# BETHEL

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**Review:** Annually

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# **Section 1: Introduction**

The Use and Scope of This Manual

# **1.1 Introduction**

Bethel University must comply with all federal and state regulations when awarding and disbursing aid from those entities. This manual represents Bethel University's current practices whenever state and federal regulations determine that policy decision-making is the responsibility of the University.

**Bethel University has Three Financial Aid Office Locations** 

 Traditional Programs Financial Aid Office
 325 Cherry Avenue – Vera Low Building McKenzie, TN 38201
 Phone: 731-352-4226
 Fax: 731-352-3407
 Email: <u>finaid@bethelu.edu</u>
 Website: <u>www.bethelu.edu</u>
 Hours of Operation: 8:00 am to 4:30 pm, Monday through Friday

2. Modular Programs Financial Aid Office
16035 Highland Ave.
McKenzie, TN 38201
Phone: 844-415-2151 Fax: 731-393-0392
Email: <u>studentsupport@bethelu.edu</u>
Website: <u>www.bethelu.edu</u>
Hours of Operation: 8:00 am to 4:30 pm, Monday through Friday

3. University Financial Aid Funding 325 Cherry Avenue – Campbell Hall McKenzie, TN 38201 Phone: 731-352-4253 Fax: 731-352-3407 Email: <u>bufunding@bethelu.edu</u> Website: <u>www.bethelu.edu</u> Hours of Operation: 8:00 am to 4:30 pm, Monday through Friday

# **1.2 Purpose and Philosophy of the Financial Aid Office**

# **Bethel University's Mission Statement**

Bethel University's mission is to create opportunities for members of the learning community to develop to their highest potential as whole persons-intellectually, spiritually, socially, and physically, in a Christian environment.

# **Bethel University's Financial Aid Office Mission Statement**

The main objective for all of Bethel University's Financial Aid Offices is to serve the student. To do this, we strive to remove financial barriers, to make available access to higher education, and provide students and their families with courteous and efficient financial services while complying with all federal, state and University policies.

# **1.3 Policies and Procedures Development Responsibilities**

The policies and procedures of Bethel University's Financial Aid Offices develop in collaboration with the University Financial Aid Compliance Team. These policies are set forth to follow the legal requirements set forth by the Federal and State agencies that provide funding for our students. We use the Department of Education Federal Regulation Codes, the Federal Student Aid Handbook, and Dear College Letters to assist us in correctly administering all Federal Student Aid. The Tennessee Student Assistance Corporation (TSAC) provides our offices with regulations, guidelines; in addition, interpretations of state mandated laws for the disbursement of all state provide grants and scholarships. When the Federal and State regulations allow the policy decision-making to be determined by the University we strive to enact fair and equal policy and procedures that support both the University's and Financial Office's mission statements.

# **1.3.1 Responsible Personnel**

It is the responsibility of the University Financial Aid Compliance Team to notify all Financial Aid staff and the Director of Finance of any changes to the Financial Aid Policies and Procedures. These policies will be reviewed each year or when Federal or State regulations are enacted that require changes be made. The Directors for each program are responsible to notify their staff, students, and key University personnel of any new changes and updates that may affect them.

## **Bethel University Financial Aid Compliance Team:**

Dr. David Huss VP of Finance, CFO, Director of Financial Aid (731) 352-4001 <mark>hussd@bethelu.edu</mark>

Lisa Stafford Director of University Financial Aid Funding SACSCOC Finance Coordinator (731) 352-4299 staffordl@bethelu.edu

Brandi Lee Director of Modular Billing and Financial Aid (731) 352-8423 <u>leeb@bethelu.edu</u>

Crystal Legens Associate Director of Modular Financial Aid (731) 352-8416 <u>legensc@bethelu.edu</u>

Brenda Bradshaw Director of Traditional Financial Aid (731) 352 -4233 <u>bradshawb@bethelu.edu</u>

Regina Simpson Director of Traditional Billing and office Manager (731) 352-6346 <u>simpsonr@bethelu.edu</u> Janie Burns Institutional Reporting and Accreditation Analyst (731) 352-4253 <mark>burnsj@bethelu.edu</mark>

Dr. Phyllis Campbell Chief Academic and Compliance Officer (731) 352-4046 <u>campbellp@bethelu.edu</u>

Lisa Vaughn Executive Director of College of Professional Studies (731) 352-7627 <u>vaughnl@bethelu.edu</u>

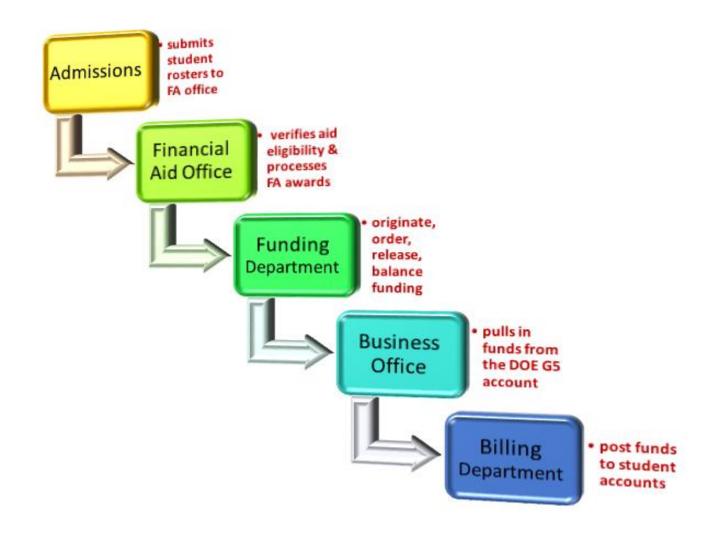
#### **1.3.2 Documents and Methods**

The University Financial Aid Compliance Team all have access to the Department of Education (ED) Information for Financial Aid Professionals (IFAP) website and NASFAA's *Today's News* that is emailed daily announcing changes to the statute, regulations, and ED guidance as they occur. These staff members are also members of the Tennessee Association of Student Financial Aid Administrators (TASFAA) who emails breaking Financial Aid updates as they occur.

#### **SECTION 2: ADMINISTRATIVE ORGANIZATION & OFFICE MANAGEMENT**

#### **2.1 Institutional & Divisional Structure**

It is the responsibility of the *Admissions Office* to notify the Financial Aid Office that the student's admission file is complete on all new students. The *Financial Aid Office* determines what type and amount of aid the student is eligible to receive based on the eligibility requirements set forth by the Federal and State agencies. The Financial Aid Department staff follows the federal regulation guidelines to determine the scheduled dates for disbursements based on the dates of enrollment. Two week prior to the scheduled disbursement dates for Ioans and Federal Pell, the Funding staff originates from the Federal agencies. The funding department staff orders 3 weeks prior for TSAC and Lottery from State agencies by designated University Financial Aid Funding staff in charge of those state or federal programs. Any other state funds that a student requested and is eligible to receive processes when applicable. The funding department staff processes student scholarships weekly according to dates scheduled by the financial aid staff. The Financial Aid drops staff submits a return of title IV memo to the funding department staff who processes those returns weekly. It is the responsibility of the Financial Aid Office to notify the Business Office weekly of the total funds that have released. The Business office staff pulls the funds in from the Department of Education's G5 account and post to the University banking accounts. The billing department is responsible for pulling up the billing batch transfers and posting the funds to the student's account. The billing office staff determines when and how much of a credit balance students are issued by reviewing the receipt of Federal funds and must disburse these credit balances to the students within the guidelines set by the Department of Education, which is 14 days from the date the credit balance occurs.



2.2 Financial Aid Office Structure & Position Responsibilities The staff has opportunities to attend state workshops and the Financial Aid Directors of each department is responsible for hold training workshops throughout the year. The Financial Aid Staff may attend webinars hosted by agencies throughout the year as ordered by the department Director. The Americans with Disabilities Act set all requirements forth for employees as followed; these requirements are located in the University's Human Resource Office.

# **2.2.1 Personnel Policies**

The policies including but not limited to governing conditions for hiring, evaluating, promoting, conduct, benefits, taking disciplinary action, and terminating an employee is located in the employee handbook provided by the Human Resource Office. The compliance with applicable anti-discrimination, civil rights statutes and regulations and drug-free workplace requirements is also located in the employee handbook provided by the Human Resource Office.

