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The financial aid policies and procedures manual has been developed to serve as a guide for the staff. With continuously changing Title IV financial regulations, all colleges must keep administration of Title IV programs in compliance with the regulations and keep the financial aid policy and procedures manual up to date. It is expected that if the staff follows this policy and procedures manual, they should be able to properly administer the Title IV programs without having major financial aid liability for the college. The financial aid staff is expected to administer all financial aid programs within the regulations that govern them.

The Lac Courte Oreilles Ojibwe College (LCOOC) philosophy of student financial aid takes into consideration that the majority of the students attending LCOOC are first generation college students. They may come to LCOOC both economically and educationally disadvantaged.

Although most of the financial aid programs are on an as needed basis, the financial aid staff makes every effort to provide funding for all students that have a demonstrated financial need. Even after funding to the limit of funds available, many students still have a high unmet need. LCOOC will not turn away any properly admitted student because the student lacks the financial resource to attend the college.

**MISSION STATEMENT**

The Lac Courte Oreilles Ojibwe College mission is to provide Anishinaabe communities with a system of post-secondary and continuing education while advancing the language, culture, and history of the Ojibwa.

**ACCREDITATION**

The North Central Association of Colleges and Schools Commission on Institutions of Higher Education awarded candidacy for accreditation to LCOOC for the Associate’s degree. (North Central Association, Commission on Institutions of Higher Education, 30 LaSalle Street, Suite 2400, Chicago, IL 60602, phone (800) 621-7440 / (312) 263-7462. LCOOC is currently under Probationary Status with the HLC.

**MEMBERSHIPS**

LCOOC is a member in probationary standing with the American Indian Higher Education Consortium (AIHEC). The Bureau of Indian Affairs under the Tribally Controlled Community College Assistance Act has also accepted LCOOC as a Tribally Controlled College. (P.L. 95-471).

**LAND GRANT STATUS**

The University of Wisconsin-Madison, Lac Courte Oreilles Ojibwe College in Hayward, and the College of the Menominee Nation are the state of Wisconsin’s three Land Grant Institutions. The bill granting the nation’s twenty-nine Tribal Colleges Land Grant status was passed in 1994. The
first Morrill Act of 1862 authorized each state to receive a parcel of land for their respective land-grant colleges. The land was to be used to support programs in agriculture and the mechanical arts. In 1890, Congress passed the second Morrill Act establishing 17 institutions that provided agricultural training to African-Americans. Since 1960, because land is no longer largely available, nearly every institution entering the nation’s Land-Grant system has received an endowment in lieu of land.

Congress has since extended land grant program funds to colleges in Guam, the Virgin Islands, and other trust territories as well as to Hispanic colleges in the United States. Twenty-nine U.S. Tribal colleges, including LCOOC, were named Land-Grant Institutions in September 1994. The bill granting Land Grant status to the nation’s Tribal Colleges authorized Congress to appropriate $4.6 million annually from 1996 through 2000 to establish an endowment fund which will be used for their support. It also authorized funds for extension services and competitive grants from the U.S. Department of Agriculture. Because of their Land Grant designation, the Tribal College programs of outreach and technical assistance to rural populations, for which the original Land-Grant Institutions were founded, will be strengthened.

THE CAMPUS
The LCOOC campus is located near Hayward Wisconsin. It is within the boundaries of the Lac Courte Oreilles Ojibwe reservation and serves three outreach sites at the city of Washburn, Lac du Flambeau reservation, and the St. Croix reservation.

STATEMENT OF PURPOSE FOR STUDENT FINANCIAL AID
LCOOC and outreach sites are located on remote reservations that historically have had a population that is economically deprived and where the unemployment rate is extremely high. Although the dollar amount for student financial assistance has steadily increased over the years, it is still a struggle to meet the total amount of our students’ cost of education needs.

USE AND SCOPE OF THIS POLICY AND PROCEDURES MANUAL
The scope of this policy manual is to serve as a guide for the management of all Title IV programs along with other types of financial aid administered by the financial aid office. Each financial aid staff member will have a copy of this manual and will be responsible for learning to properly apply the stated policies and procedures. This manual will also serve as a training guide for new staff members.

LAC COURTE OREILLES OJIBWE COLLEGE
PROGRAM ELIGIBILITY
LCOOC has been a participant in the Federal Title IV financial programs since 1988. The current program certification documents are on file in the financial aid office.
2020-2021 Academic Calendar

FALL SEMESTER 2020
Registration ends August 28
Classes begin August 31
1A-Classes begin August 31
Labor Day (No Classes) September 7
Last day to add classes w/faculty approval September 8
1A-Last day to add/drop classes September 8
Last day to drop classes September 14
Census Date September 15
Constitution Day September 17
1A-Midterm grades due September 28
Indigenous Peoples Day (No Classes) October 12
1A-Last day to withdraw October 13
1A-Last day of classes October 24
1A-Final grades due October 26
1B-Classes begin October 26
Midterm grades due October 26
Registration for Spring begins October 26
1B-Last day to add/drop classes November 2
Veterans Day (No Classes) November 11
Last day to withdraw November 20
1B-Midterm grades due November 23
Employee Appreciation Day (No Classes) November 25
Thanksgiving (No Classes) November 26-27
Last day of classes December 18
1B-Last day of classes December 19
Final grades due December 21

SPRING SEMESTER 2021
Registration ends January 15
Martin Luther King Day (No Classes) January 18
Classes begin January 19
2A-Classes begin January 19
Treaty Day (No Classes) January 22
2A-Last day to add/drop classes January 26
Last day to add classes w/faculty approval January 26
Last day to drop classes February 2
Census Date February 3
2A-Midterm grades due February 15
American Birkebeiner Friday (No Classes) February 19
2A-Last day to withdraw March 1
### 2A-Last day of classes
March 13

### 2A-Final grades due
March 15

Midterm grades due
March 15

Spring Break (No Classes)
March 15-19

Registration Fall/Summer begins
March 22

Classes resume
March 22

#### 2B-First day of classes
March 22

#### 2B-Last day to add/drop classes
March 29

Easter Break (No Classes)
April 2 -5

Classes resume
April 6

Last day to withdraw
April 16

#### 2B-Midterm grades due
April 19

#### 2B-Last day to withdraw
May 3

Last day of classes
May 14

#### 2B-Last day of classes
May 15

Final grades due
May 17

#### 2B-Final grades due
May 17

Commencement (Tentative)
May 22

### SUMMER 2020

<table>
<thead>
<tr>
<th>Event</th>
<th>Date</th>
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<tr>
<td>Registration ends</td>
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<tr>
<td>Classes begin</td>
<td>June 1</td>
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<tr>
<td>Last day to add/drop classes</td>
<td>June 8</td>
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<td>Last day of classes</td>
<td>July 24</td>
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<tr>
<td>Final grades due</td>
<td>July 27</td>
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### SAMPLE FORMS AND MATERIALS USED BY SCHOOL

Forms and materials are located in Appendix B. Handbooks and catalogs can be found online at [www.lco.edu](http://www.lco.edu).

1. Academic Forgiveness Financial Aid Statement
2. Add/Drop Form
3. Admission Checklist
4. Appeals Result Letter
5. Application for Federal Work Study
6. Award Letter
7. Change of Income Application  
8. Change in Cost of Education  
9. Consortium Agreement  
10. Contract for Academic Success  
11. Elder’s Discount Waiver  
12. Federal Work Study Contract  
13. Financial Aid File Audit  
14. Financial Aid Budget  
15. Financial Aid Pamphlet  
16. Requirements and Guidelines for Emergency Check Release  
17. Repayment Agreement  
18. Reconciliation Worksheet  
19. Registration Form  
20. Request for Status Information Letter  
21. R2T4 Worksheet Calculation  
22. Statement of Understanding Regarding continued financial aid funding after first degree and Pell grant lifetime eligibility  
23. Student Information Consent Form  
24. Suspension letter sent after the semester  
25. Suspension letter for students with enrollment gaps  
26. Textbook Voucher  
27. Verification letter  
28. Verification Worksheets
PART I.1 ADEQUATE PERSONNEL TO ADMINISTER TITLE IV PROGRAMS

This section lists the job duties, staff functions, and communication protocols of offices involved in approving and disbursing Title IV aid. Communication between personnel occurs by email or face to face contact. Also, all-staff and departmental meetings provide opportunities to share information.

1.11 STAFFING

REGISTRATION

Registrar
General Summary: Responsible for initiating and maintaining the permanent academic record of each student and for the registration of all students. Works closely with Academic staff and maintains accurate records of all college courses and curriculum requirements. Coordinates with institutional research and IT staff in compiling statistical data required by governmental agencies.

FINANCIAL AID

Financial Aid Director
General Summary: Responsible for administering all financial aid awarded in accordance with applicable rules and regulations.

Financial Aid Assistant
General Summary: Responsible for clerical support for the Financial Aid Director.

BUSINESS OFFICE

Chief Financial Officer
General Summary: Responsible for financial reporting, internal controls and direction of all business office staff.

Staff Accountant – Accounts Payable
General Summary: Responsible for issuing checks to students’ with credit balances.

Staff Accountant – Payroll and Bank Reconciliation
General Summary: Responsible for posting student transactions in Jenzabar. Reconciliation of G5 transactions with Financial Aid Office and Office of Business Affairs.

Accounts Receivable Accountant/Virtual Bookstore Manager
General Summary: Responsible for student accounts including tuition/fees billing, financial aid distribution refunds, student accounts receivables recording, and monitoring of student account balances. This position is also responsible for collection of delinquent accounts, establishing student payment plans, and all third party billing.
The Bursar assists students with providing an eCampus student account, ordering their textbooks through the LCO Virtual Bookstore, and to help conduct textbook buy backs for each semester. Bursar also communicates with faculty/staff to collaborate the textbook adoption list needed for
eCampus virtual bookstore and to make sure students will be provided the correct supplies and materials needed to be successful in their courses.

Communication between personnel occurs by email or face to face contact. Also, all-staff and departmental meetings provide opportunities to share information.

**OFFICE OF BUSINESS AFFAIRS**

**Office of Sponsored Programs**

General Summary: Manages various grant key holder responsibilities for drawing federal funding through the G5 Fund Facility.

**PROGRAM PARTICIPATION**

**Federal Pell Grant**
The Federal Pell Grant is designed to help needy undergraduate students pay for their educational costs. For many students, the Federal Pell Grant provides a foundation of financial aid to which other forms of federal and non-federal aid may be added. Unlike student loans, the Federal Pell Grant does not have to be paid back if a student completes the award period in which the Federal Pell is awarded. Eligibility for the Federal Pell Grant and the amount of the award is based on educational cost and enrollment status. Students must meet the eligibility requirements and submit a completed FAFSA for Federal Pell Grant consideration.

**Federal Work Study**
A student must meet all the eligibility requirements of the Federal Work Study Program. The student must have a demonstrated unmet need to be eligible for employment.

**Federal Supplemental Education Opportunity Program (FSEOG)**
The FSEOG Program provides need-based grants to help low-income undergraduate students finance the costs of postsecondary education. When making FSEOG awards, LCOOC must give priority to those students with “exceptional need” (those with the lowest Expected Family Contributions, or EFCs) and those who are also Federal Pell Grant recipients. Once the priority students are awarded and funding is still available, LCOOC can award to those students with a higher EFC, and to those who are not Pell eligible.

