



Allen School of Health Sciences

Financial Aid

Policies & Procedures Manual

2018-2019



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A: GENERAL ADMINISTRATIVE REQUIREMENT

This financial aid policies and procedures manual is intended to reflect updated federal, state and institutional regulations and provide guidance to the administrators in administering and monitoring financial aid processes. This is also useful to other offices for appeal and academic review, financial and compliance auditors, state and federal program reviewers.

Introduction to the Financial Aid Office

The office of financial aid is central in the processing and monitoring of all financial aid including federal, state, outside agencies and institutional as applicable. This office works in close coordination with the admissions, accounts and registrar's office.

Purpose & Philosophy of the Financial Aid Office

Our mission is to fulfill the educational and professional career needs of growth oriented individuals who are prepared to change or upgrade their careers and lives for the better. Therefore we offer educational programs in the fields where potential job opportunities exist.

The Office of Financial Aid is dedicated to provide information, guidance and advice to students in securing funding to fulfill their financial obligations and educational needs and process all Title IV aid for which students are eligible. The director and the staff members in the office are available during the normal business hours.

Financial Aid Office Structure & Position Responsibilities

The Director of Financial Aid is responsible for administering all Title IV awards including awarding and the cancellation of loans. The Educational Compliance Management completes all regulatory reporting and Title IV refunds.

The staff members counsel, package, complete verification process and resolve 'C' code comments concerning FAFSA. They coordinate and consult with Education Compliance Management - the third party service provider for processing of all Title IV aid.

Financial Aid Office Administrations

The Office of Financial Aid is open for prospective and continuing students and parents all year round during the following hours and days except all national and institutional holidays and inclement weather related emergency closures.

Monday through Thursday from 9AM – 7:00PM EST, Friday from 9AM – 3PM EST. Closed for observed holidays.

The staff in the Office of Financial Aid at ALLEN SCHOOL OF HEALTH SCIENCES is dedicated to assisting students and their families and opening the doors for them to a quality private education



While the primary responsibility of meeting postsecondary education costs rests with the student and family, our financial aid professionals seek to maximize financial aid opportunities by providing guidance and information about Title IV grants, extended payment plans, student employment, and payment options.

More than 90 percent of ALLEN SCHOOL OF HEALTH SCIENCES students generally receive financial aid, take advantage of different payment options, or participate in the parent loan program.

Policies & Procedures Development Responsibilities

The Board of Trustees/Directors is ultimately responsible to develop policies and procedures and their periodic reviews and updates.

The President/CEO and the Director of the institution are responsible for ensuring others are aware of any changes to existing policies and procedures or the development of new ones. Generally, updates are made as the federal and state regulations changes, otherwise every year policies and procedures are reviewed and all concerned are notified via email or inter-office memorandum. This policies and procedures manual is available from the institution's financial aid office or online at http://online.allenschool.edu/online/utilities/annual_documents

The Office of Financial Aid frequently checks ED's Information for Financial Aid Professionals (IFAP) web site as it is a Title IV requirement for schools to have access to the IFAP website. Although it is not a requirement that school subscribe to IFAP's notification services, ALLEN SCHOOL OF HEALTH SCIENCES subscribes and the IFAP's subscription service notifies its financial aid professionals via e-mail of new and timely statutory and/or regulatory changes.

Administrative Organization & Office Management

Various offices such as the financial aid office, student accounts, registrar, admissions and academic affairs work together in a cohesive manner to ensure compliance with the Title IV programs and their regulations.

Separation of Duties

These various offices work independently as required by the regulatory agencies but in close coordination and report to CEO/President of the school. The admissions office is responsible for recruitment, admissions, registration and orientation of new students. The office of financial aid is responsible for processing FAFSA applications, needs analysis, awarding and processing of all Title IV aid, institutional and outside grants and scholarships. The student accounts office maintains all student records related to all payments including Title IV awards. They are responsible for maintaining individual student accounts and continuous update of the student ledger cards. The attendance coordinator is responsible for recording grades, monitoring and implementing attendance, leave of absence and satisfactory academic progress policies and procedures.

Joe Mure, Director of Admission – All Campuses
Telephone for online admissions office is 1-718-243-1700 Fax number is 718-935-1180
Email: Joe.mure@allenschool.edu

For all Campus related matters contact:

Jill Luke, Director of School Main Campus in Jamaica, NY
Telephone for Main Campus is 718-291-2200 Fax number is 718-523-3661
Email: jill.luke@allenschool.edu

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Joe Mure, Director of Branch Campus in Brooklyn, NY
Telephone for Branch Campus is 718-243-1700 Fax number is 718-875-2855
Email: joe.mure@allenschool.edu

Libby Hunt, Director of School Branch Campus in Phoenix, AZ
Telephone for Phoenix Campus & Online Division is 623-385-8150 Fax number is 1-800-592-3012
Email: libby.hunt@allenschool.edu

For all Financial Aid matters, contact:

Ruth Martinez Vice President, Student Financial Affairs, Telephone number 718-243-1700 x 333 Fax number is 718-422-2965
Email: ruth.martinez@allenschool.edu

Nandranie Dioquino, Director of Financial Aid, Main Campus in Jamaica, NY,
Telephone for Main Campus is 718-291-2200 Fax number is 718-523-3661
Email: nandranie.dioquino@allenschool.edu

Crystal Manuel, Manager of Financial Aid Branch Campus in Brooklyn, NY
Telephone for Branch Campus is 718-243-1700 Ext.127 Fax number is 718-732-2515
Email: crystal.manuel@allenschool.edu

Gayle Naftzger, National Director of Financial Aid, Phoenix Online and Phoenix campus, Phoenix, AZ
Telephone for online admissions office is 623-385-8150 Fax number is 1-800-592-3012
Email: gayle.naftzger@allenschool.edu

For all Student Accounts matters, contact:

Ruth Martinez VP, Student Financial Affairs, Telephone number 718-243-1700 x 333 Fax number is 718-422-2965
Email: ruth.martinez@allenschool.edu

For all Academic Affairs matters, contact:

Tim Cheslik, Director of Academic Affairs NY Campuses Email: timothy.cheslik@allenschool.edu

Libby Hunt, VP of Academic Affairs Phoenix Campus Email: libby.hunt@allenschool.edu

For Registrar and Career Services, contact:

Stephanie Roland, Director of Student Affairs Allen School Campuses Email: Stephanie.roland@allenschool.edu

Accommodations for Disabilities

ALLEN SCHOOL OF HEALTH SCIENCES fully complies with the provisions and requirements of the Americans with Disabilities Act (ADA) 1984.



Appointments with Staff

Students and parents may come and speak to our financial aid staff members as walk-ins during the regular office hours. They may also call ahead of time and make appointment to meet the Financial Aid Director if necessary. Online applicants or students may speak to the Financial Aid Office by phone or make an appointment. The office can also be reached via phone, email, or fax. The student and/or the parent are notified and confirmed by email, return phone call or fax of such appointments.

Treatment of Correspondence/Forms

All forms such as Free Application for Federal Student Aid (FAFSA), verification worksheet, FERPA release form, Entrance & Exit Interview forms, dependency override form, professional judgment request form etc. are available in the Office of Financial Aid. These forms may be mailed to student upon request. A copy of Financial Aid estimate and award notification may be obtained upon request.

To obtain maximum consideration for financial aid, the student and family must learn:

- About eligibility for various funding programs that are available.
- To follow instructions provided on various application forms and other materials.
- To pay careful attention to deadline dates.

Timely submission of application forms and other required documentation will enable our staff to process your requests accurately and in a timely fashion for the start of classes each time.

Telephone

The person assigned to answer telephones will route all calls concerning financial aid to the appropriate Office of Financial Aid. You can always contact us directly with any questions or concerns.

Confidentiality of Student Records

ALLEN SCHOOL OF HEALTH SCIENCES maintains complete confidentiality of student's records as per FERPA (Family Education Rights and Privacy Act) of 1974.

Records Management & Retention

The school maintains hardcopy individual student files (paper folders) and computerized student ledger cards, grade sheet, attendance records if applicable, academic records, admission records etc. and retains them for 5 (five) years.



Files older than two years if required by auditors, reviewers must be pulled out of archives and requests for such files must be made in advance in writing.

Information Sharing & The Family Education Rights and Privacy Act of 1974 (FERPA)

What is FERPA?

The Family Rights and Privacy Act of 1974, as amended, (commonly known as the Buckley Amendment) is a federal law which provides that schools will maintain the confidentiality of student education records. The law basically says that no one outside the institution shall have access to students' education records nor will the institution disclose any information from those records without the written consent of students. There are exceptions, of course, so that certain personnel within the institution may see the records, including persons in an emergency to protect the health or safety of students or other persons.

What is considered Directory Information?

In compliance with **FERPA**, the following statement reflects the school's policy:

The following directory information may be released by telephone: a) student's dates of attendance; b) date of graduation and degree or certificate earned. Other kinds of directory information, such as a student's address, telephone listing, program of study, awards received, and the most recent previous education agency or previous institution attended, will be released only in response to a written request. The school reserves the right to refuse the above information if the reason for the request is not considered to be a sufficient need to know. Information regarding the student's record: grades, courses, GPA, social security number and other personal information will not be released without the student's written consent.

However, the Act states that each student has the right to inform the School that any or all of the information is not to be released. No information will be released without the written consent of the student. This status is binding until such time that ALLEN SCHOOL OF HEALTH SCIENCES is notified in writing by the student to permit release of "directory information".

What about . . . ?

Parental Access to Children's Education Records

At the postsecondary level, parents have no inherent rights to inspect a student's education record. The right to inspect is limited solely to the student. Records may be released to parents only under the following circumstances: (1) through the written consent of the student, (2) in compliance with a subpoena.

Posting of Grades by Faculty

The public posting of grades either by the student's name, institutional student identification number, or security number without the student's written permission is a violation of **FERPA**.

Staff Member Responsibilities

Employees of ALLEN SCHOOL OF HEALTH SCIENCES may have access to student education records. Their confidentiality, use, and release are governed by **FERPA**. Employee utilization of this information is governed by the regulations and the duties and responsibilities of your employment and position. Unless



your job involves release of information and you have been trained in that function, any requests for disclosure of information, especially from outside the school, should be referred to the Director of the Institution. Release of information contained on a student's record without the written consent of the person identified on the document is in violation of Sec. 438 Public Law 90-247. All employees have their own accounts and passwords on the administrative

computer system and on e-mail. Staff members are responsible for their personal account and will be held accountable for any improper use. Protection of sign-on password and procedure is critical for security. An employee password is the only protection an account has, and the only way the computer system can verify that the staff member is actually who they say they are.

Title IX Coordinator

Title IX coordinator plays an essential role in helping ensure every person affected by the operation of our institution-including employees, students, their parents or guardians, applicants for admission and employment-is aware of the legal rights Title IX and that our institution comply with the legal obligations under Title IX. The Title IX coordinator is Ruth Martinez-VP, Student Financial Affairs.

Procedure

The Title IX coordinator's primary responsibility is to coordinate the recipient's compliance with Title IX, including the recipient's grievance procedures for resolving Title IX complaints. The recipient must inform the Title IX Coordinator of all reports and complaints raising Title IX issues, even if the initial complaint was filed with another individual or office.

In Summary, Remember . . .

- Staff must check a person's picture identification when releasing education records. Staff must always check to see if the student permitted disclosure of information before you release any information on the student.
- Staff must not discuss a student's record with any person who does not have a legitimate educational interest as doing so is a violation of **FERPA**. This pertains to conversations on and off the job.
- Staff may not remove any document from the office for non-business purposes as doing so is a violation of **FERPA**.
- Staff may not release confidential student information (non-directory) to another student, College or University, organization, or to any person who does not have a legitimate educational interest, or to the parents of a dependent student without the student's written authorization as doing so is in violation of **FERPA**.
- Staff may not leave reports or computer screens containing confidential information in view of others who do not have a legitimate educational interest in the data or leave their computer unattended as doing so is in violation of **FERPA**.
- Staff may not make personal use of student information as doing so is in violation of **FERPA**.
- Staff may not allow another person to use their computer access code as doing so is in violation of **FERPA**.
- Staff may not put paperwork in the trash with a student's information (i.e., social security number or grades) as doing so is also in violation of **FERPA**.
- In addition to the possibility of personal litigation, proven **FERPA** violations may result in loss of federal funds to ALLEN SCHOOL OF HEALTH SCIENCES.
- Violation of confidentiality and security may lead to appropriate personnel action.



Authorization Consent Form

Student Information Release Form

FERPA Explanation

The purpose of the Federal Educational Rights and Privacy Act of 1974 is to protect the privacy of information concerning individual students by placing restrictions on the disclosure of information contained in the student’s school records. In order for the Office of the Registrar to honor a verbal or written request for information by anyone other than the individual student, assigned authorization must be on file.

I authorize the release of personal information to the following:

I, _____ Last four digits of SSN: _____ Date of Birth: _____

Do not authorize the release of any personal information to a third party, unless the disclosure is otherwise allowed under an express FERPA exception to disclosure or required by law.

Do authorize the Registrar’s Office at Allen School of Health Sciences to release personal information per the information below:

Print Name *Relationship to Student*

I understand that this pertains to information regarding ALL of the following: ACADEMIC PERFORMANCE (including final grades). ATTENDANCE, HOUSING, STUDENT ACCOUNTS, FINANCIAL AID, and REGISTRATION.

The above information will be released with my FULL CONSENT. I understand that this authorization remains in effect from today through _____ (month/year). It will be necessary to send a written letter to revoke this authorization prior to the expiration date I have indicated.

Student’s Printed Name: _____

Student’s Signature: _____



This authorization form is not required when school transmits information to state and federal agencies concerning processing of Title IV aid. This authorization is not also required if student files are subject to institutional, state and federal program review and audit.

Information Release via Telephone

No information concerning any student is released to any individual, group or organization via telephone, cellular phone or other similar devices unless that individual, group or organization is involved in the awarding and processing of student's Title IV aid or the student has provided written permission to discuss such information with an individual.

Compliance Audits- Andrew Pieri CPA

ALLEN SCHOOL OF HEALTH SCIENCES participates in Title IV programs. As such, to meet the statutory requirements of the Department of Education it undergoes an annual compliance audit conducted by a CPA firm (currently Andrew's Pieri Accounting Firm, CPA), who is sufficiently independent of the school. The independent auditor must be a certified public accountant or a government auditor. All audits are submitted along with an audited financial statement to the Department of Education (ED) as required. In addition ECM, the third-party service provider who performs certain student financial assistance functions for ALLEN SCHOOL OF HEALTH SCIENCES does also conduct an annual compliance audit.

The financial statements to be submitted must cover ALLEN SCHOOL OF HEALTH SCIENCES last complete fiscal year. ED defines the scope of the financial statements needed, as well as any documentation deemed necessary to determine the school's financial responsibility. All required audits are submitted on-line via ED's eZAudit Web site at www.ezaudit.ed.gov.

Type of Audit

The type of audit a school undergoes depends on its method of control: public, for profit, or nonprofit. The audit requirements for public colleges, state and local universities, and nonprofit institutions are satisfied by the Single Audit Act, in accordance with Office of Management and Budget's (OMB) Circular A-133. Since ALLEN SCHOOL OF HEALTH SCIENCES is a for-profit institution, it is required to have conducted the Single Audit as detailed above. Although the financial aid office may not be directly involved in every phase of an audit, the staff is knowledgeable about the process.

As per section 668.23(g)(4) of HEA 1965, ALLEN SCHOOL OF HEALTH SCIENCES is solely responsible for any liability owed by the institution's third-party servicer ECM for a violation incurred in servicing any aspect of that institution's participation in the Title IV programs.

