

College of Wilmington



College of Wilmington

Financial Aid Procedure Manual

2020-21

Table of Contents

Purpose	4
Mission Statement	4
Admission Policies	4
Financial Aid Policy	5
Applying for Financial Aid	6
Verification Policy	9
Professional Judgement	9
Types of Aid Available	11
Veteran Benefits	14
Entrance Loan Counseling	16
Master Promissory Note	17
Exit Loan Counseling	17
Education Requirements	18
Intellectual Disabilities	18
Legal and Other Requirements	19
Independent Student Definition	20
Dependent Override Policy	20
Fraud Policy	21
Confirmation of Citizenship	21
Student File Documentation	23
Transfer Monitoring Process	23
Family Educational Rights and Privacy Act of 1974 (FERPA) Policy	23
Default Management	24
Refund Policy	25
Withdrawals	26
Re-Entry	27
Return of Title IV Funds	28
Student Loan Code of Conduct	28
Determining the Loan Period	29
Direct Loan Assurance Policy	29
Satisfactory Attendance Progress	36
Scheduled Evaluations and Time Frame for Completing	37
Special Grading Circumstances	38

Determination of Progress Status	38
Warning	39
Appeal	39
Probation	39
Reinstatement	39
Drug Awareness	39
Security Program	39
Internal Control/Registrar/Business and Finance	40
Student's Right to Know	43
Campus Crime Information	43
Net Price Calculator	43
Graduation, Retention, and Placement	43
Definitions	44

Purpose

This Financial Aid Policies and Procedures Manual is a publication of the Financial Aid Office of College of Wilmington. Its purpose is to describe the financial aid options available to students through this office as well as provide important information about policies and procedures that may not be covered in the student catalog. In the case of conflicting information between this publication and the student catalog, the student catalog supersedes.

Although this handbook will answer most of your questions relating to financial aid, it is important that students are aware that Federal Regulations are subject to change which may impact policies and procedures stated in this publication. Students are encouraged to visit the Financial Aid Office for the most current information. General questions can usually be answered on a walk-in basis, but more specific questions may require an appointment.

Mission Statement

The office of Financial Aid is committed to providing financial assistance through grants, loans, and assistance in securing third party financing and scholarships when available, to enrolled students who meet the eligibility requirements; and who demonstrate a need for financial assistance and a desire to further their education.

Admissions Policies

Fair Application Policy

Admissions personnel are required to fairly and consistently apply admission standards to all Applicants. All acceptance or rejection of admission must be based on the admissions standards set forth in the acceptance policy.

Full disclosure Policy

Prior to admission, each applicant shall be fully informed as to the nature of training provided. Admissions personnel are required to provide each applicant with a copy of the catalog prior to signing an enrollment agreement.

Equal Opportunities Policy

Applicants will not be denied admission based on race, creed, color, sex, age, national origin, or disability as applicable to state and federal laws. The Salon Professional Academy will not admit a student who has a disability that may prevent them from being successful in the program or obtaining licensure in their field.

ADMISSIONS REQUIREMENTS

The College of Wilmington has an open application policy allowing applicants to apply at any time. The first step in the process is for applicants to complete a personal interview with an Admissions Representative. During this interview, the Admissions Representative will evaluate the individual's reasons for seeking training and assess their background and experience along with their desire and ability to make such a commitment. The College of Wilmington will attempt to educate applicants about the local job market, demand for their chosen profession, skills and knowledge required to work in these occupations and about the College of Wilmington's programs and services.

Students enrolling in any of our programs must be beyond the compulsory age of attendance (16 years of age in North Carolina) and possess a high school diploma or general equivalency diploma.

The following are required for admission to all programs of College of Wilmington:

- 1) Enrollment application
- 2) Proof of age (ID and/or Birth Certificate, passport, Gov. issued ID, driver's license)
- 3) Social Security Card or proof of eligible non-citizenship status
- 4) Proof of graduation (Diploma, Official High School Transcript showing graduation date, or GED certificate)
- 5) Required enrollment fee

To provide a safe environment, the school may conduct background checks on students. The admission of students with felonies is at the discretion of the President.

POLICY ON EVALUATING THE VALIDITY OF HIGH SCHOOL DIPLOMAS

Regulation 34 CFR 668.16 (p) requires Title IV schools to establish policies and procedures to confirm the authenticity of high school diplomas in the event that the school or the Secretary of the U.S. Department of Education has reason to question the validity of a student's high school diploma.

The School may require further documentation in the form of a certified copy of final high school transcripts for the high school in question or information from a company that evaluates foreign diplomas (in the case of a foreign diploma). Student self-certification is not considered sufficient proof of validity.

In addition to checking online for further information about the school issuing the diploma and its accreditation, the school may also contact the Department of Education in the state in which the diploma was issued to determine if the school listed on the diploma is on the state list of recognized schools.

The school maintains a list of known diploma mills for the admissions staff to check when receiving a diploma from an unknown and questionable source. It is understood that this list may not be all inclusive as there are hundreds of diploma mills some known and some not currently known. It is also understood that the list of schools in the FAFSA drop down box online also may not be all inclusive.

The school makes every reasonable effort to verify the validity of questionable high school diplomas.

Financial Aid Policy

College of Wilmington seeks to provide assistance to students enrolled in eligible programs who demonstrate financial need and have a desire to attend college. The types of institutional aid available include Federal grants and Federal student loans. All students are encouraged to apply at least six to eight weeks in advance of the term they plan to enter.

Financial need is determined by a standard needs analysis system using confidential data submitted by the parents and/or the student. The needs analysis establishes the financial need by deducting the computed family and/or the student contribution from the total cost of attending College of Wilmington. The Free Application for Federal Student Aid (FAFSA) is the needs analysis system used by College of Wilmington. It is used to determine eligibility for Federal Pell Grants, Federal Supplemental Educational Opportunity Grants, Federal Direct Student Loans, and Federal Work Study.

In order for students to be eligible for Federal Student Aid, they must have either a high school diploma or a recognized equivalent (such as a General Educational Development (GED) certificate) or have been home schooled.

Students receiving Federal Financial Assistance are required to meet the College's standards of academic progress. Additional Federal requirements restrict the time frame that students receiving aid have to complete their program and require completion of a minimum number of clock hours each payment period. Failure to do so may result in termination of financial aid eligibility. Detailed information on the financial aid standards will be issued to all students receiving financial aid.

All awards of need-based financial aid are made annually, and students must reapply each year by completing a new or renewal FAFSA in order to be considered for assistance.

Applying for Financial Aid

FAFSA

How do I apply?

What information do I need to complete a FAFSA?

- Your Social Security number and your parents' Social Security numbers, if you're a dependent student.
- Your driver's license number (if any).
- Your previous year's W-2 forms and other records of money earned (by you and by your parents, if you're a dependent student).
- Your previous year's Federal Income Tax Return (and that of your spouse, if you're married).
- Your parents' previous year's Federal Income Tax Return (if you're a dependent student).
- Any foreign tax return or tax return from Puerto Rico.

- Your previous year’s untaxed income records—examples include IRA deductions, child support, and veteran’s non educational benefits.
- Your current bank statements, business and investment mortgage information; business and farm records; and stock, bond and other investment records.
- Your alien registration number (if you are not a U.S. citizen).

**If possible, have the necessary previous year’s income tax returns finished so you can complete the FAFSA more easily and accurately. If you apply before your tax return has been completed, You will have the following two-step application process.

- Step 1—Apply and estimate your income and tax information on your application.
- Step 2—Make corrections later if your estimated income or tax information was not accurate. You cannot receive federal student aid unless all of your information is complete and accurate.

What is an FSA ID and what is it used for?

Your FSA ID is a user name and password that serves as your personal identifier.

Your FSA ID allows you to:

- “Sign” your FAFSA electronically and complete the student aid process completely online—no paper is involved. If you’re a dependent student and one of your parents has a Federal Student Aid ID, he or she can sign your FAFSA electronically online as well.
- Correct your FAFSA online.
- Access your *Student Aid Report (SAR)*.
- “Sign” a master promissory note for a federal student loan.
- Access your federal student aid records online, including your student loan history information on NSLDS.

How and when should I get a FSA ID?

You and your parents, if you’re a dependent student, can apply for an FSA ID anytime by visiting <https://fsaid.ed.gov/npas/index.htm>

What if I have questions about the FSA ID? You can contact...

- By e-mail at StudentAid@ed.gov (for general inquiries that do not include personally identifiable information)
- By phone at 1-800-557-7394
- By TTY for the hearing impaired at 1-800-730-8913
- By web chat. From fafsa.gov click “[Help](#),” then “Contact Us” and then the LIVE HELP button to initiate a chat.

Process for new applicants:

Apply between July 1, 2020 and June 30, 2021. To determine your eligibility for federal student aid, you need to complete the FAFSA. You may also need to complete an additional application in order to be considered for financial aid from your state or the school you’re interested in attending.

Apply online: Complete the FAFSA online at www.fafsa.ed.gov. Applying online is the fastest and easiest way to apply. Use the *FAFSA on the Web Worksheet* to write down

your information prior to completing the online form. You can print a copy of the *FAFSA on the Web Worksheet* at www.fafsa.ed.gov.

We encourage all students to apply early in order to ensure you receive your disbursements within a reasonable time. To ensure we are able to properly process your FAFSA, make sure your completed FAFSA includes College of Wilmington's School Code: 013850. This code will be used by the federal processor to ensure we receive your FAFSA results, which will determine your federal aid eligibility. To ensure accuracy, whenever possible, use income and other information from your completed tax return, rather than estimated figures. Once your FAFSA results are received by College of Wilmington, you will be awarded financial aid, according to your eligibility.

Student Aid Report (SAR) and Institutional Student Information Report (ISIR) Processing:

In order to receive financial aid, the student must complete a FAFSA (Free Application for Federal Student Aid), which is then forwarded to the institutions chosen on the application. When College of Wilmington receives the FAFSA, forwards the application electronically to the processing center, which is known as CPS. After processing is complete, College of Wilmington receives an ISIR, which allows us to determine the Expected Family Contribution (EFC), the Cost of Attendance (COA) and any other estimated financial assistance that the student is expected to receive. The Financial Aid Administrator will then complete the information on the loan period, grade level, and amount of loans requested. The College of Wilmington will calculate the maximum loan amount and prepare an award letter for the student.

Financial Need and Expected Family Contribution (EFC):

Aid for most of the Department of Education's programs is awarded based on financial need (except for **unsubsidized Stafford Loans, PLUS Loans and TEACH Grants**). The EFC is a measure of your family's financial strength and resources that should be available to help pay for your education. The EFC is calculated from the information you report on the FAFSA and according to a formula established by law. Your family's income (taxable and untaxed) and assets are considered in determining your EFC. Your family size and the number of family members who will be attending a college or career school are also considered. Your EFC will appear on the *Student Aid Report (SAR)* you receive after you file your FAFSA. To determine your financial need for federal student aid programs (except for unsubsidized Stafford Loan), you school subtracts the Expected Family Contribution (EFC) from your cost of attendance. The school uses federal grants and other financial aid to meet your financial need. Because the EFC formula must be applied to each family's financial information, we cannot tell you here whether you will be eligible for federal student aid or estimate how much aid you might receive. If you'd like to get an estimate of your financial aid award use *FAFSA4caster* at www.fafsa4caster.ed.gov. The information you submit with *FAFSA4caster* can be used to populate some of your *FAFSA on the Web* when you're ready to apply for aid. But remember to find out exactly what you will be eligible to receive you must apply for financial aid. If you want to see how the EFC formula works, you can get detailed worksheets from our website at www.FederalStudentAid.ed.gov/pubs. Click on the year under the "EFC formula" or you can call the Federal Student Aid Information Center at 1-800-4-FED-AID (1-800-433-3243). After you receive your SAR, you will also receive an award letter from the school(s) listed on

your FAFSA that offers you admission. Contact the financial aid office at the school(s) that sent you an award letter if you have any questions about your student financial aid award.

