

**CHAPTER 12**  
**FINANCIAL AID POLICIES AND PROCEDURES**  
**FOR THE**  
**LAC COURTE OREILLES OJIBWE COLLEGE**

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## **SUBCHAPTER 12.1 - GENERAL PROVISIONS**

### **§ 12.101      Title.**

- (1) This policy shall be known as the Financial Aid Policies and Procedures of the Lac Courte Oreilles Ojibwe College.

### **§ 12.102      Authority.**

- (1) This policy and procedure is enacted by Lac Courte Oreilles Ojibwe College Board of Regents pursuant to the Lac Courte Oreilles College Charter, Article XI section 19; “To develop general policies for the governance of the College and hold the College President accountable for administering them.”

### **§ 12.103      Purpose.**

- (1) It is the purpose of this policy is to:
  - a. Provide for the fair and equitable treatment of all enrolled or prospective students with the College; and
  - b. Provide a consistent practice in determining eligibility and distribution of financial aid for students enrolled with the College; and
  - c. Provide a guide for the management of all Title I and Title IV programs; or
  - d. Ensure all financial aid policies and procedures are current with all federal state and tribal regulations.

### **§ 12.104      Application.**

- (1) The Lac Courte Oreilles Ojibwe College philosophy of student financial aid takes into consideration that the majority of the students attending LCOOC are first generation college students. They may come to LCOOC both economically and educationally disadvantaged. Although most of the financial aid programs are on an as-needed basis, the financial aid staff makes every effort to provide funding for all students that have a demonstrated financial need. Even after funding to the limit of funds available, many students still have a high unmet need.

### **§ 12.105      Effective Date.**

- (1) Except as otherwise provided in specific sections, the provisions of this policy shall be effective on the date adopted by the Board of Regents.

### **§ 12.106      Interpretation.**

- (1) The provisions of this policy and procedural manual:
  - a. Shall be interpreted and applied as minimum requirements applicable to all actions or operations of the Financial Aid Office while conducting official college

- business.
- b. Shall be liberally construed in favor of the College.

**§ 12.107      Severability and Non-Liability.**

- (1) If any section, provision or portion of this policy is adjudged unconstitutional or invalid by a court of competent jurisdiction, the remainder of this policy shall not be affected thereby. The College further asserts immunity on its part and that of its agencies, employees, and/or agents from any action or damages that may occur as a result of reliance upon and conformance with this policy.

**§ 12.108      Public Access to Financial Aid Information.**

- (1) Any information about the College's Financial Aid policies and procedures are available on the College web site and or by e-mail, telephone or by mail. The financial aid application process comports with applicable College policies and regulations governing information.
- (2) Other information related to student records and financial determinations are protected from disclosure consistent with the College confidentiality policy and tribal and federal policies on student information. The College will exercise caution to ensure that protected information is not made public. Any questions regarding disclosure of financial aid information should be directed to the Office of the General Counsel.

**§ 12.109      Delegation of Authority.**

- (1) Generally, this Financial Aid policy delegates responsibility for all financial aid operations for the College to the College President, as established in Article XX, section 20.1 of the College Charter, the College President has the power to exercise or limit any procedures, agreements, or contracts including this Advancement policy.
- (2) Pursuant to Article XX, section 20.1, College President appoints and delegates the financial aid operations and Office of Financial Aid authority and the administration of this policy to the Financial Aid Director of the Office of Financial Aid (hereinafter "Director" or "Director of Office of Financial Aid") when s/he performs that function, regardless of any other job, position or title s/he may have. The Director shall issue operational procedures to implement this policy, subject to the approval of the College President.

## **SUBCHAPTER 2.2 – DEFINITIONS**

### **§ 2.201     General Definitions.**

Any term not defined in this Section shall be given its ordinary meaning. The following terms, wherever used in this policy, shall be construed to apply as follows, except where the context indicates otherwise:

- (1) **“Office of Financial Aid” or “Financial Aid Office”** a department of the College responsible for the administration and distribution of financial aid for the Lac Courte Oreilles Ojibwe College. The Office consists of the Director and other personnel as assigned.
- (2) **“Director of Financial Aid”** means the official authorized by the College President to administer the operations and distribution of financial aid on behalf of the College. For the purpose of this policy, the term includes any College employee designated and authorized to perform the duties of the Director. The Director leads the Office of Financial Aid for the Lac Courte Oreille Ojibwe College.
- (3) **“General Counsel”** means the authorized legal representative of the Lac Courte Oreilles Ojibwe College, the Regents, the faculty, students, and staff.
- (4) **“Board of Regents”** means the Lac Courte Oreilles Ojibwe College Board of Regents as established by the Lac Courte Oreilles Ojibwe College Charter.
- (5) **“College”** means the Lac Courte Oreilles Ojibwe College.
- (6) **“College President”** means the Chief Education/Administrative Officer of the Lac Courte Oreilles Ojibwe College.
- (7) **“Chief of Staff”** means the second ranking member for the operations of the Lac Courte Oreilles Ojibwe College, often operating as acting President.
- (8) **“Business Office”** a department of the College responsible for the financial operations of the Lac Courte Oreilles Ojibwe College, consisting of a chief financial officer, staff accountants and other personnel.
- (9) **“College Charter” or “Charter”** means the Restated Articles of Incorporation for the Lac Courte Oreilles Ojibwe College. The original document that established the College by the Lac Courte Oreilles Tribal Governing Board.