The Offices of Financial Aid, Academic Affairs, Registration and Student Accounts are involved in the audit process and must cooperate fully with any audit or the ED, accrediting agency, state licensing agencies or ECM program review. The President/CEO of the School is responsible for coordinating the overall audit process. The School President maintains contact with the auditor. A complete student file containing enrollment, academic, financial aid, and accounting records must be provided to the auditor upon request for any student under review or audit. The School President and SMEs are responsible for addressing, correcting and reconciling any findings within one month from the date of receipt of the audit report or the federal deadlines whichever is earlier. Both the Office of Financial Aid and Student Accounts are responsible for ensuring any repayments (as a result of any liabilities) are made in the timeframe as specified by the ED explained in the overpayment section in this manual.

The financial aid office participates in the audit process in the following manner:



The financial aid office receives notices of requested sample records from the Director of the School, the Subject Matter Expert of Student Services and Finance, and the Director of Financial Aid coordinates with the auditor as permitted by the Director of the School and provides those records. Individual student files, computer printouts of the latest student ledger card, attendance records etc. are provided to the auditor in alphabetical order. The Director of Financial Aid receives a copy of any audit findings. The Senior Director, Student Financial Affairs along with the Director of the School coordinates information that is provided to an auditor, as well as communicates with the auditor during his or her time on the ALLEN SCHOOL OF HEALTH SCIENCES campus.

Audit Submission Schedule

All audits must be prepared on a fiscal-year basis i.e. Jan 1 through Dec 31st for ALLEN SCHOOL OF HEALTH SCIENCES and must cover all Title IV transactions that have occurred since the previous audit. ALLEN SCHOOL OF HEALTH SCIENCES annual compliance and financial statements audit performed under ED's Audit Guide must be submitted within six months of the end of the school's fiscal year. Refer to 2018 -2019 FSA Handbook for more details.

The OIG provides additional information about audits on the following Web site:
www.ed.gov

Federal Student Consumer Information Requirements

ALLEN SCHOOL OF HEALTH SCIENCES provides financial aid in the form of grants and educational loans to approximately 90 percent of its student body annually. The application process begins when students complete and submit the Free Application for Federal Student Aid (FAFSA). The FAFSAs are inputted to CPS electronically. When the school receives the ISIR, then it determines eligibility for students using a combination of programs in an attempt to both reward academic achievement and meet their demonstrated financial needs based on a federally mandated formula of:

COST OF EDUCATION minus EXPECTED FAMILY CONTRIBUTION = UNMET NEED

Financial Aid Information and Institutional Information

GRANTS

FEDERAL PELL GRANTS: Amounts can change yearly. For the 2018–19 award year (July 1, 2018, to June 30, 2019), the maximum award is \$6095. Pell grants may be prorated based on clock, semester credit or quarter credit hours, weeks in the program and the full schedules award amounts as required by the ED.

LOANS

Federal Subsidized Direct Loans:

Direct Subsidized Loans are available to undergraduate students with financial need.

The financial Aid office determines the amount you can borrow, and the amount may not exceed your financial need.

The U.S. Department of Education pays the interest on a Direct Subsidized Loan while you're in school at least half-time, for the first six months after you leave school (referred to as a grace period*), and during a period of deferment (a postponement of loan payments).



*Note: If you received a Direct Subsidized Loan that was first disbursed between July 1, 2012, and July 1, 2014, you will be responsible for paying any interest that accrues during your grace period. If you choose not to pay the interest that accrues during your grace period, the interest will be added to your principal balance.

Federal Unsubsidized Direct Loans:

Direct Unsubsidized Loans

Direct Unsubsidized Loans are available to undergraduate and graduate students; there is no requirement to demonstrate financial need. The financial aid office determines the amount you can borrow based on your cost of attendance and other financial aid you receive.

You are responsible for paying the interest on a Direct Unsubsidized Loan during all periods.

If you choose not to pay the interest while you are in school and during grace periods and deferment or forbearance periods, your interest will accrue (accumulate) and be capitalized (that is, your interest will be added to the principal amount of your loan).

150% Loan time-limitation

If you are a first-time borrower on or after July 1, 2013, there is a limit on the maximum period of time (measured in academic years) that you can receive Direct Subsidized Loans. This time limit does not apply to Direct Unsubsidized Loans or Direct PLUS Loans. If this limit applies to you, you may not receive Direct Subsidized Loans for more than 150 percent of the published length of your program. This is called your "maximum eligibility period." Your maximum eligibility period is generally based on the published length of your current program. You can usually find the published length of any program of study in your school's catalog.

For example, if you are enrolled in a four-year bachelor's degree program, the maximum period for which you can receive Direct Subsidized Loans is six years (150 percent of 4 years = 6 years). If you are enrolled in a two-year associate degree program, the maximum period for which you can receive Direct Subsidized Loans is three years (150 percent of 2 years = 3 years).

Because your maximum eligibility period is based on the length of your current program of study, your maximum eligibility period can change if you change to a program that has a different length. Also, if you receive Direct Subsidized Loans for one program and then change to another program, the Direct Subsidized Loans you received for the earlier program will generally count toward your new maximum eligibility period.

Federal Parent Loans for Undergraduate Students (PLUS):

If a Parent is eligible for a Direct PLUS Loan, the parent will be required to sign a Direct PLUS Loan Master Promissory Note (MPN), agreeing to the terms of the loan. The maximum PLUS loan amount you can borrow is the cost of attendance (determined by the financial aid office) minus any other financial assistance received

Interest Rate

The current undergraduate interest rates for Direct loans for the year July 1, 2018 - June 30, 2019 are: 5.05%. Undergraduate Parent Plus Loan: 7.6%.

Verification

Students applying for federal financial aid may be selected for a process called verification. If selected, students are required to provide additional documentation in support of their applications for federal student aid. The documentation can include, but is not necessarily limited to, copies of parent and student federal income tax returns. Your financial aid award is considered an estimate and may be subject to change until the verification process is complete.

Satisfactory Academic Progress



Renewal of federal, state and school financial assistance is contingent upon students making academic progress, as defined by the ED, State agencies and school. In addition, federal regulations require continuing students to have met minimum standards of progress, even if applying for the first time. Please contact the Financial Aid Office for details regarding satisfactory progress. For details refer to the Satisfactory Academic Progress section of the manual.

Changes in Enrollment

Eligibility for financial aid may be tied to the number of clock hours or credits hours enrolled. **Please remember that dropping a class or classes, or not fulfilling required clock hours of attendance in a clock hour program may affect a student's financial aid eligibility within a term, and may also affect his/her eligibility to continue to receive assistance. For additional information, please contact the Financial Aid Office.**

Withdrawals

If it becomes necessary to withdraw from all classes during an enrollment period, federal regulations require that federal student aid be adjusted based on the number of days a student completes prior to withdrawal. Students should contact the Financial Aid Office and ask to speak with a financial aid counselor regarding the effects of withdrawal.

**Students must officially withdraw from the school through the Director of Registrar in each institution.*

BILL PAYMENT

Payments and Anticipated Aid

All students are handed statements with instructions for making payments upon completion of their financial Aid appointment. All statements list school-assessed charges less any anticipated aid. All students must complete the FAFSA and have a valid ISIR to be considered for federal aid. Failure to apply for financial aid in a timely manner does not relieve the student from meeting all school payment deadlines.

Please note: All current school charges for tuition, fees, books & supplies must be paid in full BEFORE students are allowed to attend the graduation ceremony, receive their official transcripts, and certificate.

All School charges are listed in the School Catalog.

If personal payments and/or financial aid posted to a student's account create a credit balance, a refund is issued to any Title IV loans first in the following order (Plus, Unsubsidized loan, Subsidized loan). If there are no Title IV loans posted to the ledger card a refund will be issued to the student. Generally, refunds are issued within 45 (30 for Arizona) days of the student's last day of attendance or within 14 days a credit balance was created. Please contact ALLEN SCHOOL OF HEALTH SCIENCES Student Accounts Office at (718) 291-2200 (main campus) or 718-243-1700 (branch campus in Brooklyn).

Completion or Graduation Rates

ALLEN SCHOOL OF HEALTH SCIENCES annually prepares its completion or graduation rate, and, if applicable, its transfer-out rate, and make these rates available to any enrolled or prospective student, on request. The School Director prepares this report with all applicable rates and disseminates them through annual publication. These rates are submitted to the state education department on an annual basis and the reports generated as a result are public information.



Annual Security Report

Campus security and safety is an important feature of postsecondary education. The Department of Education is committed to assisting schools in providing students nationwide a safe environment in which to learn and to keep student, parents and employees well informed about campus security. These goals were advanced by the Crime Awareness and Campus Security Act of 1990. The Department is committed to ensuring that postsecondary institutions are in full compliance with that Act, and enforcement of the Act is a priority of the Department.

ALLEN SCHOOL OF HEALTH SCIENCES distributes an annual security report—including crime statistics and campus policies and procedures regarding security matters—to enrolled students and current employees. The institution ensures that prospective students and prospective employees are informed of the availability of the report and given an opportunity to obtain it from the main administrative office or view it online. The statistics portion of the report is also submitted to ED, as required.

- ◆ The Director of Campus Safety compiles, maintains, distributes, and the CEO /President submits the crime statistics to ED
- ◆ The Board of Directors constructs and reports the institution's policies regarding campus security
- ◆ The annual security report is disseminated to faculty, staff, students, and the regulatory agencies via the web and e-mail OR
- ◆ One must request in writing to obtain a free copy of the full published report.

Data on Campus Crime

- ◆ Parents and students can now use the Internet to review campus crime statistics for ALLEN SCHOOL campus online. through the following website:
<http://ope.ed.gov/security/search.asp>

The data are presented in three parts:

- Arrests
- Criminal Offenses
- Hate Crimes

State-Required Consumer Information

The office of financial aid is responsible to make all state required information available to all prospective and current students. Yearly review is done to update and include all current regulation and fulfill state requirements in disseminating information.

Accrediting Agency Consumer Information



The office of financial aid is responsible to make all accrediting agency required information available to all prospective and current students. Yearly review is done to update and include all current regulation and fulfill the agency requirements in disseminating information.

B: GENERAL FINANCIAL AID PROGRAM INFORMATION

Institutional Eligibility Requirements

ALLEN SCHOOL OF HEALTH SCIENCES is a for-profit institution of higher education eligible to participate in the Title IV programs. A copy of the Program Participation Agreement, Eligibility and Certification Approval Report, accrediting agency letters, state authorization and licensure documents are displayed and available for inspection in the Office of the School Director for all enrolled and prospective students and families.

The Director of Financial Aid and the CEO/President track the expiration of the PPA and coordinate the recertification process with ECM our third party service provider. ALLEN SCHOOL communicates and coordinates with ECM which is responsible to update the ECAR by submitting the Electronic Application to the ED for any changes in the institution that requires a notification to accrediting agencies, state and federal department of education. Internal programs reviews, compliance audits by the independent financial auditors, third party service provider's program review and audits are routinely conducted to insure Title IV compliance and institutional eligibility is in good standing at all times.

Program Eligibility

ALLEN SCHOOL offers the Medical Assistant campus-based program, a fully online Medical Insurance Billing and Coding program, and a Medical Insurance Billing and Coding Associates Degree Program which are eligible for Title IV aid. The Medical Assistant program for the campuses meets both days and evenings. The Medical Insurance Billing and Coding Program and Medical Insurance Billing and Coding Associates Degree Program are offered online. All staff members are fully aware that these programs are eligible for Title IV aid and the applicant is made aware of Title IV eligibility. The Office of Financial Aid is responsible for this determination.

Ineligible Programs

The institution offers a Nursing Assistant program and a Patient Care Technician Program which is ineligible for Title IV aid. *All staff members are fully aware that this program is ineligible for Title IV aid and the applicant is made aware of that.*

Evaluation of New Programs

All new programs are evaluated and must meet the following criteria in order to be considered as Title IV aid eligible programs.

- Meet minimum clock hours and/or Credit Hours and time requirement
- Approved by a Department of Education-recognized accrediting agency
- Approved by the state agency



Only then the new programs upon meeting ED's requirements and obtaining ED's approval are included in the PPA and ECAR.

Administrative Capability

ALLEN SCHOOL OF HEALTH SCIENCE's administration is a group of experienced and competent individuals who are knowledgeable in Title IV aid administration. The school administration is supported by ECM, the third party service provider for all Title IV aid administration and financial aid training. ECM is actively involved in the education industry as an external consultant and service provider for more than 25 years.

Responsibilities of Institutional Offices and Separation of Duties

These various offices work independently and report to CEO/President of the school. The admission office is responsible for recruitment, admissions and orientation of new students. The office of financial aid is responsible for needs analysis, awarding and processing of all Title IV aids, institutional and outside scholarships. The bursar/accounting office maintains all student records related to payments of Title IV awards. The Registrar coordinator is responsible for recording grades, attendance and satisfactory academic progress.

Records

The school maintains individual student files (paper folders) and computerized student ledger cards, grade sheets, academic records, admission records and retains them for 5 (five) years. Some documents such as loan promissory notes, exit & entrance interview forms are retained for an indefinite period. Files older than two years if required by auditors/reviewers must be pulled out of archives and requests for such files must be made in advance in writing. The ledger cards and transcripts are kept for an indefinite period.

Information Discrepancies

A school must verify any application information that it has reason to believe is incorrect or discrepant. The Office of Financial Aid may also select files for verification if there appears to be a conflict of information. ALLEN SCHOOL OF HEALTH SCIENCES must resolve all such conflicting information, except if the student dies during the award year. If the school has conflicting information concerning a student's eligibility or has any reason to believe a student's application information is incorrect, it **must** resolve the discrepancies before disbursing any FSA funds. If it discovers discrepancies *after* disbursing FSA funds, the school must still reconcile the conflicting information and take appropriate action under the specific program requirements.

Reviews & Proceedings

ALLEN SCHOOL OF HEALTH SCIENCES has been found to be in full compliance in recent reviews conducted by the independent CPA, the school accrediting agency and/or state agency and the Internal Audit department of the school. The copies of the latest program reviews are available to all prospective and enrolled students upon request. The request must be made in writing in the Office of Financial Aid.

Cohort Default Rates



The Cohort Default rate for ALLEN SCHOOL OF HEALTH SCIENCES is the percentage of the federal student loan borrowers who enter repayment within the cohort fiscal year divided by those who default within the cohort default period. The Federal Government will provide yearly the cohort default rates for the school.

The school will make every effort to keep the default rate under 20%. If the default rate should be greater than 25% for three consecutive years, the school will lose Federal Stafford Loans and Federal Pell Grant eligibility. The school may appeal the decision of the Department of Education. The default rate for Allen School in 2016 was **18.4%**.

Schools participating in the Federal Stafford Loan Program for the first time, or schools that have had a change of ownership that resulted in a change in control are required to use a default prevention and management plan to participate in the Title IV programs.

ALLEN SCHOOL OF HEALTH SCIENCES utilizes the following nine Default Prevention and Management Activities:

Allen School has partnered with ECMC Solutions to reduce overall default rate. Allen School will use Loan Tracker to review student's loan repayment status. Loan Tracker has "real-time" reports which will enable faster communication results with the student.

