

LAC COURTE OREILLES OJIBWE UNIVERSITY

FINANCIAL AID HANDBOOK AWARD YEAR 2023-2024



Lac Courte Oreilles Ojibwe University
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Honor Your Past, Strengthen Your Future

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LAC COURTE OREILLES OJIBWE UNIVERSITY

INSTITUTIONAL OVERVIEW

OPE ID: 02532200

FEDERAL SCHOOL CODE: 017199

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

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

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

MISSION STATEMENT

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

ACCREDITATION

The North Central Association of Colleges and Schools Commission on Institutions of Higher Education awarded candidacy for accreditation to LCOOU. North Central Association, Commission on Institutions of Higher Education, 30 LaSalle Street, Suite 2400, Chicago, IL 60602, phone (800) 621-7440 / (312) 263-7462.

MEMBERSHIPS

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

LAND GRANT STATUS

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

Congress has since extended land grant program funds to colleges in Guam, the Virgin Islands, and other trust territories as well as to Hispanic colleges in the United States. Twenty-nine U.S. Tribal colleges, including LCOOU, were named Land-Grant Institutions in September 1994.

The bill granting Land Grant status to the nation's Tribal Colleges authorized Congress to appropriate \$4.6 million annually from 1996 through 2000 to establish an endowment fund that will be used for their support. It also authorized funds for extension services and competitive grants from the U.S. Department of Agriculture. Because of their Land

Grant designation, the Tribal College programs of outreach and technical assistance to rural populations, for which the original Land-Grant Institutions were founded, will be strengthened.

THE CAMPUS

The LCOOU campus is located near Hayward Wisconsin. It is within the boundaries of the Lac Courte Oreilles Ojibwe reservation and serves three outreach sites on the Bad River, Red Cliff, and Lac du Flambeau reservations.

STATEMENT OF PURPOSE FOR STUDENT FINANCIAL AID

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

USE AND SCOPE OF THIS POLICY & PROCEDURES MANUAL

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

LAC COURTE OREILLES OJIBWE UNIVERSITY PROGRAM ELIGIBILITY

LCOOU has been a participant in the Federal Title IV financial programs since 1988. The current program certification documents are on file in the financial aid office.

Fall Semester 2023

Registration ends — August 18

Classes begin — August 28

Labor Day (No Classes) — September 4

Last day to add classes w/faculty approval — September 5

1A-Last day to add/drop classes — September 5

Last day to drop classes — September 11

Census Date — September 12

Constitution Day — September 17

1A-Midterm grades due — September 25

Indigenous Peoples Day (No Classes) — October 9

1A-Last day to withdraw — October 9

1B-Last day to register — October 14

1A-Last day of classes — October 21

Grades due (Midterms/1A Final) — October 23

1B-Classes begin — October 23

Registration for Spring begins — October 30

1B-Last day to add/drop classes — October 30

1B-Census Date — October 31st

Veterans Day Observance (No Classes) — November 10

Last day to withdraw — November 20

1B-Midterm grades due — November 20

Employee Appreciation Day (No Classes) — November 22

Thanksgiving (No Classes) — November 23-25

Final exams — December 11-16

Last day of classes — December 16

1B-Last day of classes — December 16

Final grades due — December 18

New Student Application Closes (Spring start) - December 21

Spring Semester 2024

Registration ends — January 5

Classes begin — January 15

Treaty Day (No Classes) — January 19

Last day to add classes w/faculty approval — January 22

Last day to drop classes — January 29

Census Date — January 30

2A-Midterm grades due — February 12

2A-Last day to withdraw — February 26

2A-Last day of classes — March 9

Grades due (Midterms / 2A-Final) — March 11

Registration Fall/Summer begins - March 11

Spring Break (No Classes) — March 11-16

Classes resume — March 18

2B-Classes begin — March 18

Easter Break (No Classes) — March 29-April 1

Classes resume — April 2

Last day to withdraw — April 15

2B-Midterm grades due — April 15

Final exams — May 6-11

Last day of classes — May 11

Final grades due — May 13

Commencement — May 18

Summer Semester 2024

Registration ends — May 31

Classes begin — June 3

Last day to add/drop — June 10

Census Date — June 11th

Midterm grades due — July 1

July 4th Holiday (no classes)

Last day to withdraw — July 15

Last day of classes — July 27

Final grades due — July 29

SAMPLE FORMS & MATERIALS USED BY LCOOU

Forms and materials can be found online at www.lco.edu.

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

ADMINISTRATIVE CAPABILITIES

SECTION 1

PART 1.1 ADEQUATE PERSONNEL TO ADMINISTER TITLE IV PROGRAMS

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

1.1.1 STAFFING

REGISTRATION

Registrar

General Summary: Responsible for initiating and maintaining the permanent academic record of each student and for the registration of all students. Works closely with Academic staff and maintains accurate records of all college courses

and curriculum requirements. Coordinates with institutional research and IT staff in compiling statistical data required by governmental agencies.

FINANCIAL AID

Financial Aid Director

General Summary: Responsible for administering all financial aid awarded by applicable rules and regulations.

Financial Aid Assistant

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

BUSINESS OFFICE

Chief Financial Officer

General Summary: Responsible for financial reporting, internal controls, and direction of all business office staff. Manages various grant key holder responsibilities for drawing federal funding through the G5 Fund Facility.

Staff Accountant – Accounts Payable

General Summary: Responsible for issuing checks to students with credit balances.

Staff Accountant – Payroll and Bank Reconciliation

General Summary: Responsible for posting student transactions in Ellucian- Colleague. Reconciliation of G5 transactions with the Financial Aid Office and Business Office.

Accounts Receivable Accountant

General Summary: Responsible for student accounts including tuition/ fees billing, financial aid distribution refunds, student accounts receivables recording, and monitoring of student account balances. This position is also responsible for the collection of delinquent accounts, establishing student payment plans, and all third-party billing.

PROGRAM PARTICIPATION

Federal Pell Grant

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

Federal Work-Study

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

Federal Supplemental Education Opportunity Program (FSEOG)

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

Tribal Higher Education Grant; BIA Grant

The Tribal Higher Education Grant is available to Native American students. Students must contact their respective Tribe’s Higher Education Office to obtain their application and eligibility requirements. Most funds are awarded on a

first-come-first-served basis. Funds administration is managed by Department of Education mandates. Ongoing communication with tribal Higher Education Liaisons is maintained.

Employment Assistance Adult Vocational Training

A student who is a member of a federally recognized Indian tribe or band may apply for grants-in-aid administered by the Employment Assistance Program within the Bureau of Indian Affairs (BIA). Each student must apply early each year through the Tribe, where he or she is enrolled, or a BIA agency office where he/she is enrolled.