**Tribal Higher Education Grant; BIA Grant**
The Tribal Higher Education grant is available to Native American students. Students must contact their respective Tribe’s Higher Education Office to obtain their application and eligibility requirements. Most funds are awarded on a first come first served basis. Funds administration is managed in accordance with Department of Education mandates. Ongoing communication with tribal Higher Education Liaisons is maintained.

**Employment Assistance Adult Vocational Training**
A student who is a member of a federally recognized Indian tribe or band may apply for grants-in-aid administered by the Employment Assistance Program within the Bureau of Indian Affairs (BIA). Each student must apply early each year through the Tribe, where he or she is enrolled, or a BIA agency office where he/she is enrolled.
Veterans Benefits
Veterans of active military service should contact their local Veterans Administration Service Office for more information concerning the application process.

Vocational Rehabilitation
The Vocational Rehabilitation Program is intended to assist those students with physical and/or mental disabilities to become active members of the labor market. Students who think they may qualify are encouraged to contact the nearest Vocational Rehabilitation Office.

American Indian College Fund (AICF)
LCOOC administers funds received from the American Indian College Fund. A posting is done each semester outlining the eligibility requirements and deadlines for submission of the application package. The Financial Aid Committee reviews and awards the scholarships and notices are sent to the recipients.

Scholarships
LCOOC Financial Aid Office and Library have information about other higher education funding sources. Scholarship notices received by the Financial Aid Office are sent to students’ college email and posted on the bulletin board in the 200 wing.

State Programs

Minority Grant
This grant is available through the Wisconsin Higher Educational Aids Board and is designed to improve retention and increase graduation opportunities for students that have complete their first year of post-secondary education. Students at LCOOC must have completed at least one year (>24 CH) of their program of study to be eligible for the Minority Grant. Students must show financial need. Students must have maintained SAP and be Wisconsin residents enrolled at least half time. The Minority Grant provides financial assistance to African-American, Hispanic, Native American and Southeast Asian (Cambodian, Laotian and Vietnamese) students. Students are eligible for eight semesters.

Talent Incentive Grant
This program supplements the WG program and is targeted to serve disadvantaged and/or minority students. Eligible students are nominated by staff and faculty within the institution, with recipients determined by the FA committee in February of the Spring semester. The institutional application is then forwarded by the F/A Office. Contact the LCOOC Financial Aid Office for further information or assistance. Students are eligible for ten semesters of continuous enrollment.

Wisconsin Divisions of Vocational Rehabilitation (DVR)
This program serves people who have a disability, which presents a substantial handicap to employment or independent living. You may obtain applications or information by calling the District offices in Hayward (Sawyer County), 715-634-0523, Superior (Douglas County), 715-392-7896, Rice Lake (Barron County), 715-234-6806, and Spooner, 800-387-0315. The direct
line for DVR headquartered in Madison WI is 608-261-0050. More information can be obtained at https://dwd.wisconsin.gov/dvr/.

**Wisconsin Grant (WG)**
The WG amount is based on the student’s financial need. Students must have maintained SAP and be Wisconsin residents enrolled at least half time. Students are awarded on first come, first served basis that is determined by the date one files a FAFSA application. Students are eligible for ten semesters.

**Wisconsin Indian Grant (WIG)**
This grant provides educational opportunities to Native American students who are residents of the State of Wisconsin and have at least ¼ Indian blood quantum of a tribe or who are a member of a federally recognized tribe as determined by the appropriate tribal government recognized by treaty by the United States. Students are eligible for ten semesters of funding. Students must have maintained SAP and be Wisconsin residents enrolled at least half time.

**Ineligibility for state funding**
Students may not be eligible for state funding if they are in arrears on child support or did not meet the residency requirements or don’t have the unmet need.

**Financial Need Analysis**
LCOOC Financial Aid will not complete financial need sections of tribal or state grant applications until each semester census date (beginning of third week of classes) due to the high volume of students adding/dropping courses prior to that date.

**NUMBER OF FINANCIAL AID APPLICATIONS EVALUATED**
Award Year 2019-2020 = 415 applications

**NUMBER OF STUDENTS WHO RECEIVE TITLE IV FUNDS AND AMOUNT**
Award Year 2019-2020 = 212 students (total funded by Pell, FWS, and FSEOG = $760,073)

**TYPE OF FINANCIAL AID DELIVERY SYSTEM**
PowerFAIDS is the software program which is used solely by the financial aid office to manage all aspects of financial aid. PowerFAIDS interacts with Jenzabar® EX which is a comprehensive, fully-scalable administrative platform designed specifically for use in Higher Education. Members of an institution’s ecosystem are connected with a centralized database that can be implemented out-of-the-box and rapidly deployed. Jenzabar EX provides interoperable workflows that adapt as institution policies change and technology evolves.

**OFFICE AUTOMATION USED IN THE ADMINISTRATING TITLE IV AID**
LCOOC has a student records program called PowerFAIDS that manages all aspects of financial aid. The only personnel who have access to this system are the Financial Aid Director and the Financial Aid Assistant. PowerFAIDS interfaces with all other departments through Jenzabar which is an ERP system that was purchased in 2008.
Edconnect is the software program that is used to download student ISIR files from CPS. The file is imported into the PowerFAIDS system. All ISIR’s are downloaded to the student’s file that is located on LCOOC’s hard drive. The student’s file that is located on the ‘S’ Drive help to determine those selected for verification by the Department of Education. Students with questionable or conflicting data will be selected for verification by the Financial Aid Department.

PowerFAIDS is designed to handle all processes of packaging, budget construction, requesting verification documents and file review. Jenzabar transfers SAP determinations into PowerFAIDS, which is coded for determining financial aid eligibility.

Financial aid documents are kept in electronic format on the software programs that are utilized by the Financial Aid office. Audits of these files are completed at least once per year.

The IT department backs up all networked resources on premises from one server to another on a daily basis.

Security measures are put in place to protect private information through the use of passwords and access rights assigned to each employee. For instance, in Jenzabar, each employee is only given access to those areas that are used to accomplish their job duties. PowerFAIDS is only active on two desktops in the financial aid office and protected by system passwords and software passwords.

**PART 1.2 CHECKS AND BALANCES**

**Organizational Structure**

**FINANCIAL AID OFFICE**


Office hours: Monday-Friday, 8:00-4:30. Lunch hours are typically staggered between personnel so assistance is available throughout the day; however, if needed, special accommodations may be necessary. Students may contact the FAO by email, phone or stop by in person. The Financial Aid office maintains an open door policy to the maximum extent possible. Financial Aid staff visit each outreach site at least once per month.

Student Electronic Files: Per federal regulations, record retention for a student’s file is for their current year of enrollment plus the past three years. However, LCOOC has chosen to retain the student’s file for the current year, plus the previous four years. All financial files are kept in the Financial Aid ‘S’ Drive where only financial aid staff is allowed access.

**BUSINESS OFFICE**

The Business Office has employees; CFO and two Staff Accountants.

Office Hours: Monday – Friday, 7:00-4:30. Students may phone, email or stop by the office to speak to personnel about questions or concerns.
Fiscal Records: Paper records must be kept for at least 7 years. The current year plus the previous year’s papers are retained in the Business Office in locked cabinets. The remaining five years are stored in the lower level of the college in the archive room. Once the retention period has passed, all records will be shredded. Electronic records are kept indefinitely and are protected with passwords.

**System of checks and balances**

In addition to having a well-organized Financial Aid Office staffed by qualified personnel, a school must ensure that its administrative procedures for the FSA programs include an adequate system of internal checks and balances. This system, at a minimum, must separate the functions of authorizing payment and disbursing or delivering funds so that no single person or office exercises both functions for any student receiving FSA funds. Small schools are not exempt from this requirement even though they may have limited staff. Individuals working in either authorization or disbursement may perform other functions as well but not both authorization and disbursement. These two functions must be performed by individuals who are not members of the same family and who do not together exercise substantial control over the school. If a school performs any aspect of these functions via computer, no one person may have the ability to change data that affect both authorization and disbursement. While electronic processes enhance accuracy and efficiency, they also can blur separation of functions so the awarding and disbursement occur virtually simultaneously. Schools must set up controls that prevent an individual or an office from having the authority or the ability to perform both functions. In addition, the system also has controls that prevent cross functional tampering. Access to Powerfaids is designed to only allow individuals with special security classifications to make changes to the programs that determine student need and awards.

**Family defined:**
A member of an individual’s family is a parent, sibling, spouse, child, spouse’s parent or sibling’s spouse or child’s spouse.

**Audits**

The institution as a whole participates in a yearly audit that is conducted by an outside audit firm. This audit must be completed and submitted to the Department of Education within 6 months of the end of our fiscal year, which makes our audit due by December 31st of that year.

The Financial Aid Office randomly audits at least 10% of student files at the end of each award year to verify accuracy of packaging and awarding.

**PART 1.3 SATISFACTORY ACADEMIC PROGRESS (SAP)**

Satisfactory Academic Progress (SAP) is a federal regulation enacted to ensure that students complete their degree program in a timely manner while achieving minimum academic standards.

**Standards of Progress**

Federal regulations require students receiving financial assistance through Title IV federal financial aid to maintain SAP and be enrolled in classes required for their program of study.
These standards measure both qualitative (grade point average) and quantitative (number of credits earned) progress and are calculated at the end of each period of enrollment (semester). The Qualitative measurement evaluates the quality (GPA and academic standing) of the student’s academic work. Quantitative measurements evaluate the pace and progress by which a student is working toward completion of their program of study. This is measured by establishing a required percentage of credit hours that must be passed when attempted and by a maximum timeframe that the student has to complete their required coursework.

**Qualitative**
All students must be in good standing with LCOOC and maintain the minimum grade point average (GPA) of 2.0 each semester. Sub-terms for cohort programs are not considered separate terms for SAP purposes and are included in the overall semester calculation. Students failing to meet this standard will be placed on Warning status for one semester and will continue to be eligible for that semester. Failure to meet the 2.00 GPA requirements for two consecutive semesters will result in financial aid Suspension.

**Quantitative**
Students are expected to successfully complete the credits for which they are enrolled. Credits completed will be reviewed at the end of each semester to determine that progress is being made toward completion of the program of study. Grades of A, B, C, D, P and S will count as completed credits. Grades of F, I, AW, and W will not count as completed credits.

If a student changes their academic program (changes majors), credits specific to the earlier major(s) will still be evaluated when determining a student’s SAP status. Therefore, coursework taken by a student for enrollment in another major(s) will be counted during their SAP review.

**Pace of Progression**
Students must maintain a Pace of Progression completion rate of at least 67% of the credits for which they attempt. Pace of Progression is reviewed at the end of each semester and is based on the cumulative credits completed divided into the cumulative number of credits attempted. Those who fail to meet pace of progression at the end of the semester will be placed on warning status; two consecutive semesters will result in financial aid suspension.

Pace of Progression examples for a student enrolled full time (12 credits or more):
- **Example 1**: Student attempts 15 credits; and successfully completes 12 credits. 12/15=80%. Student is in good academic standing
- **Example 2**: Student attempts 15 credits; and successfully completes 9 credits. 9/15=60%. Student is placed on warning status and will continue to receive aid.

**Maximum Time Frame**
The number of credits attempted includes classes that the student has taken at LCOOC and transfer credits (that apply to their program of study) from other colleges or universities, regardless of whether financial aid was received while enrolled in those classes. Repeated classes, failed classes, withdrawals, and incompletes are also counted toward the number of credits attempted. The only exceptions are classes withdrawn prior to the Date of
Record. The maximum timeframe in which you must complete an educational program is determined by multiplying the total credits in your degree by 150%.