### **§ 2.202     General Acronyms.**

Any acronym not defined in this Section shall be given its ordinary meaning. The following acronyms, wherever used in this policy, shall be construed to apply as follows, except where the context indicates otherwise:



- (1) **CFR** – Code of Federal Regulations
- (2) **ROI** – Release of Information
- (3) **Title I** – Title I, Part A (Title I) of the Elementary and Secondary Education Act, as amended by Every Student Succeeds Act (ESEA) provides financial assistance to local educational agencies (LEAs) and schools with high numbers or high percentages of children from low-income families to help ensure that all children meet challenging state academic standards. Federal funds are currently allocated through four statutory formulas that are based primarily on census poverty estimates and the cost of education in each state
- (4) **Title IV** – Title IV financial aid is federally funded aid such as Federal Pell Grant, Federal Supplemental Educational Opportunity Grant (FSEOG), Federal Perkins Loan, Federal Subsidized and Unsubsidized Direct Loans.
- (5) **SAP** – Satisfactory Academic Progress
- (6) **FERPA** – Family Educational Rights and Privacy Act
- (7) **ECAR** – Eligibility and Certification Approval Report
- (8) **PPA** – Program Participation Agreement
- (9) **LCO** – Lac Courte Oreilles Band of Chippewa Indians
- (10) **ADA** – Americans with Disabilities Act, 42 USC §12111(s)(b)
- (11) **R2T4** – Return of Title IV funds
- (12) **IFAP** – Information for Financial Aid Professionals
- (13) **NASFAA** – National Association of Student Financial Aid Administrators
- (14) **Pub. L.** – Public Law
- (15) **RFP** – Request for Proposals
- (16) **COLLEGE** – Lac Courte Oreilles Ojibwe College
- (17) **U.S.C.** – United States Code

## **SUBCHAPTER 12.3 – AUTHORITY AND ADMINISTRATIONS**

### **§ 12.301      General.**

- (1) 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.

### **§ 12.302      Institutional and Division Structure.**

#### **REGISTRATION**

##### **(1) Registrar**

- a.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.

#### **2. FINANCIAL AID**

##### **(1) Financial Aid Director**

- a.General Summary: Responsible for administering all financial aid awarded in accordance with applicable rules and regulations.

##### **(2) Financial Aid Counselor**

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

#### **3. BUSINESS OFFICE**

##### **(1) Chief Financial Officer**

- a.General Summary: Responsible for financial reporting, internal controls and direction of all business office staff. Also responsible for drawing federal funding through G5 Fund Facility.

##### **(2) Lead Accountant**

- a.General Summary: Responsible for posting student transactions in Jenzabar. Reconciliation of G5 transactions with Financial Aid Office and Office of Business Affairs. Responsible for student accounts including tuition/ fees billing, financial aid distribution refunds, student accounts receivables recording, and monitoring of student account balances. This position is also responsible for collection of delinquent accounts, establishing student payment plans, and all third-party billing.

### **§ 12.303      Financial Aid Office and Position Responsibilities.**

- (1) The Financial Aid office is currently composed of two full time staff members, the Director of Financial Aid and the Financial Aid Counselor.

- (2) The essential job functions of the Director of Financial Aid are as follows:
- a. Coordinating and managing all financial aid programs and ensuring compliance with all federal, state, and institutional regulations policies and procedures.
  - b. Developing, modifying, implementing, and maintaining the application intake and tracking process for documentation of all awards for an audit trail.
  - c. Providing requested reports to reviewing agencies, such as auditors, program reviewers, and accreditation teams. Providing financial aid counseling to students and families regarding the application procedures and eligibility requirements for student aid programs and assisting students and their families with the application forms.
  - d. Collaborating with the Business Office to ensure accurate and timely exchange of information and awards between school information systems. Overseeing monthly reconciliation processes.
  - e. Facilitate coordination and communication between college departments relating to financial aid opportunities, satisfactory academic progress, student eligibility, policies & procedures, and federal compliance.
  - f. Evaluate grade reports and student transcripts ensuring students are meeting satisfactory academic progress (SAP) and communicating any unsatisfactory academic progress to applicable parties (student, advisor, Dean of Student Affairs, etc.) Ensuring the Return of Title IV (R2T4) calculations are correct and accurate.
  - g. Establish and lead the Financial Aid Appeals Committee for SAP/Special Circumstances and ensuring members follow procedural and regulatory requirements.
  - h. Notify students of appeal outcomes for financial aid determinations.
  - i. Create and conduct financial aid presentations and participate in outreach activities.

(3) The essential job functions of the Financial Aid Counselor are as follows:

- a. Provide students, prospective students, and parents with financial aid assistance.
- b. Acquire student data and reports from external systems for documentation, updating, and review.
- c. Follow Federal, Tribal, State, VA, and other funding source's rules and regulations.
- d. Attend all required trainings for financial aid regulations.
- e. Assist in creating and maintaining student files.
- f. Notify and request required documentation from students for file completion and eligibility determination.

- g. Assist in distributing information on financial aid, scholarships, and FWS program.
- h. Interpret and explain State & Federal regulations to parents and students.
- i. Maintain and ensure confidentiality of all student records and information.
- j. Assist student financial aid applicants and recipients by providing accurate information, appropriate materials, and procedural instructions for applying to various sources for financial aid.
- k. Answer questions or requests of students, parents, staff in person, in writing, or by telephone regarding financial aid eligibility and awards.