Unusual Family Circumstances:

The EFC formula is basically the same for all applicants, but there is some flexibility. Your Financial Aid Administrator (FAA) can adjust the cost of attendance or the information used to calculate your EFC to take into account your unusual circumstances. These circumstances could include your family's unusual medical expenses, tuition expenses or unemployment. The FAA must have good reasons to use professional judgment to make adjustments because of unusual circumstances. You will have to provide documentation to support any adjustments. For example, for the 2015-16 award year, financial aid administrators may use a letter from the state unemployment agency or other evidence that a student is receiving unemployment benefits to document the loss of income from work. The FAA's decision as to whether to make changes is final and cannot be appealed to the Department of Education. The following are several additional examples of unusual circumstances that the FAAs may consider as factors in making adjustments in the expected family contribution calculation or to the cost of attendance.

These examples are:

- Medical expenses not covered by insurance
- Dependent care costs
- A student or family member who is a dislocated worker; and
- A change in housing status that results in homelessness

Verification Policy:

Verification is a process required by the federal government in which the Financial Aid Office compares information on financial aid documents to source documents which are provided by the student. This process allows the Financial Aid Administrator to compare the documents for accuracy and confirm students' eligibility to receive financial aid.

Only students who are selected for verification must complete this step in the financial aid process.

Please do not provide this information unless the Financial Aid Office requests it. Not all students selected for verification will have to provide the same information; it may vary depending on what information needs to be confirmed. If a student is selected for verification, funds will not be disbursed until the process is complete.

The selection of which students will need to complete verification is random, and cannot be over-ruled by College of Wilmington or the Financial Aid Office. In some circumstances, the Financial Aid Office may select a student for verification to resolve any confusing or conflicting information. If a student is selected for verification, the Financial Aid Office will notify the student via mail/phone. The Financial Aid Administrator will explain what information will need to be verified and the supporting documentation that will be needed to verify this information. If the student is a dependent, this information may be required from either or both the student and the parent(s). Once notified that

verification will be required, the student will have 30 days to provide the supporting documentation. Failure to provide this information in a timely manner may cause a delay in disbursements or possibly a loss of disbursement. If a student drops or is terminated from College of Wilmington before the verification process is complete, the student will have 60 days from the drop date to complete the verification process. Below are some examples of supporting documentation that may be required for the student to provide for the verification process. This list is not all inclusive.

- Proof of citizenship
- Copies of income tax returns and accompanying schedules
- Documentation of independent status
- Veterans status
- Selective Service registration—Males born after July 1960 must register with Selective Services in order to be eligible for financial aid.
- Social security number verification—If your name has changed and you have not yet notified the Social Security Administration, aid cannot be disbursed until you have done so.
- Students who have been convicted of a drug offense may be ineligible for financial aid.

For more information, please contact the federal government at (800) 433-3243.

Professional Judgement

The College of Wilmington utilizes professional judgement at a minimal level. Only students whose personal and financial background can be considered unusual and unique, in circumstances which are not addressed by federal regulations, will be considered. This will be done on a case-by-case basis. This judgement is a discretionary option based on the experience and knowledge of the Financial Aid Administration, and is only used to address unique or unusual circumstances that affect that student's eligibility.

Professional judgement can be exercised in several areas, but it is always on a case-by-case basis in the Financial Aid Director's professional opinion. Areas which may be considered are as follows:

Information used to calculate EFC, which may include:

- Medical or dental expenses which are unusual and not covered by insurance
- Support of an extended family member(s)
- Expenses for elementary and secondary education tuition and dependent care
- Unusual Debt
- Income Reduction
- Dependency Status

Conflicting Data

The student will be informed by the Financial Aid Administrator that there are inconsistencies in the information. Conflicting data is any information that is made available to College of Wilmington that is different from information that was previously obtained, and could possibly have an impact on a student's eligibility for financial aid. This information includes, but is not limited to the verification process. Any information within the Financial Aid Office that appears to be inaccurate will be reviewed and corrected, if needed. This information can include (but is not limited to): citizenship

status, social security number, default or overpayment status, inconsistencies in information used in the Expected Family Contribution (EFC) calculation, etc. It is important to correct any inconsistencies or inaccuracies in order to ensure that each student is eligible to receive the correct amount of aid.

Resolving these conflicts can be at times be as simple as verifying that the earlier determination was correct, but at all times documentation of the resolution is required. All conflicting data must be resolved as soon as possible. Financial aid cannot be disbursed until all conflicting information is corrected.

Students must have their financial aid package completed before registration. Applicants who do not complete financial aid documents prior to registration must come prepared to meet all their expenses out of pocket. The Financial Aid Office reserves the right to adjust a financial aid package when an over-award occurs. The financial aid package includes, but is not limited to FAFSA on the Web, Entrance Counseling, and Promissory Note. These forms are available on the Web.

Students must notify the Financial Aid Office if any additional gift aid assistance is received for educational expenses. Furthermore, the Financial Aid Office reserves the right to void any awarded aid if it is determined that the student intentionally provided incorrect or false information on the FAFSA. All financial aid awards are subject to change if the information on which they were based changes. Federal Regulations require that awards be changed if they were given on incorrect or false information.

College of Wilmington's Financial Aid Office will adjust students' awards throughout add/drop periods, or as deemed necessary. An award letter is issued based on full-time, half time and or three-quarter time for the entire year.

Full-time status consists of enrollment in a minimum of 24 clock hours. Three-quarter time status consists of enrollment in 18 clock hours. Half-time status consists of enrollment in 12 clock hours. Students must report any change in enrollment status to the Financial Aid Office.

Processing Applications

Applications for Financial Aid are processed by the Department of Education Central Processing System. If the school code for College of Wilmington is included on the application, a refined copy of the application, along with other pertinent processing information is forwarded to the college electronically in an Institutional Student Information Report (ISIR). If the application is complete and does not require verification, it is then packaged for processing and disbursement of funds. If further documentation is required, or the student is selected for verification, a request by letter, electronically, or in person is sent to the student for additional documentation. Students are given a time-frame to return the information.

Students who are eligible to receive a loan will not be disbursed any loan proceeds until after completion of thirty (30) days in attendance.

An award letter containing the student's financial aid is prepared prior to disbursement of any

funds.

NOTE: Upon receipt of Federal Student Aid funds by the Business and Finance Office, (i.e., Pell, loans,) the student's account will be credited prior to any refunds. Once the student's account is credited and there is a balance due the student, a credit balance is calculated and a refund (credit balance) is issued to the student within 14 days unless there is authorization signed by the student allowing the college to keep these funds for future charges. No funds are disbursed from the Financial Aid Office. All disbursements are made by the Business and Finance Office.

Types of Aid Available

Grants

Federal Pell Grant

Pell Grants are the foundation of federal student financial aid, to which aid from other federal and nonfederal sources may be added. Pell Grants are generally awarded only to undergraduate students—those who haven't earned a bachelor's or graduate degree. Grants are aid that you do not have to repay and are usually based on financial need. By completing the FAFSA, you will automatically be considered for the Federal Pell Grant. This grant is awarded to undergraduate students with the lowest Expected Family Contribution (EFC). The award amount may change annually and varies depending on enrollment status (full-time/part-time).

- The maximum award for the 2020-21 award year will be \$6,345.00
- You must be enrolled at least half time and in a program that leads to an associate or bachelor's degree or certificate.
- The maximum award grant is given for any Pell Grant eligible student whose parent or guardian was a member of the U.S. Armed Forces and died as a result of service performed in Iraq or Afghanistan after September 11, 2001. You must be under 24 years old or enrolled at least part-time in college at the time of your parent's death. Effective July 1, 2010, if you are not eligible for a Pell Grant but your parent or guardian met the same post-September 11, 2001 conditions above, you will be eligible to receive an Iraq and Afghanistan Service Grant equal to the amount of maximum Pell Grant for the award year, except that the amount will not exceed the cost of attendance for that award year.
- If you're eligible for a Pell Grant you'll receive the full amount you qualify for—each school participating in the program receives enough funds each year from the U.S. Department of Education to pay the Pell Grant amounts for all its eligible students.
- The amount of other student aid you might qualify for does not affect the amount of your Pell Grant.
- You can receive Pell Grants only up to 6 years, or the equivalent of 600%.

If a student withdraws while receiving a Pell grant, the award amount may be adjusted. You can learn more about the Federal Pell Grant by scheduling a meeting with the Financial Aid Administrator or visiting the federal website at: <http://www2.ed.gov/programs/fpg/index.html>.

Loans

Unlike grants and scholarships, loans are a type of financial assistance that must be repaid. Loans come with interest that must also be repaid, so it is important to research and weigh your options carefully before borrowing, and borrow conservatively. Federal loans usually have lower interest rates and better benefits than private loans. We strongly encourage students to maximize federal loan eligibility before considering private loan options. By completing the FAFSA, you will automatically be considered for federal loan programs available at College of Wilmington. More information on the federal loan programs available at College of Wilmington can be found below.

Federal Direct Loan Program

The William D. Ford Federal Direct Loan is a fixed interest loan. Students cannot borrow more than the estimated cost of attendance, meaning the loan cannot exceed the standard budget for the institution. In addition to these need and budget limitations, a federal maximum also applies. To be eligible for a Federal Direct Loan, a student must be enrolled at least half time and meet institutional satisfactory progress standards. In addition, a student must complete the financial aid process in order to be eligible. There are two types of Federal Direct Loans: subsidized and unsubsidized. See table below for interest rate information for both Federal Direct Loans and Direct Plus Loans.

Interest Rates for Direct Loans First Disbursed on or After July 1, 2020		
Loan Type	Borrower Type	Loans first disbursed on or after 7/1/20 and before 7/1/21
Direct Subsidized Loans	Undergraduate	2.75%
Direct Unsubsidized Loans	Undergraduate	2.75%
Direct Unsubsidized Loans	Graduate or Professional	4.30%
Direct PLUS Loans	Parents and Graduate or Professional Students	5.30%

Obtaining a Federal Direct Loan:

Upon completion of the FAFSA and any other paperwork that may be required, the financial aid office will inform the student of the award amount available. A student can request to take a portion or all of the amount awarded, but is not able to request more than what was awarded. The student will also be informed of any additional steps that must be completed prior to obtaining any disbursements. If a student needs assistance completing any of these steps, the student can schedule an appointment with the Financial Aid Administrator who will assist the student.

See table below with origination fees for both Federal Direct Loans and Direct PLUS Loans

Loan Type	First Disbursement Date	Loan Fee
Direct Subsidized Loans and Direct Unsubsidized Loans	On or after 10/1/19 and before 10/1/20	1.059%
	On or after 10/1/20 and before 10/1/21	1.057%
Direct PLUS Loans	On or after 10/1/19 and before 10/1/20	4.236%
	On or after 10/1/20 and before 10/1/21	4.228%

Subsidized Loans

Subsidized loans are available to students who demonstrate financial need after applying all grants, scholarships and other applicable resources. If a student’s financial need is met through grants, scholarships and other applicable resources, the student will not receive a subsidized loan. No interest will accrue on a subsidized loan while the student is in school or for the first six months after they leave school. Recipients of these loans may also apply for periods of deferment after leaving school if low income or hardships prevent repayment.