- **Example 1**: Liberal Arts 63 credits required - Maximum credits allowed $63 \times 1.5 = 95$

- **Example 2**: GIS Certificate 31 credits required - Maximum credits allowed $31 \times 1.5 = 47$

**Academic Amnesty**

Academic Amnesty may be granted through the Registrar/Academic Dean offices to exclude certain grades or semesters in order to improve a student’s GPA; however, financial aid regulations make no provision for this concept, and MUST include total hours attempted in calculating SAP.

**Financial Aid Warning**

When a student fails to meet SAP, a warning letter is sent informing them they did not meet pace of progression and/or the 2.0 GPA requirements. The letter specifies that the student will continue to receive Title IV funding, but failure to meet SAP requirements during their next period of enrollment results in financial aid suspension.

**Financial Aid Suspension**

If a student fails to meet SAP for their next period of enrollment after receiving a warning letter, they are placed on Suspension and may submit an appeal to the Financial Aid Committee. Students placed on financial aid suspension will not be eligible for Title IV funding.

**Reinstatement of Financial Aid (Appeal)**

Students suspended from financial aid eligibility may submit a written appeal with appropriate documentation to the financial aid office. According to the Federal Student Aid Handbook “When a student loses FSA eligibility because he failed to make satisfactory progress, if the school permits appeals, he may appeal that result on the basis of: his injury or illness, the death of a relative, or other special circumstances. This appeal must explain why the student failed to make satisfactory progress and what has changed in his situation that will allow him to make satisfactory progress at the next evaluation.” The appeal must include:

- A statement that includes pertinent information that will explains the situation or mitigating circumstances that resulted in not maintaining satisfactory progress and steps the student will take to insure future compliance.
- Documentation from a third party (such as a statement from a doctor or a counselor) supporting these circumstances.

Once the required paperwork is received, the financial aid office will schedule a meeting with the Financial Aid Committee within a timeframe that takes into consideration student status and maximum efficacy. An approval by a majority of members for any Financial Aid Committee evaluation must be satisfied for approval of any award or probationary status. The student will be notified within two weeks of the committee’s decision. The decision may include an academic plan that the student must follow in order to be eligible for Title IV aid.

If the Financial Aid Committee approves the appeal, the student is placed on financial aid Probation for that period of enrollment and is eligible for Title IV funding. However, if the
appeal for reinstatement is denied or no appeal is made, the student must pay all tuition and fee charges until the minimum satisfactory progress requirements are met and the student is reinstated. All decisions made by the Financial Aid Committee are final.

**Academic Plan (after an appeal)**
For the student who may not be able to meet SAP in their next period of enrollment, the Financial Aid Committee may elect to provide an academic plan which will spell out specific goals and completion dates. As long as the student is following the plan, they will remain eligible for funding. However, if they fail to meet the plan requirements, they will be put back on suspension and become ineligible.

**Limit of Appeals**
There is currently a three time limit on the number of appeals a student can submit; however, a student may not appeal using the same extraordinary and extenuating circumstance twice.

**Reestablish Eligibility**
When a student is denied their financial aid appeal or makes the decision to not file an appeal, they will need to make other payment arrangements with the Bursar. Once a student successfully meets SAP for their current period of enrollment, they are eligible to receive financial aid funding for their next period of enrollment.

**Financial Aid Probation**
Once the student has been reinstated and maintained SAP for one semester, they will be given a letter stating that they are in good financial aid standing. However, if the student does not meet SAP for the semester for which they were reinstated, they will be placed back on Suspension and are ineligible for financial aid.

**Repeated Courses**
Grades of F, AW, I,W count as course attempts for the purposes of distributing Pell. Federal financial aid (Pell) will not be awarded for classes attempted more than twice, regardless of whether federal funding was used for either of the first two attempts.

**PART 1.4 CONFLICTING DATA**
**Part A: Resolving Conflicting Data:**
The F/A Department requires conflicting data be reconciled prior to an applicant’s receipt of financial aid. Data resolution pertains to:

- **Applicants selected for verification** - If there is reason to believe that any information on the application used to calculate the EFC is discrepant or inaccurate (or if any supporting documentation is discrepant or inaccurate), the FA Department requires the applicant to provide adequate documentation to resolve the conflict.
- **Applicants not selected for verification** – The Financial Aid Department resolves conflicting information regardless of whether or not the applicant was selected for verification. As required, the department will review all tax information provided to the school even if they were not requested. All C Codes on the ISIR will be reviewed and resolved by the financial aid department.
• **Other applicant information received by the school** – LCOOC maintains an adequate internal system to identify conflicting information that may be obtained, regardless of the source. The office lead for each of the following offices is required to provide information that could impact the financial aid status of each student applicant: **Admissions Office**: High School Diploma; **Fiscal Office**: Report outside awards; **Graduate Aid Office**: Report outside awards; **Registrar**: Report changes in enrollment; **FWS Office**: Report FWS earning in a calendar year; **NSLDS**: Review financial aid history, including aid received from prior colleges attended.

**Examples of Conflicting Data:**

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

**Part B: Fraud and Abuse:**
Should fraud or abuse be detected or suspected, report it to the Director of the Financial Aid Office. The Director will consult with the school’s legal counsel prior to referring it for investigation to the Office of the Inspector General of the Department of Education or any agency outside the school.

All credible information indicating that an applicant for Title IV may have engaged in fraud or other criminal conduct will be provided. Fraud is intent to deceive as opposed to a mistake. In addition we will refer any third-party servicer who may have engaged in fraud, breach of fiduciary responsibility, or other illegal conduct involving the FSA Programs.

**OIG Address and Phone Numbers**
Office of Inspector General
U.S. Department of Education
PART 1.5 FISCAL AND CASH MANAGEMENT

Fiscal Reports and Financial Statements
The Financial Aid Office emails reports that document all financial aid transactions to the Business Office. The Business Office will post to the General Ledger after they receive confirmation of the G5 drawdown (from the Office of Business Affairs) and the bank statement showing the funds have been deposited into the bank account.

Each Title IV program has their own General Ledger account number which documents individual transactions. These accounts are reconciled on a monthly basis.

Retention of Required Records
Paper Records are maintained for a period of 5 years; electronic records are kept indefinitely. Listing of required records:
- Institutional Student Information Record (ISIR)
- ISIR changes
- Verification paperwork
- Award Letter
- Software reports (PowerFAIDS, Jenzabar, Microsoft Office)
• Return to Title IV Worksheets
• FISAP
• IPEDS
• ECAR
• PPA
• Supporting documentation to calculate completion and graduation rates
• All records pertaining to the administration of FSEOG, FWS and Pell programs.

General Requirements
LCOOC maintains the required records in an organized manner with identifying labels for easier access. The records will be made available to the Secretary or their authorized representative upon request. All records can be reproduced in hard copy if needed.

Examination of Records
LCOOC will cooperate with independent auditors, the Secretary, the Department of Education Inspector General, and the Comptroller General of the United States or their authorized representatives in the conduct of audits, investigations, program reviews, or other reviews authorized by law.

The cooperation includes timely access for examination and copying requested records. And, reasonable access to personnel associated with administration of the Title IV programs to obtain relevant information.

Disbursing Title IV Funds
Disbursement
Title IV funds are requested from COD and once disbursements are accepted, the financial aid software (PowerFAIDS) will transfer the funds into the student account in Jenzabar that same day. Financial aid staff will review all student award packages at the beginning of the term and ensure disbursements occur in correct payment periods.

Disbursement by payment period
The following criteria must be verified before a disbursement is made:
1. The student is fully admitted to the College in an eligible program
2. Number of hours enrolled at the census date
3. Possess one of GED/HSD/HSED
4. Meeting satisfactory academic progress

Disbursement Dates
Financial aid staff will import the monthly Student Account Statement generated by COD into PowerFAIDS. The staff will also use any mismatch data from the SAS report and compare COD, Jenzabar, & PowerFAIDS disbursement dates to ensure all disbursement dates match and are accurate. If any mismatches occur, the student’s disbursement date will be manually adjusted or updated.
Fall Semester 2020:
Financial aid does not disburse any aid until October 1, 2020. Pell disbursements occur starting the 5th week of the semester (on or before October 1, 2020) if no issues exist (i.e. FAFSA/verification is complete and/or high school completion information is on file). BIA awards and private scholarships are typically disbursed toward the end of September or beginning of October. Any subsequent funding will be disbursed bi-weekly throughout the semester for qualifying students and as administratively feasible.

Spring Semester 2021:
Financial aid does not disburse any aid until March 1, 2021. Pell disbursements occur starting the 5th week of the semester (on or before March 1, 2021) if no issues exist (i.e. FAFSA/verification is complete and/or high school completion information is on file). BIA awards and private scholarships are typically disbursed toward the end of February or beginning of March. Any subsequent funding will be disbursed bi-weekly throughout the semester for qualifying students and as administratively feasible.

Summer Semester 2021:
LCOOC has opted to establish a policy that designated its summer term as a trailer of the academic year for all students. We also reserve the right to make different designations for different educational programs, or for different students, as long as we ensure that there is no overlap in academic years.
LCOOC has opted to establish summer term as a trailer to benefit students who may wish to use their Year-Round PELL as long as they meet eligibility requirements. Students must attend at least half time in the summer term to receive the 150% PELL LEU per award year. Please contact the Financial Aid Department if there are questions regarding summer term and financial aid usage.
Financial aid does not disburse any aid until June 9, 2021. Pell disbursements occur starting the 3rd week of the semester (on or before June 14, 2021) if no issues exist (i.e. FAFSA/verification is complete and/or high school completion information is on file). BIA awards and private scholarships are typically disbursed toward the end of June or beginning of July. Any subsequent funding will be disbursed bi-weekly throughout the semester for qualifying students and as administratively feasible.

Direct payment
Financial Aid is disbursed by the Financial Aid Office and then applied to the student account by the Business Office. Once current charges are paid in full, any remaining aid is issued via refund check which is mailed to the student address on file or the students can sign up for direct deposit. Which they would complete the sign up procedure with the business office.

Crediting a student’s school account
Title IV funds can only be credited to a student’s account to pay for current year educationally related charges incurred by the student. However, prior award year charges of not more than $200 may be credited to an outstanding balance on the student’s account in accordance with Federal Student Aid policies developed by the Department of Education and outlined in the Federal Student Aid Handbook.

Credit balances
A disbursement of credit balances to the student transpires within 14 days after the credit balance occurred.

Early disbursements
LCOOC does not participate in early disbursements at this time. Disbursements start after the census date and continue in the subsequent weeks throughout the semester.

**Late disbursements**

An otherwise eligible student may become ineligible for Title IV funding after they are no longer enrolled for the award year. However, if the student possessed a valid ISIR with an official EFC before they became ineligible, they qualify for a late disbursement or post-withdrawal disbursement. The disbursement must be made within 180 days of the student’s ineligibility (last date of academic activity).

**Returning funds**

When a disbursement is paid by check and it doesn’t clear, LCOOC has 240 days from the date of the check to return the funds to the Department of Education. If the check is returned and there is no other viable address to make a second attempt, the funds are required to be returned within 45 days of the date that the check was returned.

The Bursar and/or Business Office will notify the financial aid office of any returned or uncleared checks.

Once a student’s financial aid package is fully awarded up to their financial need, additional funds will not be awarded unless they have requested (in writing) a budget increase for a financial hardship or other emergency expense beyond the normal cost of attendance (receipts or other support documentation will be requested for verification). In the event the student’s financial need has been met for the academic year (unmet need is zero) any excess funds will be returned to the agency or outside provider within 45 days.