Veterans Benefits

Veterans of active military service should contact their local Veterans Administration Service Office for more information concerning the application process.

Department of Defense

Ban Against Inducements, Commission, and High-Pressure Recruitment- Tactics for Service Members

- LCOOU intends to abide by the DoD guidelines banning certain inducements, commissions, and high-pressure recruitment tactics intended to secure the enrollment of current military service members. The University must not provide any inducements to any individual or entity to secure the enrollment of current military service members or obtain military-provided tuition assistance. Inducements include any gratuity, favor, discount, entertainment, hospitality, loan, transportation, lodging, meals, or other item having a monetary value of more than a de minimis amount. The University must also refrain from providing any commission, bonus, or other incentive payment based directly or indirectly on securing enrollments or federal financial aid (including Tuition Assistance Funds) to any persons or entities engaged in any student recruiting, admissions activities, or making decisions regarding the award of student financial assistance. The University must prohibit the use of high-pressure recruitment tactics such as making multiple unsolicited contacts (3 or more total), including contacts by phone, e-mail, or in-person, and engaging in same-day recruitment and registration to secure military service member enrollment. Any violation of these guidelines or procedures by university staff or faculty could lead to disciplinary action.

Readmission of Service Members

- Per the Department of Defense (DoD), the Lac Courte Oreilles Ojibwe University will promptly readmit service members with the same academic status they had when they last attended the institution or were accepted for admission before deployment. The readmission applies to any student unable to attend school due to military service. The Financial Aid Office and Registrar are the designated offices at the university that a student will contact to provide both notification of service and notification of intent to return.
 - Eligibility:
 - i. The institution is given notice of the service member's absence from service.
 - ii. The cumulative length of the absence and all previous absences from the institution for military service may not exceed five years. Only the time the student spends performing service is counted.
 - iii. The service member gives notice of his/her intent to return within the applicable time limit.
- The service member or an appropriate officer of the Armed Forces must provide a notice of absence for service to the Financial Aid or Registrar offices. This notice may be oral or written.
- Service members returning from active duty must submit a notice of intent to re-enroll to the Registrar and Financial Aid Office before registering for classes. For readmission to the university, the service member must apply for readmission. Upon readmission, returning students are allowed to continue in the same academic program under the guidelines of the university's readmission procedure in the student handbook. The university will make every reasonable effort to assist students in resuming the service member program. If the exact program is no longer available, the student will be admitted into a similar program unless the student chooses a different program. Service members who receive dishonorable or bad conduct discharger may remain eligible for readmission under the general readmission policy in the student handbook.

Service Members Receiving Approval from an Educational Services Officer (ESO) or Counselor within the Military Service Before Enrolling at LCOOU

- Per the Department of Defense (DoD), LCOOU will direct all eligible service members to speak with their Educational Service Officer (ESO) or counselor within the Military Service before applying and being enrolled at LCOOU. This is to ensure that service members understand their eligibility for TA and their potential financial responsibility toward Lac Courte Oreilles Ojibwe University.

Vocational Rehabilitation

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

American Indian College Fund (AICF)

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

Scholarships

LCOOU Financial Aid Office has information about other higher education funding sources. Scholarship notices received by the Financial Aid Office are sent to students' university email, posted on the bulletin board in the 200 wing, and <https://www.lco.edu/scholarships> website. Students are encouraged to find additional scholarship opportunities on their own as well.

Minority Grant

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

Talent Incentive Grant

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

Wisconsin Divisions of Vocational Rehabilitation (DVR)

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

Wisconsin Grant (WG)

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

Wisconsin Indian Grant (WIG)

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

Ineligibility for state funding

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

Financial Need Analysis

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

NUMBER OF FINANCIAL AID APPLICATIONS EVALUATED

Award Year 2022-2023 = 673 applications

NUMBER OF STUDENTS WHO RECEIVE TITLE IV FUNDS AND AMOUNT

Award Year 2022-2023 = 206 students (total funded by Pell, FWS, and FSEOG = \$553,141)

TYPE OF FINANCIAL AID DELIVERY SYSTEM

Ellucian- Colleague is a software program that is used solely by the financial aid office to manage all aspects of financial aid. Ellucian- Colleague which is a comprehensive, fully-scalable administrative platform designed specifically for use in Higher Education. Members of an institution's ecosystem are connected with a centralized database that can be implemented out-of-the-box and rapidly deployed. Ellucian- Colleague provides interoperable workflows that adapt as institution policies change and technology evolves.

OFFICE AUTOMATION USED IN THE ADMINISTRATING TITLE IV AID

LCOOU has a student records program called Ellucian-Colleague that manages all aspects of financial aid. The only personnel who have access to this system are the Financial Aid Director and the Financial Aid Assistant. Ellucian-Colleague interfaces with all other departments through the ERP system that was purchased in 2022.

Ellucian- Colleague is the program that is used to download student ISIR files from CPS. Students with questionable or conflicting data will be selected for verification by the Financial Aid Department.

Ellucian- Colleague is designed to handle all processes of packaging, budget construction, requesting verification documents, and file review. Ellucian- Colleague transfers SAP determinations which is determining financial aid eligibility.

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

The IT department backs up all networked resources on-premises from one server to another daily. Security measures are put in place to protect private information through the use of passwords and access rights assigned to each employee. For instance, Ellucian- Colleague, employees are only given access to those areas that are used to accomplish their job duties.

PART 1.2 ADEQUATE CHECKS AND BALANCES

Organizational Structure

FINANCIAL AID OFFICE

The Financial Aid Office reports to the Business Office within LCOOU's organizational structure. Financial Aid consists of two employees: the Financial Aid Director and the Financial Aid Assistant.

Office hours: Monday-Friday, 8:00-5:30. Lunch timeframes are typically staggered between personnel so assistance is available throughout the day; however, if needed, special accommodations may be necessary. Students may contact the FAO by email, or phone or stop by in person. The Financial Aid Office maintains an open-door policy to the maximum extent possible. Financial Aid staff visits each outreach site at least once per month.

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

BUSINESS OFFICE

The Business Office has employees; CFO and two staff members.

Office Hours: Monday – Friday, 7:00-4:30. Students may phone, email, or stop by the office to speak to personnel about questions or concerns.

Fiscal Records: Paper records must be kept for at least 7 years. The current year plus the previous year's papers are retained in the Business Office in locked cabinets. The remaining five years are stored in the lower level of the University in the archive room. Once the retention period has passed, all records will be shredded. Electronic records are kept indefinitely and are protected with passwords.

