

Policy Name: Establishing Principles of Excellence - Military
Policy Number: ADM 4.07
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
Version: 3.0
Policy Status: Approved

I. Policy

It is the policy of Bon Secours St. Mary's Hospital School of Medical Imaging (SOMI) to offer and administer U.S. Department of Veteran Affairs education benefits in accordance with federal and state regulations.

II. Purpose

The purpose of this policy is to establish roles and responsibilities, internal controls, procedures and deadlines for the participation and administration of U.S. Department of Veteran Affairs education benefit programs. SOMI acknowledges the importance of providing meaningful information to service members, veterans, spouses and other family members about the financial cost and educational quality of its programs and to ensure the administration of such Veteran Affairs education benefits in accordance with applicable federal and state regulations and Principles of Excellence for Educational Institutions.

III. Scope

This is an institutional policy that applies to all SOMI prospective and enrolled students utilizing U.S. Department of Veteran Affairs education benefits.

IV. Definitions

Date of Determination (DOD) – as determined by the Director of Records and Registration and recorded in the Student Information System (SIS) as the date which the Director of Records and Registration receives written communication from the student or electronic notification via the SIS that the student has dropped/withdrawn from a course(s) or permanently resigned from SOMI. The DOD that a student withdrew should be no more than fourteen (14) calendar days after the student's LDA as determined by the institutions records within the SIS.

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.

Last Date of Attendance (LDA) – as determined by the Director of Records and Registration and recorded in the Student Information System (SIS), is the last date of an academically-related activity in a course, such as attendance in a course, or completion and submission of a course assignment, exam, tutorial, clinical experience, skills lab, or simulation experience.

School Certifying Official (SCO) - is a representative of an educational institution or training establishment who is authorized to submit enrollment certification to DVA (U.S. Department of Veterans Affairs) for Veteran Affairs education benefits.

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 is generally referred to as transactions contained within the Registration Bill (generally pending or anticipated transactions) and Student Ledger Card (posted transactions).

Student Information System (SIS) – is the information system used to manage and/or administer student data including, but not limited to, application, admission, registration, Financial Aid, Student Accounts, academic records, etc.

Third Party Payor – is an entity that remits payment to SOMI on behalf of a student. Examples of a Third-Party Payor include, but are not limited to, VA529 Plans, Veteran Affairs, employer provided tuition benefit plans such as EdAssist, UPS, Bon Secours Mercy Health (BSMH) Tuition Benefits, etc.

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 Financial Aid 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.

V. Policy Details

A. Designation of a Responsible Party

With appropriate oversight by the Chief Financial Officer, the Director of Financial Aid is responsible for monitoring compliance with the requirements of this policy and applicable U.S. Department of Veteran Affairs regulations. The Director of Financial Aid serves as the School Certifying Official (SCO) for Veteran Affairs education benefits.

B. Principles of Excellence – Military: Executive Order

On April 27, 2012, President Obama signed Executive Order 13607. This executive order encourages institutions of higher education to recognize the importance of

transparency when providing students with outcome measurements, financial disclosure documents and enhanced enforcement and compliance mechanisms.

Bon Secours St. Mary's Hospital School of Medical Imaging (SOMI) agrees to comply with the Principles of Excellence Order and commits to:

- i. Prior to Enrollment
SOMI will provide prospective students who are eligible to receive federal military and veterans educational benefits (Veteran Affairs educational benefits) with a personalized and standardized form, as developed in a manner set forth by the U.S. Secretary of Education, working with the Secretaries of Defense and U.S. Department of Veterans Affairs, to help those prospective students understand the total cost of the educational program, including tuition and fees; the amount of that cost that will be covered by Veteran Affairs education benefits; the type and amount of federal financial aid they may qualify for; their estimated student loan debt upon graduation; information about student outcomes; and other information to facilitate comparison of aid packages offered by different educational institutions. The Financial Aid Shopping Sheet provides personalized award information to all prospective and enrolled students. It is provided electronically via the Student Information System (SIS).
- ii. Federal Financial Aid Fund Sources
The SCO will inform students who are eligible to utilize Veteran Affairs education benefits of all fund sources available to finance their education including Veteran Affairs education benefits and other federal financial aid fund sources, as further defined in ADM 4.02 Federal Financial Aid Programs. The SCO will inform and review potential federal financial aid fund sources with the student prior to packaging financial aid and will exhaust all federal fund sources prior to offering private student loans or alternative fund sources.
- iii. Recruiting Techniques
SOMI does not use aggressive or fraudulent recruiting techniques, as well as misrepresentation, payment of incentive compensation and is committed to meeting federal and state authorization requirements, consistent with the regulations issued by the U.S. Department of Education (34 C.F.R. 668.71-668.75, 668.14, and 600.9)
- iv. Compliance with Federal, State and Local Regulatory and Accreditation Standards Requirements
SOMI attests to ensuring compliance with regulatory and accrediting standards including, but not limited to Title IV Regulations, institutional and programmatic accrediting standards and other federal, state and local regulatory requirements that govern its academic programs. This includes, but is not limited to, regulatory and accrediting body approval of any substantive changes in educational programming or course offerings.
- v. Enrollment Status Changes

SOMI policy allows for temporary leaves of absences for service members and reservists who are called to active duty and/or those who must permanently withdraw from the institution due to military service orders. In such circumstances, SOMI allows for readmission for those students meeting Satisfactory Academic Progress standards as further defined in ADM 2.06 Satisfactory Academic Progress policy. Students are also required to review ADM 3.07 Leave of Absence or Permanent Resignation from the School and ACA 2.04 Re-Admissions policies in such circumstances.

vi. Financial Refunds

A 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). The U.S. Department of Veteran Affairs, including the U.S. Department of Defense, are treated as Third Party Payors (related party).

