992 allows financial aid administrators to make professional judgment decisions when there are special or unusual family or student circumstances that may call for adjustments in determining a student’s eligibility for financial aid. Circumstances requiring professional judgment must be analyzed on a case-by-case basis. These circumstances must be documented.

Professional judgment adjustments may increase or decrease a student’s EFC or cost of attendance. Specified adjustments may be made to data elements, but not to the formula. Adjustments made will apply to all institutional, state and Title IV aid awarded.

Circumstances which may warrant a professional judgment decision include, but are not limited to the following:

- A change in income of the student’s family that would affect the family’s ability to pay for college expenses. Examples would be loss of employment, loss of untaxed benefits, a separation or death.

  Documentation required: verification of change, examples listed on Unusual Circumstance Form.

- Student requests consideration as an independent student.

  Documentation required: verification of change, examples listed on Unusual Circumstance Form.

- Excessive medical expenses. Documentation required: Verification of medical expenses paid by family from doctors, hospitals, etc. or copy of tax return verifying itemized deductions, showing medical expenses.

  The required documentation listed for each of these circumstances explains what information is necessary for each situation. The documentation must be complete before approval will be considered. Documentation of professional judgment decisions will be maintained in the student’s folder.
Professional judgment situations are unique. Circumstances other than those listed may be considered and will require documentation specific to the situation. The Director of Financial Aid has the final authority to make professional judgment decisions.

**REFUND/REPAYMENTS**

The full HCC refund policy is found in the school catalog. Up through the 60% point in each payment period or period of enrollment, a pro-rata schedule is used to determine how much FSA Program funds the student has earned at the time of withdrawal. After the 60% point in the payment period or period of enrollment, a student has earned 100% of the FSA Program funds.

The amount of financial aid earned is the percentage of aid earned multiplied by the total amount of aid that was disbursed for the payment period or period of enrollment as of the day the student withdrew.

1. If the day the student withdrew occurs on or before the student completed 60% of the payment period or period of enrollment for which the assistance was awarded, the percentage earned is equal to the percentage of the payment period for which assistance was awarded that was completed.
2. If the day the student withdrew occurs after the student has completed greater than 60 percent of the payment period or period of enrollment, the percentage earned is 100%.

The percentage of the payment period or period of enrollment completed is determined by calculating the total number of calendar days in the payment period divided into the number of calendar days completed in that period as of the day the student withdrew.

**FUNDS WILL BE RETURNED IN THE FOLLOWING ORDER:**

1. Unsubsidized Federal Stafford Loans
2. Subsidized Federal Stafford Loans
3. Perkins Loans
4. Federal/Direct Plus Loans
5. Federal Pell Grants
6. FSEOG

**Refunding State Need Grants**

In this case the institutional policy is applied.

**Institutional Scholarships** – the Return to Title IV calculation is used to determine the withdrawal status.

**Work study funds** are paid for work performed and no repayment is required.

**OUTSTANDING STUDENT ACCOUNTS**

Students are not allowed to register for further classes if they have an outstanding account. If an exception is made, and the student is eligible to receive assistance from any type of funds, the financial aid funds would be applied through credit to the student’s account (in compliance with federal guidelines regarding this issue, if federal funds are involved). If this does not satisfy the debt, the student would be required to repay the balance immediately or further collection measures would be taken.
RETURN OF TITLE IV FUNDS

The Registrar notifies the Financial Aid Office of all withdrawals. The Financial Aid Office will use the last day of attendance on the withdrawal form as indicated by the registrar in determining the percentage of the pay period the student completed. The Financial Aid Office will use the worksheet on FAA Access (USDE website) to determine the required repayment from the institution and student. The Federal Return of Title IV funds formula (R2T4) dictates the amount of Federal Title IV aid that must be returned to the federal government or the lending institution by the school and/or the student. The federal formula is applicable to an eligible student receiving federal aid when that student withdraws on or before the 60% point in time in the payment period. After R2T4 is done and refunds are made, HCC completes an institutional refund calculation that determines if the student owes the school any money or there is an additional refund due. The student is then billed for any amount owed to the school. If there is an additional refund it will be returned to the student unless the student gives HCC permission to return to USDE to reduce federal loans.

If a student receives less Title IV funds than the amount earned, the school will offer the student a disbursement of the earned aid that was not received at the time of his/her withdrawal which is a post withdrawal disbursement. Post withdrawal disbursements will be made from Pell grant funds first if eligible. If there are current educational costs still due the school at the time of withdrawal, a Pell grant post withdrawal disbursement will be credited to the student’s account. Any Pell grant funds in excess of current educational costs will be offered to the student. Any federal loan program funds due in a post withdrawal disbursement must be offered to the student and the school must receive the student’s permission before crediting their account. Refunds will be made to the federal programs within 45 days of the student’s date of determination.

