

# Northern Technical College

## **Policy & Procedure Manual**

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## **GENERAL ADMINISTRATIVE REQUIREMENT**

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

## **ADMINISTRATIVE ORGANIZATION AND OFFICE MANAGEMENT**

### **Introduction to the Financial Aid Office**

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

### **Purpose & Philosophy of the Financial Aid Office**

The Mission of Northern Technical College is to excel in presenting educational knowledge, practical and technical skills and services in a professional manner, in an enjoyable atmosphere, and with tuition that is feasible for our students. Our endeavor is to cultivate our skills and services to ensure our students not only qualify for licensure, but also to facilitate graduates in embarking on a successful career in the industry.

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

### **Financial Aid Office Structure & Position Responsibilities**

The Admission & Financial Aid Administrator is responsible for administering all Title IV awards including awarding, cancellation, Exit Counseling and return of funds (Business Office). The Director/Business Office completes all regulatory reporting.

The Financial Aid Administrator and staff members counsel, package, complete verification process and resolve "C" code comments concerning FAFSA. They coordinate and consult with Freedom-the third-party service provider for processing of all Title IV Financial Aid.

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

## **Financial Aid Office Administration**

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

### **Monday – Friday**

9:00 a.m.- 4:00 p.m.

### **Telephone:**

**(870) 329-5136**

**E-Mail address:** [travena.jefferson@northerntechnicalcollege.net](mailto:travena.jefferson@northerntechnicalcollege.net)

**Website:** [northerntechnicalcolleges.com](http://northerntechnicalcolleges.com)

The staff in the Office of Financial Aid at Northern Technical College is dedicated to assisting students and their families and opening the doors for them to a quality private education. The Financial Aid Office has a sufficient number of qualified persons to administer the Title IV programs.

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

More than 50% percent of Northern Technical College's students are taking advantage of different payment options, or participate in the parent loan program.

## **Policies & Procedures Development Responsibilities**

The Director is ultimately responsible to develop policies and procedures and their periodic reviews and updates.

The Director and the Admission & Financial Administrator are responsible for ensuring others are aware of any changes to existing policies and procedures or the development of new ones. Generally, updates are made as the federal and state regulations changes, otherwise every year policies and procedures are reviewed and notified to all concerned via email and inter-office memorandum. This policies and procedures manual is available online in the institution's official website. The web address is [www.northerntechnicalcolleges.com](http://www.northerntechnicalcolleges.com).

The Admission & Financial Aid Administrator frequently checks Department of Education's Information for Financial Aid Professionals (IFAP) website as it is a Title IV requirement for schools to have access to the IFAP website. Although it is not a requirement that school subscribe IFAP's subscription service notifies its financial aid professionals via e-mail of new and timely statutory and/or regulatory changes. Also, Fame's Monthly Newsletter/emails is used to our school abreast of new regulations, laws, and Department of Education policy guidance. The school's binder from meetings and trainings minutes are also used as guides for new policies and procedures.

## Administrative Organization & Office Management

Various offices such as the financial aid office, admissions, business office work together in a cohesive manner to ensure compliance and a system of checks and balances with the Title IV programs and their regulations.

### Job Description for Key Positions:

#### Admissions & Financial Administrator

- Offer tour of Northern Technical College to prospective students
- Marketing and promoting of Northern Technical College
- Responsible for all Admissions and Enrollment requirements and processing
- Advise students with consumer information
- Provide students with consumer information
- Completing all compliance requirements for third party servicer
- Train to make sure the school is compliant with third party Client Interface Software
- Collect and review required documents needed to process Financial Aid eligibility with third party servicer
- Determine Financial Aid eligibility with third party servicer (Fame)
- Ensure all first time borrowers completed Direct Loan Entrance/Exit Counseling
- Monitor student's satisfactory academic progress (SAP)
- Monitor student's clock hours for future disbursements
- Keep current with all federal regulations and changes with Financial Aid process to ensure school is in compliance

#### Business Office Administrator

- Assist with PPA agreement between third party and process of creating G5, PELL, and Direct Loan accounts
- Maintain a system of student accounts that records charges, credits, and amounts due
- Collecting and disbursing any funds to students and/or Department of Education
- Reconcile accounts and maintain records to ensure a clear audit trail
- Ensure functions of authoring and disbursing Title IV funds remain separate
- Calculate return of Title IV funds (R2T4), if it applies to any students, with required time frame according to federal laws and regulations, and submitting calculations to business office
- Return of Title IV (R2T4), if it applies, and authorize post-withdrawal disbursements to students in required time frame according to federal laws and regulations
- Draw down and return Title IV funds to program accounts
- Establish and implement school's refund policy
- Reporting Title IV expenditures to the Department of Education in a timely manner
- Completing fiscal reports for federal funds and FISAP
- Maintain records consistent with Generally Accepted Accounting Principles (GAAP),

And government auditing standards

- Prepare and participate in Financial Students Aid program reviews and audits

#### Director

- Facilitate and implement policies and procedures of Northern Technical College
- Facilitate operations of school plan
- Conduct, and facilitate meetings and in-services for instructors

- Evaluate instructors and employees
- Perform SAP and Counsel students on Academics and Attendance
- Instruct students when needed
- Hire and conduct training for new hire.
- Implement and make sure Financial Aid Program is in compliance with federal guidelines
- Communicates with Fame, auditors, Financial Aid Administrator, and Business Office
- Keep abreast of new mandates and changes of Federal Financial Aid

### Instructor

- To instruct students effectively and prepare them for successful employment in Barbering
- Gain a working knowledge of the school's satisfactory academic progress policy, the standards of conduct, practical course requirement, grading policies and criteria, and state regulations
- Teach and follow the school's published curriculum, using all teaching aids and handouts provided unless deviations are approved.
- Maintain a thorough knowledge of the school's mission and educational objectives and strive to attain them at all times.
- Prepare for and participate in new student orientation according to school policy and as assigned.
- Organized and prepare for each class presentation.
- Follow and supplement published lesson plans.
- Maintain a thorough, accurate and current knowledge of the subject matter taught.
- Prepare practical and/or written assignments daily.
- Conduct practical evaluations and grade practical skills according to established grading criteria and record grades as required.
- Explain and clarify grading criteria as needed
- Properly prepare graduating students for the applicable state licensing examinations
- Monitor and fairly enforce the school's policies, standards of conduct and state regulations.
- Attend staff meetings scheduled and participate in discussion of all required agenda items.
- Provide employment assistance for graduating students as needed. Document placement efforts.
- Complete any administrative tasks as assigned in a timely and accurate manner.

### Separation of Duties

These various offices work independently as required by the regulatory agencies but in close coordination and report to CEO/Director of the school. The admission administrator is responsible for recruitment, admissions, registration and orientation of new students. The office of financial aid is responsible for processing FAFSA application, needs analysis, awarding and processing of all Title IV aids, institutional and outside grants and scholarships. The business office maintains all student records related to all payments including Title IV awards. The business office is responsible for maintaining individual student accounts and continuous update for the student ledger cards. The Director of the school is responsible for making sure the instructors record grades, monitoring and implementing attendance. The Director perform SAP and enforce attendance, leave of absence and satisfactory academic progress policies and procedures.



# Student Eligibility

## Student Eligibility

The Consumer Information page is intended to supplement the information provided in our schools' Campus Catalog and other publications. In many instances, the website indicates where additional information relating to the subject may be located, either in one of the schools' publications, on the school website, or on a third-party website (e.g., the College Navigator website maintained by the National Center for Education Statistics). This website also serves to notify current and prospective students regarding the availability and location of consumer information in accordance with certain state and federal laws applicable to our schools. For assistance with any of the consumer information discussed herein, prospective and current students may contact the Campus Director during normal business hours. A paper copy of consumer information disclosures and school publications are available on request.

# Admissions

## Admissions Policy

### General Admission Requirements:

Northern Technical College is an equal opportunity employer and follows the same policies in accepting applications from potential students. Northern Technical College is open to all students without regard to race, color, religion, national origin, gender disability, age, veteran status, or sexual orientation. The admission policy is a compliance with the Arkansas Barber Board, U.S. Department of Education, and National Council Accrediting Commission of Career Arts & Science.

All high school diplomas and GED's are verified by the admission's personnel to establish the validity of the document. Self-certification is not sufficient documentation and there no appeals process to if Northern Technical College is unable to validate or accept the high school diploma.

To be eligible for admission an applicant must be able to read and write English, and the student must meet the following requirements.

### Admission Process

- Tour the facility and attend an informal Interview. Parents and spouses are encouraged to attend.
- Diploma/ GED or Equivalent
- (2) 2x3 Passport Photos
- \$20.00 Money Order
- Drivers License or State ID
- Social Security Card

### Admission Requirements for Students with a High School Diploma:

- Proof of Age - Applicants who are not 18 years of age prior to their desired start date at the Northern Technical College may apply at the age of 17 with parental permission.
- Students must also be able to provide proof of appropriate educational requirement such as;
  - 1) **High school diploma**
  - 2) **Homeschooling**  
Though homeschooled students are not considered to have a **high school diploma or equivalent**, the student can be eligible to receive FSA funds if their secondary school education was **in a homeschool that state law treats as a home or private school**. Some states issue a secondary school completion credential to homeschoolers. If this is the case in the state where the student was homeschooled, the student must obtain this credential to be eligible for FSA funds. The student can include in their homeschooling self-certification that they received this state credential.
  - 3) **Foreign High School diploma or transcript** - Note: The high school diploma or transcript requirement can also be from a foreign school if it is equivalent to a U.S. high school diploma; Documentation of proof of completion of secondary education from a foreign country must be **officially translated into English and officially certified as the equivalent of high school completion in the United States.**)
  - 4) **Recognized equivalents of a high school diploma**- The Department of Education recognizes several equivalents to a high school diploma:
    - A GED certificate;
    - A certificate or other **official completion** documentation demonstrating that the student has passed a state-authorized examination (such as the Test Assessing Secondary Completion (TASC) the High School Equivalency Test (Hi SET), or, in California, the California High School Proficiency Exam) that the state recognizes as the equivalent of a high school diploma (note that certificates of attendance and/or completion are **not** included in this qualifying category);
  - 5) **Ability to Benefit (ATB) Alternative**- Northern Technical College does not accept ATB at this time.

Ability to Benefit (ATB)- Note: Due to the passage of Consolidated Appropriations Act of 2012, students who do not have a high school diploma or equivalent and did not complete secondary school in a home-school setting can no longer gain eligibility for Title IV, HEA funds by passing an “ability-to-benefit” test.) However, Northern Technical College does not accept Ability to Benefit (ATB) students.

### Diploma mill definition - An entity that:

1. Charges someone a fee and requires him to complete little or no education or coursework to obtain a degree, diploma, or certificate that may be used to represent to the general public that he has completed a program of secondary or postsecondary education or training; and
2. Lacks accreditation by an agency or association that is recognized as an accrediting body for institutions of higher education by the Secretary (pursuant to Part H, Subpart 2 of Title IV) or a federal agency, state government.

### Ability-To-Benefit (ATB) Alternatives & Career Pathway

Programs Students may become eligible for Title IV aid through the ATB alternative in one of two ways. If a student first enrolled in an eligible postsecondary program prior to July 1, 2012, the student may enroll in any

eligible program and can become eligible through one of the ATB alternatives. However, if a student first enrolled in an eligible postsecondary program on or after July 1, 2012, the student may only become eligible through one of the ATB alternatives if the student is enrolled in an “eligible career pathway program.” See below for more details about eligible career pathway programs.

**The ATB alternatives include:**

- Passing an independently administered Department of Education approved ATB test (see chart at the end of this section).
- Completing at least 6 credit hours or 225 clock hours that are applicable toward a degree or certificate offered by the postsecondary institution.
- Completing a State process approved by the Secretary of Education. Note: To date, no State process has been submitted for the Secretary’s approval.

▼ **Eligible Career Pathway Programs.** An “eligible career pathway program” means a program that combines rigorous and high-quality education, training, and other services that—

1. Align with the skill needs of industries in the economy of the State or regional economy involved;
2. Prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937 (commonly known as the “National Apprenticeship Act”; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.);
3. Includes counseling to support an individual in achieving the individual’s education and career goals;
4. Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
5. Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
6. Enables an individual to attain a high school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and
7. Helps an individual enter or advance within a specific occupation or occupational cluster.

You are responsible for documenting that your career pathway ATB options & Career pathway programs Consolidated Appropriations Act of 2016 (Public Law 114-113) DCL GEN-12-09 DCL GEN-16-09 HEA Sec. 484(d) E-Announcement July 9, 2015 ATB tests 34 CFR Part 668 Subpart J (Sections 141–156) E-Announcement June 24, 2015 Revised ATB regulations were published in the Federal Register on Oct. 29, 2010. Guidance on implementation of requirements for tests in languages other than English was given in GEN11-08.

Consolidated Appropriations Act of 2016, On December 18, 2015, the President signed the Consolidated Appropriations Act of 2016, which included the following changes to ATB provisions: • A revised definition of an eligible career pathway program; and the elimination of the career pathway alternative Pell Grant disbursement schedules. A school’s eligible career pathway program must meet the revised definition in order for students who first enroll in that program during the 2016-17 award year to become eligible for Title IV aid using one of the ATB alternatives. For students who were previously eligible only for Limited Pell Grant awards, schools must now use the Federal Pell Grant Payment and Disbursement Schedules that are published in Dear Colleague Letter GEN-16-01 for the upcoming 2016-17 award year. Transition guidance for the remainder of the current award year will be provided in a forthcoming Dear Colleague Letter on IFAP.

Glossary-Acronyms CFR DCL program(s) meet each of the requirements described above. The Department does not require that you receive approvals or endorsements from a State or local workforce agency to fulfill these requirements, although that may be one way that you document your compliance.

Additional information regarding the requirements for eligible career pathway programs can be found in Dear Colleague Letter GEN-16-09 on IFAP.

▼ Eligibility of Other Students without a High School Diploma (Grandfathered Students). As discussed in Dear Colleague Letter GEN-12-09, students who were enrolled in an eligible program of study prior to July 1, 2012 may continue to establish Title IV eligibility in any eligible program under one of the ATB alternatives by using the following grandfathering test:

Question 1: Did the student attend an eligible program at any Title IV institution prior to July 1, 2012? If yes, the student may use any of the ATB alternatives (as described above) to become eligible for Title IV, HEA student assistance. If no, continue to Question 2.

Question 2: Did the student, prior to July 1, 2012, officially register at a Title IV institution, and is the student scheduled to attend an eligible program? If yes, the student may use any of the ATB alternatives (as described above) to become eligible for Title IV, HEA student assistance. If no, the student may not use the ATB alternatives to become eligible for Title IV, HEA student assistance, unless the student is enrolled in an eligible career pathway program.

For a student who qualifies to use one of the ATB alternatives through enrollment in an eligible program prior to July 1, 2012, you must document how the student qualifies to use one of the ATB alternatives. Such documentation could include documentation from NSLDS that shows a student's prior receipt of Title IV funds, or a transcript or other receipt that demonstrates enrollment in an eligible program.

Northern Technical College and the Arkansas Barber Board does not accept ATB.

## Application Process:

- Application for Admission Form: Each applicant must submit a completed application for admission form and the following attachments:
  - Proof of high school graduation (diploma, transcript) or
  - General Education Development (GED)
  - Current Driver's License or
  - State approved ID
  - Social Security Card
  - \$20 Application Fee
  - Passport Photos
- Personal Interview - Each applicant must attend a personal interview with an admission/ financial aid administrator. A telephone interview may be considered if the applicant's geographical location and ability to travel to the interview site is a hardship.

## Procedure

- **Responsibilities:**
  - **Admission/Financial Aid Administrator:**
    - Greets the prospective student
    - Allows them to complete the intake form
    - Obtains a copy of their SS card and Driver's license
  - **Admission Administrator**

- Conducts the entrance interview with information booklet
- Gives tour of facility
- Allows perspective student to fill out application
- **Financial Aid Administrator**
  - Discuss the process of FA or reviews the obtained ISSR
  - Reviews the Award letter
  - If the student is willing to enroll, FA administrator collects the necessary documents and has the student complete the required registration papers and complete the required paperwork for their aid
  - Collects payment for Registration and Entrance
- **Business Officer/Campus Director**
  - Gives student a receipt and makes copy of Receipt for Student Profile Folder.
- **Admission/ Financial Aid Administrators**
  - Provides new student with New Student Packet
  - Copy of enrollment agreement, and orientation dates
  - Remind student of documents to turn in
  - Set appointment date to turn in admission requirements

## Attendance Process

### Attendance Policy

#### Attendance and Absences

##### Attendance and Absence Policies

Attendance is one of the utmost importance in order to achieve success in the school and professional work environment. Students are expected to attend all classes scheduled by their instructor. A daily report is accurately kept on student attendance. To enable the school to fulfill its obligations, the following guidelines have been established.

Full-Time Students- Classes are scheduled Tuesday through Friday, between the hours of 9:00 a.m. and 7:00 p.m., with a one hours break for lunch, and Saturdays between the hours of 9:00 a.m. and 5:00 p.m., with a fifteen minute break.

Students are allowed a ten minute break in the morning and one in the afternoon while on school property, depending on the amount of clients at the school. Students are to be on the school property at all times, unless excused by a school authority.

Part-Time Students- Classes are scheduled Tuesday through Saturday, as per enrollment agreement, with a one hour lunch break for full days and a fifteen minute break for 1-5 hour days. Special schedules may be arranged for persons that are employed. Decisions are based on a case-by-case review with the school Director. Part-Time students must attend a minimum of 16.5 hours per week, but may carry a maximum of 29.5 hours per week.

If you are Part-Time due to working another job and are unemployed for a period of 30 days, you will be asked to change your status to Full-Time.

1. Barber Stylist Students (1500 hours) attending:

- a. Full-Time – 34 hours per week; usually completes the program in 11 months.
  - b. Full-Time – 30 hours per week; usually completes the program in 12.5 months.
  - c. Part-Time – 19.5 hours per week; usually completes the program in 18.5 months.
2. Teacher, Manager, Instructor (600 hours) attending:
    - a. Full-Time – 24 hours per week; usually completes the program in 6.5 months.
  2. Crossover Students (600 hours) attending:
    - a. Full-Time – 24 hours per week; usually completes the program in 6.5 months.

The above times may vary depending on holidays and attendance.

Student attendance is kept by an electronic time clock. All students are required to clock in and out daily. In addition, students are required to clock out for lunch. Failure to do so does not alter the fact that one hour of the student's day is allocated for lunch. Clocking in and out for another student is prohibited.

Students are permitted (5) tardy's and or (5) absences per attendance cycle. After the 5th tardy and or absence in each cycle the student will be processed a \$25 fee per tardy or absence thereafter, until the end of the cycle. Each cycle begins on the first day of each month and ends at the last day of the month. Exceptions are only given when approved by the School Director in writing or if the Student provides one of the following documents:

Doctor's Excuse

Obituary

When a student has clocked in for the day, they must notify their instructor if they plan to leave and come back during the day. Student are not allowed to leave without being on a standard break schedule (i.e.; 15-minute break or Lunch hour).

Students may request time off in advance for special events, but it must be approved by the School Director in writing. Student documents must be emailed to the school director or assistant director.

#### Saturday Attendance

All students are required to attend all day Saturday, unless written prior arrangements are made with a school official. Saturdays provide students the greatest learning experiences in becoming proficient in performing practical skills and gaining the vital people skills that are essential for dealing with the real world. Tardiness and unexcused absences on Saturday may be considered cause for possible interruption of training. **The school will issue a fine for any of the following:**

Students that arrived later than 9:15am and before 10:30 on a Saturday will be fined \$25.

Students that leave earlier than 3:30pm on a Saturday will be fined \$50.

Students that arrive after 10:30am and/or absent on Saturday will be fined \$100.

#### Excused/Unexcused Absences

An excused absence is one that is due to personal illness, illness or death in the immediate family, or an emergency situation. All excused absences due to a lengthy illness must be accompanied by an approved doctor's note. All school missed must be made up.

A student who misses fourteen consecutive days of scheduled class time, has had no direct or indirect contact with school officials during the period, and has not been granted an official leave of absence, may be terminated.

## Approved Leave of Absence

Students requesting a Leave of Absence (LOA) from the institution must submit a written request to the school's Director indicating the reason an LOA is being requested. The request must indicate a beginning and ending date and be signed and dated by the student. Students will be provided written approval or disapproval of the request, signed by a school official.

The school will grant a Leave of Absence request for no more than sixty days with a 12-month period. The school's Director reserves the right to approve a leave of absence beyond the 60 days on a case-by-case basis, depending upon the nature of the request. In the event of unforeseen circumstances, such as medical reasons, which affect the student or a member of the student's immediate family, military service requirement or jury duty, the student may be granted a leave of absence, even if he/she has taken a prior leave of absence. In no case will combined leaves of absence exceed 180 days within the 12 month period.

A student on leave of absence will incur no additional chargers by the school. If a student is not back in class the day after the expiration date of a leave of absence, immediate termination may occur. Students beginning an approved leave of absence with Satisfactory Progress status will return Satisfactory Progress provided he/she complies with the terms of leave of absence, students beginning a leave of absence with an unsatisfactory progress status will return in unsatisfactory progress status. Student failing to return from a leave of absence as scheduled are not considered in satisfactory progress and must re-established satisfactory progress status according to the school's satisfactory progress policy. A copy of the leave of absence request will be maintained in the student's file.

Students failing to complete his/her program within the terms of the contract will be assessed a fee of \$250 per week for each week beyond the scheduled completion date.

## [Tardy Policy](#)

If you are going to be tardy and/or absent, in keeping with good business practices, you must send an email to the school director to notify of your absence or speak with school official regarding being tardy. A student is considered tardy if he/she is not ready for class within fifteen minutes of their scheduled time. Excessive tardiness and absenteeism may be cause for suspension and/or dismissal. The school will issue a fine of \$25.00 per occurrence for any tardy in excess of five per month.

## Procedure

- **Responsibilities:**
  - **Admission/Financial Aid Administrator**
    - Orientates students on how to clock in and out on orientation day
    - Monitor's daily attendance to ensure student maintaining satisfactory academic progress
  - **Instructor**
    - Monitor's daily attendance
    - Attempts to contact student during absences
    - Alerts the Campus Director of students who are approaching 10 or 14 due absences.
  - **Financial Aid Administrator**
    - Updates the student's time in the event of errors student's attendance due to technical issues, holidays, weather, or students who forgot to clock in or out.
  - **Campus Director**
    - Attempts to contact students who has continuous absences

- Meet with students who are continuously tardy
- Populate withdrawal letters for students who fail to follow the attendance policy.

## TRANSFER STUDENTS

### Policy

Enrollment is available for students wishing to transfer to Northern Technical College after they have withdrawn from other barber schools both in and out of state. The school does not recruit students already attending or admitted to another school offering similar programs of study. The student must submit certification of hours prior to signing the enrollment agreement. Credit for previous training and education in licensed barber training programs may be granted. The acceptance of transfer hours is at the discretion of the School and there is a possibility that no such credit will be granted. Note: All hours attempted will count toward the Title IV, HEA funding 150% quantitative requirements not just the hours that were accepted as transfer hours.

The student must meet all regular entrance and registration requirements. A transferring barber student may be required to enroll for a minimum of 500 hours and a transferring Teacher, Manager, Instructor student may be required to enroll for a minimum of 300 hours. Before a transferring or returning student can be enrolled, they will be evaluated according to the Satisfactory Academic Progress policy (see policy listed in the school catalog on page 17). Students accepted for admission may be required to purchase the school's current kit. Students applying for re-entry or transfer-in from other schools may be required, as a condition of enrollment, to bring delinquent prior student loans to a current status.

### Procedure

#### Step 1

Visit Northern Technical College for verification that you have met the criteria for admission.

#### Step 2

Set up your appointment with the Administrator for an interview. We ask that you submit the following documents to be considered for acceptance:

- Proof of high school graduation (diploma, transcript) or
- General Education Development (GED)
- Current Driver's License or
- State approved ID
- Social Security Card
- \$20 Application Fee
- Passport Photos



### Step 3

After all documents have been received and reviewed for completeness, you will be contacted of acceptance. You are now ready for enrollment. At this appointment, you will attend orientation, sign your enrollment agreement, and submit the following fees:

Administrative Fee	\$145.00 (non- refundable)
Book and Kit	\$2,000.00 *Prices may vary
Tuition Cost	\$17,995.00

## Satisfactory Academic Progress SAP

### SAP Policy

#### Satisfactory Academic Progress (SAP)

All students (cash and Title IV aid) attending Northern Technical College, (hereinafter known as “Northern Technical College”) must maintain Satisfactory Academic Progress (SAP).