1. Entrance Counseling: Requires first time borrowers to have explanations of how the master promissory note works, that the loan must be repaid, the consequences of default and be shown sample monthly repayment amounts. The school will collect as much contact information as possible to facilitate future contact if needed.
2. Financial Literacy for Borrowers: The school will offer the student written information on their loans, how to manage debt, etc. The following will be provided at entrance and exit interviews:
 - a. estimate of required monthly payments on loan balance
 - b. calculations to help estimate and manage debt
 - c. Loan servicer contact information
 - d. Contact information for delinquency and default prevention assistance on campus
 - e. Introduction to NSLDS for students
 - f. "Repaying Your Student Loans" publication
3. Communication throughout the Campus: The school will review its communication among departments to determine a student's academic progress, attendance, enrollment status, etc. The Financial Aid Director will try to ensure all departments are involved.
4. Exit Counseling: The school will comply with Federal Regulations and hold exit interviews. Explanation of payment plans and choices that fit the borrowers' needs is essential. The exit interview will attempt to clear up any misconceptions that the student may have regarding the loan. Students, who withdraw, rather than graduate, must also complete exit interviews. These students have the highest risk of default and every effort must be made to reach these students.
5. Timely and Accurate Enrollment Reporting: Completing the Student Status Confirmation Report (SSCR) accurately and completely on current students and returning the SSCR error report to ECM within the time allotted is most important. This will ensure the student data is accurate, and that end dates are correct for exit interviews.
6. NSLDS Date Entered Repayment Report: The SSCR also contains students who have left school. This assures that student status is correct and that students enter the correct cohort year and that schools receive accurate cohort default rates.
7. Late Stage Delinquency Assistance: When notified that students are more than 240 but less than 361 days delinquent the school will make every effort to contact these students and inform them of their delinquency.
8. Loan Record Detail Report (LRDR) Data Review: ALLEN SCHOOL OF HEALTH SCIENCES reviews its LRDR and challenges any incorrect data on this report if found.



9. Analyze Defaulted Loan Data to Identify Defaulter Characteristics: ALLEN SCHOOL OF HEALTH SCIENCES gathers information to discern who is defaulting and why. ALLEN SCHOOL of HEALTH SCIENCES uses this information to improve its default prevention.

Default Prevention Plan

The purpose of this plan is to reduce student loan defaults in the Federal Direct Loan Programs and to inform students of the importance of repayment.

Communication with student loan borrowers before their repayment is key in helping them successfully manage their loan repayment.

Financial Aid will begin working with the student population while they are in school to help them understand their student loan obligations. As they graduate or withdraw from school, we will provide them with contact information for ECMC (Education Credit Management Corporation) and equip them with necessary resources and a clear understanding of their repayment options, and how to find help when they need it.

Procedures

Following are the procedures to be taken by Financial Aid during the students' in-school life cycle.

- For the Arizona campus and distance education programs: After enrollment and prior to the financial aid appointment the student is given "Loan Entrance Counseling" and "Funding Your Education" documents. This will allow time for the student to review. An explanation is provided about the master promissory note. Emphasis is made about the importance of repaying the loan and the consequences of default. An entrance interview guide published by the U.S. Department of Education is included with the student's documents.
- For the Arizona campus and distance education programs: During the financial aid appointment to complete the FAFSA, Financial Aid will discuss eligibility, including types of loans (subsidized/unsubsidized), repayment obligations, interest and process for repayment. Students are encouraged to complete an in-school deferment if they have prior federal loans. During this appointment, the entrance interview will be reviewed/signed by the student.
- For the New York programs: During the financial aid appointment to complete the FAFSA, Financial Aid will discuss eligibility, including types of loans (subsidized/unsubsidized), repayment obligations, interest and process for repayment. Students are encouraged to complete an in-school deferment if they have prior federal loans. The student is given "Loan Entrance Counseling" and "Funding Your Education" documents. An explanation is provided about the master promissory note. Emphasis is made about the importance of repaying the loan and the consequences of default. An entrance interview guide published by the U.S. Department of Education is included with the student's documents. During this appointment, the entrance interview will be reviewed/signed by the student.
- Module 1: During the last week of classes, a presentation/overview will be provided to students by the Director of Financial Aid to ensure they understand the importance of repaying students loans and the consequences/dangers if they do not. Information is provided about the Direct Loan Website (studentloans.gov) and all students are encouraged to create an account to monitor their student loans. This website provides all activity and information about the student's loan and serves as an education tool during the life of their loan.

- o Defaulted loans are reported to Credit Bureaus causing borrowers to sustain



- o long-term damage to their credit rating.
 - o Defaulters may also face difficulty in securing mortgages or car loans, may have their wages garnished and have their federal income tax refunds and other federal payments seized.
 - o Until the default is resolved, collection efforts continue and the
 - o defaulter will be ineligible for additional federal student aid.

- Module 5: During the last week of classes, a presentation/overview will be provided to students by the Director of Financial Aid to ensure they understand the importance of repaying students loans and the consequences/dangers if they do not. Information is provided about the Direct Loan Website (studentloans.gov) and all students are encouraged to create an account to monitor their student loans. This website provides all activity and information about the student's loan and serves as an education tool during the life of their loan.

- - o Defaulted loans are reported to Credit Bureaus causing borrowers to sustain long-term damage to their credit rating.
 - o Defaulters may also face difficulty in securing mortgages or car loans, may have their wages garnished and have their federal income tax refunds and other federal payments seized.
 - o Until the default is resolved, collection efforts continue and the defaulter will be ineligible for additional federal student aid.

- Each time a disbursement occurs, Loan Disbursement letters are distributed to the student with details on the disbursement (i.e. type and amount).

- Upon completion and graduation, students are provided with “exit interview counseling” per the Department of Education regulations. Students are also reminded about their federal student loans, when the loan servicer will be contacting them, who to contact should they have difficulty making their loan payments and what options they may have to avoid defaulting (i.e. deferment, forbearance or switching to a payment plan that will be more affordable).

- Students who fall into delinquent status on their federal student loans are notified of their delinquency through email, letters and phone calls. Students are encouraged to contact the Director of Financial Aid/Default Prevention to discuss and to review options if they are not able to make the current payments. The Director of Financial Aid/Default Prevention will work in conjunction with the student, ECMC and Servicer to find the best option available for the student to prevent them from falling into Default.

**Exit Counseling Letter
Provided to all students**

Allen School Exit Interview Guide

Average Indebtedness for Students at Allen School-Brooklyn Campus

The following are the average student loan debts and estimated monthly payment amounts for students graduation from the Allen School based on the loan type:

Program	Average Debt	Average monthly payment
Medical Assistant	\$ 9,500.00	\$ 112.00
Medical Assistant (Dependent)	\$5,500.00	\$ 65.00



Example: The following are the monthly and total payment amounts for a \$10,000 loan under a 10 year standard repayment plan.

Loan	Monthly payment	Total Payment
Stafford (6.8%)	\$115.08	\$13,809.64
Plus Parent Loan (8.5%)	\$123.99	\$14,878.28

Use the Student loan Repayment Calculator:

www.finaid.org/calculators/loanpayments.phtml. The Repayment Calculator will assist you on your estimated payment plan for the amount you borrowed.

- 1.) Note the following information about your loan(s):
 - The maximum interest rate for a Stafford Loan is 6.8%
 - Stafford loans and PLUS loans accrues interest from the date of disbursement; you are responsible for the payment of this interest.
 - Stafford loans enter repayment the day after the six-month grace period ends.
 - PLUS loans enter repayment immediately with the first payment due within 60 days of the last disbursement.

Income Base Repayment Plan (IBR)

The Income Based Repayment Plan (IBR) became available to students on July 1, 2009. Under IBR your required monthly payment is capped at an amount that is intended to be affordable based on your income and family size.

To determine if you are eligible for IBR you can use the Department of Education's calculator to determine if you would benefit. This calculator can be found at the following link:

<http://www.finaid.org/calculators/ibr.phtml>

National Student Loan Database

If you do not know who your lender is, you can check with your Financial Aid Department or search the National Student Loan Database at www.nsls.ed.gov. In order to search the database you will need your Federal PIN.

Important Information About Your Student Loans!

Exit Counseling

Prior to graduating or leaving school, borrowers are required to complete an exit counseling session. This exit counseling handbook has been provided to you to make sure you understand your rights and responsibilities as a Direct Loan Borrower.

After you graduate, leave school, or drop below half-time enrollment, you have a period of time before you have to begin repayment. This grace period will be six months for a Direct Stafford loan.

A parent who borrowed a Federal Plus loan generally begin repayment within 60 days after the loan is fully disburse. Parent borrowers may qualify for forbearance and will need to contact the lender to begin this process.

Master Promissory Note (MPN)

Your Master Promissory Note (MPN) also contains your Rights and Responsibilities. Your MPN is a binding legal contract that you signed to receive your student loans. By signing the MPN you indicated your commitment to repay your loans.

Tax Benefits

You may be eligible for a tax deduction up to \$2,500 of the student loan interest you paid! Contact the IRS or your tax advisor for more information or review IRS publication 970.

Extended Repayment Schedule:

Available to new borrowers on or after October 7, 1998 who have balances of more than \$30,000 in student loans.

Repayment Difficulty

If you do not repay your student loans on time or according to the terms of your promissory note, you might go into default, which will affect your credit rating. There is assistance for borrowers having difficulty repaying their educational loan, including deferment and forbearance.

Deferment: a deferment allows you to postpone your student loans temporarily. You must contact your lender to determine eligibility and to complete necessary documentation.

Forbearance: Forbearance allows you postpone or reduce your student loans temporarily. You must contact your lender to determine eligibility and to complete necessary documentation.



Loan Consolidation: Students can choose to consolidate their loans if they prefer to combine all federal loans into one monthly payment.

Debt Management

Manage your money through financial budgeting to help you account for money you earn and how you spend it. The budget worksheet below will help you prepare your future budget needs to meet your priorities.

Budget Worksheet

Expected Salary \$ _____

Monthly Income \$ _____

BUDGET ITEMS:

Housing Cost \$ _____

Food/Utilities \$ _____

Auto Loan/Transportation \$ _____

Miscellaneous \$ _____

Discretionary Income (Net monthly Income Less Total Expenses

Credit Cards \$ _____

Clothing \$ _____

Entertainment \$ _____

Personal \$ _____

Total Expenses \$ _____

Default

If you default, it means you failed to make payments on your student loan according to the terms of the promissory note. The guarantor, the financial institution that owns your loan and the federal government can take action to cover their money; such as damaging your credit, garnishing your wages, withholding your income tax refunds, social security benefits, file a civil lawsuit, suspension of professional licensing, and the loss of financial aid eligibility.

Have a dispute

The Federal Student Aid (FSA) Ombudsman work with student loan borrowers informally to resolve loan disputes.

You can reach the FSA Ombudsman at:

<http://ombudsman.ed.gov>

Need to speak with someone in the Financial Aid office?

Contact the school's financial aid office at : (718)243-1700

Exit Counseling Attestation

I have read exit counseling materials for my Stafford Loans. I have read and I understand my rights and responsibilities as a borrower. I understand that I have a loan from the federal government that must be repaid.

Student Name (Print)

Student Social Security Number

Student Signature Date



Letter to Introduce ECMC

ECMC

Solutions

Default Prevention Intro Email

Dear ..

We've enjoyed having you as a student and wish you the very best as you move on to a successful future.

To help ensure your success, we've teamed up with **Solutions at ECMC** to provide you with a single resource for all your student loan-related questions. **Solutions** is a non-profit organization dedicated to helping students manage educational loans and their resources are available to you **free of charge**.

Contact them for any of your student loan questions:

- One-on-one federal student loan repayment advice
- How to make payments
- Know what you owe
- Forbearances and deferments - what they are and why do you need them?
- Student loan forgiveness

Use the resources at **Solutions** as often as you need them - they are **free**.

Contact **Solutions at ECMC** by phone at 1-877-331-3262 or visit their website at www.ecmcsolutions.org to connect through email or web chat with one of their counselors.

We wish you the best for a successful future.

Sincerely,
The Allen School of Health Sciences

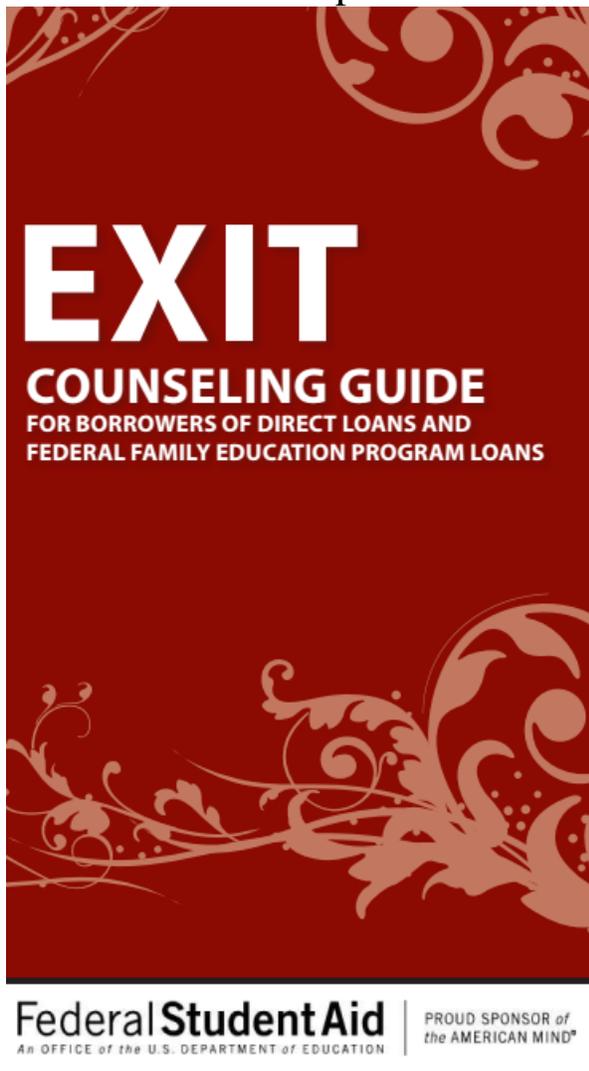
Financial Responsibility

ECM reviews Financial Aid Files, Student Accounts, and Academic Records yearly. The school is also audited annually by an independent outside auditor to review files and assure compliance with all Federal regulations.

Reporting & Reconciliation

ALLEN SCHOOL OF HEALTH SCIENCES must reconcile the students' accounts with the money drawn down from the Federal Government for Pell, Federal Stafford Subsidized and Unsubsidized loans. ECM provides Pell and Loan Disbursement reports and individual student awards notifications which will help in the reporting and reconciliation aspects of ALLEN SCHOOL statutory obligations.

Exit Interview Pamphlet from DL:



Fiscal Operation & Application to Participate

ALLEN SCHOOL OF HEALTH SCIENCES does not have to complete the Fiscal Operations Report and Application at this time.



National Student Loan Data System

ALLEN SCHOOL uses this information to obtain information on defaulted status before the student enrolls, enter Pell overpayments and FSEOG overpayments.

General Title IV Student Eligibility Requirements

The student must:

- ◆ Be enrolled as a regular student in an eligible program
- ◆ Not be enrolled simultaneously in two postsecondary schools without a consortium or contractual agreement.
- ◆ Meet one of the following academic criteria:
 - Have a high school diploma or its recognized equivalent (e.g., a GED);
 - Be enrolled in an eligible institution and sign an enrollment agreement.
- ◆ Have a valid Social Security Number with the Social Security Administration
- ◆ Be a U.S. citizen or eligible non-citizen
- ◆ Be registered with Selective Service, if required by law, with the Selective Service Administration for all male students who were born after December 31, 1959.
- ◆ Sign a Statement of Educational Purpose, which certifies that he or she will use federal student financial aid only to pay educational costs
- ◆ Not be in default on a Title IV loan or, if in default, have made satisfactory repayment arrangements
- ◆ Not owe a refund (overpayment) on any Title IV grants, or state grant previously received from any postsecondary institution.
- ◆ Sign an Anti-Drug Abuse Act certification statement
- ◆ Make satisfactory academic progress toward the completion of the degree or certificate as required by the institution, state agencies and the Department of Education.
- ◆ Complete a FAFSA (Free Application for Federal Student Aid) and have a valid ISIR (Institutional Student Information Record).

