
Policy Name: Federal Financial Aid Administration
Policy Number: ADM 4.01
Title of Policy Owner: Chief Financial Officer
Policy Type: RHEI/Shared Services BSMCON SCHS SOMI
Approved by: RHEI Leadership Team
Effective Date: 8/1/2024
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Policy Status: Approved

I. Policy

It is the policy of Bon Secours St. Mary's Hospital School of Medical Imaging (SOMI), which provides higher education in radiologic technology, to administer federal financial aid programs in accordance with the requirements of Title IV - Higher Education Act of 1965, as amended (Title IV Regulations).

II. Purpose

The purpose of this policy is to establish roles and responsibilities, internal controls, procedures, and deadlines for the participation in Title IV Financial Aid programs. Continued access to Title IV Financial Aid funds is a vital resource for SOMI students as a means to finance their education. SOMI is committed to ensuring compliance with Title IV Regulations so that access to Title IV programs is not jeopardized.

III. Scope

This is an institutional policy that applies to all SOMI Associate Degree students.

IV. Definitions

Administrative Capability – is how SOMI provides reassurance to the U.S. Department of Education (ED) that it is capable of administering Title IV Financial Aid funds with regards to requirements listed in 34 CFR § 668.16.

Business Office - collectively refers to Director of Finance, Bursar and Senior Accountant, who are responsible for the timely and accurate maintenance of Student Accounts, fiscal reporting requirements and reconciliation of Title IV Financial Aid funds.

Cost of Attendance (COA) – is the anticipated cost that a student may incur during an academic year to attend college. COA typically includes costs for Tuition and Fees, books, course materials, supplies & equipment, living expenses, transportation, personal and professional credential (i.e., AART) expenses. COA does not reflect the actual charges that a student will incur. COA is published annually in the SOMI School Catalog and on the website.

Enrollment Intensity – is the percentage of Full-Time enrollment for which the student is enrolled, rounded to the nearest whole percent, in any given Semester. SOMI considers Full-Time enrollment as twelve (12) or more credits per Semester. Beginning with the 2024-25 Academic Year, Enrollment Intensity (not Enrollment Status) is used in the calculation of a student's Federal Pell Grant award. Enrollment Intensity only applies to Federal Pell Grant eligibility.

FAFSA Processing System (FPS) – is the U.S. Department of Education's (ED) application data processing center. FPS processes information from the Free Application for Federal Student Aid (FAFSA) and produces two (2) reports: FAFSA Submission Summary (FSS) which is distributed to students and Institutional Student Information Record (ISIR) distributed to institutions (SOMI). FPS replaces Central Processing System (CPS) beginning with the 2024-25 Academic Year in accordance with the FAFSA Simplification and/or FUTURE Acts, as amended.

FAFSA Submission Summary (FSS) - is a summary of information from the student's FAFSA submission. The student receives a FSS, and the institution (SOMI) receives an Institutional Student Information Record (ISIR). FSSs and ISIRs contain the same information in different formats. FSS replaces the Student Aid Record (SAR) beginning with the 2024-25 Academic Year in accordance with the FAFSA Simplification and FUTURE Acts, as amended.

Federal Pell Grant – is a federal grant that provides Need-based funds to low-income undergraduate and certain post-baccalaureate students to promote access to postsecondary education. Beginning with the 2024-25 Academic Year in accordance with the FAFSA Simplification and/or FUTURE Acts, as amended, students may qualify for a Federal Pell Grant in one (1) of three (3) ways 1. Maximum Pell Grant (Max Pell), 2. Minimum Pell Grant (Min Pell), or 3. Calculated Federal Pell Grant. Federal Pell Grant award amounts are dependent on the student's SAI, COA, Enrollment Intensity and whether the student attends for a full Academic Year or less. Year-Round-Pell is offered to students who meet certain eligibility requirements.

Financial Aid – is any source of financial funding to defer a student's Cost of Attendance (COA). Examples of Financial Aid may include, but are not limited to, Title IV Financial Aid (Federal Pell Grant and Federal Direct Loans (Subsidized, Unsubsidized and Parent PLUS), Scholarships, Third Party Payors, etc.

Financial Aid Office - collectively refers to the Director of Financial Aid, Financial Aid Specialist and Financial Aid Counselor, who are responsible for the timely and accurate awarding, scheduling, and reconciliation of Financial Aid.

