

FLORIDA COLLEGE OF INTEGRATIVE MEDICINE

Financial Aid Policies & Procedures

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I. INTRODUCTION

Federal regulations mandate that institutions have written policies and procedures. Beyond the federal requirement, there are many benefits to having a written document outlining financial aid office policies and procedures: 1) for distribution to appropriate others outside the Financial Aid Office for the purpose of informing and fostering an understanding of the complexity and operation of the Financial Aid Office; 2) for Financial Aid Office staff as a referral guide to assist in maintaining consistency in the problem-solving process; and 3) as an important component of a comprehensive training program.

STATEMENT OF PURPOSE

The purpose of this document is to record policies and procedures surrounding the delivery of financial aid at Florida College of Integrative Medicine (“FCIM” or “College”). Specifically, it:

- Provides the financial aid staff with current policies and procedures surrounding federal, state and institutional programs.
- Provides each staff member with the general responsibilities of the total staff and the office’s relationship to other departments/divisions of the school.
- Provides each staff member with general office procedures ensuring that similar situations would be handled consistently.
- Provides quick reference to various programs, problems, forms, rules and regulations.
- Provides a clear understanding of policy, authority and responsibility in matters relating to operational practices.
- Provides orientation and training materials for new personnel.

FINANCIAL AID REFERENCE DOCUMENTS

There are many resource guides that assist the Office of Financial Aid staff. These citations are maintained in the Director’s office in volumes and are available to staff members.

The documents which are used to determine students’ eligibility for financial aid include current regulations published in the Federal Register, Department of Education guides (such as the Federal Student Financial Aid Handbook, Verification Guide, formula books, and Audit Guide), Dear Partner Letters, financial aid legislation and other laws or regulations that impact student aid.

This Policies and Procedures Manual does not include all details of the administration of financial aid programs and the related references should be used for in-depth clarity.

II. FINANCIAL AID PHILOSOPHY AND OBJECTIVES

The objectives of the Financial Aid Office revolve around the major functions of the office. Those functions include: 1) awarding and setting up for disbursing of funds; 2) reporting at the institutional, state and federal levels; 3) providing a satisfying, open-door policy to assist students.

PURPOSE

The FCIM Office of Financial Aid offers scholarships, grants, federal student loans, and federal work study employment opportunities. This is for qualified, deserving students who can benefit from further education, but who lack financial resources to continue their education. Aid is granted according to individual need as determined by the Free Application for Federal Student Aid (FAFSA).

PHILOSOPHY

We believe that a consistent and equitable approach to the awarding of financial aid will enable students to attend FCIMI who would not otherwise have the financial resources to enroll. It, therefore, encourages a student population that is culturally, economically, socially and geographically diversified.

GOALS

The primary goal of the Office of financial aid at FCIM is to provide financial means by which a student can continue his/her education. The financial aid programs at FCIM are administered according to the following principles:

- The primary responsibility for financing education lies with the student and his/her family. When the total resources they can provide do not meet their educational expenses, FCIM will guide students and assist them with seeking alternate funds for their post-secondary education.
- Interested individuals will be made aware throughout the year of financial aid opportunities. A student must submit a FAFSA application each year in which he or she expects to be considered for financial aid. A confidential financial aid package will be developed and offered to the student based on individual need and circumstances, but without regard to age, sex, race, color, religion, national origin or handicap.
- Planning/counseling sessions are important and help students plan for the most efficient use of financial aid and the student's resources for education. They are held on an as-needed basis with any student.
- The Office of Financial Aid at FCIM operates within federal and state guidelines and other standards of individual aid programs.

III. GENERAL FINANCIAL AID OFFICE ADMINISTRATION OFFICE HOURS

The Financial Aid Office is located in the main administration building across from Classroom 1. It is normally open and available to serve students from 9:00 a.m. to 5:00 p.m. Monday through Friday. Hours on holidays and during student breaks may vary.

CORRESPONDENCE

General correspondence is routed to the appropriate personnel. When appropriate,

correspondence should be responded to within one week. If a staff member is responding to a specific concern, it is standard procedure for the staff member to have the Director review the correspondence. This allows the Director to be aware of potential problems.

TELEPHONE

Telephone calls are answered in a friendly and professional manner. Typically, each staff member answers his or her incoming calls. If the caller requires specific information, the staff member should screen the call thoroughly and transfer the information and caller to the appropriate individual.

