

Policy: **Administrative Capability**
Regulation: [668.16](#)

Purpose: Document the responsibilities of the various offices with respect to the approval, disbursement, and delivery of Title IV, HEA program assistance, and the preparation and submission of reports to the Secretary.

Scope: **Specifically Address**

- 1.1 Adequate number of qualified person(s) to administer the Title IV Programs
- 1.2 Adequate Checks and Balances
- 1.3 Satisfactory Academic Progress
- 1.4 Conflicting Data
- 1.5 Fiscal Reports and Financial Statements
- 1.6 Financial Aid Counseling

Responsibilities:
(Identify individuals and/or offices responsible for developing and updating this section)

INSTITUTIONAL ORGANIZATION:

Bishop State Community College is one of the many community, junior, and technical colleges in Alabama which are supervised by the Chancellor of the Postsecondary Education Department. The Chancellor is responsible directly to the Alabama State Board of Education. The President of the College is appointed by the State Board of Education, and is directly responsible for its total operation. In addition, the President employs or recommends all personnel for employment.

The Dean of Finance reports directly to the President and is responsible for all fiscal operations, maintenance, and financial aid services and functions. The FAA reports directly to the Dean of Finance.

THE FINANCIAL AID, ADMISSIONS, BUSINESS OFFICE (FAAB) COMMITTEE

This committee serves as an advisory board for Financial Aid Assistance Programs. The committee's 2009-2010 membership consists of the following persons:

Dr. Chuks, Samuel - Financial Aid Manager, Chairperson	7021	schuks@bishop.edu
Ms. Bonita Allen - Dean of Finance	7295	ballen@bishop.edu
Ms. Daniels, Wanda – Admissions	7003	wdaniels@bishop.edu
Mr. Urbanek, Phillip – Admissions	7006	purbanek@bishop.edu
Ms. Payne, April – Business Office	7048	apayne@bishop.edu
Ms. Giles, Mamie – Business Office	7023	mgiles@bishop.edu
Ms. King, Audrey – Financial Aid	7016	aking@bishop.edu
Dr. Odom, Roxanne – Academic chair	7254	rodom@bishop.edu
Mr. Runderson, marshall – Technical Instructor	665-4110	mrunderson@bishop.edu
Ms. Foster, Yvonne – Counselor	405-4429	yfoster@bishop.edu
Marty Forsyth – Director of Computer Services	7071	mforsyth@bishop.edu

The specific functions of the committee are as follows:

1. To review and approve recommendations for changes in financial aid, admissions, and business office policies and procedures, when needed.
2. To monitor and oversee financial aid activities at the College.

THE SCHOLARSHIP COMMITTEE

This Committee reviews all applications for academic scholarships and makes recommendations to the President. The Committee is also responsible for securing additional scholarships and for Fellowship funds. This Committee reports to the Dean of Students and to the President. In addition, all scholarships are coordinated through the Financial Aid Office.

Definitions:

(Identify acronyms or definitions that will be used in this section)

See Appendix A

Resources available to assist in the development of a manual:

- Complete Conflicting Data Activity #4 in the FSA Verification Assessment.
<http://ifap.ed.gov/qadocs/FSAVeriModule/activity4verif.doc>
- Satisfactory Academic Progress (SAP) At a Glance
<http://ifap.ed.gov/qadocs/SAPModule/SAPExamples.doc>
- Financial Aid Counseling
<http://ifap.ed.gov/qadocs/DefaultManagement/DefaultPreventionFedReq.doc>
- Complete Fiscal Management Assessment
<http://ifap.ed.gov/qahome/qaassessments/fiscalmanagement.html>
- Review the [2009-10 FSA Handbook](#) (Application and Verification Guide, Volumes 1, 2 and 4) for guidance related to the topics in this section

1. List the offices involved in approving and Disbursing Title IV Aid. Provide a short description of each office as indicated (If other offices are involved at your school and are not listed below, include descriptions of those offices as well):

Academic or Education Personnel/Registrar and Admissions Personnel:

Employee job duties and staff functions - Admit students; evaluate transfer credits and ACG eligibility; Capture and manage attendance verification, process withdrawals, drop/add classes, grades; Maintain admission documents – applications, transcripts, etc.; Participate in No-Show Appeal process;

Institutional communication (how the Registrar communicates with other institutional offices) primarily via email and administrative software

Financial Aid Personnel:

Employee job duties and staff functions –

The financial aid staff at Bishop State Community College is responsible for administering all student financial aid programs. Additional staff persons will be required based on enrollment increases.