Financial Refund - denotes that some form of payment has taken place between the student (or related party initiated by or on the behalf of the student) and SOMI for

which a subsequent event occurs that results in the payment being returned to the student (or related party), as further defined in ADM 5.01 Financial Refund policy.

Institutional Eligibility – refers to the establishment and maintenance of eligibility of an institution (SOMI) to be permitted to administer Title IV Programs as established in 34 CFR § 668.16.

Institutional Student Information Record (ISIR) – is a summary of information from the student's FAFSA submission. ISIRs and FSSs contain the same information in different formats.

Professional Judgement - is a provision of law under Title IV – Higher Education Act of 1965, as amended, that allows Financial Aid administrators to make adjustments to Financial Aid eligibility based on a student's special circumstance(s). Professional Judgement is categorized into 1) Special Circumstances in which a financial situation (i.e. loss of a job) justifies the Financial Aid administrator to adjust certain elements in the COA or SAI calculation and 2) Unusual Circumstances in which a condition exists that justifies the Financial Aid administrator to adjust a student's dependency status (from dependent to independent) based on unique situations (i.e. human trafficking, refugee or asylee status, parental abandonment, incarceration, etc.), which is commonly referred to as a dependency override. Instances of Professional Judgement are rare and additional documentation is required.

Semester – is the standard measurement used to group weeks of instructional time in the academic year. Semester is generally referred to as period of enrollment and includes fall, spring, and summer. For purposes of Title IV Financial Aid, Semester is the term also denoting a Payment Period.

Student Accounts - collectively refers to a student specific record of all pending, scheduled or posted financial transactions over the duration of program enrollment. Student Accounts generally refers to transactions contained within the Registration Bill (generally pending or anticipated transactions) and Student Ledger Card (posted transactions). Further information can be obtained in ADM 4.04 Student Accounts policy.

Student Aid Index (SAI) – is an eligibility index number that is used to determine the financial resources available to contribute to a student's postsecondary education expense. SAI is calculated by the U.S. Department of Education (ED) FAFSA Processing System (FPS) based on formulas that are established by law. SAI is calculated from information submitted in the Free Application for Federal Student Aid (FAFSA), and federal tax information (FTI) that is retrieved directly from the Internal Revenue Service (IRS). SAI is reported to the student on the FAFSA Submission Summary (FSS) and to SOMI via the Institutional Student Information Record (ISIR).

SOMI uses the SAI, among other information, to determine Financial Aid eligibility and the amount for such award(s). SAI is not the amount of money that a student (or family) will, or is expected to, pay, nor is it the amount of Financial Aid that a student will receive. SAI replaces Expected Family Contribution (EFC) beginning with the 2024-25 Academic Year in accordance with the FAFSA Simplification and/or FUTURE Acts, as amended. Unlike EFC, SAI may be a negative number, as low as (\$1,500).

Title IV Credit Balance – is a negative (credit) balance that occurs when there is an excess of Title IV Funds when applied to Tuition and Fees (or Other Charges) assessed to the Student Account within a Semester.

Title IV Financial Aid – is federal Financial Aid authorized by Title IV of the Higher Education Act of 1965, as amended. Title IV Financial Aid programs that SOMI participates in includes Federal Pell Grant and Federal Direct Loans (Subsidized, Unsubsidized and Parent PLUS).

Title IV Regulations – are requirements imposed under Title IV of the Higher Education Act of 1965, as amended that institutions must comply with to participate in Title IV programs. Title IV Regulations include, but are not limited to, the FAFSA Simplification and FUTURE Acts, as amended, which were predominantly implemented during the 2024-25 Academic Year.

Verification – is the process by which an applicant's FAFSA information is selected by FPS or SOMI to be verified as accurate (true and complete within certain parameters) or inaccurate, as further defined by ADM 4.03 Federal Financial Aid Verification and Conflicting Data policy.

V. Policy Details

A. Designation of a Responsible Party

The Chief Financial Officer is responsible for monitoring compliance with the requirements of this policy and applicable Title IV Regulations.

B. Institutional Eligibility

SOMI is a postsecondary educational institution that is approved to participate in student financial assistance programs authorized by Title IV of the Higher Education Act of 1965, as amended. As such, SOMI must maintain Institutional Eligibility and demonstrate Administrative Capability in order to maintain access to and participate in Title IV programs. Further, SOMI understands and agrees to comply with all Title IV (and other) Regulations including, but not limited to, general provisions and regulations as set forth in 34 CFR Part 600, Parts 668-690.

