# POLICIES AND PROCEDURES MANUAL

**Foothill Community College** 

Financial Aid and Scholarship Office

Last Revised April 2017

**Foothill College** 12345 El Monte Road Los Altos Hills, CA 94022

# Foothill-De Anza Community College District

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It is the policy of the Foothill-De Anza Community College District not to discriminate on the basis of race, sex, physical handicap, religion, color, creed, national origin or age in any of its educational and employment programs, activities, policies, practices and procedures. Contents are subject to change.

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#### **PART I**

#### INTRODUCTION

This manual provides an overview of the policies, procedures, and practices of the Foothill Community College (FH) Financial Aid Office (FAO). The policies and procedures in this manual are intended to ensure that the FH FAO is in compliance with regulatory and audit requirements and office best practices. While this document attempts to cover all major areas of financial aid, it is not all inclusive and is subject to change. Additionally, it does not supersede and should not be viewed as contrary to federal or state rules and regulations or statutes governing financial aid programs. Policies and procedures that may have been omitted in the writing of this document may be established in operational procedures or in federal or state manuals. At all times, students may refer to the appropriate federal & state regulations that guide financial aid program administration for additional information.

The FH FAO may review and amend this document on at least an annual basis. In some cases this document will have certain sections updated more frequently. For the sections that need updating they will be updated by the Director of Financial Aid, their designee, or a superior at the campus. The coversheet indicates the last time any section of the document was amended. Until a revised and printed copy of this document is available for review, the prior document remains active and in effect.

The goal of financial aid is to ensure access to and help with ongoing success in college for those, who due to financial disadvantages might be denied the opportunity for post-secondary education. The FH FAO maintains a financial aid delivery system to provide timely disbursement of federal, state, and private funds to those eligible students to assist them in entering and remaining in college. We believe that each person has dignity and self-worth and is entitled to an equal right to college access and the right to develop his or her potential through quality education and learning opportunities. We hope access to these financial aid programs help to achieve this goal. While the FAO tries to actively seek out eligible students, it is our hope that students in financial need also seek out and take advantage of the services that our office provides.

#### **PART II**

#### **ADVISORY COMMITTEES**

Often rules, regulations, and directives are written by state and federal agencies that leave some flexibility for local discretion. For this reason, advisory committees have been established. By bringing together people who also represent several areas and interests, we hope to include as much input and advice as possible. Thus, both official and ad hoc advisory committees are an important and integral part in the administration of the programs of the FAO.

#### **Financial Aid Advisory Committees**

1. Scholarship Final Selection Committee:

Chair: Director of Financial Aid, FH

Foothill-De Anza District (FHDA) Foundation Representative

FH employee at large, outside of the FAO

2. Scholarship Review Subcommittee:

Academic Senate approved representatives Classified Senate approved representatives Administration Representatives (when available)

Community members (selected in conjunction with Foundation)

3. Satisfactory Progress Maximum Timeframe Appeals Review Committee:

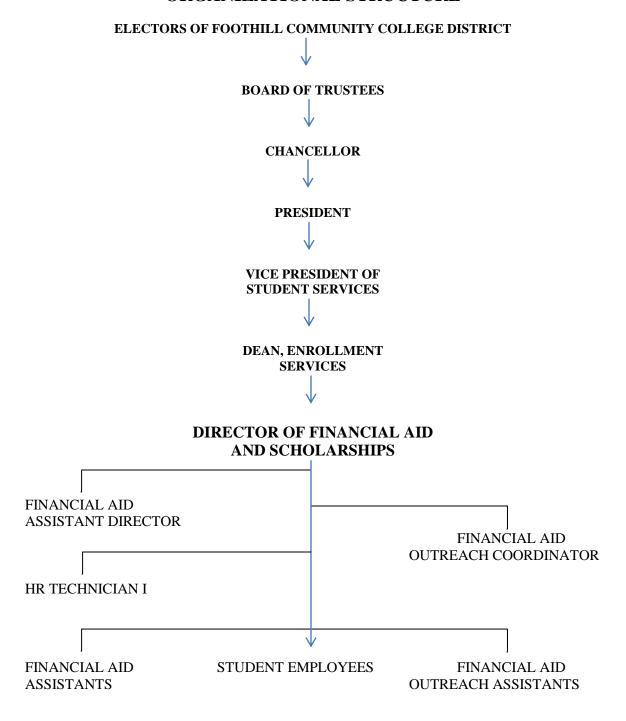
Director of Financial Aid Or Assigned Designee Financial Aid Coordinator(s) FH counselor(s)

4. CA Board of Governors Fee Waiver (BOGFW) Appeals:

Dean of Enrollment Management Classified representative(s) Faculty representative(s)

# **PART III**

# ORGANIZATIONAL STRUCTURE



#### **PART IV**

### GENERAL POLICIES AND PROCEDURES

#### **Ability to Benefit**

Ability to Benefit (ATB) methods of qualifying for Title IV Federal financial aid were eliminated as of 7-1-2012 by the U.S. Department of Education (DOE). A student who <u>first</u> enrolls in a financial aid eligible program after 7-1-2012 is not eligible for federal financial aid if they do not have a H.S. diploma, a Home School diploma, a General Educational Development (GED) certificate, or a state approved equivalency.