System of checks and balances

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

Family defined:

A member of an individual's family is a parent, sibling, spouse, child, spouse's parent, sibling's spouse, or child's spouse.

Audits

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

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

PART 1.3 SATISFACTORY ACADEMIC PROGRESS (SAP)

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

Standards of Progress

Federal regulations require students receiving financial assistance through Title IV federal financial aid to maintain SAP and be enrolled in classes required for their program of study. These standards measure both qualitative (grade point average) and quantitative (number of credits earned) progress and are calculated at the end of each period of enrollment (semester).

The Qualitative measurement evaluates the quality (GPA and academic standing) of the student's academic work. Quantitative measurements evaluate the pace and progress by which a student is working toward completion of their program of study. This is measured by establishing a required percentage of credit hours that must be passed when attempted and by a maximum timeframe that the student has to complete their required coursework.

Qualitative

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

Quantitative

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

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

Pace of Progression

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

Pace of Progression examples for a student enrolled full-time (12 credits or more):

- **Example 1:** Student attempts 15 credits, and successfully completes 12 credits $12/15=80\%$. The student is in good academic standing.
- **Example 2:** Student attempts 15 credits, and successfully completes 9 credits. $9/15=60\%$. The student is placed on warning status and will continue to receive aid.

Maximum Time Frame

The number of credits attempted includes classes that the student has taken at LCOOU and transfer credits (that apply to their program of study) from other colleges or universities, regardless of whether financial aid was received while enrolled in those classes.

Repeated classes, failed classes, withdrawals, and incompletes are also counted toward the number of credits attempted. The only exceptions are classes withdrawn before the Date of Record. The maximum timeframe in which you must complete an educational program is determined by multiplying the total credits in your degree by 150%.

- **Example 1:** Liberal Arts 63 credits required - Maximum credits allowed $63 \times 1.5 = 95$
- **Example 2:** GIS Certificate 31 credits required - Maximum credits allowed $31 \times 1.5 = 47$

Academic Amnesty

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

Financial Aid Warning

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

Financial Aid Suspension

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

Reinstatement of Financial Aid (Appeal)

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

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

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

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

Academic Plan (after an appeal)

For the student who may not be able to meet SAP in their next period of enrollment, the Financial Aid Committee may elect to provide an academic plan that will spell out specific goals and completion dates. As long as the student is

following the plan, they will remain eligible for funding. However, if they fail to meet the plan requirements, they will be put back on suspension and become ineligible.

Limit of Appeals

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

Reestablish Eligibility

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

Financial Aid Probation

Once the student has been reinstated and maintained SAP for one semester, they will be placed back into good financial aid status. However, if the student does not meet SAP for the semester for which they were reinstated, they will be placed back on Suspension and are ineligible for financial aid.

Repeated Courses

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

PART 1.4 CONFLICTING DATA

Part A: Resolving Conflicting Data:

The FA Department requires conflicting data to be reconciled before an applicant's receipt of financial aid. Data resolution pertains to:

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

Examples of Conflicting Data:

- A student is not selected for verification, the IRS transcript is on file, and the information conflicts with items on the FAFSA.
- IRS transcript shows the parent single head of household and the FAFSA/ISIR shows the same person as married.
- Parent or student reports on their FAFSA and signed a verification worksheet that they will not file an IRS 1040. You have reason to believe that they would have been required to file a U.S. Income Tax Return, as the amount of

reported income is greater than or equal to the minimum amount required to file as indicated in the instructions provided on 1040.

- Statement or information that suggests that the copy of the IRS transcript you received is not the return filed with the IRS.
- The school receives a Profile from CSS. The student reports a specific amount in untaxed income; FAFSA reports a different amount (If the school receives the CSS Profile, it must ensure that the information contained there does not conflict with other documents received by the school).
- Veterans (VA) benefits verified by the certifying official in the Registrar's Office don't match the FAFSA. (To resolve conflict, can rely on certifying official).
- Admissions information received impacts student eligibility (e.g., a student accepted into a non-degree program, a student received a scholarship from high school, etc.)
- The Student's Academic Progress or Enrollment Status on file in the Financial Aid Office doesn't agree with the information from the Registrar's Office.

Part B: Fraud and Abuse:

Should fraud or abuse be detected or suspected, report it to the Director of the Financial Aid Office. The Director will consult with the school's legal counsel before referring it for the investigation to the Office of the Inspector General of the Department of Education or any agency outside the school.

All credible information indicating that an applicant for Title IV may have engaged in fraud or other criminal conduct will be provided. Fraud is the intent to deceive as opposed to a mistake.

In addition, we will refer any third-party servicer who may have engaged in fraud, breach of fiduciary responsibility, or other illegal conduct involving the FSA Programs.

OIG Address and Phone Numbers

Office of Inspector General
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-1510
1-800-MIS-USED

Email: oig.hotline@ed.gov

Web: <http://www.ed.gov/about/offices/list/oig/hotline.html>

Regional Offices Telephone No. National Hotline

Boston, MA (617) 289-0174
Inspector General's Hotline

New York, NY (646) 428-3861
Philadelphia, PA (215) 656-6900
Atlanta, GA (404) 562-6460
Chicago, IL (312) 730-1620
Dallas, TX (214) 661-9530
Denver, CO (303) 844-0058
Kansas City, MO (816) 268-0530
Long Beach, CA (562) 980-4141
San Juan, PR (787) 766-6278
Washington, DC (202) 245-6911

OIG referrals

PART 1.5 FISCAL & CASH MANAGEMENT

Fiscal Reports and Financial Statements

The FAO emails report that documents all financial aid transactions to the Business Office. The Business Office will post to General Ledger after they receive confirmation of the G5 drawdown (from the Office of Business Affairs) and the bank statement showing the funds have been deposited into the bank account.

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

Retention of Required Records

Paper records are maintained for 5 years; electronic records are kept indefinitely. Listing of required records:

- Institutional Student Information Record (ISIR)
- ISIR changes
- Verification paperwork
- Award Letter
- Software reports Ellucian- Colleague, Microsoft Office)
- Return to Title IV Worksheets
- FISAP
- IPEDS
- ECAR
- PPA
- Supporting documentation to calculate completion and graduation rates.
- All records on the administration of FSEOG, FWS, and Pell programs.

General Requirements

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

Examination of Records

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

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

Disbursing Title IV Funds

Disbursement

Title IV funds are requested from COD and once disbursements are accepted; the financial aid software (Ellucian-Colleague) will transfer the funds to the student. Financial aid staff will review all student award packages at the beginning of the term and ensure disbursements occur in the correct payment periods.