**§ 12.304      Accommodation for People with Disabilities**

(1) ADA Access and Accommodations

- a. LCOOC is committed to ensuring programs, services, and activities are accessible to individuals with disabilities through its compliance with state and federal laws. The College recognizes that individuals with disabilities may need accommodations to have equally effective opportunities to participate in or benefit from its programs, services, and activities.
- b. The Financial Aid office complies with the special needs of students with disabilities and ADA requirements.
- c. The office is located on the main floor of the Main Campus and is fully accessible for students with disabilities. If other needs arise, reasonable arrangements can be made by the Dean of Academic Affairs and Dean of Students.
- d. To receive accommodations and services students must meet with the Institution's Disability Coordinator to complete the required paperwork and provide documentation.
  - i. The Disability Coordinator's contact information is as provided:
    - 1) Roxanne Martinson, (715)-634-4790 ext. 123, [rmartinson@lco.edu](mailto:rmartinson@lco.edu)

**§ 12.305      Appointments with Staff**

- (1) The Financial Aid office ensures assistance is available for student inquiries and access during regular business hours, Monday - Friday 8:00 am - 4:30 pm. The Financial Aid office maintains an open-door policy, but appointments can be made through the Financial Aid Department or Front Desk Receptionist.
- (2) Students may contact the financial aid office/front desk by phone, email, or in person to make appointments.

- (3) The information needed to schedule an appointment is, student's name, phone number, and reason for the appointment. This allows the Director of Financial Aid staff members to ensure any information needed before the appointment is available and the student is reachable in case of a need to reschedule.

**§ 12.306      Treatment of Correspondence/Forms**

- (1) All incoming mail received enters the Front Desk Receptionist area where this person sorts mail and directs to the intended recipients. The Financial Aid office checks mail frequently throughout the day ensuring any student information and documents received are processed in a timely manner.
- (2) Email correspondence is also checked frequently and attended to in a timely manner.
- (3) Any documents received containing student information is kept in student files which are stored locking file cabinets.

**§ 12.307      Telephones**

- (1) Students are encouraged to reach the Financial Aid Office by the main line (715) 634-4790 and requesting to be transferred to the Financial Aid office. If students would like to reach the financial aid office directly, they must dial extension 103 when prompted.
- (2) Due to the Family Educational Rights and Privacy Act (FERPA), only general information will be given unless a release of information (ROI) is on file with the office.
- (3) Students who may have in-depth questions are encouraged to meet with the Director of Financial Aid on campus.
- (4) Any electronic communications between the Financial Aid office and students is done specifically through the LCOOC email accounts.
- (5) The Financial Aid Office will only release general information over the phone unless verbal permission is given to release specific in-depth information. In which case, the student will be required to verify identity at least two times to ensure the students privacy is respected.

**§ 12.308      Confidentiality of Student Records**

- (1) Lac Courte Oreilles Ojibwe College follows guidelines and regulations for student records confidentiality as established under the Family Educational Rights and Privacy Act (FERPA) and the College's own policy of Confidentiality.
- (2) In accordance with FERPA, the Financial Aid office does not release any student information to individuals other than the student.
- (3) All enrolled students must complete the FERPA form with the Registrar and list all individuals whom they wish to give access to their student information.
- (4) The Financial Aid office will not disclose any student information unless a current Release

of Information is on file with the office.

**§ 12.309      Records Management and Retention**

- (1) The Financial Aid office is responsible for the creation and maintenance of all students financial aid records.
- (2) All student financial aid records will be maintained and retained by the College for up to four calendar years after the date of graduation or the date withdrawal from the college.
- (3) All financial files are kept in the Financial Aid Office; only financial aid staff are allowed access to student files.
- (4) Prior year files are kept in locked file cabinets. Once the deadline has passed for retention, all files are shredded.
- (5) Beginning the academic year 2020-2021 student files will be stored electronically in a secure folder with access rights to reduce waste and preserve natural resources. The same retention periods apply to the electronic files.

**§ 12.310      Safeguarding Electronic Records**

- (1) Files stored electronically are backed up twice daily to prevent data loss.
- (2) The electronic student financial aid files are only accessible by Financial Aid or Information Technology staff.

**§ 12.311      Family Educational Rights and Privacy Act**

- (1) The Family Educational Rights and Privacy Act (FERPA) is a federal law that protects the privacy of students' education records.
- (2) The term "education records" means those records that are:
  - a. directly related to a student; and
  - b. maintained by an education agency or
  - c. postsecondary institution or
  - d. by a party acting for the agency or institution.
- (3) At the postsecondary level, FERPA affords eligible students with certain rights.
- (4) FERPA defines an "eligible student" as a student:
  - a. who has reached 18 years of age; or
  - b. any student is attending an institution of postsecondary education at any age.
- (5) All staff and faculty employed at LCOOC are required to go through annual FERPA training.
- (6) The College policies under FERPA guidelines are:

- a. Student financial aid records can only be viewed by the student
  - b. Students are encouraged to be present when seeking information about their financial aid packages.
  - c. If students are requesting information via phone, they will be prompted to verify identity at least two times,
  - d. Any email conversations will be done strictly through LCOOC's email servers.
  - e. No specific information will be given such as dollar amounts will be given without permission from the student on phone conversations.
- (7) Please view the consumer information located on our website at <https://www.lco.edu/righttoknow> or the student handbook or more information regarding confidentiality of student records.