The following two paragraphs on ATB still pertain to students who were <u>first</u> enrolled in a financial aid eligible program <u>prior</u> to 7-1-2012. If the prior enrollment is within the District we will review for ATB eligibility ourselves. If outside the District, we will use self-certified reporting to the FAO of completed units prior to 7-1-2012 and ATB eligibility, unless there is reason to suspect inaccurate information, at which point we may require transcripts or other academic records.

ATB is designed for those college students who do not have a H.S. diploma, a Home School diploma, GED, or a state approved equivalency. In addition to information provided from the Free Application for Federal Student Aid (FAFSA) and the FH application for admissions, the FAO may use a supplemental document to determine, as reported by the student, whether they have the qualifying diploma or equivalent. If they do not, then the student must go to the Assessment Center, get tested, and those results will be entered into the Banner system. Alternatively, starting with the 08-09 academic year, the student can take the ATB form to a FH counselor to verify that a minimum of 6 units were completed towards an eligible degree or certificate. If the student meets or exceeds the FH ATB assessment requirements or if they have completed the minimum units, they would be considered to have met that eligibility requirement for financial aid. A student who passes the ATB test is eligible for aid in the term they were tested and going forward. A student who passes the 6 degree applicable units is eligible for the time periods after the 6 units are completed.

For students first enrolled before the 7-1-2012 change in regulation; if the student does not meet the FH ATB requirements, they would not be considered to have met that eligibility requirement for financial aid and would have to pursue one of the following options to be eligible for financial aid.

- 1. Try taking a different ATB test or retake the ATB test(s) again
- 2. Complete 6 units towards an applicable District degree or eligible certificate
- 3. Complete the GED requirements
- 4. Complete other federally approved processes for showing ATB

As a general rule the FH FAO does not regularly collect or maintain high school diplomas, GEDs, or state proficiency proof, regardless of what the student reports on the

FAFSA, reports to Admissions and Records Office (A&R), or their age at time of entry. The exception is if a specific financial aid program requires it or in some cases the FAO may require proof of a H.S. Diploma or the equivalency if we have reasonable doubt or conflicting information between the FAFSA, any additional paperwork, what a student tells our office, A&R, etc. If that reasonable doubt exists we will ask for proof. We may then follow-up with research on the Web, contact the County Board of Education, the State Department of Education for the state in which the H.S. is located, or other means, depending on our needs.

#### **Academic Year**

FH uses a quarter system to define its academic year (AY). This means all units are contained within a quarter length time period (12 weeks), with summer courses being condensed to 6 or 8 weeks, in most cases, but still existing within the 12 week total length summer term. The AY uses summer quarter as the header and ends with spring quarter. More information is available on the following website.

Foothill College: http://www.foothill.edu/schedule/dates

#### Accreditation

FH College is accredited by the Accrediting Commission for Community and Junior Colleges (ACCJC) of the Western Association of Schools and Colleges (WASC). More information is available on the following website.

Foothill College: <a href="http://www.foothill.edu/president/accreditation">http://www.foothill.edu/president/accreditation</a>

# **Campus Abroad Information**

General Foothill College Campus Abroad information is available on the following website: <a href="http://www.foothill.fhda.edu/campusabroad/">http://www.foothill.fhda.edu/campusabroad/</a>

#### **Communication with Students**

It is the policy and practice of the FAO to communicate through a student's MyPortal account, via batch emails, via personalized emails from staff in some cases, or via phone calls, and appointments, when necessary. At this time the FAO does not use text messaging. If in the future our population responds better to a text communication mechanism, or other yet to be embraced technology, we would investigate its usefulness.

All students who have provided a financial aid email address from the FAFSA will receive the following batch emails from the FH FAO. At the time FH FAO receives their FAFSA the first FAO email gets sent to them. This first email tells them how to sign in

to their MyPortal account, to check for required forms, and to make them aware of a possible BOG Fee Waiver award. The student will also receive an email when a non-BOG Fee Waiver award is made to their account. This second batch email tells them to check their MyPortal for an award, but only comes once at the initial awarding of additional funds, generally after complete packaging has occurred. If an awarded student chooses to accept Direct Loans they would receive an email when their Master Promissory Note (MPN) is made available. This third batch email gives them the steps to access an MPN and only occurs after we have received an accept loan origination record from the Common Origination and Disbursement (COD) system. Finally, after loan funds have been disbursed into their student account they receive a fourth batch email indicating their loan funds have been disbursed and their rights about returning the funds to the college with no fees or interest within the allowable timeframe.

# Conflicting Information (34 CFR 668.16(f or g))

With guidance from the Federal Student Aid Handbook (FSAH), FH reserves the right to review all information presented by the applicant to the college, including, but not limited to, scholarship applications, admissions applications, FAFSA information, supporting documents, National Student Loan Data System (NSLDS), and verbal or written statements, regardless of whether the student was selected for verification or whether the information was requested by the FAO. In the event of conflicting information, additional information may be required by staff. This could be as simple as a written statement or answers to specific questions all the way up to selection for FH verification of the file. All resolutions must be made to the satisfaction of the FAO staff before financial aid funds are disbursed. Corrections made to the FAFSA by the student or family will not be accepted if conflicting information continues to exist.