DISTRIBUTION OF FORMS

General financial aid forms and information are distributed from the Office of Financial and via the Financial aid pages on FCIM website.

STAFF MEETINGS

Office customer service meetings are held bi-monthly. Financial aid staff meetings are held as needed.

APPOINTMENTS WITH OFFICE STAFF

Students and parents who require general information may see a staff member without an appointment. If a student requests an appointment with a staff member, an appointment is arranged.

IV. RECORDS MANAGEMENT CONFIDENTIALITY OF RECORDS

All records and conversations between an aid applicant, his/her family and the staff of the Financial Aid Office are confidential and entitled to the protection ordinarily given a counseling relationship. FCIM strives to assure the confidentiality of student educational records. As a rule, all currently enrolled and former students have the right to review their records to determine their content and accuracy. A student who wishes to obtain access to his/her financial aid record must schedule an appointment with a financial aid staff member.

AUTHORIZATION TO RELEASE INFORMATION (FERPA)

FCIM complies with the provisions of the 1974 Family Educational Rights and Privacy Act (FERPA). FERPA assures students attending a postsecondary educational institution that they have the right to inspect and review certain educational records and to seek corrections of inaccurate or misleading data through informal or formal procedures. FERPA also protects student FERPA rights by setting strict limits on disclosure of students' educational records without their consent. FCIM has designated the following information as directory information under FERPA and, as such, may be disclosed, without consent, to a third party upon request. FCIM has designated the following information as directory information under FERPA

and, as such, may be disclosed, without consent, to a third party upon request:

- Student's name
- Degrees, honors and awards received
- Major field of study
- Dates of attendance

A student must submit a written release for additional information to be given to any person or agency. Students are notified annually of their rights under FERPA in the Student Handbook and other relevant FCIM publications.

STUDENT CONSUMER INFORMATION

In order to understand the complicated field of financial aid, accurate and timely dissemination of information to consumers is vitally important. Several policies have been implemented to ensure appropriate dissemination is achieved.

Information regarding FCIM Office of financial aid programs and policies is distributed through the following published documents:

- The FCIM Catalog (includes eligibility requirements, application process, academic progress requirements and aid programs available)
- The FCIM Website
- Additional resources are published outside of, but are distributed through the Financial Aid Office. These resources include various tools and guidelines published by the U.S. Department of Education

Other disclosure and reporting requirements are met as follows:

- The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act requires the FCIM Administration to distribute an annual campus security report. These statistics must be published in a report for the previous three calendar years by October 1 of each year and distributed by FCIM email to current students and employees annually. FCIM submits a web- based statistical report to the U.S. Department of Education (USDE) on an annual basis.
- Completion and graduation rates are available in the Registrar's Office. These rates are published in the Student Handbook. These statistics must be published in the USDE'S IPEDs report each year for the period July 1 to June 30 and are disclosed to all enrolled and prospective students.
- A review is done to highlight FCIM's compliance with the drug-free schools and campuses regulations at least once every two years. Information on FCIM's Drug-Free and Alcohol-Free Campus and Workplace Policy is given to all staff and students annually and it is published in the Student Handbook, Administrative Rules and Procedures and other relevant FCIM publications.

- Constitution Day, a federal student aid (FSA) regulation, is held once a year on September 17 or the day before or after depending on what day it falls on if a weekend. A file is kept in the Financial Aid Office, which highlights activities/events that coincide with this celebration.

V. POLICIES AND PRACTICES GOVERNING STUDENT FINANCIAL ASSISTANCE

By signing the Award Letter, the student agrees to comply with the following policies regarding his/her financial aid award at FCIM. Failure to meet the requirements may result in the student's having to repay funds and being denied future financial aid.