Disbursement by payment period

The following criteria must be verified before a disbursement is made:

1. The student is fully admitted to the University in an eligible program.

2. Number of hours enrolled at the census date.
3. Possess one of the following: GED/HSD/HSED
4. Meeting satisfactory academic progress

Disbursement Dates

Financial aid staff will import the monthly Student Account Statement generated by COD into Ellucian- Colleague. The staff will also use any mismatched data from the SAS report and compare COD, and Ellucian- Colleague disbursement dates to ensure all disbursement dates match and are accurate. If any mismatches occur, the student's disbursement date will be manually adjusted or updated.

Fall Semester 2023:

Financial aid does not disburse any aid until October 1, 2023. Pell disbursements occur starting the 5th week of the semester (on or before October 1, 2023) if no issues exist (i.e. FAFSA/verification is complete and/or high school completion information is on file). BIA awards and private scholarships are typically disbursed toward the end of October or the beginning of November. Any subsequent funding will be disbursed bi-weekly throughout the semester for qualifying students and as administratively feasible.

Spring Semester 2024:

Financial aid does not disburse any aid until February 1, 2024. Pell disbursements occur starting the 5th week of the semester (on or before February 1, 2024) if no issues exist (i.e. FAFSA/verification is complete and/or high school completion information is on file). BIA awards and private scholarships are typically disbursed toward the end of February or the beginning of March. Any subsequent funding will be disbursed bi-weekly throughout the semester for qualifying students and as administratively feasible.

Summer Semester 2024:

LCOOU has established a policy that designated its summer term as a trailer of the academic year for all students. We also reserve the right to make different designations for different educational programs, or different students, as long as we ensure that there is no overlap in academic years.

LCOOU has opted to establish the summer term as a trailer to benefit students who may wish to use their Year-Round PELL as long as they meet eligibility requirements. Students must attend at least half-time in the summer term to receive the 150% PELL LEU per award year. Please contact the Financial Aid Department if there are questions regarding the summer term and financial aid usage.

Financial aid does not disburse any aid until June 9, 2024. Pell disbursements occur starting the 3rd week of the semester (on or before June 14, 2024) if no issues exist (i.e. FAFSA/verification is complete and/or high school completion information is on file). BIA awards and private scholarships are typically disbursed toward the end of June or the beginning of July. Any subsequent funding will be disbursed bi-weekly throughout the semester for qualifying students and as administratively feasible.

Direct payment

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

Crediting a student's school account

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

Credit balances

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

Early disbursements

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

Late disbursements

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

Returning funds

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

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

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

Provision for books and supplies

Pell Grant-eligible students are given the option of getting a textbook authorization form to have a credit applied to the student's account on the virtual bookstore E-campus. The charges are accrued to the student's account and typically paid for from the first FA award disbursement. Students who choose to purchase books elsewhere can obtain ISBNs at www.lco.edu but must pay for their books out-of-pocket.

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

Notices and authorizations

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

LCOOU operates on a passive acceptance policy. Student awards are automatically accepted on behalf of the student unless otherwise declined through written communications.

Excess cash

The Chief Financial Officer and Financial Aid Office work together to ensure that any issues with excess funds are handled within the 3-day timeframe. The FAO will request the exact funds that should be in G5 and based on the request and backup paperwork, the Chief Financial Officer will draw down the requested amount.

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

PART 1.6 FINANCIAL AID COUNSELING

The foundation of most financial aid starts with the Free Application for Federal Student Aid (FAFSA) which can be found at <https://studentaid.gov/>. Students will need a unique ID which can be obtained through <https://studentaid.gov/>. Students will use this ID to sign the application. LCOOU school code is 017199.

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

Student Eligibility for Financial Aid

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

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

Cost of Attendance (Budget)

The cost of attendance (COA) is the cornerstone of establishing a student's financial need, as it sets a limit on the total aid that a student may receive for purposes of the TEACH Grant, Campus-Based programs, Stafford/PLUS loans, and is one of the basic components of the Pell Grant calculation.

The student cost of attendance budgets is reviewed every year and compared with the cost of attendance budgets at similar colleges and universities.

Tuition and Fees

This includes costs of rental or purchase of equipment (including equipment for instruction by telecommunications), materials, or supplies required of all students in the same course of study.

Tuition charges are capped at 15 credits and may be increased to reflect actual charges. To see current Tuition & Fees, please see the table here: <https://www.lco.edu/tuition-and-fees>

Room and Board

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

Books

A cost estimate for books and supplies is obtained. The actual cost incurred by an individual student varies among the student population.

Transportation

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

Personal Expenses

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

Dependent Care

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

Exceptions to Normal COA

Students who are enrolled less than half-time.

Only the costs for tuition and fees and allowances for books and supplies, transportation, room, and board for a limited duration, and dependent care expenses may be included as part of the cost of attendance (miscellaneous/personal expenses may not be included).

Professional Judgment

The Financial Aid Director has the authority to use **professional judgment** to adjust the cost of attendance on a case-by-case basis to allow for special circumstances (budget increase requests will be in writing and well-documented). Such adjustments will be documented in the student's file. Tuition may be increased to reflect actual charges.

INSTITUTIONAL ELIGIBILITY

SECTION 2

PART 2.1 GENERAL REQUIREMENTS

The Financial Aid Director is responsible for submitting timely and complete ECAR information to the Department of Education.

A copy of the E-App along with supporting documentation and submittal date is kept in the Financial Aid Director's Office (Room 202B).

The signed Program Participation Agreement is kept along with the E-App in the Financial Aid Director's Office. The Program Participation Agreement expiration date is September 30, 2024.

PART 2.2 UPDATING APPLICATION INFORMATION

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

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

Information reported on the E-app

- Institution Name, Address, Type, ID's
- Accrediting Agency
- Academic calendar, educational programs offered
- Approval listing of Title IV programs

- Officials Listing
- Additional locations
- Vocational/Non-degree programs
- Ownership

PART 2.3 ADMISSIONS POLICY FOR PUBLIC OR PRIVATE NONPROFIT EDUCATIONAL INSTITUTION, PROPRIETARY INSTITUTION OF HIGHER EDUCATION, AND POSTSECONDARY VOCATIONAL INSTITUTION

Statement of Admissions

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

1. Supply proof of high school, GED, or HSED completion. The only exception is:
 - a. High School seniors may enroll in LCOOU courses with the approval of both college officials and the high school principal or counselor. Upon high school graduation, credits will become official.
2. Provide official transcripts from all post-secondary institutions attended.
3. If Native American, supply proof of tribal enrollment or a letter of tribal affiliation.
4. Individuals taking courses for personal enrichment may apply for exemption from this requirement in the Registrar's office.
5. A copy of the Social Security Card will be made and placed in the student's admission file.
6. Communicate with an assigned advisor from a major field of study.
7. Completion of the free application for Federal Student Aid (FAFSA) to determine financial aid eligibility and the process for payment of tuition and fees is required.