**Provision for books and supplies**

Pell Grant eligible students are given the option of getting a textbook authorization form in order to have a credit applied to the student’s account on the virtual bookstore E-campus. The charges are accrued to the student’s account and typically paid for from the first F/A award disbursement. Students who choose to purchase books elsewhere can obtain ISBN numbers at [www.lco.edu](http://www.lco.edu), but must pay for their books out-of-pocket.

If students use the textbook authorization voucher to purchase their books, they are considered to have authorized the use of Title IV funds and no written authorization is needed.

**Notices and authorizations**

The Award Letter (See Appendix B) is the notice that lists the Title IV awards and amount of funds a student may be able to receive. It is sent to a student once their FAFSA is complete and the determination is made that they are eligible for Title IV funds. The Award Letter also explains that disbursements will be credited to the student accounts, and refunds will be drafted within 14 days of disbursement.

LCO operates on a passive acceptance policy. Students awards are automatically accepted on behalf of the student unless otherwise declined through verbal or written communications.
Excess cash
The Director of Business Affairs and Financial Aid Office work together to insure that any issues with excess funds are handled within the 3 day timeframe. The FAO will request the exact funds that should be in G5 and based on the request and backup paperwork, the Director of Business Affairs will draw down the requested amount.

However, in the event that excess cash does occur, LCOOC will not keep excess cash on hand for longer than 7 days and the amount must not exceed 1% of funds drawn down in the prior award year. Any amount of excess cash over the one-percent tolerance and any amount remaining in our account after the seven-day tolerance period must be returned immediately.

PART 1.6 FINANCIAL AID COUNSELING
The foundation of most financial aid starts with the Free Application for Federal Student Aid (FAFSA) which can be found at www.fafsa.gov. Students will need a unique ID which can be obtained through www.fsaid.ed.gov. Students will use this ID to sign the application. Our school code is 017199.

1. Begin the aid application process after October 1 of each year.
2. File the FASFA
3. Submit BIA & WIG
4. Complete AICF-TCU
5. When a file is complete the aid award process will begin.

Student Eligibility for Financial Aid
The LCOOC financial aid staff ensures that the eligibility requirements are met before a student is considered eligible for Title IV funding. When a student’s financial aid file is complete, the awarding process begins. Student eligibility requirements are listed below.

1. Must be a U.S. Citizen or eligible noncitizen.
2. Must be admitted as a regular student and meet all admission requirements.
3. Must be a high school or GED graduate.
4. Must make satisfactory academic progress towards a degree or certificate.
5. Must not be in default on any previous federally sponsored education loan.
6. Must be registered with Selective Service, if applicable.
7. Must not owe a Federal Pell or FSEOG repayment.
8. Must have completed Drug worksheet if required.
9. If requested, must verify information used to determine their financial need with the appropriate documentation (verification forms and tax return transcripts).
10. Copy of Social Security Card, if required.

Cost of Attendance (Budget)
The cost of attendance (COA) is the cornerstone of establishing a student’s financial need, as it sets a limit on the total aid that a student may receive for purposes of the TEACH Grant, Campus-Based programs, and Stafford/PLUS loans, and is one of the basic components of the Pell Grant calculation. The student cost of attendance budgets are reviewed on a yearly basis and are compared with the cost of attendance budgets at similar colleges.
Tuition and Fees
This includes costs of rental or purchase of equipment (including equipment for instruction by telecommunications), materials, or supplies required of all students in the same course of study. Tuition charges are capped at 15 credits and may be increased to reflect actual charges.

Room and Board
LCOOC does not have on-campus housing. An estimate of expenses associated with housing is specified in the COA Budget and based upon national and regional recommendations published by the College Board. The actual cost incurred by an individual student varies among the student population.

Books
A cost estimate for books and supplies are obtained from the Accounts Receivable/Virtual Bookstore Manager and posted on the college website.

Transportation
An estimate of expenses associated with commuting to school is specified in the COA Budget and based upon national and regional recommendations published by the College Board. The actual cost incurred by an individual student varies among the student population.

Personal Expenses
An estimate of personal expenses is specified in the COA Budget and based upon national and regional recommendations published by the College Board. The actual cost incurred by an individual student varies among the student population.

Dependent Care
An additional $600 may be added to Personal for 2 or more Dependent Children. The F/A also considers information provided by the student for determining adjustments to an individual budget.

Exceptions to Normal COA
Students who are enrolled less than half-time
Only the costs for tuition and fees and allowances for books and supplies, transportation, room and board for a limited duration, and dependent care expenses may be included as part of the cost of attendance (miscellaneous/personal expenses may not be included).

Professional Judgment
The Financial Aid Director has the authority to use professional judgment to adjust the cost of attendance on a case-by-case basis to allow for special circumstances (budget increase requests will be in writing and well-documented). Such adjustments will be documented in the student's file. Tuition may be increased to reflect actual charges.
PART 2.1 GENERAL REQUIREMENTS
The Financial Aid Director is responsible to submit timely and complete ECAR information to the Department of Education.

A copy of the E-App along with supporting documentation and submittal date is kept in the Financial Aid Director’s Office (Room 209) in the right hand desk drawer in a bright green file folder.

The signed Program Participation Agreement is kept along with the E-App in the Financial Aid Director’s Office (Room 209) in the right hand desk drawer in a bright green file folder. The Program Participation Agreement expiration date is September 30, 2024.

PART 2.2 UPDATING INFORMATION
The Financial Aid Director will be notified of any changes to the information that is reported on the E-App (see list below). This information must be reported to the Secretary within 10 days of the change.

The Financial Aid Director will be responsible for coordinating the response to the Secretary in regard to any reported changes that affect the institution’s eligibility and the effective date of the response.

Information reported on the E-app
- Institution Name, Address, Type, ID’s
- Accrediting Agency
- Academic calendar, Educational programs offered
- Approval listing of Title IV programs
- Officials Listing
PART 2.3 ADMISSIONS POLICY

Statement of Admissions
The Lac Courte Oreilles Ojibwe College has a policy of open enrollment. Students who wish to attend and complete all admissions requirements are welcome. New students are required to complete the following admissions requirements. Students must be admitted and receive a letter of acceptance before the student is enrolled in any course.

1. Supply proof of high school, GED, or HSED completion. The only exception is:
   a. High School seniors may enroll in LCOOC courses with the approval of both college officials and the high school principal or counselor. Upon high school graduation, credits will become official.

2. Provide official transcripts from all post-secondary institutions attended. Otherwise, the Registrar’s Office will send for them for a fee per transcript.

3. If Native American, supply proof of tribal enrollment or letter of tribal affiliation.

4. Schedule and successfully complete the COMPASS basic skills assessment, which is utilized as an academic advising instrument for placement in appropriate courses and may indicate need for additional preparation prior to admission into a regular course of study. Additional assessment may be utilized as deemed necessary by the college.

   Exceptions:
   a. Students taking HTH 110 Nursing Assistant as their only course

5. Individuals taking courses for personal enrichment may apply for exemption from this requirement in the Registrar’s office.

6. Copy of Social Security Card will be made and placed in student’s admission file.

7. Interview with assigned advisor from major field of study

8. Completion of the free application for Federal Student Aid (FAFSA) to determine financial aid eligibility and the process for payment of tuition and fees is required.

The steps stated above and the signed Admission Checklist is necessary for admission to LCOOC. Failure to meet and complete the above by the end of the add/drop deadline will result in a failure to obtain regular admission into the Lac Courte Oreilles Ojibwe College.

Statement of Financial Obligation
Students are responsible for fees and tuition for all coursework for which they are registered. Arrangements must be made with the Bursar for payment of fees and tuition or the student may be subject to Administrative Withdrawal.

Readmission
All students who have been away from LCOOC for a semester or more must file a “new” application form and pay the $5.00 readmission fee. Students who have obtained an associate degree from LCOOC may not qualify for financial assistance for the pursuit of another associate degree for a period of two years. Exception to this policy may include a significant change in the job market or employer verification of a need for retraining. Such waivers will be granted under the discretion of the Registrar and the Admission Committee.

Re-entry and Catalogs
Students admitted to LCOOC must meet the academic requirements of the catalog they are originally admitted under. A student may, at any time, choose to follow the requirements under a newer catalog by talking with their advisor or the Registrar’s office.

If, however, a student does not attend for four consecutive semesters, upon readmission the student must meet the requirements of the newest available catalog. Because program or course requirements may have changed since the student last attended LCOOC, students should talk with their advisor or the Registrar’s office about what has changed, and how it affects the course they should take.

If denied admission or readmission to LCOOC, a written appeal must be received within 15 working days of the date of notification from the Admissions Committee.

Admission of Transfer Students
Comparable course/credits earned at other accredited institutions, with a grade of “C” or better, may be accepted upon transfer to LCOOC. It is the responsibility of the student to provide official transcripts of all work completed at other institutions.

Pre-registration
Pre-registration is held for three weeks prior to the beginning of classes for each semester. Potential students will be assisted throughout the process in meeting admissions requirements, registering for courses, and applying for financial aid. A student taking over 15 credits must have written permission from the Registrar and the Academic Dean.

Late Registration
LCOOC may extend registration dates as dictated by the proper administrative authority.

Adding and Dropping Classes
Subject to available space and instructor approval, a student may add a course during the first two weeks of the semester or drop a course during the first three weeks of any semester. This action, however, may affect financial aid. Students must formally complete the necessary forms to add or drop courses.

Withdrawal from a course
Students officially withdrawing prior to the final semester drop date as determined by the curriculum committee will not have the withdrawn courses entered onto their permanent record. Those students withdrawing after the term’s first drop date will have their records marked with a “W” for withdrawal. Students are reminded that once the admission’s clerk has entered their
course, laboratory, or workshop selections into the college computer system, they are officially registered. Student charges are assessed the first business day after the semester drop date (census date); student accounts are charged with tuition and related fees pertaining to the courses selected. Accounts may be cleared of payments of fees owed, or of a credit initiated by an Add/Drop form. Non-attendance does not constitute a withdrawal. Students must complete official college withdrawal forms or receive a grade for the course. Failure to withdraw in writing may result in the imposition of full financial aid and academic penalties. A student may withdraw from any course up to the end of the 12th week of classes. No withdrawals will be accepted after the end of the 12th week of classes unless faculty or staff recommends an exception be made for an extreme case. A withdrawal may be granted at the discretion of the Academic Dean. If a student does not officially withdraw from a class, the final grade submitted by the instructor will be the grade listed on the student’s official transcript.

All mid-term and final F grades will be monitored and followed up on to determine R2T4s throughout the term. Financial aid staff will contact instructors and monitor the “myLCO” online system for attendance and grades.

**Administrative Withdrawal**
Students who register for classes, but who are incapable of attending, may be withdrawn from all classes by the institution. Though the “AW” appears on the transcript, it will not affect the student’s overall grade point average.

An Administrative Withdraw exists to allow a student who is incapable of withdrawing to withdraw from courses without penalty. If, for example, a student is undergoing surgery and will be in the hospital for week, the student would be incapable of either attending classes or filling out the necessary paperwork in person to drop those classes.

An administrative withdrawal is not intended to remove the onus for personal responsibility from students. The administrative withdrawal will be used sparingly and only with due process and documented concerns.