1. The Office of Financial Aid reserves the right on behalf of FCIM to review and cancel an award at any time because of changes in financial or academic status, or change of academic program. If an overpayment occurs, the student is responsible for reimbursing the school.
2. Recipients of financial assistance from FCIM ***MUST*** notify the Office of Financial Aid of any grants, scholarships, loans, etc., extended to them from sources outside the school, as these may reduce and or adjusts the financial aid award. Also, any change in name, address or student status must be reported.
3. Most financial aid awards are based on a student's financial need. Information that is reported on the FAFSA is used to calculate an Expected Family Contribution (EFC). Financial aid awards are calculated based on the following equation: Cost of Attendance – EFC – EFA (Estimated financial assistance) = Financial Need. Costs of attendance (COA) figures are available in the financial aid office. EFA can include scholarships or other resources that are also subtracted from the COA to determine need.
4. Financial aid is awarded contingent upon enrollment in an eligible program and maintaining satisfactory academic progress. The school catalog provides information about these policies.
5. It is FCIM's policy to disburse financial aid each term (i.e. each semester). In no instance will a portion of the award be disbursed to the student prior to registration. Refer to the school catalog for registration information.
6. Any commitment of federal/state/institutional funds is tentative and contingent upon subsequent Congressional appropriation and actual receipt of the funds by FCIM.
7. New applications for financial aid are required and should be submitted as soon after January 1st as possible for the following school year. Students are responsible for securing and completing the necessary applications online.
8. Concurrent Enrollment: Students enrolled in courses at other colleges while also enrolled at FCIM, must inform the Financial Aid Office. Students may receive financial aid at only one school in a given term.

9. Federal Pell Grant: As FCIM requires every student to have at least 60 credit hours prior to his/her admission to FCIM, it does not enroll “first-time, full-time students” for undergraduate degrees and therefore does not participate in Federal Pell Grants.
10. Federal Work Study (FWS): FCIM does not participate in the Federal Work Study program.
11. Federal Direct Student Loans: Federal Direct Student Loan eligibility is determined by the FAFSA. All students are awarded the maximum that they are eligible for in the current academic year and are instructed to accept or decline their awards. After a student is awarded and accepts his/her awards, the student loan is disbursed directly to the student’s account each term (after the drop and add date). Students’ tuition and fees are charged to their student account and any excess funds are issued to the student. The student will be notified via email within days of each loan disbursement, of the dollar amount disbursed and of their right to cancel. If an overpayment occurs, the student is responsible for reimbursing the school.
12. Federal Direct Graduate (PLUS) Loans: Plus Loan eligibility is determined by the FAFSA. Graduate students are eligible to apply. After a student is awarded and accepts his/her awards, the PLUS loan is disbursed directly to the student’s account each term. Tuition and fees are charged to the student’s account and any excess funds are issued to the student. If a Graduate Plus loan request is declined for credit reasons, the student may request an endorser to apply for the loan on the student’s behalf.
13. Federal Direct Parent (PLUS) Loans: Plus Loan eligibility is determined by the FAFSA. Parents of dependent students are eligible to apply. Applications are available in the Office of Financial Aid. After a student is awarded and accepts his/her awards, the parent loan is disbursed directly to the student’s account each term. Tuition and fees are charged to the student’s account and any excess funds are issued to the student. The parent will be notified in writing within 30 days of each net loan disbursement and of their right to cancel. If a Parent Plus loan request is declined for credit reasons, the student will be awarded an additional \$4,000 or \$5000 per academic year in unsubsidized funds.
14. Federal Perkins Loans: As FCIM requires every student to have at least 60 credit hours prior to his/her admission to FCIM, it does not enroll “first-time, full-time students” for undergraduate degrees and therefore does not participate in Federal Perkins Loans.
15. Private Loans: As federal student loans tend to have better terms and conditions as compared to private educational loans, FCIM strongly encourages each student borrower to utilize federal student loans prior to seeking funding through private lenders. FCIM does not provide any information regarding any private educational loans to any enrolled or prospective student and does not recommend, endorse or otherwise have any relationship with any private education lender.
16. Federal Financial Aid Return of Title IV Funds Policy: If a student receives Title IV aid and withdraws prior to the 60% point of the term, repayment of a portion of those funds is required.

VI. PARTICIPATION IN FINANCIAL AID PROGRAMS

As a private institution, FCIM has been authorized by the United States Secretary of Education to participate in financial aid programs authorized by Title IV of the Higher Education Act of 1965 as amended.

The programs listed below are those in which FCIM bears some responsibility in administering. Descriptions and eligibility requirements of each program are found in the federal publication for federally funded programs.

The Program Participation Agreement between FCIM and the USDE entitles the Financial Aid Office to participate in the following federal programs:

- Federal Direct Loan Program
- Federal Direct PLUS Loan Program

FCIM also participates in the following Florida state-funded programs (available to residents of Florida only):

- Florida Scholarship Programs
- Florida Prepaid College Plans

Current federal, state and institutional regulations, policies and guidelines are followed in awarding and disbursing aid from all financial aid programs in which we participate.