1. **Manager of Student Financial Aid Services (FAA)** - is responsible for administering and coordinating all aspects of the student assistance programs--according to institutional policies and procedures and in the best interests of students. Some specific functions are as follows:
 - a. Ensure that proper records and documents are maintained in order to meet institutional and federal statutory requirements.
 - b. Review applications and materials and select applicants for financial aid based on need according to financial aid policy.
 - c. Provide counseling to students regarding their need for financial aid and funds management.
 - d. Prepare and submit the required reports and documents to the U. S. Department of Education and other appropriate agencies.
 - e. Develop annual financial aid budgets which determine the costs of attending Bishop State Community College.
 - f. Supervise the office staff and maintain a program for staff training, program planning, and budget controls.
2. **The Director/Advisors**- The Director and Advisors are responsible directly to the manager for administering and coordinating assigned phases of the Student Assistance Programs. Some specific functions are as follows:
 - a. Receiving and processing students' Institutional Student Information Record (ISIR) Process Applicants for the Federal Pell Grant, the Federal Work-Study (FWS), the Federal Supplemental Educational Opportunity Grant (FSEOG); and the Alabama Student Assistance Program (ASAP); and applications for Veterans Benefits.
 - b. Assisting in preparation and submitting of reports and documents to the U.S. Department of Education and other appropriate agencies.

- c. Maintaining accurate files for financial aid applicants/recipients and ensuring that all required information is filed.
 - d. Assuring that work-study students job descriptions are prepared; and work-study assignments are made.
 - e. Packaging and mailing award letters; preparing letters /statements requested by students upon request.
 - f. Assisting as needed in answering office telephones and receiving office callers; keeping the office operating in a professional manner at all times;
 - g. And other duties assigned, as it relates to Financial Aid.
3. **Financial Aid Counselor/Veterans Coordinator** - To serve as veterans Coordinator and assist the Manager of Student Financial Services in developing and implementing a comprehensive program and other functions as needed.
- a. Coordinate activities with the Manager of Student Financial Services for veterans' participation in federal aid, deferred tuition, and other student financial assistance programs.
 - b. Process veterans' applications for VA benefits; develop cordial working relationships with the Regional Office of the Veterans Administration (particularly the adjudication officer and the State Approving Agency (SAA)).
 - c. Coordinate veterans programs and activities with college officials relative to enrollment procedures that affect VA payments to students; ensure the accurate and timely processing and submission of VA reports, students' schedules, and other VA documentation
 - d. Assure that current copies of the college's catalogs and other publications containing descriptions of programs and courses of study are immediately submitted to the S M (State Approving Agency).
 - e. Submit new program curriculum outlines and courses of study not included in the college catalog to the SAA immediately upon establishment by the institution (38 U.S.C. 1775 and 1776); maintain current lists of approved programs.
 - f. Assume accountability for all activities as VA coordinator--the accurate and timely submission of students' applications and schedules, organization and maintenance of files, keeping up to date on current VA regulations, and attending VA training seminars and workshops.
 - g. Select, hire and supervise qualified VA Work-Study Students.
 - h. Review, approve, and process students' financial aid applications and materials.
 - i. Counsel students concerning packaging financial aid awards, work study performance required documentation, and payroll procedures.
 - j. Assist as needed with data-input, filing, and other functions for total effectiveness in the Financial Aid Office.

Institutional Communication (how the Financial Aid Office communicates with other institutional offices) primarily via email and administrative software

Fiscal Office Personnel:

Employee job duties and staff functions – Disburse approved financial aid refunds; Reconcile financial aid disbursements with amounts awarded by FA office; Assist in R2T4 calculations; Participate in No-Show Appeal process; Receipt approved student financial assistance to the student's account during registration

Institutional Communication (how the Fiscal Office communicates with other institutional offices) primarily via email

Campus Security Personnel:

Employee job duties and staff functions – Provide on campus security; Submit annual security report; Manage parking activities;

Campus Police are responsible for maintaining crime log and submitting Annual Campus Security report.

Institutional Communication (how the Campus Security Office communicates with other institutional offices) primarily via email

2. **Number and distribution of financial aid staff:** 6 counselor/advisors, 3 clerical, 1 manager

3. **If applicable, document the use of third-party servicers to aid in the administration of Title IV Aid (e.g., ATB independent test administrator, Perkins Loan servicer):** NA

4. **Select types of program(s) in which the institution participates:**

- | | |
|--|--|
| <input checked="" type="checkbox"/> Federal Work Study | <input checked="" type="checkbox"/> Federal SEOG |
| <input type="checkbox"/> Federal Perkins | <input checked="" type="checkbox"/> Federal Pell |
| <input type="checkbox"/> National SMART | |
| <input type="checkbox"/> TEACH Grant | <input type="checkbox"/> FFEL |
| <input type="checkbox"/> Direct Loan | <input type="checkbox"/> Grad PLUS |
| <input type="checkbox"/> Other | <input type="checkbox"/> Other |
| <input type="checkbox"/> Other | <input type="checkbox"/> Other |

5. **Number of Financial Aid applications evaluated:**

2012-2013 ISIRs with BSCC school code – 6939

6. **Number of students who receive Title IV assistance and the amount of funds administered:**

2012-2013 disbursements – \$11,434,156.69

7. **Type of financial aid delivery system used by the institution:**

Paper check and direct deposit offered.