Additionally, the FH FAO resolves all Comment Codes (C-codes) that require resolutions, as determined by the DOE. Once again, the necessary steps are taken whether or not the student was selected for verification. In the case of conflicting information with other sources of data at FH, the FAO will work with the other area(s) overseeing that source data to determine who holds the most accurate data to resolve the conflict.

A reporting of zero or low income is not conflicting information in and of itself, however in many cases we may ask for clarification on how expenses were covered by the family with zero or low income. In some cases when a student's independency relies on the reporting that 50% or greater support is provided to a dependent other than a spouse, a reporting of zero or very low income may require follow-up to confirm independency. To keep in line with the DOE's intent, we try to not ask for anything that is not federally required, hence only the need for a minimally intrusive form with basic revenue and expense questions when income is low for the reported family size.

#### **Consortium Agreement**

FH and De Anza College (DA) make an annual decision whether to participate in a consortium agreement with each other. That decision will be based on what policies and procedures will support student retention and persistence while maintaining a primary relationship with one college for purposes of obtaining a degree, certificate, or successful transfer to a four-year institution from the home institution. FH currently chooses not to be the Home institution for a consortium contract with other schools outside the District\*. However, FH does periodically enter in consortium contracts with other schools, outside of the District, as the Host institution. See the FH FAO for details on what programs are covered under any relevant consortium contract(s).

\*See Online Educational Initiative (OEI) section below for exceptions.

## **Copyright Infringement**

For information on Foothill College policies related to copyright infringement.

Foothill College: <a href="http://www.foothill.edu/fga/copyright">http://www.foothill.edu/fga/copyright</a>

# **Cost of Attendance (COA)**

A District Cost of Attendance (COA) is developed annually following federal guidelines, state data, and Board policies. Costs are developed for students living in a no or very low cost housing situation with no dependents and a second category for all others. There are no on-campus living opportunities at FH. Costs are estimated averages and generally are not individual expenses. Expenses for basic computer software & hardware are included.

Dependent care expenses and disability-related expenses may be added to the COA under certain conditions. In addition, costs associated with study abroad or specialized educational programs may increase the COA when actual expenses exceed the average expenses. See the website or visit our office for other examples of when extra costs can be included.

Foothill COA: http://www.foothill.edu/aid/fa\_cost

#### **Data Security**

The FAO takes the security of our data very seriously and actively tries to prevent any unnecessary risk to that information. We feel that this not only best serves our clients, the students, but also is in the best interest of the federal government and our campus as a whole. In an effort to limit said data risk we take the following steps:

All Banner data for the FAO is secured and separated into varying levels of access with a form level designation of query or modify ability based on the general role the employee serves for

the college. Any access to INB is preceded by FERPA training, as mandated by the Admissions and Records Office, and form specific training for the user. The current FAO security classes are:

Finaid A&R Admin
Finaid Front Desk
Finaid EOPS
Finaid Special populations
Finaid Management
Finaid Outside of Financial Aid Office
Finaid Staff

The FAO uses Office 365 One-Drive, which is behind a secure FHDA Portal, to share any information between staff that may contain Personally Identifiable Information (PII). We avoid sending any emails or digital communications that contain PII to any entity without thorough password protection or system authentication/security. After emails between students and the FAO, the vast majority of digital communication occurs between the FAO and the Department of Education (DOE). This occurs through a District secured Remote Desktop access point and then through a double authentication process with the DOE gateways prior to accessing any of the data and ability to transmit.

The FAO secures it's physical paperwork in large lockable cabinets each night, that reside beyond the front desk and are in a shared building that gets locked when not in use as well. Additionally, we secure any checks, cash, money orders, etc. that temporarily reside with us in a safe that is always locked when not actively in use and located in a nonvisible area within the FAO. Finally, staff have small lockable file cabinets and overhead areas where other actively used documents may be secured.

#### **Deadlines for financial aid**

While there are currently no priority deadlines for filing a FAFSA or turning in paperwork to the FH FAO, as both are handled first come, first serve, there are other important deadlines for students to be aware of. Moving forward from the July 1<sup>st</sup> start date of each AY, the following are the most critical and common FH FAO deadlines.

- September 2<sup>nd</sup> is the Community College Cal Grant Competitive app. deadline
- Mid-February is the major scholarship deadline, smaller deadlines also exist.
- March 2<sup>nd</sup> is the entitlement Cal Grant deadline for the subsequent year.
- Early June is the deadline to be awarded Direct Loans for the concluding AY.
- Late June is the deadline to have all Direct Loan steps completed by the student for concluding AY.
- Last day of spring quarter is deadline to draw down final valid Expected Family Contribution (EFC) ISIR records for concluding AY.\*
  - \*ISIRs with valid EFCs on that final day are eligible for further corrections in order to completed the file and award Pell funds.
- September 23<sup>rd</sup> is deadline to turn in Verification docs
- Last Monday in September is deadline for final disbursement for the past AY.

#### **Disabled Student Services**

For more information on the Disability Resource Center (DRC), that offers a variety of programs and services, please visit the following website.

Foothill College DRC: <a href="http://www.foothill.edu/drc/">http://www.foothill.edu/drc/</a>

#### **Disbursement of Funds**

Financial aid funds are disbursed to the student's account on a semi-quarterly, quarterly, or annual schedule. As most aid funds are used by students to pay expenses off campus, disbursement schedules have been designed to help a student budget from quarter to quarter. This general timeline is contingent on the student's file being completed and awarded at the start of the term.