- This policy complies with the guidelines established by the National Accrediting Commission of Career Arts and Sciences and the federal regulations established by the United States Department of Education.
- The SAP Policy is given to all students prior to signing the enrollment agreement and is applied with consistency, regardless of part time / full time status.
- SAP is defined as reaching each checkpoint of training with a cumulative 75% theory and practical grade average, as well as attended a minimum of 67% of the scheduled hours at their designated checkpoints.
- Students who meet these requirements are considered to be making SAP until the next scheduled evaluation.
- 75% equates to 150% maximum time frame for completion of the program.
- Maximum time frame in hours to complete divided by the hours in the program=150%
- Example: 1500 hour program times 150%=2250 maximum hours to complete. 2250 hours divided by 1500 hours=150%
- The maximum time frame for each student is monitored by the Financial Aid Administrator to ensure each student is within the allowable guidelines to complete the program within 150% of the scheduled attendance. Students who are behind in attendance are counseled regarding consequences of failure to meet maximum time frame necessary in order to graduate. Consequences resulting from failure to complete within the maximum time frame include dismissal as soon as the Financial Aid Administrator becomes aware of the student's inability to complete within the maximum time frame.
- All students will be notified of any evaluation that impacts the student's eligibility for financial aid, if applicable, through means of their Report Card, which is signed at each checkpoint of training.
- A copy is given to the student and one placed in their permanent student records file.
- If at any time new/ conflicting information is made available that affects the student's SAP, Northern Technical College will go back and re-evaluate SAP for the payment period in question.
- If the newly presented information changes the student's SAP level from satisfactory to unsatisfactory or from unsatisfactory to satisfactory, adjustments will be made to any affected Title IV aid pending the results of the newly found conflicting information.

### SAP Procedures

- **Responsibilities:**
  - **Instructor**
    - Provide the student with instructional materials that challenge their knowledge on course objectives, theory, skill, and concepts
    - Provide the student with practical and application exams challenge their knowledge on course objectives, theory, skill, and concepts
    - Document grades in individual paper grade book and/or electronic grade
    - Review progress monthly reports with students.
    - Have students sign and instructor sign progress report- return to student files.
    - Alert Campus Director of students who fall below the 70%
    - Place progress reports in instructor's mailbox
    - Place signed copies in the student's academic folders.
    - Make copies of Northern Technical College's progress reports for Financial Aid (FA) files- Place them in the Financial Aid Mailbox
  - **Financial Aid Administrator**
    - Place progress reports in Financial Aid folders and alert business office if student successfully meets requirements and is entering new pay period
  - **Campus Director**
    - Review the academic status of all students who fall below the 70%
    - Meet with each student who fall below the 70% recommending Probationary status
    - Alert Financial Aid of the student's status

## Financial Aid Warning

### Financial Aid Warning Policy

#### Title IV, HEA Financial Aid Warning

Students who fail to meet minimum requirements (67% cumulative attendance and a C or 70% GPA) for attendance and academic progress at the end of a payment period will be placed on a Financial Aid Warning the first time. Any student on Financial Aid Warning may continue to receive assistance under the Title IV, HEA programs for one payment period only.

At the end of that payment period if the student has met the minimum grade and attendance requirement the student is considered to be meeting SAP.

If the student is not meeting SAP at the end of the Financial Aid Warning Period; there will be a loss of Title IV, HEA eligibility; with the right to appeal. The student will be placed on an Academic Development Status, with a loss of Title IV, HEA funding and will be required to meet specific criteria of an improvement plan to assist them in regaining SAP and Title IV, HEA eligibility.

During this period the students will not be eligible to receive Title IV, HEA funds but he/she may continue on a cash pay basis with an approved payment plan. Arrangements for payment must be approved within 10 school days of notification of development status.

## Financial Aid Warning Procedure

- **Responsibilities:**
  - **Campus Director**
    - Will alert the Financial Aid Administrator of student falling below SAP and Financial Aid Warning based on program progress and attendance at the end of the payment period.
    - Meet with the student to discuss the guidelines of the Financial Aid Warning status
    - Give a copy of guidelines of Financial Aid Warning to the student and a copy for Financial Aid file and to the Department of Education.
    - Monitor progress during the duration of the Financial Aid Warning as indicated.
  - **Financial Aid Administrator**
    - Place copy of the Warning in the Financial Aid file
  - **Instructor**
    - Monitor progress during the Financial Aid Warning

## Financial Aid Probation

### Financial Aid Probation Policy

#### Title IV, HEA Financial Aid Probation

For Title IV, HEA payments the student must meet both clock hours and weeks of instruction as well as complying with all standards for Satisfactory Academic Progress before they can receive further Title IV, HEA payments.

Title IV, HEA WARNING / DEVELOPMENT STATUS / APPEAL / PROBATION

Students who fail to meet minimum requirements (67% cumulative attendance and a C or 75% GPA) for attendance and academic progress at the end of a payment period will be placed on a Title IV, HEA Financial Aid Warning. Any student on Title IV, HEA Financial Aid Warning may continue to receive assistance under the Title IV HEA programs for one payment period. At the end of the payment period if the student has met the minimum grade and attendance requirement the student is considered to be meeting Satisfactory Academic Progress.

If the student is not meeting Satisfactory Academic Progress at the end of the Financial Aid Warning Period, that student will then lose Title IV, HEA eligibility. The student will be placed on a Financial Aid Suspension and will be required to meet specific criteria of an improvement plan to assist them in regaining SAP and Title IV, HEA eligibility. During this period the students will not be eligible to receive Title IV, HEA funds but he/she may continue on a cash pay basis with an approved payment plan. Arrangements for payment must be approved within 10 school days of notification of development status.

A student who loses their financial aid eligibility due to Title IV, HEA Financial Aid Suspension after a financial aid warning has the right to file an appeal regarding their Satisfactory Academic Progress Evaluations.

If the student is granted an appeal they will then be placed on Title IV, HEA Financial Aid Probation, which is a status assigned by the institution to a student who fails to make SAP, who has appealed and has had their Title IV eligibility for aid reinstated for one payment period.

## Financial Aid Probation Procedure

- **Responsibilities:**
  - **Campus Director**
    - During the Financial Aid (FA) Warning period, Director will monitor the progress of the student
    - Evaluate the student's progress at the end of the Financial Aid warning period
    - Failure to reinstate, will offer the student option to appeal, hence probation.
    - Proceed with appeals process
    - Alert Financial Aid Administrator of student status
    - Alert instructor of student status
    - Alert appeals committee of student's written appeal

# Appeals

## Policy and Procedure

### Appeal Process:

- If the student does not reach SAP by the checkpoint following Financial Aid Warning / Cash Payment Warning, the student will lose their Title IV, HEA funding, with the right to appeal.
  - A student who does not achieve the minimum standards is no longer eligible for Title IV, HEA program funds, if applicable, unless the student is on warning or has succeeded upon appeal of the determination that has resulted in the status of probation which reinstates the student's aid until the checkpoint following probation.
  - The student must provide documentation to substantiate the appeal and the appeal must include why the student was unable to meet SAP standards and what has changed that will allow the student to meet SAP standards by the next checkpoint.
    - Documentation examples may include, but not limited to: a doctor's note, documentation from a counselor, etc.
  - The student may continue to attend classes during the appeal process, however; if the student must withdraw due to loss of an appeal, the student's refund calculation will be based on the student's last day of attendance.
  - The length of the program limits the number of appeals.
  - No two appeals can be consecutive, as the student must regain SAP at the next checkpoint between appeals.
  - The student's aid eligibility will be reinstated after a successful appeal.
  - Appeal approval is acknowledging that because of documented unusual circumstances the student continues to be eligible for aid even though she/he fell below the standards.
  - No appeal will be allowed for any student who is ineligible to graduate due to lack of completion within the maximum time frames.
  - Appeals will be reviewed on a case-by-case basis.
  - Appeals may be granted for a student due to injury; illness; death of relative; family difficulties such as a divorce; financial difficulties; interpersonal problems; difficulty balancing work and family responsibilities and school; or a special circumstance beyond the student's control.

- An example of a mitigating circumstances beyond the student's control may be but not limited to: student living in an environment with a significant other who is abusive / controlling which has affected the student's attendance / ability to study.
- The owner / director, financial aid administrator and /or an educator will review the student's appeal and the owner/director will make the appeal determination within 5 business days of receipt of the appeal.
  - Northern Technical College staff will notify the student of the results of the appeal, as soon as possible, but no later than 5 business days following the decision of an appeal.
  - A portion of the successful appeal will include determining if the student will be able to meet cumulative SAP standards by the end of the subsequent payment period (evaluation period) and develop a plan to meet SAP before the end of the next payment period that, if followed, will result in the student achieving SAP by the following checkpoint.
  - If the student's appeal is accepted and the student fails to meet the outlined plan, the student immediately loses aid, even if prior to the next checkpoint.
  - The appeal decision and all appeal related documents will be placed in the student's file.
- If the student who is attempting to follow the outlined plan does not achieve cumulative minimum SAP by the checkpoint following Financial Aid Probation, the student will lose Title IV eligibility and can only continue if the student is attempting to comply with cumulative SAP standards and pays cash for their next payment period's tuition.
  - The student must take action that brings her/him into compliance with the qualitative and quantitative components of Northern Technical College's standards including maximum time frame to complete the program.
  - If the student achieves SAP by the checkpoint following financial aid ineligibility, the student may have their financial aid reinstated for the next payment period included in the student's training.

## Reestablishment of Status

A student determined NOT to be making Satisfactory Progress may establish Satisfactory Progress by:

- Making up missed tests and assignments and increasing grade average to 70% or better, and/or
- Increasing cumulative attendance to 67% or better by the end of a Warning or Probation period.

## Reinstatement of Financial Aid

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

## Appeal Procedure

- **Responsibilities:**
  - **Campus Director**
    - During the Financial Aid (FA) Warning period, Director will monitor the progress of the student
    - Evaluate the student's progress at the end of the Financial Aid warning period
    - Failure to reinstate, will offer the student option to appeal, hence probation.
    - Proceed with appeals process
    - Alert Financial Aid Administrator of student status
    - Alert instructor of student status
    - Alert appeals committee of student's written appeal

# Return to Title IV, HEA Funds (R2T4)

## Return to Title IV Policy

### Return to Title IV Funds Policy Title IV Eligible Program

This policy applies to students' who **withdraw official, unofficially or fail to return from a leave of absence or dismissed from enrollment** at Northern Technical College. It is separate and distinct from Northern Technical College refund policy. (Refer to Institutional Refund Policy for both withdrawn and dismissed students)

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

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

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

The institution has **45** days from the date that the institution determines that the student withdrew to return all unearned funds for which it is responsible. The school is required to notify the student if they owe a repayment via written notice. The school must advise the student or parent that they have **14** calendar days from the date that the school sent the notification to accept a post withdraw disbursement. If a response is not received from the student or parent within the allowed time frame or the student declines the funds, the school will return any earned funds that the school is holding to the Title IV, HEA programs.

## Return to Title IV Procedure

- **Responsibilities:**
  - **Campus Director**
    - Process the withdrawal according guidelines.
    - Have student sign withdrawal forms if available or mail them if student is not available to sign.
    - Alert Financial Aid to the student's DOD, and LDA

- Print an updated sign in sheet for Financial Aid and Department of Education file.
- Alert instructors of the withdrawal and for final grades.
- **Business Office**
  - School alerts third party of withdrawal and/or termination. FAME (third party) calculate the R2T4 and compares with school calculation
  - Submits notification to the Third-party servicer of request to return monies owed based on R2T4 calculations in writing.
  - Submits return within 45 days of the withdrawal
  - Submits notification to the student the amount of return monies based on R2T4 calculations in writing.
  - Ensure monies returned is in the proper account for retrieval
  - Print updated Student Ledger Sheet for Educational Department and Financial Aid files.
- **Financial Aid Administrator**
  - Place updated copies in the Financial Aid folder (student ledger, sign in sheet, withdrawal letters, notices, etc.)
  - Transfers file from active the non-active
  - Files the folder to the non-active file.

## Official Withdrawal

### Official Withdrawal Policy

#### “Official” Withdrawal from the School

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

1. Date student provided official notification of intent to withdraw, in writing or orally.
2. The date the student began the withdrawal from Northern Technical College, records. A student is allowed to rescind his notification in writing and continue the program. If the student subsequently drops, the student’s withdrawal date is the original date of notification of intent to withdraw.

#### Official Withdrawal Procedure

- **Responsibilities:**
  - **School Director and/or Business Administrator**
    - Complete the and school drop form
    - Complete the Financial Aid Return to Title IV worksheet
    - Complete Institution’s withdrawal form
  - **Instructor**
    - Update the student’s final grades
    - Complete student exit form

- Have student sign withdrawal forms if available or mail them if student is not available to sign.
- Alert Financial Aid Administrator and Business Administrator
- Print an updated sign in sheet for Financial Aid and Education Department file.
- Alert instructors of the withdrawal and for final grades.
- **Campus Director/ Business Administrator**
  - Process the withdrawal according to guidelines for Institution and Title IV.
  - Have student sign withdrawal forms if available or mail them if student is not available to sign.
  - Alert Financial Aid to the student's DOD, and LDA
  - Print an updated sign in sheet for Financial Aid and Education Department file.
  - Alert instructors of the withdrawal and for final grades.
- **Business Office**
  - Alerts the third-party server (FAME) of withdrawal and/or termination.
  - Third Party (FAME) will calculate R2T4 and compare with school's calculations.
  - Submits notification to the Third-party servicer of request to return monies owed based on R2T4 calculations in writing.
  - Submits return within 45 days of the withdrawal
  - Submits notification to the student the amount of return monies based on R2T4 calculations in writing.
  - Ensure monies returned is in the proper account for retrieval
  - Print updated Student Ledger Sheet of the R2T4 for Ed and FA files.
  - Supply the student with a final Student Ledger Sheet
- **Financial Aid Administrator**
  - Financial Aid Exit Interview
  - Place updated copies in the Financial Aid folder (student ledger, sign in sheet, withdrawal letters, notices, etc.)
  - Will provide a letter or document of the process for the Return to Title IV process.
  - Transfers file from active the non-active
  - Files the folder to the non-active file.

Upon receipt of the official withdrawal information, Northern Technical College will complete the following:

1. Determine the student's last date of attendance as of the last recorded date of academic attendance on the school's attendance record;
2. Two calculations are performed:
  - a. The student's ledger card and attendance record are reviewed to determine the calculation of Return of Title IV, HEA funds the student has earned, and if any, the amount of Title IV funds for which the school is responsible. Returns made to the Federal Funds Account are calculated using the Department's Return of Title IV, HEA Funds Worksheets, scheduled attendance and are based upon the payment period.
  - b. Calculate the school's refund requirement (see school refund calculation):
3. The student's grade record will be updated to reflect his/her final grade.
4. Northern Technical College will return the amount for any unearned portion of the Title IV funds for which the school is responsible within 45 days of the date the official notice was provided.
5. The school will provide the student with a letter explaining the Title IV, HEA requirements:



- a) The amount of Title IV assistance the student has earned. This amount is based upon the length of time the student was enrolled in the program based on scheduled attendance and the amount of funds the student received.
  - b) Any returns that will be made to the Title IV, HEA Federal program on the student's behalf as a result of exiting the program. If a student's scheduled attendance is more than 60% of the payment period, he/she is considered to have earned 100% of the Federal funds received for the payment period. In this case, no funds need to be returned to the Federal funds.
  - c) Advise the student of the amount of unearned Federal funds and tuition and fees that the student must return, if applicable.
6. Supply the student with ledger card record noting outstanding balance due to the school and the available methods of payment. A copy of the completed worksheet, check, letter and final ledger card will be kept in the student's file.

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

## Unofficial Withdrawal

### Unofficial Withdrawal Policy

#### Unofficial Withdrawal from School

In the event that the school unofficially withdraws a student from school, the School Director and/or Business Administrator must complete the Withdrawal Form using the last date of attendance as the drop date.

Any student that does not provide official notification of his or her intent to withdraw and is absent for more than 14 consecutive calendar days, will be subject to termination and considered to have unofficially withdrawn.

Within one week of the student's last date of academic attendance, the following procedures will take place:

1. The Financial Aid Administrator and/or School Director will make three attempts to notify the student regarding his/her enrollment status;
2. Determine and record the student's last date of attendance as the last recorded date of academic attendance on the attendance record;
3. The student's withdrawal date is determined as the date the day after 14 consecutive calendar days of absence;
4. Notify the student in writing of their failure to contact the school and attendance status resulting in the current termination of enrollment;
5. Northern Technical College calculates the amount of Federal funds the student has earned, and, if any, the amount of Federal funds for which the school is responsible.
6. Calculate the school's refund requirement (see school refund calculation);
7. Northern Technical College, Business Administrator will return to the Federal fund programs any

unearned portion of Title IV funds for which the school is responsible within 45 days of the date the withdrawal determination was made and note return on the student's ledger card.

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

### Withdraw Before 60%

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

### Withdraw After 60%

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

Northern Technical College, measures progress in Clock Hours, and uses the payment period for the period of calculation.

### The Calculation Formula:

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

Calculate the percentage of Title IV, HEA aid earned:

- a) Divide the number of clock hours scheduled to be completed in the payment period as of the last date of attendance in the payment period by the total clock hours in the payment period.

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

- b) If this percentage is greater than 60%, the student earns 100%.
- c) If this percent is less than or equal to 60%, proceeds with calculation.  
Percentage earned from (multiplied by) Total aid disbursed, or could have been disbursed  
= AMOUNT STUDENT EARNED.

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

100% minus percent earned = UNEARNED PERCENT

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

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

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

1. Repay the overpayment in full to Northern Technical College or Sign a repayment agreement with the U.S. Department of Education.

### Order of Return

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

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

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

### Earned AID:

Title IV, HEA aid is earned in a prorated manner on a per diem basis (calendar days or clock hours) up to the 60% point in the semester. Title IV, HEA aid is viewed as 100% earned after that point in time. A copy of the worksheet used for this calculation can be requested from the Financial Aid Administrator and/or Business Administrator's office.

### Unofficial Withdrawal Procedure

- **Responsibilities:**
  - **Instructor**
    - Update the student's final grades in the gradebooks
    - Complete student exit form
    - Have student sign withdrawal forms if available or mail them if student is not available to sign.
    - Alert Financial Aid to the student's DOD, and LDA
    - Print an updated sign in sheet for FA and ED file.
    - Alert instructors of the withdrawal and for final grades.
  - **Campus Director/Business Administrator**
    - Process the withdrawal according guidelines.
    - Complete withdrawals forms if available or mail them if student is not available to sign.
    - Alert FA to the student's DOD, and LDA
    - Print an updated sign in sheet for FA and ED file.
    - Alert instructors of the withdrawal and for final grades.
  - **Business Administrator**
    - Alert FAME (third party) of student withdrawal and/or termination. FAME will calculate the R2T4 worksheet and compare to school's calculation.
    - Submits notification to the Third-party servicer of request to return monies owed based on R2T4 calculations in writing.
    - Submits return within 45 days of the withdrawal
    - Submits notification to the student the amount of return monies based on R2T4 calculations in writing.
    - Print updated Student Ledger Sheet of the R2T4 for Ed and FA files.
    - Supply the student with a final Student Ledger Sheet
  - **Financial Aid Administrator**
    - Contact student via mail or phone to complete Exit Interview
    - Place updated copies in the Financial Aid folder (student ledger, sign in sheet, withdrawal letters, notices, etc.)
    - Will provide a letter or document of the process for the Return to Title IV process via mail
    - Transfers file from active the non-active
    - Files the folder to the non-active file.

## Post Withdrawal Disbursements

### Post Withdrawal Policy

#### Post Withdraw

If you did not receive all of the funds that you have earned, you may be due a post-withdrawal disbursement. Northern Technical College may use a portion or all of your post- withdrawal disbursement for tuition and fees (as contracted with Northern Technical College).

The institution will offer any post-withdrawal disbursement of loan funds within 30 days of the date it determines the student withdrew.

The institution must disburse any Title IV, HEA grant funds a student is due as part of a post-withdrawal disbursement within 45 days of the date the school determined the student withdrew and disburse any loan funds a student accepts within 180 days of that date.

For all other school charges, Northern Technical College needs your permission to use the post-withdrawal disbursement. If you do not give permission, you will be offered the funds. However, it may be in your best interest to allow the school to keep the funds to reduce your debt at the school.

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

## Post Withdrawal Disbursement Procedure

- **Responsibilities:**
  - **FA Officer**
    - Students will sign a document during the enrollment process stating whether they would like post-withdrawal disbursements monies to be used to satisfy fees that may have occurred during their enrollment.
    - Place the signed form in their Financial Aid folder

# Refund- Institutional

## Institutional Refund Policy

### Institutional Refund Policy (For both Withdrawn and Dismissed Students) Non-Title IV Eligible Programs

#### Refund Policy (For both Withdrawn and Dismissed Students) Non-Title IV Eligible Programs

Three – Business Day Cancellation.

If the student for any reason does not enter, all monies paid excluding application fees and registration fees will be refunded if requested within three business days after signing an enrollment agreement and making an initial payment.

For applicants who cancel enrollment or students who withdraw from enrollment a fair and equitable settlement will apply. The following policy will apply to all terminations for any reason, by either party, including student decision, course or program cancellation, or school closure.

Any monies due the applicant or students shall be refunded within 45 days of official cancellation or withdrawal. Official cancellation or withdrawal shall occur on the earlier of the dates that:

- 1 An applicant is not accepted by the school. The applicant shall be entitled to a refund of all monies paid.
- 2 A student (or legal guardian) cancels his/her enrollment in writing within three business days of signing the enrollment agreement. In this case all monies collected by the school shall be refunded, regardless of whether or not the student has actually started classes.

- 3 A student cancels his/her enrollment after three business days of signing the contract but prior to starting classes. In these cases, he/she shall be entitled to a refund of all monies paid to the school less the registration fee in the amount of \$100.
  - 4 A student notifies the institution of his/her withdrawal in writing.
  - 5 A student on an approved leave of absence notifies the school that he/she will not be returning. The date of withdrawal shall be the earlier of the date of expiration of the leave of absence or the date the student notifies the institution that the student will not be returning.
  - 6 A student is expelled by the school. (Unofficial withdrawals will be determined by the institution by monitoring attendance at least every 30 days.)
  - 7 In type 2, 3, 4 or 5, official cancellations or withdrawals, the cancellation date will be determined by the postmark on the written notification, or the date said notification is delivered to the school administrator or owner in person.
- For students who enroll and begin classes but withdraw prior to course completion (after three business days of signing the contract), the following schedule of tuition earned by the school applies. All refunds are based on schedule hours:

<b>PERCENT OF SCHEDULED TIME ENROLLED TO TOTAL COURSE/PROGRAM</b>	<b>TOTAL TUITION SCHOOL SHALL RECEIVE/RETAIN</b>
0.01% to 04.9%	20%
5% to 09.9%	30%
10% to 14.9%	40%
15% to 24.9%	45%
25% to 49.9%	70%
50% and over	100%

- All refunds will be calculated based on the students last date of attendance. Any monies due a student who withdraws shall be refunded within 45 days of a determination that a student has withdrawn, whether officially or unofficially. In the case of disabling illness or injury, death in the student's immediate family or other documented mitigating circumstances, a reasonable and fair refund settlement will be made. If permanently closed or no longer offering instruction after a student has enrolled, the school will provide a pro rata refund of tuition to the student OR provide course completion through a prearranged teach out agreement with another institution. If the course is canceled subsequent to a student's enrollment, the school will either provide a full refund of all monies paid or completion of the course at a later time. If the course is cancelled after students have enrolled and instruction has begun, the school shall provide a pro rata refund for all students transferring to another school based on the hours accepted by the receiving school OR provide completion of the course OR participate in a Teach-Out Agreement OR provide a full refund of all monies paid
- Students who withdraw or terminate prior to course completion are charged a cancellation or administrative fee of \$150.00. This refund policy applies to tuition and fees charged in the enrollment agreement. Other miscellaneous charges the student may have incurred at the institution (EG: extra kit materials, books, products, unreturned school property, etc.) will be calculated separately at the time of withdrawal. All fees are identified in the catalog and in this enrollment agreement.
- Students who withdraw or terminate prior to course completion will also be required to pay the institution the amount of unmet charges the institution has to Return to Title IV and will be calculated separately at the time of withdrawal.

## Institutional Refund Procedure

- **Policy:** See above refund institutional policy
- **Purpose:** To ensure students are awarded refunds based on the policy of the institution.
- **Responsibilities:**
  - **Admission Administrator**
    - Alerts the business office that the prospective student chooses not to enroll within the timeframe of the 3 days allotted
  - **Business Office**
    - Will refund the amount paid within to the prospective student
    - Notify the student in writing the amount of the refund
    - Document refund on the student ledger
    - Refund amount to student
    - Monies owed to the school is calculated on a withdrawal form based on actual hours spent in the classroom. (see above policy)

# High School Diploma Verification

## High School Diploma Verification Procedure

### Admission Requirements for Students with a High School Diploma:

Proof of Age - Applicants who are not 18 years of age prior to their desired start date at the Northern Technical College may apply at the age of 17 with parental permission.

Students must also be able to provide proof of appropriate educational requirement such as;

#### 1) High school diploma

#### 2) Homeschooling

Though homeschooled students are not considered to have a **high school diploma or equivalent**, the student can be eligible to receive FSA funds if their secondary school education was **in a homeschool that state law treats as a home or private school**. Some states issue a secondary school completion credential to homeschoolers. If this is the case in the state where the student was homeschooled, the student must obtain this credential to be eligible for FSA funds. The student can include in their homeschooling self-certification that they received this state credential.