The College uses Alliant Data System software. The system posts the charges for credit hours when the student enrolls. The FA award is posted no sooner than 10 days prior to the first day of classes. The Pell award is calculated by the software system based on credit hours in which the student had begun attendance. The system generates the refund credit balances no later than the 14th day after the first day of classes.

8. **The degree of the office automation used in the administration of Title IV aid:**

Awards and credit balances are calculated by the computer system based on verified enrolled hours at the census date; R2T4 calculations are done manually online at DOE website by the Business Office.

Suggested information:

- Description of the type of software application used by the financial aid office and business office. Is the system homegrown or an off the shelf product?
 - BSCC uses Alliant Data Systems AS 400 software.
- Process for how ISIR records are received through FAA Access to CPS online and how that data is entered into your own computer system.
 - ISIR information is electronically transferred from the DOE system into the AS400 financial aid module.
- Process for any automatic systems such as packaging, SAP determinations, budget construction, reviewing files, requesting verification documents.
 - These processes are currently being performed manually.
- If financial aid documents are kept in electronic format, explain process.
 - Currently, most documents are retained in hard copy. Electronic scanning of financial aid files is scheduled for the near future.
- Explain how computer systems are backed up.
 - Daily back ups are performed by the Computer Services Department. Back-up tapes are rotated off-site.
- Explain security measures in place to protect private information, e.g., the use of passwords, etc.
 - User IDS are assigned by IT Department as approved by User Department Head. Access is given on a module and program basis.
 - Passwords are required to be changed every 60 days.
 - FERPA warning is displayed on every log-on screen, requiring the user to acknowledge prior to proceeding into the system.
 - BSCC does employ firewall security protection.

Documentation to show clear and separate division of responsibility for the administration of financial aid programs that are divided between the Financial Aid Office and the Fiscal Office.

Complete the information below to indicate individuals who are responsible for the Financial Aid and Fiscal Office as applicable at your institution. You must ensure that there is a separation of function as outlined in [668.16](#):

Financial Aid Office

FAA

Fiscal or Business Office

Dean of Finance

**Good Practices****(Good Practice Suggestion)**

Providing specific detail of your organizational structure assists in an understanding of how your Title IV aid operation is structured.

- Describe the organizational structures of the business office and the financial aid office.
- Include the general office hours for the offices and how appointments are made to assist students.
- Include a flow chart or organizational chart that shows the structure and interfaces of both offices.
- Include copies of Job Descriptions for key positions in both offices.
- Include the structure of other offices that work closely with the Financial Aid Office.

Financial Aid Office:

Counselors/advisors report to FAA; FAA reports to Dean of Students;

The financial aid personnel do not have access to business office functions within the computer system. Inquiry only access is granted on a need-to-know basis.

Fiscal or Business Office:

Accountants and clerks report to Director of Accounting; Director of Accounting reports to Dean of Finance, who

reports to President. The business office personnel do not have access to financial aid functions within the computer system. Inquiry only access is granted on a need-to-know basis.

Identify:

Where fiscal records are maintained: Business Office – hard copy, electronic form

Documentation to show that Satisfactory Academic Progress standards are published and are reasonably applied for measuring whether an otherwise eligible student is making SAP in his/her educational program.

Academic Standards:

SAP Standard for Title IV students:

Minimum Grade Point Average

In order to retain eligibility for federal and state financial aid programs, a student must maintain the following Grade Point Average (GPA) based on the number of scheduled hours. Attempted credit hours include all hours in which a student is enrolled after the drop-add period ends at Bishop State Community College plus any transferred credit hours.

Hours Attempted	Required GPA
12-21	1.50
22-32	1.75
32 or more	2.00

Completion Rate

Each student is required to successfully complete 67% of all credit hours scheduled, which also include transfer hours. Scheduled hours are credit hours that the student is enrolled in after the drop-add period and includes grades of A, B, C, D, F, IP, I and W.

Example: Charles has scheduled 35 credit hours at Bishop State Community College and transferred 20 credits into his program from Grambling State University. To retain his financial aid eligibility, Charles is required to complete 67%, or 36.85, of the total attempted credit hours ($35+20 = 55 \times 67\% = 36.85$).

Are standards for Title IV students the same or stricter than non Title IV students enrolled in the same educational program? Y N

List the:

- Qualitative component for measuring SAP (must consist of grades with standards that meet or exceed the requirements of [668.34](#), work projects completed, or comparable factors that are measurable against a norm):

Graduated GPA requirement based on hours attempted

- Quantitative component (that consists of a maximum timeframe) for which a student must complete his/her educational program:

67% completion rate of attempted hours

- Timeframe for an undergraduate program (not to exceed 150% of the published length):
150%

Identify:

- When the school checks SAP (must not exceed the lesser of one academic year or one-half the published length of the educational program):

SAP Evaluation

SAP for all financial aid recipients will be evaluated at least once in an academic year. According to new federal regulations on SAP, students not meeting the published SAP guidelines will have to appeal the unsatisfactory progress, and if the appeal is approved, the student will be placed on probation for that term. The student will receive financial aid while on financial aid probationary status.