Quarterly: Cal Grant B & C (Tuesday after census date of quarter)

CARE Grant (upon receipt of recipients from CARE prog.) Emergency Loans<sup>1</sup> (fall, winter, & spring prior to finals)<sup>2</sup>

Federal SEOG (mid-quarter)

EOPS Grant (upon receipt of recipients from EOPS prog.)

Federal Direct Loans (beginning of quarter)

Full-Time Student Success Grant (census date of quarter)<sup>2</sup> Scholarships (beginning or mid-quarter in many cases)

Semi-quarterly: Federal Pell Grant (beginning and mid-quarter)

Annually: Samaduroff Contingency Fund (Foothill College)

Scholarships (one-time payment awards)

After disbursement to the student's District account, appropriate charges are deducted, a refund is paid through BankMobile (formerly Higher One Bank). Students have a choice of having funds sent through direct deposit (ACH) to a personal bank account or opening a BankMobile Vibe bank account<sup>3</sup>. Regular refund dates are posted on the FAO website.

In some cases a student presents a picture that casts doubt on their intent at college and appropriate use of their financial aid funds. While this should be the relatively rare case, it does occur and we may take steps to delay disbursement until proof of class participation can be provided. While it is not exclusive to on-line learning, this is predominately the type of course that allows students to obtain funds they otherwise should not have received due to lack of intent to use their aid to pass classes. If this does occur a note will be included with the student's Banner information and the student will be notified of what is required to get their funds released.

The FH information system, Banner, is designed both by base code and campus specific parameters/rules to not allow disbursement of funds if a file has not been marked as

completed by the FAO. This includes all files, whether verified or not, and in most cases will not allow packaging of Title IV funds without a complete flag. This is also true of unresolved C-Codes, verified files that have not been marked as verified, or other fund specific criteria that would normally prevent packaging or disbursements. Packaging of funds are often also subject to both hardcoded Banner logic and FH FAO rules constructed to enforce either DOE or campus specific fund management.

Foothill College Disbursements: http://www.foothill.edu/aid/fa\_disbursements.php

# **Diversity**

Information about the student body's diversity is on the District's Research website at <a href="http://research.fhda.edu/factbook/">http://research.fhda.edu/factbook/</a>

# **Drug-Free Workplace**

The FH Health Services Office directs the compliance with a Drug-Free Workplace. More information is available for FH by visiting the Health Services Office in the Campus Center, Room 2126 or on the Health Services website at <a href="http://www.foothill.edu/health/">http://www.foothill.edu/health/</a>

#### **Eligibility**

Eligibility requirements for federal aid are on the FAO website. Foothill Eligibility <a href="http://www.foothill.edu/aid/fa\_eligibility">http://www.foothill.edu/aid/fa\_eligibility</a>

# **Eligible Programs**

Federal regulations mandate that eligible Title IV recipients must be regular students in an eligible program. Applicants indicate their academic goal on the admissions application and can update it through their MyPortal account or with the A&R Office. Applicants indicating a goal of AA/AS or a goal of transfer to a four-year university are deemed to be in an eligible program so long as the matriculation and enrollment patterns support that goal. While we do not perform a quarter to quarter monitoring of a student's course taking pattern, we may in some cases track and follow-up with students on this.

Many Certificates of Achievement are also eligible as indicated by DOE approval on FH's Program Participation Agreement, so long as the matriculation and enrollment

Foothill College students eligible for the ASFC Emergency Loan will have a paper check issued to them from Student Accounts, most often within 48 hours of application approval.

<sup>2.</sup> Full-Time Student Success Grant (FFTSG) corresponds with a full-time Cal Grant payment and often occur at the same time or shortly after Cal Grant payment.

<sup>3.</sup> Refund via check option was phased out in 17-18, but continuing students were grandfathered in.

patterns support that goal. We submit for approval all Certificates of Achievement that are approved by the State to be offered and are comprised of 27 or more quarter units. See FAO if there are questions about certificate eligibility.

Applicants indicating any other objective not approved by the DOE will be determined not to be in an eligible certificate, degree, or program and therefore ineligible for Federal Title IV aid at FH.

Foothill Academic Programs <a href="http://www.foothill.edu/programs/">http://www.foothill.edu/programs/</a>

#### Family Educational Rights and Privacy Act (FERPA) - FAO

Academic information related to admissions, enrollment, grades and the like are protected under the Federal Educational Rights and Privacy Act (FERPA) by A&R. Inquiries made anywhere on campus related to academic information contained on the admissions application or the academic transcript should be directed to A&R. (34 CFR 99.3)

The FAO adopts the following policies and procedures regarding release of financial aid information, including scholarships, in relation to FERPA.

Much of the information disseminated in the FAO is general in nature and would be made readily available in printed material, in person, over the telephone, via email, on the internet, etc. No identification or consent is required to obtain general information. General information about financial aid and student employment includes eligibility criteria, deadlines, policies and procedures, cost of attendance, satisfactory progress, scholarship selection criteria, awarding priorities, and other related topics.

In general, financial aid records pertaining to an individual student are confidential. Requests for information regarding financial aid confidential information are honored automatically by individuals and agencies<sup>4</sup> who have legal access to those records *without* consent of the student.