**§ 12.312      Internal Disclosure under FERPA**

- (1) As allowed under FERPA, Lac Courte Oreilles Ojibwe College has the right to release student records **without student consent** under certain conditions. Examples of release without consent include the following individuals and agencies:
- a. Appropriate school officials with a legitimate educational interest.
  - b. Specified officials for audit, accrediting, or evaluation purposes.
  - c. Appropriate parties in connection with providing financial aid to a student.
  - d. Appropriate officials in cases of health and safety emergencies.
  - e. State and local authorities pursuant to specific State law.
  - f. Compliance with a judicial order or lawfully issued subpoena.
  - g. Military recruiting personnel, under the Solomon Amendment of the National Defense Authorization Act. In addition to directory information, Lac Courte Oreilles Ojibwe College may disclose address, telephone number, and date of birth.
  - h. The National Student Clearinghouse for the purpose of providing enrollment and graduation verification to employers and financial lenders.
  - i. Another educational agency or institution, where a student intends to enroll, is enrolled, or from which a student receives services.
- (2) A student may direct that any or all the directory information be withheld from public disclosure by notifying the Registrar in writing. The non-disclosure request will be permanent unless the student requests otherwise.
- (3) Student Interns will be required to sign a confidentiality disclosure form upon hire protecting student information being disclosed to any outside parties.

**§ 12.313      External Disclosure**

- (1) Lac Courte Oreilles Ojibwe College's Financial Aid Office will not permit access to or the release of personally identifiable information contained in student educational records without the written consent of the student to any third party (including parent/guardian, dependent, or spouse/domestic partner), except as authorized by FERPA or other applicable law.
- (2) A student may grant consent by completing an Authorization to Release Student Information form, available from the Registrar's Office.
- (3) Upon request from an external agency for student information, the financial aid office will request a signed copy of consent to release for the student's file.
- (4) After the consent form is received and lists the specific information the external agency is requesting, the financial aid office will share the information.
- (5) If no consent form exists or the consent form does not specifically list the information requested, no information will be given.

**§ 12.314      Authorization Consent Form**

- (1) The LCOOC provides a form for students who wish to grant access or to redisclose their information, this form is available on the College website or is available in the Registrar's Office.
- (2) The form must state the students name and address, it must also include the student identification number; a valid signature and date; the name and address of all individuals who should be granted access to the student's financial aid information.
- (3) The authorization form is valid for one academic year and must be completed each year student wishes to allow access to their information of certain individuals.
- (4) The types of education information these forms give authorization to are:
  - a. Enrollment records; or
  - b. Financial Aid Package Information (student's application is complete, missing documents, etc.); or
  - c. Other educational information that is specifically listed by the student.

**§ 12.315      Staffing and Training.**

- (1) The College ensures that all financial aid staff have training and experience commensurate with the requirements of their duties. The College has implemented training and experience standards for all financial aid positions and periodically review their operations to ensure that all staff meet those standards.



## **SUBCHAPTER 12.4 – FINANCIAL AID PROGRAMS**

### **§ 12.401      Institutional Eligibility Requirements**

- (1) To participate in the Title IV, HEA programs, the school must meet one of the following definitions of an eligible institution:
  - a. Institution of higher education
  - b. Proprietary institution of higher education; or
  - c. Postsecondary vocational institution
- (2) Lac Courte Oreilles Ojibwe College does this by meeting the definition of an Institution of higher education.
- (3) The Financial Aid Director maintains the documentation that substantiates the school's institutional eligibility.
- (4) Such documents include, but are not limited to:
  - a. Program Participation Agreement (PPA),
  - b. Eligibility and Certification Approval Report (ECAR),
  - c. Accrediting agency letters
- (5) It is LCOOC's policy to make accreditation and licensing information and documentation available to enrolled and prospective students. Currently LCOOC's certification expiration is December 31, 2024 according to the PPA.
- (6) LCOOC must periodically undergo recertification of its eligibility.
- (7) The duration of eligibility is primarily linked to the expiration of its PPA.
- (8) The Financial Aid Director works with the Dean of Student Affairs and the Dean of Academic Affairs, and Chief Financial Officer to coordinate the recertification process.

### **§ 12.402      Program Eligibility.**

- (1) To qualify as an eligible institution, the College must offer at least one eligible program.
- (2) It is the College's responsibility to ensure a student is enrolled in an eligible program before disbursing Title IV, HEA aid.
- (3) The current eligible programs offered at LCOOC leading to a two year- associate degree are:
  - a. Agriculture and Natural Resource Management Accounting
  - b. Human Services Liberal Arts
  - c. Native American studies Pre-Nursing
  - d. Science
  - e. Small Business Administration

- (4) The above degrees are measured in credit hours and offered in standard term semesters.
- (5) The current eligible programs offered at LCOOC leading to one year- certificates and adhere to gainful employment requirements are:
  - a. AODA Certificate
  - b. Culinary Arts Certificate
  - c. Native American Art Certificate
  - d. Native American Tribal Management Certificate Ojibwe Language Specialty Certificate
  - e. Tribal Court Lay Advocate Certificate
  - f. Early Childhood Certificate
- (6) The current eligible programs offered at LCOOC leading to a four year- bachelor's degree are:
  - a. Human Services
  - b. Business Administration
- (7) The Financial Aid Director will be notified of any changes to the information that is reported on the E-App (see list below).
- (8) This information must be reported to the Secretary within 10 days of the change. The Financial Aid Director will be responsible for coordinating the response to the Secretary in regard to any reported changes that affect the institution's eligibility and the effective date of the response.
- (9) Information reported on the E-app:
  - a. Institution Name,
  - b. Address,
  - c. Type,
  - d. ID's Accrediting Agency
  - e. Academic calendar,
  - f. Educational programs offered Approval listing of Title IV programs
  - g. Officials Listing Additional locations
  - h. Vocational/Non-degree

**§ 12.403      Ineligible Programs**

- (1) An ineligible degree program for the purposes of awarding Title IV, HEA aid is one that is not listed on the ECAR and does not ultimately end with a certificate or degree.