- The process the school uses to ensure consistent application of standards to all students within categories of students (full-time, part-time, undergraduate, and graduate students, and educational programs established by the school):

The same standards are applied to all students.

The school's written policies for the following:

- Incompletes:
- Withdrawals:
- Repeated courses:
- Noncredit remedial courses:
- Transfer credits:

Completion Rate

Each student is required to successfully complete 67% of all credit hours attempted, which also include transfer hours. Attempted hours are credit hours that the student is enrolled in after the drop-add period and includes grades of A, B, C, D, F, IP, I and W.

Change of Major or Program and Transfer Credits

Bishop State Community College students are allowed to change their program of study or major twice and still continue to receive financial aid until their maximum time frame is reached.

Generally, all periods of the student's enrollment count when evaluating SAP, even in periods when the student did not receive financial aid. It is the policy of Bishop State College to allow a financial aid student to change majors no more than two times. Credits attempted and earned under a previous major will not count towards the new major in evaluating Satisfactory Academic Progress (SAP) if those credits do not transfer to the new major. The student's SAP is reset with the change of major. Transfer students credits that apply towards the student's declared major of study will be counted in evaluating SAP. Grades of W's and F's and IP's earned at another college that will not transfer to Bishop State College will not be counted in the SAP evaluation.

Students changing their major or program of study are required to complete and submit to the Registrar's Office a "Change of Major" form. The Registrar's Office will determine how many credit hours from the previous major(s) or program(s) will count toward the new major or program. All attempted and earned credits applicable to the new major or program will be included in the calculation of the maximum time frame.

Example: Latisha changed her program of study from General Education to Nursing. She has scheduled 90 credit hours under General Education. Fifty (50) credit hours from the General Education program will count toward the Nursing degree which requires 72 credit hours to graduate. The maximum time frame for a Nursing degree is 108 credit hours (72x1.5). Latisha may receive financial aid for 58 credit hours (108 credits - 50 credits) before she loses her financial aid eligibility. The Change of Major forms (same form can be used for a change of program) can be obtained from the Registrar's Office.

Repeated Courses

Repeated courses will be counted as attempted hours in calculating the maximum time frame.

When a course is repeated, the last grade awarded (excluding grades of W) replaces the previous grade in the computation of the cumulative grade point average. The grade point average during the term in which the course was first attempted will not be affected. When a course is repeated more than once, all grades for the course – excluding the first grade – will be employed in computation of the cumulative grade point average. The transcript will list each course in which a student has enrolled; however, a course may be counted only once toward fulfillment of credit hours for graduation. A student may request course forgiveness in the Office of Student Services. No veteran or person eligible for veterans' benefits who has satisfactorily completed a course will be allowed to repeat a course for higher or better grade to improve grade point average. Additionally, all grades will be posted on the transcript and computed in the cumulative grade point average for any course repeated.

Developmental Courses

Students who are required to enroll in developmental coursework may attempt up to 30 credit hours in developmental courses (per federal guidelines). The 30 credit hours in developmental courses will not be counted in the maximum time frame for the students' program of study.

Example: Jim has attempted 90 credits (maximum time frame for GNE A.S.). However, 20 of the credit hours that he has attempted are developmental courses. Jim can be paid an additional 20 credit hours before he loses his financial aid eligibility (90-20 developmental course credits).

Provide:

- The schedule established by the school that designates the minimum percentage or amount of work that a student must successfully complete at the end of each increment to complete his/her educational program within the maximum timeframes:

See SAP policy
- Appeal procedure for those students not making SAP: See below.
- Procedures for a student to re-establish and document that the student has made SAP: See below.

Financial Aid Probation

A student whose financial aid appeal has been approved will be placed on Financial Aid Probation for the term the student has appealed to receive financial aid. The student must meet the conditions of the approved appeal to continue receiving financial aid beyond the financial aid probationary period.

Financial Aid Suspension

If, at the end of the probationary semester, the student is still not meeting one or more of the minimum SAP requirements, the student will be placed on Financial Aid Suspension and will become ineligible for federal and state financial aid until SAP is met at the student's own expense.

Financial Aid Appeal Process

Students who have had financial aid canceled for any reason may appeal to have their aid reinstated or the maximum time period extended. The student must complete the Financial Aid Appeal Form, and submit adequate documentation to support their mitigating circumstances to the Financial Aid Office. The financial aid appeal form can be obtained from the Financial Aid Office or downloaded from the financial aid webpage. Appeals submitted without documentation will be automatically denied.

The student who fails to demonstrate that there were mitigating circumstances that prevented them from complying with the SAP requirements will not be approved for reinstatement of financial aid. To regain financial aid eligibility, a student must meet minimum quantitative and qualitative SAP requirements at their own expense.