**Withdrawal from College**
Students discontinuing their studies at LCOOC during the academic year must fill out the official forms. Students leaving college before semester’s end without completing the prescribed forms may receive a grade of “F” for all incomplete courses and will not be eligible for any fee refunds.

**Incentive Payments**
LCOOC does NOT provide a commission, bonus or other incentive payment based in any part, directly or indirectly on success in securing enrollments or financial aid to any person, entity engaged in any student recruiting or admission activities or in making decisions regarding awarding TIV funds.

**NSLDS Process**
**Enrollment**
Enrollment reported is conducted by the IT Department and updated through the NSLDS Clearing House. Financial Aid department is to work closely with the IT department to have
standard reports of withdrawn students processed on a bi-weekly basis to ensure accurate NSLDS reporting of enrollment status changes are made within the required deadlines. If it is found within the 14 day timeline that a student’s enrollment status has been changed and not reported, the IT Director will be notified to make necessary changes in NSLDS.

Transfer Students – needs to be obtained from catalog/handbook committee

PART 2.4 STATE AUTHORIZATION
LCOOC can provide documentation (HEAB disbursement roster) that identifies the institution by name as participating in a State Grant Program, where students receive State funds that can only be provided to students who attend postsecondary institutions.

GENERAL PROVISIONS
SECTION 3

PART 3.1 CERTIFICATION
The current certification for LCOOC expires on September 30, 2024. At least 90 days prior (September 30, 2024) to the expiration date, recertification will occur. However, we may certify up to 6 months prior to September 30, 2024.

PART 3.2 TITLE IV REFUNDS
If a student withdraws from all of their classes before 60% of the semester has been completed, LCOOC or the student, or both, may be required to return all or a portion of the Title IV funds that were awarded to the student, with the exception of Federal Work Study. The percentage of federal aid to be returned (unearned aid) is equal to the number of calendar days remaining in the semester when the withdrawal takes place divided by the total number of calendar days in the semester. Scheduled breaks of more than five consecutive days are excluded. If a student has completed more than 60% of the semester, all aid is considered to be earned, and the “return of funds” regulations no longer apply.

Withdrawal – Official Notification
Official notification from the student is any official notification that is provided in writing or orally to a designated campus official acting in his or her official capacity in the withdrawal process. Acceptable official notification includes notification by a student via telephone, through a designated website or orally in person. The responsibility for documenting oral notification is the registrar’s office; however, they may request, but not require, the student to confirm his or her oral notification in writing.

If a student provides official notification of withdrawal by sending a letter to the Registrar’s office stating his or her intent to withdraw, the withdrawal date is the date that the Registrar’s office receives the letter. However, the Registrar reserves the option of using the date of a student’s last participation in an academically related activity as long as that participation is documented by a campus official.

Intent to withdraw means that the student indicates he or she has either ceased to attend or does not plan to resume academic attendance or believes at the time he or she provides notification that he or she will cease to attend. A student who only requests information on aspects of the
withdrawal process, such as the potential consequences of withdrawal, would not be considered a student who is indicating that he or she plans to withdraw. However, if the student indicates that he or she is requesting the information because he or she plans to cease attendance, the student would be considered to have provided official notification of his or her intent to withdraw.

**Unofficial Withdrawal**
A student who leaves LCOOC does not always notify the registrar’s office of his or her withdrawal. There are two categories of these unofficial withdrawals for purposes of this calculation. First, if it is determined that a student did not begin the withdrawal process or otherwise notify of their intent to withdraw due to illness, accident, grievous personal loss, or other circumstances beyond the student’s control, the withdrawal date is the date the school determines that the student ceased attendance because of the aforementioned applicable event. The second category of unofficial withdrawals encompasses all other withdrawals where official notification is not provided. For these withdrawals, commonly known as dropouts, the withdrawal date is the midpoint of the payment period or period of enrollment, as applicable, or the last date of an academically related activity that the student participated in.

*It is important to note that students who withdraw may also fail to meet the Satisfactory Academic Progress Standards as required.*

**Leave of Absence Policy**
The purpose of a leave of absence is to provide the student the opportunity to temporarily leave the college without penalty. Students that take a Leave of Absence must:
1. Make an appointment with the Financial Aid Director to discuss the need for a leave of absence.
2. Complete and submit a request for Leave of Absence Form.
3. Provide written documentation to support the request for leave of absence.

The student requesting the leave of absence must document and demonstrate the need for the leave of absence. The Director after reviewing the request for leave of absence form and documentation will either approve or disapprove the leave of absence. The Director will notify the student of the decision.

**Leave of Absence Conditions and Requirements**
The numbers of days in a leave of absence are counted beginning with the first day of the student’s initial leave of absence in a 12-month period. The leave of absence cannot exceed 180 days in any 12-month period. A student may only be granted one leave of absence during any 12-month period. One subsequent leave of absence may be granted if
1. the subsequent leave does not exceed 30 days;
2. the institution determines that the subsequent leave of absence is necessary due to unforeseen circumstances; and
3. the total number of days of all leaves of absence does not exceed 180 days in any 12-month period.
Subsequent leaves of absence may be granted for documented jury duty, military reasons, or circumstances covered under the Family and Medical Leave Act of 1993, provided that the total number of days of all leaves of absence does not exceed 180 days in any 12-month period.

Note: A leave of absence need not consist of consecutive days when granted. It is the responsibility of the Director to monitor all leaves of absence in order to assume the college is in compliance with the Federal Leave of Absence Regulations.

**Institutional Withdrawal Notification**
The registrar’s office will notify the Financial Aid Office by email of all students that drop or withdraw from classes and/or the College. The Financial Aid Office will determine if the withdrawn student that has received Federal Title IV is subject to the Federal Refund Policy.

**Return to Title IV Funds**
The Return of Title IV Funds formula dictates the amount of Title IV aid that must be returned to the Federal Government by the college and the student. The programs that are under this policy are the Federal Pell Grant and FSEOG Grant or other federal aid other than FWS. The priorities for restoring funds are Federal Pell Grant first, and then the FSEOG Program and lastly, other Title IV grant funds. A school must always return any unearned Title IV funds it is responsible for returning within 45 days of the date the school determined the student withdrew.

**Return of Title IV Procedure**
LCOOC has enacted the following procedures for the Return to Title IV (R2T4) in a timely manner:

- **Official Notification**
  - Once an email is received for the official notification, other information will be collected in order to fill out the R2T4 worksheet.
    - Student Statement of eligible institutional charges (Tuition, Fees, Books, etc.)
    - Demographic information from PowerFAIDS
    - Amount of funding that was disbursed.

- **Unofficial Notification**
  - Faculty will be required to provide attendance records for their classes, which will enable the Financial Aid Office to readily review student attendance and determine exact dates for a student’s unofficial withdrawal. With this date ascertained, R2T4 calculations will be able to commence accurately.
  - Mid-term Grades will be the trigger for students who may have unofficially withdrawn. Students who have failing grades at mid-terms will be identified through Jenzabar and their attendance records will be reviewed. If attendance records show that a student has disengaged from the College and the financial aid office is fairly certain that they will not return, the R2T4 calculation can begin at that point. Otherwise, the calculations will begin 30 days from the end of the term.
  - Upon review of final semester grades, those students who have all failing grades who did not show up during the review of mid-term grades will be reviewed to determine the
nature of failing grades. If a student unofficially withdrew after mid-term grades were posted but before the 60% of the semester mark has been passed, additional R2T4 calculations will be made for those students.

- All charges for tuition, fees, and room and board (if contracted with the school) are included for completion of R2T4 calculations for those additional students.
- Institutional charges are used to determine the portion of unearned Title IV aid that the school is responsible for returning. The following educational expenses are considered institutional expenses for required course materials (books, kits, tools, supplies, etc.) if the student does not have a real and reasonable opportunity to purchase the required course materials from any place but the school.

Exceptions: Excludable costs are costs a school may exclude from the total amount of institutional costs, such as the documented cost of non-returnable equipment and documented cost of returnable equipment if not returned in good condition within 20 days of withdrawal.

School Portion of the Return
The amount of unearned aid that must be returned by LCOOC is a percentage of the institutional charges for the term. Once the dollar amount of the school portion of the Return is determined, it is compared to the total amount of all unearned aid. If the school portion is less than the total unearned aid, then LCOOC must return the amount of the school portion. If the calculated school portion exceeds the total unearned aid, then LCOOC return the amount of the total unearned aid.

Student Portion of Return of Title IV Funds
After the school returns the correct amount of aid, any amount of the total unearned aid that remains becomes the student portion of the Return. The student portion of the Return is calculated by subtracting the amount of the school Return from the total unearned aid. Total Unearned Aid (Subtract) School Return Amount (Equals) Student Portion of Return.

Return of Title IV Funds Web Product
LCOOC utilizes PowerFaids to facilitate R2T4 calculations. Each worksheet is calculated online and retained within the PowerFaids record system.

The Financial Aid Office requires the following documentation for data input into the PowerFAIDS system to calculate R2T4’s:
- Withdrawal Form (if applicable)
- Attendance Records
- Student Account Inquiry

The last date of attendance, date of determination, aid that has been/could have been disbursed, along with qualifying charges are entered in as the documentation provides. The scheduled break days are recalculated and if less than 60% of the semester has been completed the amount required for the school to return will be completed within 30 days.
**Student Notification**
The Return of Title IV requirements are provided to the student in the admissions packet, online at [http://www.lco.edu](http://www.lco.edu), catalog, and sent to their student email during the first week of each semester.

**PART 3.3 COMPLIANCE AUDITS (Business Office)**
LCOOC hires an outside audit firm, CliftonLarsonAllen LLP, to conduct a compliance audit of Title IV funds administration and general purpose financial statements. The audits are conducted after the fiscal year end of June 30th and must be submitted to the Secretary no later than December 31st (6 months).

**PART 3.4 CONSUMMNER INFORMATION**
The Lac Courte Oreilles Ojibwe College is required by law to make available to enrolled students, prospective students, and their parents certain information about its operations. Such information pertains to: (1) general institutional operation, (2) financial aid, (3) general completion and graduation rates, and (4) annual security report.

To meet the requirement, information for the LCOOC is provided below. Web site addresses are specified for all information items, as well as telephone numbers and e-mail addresses of the college officials who can respond to questions or information requests in their specific areas. If requested, LCOOC can provide hard copies of any of the information displayed on the website [www.lco.edu](http://www.lco.edu).

**Drug and Alcohol Policy –**
LCOOC students and staff promote a healthy lifestyle by adhering to a policy of being drug and alcohol free on campus and at all college functions.

Procedures for suspected abuse by students:
1. Any student or employee observing a student abusing drugs or alcohol needs to immediately inform the college administration.
2. It is then the college administration’s responsibility to inform the student of the policy and procedures and to complete an Incident Report.
3. The Incident Report is to be filed with the Dean of Student Services.
4. If student’s behavior indicates he or she is under the influence of drugs or alcohol and could be a danger to self or others, or could interfere with the education process of the college, a student services officer can arrange for student to be transported home.
5. The Dean of Student Services will facilitate counseling and/or assessment for the student if warranted.
6. The student services officer will collect documentation on abusive behavior as part of the Incident Report.
7. If behavior continues and documentation supports such action, the student will be referred to tribal social services or Sawyer County Human Services.
8. If student refuses services and abusive behavior continues, the student can be expelled from the college.
Confidentiality of Student Records – Family Education Rights and Privacy Act of 1974

In compliance with the Family Education Rights and Privacy Act of 1974 (FERPA), students who are or have been in attendance at LCOOC have certain rights to request, inspect, review, and challenge the records maintained by the institution under the provisions of the Act. The college does not permit access to or the release of education records or personally identifiable information contained therein (other than directory information) of students without the student’s written consent, other than to officials of the institution and those granted access by the Act.