**§ 12.404      Evaluation of New Programs**

- (1) The Dean of Academic Affairs has a three-phase program development process that comprehensively looks at concepts, operating budgets, and curriculum before submitting new program proposals to the Executive Council for the College.

- (2) If the Executive Council recommends approval the College President, the Board of Regents will review and make a final determination to approve the proposed program.
- (3) Upon approval, the Dean of Institutional Research then submits the proposal to HLC, the institution's accrediting agency.
- (4) When the accrediting agency approves the programs and the programs lead to certificate or degree, the Financial Aid Director will update the E-App and submit to the Federal Department of Education.

**§ 12.405      Administrative Capacity**

- (1) The Lac Courte Oreilles Ojibwe College administers all Title IV, HEA program in accordance with all applicable statutory and regulatory provisions.
- (2) The Director of Financial Aid oversees all FSA programs along with all other state, local, tribal, and external financial aid programs ensuring administrative capabilities in accordance to applicable regulations.
- (3) The Financial Aid office uses interdepartmental communications, data integration between Jenzabar EX and PowerFAIDS to collect and correlate student financial aid information.
- (4) The Financial Aid office can administer financial aid awarded in accordance with applicable rules and regulations.

**§ 12.406      Responsibilities of Institutional Offices**

- (1) The Financial Aid office works with various College departments with respect to the approval, disbursement, and delivery of Title IV, HEA program assistance.
- (2) The Director of Financial Aid works with various offices with respect to preparations and submission of reports to the Department of Education (ED).
- (3) The other College Departments assisting in the administration of Title IV, HEA programs with respect to the:
  - a. Academic Affairs
    - i. Assisting with administrative withdrawals Advising adding/dropping courses
    - ii. Meeting with students who are considering withdrawing from all courses Assisting in compiling reports
    - iii. Ensuring midterm/final grades are posted in timely manner Attendance policies & requirements
    - iv. Satisfactory Academic Progress
  - b. Registrar's Office
    - i. Entering student enrollment & chosen degree programs Confirming high

- school graduation
  - ii. Confirming valid identification and tribal enrollment Completing degree audits for student graduation Finalizing student enrollment lists
  - iii. Assisting in compiling reports
- c. Business Office
  - i. Draw down funds for Title IV, HEA programs from ED's G5 website
  - ii. Reconciling funds with financial aid office
  - iii. Applying tuition and fees
  - iv. Disbursing financial aid funds
  - v. Printing financial aid refunds
  - vi. Handling Title IV HEA credit balances
  - vii. Assisting in compiling reports

**§ 12.407      Separation of Duties.**

- (1) The Financial Aid office must administer the Title IV, HEA programs with adequate checks and balances in its system of internal controls. The functions of authorizing payments and disbursing or delivering Title IV, HEA funds must be divided among organizationally independent individuals, so no office has responsibility for both functions.

**§ 12.408      Records.**

- (1) The Lac Courte Oreilles Ojibwe College must establish and maintain records as required under the general provisions and individual Title IV, HEA program regulations.
- (2) PowerFAIDS is the software program which is used solely by the financial aid office to manage all aspects of financial aid. PowerFAIDS interacts with Jenzabar® EX which is a comprehensive, fully-scalable administrative platform designed specifically for use in Higher Education. Members of an institution's ecosystem are connected with a centralized database that can be implemented out-of-the-box and rapidly deployed. Jenzabar EX provides interoperable workflows that adapt as institution policies change and technology evolves.

**§ 12.409      Electronic Processes.**

- (1) The Lac Courte Oreilles Ojibwe College has a student records program called PowerFAIDS that manages all aspects of financial aid. The only personnel who have access to this system are the Financial Aid Director and the Financial Aid Assistant. PowerFAIDS interfaces with all other departments through Jenzabar which is an ERP system that was purchased in 2008.
- (2) EdConnect is the software program that is used to download student ISIR files from CPS. The file is imported into the PowerFAIDS system. All ISIR's are printed so that a hard copy can be placed into each student's file and to determine those selected for

verification by the Department of Education. Students with questionable or conflicting data will be selected for verification by the Financial Aid Department.

- (3) PowerFAIDS is designed to handle all processes of packaging, budget construction, requesting verification documents and file review. Jenzabar transfers SAP determinations into PowerFAIDS, which is coded for determining financial aid eligibility.
- (4) Financial aid documents are kept in electronic format on the software programs that are utilized by the Financial Aid office. However, paper documents pertaining to students will be placed in their individual file folders located in the Financial Aid Office and/or as required by law or deemed necessary by Financial Aid personnel. Audits of these files are completed at least once per year.
- (5) The Lac Courte Oreilles Ojibwe College Information Technology department backs up all networked resources on premises from one server to another on a daily basis.
- (6) Security measures for financial aid information are put in place to protect private information through the use of passwords and access rights assigned to each authorized college staff member. For instance, in Jenzabar, each staff member is only given access to those areas that are used to accomplish their job duties. PowerFAIDS is only active on two desktops in the financial aid office and protected by system passwords and software passwords.

**§ 12.410      Checking Validity of High School Completion.**

- (1) No enrolled student without valid high school completion records on file in the registrar's office will be awarded or disbursed any Title IV, HEA program assistance or any other financial aid. The financial aid office works closely with the Registrar's Office ensuring official records are submitted by the party granting high school completion on behalf of the student.
- (2) The Director of Financial Aid reviews and processes all documents submitted to the Financial Aid Office from the Title IV, HEA applicants. The Financial Aid office refers for investigation to ED's Office of Inspector General (OIG) and credible information indicating a Title IV, HEA aid applicant may have engaged in fraud or other criminal misconduct in connection with the Title IV, HEA programs.
- (3) The Director of Financial Aid compares the submitted documentation to that reported on the FAFSA and makes corrections as necessary. Information received that indicates blatant fraud is then turned over to the OIG.

