

**Policy Name:** Federal Financial Aid Administration  
**Policy Number:** ADM 4.01  
**Title of Policy Owner:** Chief Financial Officer  
**Policy Type:** RHEI/Shared Services BSMCON SCHS SOMI  
**Approved by:** RHEI Leadership Team  
**Effective Date:** 8/1/2023  
**Version:** 3.0  
**Policy Status:** Approved

**I. Policy**

It is the policy of Bon Secours Memorial College of Nursing (BSMCON), which provides higher education in nursing, to administer federal financial aid programs in accordance with the requirements of Title IV - Higher Education Act of 1965, as amended (Title IV Regulations).

**II. Purpose**

The purpose of this policy is to establish roles and responsibilities, internal controls, procedures, and deadlines for the participation in Title IV Financial Aid programs. Continued access to Title IV Financial Aid funds is a vital resource for BSMCON students as a means to finance their education. BSMCON is committed to ensuring compliance with Title IV Regulations so that access to Title IV programs is not jeopardized.

**III. Scope**

This is an institutional policy that applies to BSMCON.

**IV. Definitions**

**Administrative Capability** – is how BSMCON provides reassurance to the U.S. Department of Education (ED) that it is capable of administering Title IV Financial Aid funds with regards to requirements listed in 34 CFR § 668.16.

**Business Office** - collectively refers to BSMCON Director of Finance, Bursar and Senior Accountant, who are responsible for the timely and accurate maintenance of Student Accounts, fiscal reporting requirements and reconciliation of Title IV Financial Aid funds.

**Central Processing System (CPS)** – is the U.S. Department of Education’s (ED) application data processing center. CPS uses student information from the FAFSA processors to calculate the student’s official EFC. CPS returns the student’s eligibility information to the student via the Student Aid Report (SAR) and to the institution (BSMCON) via the Institutional Student Information Record (ISIR).

**Cost of Attendance (COA)** – is the anticipated cost that a student may incur during an academic year to attend college. COA typically includes costs for Tuition and Fees, books, course materials, supplies & equipment, living expenses,

transportation, personal and professional credential (i.e. NCLEX) expenses. . COA does not reflect the actual charges that a student will incur. COA is published annually on the BSMCON website.

**Expected Family Contribution (EFC)** – is an estimate of the family’s (student and/or parents) ability to contribute financially to postsecondary education expenses. It is a measure of the family’s financial strength which is derived from information submitted in the Free Application for Federal Student Aid (FAFSA). EFC is calculated by the U.S. Department of Education (ED) Central Processing System (CPS) based on a formula established by law based on financial and household information. EFC is reported to the student on the Student Aid Report (SAR) and to BSMCON in the Institutional Student Information Record (ISIR). BSMCON uses EFC to determine Title IV Financial Aid eligibility and amount of any such award(s). EFC is not the amount of money that a family will pay, nor is it the amount of Title IV Financial Aid that a student will receive.

**Federal Pell Grant** – is a federal grant that provides Need-based funds to low-income undergraduate and certain post-baccalaureate students to promote access to postsecondary education. Federal Pell Grant award amounts are dependent on the student’s EFC, COA, Enrollment Status and whether the student attends for a full academic year or less. Year-Round-Pell is offered to students who meet certain eligibility requirements. Federal Pell Grant is authorized by Title IV of the Higher Education Act of 1965, as amended.

**Financial Aid** - any source of financial funding to defer a student's Cost of Attendance (COA). Examples of Financial Aid may include, but are not limited to, Title IV Funds (Federal Pell Grant, Federal Supplemental Educational Opportunity Grant (FSEOG) Federal Work Study (FWS), Federal Direct Loans (Subsidized, Unsubsidized and Parent PLUS), Scholarships, Third Party Payors, etc.

**Financial Aid Office** - collectively refers to BSMCON Director of Financial Aid, Financial Aid Specialist and Financial Aid Counselor, who are responsible for the timely and accurate awarding, scheduling, and reconciliation of Financial Aid.