- #### 3) Foreign High School diploma or transcript
- Note: The high school diploma or transcript requirement can also be from a foreign school if it is equivalent to a U.S. high school diploma; Documentation of proof of completion of secondary education from a foreign country must be

**officially translated into English and officially certified as the equivalent of high school completion in the United States.)**

- 4) **Recognized equivalents of a high school diploma-** The Department of Education recognizes several equivalents to a high school diploma:
- A GED certificate;

A certificate or other **official completion** documentation demonstrating that the student has passed a state-authorized examination (such as the Test Assessing Secondary Completion (TASC) the High School Equivalency Test (HiSET), or, in California, the California High School Proficiency Exam) that the state recognizes as the equivalent of a high school diploma (note that certificates of attendance and/or completion are **not** included in this qualifying category);

### Diploma mill definition - An entity that:

1. Charges someone a fee and requires him to complete little or no education or coursework to obtain a degree, diploma, or certificate that may be used to represent to the public that he has completed a program of secondary or postsecondary education or training; and
2. Lacks accreditation by an agency or association that is recognized as an accrediting body for institutions of higher education by the Secretary (pursuant to Part H, Subpart 2 of Title IV) or a federal agency, state government.

### High School Diploma Verification Procedure

- **Responsibilities: To ensure admission process is carried out.**
  - **Admission Administration**
    - Verify all High School Diploma by using the LA Department of Education Web site or the state in which the HSD/ GED is located in.
    - Verify Foreign High School Diploma or transcripts by requesting course description from high school and or outsourcing a company to validate the equivalency of the diploma.
    - Diploma mills and Ability to Benefit are not accepted.
    -

## High School Diploma Verification

### Foreign High School Verification Policy

**Foreign High School diploma or transcript** - Note: The high school diploma or transcript requirement can also be from a foreign school if it is equivalent to a U.S. high school diploma; Documentation of proof of completion of secondary education from a foreign country must be **officially translated into English and officially certified as the equivalent of high school completion in the United States.)** High school diplomas/transcripts from other countries are acceptable toward the student eligibility general requirement, as



long as the diploma is equivalent to a U.S. high school diploma. All foreign diplomas will be evaluated at the expense of the student by a third-party company experienced and credentialed. This policy is for all non-Title IV programs.

### **Title IV Programs Foreign High School diploma or transcript**

Note: The high school diploma or transcript requirement can also be from a foreign school if it is equivalent to a U.S. high school diploma; Documentation of proof of completion of secondary education from a foreign country must be **officially translated into English and officially certified as the equivalent of high school completion in the United States.**)

Student's transcripts will be evaluated by a third-party company who is credentialed in the process will examine the transcript for equivalency. Students applying for federal aid will not be required be charged a fee by the school for the evaluation process because that would amount to the school charging a fee to complete the FAFSA, which is prohibited under HEA 483(a)(6). In such cases, because the cost of evaluating a foreign credential is incurred as a charge of admission prior to enrollment in an eligible program, it cannot be included in students' cost of attendance (COA).

If the student is selected for verification tracking groups V4 or V5, in which the student must provide proof of high school completion, when it is impossible for a refugee, asylee or victim of human trafficking to obtain documentation of his or her completion of a secondary school education in a foreign country, you may accept self-certification that they have completed a high school (or equivalent) education from these applicants, along with their entry status documentation that demonstrates the applicant's current or prior status as a refugee, asylee, or victim of human trafficking who entered the U.S. after the age of 15.

### **Foreign High School Verification Procedure**

- **Responsibilities:**
  - **Admission/Financial Aid Administrator**
    - Accept the diploma
    - Accept payment for evaluation if student is not a Title IV student
    - Submit diploma for evaluation to third party servicer if student is a Title IV student
    - Notify student of outcome in writing of the evaluation.
    - Notify FA if student is a Title IV student.

## **STATE GRIEVANCE PROCEDURES**

### **State Grievance Policy**

A grievance is a just or supposed basis for complaint arising out of any alleged unauthorized or unjustified act or decision made by a member of the Grievance committee that in any way adversely affects the status, rights, or privileges of a student. An aggrieved student may complain to the administration to correct the problem. The burden of proof is on the individual who submits a complaint. The grievance process is not the

correct means for appealing disciplinary actions, for contesting a grade, or appealing an academic decision. (See separate policies within the Catalog and/or Student Handbook.)

## State Grievance Procedures

- Responsibilities
  - Grievance Committee
    - Follow the step listed below

### Step 1 — Informal Action

Seek resolution first through direct, informal communication with the responsible person. Discussion between those involved is encouraged at all stages, but is essential in the early stages of resolution. Following an unsuccessful attempt to resolve the conflict one on one, students are encouraged to discuss the matter with their faculty mentor or with School Director, as appropriate. After the student has made every available effort to resolve the conflict in an informal manner, formal action may be taken.

### Step 2 – Formal Action

1. State the grievance in writing (write a complaint) within 30 days of the alleged event and submit the complaint to the School Director. No special form is needed, but the complaint must include:
  - The date you submit the complaint;
  - A description of the grievance that includes all relevant information such as date(s), when the problem was evident, evidence substantiating the grievance, and witnesses; and
  - A proposed resolution, that is, what you want to happen to resolve the grievance.
2. The School Director has two working days from the date of receipt to forward the grievance to the school's grievance committee member who will serve as mediator to resolve the matter. Care will be taken to ensure that the mediator has the expertise necessary to resolve the grievance.
3. The mediator has two working days from the date of receipt to:
  - Send to the student an acknowledgement that briefly summarizes the grievance and informs the student that a resolution will be sent within ten working days, and
  - Forward to the School Director a copy of the grievance and acknowledgement.
4. The mediator has ten working days from the date of receipt to:
  - Investigate the alleged basis for the complaint;
  - Investigate previous efforts taken to resolve the grievance
  - Investigate any contingencies and take such action that may help resolve the grievance;
  - Send to the aggrieved student a formal response (a statement describing what was or will be done to resolve the grievance); and
  - Forward to the School Director a copy of the formal response.
5. If the student is satisfied with the formal response, the grievance is resolved.
6. If the student is not satisfied with the formal response, a request for a hearing may be made to the Grievance Committee, which:
  - Shall be given a copy of the case to date;
  - Shall schedule a hearing date and time within seven working days of the request and notify all concerned (but not necessarily invite them to attend);
  - May invite the student and any witnesses to attend the hearing the student does not have a right to attend;

- Shall conduct the hearing as informally as possible, while reviewing and evaluating the case;
- Shall keep its deliberations confidential; and
- Shall, by majority vote, recommend to the School Director a course of action to finally resolve the grievance.

The School Director will issue a decision, which shall be final, in writing to the student within three working days of the hearing. The School Director and committee is tasked with the overall responsibility for collecting and securing documentation, and for ensuring confidentiality of all matters related to any filed grievance or complaint.

In accordance with requirements issued by the U.S. Department of Education, any student who has already followed the Grievance/Complaint Procedures as noted above, and feels the issue is not resolved, may contact our accrediting agency:

Arkansas does not have a formal grievance complaint process, however the student may contact the Arkansas Attorney General Office

## Professional Judgement

### Professional Judgement Policy

Financial Aid Administrator has the authority to make case-by-case adjustments of the data items used to calculate a student's EFC, based on adequate documentation to address current circumstances not reflected on a student's FAFSA. The thoughtful use of professional judgment may be critical to a student's ability to begin or continue with postsecondary education. When making a professional judgment adjustment to student or family income, it is appropriate for the Financial Aid Administrator to consider if the use of prior-year income is the best predictor of income for the upcoming award year. A professional judgment adjustment may be warranted if a family member experienced a significant change of income, either upward or downward. Alternatively, the Financial Aid Administrator may choose to use more recent income that the FAA believes more accurately reflects the family's current financial circumstances, i.e., the student or parent moved from part-time employment to full-time employment.

### Professional Judgement Procedure

- **Responsibilities:**
  - **Financial Aid Administrator**
    - **Must obtain and maintain documentation of the changed circumstances supporting the Professional Judgment (PJ) decision**
    - **Exercise PJ where appropriate, only the cases of special circumstances**
    - **Seek the assistance of Financial Aid Management Education (FAME) when necessary**
  - **School Director**
    - **Meet with the Financial Aid Administrator to review documentation**
    - **Make the final decision based on adequate documentation**

# Verification

## Verification Policy

Every year a number of students who are eligible for financial aid are randomly selected for verification by the U.S. Department of Education by the FAFSA Central Processing System (CPS). If a student is selected for federal verification, they will be asked to complete a Verification Worksheet (provided by the Office of Financial Aid Administrator) and must provide additional information before financial aid can be disbursed to the student account. This documentation may include but is not limited to federal income tax transcript and W-2 forms (student's, spouse and/or parents/guardians), proof of untaxed income, housing allowances, etc. Students will be notified in writing of all documents required to fulfill this federal requirement and what their verification code (V1 – V6) was so they can complete the required verification requirement. If after review by the Office of Financial Aid Administrator, there are any changes to the financial aid package the student will be notified in writing.

## APPLICATIONS AND INFORMATION TO BE VERIFIED

The Department's long-term goal is for a customized approach to verification. A menu of potential verification items for each award year will be published in the Federal Register, and the items to verify for a given application will be selected from that menu and indicated on the student's output documents. Output documents will continue to include only one verification flag to show students who were selected, and they will need to verify all the FAFSA items shown in the margin that apply to them.

The verification flag will have a value of "Y," and next to the EFC will be an asterisk referring to a comment in the student section of the SAR that tells applicants they will be asked by their schools to provide documentation. A verification tracking flag will be set on the applicant's Institutional Student Information Record (ISIR) to indicate placement in one of the 2016–2017 verification tracking groups.

In some cases you, not the CPS, will select a student for verification. You must verify any information you have reason to believe is incorrect on any application. At your discretion, you may require a student to verify any FAFSA information and to provide any reasonable documentation in accordance with consistently applied school policies. In either situation you may, but are not required to, include any of the 2016–2017 CPS verification items not already included. Even if you don't do that, students with these applications are considered selected for verification and, as with CPS-selected applications, all other verification requirements, such as deadlines, allowable tolerances, and interim disbursement rules, apply.

If you want to learn more about verification results, you can use the ISIR Analysis Tool, which provides a variety of reports and analyses that can help you identify potentially faulty applications that discretionary verification or the CPS edits might be missing. They can also help you develop discretionary verification edits that focus on student changes that affect the EFC and Pell eligibility. The 2016–2017 edition should be available in July 2016.

Verification tracking groups Students who are selected for verification will be placed in one of the following groups to determine which FAFSA information must be verified.

V1—Standard Verification Group. Students in this group must verify the following if they are tax filers:

- adjusted gross income • U.S. income tax paid • untaxed portions of IRA distributions • untaxed portions of pensions • IRA deductions and payments • tax-exempt interest income • education credits • household size

Verification items for 2016–2017 34 CFR 668.56 The verification items for 2015–2016 remain for 2016–2017: • Adjusted gross income (AGI) • U.S. income tax paid • Education credits • Untaxed IRA distributions • Untaxed pensions • IRA deductions and payments • Tax-exempt interest • Other untaxed income • Income earned from work • Household size • Number in college • Supplemental Nutrition Assistance Program (SNAP) benefits • Child support paid • High school completion status • Identity/statement of educational purpose

**See the June 26, 2015, Federal Register.**

Changing tracking groups Beginning with 2016–2017 a student may move from Verification Tracking Group V1, V4, or V6 to group V5 based on corrections made to her CPS record or on other information available to the Department. If verification was already completed for the previous group, the student is only required to verify the V5 information that was not already verified. If verification was not completed for the previous group, the student only needs to verify the V5 information.

No disbursements of Title IV aid may be made until the V5 verification is satisfactorily completed. If the applicant doesn't complete verification, the school is not liable for any Title IV aid it disbursed prior to receiving the group V5 ISIR. The applicant is liable for the full amount because without verification there is no evidence she was eligible for that aid. More information on reporting the receipt of such ineligible funds to the Department will be provided in a future electronic announcement.

Students who are not tax filers must verify the following:

- income earned from work • household size • number in college • SNAP benefits • child support paid

V2—Reserved for future use by the Department.

V3—Reserved for future use by the Department. V4—

Custom Verification Group.

Students must verify high school completion status and identity/statement of educational purpose in addition to receipt of SNAP benefits and payment of child support.

V5—Aggregate Verification Group.

Students must verify high school completion status and identity/statement of educational purpose in addition to the items in the Standard Verification Group.

V6—Household Resources Group.

Students must verify the items in the Standard Verification Group as well as certain other untaxed income on the 2016–2017 FAFSA:

- payments to tax-deferred pension and retirement savings plans (Questions 45a and 94a); • child support received (Questions 45c and 94c); • housing, food, and other living allowances paid to members of the military, clergy, and others (Questions 45g and 94g); • veterans' noneducation benefits (Questions 45h and 94h); • other untaxed income (Questions 45i and 94i); • money received or paid on the applicant's behalf (Question 45j); and • resources or benefits not appearing on the FAFSA, such as in-kind support from a relative or a government agency.

Reporting results for groups V4 and V5 You must report the verification results of identity and high school completion status for any student for whom you receive an ISIR with tracking flag V4 or V5—as selected by the CPS, not your school—and request verification documentation. You report this information on the FAA Access to CPS Online website: select the Identity Verification Results option from the main menu, enter your school identifiers, the year, and the student identifiers. You will then enter one of the following numeric codes that most applies:

Online verification assessment module ([http://ifap.ed.gov/qahome/assessments/fsa\\_verification.html](http://ifap.ed.gov/qahome/assessments/fsa_verification.html))

### **Verification questions/answers**

The Department has a list of questions and answers about verification online. See ([www2.ed.gov/policy/highered/reg/hearulemaking/2009/verification.html](http://www2.ed.gov/policy/highered/reg/hearulemaking/2009/verification.html)).

Verification following disasters Dear Colleague Letter GEN-10-16 gives general guidance for when federally declared disasters affect the awarding of aid. The DCL states that the Secretary will not enforce the verification requirements during the award year for applicants whose records were lost or destroyed because of a disaster. The school must document when it does not perform verification for this reason and use status code “S” when reporting the disbursement of Pell Grants to affected students.

### **HEROES Act modifications:**

Provides for the modification and waiving of some statutory and regulatory provisions related to students who receive financial aid and who are on active duty during a war or other military operation or who reside or are employed in a declared disaster area. These adjustments apply to return of funds and signature requirements for verification and application, among other things. The most recent update to the HEROES Act authorized its provisions through September 30, 2017. See pages 59311–59318 of the Federal Register dated September 27, 2012, for the details on the act and a list of the eligible students.

#### **Death of the student.**

You don’t have to continue verification if you made an interim disbursement and the student died before verification was completed. You cannot make any additional disbursements, except for FWS funds already earned, to any of the student’s beneficiaries. You cannot originate or disburse his Direct Subsidized Loan or consider any interim disbursement you made of Pell, Perkins, or FSEOG funds or provisional FWS employment to be an overpayment. See Chapter 2 of Volume 5.

#### **Not an aid recipient.**

The student won’t receive Title IV aid for reasons other than a failure to complete verification. This includes being ineligible for that aid and withdrawing without receiving it.

#### **The applicant is eligible to receive only unsubsidized student financial assistance.**

##### **Applicant verified by another school.**

The student completed verification for the current award year at another school before transferring. Her FAFSA data must be the same as it was at the previous school, and you must get a letter from that school stating that it verified her application and providing the transaction number of the pertinent valid ISIR.

#### **Post enrollment.**

The student was selected for verification after ceasing to be enrolled at your school and all (including late) disbursements were made.

#### **Verification exclusions 34 CFR 668.54(b)**

- Both of the parents are mentally incapacitated.
- Both parents and the custodial parent has died.
- They are residing in a country other than the United States and can’t be contacted by normal means.
- They can’t be located because the student does not have and cannot get their contact information.

Unless you have reason to believe it is inaccurate, you don’t have to verify the reported FAFSA information of the spouse of an independent student if any of the following apply:

- The spouse has died.
- He is mentally incapacitated.
- He is residing in a country other than the United States and can’t be contacted by normal means.
- He can’t be located because the student does not have and cannot get his contact information.

IFAP website at [www.ifap.ed.gov](http://www.ifap.ed.gov)

## Verification Policy Procedure

- **Responsibilities:**
  - **Financial Aid Administrator**
    - **Notify the student that they have been selected for verification**
    - **Set a deadline for student to submit necessary documents clarify conflicting information**
    - **Correct information as needed**
    - **Establish a method of notifying the student of award changes due to verification**

# Conflict Information

## Conflict Information Policy

Applications are selected for verification either by the CPS or by the school. The student's ISIR shows an asterisk next to the EFC, in the upper right-hand section of the ISIR. Comments are found in the student section of page 1. The asterisk indicates to applicants that they will be required to provide certain financial documents and family information. Beginning with the 2017-18 Award Year, the student/parent may ask the IRS to update information on the FAFSA with IRS tax information which eliminates the need to collect tax returns. If the student has not asked the IRS to update the information on the ISIR, the student/parent will be asked to provide tax transcripts. On page 3 of the ISIR, below the dotted line on the right side there will be a Verification Tracking Flag, V1 through V6 which indicates the verification information which must be collected.

The Northern Technical College Financial Aid Administrator must verify any application information that it has reason to believe is incorrect or discrepant. These applications are selected for verification by the school even though it may not be verifying the same data as for the CPS selected applicants.

**Even if the student is not selected for verification, inconsistent information must be resolved. Some examples which must be resolved:**

## Conflict Information Procedure

### Responsibilities:

- Financial Aid Administrator
  - Verify information provided on the student's Northern Technical College intake form, ISIR and on the Taxes.
  - Notify students of conflicting information and allow them 5-7 business days to provide documentation correction or proving the information provided (except for extenuating circumstances with the approval of director and/or financial aid administrator)
  - Ask students to make any corrections that is conflicting such as number of dependents on taxes and number of dependents on ISIR or marital status.
  - Correct errors or inconsistencies and once ISIR is received with all changes, aid may be disbursed.
  - Notify student of changes due to corrected ISIR
  - Submit award letter to student

# Citizenship and Immigration Status Documentation & Verification

## Citizenship & Immigration Status Policy

A student must be one of the following to be eligible to receive federal student aid:

- A U.S. citizen or national;
- A U.S. permanent resident or other eligible noncitizen
- A citizen of the Freely Associated States

If a student must prove his status as a U.S. citizen or national, only certain types of documents are acceptable. A Social Security card or driver's license isn't acceptable for documenting U.S. citizenship or national status since noncitizens and non-nationals can also have these forms of identification. "Enhanced" driver's licenses (provided by a limited number of states to permit non-air travel entry to the U.S. from Canada, Mexico, and the Caribbean) are also not acceptable.

Before you can disburse aid, the student must present documentation that verifies he is a U.S. citizen. If the documents indicate that the student is a U.S. citizen or national, you may award and disburse aid to the student and the C-code may remain on the student's ISIR. Unlike the case of eligible noncitizens, you don't submit the documents to the DHS/USCIS or any other agency for verification of U.S. citizenship, but you do need to keep a copy of the documentation in the student's file. Older versions of the Certificate of Citizenship and of the Certificate of Naturalization instruct the holder not to photocopy them. The student can also contact the Social Security Administration to update its record. This updating is not required to receive aid. If the student presents acceptable documentation, the C code can remain on the student's record.

The Department doesn't specify all of the acceptable documents, but here are some documents you might choose to use:

## Citizenship & Immigration Status Procedure

- **Responsibilities:**
  - **Financial Aid Administrator-** The Department doesn't specify all of the acceptable documents, but here are some documents you might choose to use:
    - A copy of the student's birth certificate showing that the student was born in the United States, which includes Puerto Rico (on or after January 13, 1941), Guam, the U.S. Virgin Islands (on or after January 17, 1917), American Samoa, Swains Island, or the Northern Mariana Islands, unless the person was born to foreign diplomats residing in the U.S. If a student has a birth certificate from a U.S. jurisdiction showing that the student was born abroad (i.e., not in the U.S. or its territories), that birth certificate is not acceptable documentation.
    - A U.S. passport, current or expired, (except "limited" passports, which are typically issued for short periods such as a year and which don't receive as much scrutiny as a regular passport when applying). In the case of nationals who are not citizens, the passport will be stamped



“Noncitizen National.” Five-year-duration U.S. passports (commonly issued to younger students) are considered acceptable documentation, and are not considered “limited”. Passport cards are also acceptable; however, one-year-duration U.S. passports are NOT acceptable documentation.

- The State Department issues a wallet-sized passport card that can only be used for land and sea travel between the United States and Canada, Mexico, the Caribbean, and Bermuda. It is adjudicated to the same standards as the passport book and is therefore a fully valid attestation of the U.S. citizenship and identity of the bearer.
- A copy of Form FS-240 (Consular Report of Birth Abroad), FS-545 (Certificate of birth issued by a Foreign Service post), or DS-1350 (Certification of Report of Birth). These are State Department documents.
- A Certificate of Citizenship (N-560 or N-561) issued by USCIS to individuals who derive U.S. citizenship through a parent.
- A Certificate of Naturalization (N-550 or N-570) issued by USCIS (or, prior to 1991, a federal or state court), or through administrative naturalization after December 1990 to those who are individually naturalized.

## Academic Year Definition

### Academic Year Definition Policy

For purposes of defining an academic year, a week is a consecutive seven-day period; a week of instructional time is any week in which at least one day of regularly scheduled instruction or examinations occurs or, after the last scheduled day of classes for a term or payment period, at least one day of study for final examinations occurs; and instructional time does not include any vacation periods, homework, or periods of orientation or counseling.

For a program that measures program length in clock hours, a minimum of 26 weeks of instructional time; and a minimum of 26 weeks of instructional time; and 900 clock hours.

Northern Technical College offers Barbering that measures program length in 1500 clock hours, five days a week (Full time, 34, hrs./wk.) a minimum of 66 weeks of instructional time. Barbering for a part-time student is a minimum of 20 hrs/113 weeks for 1500 clock hours. Barber Instructor is offered that measures program length in 700 clock hours 31 weeks for full time students and 53 weeks part-time students.

### Academic Year Definition Procedures

- Responsibilities:
  - Admission/Financial Administrator
    - Communicate to students what an academic year is in clock hours

# Leave of Absence

## Leave of Absence Policy

An authorized leave of absence (LOA) is a temporary interruption in a student's program of study. LOA refers to the specific time period during a program when a student is not in attendance. An LOA is not required if a student is not in attendance only for an institutionally scheduled break. However, a scheduled break may occur during an LOA.

A LOA must meet certain conditions to be counted as temporary interruption in a student's education instead of being counted as a withdrawal requiring an institution to perform a refund calculation. For a student at Northern Technical College to be approved for a Leave of Absence whether for medical or personal reason, the following conditions must be met:

- All requests for leaves of absence be submitted in advance in writing, include the reason for the student's request, and include the student's signature.
- the student has completed and signed a school leave of absence request form within two weeks of leave unless of extenuating circumstances
- due to unforeseen circumstances, the institution may grant the request and will document the reason for its decision and collect the request form from the student at a later date
- the beginning date of the approved LOA would be determined by the institution to be the first date the student was unable to attend the institution because of the accident
- The leave of absence does not exceed 180 days with any additional leaves with a twelve-month period
- the school has not granted a leave to the student within 12 months of current request
- A student granted an LOA that meets these criteria is not considered to have withdrawn, and no refund calculation is required at that time
- the student contract will be extended by the same number of days taken in the LOA. The contract period on the enrollment agreement must be initialed by all parties or an addendum must be signed and dated by all parties.
- The student's contract period will be extended the same of days taken in the LOA. Changes on the enrollment agreement will be initiated by all parties and/or an addendum will be signed and dated by all parties. Fees will not assess the student any additional institutional charges as a result of the LOA.
- At an institution required to take attendance, the withdrawal date for the purpose of calculating a refund is always student's last day of attendance.
- The institution requires that students are expected to return after their LOA ready for teaching and learning

When the student returns from a LOA, the student's education will continue from the actual hours earned. The start and ending date will be adjusted accordingly.

Please note that any student who fails to return to the school at the end of an approved leave of absence is considered to have withdrawn from the school.

Students who do not follow the procedure for obtaining an *approved Leave of Absence* will be subject to the school's stated policies on attendance for any and all absences recorded, regardless of circumstances.

## Leave of Absence Procedures

### Responsibilities:

- School Director
  - Receive request in advance in writing, include the reason for the student's request, and include the student's signature within two weeks.
  - Approve the leave
  - Make sure the leave of absence does not exceed 30 days with any additional leaves with a twelve-month period (only 1 leave will occur within 12 month. Period)
  - Make an addendum on original contract to make sure it is the same amount days taken in the LOA.
  - Make sure the education of the student continues upon his return
  - Request in advance in writing a request for a leave of absence
  - Get approval following the policy of the institution
  - Make sure it doesn't exceed 30 days with any additional leaves with a twelve-month period
  - Make sure an addendum is made to student contract
  - Return with request days of actual leave of absence

## General Consumer Information Policies and Procedures

### Student-Right-to-Know

Student Right to Know and Consumer Information contains information required by law for the Student Right to Know and Clery Act and other information that might be helpful to you including FERPA [Family Educational Rights and Privacy Act]. It is designed to inform current and prospective students and their parents about information that is vital to understanding their rights and responsibilities and the policies of Northern Technical College. Students will be notified yearly of the information available through various means such as the Northern Technical College website, text messages, school wide assemblies, during orientation, or during the enrollment process.