**§ 12.411      Reviews and Proceedings.**

- (1) In order to show administrative capability, Lac Courte Oreilles Ojibwe College must show no evidence of significant problems that affect their ability to administer a Title IV, HEA program, as identified in:

- a. Program reviews conducted by ED, an accrediting agency, or a state agency  
Internal audits
  - b. Finding made in any criminal, civil, or administrative proceeding
- (2) An outside accounting firm acts as College's liaison to assist in preparing for audits, this firm is CliftonLarsonAllen LLP from Minneapolis, MN. Results of all program reviews and audits are maintained by Business Office and with the College President.

**§ 12.412      Cohort Default Rate.**

- (1) As a benefit to our students, the Lac Courte Oreilles Ojibwe College does not participate in any Title IV student loan programs. Therefore, declaring cohort default rates does not apply to the institution.

**§ 12.413      Financial Responsibility.**

- (1) The Director of Financial aid is responsible for compliance with all financial standards to participate and maintain eligibility for Title IV, HEA programs.

**§ 12.414      Reporting and Reconciliation.**

- (1) Fiscal Operations Report and Application to Participate
- a. The Financial Aid Director compiles and submits the Fiscal Operation Report and Application to Participate (FISAP) annually by October 1st.
  - b. Working closely with Student Affairs, the Business Office, and Enrollment Management, the required data is extracted through Jenzabar EX and PowerFAIDS. This information is then reported to ED regarding the campus-based programs on the FISAP.
  - c. The Director of Financial Aid maintains all backup data for the FISAP in a file on the secured financial aid server along with hard copies of instructions in the financial aid office.
- (2) National Student Loan Data System
- a. The Director of Financial Aid electronically reports student financial aid information regarding the Federal Pell Grant, Federal Supplemental Opportunity Grant (FSEOG) to COD throughout the semester. COD reports financial aid information to the National Student Loan Data System (NSLDS). The interim Registrar submits enrollment reporting to the National Student Clearinghouse and verifies all information being sent to NSLDS is accurate.
- (3) Program-Specific Reporting
- a. NSLDS Enrollment reporting is completed by the Registrar who reports enrollment data to the National Student Clearinghouse. Federal Pell Grant and

Federal Supplemental Educational Opportunity Grant (FSEOG) are reported by the Financial Aid office to COD.

- b. The Registrar works closely with the Dean of Academic Affairs ensuring National Student Clearinghouse reporting requirements are completed in a timely manner. This includes following up with any error reports received from the National Student Clearinghouse and ensuring all rejected records are resolved within the required timeframe.
- c. Individual student Federal Pell Grant & FSEOG award amounts are reported to COD through the use of EDconnect. These awards are reconciled on a monthly basis by the Pell Grant Reconciliation Report imported through Edconnect and PowerFAIDS. Further reconciliation procedures are comparing fund amounts located in G5, COD, and disbursement rosters.

**§ 12.415      General Title IV Student Eligibility Requirements.**

(1) To be Eligible to receive Federal Student Aid, you will need to:

- a. Qualify to obtain a college or career school education, either by having a high school diploma or General Educational Development (GED) certificate, or by completing a high school education in a homeschool setting approved under state law.
- b. Be enrolled or accepted for enrollment as a regular student in an eligible degree or certificate program.
- c. Be registered with Selective Service, if you are a male (you must register between the ages of 18 and 25).
  - i. Men exempted from the requirement to register include;
  - ii. Males currently in the armed services and on active duty (this exception does not apply to members of the Reserve and National Guard who are not on active duty);
  - iii. Males who are not yet 18 at the time that they complete their application (an update is not required during the year, even if a student turns 18 after completing the application);
  - iv. Males born before 1960;
  - v. Citizens of the Republic of Palau, the Republic of the Marshall Islands, or the Federated States of Micronesia\*;
  - vi. Noncitizens that first entered the U.S. as lawful non-immigrants on a valid visa and remained in the U.S. on the terms of that visa until after they turned 26.
- d. Have a valid Social Security number unless you are from the Republic of the Marshall Islands, Federated States of Micronesia, or the Republic of Palau.
- e. Completed a FAFSA and the school must have a current ISIR to start the initial eligibility process. Sign certifying statements on the FAFSA stating that:
  - i. you are not in default on a federal student loan
  - ii. do not owe a refund on a federal grant
  - iii. Sign the required statement that you will use federal student aid only for educational purposes Maintain satisfactory academic progress (SAP) while you are attending college or a career school.