**Financial Refund** - denotes that some form of payment has taken place between the student (or related party initiated by or on the behalf of the student) and BSMCON for which a subsequent event occurs that results in the payment being returned to the student (or related party), as further defined in ADM 5.01 Financial Refund policy.

**Institutional Eligibility** – refers to the establishment and maintenance of eligibility of an institution (BSMCON) to be permitted to administer Title IV Programs as established in 34 CFR § 668.16.

**Institutional Student Information Record (ISIR)** – is a summary of information from the student’s FAFSA submitted to BSMCON. ISIRs and SARs contain the same information in different formats.

**Professional Judgement** - is a provision of law under Title IV – Higher Education Act of 1965, as amended, that allows Financial Aid administrators to make adjustments to

Financial Aid eligibility based on a student's special circumstance(s).. Professional Judgement is categorized into 1) Special Circumstances in which a financial situation (i.e. loss of a job) justifies the Financial Aid administrator to adjust certain elements in the COA or EFC calculation and 2) Unusual Circumstances in which a condition exists that justifies the Financial Aid administrator to adjust a student's dependency status (from dependent to independent) based on unique situations (i.e. human trafficking, refugee or asylee status, parental abandonment, incarceration, etc.), which is commonly referred to as a dependency override. Instances of Professional Judgement are rare and additional documentation is required.

**Semester** - the standard measurement used to group weeks of instructional time in the academic year. Semester is generally referred to as period of enrollment and includes fall, spring, and summer. For purposes of Title IV, Semester is also the term denoting a Payment Period.

**Student Accounts** - collectively refers to a student specific record of all pending, scheduled or posted financial transactions over the duration of program enrollment. Student Accounts is generally referred to as transactions contained within the Registration Bill (generally pending or anticipated transactions) and Student Ledger Card (posted transactions).

**Title IV Credit Balance** – is a negative (credit) balance that occurs when there is an excess of Title IV Funds when applied to Tuition and Fees assessed to the Student Account within a Semester.

**Title IV Financial Aid** – generally, as it pertains to BSMCON, includes, but is not limited to Federal Pell Grant, Federal Supplemental Educational Opportunity Grant (FSEOG), Federal Work Study (FWS) and Federal Direct Loans (Subsidized, Unsubsidized and Parent PLUS), which represent the Title IV programs that BSMCON administers.

**Title IV Regulations** - requirements imposed under Title IV of the Higher Education Act of 1965, as amended that institutions must comply with in order to participate in Title IV programs.

**Verification** – is the process by which an applicant's FAFSA information is selected by CPS or BSMCON to be verified as accurate (true and complete within certain parameters) or inaccurate, as further defined by ADM 4.03 Federal Financial Aid Verification and Conflicting Data policy.

## V. Policy Details

### A. Designation of a Responsible Party

The Chief Financial Officer is responsible for monitoring compliance with the requirements of this policy and applicable Title IV Regulations.

## **B. Institutional Eligibility**

BSMCON is a postsecondary educational institution that is approved to participate in student financial assistance programs authorized by Title IV of the Higher Education Act of 1965, as amended. As such, BSMCON must maintain Institutional Eligibility and demonstrate Administrative Capability in order to maintain access to and participate in Title IV Programs. Further, BSMCON understands and agrees to comply with all Title IV (and other) Regulations including, but not limited to, general provisions and regulations as set forth in 34 CFR Part 600, Parts 668-690.

BSMCON entered into a Program Participation Agreement (PPA) with the United States Secretary of Education to administer Title IV programs offered by the U.S. Department of Education (ED) and is subject to the terms and conditions set forth in that agreement. The PPA applies to all locations and programs that are indicated on the most current Eligibility and Certification Approval Report (ECAR) issued by the ED. The Chief Financial Officer is responsible for updating, maintaining, and retaining ED agreements and reports. BSMCON utilizes the Electronic Application for Approval to Participate (E-APP) system to update such documentation filed with the ED and retains documentation in accordance with Title IV Regulations and ADM 1.04 Records Management policy.