# **Financial Aid Code of Conduct**

The Financial Aid Office at Bethel University is a member of the National Association of Student Financial Aid Administrators (NASFAA). We adhere to the following professional standards:

"An institutional financial aid professional is expected to always maintain exemplary standards of professional conduct in all aspects of carrying out his or her responsibilities, specifically including all dealings with any entities involved in any manner in student financial aid, regardless of whether such entities are involved in a government sponsored, subsidized, or regulated activity. In doing so, a financial aid professional should:

Refrain from taking any action for his or her personal benefit.
Refrain from taking any action he or she believes is contrary to law, regulation, or the best interest of the students and parents he or she serves.
Ensure that the information he or she provides is accurate, unbiased, and does not reflect any preference arising from actual or potential personal gain.
Be objective in making decisions and advising his or her institution regarding relationships with any entity involved in any aspect of student financial aid.
Refrain from soliciting or accepting anything of other than nominal value from any entity (other than an institution of higher education or a governmental entity such as the U.S. Department of Education) involved in the making, holding, consolidating or processing of any student loans, including anything of value (including reimbursement of expenses) for serving on an advisory body or as part of a training activity of or sponsored by any such entity.
Disclosure to his or her institution, in such manner as his or her institution

may prescribe any involvement with or interest in any entity involved in any aspect of student financial aid."

# **2.3 Frequent Contact Information**

Financial Aid Director for their program or a University Financial Aid Compliance Team member should answer and assist all questions regarding the administration of Title IV aid programs by the Financial Aid staff. All Financial Aid Directors that have questions regarding the administration of Title IV aid programs should contact and communicate with the University of Financial Aid Compliance Team for assistance.

# 2.3.1 Third-Party Servicers

# **Policies**

Only the VP of Finance/CFO has the authority to authorize the use of third- party servicers.

## Procedures

A third-party servicer is an individual, or a state, or a private, profit or non-profit organization that enters into a contract with an eligible institution to administer, through manual or automated processing, any aspect of the institution's participation in any Title IV, HEA program.

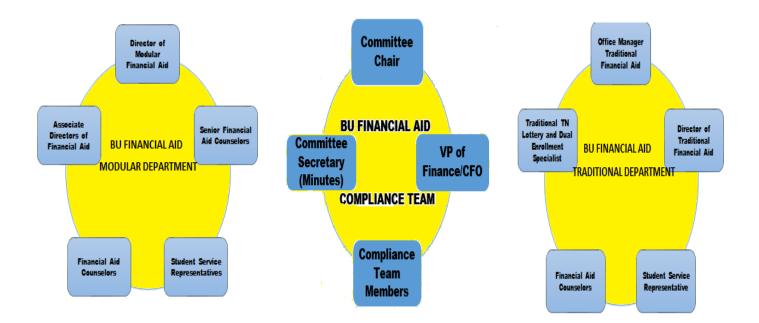
- Heartland ECSI administers the Perkins Loan Program and the person designated by the Business Office are responsible for monitoring the work performed by this entity and is responsible for addressing any problems with the work performed.
- EdFinancial Services performs the Verification Process on the Free Application for Federal Student Aid (FAFSA) when the Department of Education or the school chooses the file.

The University Financial Aid Compliance Team is responsible for monitoring the work performed by this entity and is responsible for addressing any problems with the work performed.

# 2.4 General Financial Aid Office Administration

The general office hours for each college is located under section 1.1 of this manual. Our mission is to serve our students, should a student need special accommodations outside of the normal work hours the Financial Aid Staff will assist the student after hours.

It is highly recommended that the Financial Aid Directors of each program meet with their staff regularly to ensure all financial aid staff stays updated on any regulatory issues and address any issues. The University Financial Aid Compliance Team will also meet when needed to discuss regulatory issues and address any issues as needed.



# 2.4.1 Accommodations for Disabilities

# **Policies and Procedures**

Policies and procedures concerning accommodations for disabilities are located in the specific school catalog for that college and/or in the Student Log.

# 2.4.2 Appointments with Staff

# **Policies**

Should a student desire to speak with a Financial Aid staff member in person they may come by the office during working hours for assistance. Should they need to meet with a specific staff member and that person is not available, an appointment will be set up to accommodate the student.

# Procedures

Should a student request an appointment with a specific person in the Financial Aid office the staff member who assists them will take the student's name and contact information and will responsible for notifying both the parties to set up an appointment.

# 2.4.3 Treatment of Correspondence/Forms

# Policies

All Bethel University students communicate via email for their Financial Aid needs through their student Bethel email address.

# Procedures

This notice is given to a student in various forms of communication both verbally and written through different outlets based on the particular college's orientation procedures. Written notification can be found in the specific school catalog for that college and/or in the Student Log or other printed material. If they chose not to use this electronic form of communication, they could contact the Financial Aid office, and an alternative method will be arranged. Students may not choose a different email account to be used as the Financial Aid office cannot ensure that the personal email meets the requirements of the Department of Education concerning safeguards against fraud or abuse (FSA 12-13, p2-134). Bethel University's email security is designed to meet all of these requirements. A student may also obtain access their personal information through the electronic log in system. These also meet the requirements stated above. Each college has a Financial Aid email set up to respond to routine correspondence by students, and a designated staff member is assigned to monitor and respond to these emails daily. Any forms that are required by the Financial Aid office are set up in by a link through Dynamic Forms, can be emailed to the student directly, picked up at the office during business hours, or are made available on the website.

# 2.4.4 Telephone

# Policies

Each Financial Aid office has a specific phone number set up for students to use. These numbers are listed on all written communication and on the website for that college.

# Procedures

Each Financial Aid office has a designated Student Services person(s) to answer phone calls and ensure that the student receives the information they need. If the Student Services person who is answering the call does not know the answer, they will contact the staff member who can assist them to find out the answer. The Student Services will then contact the student with the correct information. If that staff member is unavailable, the person taking the call will obtain contact information from the student, and that student will be contacted by the Student Support staff by the end of the business day even if they do not have an answer to let the student know they are working on assisting them. The phones should be covered at all times, and staff members should rotate lunch times to ensure that the phones are covered at all times. All telephones calls should be handled in a calm and courteous manner. The Student Service person should never use an angry or condescending tone with a student. Should a student become angry, they will do their best to defuse the problem. If they are unable to defuse the situation, the Student Services person will ask for assistance from the Director of their program. If the Director is unable to resolve the issue, the problem will be discussed with the University Financial Aid Compliance Team to find a resolution.

# 2.4.5 Confidentiality of Student Records

# Policies

All Bethel University's Financial Aid staff are informed of the Family Educational Rights and Privacy Act (FERPA) policies as they relate to routine financial aid office operations. These policies can be found in the University's catalog. The Gramm-Leach-Bliley (GLB) Act also known as the Financial Services Modernization Act is the responsibility of Bethel University's Information Technology Department.

# Procedures

All Financial Aid staff is provided information concerning the FERPA regulations, and all staff must sign a form acknowledging that they have been apprised of this information. Financial Aid student workers are also required to read and complete this form. See FERPA forms in the appendix. Every effort should be made to ensure that a student is identified before providing any information. An FERPA information release form must be on file before a staff member can release specific student information to anyone other than the student. This form can be found on the Bethel University main website, <u>www.bethelu.edu</u>, under registrar's forms.

# 2.5 Records Management & Retention

# Policies

All student Financial Aid paper records should be kept in a secure area with the ability to prevent access to unauthorized personnel. All electronic student records are protected by a secure login through the schools electronic system

set-up and maintained by the Information Technology Office. All files should be readily accessible to the University Financial Aid Director and to any other entity, which is required access for inspection by auditors or reviewers.

**2.5.1** Financial Aid Office Records Management and Retention *Procedures* 

The Financial Aid Office began the process of electronic filing for the 2013-14 year. Some Financial Aid offices are maintaining a hybrid of both electronic and paper records. Records prior to 2013-14 are in paper or hybrid format. Inactive records are maintained in the closed file system for both paper and electronic files for five years before they are either shredded or permanently purged from the electronic storage system. As of the 2016-2017 Financial Aid year, all Financial Aid Departments operate electronic. The Information Technology Department is responsible for maintaining a backup system for all electronic records.

2.5.2 Perkins Records Management and Retention

# Procedures

The Business Office is responsible for maintaining all records concerning Perkins Loans

# 2.5.3 Federal Work-Study Records Management and Retention

# Procedures

The Business Office and the Human Resource office is responsible for maintaining all records concerning Work- Study files.