Federal Aid Programs in Which Institution Participates



The ALLEN SCHOOL Office of Financial Aid is here to assist students and their families with the challenge of financing post-secondary education. It is important that you read all available information carefully and keep up-to-date on School policies. Staff is available in the financial aid office for walk-in assistance or by telephone at (718) 291-2200 main campus or 718-243-1700 (Brooklyn Campus). The ALLEN SCHOOL OF HEALTH SCIENCES participates in the following Federal Aid programs:

1. Federal Pell Grant
2. Federal Direct Stafford Loan
3. Federal Direct PLUS Loan

Application Process

The Free Application for Federal Student Aid (FAFSA) is the only required application. The federal formula is used to determine eligibility for financial aid, but please remember you must reapply each year you are seeking assistance.

You should not file before January 1. Applications filed before January 1 for the coming 2018-2019 will not be processed by the federal processor and will not be returned.

If you are offered and agree to borrow a Federal Stafford Loan, you will be required to complete an entrance interview explaining the aspects of the loan program before the funds can be released. In addition, you must complete a master promissory note (MPN) with your school.

Deadline Dates for Financial Aid 2018-19 Award Year

Federal Financial Aid

A FAFSA must be completed and processed no later than the 1st week of start in the program and no later than June 30th of 2019 (whichever comes sooner).

Dependency Status Questions on the 2018–19 FAFSA

All applicants for *federal student aid* are considered either “independent” or “dependent.” Dependent students are required to include information about their parents on the FAFSA. By answering a few questions, you can get a good idea of which category you fit into.

- Will you be 24 or older by Dec. 31 of the school year for which you are applying for financial aid?
- Will you be working toward a master’s or doctorate degree (such as M.A., M.B.A., M.D., J.D., Ph.D., Ed.D., etc.)?
- Are you married or separated but not divorced?
- Do you have children who receive more than half of their support from you?
- Do you have dependents (other than children or a spouse) who live with you and receive more than half of their support from you?
- At any time since you turned age 13, were both of your parents deceased, were you in *foster care*, or were you a ward or dependent of the court?
- Are you an *emancipated minor* or are you in a *legal guardianship* as determined by a court?
- Are you an unaccompanied youth who is *homeless* or self-supporting and at risk of being homeless?
- Are you currently serving on active duty in the U.S. armed forces for purposes other than training?
- Are you a veteran of the U.S. armed forces?

If none of the criteria listed above apply to you, you may be considered a *dependent student* and may be required to provide your parents’ financial information when completing the FAFSA. If you answered yes to any of these



questions, then you may be an *independent student*. You may not be required to provide parental information on your FAFSA.

What if I answered Yes to one or more of the questions above?

If so, then for federal student aid purposes, you're considered to be an independent student and will not provide information about your parents on the FAFSA.

What if I answered No to every question?

If so, then for federal student aid purposes, you're considered to be a dependent student, and you must provide information about your parents on the FAFSA.

Need-Based Awards

Eligibility for need-based financial aid is based on a need analysis. A formula established by Congress is applied to the information you provide on your application resulting in an expected family contribution (EFC). The difference between the budget; i.e. the annual costs of attending school (COA), and the EFC is your need (COA-EFC=Need).

Budget (Cost of Attendance)

Because there is more to pay for a student than tuition, the COA includes more than just tuition and fees. The elements that are included are: • Tuition • Fees • Room • Board • Books and Supplies • Transportation •

Available Financial Aid Programs

The financial aid awarded by the Financial Aid Office consists of the general categories: federal grants and federal loans. All programs are awarded based on the eligibility criteria established by federal or state laws and/or school policies.

GRANTS

Federal Pell Grant is a federal grant that does not have to be repaid. It is awarded based on the EFC calculated by the federal processor.

LOANS

Federal Direct/Stafford Loans are fixed interest rate loans made to students. Students are eligible for the following levels of awards: freshman \$3,500 subsidized and \$6000 unsubsidized.

PLUS loans are fixed interest rate loans available to the parents of dependent undergraduate students to help with educational expenses. Parent loans are based on credit approval. Parents may borrow up to an amount equaling the COA minus any other aid received. Repayment of these loans begins within 60 days after disbursement.

Other Aid Programs

If you receive a scholarship from a community group, business or other organization, please forward a copy of the award notice you received. The award must be accounted as part of your financial aid package, and we need you to



keep us informed. Obtaining scholarships can require a bit of research, but there are tools to help you with that research.

Good Web sites to try:

- www.fastweb.com
- www.finaid.org
- www.college-scholarships.com

C: APPLICATION PROCESSES

Prospective students and families can visit the school, or speak to our Office of Admission staff members. Application forms are available in the office. ALLEN SCHOOL admits as regular students only persons who have graduated from a school providing secondary high school education, or the equivalent (GED), or admits as regular students, persons who are beyond the age of compulsory school attendance, and have the ability to benefit from the training offered by the school. For students who do not have graduated from high school or met the equivalent requirement (GED) a signed statement is acceptable for foreign high school graduate who otherwise cannot provide a copy of the diploma due to circumstances beyond student's control. However, ALLEN SCHOOL OF HEALTH SCIENCES makes reasonable effort to collect transcript from the high school. If a student is selected for verification (V4 or V5) by the Department of Education, the student will be required to have a copy of the foreign high diploma or transcript evaluated in the US.

The Free Application for Federal Student Aid (FAFSA) is the only required application. The federal formula is used to determine eligibility for financial aid, but students must reapply each year they are seeking assistance.

The Office of Financial Aid provides assistance to students and parents in completing the FAFSA form. The complete FAFSA application and a valid ISIR serve as the basis for financial aid package for all qualified students. If requested by student and parent, the school submits the FAFSA electronically via EdConnect, FAA Online or the ECM Access to the CPS Online.

ISIRs are reviewed as they are received by the school from ECM Transmissions. The school contacts students and collects relevant documents to resolve any or all conflicting information and ensures completeness of the application. Similar steps are taken when students submit paper Student Aid Reports (SARs) or SAR Acknowledgements. It is checked to ensure that the school is named on the FAFSA. The financial aid office staff adds the school to the list to ensure the school receives Institutional Student Information Reports (ISIRs) electronically via ED Connect, or the ECM Access to CPS Online.

If unusual circumstances are identified during the application process, the school follows guidelines as prescribed in the Professional Judgment section of the manual.

Deadlines

The Federal deadline for submission of the Free Application for Federal Student Aid (FAFSA) is June 30 of the current year.

The last date by which federal loans can be processed to ensure compliance with cash management regulations and guaranty agency rules is June 30 for the current aid year.

Failure to complete the FAFSA application by the informed deadline will result to dismissal of the program and/or immediate demand of Tuition payment be paid prior to the continuation of the program.



Deadlines for submission of verification worksheets, relevant income verification documents and various comment code clearance documentation, etc. may vary. Students must speak to staff members in the financial aid office to find the required deadlines. Students are also informed of deadlines by telephone calls, emails, and general letters. Failure to provide required information by the informed deadline will result to dismissal of the program and/or immediate demand of Tuition payment.

Document Collection & Tracking

Students are informed of required documents when ISIRS are received and reviewed for accuracy and completeness. The office of financial aid monitors and follows up with those students who are yet to submit required documentation.

All required documents properly signed are submitted to the office of financial aid. The staff members are assigned to complete a review of the documents, take appropriate actions and file.

Incomplete documents are returned to the student for resubmission in completeness indicating and explaining what additional documents are required. The Director of Financial Aid is responsible to oversee all these processes.

File Review

Reviewing a student's file often involves more than just the verification process. In addition to verification, the financial aid staff members must review an applicant's file for database matches, reject codes, and "C" codes. The financial aid staff members must also review a student's file for other need analysis data elements that are not included in the federally required verification process but are designated as necessary verification data elements by the school. Schools must also review subsequent ISIR records for changes that may impact the applicant's aid eligibility. For these reasons, verification is considered under the broader process of file review. For more information please refer to

2018-2019 *FSA Handbook*, Application and Verification Guide.

Verification

The federal processor uses a system of edits, or flags, which produces a selection of certain applications for verification. If a student's application is selected for verification, this may mean that a data element in his/her application does not fit generally recognized patterns (not necessarily that the element is incorrect; it merely must be verified), or that the student was simply selected at random.

Federal financial aid cannot be disbursed until verification is complete. The Federal Direct/Stafford Loans may not be certified and processed until verification is complete. Estimated financial aid awards will be removed if verification is not completed within specified deadlines. Any deferred tuition and fees become due immediately. Students will be notified of any adjustments that need to be made. If the corrections are done electronically, the student will be sent an updated Student Aid Report (SAR) from the federal processor.



Selection of Applicants to be Verified

ALLEN SCHOOL OF HEALTH SCIENCES office of Financial Aid may also select files for verification if there appears to be a conflict of information. If a student is selected for verification, the student is notified on the Student Aid Report (SAR).

Verification must be completed no later than 90 days past the last day of your enrollment for each academic year. Corrections involving the federal processor must be made prior to mid-August.

The following students are excluded from verification.

- a) Applicants who die during award year (regardless of conflicting information)
- b) Applicants who are legal residents (or dependents of parents who are legal residents) of the Commonwealth of the Northern Mariana Islands, Guam, or American Samoa
- c) Applicants who are citizens of (and dependents of parents who are citizens of) the Republic of the Marshall Islands, the Federated States of Micronesia, or the Republic of Palau
- d) Incarcerated students
- e) Dependent students whose parents reside outside the United States and cannot be contacted by normal means of communication (exclusion is applicable to parental information only)
- f) An applicant who is an immigrant and arrived in the U.S. during either calendar year of the award year
- g) An applicant whose parents' address is unknown and cannot be obtained (exclusion is applicable to parental information only)
- h) A dependent applicant and both parents are deceased or physically or mentally incapacitated (exclusion is applicable to parental information only)
- i) An applicant who will not receive Title IV assistance for reasons other than the applicant's failure to verify the information on the application
- j) A transfer student who completed verification at the previous school and the current school obtains the correct information/data
- k) Any other applicants excluded from verification by the school

Based on manual ISIR review, those applicants or applications selected for verification are identified. Periodic review of the latest corrections and ISIRs monitors and ensures that all selected applicants are verified and appropriately documented.

Acceptable Documentation & Forms

- 2018- 2019 Verification Worksheet (Dependent or Independent V1 though V5) completed and signed.
- Signed copy of 2016 Parents' IRS Federal Tax Transcripts and all schedules for dependent students.
- Signed copy of 2016 Student's (and Spouse if applicable) IRS Federal Tax Transcript and all schedules (W-2 forms alone cannot be used for verification)
- IRS Transcripts are required if the student is selected for verification. If you or parent are not required to file, a letter from the IRS supporting statement. You can call the IRS at 1-800-829-1040 to retrieve a copy or request online. Ask for tax transcript for the calendar year of 2016. Untaxed income documentation (e.g., letters from the Social Security Administration to verify social security benefits, W-2 forms for contributions to retirement plans, etc.)
- Proof of child support paid and/or Government assistance will be required.
- SNAP benefits
- State ID permanent Residency or US passport accepted)
- Other documents as needed.



Verification must be completed no later than 90 days past the last day of your enrollment or 10 days from the students schedule graduation date (whichever is sooner) for each academic year. Corrections involving the federal processor must be made prior to mid-August. An applicant's failure to provide required documentation within the specified time frame may result in the loss of all Title IV aid and all balance tuition charges becoming due immediately.

For additional guidance please refer to the verification process as found in the *Application and Verification Guide* of ED's 2018-2019 *Federal Student Aid Handbook*.

Data Elements to be Verified

In the verification process, ALLEN SCHOOL OF HEALTH SCIENCE verifies the following data elements:

- ◆ Adjusted gross income
- ◆ U.S. taxes paid
- ◆ Household size
- ◆ Number of family members enrolled in a postsecondary educational institution
- ◆ Untaxed income
- ◆ Any institutionally selected data elements
- ◆ Child Support paid
- ◆ SNAP Benefits
- ◆ Government Assistance (TANF, Food Stamps)

The financial aid staff member is responsible for recording changes to verification data elements manually on a paper verification checklist. This ISIR Correction checklist is then faxed to ECM- third party service provider which electronically updates student records on the CPS online. The student SAR/ISIR records are thus resent or retransmitted to the CPS for reprocessing. After processing, when ECM receives the latest and corrected ISIRs, it sends them to school for review and filing.

All documents are filed in student's financial aid file in the school and retained for 5 years. For additional guidance regarding the verification process please refer to the *Application and Verification Guide* of ED's 2018-2019 *Federal Student Aid Handbook*.

Conflicting & Inaccurate Information

ISIR Review and Corrections

Errors can occur if the student submits the wrong information or if the information they provided was not scanned or entered correctly. In general, your school must have correct data before it can pay the student, which in some cases means that you or the student must submit corrections for reprocessing.

Dependency status: A student must update his dependency status any time during the award year unless it changed because his marital status changed. This update is required whether or not they were selected for verification. For the Pell Grant Program, the updated information must be submitted to the CPS for reprocessing.



Household size and number in college: Unlike dependency status, household size or number in college **cannot** be updated unless the student is selected for verification. If he is selected, these items **must** be updated to be correct at the time of verification unless they changed due to a change in the student's marital status, in which case updating is not permitted.

PROFESSIONAL JUDGMENT: An aid administrator may use professional judgment (PJ), on a case-by-case basis only, to alter the data elements used to calculate the EFC. The alteration is valid only at the school making it. You submit a PJ change electronically, via FAA Access to CPS Online or third-party software, and you may do it without a signature from the student or parent. The reason for the adjustment must be documented in the student's file, and it must relate to special circumstances.

How to handle discrepant tax data? The ED has already stated that financial aid administrators do not need to be tax experts, yet there are some issues that even a layperson with basic tax law information can evaluate. Because conflicting data often involve such information, financial aid administrators must have a fundamental understanding of relevant tax issues that can considerably affect the need analysis. You are obligated to know: (1) whether a person was required to file a tax return, (2) what the correct filing status for a person should be, and (3) that an individual cannot be claimed as an exemption by more than one person. Publication 17 of the IRS, *Your Federal Income Tax*, is a useful resource for aid administrators. You can view it on the Web at www.irs.gov or you can call the IRS at 1-800-829-3676 to order a copy. For example, a Financial Aid Administrator noticing that a dependent student's married parents have each filed as "head of household" (which offers a greater tax deduction than filing as single or married) must question whether that is the correct filing status. Publication 17 explains on pp. 21–23 the criteria a person must meet to file as head of household. Resolution of the conflict may be a reasonable explanation of why there appears to be a conflict but is none, or the parents may re-file and submit a copy of the amended return.

Is a school obligated to resolve conflicting information? The school must resolve all such conflicting information, except when the student dies during the award year. If your school has conflicting information concerning a student's eligibility or you have any reason to believe a student's application information is incorrect, you **must** resolve the discrepancies before disbursing FSA funds. If you discover discrepancies *after* disbursing FSA funds, you must still reconcile the conflicting information and take appropriate action under the specific program requirements.

Do I have to resolve conflicting Information? You may not disburse aid until you have resolved conflicting information, which you must do for any student as long as he is at your school. Even if the conflict concerns a previous award year, you must still investigate it. You have resolved the matter when you have determined which data are correct; this might simply be confirming that an earlier determination was the right one. Of course, you must document your findings in the student's file and explain why, not simply assert that, your decision is justified.

What should your school do if a tax return isn't available?