- (2) The Pell Grant program does not require half time enrollment, but the student enrollment status does affect the amount of Pell a student may receive. A student may receive Pell for a total of 12 payment periods or 600%. Once the student has reached this limit, no further Pell may be received.
- (3) In addition, you must meet one of the following:
- a. Be a U.S. CITIZEN
    - i. You are a U.S. citizen if you were born in the United States or certain U.S. territories, if you were born abroad to parents who are U.S. citizens, or if you have obtained citizenship status through naturalization.
  - b. U.S. NATIONAL
    - i. If you were born in American Samoa or Swains Island, then you are a U.S. national.
  - c. Have a GREEN CARD You are eligible if you have a Form I-551, I-151, or I-551C, also known as a green card, showing you are a U.S. permanent resident.
  - d. Have an ARRIVAL-DEPARTURE RECORD
    - i. You're Arrival-Departure Record (I-94) from U.S. Citizenship and Immigration Services must show one of the following:
      - 1. Refugee Asylum Granted
      - 2. Cuban-Haitian Entrant (Status Pending)
      - 3. Conditional Entrant (valid only if issued before April 1, 1980)
      - 4. Parolee
  - e. Have BATTERED IMMIGRANT STATUS
    - i. You are designated as a "battered immigrant-qualified alien" if you are a victim of abuse by your citizen or permanent resident spouse, or you are the child of a person designated as such under the Violence Against Women Act.
  - f. Have a T-VISA
  - g. You are eligible if you have a T-visa or a parent with a T-1 visa.
- (4) Not be enrolled simultaneously in elementary or secondary school
- (5) Not have been convicted of an offense involving the possession or sale of illegal drugs that occurred while the student was enrolled and receiving Title IV aid
- (6) Student Determination
- a. The Registrar enrolls students in their programs and courses making the determination if the student is a regular student or special student (audit, elder, dual enrolled, etc.). All eligibility requirements are verified by ED, except Satisfactory Academic Progress, when the student files their FAFSA. All discrepancies are investigated by the Financial Aid office and any conflicts/changes of information are reported to ED through ISIR corrections.

**§ 12.416 Federal Aid Programs.**



- (1) Lac Courte Oreilles Ojibwe College participates in the following federal student aid programs.
- (2) Federal Pell Grant - The Federal Pell Grant is designed to help needy undergraduate students pay for their educational costs. For many students, the Federal Pell Grant provides a foundation of financial aid to which other forms of federal and non-federal aid may be added. Unlike student loans, the Federal Pell Grant does not have to be paid back if a student completes the award period in which the Federal Pell is awarded. Eligibility for the Federal Pell Grant and the amount of the award is based on educational cost and enrollment status. Students must meet the eligibility requirements and submit a completed FAFSA for Federal Pell Grant consideration. The maximum award amount for the 2020-2021 academic year is \$6345
- (3) Federal Supplemental Educational Opportunity Grant (FSEOG) - FSEOG provides need-based grants to help low-income undergraduate students finance the costs of postsecondary education. When making FSEOG awards, LCOOC must give priority to those students with “exceptional need” (those with the lowest Expected Family Contributions, or EFCs) and those who are also Federal Pell Grant recipients. Once the priority students are awarded and funding is still available, LCOOC can award to those students with a higher EFC, and to those who are not Pell eligible. The maximum award amount for the 2020-2021 academic year is \$500
- (4) Federal Work Study (FWS) - The student must have a demonstrated unmet need to be eligible for employment. Students must have unmet need, meeting SAP, and be Pell eligible.
  - a. Disbursement Schedules
    - i. Financial aid does not disburse any aid until after the semester's census date. Pell disbursements occur starting the 5th week of the semester if no issues exist (i.e. FAFSA/verification is complete and/or high school completion information is on file). Subsequent disbursements occur bi-weekly after the first disbursement of the semester
- (5) Federal Work-Study Program
  - a. Students are emailed at the beginning of every semester a listing of available on campus internships. Available internship postings are also available on the student employment page of the institution's website. A Family Literacy Internships has been created specifically to meet the 7% community service requirement set by Department of Education.
  - b. The student must be enrolled at least half time and have a demonstrated unmet financial need. The student must also be eligible for the Federal Pell Grant and be meeting Satisfactory Academic Progress to be considered for Federal Work study.
  - c. Students will complete their employments packets with the Human Resources Director or Assistant. who will advise the Financial Aid office of an acceptable start date. Once the start date has been determined, the award amounts are based on the number of hours permitted per week at \$10 an hour up until the end of the semester or until financial need has been met.

- d. The Director of Financial Aid monitors the student earnings monthly when preparing FWS Draws and reconciliation of FWS funds. The Payroll Accountant will report paid wages to the Financial Aid Director
  - e. Fiscal Procedures & Recordkeeping
    - i. Lac Courte Oreilles Ojibwe College maintains the amount and date of each FWS payment to students for at minimum 3 years from the end of the award year of which the aid was awarded.
- (6) Second Federal Program (e.g., Federal Pell Grant Program)
- a. 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.
  - b. Eligibility for the Federal Pell Grant and the amount of the award is based on educational cost and enrollment status. Students must meet the eligibility requirements and submit a completed FAFSA for Federal Pell Grant consideration.
- (7) Third Federal Program (e.g., Iraq and Afghanistan Service Grant)
- a. 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.
  - b. 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.
  - c. 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.
  - d. Zero EFC treatment for children of soldiers:
  - e. LCOOC must use an EFC of 0 to package all federal student aid if the student meeting the above criteria has a Pell-eligible EFC. (Note that the zero EFC is only used for packaging purposes; we do not actually change the student's calculated EFC.)
  - f. When submitting an origination to COD for a student of this type, we include the CPS transaction containing the Department of Defense Match Flag set to "Y," or the award will not be accepted.
  - g. A student with an EFC that is not Pell eligible is potentially eligible to receive an award under the Iraq & Afghanistan Service Grant program.
- (8) Iraq & Afghanistan Service Grant program:
- a. 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.

- b. Due to the sequester, all Iraq & Afghanistan Service Grant award amounts first disbursed on or after October 1, 2014 and before October 1, 2015 must be reduced by 7.3%. For example, a student otherwise eligible for a Grant of \$6,095 (the maximum Scheduled Award for 2018-19) the grant would be reduced by \$444.94 resulting in a grant of \$5,650.06.
- c. When submitting an origination to COD for a student receiving an Iraq and Afghanistan Service Grant, we include the CPS transaction containing the DoD Match Flag set to "Y," or the award will not be accepted. The award may not exceed the student's cost of attendance. Iraq and Afghanistan Service Grants are not considered Estimated Financial Assistance for packaging purposes.