2.6 Information Sharing & the Family Educational Rights and Privacy Act *Policies and Procedures* 

The Financial Aid office follows all FERPA regulations concerning the access of educational records. See section 2.4.5 2.6.1 Internal Disclosure

# **Policies**

The University Financial Aid Director may authorize the access of Financial Aid files both paper and electronic. Only those personnel that are required access this information to perform their job duties should have access to this information. *Procedures* 

The Information Technology office notifies the University Financial Aid Director of anyone who has requested access to any electronic system that maintains Financial Aid records. Approval in writing in the form of an email provides authorization approval or denial. Third party entities with access to Financial Aid student information must follow all FERPA regulations. All release of information to outside entities such a must have a release form on file signed by the student before information may be released.

2.6.2 External Disclosure

# **Policies**

All release of information to outside entities are required to provide a release form to the Financial Aid office signed by the student before information may be released.

# Procedures

The Financial Aid office should ensure that the signature on the form reasonably matches the information on record. Should the Financial Aid staff have any doubt as to the authenticity of the signature or the request the student should be contacted and written authorization should be provided by the student to the Financial Aid office in the form of the FERPA release form listing the outside entity. This authorization to release form and an additional documentation should be maintained in the student's Financial Aid records. All efforts to release information to the outside entity will be processed in a timely manner.

# 2.6.3 Authorization Consent Form

See 2.6.2

# 2.6.4 Information Release via Telephone

# Policies

Information concerning the student Financial Aid records may be released to the student via telephone provided the Financial Aid staff makes every effort to ensure that they are speaking to the student.

#### Procedures

Information to identify the student via telephone can be any or all of the following: Bethel University student ID number, Social Security number, and date of birth, the program of study, cohort group number, or any other information necessary to ensure that the person on the phone is identified as the student.

# 2.6.5 FERPA Related Recordkeeping Requirements

See sections 2.6.2 and 2.5

# SECTION 3: FINANCIAL AID PROGRAMS

# 3.1 Institutional Eligibility Requirements

Bethel University meets the requirement of institutional eligibility by being an "Institution of Higher Education." The school has authorization through a current Program Participation Agreement with the Department of Education and by accrediting agencies. The University Financial Aid Director, VP of Finance, and CFO maintain the documents containing this authorization. Information on how to obtain a copy of these records can be found in the specific school catalog for that college and/or in the Student Log.

# Policies

It is the responsibility of the University Financial Aid Director of Compliance and in collaboration with the Chief Academic and Compliance Officer to maintain a current Program Participation Agreement and to update the information as necessary.

# Procedures

Information is exchanged between the Chief Academic and Compliance Officer and the University Financial Aid Director of any changes that occur or may occur that require updating of the Program Participation Agreement. The changes that must be reported are found in the current Federal Student Aid handbook, Volume 2: School Eligibility and Operations.

# 3.1.1 Program Eligibility

# Policies

Bethel University offers programs that are considered an eligible program for receiving federal student aid funding as described in the Federal Student Aid handbook, Volume 2: School Eligibility and Operations. Bethel University is a private

nonprofit institution an institution of higher education that offers the following programs that are eligible for FSA purposes:

a program that leads to an associate, bachelor's, professional, or graduate degree

# Procedures

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The requirements of length of program, required credit hours, structure, recognized credential earned, and any other requirements are listed in each college's catalog and can be accessed from the Bethel University's main website listed in 1.1. All new programs must be approved by the accrediting agencies listed in the catalog.

# 3.1.2 Administrative Capability

Bethel University meets the administrative capability requirements set by the Department of Education as outlined in the Federal Student Aid handbook, Volume 2: School Eligibility and Operations. Regarding the Financial Aid office.

# 3.1.3 Financial Responsibility

The Director of Finance is responsible for all financial responsibility. See the policy and procedures handbook for that department for full disclosure.

# 3.1.4 Reporting & Reconciliation

# 3.1.4.1 Fiscal Operations Report and Application to Reports

It is the responsibility of the Director of Financial Aid Compliance to complete this report each year. Reports are pulled each year from the CAMS system to determine FSEOG and Work-study funds disbursed and additional information required, and Heartland ECI is contacted to obtain Perkins information. The report is checked thoroughly to ensure accuracy.

# 3.1.4.2 National Student Loan Data System

Bethel policy is to return Pell Federal Pell Grant, the Iraq and Afghanistan Service Grant (IASG), and Federal Supplemental Education Opportunity Grant (FSEOG) overpayments to the Department of Education rather than making the student responsible. The only exception would be if there was a reason to return funds after the year had been closed out and could not be reopened. Federal Perkins Loan information is reported by our third party servicer. **3.1.4.3 Program-Specific Reporting**  Enrollment reporting is handle through the National Student Loan Clearinghouse who Bethel submits monthly reports of enrollment. The office of University Funding reports High School and Identity report monthly. All funds are reconciled monthly by using a reconciliation roster from the COD system and a report pulled from the CAMS system and compared by Student SSN, disbursement date, amount, and type.

# 3.2 General Title IV Student Eligibility Requirements

Students must meet the following requirements to be eligible for Financial Aid:

1. To receive financial aid funding from federal, state, or institutional programs, a student must be enrolled as a degreeseeking student at Bethel University.

2. Student financial aid awards are based on full-time enrollment For purposes of definition, a minimum of 12 credit hours is considered full-time in Bethel's undergraduate programs and a minimum of 6 credit hours is full time for graduate programs.

3. You are to report to the Financial Aid Office any additional financial aid you may receive from sources other than those listed on your award letter. This could have an impact on continued eligibility for some of the "need-based" federal programs and institutional aid.

4. Tennessee Student Assistance Corporation (TSAC) Awards and Tennessee Lottery Scholarships are assigned to the first Tennessee school listed on the FAFSA. If you did not list Bethel University as your first school of choice, you must complete an Award Change Form with Tennessee Student Acceptance Corporation which can be found at http://www.tn.gov/collegepays/

5. The Bethel University Financial Aid Office reserves the right to review and cancel or adjust awards at any time due to changes in financial, marital, or academic status.

6. Students must meet Satisfactory Academic Progress to remain eligible for continued assistance from federal, state, and institutional aid. A copy of our Satisfactory Academic Progress policy is included in this packet and in our catalog.

7. Once a student has registered for classes, the student is responsible for all charges incurred.

8. Students receiving financial aid who find it necessary to withdraw from Bethel University for any reason must notify their Student Advisor. Withdrawal could cause federal aid to be returned resulting in a student owing a balance to Bethel University or to the US Department of Education. It is recommended that the student contacts the Financial Aid office for their program so we can assist them in making important decisions that affect their aid.

#### Procedures prior to package a student for aid:

The packaging worksheet that is used is comprehensive in pulling all needed data to ensure eligibility prior to packaging a student for aid. Students are checked in NSLDS for any issues that could prevent them from receiving aid such as a recent default or overpayment: SULA and Pell LEU amounts that might not have been updated since the ISIR was produced are checked in COD if student is close to limit.

#### 3.3 Federal Aid Programs in Which Institution Participates

Bethel participates in all Title IV Federal Aid Programs offered by the Department of Education. The guidelines for administering programs can be found in the Federal Student Aid (FSA handbook).

Pell Grants, Iraq and Afghanistan Service Grants, and Teach Grants vary each year. We recommend that students access the studentaid.ed.gov website for details about these programs.

The Federal FSEOG Grant is based on need and is awarded to students who demonstrate the greatest financial need (EFC =0) and are Federal Pell Grant eligible recipients. The average amount is \$500.00 per year.

Work-study is based on need and averaged at 10 hours per week. If the student requests, they can be packaged up to 20 hours a week if their need allows and funds are available. More details concerning Federal Work Study administration can be obtained through the business office who administers these funds.

Perkins Loans are awarded to the neediest student as funding allows. Repayment begins nine months after the student ceases to be enrolled at least half-time. A Master Promissory Note (MPN) and Entrance Counseling must be completed. A Bethel student must have received a Federal Perkins loan in 2014/2015 to be eligible for a Federal Perkins loan in 2015/2016.

Bethel participates in all Direct Loan programs. A student must complete both an entrance counseling (if they have not had a previous loan at any other college) and an MPN.

The time frame for disbursing the aid above is listed below:

Traditional program: Funds are ordered each term once registration is official or if there is a delay in packaging due to missing documentation to clear verification, or other issues aid is ordered within two weeks of clearing such issues.

Modular Programs: Loans Disbursements Effective August 1, 2015.

Federal financial aid disbursements for modular programs will be as follows: First

disbursement for term 1 for a new student:

The first disbursement date will be the fourth Friday after the start date of the first class in the term. If the student is packaged after that date, then the disbursement date will be the following Friday after the date of the award letter plus 14 days (allows the student 14 days to decline any loans). Setting the disbursement date as set forth allows the University to monitor attendance to ensure that the student is actively participating in the program and is a valid student.