Third party individuals or agencies who do *not* have legal access to individual student financial aid records *without* consent will be required to get information directly from the student, either personally or by requesting the student print some verification from the FH portal. Third party individuals include, but are not limited to, parents of college students, spouses, siblings, friends, and betrothed. Third party agencies include, but are not limited to landlords, creditors, and potential employers. To provide written consent for a third party to inspect the student's records the FH FAO requires a college specific form to be completed and signed. See FAO for the FERPA Release form or for further details.

Students (and former students) have a right to inspect their own financial aid records following policies outlined in the FH college catalog.

Students must identify themselves to access their own financial aid information. In person, valid photo identification is required. Valid photo identification includes, but is not limited to, a valid college identification card with photo, a valid driver's license, a valid DMV identification card, or a valid passport. Over the telephone, staff may verify identification through various types of personally identifiable information, above and beyond knowledge of the campus wide student id (CWID) or social security number.

Parent(s) of federally "dependent" students provide essential information to the student's financial aid application and are part of the same FAFSA and would not need written consent to access the relevant *parent* information on the student's FAFSA. Spouses of federally "independent" students are part of the same FAFSA and would not need written consent to access their own relevant income information.

In times of perceived emergency we may make a good faith decision to release certain information to others that would normally act to resolve the emergency.

FERPA policies regarding student employment and personnel records are maintained at the District Human Resources Office.

- 4. A complete list of agencies or individuals to whom an institution may release personally identifiable information from an Educational Record of a student without consent is available in the Family Educational Rights and Privacy Act statute, (Public Law 93-380 s438). The Board of the FHDA Community College District has adopted policies providing access to student records to:
- 1) Officials and employees of the FHDA District; provided that any such person has a legitimate educational reason for inspecting a record.
- 2) Federal and state officials so authorized.
- 3) Officials of other public or private schools where the student seeks or intends to enroll.
- 4) Agencies or organizations in connection with a student's application for, or receipt of financial aid; provided that information permitting the personal identification of students may be disclosed only as necessary for purposes relating directly to that aid.
- 5) Accrediting organizations in order to carry out their accrediting functions.
- Organizations conducting studies for, or on behalf of, educational agencies or institutions for purposes allowed in Title 5 and so long as that information that allows personal identification of a student is kept confidential and destroyed when no longer needed.
- 7) Appropriate person in connection with an emergency if the information is necessary to protect the health or safety of the student or other persons.

#### Financial Aid Awarding and Packaging Policy (including PCA & MMS)

The FH FAO packaging policy is to initially make awards based on anticipated full-time (FT) enrollment after an official EFC is available and any file review has been completed and exercises our regulatory right to make an initial payment of Federal Pell Grant only after these criteria have been met. Awards initially displaying on the student's MyPortal account are FT amounts, but changes may be made as the year progresses and enrollment changes. If students drop units, some funds may be automatically backed out of their student account to properly adjust for their actual eligibility. Students accepting a loan will be asked to accept and complete the Direct Loan process online. Students wishing to accept Federal Work-Study (FWS) will be instructed to follow specific instructions regarding placement and paperwork at that time.

With the implementation of the Banner information system, awarding is done by packaging groups with certain predetermined funds and amounts assigned with the attempt to best fill the unmet need of the majority of students. The most commonly used groups are for students in all four quarters of the AY (F4PACK) and those in the fall, winter, & spring quarters (FHPACK), although other groups do exist. The unmet need by which the FAO packages is determined by the COA, minus the EFC, minus previously awarded funds for the AY. In most cases of financial aid awarding, the FAO is not allowed to exceed the unmet need. There may be exceptions regarding entitlement funds. In addition to federal regulations this guides our overall awarding practices at FH.

'Offered' awards made to students who do not respond positively within the period when funds are available, may have awards expired or cancelled so that they can be provided to someone else. Additionally, FWS students may also lose funding for their award if they do not follow the job placement procedures accurately and in a timely fashion. Revised award offers supersede previous ones.

The Primary Care Associate Program (PCA) program is a joint venture between FH and Stanford University. Students are accepted to the Stanford program but processed through FH for purposes of enrollment fee assessment and financial aid. Due to the unique needs of students in this program, they are not packed with FWS.

The Masters of Medical Science (MMS) program is a joint venture between Stanford and Saint Francis University (SFU) that is a continuation for many PCA students. The annual consortium agreement between FH and SFU requires that the FH FAO treat students entering the MMS program as SFU students for all aid purposes, except for the state BOGFW and in some cases scholarships. Once identified, any awards that had been made to these students for the time period when they are enrolled in the MMS program will be cancelled and repayment required if already disbursed. This includes the certification of alternative loans. This is to the benefit of the students since they would be eligible for graduate level loan limits instead of the undergraduate levels that FH is bound to. FH actively works with Stanford to identify these students as early in the process as possible, but also relies on students to proactively notify our office when they intend to begin enrollment in the MMS program.

For more information on the packaging strategies of the FAO please contact the office.

#### **Financial Aid Programs**

By submitting a completed FAFSA and any related supporting documents, a student will receive consideration for the following financial aid programs:

- 1. CA Board of Governor's Fee Waiver (BOGFW)
- 2. Federal Pell Grant
- 3. Federal Supplemental Educational Opportunity Grant (SEOG)
- 4. Federal Work-Study (FWS)

- 5. Federal Direct Loans
- 6. Cal Grants B & C (with additional designation by CSAC)
- 7. Full Time Student Success Grant
- 8. Federal Parent Loans for Undergraduate Students (by parental request)

Scholarships are additionally advertised district-wide at http://www.foothill.edu/aid/campusscholarships.php

For more details on specific programs, visit the FAO website.