The steps stated above, and the signed Admission Checklist are necessary for admission to LCOOU. Failure to meet and complete the above by the end of the add/drop deadline will fail to obtain regular admission into the Lac Courte Oreilles Ojibwe University.

Statement of Financial Obligation

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

Re-entry, Readmission, and Catalogs

Students admitted to LCOOU must meet the academic requirements of the catalog they are originally admitted under. A student may, at any time, choose to follow the requirements under a newer catalog by talking with their advisor or the Registrar's office.

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

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

Admission of Transfer Students

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

Pre-registration

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

Late Registration

LCOOU may extend registration dates as dictated by the proper administrative authority.

Adding and Dropping Classes

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

Withdrawal from a course

Students officially withdrawing before the final semester drop date as determined by the curriculum committee will not have the withdrawn courses entered into their permanent record. Those students withdrawing after the term’s first drop date will have their records marked with a “W” for withdrawal. Students are reminded that once the admission clerk has entered their course, laboratory, or workshop selections into the University computer system, they are officially registered. Student charges are assessed the first business day after the semester drop date (census date); student accounts are charged with tuition and related fees for the courses selected. Accounts may be cleared of payments of fees owed or of a credit initiated by an Add/Drop form. Non-attendance does not constitute a withdrawal.

Students must complete official college withdrawal forms or receive a grade for the course. Failure to withdraw in writing may result in the imposition of full financial aid and academic penalties. A student may withdraw from any course up to the end of the 12th week of classes. No withdrawals will be accepted after the end of the 12th week of classes unless faculty or staff recommends an exception be made for an extreme case. A withdrawal may be granted at the discretion of the Academic Dean. If a student does not officially withdraw from a class, the final grade submitted by the instructor will be the grade listed on the student’s official transcript.

All mid-term and final F grades will be monitored and followed up on to determine R2T4s throughout the term. Financial aid staff will contact instructors and monitor Drop Out Detective and Canvas- an online system for attendance and grades.

Administrative Withdrawal

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

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

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

Withdrawal from the University

Students discontinuing their studies at LCOOU during the academic year must fill out the official forms. Students leaving the University before the semester's end without completing the prescribed forms may receive a grade of "F" for all incomplete courses and will not be eligible for any fee refunds.

Incentive Payments

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

NSLDS Process

Enrollment

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

Transfer Students – See Student Handbook for details

PART 2.4 STATE AUTHORIZATION

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

GENERAL PROVISIONS

SECTION 3

PART 3.1 CERTIFICATION

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

PART 3.2 TITLE IV REFUNDS

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

Withdrawal – Official Notification

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

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

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

Unofficial Withdrawal

A student who leaves LCOOU does not always notify the registrar's office of their withdrawal. There are two categories of these unofficial withdrawals for purposes of this calculation. First, if it is determined that a student did not begin the withdrawal process or otherwise notify of their intent to withdraw due to illness, accident, grievous personal loss, or other circumstances beyond the student's control, the withdrawal date is the date the school determines that the student ceased attendance because of the aforementioned applicable event.

The second category of unofficial withdrawals encompasses all other withdrawals where official notification is not provided. For these withdrawals, commonly known as dropouts, the withdrawal date is the midpoint of the payment period or period of enrollment, as applicable, or the last date of an academically related activity that the student participated in.

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

Leave of Absence Policy

The purpose of a leave of absence is to provide the student the opportunity to temporarily leave the University without penalty. Students who take a Leave of Absence must:

1. Make an appointment with the Financial Aid Director to discuss the need for a leave of absence.
2. Complete and submit a request for a Leave of Absence Form.
3. Provide written documentation to support the request for a leave of absence.

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

Leave of Absence Conditions and Requirements

The number of days in a leave of absence is counted beginning with the first day of the student's initial leave of absence in 12 months. The leave of absence cannot exceed 180 days in any 12 months. A student may only be granted one leave of absence during any 12 months. One subsequent leave of absence may be granted if

1. the subsequent leave does not exceed 30 days;
2. the institution determines that the subsequent leave of absence is necessary due to unforeseen circumstances; and
3. the total number of days of all leaves of absence does not exceed 180 days in any 12 months.

Subsequent leaves of absence may be granted for documented jury duty, military reasons, or circumstances covered under the Family and Medical Leave Act of 1993, provided that the total number of days of all leaves of absence does not exceed 180 days in any 12 months.

Note: A leave of absence need not consist of consecutive days when granted. It is the responsibility of the Director to monitor all leaves of absence to assure the University complies with the Federal Leave of Absence Regulations.

Institutional Withdrawal Notification

The Registrar's office will notify the Financial Aid Office by email of all students who drop or withdraw from classes and/or the University. The FAO will determine if the withdrawn student who has received Federal Title IV is subject to the Federal Refund Policy.

Return to Title IV Funds

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

Return of Title IV Procedure

LCOOU has enacted the following procedures for the Return to Title IV (R2T4) promptly:

Official Notification

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

Unofficial Notification

- Faculty will be required to provide attendance records for their classes, which will enable the Financial Aid Office to readily review student attendance and determine the exact dates for a student's unofficial withdrawal. With this date ascertained, R2T4 calculations will be able to commence accurately.
- Mid-term Grades will be the trigger for students who may have unofficially withdrawn. Students who have failing grades at mid-terms will be identified through Ellucian- Colleague and their attendance records will be reviewed. If attendance records show that a student has disengaged from the University and the financial aid office is fairly certain that they will not return, the R2T4 calculation can begin at that point. Otherwise, the calculations will begin 30 days from the end of the term
- Upon review of final semester grades, those students who have all failing grades who did not show up during the review of mid-term grades will be reviewed to determine the nature of failing grades. If a student unofficially withdrew after mid-term grades were posted but before the 60% of the semester mark has been passed, additional R2T4 calculations will be made for those students.
- All charges for tuition, fees, and room and board (if contracted with the school) are included for the completion of R2T4 calculations for those additional students.
- Institutional charges are used to determine the portion of unearned Title IV aid that the school is responsible for returning. The following educational expenses are considered institutional expenses for required course materials (books, kits, tools, supplies, etc.) if the student does not have a real and reasonable opportunity to purchase the required course materials from any place but the school.

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

School Portion of the Return

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

Student Portion of Return of Title IV Funds

After the school returns the correct amount of aid, any amount of the total unearned aid that remains becomes the student portion of the Return. The student portion of the Return is calculated by subtracting the amount of the school Return from the total unearned aid.