### Student Right-to-Know Procedure

- **Responsibilities:**
  - Admission Administrator
    - Will inform perspective students of their rights and given appropriate handouts during the enrollment process or alert them to website with the proper information. Paper copy is available in FA office if student request a copy.
      - Enrollment packet
      - Clery Information
      - FERPA forms
      - Drug and Alcohol Handbook

- Consumer Information Handbook
- School Director
  - Will review and update the website every six months in May and December with Consumer information as needed
  - Will post and notify Clery information to students every year by Oct 1<sup>st</sup> as well as update the Northern Technical College website
  - Will make available the Drug and Alcohol Handbook yearly in February and update the website
  - Will review and update policies in the Consumer Handbook every year in November.
- Financial Aid Administrator and/or School Director
  - Will share with new students the consumer information and student's right to know information during orientation through
    - Power Point Presentations/Paper copy if available and requested.
    - Website/Students will sign an acknowledgement page verifying viewing this information

## Facilities & Services Available to Students with Disabilities

### Facilities & Services for Students with Disabilities Policy

#### Students with Disabilities

Northern Technical College does not discriminate against students and applicants on the basis of disability, in the administration of its educational and other programs. Northern Technical College reasonably accommodates qualified students (including applicants) with disabilities as defined by applicable law, if the individual is otherwise qualified to meet the fundamental requirements and aspects of the program of Northern Technical College, without undue hardship to Northern Technical College. For purposes of reasonable accommodation, a student or applicant with a disability is a person who has learning, physical or psychological impairment which limits one or more major life activities (such as walking, seeing, speaking, learning, or working).

### Facilities & Services for Students with Disabilities Procedure

- **Responsibilities:**
  - Admission Administrator
    - Notifies the student of the option to share their disability on their medical history form
    - Encourages the student to provide the necessary documentation outlining his or her disability.
  - School Director
    - Evaluates if Northern Technical College can accommodate and can give reasonable accommodations.
    - If reasonable accommodations can be met, Northern Technical College will complete an accommodations page, submit a copy to the instructor, one to the student, and the other in the student's file
    - If reasonable accommodations cannot be met by Northern Technical College, the student will be referred to a partnered agency (Arkansas Vocational Rehab.

Services) for assistance in providing such accommodations either with Northern Technical College or with a different institution.

## Copyright Infringement and Sanctions

### Copyright Infringement & Sanctions Policy

**Northern Technical College takes Copyrighting Infringement very serious. Whether it be distribution of Copyrighted material or unauthorized peer-to-peer file sharing, may subject the students to civil and criminal liabilities.**

Copyright infringement is the act of exercising, without permission or legal authority, one or more of the exclusive rights granted to the copyright owner under section 106 of the Copyright Act (Title 17 of the United States Code). These rights include the right to reproduce or distribute a copyrighted work. In the file-sharing context, downloading or uploading substantial parts of a copyrighted work without authority constitutes an infringement.

Penalties for copyright infringement include civil and criminal penalties. In general, anyone found liable for civil copyright infringement may be ordered to pay either actual damages or “statutory” damages affixed at not less than **\$750** and not more than **\$30,000** per work infringed. A court can, in its discretion, also assess costs and attorneys’ fees. For details, see Title 17, United States Code, Sections 504, 505.

Willful copyright infringement can also result in criminal penalties, including imprisonment of up to five years and fines of up to **\$250,000** per offense. For more information, please see the website of the U.S. Copyright Office at ([www.copyright.gov](http://www.copyright.gov)).

Works protected by copyright may be copied only with the copyright holder’s permission, unless the copying is considered a “fair use”. The Copyright Act provides for but does not clearly demarcate the boundaries of fair use. Thus, a determination using the available standards and guidelines should be undertaken before making copies of a copyrighted work without permission of the copyright holder.

### Copyright Infringement Procedure

- **Responsibilities:**
  - **Instructors and Administrative Staff**
    - Instructors must use the textbooks and workbooks provided to each student
    - There shall be not be copying from workbooks, exercises, standardized test booklets answer sheets or a similar material intended to be consumed in the course of study or teaching.
    - In the event of obtaining permission to copy, the following steps must be taken:
      1. Obtain Name and Address of Owner/Controller Determine who holds the copyright to the material. The page containing a notice of copyright can help you determine who holds the copyright, the year of publication and the

publisher's address. The acknowledgement page may also contain information regarding copyright ownership or control.

- 2. Request Permission to Duplicate. A request containing the information listed below should be sent to the permission department of the publisher in question. Provide complete and accurate information regarding the work to be duplicated such as:
  - Title, author and/or editor; copyright or publication date and edition of the book in which the materials to be duplicated appear;
  - Exact material to be used, giving amount, page numbers, chapters and, if possible, a photocopy of the material and title and copyright page;
  - Number of copies to be made;
  - Use to be made of duplicated materials and form of distribution (e.g., as course material and whether collected with other excerpts or materials, whether bound or unbound);
  - Whether the material is to be sold,
  - Type of reprint (ditto, photocopy, offset, typeset).
  - Prior to making the copies, the information above must be submitted to the Director's office. After verification, only then can copies be made.
  - In order to monitor this policy and procedures, all printing and copying are limited to under 500 copies for each instructors per month. Additionally, all copies are reviewed by the administrative staff member as copies are obtained from the copy machine located in the FA office.

## School Program Accreditation & Approval

### School Program Accreditation Policy

#### Accreditations

Northern Technical College was awarded its National Accreditation Commission of Career Arts & Science(NACCAS) in May 2017 and adheres to the rules, regulations and standards of quality of the Commission.

#### Licensure

Northern Technical College is licensed by the State Arkansas Board of Barber Examiners and adheres to the rules and regulation of the Arkansas Barber Law.

### School Program Accreditation Procedure

#### Responsibilities:

- School Director
  - Review the Self Study yearly updating areas in need.

- Oversee the planning of all in-services required by state and accreditation agencies
- Submit all documents for new employees and programs for approvals when necessary.
- Submit all documents needed for Reporting information
  - CPL data- November of each year for NACCAS
  - Graduation data- November of each year for NACCAS
  - Auditing data-
    - October of each year for COE
    - October of each year for BOR
    - April of each year of DOE

## School Accreditation

### School Accreditation Policy

#### Accreditations

Northern Technical College was awarded its National Accreditation from The National Accrediting Commission of Career Arts and Sciences in May 2017 and adheres to the rules, regulations and standards of quality of the Commission.

#### School Accreditation Procedure

#### Responsibilities:

- School Director
  - Review the Institutional Self Study yearly updating areas in need.
  - Oversee the planning of all in-services required by state and accreditation agencies
  - Maintain the NACCAS filing draw and /or binder with all necessary documents
  - Submit all documents for new employees and programs for approval when necessary.
  - Submit all documents needed for Reporting information
    - Annual Report data- November of each year for NACCAS
    - Graduation data- November of each year for NACCAS
    - Placement data- November of each year for NACCAS
    - Licensure/certification Rates- November of each year for NACCAS
      - November of each year for NACCAS

## School State Approval

### School State Approval Policy

#### Licensure

Northern Technical College is licensed by the State of Arkansas Board of Barber Examiners and adheres to the rules and regulation of the Arkansas Board of Barber Examiners.

### School State Approval Procedure

- **Policy:** See above policy
- **Purpose:** To ensure that Northern Technical College remains in the guidelines of the accreditation agency guidelines and state approvals
- **Responsibilities:**
  - School Director
    - Review the Institutional Self Study yearly updating areas in need.
    - Oversee the planning of all in-services required by state and accreditation agencies
    - Submit all documents needed for Reporting information
      - Graduation data- November of each year for NACCAS
      - Auditing data- November of each year for e-Z audit

## Voter Registration

### Voter Registration Policy

The institution must make the voter registration forms widely available to its students. It must individually distribute the forms to its degree- or certificate-seeking (Federal Student Aid-eligible) students. The school can mail paper copies, or, alternatively, it may distribute voter registration forms by electronically transmitting to each student a message containing an acceptable voter registration form or an Internet address where that form can be downloaded.

The electronic message must be devoted exclusively to voter registration. In states where this condition applies, schools must request voter registration forms from the state 120 days prior to the state's deadline for registering to vote. This provision applies to general and special elections for federal office and to the elections of governors and other chief executives within a state. If a school does not receive the forms within 60 days prior to the deadline for registering to vote in the state, it is not liable for failing to meet the requirement during that election year.

### Voter Registration Procedure

- **Responsibilities:**
  - Admission Administrator
    - Ensure that voter registration forms are in all perspective student's enrollment packet
  - Financial Aid Administrator
    - Guide new students to the website giving them access to the voting registry link during every orientation
    - Have students sign the acknowledgment page



# IPEDS Report

## IPEDS Policy

The information on completion, graduation rates and, if applicable, transfer-out rates must be made available by the July 1 immediately following the 12-month period ending August 31 during which the expiration of 150% of normal time took place for the group of students on which Northern Technical College bases its completion and transfer-out rate calculation.

Schools must disseminate the information on completion or graduation and, if applicable, transfer-out rates to enrolled and prospective students upon request, through appropriate publications, mailings, or electronic media (for example, school catalogs or admissions literature). Northern Technical College provides hard copies to other interested parties, upon request.

## IPEDS Procedure

- **Responsibilities:**
  - **School Director/Financial Aid Administrator**
    - Will input the data required into the Database during the reporting periods
      - Data will be gathered through electronic means and physical means by the School Director along with other administrative support
    - Will input the data required into the IPEDs reporting system during the reporting periods.
    - A binder will be kept in the Director's office with the necessary documents supporting the IPEDS reporting data until such data is available electronically.
    - Will ensure the reporting data is uploaded to the Northern Technical College website for review along with the following links.
      - College Navigator
      - Net Price Calculator

# Constitution and Citizenship Day

## Constitution & Citizenship Day Policy

In 2004, Congress passed a provision that every school and college that receives federal funding must teach students about Constitution of the United States each year on September 17, the day this historical document was adopted in 1787. Each year on September 17 (or the 16<sup>th</sup> or 18<sup>th</sup> if the 17<sup>th</sup> falls on a weekend) holds a Constitution Assembly for its students. The students are exposed to elements of the Constitution through creativity, classroom involvement, and break time activities. Each instructor is required to add an element of instruction that involves the Constitution into their daily lesson plan.

## Constitution & Citizenship Day Procedure

- **Policy:** See above policy
- **Purpose:** To provide education of the importance of Constitution Day
- **Responsibilities:**

- Instructors
  - Have each instructor share information from the Constitution books in the classroom icebreaker
  - Conduct school wide informational activities to inform students of the Constitution day. (powerpoint presentation)
- Business Administrator
  - Order Cake for Refreshments two days prior to event (optional)
  - Decorate the schools with Flags the day before the event'
  - Place order using requisition for Flags, etc.
- School Director
  - Design a school song playlist with American focus songs on Northern Technical College iPad/Computer

## Gainful Employment General Information

### Gainful Employment Policy

Generally, in order to be eligible for funding under the Higher Education Act Title IV student assistance programs, an educational program must lead to a degree at a non-profit or public institution or it must prepare students for "gainful employment in a recognized occupation." Therefore, with very few exceptions, any non-degree program offered by nonprofit or public institutions and all educational programs offered at for-profit institutions must lead to gainful employment.

Northern Technical College reports employment information to current and prospective student information about the institution's Gainful Employment program through a disclosure template developed by Department of Education.

It is necessary for Northern Technical College to ensure awareness of the NSLDS Gainful Employment User Guide and Gainful Employment (GE) tracking information to the appropriate parties who are responsible for compiling and completing the GE report and to update the Northern Technical College website.

### Gainful Employment Procedure

- **Responsibilities:**
  - **School Director**
    - Will input the date required into the Database during the reporting periods
      - Data will be gathered through electronic means and physical means by the School Director along with other administrative support
    - Will impute the data required into the IPEDs reporting system during the reporting periods.
    - A binder will be kept in the Director's office with the necessary documents supporting the Gainful Employment reporting data until such data is available electronically.
    - Will ensure the reporting data is uploaded to the Northern Technical College website for review along with the following links.

- College Navigator
- Net Price Calculator
- Disclosure updates:
  - In accordance with procedures and timelines established by the Secretary, the institution must update at least annually the information contained in the disclosure template with the most recent data available for each of its GE Programs.
  - The institution must update the disclosure template to include any student warnings as required under 34 CFR 668.410(a)(7).
- Program Web pages
  - On any Web page containing academic, cost, financial aid, or admissions information about a GE program maintained by or on behalf of an institution, the institution must provide the disclosure template for that program or a prominent, readily accessible, clear, conspicuous, and direct link to the disclosure template for that program (The Secretary may require the institution to modify a Web page if it provides a link to the disclosure template and the link is not prominent, ready accessible, clear, conspicuous, and direct).
- Promotional materials
  - All promotional materials made available by or on behalf of an institution to prospective students that identify a GE program by name or otherwise promote the program must include:
    - The disclosure template in a prominent manner; or
    - Where space or airtime constraints would preclude the inclusion of the disclosure template, the Web address (URL), of, or the direct link to, the disclosure template, provided that the URL or link is prominent, readily accessible, clear, conspicuous, and direct and the institution identifies the URL or link as “Important Information about the educational debt, earnings, and completion rates of students who attended this program” or as otherwise specified by the Secretary in a notice published in the Federal Register.
  - Promotional materials include, but are not limited to an institution’s catalogs, invitations, flyers, billboards, and advertising on or through radio, television, print media, the Internet, and social media.
  - The institution must ensure that all promotional materials, including printed materials, about a GE program are accurate and current at the time they are published, approved by a State agency, or broadcast.
- Direct distribution to prospective students
  - Before a prospective student signs an enrollment agreement, completes registration, or makes a financial commitment to the institution, the institution must provide the prospective student or a third party acting on behalf of the prospective student, as a separate document, a copy of the disclosure template.
  - The disclosure template may be provided to the prospective student or third party by:

- Hand-delivering the disclosure template to the prospective student or third party individually or as part of a group presentation; or
- Sending the disclosure template to the primary email address used by the institution for communicating with the prospective student or third party about the program.
- If the institution hand-delivers the disclosure template to the prospective student or third party, it must obtain written confirmation from the prospective student or third party that the prospective student or third party received a copy of the disclosure template.
- If the institution sends the disclosure template to the prospective student or third party by email, the institution must:
  - Ensure that the disclosure template is the only substantive content in the email
  - Receive electronic or other written acknowledgement from the prospective student or third party that the prospective student or third party received the email
  - Send the disclosure template using a different address or method of delivery if the institution receives a response that the email could not be delivered; and
  - Maintain records of its efforts to provide the disclosure template
- Disclosure templates by program length, location, or format
  - An institution that offers a GE program in more than one program length must publish a separate disclosure template for each length of the program. The institution must ensure that each disclosure template clearly identifies the applicable length of the program.
  - An institution that offers a GE program in more than one location or format (e.g., full-time, part-time, accelerated) may publish a separate disclosure template for each location or format if doing so would result in clearer disclosures under 34 CFR 668.412(a). An institution that chooses to publish separate disclosure templates for each location or format must ensure that each disclosure template clearly identifies the applicable location or format.
  - If an institution publishes a separate disclosure template for each length, or for each location or format, of the program, the institution must disaggregate, by length of the program, location, or format, those disclosures set for in 34 CFR 668.412(a)(4) and (5), 668.412(a)(7) through (9), and 34 CFR 668.412(a)(14) and as otherwise provided by the Secretary in a notice published in the Federal Register.

## FERPA Requirements

## FERPA Policy

The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.

FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level. Students to whom the rights have transferred are "eligible students."

Parents or eligible students have the right to inspect and review the student's education records maintained by the school. Schools are not required to provide copies of records unless, for reasons such as great distance, it is impossible for parents or eligible students to review the records. Schools may charge a fee for copies.

Parents or eligible students have the right to request that a school correct records which they believe to be inaccurate or misleading. If the school decides not to amend the record, the parent or eligible student then has the right to a formal hearing. After the hearing, if the school still decides not to amend the record, the parent or eligible student has the right to place a statement with the record setting forth his or her view about the contested information.

Generally, schools must have written permission from the parent or eligible student in order to release any information from a student's education record. However, FERPA allows schools to disclose those records, without consent, to the following parties or under the following conditions (34 CFR § 99.31):

## FERPA Procedure

- **Responsibilities:**
  - Admission Administrator
    - To ensure that all students understand the FERFP form during the enrollment agreement and have all students completed a FERPA form during the enrollment process.
  - School Director or Designee
    - To annually release the FERPA form to all current students notifying them of their option to change or update their FERPA information. During this time, they are also updated on their FERPA rights.
    - Employees are also given an in-service on FERPA, students' rights, confidentiality and the policy of the FERPA.

# Safeguarding Consumer Information (PII)

## Safeguarding Consumer Information Policy

The school establishes and maintains a comprehensive information security program. This program must include the administrative, technical, or physical safeguards the school uses to access, collect, distribute, process, protect, store, use, transmit, dispose of, or otherwise handle customer information. The safeguards achieve the following objectives:

- Insures the security and confidentiality of customer information
- Protects against any anticipated threats or hazards to the security or integrity of such information, and

Protects against unauthorized access to or use of such information that could result in substantial harm or inconvenience to any customer

## Safeguarding Consumer Information Procedure

- **Responsibilities:**
  - **School Director**
    - Oversees and manage the employee training and management of information systems of storage and transmittal of confidential information.
    - Will change password codes monthly to programs such as Online testing system (if applicable) and share with staff members who need access to the system.
  - **All staff**
    - Will ensure that all documents containing student grades, Social Security, or personal information are shredded-(shredder located in Financial Aid office)
    - Will ensure that all passwords are secure and will not share their password codes with other members of the team or outside of the team.
    - Will remember to log out of all computers and programs that allows access to exams and grades.

## Net Price Calculator

### Net Price Calculator Policy

Northern Technical College set up a Net Price Calculator template, so the institution can use to comply with one of the new requirements that was created in the Higher Education Opportunity Act of 2008. Title IV institutions are required to post a net price calculator on Northern Technical College Website. Northern Technical College now has a Net Price Calculator that uses institutional data to provide estimated net price information to current and prospective students. The school's website is [jsbarbercollege.com](http://jsbarbercollege.com). The estimates that are generated by the calculator do not represent a final determination or award financial assistance or final price by the school. Rather, they are only estimated based on the cost of attendance and financial aid provided to students in any given year.

HEOA states, "The calculator shall be developed in a manner that enables prospective students, families and consumers to determine an estimate of a prospective student's individual net price at a particular institution."

The Calculator template has eight elements for the students to enter:

- Age
- Marital Status
- Family Size
- Number of family members in college
- Parents income for dependents (or household income for independents)
- Living status (on campus, off campus, or with parents)
- Residency Status (in-state or out of state)

The following is the data that the institutions must provide to populate the calculator. The institution can add data to provide a more accurate estimate of their net price. At a minimum each institution can add data to provide a more accurate estimate of their net price. A minimum each institution must provide the following data:

- Estimated total price of attendance
- Estimated tuition and fees
- Estimated room and board
- Estimated books and supplies
- Estimated other expenses (including personal expenses and transportation)
- Total estimated merit- and need-based grant aid
- Estimated net price (price of attendance minus grant aid)

The institution uses the department of education calculator. The institution should update their calculator basis when new data becomes available. The institution should update their calculator on an annual basis when new data becomes available. An institution that has any full-time, first-time students, no matter how few, must have a net price calculator.

•How It Works –Institutions input the following data: •Price of attendance •Median amounts of grant and scholarship aid awarded to, and accepted by, first-time, full-time degree/certificate-seeking students by EFC range –Users are asked nine questions to establish the following: •Their dependency status •Their estimated cost of attendance •Approximated EFC

•How It Works –The template uses a lookup table populated with data from the FAFSA applications database to identify a median EFC –Median EFC is matched with the median grant and scholarship aid amount entered by the institution for the corresponding EFC range to determine the student's estimated amount of total grant aid –Estimated net price is calculated by subtracting estimated total grant aid from the estimated total price of attendance Net Price Calculator Template.

## Net Price Calculator Procedures

- Responsibilities
  - Financial Administrator
    - Create Net Price Calculator
    - Work with liaison/director to into data
    - Counselor incoming students to view the Net Price Calculator
    - Up date the Net Price Calculator annually
  - School Director
    - Make sure the Net Price Calculator is updated

# Data Security Breach and Self-Report of Data Breach Requirements (PII requirements)

## Policy

Upon signing a Program Participation Agreement (PPA), Northern Technical College agreed to comply with the Family Educational Rights and Privacy Act (FERPA), the U.S. Department of Education's implementing regulations at 34 C.F. R. Part 99, and the Standards for Safeguarding Customer Information, 16 C.F.R. Part 314, issued by the Federal Trade Commission (FTC), as required by the Gramm-Leach-Bliley (GLB) Act, P.L. 106-102. Northern Technical College is responsible for complying the limitations on the disclosure of PII in students' education records under FERPA and is subject to Sections 501 and 505(b)(2) of the GLB Act.

The GLB Act, also known as the Financial Services Modernization Act of 1999 (Public Law # 106-102, 113 Statute 1338), regulates the collection, disclosure, and protection of consumers' nonpublic personal information or personally identifiable information (PII) by financial institutions. Section 501 of GLB Act established the following information security standards for financial institutions:

NTC shall establish appropriated standard for the institution relating to administrative, technical, and physical safeguards-

- (1) To ensure the security and confidentiality of students and employees records and information
- (2) To protect against any anticipated threats or hazards to the security or integrity of such records; and
- (3) To protect against unauthorized access to or use of such records or information which could result in substantial harm or inconvenience to any student or employee.

### Program Objectives:

The objectives of this Information Security Program ("Program") are as follows:

- Insure the security and confidentiality of the institution students and employee's information.
- Protect against any anticipated threats or hazards to the security and/or integrity of the institution's Student's and employee's information.
- Protect against unauthorized access to or use of the Institution's students and employee's information that could result in substantial harm or inconvenience to any customer.

### Purpose

For purposes of the Security of NTC Program, "student information" means any information about a Student's and/or employee's, or information the institution receives about the student of another financial institution, that can be directly or indirectly attributed to the student. This Security Program, in and of itself, does not create a contract between the student and any person or entity.

### Responsibilities:

#### Program Coordinator(s)

This Program and the safeguards it contemplates shall be implemented and maintained by an employee or employees ("Program Coordinator") designated by the institution's Director. The Program Coordinator shall design, implement and maintain new safeguards as he or she determines to be necessary from time to time. The Program Coordinator shall report to the Director and team members who have responsibility for overseeing the Program. The Program Coordinator may delegate or outsource the performance of any function under the Information Security Program as he or she deems necessary from time to time.

In the event the Program Coordinator leaves the employment of the Institution, the Director, shall take over the responsibilities of the Program Coordinator until a new Program Coordinator is designate.



## Procedures

1. All records containing customer information shall be stored and maintained in a secure area.

- Paper records shall be stored in a room, cabinet, or other container that is locked when unattended. The Director and Program Coordinator shall control access to such areas.
- All storage areas shall be protected against destruction or potential damage from physical hazards, like fire or floods.
- Electronic customer information shall be stored on secure servers. Access to such information shall be password controlled, and the Program Coordinator shall control access to such servers.
- Student and employee information consisting of financial or other similar information (e.g., social security numbers, etc.) shall not be stored on any computer system with a direct Internet connection.
- All customer information shall be backed up on a [daily] basis. Such backup data shall be stored in a secure location as determined by the Program Coordinator.

2. All electronic transmissions of student and employee information, whether inbound or outbound, shall be performed on a secure basis.

- Social Security, IRS information, or other sensitive financial data transmitted to the Institution directly from students shall use a secure connection, such as a Secure Sockets Layer (SSL) or other currently accepted standard, so that the security of such information is protected in transit. Such secure transmissions shall be automatic. Students shall be advised against transmitting sensitive data, like social security, via electronic mail.
- The Institution shall require by contract that inbound transmissions of student information delivered to the Institution via other sources be encrypted or otherwise secured.
- All outbound transmissions of student information shall be secured in a manner acceptable to the Program Coordinator.
- To the extent sensitive data must be transmitted to the Institution by electronic mail, such transmissions shall be password controlled or otherwise protected from theft or unauthorized access at the discretion of the Program Coordinator.
- The Program Coordinator and third party service shall review all students' applications to ensure an appropriate level of security both within the Institution and with the Institution's business third party server and IRS.

3. All paper transmissions of customer information by the Institution shall be performed on a secure basis.

- Sensitive student information shall be properly secured at all times.
- Student information delivered by the Institution to third parties shall be kept sealed at all times. • Paper-based student information shall not be left unattended at any time it is in an unsecured area.

4. All student information shall be disposed of in a secure manner.

- The Program Coordinator shall supervise the disposal of all records containing student information.

- Paper based student information shall be shredded and stored in a secure area until a disposal or recycling service picks it up.
  - All hard drives, diskette, magnetic tapes, or any other electronic media containing student information shall be erased and/or destroyed prior to disposing of computers or other hardware.
  - All hardware shall be effectively destroyed.
  - All student information shall be disposed of in a secure manner after any applicable retention period.
5. The Program Coordinator shall maintain an inventory of Institution computers, including any handheld devices or PDAs, on or through which student information may be stored, accessed or transmitted.
6. The Program Coordinator shall develop and maintain appropriate oversight or audit procedures to detect the improper disclosure or theft of student information.

## **Information Security Policies and Procedures**

Detecting, Preventing and Responding to Attacks, Intrusions or Other Systems Failures In keeping with the objectives of the Program, the Institution shall implement, maintain and enforce the following attack and intrusion safeguards:

Norton Anti-Virtus (School)

iBackup (School)

FAME-utilizes Educational Compliance Management school interface that is encrypted. The school must be secured with a unique login ID and password for access to systems.