Veteran Affairs education benefits are awarded and paid on the student's behalf under the assumption that the student will remain enrolled for the entire Semester in which education benefits are received. In the event that a student who utilizes Veteran Affairs education benefits including, but not limited to, Military Tuition Assistance (MTA) withdraws from a (or all) course(s), is approved for a Standard Period of Non-Enrollment (SPN), or permanently resigns from SOMI after completion of the Add/Drop Period, but prior to the sixty (60) percent completion of the Semester, a Financial Refund of a pro rata share of Tuition and Fees will be returned to the Third Party Payor in accordance with the Refund Schedule outlined below. Further, all Financial Refund dates are published annually in the SOMI School Catalog. Students must follow ADM 3.07 Leave of Absence or Permanent Resignation from the School and/or ADM 3.08 Add/Drop/Withdrawal from a Course policies in conjunction with this policy, ADM 5.01 Financial Refunds and ADM 4.04 Student Accounts policies.

The percentage of Semester completed is calculated by taking the number of completed calendar days up to and including the Date of Determination (DOD) divided by the total number of calendar days in the Semester, less any scheduled breaks of five (5) or more consecutive calendar days.

Percentage of Semester Completed as of Date of Determination (DOD)	Estimated Week # of the Semester	Percentage of Tuition and Fees Refunded
Less than 10%	Week 2 (Fall, Spring & Summer)	90% Refund
10% up to but not including 20%	Week 3 (Fall & Spring) Week 2 (Summer)	80% Refund
20% up to but not including 30%	Weeks 4-5 (Fall & Spring) Week 2-3 (Summer)	60% Refund
30% up to but not including 40%	Weeks 5-7 (Fall & Spring) Week 3 (Summer)	40% Refund
40% up to but not including 60%	Weeks 7-10 (Fall & Spring) Weeks 4-5 (Summer)	20% Refund

60% or more	Week 11+ (Fall & Spring) Week 6+ (Summer)	No Refund
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Should a student, who is also a military service member, cease enrollment for any period of time within a Semester(s) due to military service, and provide supporting documentation, SOMI will ensure that there is no financial obligation to the student.

vii. Degree Audit Plan

SOMI provides degree audit plans electronically via the Student Information System (SIS) for all students, including those utilizing Veteran Affairs education benefits. This detailed plan outlines how students fulfill their educational requirements that are necessary to graduate from the program and the expected timeline for completion. In certain cases, previous coursework from other accredited institutions and relevant military training may be evaluated for transfer credits. Additional details are located in ADM 3.01 Transfer Credit policy.

viii. Point of Contacts for Student Success

SOMI offers various forms of student services to ensure student success. Such services include, but are not limited to:

Academic & Career Advising - which includes access to academic counseling, accommodations counseling, and career counseling to assist service members, reservists, and their families with the successful completion of their educational programs and assistance with subsequent job placement.

Financial Advising – which includes financial aid counseling and other services as provided by the Financial Aid Office and/or SCO.

C. Financial & Academic Penalties

In accordance with Title 38 US Code 3679(e), SOMI adopts the following additional provisions for any students using Post-9/11 GI Bill® (Ch. 33) or Vocational Rehabilitation & Employment (Ch. 31) benefits, while payment to the institution is pending from Veteran Affairs education benefits. SOMI will not:

- Prevent the student's enrollment;
- Assess a late penalty fee to the student;
- Require the student to secure alternative or additional funding;
- Deny the student access to any resources (access to classes, libraries, or other institutional facilities) available to other students who have satisfied their tuition and fee bills to the institution.

However, to qualify for this provision, such students may be required to:

- Produce the VA Certificate of Eligibility (COE) by the first day of class;
- Provide a written request to be certified;
- Provide additional information needed to properly certify the enrollment as described in other institutional policies

D. Grievances

The Virginia State Approving Agency (SAA) is the approving authority for U.S. Department of Veteran Affairs education benefits and training programs for the state of Virginia. In the event that a student receiving Veteran Affairs education benefits has a grievance against SOMI, the student should first follow the procedures set forth in ADM 1.05 Appeal Process for Non-Academic Student Grievances policy. In the event that the grievance cannot be satisfactorily resolved, the student may file such a grievance with the SAA office at saa@dvs.virginia.gov.

REFERENCE: Executive Order 13607; Dear Colleague Letter: GEN-12-17 (Publication Date August 30, 2012)

GI Bill® is a registered trademark of the U.S. Department of Veterans Affairs (VA).

VI. Attachments

None

VII. Related Policies

- ADM 1.05 Student Grievance Process
- ADM 2.06 Satisfactory Academic Progress (SAP)
- ADM 3.07 Leave of Absence or Permanent Resignation from the School ADM 3.10 Transfer Credit
- ACA 2.04 Re-admissions
- ADM 4.02 Federal Financial Aid Programs
- ADM 4.04 Student Accounts
- ADM 5.01 Financial Refunds

VIII. Disclaimers

Nothing in this policy creates a contractual relationship between Bon Secours St. Mary's 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	08/01/2023	New Template	Chief Financial Officer
3.0	08/01/2024	Updates to Veteran Affairs Financial Refunds	Chief Financial Officer