Foothill Financial Aid Programs <a href="http://www.foothill.edu/aid/fa\_programs">http://www.foothill.edu/aid/fa\_programs</a>

#### **Foster Youth**

It is the mission of the FH FAO to support all our students in the best ways possible to allow for equitable opportunities to be academically successful with the help of financial aid. However, we also recognize some student populations come to us with other obstacles or needs that may require enhanced levels of assistance or focus. Our FH foster youth (FY) population is one of those that we pay special attention to.

In the FAO we all are able and willing to help our current and former FY, but we also try to assign a single employee to be the point of contact in our office for the FY. This person will help with file questions, other forms of FY specific aid, and referral or collaborative work with other departments to assist the FY student with campus-wide contacts. At the time of this writing, FH was continuing to establish and enhance the level of services from a campus FY contact in the Student Resource Center (SRC). This is including, but not limited to, a centralized email and phone number for our students to make that critical first contact.

#### **Freeze Date**

The freeze date is the point during each primary quarter when we expect there will be no additional adjustments to a student's unit load for the quarter. The FH FAO has this date set around the 50% point of each primary quarter. On the freeze date, units a student is actively enrolled in is what they will be paid for at the second disbursement. System generated credits and debits of their financial aid may occur up until that point. Students finishing their file after the freeze date will be paid based on their units at the time of file completion. While this date is not published, it is available through the FAO.

# Gift policy

While FH appreciates our appreciative students, we also do not want to put students in a position of feeling that gifts are an acceptable or necessary practice in our FAO. Additionally, we do not want our students to spend either their hard earned money or their financial aid on gifts for the staff or FAO. Finally, we do not want the

perception, albeit not true, that a gift could alter the review process or the outcome of the financial aid process.

With this in mind we also do not want to insult students when they just try to show appreciation. It is the FH FAO's policy for staff to not accept monetary gifts, including gift cards, from students. If a de Minimis amount has been provided as a gift and the student cannot be convinced to take it back, it will be applied to benefit the entire office, not just the individual who accepts it. In the case where a gift is not monetary in nature, it will be given/donated to an appropriate alternative to an individual employee, based on the best judgment of the Director of Financial Aid or their management.

#### **Immunizations**

Policies related to immunizations and vaccinations are on the Health Services website. Foothill College <a href="http://www.foothill.edu/health/immune">http://www.foothill.edu/health/immune</a>

## **Marital Status Changes**

On a case-by-case basis the Director of Financial Aid, their designee, or superior, may make the determination that the marital status of an applicant does not accurately represent their current circumstances either due to dependency status changes or for more accurate representation of household size and number in college. In those cases an update to the marital status and corresponding data elements *may* be made to more accurately represent the aid applicant. These corrections will only be accepted when performed by FH. Please contact the FAO for more information on this possibility.

#### **Net Price Calculator**

The Net Price Calculator (NPC) is designed to allow our consumers (future and current students and their families) to better understand the net price of an education at our institution. FH has provided a NPC as of the required date of October, 2011 when data became available through the CA Chancellor's Office. The NPC may be updated on an annual basis as more current CA Chancellor's Office data becomes available. Please refer to the college website to use the NPC.

Foothill College <a href="http://www.foothill.edu/aid/fa\_resource">http://www.foothill.edu/aid/fa\_resource</a>

#### **Office Contact Information**

Financial aid contact information to assist prospective and enrolled students is available on the FAO website.

Foothill Contact Information: http://www.foothill.edu/aid/fa contact

# Office of Inspector General (OIG) U.S. Department of Education (34 CFR 668.16(g))

The OIG is an investigatory agency that conducts "independent and objective audits, investigations, inspections, and other activities" related to the U.S. Department of Education's programs and operations. When necessary, the OIG is contacted to inspect possible issues of malfeasance within FAOs and the programs they administer. If a situation is detected that appears suspicious, the OIG will be contacted by the Director of Financial Aid, their designee, or a superior at the campus. From that point all relevant information is given to the OIG agent(s) and they determine what any necessary next steps would be. Issues that are reported to the OIG are along the lines of an intent to obtain aid through deception or criminal conduct, not because of accidental mistakes.

When necessary, the persons involved in the alleged offense(s) will also be reported to the appropriate administrator for discipline and/or campus police and District Human Resources for further investigation and disciplinary proceedings.

#### **OEI**

The Online Education Initiative (OEI) is a special consortium of California Community Colleges that have partnered in an attempt to offer more inclusive online education opportunities for students. The OEI allows students to be earning a degree or certificate from one college in the OEI Consortium and taking online class(es) at another that would apply back towards their Home College major. This consortium has special rules and Memoranda of Understandings (MOUs) associated with it that govern how the process works and which college (Home or Teaching College) take what responsibilities.

In general the rules around financial aid follow the FSA Handbook on consortium contracts between eligible Title IV institutions with minor OEI specific variations spelled out in the OEI Consortium contract for the FAOs. See FAO for further details or alternative guiding MOUs, policy, and procedures.