1. The Program Coordinator shall ensure the Institution has adequate procedures to address any breaches of the Institution's information safeguards that would materially impact the confidentiality and security of customer information. The procedures shall address the appropriate response to specific types of breaches, including hackers, general security compromises, denial of access to databases and computer systems, etc.
2. The Program Coordinator shall utilize and maintain a working knowledge of widely available technology for the protection of student information.
3. The Program Coordinator shall communicate with the Institution's computer vendors from time to time to ensure that the Institution has installed the most recent patches that resolve software vulnerabilities.
4. The Institution shall utilize anti-virus software that updates automatically.
5. The Institution shall maintain up-to-date firewalls.
6. The Program Coordinator shall manage the Institution's information security tools for employees and pass along updates about any security risks or breaches.
7. The Program Coordinator shall establish procedures to preserve the security, confidentiality and integrity of student information in the event of a computer or other technological failure.

8. The Program Coordinator shall ensure that access to student information is granted only to legitimate and valid users.

9. The Program Coordinator shall notify students promptly if their student information is subject to loss, damage or unauthorized access.

## Disbursement For Books & Supplies

### Disbursement for Books & Supplies Policy

#### Special provisions for books and supplies: 34 CFR 668.164(m)

In order to academically succeed in a program, a student must be able to purchase books and supplies at the beginning of the academic period. Therefore, by the seventh day of a payment period, a school must provide a way for a student who is eligible for FSA (PELL) funds to obtain or purchase the books and supplies required for the payment period if

- ◆ ten days before the beginning of the payment period, the school could have disbursed FSA funds to the student; and
- ◆ disbursement of those funds would have created an FSA credit balance.

The institution must consider all the FSA funds a student is eligible to receive at the time it makes the determination, but the school need not consider aid from non-FSA sources.

The institution includes the costs of books in the tuition charged and provides all of the books to the students at the start of his or her classes meets the requirement of these regulations. On the seventh day of a payment period, the institution will provide a way for a student who is eligible for PELL funds to obtain required supplies.

The amount a school must provide is the lesser of the presumed credit balance or the amount determined by the school that the student needs to obtain the books and supplies. In determining the required amount, a school may use the actual costs of books and supplies or the allowance for those materials used in estimating the student's cost of attendance for the period.

The student has the right to "opt out" to participate in the process the school provides for the student to obtain or purchase books and supplies.

If a student uses the method provided by the school to obtain or purchase books and supplies, the student is considered to have authorized the use of FSA funds, and the school does not need to obtain a written authorization for this purpose.

Authorization not required if a Pell-eligible student uses the process provided by the school to obtain books or supplies, the student is considered to have authorized the use of the FSA funds, and no written authorization is required.

Effect of Verification to be eligible to receive the disbursement for books and supplies, a student must meet all the student eligibility requirements before the start of the student's payment period.

A student who has not completed the verification process, has an unresolved "C" code on the SAR and ISIR, or has unresolved conflicting information is not covered by the special provisions for books and supplies if those issues have not been resolved at least 10 days before the start of the student's payment period.

### **30-day Delay Requirement**

If the 30-day delayed disbursement provisions for Direct Loans apply to a student, and a Direct Loan is the only Title IV aid the student is receiving, a school does not have to comply with the provisions of 34 Clarification

A school is required to provide, in its financial aid information and its notifications provided to students receiving FSA funds, information on the way the school provides for Federal Pell Grant eligible students to obtain or purchase required books and supplies by the seventh day of a payment period under certain conditions and how the student may opt out. The information must indicate whether the school will enter a charge on the student's account at the school for books and supplies or pay funds to the student directly. Also, during the financial aid counseling process, the school must explain to a student who qualifies for the funds advanced to purchase books and supplies how the method is handled at the school and how a student may opt out.

## **Disbursement for Books & Supplies Procedures**

### **Responsibilities**

- Financial Aid Administrator
  - Pell eligible students are able to receive their books and supplies by the 7<sup>th</sup> day of the payment period
  - Make sure the cost of books and supplies are included in the tuition to obtain and purchase books and supplies during the first pay period
  - Students must meet all the eligibility requirement to obtain books and supplies by the special provisions for books and supplies
  - A student during the counseling process, must be informed about the funds advanced to purchase books and supplies how the method is handled at the school and how a student may opt out.
  - Authorization is not required if a student use the school's method to obtain books and supplies
- Business Office Administrator
  - Make sure the monies are available with 7 days of the payment period

## **Clery Information**

### **Safety and Security Annual Survey**

#### **Safety and Security Annual Survey Policy**

In 1990, Congress enacted the Crime Awareness and Campus Security Act of 1990 (Title II of Public Law 101-542), which amended the Higher Education Act of 1965 (HEA). This act required all

postsecondary institutions participating in HEA's Title IV student financial assistance programs to disclose campus crime statistics and security information. The act was amended in 1992, 1998, 2000 and 2008.

Under the Clery Act, the on-campus category includes the following: Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, including residence halls; and Any building or property that is within or reasonably contiguous to the area identified in paragraph (1) of this definition, that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor).

*U.S. Department of Education, Office of Postsecondary Education, The Handbook for Campus Safety and Security Reporting, 2016 Edition, Washington, D.C., 2016.*

Northern Technical College strictly maintains and enforces the safety and security of the campus population. Northern Technical College complies with safety and security guidelines as requested and suggested by the Crime Awareness and Security Act of 1990; The U.S Department of Education; State and Local Laws and local law enforcement agencies; and various publications. Northern Technical College strictly forbids the possession of firearms or other weapons on school property or during school related outings. Northern Technical College has zero tolerance policy regarding immoral conduct and enforces campus safety and security regulations pertaining to verbal, sexual, and physical harassment of a fellow student or staff member as well as threat of physical violence against a fellow student or staff member.

## Procedure

### Responsibilities:

- School Director
  - Appoint a Campus Security Awareness(CSA) Coordinator and CSA Team
  - Oversee the CSA Coordinator and Team
  - All incidents are evaluated by School Director and/ or CSA Coordinator
  - Criminal incidents may be turned over to local authorities for further investigations.
  - Due to the nature of the incident other sanctions may be implemented on the accused or the accuser.
  - School must distribute by October 1 each year, a security report.
  - The security report will be posted on the class bulletin.
  - Yearly a one (1) hour presentation will be held in the spring to address dating violence, domestic violence, sexual assault, and stalking.
  - Campus Security Awareness Coordinator
  - Perform yearly trainings for the CSA team's members on Crime Logs and Emergency Reporting (ER) procedures
  - Submit the Crime Logs to School Director and alert Campus Director of all criminal activities.

## Updating Clery

## Policy

The campus crime statistics is updated yearly and is made available to all prospective students, current employees, and current students. Copies of this information are duplicated and may be found available at any time. They are located:

- [www.northerntechnicalcolleges.com](http://www.northerntechnicalcolleges.com)
- Student break area on the bulletin board/student classroom

## Procedure

### Responsibilities:

- Admission Administrator
  - Alert the perspective student of the report during the enrollment process through the enrollment packet.
- Admission/Financial Administrator
  - Alert current students of the report and its components and location on the campus and the website.
  - Have students complete an acknowledgment form
- School Director
  - Contact local police department with a formal request via email or postal mail service requesting a crime report for the geographical location of Northern Technical College for previous year. (if we are in 2018 we should request information for 2017 ).
  - Send out notifications to all employees and students of the newly reported report via email and text messaging
  - Release the report by Oct. 1 of each year.

# Violence Against Women Act (VAWA)

## Violence Against Women Act Policy

On March 7, 2013, President Obama signed the Violence Against Women Reauthorization Act of 2013 (VAWA) (Pub. Law 113-4). The HEA defines the new crime categories of domestic violence, dating violence, and stalking in accordance with section 40002(a) of the Violence Against Women Act of 1994 as follows:

“Domestic violence” means a “felony or misdemeanor crime of violence committed by—

- A current or former spouse or intimate partner of the victim,
- A person with whom the victim shares a child in common,
- A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner,
- A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies [under the VAWA],
- Any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction”

**In the event of a crime act of this nature, all information will be held in the strict confidence. Only information pertain to the incident will be disclosed to the personnel or law enforcement on an as**

**needed basis. The victim must sign a FERPA to release information to other parties (family members etc.).**

Northern Technical College is committed to providing options, support and assistance to victims/ survivors of sexual assault, domestic violence, dating violence, and stalking

## Procedure

- **Responsibilities:**
- School Director, In the absence of the School Director, individuals should seek out any Northern Technical College staff member.
  
- The Institution encourages all students and employees to be responsible for their own security and the security of others. Please report any known criminal offenses occurring on campus to the school administration.
- In the event a sex offense should occur on campus; the victim should take the following steps:
  - Report the offense to the school administration.
  - Preserve any evidence as may be necessary to the proof of the criminal offense.
  - Request assistance, if desired, from school administration in reporting the crime to local law enforcement agencies.
  - Request a change in the academic situation if necessary.

# VAWA Disciplinary Hearings

## VAWA Disciplinary Hearings Policy

Campus disciplinary action in cases of alleged sexual assault will be based on the findings of the law enforcement agency investigating the facts pertaining to the crime and other mitigating circumstances.

These records are available upon request through the administrative offices.

Information for crime victims about disciplinary proceedings. The institution will, upon written request, disclose to the alleged victim and the accuser of any crime of violence, or a non-forcible sex offense, (alleged dating violence, domestic violence, sexual assault, or stalking as defined in 34 CFR 668.46(a) the results of any disciplinary proceedings conducted by the institution against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased because of the crime or offense, the information shall be provided, upon request to the next of kin of the alleged victim. This provision applies to any disciplinary proceeding conducted by the institution on or after August 14, 2009.

The institutions will provide a prompt, fair, and impartial disciplinary proceeding in which

- (1) officials are appropriately trained conflict of interest or bias for or against the accuser or the accused;
- (2) the accuser and the accused have equal opportunities to have others present, including an advisor of their choice;
- (3) the accuser and the accused receive simultaneous notification, in writing, of the result of the proceeding and any available appeal procedures;

- (4) the proceeding is completed in a reasonably prompt timeframe;
- (5) the accuser and accused are given timely notice of meetings at which one or the other or both may be present; and
- (6) the accuser, the accused, and appropriate officials are given timely access to information that will be used after the fact-finding investigation but during informal and formal disciplinary meetings and hearings.

## VAWA Disciplinary Hearings Procedure

- **Responsibilities:**
  - Student
    - Formal complaint via writing, video, or verbally
    - Accuser will be notified in writing or verbally of alleged crime
  - School Director
    - Report allegation to official authorities at Northern Technical College and/ or law enforcement (may be optional)
    - Northern Technical College and/or Law enforcement conducts a full investigation of allegations along with collection of evidence
    - Possible sanctions during investigation may include suspensions, Leave of Absence, or change in program section until investigation is complete.
    - Victim may have the option of utilizing Victim Rights (see rights on Financial Aid website)
    - Based on the findings made by law enforcement or Northern Technical College, a written notice will be issued to the accuser and the victim of the outcome.

# VAWA Collecting Data

## VAWA Collecting Data Policy

Campus Security Awareness Team members are defined as an individual or individuals who have responsibility for campus security but who do not constitute a campus police department or campus security department. CSA's Coordinator and/ or team members are responsible for documenting all crimes on official log and reporting them to the CSA Coordinator. These individuals collect data throughout the year on activities that fall under the VAWA and Campus Crime Reports. They are assigned by the School Director.

## VAWA Collecting Data Procedure

- **Policy:** See above policy
- **Purpose:** To gather data and documentation of crimes.
- **Responsibilities:**
  - Campus Security Awareness Team
    - Collect data yearly via Crime logs
    - Submit logs to School Director monthly
  - School Director
    - Reviews the logs
    - Ensures that all incidents have been reported to local officials



- Contacts the local law enforcement by July each year via email for the information for the annual report
- Compile the information for the annual report
- Updates the information
- Submits by October 1 to Clery department, current students, and employee

## VAWA Prevention and Awareness

### VAWA Prevention & Awareness Policy

Northern Technical College will conduct yearly school wide event each Spring that incorporates information on the Sexual Violence and Violence Against Women. It offers resources and information on how to protect and protect others who may be a victim of criminal activity.

### VAWA Prevention & Awareness Procedure

- **Responsibilities:**
  - Financial Aid Administrator
    - Contacts the local battered women’s shelter or qualified counselor to schedule a presentation to address the students during an assembly.
    - Place order to any promotional items at least a month in advance, if desired
    - Ensure that each students and employee signs the sign in sheet.
  - Instructors
    - Prepare lesson plans to incorporate 1 hour for a presentation on Sexual Violence and Violence Against Women
  - Campus Director
    - Keeps copies of sign in sheets and documents of presentation in Director’s office.

## Emergency Response & Evacuation Procedures FSA Assessments

### Emergency Response & Evacuation Procedures FSA Assessments Policy

During an emergency evacuation, each instructor is responsible for the safe and orderly evacuation of his/her class. Instructors not in class should assist with any evacuation problems that may arise. It is the instructor’s responsibility to prevent panic, control traffic, and provide calm leadership. The following guidelines should be observed:

## Emergency Response & Evacuation Procedures FSA Assessments Procedure

- **Responsibilities:** This policy is the primary duty of all employees on staff

### Fire

- All parties are notified of a Fire Emergency by the building fire alarm/ and or verbal drill
- All Instructors are to immediately obtain Walkie Talkies/ and/ or announce verbally and begin vacating from the building
- All instructors and students are to immediately exit to the nearest and safest exit door.
- Once all persons exit, everyone should move to the parking lot away from the building.
- Instructors should immediately take role to ensure all students are accounted for using Northern Technical College walkie talkies and/ or gradebooks.
- Once emergency staff gives clearance, all parties will be allowed to exit or enter into the building.

### Weather

- All instructors and staff members should move to the middle of building away from all windows. This procedure should be done until all is clear it is safe to either exit the building or return to designated classroom.

## Timely Warning & ER Notifications

### Timely Warning & ER Notifications Policy

Timely warnings are issued at the discretion of Northern Technical College and the nature of the incident. Notification of these warning may be communicated via email, institutional texting system, letter, or phone.

A school must, in a manner that is timely and will aid in the prevention of similar crimes, report to the campus community on crimes that are included in campus crime statistics, such as arson, robbery, burglary, motor vehicle theft, aggravated assault, criminal homicides, and sex offenses if it represent a treat to students and employees.

If there is an immediate threat to the health or safety of students or employees occurring on campus, the institution must follow its emergency notification procedures. If Northern Technical College follows its emergency notification procedures, the institution not required to issue a timely warning based on the same circumstances; however, the school must provide adequate follow-up information to the community as needed.

## Timely Warning & ER Notifications Procedure

- **Responsibilities:**
  - School Director
    - Will issue a timely warning in the event of emergency situations via text and voice messages through Northern Technical College email and/or phone.
    - Will issue Test text and voice notifications via twice a year. This will be conducted once in the Spring and once in the Summer
      - Student will be notified of the test 1 week prior to the test
      - If the test is unsuccessful,
  - Students
    - If the test is unsuccessful, the students will notify the Director to update or trouble shoot reason for failed test.
  - Financial Aid Administrator
    - Will update the student's record
    - Notify the School Director of the update via private message
  - School Director
    - Submit an additional timely notification test to students who updated their information.

## Drug & Alcohol Abuse Prevention Program

### Drug & Alcohol Abuse Prevention Program Policy

Northern Technical College will annually make available and/or distribute in writing to each student and each employee the following:

- Standards of conduct that clearly prohibit the unlawful possession, use or distributing of illicit drugs and alcohol by students and employees on the school's property or as part of any of the school's activities
- Descriptions of applicable sanctions under state, local, and federal law (student handbook)
- Description of health risks
- Description of available counseling, treatment, rehabilitation, or re-entry programs.

Northern Technical College is designated as Drug Free Zones that assures compliance with Public Law 101-226. The school abides by all state, federal, and local laws pertaining to alcohol and will enforce underage drinking laws. It is unlawful to possess, use, or distribute illicit drugs on Northern Technical College property or at any school sponsored event located on the property or any other property. Northern Technical College prohibits the consumption, possession, or distribution of alcohol on school grounds.

Smoking is not permitted in any classroom or other facility that any is required to occupy, or which is occupied by students, faculty, staff and/or administrator. Smoking is only allowed at locations outside the main building in the designated smoking areas.

Northern Technical College believes that the impairment of any employees and/or students due to his or her use of illegal drugs or due to alcohol abuse is likely to result in the risk of injury to others, the impaired employee, and student or to third parties, such as clients or business guest. "Impairment" or "being impaired" means that a person's normal physical or mental abilities or faculties while at work have been affected by the use of illegal drugs or alcohol.

The impairment of students or employees while at work is guilty of a major violation of the school policy and is subject to severe disciplinary action. Severe disciplinary action can include suspension, dismissal or any other penalty appropriate under the circumstances. The use, possession, transfer or sale of any illegal drugs on campus premises or in any Northern Technical College site is prohibited. If any student and/or employee violate this rule are subject to severe disciplinary action. All disciplinary actions will be administered at the sole discretion and determination of Northern Technical College. When there is a violation of this policy Northern Technical College may notify appropriate authorities. Such notice will be given "only" after such an incident has been investigated and reviewed by the Administration and/or Owner of J's Barber.

### **SCHOOL SANCTIONS**

Violation of school drug/alcohol by students, faculty, or staff will result in disciplinary action. The disciplinary action could be a written reprimand, suspension, dismissal, reduction in pay, expulsion, or termination. This is for students and/employee accordance to the School's Code of Conduct policy. All illegal activities of substance abuse/ and/ or alcohol could result in criminal prosecution as well, under state and federal laws, including section 22 of the Drug Free Schools and Campuses Act Amendment of 1989 (Public Law of 101226).

### **LEGAL SANCTIONS**

In Arkansas, it is unlawful to produce, manufacture, distribute, dispense, or possess illegal drugs. The most common illegal drugs on college campuses are marijuana, opium derivatives, hallucinogens, depressants, cocaine, cocaine derivatives, and amphetamines. The Criminal Code of Arkansas carries specific penalties for the possession and use of illegal drugs. Arkansas Revised Statue 40:891.3, Violation of Uniform Controlled Dangerous Substances Law; Drug Free Zone, states that any person who violates a provision of the Uniform Controlled Dangerous Substances Law (Arkansas Revised Statute 40:966 through 970) while on any property used for school purposes by any school, within two thousand feet of any such property, or while on a school bus, shall, upon conviction, be punished by the imposition of the maximum fine and be imprisoned for not more than one and one-half times the longest term of imprisonment authorized by the applicable revisions of R.S. 40:966 through 970 of the Uniform Controlled Dangerous Substances Law. It is also unlawful in Arkansas for anyone under 21 years of age to purchase or possess any alcoholic beverages for any reason, in any place open to the public. Exceptions occur when the alcohol is possessed or consumed

for the following reasons: for established religious purposes; for medical purposes when prescribed by a licensed authority; when an 18-20-year-old is accompanied by a parent, spouse, or legal guardian at least 21 years of age; in private residences or private clubs or establishments when lawfully employed by a licensed enterprise for the lawful sale, handling, transport or dispensing of alcohol beverages. In accordance with Arkansas Revised Statute 14:98, Operating a Vehicle While Intoxicated, driving under the influence of alcohol is illegal in Arkansas, and anyone with a blood alcohol concentration of .08 or above will be charged with driving while intoxicated (DWI) or driving under the influence (DUI).

## Drug & Alcohol Abuse Prevention Program Procedure

### Responsibilities:

- Administrator
  - Place order to any promotional items at least a month in advance
  - Place order or obtain literature to validate information in the PowerPoint
  - Make available to students, the Northern Technical College Drug and Alcohol handbook on the Financial Aid bookshelf
  - Ensure that each students and employee signs the sign in sheet.
- Instructor
  - Present the PowerPoint during a school wide assembly and or provide a guest speaker to present to the students.
  - Ensure that lesson plans include 1 hour of presentation time for the school wide presentation.
- School Director
  - Ensure that event take places every year before July 1
  - Ensure that above documents are issued to all students and employees
  - Ensure that Northern Technical College Presentation survey is issued to all students and employees

## Biennial Review

### Biennial Review Policy

Northern Technical College makes available upon request to the Department of Education and to the public, the information distributed to students and employees and the results of the biennial review of Northern Technical College program that:

- Determines the effectiveness of the program and implements needed changes
- Determines the number of drug and alcohol related violations and facilities that occur on the school's campus or as part of the school's activities, and are presented to Northern Technical College administrative staff.
- Determines the number of and type of sanctions that are imposed
- Ensures that sanctions are consistently enforced.

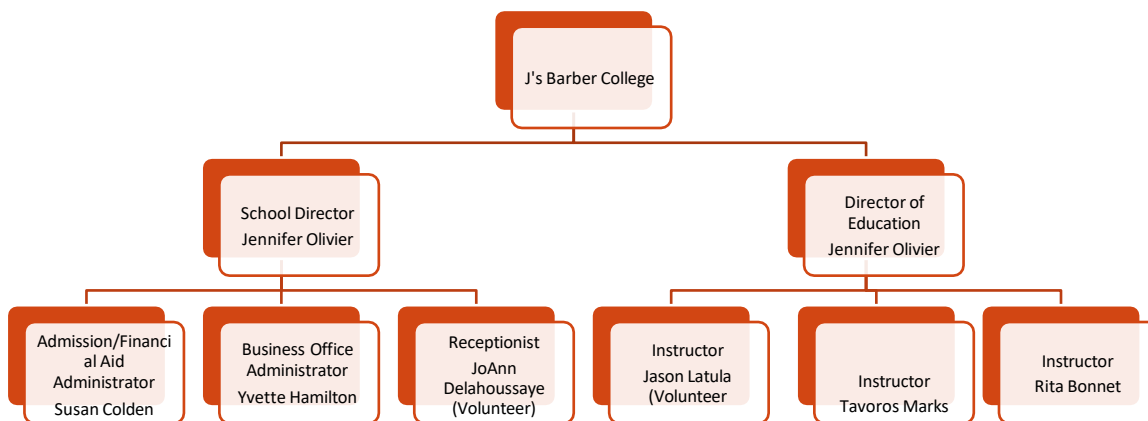
### Biennial Review Procedure

- **Responsibilities:**

- School Director and assigned staff members
  - On the odd years, during the 2<sup>nd</sup> Quarter by July 1<sup>st</sup> a review of the Drug and Alcohol handbook will take place updating all needed changes; the first review is schedule in 2019 every 2 years
  - The updated review will be posted on school’s website, school student break area, and at the financial aid office
  - An updated copy will be available upon a request to all current employees and students’ handbook

## Title IV, Funding HEA Topics

### Organizational Chart



## Calculating Pell Grant and other FSA for adds or drops a crossover class

### Calculating Pell Grant and other FSA for adds or drops a crossover class Policy

Students who fall within the crossover period must complete the new award year FASFA for the new award year.

**Northern Technical College** measures progress in Clock Hours, and used the Payment Period for the period of calculation.

#### **CALCULATION FORMULA:**

The formula determines the amount of Title IV Aid that was disbursed plus Title IV that could have been disbursed.

Calculate the percentage of Title IV Aid earned:

- a. Divide the number of clock hours scheduled to be completed in the payment period as of the last date of attendance in the payment period by the total clock hours in the payment period.

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

- b. If this percentage is greater than 60 %, the student earns 100%.
- c. If this percent is less than or equal to 60%, proceed with calculation.
  - Percentage earned from (times) total aid disbursed, or could have been disbursed = **Amount Student Earned.**
  - Subtract the Title IV aid earned from the total disbursed = Amount to be Returned.
  - 100% minus percent earned = **Unearned Percent**
  - Unearned percent (multiplied by) total institutional charges from the period = **Amount Due from the School.**

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

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

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

## **Calculating Pell Grant and other FSA for adds or drops a crossover class Procedure**

- Responsibilities:
  - Financial Aid Administrator
    - Completed the new award year FAFSA
    - Bring in updated supporting documentation
    - If required complete verification forms
    - Meet with students about new award year information

# **Entrance Counseling**

## **Entrance Counseling Policy**

Entrance Counseling is required before you can receive your first Direct Subsidized Loan, or Direct Unsubsidized Loan as an undergraduate, or your first Direct PLUS Loan as a graduate/professional student.

If you're a student and have not previously received a subsidized/unsubsidized loan or PLUS loan (graduate/professional students only) under the Direct Loan Program or Federal Family Education Loan (FFEL) Program, you must complete entrance counseling for that loan type before receiving a loan to ensure that you understand your responsibilities and the obligations you're assuming.

Documentation of approval and any prior approvals of Title IV funds will be available for review from the National Student Loan Data System (NSLDS). This includes previously received Title IV or a transcript, or other documentation from a previous institution that demonstrates Title IV enrollment.

A counseling session will take 20-30 minutes to complete. You must complete the counseling in a single session. You cannot save a partially completed counseling session.