A financial aid appeals committee charged with reviewing the appeals may waive the SAP requirement due to injury to students, illness of students, or the death of relatives, or other reasons judged to be a reasonable reason. The committee may also waive the SAP requirement in cases where a student may have experienced undue hardships as a result of special circumstances. An example of special circumstance will be a serious personal injury or life altering event. This must be documented. The student will be required to explain why SAP policy was not met and what has changed that will enable the student to meet the published SAP requirement. A student whose appeal is denied has the right to appeal the denial in writing to the Manager of Financial Aid whose decision is final.

Reinstatement of Financial Aid

Students who successfully appeal their financial aid suspension will have their financial aid eligibility reinstated on probation for one semester. The student will be informed of the outcome of the appeal via letter/e-mail. To continue receiving financial aid, the student must meet all SAP requirements and any special requirements listed in the approved financial aid appeal form at the end of the semester.



Important A critical piece of information that, if overlooked, could result in an error

Academic Year Definition (668.3):

Schools are required to define their academic year. It is essential to include the definition in this section in order to understand your SAP standards.

1. Include whether the school offers programs in credit hours with terms, clock hours, or credit hours without terms.
2. Include the minimum academic year definition for all programs.
3. Include whether your school's academic year is more than the minimum requirement.
4. Include whether the school has one definition for all programs. If not, include an explanation of those programs that need a different definition.
5. Include whether the payment periods are determined by terms or by hours and weeks.

Academic Year

For purposes of student financial aid programs, our academic year is defined as 30 weeks of instructional time (two 15 week semesters) and at least 24 credit hours.

Schools must have an adequate system to identify and resolve discrepancies in the information that the school receives from different sources with respect to a student's application for financial aid under the Title IV, HEA programs. Use the information in this section to help you develop your procedures for resolving conflicting data.

Resolving Conflicting Data:

Our procedures ensure that we resolve conflicting data for our applicants as follows:

- **Applicants selected for verification** – If the school has reason to believe that any information on the application used to calculate the EFC is discrepant or inaccurate (or if any supporting documentation is discrepant or inaccurate), we must require the applicant to provide adequate documentation to resolve the conflict.
- **Applicants not selected for verification** – the school must resolve conflicting information regardless of whether or not the applicant was selected for verification. The financial aid office must review all tax returns provided to the school even if they were not requested. All C Codes on the ISIR must be reviewed and resolved by the financial aid office.
- **Other applicant information received by the school** – The school has an adequate internal system to identify conflicting information that it may have regardless of the source. The office lead for each office are required to provide information that could impact the financial aid status of each student applicant e.g. **Admissions Office**: High School Diploma, **Fiscal Office**: Report outside awards, report FWS earning in a calendar year **Registrar**: Report changes in enrollment, **NSLDS**: Review financial aid history, (e.g. review aid received from prior colleges attended).

Resolving Conflicting Information

Before an award can be made to a student, conflicting information will be resolved.

For example: In checking the NSLDS database the Financial Aid Office discovers that the student has attended another college but failed to inform the Admissions Office. The Financial Aid Office will notify the Admissions Office of the conflict and place a processing hold on the student's record. The student will be informed that in order to be awarded financial aid, the academic transcript from the other college must be received by the Admissions Office.

As conflicts arise they will be addressed and any other offices involved will be notified.

The charts below are available by selecting the link: <http://ifap.ed.gov/gadocs/FSAVeriModule/activity4verif.doc>

Good practices vs. what is required



Chart A provides examples of issues that are considered **Conflicting Data**. Although the chart is designed to be extensive, it is not to be construed as an all-inclusive list. The chart is provided for information only and has been developed to help you review your policies and procedures.

(Important) A critical piece of information that, if overlooked, could result in an error.

Chart A: Examples of issues considered Conflicting Data

- A student not selected for verification, the tax return is on file and information conflicts with items on the FAFSA.
- 1040 shows parent single head of household and the FAFSA/ISIR shows the same person as married.
- Parent or student report on their FAFSA and signed a verification worksheet that they will not file an IRS 1040. You have reason to believe that they would have been required to file a U.S. Income Tax Return, as the amount of reported income is greater than or equal to the minimum amount required to file as indicated in the instructions provided on the 1040.
- Statements or information that suggests that the copy of the Income Tax Return you received is not the return actually filed with the IRS.
- School receives Profile from CSS. Student reports a specific amount in untaxed income; FAFSA reports a different amount (If the school receives the CSS Profile, it must ensure that information contained there does not conflict with other documents received by the school).
- Veterans Affairs (VA) benefits verified by the certifying official in the Registrar's Office don't match the FAFSA. (To resolve conflict, can rely on certifying official).
- Admissions information received impacts student eligibility (i.e., student accepted into a non degree program, student received scholarship from high school, etc.)
- The Student Academic Progress or Enrollment Status on file in the Financial Aid Office doesn't agree with the information from the Registrar's Office.

Identify person(s) responsible for coordinating both Federal and non-federal aid at your institution.

- Provide procedure as to how Federal and non-Federal aid is identified and processed through the financial aid office.

The Financial Aid Office is responsible for entering all financial aid codes into the computer system. No aid can be awarded without a FA code. The Scholarship Committee is responsible for awarding non-Title IV aid and communicating those awards to the FA Office.