Institutional Refund of Charges Policy for Non-Title IV Recipients

<table>
<thead>
<tr>
<th>Policy on Institutional Refund of Charges</th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of Full Weeks Attended</td>
</tr>
<tr>
<td>1st week</td>
</tr>
<tr>
<td>2nd week</td>
</tr>
<tr>
<td>3rd week</td>
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<tr>
<td>4th week</td>
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<tr>
<td>After 4 weeks</td>
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</tbody>
</table>

A student's attendance in the term is counted from the first required day of attendance until the date of the student's official withdrawal. The Business Office will calculate this refund. (Please refer to the table above.)
SATISFACTORY ACADEMIC PROGRESS REQUIREMENTS FOR FINANCIAL AID RECIPIENTS

Definition:
The purpose of the Satisfactory Progress Policy is to ensure that students receiving federal and state financial aid, progress satisfactorily toward completion of their degree. In order to maintain eligibility for federal and state aid, a student must meet the Satisfactory Progress Requirements listed below. The aid programs affected by the Satisfactory Progress Policy are:
Federal Pell Grant
Federal Supplemental Education Opportunity Grant (FSEOG)
Federal Work-Study Program
Federal Direct Subsidized and Unsubsidized Loans
Federal parent PLUS Loan
**THIS POLICY APPLIES TO ALL CREDIT HOUR COURSES INCLUDING DEVELOPMENTAL COURSES AND ANY GRADES GIVEN AMNESTY THROUGH THE ENROLLMENT SERVICES OFFICE.**

Satisfactory Progress Requirements
01. All students must meet the following minimum percentage credit hour completion requirement each semester.
   1 to 120 cumulative credit hours attempted (or as many needed for a degree up to 180 credits) - 67% or 10 minimum credits successfully completed each semester (whichever is higher) is required to be on track for earning a degree.
   The total number of attempted credit hours for each semester is multiplied by 67%, depending on the student’s cumulative credit hours attempted*, including developmental courses. This number represents the minimum number of credit hours the student must complete that semester.
   * Attempted hours include all past ECC credits and current term credits.
Example A: A new student who begins fall semester with 15 credit hours must complete a minimum of 10 credit hours that semester.
   15 credit hours X .67 (67) = 10.0 credit hours. If a student is enrolled for 12 credits, he or she is not allowed to drop below 10 credits at the end of a term. If he or she does, they will be in financial aid probation.
   NOTE: To complete credit hours means to receive a grade of A, B, C, D or S. Grades of F, FA, U, and W are considered non-progress grades and may cause financial aid ineligibility.
   Transfer hours from other institutions are excluded.
02. All students must maintain a minimum grade point average each school year.
   The student’s cumulative grade point average (GPA) will be monitored at the end of each school year to ensure the following minimums are met:
   Cumulative Credit Hours Attempted Minimum Cumulative GPA 2.0
   The student is also required to maintain a minimum 2.0 GPA for each semester as well.
   NOTE: The cumulative GPA will include all developmental courses and courses dropped after the 100% refund period. Transfer hours from other institutions are excluded.
03. All students must complete their degree within 150% of the credit hours required for their officially-declared degree (150% rule).
   The credit-hour maximum will consider all HOLY CROSS COLLEGE credit hours. The credit-hour maximum will consider transfer hours from other institutions. All HOLY CROSS COLLEGE hours are considered even if federal and state aid was not
received during some semesters. (A Financial Aid student may officially declare only one degree at a time.)

Financial Aid Warning and Ineligibility Status
A student’s satisfactory progress will be monitored at the completion of each semester to determine if all three of the Satisfactory Progress Requirements have been met. If the first and/or second requirement has not been met, the student will receive a warning letter explaining the student’s warning status. Upon completion of each subsequent semester the student’s satisfactory progress will again be reviewed. If any one of these three requirements has not been met for any subsequent semester, the student will receive a letter of ineligibility explaining the student’s ineligible status and federal and state financial aid will be canceled. Note: The student will receive an ineligible letter when the maximum allowable hours have been attempted regardless of prior SAP status. There will be no “warning” prior to this maximum ineligible status.

To Regain Eligibility
If special circumstances exist, the student may submit a written appeal explaining his/her reasons for not meeting the Satisfactory Progress Requirements and provide appropriate third party documentation. The written appeal will be reviewed by the Director of Student Financial Aid and, if the appeal is accepted, eligibility for federal and state aid will be reinstated. OTHERWISE:
Students must meet the minimum percentage credit hour completion requirement of the term when ineligibility was determined, and/or the minimum grade point average requirement without the use of federal and state aid. Upon completion of these requirements, the student must notify the Student Financial Aid Office to request review of the SAP status and eligibility for aid.

NOTE:
01. When appealing, it may be necessary to address failure to meet the policy in more than one area of the SAP policy.

02. When appealing, there may be an occasion to address the lack of progress in more than one term.

AUDITS AND PROGRAM REVIEWS
Federal regulations require a FSA compliance audit every fiscal year. Each audit must cover the time period since the last audit. HCC’s fiscal year ends June 30, and is audited annually by a private auditor. Auditors review a sample of student files to ensure the Financial Aid Office is in compliance with federal, state and institutional policies. Any exceptions found during the audit will be addressed. The auditor then submits an Independent Auditor’s Report including any findings to HCC and the HCC Board of Trustees. An electronic version of the audit is sent to HCC from the auditors and the CFO uploads it to the government using the online submission site of eZ-Audit. Federal reviews are conducted by the USDE on a basis determined by the department.
Preparation for the audit is done in cooperation with the auditor’s requests. Typically, the auditors will randomly select a specific number of students from each of the Title IV programs. The files are pulled and given to the auditors. Any additional assistance requested is responded to promptly. A complete listing of financial aid audit guidelines is listed in the Audit Guide published by the USDE. See this reference document for additional information.