The Family Educational Rights and Privacy Act (FERPA) allows a student certain rights with respect to their education records. They are:

1. **The right to inspect and review their education records within 45 days of the day LCOOC receives a request for access.**

   The student should submit to the Registrar written requests that identify the record(s) they wish to inspect. The registrar will make arrangements for access and notification of the time and place where records may be inspected. If the Registrar does not maintain the records, the Registrar shall advise the student of the correct official to whom the request should be addressed.

2. **The rights to request the amendment of education records that the student believes are inaccurate or misleading.**

   A student may ask LCOOC to amend a record that they believe is inaccurate or misleading by submitting a written request to the LCOOC officials responsible for the record, clearly identifying the part of the record to change, and specify why it is inaccurate or misleading. LCOOC will notify the student of their decision and advise them of their right to a hearing regarding the request for amendment. Additional information regarding the hearing will be provided to the student when notified of the right to a hearing.

3. **The right to consent to disclosures of personally identifiable information contained in the student’s education records, except to the extent the FERPA authorizes disclosure without consent.**

   One exception, which permits disclosure without consent, is disclosure to school officials with legitimate educational interests. A school official is a person employed by LCOOC in an administrative, supervisory, academic or research, or support staff position (including law enforcement unit personnel and health staff); a person or company with whom LCOOC has contracted (such as an attorney, auditor, or collection agent); a person serving on the Board of Regents; or a student serving on an official committee, such as a disciplinary or grievance committee, or assisting another school official in performing his or her tasks. A school official
has a legitimate educational interest and the official needs to review an education record in order to fulfill his or her professional responsibility.

4. The right to file a complaint with U.S. Department of Education concerning alleged failures by LCOOC to comply with the requirements of FERPA. The name and address of the Office that administers FERPA are:

   Family Policy Compliance Office
   U.S. Department of Education
   400 Maryland Avenue SW
   Washington, DC 20202-4605

Directory Information (Not subject to FERPA):
The following student information is considered to be Directory Information and is not subject to the above restrictions of public access or release:

1. Name, campus address, home address, telephone
2. Sex and marital status
3. Date and place of birth
4. Name and address of parents
5. Major and minor fields of study
6. Year in school
7. Dates of attendance
8. Degrees and awards received
9. Most recent previous educational institution attended

PART 3.5 VERIFICATION
LCOOC will not make interim disbursements for students who are picked for verification.

Forms and Documentation Reviewed:
A documents review is completed before a student’s file is completed and the packaging process begins. Following are the steps in this review process:

1. Ensure all information requested is complete on the form
2. Check that the application is signed and dated by the student.
3. Student record is checked to see if the student attended other schools.
4. Check transfer student’s financial aid history record on SAR or transcripts for loan defaults and Federal Pell or FSEOG repayments.
5. Check for any other documents needed to do a proper needs analysis on the student.

PART 3.6 PROFESSIONAL JUDGMENT & DEPENDENCY OVERRIDE
Federal regulations permit the College to exercise professional judgment in determining if unusual circumstances can be documented which would result in a dependency status change from Dependent to Independent for federal student financial aid purposes. The Financial Aid Director makes this determination on a case-by-case basis and the student is notified through their student email. Students must complete verification prior to requesting an appeal.

Dependent Student Override
If the student is Dependent by definition, but believes circumstances are present to establish him/her as “Independent”, the student can request a review of his/her unusual circumstances by the college. The following steps are required:

1. Student must provide, in writing, a full explanation of his/her unusual circumstances with specific, dates, etc., and,
2. Student must secure written documentation from other appropriate persons, agencies, etc., confirming the specifics as identified by the student. It must be in writing and signed and dated by the appropriate party. Documentation from family members will not be accepted.
3. Student is responsible for providing full written documentation to the Financial Aid Office within their specified time period.

PART 3.7 MISREPRESENTATION
Misrepresentation: Any false, erroneous or misleading statement an eligible institution makes to a student enrolled at the institution, to any prospective student, to the family of an enrolled or prospective student, or to the Secretary. Misrepresentation includes the dissemination of endorsements and testimonials that are given under duress.

Prospective student: Any individual who has contacted an eligible institution for the purpose of requesting information about enrolling at the institution or who has been contacted directly by the institution or indirectly through general advertising about enrolling at the institution.

Substantial misrepresentation: Any misrepresentation on which the person to whom it was made could reasonably be expected to rely, or has reasonably relied, to that person's detriment.

Nature of financial charges: Misrepresentation by an institution of the nature of its financial charges includes, but is not limited to, false, erroneous or misleading statements concerning-- (a) Offers of scholarships to pay all or part of a course charge, unless a scholarship is actually used to reduce tuition charges made known to the student in advance. The charges made known to the student in advance are the charges applied to all students not receiving a scholarship; or (b) whether a particular charge is the customary charge at the institution for a course.

PART 3.8 ABILITY TO BENEFIT
LCOOC does not participate in Ability to Benefit.

FEDERAL WORK STUDY POLICIES AND PROCEDURES

SECTION 4
Federal work-Study (FWS) is a federal financial aid program to provide part-time employment for eligible students. Funding is based on the information that is provided on the FISAP. A percentage of funding is set-aside for the LCOOC Public Library and LCO Farm (Summer Program) to meet the Title IV Community Service Requirement. Currently LCOOC is exempt from the institutional share requirement.

PART 4.1 SELECTION AND AWARDING OF STUDENTS
In order to qualify for FWS, students must meet all of the following:

1. Admitted as regular student meeting all requirements
2. Must be eligible for Title IV funding (ex. not in default on student loans)
3. Demonstrate financial need (COA-EFC)
4. Meet satisfactory academic progress (SAP) requirements

Award Amounts
The amount of funds available and the number of students seeking FWS positions determine amounts of FWS awards. Historically, we have been able to fund 15 students per semester on average.

Student employees may not earn more than the dollar amount of their award. It is the responsibility of the FAO, the payroll department, supervisor, and student to monitor FWS earnings to ensure that the employee does not earn more than the awarded amount.

It is possible for a student employees work program and award amount to change before and during the academic year. Changes could be the result of changing financial circumstances, receipt of additional financial aid, a change in the number of enrolled credits, etc.

FAO Responsibilities
1. Determines student’s eligibility for Work-Study
2. Updates/maintains Work-Study Job descriptions
3. Identifies Work-Study job locations and supervisors through job postings
4. Assists student with processing all financial-related paperwork
5. Process FWS contracts
6. Monitor student participation through Jenzabar reports

Employer Responsibilities
1. Provide proper training
2. Set expectations
3. Involve the student employee in the activities of department teams
4. Be a teacher/mentor and role model by displaying proper work ethics

Hiring Process
Department supervisors request a work-study position by submitting a job description to the Financial Aid Department. Those students who mark on their FAFSA that they are interested in Work Study and who meet all of the eligibility requirements, will get a FWS application mailed to them with their award letter. Once the FAO receives the completed application back, it will be forwarded to the supervisor of the open position. The supervisor will make their selection on the student who best meets their needs and will have the option to reject a student if they feel the student is not qualified for the position.

Once the student employee is hired, they complete and sign the Federal Work Study Contract from the Financial Aid Office and payroll records from the Business Office.

Federal Work Study Contract
Agreement with the student and the college that explains:
1. Rate of Pay and hours worked
2. Beginning and end date of contract
3. Injuries on the job
4. Benefits
5. Amendments to the contract
6. Abide by FWS guidelines
7. Confidentiality
8. Employment requirements

Time Cards
It is the supervisor’s responsibility to approve work time through Jenzabar and the MyLCO module by 12:00 p.m. on the Monday following the previous work week. Late time submissions will be processed the next pay period.

Work Hours
Student employees are restricted to working no more than twenty hours per week when classes are in session, unless pre-approval for more hours has been granted by the Financial Aid Director. If employed in more than one position, students are limited to a maximum total of twenty hours per week. Students cannot work when they are supposed to be attending class.

Lunch/Breaks
Student employees have a 15-minute break during each four consecutive hour segment and one unpaid half-hour break during each workday of eight or more. Such breaks will be taken at time approved by supervisor. Employees cannot be compensated for breaks not taken.

Sick Days
If student employee is ill, it is advised that they contact their supervisor as soon as they know they will not be able to report to work as scheduled. Failure of the student to report to their supervisor will result in a warning. The second unexcused absence results in a three-day layoff. The third unexcused absence results in termination of student employment.

Holidays
If a student employee will not be working their regularly scheduled hours during a break period or holiday, it is advised that they inform their supervisor as soon as they know. Vacation days and holidays are unpaid.

Rate of Pay
FWS students will earn $10 per hour. This rate is evaluated periodically and may vary depending upon:
1. The skills needed to perform the job
2. How much people with those skills are paid in the local area for doing same type of job
3. Rates the school would normally pay similar non-FWS employees
4. Any applicable federal, state, or local laws that require a specific wage rate

Paychecks
Paychecks are processed bi-weekly. If employed in more than one position, the employee will receive one check. FWS cannot be garnished.

**Summer Employment**
Federal Work Study summer employment capacity is determined by budget constraints and need.

**PART 4.3 FWS FISCAL PROCEDURES AND RECORDS**

**Transfers of Funds**
There are provisions that allow the transfer of funds among the Campus Based programs. LCOOC may transfer funds among Campus Based programs as follows:
- Transfer up to 25% of FSEOG allocation to FWS
- Transfer up to 25% of FWS allocation to FSEOG

**Carry Forward/Carry Back**
LCOOC may carry forward from its current allocation up to 10% of FWS to spend in the next award year or carry back 10% of its FWS allocation to spend in the previous award year.

**G5 Draw**
Any Campus Based funds carried forward or carried back between award years will be drawn from and reported in G5 as an expenditure against the Campus Based authorization for the award year from which the funds were taken, not the authorization for the award year in which the funds were used.

**Reconciliation**
Fund reconciliation is based upon both periodic and interval reconciliations. Reconciliation of Pell funding is performed on an ongoing basis during processing of federal and other funding. Funds are reconciled at time of disbursement to ensure funds are allocated properly. Any irregularities are noted for further review and processing as needed. All funding conducted by the Financial Aid department is forwarded to the Business Office, and Office of Sponsored Programs via email communications in real time to afford timely reconciliation of all appropriate funding information. Furthermore, funding reports are delivered on the first Monday following the last day of the month for funds reconciliation.

The reconciliation will tie out the following documents and explain any variances at a student level for correction prior to the next reconciliation meeting:
- The cash activity report from the COD system
- The disbursement register from the G5 reporting system
- The award detail by fund report from the PowerFAIDS system
- A general ledger detail report from the Jenzabar accounting system

**FEDERAL SUPPLEMENTAL EDUCATIONAL OPPORTUNITY PROGRAM (FSEOG)**

**SECTION 5**

**PART 5.1 SELECTION AND AWARDING OF STUDENTS**
The FSEOG Program provides need-based grants to help low-income undergraduate students finance the costs of postsecondary education.