Unsubsidized Loans

Unsubsidized loans are also available through the Federal Direct Loan program. These loans are non-need based. Unlike the subsidized loans, the student is responsible for interest that accrues while the student is attending school. Students have the option of paying the interest while in school or letting it capitalize until they begin making payments on the principal. Choosing to let it capitalize will increase the total amount that must be repaid.

Loan Reporting Requirements

Subsidized and Unsubsidized Federal Loan information will be submitted to the National Student Loan Database System. This system is accessible by guaranty agencies, lenders, borrowers and institutions determined to be authorized users of the data system.

Federal Direct Parent Plus Loan:

The Federal Direct Parent Plus Loan for Undergraduate Students, often called PLUS, is non-need based. It is a fixed interest rate loan for the parents of dependent students. Amounts of the loan are limited by the institutional budget less other financial aid the student has received. The repayment on the loan begins 60 days after the loan is fully disbursed. The loan cannot be transferred into the student's name; the parent borrower must repay the loan. In order for a parent to be eligible for a PLUS loan, their dependent student must maintain at least half-time enrollment and is required to meet Satisfactory Academic Progress.

Obtaining a PLUS Loan

After completing the FAFSA, if a parent wants to take out a PLUS loan, the parent must apply. Either the student or the parent can apply by contacting the Financial Aid Administrator and obtaining a Parent Plus Authorization for Credit Check Form. Once approved for the PLUS loan, the parent will be required to complete their own Master Promissory Note (separate from the one completed by the student). This must be completed in advance and can be completed through the Master Promissory Note link on the Direct Loan website at: www.studentloans.gov. It is recommended to turn off all popup blockers to enable successful completion of the Master Promissory Note. In order to complete the Master Promissory Note, the parent will need their FSA ID, driver's license (or state ID) number, and the names and addresses of two personal references from two different households. Parents are not required to complete Entrance or Exit Counseling when taking PLUS loans. After deducting any funds necessary for tuition or fees owed to the institution, PLUS loans are disbursed directly to the parent.

Repayment

The Federal Direct PLUS loan will enter repayment 60 days after the final disbursement. All repayment and deferment questions can be answered by the Direct Loan Servicing Center at (800) 848-0979.

Loan Reporting Requirements

PLUS Loan information will be submitted to the National Student Loan Database System. This system is accessible by guaranty agencies, lenders, borrowers and institutions determined to be authorized users of the data system.

Veterans Benefits

Veterans or children of Veterans may be eligible for educational benefits based on U.S. military service. You can find more information, or apply for these benefits at: <http://www.va.gov/> or by calling (800) 827-1000. A variety of financial support sources are available for military veterans, spouses, and dependents of veterans who honorably served in our Nation's armed forces. The amount of benefits awarded is determined by the Department of Veterans Affairs and is based on the number of credit hours for which a student is enrolled.

Chapter 30: Montgomery G.I. Bill – Active Duty/Discharged

Chapter 31: Vocational Rehabilitation

Chapter 33: Post 9/11 G.I. Bill

Chapter 35: Dependents Education Assistance

Chapter 30

Veterans who wish to use their VA educational benefits for the first time should apply online at <http://www.gibill.va.gov> and complete a form 22-1990, Application for Educational Benefits, to receive a Certificate of Eligibility.

If educational benefits have previously been used, complete a form 22-1995, Change of Program, online at <http://www.gibill.va.gov> to receive a Certificate of Eligibility.

Submit the following documents to the Office of Student Financial Services:

- Certificate of Eligibility
- Certificate of Release of Discharge from Active Duty (DD-214)
- Official academic transcripts from previously attended colleges and/or universities
- VA Information Sheet
- VA Degree Plan

Chapter 31

Qualifying disabled veterans receiving Veterans Affairs Benefits must contact the VA – R&E Department at 713.383.1999 to obtain authorization and certification (VA form 28-1905) prior to registration for class(es).

Chapter 33

Veterans who wish to use their VA educational benefits for the first time should apply online at <http://www.gibill.va.gov> and complete a form 22-1990, Application for Educational Benefits, to receive a Certificate of Eligibility.

If educational benefits have previously been used, complete a form 22-1995, Change of Program, online at <http://www.gibill.va.gov> to receive a Certificate of Eligibility

Submit the following documents to the Office of Student Financial Services:

- Certificate of Eligibility
- Certificate of Release of Discharge from Active Duty (DD-214)
- Official academic transcripts from previously attended colleges and/or universities
- VA Information Sheet
- VA Degree Plan

Chapter 35

Qualified dependents who wish to use their VA educational benefits for the first time should apply online at <http://www.gibill.va.gov> and complete a form 22-5490, Application for Survivors' and Dependents' Educational Assistance, to receive a Certificate/Letter of Eligibility.

If educational benefits have previously been used, complete a form 22-1995, Change of Program, online at <http://www.gibill.va.gov> to receive a Certificate of Eligibility

Submit the following documents to the Office of Student Financial Services:

- Certificate of Eligibility
- Certificate of Release of Discharge from Active Duty (DD-214)
- Official academic transcripts from previously attended colleges and/or universities
- VA Information Sheet
- VA Degree Plan

Native American Tribe Benefits

Many Native American tribes offer education benefits to members of their tribe. The benefits often vary by tribe and each tribe has separate requirements for eligibility. If you are a member of a Native American tribe, contact the Higher Education Department of your tribe to obtain more information on the requirements and the benefits available.

Dislocated Worker

Displaced or dislocated workers may be eligible for educational benefits through the North Carolina Department of Workforce Development. Benefits and eligibility vary depending on individual circumstances. You can find more information on eligibility and benefits by visiting your local North Carolina Job Center.

Foster Care System

Students who are in foster care, aged out of foster care or were adopted out of foster care after reaching age 13 are considered automatically independent on the Free Application for Federal Student Aid (FAFSA)

Scholarships

There are a variety of scholarships available to assist students with educational need. Information on most scholarships are available online, and students are encouraged to search for applicable scholarships.

Entrance Loan Counseling

In addition to meeting with the Financial Aid Administrator, the student must also complete the required entrance loan counseling prior to receiving any disbursements. This is a one-time requirement and must be completed in advance by using the Federal Direct Loan Entrance Counseling link on the Direct Loan website at: www.studentloans.gov. The student is required to complete the quiz using their name, social security number and date of birth. Students are also required to complete an Entrance Loan Counseling form, which the student and Financial Aid Administrator must sign to verify that this counseling has been completed. Once the student has completed the quiz, the results will be electronically available to the Financial Aid Administrator, who will then sign the form and place it in the student's file. It is required that all Direct Loan Borrowers complete entrance loan counseling, even if the borrower has had loan counseling at another institution.

Entrance Counseling covers the following topics:

Student rights to the following:

- Written information on loan obligations and information on rights and responsibilities as a borrower.
- A grace period and an explanation of what this means.
- A disclosure statement, received before the student begins to repay their loan, that includes information about interest rates, fees, the balance owed, and the number of payments.

- Deferment of repayment or forbearance for certain defined periods, if student qualifies and if students requests deferment or forbearance.
- Repayment plan types
- Prepayment of student loan in whole or in part anytime without an early repayment penalty.
- A copy of student's MPN either before or at the time the student's loan is disbursed.
- Documentation that the student's loan has been paid in full.

Student responsibilities for the following:

- Completing exit counseling before the student leaves school or drops below halftime enrollment.
- Repaying the loan even if the student does not complete the academic program, student is dissatisfied with the education received, or student is unable to find employment after graduation.
- Notifying the school and the Direct Loan Servicing Center if the student:
 - Moves or changes his/her address, telephone number, or email address
 - Changes his/her name
 - Withdraws from school or drops below half-time enrollment
 - Transfers to another school
 - Fails to enroll or reenroll in school for the period in which the loan was intended
 - Changes his/her expected graduation date
 - Graduates
- Making monthly payments on the loan after the grace period ends, unless there is a deferment or forbearance and repayment options will be provided during exit counseling.
- Notifying the Direct Loan Servicing Center of anything that might alter eligibility for an existing deferment or forbearance.

Master Promissory Note

In addition to meeting with the Financial Aid Administrator and completing Entrance Loan Counseling, the student must also complete a Master Promissory Note prior to receiving any disbursements. This must be completed in advance and can be completed through the Master Promissory Note link on the Direct Loan website at: www.studentloans.gov. It is recommended to turn off all pop-up blockers to enable successful completion of the Master Promissory Note. In order to complete the Master Promissory Note, the student will need their FSA ID, driver's license (or state ID) number, and the names and addresses of two personal references from two different households. Students are asked to read the Borrowers Rights and Responsibilities Statement provided by the Federal Direct Loan Program. This statement details the terms of the student's loan. Students are able to obtain this statement at: <http://www2.ed.gov/offices/OSFAP/DirectLoan/dlrights.pdf>.

Upon completion of all of these steps, the student will receive a "Disclosure Statement" from the Direct Loan Servicing Center. This statement will list the disbursements to be made to the student. It is important that the student keep this for their records. The Master Promissory Note is a binding legal contract that says you agree to repay your loan according to the terms of the promissory note. Read this note carefully before you sign it and save a copy for your records.

Exit Loan Counseling

If a student who was awarded a Direct Loan withdraws, drops below half-time enrollment, or graduates, the student must complete exit loan counseling. The exit counseling can be completed online through the Direct Loan website at: www.nsls.ed.gov. The exit counseling will provide the student important information regarding repaying their loan, deferment, loan cancellation and consequences that may occur due to student loan default. After completing this counseling, the student and the Financial Aid Administrator must sign the Exit Loan Counseling form to verify that it has been completed. This form will then be placed in the student's file. Please contact the Financial Aid Office if you have questions in regards to exit loan counseling.

Exit Counseling covers the following topics:

Student rights to the following:

- Written information on loan obligations and information on rights and responsibilities as a borrower.
- A grace period and an explanation of what this means.
- A disclosure statement, received before the student begins to repay their loan, that includes information about interest rates, fees, the balance owed, and the number of payments.
- Deferment of repayment or forbearance for certain defined periods, if student qualifies and if students requests deferment or forbearance.
- Prepayment of student loan in whole or in part anytime without an early repayment penalty.
- A copy of student's MPN either before or at the time the student's loan is disbursed.
- Documentation that the student's loan has been paid in full.

Student responsibilities for the following:

- Completing exit counseling before the student leaves school or drops below halftime enrollment.
- Repaying the loan even if the student does not complete the academic program, student is dissatisfied with the education received, or student is unable to find employment after graduation.
- Notifying the school and the Direct Loan Servicing Center if the student:
 - Moves or changes his/her address
 - Changes his/her phone number
 - Changes his/her name
 - Changes in employer or employer's address or telephone number
- Making monthly payments on the loan after the grace period ends, unless there is a deferment or forbearance and repayment options will be provided during exit counseling.
- Notifying the Direct Loan Servicing Center of anything that might alter eligibility for an existing deferment or forbearance.

Exit Counseling can be completed at the following website: www.NSLDS.ed.gov.

Education Requirements

You must demonstrate by one of the following means that you are qualified to enroll in postsecondary education:

- Have high school diploma or General Educational Development (GED) certificate.
- Meet other standards your state established and that the Department of Education has approved.
- Complete a high school education in a home school setting approved under state law.