Provide procedures to identify and resolve discrepancies in the information that the institution receives from different sources with respect to a student's application for Title IV aid.

- Identify all student aid applications, need analysis documents, Statements of Registration Status, and eligibility notification documents presented by or on behalf of each aid applicant. Provide a description of all documents, including any copies of State and Federal income tax returns that are normally collected.
- Include a description of how the institution verifies information received from the student or other sources.
- Include procedures concerning the coordination of any other information normally available to the institution regarding a student's citizenship, previous educational experience (NSLDS), documentation of the student's social security number, or other factors relating to the student's eligibility for Title IV Aid (e.g. coordinating outside aid received by various offices on campus).
- Include procedures to refer to the Office of the Inspector General of the Department of Education for investigation any credible information indicating that an applicant for Title IV may have engaged in fraud or other criminal conduct.
- Include any credible information indicating that any employee, third-party servicer, or other agent of the school, who acts in a capacity involving the administration of Title IV, HEA programs, or the receipt of funds under those programs may have engaged in fraud, misrepresentation, conversion or breach of fiduciary responsibility or other illegal conduct involving the Title IV, HEA programs.

Financial Aid personnel have inquiry-only access to Admissions information. Financial aid personnel review Admissions information, NSLDS, and other documents as requested from the student for verification or conflicting information resolution. The College reserves the right to require other supporting documentation in the verification or conflicting information resolution process.

Fraud and Abuse

The College has an obligation to refer to the Office of the Inspector General of the Department of Education for investigation any credible information indicating that an applicant for Title IV may have engaged in fraud or other criminal conduct.

Should fraud or abuse be detected or suspected, report it to the Financial Aid Office. The Manager will consult with the school's legal counsel prior to referring it for investigation to the Office of the Inspector General of the Department of Education or any agency outside the school.

All credible information indicating that an applicant for Title IV may have engaged in fraud or other criminal conduct will be provided. Fraud is intent to deceive as opposed to a mistake.

OIG Address and Phone Numbers

Office of Inspector General
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-1510
1-800-MIS-USED

Email: oig.hotline@ed.gov

Web: <http://www.ed.gov/about/offices/list/oig/hotline.html>

Regional Offices Telephone No. National Hotline

Boston, MA (617) 289-0174
Inspector General's Hotline

New York, NY (646) 428-3861
Philadelphia, PA (215) 656-6900
Atlanta, GA (404) 562-6460
Chicago, IL (312) 730-1620
Dallas, TX (214) 661-9530
Denver, CO (303) 844-0058
Kansas City, MO (816) 268-0530
Long Beach, CA (562) 980-4141
San Juan, PR (787) 766-6278
Washington, DC (202) 245-6911

OIG referrals

34 CFR 668.16(g)

IRS Publication 17

Additional fiscal requirements are found throughout most sections of this manual. The fiscal requirements here are also be *part* of the fiscal requirements in Sections 4-11 of this manual. You may choose to repeat the information contained in this section (in sections 4-11) or you can refer to this section as appropriate. However, you must still include the specific information required in addition to this general fiscal information as applicable in each section.

Maintaining records required under the individual Title IV HEA program regulations. Specifically,

Fiscal reports and financial statements

- Identify systems that will provide all program financial statements required for compliance. Include bank account and internal ledger reconciliation procedures.

The Business Office is responsible for compiling required financial statements by October 31 of each year. Budget and expenditure information is available on-line to each budget center manager. The bank accounts are reconciled each month during the Monthly Closing process. It is documented on the Monthly Closing Checklist, which is approved by both the Director of Accounting and the Dean of Finance.

The Director of Accounting is responsible for reconciling Title IV funds applied and disbursed to students to the G5 and general ledger on a monthly basis. The reconciliation is sent to the FA office for any award corrections needed.

Develop and follow procedures for maintaining general fiscal records for Title IV programs as outlined in [34 CFR 668.24 \(b\)](#).

Title IV program Fiscal records

An institution shall account for the receipt and expenditure of Title IV, HEA program funds in accordance with generally accepted accounting principles.

Your institution's procedures must show how the school establishes and maintains on a current basis:

Financial records that reflect each HEA, Title IV program transaction; and General ledger control accounts and related subsidiary accounts that identify each Title IV, HEA program transaction and separate those transactions from all other institutional financial activity.

Include procedures to show how your school maintains Title IV funds received in accordance with the disbursement requirements outlined in [34 CFR 668.164](#). The following areas are outlined in [668.164](#) and can be used as a guide when developing your procedures.

Disbursing Title IV Funds [34 CFR 668.164](#):

Procedures must address the following provisions for disbursement of Title IV funds:

- How Title IV Funds are disbursed
 - Procedures to ensure disbursement of Title IV funds by payment period
 - Method used for payment to a student's account
 - Procedures for disbursing credit balances

- **Procedures for early and late disbursements**

Separate accounting funds are used for each Title IV program for each year. These accounts are reconciled with student detail accounts on a monthly basis.