Total Unearned Aid (Subtract) School Return Amount (Equals) Student Portion of Return.

Return of Title IV Funds Web Product

LCOOU utilizes Ellucian- Colleague to facilitate R2T4 calculations. Each worksheet is calculated online and retained within the Ellucian-Colleague record system.

The Financial Aid Office requires the following documentation for data input into the Ellucian-Colleague system to calculate R2T4s:

- Withdrawal Form (if applicable)
- Attendance Records
- Student Account Inquiry

The last date of attendance, date of determination, aid that has been/could have been disbursed, along with qualifying charges are entered in as the documentation provides. The scheduled break days are recalculated and if less than 60% of the semester has been completed the amount required for the school to return will be completed within 30 days.

Student Notification

The Return of Title IV requirements are provided to the student in the admissions packet, online at <http://www.lco.edu>, catalog, and sent to their student email during the first week of each semester.

PART 3.3 COMPLIANCE AUDITS (Business Office)

LCOOU hires an outside audit firm, Wipfli, to conduct a compliance audit of Title IV funds administration and general-purpose financial statements. The audits are conducted after the fiscal year-end of June 30th and must be submitted to the Secretary no later than December 31st (6 months).

PART 3.4 CONSUMER INFORMATION

The Lac Courte Oreilles Ojibwe University is required by law to make available to enrolled students, prospective students, and their parent(s) information about its operations. Such information pertains to (1) general institutional operation, (2) financial aid, (3) general completion and graduation rates, and (4) annual security report.

To meet the requirement, information for the LCOOU is provided below. Website addresses are specified for all information items, as well as telephone numbers and e-mail addresses of the University officials who can respond to questions or information requests in their specific areas. If requested, LCOOU can provide hard copies of any of the information displayed on the website www.lco.edu.

Drug and Alcohol Policy –

LCOOU students and staff promote a healthy lifestyle by adhering to a policy of being drug and alcohol-free on campus and at all college functions.

Procedures for suspected abuse by students:

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

Referral Information:

LCOOU Administration 634-4790

LCO Community Health Center Alcohol and Drug Abuse Program 638-5105

Alcohol and Drug Abuse Information and Referral Center of Sawyer County 638-3317

Confidentiality of Student Records – Family Education Rights and Privacy Act of 1974

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

The Family Educational Rights and Privacy Act (FERPA) allows students certain rights concerning their education records. They are:

- 1. The right to inspect and review their education records within 45 days of the day LCOOU receives an access request.**

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

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

A student may ask LCOOU to amend a record that they believe is inaccurate or misleading by submitting a written request to the LCOOU officials responsible for the record, clearly identifying the part of the record to change, and specifying why it is inaccurate or misleading. LCOOU will notify the student of their decision and advise them of their

right to a hearing regarding the request for amendment. Additional information regarding the hearing will be provided to the student when notified of the right to a hearing.

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

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

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

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

Directory Information (Not subject to FERPA):

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

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

PART 3.5 VERIFICATION

LCOOU will not make interim disbursements for students who are picked for verification.

Forms and Documentation Reviewed:

A document review is completed before a student's file is completed and the packaging process begins. The following are the steps in this review process:

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

PART 3.6 PROFESSIONAL JUDGMENT& DEPENDENCY OVERRIDE

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

Dependent Student Override

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

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

PART 3.7 MISREPRESENTATION

Misrepresentation: Any false, erroneous, or misleading statement an eligible institution makes to a student enrolled at the institution, to any prospective student, to the family of an enrolled or prospective student, or to the Secretary.

Misrepresentation includes the dissemination of endorsements and testimonials that are given under duress.

Prospective student: Any individual who has contacted an eligible institution to request information about enrolling at the institution or who has been contacted directly by the institution or indirectly through general advertising about enrolling at the institution. Substantial misrepresentation: Any misrepresentation on which the person to whom it was made could reasonably be expected to rely, or has reasonably relied, to that person's detriment.

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

PART 3.8 ABILITY TO BENEFIT

LCOOU does not participate in Ability to Benefit.

FEDERAL WORK-STUDY POLICIES AND PROCEDURES

SECTION 4

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

PART 4.1 SELECTION & AWARDING OF STUDENTS

To qualify for FWS, students must meet all of the following:

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

Award Amounts

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

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

A student employee's work program and award amount can change before and during the academic year. Changes could be the result of changing financial circumstances, receipt of additional financial aid, a change in the number of enrolled credits, etc.

FAO Responsibilities

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

Employer Responsibilities

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

PART 4.2 ASSIGNING FWS JOBS

Hiring Process

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

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

Federal Work-Study Contract

Agreement with the student and the University that explains:

1. Rate of Pay and hours worked.
2. Beginning and end date of the contract
3. Injuries on the job
4. Benefits
5. Amendments to the contract
6. Abide by FWS guidelines.
7. Confidentiality
8. Employment requirements

Timecards

It is the supervisor's responsibility to approve work time through Ellucian- Colleague and the MyLCO module by Noon on the Monday following the previous work week. Late-time submissions will be processed during the next pay period.

Work Hours

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

Lunch/Breaks

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

Sick Days

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

Holidays

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

Rate of Pay

FWS students will earn \$15 per hour. This rate is evaluated periodically and may vary depending upon:

1. The skills needed to perform the job.
2. How many people with those skills are paid in the local area for doing the same type of job.
3. Rates the school would normally pay similar non-FWS employees.
4. Any applicable federal, state, or local laws that require a specific wage rate.

Paychecks

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

Summer Employment

Federal Work-Study summer employment capacity is determined by budget constraints and needs.

PART 4.3 FWS FISCAL PROCEDURES AND RECORDS

Transfers of Funds

Some provisions allow the transfer of funds among the Campus-Based programs.

LCOOU may transfer funds among Campus-Based programs as follows:

- Transfer up to 25% of FSEOG allocation to FWS.
- Transfer up to 25% of FWS allocation to FSEOG.

Carry Forward/Carry Back

LCOOU may carry forward from its current allocation up to 10% of FWS to spend in the next award year or carry back 10% of its FWS allocation to spend in the previous award year.

G5 Draw

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

Reconciliation

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

The reconciliation will tie out the following documents and explain any variances at a student level for correction before the next reconciliation meeting.

- The cash activity report from the COD system
- The disbursement registers from the G5 reporting system
- The award detail by fund report from the Ellucian-Colleague system
- A general ledger detail report from the Ellucian-Colleague accounting system

FEDERAL SUPPLEMENTAL EDUCATIONAL OPPORTUNITY PROGRAM (FSEOG) SECTION 5

PART 5.1 SELECTION AND AWARDING OF STUDENTS

The FSEOG Program provides need-based grants to help low-income undergraduate students finance the costs of postsecondary education.