Selection of Recipients
1. Student must be enrolled at least half-time (minimum 6 credits)
2. Meet SAP requirements
3. First selection group:
   a. must be students who have the lowest expected family contributions (EFC) who will also receive a Pell Grant.
4. A student who receives a Pell Grant anytime during the award year can be awarded FSEOG for both semesters even if they don’t receive the Pell Grant for both semesters. For example, a student may reach their Lifetime Eligibility Used (LEU) after the fall semester but can still qualify for FSEOG for both the fall and spring.
5. Second selection group:
   a. If there are any funds left over after the first selection group, LCOOC will award those students with the lowest EFCs who are not receiving a Pell Grant.
   b. This group also includes students who have exceeded their LEU.

Awarding
The FSEOG funding allocation that LCOOC receives is based on the information that was provided on the FISAP. 5% of the allocation will be drawn down from G5 for administrative cost allowance with the remainder awarded to students. The maximum FSEOG award for a full academic year is usually $400; however, that may change based on the allocation amount. The minimum FSEOG amount is $100 for the full academic year.

PART 5.2 FSEOG FISCAL PROCEDURES AND RECORDS

Transfers of Funds
There are provisions that allow the transfer of funds among the Campus Based programs. LCOOC may transfer funds among Campus Based programs as follows:
- Transfer up to 25% of FSEOG allocation to FWS
- Transfer up to 25% of FWS allocation to FSEOG

Carry Forward/Carry Back
LCOOC may carry forward from its current allocation up to 10% of FSEOG to spend in the next award year or carry back 10% of its FSEOG allocation to spend in the previous award year.

G5 Draw
Any Campus Based funds carried forward or carried back between award years will be drawn from and reported in G5 as an expenditure against the Campus Based authorization for the award year from which the funds were taken, not the authorization for the award year in which the funds were used.

Reconciliation
After the end of each month, the Financial Aid Director, Business Office Manager and Office of Sponsored Programs Director will submit their documentation to reconcile Title IV disbursements.
The reconciliation will tie out the following documents and explain any variances at a student level for correction prior to the next reconciliation meeting.

- The cash activity report from the COD system
- The disbursement register from the G5 reporting system
- The award detail by fund report from the PowerFAIDS system
- A general ledger detail report from the Jenzabar accounting system

**FEDERAL PELL POLICY AND PROCEDURES**

**SECTION 6**

**PART 6.1 CALCULATION PELL AWARDS**

The amount of Pell for which a student is eligible within the academic year is determined by the Department of Education through use of the Federal Methodology (FM) formula. An Expected Family Contribution (EFC) is determined through the FM calculation at the time the FAFSA application is received at Dept. of Ed. division of Central Processing. The 2020-2021 maximum Pell grant amount is $6,345 and is subsequently reduced in relation to the student’s EFC. The amount of the student’s actual award is dependent upon:
1. Degree plan
2. courses for which the student is registered
3. Remaining Lifetime Eligibility,
4. Attempted course load (Full, 3/4 time, 1/2 time, less than 1/2 time
5. Student’s Financial Aid status (Warning, Probation, Student Loan Default)
6. Attendance

The amount of Pell a student receives is based upon the students ISIR/SAR. There are two ways to receive a SAR (Student Aid Report)
1. Electronically from the EDE exchange to PowerFAIDS system
2. Student may bring in a hard copy.

When SAR is received the financial aid staff must check the following information.
1. Expected Family Contribution (EFC).
2. * By EFC (flagged to be verified).
3. C by EFC means student has eligibility problem and requires resolution.
4. Review any items in boldface type on part 2 and to do resolution if required.
5. Check student name and social security number.
6. Conflicting documentation must be corrected and SAR should be returned for corrections if the EFC changes because of corrected information.

If the SAR is flagged the student must complete a verification worksheet and submit signed copies of the IRS transcript for the prior year if the IRS Data Retrieval Tool was not used. The following six types of information must be verified:
1. Household size.
2. Number enrolled in post-secondary education.
3. Adjusted Gross Income.
4. Earned income from a W-2 if not required to file taxes but received a W-2.
5. U.S. income tax paid.
6. Other untaxed income not reported, such as workers compensation disability, etc:
   
   **Except:**
   b. Student aid
   c. Foreign income exclusion.
   d. Earned income credits.
7. Any other information that may be needed such as legal separation or divorce papers.

Students will be notified of the information they must submit by either student email account or by mail. No Federal Pell funds will be disbursed to a student until the verification process has been completed. The Financial Aid Department must report all changes and corrections to the Federal Pell system.

**Packaging Procedures**
After the individual students financial need has been determined by using the proper cost of attendance minus the E.F.C., the Director develops a financial aid package for the student using the Federal Pell Grant and determine the amount of the basis of the financial aid package. The Federal Title IV programs available are Federal Pell, Federal S.E.O.G. and Federal Work Study. The amount of Federal SEOG and Federal Work Study funds available from year to year is determined by the Department of Education. A student may be packaged up to his or her demonstrational need with a combination of Federal, State and local scholarship aid.

The Financial Aid Department evaluates the enrolled student population as of the Census Date and prepares qualified students files for potential disbursement of Title IV funds. The Financial Aid Department utilizes Jenzabar and PowerFAIDS software integration processes to ensure that all eligible students are identified and presented for funding. If errors in student funding occurs due to software anomalies students will be funded through manual requests to the Department of Education.

**PART 6.2 REQUIRED AND OPTIONAL RECALCULATIONS**

**Required Recalculations**

**Change in EFC**
If a student’s EFC changes due to corrections, updating, or an adjustment and the EFC would change the amount of Pell award, PowerFAIDS automatically recalculates the award for the entire year.

**Change in enrollment status between terms**
When a student changes their enrollment status between terms, Jenzabar, sends the corrected enrollment to PowerFAIDS, which changes the calculation to match the number of credit hours taken.

**Student does not begin attendance in all classes within a term**
Faculty tracks attendance through JICS and reports to the Registrar and FAO any student who never attended to the Registrar/FAO. When a student fails to attend a class before the census date they will be dropped for non-attendance and their enrollment status will be recalculated in PowerFAIDS.

**Late Disbursements**
If no disbursement has been made for the student and a valid ISIR is received during the period of enrollment, the calculation for Pell will be what the student was enrolled in at the census date. However, if the valid ISIR is received in a subsequent term, the calculation will be made on the completed coursework in the prior term.

**Optional Recalculations**
Change in enrollment status within a term
Students who change enrollment status after the census date will not have their Pell Grant funds recalculated.

Change in Cost of Attendance
A change in cost of attendance during a payment period will not cause a recalculation of Pell Grant funds; however, a recalculation will be completed if the cost of attendance changes between payment periods.

**PART 6.3 FISCAL RECORDS AND DISBURSEMENTS REQUIREMENTS** (From Part 1.5)
**Fiscal Reports and Financial Statements**
The Financial Aid Office emails reports that document all financial aid transactions to the Business Office. The Business Office will post to the General Ledger after they receive confirmation of the G5 drawdown (from the Office of Business Affairs) and the bank statement; showing the funds have been deposited into the bank account. Each Title IV program has their own General Ledger account number which documents individual transactions. These accounts are reconciled on a monthly basis.

The Bursar applies the proper tuition, fees, and any other charges the student is expected to pay to the student’s Accounts Receivable. Subsequent the disbursement of financial aid to the student account the Bursar forwards a list of student refund recipients and amounts to the Business Office for check drafting. Once completed, the checks are returned to the Bursar. The Bursar sends refund checks via regular mail them to the current address on file. Students requesting to pick up checks directly from the bursar, or an early refund must complete an Emergency Check Release.

**Retention of Required Records**
Paper Records are maintained for a period of 5 years; electronic records are kept indefinitely. Listing of required records:

- Institutional Student Information Record (ISIR)
- ISIR changes
- Verification paperwork
- Award Letter
- Software reports (PowerFAIDS, Jenzabar, Microsoft Office)
General Requirements
LCOOC maintains the required records in an organized manner with identifying labels for easier access. The records will be made available to the Secretary or their authorized representative upon request. All records can be reproduced in hard copy if needed.

Examination of Records
LCOOC will cooperate with independent auditors, the Secretary, the Department of Education Inspector General, and the Comptroller General of the United States or their authorized representatives in the conduct of audits, investigations, program reviews, or other reviews authorized by law.

The cooperation includes timely access for examination and copying requested records. And, reasonable access to personnel associated with administration of the Title IV programs to obtain relevant information.

PART 6.4 DISBURSEMENTS FOR BOOKS AND SUPPLIES
Because LCOOC disburses Title IV funding several weeks after the semester has begun, eligible students can receive a Textbook Authorization Form to use in purchasing their books from the college virtual bookstore. Textbook Authorization Forms are available in the Financial Aid Office.

For those students who want to purchase their books elsewhere, they can find the ISBN number at our website www.lco.edu and use the vendor of their choice.

PART 6.5 IRAQ AND AFGHANISTAN SERVICE GRANT
An otherwise Pell-eligible student whose parent or guardian died as a result of U.S. military service in Iraq or Afghanistan after September 11, 2001, may receive increased amounts of federal student aid if the student was less than 24 years old when the parent or guardian died, or was enrolled at an institution of higher education at the time of the parent or guardian’s death. Those eligible students will show up on the student SAR or the institution’s ISIR with a “DoD Match Flag” and the comment code 298.

There are two different provisions for such students, depending on whether the student has an EFC that falls within the range for Pell eligibility or not.

Zero EFC treatment for children of soldiers:
LCOOC must use an EFC of 0 to package all federal student aid if the student meeting the above criteria has a Pell-eligible EFC. (Note that the zero EFC is only used for packaging purposes; we do not actually change the student’s calculated EFC.)

When submitting an origination to COD for a student of this type, we include the CPS transaction containing the Department of Defense Match Flag set to “Y,” or the award will not be accepted.

A student with an EFC that is not Pell eligible is potentially eligible to receive an award under the Iraq & Afghanistan Service Grant program.

**Iraq & Afghanistan Service Grant program:**
To receive the Iraq & Afghanistan Service Grant, the student must have an EFC that is not Pell eligible. (The student must meet the other criteria for Pell eligibility.) The amount of the award is the same as the maximum Pell grant, adjusted for the student’s enrollment status and cost of attendance. All other Title IV aid is awarded based on the student’s calculated EFC.

Due to the sequester, all Iraq & Afghanistan Service Grant award amounts first disbursed on or after October 1, 2014 and before October 1, 2015 must be reduced by 7.3%. For example, a student otherwise eligible for a Grant of $6,345 (the maximum Scheduled Award for 2020-21) the grant would be reduced by $444.94 resulting in a grant of $5,900.06.

When submitting an origination to COD for a student receiving an Iraq and Afghanistan Service Grant, we include the CPS transaction containing the DoD Match Flag set to “Y,” or the award will not be accepted. The award may not exceed the student’s cost of attendance. Iraq and Afghanistan Service Grants are not considered Estimated Financial Assistance for packaging purposes.

These are two ways to receive a SAR (Student Aid Report)
3. Either electronically from the EDE changed to PowerFAIDS system, or
4. Student may bring in a hard copy.

When SAR is received the financial aid staff must check the following information.
7. Expected Family Contribution (EFC).
8. * By EFC (flagged to be verified).
9. C by EFC means student has eligibility problem and requires resolution.
10. Review any items in boldface type on part 2 and to do resolution if required.
11. Check student name and social security number.
12. Conflicting documentation must be corrected and SAR should be returned for corrections if the EFC changes because of corrected information.

If the SAR is flagged the student must complete a verification worksheet and submit copies of the relevant IRS transcript if the IRS Data Retrieval Tool was not used. The following six types of information must be verified:
8. Household size.
10. Adjusted Gross Income.
11. Earned income from a W-2 if not required to file taxes but received a W-2.
13. Other untaxed income not reported, such as workers compensation disability, etc:
   Except:
   b. Student aid
   c. Foreign income exclusion.
   d. Earned income credits.
14. Any other information that may be needed such as legal separation or divorce papers.