Subsequent disbursements for future terms, if the student shows active participation in the prior term: The first disbursement date will be the first Friday after the start of the first class of the term. If the student is packaged after that date, then the disbursement date will be the following Friday after the date of the award letter plus 14 days (allows the student 14 days to decline any loans). Setting the disbursement date as set forth indicates that the student has established a pattern of active participation in course work and the financial aid office will assume that the student is going to continue this pattern.

Subsequent disbursements for future terms, if the student does not show active participation in their prior term, but is enrolled in future terms: The first disbursement date will be the fourth Friday after the start of the first class of the term. If the student is packaged after that date, then the disbursement date will be the following Friday after the date of the award letter plus 14 days (allows the student 14 days to decline any loans). Setting the disbursement date as set forth indicates that the student has shown erratic participation in the prior term. Additionally, setting the disbursement date as set forth allows the University to monitor attendance in the first course in the term to ensure that student is actively participating in the program and is a valid student.

Second disbursement for all modular program students:

When packaging a student for a financial aid term, federal loan funds will be split into two (2) equal disbursements per loan period. The second disbursement date will be scheduled halfway through the loan period. On a case-by-case basis, if the scheduling of the second disbursement places a financial burden on the student to cover the costs of other educationally related expenses, the Financial

Aid office will work with the student to meet those needs if federal regulations allow. The student will be required to provide written documentation supporting this financial burden and the burden must be considered an educational expense. The definition of educational expense can be found on the following Federal Financial Student Aid website: <a href="http://www.finaid.org/educators/higher-education-expenses.phtml">http://www.finaid.org/educators/higher-education-expenses.phtml</a>.

Active Participation Defined:

If the student has successfully completed all classes with a grade of C or better in the prior term (based upon grades posted at the time of packaging), he/she will be considered to be actively participating. Any questions concerning active participation will be resolved by the Director, Business Affairs.

Modular Programs Grant Disbursements:

Grant disbursements are set to disburse at the same time frame as the first disbursement of the loans and will be in one disbursement.

Emails are sent to the students when federal student loan funds have been received, and they are directed to their eportal to view the amounts and type of aid posted to their account.

#### 3.3 Fiscal Procedures & Recordkeeping for Separation of Duties:

Each program has its own financial aid "office" whereby each has a director that report to the Director of Financial Services, David Huss. Brandi Lee is the Financial Aid Director of the Modular Program, and Brenda Bradshaw is the Financial Aid Director of the Traditional Program.

- 1) Traditional Programs (on-campus students).
- 2) Modular Programs Modular and Graduate Programs

The University Funding Office houses the University Financial Aid Director of Compliance, the Funding Coordinator, and the Loan and Grant Origination Specialist. These fall under the direction of the University Academic and Compliance officer, Phyllis Campbell.

A students first registers, adds, drops, and makes any changes for classes through the Registrar's office. The Registrar's office then enters this information into CAMS. For modular students, the financial aid office does not package (calculation of financial aid to be received) a student until the student is actually registered for classes. For traditional students, the students are pre-packaged prior to registration, however, the aid is not ordered (as discussed below), until two weeks after the start of the semester, at which point the package is finalized.

For each financial aid office, a financial aid counselor (packager) creates a package, through an excel packaging worksheet for the student that determines what financial aid each student needs and the aid for which the student qualifies. The packaging worksheet has checks and balance built into it to flag over-awards, maximum lifetime loan limits, and maximum lifetime Pell limits. In the Traditional financial aid offices, another person enters the awarded amounts in CAMS. This allows for a high-level review of the packaged amounts and provides a check for over-awards, aid amounts, grade levels, etc. In the Modular staffed financial aid offices, these awards are entered into CAMS by the same person that packages the student.

This package is then given to another counselor (loan originator), who originates the Federal Title IV Funds (Pell, Direct Loans, Teach Grant, etc..) in EDE and sets up the disbursement dates to draw down the funds to G5. This person also performs a high-level review of the package (is there an over-award, grade level, etc..).

One week prior to the disbursement date of Title IV Federal Aid (Pell, Direct Loans, Teach Grant, etc..) a spreadsheet is compiled by the University Funding Coordinator. The data for the spreadsheet is obtained through a query from CAMS and a report from EDE for Direct Loans and Pell Grant that are due that week. The University Funding Coordinator finalizes and submits the final request for aid through the EDE system which communicates the information to the Department of Education that release the funds to the G5 online system. For traditional students, this is performed three times a year (in line with the semesters), for modular students, this is completed on a weekly basis for all Federal Title IV aid. The submittal/order to the Department of Education is usually completed on Friday. Funding appears in the G5 account on Friday afternoon or Monday. Once the funds are ordered, University Funding Coordinator compares the amount ordered to the amount requested, and reconciles any differences to be fixed in the next request. The University Funding Coordinator then notifies the business office of the amount that is ready to be drawn down from G5. The representative of

the business office requests the money through the G5 account to be deposited directly into the University bank account by Monday or Tuesday through EFT. The awards for each student whose funds were ordered are then posted to the billing batch by the University Funding Coordinator for the billing office to post to the students account the same day the funds are ordered. These batches are reconciled to the G5 report to ensure the totals are appropriate. A print out of the batches and the totals from G5 are printed and kept in the University

Funding Coordinator's office for review at any time. The University also prepares a monthly reconciliation of the drawdown from the G5 report to the amount credited to student accounts.

State aid (TSAA, TN Hope Lottery, TN Foster Grant, etc.) is ordered and received monthly for the modular based program and three times a year for the traditional program. State aid is ordered by the University Funding Coordinator through the State of Tennessee E-Grands system. The University Funding Coordinator monitors the payment system and notifies the Business Office that funds have been received by EFT. The University Funding Coordinator then transfers the funds to the billing batch. The business office then posts the batch to the students' account.

Any additional state aid such as Work Force Investment, Vocational Rehabilitation, and Tuition Assistance is ordered by the University Funding Coordinator through the appropriate agency and notifies the Business Office when the funds have posted to our bank account. The University Funding Coordinator then transfers the funds to the billing batch. The business office then posts the batch to the students' account.

Campus-based aid, scholarships, and all other aid is posted to a billing batch by the designated person for each college and then transferred to the student's account by the business office. Campus-aid is drawn down several times a year. Bethel Scholarships are posted on the appropriate disbursement date. Outside scholarships are posted to the billing batch by the University Funding Coordinator once the check/EFT has been received by the business office or the institutional advancement office.

#### 3.4. State Programs

Bethel University participates in the following state aid programs.

TSAA Tennessee Grant, Hope Scholarship, Hope Access Grant, Dual Enrollment Grant, Foster Child Tuition Grant, Helping Hero Grant, Tennessee Promise Scholarship, Vocational Rehabilitation Grant, Work Force Investment Act Grant.

Since each state aid program has its own rules and regulations, they will not be defined in this handbook but can be found on the following website: <u>https://www.tn.gov/collegepays/section/students-and-parents</u>. Any additional policies implements by Bethel University are listed below.

Students are notified that they are eligible for these grant by the state agencies that awards the grants and also by Bethel on their award letter.

The Traditional office and the Modular office are responsible for awarding the funds and setting the disbursement date. The Office of University funding is responsible for ordering the funds and post the funds to the billing batches. The Business Office is responsible for posting the funds to the student's account.

The packagers for each program are responsible for ensuring that the student is eligible for aid at the time the student is packaged.

Eligibility for state grants are checked prior to releasing funds in the following manner: Traditional: Student registration and hours are checked before informing BU Funding office funds are ready to order.

Modular: A report is run by the University Funding Office checking registration and hours prior to ordering funds.

#### 3.5 Institutional Aid Programs

All institutional aid and their specifications can be found in the college catalog for each program.

# SECTION 4: INSTITUTIONAL REQUIREMENTS RELATING TO EDUCATION LOANS

#### 4.1 Private Education Loan Disclosures

Bethel University does not have a preferred lender list.

#### 4.3 Private Education Loan Applicant Self-Certification

All private student loans are originated through the Great Lakes program. The University Funding Office receives a notice from Great Lakes that a student has applied for a private loan. They contact the program Financial Aid Director for them to determine the amount the student is eligible to receive without exceeding the cost of attendance. The University Funding Office then orders the amount approved and post the funds to the billing batch when then funds are received by Bethel University. The funds are then transferred to the student's account by the Business Office.