The student must instead submit a copy of any IRS form that lists tax information and provides the information needed for verification. The form **must** be signed by the student unless the IRS sent the form directly to the school. A common form is the tax transcript. A student can order one by calling the IRS at 1-800-829-1040 and following the directions below or by completing and mailing Form 4506-T, *Request for Transcript of Tax Return*. If the transcript does not have as much financial information as the

How to obtain a tax transcript or a copy of a return?

The student can obtain a copy of an IRS Transcript by contacting the IRS at 1-800-829-1040 or by requesting a copy online on the IRS website www.irs.gov.

What is a completed and acceptable tax document?

For verification purposes, you can accept a copy of a signed IRS tax transcript.

In the event school discovers fraudulent activities and misrepresentation of facts in the FAFSA application, it refers suspected fraud to ED's Office of Inspector General (OIG) under the Section 668.16(g)(1) of the federal regulations.



Student Notification of Verification Changes

The Office of Financial Aid notifies students in writing of the results of verification if, as a result of verification, the applicant's expected family contribution (EFC) changes and results in a change in the applicant's award or loan amounts.

The changes in the applicant's award or loan amounts are revised in the packaging worksheet/estimated financial aid and documented in student file. For details please refer to the award letter/package notification section of the manual.

Database Matches, Reject Codes, & "C" Codes Clearance

The Office of Financial Aid must review the latest ISIR or the copy of Student Aid Report (SAR) as it receives from ECM or student for the following vital information for their correctness and accuracy.

- Social Security Number
- Citizenship Status
- Selective Service
- Drug Offense Conviction
- Name and DOB mismatch
- NSLDS Default/Over award

Review of Subsequent ISIR Transactions

The Office of Financial Aid review subsequent Institutional Student Information Record (ISIR) transactions as they receive from ECM and complete review within one week to ensure correctness of the information based on the corrections made in the previous transaction.

The subsequent ISIR transactions are identified as the office of financial aid receives ISIR printouts from ECM, the school's third party service providers. The financial aid staff members responsible for ISIR reviews, check for subsequent verification, "C" code problems, unauthorized student changes etc. The student if necessary is then contacted in writing or via telephone call to provide documentations to resolve issues and conflicting information containing in the latest ISIR. If a student becomes ineligible for any or all Title IV aid, they are cancelled immediately, R2T4 is then processed and the student is notified.

Additional Institution-Specific Data Elements

It is important to note that the ALLEN SCHOOL OF HEALTH SCIENCES uses only federally-required verification data elements to calculate a student's aid eligibility.

Professional Judgment (PJ)

PJ Authority & Individuals Who May Exercise It

As per the Higher Education Act (HEA) 1965, the Director of Financial Aid exercises discretion in a number of areas to change data used in determining financial aid eligibility when a student has special or unusual



circumstances. This authority is known as “professional judgment.” It allows the director to treat a student individually when extenuating circumstances and conditions exist that differentiate that student from a class of students. The professional judgment (PJ) decisions are made on a case-by-case basis as the result of examining a particular student’s unique circumstances.

The PJ is exercised usually before packaging, if warranted, at the time of ISIR or FAFSA application review. Sometimes it may be done when conflicting and inconsistent information on the ISIR is resolved. For more information check the file review, verification, and conflicting and inaccurate information sections of the manual.

Circumstances Where PJ May be Used & Possible Actions

The Director of Financial Aid can exercise discretion in certain areas when a student’s family has special or unusual circumstances that are not adequately addressed by the need analysis system, regulations, or legislation. ED does not regulate PJ. The section 479A of HEA 1965 gives authority to the financial aid administrator to exercise PJ in the following areas:

- A. Dependency status (dependent to independent only)
- B. Certain data elements used to calculate the expected family contribution (EFC)
- C. Cost of attendance (COA)
- D. Satisfactory academic progress (SAP)
- E. Denial or reduction of FFEL and Direct Loan eligibility
- F. Unusually high medical or dental expenses not covered by insurance or accounted for in the need analysis formula under the Income Protection Allowance (adjust EFC)
- G. Unemployment (adjust EFC)
- H. Abusive family relationships (adjust dependency status)
- I. Unusually high child care expenses (adjust either EFC or COA)
- J. Natural disasters that impact a family’s income or assets (adjust EFC)

Professional Judgment and Dependency Override:

If you make the decision to use Professional Judgment or to perform a Dependency Override, you **MUST** keep all the documentation in the file.

Also, according to the U.S. Department of Education’s Colleague Letter on the subject of Dependency Override’s, they stated the following:

A financial aid administrator has the ability to make a documented determination of independence based upon "unusual circumstances." Dependency Override decisions should focus on truly exceptional circumstances and consideration of individual cases, rather than contradicting the fundamental principles of independency. Dependency Override decisions in a situation when a student's parent cannot be located, or where an otherwise dependent student has been a victim of domestic violence and is no longer residing with his or her parents are good examples of "unusual circumstances."

The Department of Education has identified four conditions that, individually or in combination with one another, DO NOT qualify as "unusual circumstances" and DO NOT MERIT a dependency override.

Circumstances are:

1. Parents refusing to contribute to the student's education;
2. Parents unwilling to provide information on the application or for verification;
3. Parents not claiming the students as a dependent for income tax purposes;
4. Student demonstrating total self-sufficiency.



The law also requires that a determination of unusual circumstance(s) must be made each award year.

Financial Aid Administrator's Written Determination

The written documentations from at least two third-parties who are not family members are generally required for supporting a student's unusual circumstances. If possible a letter or two from other persons to substantiate the facts in the student's letter should be obtained. (A letter from a pastor, guidance counselor, doctor, landlord, or other outside person would be helpful). After reviewing all relevant documentation related to a student's assertion that there are unusual circumstances that support why he or she should be considered to be independent rather than dependent, the financial aid administrator must make a specific determination for the student. Upon making such a determination that a dependency override is warranted, the financial aid administrator must prepare a written statement of that determination, including the identification of the specific unusual circumstance upon which the financial aid administrator based his or her determination. The institution must maintain this documentation and the supporting documentation used to make each determination.

The student must submit a signed statement explaining the circumstances that led him/her to current situation and surrounding the fact that they do not live with their parents. In the letter explain where the parents are located. The letter must state the "unusual circumstance" of why they are no longer living with their parents. For example court documents regarding legal guardianship or other situations are excellent pieces of documentation. Federal and state tax returns are also treated as excellent documents to verify income information. The student also completes a form called 'Monthly Income and Expense Worksheet'. This form and the dependency override instructions are available in the Office of Financial Aid.

Then the Director of Financial Aid completes a professional judgment form after reviewing all the documentation for approval.

The Director of Financial Aid is responsible for making changes to the ISIR data elements manually based on PJ. The student SAR/ISIR records are thus resent or retransmitted to the CPS for reprocessing. After processing, when ECM receives the latest and corrected ISIRs, it sends them to school for review and filing.

Request for PJ Consideration

The students and parents depending on the areas of professional judgment indicated above may submit request for a professional judgment call. All requests must be in writing and submitted within the term of enrollment or as soon as the situation arise to the Office of Financial Aid. The Office will not accept any incomplete application. The student or parent is notified in writing once the request is approved or denied. If the PJ resulted in a revised award package, student also receives a revised award notification by mail.

There are circumstances where PJ would not be used such as an independent student cannot be made dependent, a change cannot be made to the Federal Methodology need analysis formula, post-enrollment costs cannot be added to a student's budget etc.

D: AWARDING FINANCIAL AID

Various Student Populations

The terms budget, cost of attendance (COA), and cost of education are synonymous. ALLEN SCHOOL use the term 'budget'.



ALLEN SCHOOL constructs separate budgets for two categories below:

Category I

1. Independent students with dependents other than a spouse
2. Single independent students
3. Married independent students without other dependents
4. Dependent students/living by their own

Category II

1. Dependent students/living with parents
2. Single independent students/living with parents

The financial aid staff members manually assign a budget to each student based on information available in the latest ISIR and school admission records. Budget assignments are verified for accuracy by comparing the student's enrollment status from admission and registration records and ISIR information.

How Budgets are Derived & Updated

ALLEN SCHOOL OF HEALTH SCIENCES uses the following federally-mandated basic components to derive a student budget. These basic components are:

- ◆ Tuition and fees
- ◆ Books and supplies
- ◆ Room and Board HEA
- ◆ Transportation HEA
- ◆ Miscellaneous HEA

Tuition and Fees are determined by the Board of Directors annually based on last years' administrative and operating costs, and inflation adjustments. The following calculations based

on the average costs resulted from the cost of living survey, student questionnaires, and surveys are used every year by June 30 to determine the annual Cost Of Attendance budget (9 month period) for Room and Board, Transportation and Miscellaneous components for the upcoming academic year.

See estimated financial aid and cost of attendance at ...

<https://www.allenschool.edu/annually-updated-documents/>

The assigned budgets are discussed with student during the financial aid counseling session and documented in a form called 'Estimated Financial Aid and Budget' form. The student accepts and signs the form and receives a copy of it. The form is kept in student file for future reference.

Packaging Philosophy

The staff in the Office of Financial Aid at ALLEN SCHOOL OF HEALTH SCIENCES is dedicated to assisting students and their families to open the doors to a quality private education to enhance the quality of work life. While the primary responsibility of meeting college costs rests with the student and family, our financial aid professionals under the leadership of the Director of Financial Aid seek to maximize financial aid opportunities by providing guidance and information about scholarships, grants, loan programs, student employment, and payment options. More than 90 percent of ALLEN SCHOOL OF HEALTH SCIENCES' students receive financial aid, take advantage of different payment options, or participate in the Direct/Stafford loan programs.



To obtain maximum consideration for financial aid, the student and family must learn:

- About eligibility for various funding programs that are available.
- To follow instructions provided on various application forms and other materials.
- To pay careful attention to deadline dates.

Timely submission of application forms and other required documentation will enable our staff to process student's requests accurately and in a timely fashion for the start of classes.

Available Amounts & Number of Eligible Students

ALLEN SCHOOL OF HEALTH SCIENCES participates in the following federal and state financial aid programs:

Federal Pell Grant is a federal grant that is awarded based on the EFC calculated by the federal processor. In the 2016-2017 award year, the average Pell grant award amount was \$3764 and the number of students funded was 1412 (ALL ALLEN SCHOOL CAMPUSES COMBINED).

Federal Direct/Stafford Loans are fixed interest rate loans made to students. Students are eligible for the following levels of awards: freshman \$3,500 subsidized. The unsubsidized loan amount is up to \$2000 if dependent or \$6000 for independent or for dependents whom, Parent Loan (PLUS) is denied. All loans have to be repaid in monthly installments in 10 years starting six months after graduation or discontinuation of enrollment below half time. In the 2016-2017 the average Loan amount was \$7349 and the number of students funded was 1196 (ALL ALLEN SCHOOL CAMPUSES COMBINED).

PLUS loans are fixed interest rate loans available to the parents of dependent undergraduate students to help with educational expenses. Parents may borrow up to an amount equaling the budget minus any other aid received. Repayment of these loans begins within 60 days after the first disbursement.

Campus-Based Programs Amounts

ALLEN SCHOOL OF HEALTH SCIENCES is entitled to deduct an administrative cost allowance (ACA) for its all approved campus-based program that it participates. The ACA is used for institutional expenses incurred to administer these programs. The ACA for all programs is deducted from all of the individual programs.

ECM the third-party service provider for ALLEN SCHOOL OF HEALTH SCIENCES is responsible for handling the ACA and notifies school as and when required.

Determining Award Amounts

ALLEN SCHOOL OF HEALTH SCIENCES participates in the Federal Pell and Direct Loan program at this time. The financial aid staff members determine the amount of Pell and Loan based on the EFC (expected family contribution), student's budget and estimated financial need. Although students and parents can borrow up to their total budgets, ALLEN SCHOOL OF HEALTH SCIENCES encourages students to keep their federal direct loan borrowing to the minimum.

The Financial Aid Director and the school's third party service provider ECM monitors all campus-based program fund balances not only to ensure funds are fully utilized but also to avoid over expenditure of funds. This is a



collaborative effort between the school and ECM. ECM imports/exports all electronic T4 funding including G5, COD and CPS transactions.

Package Construction

The Office of Financial Aid must have and follow consistent packaging policies. All accepted and eligible students are awarded equitably and consistently within established need parameters. The estimated financial aid need is determined by subtracting expected family contribution from the student's budget. All outside resources and grant/scholarships are considered as part of the financial aid package.

All eligible students receive an estimated financial aid package as soon as they are accepted and the FAFSA application is completed and processed. No Title IV aid can be requested to ECM to be disbursed and credited to student's ledger card until verification, file review, reject codes, 'C' codes issues are resolved. Once the student's Federal Pell and Federal Direct/Stafford Loans are processed, ECM generates a Title IV Award Notification and sends to School to be notified to student and filed.

The Director of Financial Aid is responsible for overseeing the packaging process. ECM, school's third party service provider conducts annual file review to ensure school is within Title IV, state and institutional compliance.

Packaging Other Educational Resources

All outside scholarships and grants are treated as part of the financial aid package. The financial aid office is notified by the Office of Student Accounts in the event any student receives outside scholarship, grants or other educational cash benefits. Adjustment must be made to ensure no student is over-awarded. For details refer to the over-award section of the manual.

Award Package Notification

All students who have been packaged are notified through email, mail or during the financial aid counseling session. The award notification provides student's budget, indicates the expected family contribution (EFC), the student's total need and remaining need amounts. It also indicates the enrollment period, terms, or payment periods as they relate to awards and their disbursement for student costs. The award notification also provides detailed information describing the amount and type of aid awarded and any conditions linked to award eligibility for each type.

Packaging Appeals

If a student wishes to appeal, he/she may do so in writing along with all relevant and supporting documentations within 14 days of the receipt of such award notification. All appeals must be sent directly to the Director of Financial Aid. The Director of Financial Aid reviews the appeal, makes determination and adjust award package if necessary within two weeks from the date the appeal is received. The student is informed of the appeal process in writing.

Award Package Notification Revisions

Certain conditions such as changes in program of study or enrollment status, additions of outside grants/scholarships may arise that might require an award package notification revision. The Director of Financial Aid is responsible for



overseeing this process. Generally the budget is reviewed first and then the loan, if required, is revised. The revision is done manually in a packaging worksheet labeled as 'Revised Packaging Worksheet'.

For details please refer to the award package notification and over-reward sections of the manual.

Over-Awards

The financial aid office must ensure that a student does not receive more Title IV aid than the amount for which he or she is eligible. Over-award is defined as the offered financial aid that exceeds student's budget and unmet need. Over-awards can occur for a variety of reasons such as change of program, and enrollment status, receipt of outside scholarships, packaging errors caused by school etc. For example, in a situation where a student did not report receipt of an

outside scholarship to the financial aid office; but the student accounts office reports receipt of those funds to the aid office, an over-award is discovered and must be resolved.

Resolving an Over-Award When Student is Liable

The financial aid package is adjusted to correct any over-award situation by reducing or canceling award(s) and returning loan proceeds that have not been credited to the student. The student is then notified in writing and a revised award notification is sent. The Federal Pell Grant awards are not reduced to resolve over-awards of campus-based or Direct Loan funds. When the school has determined that the student is liable for the over-award, he/she is notified in writing regarding his/her obligation to return those funds.

Resolving an Over-payment When School is Liable

When students are not liable for any Title IV funds overpayments caused by school error and that such overpayments cannot be corrected by reducing subsequent disbursements, ALLEN SCHOOL OF HEALTH SCIENCES immediately will process return within 45 days (30 days for Arizona) of such discovery of an overpayment situation.