You must be enrolled or accepted for enrollment as a regular student working toward a degree or certificate in an eligible program. You must meet satisfactory academic progress standards set by the postsecondary school you are or will be attending. You might be able to receive aid for distance education courses as long as they are part of a recognized certificate or degree program.

Intellectual Disabilities

Students with intellectual disabilities can receive federal student aid under the Federal Pell Grant Program, FSEOG Program and Federal Work-Study Program. To be eligible, you must:

- Be enrolled or accepted for enrollment in a comprehensive transition and postsecondary program for students with intellectual disabilities at an institution of higher education;
- Be maintaining satisfactory progress
- Meet other student eligibility criteria

A comprehensive transition and postsecondary program for students with intellectual disabilities means a degree, certificate, or non-degree program that

- Is offered by an institution of higher education
- Is designed to support students with intellectual disabilities who are seeking to continue academic, career and technical, and independent living instruction in order to prepare for gainful employment
- Includes an advising and curriculum structure
- Requires students with intellectual disabilities to participate on not less than a half-time basis with nondisabled students in (1) regular enrollment in credit-bearing courses, (2) auditing or participating in courses for which the student does not receive regular academic credit, (3) enrollment in noncredit-bearing, non-degree courses, or (4) participation in internships or work-based training.

Legal and Other Requirements

- You must be a U.S. citizen or eligible noncitizen.
- You must have a valid SSN, you can find out more about applying for one at www.ssa.gov or by calling 1-800-772-1213. (TTY users can call 1-800-325-0778.)
- When you apply for federal student aid you sign a statement that certifies that you will use federal student aid for educational purposes only. You also certify that you are not in default on a federal student loan and do not owe a refund on a federal student grant (which could happen if you withdraw from school, for example).
- You must comply with Selective Service registration. If you're a male aged 18 through

25 and you have not registered you can, at the same time you complete your GAGSA, give the Selective Service System permission to register you by means of the FAFSA. You can also register online at www.sss.gov or call 1-847-688-6888. (TTY users can call 1-847-688-2567.)

- Generally, if you have been convicted for the possession or sale of illegal drugs for an offense that occurred while you were receiving federal student aid, you will be ineligible for a period of time based on the type and number of convictions. If you answer “Yes” to this question, it is very important that you complete and submit the FAFSA to determine your eligibility. If you are submitting a paper FAFSA, you will be mailed a worksheet to assist you in determining whether your conviction affects your eligibility for federal student aid. If you are applying using *FAFSA on the Web* at www.fafsa.ed.gov, you will be provided the electronic version of the same worksheet during your online session. If you need assistance or have any questions on how to answer this question, call 1-800-4-FED-AID (1-800-433-3243) for help from the Federal Student Aid Information Center. Even if you’re ineligible for federal student aid because of a drug conviction, you should still complete the FAFSA because most schools and states use FAFSA information to award nonfederal aid. If you have lost federal student aid eligibility due to a drug conviction, you can regain eligibility if you pass two unannounced drug tests conducted by a drug rehabilitation program that complies with criteria established by the U.S. Department of Education.
- You have limited eligibility for federal student aid while you’re incarcerated. Generally, you’re only eligible for a Pell Grant and then only if you’re NOT incarcerated in a federal or state penal institution. Check with the financial aid office at the school you plan on attending.

Independent Student Definition

Independent students report their own income and assets (and those of a spouse, if married). For the 2020-21 academic year, you’re an independent student IF at least one of the following applies to you:

- You were born before January 1, 1997
- You’re married on the day you apply (even if you are separated, but not divorced)
- You are or will be enrolled in a master’s or doctoral degree program (beyond a bachelor’s degree) at the beginning of the 2020-21 academic year
- You are currently serving on active duty in the U.S. Armed Forces for purposes other than training
- You’re a veteran of the U.S. Armed Forces. (A “veteran” includes students who attended a U.S. service academy and were released under a condition other than dishonorable. For more details on who is considered a veteran, see the explanatory notes on the FAFSA.)
- You have children who will receive more than half their support from you between July 1, 2020 and June 30, 2021.
- You have legal dependents (other than your children or spouse) who live with you and who receive more than half of their support from you now through June 30, 2021.
- At any time since you turned age 13, both your parents were deceased, you were in foster care or you were a dependent or ward of the court.
- You are or were an emancipated minor as determined by a court in your state of legal

residence.

- You are or were in legal guardianship as determined by a court in your state of legal residence.
- At any time on or after July 1, 2020, the director of an emergency shelter or transitional housing program funded by the U.S. Department of Housing and Urban Development determined that you were an unaccompanied youth who was homeless.
- At any time on or after July 1, 2020, the director of a runaway or homeless youth basic center or transitional living program determined that you were an unaccompanied youth who was homeless or self-supporting and at risk of being homeless.

If none of these criteria apply to you, you're a dependent student.

Dependent Override Policy

Under unique circumstances, the Financial Aid Administrator has the ability to change students who would usually be considered dependent into an independent status using her professional judgment. These circumstances must be fully documented and a copy of the documentation must be placed in the student's file. Examples of unique circumstances which may lead to a professional judgment in dependency status include but are not limited to: a student who has been abandoned by his/her parents or a student who has had an abusive relationship with his/her family. In order to be considered for a dependency override, the student must schedule an appointment with the Financial Aid Administrator to explain the unique circumstance. The Financial Aid Administrator will then review the application and inform the student that (s) he must provide four documents supporting the request, including a document from the student explaining the circumstances that make the situation unique. Additional documents can include letters from counselors or other, death certificates, court orders, etc. depending on the individual's situation. The Financial Aid Administrator will then make a determination as to whether the dependency override will be granted to the student. If the override is not granted, students have the right to appeal the decision in a written letter to the President. The President then meet with the student and the Financial Aid Administrator and make a final decision about the override.

Fraud Policy

In some situations students and/or parents purposefully misrepresent information in order to obtain additional assistance. For this purpose, the Financial Aid Office has a policy that is strictly enforced when fraud or abuse is occurring or suspected of occurring. In cases where students and/or parents submit fraudulent information, the suspected fraud will be investigated to the furthest extent possible. In addition, all cases of fraud or suspected fraud will be reported to the proper authorities. If the Financial Aid Administrator suspects that there has been intentional misrepresentation, alteration of documents or false statements which may have resulted in the student receiving an award or disbursement of funds for which they weren't eligible, she will immediately contact the President to discuss the situation. The Financial Aid Administrator and the President will then notify the student and schedule an appointment to discuss the situation. If the student does not attend the scheduled appointment, the Financial Aid Administrator and the President will make a determination as to which of the following ways to handle the situation: refusal to process the financial aid application until the situation is resolved, determining that financial aid will not be awarded, cancelling financial aid, and/or determining financial aid will not be processed in future years. In all circumstances, fraudulent

situations will be forwarded to the Office of the Inspector General at the Department of Education, who can be contacted at (800) MIS-USED or (800) 647-8733.

Confirmation of Citizenship

In order to be eligible to receive aid from the Federal Student Aid programs a student must be a United States citizen or national, a United States permanent resident, a citizen of the Freely Associated States: the Federated States of Micronesia and the republics of Palau and the Marshall Islands (although Federal Student Aid is limited to only certain programs), or an eligible noncitizen. The basic requirements for eligible noncitizens is that the student is in the United States for a purpose that is more than temporary and the student also has the intention of becoming either a citizen or a lawful permanent resident. This must be documented by the United States Citizenship and Immigration Services (USCIS) in the Department of Homeland Security (DHS). (Note: The USCIS was at one point known as the Bureau of Citizenship and Immigration Services or BCIS, and prior to that was the Immigration and Naturalization Services or INS.)

United States Citizen or National

United States Citizens or Nationals who apply for student aid have their application automatically matched with Social Security records to verify name, date of birth, U.S. citizenship status, social security number and possible date of death. The results from this process are reported under the SSA of the match flags on the Institutional Student Information Record (ISIR) and the SSA Citizenship Code on the Student Aid Report (SAR). Even if the student does not fill in an answer for the citizenship question on the FAFSA, a match will still be attempted to be made with SSA. If there is a complete match with the SSA records, the student will be determined to be a citizen. If one or more items do not match, the application will be rejected and the school will be informed that Federal Student Aid cannot be processed until the information is corrected. A match will attempt to be made again, but if the information still does not match, the student can instead provide documentation of citizenship (see examples below). If it cannot be confirmed that a student is a citizen through the SSA match, the SAR and the ISIR will provide a comment explaining that the student needs to provide citizenship documentation or make a correction which confirms that the student is an eligible noncitizen.

Citizenship Documents

The Department of Education does not specify what documents are acceptable form of proof of citizenship, but The College of Wilmington will accept any of the documents listed below (this list is not all inclusive):

- Birth certificate (which states they were born in the United States, Puerto Rico (on or after 01/13/1941), Guam, the U.S. Virgin Islands (on or after 01/17/1917), American Samoa, Swain’s Island, or the Northern Mariana Island—unless the student was born to foreign diplomats residing in the United States)
- U.S. Passport, current or expired, except limited passports. In the case of nationals who are not citizens, the passport should be stamped “Noncitizen National”.
- A copy of the following State Department Documents
 - Form FS-240 (Consular Report of Birth Abroad)

- Form FS-545 (Certificate of birth issued by a foreign service post)
- DS- 1350 (Certification of Report of Birth)
- A Certificate of Citizenship (either N-560 or N-561), which is issued by USCIS to individuals who are U.S. citizens through a parent
- A Certificate of Naturalization (either N-550 or N-570), which is issued by the USCIS through a federal or state court or through administrative naturalization after December 1990 to those who are individually naturalized.

U.S. Permanent Residents and Other Eligible Noncitizens

A noncitizen resident who is legally permitted to live and work in the United States permanently is called a lawful permanent resident (LPR). In addition to LPRs there are eligible noncitizens, including:

Refugees: Although this status is considered temporary, refugees can apply for permanent residence.

Persons granted asylum: These persons have been given employment authorization for one year, and at the end of that year they are eligible to apply for permanent residence.

Until permanent residence status is granted or unless asylum status is revoked, these persons remain in asylum status.

Conditional entrants: This category was no longer used after March 31, 1980, but applies to persons who entered the United States under the seventh preference category of P.L. 89-236 or whose status was adjusted under that category to lawful permanent resident alien.

Persons paroled into the United States (for at least one year): These persons must provide evidence (i.e. filing a valid permanent resident application) that they intend to become a citizen or a permanent resident and are in the United States for purposes which are more than temporary.

Cuban-Haitian entrants

Confirmation of Immigration Status

The Department of Education collects A-Numbers (which are assigned to all legal immigrants) on the FAFSA, which allows for them to verify immigration status. The applicant must indicate on the FAFSA that (s)he is an eligible noncitizen and provide the A-number. This information is automatically sent to the DHS for Primary Verification. The results are shown under the “DHS” section of the ISIR and the SAR, and also a comment on the results on the output document. In addition, this information will also be matched with SSA citizenship information, although DHS results take precedence over SSA results.

Student File Documentation

All documentation that could impact any aspect of the students or their education is maintained in the student files. Students at The College of Wilmington have a paper and an electronic file. Paper files are maintained in the Financial Aid Office, and electronic files are maintained by all departments within the administration. Retention requirements for these records can be found in the Record Retention and Destruction Policy (which is excerpted below): All student records and documentation which provide information regarding the standards of admissions have been met for a student, or any documentation providing for a basis of denial of admission to any prospect, will be maintained in

accordance with regulatory standards for a minimum of seven years. These records will be maintained in a fire proof file cabinet in the financial aid office during the time the student is enrolled. **This policy will allow for the exception that in ALL circumstances, student transcripts will be maintained electronically indefinitely.** The files will be maintained for a minimum of seven years, after which point the electronic file may be deleted from the system and the paper file can be shredded.