#### Professional Judgment Dependency Overrides (HEA Section 480(d))

As provided for by the DOE, the Director of Financial Aid can use their professional judgment in making dependency overrides on a case-by-case basis for students in unusual circumstances. A dependency override is a means of making a normally dependent student, independent based on specific and documented unusual circumstances in that person's life. A Request for Dependency Review form along with supporting documents, the Director's determination, and any notes will be placed in the student file. Unusual circumstances include, but are not limited to, compelling cases where it is unhealthy or impossible to obtain parental information. The following, by themselves, do <u>not</u> qualify as unusual circumstances:

- Parents refuse to assist student with educational expenses
- Parents refuse to provide information to complete a FAFSA
- Parents refuse to provide information to complete the verification process

- Parents do not claim the student as a Federal/State tax exemption
- Student has shown total self-sufficiency, but has not legally emancipated
- Student lives with and/or is supported by family members other than the parents

Any student who had a dependency override approved must repeat the paperwork or give relevant updates whenever switching from another school to FH or when a new AY has begun. This allows for a thorough review each time to make an accurate and current assessment of the student's needs. All override decisions made by the Financial Aid Director are final.

#### Professional Judgment Data Elements (HEA Sec. 479A(a))

Not all students who apply for financial assistance will qualify, nor will every student who receives an award offer be satisfied. Occasionally new information may cause an increase in the award offer or need to be accounted for to accurately represent the student/parent's financial situation. Values of data elements or COA components *may* be revised at the discretion of the Financial Aid Director when a special condition exists that would make prior information inaccurately reflect an ability to contribute to educational expenses. Generally, this can occur with loss of employment for an extended time, death, disability, natural disasters and the like. This option may also be used in cases when the COA does not correctly represent the costs that a particular student is experiencing. To obtain increases in their awards, students may request a professional judgment be made to explain and document their or their parents' special circumstances.

FH will collect requested information from the student/parent and make an individual decision as to whether new data should replace <u>verified</u> FAFSA data to better reflect the student/family's financial strength for computing an EFC. Students are entitled to an explanation of the results, if requested. The decision of the Director of Financial Aid is final, as it is voluntary act of the Director.

#### **Return of Title IV Funds**

Under guidance from the FSAH, FH uses available technology to identify aid recipients who have completely withdrawn from all units before 60% of the term has passed or who receive all non-passing grades because of course inactivity and calculates amounts earned and unearned for purposes of post-withdrawal disbursements or return calculations. General refund policies are posted on the Cashier's Office website.

Foothill Refund Policies <a href="http://www.foothill.edu/reg/fees">http://www.foothill.edu/reg/fees</a>

#### Satisfactory Academic Progress (SAP) (HEA Section 668.34)

The DOE and Student Financial Assistance (FSA) Programs requires colleges to develop and apply consistent standards of Satisfactory Academic Progress (SAP) in

determining student eligibility. This complete policy is posted on FH's FAO website, listed below. The SAP policy is established to apply standards to students applying for or receiving financial aid at FH or DA. Additionally, by applying for and receiving financial aid from FH or DA, the student is expected to have read the SAP policy and demonstrated the ability to succeed by meeting the SAP requirements.

At the time a student applies for Title IV aid, the SAP policy applies to all their quarters in the District, regardless if they had applied for or received financial aid in the past, per the FSAH. Enrollment and academic records are used in determining a student's SAP and in monitoring their SAP progress. While faculty are mandated to drop students prior to census who are not actively engaged in the course or who have not attended, this may not always happen. In the case of a student receiving all non-passing grades ('F', 'W', or 'NP' grades) the FH FAO treats them as unearned grades for the purposes of SAP, unless evidence of academic activities can be provided or an A&R adjustment later removes the grade from the transcript due to error.

Students who transfer to the District from another college will be monitored by the qualitative SAP standards from their first quarter forward. In some cases students transferring in may be initially placed in a warning or disqualified SAP status based on prior college completion or GPA information, until a quarter of successful SAP has been demonstrated at the District. The student who transfers in will also be monitored by the quantitative standards and will have prior evaluated units included in the assessment. Units completed at FH or completed units evaluated towards a FH major are also used to determine 1<sup>st</sup>/2<sup>nd</sup> year educational standing for financial aid purposes.

In order to receive financial aid, which may include all Federal, State, and campus-based aid (excluding the BOGFW, some EOPS/CARE benefits, and some scholarships) and to continue receiving aid, the FAO requires that the students meet and continue to maintain SAP. Beginning with the 10-11 AY the SAP qualitative and quantitative standards will be assessed on a quarterly basis for all units taken in the District.

See website for specific SAP requirements, appeal options, and/or examples.

Foothill SAP Policies http://www.foothill.edu/aid/fa\_progress

#### **Scholarships**

Scholarships are advertised online with all relevant criteria and deadlines at <a href="http://www.foothill.edu/aid/campusscholarships.php">http://www.foothill.edu/aid/campusscholarships.php</a>. In most cases a review subcommittee will read applications and recommend top candidates to a final selection committee. In some cases the scholarship review process is outsourced to more uniquely comprised review committees. Receipt of a scholarship is packaged with other aid and occasionally requires alterations to previous awards to prevent exceeding the COA.