#### **SECTION 5: STUDENT CONSUMER INFORMATION REQUIREMENTS**

#### 5.1 Notice to Enrolled Students

Each year all students are emailed notification on where to find all of the consumer information that is required by federal regulations on the website. This Director of Academic and Compliance can be contacted to obtain this information. The information can be found on the following website: <u>http://www.bethelu.edu/consumer-information</u>

#### 5.4.1 Entrance Counseling

All student who has never had a prior student loan are required to complete entrance counseling at studentloans.gov

#### 5.4.2 Exit Counseling

#### Policies

#### Federal Loan Exit Counseling

All students are required to complete a loan exit counseling when they drop below half-time, withdraw, or graduate. Students are sent a loan exit counseling letter from the Financial Aid Office when these enrollment statuses occur directing the student to complete their counseling online at <u>www.studentloans.gov</u>. The notice will contain all of the elements as required by DL: 34 CFR 685.304(b). The Financial Aid staff for each program is available during normal office hours to answer any questions the student might need answered. Students who are not actively attending courses or who have withdrawn are mailed a loan counseling exit letter, students who drop below ½-time or who have applied for graduation and are still actively enrolled in classes are emailed an exit letter to their Bethel University email account.

#### Procedures

# Students Currently Enrolled in Courses Who Have an Active Bethel Email Account:

Traditional Program: On November 1, April 1, and July 1 each year the person designated to notify students concerning exit loan counseling should request an applied graduation list from the registrar's office. Loan Exit Counseling letters should be emailed to the students' Bethel University email accounts.

# Modular Programs:

The confirmed credential list is accessed monthly for a list of students who have met the requirements for graduation.

Students who have dropped below 6 hours for undergraduate and 3 hours for graduate programs will be emailed a Loan Exit Counseling letter immediately once enrollment status has been confirmed.

# \*Once an exit has been mailed or emailed to the student a copy of the exit letter must be maintained in the student's electronic file for accurate record keeping.

After 25 days the person designated to notify students concerning exit loan counseling should review the completed exit counseling lists located on the X-Drive > Financial Aid > NSLDS Exit Reports to review what students have completed the exit counseling. If the exit counseling has not been completed, then the student will be physically mailed an exit letter to their home addresses. This letter must be saved in the student's file with a notation that it was physically mailed and the date it was mailed. The letter must be mailed within 30 days of the first letter if the student did not complete the online counseling session on www.studentloans.gov.

#### Students Currently <u>NOT</u> Enrolled in Courses Who Have an Active Bethel Email Account:

Loan Exit Counseling letters should be physically mailed to all students to their home addresses who are not actively attending classes.

Students who have dropped below 6 hours for undergraduate and 3 hours for graduate programs should be physically mailed a Loan Exit Counseling letter immediately upon determining the enrollment status to their home addresses if they are not actively attending classes.

Students who are determined to be withdrawn either by the student actively withdrawing, those who are administratively withdrawn, or those determined to be not attending classes should be physically mailed a Loan Exit Counseling letter immediately upon determining the withdrawn status to their home addresses if they are not actively attending classes.

# Once an exit has been mailed to the student, a copy of the exit letter must be maintained in the student's electronic file for accurate record keeping.

#### SECTION 6: APPLICATIONS & FORMS

#### **6.1 APPLICATION PROCESS**

Students must use the Free Application to apply for Federal and State Aid for most programs. The state contacts the student for any additional applications that must be completed to receive aid. Bethel does require that the student who is awarded the TN Hope Scholarship notice stating they understand the rules and regulations set forth by the state to continue to receive this aid. There are a few institutional aid programs that students must complete the forms to be eligible to receive and these are available on the Financial Aid page of the Bethel website.

It is the student's responsibility to submit the FAFSA. However, the financial aid office does supply computers and staff to assist the student in the process if requested. It is the responsibility of the student to add Bethel University to their ISIR.

A report is run daily for the Verification staff to review new ISIRs received and those who are chosen for Verification. Some of these reports are viewed daily, and the remaining reports are reviewed week. The system is set up to automatically load document tracking alerts for all situations that must be addressed by the financial aid office by using the Comment Code book published each year. A person from each program is designated to clear any issues to ensure eligibility.

#### 6.4 Document Assignment, Collection, & Tracking

All forms, other than verification documents are the responsibility of the admission staff or packaging staff to notify the student and collect the documents.

Verification document emails are sent out each Monday notifying all students chosen for verification of any missing documentation. If no response is received after three tries, the student is called and/or emailed. If still no response is received the student's advisor is contacted to assist in helping the financial aid office contact the student. The student completes the documents through our electronic system, Dynamic Forms. The verification staff accesses this system to obtain the forms and upload them into our CAMS system. If the form is incomplete, it is sent back to the student via Dynamic Forms with and explanation of what is missing. The verification staff is responsible for reviewing the documents to ensure they are completed correctly prior to summiting to the verification team.

# SECTION 7: FILE REVIEW

#### 7.1.1 Selection of Applicants to be Verified

Bethel verifies all undergraduate that are chosen for verification by the DOE. Bethel does not verify Graduate students if the only are receiving non-need based aid. If they are eligible for aid that is need-based, the student will be verified. Students must be verified before process aid. On a case-by-case basis and an exception will be made if there are issues that keep the student from obtaining the documentation. In these rare cases, the student will be packaged for unsubsidized loans only until verification is completed. Other rare occasions that exceptions may apply are listed in the FSA handbook.

When loading the ISIRs in the system, they are automatically identified if they are chosen for verification by loading the required documents in document tracking.

#### 7.1.2 Acceptable Documentation & Forms

The Department of Education (ED) publishes a notice in the *Federal Register* annually which details acceptable documentation for Free Application for Federal Student Aid (FAFSA) information subject to verification for a given award year. Bethel follows these requirements.

The student is asked to submit the requested documentation with 14 days, but it must be received and process no later than the end of the semester. If the student does not meet this deadline, they could possibly lose financial aid assistance.

The verification worksheets can be found on Bethel University financial aid website at <u>http://www.bethelu.edu/financial-aid-forms</u>

Bethel adheres to all regulations set forth in the Application and Verification Guide issued by FSA.

Verification document emails are sent out each Monday notifying all students chosen for verification of any missing documentation. If no response is received after three tries, the student is called and/or emailed. If still no response is received, the student's advisor is contacted to assist in helping the financial aid office contact the student. The student completes the documents through our electronic system, Dynamic Forms. The verification staff accesses this system to obtain the forms and upload them into our CAMS system. If the form is incomplete, it is sent back to the student via Dynamic Forms with and explanation of what is missing. The verification staff is responsible for reviewing the documents to ensure they are completed correctly prior to summiting to the verification team.

#### 7.1.3 Data Elements to be Verified

The DOE publishes a notice in the *Federal Register* annually, which identifies the FAFSA information subject to verification for each award year. Bethel does not verify any additional information unless there is conflicting information.

Verification of files is outsourced to EdFinancial Services who is hereby known as the Verification Team. Attached at the end of this document are the procedures that they use to process the files. They also handle all conflicting information in the verification process.

Fraud cases are handled in accordance with the regulations set by the department of Education.

Once verification is completed, the student is emailed by the Verification Team to advise them of any changes and that the correction has been made based on the documents provided by the student and/or parent. Since students are not packaged for aid prior to verification, we do not normally have to contact student concerning a change in awarded amounts. However, in cases where a student was picked for verification after they were awarded the student is sent a revised award letter letting them know the changes in aid.

## 7.2 Database Matches, Reject Codes, & C-Codes Clearance

The system automatically identifies the students with these issues when ISIRs are loaded, and designated staff member is required to clear these issues prior to the student being packaged for aid. These codes are cleared by following the regulations as stated in the FSA handbook.

#### 7.3 Review of Subsequent ISIR Transactions – Post-screening

Subsequent ISIRs must be reviewed by the financial aid office to ensure that students remain eligible for funding. Students can go into default or be chosen for verification after the first ISIR is used to package the student. A report is run each morning, and a designated staff member is assigned the task of reviewing these transactions to ensure eligibility. The documents are loaded automatically into the CAMS system, and reports are pulled daily and weekly and reviewed for issues. If a student becomes ineligible for aid, the financial aid package is reviewed to determine when the ineligibility occurred and if any aid needs to be returned. If the student change causes them to become eligible for aid, the student is repackaged based on the new eligibility.

# SECTION 8: STUDENT BUDGETS

#### 8.1 Various Student Populations

All students who are in the Traditional Program are packaged using the same budget costs for all items except tuition. An average cost was considered based on housing costs both off and on campus, and the amounts were compatible in price. The amounts were based on 30 weeks of instructional time. Modular Programs also use the same budget but is broken down based on the number of weeks as the programs vary in weeks in an academic year.