Selection of Recipients

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

Awarding

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

PART 5.2 FSEOG FISCAL PROCEDURES AND RECORDS

Transfers of Funds

Some provisions allow the transfer of funds among the Campus-Based programs. LCOOU may transfer funds among Campus-Based programs as follows:

- Transfer up to 25% of FSEOG allocation to FWS.
- Transfer up to 25% of FWS allocation to FSEOG.

Carry Forward/Carry Back

LCOOU may carry forward from its current allocation up to 10% of FSEOG to spend in the next award year or carry back 10% of its FSEOG allocation to spend in the previous award year.

G5 Draw

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

Reconciliation

After the end of each month, the Financial Aid Director, and Chief Financial Officer will submit their documentation to reconcile Title IV disbursements.

The reconciliation will tie out the following documents and explain any variances at a student level for correction before the next reconciliation meeting.

- The cash activity report from the COD system
- The disbursement registers from the G5 reporting system
- The award detail by fund report from the Ellucian-Colleague system
- A general ledger detail report from the Ellucian-Colleague accounting system

FEDERAL PELL POLICY AND PROCEDURES SECTION 6

PART 6.1 CALCULATION PELL AWARDS

The amount of Pell for which a student is eligible within the academic year is determined by the Department of Education through the use of the Federal Methodology (FM) formula. An Expected Family Contribution (EFC) is determined through the FM calculation at the time the FAFSA application is received at the Dept. of Ed. division of Central Processing. The 2022-2023 maximum Pell grant amount is \$6,895 and is subsequently reduced in relation to the student's EFC. The amount of the student's actual award is dependent upon:

1. Degree plan
2. courses for which the student is registered.
3. Remaining Lifetime Eligibility,
4. Attempted course load (Full, 3/4 time, 1/2 time, less than 1/2 time
5. Student's Financial Aid status (Warning, Probation, Student Loan Default)
6. Attendance

The amount of Pell a student receives is based upon the student's ISIR/SAR. There are two ways to receive a SAR (Student Aid Report)

1. Electronically from the EDE exchange to the Ellucian-Colleague system
2. A student may bring in a hard copy.

When SAR is received the financial aid staff must check the following information.

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

If the SAR is flagged the student must complete a verification worksheet and submit signed copies of the IRS transcript for the prior year if the IRS Data Retrieval Tool was not used. The following six types of information must be verified:

1. Household size.
2. Number enrolled in post-secondary education.
3. Adjusted Gross Income.
4. Earned income from a W-2 if not required to file taxes but received a W-2.
5. U.S. income tax paid.
6. Other untaxed income not reported, such as workers compensation disability, etc:

Except:

- a. Social Security benefits.
 - b. Student aid
 - c. Foreign income exclusion.
 - d. Earned income credits.
7. Any other information that may be needed such as legal separation or divorce papers.

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

Packaging Procedures

After the individual student's financial need has been determined by using the proper cost of attendance minus the EFC, the Director of Financial Aid develops a financial aid package for the student using the Federal Pell Grant and determines the amount based on the financial aid package. The Federal Title IV programs available are Federal Pell, FSEOG, and Federal Work-Study. The amount of FSEOG and Federal Work-Study funds available from year to year is determined by the Department of Education. A student may be packaged up to his or her demonstrational need with a combination of Federal, State, and local scholarship aid.

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

PART 6.2 FEDERAL PELL GRANT REQUIRED & OPTIONAL RECALCULATIONS

Required Recalculations

Change in EFC

If a student's EFC changes due to corrections, updating, or an adjustment and the EFC would change the amount of the Pell award, Ellucian- Colleague automatically recalculates the award for the entire year.

Change in enrollment status between terms.

When a student changes their enrollment status between terms, Ellucian- Colleague updates the corrected enrollment, which changes the calculation to match the number of credit hours taken.

The student does not begin attendance in all classes within a term.

Faculty tracks attendance through Canvas and reports to the Registrar and FAO any student who never attended to the Registrar/FAO. When a student fails to attend a class before the census date they will be dropped for non-attendance and their enrollment status will be recalculated in Ellucian- Colleague.

Late Disbursements

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

Optional Recalculations

Change in enrollment status within a term.

Students who change enrollment status after the census date will not have their Pell Grant funds recalculated.

Change in Cost of Attendance

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

PART 6.3 FISCAL RECORDS AND DISBURSEMENTS REQUIREMENTS FOR FEDERAL PELL GRANT (From Part 1.5)

Fiscal Reports and Financial Statements

The FAO emails report that documents all financial aid transactions to the Business Office. The Business Office will post to General Ledger after they receive confirmation of the G5 drawdown (from the Office of Business Affairs) and the bank statement; showing the funds have been deposited into the bank account. Each Title IV program has its own General Ledger account number which documents individual transactions. These accounts are reconciled monthly.

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

Retention of Required Records

Paper records are maintained for 5 years; electronic records are kept indefinitely. Listing of required records:

- Institutional Student Information Record (ISIR)
- ISIR changes
- Verification paperwork
- Award Letter
- Software reports (Ellucian- Colleague, Microsoft Office)
- Return to Title IV Worksheets
- FISAP
- IPEDS
- ECAR
- PPA
- Supporting documentation to calculate completion and graduation rates
- All records about the administration of FSEOG, FWS, and Pell programs.

General Requirements

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

Examination of Records

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

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

PART 6.4 DISBURSEMENTS FOR BOOKS AND SUPPLIES

LCOOU disburses Title IV funding several weeks after the semester has begun, eligible students can receive a Textbook Authorization Form to use in purchasing their books from the University's virtual bookstore.

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

PART 6.5 IRAQ AND AFGHANISTAN SERVICE GRANT PROGRAM

An otherwise Pell-eligible student whose parent or guardian died as a result of U.S. military service in Iraq or Afghanistan after September 11, 2001, may receive increased amounts of federal student aid if the student was less than 24 years old when the parent or guardian died or was enrolled at an institution of higher education at the time of the parent or guardian's death.

Those eligible students will show up on the student SAR or the institution's ISIR with a "DoD Match Flag" and the comment code 298.

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

Zero EFC treatment for children of soldiers:

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

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

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

Iraq & Afghanistan Service Grant program:

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

Due to the sequester, all Iraq & Afghanistan Service Grant award amounts first disbursed on or after October 1, 2014, and before October 1, 2015, must be reduced by 7.3%. For example, for a student otherwise eligible for a Grant of

\$6,345 (the maximum Scheduled Award for 2020-21) the grant would be reduced by \$444.94 resulting in a grant of \$5,900.06.