E: DISBURSING FINANCIAL AID

Disbursement Process

In accordance with the cash management regulations, ALLEN SCHOOL OF HEALTH SCIENCES assigns two organizationally independent entities to handle the two related but distinct functions of awarding and authorizing payments and disbursing (or delivering) Title IV funds. No one office alone is responsible for both functions. While the Office of Financial Aid after resolving all pending student eligibility issues awards and authorizes Title IV fund payments to students, ECM- the Third-party service provider for the school upon receipt of the 'Data Input Form' from the Office of Financial Aid, disburses or delivers the Title IV funds. The Office of Student Accounts is responsible for crediting such payments to student's accounts upon receipt of such funds from ECM. This requirement is taken so seriously by the School that the individuals responsible for each of these functions may not be related to one another, nor may they together exercise substantial control over the institution.

For all outside scholarships, grants, resources that are counted as part of financial aid package the financial aid office is notified by the Bursar's office and/or student.



The Student Accounts Office uses monthly attendance reports, and other reports generated by the academic dean to verify the identity and enrollment status of students, endorsement requirements, student notifications, and timely delivery of credit balances. The Office of Financial Aid Offices receives monthly all updated Student Ledger Cards from Bursar's Office.

Definition of Disbursements & Disbursement Methods

The financial aid office staff members are trained and made fully aware of the school's policies and procedures regarding what constitute a disbursement and disbursement methods even though these activities are under the supervision of SME and Financial Aid Managers. This awareness of ALLEN SCHOOL OF HEALTH SCIENCES's practices ensures better counseling of students and clearer instructions from the aid office.

ALLEN SCHOOL policies regarding disbursement of Title IV funds are that the School credits individual student accounts only after the ECM disburses Title IV funds. ALLEN SCHOOL OF HEALTH SCIENCES does not penalize any Title IV recipients for nonpayment of fees due to financial aid regulations or delays attributable to the school.

Disbursement Dates & Schedules

ALLEN SCHOOL OF HEALTH SCIENCES prepares a roster for disbursement dates and schedules for all its programs that are eligible to participate in Title IV aid programs. See 2018-2019 *FSA Handbook* for details on the federal regulations.

Although ALLEN SCHOOL OF HEALTH SCIENCES discourages late disbursements, however, in the events where late disbursements and post-withdrawal disbursements are necessary, the financial aid office looks at individual students and determines such eligibility for late disbursements or post-withdrawal disbursements as per 668.164(g) of HEA 1965.

Student & Parent Authorizations

ALLEN SCHOOL OF HEALTH SCIENCES must have the students and PLUS borrowers written authorization to:

1. Hold excess Title IV funds (credit balances) 668.165(b)(1)(iii), 675.16(a)(4)(ii)

Holding Excess Title IV Funds (Credit Balances)

FINANCIAL AID STATUS AND WAIVER	
I hereby authorize the Allen School of Health Sciences to credit my Title IV payment(s) (Pell Grants, Stafford Loans) toward my school charges incurred in addition to my tuition and fees. These school charges can include, but are not limited to: books, supplies, equipment, tools, etc.	
I understand that I have the right to refuse to authorize any of the items on this statement.	
_____ Student	_____ Date



Signature

AUTHORIZATION TO REDUCE TITLE IV LOAN DEBT

I (student) hereby authorize the return of any credit balance remaining on my account, regardless of the source, at the end of an award year, end of a loan period, or at the end of my enrollment to my Title IV student loans in order to reduce my overall student loan debt. I understand that this authorization is voluntary and may be rescinded at any time in writing.

If rescinded, I must inform the school in writing and will then receive a refund of any credit balance existing at that time within 14 days.

Student Signature _____ Date _____

Under certain circumstances, schools are required to provide notifications to students and PLUS borrowers. The Bursar or Financial Aid Office of ALLEN SCHOOL OF HEALTH SCIENCES must notify:

- a. Students of their eligibility for funds from each of the Title IV programs and provide payment information 668.165(a)(1)(i), 675.16(a)(2)
- b. If the school disburses Title IV loan proceeds (other than FFEL proceeds the lender disbursed to the school by individual check) by crediting the student’s account,
- c. Notify the borrower of the disbursement date and amount, his or her right to cancel all or a portion of the loan, and the procedures for requesting cancellation 668.165(a)(2).
- d. If the school made a post-withdrawal disbursement containing loan proceeds (other than FFEL proceeds the lender disbursed to the school by individual check) by crediting the student’s account, notify the borrower of the disbursement date and amount, his or her right to cancel all or a portion of the loan, and the procedures for requesting cancellation 668.22(a)(4)(i)(B)

The Student Accounts office offers a student (or PLUS borrower) any portion of a post-withdrawal disbursement not credited to the student’s account, and notifies the student and PLUS borrower of the procedures for requesting the un-disbursed funds as per 668.22(a)(4)(ii), 668.165(a)(2)-(5), 668.22(a)(4)(i)(B) 668.165(a)(2)-(5) of HEA 1965. In all the events indicated above, if cancellation and/or reduction of loans are necessary, the student and parent must notify the school within 14 days from the receipt such notice. If the school does not receive any request within 14 days, it will assume both student and parents have accepted full disbursements and allowed school to credit student’s account.

Title IV Eligibility & Payment Information

Financial Assistance and Financial Aid & SAP

For continued financial aid eligibility, the student must maintain satisfactory academic progress in his/her program of study. Financial aid is distributed based on financial need as determined from information supplied on the Free Application for Federal Student Aid (FAFSA.) Applicants may contact the institution’s Office of Financial Aid for specific information regarding the availability of Financial Aid. All student aid is credited to the student’s account each term of enrollment. Students must attend



90% of time offered during the current payment period, or subsequent payment periods in order to disburse 2nd and subsequent disbursements. Students may be packaged using a combination of Grants (no repayment), Student Loans (repayment required) and Institutional Interest-Free Loans (pay-as-you-go). Information regarding your individual financial aid package may be obtained by speaking with a Financial Aid Advisor at the location of attendance. The staff is available in the Financial Aid Office from 9:00 a.m. through 7:30 p.m. EST Monday through Thursday.

ALLEN SCHOOL OF HEALTH SCIENCES' Office of Financial Aid and Bursar Office notify all students of the amount he or she can expect to receive from each of the Title IV programs, including PLUS, and providing the student with required information regarding the payment of those funds such as the payment method, expected amount, expected date of disbursement, etc.

The written notification is sent to students via mail or email when all financial aid awarding processes, submission and review of all supporting documentations are complete and students' eligibility is confirmed. The Office of Financial Aid sends notification regarding the expected award amounts. The Student Accounts Office is responsible for sending the notification regarding the payment method and expected date of disbursement as per 668.165(a)(1) and 675.16(a)(2) of HEA 1965.

Offering Post-Withdrawal Disbursements Not Credited to Student's Account

ALLEN SCHOOL OF HEALTH SCIENCES notifies the student and PLUS borrower of post-withdrawal disbursements not credited to the student's account and of the procedures for requesting the un-disbursed funds in writing. If the fund has to be cancelled or reduced, the borrower must request so within 14 days from the receipt of such notification from the Bursar's Office.

The Student Accounts Department Office must generate a report to review the group of such students and monitors the 14 day time period to comply with the regulations 668.22(a)(4)(ii) and 668.165(a)(2)-(5) of HEA 1965.

F: Satisfactory Academic Progress Policy (SAP) (Applies to all Title IV and Non-Title IV Students)

The Satisfactory Academic Progress standards established by the Office of Academic Affairs are summarized below.

To be eligible for Title IV aid and/or VA benefits, a student must maintain satisfactory academic progress (SAP). These SAP policies determine the academic standards that students are expected to meet and clearly define the method by which the achievement of those pace (pace is the rate necessary to complete each program within its specified maximum time frame) and qualitative standards are calculated. If the student has made acceptable pace and qualitative progress for the respective payment period in which SAP was evaluated, then the school reviews the 150% of the maximum allowable time frame criterion to measure the student's Satisfactory Academic Progress.

All students must maintain Satisfactory Academic Progress to continue enrollment. Satisfactory Progress is measured at the end of each payment period, and will be validated prior to disbursement of aid.

Pace (Quantitative) Measure of Satisfactory Academic Progress (SAP)



Allen School of Health Sciences' Satisfactory Academic Progress policy contains a pace measure. The policy defines the pace at which our students must progress to ensure educational program completion within the maximum timeframe of 150%. For programs measured in credit-hours, the maximum time frame would be 150% of the published length of the educational program as measured in credit hours. For programs measured in clock-hours, the maximum time frame is no longer than 150% of the published length of the educational program as measured in the cumulative number of clock hours the student is required to complete.

Program-Specific Pace Timeframes

All students must satisfactorily complete their program within 150% of the normal timeframe as indicated below.

Program Name

Normal

Maximum

Medical Assistant

36 weeks

54 weeks

Medical Insurance Billing and Coding

(Certificate Program)

36 weeks

54 weeks

Medical Insurance Billing and Coding

(Associate's Degree Program)

60 weeks

90 weeks

At the midpoint of the maximum timeframe, students must have successfully completed 1/2 of the program's credit/clock hour requirements.

For example: The maximum timeframe for the Medical Assistant program is 54 weeks. The total clock hours needed for completion of this program are 900 semester clock hours. By the time the student has been in the program for 27 weeks (1/2 of the maximum time frame), he/she must have completed at least 450 clock hours. This time frame is applicable for all students including those who do not receive financial aid.

Students who fail to meet the pace requirements will be placed on Financial Aid Warning. The student is then required to meet with their Academic Advisor and a Financial Aid Advisor. If there is no improvement over the next payment period, those students will be dismissed from their program for not maintaining SAP.

Leave of Absence does not calculate into the weeks of SAP calculation for 150%.

Qualitative Measure (GPA) of Satisfactory Academic Progress (SAP)

Allen School of Health Sciences follows a qualitative measure of determining SAP. In order for students to successfully meet this qualitative measure, they must maintain a GPA of at least 2.0 at the completion of each module. The Office of Financial Aid receives qualitative information about Title IV recipients from the Office of Academic Affairs. The qualitative SAP progress is reviewed manually and a copy of the latest transcript is kept in the student's file. The Office of Financial Aid notifies students in writing of their progress or lack of progress at the end of each payment period.

Financial Aid Warning

45/61 RM 7-1-18



Allen School of Health Sciences evaluates Satisfactory Academic Progress at the end of each payment period. If a student falls below a 2.0 GPA or if the student is not completing the required amount of hours/credits to maintain pace with the requirements for graduation within the 150% time frame, the student will be placed on Financial Aid Warning for one payment period. A student who is placed on Financial Aid Warning can continue to receive Title IV aid for the next payment period after they receive the warning status.

A student who loses their financial aid eligibility due to not making SAP at the end of a financial aid warning has the right to file an appeal regarding their SAP Evaluations.

A student, who wishes to appeal Academic development Status and loss of Title IV, HEA eligibility, must submit a written request to the School Director within five (5) business days of being notified that they are in a non-satisfactory progress status.

Financial Aid Probation and Appeal Process

If a student does not make Satisfactory Academic Progress by the end of the Financial Aid Warning period (They have not maintained SAP for two consecutive payment periods), the student will be dismissed for not maintaining SAP.

A student may file an appeal of the SAP dismissal due to a death in the family, illness, or other extenuating circumstances. A written, detailed explanation of the circumstances along with a specific improvement plan must be submitted to the Director, Academic Affairs. The appeal must then be approved by the Director, Financial Aid, and the Campus Director. The student will receive a written notification as to the decision of his/her appeal within fifteen (15) business days following the receipt of the appeal.

Students who have their appeal approved will be placed on a SAP Probation status. Students on SAP Probation who fail to make Satisfactory Academic Progress by the next payment period will lose financial aid eligibility and be dismissed from the program with no option of appeal.

Reestablishment of Status

A student determined NOT to be making Satisfactory Progress may reestablish Satisfactory Progress by: 1) Making up missed tests and assignments and increasing grade average to 70% or better, and/or 2) Increasing cumulative attendance to 80% by the end of a Warning or Probation period.

Reinstatement of Financial Aid

Title IV, HEA aid will be reinstated to students who have prevailed upon appeal regarding the status of SAP or who have reestablished SAP. Students on suspension of funds will be monitored daily via an electronic SAP report to determine when they reestablish SAP.

Course Incompletes, Repetitions and Non-Credit Remedial Courses Course incompletes, repetitions and non-credit remedial courses have no effect on the student's GPA.

Re-Entry Students/Interruptions

Students who have been terminated or withdrew from school may re-enroll (if determined eligible) within 364 days and will not incur additional charges, however these students will be responsible to pay any remaining balance from the previous enrollment that cannot be covered with reinstated federal funds.

Students who have been terminated or withdrew from school and re-enroll (if determined eligible), after more than 365 days will pay a registration fee and will be charged for contracted hours at the current tuition rate. All re-enrolling students will be provided the school's re-enrollment policy and will be evaluated by the school Director for



placement in the curriculum and kit needs. Re-enrolling students may be required to purchase the current school kit. Students applying for re-entry or transfer-in from other schools will be required, as a condition of enrollment, to bring delinquent prior student loans to a current status.

The student may appeal a negative Satisfactory Progress determination according to the appeal policy. Students re-entering after exiting the school will not be evaluated as new students and consideration will be given to the student's progress status at the time of previous withdrawal. Re-enrollment is at the discretion of the school administration.

Reinstatement

A prior student requesting to be reinstated as an active student should do so in writing. Supporting documentation and/or information concerning any mitigating circumstances should be noted in the request. Reinstatement requests should be presented to the respective campus registrar. The requesting prior student shall be notified of the Reinstatement Review within 14 days following the decision of the Campus Director.

Attendance

Attendance/Assessment of Substantive Interaction (instructor-led class time) is reviewed daily to ensure compliance with applicable regulations. ALLEN SCHOOL OF HEALTH SCIENCES strongly recommends that students **attend all classes**. Students who miss more than 10% of their scheduled class time within a given payment period may be placed on attendance probation and may be at risk of losing financial aid. Students who remain above the 10% allowable absence threshold may be dismissed.

The Institution is preparing students for employment. Employers will not tolerate excessive absence; being present and prepared is critical for academic and professional success.

In campus-based classrooms, attendance will be taken within the first 15 minutes of the first period and within the first 10 minutes of all other periods of class. Only students present during this time will be marked "Present." All others will be marked "Absent."

Medical Assistant attendance will be taken within the first 15 minutes of every class period. Each period will be facilitated by an Instructor via live, online sessions similar to a classroom setting.

Student Make-Up Procedure

Description

This process details the steps taken to ensure students are proactively contacted to make-up missed class *time*.

Standard Process Events/Activities

1. **Step 1** – A student is identified as having to complete make-up time by one of the following:
 - a. Identified in daily attendance report (sent by registrar) as being absent from one or more periods during the previous day.
 - b. Student contacts their Enrollment Coordinator due to having missed a class that has passed or in preparation of having to miss a future class.
2. **Step 2** – The Enrollment Coordinator works with the student to place them into a make-up session offered at different times Monday through Saturday.
3. **Step 3** – The Enrollment Coordinator sends out the activity "SEM – Make-Up Attendance Notice" to the General Make-Up instructor via Campus Vue. This activity alerts the instructor of a student who will be attending their session, and the course, day, and period(s) for which they need to make-up time.



4. **Step 4** – The General Make-Up time instructor sends the following activity (AD – Make-Up Attendance Form) to the online registrar, listing the student that attended, the class(es) for which they made up time, and for how many periods they attended.

