Policy Title	Federal Financial Aid Administration
Policy Number:	ADM 4.01
Department:	BSMCON
Functional Area:	Finance
Contributing Department	
Approved by:	RHEI Leadership Team
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Manual	To be entered by Compliance360 System administrators or N/A if not in C360
Section	ADM 4

I. Mission, Vision, and Values

This policy reflects our commitment to human dignity, integrity, compassion, stewardship, and service by guiding decisions and actions that uphold respect for all individuals and promote excellence in our work.

This policy aligns with our mission of extending the compassionate ministry of Jesus by improving the health and well-being of our communities and providing good help to those in need, especially the poor, dying, and underserved by ensuring that our practices support ethical, effective, and accountable service across all areas of the organization.

II. Policy

It is the policy of Bon Secours Memorial College of Nursing (BSMCON), a department operated and controlled by Bon Secours Memorial Regional Medical Center, LLC, 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).

III. Purpose

The purpose of this policy is to establish roles and responsibilities, internal controls, procedures, and deadlines for 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.

IV. Scope

This is an institutional policy that applies to BSMCON.

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 FSA Partner Connect to update its eligibility application and related documentation that is filed with the ED and retains such 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, Financial Aid Office, and Business Office. 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 (SAP) policy. As an administrator of Title IV Financial Aid programs, the 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, the FAFSA Processing System (FPS) 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 comment (C) Codes or Flags 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 FSA Partner Connect 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. 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 the 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.

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 in the BSMCON College Catalog and on the website.

Enrollment Intensity

Is the percentage of Full-Time enrollment for which the student is enrolled, rounded to the nearest whole percent, in any given Semester or Term (Module). BSMCON considers Full-Time enrollment as twelve (12) or more credits per Semester, or six (6+) or more credits per Term (Module). Enrollment Intensity (not Enrollment Status) is used in the calculation of a student's Federal Pell Grant award. Enrollment Intensity only applies to Federal Pell Grant eligibility.

Enrollment Status

Is indicative of how many credits a student is enrolled in during a Semester or Term (Module). Enrollment Status for a Semester is Full-Time (12+ credits), Three-Quarter Time (9-11 credits), Half-Time (6-8 credits) and Less Than Half-Time (less than 6 credits). Enrollment Status for a Term (Module) is Full-Time

(6+ credits), Three-Quarter Time (5 credits), Half-Time (3-4 credits) and Less Than Half-Time (less than 3 credits).

FAFSA Processing System (FPS)

Is the U.S. Department of Education’s (ED) application data processing center. FPS processes information from the Free Application for Federal Student Aid (FAFSA) and produces two (2) reports: FAFSA Submission Summary (FSS) which is distributed to students and Institutional Student Information Record (ISIR) distributed to institutions (BSMCON).

FAFSA Submission Summary (FSS)

This is a summary of information from the student's FAFSA submission. The student receives a FSS, and the institution (BSMCON) receives an Institutional Student Information Record (ISIR). FSSs and ISIRs contain the same information in different formats.

Federal Pell Grant

It is a federal grant that provides Need-based funds to low-income Undergraduate and certain post-baccalaureate students to promote access to post-secondary education. Students may qualify for a Federal Pell Grant in one (1) of three (3) ways: 1. Maximum Pell Grant (Max Pell), 2. Minimum Pell Grant (Min Pell), or 3. Calculated Federal Pell Grant. Federal Pell Grant award amounts are dependent on the student’s SAI, COA, Enrollment Intensity, and whether the student attends for a full Academic Year or less. Year-Round-Pell is offered to students who meet certain eligibility requirements.

Graduate and professional students are not eligible for Federal Pell Grant funds.

Financial Aid

Is 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 Financial Aid - 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 the 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.

Graduate (student)

Is a student who has already obtained a bachelor's degree and is pursuing an advanced (master) degree in a specialized field of study (i.e., DE-MSN).

Institutional Eligibility

Referring 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)

This is a summary of information from the student's FAFSA submission. ISIRs and FSSs 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 SAI 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

Is the standard measurement used to group weeks of instructional time in the academic year. Specific to Undergraduate (i.e., Pre-Licensure BSN and Post-Licensure RN-BSN) students, a Semester is generally a period of enrollment that includes fall and spring (16-17 weeks) and summer (8 weeks). For Title IV purposes, a Semester also denotes 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 generally refers to transactions contained within the Registration Bill (generally pending or anticipated transactions) and Student Ledger Card (posted transactions). Further information can be obtained in ADM 4.04 Student Accounts policy.

Student Aid Index (SAI)

It is an eligibility index number that is used to determine the financial resources available to contribute to a student's postsecondary education expense. SAI is calculated by the U.S. Department of Education (ED) FAFSA Processing System (FPS) based on formulas that are established by law. SAI is calculated from information submitted in the Free Application for Federal Student Aid (FAFSA), and federal tax information (FTI) that is retrieved directly from the Internal Revenue Service (IRS). SAI is reported to the students on the FAFSA Submission Summary (FSS) and to BSMCON via the Institutional Student Information Record (ISIR). BSMCON uses the SAI, among other information, to determine Financial Aid eligibility and the amount for such award(s). SAI is not the amount of money that a student (or family) will, or is expected to, pay, nor is it the amount of Financial Aid that a student will receive. SAI replaced Expected Family Contribution (EFC). Unlike EFC, SAI may be a negative number, as low as ($1,500).