## **Security Report**

The security report is available online at: <a href="http://www.foothill.edu/services/studentright1">http://www.foothill.edu/services/studentright1</a>.

# Student Responsibilities, Financial Aid

Financial aid students are responsible to:

- 1. Complete all application forms accurately and submit them on time.
- 2. Provide correct and consistent information.
- 3. Return all additional documentation, verification and/or new information requested by the FAO.
- 4. Read, understand, and ask questions, if necessary, about forms that are signed and for keeping copies of those forms.
- 5. Accept responsibility for all signed agreements.
- 6. Maintain satisfactory academic progress (SAP) prior to and while receiving financial aid.
- 7. Repay any financial aid based on incorrect information for which the student was not entitled. Pay any associated fines and fees. If the student purposely gives false or misleading information, the Director of Financial Aid may refer the applicant to the appropriate Administrator for consideration for campus discipline, and/or may report the student as possible fraud on NSLDS, and/or may report the student to the OIG.

#### **Student Rights, Financial Aid**

Financial aid students have the right to know:

- 1. What financial aid programs are available at FH.
- 2. Any deadlines or priority dates for submitting applications for each of the financial aid programs available.
- 3. How financial need was determined.
- 4. What resources were considered in the calculation of need.
- 5. How much of the financial need, as determined by FH FAO has been met.
- 6. How financial aid will be distributed, how decisions on those distributions are made, and the basis for these decisions.
- 7. The school's refund policy.
- 8. What portion of the financial aid received must be repaid.
- 9. How the school determines SAP and what happens if it is not being met.

#### **Student Right-to-Know**

More information on FH right-to-know is available on the following website.

Foothill College http://www.foothill.edu/services/studentright1

#### **Textbook Information**

Information on textbooks required for each course is available in the Bookstore and also on the green sheet given to each enrolled student on the first day of class.

Foothill Bookstore <a href="http://books.foothill.edu/home.aspx">http://books.foothill.edu/home.aspx</a>

#### **Transferring, Inter-District**

Due to the complex manner in which the District chose to implement the Banner Information System there are special steps that must occur to transfer a financial aid file from one college to the other in our District. If no payments have been made in the AY, it may be as simple as listing the other college on one's FAFSA and updating the educational goal with A&R to correctly display the educational goal at the correct college. Then students work with the second college to complete their file.

If any type of payment has occurred in that AY the steps are more involved. The first two steps of listing the other school on the FAFSA and updating the educational goal with A&R are the same. Then the first college must complete any scheduled payments, R2T4, FWS assignments, etc. Then the first college changes the student to a transfer aid period and packaging group in order to then package funds for the second college. The initial college keeps all paperwork for audit purposes and pays the funds from the second college.

#### **Verification Policies and Procedures (CFR 668.53)**

Within the guidelines in the FSAH, FH verifies 100% of all applicants selected for verification by federal edit. FH also reserves the right to select any applicants for verification where discrepancies, conflicting information, suspected fraud, or where a professional override exists. The FH FAO uses several District or college specific forms in addition to student provided proof to verify the required data elements based on federally selected verification groups or based on FH selected data elements for campus selected verification. Unless otherwise required to package and disburse aid by the FSAH, FH chooses not to disburse any Title IV aid prior to verification completion.

All information submitted as part of the application and verification process must be accurate or within the tolerance levels established by regulation, or a correction may be required. For tax filers who have been granted an extension and had their file completed and packaged based on that extension information, we may later require the actual tax transcript to confirm tax information and reverify. Additionally, a student/family that indicates a 'Will File' answer will be asked to correct/update that information prior to awarding, excluding those who have shown proof of a filing extension. In cases of discrepancies, awards will be held and/or adjusted.

The FH FAO has chosen to use the ISIR code '02' for 'use of the IRS Data Retrieval Tool' to waive the tax transcript requirement for anyone who uses that feature. We may also waive Household Size verification following FSAH guidance. In general, the FH FAO has chosen to only verify the required federal elements for any given student verification group, regardless of reported income and asset levels, barring conflicting information. In rare occasions, some files will have additional information requirements based on previously mentioned uncertainty by the FAO.

The deadline for submitting documentation for the 2017-18 Award Year will be on or around August 17<sup>th</sup> for students seeking their Pell grant. For those who would like to apply for student loans, they must submit their documentation on or around June 9<sup>th</sup>, barring a unique circumstance supported by the file reviewer.\*

\*Final dates to be determined closer to end of AY

FH exercises our regulatory right to require additional information or evidence in cases where suspicion exists or discrepancies are not resolved to the satisfaction of the Financial Aid Director. The college also reserves the right to take appropriate action in cases where fraud is suspected. Suspected fraud may exist if any of the following conditions exist, including, but not limited to:

- 1. Forged or falsified documents
- 2. False or fictitious names or social security numbers
- 3. Use of multiple social security numbers
- 4. Unreported previous loans or grants
- 5. Misrepresenting prior educational history
- 6. Habitual reporting of inconsistent data
- 7. Misrepresentation of eligible program as evidenced by a preponderance of courses taken that are not required for the academic program.

#### **Voter Registration**

Voter registration materials are available in the FH FAO, on the MyPortal 'Student' tab, and via the FH FAO webpage.

Foothill College <a href="http://www.foothill.edu/aid/fa\_resource">http://www.foothill.edu/aid/fa\_resource</a>