## Entrance Counseling Procedure

### Responsibilities:

- **Financial Aid Administrator:**
  - Contact student via mail or phone to complete Entrance Counseling
  - A counseling session will take 20-30 minutes to complete. You must complete the counseling in a single session.
  - Inform Student Entrance Counseling is required before you can receive your first Direct Subsidized Loan, or Direct Unsubsidized Loan as an undergraduate, or your first Direct PLUS Loan as a graduate/professional student.
  - Print a copy of the Entrance Exam for the FA file

## Exit Counseling for student who unofficial withdrawal

### Exit Counseling for student who unofficial withdrawal Policy

Entrance Counseling is required before you can receive your first Direct Subsidized Loan, or Direct Unsubsidized Loan as an undergraduate, or your first Direct PLUS Loan as a graduate/professional student.

If you're a student and have not previously received a subsidized/unsubsidized loan or PLUS loan (graduate/professional students only) under the Direct Loan Program or Federal Family Education Loan (FFEL) Program, you must complete entrance counseling for that loan type before receiving a loan to ensure that you understand your responsibilities and the obligations you're assuming.

Documentation of approval and any prior approvals of Title IV funds will be available for review from the National Student Loan Data System (NSLDS). This includes previously received Title IV or a transcript, or other documentation from a previous institution that demonstrates Title IV enrollment.

A counseling session will take 20-30 minutes to complete. You must complete the counseling in a single session. You cannot save a partially completed counseling session.



## Exit Counseling for student who unofficial withdrawal Procedure

### Responsibilities:

- **Financial Aid Administrator:**
  - Contact student via mail or phone to complete Entrance Counseling
  - A counseling session will take 20-30 minutes to complete. You must complete the counseling in a single session.
  - Inform Student Entrance Counseling is required before you can receive your first Direct Subsidized Loan, or Direct Unsubsidized Loan as an undergraduate, or your first Direct PLUS Loan as a graduate/professional student.
  - Place a copy of the Exit copy in the Financial Aid folder

## Loan Deferments

### Loan Deferments Policy

Under certain circumstances, you can receive a *deferment* or *forbearance* that allows you to temporarily postpone or reduce your *federal student loan* payments. Postponing or reducing your payments may help you avoid *default*.

You'll need to work with your *loan servicer* to apply for deferment or forbearance; and be sure to keep making payments on your loan until the deferment or forbearance is in place.

A deferment is a period during which repayment of the *principal* and interest of your loan is temporarily delayed.

During a deferment, you do not need to make payments. What's more, depending on the type of loan you have, the federal government may pay the interest on your loan during a period of deferment.

The government may pay the interest on your

- *Federal Perkins Loan*,
- Direct *Subsidized Loan*, and/or
- Subsidized Federal Stafford Loan.

The government does not pay the interest on your unsubsidized loans (or on any PLUS loans). You are responsible for paying the interest that accrues (accumulates) during the deferment period, but your payment is not due during the deferment period. If you don't pay the interest on your loan during deferment, it may be capitalized (added to your principal balance), and the amount you pay in the future will be higher.

### Loan Deferments Procedure

- **Responsibilities:**
  - Financial Aid Administrator
    - In School Deferment Request
      - If the student had a Direct Loan at a previous school they attended, they can request a deferment while attending your school. If the student had a loan from a bank or other lender the student has to get the deferment form from their lender. The student fills out their part and Northern Technical College will complete its part and send it in.
  - Out of school Deferment Request
    - Most deferments are not automatic, and you will likely need to submit a request to your loan servicer, the organization that handles your loan account. If you are enrolled in school at least half-time and you would like to request an in-school deferment, you'll need to contact your Northern Technical College financial aid office as well as your loan servicer.
    - Your deferment request should be submitted to the organization to which you make your loan payments.
      - Direct Loans and FFEL Program loans: contact your loan servicer

## Organizational Structure- Business Office and Financial Aid Office

### Organizational Structure- Business Office & Financial Aid Office Policy

Northern Technical College has 2 main departments, Business, Admission/Financial Aid.

- The Business department includes Institutional Eligibility. It maintains recertification, and all administration capabilities. It manages and consumer information, Fiscal Management, and reporting and reconciling monthly financial reports, return to FSA funds.
- The Admission/Financial Aid department handles enrollment and student eligibility.
- The Financial aid office determines Title IV student eligibility, handles the Default Management Prevention.
- The Education Department provides educational tools and resources to students for completion of program, success and transition.
- School Director makes sure the financial Aid program is in compliance with regulations

### Organizational Structure- Business Office and Financial Aid Office Procedure

- **Policy:** See above policy
- **Purpose:** To become familiar with the organization structure of business and financial aid offices.
- **Responsibilities:**
  - **Admission/Financial Aid Administrator**  
Work with the Business Administrator and Financial Aid Management Education (FAME) to process the Federal Financial Aid PELL grants and loans.
  - **Business Office Administrator**

Work with Financial Aid Administrator, FAME, and School Director with the disbursement of Financial Aid funds.

Fiscal Management, Reporting and reconciling monthly financial reports and returns of FSA funds.

- **School Director**

Makes sure the Financial Aid Programs are in compliance with the federal regulations set forth by the State Department of Education

## Cost of Attendance Budget for all Programs

### Cost of Attendance Budget for all Programs Policy

Northern Technical College calculates the COA (cost of attendance) based on the individual student Federal Student Aid non-need-based on award eligibility, the student's program, and dependency status. The remaining FSA need based award eligibility is calculated based on the student's COA minus Economic Family Contribution (EFC). COA is documented individually in the enrolled student's files upon receipt of a valid Institution Student Report (ISIR) from the United State Department of Education. Cost of Attendance is provided to prospective or enrolled students upon request.

#### Direct Costs:

1. Tuition and fees normally assessed for a student carrying the same academic workload – This information is provided by the school for each program offered by the school that is eligible for Title IV aid
2. An allowance for books, supplies, - Based on program at a school.

#### Indirect Costs:

3. Transportation and miscellaneous expenses – Average of the various means of transportation and other miscellaneous expenses used by students attending the school.
4. An allowance for room and board. – This will change if the student is living at home or living on his/her own. A student living with parents has a lower allowance than a student who is living off campus. It is possible for an independent student to live with his/her parents, in which case you should use the "living with parent" cost of attendance. An average is used for all room and board allowances.

When the calculations are complete, there are two costs of attendance for each program offered at the school (one for students living with their parents and one for students living off campus).

The Cost of Attendance is the starting point for calculating a student's financial aid. The Expected Family Contribution, as determined by the ISIR, will be deducted from the Cost of Attendance to establish a student's eligibility for financial aid.

If the student claims he/she is living off campus and the promissory note that the school may have in the file indicates the student is living at the same address as the parent, the school must use the "living with parent" cost of attendance.

## Cost of Attendance Budget for all Programs Procedure

### Responsibilities:

- Financial Aid Administrator
  - Contact the student once she or he receives the ISIR
  - Populate the students Cost of Attendance based on the information on the ISIR and program of interest and academic year
  - Develop an award letter based on the information provided
  - Discuss info with the student
  - Have student sign the award letter to accept, deny, or decrease
  - Given copy to the student
  - Allow students to complete enrollment forms with Admission counselor

## General Eligibility Criteria for FSA Program Funds

### General Eligibility Criteria for FSA Program Funds Policy

It is the policy of Northern Technical College to ensure that each student is eligible to receive Federal Student Aid (FSA) programs. The Financial Aid department is provided to help student determine their eligibility for FSA.

### General Eligibility Criteria for FSA Program Funds Procedure

#### Responsibilities:

- Admission Administrator
  - Verify High School Diploma
  - Sign all enrollment forms
- Financial Aid Administrator
  - Interviews the student and assist if needed on the application process for Financial Student Aid
  - Check to ensure that student is not in Default
  - Have a valid ISIR
  - If selected for Verification, submit all documents to clear the verification request
  - Complete the entrance counseling

- Check the NSLD website for borrowing limits and other documents needed from previous schools (transcripts)

## Eligibility Criteria for State Aid Assistance

### Eligibility Criteria for State Aid Assistance Policy

Schools that are out of compliance with these regulations may lose participation in all Financial Student Aid programs as of July 1, 2015, unless they can document that they have been working with their state on a school-by-school basis to become authorized by name to provide post-secondary education in their state. Northern Technical College maintains a Arkansas state approval with the Arkansas State Barbering Board to operate as a post-secondary school. This approval is renewed yearly by July 2nd.

## Processing Aid Applications

### Processing Aid Applications Policy

Northern Technical College encourages students to utilize Federal Student Aid to assist them with funding for programs eligible for Title IV Aid. Northern Technical College has an Admission/Financial Administrator on staff to assist any students who choose to complete the application on site, or they can choose to complete the process at home and use the counselors at Northern Technical College for questions. After completed Northern Technical College will obtain their FAFSA and work with their ISIR to determine their eligibility.

### Processing Aid Applications Procedure

#### Responsibilities:

- Financial Aid Administrator
  - Student applies for Financial Aid or visits the campus for info and applies
  - Financial Aid interview
  - Discuss FA options
  - Student Acceptance
  - Complete the FAFSA
  - Interviews the student and assist if needed on the application process for FSA
  - Check to ensure that student is not in Default
  - Verify Selective Service status
  - Verify High School Diploma
  - Verify Dependent or independent status
  - Complete verifications on student if applicable
  - Check Default rate
  - Verify all info on ISIR is correct
  - Package student- Award letter
  - Have students accept, deny, or reduce possible loan amounts

- Check the NSLD website for borrowing limits and other documents needed from previous schools (transcripts)
- Complete the entrance counseling
- Contact business office of new students and refunds to be received

## Calculation of Payment Period/Awarding of Aid

### Calculation of Payment Period/Awarding of Aid Policy

The institution has set up payment periods with the assistance of the Financial Aid Administrator, and the Business Administrator. Northern Technical College is a clock hour school and payment period is defined not only in clock hours but also in weeks of instructional time.

### Calculation of Payment Period/Awarding of Aid Procedure

#### Responsibilities:

- Business Administrator and Financial Aid Administrator notify the students of the information below:
  - If the program is one academic year or less, the academic year or program is divided into four payment periods. The first payment period is the period in which the student successfully completes 1/4 the clock hours AND 1/4 the weeks of instructional time in the program.
  - The second payment period is 2/4 the clock hours and 2/4 the weeks of instructional time in the program.
  - The third payment period is 3/4 the clock hours and 3/4 the weeks of the instructional time in the program.
  - The fourth payment period is 4/4 the clock hours and 4/4 the weeks of the instruction time in the program.
  - Pell Grant
  - • Aggregate Limit – None

#### DIRECT LOANS –

- Interest Rates:
- Congress has passed, and the President has signed the Bipartisan Student Loan Certainty Act of 2013 which ties federal student loan interest rates to financial markets. Under this Act, interest rates will be determined each spring for new loans being made for the upcoming award year, which runs from July 1st to the following June 30th. Each loan will have a fixed interest rate for the life of the loan.
- The following table provides the interest rates for new Direct Loans made on or after July 1, 2015 and before July 1, 2016. These rates will apply to all new direct Loans made during this time.
- Undergraduate Students Graduate Students

- -Subsidized Loans – 4.29% -Subsidized Loans – NA\*
- - Unsubsidized Loans – 4.29% - Unsubsidized Loans 5.84%
- - Parent PLUS loans – 6.84% -Grad PLUS Loans – 6.84%
- \*Any graduate loan periods that begin 7/1/12 or later are NO LONGER ELIGIBLE for Subsidized loans.

### Academic Year Limits:

- To be eligible for Full Subsidized Loan amounts, students must have a “Need”, according to their Need Analysis.
- Credit checks for a Direct PLUS Loan applicant are valid for 180 days.
- Independent Undergraduate Students:
- -1st Year Max Subsidized - \$3,500 /Unsubsidized - \$6,000 Max - \$9500
- -2nd year Max Subsidized -\$4,500/Unsubsidized - \$6,000 Max-\$10,500
- -3/4-year Max subsidized -\$5,500/Unsubsidized - \$7,000 Max-\$12,500

### Dependent Undergraduate Students:

- -1st Year Max Subsidized-\$3,500/Unsubsidized - \$2,000 Max - \$5,500
- -2nd Year Max Subsidized-\$4,500/Unsubsidized -\$2,000 Max - \$6,500
- -3rd/4th Year Max Sub \$5,500/Unsubsidized -\$2,000 Max - \$7,500
- - Parent PLUS Loans\* annual maximum depends on Cost of Attendance (COA) less other financial aid.
- \*If Parent PLUS Loan is denied, a Dependent Student may borrow at the Independent Levels.

### Independent Undergraduate Students (and Dependents whose parents cannot borrow PLUS):

- - \$57,500 – with a maximum of \$23,000 Subsidized
- Dependent Undergraduate Students:
- - \$31,000 – with a maximum of \$23,000 Subsidized
- Graduate Students (Independent):
- - \$138,500 – with a maximum of \$65,500 Subsidized.

## Packaging Aid

### Packaging Aid Policy

The general rule in packaging is that the student’s total financial aid must not exceed the student’s financial need (Need = Cost of Attendance (both direct and indirect costs) minus the EFC) the need will be filled with various financial aid programs.

## Packaging Aid Procedure

### Responsibilities:

- **Financial Aid Administrator**
  - A Pell Grant is considered to be the first source of aid to the student and packaging begins with Pell eligibility.
  - Check the NSLDS for default and or does not owe a refund on a grand from another school.
  - Check NSLDS to ensure that the student has not received Title IV aid for the same academic year
  - Check COD for the Pell LEU (Lifetime Eligibility Used)
  - You will use the STARS Packaging sheets to determine the financial aid available.
  - The general rule in packaging is that the student's total financial aid must not exceed the student's financial need (Need = Cost of Attendance (both direct and indirect costs) minus the EFC) the need will be filled with various financial aid programs.
  - Be sure the ISIR has correct information – Name, Social Security # - Date of Birth – address – telephone number as you will need these to process financial aid
  - Upload documents to FAME portal
  - Have students sign all Financial Aid documents in FA file (award letter)

## Identifying Payment Periods for Each Program

### Identifying Payment Periods for Each Program Policy

To ensure that students meet their clock hour, weeks of instruction, attendance and grade point average (GPA) requirements in order to be eligible for the next Title IV, HEA funding disbursement. Each student will be evaluated at the end of each payment period to determine eligibility.

### Responsibility/Tasks included in this policy:

Title IV, funding and SAP Evaluation points SAP evaluation periods are based on instructional hours and weeks completed for the program of enrollment at the school. Students will be notified of all SAP evaluation results at the end of each payment period.

The following is an example of the minimum number of hours and weeks that a student must complete at the end of each payment period to be considered eligible to receive the next Title IV, HEA Aid payments. Barbering which is 1500 clock hours and 34 weeks of instruction, the funding will be disbursed at:

### Payment Period Clock hours /Weeks –Barber Stylist

Note: Pay Period 1	Clock Hours	450	Week	13
Pay Period 2	Clock Hours	450	Week	13
Pay Period 3	Clock Hours	900	Week	26



**Payment Period Clock Hours/Weeks— Teacher, Manager, Instructor (Not available for Title IV benefits)**

Note: Pay Period 1            Clock Hours 350            Week 18  
      Pay Period 2            Clock Hours 700            Week 20

\* Students must meet their clock hour, weeks of instruction, attendance and grade point average (GPA) requirements in order to be eligible for the next Title IV, HEA funding disbursement. Each student will be evaluated at the end of each payment period to determine eligibility. Please note: that If the student is not meeting the SAP requirements, they will place their Title IV, HEA funding in jeopardy which could also result in a loss of Title IV, HEA funding.

## Identifying Payment Periods for Each Program Procedure

### Responsibilities:

- Instructors
  - Monitors clock hours, attendance, and Grade Point Average monthly.
  - Notifies Director of students who are not progressing satisfactorily based on the attendance or academic progress
- School Director
  - Conferences students of lack of hours, attendance or poor GPA
  - Alert the business office when a student has meet the requirement of the 1500, 34 weeks, 700, 20 weeks (not available for benefits) and the GPA requirements.
- Business Office Administrator
  - Alert Financial Aid of the students have met the payment period for their program

## Disbursements Policy for Pell and Direct Loans

### Disbursements Policy for Pell and Direct Loans Policy

Northern Technical College uses a third-party servicer, Financial Aid Management Education (FAME), to assist with ensuring that disbursements for Pell Grants and Loans are applied to students' accounts in a timely fashion. Disbursements are applied to student's ledger cards and are notified via text messages and or via email through the business office.

### Disbursements Policy for Pell and Direct Loans Procedure

#### Responsibilities:

- Student
  - Completes the FAFSA
- Financial Aid Administrator
  - Receive the ISIR from the FTP site (FAME portal)
  - Checks the ISIR for correctness, comments and verification
  - Enters corrections into the faaccess.ed.gov website and waits for new ISIR
  - Resolves all comments
  - Completes verifications
  - Packages student on the FEDD interface
- Business Office Administrator
  - Once ISIR is cleared for payment, Northern Technical College enters the disbursement information in the FAME interface and submits the input sheets to FAME
- FAME
  - FAME submits disbursement information to COD for all students.
  - FAME requests fund and places the funds transfers on the FTP site; an email is automatically sent to the Financial Aid Office at the school; and receipts/award notifications for students who received their first disbursements are automatically put on the FTP site.
  - On the date of the Funds Transfer, the funds are deposited by USDE into the school's federal bank account.
  - The school moves funds from their federal bank account to school's operating account. The school credits each student's ledger card with the Pell, SEOG or Loan payment using the date of the funds transfer with the funds transfer number in the reference column of the ledger.
  - Students are notified via text or email of the disbursements
  - FAME is notified through the business office.

## Disbursement for Parent Plus

### Disbursement for Parent Plus Policy

The disbursements may be credited to the student's account or made directly to the student or parent. Note that these time frames for disbursing to the student's account (or directly to the student or parent) are different than those for paying FSA credit balances to the student or parent. Northern Technical College generally has 14 days to pay a Financial Student Aid credit balance to the student or parent, unless it has written permission to hold the credit balance.

### Disbursement for Parent Plus Procedure

#### Responsibilities:

- Financial Aid Administrator
  - Alerts the Business Administrator of the disbursement for the student
  - Place a copy of all student ledgers in the student's files
- School Director

- Ensures the student is good academic standing (attendance and academic progress)
- Business Administrator
  - Applies the disbursement to the student ledger card/student account
  - Sends notification of disbursement to student via student portal email / text message
  - Sends notification to Financial Aid Management Education via email of disbursement
  - Prints and updated ledger card for student's FA and Ed files
  - If, and overpayment is received check with FA to ensure that the Parent Plus loan can be addressed to the parent.
  - Prepare overpayment to be mailed to parent or call parent to pick up overpayment within 14 days of receipt of the disbursement.
  - Apply overpayment to student's account- print ledger card for Financial Aid and Education Department Files.

## NSLDS Responsibilities

### NSLDS Responsibilities Policy

Student enrollment information is important, and Northern Technical College's approved to participate in the Financial Student Aid programs must have online enrollment access and have some arrangement to report student enrollment data to the National Student Loan Data System (NSLDS) through an enrollment roster file. Enrollment information is used to determine if the student is still considered in school, must be moved into repayment, or is eligible for an in-school deferment. For students moving into repayment, the out-of-school status effective date determines when the grace period begins and how soon a student must begin repaying loan funds. Northern Technical College is required to report changes in the student's enrollment status, the effective date of the status, and an anticipated completion date. Changes in enrollment to less than half-time, graduated, or withdrawn must be reported within 30 days.

### NSLDS Responsibilities Procedure

#### Responsibilities:

- **Financial Aid Administrator**
  - Reports enrolled students to the NSLDS database along with anticipated competition dates
  - Reports students has a change in enrollment status, graduated or withdrawn within 30 days.
  - Reviews the NSLDS database to ensure students have not received Title IV monies for the current semester.
  - Verify the roster file within 15 days and return to NSLDS- (This is completed with Fame- third party servicer)

# FISAP Responsibilities

## FISAP Responsibilities Policy

Managing Financial Student Aid assistance is a school-wide responsibility. Financial Student Aid program funds are provided to the Northern Technical College and all offices at Northern Technical College must work together to ensure successful program management. Northern Technical College's Financial Student Aid program management generally takes place in three functional areas:

The office of the Director  
The Financial Aid Office  
The Business Office.

## FISAP Responsibilities Procedure

### Responsibilities:

- **School Director/Owner**
  - Ultimate responsibility for Northern Technical College's Financial Student Aid(FSA) programs resides with the school's School Director. Although authority and responsibility are delegated to other offices, the leadership and support of the School Director are crucial to successfully administering Financial Student Aid programs. By recognizing the importance of federal aid programs, making Financial Student Aid program administration a high priority, and holding key officials accountable, the School Director leadership can foster an environment that promotes an effective and responsive financial aid program that meets institutional goals, students' needs, and federal requirements.
    - accurate, current, and complete disclosure of the financial condition of each federal aid program or project sponsored by Education Department;
    - effective control over and accountability for all funds, property, and other assets, including adequate safeguarding of all such assets to ensure that they are used solely for authorized purposes
    - comparison of actual expended amounts with amounts budgeted for each Financial Student Aid program;
    - procedures according to the applicable terms of the FSA program for determining reasonableness, allowability, and allocability of costs
    - examinations in the form of external or internal audits, which must be made according to generally accepted auditing standards and government auditing standards
- **Financial Aid Administrator**

- While a school’s financial aid office is usually assigned most of the responsibility for administering Financial SA programs, its role in the institution’s fiscal operation is a limited one.
  - ensuring proper filing of timely applications
- **Business Office Administrator**
  - This office may also be known as the fiscal office, finance office, comptroller’s office, bursar’s office, treasurer’s office, or student accounts office. The business office provides critical services to Northern Technical College in managing both federal and non-federal financial aid programs. Administering the accounting, recordkeeping, and reporting functions related to Northern Technical College’s use of federal and other funds requires many detailed, complex systems
    - records that adequately identify the source and application of funds for sponsored activities and contain information on institutional awards, authorizations, obligations, unobligated balances, assets, income, liabilities, revenues, expenditures, and cash disbursements;
    - procedures to ensure the timely, efficient transfer of funds when they are advanced through electronic methods (these procedures must limit the time between the transfer of funds from the U.S. Treasury and cash disbursement by the school to students so that funds are disbursed no later than three business days following the receipt of funds, and do not result in excess cash.
    - accounting records that are supported by audit trail documentation
    - monthly reconciliation of individual student FSA awards as recorded in the financial aid, business office, student account, and Department systems (for Pell and Direct Loan)

## Institutional

## Updating ECAR

### Updating ECAR Policy

Northern Technical College updates the ECAR in the event of a change of ownership, adding new programs, recertification, closure of a location, changing to clock hours to credit hours, and or adding additional locations.

### Updating a program

The school must update information about its educational programs when completing its recertification application. This includes updating CIP codes, program names, and program lengths. A school must update its E-App with changes to GE programs within 10 days of making the change. Schools should note that making a substantive change to a program may result in the creation of a new program.

CIP codes Classification of Instructional Programs (CIP) codes are developed by the U.S. Department of Education’s National Center for Education Statistics. (<http://nces.ed.gov/ipeds/cipcode>)

### Approval for clock-hour programs at proprietary schools

If a proprietary school submitting an E-App is in provisional status, any new program needs to have been continuously provided for at least two (2) years prior to the application date, or it cannot be approved until the school reaches the two year mark.

Short-term programs at all institutions must have been continuously provided for twelve months to be considered for approval.

#### **Limitations for schools subject to “2-year rule”**

For schools subject to the 2-year rule, during the school’s initial period of participation in the FSA programs, the Department will not approve adding programs that would expand the school’s eligibility beyond the current ECAR. An exception may be considered if the school can demonstrate that the program was legally authorized and continuously provided for at least two years prior to the date of the request. In addition, a school subject to the 2-year rule may not award FSA funds to a student in a program that is not included in the school’s approval documents.

## **Updating ECAR Procedure**

### **Responsibilities:**

- **School Director/Owner**
  - Complete the ECAR with updated information to Department Of Education
  - Completes the E-APP no later than 90 calendar days before the PPA is expires for recertification

# **State Authorization Procedures**

## **State Authorization Procedures Policy**

Generally, an eligible institution must be located in a state. A school is physically located in a state if it has a campus or instructional site in that state. Northern Technical College renews their authorization and their approval status with the Arkansas Board of Barber Examiners annually at the end of the year.

## **State Authorization Procedures Procedure**

### **Responsibilities:**

- School Director
  - Completes the renewal application annually by January 31<sup>st</sup>.

# Financial Aid and Business Office Forms

## Financial Aid and Business Office Forms Policy

Financial Aid and business office forms are reviewed for updates as needed. These updates are driven by the Northern Technical College's third-party servicer and federal mandated updates. Hard copies of these forms are stored in the Northern Technical College Financial Aid Administrative Office in a binder, electronic file folder, and UBS. Past copies are archived in the Financial Aid Administrative office as hard copies in a binder and/or fire safety secured file.

## Financial Aid and Business Office Forms Procedure

- **Responsibilities:**
  - Director/Financial Aid Administrator/ Business Office Administrator
    - Responsible for reviewing updates and modifying forms as needed.
  - Financial Aid Office
    - Responsible for keeping hard copies of former forms as well as current copies of updated forms in a binder in the Financial Aid Administrative office.
  - Business Office
    - Uploading forms on the computer's FA folder and Northern Technical College Binder with hard copies

# Financial Aid Trainings

## Financial Aid Trainings Policy

It is the policy of Northern Technical College to ensure that all Financial Aid Administrator and affiliated personnel are trained in Financial Aid. Therefore, those persons are required to attend the necessary trainings to become trained to service students who are receiving funding. Each person must complete the 20-hour online training (Fundamentals), attend the online webinar with Financial Aid Management Education and create an account with ifap.ed.gov to obtain valuable information about GCL, Financial Aid (FA) webinars, FA handbooks and other updates.