Title IV funds are issued each payment period and those payment periods are captured and identified within the FA system, in detail, by student. Work-study funds are disbursed on the 10th of each month.

Paper checks are currently mailed to the students for credit balances. Direct deposit will be offered in the future.

Credit balances are disbursed no later than the 14th day after the first day of classes each semester. Changes to students' accounts are reviewed weekly for any additional credit balance disbursements due.

Approved financial aid awards are posted to the student's account no earlier than the 10th day before classes begin. However, credit balances are disbursed to the students no later than the 14th day after classes begin to allow for schedule changes during the drop add period. The 14th day time frame for disbursing credit balances complies with regulatory requirements cited in 34 CFR 668.164.

CREDIT BALANCE POLICY

All forms of financial aid, including institutional grants and scholarships, will be credited to a student's account at the beginning of the semester or when the student becomes eligible. After allowable charges have been paid, any remaining credit balance on the student's account will be issued by check within 14 days of when the credit balance occurred. **Credit balance checks are issued by the Business Office.**



Help

The Fiscal Year-End reconciliation worksheet is designed as a comprehensive exercise for all programs for year-end reconciliation. It is also important for schools to ensure that they reconcile all accounts on a monthly basis. Monthly reconciliation also makes year-end reconciliation an easier process. There are separate worksheets for each program. Instructions are included with each worksheet.

These forms can be accessed from the Fiscal Management Assessment <http://ifap.ed.gov/qahome/qaassessments/fiscalmanagement.html>

Or, select any specific worksheet listed below:

Fiscal Year-End Reconciliation Worksheet

Federal Pell Grant Monthly Reconciliation

ACG/National SMART Monthly Reconciliation

TEACH Grant Monthly Reconciliation

FWS Monthly Reconciliation

Federal Perkins Monthly Reconciliation

FSEOG Monthly Reconciliation

Direct Loan Monthly Reconciliation

FFEL Monthly Reconciliation (For schools receiving funds via EFT and Master Check)

FFEL Monthly Reconciliation (For schools receiving funds via individual checks for each borrower)

The following topics need to be addressed for Financial Aid counseling of students:

- Identify the sources and the amount of each type of aid awarded.
- Provide a method by which aid is determined and disbursed, delivered or applied to a student's account.
- Make available the rights and responsibilities of the student with the respect to enrollment at the institution and receipt of financial aid.
- Provide information regarding the institution's refund policy, the requirements for the treatment of Title IV funds when a student withdraws under [668.22](#), its standards of SAP and other conditions that may alter the student's aid package.

FEDERALLY FUNDED FINANCIAL AID PROGRAMS

College Work-Study (FWS) - This program was authorized by the Economic Opportunity Act of 1964. Public Law 88-452. It is designed to assist those students who demonstrate financial need in order to pursue a college education. Participants in the program are given job assignments in various departments on campus. Preference is given to students with the greatest financial need on a first come .first-serve basis as long as funds are available. At Bishop State Community College, the following eligibility criteria are required for participating in the College Work-Study Program:

1. Student Eligibility

- a. The student must be enrolled on at least a half-time basis.
- b. The student must be a citizen or permanent resident of the United States.
- c. The student must demonstrate financial need through the normal application process.
- d. The student must apply for the Federal Pell Grant program.

2. Application Materials and Procedures

Students may apply for financial aid on the web-www.fafsa.ed.gov

3. Award Procedures - After students have demonstrated financial need, the following criteria is used in making awards:

- a. The availability of College Work-Study funds
- b. First consideration for returning FWS students
- c. Preference is given to students with the greatest 'financial need'.

4. Notification of Award - Notices of College Work-Study awards will be conveyed through the official award letter and the BSCC website (BORIS)--[www. Bishop.edu](http://www.Bishop.edu).

5. Job Placement

- a. All work assignments will be coordinated through the Financial Aid Office in writing with each supervisor, student and the Financial Aid Coordinator.
- b. Supervisors shall not accept students for work without official assignment from the Financial Aid Office.
- c. Every effort will be made to assign students to positions that relate to their major area.

6. Disbursement Procedures

- a. The payroll period for College Work-Study students will be processed on the 10th day of the month. The pay period begins the first day and end the last day of the month.
- b. College Work-Study supervisors are responsible for maintaining accurate records by recording dates and hours worked by students on a daily basis.
- c. The Financial Aid Office will supply all supervisors with official time sheets for monthly reporting.
- d. Supervisors are required to complete the daily and weekly time sections of the time sheet.
- e. Time sheets must be signed and dated by supervisors and college work-study student.
- f. Time sheets must be submitted to the Business Office by the supervisor or other staff personnel no later than the first working day of each month. Late time sheets will be processed the following pay period.
- g. The Business Office will verify and compute the earnings of students as reported on time sheets.
- h. Earnings are posted to students' cumulative earnings records.
- i. Students should report to the Business Office for check disbursement.
- j. Deductions will be made as needed on outstanding account balances, if applicable.