# 8.2 How Budgets are Derived & Updated

#### Tuition and Fees are set by the Board of Trustees each year.

Books and supplies are estimated based on the average amount spent for traditional students on books of \$120 per course times 5 courses per semester, and the exact costs spent on programs that have a set cost per book. Room and board are set by the Board of Trustees, and these figures are used for off-campus students as well. When compared to EPI.org and expatistan.com cost of living expenses per week ran approximately the same amount as room and board charges on campus. Transportation is calculated at 40 miles per day at .50 cents per mile. Personal costs were considered to be \$50 per week. Mileage was not used for online programs as the student is not required to travel to class or a library as both services were provided online. An additional budget cost for internet access was included in the budget for these students. Budget components are updated annually. If a student feels that they have additional costs that exceed the cost of attendance budget that have the right to appeal and provide documentation showing the additional expenses.

# SECTION 9: AWARDING & PACKAGING FINANCIAL AID

#### 9.1 Packaging Philosophies

Students are packaged for the maximum Federal and State aid available to them without exceeding their cost of attendance budget, next is any gift aid, then Intuitional Aid is applied, and student loans are awarded last.

#### 9.2.1 Campus-Based Program Amounts

Bethel University does not deduct administrative costs from any campus-based programs. This decision is made by the University Director of Financial Aid Compliance and the President of the University.

#### 9.3 Packaging Groups

Packaging philosophies are not different for different categories of the student or different groups. The only difference are the Traditional Programs are eligible for Bethel Scholarships and the Modular Programs are not eligible for any Bethel Scholarships and set forth by the Board of Trustees.

#### 9.4 Determining Award Amounts

Federal and state aid amounts are determined by the entities who administer the funds. Bethel University Scholarships amounts are determined by the program which administers those particular scholarships. Academic scholarships are set by the University President. FSEOG award amounts are determined to provide the most students with aid as stated in 3.3

#### 9.5 Package Construction

Students are packaged after verification is complete. Federal and State gift aid are applied first, then an additional gift aid or scholarships, and loans are applied last. Aid is decreased if the student has exceeded their cost of attendance in the reverse order it was awarded. All students are manually packaged using an automated spreadsheet that populates all of the data required to ensure eligibility.

Traditional Program: Students are packaged by the staff, and the packages are review randomly by the Financial Aid Director for that program. All packages are also reviewed a second time by the loan originator to catch any errors in amounts or over awarding.

Modular Programs: These packages are not reviewed by the Financial Aid Director or any other staff member unless the packager is new. All packages are also reviewed by the loan originator to catch any errors in amounts or over awarding.

#### 9.6 Packaging Other Educational Resources

If a student receives aid from other resources, the information is provided to Director of Financial Aid for the program by University Funding Office. If the student has already been packaged, the package is revised to ensure the student has not been over-awarded. If they have aid is adjusted according to section 9.5.

#### 9.6.1 Vocational Rehabilitation Benefits (VR)

If the student is eligible for VR, a budget is sent to the VR counselor, and they determine the amount of aid the student is eligible to receive. This process is handled through the states EGrands system.

#### 9.6.2 Company Reimbursement Assistance

If a student is eligible for company reimbursement that they intend to use to assist them with educational expenses, this is notated on the Financial Contract the packager reviews prior to awarding aid. If a yearly amount is listed, this is the amount used. If an amount is not listed the average amount of \$5000.00 per year is used as this is the most common amount. This amount is not listed on the award letter but is listed as a resource on the packaging worksheet to determine need when awarding need and non-need based aid.

#### 9.8 Summer Awards

Traditional Program: Summer is treated as a trailer for the Traditional Program. All aid is awarded for the Fall and Spring terms. We do allocate a percentage of SEOG funds for use for Summer students who decide to attend and for nursing students who go year-round. We also advise the students only to take the amount of loans they absolutely need so they have some available for summer should they need them. FWS funds are also awarded as summer as a trailer.

Modular programs: Summer can be either a trailer or header for the Modular program based on when the student starts and what is best for the student to provide them the aid they need to graduate. We use both a SAY and BBAY mixture on a case by case basis depending on the best option for the student.

Each student file is evaluated to determine how many hours they have left and the best options available to them based on the dates and time of their terms since they have continuous enrollment.

Traditional Summer EFCs are based on months either a one or two month EFC from the ISIR depending if the student attends one or both summer sessions.

Modular summer EFCs are based on the weeks of enrollment per term.

Yearly amounts are monitored to ensure students are not over-awarded in an academic year by checking the system to see what aid they have received prior to packaging.

#### 9.9 Award Package Notification

Students are emailed a notice that their awards are ready to be viewed in their e-portal with information on accessing the portal. The email lets the student know that we use the passive approach to disbursing aid and that the student has 14 days to decline any or all aid. An information packet is included with all Modular Program emails, and the information is provided on the portal of all students. See attachment 9.9A. After 14 days all aid will be disbursed to the student if it is not declined. The portal clearly displays the type of aid, clearly distinguishes grants from loans, and provide the student the ability to decline any aid. It also displays the amounts of the aid and the expected disbursement date. It distinguishes between Perkins, Direct Subsidized,

Direct Unsubsidized, Direct Parent Plus, and Direct Grad Plus loans and shows the gross and net amounts of each loan.

# 9.9.1 Packaging Appeals – Professional Judgment Requests

Most appeals are completed after the verification process to determine if the parent or student has special circumstances that they feel could affect the amount of aid they are receiving based on extenuating circumstances. The students are informed about Professional Judgments during the admissions process and when they contact the Financial Aid office with financial concerns. The form can be picked up or emailed to the student. The Financial Aid Director of the program or their designee reviews these appeals and then makes their recommendation to the University Financial Aid Director of Compliance. The University Financial Aid Director of Compliance reviews the documentation and makes an independent decision based on the evidence involved. If needed, the Director of Finance is also consulted for a third opinion. Forms in appendix 9.9.1A

# 9.9.2 Award Package Revisions

Award packages are revised due to an increase in aid eligibility, an increase or decrease in enrollment, or an error in packaging. Once notified of an issue where change is required the change is processed within 14 days.

# 9.10 Overawards & Overpayments

Student files are audited by the loan originator to monitor over award or overpayments. If funds are received that are not expected the Funding Coordinator contacts the Director of Financial Aid for the specific program to let them know that funds have been received that were not in the student's original award package. Bethel University returns all Federal and State overpayment directly back to these entities unless the award year is closed. If the award year is closed for Pell Grant or FSEOG grants, Bethel will ask the DOE to process the overpayment and Bethel will process the required paperwork to turn it over to the DOE for collection.

# 9.10.1 Resolving an Overaward or Overpayment When Student is Liable

There are several options for resolving overpayment, reducing or canceling loans is always the first option used, reducing FWS employment, reducing Bethel Scholarships, invoking the \$300 tolerance, or increasing the

student's budget if warranted. Resolving the overpayment is address above. A new packaging sheet is created for any changes in awards to determine eligibility and the students are either sent a new award letter or an email that their award amounts have changed and why.

#### 9.10.2 Resolving an Overaward or Overpayment When School is Liable

If the over award or overpayment is the result of an error on the school's behalf the funds are returned to the proper entity and the Director of Finance is contacted to decide if the school will write off the error or make the student responsible for paying the balance created from the over-award.

# Section 10: Professional Judgment (PJ)

See section 9.91 concerning verification appeals.

#### 10.2 Circumstances for Which PJ Adjustments are Allowed and Resulting Actions Taken

Reduction in Income Need for Dependency Override Satisfactory Academic Process appeal – See SAP section for reasons Loss of Lottery Appeal Delayed Second Loan Disbursement Appeal Non-Limitation of Unsubsidized Loan to Ensure Graduation Appeal.

Circumstance that warrants an appeal: Loss of employment Separation or divorce Death of a spouse Unusually high out of pocket medical bills Unusually high dependent care Excessive cost of attendance Parent in school Conversion of traditional IRAs to Roth IRAs Natural disaster Abusive family relationships Parents' refusal to provide any documentation Reasoning of why unsubsidized loans should not be limited

The Financial Aid Director or their appointee is responsible for making any adjustments required and for notifying the student of the result of the appeal by the student's Bethel email account.

#### 10.4 PJ Documentation

Document required is listed on most forms. In unusual circumstances the documents required are handled on a case by case basis. The student or parent is notified by email the documents required in these cases. Failure to submit complete and accurate documentation will result in a denial of the appeal. The student or parent is welcome to reopen the appeal should the additional document be provided.