(9) Fourth Federal Program (e.g., Federal Supplemental Educational Opportunity Grant Program)

- a. Policies
  - i. The FSEOG Program provides need-based grants to help low-income undergraduate students finance the costs of postsecondary education.
  - ii. When making FSEOG awards, LCOOC must give priority to those students with "exceptional need" (those with the lowest Expected Family Contributions, or EFCs) and those who are also Federal Pell Grant recipients. Once the priority students are awarded and funding is still available, LCOOC can award to those students with a higher EFC, and to those who are not Pell eligible.
- b. Selection of Recipients
  - i. Student must be enrolled at least half-time (minimum 6 credits)
  - ii. Meet SAP requirements
  - iii. First selection group:
- c. Must be students who have the lowest expected family contributions (EFC) who will also receive a Pell Grant.
- d. 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.

(10) Second selection group:

- a. If there are any funds left over after the first selection group, LCOOC will award those students with the lowest EFCs who are not receiving a Pell Grant.
- b. This group also includes students who have exceeded their LEU.
- c. Procedure
  - i. The FSEOG report is ran from the PowerFAIDS Report Writer. This report pulls all students who are eligible for FSEOG funding. The report is then imported into Excel to sort rows regarding lowest EFC's and highest unmet needs. The maximum FSEOG award was \$324 per full time semester and is prorated on enrollment during the 2020-2021 School year.

The minimum award was \$100 per term during the 2020-2021 School year. Award amounts can vary year to year depending on number of students who qualify for FSEOG and the amount allocated by the Department of Education.

- (11) Fifth Federal Program (e.g., Teacher Education Assistance for College and Higher Education Grant Program)
- (12) Sixth Federal Program (e.g., Federal Perkins Loan Program)
  - a. LCOOC has elected to not provide Student Loans to its students.
- (13) Seventh Federal Program (e.g., Federal Direct Student Loan Program)
  - a. LCOOC has elected to not provide Student Loans to its students.

**§ 12.417 State Aid Programs.**

- (1) Wisconsin Grant
  - a. Eligibility for the Wisconsin Grant (WG) is determined by the Wisconsin Higher Educational Aids Board (HEAB) and is based on financial need. This grant is available to Wisconsin residents enrolled at least half-time. Eligibility cannot exceed 10 semesters. Students delinquent on child support payments may not be eligible for the WG Program until payment is made in full and the child support agency clears your account with HEAB.
- (2) Talent Incentive Program (TIP) grant
  - a. Provides grant assistance to the most financially needy and educationally disadvantaged students. First-time freshman students are nominated for the TIP Grant by the LCOOC Financial Aid Office or by counselors of the Wisconsin Educational Opportunities Program (WEOP). To receive the TIP Grant, a student must be a Wisconsin resident and enrolled at least half-time each consecutive term. Eligibility cannot exceed 10 semesters. Funding for the TIP Grant is provided by the State of Wisconsin and the U.S. Department of Education. These funds are limited and offered on a first-come, first-served basis.
- (3) Wisconsin Indian Student Assistance Grant (WIG)
  - a. WIG funds are made to undergraduate or graduate Wisconsin residents who are recognized as Wisconsin tribal members and enrolled at least half-time. Offers are based on financial need with a limit of 10 semesters of eligibility. Students must complete an Indian Scholarship Application form (available from the student's tribe) to receive this grant.
- (4) Bureau of Indian Affairs (BIA) Grant
  - a. Grants for Native American students are available through the Bureau of Indian Affairs. The grant amount is based on financial need. Financial aid application procedures, as previously outlined, must be followed in determining financial

need. In addition, a student must complete a separate Indian Scholarship Application for the purpose of certification by the Bureau of Indian Affairs as to the degree of Indian blood. Indian scholarship application forms are available from your tribe.

**§ 12.418      Institutional Aid Programs.**

**§ 12.419      Other Aid Programs.**

**SUBCHAPTER 12.18 - AUDITS**

**§ 12.181      Type of Audit.**

- (1) The institution as a whole participates in a yearly audit that is conducted by an outside audit firm. This audit pertains to the compliance audit for SFA purposes along with the Financial Statement Audit. These audits 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 current auditing firm that LCOOC uses is CliftonLarsonAllen (CLA).
- (2) The Business Office Staff and Financial Aid Staff are responsible for making program and fiscal records, as well as individual student records, available to the auditors. Both the financial aid and business offices are aware of the dates the auditors will be at the school, and make sure that someone is on hand to provide requested documents and answer questions during that period.
- (3) At the end of the on-site review, the auditor conducts an exit interview. At a school, this exit interview is usually conducted with the personnel from the school's financial aid and other relevant offices. The exit interview is not only an opportunity for the auditor to suggest improvements in procedures, but it also gives LCOOC the chance to discuss the draft report and review any discrepancies cited in the report. The final report is prepared by the auditor and submitted to the school or servicer.

**§ 12.182      Audit Submission Schedule.**

RESERVED

**§ 12.183      Internal Audit Requirements.**


- (1) In addition to the required audits mentioned above, LCOOC's financial aid staff also conduct an audit of all student files whom received financial aid during the award year. Each file is reviewed to ensure all materials and data is resolved to ensure accuracy in packaging.

**Chapter 12**  
**Financial Aid Policies and Procedures for the Lac Courte Oreilles Ojibwe College**

Date approved: 9/17/21

Review date: September 2022

Signature

 \_\_\_\_\_ President

 \_\_\_\_\_ Board Chair