SOMI entered into a Program Participation Agreement (PPA) with the United States Secretary of Education to administer Title IV programs offered by the U.S. Department of Education (ED) and is subject to the terms and conditions set forth in that agreement. The PPA applies to all locations and programs that are indicated on the most current Eligibility and Certification Approval Report (ECAR) issued by the ED. The Chief Financial Officer is responsible for updating, maintaining, and retaining ED agreements and reports. SOMI utilizes FSA Partner Connect to update its eligibility application and related documentation that is filed with the ED and retains such documentation in accordance with Title IV Regulations and ADM 1.04 Records Management policy.

C. Administrative Capability

SOMI is required to exhibit and maintain Administrative Capability with respect to Title IV programs. These provisions include, but are not limited to, maintaining an adequate number of qualified persons to administer Title IV Financial Aid, demonstrating adequate checks and balances, establishing publishing, and applying reasonable standards with respect to Satisfactory Academic Progress (SAP), resolving Conflicting Data, preparing, and submitting fiscal reports and financial statements and providing Financial Aid counseling for students.

The Finance team is comprised of the Chief Financial Officer, who oversees the Financial Aid Office and Business Office. As such, the Chief Financial Officer annually evaluates the number of associates within each office to ensure that adequate staffing is maintained, sufficient training and education opportunities with respect to Title IV Regulations is provided and that associates possess sufficient knowledge in order to ensure compliance with Title IV Regulations related to Administrative Capability. While both the Financial Aid Office and Business Office play an integral part in maintaining compliance with Title IV Regulations, there is separation of duties with respect to each office, as well as internal controls in existence to further ensure that proper checks and balances exist.

In accordance with Title IV Regulations, students must maintain Satisfactory Academic Progress (SAP) in order to maintain access to Title IV Financial Aid. SAP, as it relates to Title IV Financial Aid eligibility, is discussed in detail, and further outlined in ADM 2.06 Satisfactory Academic Progress (SAP) policy. As an administrator of Title IV Financial Aid programs, the SOMI Financial Aid Office is required to identify and resolve any discrepancies in information, also referred to as Conflicting Data, that it receives from various sources with respect to a student's application for and/or eligibility to receive Title IV Financial Aid. In addition, FPS and/or the Financial Aid Office may require that a process called Verification be completed prior to awarding Title IV Financial Aid. Further, the Financial Aid Office is

required to clear any comment (C) codes or flags as indicated on the Institutional Student Information Record (ISIR) for items such as citizenship, prior student loan default, unusual enrollment history (UEH), etc. in accordance with Title IV Regulations prior to awarding Title IV Financial Aid. The ADM 4.03 Federal Financial Aid Verification and Conflicting Data policy further outlines such circumstances.

The Business Office is responsible for the accurate and timely maintenance of fiscal and cash management records. Fiscal responsibility activities include, but are not limited to, maintaining all elements that comprise Student Accounts as further defined in ADM 4.04 Student Accounts policy, processing Financial Refunds in accordance with ADM 5.01 Financial Refunds policy, submitting annual financial statements and compliance audits via the ED's FSA Partner Connect system, maintaining appropriate documentation with regards to the receipt and expenditures of Title IV Financial Aid funds, reconciling Title IV Financial Aid funds, etc. The Business Office retains records as further described in ADM 1.04 Records Management policy.

VI. Attachments

None

VII. Related Policies

ADM 1.04 Records Management
ADM 2.06 Satisfactory Academic Progress
ADM 4.02 Federal Financial Aid Programs
ADM 4.03 Federal Financial Aid Verification and Conflicting Data
ADM 4.04 Student Accounts
ADM 4.06 Book Voucher
ADM 5.01 Financial Refunds

VIII. Disclaimers

Nothing in this policy creates a contractual relationship between Bon Secours St. Mary's Hospital School of Medical Imaging (SOMI) and any party. SOMI, in its sole discretion, reserves the right to amend, terminate or discontinue this policy at any time, with or without advance notice.

IX. Version Control

Version	Date	Description	Prepared by
1.0	08/01/2022	Establish AAS Policy	Chief Financial Officer

2.0	08/02/2023	New template. Revisions to Definitions for COA and PJ	Chief Financial Officer
3.0	08/01/2024	Revisions and updates to definitions and processes related to the FAFSA Simplification and/or FUTURE Acts, as amended	Chief Financial Officer