Transfer Monitoring Process

The national database of information about loans and grants which have been awarded to students is compiled on the National Student Loan Data System (NSLDS). This database is a composition of Title IV loans and grants throughout their life cycle, beginning with the approval for the aid and then through disbursement, repayment, delinquency and closure. Student transfers are monitored through the NSLDS database as well. Once a student is posted on the monitoring list, The College of Wilmington must wait seven days to disburse the funds to the student. During this process, no action is required by the student, but the student cannot receive any federal student aid until the process is complete. If a student received financial aid from another school at any time during the same year the student is or is planning to attend College of Wilmington, the student must cancel any pending aid disbursements from their previous school in order to ensure the student will receive the correct award from our school.

Transfer Policies

Transfer of Credit Policy

A transfer student may be accepted after careful evaluation of the student's academic records. Each transfer's program must be evaluated on an individual basis. No more than 50% of the program can be credited from another institution.

Transfers to another School

Every institution has its own policy regarding transferring credits. The College of Wilmington cannot guarantee the transferability of any particular courses.

Family Educational Rights and Privacy Act of 1974 (FERPA) Policy

The FERPA is a federal law designed to protect the privacy of a student's education records. The law applies to all schools which receive funds under an applicable program from the U.S Department of Education. The FERPA gives certain rights to parents regarding their children's education records. These rights transfer to the student or former student who has reached the age of 18 or is attending any school beyond the high school level. Students and former students to whom the rights have transferred are called eligible students.

****Parents or eligible students have the right to request that a school current records believed to be inaccurate or misleading. If the school refuses to change the records, the parent or eligible student then has the right to a formal hearing. After the hearing, if the school still refuses to make the corrections,**

the parent or eligible student has the right to place a statement in the records commenting on the contested information in the records.

****Generally, the school must have written permission from the parent or eligible student before releasing any information from a student's record. However, the law allows schools to disclose records without any consent to the following parties:**

- School employees who have a need-to-know
- Other schools to which a student is transferring
- Parents when a student over 18 is still dependent
- Certain government officials in order to carry out lawful functions
- Appropriate parties in connection with financial aid to a student
- Organizations doing certain studies for the school
- Accrediting organizations
- Individuals who have obtained court orders or subpoenas
- Persons who need to know in cases of health and safety emergencies
- State and local authorities to whom disclosure is required by state adopted laws before November 19, 1974

Schools may also disclose, without consent, "directory" type information such as student's name, address, telephone number, date and place of birth, honors and awards, and dates of attendance. However, the school must tell parents and students of the information that is designated as directory information and provide a reasonable amount of time to allow the parent or eligible student to request the school not to disclose that information about them. Schools must notify parents and eligible students of their rights under this law. The actual means of notification is left to each school. If you wish to see your records, you should contact the school for the procedure to follow. Any questions or concerns under this act should be directed to: Family Policy Compliance Office, Department of Education, 400 Maryland Ave SW, Room 3017, Washington D.C. 20202-4605 or you may call (202) 401-2057.

Default Management

Default Management is required by the Department of Education for institutions who participate in the Direct Loan program. This is used as a tool to promote student success, and in an effort to reduce student loan defaults in this program. There are nine activities which make this successful, which are: Entrance Counseling, Financial Literacy for Borrowers, Communication Across Campus, Exit Counseling, Timely and Accurate Enrollment Reporting, NSLDS Date Entered Repayment (DER) Report, Late State Delinquency Assistance (LSDA), Loan Record Detail Report (LRDR) Data Review and Analyzing Defaulted Loan Data to Identify Defaulter Characteristics. The College of Wilmington has adopted a Default Management Plan that includes an in-house Default Manager as well as a third party company, Pantheon, in order to successfully follow this plan and in an effort to reduce student loan default rates in the Direct Loan program.

Refund Policy

Any student who [or in the case of a student under legal age, his/her parent or guardian] cancels the enrollment contract and requests a refund in writing within three [3] business days of the signing of an

enrollment contract, but prior to starting classes, shall receive a refund of all money paid to the School [except for the non-refundable: application fee, enrollment fee, textbooks, and kit/supplies]. The postmark on the written notification shall determine the cancellation date, or the date said information is delivered in person to the School President.

For students who enroll and begin classes, the following schedule of tuition and fees refund is applicable:

Cosmetology Program

Percentage of Enrollment Time To Total Time of Course	Amount of Total Tuition Owed to the School
Drop Add Period (0.01-75 hours)	0%
75.01-300 hours	20%
300.01 - 450 hours	45%
450.01 - 750 hours	70%
50% of Course or Over (Greater than 750 hrs.)	100%

Cosmetology Instructor

Percentage of Enrollment Time To Total Time of Course	Amount of Total Tuition Owed to the School
Drop Add Period (1 - 10 hours)	0%
40.01 - 150 hours	20%
150.01 - 300 hours	45%
300.01 - 400 hours	70%
50% of Course or Over (Greater than 400 hrs.)	100%

Therapeutic Massage Program

Percentage of Enrollment Time To Total Time of Course	Amount of Total Tuition Owed to the School
--	---

Drop Add Period (1 - 37 hours)	0%
37.01 - 150 hours	20%
150.01 - 275 hours	45%
275.01 - 370 hours	70%
50% of Course or Over (Greater than 370 hrs.)	100%

Medical Office Administration

Percentage of Enrollment Time To Total Time of Course	Amount of Total Tuition Owed to the School
Drop Add Period (1 – 36.50 hours)	0%
36.51.01 - 120 hours	20%
120.01 - 182 hours	25%
Through Second 25% of Course (25% to 49.9%); (Greater than 182.01 hrs. thru 365 hrs.)	70%
50% of Course or Over (Greater than 365 hrs. or more)	100%

***** please refer to enrollment agreement for your refund policy*****

Enrollment time is defined as the time elapsed between the actual starting date and the date of the student’s last day of physical attendance in the school.

Any money to be refunded will be credited to the student’s account and/or paid within forty-five [45] days from the formal cancellation by the student or formal termination by the School, which shall occur no more than forty-five [45] days from the last day of physical attendance, or in the case of a leave of absence, the documented date of expected return. All payments due to be paid by the School as a result of this refund policy shall be credited to the student’s account and/or paid in the following order:

1. Title IV Loan Programs
2. Federal Pell Grant Program
3. Private Scholarships
4. Institutional Scholarships
5. To the Student

Non-refundable items are not included in tuition refund adjustment computations.

If a program is cancelled subsequent to enrollment of the student, the School shall, at its option:

1. Provide a full refund of money paid
2. Provide completion of the program

Withdrawals

A withdrawal is when a student ceases to attend classes at the institution without obtaining an authorized Leave of Absence (LOA).

A student is required to provide notification to the institution of intent to withdraw by completing an official withdrawal form from the Director of Education. The date that the student obtains a withdrawal form and notifies the official intent to withdraw triggers the official date of withdrawal.

In the event the student does not complete an official withdrawal form, providing notification to an official of the institution acting in an official capacity triggers a withdrawal date. Intent to withdraw may be given orally or in writing. If a student provides notification to the institution by mailing a letter, the date triggering the withdrawal is the date the letter is received. Further, an institution always has the option of using the date of a student's last participation in an academically related activity.

For students who would have provided official notification to the school, but for circumstances beyond their control were unable to do so, the school will use the student's last date of attendance as the date of withdrawal.

If a student who began attending and has not officially withdrawn fails to earn a passing grade in at least one course offered over an entire period, the institution must assume, for Title IV purposes, the student has unofficially withdrawn, unless documentation shows that the student completed the entire period by attending academically related classes.

Students who have received Federal Student Aid and withdraw from an institution prior to completion of the required period for coursework may be liable for a prorated return of funds received. A R2T4 is prepared to determine if the student or the institution are required to return funds. Failure to officially withdraw may seriously affect a student's eligibility for readmission or for transfer to another institution.

All students who terminate their attendance at this institution either by withdrawal, transfer, or graduation are required by Federal law to complete an exit counseling online or in person or a paper form prior to leaving the institution.

Determination Date / Withdrawal Date (Official / Unofficial Withdrawal)

The actual last date of attendance would be the last day the student was physically in attendance. A withdrawal date on a student who had been previously attending could be up to, but not to exceed 14 calendar days from that student's actual last date of attendance. An active student officially withdraws when they notify the school's administrative office of their intention to withdraw from school. An active student is considered unofficially withdrawn when they have been absent for 10 consecutive school days (14 calendar days) from their last date of physical attendance without notifying the school's administrative office.

Re-entry Students/Interruptions/Leave of Absence

Students who have been terminated or withdrew from school may re-enroll (if determined eligible) within 180 days and will not incur additional charges. Students who have been terminated or withdrew from school and re-enroll (if determined eligible), after more than 180 days will pay a \$15.00 registration fee and will be charged for contracted hours at the current tuition rate. All re-enrolling students will be provided the school's Re-enrollment Policy and will be evaluated by the school Director of Education for placement in the curriculum and kit needs. Re-enrolling students may be required to purchase the current school kit. Students applying for re-entry or transfer-in from other schools may be required, as a condition of enrollment, to bring delinquent prior student loans to a current status. A determination of Satisfactory Progress will be made and documented at the time of withdrawal or beginning of a Leave of Absence. That determination of status will apply to students at the time they return to school. The student may appeal a negative Satisfactory Progress determination according to the appeal policy. Elapsed time during a Leave of Absence does not affect Satisfactory Progress and will extend the contract period by the same number of days as the Leave of Absence. Students re-entering after exiting the school will not be evaluated as new students and consideration will be given to the student's progress status at the time of previous withdrawal. Re-enrollment is at the discretion of the school administration.

Return of Title IV Funds

When a student ceases attendance at this institution, a Return to Title IV calculation is performed to determine the amount of aid a student has earned for the payment period in which their last date of attendance occurred.

The amount earned is the number of scheduled clock hours from the first day of the payment period to the last date of payment period divided by the number of clock hours in the payment period. This percentage is multiplied by all aid that could have been paid during the payment period to determine the amount of aid earned by the student. The amount earned is compared to the amount disbursed during the payment period.

If the amount paid exceeds the amount earned, the difference is returned to the department of education. If the amount earned exceeds the amount paid, the school will determine if the difference can be paid on the students' behalf.

EXAMPLE:

Payment period 450 clock hours

Student scheduled hours = 150

Pell paid \$1000.

Amount that could be paid \$1000

$150/450 \times \$1000 = \333 earned

$\$1000 - \$333 = \$777$ which must be returned to the Pell Program. Returned funds are returned in the following order:

1. Unsubsidized FFEL/Direct Stafford Loan
2. Subsidized FFEL/Direct Stafford Loan
3. FFEL/Direct PLUS (Parent)
4. Pell Grant
5. FSEOG

If the student has earned over 60%, it shall be considered that the student has earned 100% of the aid paid.

A Return will be made to the DOE within 45 days from the date of determination.