## Financial Aid Trainings Procedure

### Responsibilities:

- Financial Aid Administrator / Business Administrator

- Complete 20 online training within 1 month of the date of hire
- Obtain access to Ifap.ed.gov within 2 weeks of date of hire
- Intercept the DCL, review for updates and disclose information to supervisor
- School Director
  - Monitors, supervises, and plan travel arrangements the training to ensure that training is completed in the time permitted.

## Annual Calendar of Related Activities

### Annual Calendar of Related Activities Policy

It is policy for all Financial Aid Administrator and related personnel to be up to date with Financial Aid (FA) activities and trainings. Therefore, all employees in the department of FA and the business office must have a log in to ifap.ed.gov to have access to the Financial Student Aid calendar and related activities.

### HOLIDAY AND BEREAVEMENT LEAVE

Northern Technical College operates on a 12-month academic calendar, with the classes in session January through the end of December. New Classes start on the first Tuesday of every 3 month. (can be adjusted when applicable)

#### SCHOOL HOLIDAYS

The school observe the following holidays:

New Year's Day  
 Martin Luther King Day  
 Mardi Gras  
 Memorial Day  
 Fourth of July  
 Labor Day  
 Thanksgiving Day  
 Christmas Eve and Day

**\*\*Additional closures may occur at the school's discretion.**

#### BEREAVEMENT LEAVE

Northern Technical College will allow for time off in the event of death of the following immediate family members:

Spouse  
 Mother-in-law  
 Grandchild  
 Sister  
 Parent



Grandparent  
Father-in-law  
Child or Stepchild  
Brother

## Annual Calendar of Related Activities Procedure

- **Responsibilities:**
  - Financial Aid Administrator and Business Office Administrator
    - Create a log in to ifap.ed.gov
    - Visit the site regularly for updated activities and its content

# Communication of Officials for FSA Funding Purposes

## Communication of Officials for FSA Funding Purposes Policy

Northern Technical College Financial Aid Administrator must communicate with related departments and the third-party server FAME (Financial Aid Management Education) about ensuring that all documents funding requirements, eligibility and requirements maintained.

## Communication of Officials for FSA Funding Purposes Procedure

- **Responsibilities:**
  - Admission/ Financial Aid Administrator/ Business Office Administrator
    - Meet weekly in staff meeting to share important information regarding student funding
    - Meet daily to discuss individual students in regard to specific requirements, verifications, etc.
    - Communicate via student portal in the Admission tab to keep each department updated in the finding process of each student
    - Documents all appointments for Financial Aid, Enrollment, or business office administrator in administrative calendar for all departments to view.
    - Communicates with the third-party server and the business office for funding requirement, eligibility and requirements maintained.

# Recertification Procedure

## Recertification Procedure Policy

Recertification is the process through which a school that is presently certified to participate in the Financial Student Aid programs applies to have its participation extended beyond the expiration date of its current Program Participation Agreement (PPA). The Department will notify a school six months prior to the expiration of the school's PPA. The school must submit a materially complete application before the expiration date listed in its PPA.

## Recertification Procedure

### Responsibilities:

- School Director
  - Complete the APP no later than 90 days prior its current eligible PPA expires and submit
  - Once approved submit two signed PPA documents to the Department of Education
  - Once signed by the Department of Education, one signed copy will be returned to the school.
  - Once received a signed copy will be placed into the school files.
  - Ensure that Part 2 Certification is signed and returned by the Third Party Servicer (FAME).

# Institutional and Program Accreditation Approval, or Licensure Information

## Institutional and Program Accreditation Approval, or Licensure Information Policy

It is mandatory for Northern Technical College to maintain all current institutional accreditation and approvals and/or licensure information on campus.

## Institutional and Program Accreditation Approval, or Licensure Information Procedure

### Responsibilities:

- School Director
  - Will maintain all current approvals for accreditation agencies, state approvals and licensed information on site. This information will be secured in a binder or filing cabinet labeled by agency or body. All information will be filed with the most recent information first.

## Scheduled Breaks

### Scheduled Breaks Policy

All student scheduled breaks follow major holidays for the geographical location of Northern Technical College. Breaks are in the catalog, posted on the student portal, and on the electronic bulletin board.

### HOLIDAY AND BEREAVEMENT LEAVE

Northern Technical College operates on a 12-month academic calendar, with the classes in session January through the end of December. New Classes start on the first Tuesday of every month. (can be adjusted when applicable)

#### SCHOOL HOLIDAYS

The school observe the following holidays:

New Year's Day  
Martin Luther King Day  
Mardi Gras  
Memorial Day  
Fourth of July  
Labor Day  
Thanksgiving Day  
Christmas Eve and Day

Northern Technical College will allow for time off in the event of death of the following immediate family members:

Spouse  
Mother-in-law  
Grandchild  
Sister  
Parent  
Grandparent  
Father-in-law  
Child or Stepchild  
Brother

## Scheduled Breaks Procedure

### Responsibilities:

- School Director or designee
  - Will update the campus catalog, bulletin board, and student portal of scheduled breaks
- Instructors
  - Will remind students of scheduled breaks and ensure to reflect breaks on pacing charts and lesson plans.

# Protecting Student Information

## Protecting Student Information Policy

Northern Technical College views PII (Personally Indemnifiable Information) as a high priority. Students are required to sign media permission form, and all employees are required to understand the important of PII. Northern Technical College monitors the controls and protects student's information and ensure that system users are trained properly.

## Protecting Student Information Procedure

### Responsibilities:

- School Director
  - Limit access to only modules needed in the student portal
  - Audit review use of information of students by accessing and monitoring log in reports
  - Identify and authenticate of users by issuing passwords throughout portal system to gain access modules
  - Limit individuals to access certain modules by only allowing access to modules needed
  - Monitor and control interoffice communications by only using student portals for communication,
- Admission/Financial Aid Administrator
  - Have all students sign a media release form accepting or denying photographs and posting photographs.

# Unaccompanied Homeless Youth Determinations

## Unaccompanied Homeless Youth Determinations Policy

If a student does not have and cannot get documentation from any of the authorities given on page 28, you (the financial aid administrator) must determine if she is an unaccompanied youth who is homeless or is self-supporting and at risk of being homeless. It is important to make homeless youth determinations on a case-by-case basis.

## Unaccompanied Homeless Youth Determinations Procedure

### Responsibilities:

- **Financial Aid Administrator**
  - Ask for help with determining eligibility from local school district homeless liaisons, state homeless education coordinators, or the National Center for Homeless Education (<http://center.serve.org/nche>).
  - Use discretion when gathering information, and respect the student's privacy. Some information, such as that protected by doctor-patient privilege, is confidential.
  - Determine eligibility based on the legal definitions provided
  - Unaccompanied homeless youth may use the address of your school as their own on the FAFSA
  - Use third party servicer, Financial Aid Management Education (FAME), to assist in this process to determine the professional judgment.

# Third-Party Servicer Requirements

## Third-Party Servicer Requirements Policy

Northern Technical College uses a third-party servicer, FAME (Financial Aid Management Education) to assist in the Financial Student Aid (FSA) process. They are considered a consultant in administering the FSA programs.

## Third-Party Servicer Requirements Procedure

### Responsibilities:

- The follow departments work with FAME in maintain compliance in the areas / duties below. Financial Aid Administrator/Business Office Administrator/ Director
  - Processing student financial aid applications, performing need analysis, and determining student eligibility or related activities;
  - Certifying loans, servicing loans, or collecting loans;
  - Processing output documents for payment to students, and receiving, disbursing, or delivering FSA funds;
  - Conducting required student consumer information services;
  - Preparing and certifying requests for cash monitoring or reimbursement funding
  - Preparing and submitting notices and applications required of eligible and participating schools, or preparing the Fiscal Operations Report and Application to Participate (FISAP); and
  - Processing enrollment verification for deferment forms or NSLDS enrollment reporting.

# Third-Party Servicer- PPA

## Third-Party Servicer- PPA Policy

Northern Technical College uses a third-party servicer, FAME (Educational Compliance Management) to assist in the Financial Student Aid process. Northern Technical College and Department Of Education requires a signed Part 2 Certification by the FAME and Northern Technical College's School Director.

## Third-Party Servicer- PPA Procedure

### Responsibilities:

- **School Director**
  - Sign the Program Participation Agreement (PPA)
  - Forward the PPA to Educational Compliance Management for signature
  - Forward the signed PPA to Department Of Education with both signatures 90 days prior to the expiration date of the current PPA.

## Requesting Funds from the Third-Party Servicer

### Requesting Funds from the Third-Party Servicer Policy

Northern Technical College uses Educational Compliance Management (FAME) as a tool to collect and disburse Title IV disbursements for students. Disbursements are made at the student's payment period.

### Requesting Funds from the Third-Party Servicer Procedure

- **Policy:** See above policy
- **Purpose:** To process Financial Student Aid
- **Responsibilities:**
  - School Director/Instructor
    - Alerts Financial Aid that student has reached their payment period based on attendance and Grade Point Average.
    - Sign in sheet is printed along with progress report and is submitted to Financial Aid Administrator
  - Financial Aid Administrator
    - Places current sign in sheets and progress reports in student's FA file
  - Business Office Administrator
    - Request disbursement from FAME
    - After receiving notification of funds available
    - Transfer funds to operating account
    - Notate the disbursement on the student ledger card
    - Print the ledger card submit Ed. File and FA file
    - Notify student in writing of disbursement
    - Notify FAME in writing of disbursement

# eZ Audit

## eZ Audit POLICY

The institution utilizes eZ- Audit for financial compliance. EZ-Audit is a web based paperless single point of submission for financial statements and compliance audits. A business office Administrator and/or the local auditor hired by the school simply signs on to eZ-Audit, enters summary audit and financial data directly from your report into a web form, attaches an electronic version of the report, and hits the submit button. The institutions' submission through eZ-Audit will allow for more rapid and efficient processing by the Department of Education (ED) and therefore provide us with immediate feedback. If the institution expends less than 300,000 in federal funds ending after December 31, 2003, the institution is not required to submit a compliance audit.

## eZ Audit PROCEDURES

### Responsibilities

- Business Office Administrator/School Director/Auditor
  - Contacts the local auditors and submits its compliance audit data and summary financial data via an internet web form.
  - Submit a registration request on the state auditor's letterhead to input the institutions data
  - The school/auditor attaches an electronic copy of the school's financial statement and compliance audit in a non-editable pdf format (using Adobe Acrobat)
  - The eZ-Audit system automatically forward flagged financials and deficient audits to FSA's Case Management Team for resolution.
  - Case Teams communicate with you to reach resolution
  - As desired, you can periodically check eZ-Audit for status of your report.
  - Audit year is Oct.-Sept.
  - Audit must be received by the Department of Education by April of each year
  - DE must accept and if rejected on/or after April 30, it will be considered late.



# Crediting Student Accounts

## Crediting Student Accounts Policy

Northern Technical College credit's student's accounts as cash payments are made and as disbursements are requested. Accounts are updated on the day of payment or disbursement was made and students are able to view their balances using the student's portal as well as obtain a receipt.

## Crediting Student Accounts Procedure

- **Responsibilities:**
  - Business Office Administrator
    - Credit's students account to ledger card
    - Prints receipts for students who make cash payments
    - Notifies students of disbursements made to the ledger card
    - Prints an updated ledger card for all disbursements for Financial Aid and Department of Education files.

# Drawing Down Federal Funds

## Drawing Down Federal Funds Policy

The institution and FAME use the G5 payment system to request payments, adjust drawdowns and refund/return funds. G5 also provides continuous access to current grant and payment information, such as authorized amounts, cumulative net drawdowns, refunds, returns, current award balances and payment histories. A school's available balance is the amount of cash available for a school to draw down through G5. The available balance is the difference between the authorized amount and the school's net drawdowns to date. A separate Authorization is maintained for each program by award year.

A school may not request more funds than it needs immediately for disbursements the school has made or will make to eligible students and parents. Therefore, a school must make the disbursements as soon as administratively feasible, but no later than three business days following the date the school receives those funds.

If G5 accepts a school's request for funds, it will make an electronic funds transfer (EFT) of the amount requested to a bank account designated by the school.

A school's authorization is the amount of FSA funds a school is eligible for in the year and program in question. The authorization is called the Current Funding Level (CFL) in the Pell, IAS Grant and

ACG/SMART Grant programs, and Cash Control Account (CCA) in the Direct Loan and TEACH Grant programs.

## Drawing Down Federal Funds Procedures

### Responsibilities

- **Business Office Administrator**
  - **Request funds to drawdown from FAME**
  - **Wait for the drawdown from FAME to be deposited into bank accounts**
  - **Meet with student to share findings of drawdown**
  - **Disburse funding to student**

## DISBURSEMENT OF FEDERAL FUNDS

### DISBURSEMENT OF FEDERAL FUNDS Policy

The institution must notify a student of the amount of funds the student and his or her parent can expect to receive

back from each FSA program, including FWS, and how and when those funds will be disbursed. This notification must be sent before the disbursement is made. If the funds include a Stafford Loan (whether Direct Loan or FFEL), the notice must indicate which funds are from subsidized loans and which are from unsubsidized loans. A school must provide the best information that it has regarding the amount of FSA program funds a student can expect to receive. Because the actual disbursements received by a student may differ slightly from the amount expected by the school (due to loan fees and rounding differences), you may include the gross amount of the loan disbursement or a close approximation of the net disbursement amount. A school must also notify the student or parent in writing (in writing means on paper or electronically) when Perkins, Stafford, or PLUS loan funds are being credited to a student's account. This notification must be sent no earlier than 30 days before and no later than 30 days after crediting the student's account. The notification must include:

- the date and amount of the disbursement,
- the student's (or parent's) right to cancel all or part of the loan or disbursement, and
- the procedures and the time by which the student (or parent) must notify the school that he or she wishes to cancel the loan or disbursement.

These rules apply to the following programs: Pell Grant, FSEOG, Perkins Loan, Direct Loan, FFEL. We have indicated when a rule applies to FWS. This chapter will discuss the rules for crediting FSA funds to the student's account and making direct disbursements to the student or to the parent (PLUS), with provisions for early disbursements, delayed disbursements, and late disbursements.

- Notifications & Authorizations → notification of disbursement → required student/parent authorizations → notification/authorization by electronic means
- Method of disbursement → credit to student's account (school may hold credit balance if authorized) → disbursement directly to student or parent
- Disbursement rules → timing of multiple disbursements → FWS students must be paid at least once a month → funds may be disbursed up to 10 days before classes begin (in most cases) → disbursements to 1st-time, 1st-year, Stafford borrowers must be delayed 30 days → requirement to successfully complete coursework in clock-hour and nonterm credit-hour and certain nonstandard term credit-hour programs → school may make unequal FSEOG/Perkins disbursements to meet uneven costs → under certain conditions, late disbursements must be made to students
- Prompt disbursement rules → usually 3-day timeframe for school to disburse to student/parent after receiving funds → exception: school may delay returning Stafford/PLUS funds to lender in some cases →

Note that in the case of FFEL loan funds received from a lender by a means other than EFT payment or master check, the notice to the student or parent need not include information on the right of the student or parent borrower to cancel all or a portion of the loan. This is because a student or parent who receives a disbursement via check has the opportunity to refuse the funds by not endorsing the check or by returning it to the lender.

The school may not use an in-person or telephonic conversation as the sole means of notification because these are not adequate and verifiable methods of providing notice. However, a school may use in person and telephone notices in addition to those provided in writing.

If the student or parent borrower wishes to cancel all or a portion of a loan, he or she must inform the school. The school must honor a request if it receives the request before the start of the payment period, or if it receives the request within 14 days after it sent the notice to the borrower. If the school receives a student's or parent's request for cancellation after these dates, the school may, but is not required to, honor the request. Regardless of when the request is received, the school must inform the student or parent of the outcome of the request.

When acting upon a loan cancellation request, your school must return the loan proceeds and/or cancel the loan as appropriate. A school is not responsible for returning any portion of a loan that was disbursed to a student or parent directly before the request for cancellation was received. However, you are encouraged to take an active role in advising the borrower to return the funds already received.

Before the school can perform any of the following activities, you must obtain authorization from a student (or parent borrower):

- Disburse FSA funds (including FWS wages) by EFT to a bank account designated by the student or parent.
- Use FSA funds (including FWS) to pay for allowable charges other than tuition, fees, and room and board if the student contracts with the school.
- Hold an FSA credit balance.
- Apply FSA funds to minor prior-year charges.

A school may not require or coerce the student or parent to provide the authorization and must clearly explain to the student or parent how to cancel or modify the authorization. The student or parent may cancel or modify the authorization at any time.

A cancellation or modification is not retroactive—it takes effect on the date that the school receives it from the student or parent. If a student or parent cancels an authorization to use FSA program funds. If you are notifying the student of the next disbursement by electronic mail or other electronic means, you are encouraged to follow up on any electronic notice for which you receive an “undeliverable” message. Anytime a school returns an FFEL disbursement or any portion of an FFEL disbursement to a lender, the origination fee and insurance premium are reduced in proportion to the amount returned. If a student returns

the full amount of a loan within 120 days of disbursement, the loan is cancelled and the origination fee and insurance premium are eliminated.

If a student borrower not in repayment returns an FFEL disbursement or any portion of an FFEL disbursement to the lender within 120 days after disbursement, the origination fee and insurance premium are reduced in proportion to the amount returned.

## **DISBURSEMENT OF FEDERAL FUNDS PROCEDURES**

### **Responsibilities**

- Business Office Administrator
  - Notify student or parent of the amount of funds awarded
  - Inform student or parent they have the right to cancel all or part of funding received
  - Must get authorization to disburse funds from student or parent

# Fiscal Recordkeeping Process

## Fiscal Recordkeeping Process Policy

Northern Technical College must keep comprehensive, accurate program and fiscal records related to its use of Federal Student Aid (FSA) program funds. The importance of maintaining complete, accurate records cannot be overemphasized. Program and fiscal records must demonstrate the school is capable of meeting the administrative and fiscal requirements for participating in the FSA programs. In addition, records must demonstrate proper administration of FSA program funds and must show a clear audit trail for FSA program expenditures. For example, records for each FSA recipient must clearly show that the student was eligible for the funds received and that the funds were disbursed in accordance with program regulations. In addition to the general institutional record keeping requirements discussed here, a school must also comply with all program-specific record keeping requirements contained in the individual FSA regulations.

### Minimum Record Retention Periods

#### RECORD MAINTENANCE - Acceptable formats

A school must maintain all required records in a systematically organized manner. Unless a specific format is required, a school may keep required records in

- hard copy
- optical disk
- microform
- CD-ROM
- computer file
- other media formats

All other record information, regardless of the format used, must be retrievable in a coherent hard copy format (for example, an easily understandable printout of a computer file) or in a media format acceptable to the Department. The requirement providing for other media formats acceptable to the Department allows for the use of new technology as it is developed. The Department will notify schools of acceptable media formats; schools should not apply for approval of a media format.

Minimum Record Retention Periods of FSA approximately 3 years.

Loans are retained UNTIL End of the award year in which the student last attended.

The loan is satisfied or the documents are needed to enforce the obligation

The date on which a loan is assigned to the Department, cancelled, or repaid

End of the award year for which the aid was awarded

End of the award year in which the report was submitted

Any document that contains a signature, seal, certification, or any other image or mark required to validate the authenticity of its information must be maintained in its original hard copy or in an imaged media format. This includes tax returns, verification statements, and Student Aid Reports (SARs) used to determine eligibility, and any other document when a signature seal, etc., contained on it is necessary for the document to be used for the purposes for which it is being retained.

A school may maintain a record in an imaged media format only if the format is capable of reproducing an accurate, legible, and complete copy of the original document. When printed, the copy must be approximately the same size as the original document.

Please note that promissory notes that are signed electronically, must be maintained electronically in accordance with the requirements of 34 CFR 668.24(d)(3)(i) through (iv).

## Fiscal Recordkeeping Process Procedure

### Responsibilities:

- Financial Aid Administrator
  - School Director
  - Satisfactory Academic Progress (SAP) documentation
  - Admission enrollment documentation
  - Enrollment status
  - Certification statements
  - Verifying application data resolving conflicting information
  - Professional Judgment decisions
  - Financial Aid history information for transfer students
- School Director
  - State agency reports
  - Audits and program review reports
  - Self-evaluation reports
- , Business Officer Administrator
  - Pell grant statements
  - Can request quarterly statements monthly reports from G5
  - Reconciliation reports
  - State grand and scholarship award rosters and reports
- School Director
  - Program participation agreement, approval letter, and Eligibility and Certification Approval Report (ECAR)

## Fiscal Reporting Process

### Fiscal Reporting Process Policy

Northern Technical College is required to submit audited financial records by a CPA with the GAAP credentials, Department of Education (DOE), and COE annually. The audited financials' outcome must fall within the guidelines of the DOE and the COE's regulations to remain in good standing with both agencies.

### Fiscal Reporting Process Procedure

#### Responsibilities:

- **Director**

- Contact the CPA on September 1st to request documents needed to complete the audit
- Submit documents no later than 30 days
- Submit final audited Financials to Department Of Education (DOE) no later than April 30<sup>th</sup>
- Make corrections that may be needed by DOE
- Make final submission by April 30th
- **Business Administrator**
  - **Prepare monthly records**
  - *Communicate with auditing companies to keep books in compliance.*

## Monthly and Annual Reconciliation

### Monthly and Annual Reconciliation Policy

Northern Technical College reconciles monthly and annually all cash and funds disbursed each month to the business office records, ledger cards and banks statements.

### Monthly and Annual Reconciliation Procedure

- **Responsibilities:**
  - Financial Aid Administrator/Business Office Administrator
    - Determines the amount disbursed each month according to the Financial Aid Officer records.
  - Business Office Administrator
    - Determines the amounts disbursed and cash collected each month according to the business office records, ledger, bank statements

## Procedures for Handling Overpayments

## Procedures for Handling Overpayments Policy

An overpayment exists when a student's aid package exceeds his or her need. While your Northern Technical College must always take care not to overpay a student when packaging his or her aid, circumstances may change after a student has been packaged and the student's aid that result in an overpayment.

## Procedures for Handling Overpayments Procedure

- **Responsibilities:**
  - Business Office Administrator
    - Apply the student's ledger card with the disbursement amount
    - Alert the Financial Aid Administrator of the overpayment due to the student confirming the amount
    - Notify the student of the disbursement and the overpayment within 14 days of the disbursement
    - Issue the overpayment to the student, apply it to the ledger card.
    - Make a copy of the ledger card for the Financial Aid File and Education Department file
  - Financial Aid Administrator
    - Place copy of student ledger in the Financial Aid file

# Excess Cash

## Excess Cash Policy

A school must disburse requested funds no later than three business days following the date the school receives the funds. "Excess cash" is any amount of SFA Program funds, other than funds received under the just-in-time payment method that a school does not disburse to students by the end of the third business day. Excess cash must be returned to the Department immediately. However, sometimes a school is prevented from disbursing funds in the required three days because of circumstances outside the school's control. For example, a school may not have been able to disburse funds because of a change in a student's enrollment status, a student's failure to attend classes as scheduled, or a change in a student's award as a result of verification. To take these circumstances into account, under the following circumstances, a school may maintain an excess cash balance for up to seven additional days.

For a period of peak enrollment (see below) at the school during which a drawdown of excess cash occurs, the school can maintain the excess cash balance in its federal account if the excess cash balance is less than 3% of the school's total prior-year drawdowns. The school is required to eliminate the excess cash balance within the next seven days by disbursing SFA Program funds to students for at least the amount of that excess cash balance.

A period of peak enrollment at a school occurs when at least 25% of the school's students start classes during a given 30-day period.

A school determines this percentage for an award year with the following fraction:



-Number of students who started classes in the comparable 30-day period in the prior award year Total number of students who started classes during the entire prior award year.

-For any period other than a period of peak enrollment, the school can maintain the excess cash balance if the excess cash balance is less than 1% of the school's prior-year drawdowns. In this case also, the school is required to eliminate the excess cash balance within the next seven days by disbursing SFA Program funds to students for at least the amount of that balance.

-If a school that is participating in the Direct Loan Program does not have prior-year drawdown data for the Direct Loan Program because it did not participate in the Direct Loan Program for that prior award year, the school may include the total amount of loans guaranteed under the FFEL Program for students attending the school during that year in determining total prior-year drawdowns.

-The Department reviews schools to determine where excess cash balances have been improperly maintained and to seek recovery from those schools of the resulting losses to the government.

Upon a finding that a school has maintained an excess cash balance in excess of allowable tolerances, a school is required to reimburse the Department for the costs that the government incurred in making those excess funds available to the school. In addition, where excess cash balances are disproportionately large to the size of the school or represent a continuing problem with the school's responsibility to administer efficiently the SFA Programs, the Department may initiate a proceeding to fine, limit, suspend, or terminate the school's participation in one or more of the SFA Programs. (For more on fines and other actions against schools, see Chapter 11 in FSA Handbook)

Generally, a check is "issued" when the school releases, distributes, or makes available the check by mailing the check to the student or parent (if applicable), or by notifying the student or parent expeditiously that the check is available for immediate pickup. However, upon a finding that a school has maintained excess cash balances, the Department considers the school to have issued a check on the date that check cleared the school's bank account, unless the school demonstrates to the satisfaction of the Department that it issued the check to the student shortly after the school wrote that check.