Students will be notified of the information they must submit by either student email account or by mail. No Federal Pell funds will be disbursed to a student until the verification process has been completed. The Financial Aid Department must report all changes and corrections to the Federal Pell system.

OVER AWARDS
The financial aid office must monitor each student’s financial aid award to insure the student is not over awarded. If a student is over awarded, the director must reduce the students awards by the amount of the over award. There is a $300 tolerance for any Campus-Based over-awards. All other over-awards must be closely monitored in each student’s package by ensuring their financial need does not exceed the cost of attendance.

RECONCILIATION
After the end of each month, the Financial Aid Director, Business Office Manager and Office of Sponsored Programs Director will submit their documentation to reconcile Title IV disbursements.
The reconciliation will tie out the following documents and explain any variances at a student level for correction prior to the next reconciliation meeting.
- The cash activity report from the COD system
- The disbursement register from the G5 reporting system
- The award detail by fund report from the PowerFAIDS system
- A general ledger detail report from the Jenzabar accounting system

AGREEMENTS BETWEEN SCHOOLS
SECTION 7
Two or more institutions may enter into a consortium or contractual agreement so that a student can continue to receive FSA funds while studying at a school or organization other than his or her “home” institution. (The home school is the one that will grant the student’s degree or certificate.)

Under a consortium or contractual agreement (including those for study abroad programs), the home school must give credit for the courses taken at the other school(s) on the same basis (in terms of instructional time) as if it provided that portion itself. The underlying assumption of the agreement is that the home school has found the other schools or organizations academic
standards to be equivalent to its own, and a completely acceptable substitution for its own instruction.

However, a home school may decline to give credit for courses in which a student earns a grade of “D” at the other school. Although a home school has a policy of accepting grades of “D” or above earned at the home school, it does not have to accept credits earned for courses at the other school for which a student earns a “D”.

Grades received through either a consortium or contractual agreement does not have to be included in the calculation of the student’s grade point average (GPA).

**PART 7.1 CONSORTIUM AGREEMENT**

A consortium agreement, which can exist between eligible schools only, can apply to all the FSA Programs. Under such a written agreement, students may take courses at a school other than the “home” institution (the school where the student expects to receive a degree or certificate) and have those courses count toward the degree or certificate at the home school.

**Elements of the Consortium Agreement**

There is no limit on the portion of the eligible program that may be provided by eligible schools other than the home school. Agreement contents can vary widely and will depend upon the interests of the schools involved and the accrediting or state agency standards. The Department does not dictate the format of the agreement (which can be executed by several different offices) or where the agreement is kept. However, certain information should be included in all agreements, such as which school will grant the degree or certificate, what the student’s tuition, fees, and room and board costs are at each school, and what the student’s enrollment status will be at each school. The agreement should also specify which school will be responsible for disbursing aid and monitoring student eligibility and should include the procedures for calculating awards, disbursing aid, monitoring satisfactory progress and other student eligibility requirements, keeping records and distributing FSA refunds. Usually, the home institution is responsible for disbursements, but if the student is enrolled for a full term or academic year at the host institution, it may be easier for the host institution to monitor the student’s eligibility and make payments. The school paying the student must return FSA funds if required (for example, in refund or overpayment situations).

**Effective Date of the Agreement**

The agreement becomes effective for the payment period in which it is signed; however, it can be retroactive to a previous payment period if the payment period is in the same award year. Thus, if an agreement is signed in the middle of the spring semester, the student can be paid for the entire award year, including the preceding fall semester.

**PART 7.2 CONTRACTUAL AGREEMENT**

A contractual agreement is between eligible and ineligible schools or organizations. Under such an agreement, the ineligible school or organization provides, under written contract, a portion of the eligible school’s educational program.

There is a limit on the portion of the program that can be given at the ineligible school. If both the home and ineligible schools are owned or controlled by the same individual, partnership, or
corporation, the ineligible school can provide no more than 25% of the educational program. If the two schools are separately owned or controlled, the ineligible school can provide up to 50% of the educational program. However, in the case of separately owned schools, if the contracted portion is more than 25% of the program, the home school’s accrediting agency or state agency (in the case of a public postsecondary vocational institution) must determine and confirm in writing that the agreement meets its standard for contracting out education services. Under a contractual agreement, the eligible school is always the home school. The home school performs all the aid processing and delivery functions for its students attending the ineligible school or organization.

FINANCIAL AID COMMITTEES
SECTION 8

The Financial Aid Appeal Committee is currently comprised of four members that include:
- Financial Aid Director
- Dean of Students
- TRiO/SSS Director
- Director of Enrollment/Learning Center Program Coordinator

The responsibility of this committee is to review financial aid suspension appeals and determine student financial aid eligibility according to SAP policies. To approve a financial aid appeal, all four committee members must be present and come to an agreement on final decision along with conditions set forth.

The Scholarship Committee is currently comprised of four members that include:
- Financial Aid Director
- Project Success Coordinator/Transition Advisor
- English Faculty Member
- TRiO/SSS Assistant Director

The responsibility of this committee is to review and select recipients of various scholarships that LCOOC students apply/are eligible for. The Scholarship Committee will review anonymous student applications and essays and score them accordingly to a rubric created.

Committee meetings will be scheduled on an as needed basis or when special meetings are deemed necessary.

Appendix A
Segregation of Duties

<table>
<thead>
<tr>
<th>EMPLOYEE RESPONSIBLE:</th>
<th>FIN. AID DIRECTOR</th>
<th>FIN. AID ASSIST.</th>
<th>CFO</th>
<th>ACCTS. PAYABLE</th>
<th>ACCTNG. CLERK</th>
<th>BURSAR</th>
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<tbody>
<tr>
<td>TASKS</td>
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<tr>
<td>DOE SOFTWARE</td>
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<tr>
<td>ENTER STUDENT APP.</td>
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<tr>
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<td>X</td>
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<tr>
<td>REVIEW ISIR</td>
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<td>TO STUDENT (IF NEEDED)</td>
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<td>REQUIRES DOCUMENTS</td>
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<tr>
<td>REVIEW DOCUMENTS</td>
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</table>

**AWARDING PROCESS**

| DETERMINES STUDENT ELIGIBILITY | X |
| DETERMINES SCHEDULE OF AWARDS | X |
| PREPARES AWARD LETTER | X |
| REVIEWS AWARD LETTER | X |
| MAILS AWARD LETTER | X |

**DISBURSEMENT PROCESS**

| INPUTS A 1P INTO THE UNIVS SYSTEM TO DISBURSE | X |
| RUNS A TRIAL FAM 14 RPT | X | X |
| RUNS A FINAL FAM 14 RPT | X | X | X |
| DISBURSES TO STUDENT ACCOUNTS | X | X |
| PREPARES DISBURSEMENT LIST | X | X |
| INPUTS STUDENT DISBURSEMENT AMOUNTS | X |
| RUNS STUDENT CHECKS | X |
| PUTS CHECKS THROUGH SIGNER | X |
| ENTERS CHK NUMBERS, NAME, AND AMOUNTS INTO THE UNIVS SYSTEM | X |
| DISTRIBUTES STUDENT CHECKS | X | X |

**TITLE IV FUNDS**

| REPORTS ORIGINATION RECORD TO DOE | X | X |

**EMPLOYEE RESPONSIBLE:**

<table>
<thead>
<tr>
<th>REPORTS DISTRIBUTION RECORD TO DOE</th>
<th>FIN. AID DIRECTOR</th>
<th>FIN. AID ASSIST.</th>
<th>CFO</th>
<th>ACCTS. PAYABLE</th>
<th>ACCTNG. CLERK</th>
<th>BURSAR</th>
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<tr>
<td>X</td>
<td>X</td>
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| REQUESTS FUNDS FROM GAP USING FAM 14 RPT | X |
| RECONCILES GENERAL LEDGERS | X | X |

**OTHER FA RECEIVED**

<p>| INPUTS A 1P INTO THE UNIVS SYSTEM | X | X |
| RUNS A TRIAL FAM 14 RPT | X | X |
| RUNS A FINAL FAM 14 RPT | X |</p>
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<th>Activity</th>
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<td>PREPARES/DISBURSES STUDENT CHECKS</td>
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<td>DEPOSITS CHECKS FROM AGENCIES</td>
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<td>REVIEWS APPLICATIONS</td>
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<td>AUTHORITY TO FIRE AFTER INITIAL HIRING</td>
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<td>AWARDS WORK STUDY BASED ON UNMET NEED</td>
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<td>NOTIFIES STUDENT, BUS. OFFICE &amp; SUPERVISOR</td>
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<td>ENTERS AWARD/CONTRACT AMT. INTO UNIVS SYSTEM</td>
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</tr>
<tr>
<td>PROCESS WKLY PAYROLL</td>
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<td>X</td>
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<tr>
<td>PUTS THROUGH CK SIGNER</td>
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<td>X</td>
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<tr>
<td>ENTERS CK NUMBERS, NAME, &amp; AMOUNT INTO THE UNIVS SYSTEM</td>
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<td>X</td>
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<tr>
<td>DISTRIBUTES CK TO EMPLOYEE</td>
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<td>X</td>
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<tr>
<td>RETURN OF TITLE IV FUNDS</td>
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<td>ENROLLMENT REPORTING</td>
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<td>R2T4 CALCULATIONS</td>
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<td>FUNDS RETURN</td>
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**Appendix B**

**EXAMPLE OF DETERMINING FINANCIAL NEED AND SAMPLE AID PACKAGE**

Packaging is the process of determining financial need and awarding the student the Federal Pell Grant if student is eligible. The Federal Pell Grant is the base award. This process is started when a student financial aid file is complete.

A student’s financial need is determined by taking the appropriate cost of attendance budget and subtracting the effective family contribution or EFC. The EFC is printed on the Student Aid Report (SAR). The difference is the student’s financial need. The financial need may be calculated on the appropriate software system.
Student need and sample packaging:

1. Cost of attendance $8000  
   EFC $2000  
   Need $6000

2. Financial Aid offered  
   Federal Pell $2000  
   FSEOG $500  
   FWS $1000  
   Tribal Scholarship $1000  
   Total Aid offered $4500

3. Cost of attendance $8000  
   EFC -$2000  
   Aid offered -$4500  
   Unmet need $1500

Packaging Policy Sample

I. Packaging Policy  
   Once a Financial Aid file is complete and need is determined, the following packaging process will be followed:  
   1. Check for academic progress (See Academic Progress Standards).  
   2. Determine if a student is Pell eligible. If eligible, determine Pell award amount based on EFC and enrollment status. List the Pell amount on the award letter and subtract that amount from the need.  
   3. If there is remaining need after Pell is applied, package Federal Supplemental Educational Opportunity Grant to Pell eligible students on a first come/first serve basis. First consideration will be to students with a zero EFC.  
   4. If a student applies for Federal Work Study and it is determined there is a need after Pell and FSEOG is awarded, Federal Work Study funds can be awarded.  
   5. If there is remaining need, a student will be eligible for additional state or outside scholarships up to the student’s determined need.

All Title IV awards must be disbursed according to Federal Title IV Regulations. Federal financial aid awards will be based on the total Title IV funds provided to the college by the Department of Education. There may be differences in actual disbursed amounts based on documented circumstances.