Student Loan Code of Conduct

The College of Wilmington understands that ensuring the integrity of the student financial aid process is essential to providing students fair and affordable access to higher education. The Code of Conduct prohibits activities which may create conflicts of interest in the student financial aid process between the institution and its students. This Code is in accordance with the requirements of the federal Higher Education Opportunity Act of 2008 ("HEOA") and incorporates all terms set forth in the HEOA. Accordingly, the College of Wilmington shall take reasonable steps to comply at minimum with the following principles in day-to-day financial aid operations:

- The institution's officers and employees may not receive directly or indirectly, points, premiums, payments, stock or other securities, prizes, travel, entertainment expenses, tuition payment or reimbursement, the provision of information technology equipment at below market value, additional financial aid funds or any other inducement from a guaranty agency or eligible lender in payment for securing applicants for FFEL loans.
- The institution or its employees may not provide names and addresses and/or e-mail addresses of students or prospective students or parents to eligible lenders or guaranty agencies for the purpose of conducting unsolicited mailings, by either postal or electronic means, of FFEL student loan applications.
- The institution will not allow any employee of the guaranty agency or eligible lender to perform any school-required function for a school participating in the FFEL Program, except exit counseling. The institution will not permit guaranty agencies to conduct fraudulent or misleading advertising concerning loan availability, terms or conditions.
- College of Wilmington will not permit an employee to enter into a consulting arrangement or other contract with an eligible lender.

- The institution will not permit an employee working in the student financial aid office to serve on an advisory board for an eligible lender.

Determining the Loan Period

The College has elected to use the Payment Period for all students.

DIRECT LOAN QUALITY ASSURANCE SYSTEM

Our institution is required by statute, 34 CFR 685.300(b)(9), to implement a quality assurance system within our financial aid office. Our financial aid director in concert with our third party servicer, Fame, initiates and maintains the quality assurance system. The President of the school will review and comment periodically on the effectiveness of this system.

Our financial aid director is responsible for updating the process to ensure our school complies with the Direct Loan quality assurance component.

The System

A. Reporting to the Common Origination and Disbursement (COD) System

a. Reporting Loan Originations

- i. Once an enrolled student has received a valid Institutional Student Information Record (ISIR) and has met all our enrollment requirements a financial aid profile is sent to our servicer, Fame. The profile consists of the student's enrollment/registration information and the aid the student is requesting.

Fame then reviews the information, cross-references the ISIR for any conflicting data, and then awards the student the appropriate aid.

- ii. The award letter is then retrieved by the school and provided to the student.
- iii. A loan origination record is submitted to COD by Fame.
- iv. The next business day Fame retrieves the student's loan origination acknowledgement from COD. If necessary, any errors or rejections are reviewed and/or corrected and resubmitted to COD.

b. Reporting Loan Disbursements and Adjustments

- i. Based on the processing of loan disbursements (See Disbursing Loan Funds below), at the end of the workday Fame creates a loan disbursement file for transmission to COD. The file consists of all loan disbursements processed that working day.
- ii. The file acknowledgement is then retrieved by Fame from COD.
- iii. This file is imported into Fame's internal student accounting system.
- iv. All files are reviewed. All accepted and rejected student files are identified at that time.

- v. If there are any errors or rejected files Fame promptly corrects the affected file(s) and resubmits a new file to COD.
 - 1. Fame then retrieves the corrected file they submitted for corrections.
- vi. Fame then reviews the corrected file and once again identifies any errors or rejections.
- vii. Once all the disbursement files have been accepted by COD, Fame creates a disbursement roster containing all the accepted student disbursement records.

B. Disbursing and Returning Loan Funds

a. Disbursing Loan Funds

- i. Our financial aid office and Fame coordinate the disbursing of loan funds. Our primary focus is to ensure that students are eligible for Title IV aid at the time of disbursement. Both offices verify that all awarding issues have been satisfied (i.e. verification, C-Codes, loan origination, etc.). Our school will not disburse an “interim” disbursement to students before awarding issues have been resolved.
- ii. Prior to requesting the student’s first disbursement of student loans, the school performs or verifies that the student has completed loan entrance interview counseling.
- iii. Once we have confirmed that the student has met all eligibility requirements (e.g. admissions, successful completion of a payment period, maintaining SAP, accepted award letter, COD accepted signed promissory note, etc.) we then log into the secure Fame institutional portal and request the student’s disbursement.
- iv. Fame reviews each student disbursement request with the goal of ensuring that the request is accurate and appropriate. If any question(s) arise, Fame will notify the school via a “compliance delay” notice before processing the student’s disbursement request. The student’s disbursement will be processed after the discrepancy has been resolved and no remaining eligibility issues exist.
- v. Fame processes the loan disbursement request in their internal accounting system.
- vi. Fame creates and transmits a disbursement file to COD via the CPS (See Reporting Loan Disbursements and Adjustments above).
- vii. After ALL of the transmitted loan disbursement records have been accepted by COD, Fame creates a “disbursement roster” which we download from our school portal.
- viii. We then review the roster for appropriateness and accuracy.
 - 1. We notify Fame if there are any variations between our expected disbursements and the actual disbursement roster.
- ix. Fame then requests the funds using the G5 system. The funds are wired directly into our institutional Title IV (federal funds) account.

- x. The next business day we verify that the funds have been transmitted from ED into our federal funds account. We instruct Fame if the funds have not arrived or are different then the total amount on our disbursement roster. Next, we transfer those funds from the federal funds (Title IV) account to our operating account.
- xi. We credit the student's account with the amount of their disbursement(s). In addition, we notify the student that day of the disbursement, as well as, informing them they have the right to rescind all or part of the loan disbursement.
 - 1. We post the student's account/ledger the date of the roster, which coincides with the date ED accepted the student disbursement.

This system is developed to ensure that all reporting of disbursements are in compliance with the USDE's 15 day reporting, posting, and notification requirements.

b. Returning Loan Funds

- i. Once it has been determined that a student has ceased enrollment our financial aid office immediately performs refund calculations. (Title IV and Institutional)
- ii. If it has been determined that there is a Title IV refund due ED, the financial aid office notifies the accounting office of the refund amount that is needed to be deposited into the school's federal funds (Title IV) account for this student refund.
- iii. Accounting then deposits the refund amount into the federal funds account. This may take place by a transfer of funds from the operating account to the federal funds account, or if for some reason this is not available a physical check is written and a deposit is completed.
- iv. On the date that the refund was deposited/transferred into the federal funds account, the accounting department notifies the financial aid office of this transaction.
- v. Once the financial aid office is notified of the refund transaction, we immediately notify Fame with a Refund Request form via email, fax, or the school financial aid portal.
- vi. The school posts the refund to the student's account/ledger
- vii. Fame reviews the Refund Report for accuracy and appropriateness (i.e. T4 program, award year, amount, etc.).
- viii. Fame then posts the refund(s) in G5.
- ix. Once G5 retrieves the funds from the school's account and acknowledge the deposit, Fame then notifies COD of the student's refund.
- x. COD is notified of the date G5 acknowledged the refund, the T4 program refunded, as well as, the corresponding award year.

Making and Posting Student Title IV refunds are a high priority of our institution. Accuracy and timeliness is of utmost importance. A large amount of our Financial Aid training budget is dedicated to this issue. The ownership of the institution understands the complexity of this subject and strives to be in complete compliance.

C. Disbursing the correct loan amount to the correct student

a. Disbursing the correct loan amount

- i. With the assistance of our third party servicer, Fame, we have a two-tier system of disbursing funds and adjustments.
- ii. Before any disbursement is initiated a student award letter has been generated by our Third Party Servicer and accepted by the student. We review this award letter for accuracy and appropriateness prior to delivering it to the student.
- iii. The student's scheduled award is created and an estimated date of disbursement is generated.
- iv. All student loan origination records are submitted to COD at the time the award letter is generated.
- v. All loan origination records contain the amount and expected date of all anticipated disbursements for a student.
- vi. Prior to disbursing any loan funds an "accepted" loan originated record must be on file for each student loan.
- vii. The submission of the student loan disbursement record to COD must correspond identically with the student loan origination record, if not, COD rejects the record.
- viii. No student disbursement is initiated until all disbursement records are accepted and processed by COD.

b. Disbursing to the correct student

- i. After reviewing each student's enrollment and financial aid information we submit a request for disbursement to our servicer, Fame. When requesting this disbursement we review the expected/anticipated disbursement for this transaction.
- ii. Fame reviews the request for accuracy and appropriateness. If the request is not accurate or appropriate (i.e. too early), the request is suspended until the discrepancy is resolved.
- iii. Fame submits the disbursement to COD (the amount, award year, T4 program, etc).
- iv. Fame retrieves the accepted disbursement record from COD.

- v. The accepted disbursement record is then placed on a student disbursement roster and made available to us.
- vi. We then review the roster for appropriateness and accuracy.
- vii. If we do not have any issues, Fame then requests the roster funds via the G5 system.
- viii. The accounting office notifies financial aid that the funds have been transmitted from ED to our federal funds account.
- ix. Accounting posts the roster detail to each individual's student account.
- x. Once posted, Financial Aid prints all student account transactions for that day and cross-references this report with the disbursement roster from Fame.
 - 1. Any discrepancies are identified and resolved at this time.
 - 2. We notify the student that the disbursement has taken place and inform them of their right to rescind all or part of the loan disbursement.

In Summary,

To ensure accuracy, Accounting verifies that the funds transmitted from ED to the school's federal funds account equal the grand total of Fame's roster. Accounting posts the roster amount to each individual student account. Financial Aid verifies that the funds posted to the student's accounts equal the amount indicated on Fame's disbursement roster.

D. Completing monthly reconciliation and Program Closeout

- a. Fame practices monthly reconciliation in a number of ways. At the beginning of every month a Fame reconciliation specialist will print out a G5 summary for our school and compare that summary to the Fame journals using inception to date for each Title IV program per award year. Any differences are identified, reviewed, documented and fixed/resolved when necessary. In addition, the Fame Disbursement Differential YTD Report is again reviewed to identify any discrepancies. A report is also run from EdExpress to identify and correct any disbursements or adjustments that have not been accepted by COD. The Fame Monthly Reconciliations – Reconciliations of Fame to G5 & COD is included at the end of this document as Schedule A.
- b. To complete monthly reconciliation for Direct Loans, Fame also utilizes the DLSAS report provided by COD every month. A reconciliation specialist at Fame will review the ending cash balance for each institution. When the ending cash balance does not equal \$0, a reconciliation specialist at Fame will review, identify and resolve any outstanding issues. This issue is documented on the monthly spreadsheet. The Monthly DLSAS Reconciliation Steps instructions are included at the end of this document as Schedule B.
- c. Fame takes the necessary steps to complete yearly reconciliation. By completing and resolving errors and discrepancies on a daily and monthly basis, along with adhering to Fame

policies when disbursing aid to students, creating Title IV rosters and requesting and refunding money in G5, the yearly reconciliation of Title IV is usually a mere formality. Nevertheless Fame officially closes out the Direct Loan award year on behalf of each institution in COD by the deadline imposed by the USDE. In addition, Fame also provides critical data and reports for schools during their annual audit, USDE Program Reviews and upon demand from any client institution.

- d. Our accounting office in coordination with the financial aid office reconciles student disbursement rosters with all student records. This is done on a daily and monthly basis. Any discrepancies from federal funds deposits with student disbursement rosters are examined, reviewed, and rectified.
- e. We (nor Fame) do not “offset” disbursement requests with actual deposited refunds, therefore all federal deposits are reconciled with student accounts and actual disbursement rosters.