## **C. Administrative Capability**

BSMCON is required to exhibit and maintain Administrative Capability with respect to Title IV programs. These provisions include, but are not limited to, maintaining an adequate number of qualified persons to administer Title IV Financial Aid, demonstrating adequate checks and balances, establishing, publishing, and applying reasonable standards with respect to Satisfactory Academic Progress (SAP), resolving Conflicting Data, preparing, and submitting fiscal reports and financial statements and providing Financial Aid counseling for students.

The Finance team is comprised of the Chief Financial Officer, who oversees the Financial Aid Office and Business Office. As such, the Chief Financial Officer annually evaluates the number of associates within each office to ensure that adequate staffing is maintained, sufficient training and education opportunities with respect to Title IV Regulations is provided and that associates possess sufficient knowledge in order to ensure compliance with Title IV Regulations related to Administrative Capability. While both the Financial Aid Office and Business Office play an integral part in maintaining compliance with Title IV Regulations, there is separation of duties with respect to each office, as well as internal controls in existence to further ensure that proper checks and balances exist.

In accordance with Title IV Regulations, students must maintain Satisfactory Academic Progress (SAP) in order to maintain access to Title IV Financial Aid. SAP, as it relates to Title IV Financial Aid eligibility, is discussed in detail and further outlined in ADM 2.06 Satisfactory Academic Progress policy. As an administrator of Title IV Financial Aid programs, the BSMCON Financial Aid Office is required to identify and resolve any discrepancies in information, also referred to as Conflicting Data, that it receives from various sources with respect to a student's application for and/or eligibility to receive

Title IV Financial Aid. In addition, CPS and/or the Financial Aid Office may require that a process called Verification be completed prior to awarding Title IV Financial Aid. Further, the Financial Aid Office is required to clear any C-Codes as indicated on the Institutional Student Information Record (ISIR) for items such as citizenship, prior student loan default, unusual enrollment history (UEH), etc. in accordance with Title IV Regulations prior to awarding Title IV Financial Aid. The ADM 4.03 Federal Financial Aid Verification and Conflicting Data policy further outlines such circumstances.

The Business Office is responsible for the accurate and timely maintenance of fiscal and cash management records. Fiscal responsibility activities include, but are not limited to, maintaining all elements that comprise Student Accounts as further defined in ADM 4.04 Student Accounts policy, processing Financial Refunds in accordance with ADM 5.01 Financial Refunds policy, submitting annual financial statements and compliance audits via the ED's eZ-Audit system, maintaining appropriate documentation with regards to the receipt and expenditures of Title IV Financial Aid funds, reconciling Title IV Financial Aid funds, preparing and submitting the annual Fiscal Operations Report and Application to Participate (FISAP) in Campus-Based Programs, etc. The Business Office retains records as further described in ADM 1.04 Records Management policy.

**VI. Attachments**

None

**VII. Related Policies**

ADM 1.04 Records Management  
ADM 2.06 Satisfactory Academic Progress  
ADM 3.01 Family Education Rights & Privacy Act (FERPA)  
ADM 4.02 Federal Financial Aid Programs  
ADM 4.03 Federal Financial Aid Verification & Conflicting Data  
ADM 4.04 Student Accounts  
ADM 4.06 Book Advance Program  
ADM 4.07 Establishing Principles of Excellence - Military  
ADM 4.08 BSMCON Scholarships  
ADM 5.01 Financial Refund

ADM 10.01 Communications

**VIII. Disclaimers**

Nothing in this policy creates a contractual relationship between Bon Secours Memorial College of Nursing (BSMCON) and any party. BSMCON, in its sole discretion, reserves the right to amend, terminate or discontinue this policy at any time, with or without advance notice.

**IX. Version Control**

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Version	Date	Description	Prepared by
1.0	06/20/2020	Rewrite to combine multiple policies into one. New template	Dean of Finance
2.0	06/10/2022	Update for Chief Financial Officer and related policies	Chief Financial Officer
3.0	05/01/2023	New template. Revisions to Definitions for COA & PJ	Chief Financial Officer