

## **POLICY FA3 – Federal Financial Aid Program Administration (Certificate)**

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Policy Name: Federal Financial Aid Program Administration  
Policy Category & Number: FA3  
Person Responsible: Chief Financial Officer  
Approved by: Dean  
Effective Date: 8/1/2022  
Version: 1.0  
Policy Status: Approved

### **I. Policy:**

It is the policy of Bon Secours St. Mary's Hospital School of Medical Imaging (SOMI), which provides higher education in medical imaging, to administer federal financial aid programs in accordance 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 SOMI students as a means to finance their education. SOMI 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 all SOMI certificate students.

### **IV. 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.

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### **B. Institutional Eligibility**

SOMI 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, SOMI must maintain Institutional Eligibility and demonstrate Administrative Capability in order to maintain access to and participate in Title IV Programs. Further, SOMI 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.

SOMI 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. SOMI 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 G17: Records and Private Communications policy.

### **C. Administrative Capability**

SOMI 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

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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 A8 Satisfactory Academic Progress policy. As an administrator of Title IV Financial Aid programs, the SOMI 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 FA4 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 FA7 Student Accounts policy, processing Financial Refunds in accordance with FA5 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, etc. The Business Office retains records as further described in G17 Records and Private Communications policy.

### **V. Definitions**

**Administrative Capability** – is how SOMI provides reassurance to the 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 Director of Finance, Bursar and Senior Accountant, who are responsible for the timely and accurate maintenance of Student

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Accounts, fiscal reporting requirements and reconciliation of Title IV Financial Aid funds.

**Central Processing System (CPS)** – is the Department of Education's 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 SAR and to the institution (SOMI) via the 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, room and board, books, supplies, travel, and personal costs. COA does not reflect the actual charges that a student will incur. COA is published annually on the SOMI website.

**Federal Pell Grant** – is a Federal grant offered to undergraduate students who have not received a bachelor degree or first professional degree and demonstrate the greatest financial need. 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 Direct Loans (Subsidized, Unsubsidized and Parent PLUS), Scholarships, Third Party Payors, etc.

**Financial Aid Office** - collectively refers to 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 SOMI for which a subsequent event occurs that results in the payment being returned to the student (or related party), as further defined in FA5 Financial Refund policy.

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

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**Institutional Student Information Record (ISIR)** – is a summary of information from the student's FAFSA submitted to SOMI. 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 individual adjustments or overrides of a student's Dependency Status (from Dependent to Independent), to adjust the components of a student's COA and to adjust the data elements used to calculate the student's EFC. 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 SOMI, includes, but is not limited to Federal Pell Grant, and Federal Direct Loans (Subsidized, Unsubsidized and Parent PLUS), which represent the Title IV programs that SOMI 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 SOMI to be verified as accurate (true and complete within certain parameters) or inaccurate, as further defined by FA4 Federal Financial Aid Verification and Conflicting Data policy.

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### VI. Attachments

### VII. Related Policies

A8 Satisfactory Academic Progress  
FA1 Federal Financial Aid Programs  
FA2 Book Advance  
FA4 Federal Financial Aid Verification and Conflicting Data  
FA5 Financial Refund  
FA7 Student Accounts  
G17: Records and Private Communications policy.

### VIII. Disclaimers:

- a. Nothing in this policy creates a contractual relationship between Bon Secours St. Mary's Hospital School of Medical Imaging (SOMI) and any party. SOMI, in its sole discretions, reserves the right to amend, terminate or discontinue this policy at any time, with or without advance notice.

### IX. Version Control

Version	Date	Description	Prepared by
1.0	08/01/22	Update to Chief Financial Office	Chief Financial Officer