Schedule A: Fame Monthly Reconciliations – Reconciliation of Fame to G5 & COD

Reconciliation Fame to G5

- 1) On the 2nd or 3rd day of each month Fame prints out G5 Summary for each school
- 2) Fame takes each school’s G5 summary information (ex. 1-1-2014) – current date ‘and compare that to the Fame Journals Inception to date for Pell & Loans for award years (ex. ‘14-15’, ‘15-16’ & ‘16-17’)
 - a) If there are no differences Fame checks off G5 summary as being okay.
 - b) If there are differences Fame identifies what they are.
 - a. If the differences are due to timing of rosters or refunds posted in Fame that have not yet posted to G5 as of the date of the G5 report. (ie: G5 summary balance can be found on Fame Journals run) then indicate on G5 report that it is okay and differences are due to timing!
 - b. If we find that there are discrepancies that are not due to timing, we identify the discrepancy(s) and resolve them.
 - c. Once they are identified we need to document what they are and what needs to be done to resolve outstanding issues... document them at the bottom of G5 Summary and indicate the date that each item is resolved.
 - d. Each month should then be filed under the appropriate month

Reconciliation Fame to COD

- 1) On the 2nd or 3rd day of each month Export Fame Differential Report (Pell & Direct Loans) into excel on desktop.
- 2) Differential report compares student balances in Edexpress (COD) to what has been recorded in Fame

- 3) Review each student's balance and identify what the difference is due to...
 - a. Identify if the discrepancies are due to timing in posting of refunds (most common). Write timing refunds next to student if appropriate.
 - b. If not refund related, research is needed to document and resolve the issue on a timely basis.
 - i. Indicate on the differential report date that issue is resolved.
 - c. Put differential reports in appropriate folder on N drive "N Monthly Reconciliations"

Edexpress Actual Disbursement Error List

- 1) Each week access and save into excel spreadsheet a report from Edexpress to identify disbursements that have not been accepted by COD.
 - a. Select "print" then select Direct Loan Tab.
 - b. Report is "List – Actual Disbursements"
 - c. Select the "multiple" radio button
 - d. Select "file" radio button and select appropriate destination for file
 - e. Select "Selection Criteria" and then select "Disbursement Status"
 - f. Enter "e" (for error) for the actual disbursement status then select ok
 - g. Enter a "to date" on the main print page to 10 days prior to the current date

- 2) Report must be forwarded to a reconciliation specialist for review

Schedule B: Monthly DLSAS reconciliation Steps

1. Go into S Drive and find 'reconciliations folder' – open folder
2. Files are labeled by Years (ex.'2014', '2015', '2016', etc.)
3. Find DLSAS month that is being reconciled
4. Save Excel file to new folder on your Desk top ("march reconciliations")
5. Files only have G & E codes for school identification – helps to add "school name of school to spreadsheet"
6. Open spreadsheet and Insert Column next to G codes (Column 'C').
7. Go back to prior month file and copy over table Columns T and U ("school key") and put it in the exact same place on new spreadsheet@ top of column T. (important to put into same spot)
8. Then go to prior month Column C and copy over vlookup formula (Note table must be in the same location as prior month in order to work). Then copy and drag formula populating name of schools.
9. Note: (if you add new schools need to update table)
10. Need to reconcile ending cash balance on spreadsheet
11. If ending cash balance is 0 ---you are done!
12. If there is an amount in field it is usually to do timing: Usually roster or refund or some combination of the two.
13. Most often amount is a roster created @ and of the month. Go into Fame Jnl's get roster number and get all school rosters with that #. Export it into reconciliation folder for documentation for audit purposes. Also print them all out to facilitate reconciliation.

In the event it is not apparent you need to reconcile DLSAS Loans with Fame Loans (total Aid Disbursed) go into DLSAS tools and run DLSAS report for that month for College of Wilmington.

14. Recommend you set up a separate folder on your desk top for each school you need to reconcile. (If we add new schools)
15. Run Cash Summary DLSAS(print out) – reconcile cash first – (Fame Jnl’s to G5 piece of DLSAS Summary report top number “NET Drawdowns/Payments”
16. Then run DLSAS loans (do not check detail box) --- run by SS# or Loan ID. Export to Folder on desk top.
17. Open Excel file (‘open all files”) to DLSAS loan file. **Open delimited file by space and save to excel.**
18. Next highlight entire spreadsheet and sort by Column B. this will produce file by loan ID.
19. Next insert column next to loan ID on Spreadsheet
20. High light loan id column and go into Excel Data tab and click on “TEXT to Column” tab (fixed) and place separation line after SS#
21. This will separate loan Id between SS# and other info. Go back in and delete column just created (leaving only SS#)
22. Delete other columns gross etc. leaving just two columns on “Spreadsheet SS#” and “net amount of loans”. This leaves us with multiple SS#’s and individual Loans (Sub, Unsub, plus)
23. We don’t want individual loans by SS#. We want to get DLSAS reports in Format with SS# and total loan amounts.
24. In order to sum loans by SS# we need to create a pivot table in excel.
In order to do this we need to Label columns header (SS#; Total)
 - a. Next we need to create a pivot table to sum SS# by total loans.
 - b. Highlight the two columns and go to insert tab in excel go to pivot table.
 - c. One pivot table is created put SS# on left side and sum Totals.
 - d. (Note: you may have to use drop down box to get sum function instead of Count.
 - e.
25. You should have a list of total loans by SS# with total that ties to DLSAS Cash Summary “Total Net Booked Disbursements” portion.
26. Next you want to compare Fame “total aid disbursed” loans to DLSAS loan totals that you just created by SS#.
27. Export Fame “total aid disbursed” in excel into folder on desk top. Strip out pell, and anything that is not a loan.
28. Sum loans across. Copy Totals (which is a formula) to next column and save using special paste function to get to integers.
29. Delete rest of columns to get SS#, Name, Total Loans (integer).
30. Sort spreadsheet to get rid of zero’s to help facilitate reconciliation.
31. Then resort spreadsheet by SS#.
32. Copy pivot table DLSAS File (SS# loans) and paste on same line as Fame total Aid file that you just created.
33. 17) Copy loan amounts over next to Fame loan amounts. Using Sum function calculate the difference between two files.
34. 18) You may need to delete ‘0’ files to get SS#’s to line up exactly. This should give you differences between files!

Satisfactory Attendance Progress

To maintain eligibility for Title IV funds a student must be making satisfactory progress according to the following standards.

Evaluation Period

Students are evaluated for Satisfactory Progress based on actual hours of attendance and the financial aid payment periods in their program (See Scheduled Evaluations and Timeframe Chart):

Academic Grade Evaluation

The student must maintain a cumulative grade of 78.

Maximum Time Frame

The student must complete the program within 150% of the normal length of the program.

Completion Rate/Attendance Progress Evaluation

Students are required to attend a minimum of 66.67% of the hours possible based on the applicable attendance schedule in order to be considered maintaining satisfactory attendance progress.

Evaluations are conducted at the end of each evaluation period to determine if the student has met the minimum requirements. The attendance percentage is determined by dividing the total satisfactorily completed clock hours by the total number of scheduled clock hours. At the end of each evaluation period, the school will determine if the student has maintained at least 66.67% cumulative attendance. This will insure the student will complete the program within the maximum time frame.

SCHEDULED EVALUATIONS AND TIME FRAME FOR COMPLETING 150% OF NORMAL TIME EXPRESSED IN CLOCK HOURS

Cosmetology Program

(1500 clock hours)

Evaluation at 451, 901 & 1201 clock hours

Day School	Normal Time Frame	Maximum Time Frame
Student Weekly Contract [35 hours]	<i>43 weeks</i>	<i>64.5 weeks / 2250 Scheduled Clock Hours</i>
Night School	Normal Time Frame	Maximum Time Frame
Student Weekly Contract [22 hours]	<i>69 weeks</i>	<i>103.5 weeks / 2250 Scheduled Clock Hours</i>

Cosmetology Instructor Program

(800 clock hours)

Evaluation at 401 clock hours

Day School	Normal Time Frame	Maximum Time Frame
Student Weekly Contract [30 hours]	27 weeks	40.5 weeks / 1200 Scheduled Clock Hours
Night School	Normal Time Frame	Maximum Time Frame
Student Weekly Contract [12 hours]	67 weeks	100.5 weeks / 1200 Scheduled Clock Hours

Therapeutic Massage Program

(740 clock hours)

Evaluation at 371 clock hours

Day School	Normal Time Frame	Maximum Time Frame
Student Weekly Contract [30 hours]	25 weeks	37.5 weeks / 1110 Scheduled Clock Hours
Night School	Normal Time Frame	Maximum Time Frame

Student Weekly Contract [<i>12 hours</i>]	<i>62 weeks</i>	<i>93 weeks / 1110 Scheduled Clock Hours</i>
---	-----------------	--

Medical Office Administration

(730 clock hours)

Evaluation at 361 clock hours

Day School	Normal Time Frame	Maximum Time Frame
Student Weekly Contract [<i>30 hours</i>]	<i>25 weeks</i>	<i>37.5 weeks / 1095 Scheduled Clock Hours</i>
Night School	Normal Time Frame	Maximum Time Frame
Student Weekly Contract [<i>12 hours</i>]	<i>61 weeks</i>	<i>92 weeks / 1095 Scheduled Clock Hours</i>

Special Grading Circumstances

The school does not have non-credit remedial courses, repetitions or incompletes. A withdrawal is a withdrawal from school and therefore, has no impact on satisfactory progress. The clock hours for transfer students will be counted as attempted and completed for purposes of satisfactory progress.

Determination of Progress Status

Students meeting the minimum requirements for academics and attendance at the evaluation point are considered to be making satisfactory academic progress until the next scheduled evaluation. Students deemed not maintaining Satisfactory Progress may have their Title IV Funding interrupted, unless the student is placed on warning or wins an appeal resulting in a status of probation.

Warning

Students who fail to meet minimum requirements for attendance or academic progress may be placed on warning and considered to be making satisfactory progress for one evaluation period. During the duration of the warning period the student will be eligible for aid. The student will be advised in writing on the actions required to attain satisfactory academic progress by the next evaluation. If at the end of the warning period, the student has still not met both the attendance and academic requirements, he/she may be placed on probation and be eligible for aid or if not placed on probation, the student may be deemed ineligible to receive Title IV funds.

Appeal

A student who is still not making progress at the end of the warning period becomes ineligible for aid. A student whose aid has been terminated for not making progress, but feels that there were mitigating circumstances may appeal to the financial aid director. This appeal must be in writing and submitted within two weeks of the notice of termination or upon re-enrolment. Documentation of the mitigating circumstances may be required with the appeal. (Mitigating circumstances include, but are not limited to: illness or injury of student or a member of student's immediate family; death in the student's immediate family; or other trauma.) The student must explain what has changed in their situation that will allow them to achieve satisfactory progress by the next evaluation point. Appeal forms can be obtained from the school personnel. Upon approval of an appeal by the Appeals Board, the student's financial aid will be reinstated and the student will be placed on probation for one payment period. The student will be notified of the decision within 30 days. The appeal and decision documents will be retained in the student file.

Probation

Students can only be placed on probation and receive aid for one evaluation period upon winning an appeal. Additionally, only students who have the ability to meet the satisfactory progress standards by the end of the evaluation period may be placed on probation. The students will be advised in writing of the actions required to obtain satisfactory progress by the end of the probation period. If the student is not making progress at the end of the probation period the student may be terminated from school and no more financial aid may be paid to the student.

Reinstatement

A student's aid may be reinstated only if they meet the standard above or win an appeal.