Finally, the Department will assess a school that maintains excess cash balances a liability that is equal to the difference between the earnings those cash balances would have yielded under a Treasury derived rate and the actual interest earned on those cash balances.

## Excess Cash Procedures

### Responsibilities

- Business Office Administrator
  - Disburse FSA funds to students
  - Monitors Excess Cash in accounts
  - Return excess cash to the State Department of Education immediately after third day of school receiving funds.
  - May keep fund beyond the third day if there is an extenuating circumstance. (7 days)

# Credit Balance Authorization/Retention Procedures

## Credit Balance Authorization/Retention Procedures Policy

A Credit Balance Authorization is issued to the student in the event that a student or parent would like to place hold on a credit balance. In order place a hold on such funds, the student or parent must complete the Authorization to Hold a Federal Student Aid Credit Balance form.

### FSA CREDIT BALANCES

A Title IV credit balances occurs whenever the amount of Title IV funds credited to a student's account for a payment period exceeds the amount assessed the student for allowable charges associated with that payment period.

If FSA disbursements to the student's account at the school create an FSA credit balance, you must pay the credit balance directly to the student or parent as soon as possible but no later than 14 days after

- ◆ the first day of class of a payment period if the credit balance occurred on or before the first day of class of that payment period;
  - ◆ the balance occurred if the credit balance occurred after the first day of class of a payment period.
- The law requires that any excess PLUS Loan funds be returned to the parent. Therefore, if PLUS Loan funds create a credit balance, the credit balance would have to be given to the parent. However, the parent may authorize your school (in writing or through StudentLoans.gov) to transfer the proceeds of a PLUS Loan credit balance directly to the student for whom the loan is made (for example, to a bank account in the student's name).

The Department does not specify how a school must determine which FSA funds create an FSA credit balance. A school may not require a student to take any actions to obtain his or her credit balance. It is the sole responsibility of the school to pay, or make available, any FSA credit balance within the 14-day regulatory time frames.

Notwithstanding any authorization obtained by the school, the school must provide the student with any remaining FSA credit balance resulting from FSA loan funds by the end of the loan period and

any other FSA program credit balances by the end of the last payment period in the award year for which the funds were awarded.

## Credit Balance Authorization/Retention Procedures Procedure

### Responsibilities:

- Business Office Administrator
  - Determine if the student will have a credit balance
  - Offer the student or parent (in the event of a parent plus) the option to complete the Credit Balance form
  - If chosen not to complete the form, overpayments must be issued to the parent or student- information submitted to the Business Office.

# GAPS and COD

## GAPS and COD Policy

Northern Technical College requires that each student receives a person search called Common Origination and Disbursement (COD). This information consists of student and borrower demographics along with details about the awards they hold. It determines what percentage of the scheduled award for the current year has been used. J's Barber requires the use of a core financial system (GAP) which integrates the following processes: financial management, contracts and purchasing, grants administration and payment management. It will provide full financial management support services including: obligation of award authorizations, disbursement of funds, and final grant closeout.

## GAPS and COD Procedures

- **Purpose:** To view students' previous demographics along with details about the awards they hold.
- **Responsibilities:**
  - **Admission/Financial Aid Administrator**  
After the interview and application is complete the Financial Aid Administrator will do a COD search on each student.  
The COD search will give the FAA demographics along with details about the awards they hold.
  - **Business office Administrator**

The Financial Aid Administrator uses the (GAP) a core financial system which will provide full financial management support services.

- Disbursement of Funds
- Final Grant closeout

## Prior Year Charges

### Prior Year Charges Policy

PRIOR-YEAR CHARGES in general, SFA Program funds are allowed to be used to pay only for educational expenses a student incurs in the period for which those funds are provided. However, a school is permitted to use a student's SFA Program funds to pay minor prior-year institutional charges if the student has, or will have, an SFA credit balance, and the school obtains the student's or parent's authorization to pay the prior year charges.

A school may obtain authorization from a student in advance to use SFA Program funds to cover prior-year charges that are less than \$100. To pay prior-year charges for amounts equal to or greater than \$100, in addition to obtaining an authorization, a school must determine that payment would not prevent the student from paying for his or her current educational expenses.

-If a student's title IV aid package includes only a Direct Loan, the current year is the current loan period. (July 1, 2016)

-If a student's title IV aid package includes only non-Direct Loan aid, the current year is the award year.

-\*NEW\* If a student's title IV aid package includes both a Direct Loan and other aid, the institution may choose to use either the loan period or the award year as the current year.

### Prior Year Charges Procedures

#### Responsibilities

- **Business Office Administrator**
  - Obtain authorization from a student or parent in advance to use SFA Program Funds to cover prior-year charges that are less than \$100.
  - Pay minor prior-year institutional charges if an SFA credit balance occurs only to pay for student's costs for the period for which the funds are provided.
  - Current-year funds for prior award year charges for tuition and fees (and with permission, educationally related charges) for a total of no more than \$200. May not pay prior year charges in excess of \$200.

## Separation of Duties

## Separation of Duties Policy

To manage Northern Technical College's financial aid programs effectively, the aid administrator must be supported by an adequate number of professional and clerical personnel. The number of staff that is adequate depends on the number of students aided, the number and types of programs in which the Northern Technical College participates, the number of applicants evaluated and processed, the amount of funds administered, and the type of financial aid delivery system the school uses.

The Department will determine on a case-by-case basis whether a school has an adequate number of qualified persons, based on program reviews, audits, and information provided on the school's application for approval to participate in the FSA programs. Each department is responsible for specific duties to assist in facilitating the duties of each office. Currently Northern Technical College staffs are as follow:

- Financial Aid Administrator
- Business Officer Administrator
- School Director
- Receptionist (Volunteer)
- Instructors (2)

## Separation of Duties Procedure

- **Purpose:** To make sure each staff member is adequate to number of students and programs.
- **Responsibilities:**
  - School Director
    - Will evaluate the staff, number of student to determine when and if an increase of staff is needed.

# Administrative Cost Allowances

## Administrative Cost Allowances Policy

Northern Technical College's chart of accounts must identify all general ledger and subsidiary ledger accounts relevant to the Federal Student Aid Programs. In addition, Northern Technical College's accounts, journals, and records must follow federal cash from the moment the funds are drawn

through G5 to when funds are disbursed to students, including when cash is deposited into institutional bank accounts, transferred between bank accounts, posted to general and subsidiary ledger, posted to the individual student account ledgers, and if applicable, disbursed directly to students.

## Administrative Cost Allowances Procedure

- **Purpose:** To make sure all accounts are in compliance with federal aid requirements.
- **Responsibilities:**
  - **Business Office Administrator**
    - Enable timely internal and external financial reporting
    - Meet documentation requirements;
    - Ensure proper filing of applications
    - Create accurate report
    - CPA

Make sure records are reconciled monthly and yearly audit is in compliance with the Department of Education and NACCAS

# 1098-T, 1098-E, IRS Forms 1042 & 1042-s Requirements

1098-T, 1098-E, IRS Forms 1042 & 1042-s Requirements Policy

IRS Form 1098-E

Northern Technical College must provide IRS Form 1098-E, Student Interest Statement, to all individuals who paid student loan interest of \$600 or more on loans held by your school during a calendar year.

### IRS Form 1098-T

Northern Technical College must provide Form 1098-T, Tuition Statement, for each student enrolled for credit and for each student whom a reportable transaction is made.

### IRS Forms 1042 & 1042-s

Northern Technical College is required to meet withholding and reporting requirements for nonresidents. Nonresidents eligible for Title IV aid include asylees, refugees, and parolees. Northern Technical College must generate a 1042-S for each nonresident student receiving taxable income other than wages. This includes Title IV need based aid and other grants or scholarships. Northern Technical College must also prepare a 1042 summarizing the data reported on the individual 1042-S forms. See IRS instructions for forms 1042 and 1042-S for filing requirements

## 1098-T, 1098-E, IRS Forms 1042 & 1042-s Requirements Procedure

### Responsibilities:

- **Business Office Administrator**
  - Contact IRS to order 1098-T and 1042 forms by January 1<sup>st</sup> of each year or as soon as they are available for purchase.
  - Complete all 1098-E forms for all students who paid student interest in excess of \$600.00 or more.
  - Complete 1098-T Tuition statement for each student enrolled for credit and for each student whom a reportable transaction was made.
  - Make copies of all forms for student's files
  - Mail all files to students no later than January 30<sup>th</sup> each year.
  - In the event of unforeseen circumstances, request for an extension

## Federal Bank Account Requirements

### Federal Bank Account Requirements Policy

For each account that contains Federal Student Aid program funds, Northern Technical College who is located in the state of Arkansas must identify that FSA funds are maintained in the account by including the phrase **federal funds** in the name of the account; or notifying the depository institution that the depository account contains Title IV program funds that are held in trust and keeping a copy of this notice in its records and, except for public institutions, filing a Uniform Commercial Code Form (UCC-1) statement with the appropriate state or municipal government entity that discloses that an account contains federal funds. Northern Technical College must keep a copy of the UCC-1 statement in its records.

The Department may require Northern Technical College to maintain Title IV funds in a separate depository account that contains no other funds if the Department determines that the school failed to



comply with: (1) the cash management regulations, (2) The recordkeeping and reporting requirements, or (3) applicable program regulations.

## Federal Bank Account Requirements Procedure

### Responsibilities:

- **Business Office Administrator/Director**
  - Ensure that all bank accounts that receive federal funds are identified as Federal Funds on the account or the account with Title IV
  - Keep copies of its data.

# Default Management Plan

## Default Management Plan Policy

If Northern Technical College has a single CDR equal to or greater than 30% must establish a Default Prevention Task Force and develop a Default Management Plan to reduce defaults and prevent loss of institutional eligibility that:

- Identifies the factors causing the schools CDR to exceed the threshold
- Establishes measurable objectives and identifies steps to improve the CDR.
- Specifies actions the school will take to improve student loan repayment including loan repayment counseling.

## Default Management Plan Procedure

### Responsibilities:

- Admission Administrator
  - Keeps records updated regarding borrowers' addresses, telephone numbers, employers, and employers' addresses.

- If necessary, uses activities such as skip tracing and sending letters "Forwarding and Address Correction Requested" to maintain contact with borrowers who have moved.
- Instructors
  - Decreasing program completion time.
  - Reteaching/Tutoring if on academic probation
  - How to assist students with health problems
  - How to assist students with language problems.
  - Does one program have disproportionate number of defaulters and how to change that?
  - Is transportation a problem?
  - Does the student have financial difficulties and are they financially literate?
- Director/Instructors/FAA
  - Helping non-completers find a job.
  - Assists borrowers who are experiencing difficulty in finding employment through career counseling, job placement assistance, and information about repayment options, including the availability of deferments and forbearances.
- School Director
  - Identifies and allocates the personnel, administrative, and financial resources appropriate to implement the default management plan.
  - Ensures that its admission policies and screening practices only admit students who have a reasonable expectation of succeeding in their program of study.
  - Evaluates and improves, if necessary, its curricula, facilities, materials, equipment, qualifications and size of faculty, and other aspects of its educational program to ensure that borrowers remain in school and that they are employed after they complete their program of study.
- Financial Aid Administrator
  - Establishes a process to ensure the accuracy of data used to calculate its draft and official cohort default rates.
  - Establishes a data collection system to track and analyze borrowers who default on their loans.
  - Defines evaluation methods, sets default reduction targets, and conducts an annual comprehensive self-evaluation of its administration of the Title IV programs to identify institutional practices that should be modified to reduce defaults, and then implements those modifications.
  - Enhances the enrollment retention and academic persistence of borrowers through counseling and academic assistance, especially for academically high-risk students.
  - Understand who is defaulting and why. Create a picture of who is at-risk and what works.
  - If possible, identifies and implements alternative financial aid award policies and develops alternative financial resources to reduce the need for student borrowing.
  - In addition to requirements in 34 CFR 682.604 and 34 CFR 685.304, provides the information listed in the "Enhanced Initial and Exit Counseling" section, on the following page, during initial and exit counseling.
  - If possible, uses interactive electronic materials, audio-visual materials, and written tests during counseling to ensure that borrowers understand the terms and conditions of their loans.

- If borrowers demonstrate that they do not understand the terms and conditions of their loans (for example, by failing a written test), provides additional, more intensive counseling.
- Frequently reviews borrowers' in-school status to ensure that it recognizes instances in which borrowers withdraw without notice
- Contacts borrowers during their grace period to remind them of the importance of the repayment obligation and of the consequences of default.
- Tracks borrowers' delinquency status by obtaining reports from the Department and from FFEL Program guaranty agencies and lenders.
- Exit Counseling
- Information about delinquency and default
- Requesting borrower information
- Director
  - Evaluates and improves, if necessary, its curricula, facilities, materials, equipment, qualifications and size of faculty, and other aspects of its educational program to ensure that borrowers remain in school and that they are employed after they complete their program of study
- All Staff
  - Student success/completion is a key to less default.

# Fiscal and Cash Management

## Fiscal and Cash Management Policy

Northern Technical College's financial management system (including the Northern Technical College's accounting system) provides effective control over and accountability for all funds received from the U.S. Department of Education's (ED's) Grant Administration and Payment System (G5).

### MAINTAINING AND ACCOUNTING FOR FUNDS

All schools must maintain a bank account into which the Department transfers, or the school deposits, SFA program funds. The account must be federally insured or secured by collateral of value reasonably equivalent to the amount of SFA program funds in the account. A school is not required to maintain a separate account for SFA program funds unless the Department specifies otherwise.

A school is not required to maintain a separate bank account for FFEL program funds that the school receives from a lender by EFT. A school must maintain and account for FFEL program funds in the same manner required for other SFA program funds.

Maintaining and Accounting for Funds Cite 34 CFR 668.163

Bank account notification requirements

For each account that contains SFA program funds, a school must identify that SFA program funds are maintained in the account by

- including the phrase federal funds in the name of the account, or
- notifying the bank or investment company of the accounts that contain SFA program funds and keeping a copy of this notice in its records and, except for public institutions, filing an UCC-1 statement with the appropriate state or municipal government entity that discloses that an account contains federal funds.

The school must keep a copy of the UCC-1 statement in its records.

The requirement that a school file a UCC-1 statement when an account's name does not include the phrase federal funds was established to reduce the possibility that a school could misrepresent federal funds as its own funds to obtain a loan or secure credit.

Interest-bearing or investment account

Except in the instances discussed below, the account that Direct Loan, Pell Grant, FSEOG, and FWS program funds are deposited in must be an interest-bearing account or an investment account. An investment account must consist predominantly of low-risk income producing securities. If

a school chooses to maintain federal funds in an investment account, the school must maintain sufficient liquidity in that account to make required disbursements to students.

Any interest earned on Direct Loan, Pell Grant, FSEOG, and FWS program funds maintained in an interest-bearing account or an investment account that exceeds \$250 per year, must be remitted to the Department by June 30 of that award year. A school may keep up to \$250 per year of the interest or investment revenue earned (other than that earned on Perkins Loan funds) to pay for the administrative expense of maintaining an interest-bearing account.

A school is not required to maintain Direct Loan, Pell Grant, FSEOG, and FWS program funds in an interest-bearing account or an investment account for an award year if:

- the school drew down less than \$3 million from these funds in the prior award year and anticipates that it will not draw down more than \$3 million in the current award year;
- the school can demonstrate that it would not earn over \$250 in interest on the funds it will draw down during the award year; or
- the school requests these funds under the just-in-time payment method.

Schools that request funds under the just-in-time payment method are exempt because this method would ensure the expeditious accounting for and disbursement of program funds. Therefore, little or no interest would be earned on funds provided to the school.

## Fiscal and Cash Management Procedure

### Responsibilities:

- Business Office Administrator
  - Maintains student payments in the accounting system
  - Ensures that all disbursements are valid and eligible
  - Ensure proper filing of applications
  - Ensure timely internal and external Financial Aid reporting
  - Keep accurate and auditable records including providing the clear audit trail required by cash management regulations

# Compliance Audits & Audited Financial Statements

## Compliance Audits & Audited Financial Statements Policy

A school that participates in any Federal Student Aid (FSA) program, including a participating foreign school, generally must have an independent auditor conduct an annual audit of the school's compliance with the laws and regulations that are applicable to the FSA programs in which the school participates (a compliance audit), and an audit of the school's financial statements (a financial statement audit).

Northern Technical College participates in a yearly FSA compliance audit conducted under the Inspector General's Audit Guide (for FSA school audits) by a CPA. This audit is submitted to Department Of Education (DOE) annually.

## Compliance Audits & Audited Financial Statements Procedure

### Responsibilities:

- Business Officer Administrator
  - Contacts the CPA by October 1<sup>st</sup> of each year to request documents needed to begin audit
  - Submits the documents to the CPA no later than October 30<sup>th</sup>
  - Submit the completed audit by January 31<sup>st</sup>
  - Wait for Department of Education possible corrections
  - Submit corrections by February 15<sup>th</sup>

# Cash Management Regulations

## Cash Management Regulations Policy

The cash management regulations are intended to promote sound cash management of FSA program funds by schools; minimize the costs to the government of making FSA program funds available to students and schools; and minimize the costs to students who receive FSA loans. Except for funds provided by the Secretary for administrative expenses and funds used for the Job Location and Development Program under 34 CFR part 675, subpart B, funds received by an institution under the Title IV programs are held in trust for the intended beneficiaries. **The school, as a trustee of those funds, may not use the funds as collateral or**

**engage in any practice that risks the loss of those funds. Moreover, a school must exercise the level of care and diligence required of a fiduciary in managing Title IV program funds.** To ensure adequate cash management practices, a school must have in place a cash management system that adheres to federal regulations and other standards. A school's cash management practices are governed by:

Generally Accepted Accounting Principles (GAAP),  
standards prescribed by the federal Office of Management and Budget (OMB),  
U.S. Department of Treasury regulations, and  
U.S. Department of Education (ED/the Department) regulations.

### **Requesting Funds**

Northern Technical College utilizes a federal third-party servicer (FAME) to provide services to process Financial Aid data, provide training, and make sure the institution is in compliance with the federal regulation and policies.

### **Managing Excess Cash**

A school must disburse funds no later than three business days following the date the school receives them. The department considers excess cash to be any amount of FSA funds, other than Perkins Loan funds, that a school does not disburse to students or parents by the end of  
Of the third business days following the date the school

- Received those funds from the Department; or
- Deposited or transferred to its depository account previously disbursed FSA funds received from the Department, such as those resulting from award adjustments, recoveries, or cancellations.

If a school cannot disburse funds in the required three days because of circumstances outside the school's control. (change in student enrollment status, student's failure to attend classes as scheduled, or a change in a student's award as a result of verification. In view of these circumstances, a school may maintain some excess cash for up to seven additional days if the excess cash does not exceed 1% of the total amount of funds the school drew down in the prior award year. The school must return immediately to the Department of Education any amount of excess cash over the 1% tolerance and any amount remaining in its account after the seven-day tolerance period.

Where excess cash balances are disproportionately large or where they represent a continuing problem with school's ability to responsibly administer the FSA program, the Department may initiate a proceeding to fine, limit, suspend, or terminate the school's participation in one or more of the FSA programs.

### **Returning Funds to the Department of Education**

For Funds electronically transmitted by the Department, the three-day period begins on the day the school receives the funds in the account designated by the school for that purpose.

- As part of the school's compliance with the requirement to return funds if a student withdraws before completing a period for which she was paid;
- That are Pell Grant funds deposited because of adjustments to the student's award and Direct Loan funds deposited because of adjustments or cancellations; and
- Because a student failed to begin attendance—

The three-day period begins on the date the school deposits the funds in its federal account.

A school must return or deposit funds for a student who failed to begin attendance no later than 30 days after the date the school becomes aware that the student did not begin and will not begin attendance.

A school must return aid for a student who withdraws before completing a period for which the student was paid within 45 days of determining the student withdrew.

## Cash Management Regulations Procedures

### Responsibilities

- Business Administrator
  - Request funds from the Third Party Server (FAME)
  - Disburse funds to eligible student and parent
  - Manage excess cash
  - Return funds to the Department of Education
  - Reconciliation
  - Report the activities to FAME

## Internal Controls

### Internal Controls Policy

The Internal Control at the institution is a system of check and balances. The institution has a well-organized financial aid office member who has been trained by FAME and the State Department of Education. The school's plan of organization and all the policies, procedures, and actions taken by the school to provide reasonable assurance that the school will achieve its objectives in the following areas:

1. Effectiveness and efficiency of operations
2. Accuracy of operating data
3. Reliability of program reporting



4. Protection of funds against fraud and misuse

5. Compliance with organizational policies and applicable FSA laws and regulations.

The school's administrative objectives, including performance and financial goals and safeguarding of resources addresses the internal control. The decisions made by the institution on its day-to-day operations are based on accurate information. The institution preparation of financial statements, audits, and other fiscal and operational reports a school is required to make to the Department. The school's fiduciary responsibility is to safeguard FSA funds and ensure they are used for the purposes and by the recipients intended. The school complies with all applicable federal, and state, laws and regulations, as well as the regulations of its accrediting agency. The institution utilizes a local auditor, eZ audit and FAME to make sure the school is in compliance and safeguarding FSA funding. The components are:

- ◆ **Control Environment**—the control environment sets the tone of an organization and influences the mind-set of its employees. It is the foundation for all other components of internal control, providing its discipline and structure. Control environment factors include the integrity, ethical values, and competence of the school's people; management's philosophy and operating style; and the way a school's administration assigns authority and responsibility and organizes and develops its employees.
- ◆ **Risk assessment**—every entity faces a variety of risks from external and internal sources. Risk assessment is the identification and analysis of risks that have the potential to negatively affect a school's satisfactory management of the FSA programs, its financial strength, its public image, and the overall quality of its programs and services.
- ◆ **Information and communication.** Pertinent information must be identified, captured, and communicated in a form and time frame that enables employees to carry out their responsibilities.
- ◆ **Monitoring**—Internal control systems need to be monitored— a process that assesses the quality of the system's performance over time. This can be accomplished through ongoing monitoring activities, separate evaluations, or a combination of the two.
- ◆ **Control Activities**—Control activities are the policies and procedures that help ensure a school's administrative directives are followed. They help guarantee that the actions necessary to reduce risk are carried out.

## Internal Controls Procedures

- Responsibilities
  - Business Office Administrator
    - Follow the rules and safeguard funding
    - Authorize and disburse funds

# Overtime Charges/Over Contract Charges

## Overtime Charges/Over Contract Charges Policy

It is the policy of Department of Education (DOE) not to use Title IV funds to pay overtime charges for a student who fails to complete his or her academic program within the normal time frame. Section 472 of the HEA defines cost of attendance as the tuition and fees normally assessed a student carrying the same academic workload required of all students in the same course of study. If a student does not complete their course in the timeframe allotted, they will be charged an additional fee to complete, however Title IV funds may not be used to pay the additional fees.

## Overtime Charges/Over Contract Charges Procedure

### Responsibilities:

- School Director
  - Oversees the attendance hours of all students
  - Conferences students on their time and half and absences
  - Alerts the Financial Aid and Business office of students who are in need of additional time and possible fees.
- Business Office Administrator
  - Update charges to ledger card of fees due to additional time needed
  - Issue invoices to students
  - Collect payments for additional time

# Student Ledger Procedure for Posting

## Student Ledger Procedure for Posting Policy

Northern Technical College's business office is responsible for most financial accounting and recordkeeping (except for the detailed records and files on individual financial aid recipients that must be kept in the financial aid office). The remainder of this chapter is designed to help the business office satisfy its accounting responsibilities efficiently and with a minimum of effort.

The business office is responsible for posting to all student ledger cards and maintain accurate records with a detailed description (Sub, Unsub, Pell) of the type of payment posted to the students account. The accounting records and systems for FSA funds must provide a clear audit trail that makes it possible to trace all federal cash from drawdown to its final destination. Any student who receives Title IV funds, the school must maintain a student ledger that clearly identifies the date and amount of each transaction, and the balance after each.

## Student Ledger Procedure for Posting Procedure

### Responsibilities:

- Business Office Administrator
  - As payments are submitted (cash) payments are posted to student ledger within in 24 hours of making the payment
  - Issue out recipes via email or printed copies as requested
  - As disbursements are made, it is posted to student ledger cards.
  - Notification are issues to Educational Compliance Management and students via email
  - Copies of student ledger cards are printed for Financial Aid folders

## Awarding Policies and Procedures

### Awarding Policies and Procedures Policy

Northern Technical College award policies and procedures as needed to support the services required by governmental and accrediting agencies. These policies are written and shared with parties of interest to ensure that the applicable persons are training implementing them within their departments. These policies and procedures are maintained in hard copies which are issued to appropriate personnel. They are reviewed and updated as new polices are issued through the FAME, ifap.ed.gov. and COE, BOR, DOE, and other training entities.

### Awarding Policies and Procedures Procedure

#### Responsibilities:

- School Director
  - Create Policies and Procedures as needed or required
  - Review polices yearly or as needed or required
  - Issue polices to specified personnel
  - Train staff as needed to new policies and regulations
  - Supervise and monitor the implementation of policies within all departments

\*\*\*Northern Technical College does not have any Campus Based Programs at this time.