FRAUD
There are difficult situations where students and/or parents purposefully misrepresent information in hopes of obtaining aid or obtaining additional assistance. The Financial Aid Office is required to have a policy of referral when confronted with actual or suspected cases of fraud and abuse.

POLICY FOR FRAUD
Students and parents who willfully submit fraudulent information will be investigated to the furthest extent possible. All cases of fraud and abuse will be reported to the proper authorities.

PROCEDURES FOR FRAUD
If in an aid administrator’s judgment, there has been intentional misrepresentation, false statements, or alteration of documents which have resulted or could result in the awarding or disbursement of funds for which the student is not eligible, the case shall be referred to the Director for possible disciplinary action. After investigating the situation, if the Director believes there is a fraudulent situation, all information must be forwarded to the Office of Inspector General of the USDE or the local law enforcement agency.

The Director of Financial Aid reviews the student’s aid file with the appropriate aid administrator and if the decision is made by the Director to pursue the possibility of denying or canceling financial aid, a written request to make an appointment is to be sent to the student. If the student does not make an appointment, the Director may:

- Not process a financial aid application until the situation is resolved satisfactorily.
- Not award financial aid.
- Cancel financial aid.
- Determine that financial aid will not be processed for future years.

All processing of the application or disbursement of funds shall be suspended until the Director has made a determination as to whether the student shall be required to make an appointment.

Fraudulent situations should be reported to the hotline of the Department of Education Inspector General at (404) 562-6460 or (800) 647-8733.
Financial Aid Office Code of Conduct

The Higher Education Opportunity Act (HEOA) of 2008 requires institutions of higher education to develop and enforce a code of conduct that prohibits conflicts of interest for financial aid personnel. In accordance with this requirement, Holy Cross College has established the following code of conduct. Any questions regarding interpretation of, or definitions used in, this Code of Conduct should be interpreted based on the HEOA of 2008.

This policy applies to all employees who work in the Financial Aid Office and all other College employees, officers and agents who have responsibilities with respect to education loans.

Conflict of Interest
No employee shall have a conflict of interest with respect to any education loan or other student financial aid for which the employee has responsibility. Employees may not process any transaction related to their own personal financial aid eligibility or that of a relative.

Ban on Revenue Sharing Arrangements
Holy Cross College has not, and will not in the future, enter into any revenue-sharing arrangements with any lender.

Gift Ban
Employees or their family members may not solicit and/or accept any gifts from lenders, guarantors, or servicers of education loans. A gift to a family member of an employee or to another individual based on that individual's relationship with an employee shall be considered a gift to the employee if the gift is given with the knowledge and consent of the employee, and the employee has reason to believe the gift was given because of the employee's position at the College. The College will not accept any marketing gifts from lenders but may accept and distribute educational materials regarding banking services (excluding student loans).

Prohibition on Contracting
Employees who work in the Financial Aid Office or who have responsibilities related to education loans may not accept from any lender or lender affiliate any fees, payments, or other financial benefit as compensation (including the opportunity to purchase stock) for any type of consulting arrangement or other contract to provide services to a lender relating to education loans.

Interaction with Borrowers
The College does not assign a first-time borrower's Federal Family Education Loan (FFEL) to a particular lender. The College will also not refuse to certify, or delay certification of, any federal loan based on the borrower's choice of lender or guaranty agency.

Prohibition on Offers of Funds for Private Loans
Holy Cross College does not request or accept from any lender an offer of funds to be used for private education loans in exchange for promises to the
lender with regards to the number of loans made, specific loan volume or preferred lender arrangement.

Co-branding
The College will not permit a private educational lender to use the College's name, emblem, logo or any other words, pictures or symbols associated with the College to imply endorsement of private education loans by that lender.

Ban on Staffing Assistance
The College will not request or accept from any lender any assistance with call center staffing or financial aid office staffing. However, nothing in this section prevents the College from accepting assistance from a lender or guarantor in regards to: professional development training for College staff, providing educational counseling materials, financial literacy materials or debt management materials to borrowers.

Advisory Board Compensation
No employee who serves on an advisory board, commission or group established by a lender, guarantor, or group of lenders or guarantors may receive anything of value from the lender, guarantor, or group of lenders or guarantors in return for that service.

Reimbursement of Expenses
Expenses incurred while attending professional association meetings, conferences, or in connection with service on an advisory board or commission must be paid by the College. Payment for entertainment expenses may also not be accepted from any lender, guarantor or servicer. Meals offered as part of meetings, conferences, professional development activities or other events may be accepted if all participants in the meeting or event are offered the meals, or if the meals are included as part of the registration fee.