Supplemental Educational Opportunity Grant (FSEOG) Program - This program was authorized by the Higher Education Act of 1965. It is designed for students with exceptional financial need who, without the grant would be unable to attend college. The program is governed by federal regulations as outlined in the Federal Student Financial Aid Handbook. At Bishop State Community College the following criteria is required for participating in the SEOG Program.

1. Student Eligibility

- a. The student must be enrolled on at least a half-time basis.
- b. Full-time students with zero expected family contribution get first preference.
- c. The student must be a citizen or permanent resident of the United States.
- d. The student must demonstrate exceptional financial need through the required application process.

2. Award Procedures - After students have demonstrated financial need, the following criteria is used in making awards:

- a. The availability of FSEOG Funds
- b. First consideration for students with zero expected family contribution.
- c. Preference is given to students with the greatest financial need.

3. Notification of Awards

- a. Notices of FSEOG Awards will be conveyed through the official award letter and the BSCC website (BORIS)--[www. Bishop.edu](http://www.Bishop.edu).

4. Disbursement Procedures

- a. FSEOG awards are payable during each semester.
- b. The Financial Aid Office will prepare a list to be submitted to the Business Office for disbursement.
- c. Deductions will be made as needed for outstanding account balances, if applicable.

Pell Grant Program - The Pell Grant Program was authorized by the Higher Education Act of 1965, as amended by the Education Amendments of 1972. It is the intent of the program to provide eligible students with a "Floor" of financial aid to help defray the cost of postsecondary education. Student eligibility is based primarily financial need, determined on the basis of a formula developed by the U.S. Department of Education. The formula is applied uniformly to all applicants. The FAA has the responsibility of administering the regulations and guidelines of the as stipulated in the Federal Student Handbook.

1. **Student Eligibility**

- a. Must not have received a bachelor's degree from any Institution.
- b. Must be enrolled on at least a part-time basis in an eligible program of study offered by the college.
- c. Must be a citizen or eligible non-citizen of the United States.
- d. Must have financial need and is working toward a degree or certificate.
- e. Must be making satisfactory academic progress, Quantitatively & Qualitatively.
- f. Must be registered with the Selective Service (if required).
- g. Conviction of drug, distribution or possession may make a student ineligible for Pell Grant.

2. **Application Materials and Procedures**

- a. Each student must submit an application of Federal Student Aid (FAFSA) Free Application for Federal Student Aid.
- b. Each student must receive from the Pell Grant Processing Center a "Student Aid Report (SAR) indicating eligibility.

3. **Award Procedures**

- a. The College downloads the student's ISIR from COD into the College's financial aid system.
- b. Using the Pell Grant payment schedule, the Financial Aid Office personnel assigns the amount of each Pell award based on the student's expected family contribution.
- c. An award letter is generated and mailed to the student.

4. **Disbursement Procedures**

Title IV financial aid checks are payable to students after attendance verification has been completed to satisfy the requirement that the student begin attendance in all registered classes.

STUDENT RIGHTS

Students have the right to obtain the following information from the College. This information can be found on the College's website and catalog.

- Names of its accrediting or licensing organizations
- Information about its programs, its instructional, laboratory and other physical facilities, its faculty and the cost of attendance
- College's policy and the Financial Aid/VA Office's policy on refunds to students who drop out
- Types of financial assistance available, including information on all federal, state, local, private and institutional financial aid programs
- Procedures and deadlines for submitting applications for each available financial aid program
- Criteria used to select financial aid recipients
- Process used to determine student financial need. This process includes how costs for tuition and fees, room and board, travel, books and supplies and personal and miscellaneous expenses are considered in the cost of education. It also includes how resources (such as parental contribution, other financial aid, assets, etc.) are considered in calculating student need and amount of student financial need, as determined by the institution, that has been met
- Procedure for paying students
- Type and amount of assistance in a student financial aid package and an explanation of each award
- How much of the financial aid award is grant aid
- Kind of job and the hours to be worked, the duties, the rate of pay and the payment schedule and procedure - if students are offered a Federal College work-study job

- Reconsideration of an aid package, if they believe that a mistake has been made or if enrollment or financial circumstances have changed
- Process and policy used by the College to determine whether students are making satisfactory progress and what happens if students are not
- Special facilities and services available to persons with disabilities.

STUDENT RESPONSIBILITIES

It is the responsibility of students to do the following:

- Review and consider all information about a college's program before enrolling
- Pay special attention to the application for student financial aid, complete it accurately and submit it on time to the right place. Errors can delay or prevent students from receiving aid
- Meet all deadlines for applying or reapplying for aid
- Provide all additional documentation, verification, corrections and new information requested by the Financial Aid/VA Office
- Read, understand and keep copies of all forms which they are asked to sign
- Comply with the provisions of agreements that they must sign
- Notify the school of any change in name, address or attendance status (half time, three-quarter time or full time)
- Satisfactorily perform the work agreed upon in a College work-study job
- Understand the College's refund policy and the Financial Aid Return to Title IV Refund policy
- Complete a new financial aid application each year.