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

These are two ways to receive a SAR (Student Aid Report)

3. Either electronically from the EDE changed to the Ellucian-Colleague system, or
4. A student may bring in a hard copy.

When SAR is received the financial aid staff must check the following information.

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

If the SAR is flagged the student must complete a verification worksheet and submit copies of the relevant IRS transcript if the IRS Data Retrieval Tool was not used. The following six types of information must be verified:

8. Household size.
9. Number enrolled in post-secondary education.
10. Adjusted Gross Income.
11. Earned income from a W-2 if not required to file taxes but received a W-2.
12. U.S. income tax paid.
13. Other untaxed income not reported, such as workers compensation disability, etc:

Except:

- a. Social Security benefits.
 - b. Student aid
 - c. Foreign income exclusion.
 - d. Earned income credits.
14. Any other information that may be needed such as legal separation or divorce papers.

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

OVER AWARDS

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

RECONCILIATION

After the end of each month, the Financial Aid Director and Chief Financial Officer will submit their documentation to reconcile Title IV disbursements.

The reconciliation will tie out the following documents and explain any variances at a student level for correction before the next reconciliation meeting.

- The cash activity report from the COD system
- The disbursement registers from the G5 reporting system
- The award detail by fund report from the Ellucian-Colleague system
- A general ledger detail report from the Ellucian-Colleague accounting system

AGREEMENTS BETWEEN SCHOOLS

SECTION 7

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

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

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

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

PART 7.1 CONSORTIUM AGREEMENT

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

Elements of the Consortium Agreement

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

Effective Date of the Agreement

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

PART 7.2 CONTRACTUAL AGREEMENT

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

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

Under a contractual agreement, the eligible school is always the home school. The home school performs all the aid processing and delivery functions for its students attending the ineligible school or organization.

FINANCIAL AID COMMITTEES

SECTION 8

The LCOOU Financial Aid Suspension Appeal Committee is currently comprised of four members that include:

- Financial Aid Director
- Chief Financial Officer
- TRiO/SSS Director
- Learning Center Program Coordinator

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

The LCOOU Scholarship Committee is currently comprised of four members that include:

- Financial Aid Director
- Records and Registration Specialist
- English Faculty Member
- TRiO/SSS Success Coach

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

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

Appendix A Segregation of Duties

EMPLOYEE RESPONSIBLE:	FIN. AID DIRECTOR	FIN. AID ASSISTANT	CFO	ACCTS. PAYABLE	ACCTNG. CLERK	BURSAR
TASKS						
DOE SOFTWARE						
ENTER THE STUDENT APP.	X	X				
DOWNLOAD ISIRS	X	X				
REVIEW ISIR	X					

SEND REQUEST LETTER TO STUDENT (IF NEEDED)		X				
RECEIVES DOCUMENTS		X				
REVIEW DOCUMENTS	X					
AWARDING PROCESS						
DETERMINES STUDENT ELIGIBILITY	X					
DETERMINES SCHEDULE OF AWARDS	X					
PREPARES AWARD LETTER		X				
REVIEWS AWARD LETTER	X					
MAILS AWARD LETTER		X				
DISBURSEMENT PROCESS						
INPUTS A 1P INTO THE UNIVS SYSTEM TO DISBURSE		X				
RUNS A TRIAL FAM 14 RPT	X	X				
RUNS A FINAL FAM 14 RPT	X	X		X		
DISBURSES TO STUDENT ACCOUNTS	X	X				
PREPARES DISBURSEMENT LIST	X	X				
INPUTS STUDENT DISBURSEMENT AMOUNTS						X
RUNS STUDENT CHECKS				X		
PUTS CHECKS THROUGH SIGNER					X	
ENTERS CHK NUMBERS, NAME, AND AMOUNTS INTO THE UNIVS SYSTEM					X	
DISTRIBUTES STUDENT CHECKS				X		X
TITLE IV FUNDS						
REPORTS ORIGATION RECORD TO ED	X	X				
EMPLOYEE RESPONSIBLE:	FIN. AID DIRECTOR	FIN. AID ASSISTANT	CFO	ACCTS. PAYABLE	ACCTNG. CLERK	BURSAR
REPORTS DISTRIBUTION RECORD TO DOE	X	X				
REQUESTS FUNDS FROM GAP USING FAM 14 RPT			X			
RECONCILES GENERAL LEDGERS			X		X	
OTHER FA RECEIVED						
INPUTS A 1P INTO THE UNIVS SYSTEM	X	X				
RUNS A TRIAL FAM 14 RPT	X	X				
RUNS A FINAL FAM 14 RPT				X		

PREPARES DISTRIBUTION LIST	X					
PREPARES/DISBURSES STUDENT CHECKS				X		
DEPOSITS CHECKS FROM AGENCIES			X			
RECONCILES GENERAL LEDGERS			X		X	
WORK-STUDY PROGRAM						
POSTS JOB DESCRIPTIONS EACH SEMESTER	X	X				
REVIEWS APPLICATIONS	X					
AUTHORITY TO FIRE AFTER INITIAL HIRING	X					
AWARDS WORK-STUDY BASED ON UNMET NEED	X					
NOTIFIES STUDENT, BUS. OFFICE & SUPERVISOR		X				
ENTERS AWARD/CONTRACT AMT. INTO UNIVS SYSTEM	X	X				
PROCESS WKLY PAYROLL					X	
PUTS THROUGH CK SIGNER					X	
ENTERS CK NUMBERS, NAME, & AMOUNT INTO THE UNIVS SYSTEM				X	X	
DISTRIBUTES CK TO EMPLOYEE				X		
RETURN OF TITLE IV FUNDS						
ENROLLMENT REPORTING		X				
R2T4 CALCULATIONS		X				
FUNDS PROCESSING	X					
FUNDS RETURN			X			

Appendix B

EXAMPLE OF DETERMINING FINANCIAL NEED AND SAMPLE AID PACKAGE

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

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

Student need and sample packaging:

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

2. Financial Aid offered
Federal Pell \$2000

	FSEOG	\$500
	FWS	\$1000
	Tribal Scholarship	\$1000
	Total Aid offered	<u>\$4500</u>
3.	Cost of attendance	\$8000
	EFC	-\$2000
	Aid offered	<u>-\$4500</u>
	Unmet need	<u>\$1500</u>

Packaging Policy Sample

I. Packaging Policy

Once a Financial Aid file is complete and the need is determined, the following packaging process will be followed:

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

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

If there are any questions or concerns, please contact the Financial Aid Department (FinancialAid@lco.edu)