# Section 11: Disbursements

# 11.1 Definition of Disbursements and Disbursement Methods

Bethel University is on Cash Management I for the disbursement of funds. The funds are ordered from COD and posted to the student's account on the same day and not when the funds are received by Bethel.

Students are issued their credit balance created by federal funds within 14 days that the credit balance occurs. These funds are normally completed by EFT transfer to the student's designated bank account. Although this method is highly preferred and encouraged, if the student prefers not to use this method the student is provided a check.

A student may request a book voucher to purchase their books through our bookstore, or if they have enough Title IV aid to cover all of their allowable charges and are still due a refund, the amount need for books is refunded to them within the 7 days to purchase the books from some other location.

#### 11.2 Disbursement Dates and Schedules

 Traditional Payment Period:

 Fall 2015 through Spring 2016:
 8/17/15 to 5/6/16

 Summer 2016:
 5/31/16 to 8/1/16

Modular: The payment period varies depending on the start and end date of each group. There are no set start calendar start dates, but programs can start at any time throughout the year.

Traditional Disbursements of Title IV aid: See section 3.3 Modular Disbursements of Title IV Aid: See section 3.3

Late and post-withdrawal disbursements will be made in accordance with the regulations set by the DOE and with the student's approval.

The Funding Coordinator and the Director of Finance work together to determine the timing of disbursements to ensure what is best for the student while still meeting federal regulations.

Students have access to their e-portal account 24 hours to access anticipated disbursement dates of any funds on their account.

Late disbursements approved by the Financial Aid Director and by the Director of Financial Funding.

# SECTION 12: SATISFACTORY ACADEMIC PROGRESS



SATISFACTORY ACADEMIC PROGRESS (SAP) FOR RECEIVING FINANCIAL AID

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have 128 hours completed to graduate, 128 X
150% = 192 hours maximum. Graduate level 36
hours completed to graduate=54 maximum hours



FINANCIAL AID OFFICE **325 CHERRY AVENUE** MCKENZIE, TN 38201

# SATISFACTORY ACADEMIC PROGRESS APPEAL PROCESS

#### Students whose financial aid was cancelled due to not meeting all three measurements of SAP may be eligible to appeal for reinstatement. THE PURPOSE OF THE SAP APPEAL

The purpose of the SAP Appeal is to allow a student to explain the circumstances that interfered with their ability to meet SAP standards during the most recent payment period.

#### STEPS FOR APPEALING

1. Complete the Bethel University Satisfactory Academic Progress Appeal Form.

2. Attach a formal letter, describing in detail the extenuating circumstances that prevented the student from maintaining SAP, and what has changed that would support maintaining SAP in the future.

3. Submit the SAP Form, formal letter, and required documentation to the Bethel University Financial Aid Office that administers the student's program.

4. Acceptable documentation is listed on the SAP appeal form. Appeals submitted without the required officia documentation will be denied. If the Financial Aid office that administers the student's program requires further information or clarification from a student, then it will request additional documentation via the student's Bethel email address. All documentation submitted is confidential to the extent permitted or required by law.

#### DURING THE APPEAL PROCESS

Students requesting an appeal are ineligible to receive Financial And funding 705 defermeets of a synthest Auntil the cademic progress and approved. An appeal has been processed and approved.

be denied. If the student registers for classes during the **TRAPSEFP SCESS ENDS** should make payment arrangements

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#### APPEAL APPROVAL

graduation requirements achieve un hative and point averages.

circumstances have changed to ensure future success, and reasonable ability to achieve SAP prior to graduation. If the appeal is approved the student must be meeting all three SAP measurements at the end of the probationary payment period or be successfully following an academic plan designed for the individual student to achieve SAP at a determined reasonable period of time.

#### ACADEMIC PLAN

If a student is unable to meet all three SAP measurements within one payment period they will be placed on an academic plan. The student will need to meet with their advisor to develop a plan of study. The plan of study will detail the exact courses and hours needed for the student to graduate. The student must adhere to the plan of study, attempt and satisfactorily complete 12 or more credit hours per payment period, and maintain a minimum 2.5 GPA for the payment period. Based on these requirements a deadline will be set based on each individual student's academic plan of when the student can reasonably begin meeting all three SAP measurements and will be removed from the probationary status.

#### APPEAL DENIED - MAKING UP DEFICIENT CREDIT HOURS WITHOUT AID

In the event that the student does not qualify for an appeal, they may be eligible to have financial aid reinstated by the following actions:

1. Attend Bethel University or another school at their own expense until they are again meeting all of Bethel University's SAP requirements. The student would be reinstated under the Financial Aid Warning status. AND

2. Notify the Financial Aid Office administering aid for their program when they have met all SAP measurements and provide supporting documentation.

students. All transfer credit hours accepted by Bethel

REPEAT PRESENCE THRESHOLD AND THRESHOLD is dependent on the property of the provide the pr



# Satisfactory Academic Progress Appeal Form

Students whose financial aid was cancelled due to not meeting all three measurements of Satisfactory Academic Policy (SAP) may be eligible to appeal for reinstatement. If there were extenuating circumstances that orevented the student from meetme.SAP comolete the stens.belo

2. Attach a formal letter, describing in detail the extenuating circumstances that prevented the student from maintaining SAP, and what has changed that would support maintaining SAP in the future.

3. Submit the SAP Form, formal letter, and required documentation to the Bethel University Financial Aid Office that administers the student's program.

4. Acceptable documentation is listed below depending on the reason for the appeal. Appeals submitted without the required official documentation will be denied.

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illness, mJury or disability			person in the	e student s me		
Documentation Re			Doc	cumentatiOn Req	uirea	
Provide a statement from the treating physician explaining the type of illness or injury, date the illness or injury began, and length of the illness or injury. This must also be accompanied by a statement from the treating physician on when the student can return to school.		Provide documentation (e.g., a physician's statement, police report or documentation from a third party professional, such as a hospital billing statement), related to the individual for whom the student rovided care or su rt.				
Death of a family member of student's life		in the	Unu control	sual circumstar	nces beyond th	ne student's
Provide a copy of a death certificate	or an obituary showing	g the	Doc	cumentation Req	uire </td <th></th>	
_student's relationshi_to the deceased.		Provide official documentation supporting the unusual circumstances.				
The student's own di	vorce or the divorc	e of the				
student's parent(s)			Natural Disa	asters		
Documentation R	equired					
Provide an attorney's letter on law	firm's letterhead, petitio	on for dissolution,	Doc	cumentation Req	luirea	
or copy of divorce decree.			Provide a writt official source s	ten statement and/or such as FEMA.	r supporting docu	iment(s) from an
Exceeding the 150% maxim	num time limit m	neasure while	in a second underg	graduate or dua	al degree prog	gram OR as a
result of changing the studer	it's major or excess	s transfer units				

	Documentation Required
Meet with the student's advisor and provide a	_plan of study signed by the advisor detailing the exact courses and hours needed to graduate.

Traditional Program:The Financial Aid Director monitors SAPModular Program:The packagers and drop staff monitor SAP.

# SECTION 13: RETURN OF TITLE IV FUNDS

# 13.1 Process Overview & Applicability

**Traditional Program:** The registrar notifies the financial aid office when a student officially or unofficially withdraws. If it is an official withdrawal, the student is required to come by the financial aid office for counseling and to have their withdrawal form signed. The withdrawal date is determined by the Registrar's office and is entered into the system for reporting to NSLDS. If a student unofficially withdraws then, the financial aid office tries to determine the last date of participation in a class. If they are unable to do so, then the 50% rule applies as the traditional program is not a program that is required to take attendance. The Financial Aid Director calculates the return of Title IV funds. It is both the responsibility of the Financial Aid Director and the University Funding Office to ensure funds are returned in a timely manner. The Financial Aid Director is responsible for submitting a letter to the student letting them know the details of the returned funds. Bethel submits repayments to the DOE and does not leave it to the responsibility of the student; up to the school amount for loans and all grant amounts. The Financial Aid Director is responsible for handling any tracking of post-withdrawal disbursement requests.