Term (Module)

It is specific to Graduate (i.e., DE-MSN) students and is an eight (8) week period of enrollment and instructional time. For Title IV purposes, Term (Module) also denotes a payment period.

Title IV Credit Balance

There is a negative (credit) balance that occurs when there is an excess of Title IV Funds when applied to Tuition and Fees (or Other Charges) assessed to the Student Account within a Semester or Term (Module).

Title IV Financial Aid

Is federal Financial Aid authorized by Title IV of the Higher Education Act of 1965, as amended. Title IV programs that BSMCON participates in includes Federal Pell Grant, Federal Supplemental Educational Opportunity Grant (FSEOG), Federal Work Study (FWS) and Federal Direct Loans (Subsidized, Unsubsidized and Parent PLUS.

Title IV Regulations

Requirements imposed under Title IV of the Higher Education Act of 1965, as amended, that institutions must comply with to participate in Title IV programs. Title IV Regulations include, but are not limited to, the FAFSA Simplification and FUTURE Acts, as amended, which were predominantly implemented during the 2024-25 Academic Year.

Undergraduate (student)

Is a student who is pursuing a first-level degree (bachelor) in a field of study (i.e., Pre-Licensure BSN and Post-Licensure RN-BSN).

Verification

Is the process by which an applicant's FAFSA information is selected by FPS 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.

VII. Attachments

N/A

VIII. Related Policies and Procedures

ADM 1.04 Records Management
ADM 2.06 Satisfactory Academic Progress (SAP)

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 -Voucher
ADM 4.07 Establishing Principles of Excellence - Military
ADM 4.08 BSMCON Scholarships
ADM 5.01 Financial Refunds
ADM 10.01 Communications

IX. Regulatory Notices

Nothing in this policy creates a contractual relationship between Bon Secours Memorial College of Nursing (BSMCON), a department operated and controlled by Bon Secours Memorial Regional Medical Center, LLC, 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.

X. Version Control

Version	Effective Date	Next Review Date	Description	Supersedes, if applicable	Prepared By
1.0	6/20/2020	N/A	Rewrite to combine multiple policies into one. New template	N/A	Dean of Finance
2.0	6/10/2022	N/A	Update for Chief Financial Officer and related policies	1.0	Chief Financial Officer
3.0	5/1/2023	N/A	New template. Revisions to Definitions for COA & PJ	2.0	Chief Financial Officer
4.0	4/10/2024	N/A	Revisions and updates to definitions and processes related to the FAFSA Simplification and/or FUTURE Acts, as amended	3.0	Chief Financial Officer

5.0	5/19/2025	5/19/2026	Removed Academic Year 2024-25 references and revised terminology to properly reflect changes made in prior year in relation to the FAFSA Simplification and/or FUTURE Act, as amended.	4.0	Chief Financial Officer
6.0	8/01/2026	5/01/2027	Update for DE-MSN program and 8-week Term (Module)	5.0	Chief Financial Officer
1	8/1/2026	5/01/2027	Version Changed – BSMH Template Adopted	5.0	Chief Financial Officer

This policy/procedure/guideline is not intended to establish a standard of clinical or non-clinical care or practice. Rather, this policy/procedure/guideline creates a general tool to help guide decision-making with the understanding that different action(s) may be necessary in response to the totality of the circumstances presented.

Sites revised 05/06/2025- Bon Secours Mercy Health adopts the above policy, procedure, policy & procedure, guideline, manual / reference guide / instructions, or principle / standard / guidance document for all Bon Secours Mercy Health entities including, but not limited to, facilities doing business as Mercy Health – St. Vincent Medical Center, St. Vincent – St. Charles Hospital, St. Vincent – St. Anne Hospital, Mercy Health – Perrysburg Medical Center, Mercy Health – Tiffin Hospital, Mercy Health – Willard Hospital, Mercy Health – Defiance Hospital, Mercy Health Allen Hospital LLC, Mercy Health - Lorain Hospital, Mercy Health St. Elizabeth Youngstown Hospital, Mercy Health St. Joseph Warren Hospital, Mercy Health - St. Elizabeth Boardman Hospital, Mercy Health - St. Rita's Medical Center, Mercy Health – Springfield Regional Medical Center, Mercy Health - Urbana Hospital, Mercy Health - Anderson Hospital, Mercy Health - Clermont Hospital, Mercy Health – Fairfield Hospital, Mercy Health - West Hospital, The Jewish Hospital – Mercy Health, Mercy Health – Kings Mills Hospital, LLC, Mercy Health - Lourdes Hospital LLC, Mercy Health – Marcum and Wallace Hospital, Chesapeake Hospital Corporation DBA Rappahannock General, Maryview Hospital, Bon Secours Richmond Community, Bon Secours Memorial Regional Medical Center, Bon Secours – St. Mary's Hospital, Bon Secours St. Francis Health System, Bon Secours St. Francis Medical Center, Bon Secours Mary Immaculate Hospital, Bon Secours - Southside Medical Center, Bon Secours Mercy Health Franklin, LLC, Southern Virginia Medical Center, and Bon Secours Harbour View Medical Center. This also may apply to Bon Secours Mercy Health Medical Group LLC and its medical group affiliates.