Drug Awareness

The Drug Awareness Program is published in the Student Handbook and the employee handbook. The Drug Awareness Program is a responsibility of the President, Director of Education and Director of Financial Aid. Information on Drug Awareness is also communicated to students, faculty and staff during orientation.

The sale, use, possession, and/or distribution of controlled substances are prohibited on this campus. Students who are observed or suspected of the sale, use, possession, and/or distribution of illegal drugs may be suspended indefinitely from the institution.

Security Program

In order to ensure, protect, and preserve confidentiality of student financial aid records, all financial aid files are maintained in the Office of the Financial Aid Administrator in locked files. The Financial Aid Administrator is the only individual authorized to release information from financial aid files. The Financial Aid Administrator releases information only when it is necessary for the efficient operation of other government programs, administrators' requests, law enforcement or family inquiries that are permissible under FERPA.

Internal Control/Registrar/Business & Finance

Introduction

In these times of increased accountability, there is greater emphasis on internal controls than at any other time in the history of the College of Wilmington. This section will define internal controls and briefly cover the major points that should be of interest and concern to all faculty and staff.

Roles and Responsibility:

Every faculty and staff member has some responsibility for internal control, because all employees have some role in effecting control by their actions. Any weak link can cause an internal control system to fail. In addition, everyone has a responsibility to communicate, through appropriate channels, problems, deviations from established standards and procedures.

Standards, and violations of policy, regulation, or law.

Management is ultimately responsible and must assume ownership of the internal control systems within their areas of responsibility.

The president shapes the values, principles, and major operating policies that form the foundation for the College of Wilmington's internal control systems.

Senior administrators provide direction in the major functional areas for evaluating objectives, risks, and the associated internal controls.

The Director of Education and department chairs are responsible for designing and implementing internal control systems at detailed levels. They must also execute institution-wide control policies and procedures. Accompanying these responsibilities are both authority and accountability.

The Governing Board provides oversight on matters of internal control. Auditors, both internal and external, contribute to the effectiveness of internal control systems. They are not responsible for establishing or maintaining these systems, but they provide useful information in evaluating and improving such systems.

Components of Internal Control

Internal control systems consist of five interrelated components. They are derived from the way we do business and are in integral part of the various processes in use throughout College of Wilmington. These components are as follows:

Control Environment: This sets the tone of the organization and is the foundation for all other components. The factors in the control environment include ethical values, competence, and philosophy, operating style, assignment of authority and responsibility, and the attention and direction of the Governing Board and upper management.

Risk Assessment: This refers to the process of identifying and managing relevant risks in the achievement of objectives, including mechanisms to deal with the special risks associated with change.

Control Activities: These are the policies and procedures in place that attempt to ensure the organization's objectives are achieved. The specific control activities include approvals, authorizations, verifications, reconciliations, and reviews of operating performance, security of assets and segregation of duties.

Information and Communication: Necessary information must be identified, captured and communicated in a useful form and on time. This information includes data, both internal and external, related to operations, finances and compliance that makes it possible to operate and control College of Wilmington. Communication must occur in the broadest sense, flowing up, down and across the organization and communication must be effective both inside the organization and external to it.

Monitoring: This involves assessing the quality of all systems; performance over time. All internal control systems must be monitored, with ongoing and periodic evaluations being conducted.

Effectiveness

Internal controls help College of Wilmington achieve its performance targets and prevent loss of valuable resources. They also help ensure reliable financial reporting and compliance with policies, regulations, and laws; and help the college avoid pitfalls, damage to its reputation, and surprises with negative consequences.

Management Integrity

Management integrity, or the moral character of persons of authority, sets the overall tone for the College. Management integrity is communicated to employees through employee handbooks and procedural manual. In addition to communicating management integrity, policy manuals facilitate training to employees. However, management's enforcement of policies is the major indicator of an organization's commitment to a successful internal control system.

Competent Personnel

The College of Wilmington strives to recruit and retain competent personnel. The retention of employees increases the comparability of financial records from year to year. Furthermore, an auditor's confidence in the underlying accounting records increases as he observes the reliability of the organization's personnel.

Segregation of Duties

The College of Wilmington realizes that a segregation of duties is critical to effective internal control because it reduces the risk of mistakes and inappropriate actions. An effective system of internal control separates authoritative, accounting, and custodial functions. For instance, one employee opens incoming mail, a second employee prepares deposit slips for daily receipts, while a third employee deposits receipts in the bank. This prevents the opportunity of one employee to misappropriate incoming funds.

Records Maintenance

Maintaining appropriate records ensures that proper documentation exists for each business transaction. Records management involves storing, safeguarding and eventually destroying tangible or electronic records. Also, appropriate back-up deters an employee or management from creating phantom transactions in the underlying accounting records. A good record management program reduces operating costs, and improves efficiency and minimizes the risk of litigation.

Safeguards

Safeguards prevent unauthorized personnel from accessing valuable company assets. Safeguards are physical, such as locks on doors, or intangible, such as computer software passwords. Regardless of the methods, safeguards are a necessary feature of an organization's internal control system. Not only does the College have to protect inventory, cash, and supplies, but also blank checks, company letterhead and signature stamps are items that require safeguarding too.

The College has a systematic process auditing and budgetary controls. This starts with monthly bank account and expense reconciliation, thorough review of monthly financial statements from the College's CPA, and analysis of monthly expenses compared to budget. This review allows Administration the opportunity to make adjustments in expenses if needed. All financial statements follow Generally Accepted Accounting Principles. In addition to monthly controls, the College's financial and financial aid is audited annually by an independent CPA authorized to conduct audits on behalf of the U.S. Department of Education. These internal and external audits and procedures are in compliance with state and federal requirements and are reviewed by the respective regulatory agency on an annual basis.

Administration established financial controls and acceptable business practices that are in compliance with regulatory requirements as evident in the College's external audit reports.

Examples of these controls include division of duties between the financial aid and business offices, daily receipts are reconciled on a daily basis, money is kept in a locking safe until being deposited into the bank account, internal and external auditing of financial aid compliance, and timely financial reports from the College's CPA.

All College employees who handle institutional funds and/or revenues from all sources are covered under the College's Employee-Dishonesty policy.

The College of Wilmington has qualified personnel who are responsible for proper record-keeping, reporting and auditing. The College President has 20 years' experience in career school education, the Campus Director has 19 years' experience in career school education, and the Financial Aid Director has 19 years' experience in Financial Aid administration. In addition, the College's Vice President/Compliance Coordinator has more than 37 years' experience in career school education having served as President of a large proprietary College. She routinely performs internal audits of financial and financial aid matters.

The Financial Aid Director holds a Bachelor of Science degree in Accounting. She has more than 19 years' experience administering Financial Aid under the Title IV of the Higher Education Act of 1965, as amended. The Director routinely participates in training through Department of Education training modules, located at IFAP.gov, and consults with FAME as well as attends Webinars hosted by FAME. She remains current on changes in financial aid policy and procedures to ensure institutional compliance. The Director maintains membership in the NC Association of Student Financial Aid Administrators. As of the new 2016 Award Year, the College contracted with FAME to assist with the Financial Aid Process. The Financial Aid Director is also assisted by a Financial Aid Planner. This Planner holds a BA degree in Psychology and has extensive experience in billing and financial reporting.

The College submits annual audited financial statements prepared by an independent certified public accountant to the U.S. Department of Education and to COE within six months following the close of the fiscal year. These Financial Statements are prepared in accordance with generally Accepted Accounting Principles (GAAP). The audit is performed in accordance with Generally Accepted Government Auditing Standards (GAGAS).

Internal controls are essential processes within any successful organization. They are everyone's responsibility. Internal control systems comprise a number of related components that are all dependent on each other. They are only effective when they are understood, accepted, and used to the benefit of the organization. Internal control systems provide meaningful, valuable tools to help College of Wilmington become the model community college for the 21st century.

The Director electronically submits a list of all students on the rolls within thirty days after the date of registration. This list includes the student's name, status, and grade level. This list is used when determining a student's eligibility, as to whether they are full-time, part-time, half-time, or less. Additionally, the Director keeps the Financial Aid Office abreast of all changes in enrollment, satisfactory academic progress, and administrative withdrawals. There is software in use that provides for constant access to information necessary to the financial aid process.

There is software in use that allows a constant access to limited Business and Finance information. However, communication with the Business Office is ongoing. All monies are drawn down from the Department of Education by FAME as of the New Award Year 2016. The Financial Aid Director does not disburse any funds.

All Federal Aid refunds to students are calculated and disbursed by the Business and Finance Office. The Financial Aid Office and the Business Office reconcile accounts on a monthly basis. There is a process by which reports are requested from the Department of Education's Common Origination Division, and reports from Financial Aid are reviewed with the Business Office to assure accuracy and completion of the reconciliation.

Student's Right to Know **Campus Crime Information**

Statistics on campus crime is compiled and maintained by the Director of Financial Aid. An annual report is submitted to the U.S. Department of Education based on information obtained thru visual observation, incident report forms, or the Wilmington Police Department.

This report can be viewed and a hard copy of this information can be printed from our website at www.collegeofwilmington.edu under Student's Right to Know.

Crime Report Distribution Policy

On or about October 1st of each year we distribute the crime report to our students and our staff by passing it out in the classroom, putting a copy of the report in each staff person's mailbox and posting it on the bulletin board. The report is also given to perspective students and employees.

Net Price Calculator

College of Wilmington provides a Net Price Calculator which is accessible via our website at www.collegeofwilmington.edu / Student's Right to Know / Net Price Calculator. This is designed to give our students an indication of how much and what types of financial aid they might qualify for while attending school full-time in the academic period indicated.

The calculator measures the financial strength of the student's family, and uses other facts the student provides to estimate the amount of grants, scholarships, and other financial aid that might be available to them. The "net price" is the difference between that amount and the cost of attendance.

The estimates generated by the template do not represent a final determination, or actual award, of financial assistance or a final net price; they are only estimates based on price of attendance and financial aid provided to students in a given academic period.

Graduation, Retention, and Placement

Graduation, Retention, and Placement Rates for Title IV eligible programs are provided for your review at the school's website. Please feel free to visit www.collegeofwilmington.edu and read the information provided under the Student's Right to Know / (Program of your choice). The information will be updated yearly as required.

Definitions

Satisfactory Academic Progress (SAP) -Maintaining the required cumulative GPA and completion of courses at a rate that meets the standards enumerated in this policy.

Maximum Time-frame -Specific time-frame set by the Higher Education Act to receive financial aid. HEA sets a 150% limit of the normal program's limit.

Transfer Credits - Courses accepted at this institution for credit from another institution. The Office of the Registrar evaluates transfer credits.

Qualitative Measure -Measurement of a student's progress consistent with graduation requirements for the program of study.

Quantitative Measure -Time-frame the student has to complete their program of study and a minimum number of credit hours the student must complete at each stage of the process or at the end of each semester.

Attempted Credit -A course a student schedules and does not drop during the add/drop period, but remains on the students transcript.

Earned Credit -A course in which a passing grade has been receive. W (withdrawal), I (incomplete), A (audit) and F (Failure) are not considered as earned credits for SAP purposes.

Incomplete -A grade of "I" in an attempted course will not be counted as credit until the course is completed. Students will have 30 days upon return from summer vacation or Christmas vacation to remove the "I". If the "I" is not removed within the stated time, it will be counted as an attempted course.

Financial Aid Suspension -Termination of financial aid after being given a chance to successfully meet Satisfactory Academic Progress Policy.

Appeal -A student who is not meeting SAP policy may petitions the institution for a change in its position and requests reconsideration of the suspension to receive financial aid.