School Holiday Calendar

New Year's Day
Martin Luther King, Jr. Birthday
Good Friday
Memorial Day
Independence Day
Labor Day
Thanksgiving
Day after Thanksgiving
Christmas Eve
Christmas Day

Transcript Requests

Transcripts are issued to graduates who have met all institutional requirements. Official transcripts must be requested in writing. Official transcript requests may be made by submitting either a completed official transcript request form or a letter that contains the following information: name, student identification number, dates of attendance, campus, name while enrolled, and complete address of recipient to the Registrar. Transcript request forms are available in the Registrar's Office. A \$10.00 fee is charged for each official transcript. No official transcripts will be provided to students who have a past due balance due to the school.

All requests for official letters of attendance, progression, and academic status should be submitted to the Office of the Registrar.

Transfer Hours

The ALLEN SCHOOL OF HEALTH SCIENCES will count transfer hours/credits that apply toward the student's current program in determining Satisfactory Academic Progress transfer hours. Satisfactory Academic Progress transfer hours will be counted as both hours attempted and hours completed. A student who changes his/her program will be considered as a transfer student into the new program.

Transcripts from other accredited institutions or colleges will be evaluated and credit will be given for the appropriate units of instruction upon approval by the appropriate administrator for the program in question.

Student who resume into the program

All applicants must complete the re-admission process that includes **writing an essay and/or taking an assessment test for consideration for re-entry.**

A student may only apply for re-admission twice during his/her entire academic career.



Leave of Absence

Leave of Absence (LOA) refers to a specific period during an ongoing program when a student is not in attendance. The Allen School does not accept LOA request.

Dismissal

Students may be dismissed for the following reasons:

- Not maintaining a cumulative GPA of 2.0 and/or maintaining 80% cumulative attendance
- Violating the code of conduct
- Failing attendance probation
- Did not return from Leave of absence (LOA)

The dismissal date used to determine when the student is no longer enrolled at the ALLEN SCHOOL OF HEALTH SCIENCES is the date indicated in written communication by the student to the Registrar's Office. If a student does not submit written notification, the school will determine the student's withdrawal date based upon federal regulations and institutional records.

For Federal student loan reporting purposes, the student's last date of attendance will be reported as the effective date of withdrawal for both official withdrawals and those who do not complete the withdrawal.

All Students:

For all students, the last date attended will be considered the withdrawal date. If financial aid has been disbursed prior to a student's withdrawal or dismissal from class, the student could be responsible for repayment to the school (as stated by ALLEN SCHOOL OF HEALTH SCIENCES refund policy) and to the Title IV program. This could jeopardize future financial aid at ALLEN SCHOOL OF HEALTH SCIENCES and at other institutions if repayment is not made. The return of Title IV fund process will not be calculated unless the student's financial aid file is complete. The student has 30 days to complete the file. Students will automatically be dismissed after 14 calendar days (10 consecutive business days of non-attendance).

Withdrawal from School

Students wishing to terminate their program of training before the end of the program must take the following steps:

1. Obtain withdrawal form from the Office of the Registrar
2. Return all school-owned books and supplies.
3. Provide current address to the Office of the Registrar.
4. Return withdrawal form signed by Student Services personnel for official clearance.

Change of Address

At any time that a student's residence, mailing address and/or phone number changes, it is the responsibility of the student to inform ALLEN SCHOOL OF HEALTH SCIENCES of the new address/telephone number. The efforts of the school depend upon accurate information. The student must obtain a Change of Address form from the Office of Academic Affairs and submit the correct information. ALLEN SCHOOL OF HEALTH SCIENCES will not be responsible for any information not received by the student if a change of address form has not been turned in.



G: R2T4 & SCHOOL REFUNDS

Process Overview & Applicability

The return of Title IV funds requirement is a complex process involving a great deal of interoffice cooperation and coordination at ALLEN SCHOOL OF HEALTH SCIENCES and between the school and its third party service provider, ECM. The Office of Academic Affairs is designated as the contact point for students who wish to withdraw. Inter-Office email may be used to communicate that information to faculty, the bursar's office and the office of financial aid. The Office of Academic Affairs determines the withdrawal date and reports it to other institutional offices. The Office of Financial Aid calculates the return of Title IV funds using federal formulas, notifies ECM in writing to complete a recovery of Title IV aid (if applicable) to specific program funds, notifies the student of their obligation to repay funds if applicable, tracks the repayment, and refers overpayments to ED. It also offers the student any earned post-withdrawal disbursement and follows procedures and policies pertaining to this indicated in the award notification part of the manual. A student who has completed at least one class within the payment period but drops other classes is treated as having changed enrollment status rather than as having withdrawn as per section 668.22(a)(1) of HEA 1965. The award package must be revised based on the revised enrollment status and the student must be notified about the changed award amounts and status. 2018-19 *FSA Handbook* provides details on R2T4 calculations and regulations.

The date of ALLEN SCHOOL OF HEALTH SCIENCES' determination that a student withdrew is identified through their last date of attendance, faculty input, a student's failure to return from an approved leave of absence, the student's verbal or written notification to any office such as Office of Academic Affairs, Office of Financial Aid etc.

In the event of any unofficial withdrawals, R2T4 calculations must be done within 45 days (30 days for Arizona) from the date of determination of such withdrawal. The date of determination must occur within two weeks from the last day of attendance.

All enrolled students are notified about the withdrawal process and the student's rights and responsibilities including how a student reports the intent to withdraw and how the student begins the withdrawal process.

When a student applies for financial aid, a statement is signed that the funds will be used for educational purposes only. Therefore, if a student withdraws before completing the program, a portion of the funds received may have to be returned. The School will calculate the amount of tuition to be returned to the Title IV, HEA Federal fund programs according to the policies listed below.

RETURN TO TITLE IV FUNDS POLICY

This policy applies to students' who **withdraw official, unofficially or fail to return from a leave of absence or are dismissed from enrollment** at the School. It is separate and distinct from the School refund policy. (Refer to institutional refund policy)

The calculated amount of the Return of Title IV, HEA (R2T4) funds that are required to be returned for the students affected by this policy, are determined according to the following definitions and procedures as prescribed by regulations.

The amount of Title IV, HEA aid earned is based on the amount of time a student spent in academic attendance, and the total aid received; it has no relationship to student's incurred institutional charges. Because these requirements deal only with Title IV, HEA funds, the order of return of **unearned** funds do not include funds from sources other than the Title IV, HEA programs.



Title IV, HEA funds are awarded to the student under the assumption that he/she will attend school for the entire period for which the aid is awarded. When student withdraws, he/she may no longer be eligible for the full amount of Title IV, HEA funds that were originally scheduled to be received. Therefore, the amount of Federal funds earned must be determined. If the amount disbursed is greater than the amount earned, unearned funds must be returned.

The Payment Period for Clock Hour programs OR non-term Credit Hour programs is one-half of the academic year or program length (whichever is less).

The Date of Determination is the date that the institution determines is the withdrawal date. For schools that are required to take attendance, the date of determination is no longer than 14 days after the Last Date of Attendance. The Date of Determination starts the clock for timely refunds of Title IV funds, within 45 days after the "Date of Determination".

The Withdrawal Date for schools required to take attendance is the Last Date of Attendance (LDA).

The institution has 45 days (30 AZ) from the date that the institution determines that the student withdrew to return all unearned funds for which it is responsible. The school is required to notify the student if they owe a repayment via written notice.

The school must advise the student or parent that they have 14 calendar days from the date that the school sent the notification to accept a post withdraw disbursement. If a response is not received from the student or parent within the allowed time frame or the student declines the funds, the school will return any earned funds that the school is holding to the Title IV, HEA programs.

Post-withdraw disbursements will occur within 30 days of the date that the student withdrew.

WITHDRAWAL POLICY

"Official" Voluntary Withdrawal

A student is considered to be "Officially" withdrawn on the date the student notifies the Financial Aid Director or School Director in writing of their intent to withdraw. The date of the termination for return and refund purposes will be the earliest of the following for official withdrawals:

1. Date student provided official notification of intent to withdraw, in writing.
2. The date the student began the withdrawal from the School's records.

A student will be permitted to rescind his notification in writing and continue the program, if so chosen. However, if the student subsequently drops, the student's withdrawal date is the original date of notification of intent to withdraw.

Upon receipt of the withdrawal information the School will complete the following:

1. Determine the student's last date of attendance as of the last recorded date of academic attendance on the school's attendance record, and
2. Perform two calculations
 - a. The student's ledger card and attendance record are reviewed to determine the calculation of Return of Title IV, HEA funds the student has earned, and if any, the amount of Title IV, HEA funds for which the school is responsible. Returns made to the Federal Funds Account are calculated using the Department's Return of Title IV, HEA Funds Worksheets, scheduled attendance and are based upon the payment period.



- b. Calculate the school's refund requirement (see school refund calculation).
3. The student's grade record will be updated to reflect his/her final grade.
4. The School will return the amount for any unearned portion of the Title IV, HEA funds for which the school is responsible within 45 days (30 days for Arizona) of the date the official notice was provided.
5. If applicable, the School will provide the student with a letter explaining the Title IV, HEA requirements. To include,
 - a. The amount of Title IV, HEA assistance the student has earned. This amount is based upon the length of time the student was enrolled in the program based on scheduled attendance and the amount of funds the student received.
 - b. Any returns that will be made to the Federal program on the student's behalf as a result of exiting the program. If a student's scheduled attendance is more than 60% of the payment period, he/she is considered to have earned 100% of the Federal funds received for the payment period. In this case, no funds need to be returned to the Federal funds.
 - c. Advise the student of the amount of unearned Federal funds and tuition and fees that the student must return, if applicable.
6. Supply the student with ledger card record noting outstanding balance due to the school and the available methods of payment. A copy of the completed worksheet, check, letter and final ledger card will be kept in the student's file.

In the event a student decides to rescind his or her official notification to withdraw, the student must provide a signed and dated written statement indicating he/she is continuing his or her program of study, and intends to complete the payment period. Title IV, HEA assistance will continue as originally planned. If the student subsequently fails to attend or ceases attendance without completing the payment period, the student's withdrawal date is the original date of notification of intent to withdraw.

Unofficial Withdrawal

Any student that does not provide official notification of his or her intent to withdraw and is absent for more than 14 consecutive calendar days, fails to maintain satisfactory academic progress, fails to comply with the school's attendance and /or conduct policy, does not meet financial obligations to the school, or violates conditions mentioned in the School contractual agreement, will be subject to termination and considered to have unofficially withdrawn.

Within two weeks of the student's last date of academic attendance, the following procedures will take place.

1. The education office will make three attempts to notify the student regarding his/her enrollment status.
2. Determine and record the student's last date of attendance as the last recorded date of academic attendance on the attendance record.
3. The student's withdrawal date is determined as the date the day after 14 consecutive calendar days of absence.
4. Notify the student in writing of their failure to contact the school and attendance status resulting in the current termination of enrollment.
5. The School calculates the amount of Federal funds the student has earned, and, if any, the amount of Federal funds for which the school is responsible.
6. Calculate the school's refund requirement (see school refund calculation).
7. The School's Controller will return to the Federal fund programs any unearned portion of Title IV funds for which the school is responsible within 45 days of the date the withdrawal determination was made, and record on student's ledger card.



8. If applicable, the School will provide the student with a refund letter explaining Title IV requirements:
 - a. The amount of Title IV aid the student has earned based upon the length of time the student was enrolled and scheduled to attend in the program and the amount of aid the student received.
 - b. Advise the student in writing of the amount of unearned Title IV, HEA aid and tuition and fees that he/she must return, if applicable.
9. Supply the student with final student ledger card showing outstanding balance due the school and available methods of repayment.
10. A copy of the completed worksheet, check, letter, and final ledger card will be kept in the student's file.

Withdraw Before 60%

The institution must perform a R2T4 to determine the amount of earned aid through the 60% point in each payment period. The institution will use the Department of Education calculation to prorate schedule and determine the amount of the R2T4 funds the student has earned at the time of withdrawal.

Withdraw After 60%

After the 60% point in the payment period, a student has earned 100% of the Title IV, HEA funds he or she was scheduled to receive during this period. The institution must still perform a R2T4 to determine the amount of aid that the student has earned.

The School measures progress in clock hours or credit hours and uses the payment period for the period of calculation.

The Calculation Formula:

Determine the amount of Title IV, HEA Aid that was disbursed Plus Title IV, HEA aid that could have been disbursed.

Calculate the percentage of Title IV, HEA aid earned for clock hour programs:

- a) **Determine the percentage of the period completed:**

Divide the clock hours scheduled to have been completed as of the withdrawal date in the payment period by the total clock hours in the payment period.

$$\frac{\text{HOURS SCHEDULED TO COMPLETE}}{\text{TOTAL HOURS IN THE PAYMENT PERIOD}} = \% \text{ EARNED}$$

(rounded to one significant digit to the right of the decimal point, ex. .4493 = 44.9%.)

Calculate the percentage of Title IV, HEA aid earned for a credit hour programs:

- b) **Determine the percentage of the period completed:**



Divide the calendar days completed in the period by the total calendar days in the period (excluding scheduled breaks of five days or more **AND** days that the student was on an approved leave of absence).

COMPLETED DAYS

TOTAL DAYS IN THE PAYMENT PERIOD

= % EARNED

(rounded to one significant digit to the right of the decimal point, ex. .4493 = 44.9%.)

The following guidance applies to calculations for clock hour and credit hour programs:

- c) If this percentage is greater than 60%, the student earns 100%.
- d) If this percent is less than or equal to 60%, proceeds with calculation.

Percentage earned from (multiplied by) Total aid disbursed, or could have been disbursed = AMOUNT STUDENT EARNED.

Subtract the Title IV aid earned from the total disbursed = AMOUNT TO BE RETURNED.

100% minus percent earned = UNEARNED PERCENT

Unearned percent (multiplied by) total institutional charges for the period = AMOUNT DUE FROM THE SCHOOL.

If the percent of Title IV aid disbursed is greater than the percent unearned (multiplied by) institutional charges for the period, the amount disbursed will be used in place of the percent unearned.

If the percent unearned (multiplied by) institutional charges for the period are less than the amount due from the school, the student must return or repay one-half of the remaining unearned Federal Pell Grant.

Student is not required to return the overpayment if this amount is equal to or less than 50% of the total grant assistance that was disbursed /or could have been disbursed. The student is also not required to return an overpayment if the amount is \$50 or less.

The School will issue a grant overpayment notice to student within 30 days from the date the school's determination that student withdrew, giving student 45 days to either:

1. Repay the overpayment in full to NAME OF SCHOOL
OR
2. Sign a repayment agreement with the U.S. Department of Education.



Order of Return

The School is authorized to return any excess funds after applying them to current outstanding Cost of Attendance (COA) charges. A copy of the Institutional R2T4 work sheet performed on your behalf is available through the office upon student request.

In accordance with Federal regulations, when Title IV, HEA financial aid is involved, the calculated amount of the R2T4 Funds is allocated in the following order:

- Unsubsidized Direct Stafford loans (other than PLUS loans)
- Subsidized Direct Stafford loans
- Direct PLUS loans
- Federal Pell Grants for which a Return is required
- Federal Supplemental Educational Opportunity Grant
- Iraq and Afghanistan Service Grant for which a Return is required
- Other Title IV assistance
- State Tuition Assistance Grants (if applicable)
- Private and institutional aid
- The Student

Earned

Title IV, HEA aid is earned in a prorated manner on a per diem basis (clock hours or credit hours) up to the 60% point in the semester. Title IV, HEA aid is viewed as 100% earned after that point in time. A copy of the worksheet used for this calculation can be requested from the financial aid director.

Post Withdraw

If you did not receive all of the funds that you have earned, you may be due a post-withdrawal disbursement. The School may use a portion or all of your post- withdraw disbursement for tuition and fees (as contracted with the School). For all other school charges, the School needs your permission to use the post-withdraw disbursement. If you do not give permission, you will be offered the funds. However, it may be in your best interest to allow the school to keep the funds to reduce your debt at the school.