**Modular Program:** The registration staff notifies the financial aid office when a student officially or unofficially withdraws or drops a course. A student unofficially withdraws if they fail to attend courses and the withdrawal date is the last date of participation in a course. Modular programs are required to take attendance. If a course is dropped, then the drop staff in the financial aid office must determine if they have received notice of the intent to continue. If they have not then the drop is handled as a withdrawal. If it is an official withdrawal the withdrawal date is determined by the student advisor and the date the student contacted them is written on the form as the official date of withdrawal. This date is entered into the system for reporting to NSLDS. The drop staff calculates the return of Title IV funds. It is both the responsibility of the drop staff to and the University Funding Office to ensure funds are returned in a timely manner. The drop staff is responsible for submitting a letter to the student letting them know the details of the

returned funds. Bethel submits repayments to the DOE and does not leave it to the responsibility of the student; up to the school amount for loans and all grant amounts. The drop staff is responsible for handling any tracking of post-withdrawal disbursement requests.

# **Traditional Office:**

A snapshot of enrollment is made each term at the end of the official registration period as published by the University. No adjustments are made for financial aid after this date in the case of a student processing a drop form and changing the enrollment hours unless the student officially withdraws or ceases to attend all classes.

Students who enroll and formally withdraw are subject to a recalculation of any federal, state, or institutional aid that was received during the term. Federal regulations mandate a recalculation of Title IV funding (Federal Pell, SEOG, Federal Stafford/Parent Plus/Grad Plus/Perkins Loans) based on the number of days in the term versus the number of days the student attended classes (as determined by the date of withdrawal). This calculation gives a percentage, and if the percentage is greater than 60%, no Title IV funds must be returned. If the percentage is equal to or less than 60%, then a recalculation of Title IV fund eligibility must be completed based on the time the student did attend classes with a set policy on what funds are returned first. Students who fail to withdraw formally and/or cease attending classes (unofficial withdrawal) may have 50% of federal funds returned per federal regulations. Students who receive all "FA" grades (failure for non-attendance) could also have financial aid funds returned.

Modular: DROPPING A MODULE: If a student drops a module, a portion of their Financial Aid could be affected. If a student's enrollment status changes the percent of earned Federal or State Grant aid that is dependent on enrollment status will be adjusted. If a student's originally enrollment status was full-time in a term or semester, the chart below is an example of aid earned.

UNDERGRADUATE					
Number of credit hours enrolled per term	Enrollment Status	% of aid earned	% of aid not earned that must be returned		
12 or more	Full-Time	100%	0%		
9 to 11	3/4-Time	75%	25%		
6 to 8	1/2-Time	50%	50%		
1 to 5	Less Than 1/2 Time	grants that can be kept that grant and the adjus contact the Financial Ai	If a student drops below half-time, the percentage of grants that can be kept is based on the regulations for that grant and the adjusted Cost of Attendance. Please contact the Financial Aid Office for the percentage amounts for each type of aid.		

	GRADUATE			
Number of credit hours enrolled per term	Enrollment Status	% of aid earned	% of aid not earned that must be returned	
6 or more	Full-Time	100%	0%	
3 to 5	1/2-Time	50%	50%	
1 to 2	Less Than 1/2 Time	If a student drops below half-time, the percentage of grants that can be kept is based on the regulations for that grant and the adjusted Cost of Attendance. Please contact the Financial Aid Office for the percentage amounts for each type of aid.		

#### WITHDRAWING FROM A MODULAR PROGRAM:

When dropping a module that the student is currently attending or about to begin Bethel University must determine if the student is considered to be withdrawn. A student is considered withdrawn, for Title IV purposes, if the student ceases attendance at any point prior to completing the payment period or period of enrollment, unless the school obtains written confirmation from the student at the time of the withdrawal that he or she will attend a module that begins later in the same payment period or period of enrollment. In order to prevent additional unearned aid from being returned, when a course is dropped the student must complete a Notice of Intent form. The Notice of Intent states that even though the student is dropping a course, they will continue attending future courses with Bethel University within the same payment period. This form can be found on the student website with instructions on where to email the form. It must be received by the Financial Aid Office within 7-days of the dropped course, or the assumption will be that the student is withdrawing.

Federal law requires schools to calculate how much federal financial aid a student has earned if that student:

• Completely withdraws, or Stops attending before completing the semester, or

• Does not complete all modules (courses which are not scheduled for the entire semester) for which he/she has registered at the time those modules began.

• Does not complete a Notice of Intent form within 7 days of dropping a course and the student is not currently attending any courses.

The law specifies how Bethel University must determine the amount of Title IV program assistance that the student earns if they withdraw from school. The Title IV programs that are covered by this law are Federal Pell Grants, Iraq and Afghanistan Service Grants, TEACH Grants, Stafford Loans, PLUS Loans, Federal Supplemental Educational Opportunity Grant (FSEOG) and Federal Perkins Loans.

When a student withdraws during their payment period or period of enrollment (Bethel University can define these for the student and tell them which one applies), the amount of Title IV program assistance that they have earned up to that point is determined by a specific formula. If a student is received (or Bethel University or the student's parent received on their behalf) less assistance than the amount that the student earned, they may be able to receive those additional funds. If the student received more assistance than they earned, the excess funds must be returned by the school and/or the student.

The amount of assistance that a student has earned is determined on a pro rata basis. For example, if the student completed 30% of their payment period or period of enrollment, they earn 30% of the assistance they were originally scheduled to receive. Once they have completed more than 60% of the payment period or period of enrollment, they earn all the assistance that they were scheduled to receive for that period that is not based on the enrollment status of full-time,  $\frac{1}{2}$  time,  $\frac{1}{2}$  time, less than half-time. Aid based on enrollment status such a Federal or State Grants will be adjusted accordingly.

If a student did not receive all of the funds that they earned, they might be due a Post-withdrawal disbursement. If the student's Post-withdrawal disbursement includes loan funds, Bethel University must obtain permission from the student before it can disburse them. A student may choose to decline some or all of the loan funds so that they don't incur additional debt. Bethel University may automatically use all or a portion of the Post-withdrawal disbursement of grant funds for tuition, fees, and room and board charges (as contracted with the school). The school needs the student's permission to use the Post-withdrawal grant disbursement for all other school charges. If the student does not give their permission (some schools ask for this when the student enrolls), they will be offered the funds. However, it may be in their best interest to allow the school to keep the funds to reduce their debt at the school.

There are some Title IV funds that the student may be scheduled to receive that cannot be disbursed to the student once they withdraw because of other eligibility requirements. If the student receives (or Bethel University or the student's parent receives on the student's behalf) excess Title IV program funds that must be returned, Bethel University must return a portion of the excess equal to the lesser of:

- the student's institutional charges multiplied by the unearned percentage of their funds or
- the entire amount of excess funds.

The school must return this amount even if it didn't keep this amount of the student's Title IV program funds.

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If Bethel University is not required to return all of the excess funds, the student must return the remaining amount. Any loan funds that the student must return, they (or their parent for a PLUS Loan) repay in accordance with the terms of the promissory note. That is, the student makes scheduled payments to the holder of the loan over a period of time.

Any amount of unearned grant funds will be returned by Bethel University to the DOE. The requirements for Title IV program funds, when the student withdrew, are separate from any refund policy that Bethel University may have. Therefore, the student may still owe funds to the school to cover unpaid institutional charges. Bethel University may also charge the student for any Title IV program funds that the school was required to return. If they do not already know what Bethel University's refund policy is, they can ask Bethel University for a copy. Bethel University can also provide the student with the requirements and procedures for officially withdrawing from school.

If a student has any questions about their Title IV program funds, they can call the Financial Aid office that administers their program at Bethel University. For general information concerning Title IV program funds, they can contact the Federal Student Aid Information Center at 1-800-4-FEDAID (1-800-433-3243). TTY users may call 1-800-730-8913. Information is also available on Student Aid on the Web at <u>studentaid.ed.gov</u>.

#### 13.1 R2T4 notification

Notification to the Business Office once Withdrawal notices are received by the Financial Aid Office, and R2T4 calculations are performed.

The person in the Financial Aid office completing the R2T4 calculations for all students determined to be withdrawn should notify the business office once the calculation is complete.

The drop form created by the Financial Aid Director of Compliance for processing of the returns will include a workbook in the spreadsheet that contains the information need for the Business Office to determine that all unearned aid has been returned and any credit balance resulting from the remaining Title IV funds should be issued to the student. The notice will include the amount and type of aid that is being returned. If no aid is being returned, this information will be noted as well. This form should be saved in PDF format and emailed to the person designated by the business office to expedite the refund of any credit balance.

This process will ensure that the Business Office is aware of all withdrawn students, know that all Title IV funds have been returned. This allows them to expedite the refund process ensure that refunds are processed within the timeframe allowed by the Department of Education.

#### 13.2 Leave of Absence

Bethel does not have an official leave of absence.

# SECTION 14: INSTITUTIONAL REFUNDS

The institutional refund policy can be found in the current catalog of each program.