The post-withdrawal disbursement must be applied to outstanding institutional charges before being paid directly to the student.

Institution Responsibilities

The School's responsibilities in regards to Title IV, HEA funds follow:

- Providing students information with information in this policy;
- Identifying students who are affected by this policy and completing the return of Title IV funds calculation for those students;
- Returning any Title IV, HEA funds due to the correct Title IV programs.

The institution is not always required to return all of the excess funds; there are situations once the R2T4 calculations have been completed in which the student must return the unearned aid.



Overpayment of Title IV, HEA Funds

Any amount of unearned grant funds that a student must return is called an overpayment. The amount of grant overpayment that you must repay is half of the grant funds you received. You must make arrangements with the School or Department of Education to return the amount of unearned grant funds.

Student Responsibilities in regards to return of Title IV, HEA funds

- Returning to the Title IV, HEA programs any funds that were dispersed to the student in which the student was determined to be ineligible for via the R2T4 calculation.
- Any notification of withdraw should be in writing and addressed to the appropriate institutional official.
- A student may rescind his or her notification of intent to withdraw. Submissions of intent to rescind a withdraw notice must be filed in writing.
- Either these notifications, to withdraw or rescind to withdraw must be made to the official records/registration personal at your school.

Refund vs. Return to Title IV

The requirements for the Title IV, HEA program funds when you withdraw are separate from any refund policy that The School may have to return to you due to a cash credit balance. Therefore, you may still owe funds to the school to cover unpaid institutional charges. The School may also charge you for any Title IV, HEA program funds that they were required to return on your behalf.

If you do not already know what the School refund policy is, you may ask your Schools Financial Planner for a copy.

Return to Title IV questions?

If you have questions regarding Title IV, HEA program funds after visiting with your financial aid director, you may call the Federal Student Aid Information Center at 1-800-4-fedaid (800-433-3243). TTY users may call 800-730-8913. Information is also available on student aid on the web www.studentaid.ed.gov.

Summary Treatment of Title IV Aid When a Student Withdraws

The law specifies how your school must determine the amount of Title IV program assistance that you earn if you withdraw from school. The Title IV programs that are covered by this law are Federal Pell Grants, Iraq and Afghanistan Service Grants, TEACH Grants, Direct Loans, Direct PLUS Loans, Federal Supplemental Educational Opportunity Grants (FSEOGs), and Federal Perkins Loans.

Though your aid is posted to your account at the start of each period, you earn the funds as you complete the period. If you withdraw during your payment period or period of enrollment (your school can define these for you and tell you which one applies to you), the amount of Title IV program assistance that you have earned up to that point is determined by a specific formula. If you received (or your school or parent received on your behalf) less assistance than the amount that you earned, you may be able to receive those additional funds. If you received more assistance than you earned, the excess funds must be returned by the school and/or you.

The amount of assistance that you have earned is determined on a pro rata basis. For example, if you completed 30% of your payment period or period of enrollment, you earn 30% of the assistance you were originally scheduled to receive. Once you have completed more than 60% of the payment period or period of enrollment, you earn all the assistance that you were scheduled to receive for that period.

If you did not receive all of the funds that you earned, you may be due a post-withdrawal disbursement. If your post-withdrawal disbursement includes loan funds, your school must get your permission before it can disburse them. You may choose to decline some or all of the loan funds so that you don't incur additional debt. Your school may



automatically use all or a portion of your post-withdrawal disbursement of grant funds for tuition, fees, and room and board charges (as contracted with the school). The school needs your permission to use the post-withdrawal grant disbursement for all other school charges. If you do not give your permission (some schools ask for this when you enroll), you will be offered the funds. However, it may be in your best interest to allow the school to keep the funds to reduce your debt at the school. There are some Title IV funds that you were scheduled to receive that cannot be disbursed to you once you withdraw because of other eligibility requirements. For example, if you are a first-time, first-year undergraduate student and you have not completed the first 30 days of your program before you withdraw, you will not receive any Direct Loan funds that you would have received had you remained enrolled past the 30th day. If you receive (or your school or parent receives on your behalf) excess Title IV program funds that must be returned, your school must return a portion of the excess equal to the lesser of:

1. your institutional charges multiplied by the unearned percentage of your funds, or
2. the entire amount of excess funds.

The school must return this amount even if it didn't keep this amount of your Title IV program funds.

Withdrawal Date

For campus-based programs, the faculty is required to take attendance and notify the Office of Academic Affairs if a student has stopped attending class without any notice for 3 (three) consecutive scheduled class days. The Academic Dean monitors attendance of all enrolled students. It will contact the student via email, phone call or by letter. If no response is received within the following week, the school will assume the student has unofficially withdrawn. The Dean will determine the withdrawal date which would be no later than two weeks from the last day of attendance. For online students, the withdrawal date will be the actual last date that the student successfully completed a weekly assignment for a course. However, if the student responds, the official withdrawal date will be the date on which the student notifies the school via any means of communication. A student who wishes to withdraw from school for compelling personal reasons should notify the Dean in writing stating the reasons for withdrawal and whether or not the student intends to return at a later date to pursue their program of study. All documentation for a withdrawn student will be kept in the student's file.

ALLEN SCHOOL OF HEALTH SCIENCES may grant a Leave of Absence (LOA). Students who require a leave of absence from their program must do so in writing and be approved by the School Director prior to leaving the program. If a student does not return from their LOA, the Office of Academic Affairs will notify the Office of Financial Aid. The school will assume the student has unofficially withdrawn on the following day of the date of return from their LOA. This begins the withdrawal process. The office of Financial Aid will complete the R2T4 (Return to Title IV) process as per regulations as described in the manual.

Formula Calculation

ALLEN SCHOOL OF HEALTH SCIENCES Financial Aid Office is required by federal statute to recalculate federal financial aid eligibility for students who withdraw, drop out, are dismissed, or who fail to return from an approved leave of absence prior to completing 60% of a payment period. The federal Title IV financial aid programs must be recalculated in these situations.

If a student leaves the institution prior to completing 60% of a payment period, the financial aid office recalculates eligibility for Title IV funds. Recalculation is based on the percentage of earned aid using the following Federal Return of Title IV funds formula:

Percentage of payment period = the number of clock hours scheduled to be completed up to the withdrawal date divided by the number of clock hours scheduled to be completed in the payment period. This percentage is also the percentage of earned aid. Funds are returned to the appropriate federal program based on the percentage of unearned aid using the following formula:



Aid to be returned = (100% of the aid that could be disbursed minus the percentage of earned aid) multiplied by the total amount of aid that could have been disbursed during the payment period.

If a student earned less aid than was disbursed, the institution would be required to return a portion of the funds and the student could be required to return a portion of the funds. When Title IV funds are returned as required by Federal Regulation, the student may owe a debit balance to the institution.

If a student earned more aid than was disbursed to them, the institution would owe the student a post-withdrawal disbursement which must be paid within 120 days of the student's withdrawal. The institution must return the amount of Title IV funds for which it is responsible no later than 45 days (30 days for Arizona) after the date of the determination of the date of the student's withdrawal.

Refunds are allocated in the following order:

- Unsubsidized Federal Stafford Loans
- Subsidized Federal Stafford Loans
- Unsubsidized Direct Stafford Loans (other than PLUS loans)
- Subsidized Direct Stafford Loans
- Federal Parent (PLUS) Loans
- Direct PLUS Loans
- Federal Pell Grants for which a Return of funds is required
- Federal Supplemental Opportunity Grants for which a Return of funds is required

Federal Work Study funds are never subject to R2T4 calculations because they represent payroll earned by the student for work performed.

The following is a step-by-step process that is followed in all R2T4 calculations

- Step 1:** Determine the percentage of aid earned by calculating the percentage of the scheduled payment period.
- Step 2:** Determine the amount of earned aid by applying the percentage to the total Title IV aid that was or could have been disbursed.
- Step 3:** Determine the amount of unearned aid by subtracting earned aid from disbursed aid *or* determine the amount of a post-withdrawal disbursement by subtracting disbursed aid from earned aid.
- Step 4:** If unearned funds must be returned, determine the schools and the student's shares; *or* if a post-withdrawal disbursement is due, determine the sources from which it will be funded.
- Step 5:** If unearned funds must be returned, allocate unearned aid to programs from which student was funded; *or* if a post-withdrawal disbursement is due, send student applicable notification.
- Step 6:** Return the institution's share and any funds repaid by the student or refer the student to ED; *or* make the post-withdrawal disbursement.

The Department of Education provides return of Title IV funds worksheets in Volume 2, Chapter 6 of the FSA Handbook. It has also developed software that automates the calculation. This software can be downloaded via www.sfadownload.ed.gov/ReturnT4Funds.htm. These are used to calculate all R2T4 calculations. A copy of the worksheet in the event of manual calculation and a computer printout in the event of automated calculation is placed



in the student's file. The office of financial aid performs all R2T4 calculations as it has all Title IV award and institutional charges information which are required in the calculations.

Post-Withdrawal Disbursements

In the event a student is eligible for a post-withdrawal disbursement based on the student's budget, awarded financial aid and Title IV funds and R2T4 calculations, a post-withdrawal disbursement must be made only after the following conditions are met.

- The Student is notified of the availability of post-withdrawal disbursements by the Office of Financial Aid within one week from the date of R2T4 calculation was performed.
- The student notifies the Office of Financial Aid within a reasonable time indicating their acceptance of available post-withdrawal disbursement amounts. The reasonable time refers to allowing sufficient time for the school to process a post-withdrawal disbursement within the deadlines set by the Department of Education.
- The student has outstanding institutional charges that are due and wants to pay off those charges by applying their post-withdrawal disbursement.
- The student completed all necessary paperwork related to the post-withdrawal disbursement within a reasonable time.

The Office of Financial Aid must track the notification and authorization to make the disbursement and meet deadlines as prescribed by ED. A school must process Title IV aid within 120 days from the last day of the payment period.

The post-withdrawal disbursement must be applied to outstanding institutional charges before being paid directly to student. See sections 668.22(a)(4) of HEA 1965 and GEN-04-03 for details on Post-Withdrawal Disbursement regulations.

School Refund Components and Policy

ALLEN SCHOOL OF HEALTH SCIENCES institutional refund policy in accordance with the accrediting agency and state education department policies is expressed as a schedule of revised institutional charges incurred by students who withdraw, based on the length of time they remain enrolled or the consumption of services. The refund policy is entirely the purview of Bursar's office. Bursar's Office is responsible for developing, updating, and distributing the policy to all offices and students. ALLEN SCHOOL OF HEALTH SCIENCES includes the institutional refund policy as a part in the 'Enrollment Agreement' form which applies to all ALLEN SCHOOL OF HEALTH SCIENCES students.

CANCELLATION AND REFUND POLICY for those programs measured in clock hours.

TERM REFUND POLICY



The following refund policies will be superseded if the Federal Pro-Rata refund policy results in a refund that is more beneficial to the student. The date of withdrawal for refund purposes is the last date of attendance. Fees and charges paid to the school for goods and services which have not been provided by the school and accepted by the student shall be refunded. Any moneys paid to the school in excess of the sum due the school by the student who cancels, withdraws, or is discontinued will be refunded within forty-five (45) days of such action. The failure of a student to notify the director in writing of withdrawal may delay refund of tuition due pursuant to Section 5001 and 5002 of the Education Law.

1. A student may cancel this agreement at no penalty provided the student has not entered into instruction.
2. If the student withdraws or is discontinued after instruction has begun, the school may retain not more than: tuition liability as of the student's last date of physical attendance.

Tuition liability is divided by the number of terms in the program. Total tuition liability is limited to the term during which the student withdrew or was terminated, and any previous terms completed.

During the First Term

- a) 0% of the term's tuition if the termination is during the first week of instruction; or
- b) 20% of the term's tuition if the termination is during the second week of instruction; or
- c) 35% of the term's tuition if the termination is during the third week of instruction; or
- d) 50% of the term's tuition if the termination is during the fourth week of instruction; or
- e) 70% of the term's tuition if the termination is during the fifth week of instruction; or
- f) 100% of the term's tuition if the termination occurs thereafter.

During the subsequent terms

- a) 20% of the term's tuition if the termination is during the first week of instruction; or
- b) 35% of the term's tuition if the termination is during the second week of instruction; or
- c) 50% of the term's tuition if the termination is during the third week of instruction; or
- d) 70% of the term's tuition if the termination is during the fourth week of instruction; or
- e) 100% of the term's tuition if the termination occurs thereafter.

QUARTERS REFUND POLICY

Tuition liability is divided by the number of quarters in the program. Total tuition liability is limited to the quarter during which the student withdrew or was terminated, and any previous quarters completed.

During the First Quarter

- a) 0% of the quarter's tuition if the termination is during the first week of instruction; or
- b) 25% of the quarter's tuition if the termination is during the second week of instruction;
- c) 50% of the quarter's tuition if the termination is during the third week of instruction; or
- d) 75% of the quarter's tuition if the termination is during the fourth week of instruction; or
- e) 100% of the quarter's tuition if the termination occurs thereafter.

The student refund policy for the second quarter shall be the same as the first quarter unless the school demonstrates at the time of the student's termination that there were no significant education changes in the student's educational program.

During the subsequent quarters

- a) 25% of the quarter's tuition if the termination is during the first week of instruction; or
- b) 50% of the quarter's tuition if the termination is during the second week of instruction;
- c) 75% of the quarter's tuition if the termination is during the third week of instruction; or
- d) 100% of the quarter's tuition if the termination occurs thereafter.

MINI PROGRAM REFUND POLICY



Termination Occurs School may keep	
0-15% of the program	0%
16 – 30% of the program	25%
31 – 45% of the program	50%
46 – 60% of the program	75%
After 60% of the program	100%

For those programs measured in credit hours

The refund policy for students who incur a financial obligation for a period of 12 months or less shall be as follows:

Three-Day Cancellation: An applicant who provides written notice of cancellation within three days (excluding Saturday, Sunday and federal and state holidays) of signing an enrollment agreement is entitled to a refund of all monies paid. No later than 30 days of receiving the notice of cancellation, the school shall provide the 100% refund.

- (i) During the first 10% of the period of financial obligation, the institution shall refund at least 90% of the tuition;

- (ii) After the first 10% of the period of financial obligation and until the end of the first 25% of the period of obligation, the institution shall refund at least 50% of the tuition;
- (iii) After the first 25% of the period of financial obligation and until the end of the first 50% of the period of obligation, the institution shall refund at least 25% of the tuition; and,
- (iv) After the first 50% of the period of financial obligation, the institution may retain all of the tuition.

Institutional Refund Repayment Appeals

ALLEN SCHOOL OF HEALTH SCIENCES does not have any provisions for students to appeal the amount of an institutional refund, the amount of outstanding charges, or the repayment process. However, the student may contact Bursar’s Office and speak to a representative to further discuss their outstanding charges if he/she wishes to do so.

H: APPENDICES

Forms

Provide copies of all forms the school uses for the administration of all Title IV programs. Such forms might include, but are not limited to:

- a. Appeal forms for professional judgment and dependency status change
- b. Application forms (FAFSAs and other loan application forms)
- c. Award notifications
- d. Revised award notifications
- e. FERPA authorization consent (student release) forms
- f. Satisfactory academic progress correspondence
- g. Verification forms
- h. Affidavit for untaxed income documentation (e.g., W-2 forms, Social Security Administration forms, child support documentation, etc.)
- i. Authorization or Waiver forms for cash management requirements and refunds
- j. Return of Title IV funds calculation worksheets
- k. Return of Title IV funds correspondence to students/parents
- l. Withdrawal forms
- m. Leave of Absence Request Form
- n. Eligible non-citizen secondary confirmation form (i.e., G-845)