VII. PROCESSING STUDENT AID REPORTS

The Financial Aid Office participates in the Electronic Data Exchange (EDE) with the USDE. Student information from the FAFSA and the processed results, the Institutional Student Information Record (ISIR) containing the official EFC are imported on a daily basis.

Correction of a data element requested by students or required as a result of verification or other review, is processed and submitted electronically to the USDE/CPS. Within approximately 72 hours, a new official EFC is delivered back to the Office of Financial Aid. Processing of the ISIR is continued and an award, if eligible, is made.

VIII. STUDENT BUDGETS AND COST OF ATTENDANCE

STUDENT BUDGETS

Student budgets are an integral component in the financial aid equation. Standard student budgets reflecting the average student population cost of attendance at a modest, but adequate standard of living are used to award financial aid.

The Director of Financial Aid collects information to prepare standard costs on an annual basis. All costs are based on limitations to the amounts and other criteria set forth in the federal regulations.

DIRECT COSTS

Tuition costs are determined by FCIM and approved by the FCIM Supervisory Board. An average of tuition cost for students is used to determine the exact tuition cost for the standard budget. Fee costs are determined by the institution, based on program-specific needs.

INDIRECT COSTS

Indirect costs consist of the following types of expenses incurred by students: books, supplies, room and board, transportation and miscellaneous items. Room and board expenses are divided into 4 categories: living with parents, living on-campus, living off-campus and independent student. Miscellaneous items include personal expenses for clothing, toiletries, medical/dental, recreational, and other miscellaneous expenses.

Upon request, aid officers may review, and if appropriate, adjust a student's budget. Students should submit an Unusual Circumstance Appeal form attaching appropriate documentation.

Examples of changes to standard budgets include, but are not limited to:

1. Childcare – the cost of child care for students with dependent children may be added to a standard budget.
2. Excessive medical expenses that are not covered by insurance or any other source.
3. Out-of-pocket tuition expense at private elementary or secondary schools for children.
4. Special program costs – some of FCIM's programs of study (e.g. global experience) require additional expenses that are above the average cost included.

IX. VERIFICATION

Verification is the process of confirming the accuracy of student reported data on financial aid applications. Typically, the USDE selection criteria translate into verifying 30 percent of the financial aid population. The school has the authority – and may be required – to verify additional students. Students may be selected for verification if there is a discrepancy or a condition which is unusual and warrants investigation.

The Application and Verification Guide published by the USDE is used as a reference for verification requirements.

FCIM only initially verifies students in which the USDE selected for verification. However, students may be asked to provide additional information if further investigation is needed to resolve a discrepancy.

Upon receipt of the electronic Institutional Student Information Record (ISIR), a Document Tracking Letter is automatically generated for any student who is selected for verification according to the federal selection criteria. This letter informs the student of additional information which is required to complete the financial aid application (verification form, student and parent tax returns, etc.).

Students are notified that until the missing items are submitted to the Financial Aid Office, additional processing of their file is put on hold.

Required documentation items are identified and receipt date is maintained on the financial aid software. Once the items are received, the file is routed to the Financial Aid Representative or Director for verification.

Documentation submitted to the Financial Aid Office must be legible, appropriate, and have the student's ID number for identification purposes. If the student submits a document that is not legible, the document will be returned and appropriate documentation will be requested.

Students who fail to submit verification documents will not be awarded financial aid.

Students are notified that they are selected for verification on the SAR. The document-tracking letter also indicates to the student that he/she has been selected for verification. When the corrected ISIR is received, final review of the file takes place and an award is made, if applicable.

Because the Financial Aid Office is liable for disbursements made prior to verification, it is the policy of the office not to award nor disburse funds until verification is complete. FCIM's policy does not allow interim disbursements. Students must complete the verification process before aid is awarded or disbursed.

Financial Aid Office policies and procedures are designed to eliminate the possibility of an overpayment from any fund. If, however, an overpayment does occur, a stop order is placed on the student's records by the Financial Aid Office and a letter is sent to the student. Students are not allowed to register for subsequent terms and academic transcripts are withheld until the account has been cleared.

X. AWARDING FINANCIAL AID

The Financial Aid Office has developed an institutional packaging philosophy to ensure consistent, equitable and fair distribution of financial aid funds. FCIM's policy is to provide the financial aid needed to each applicant to ensure that a degree or program will be completed; to minimize the adverse effects of financial concerns on academic performance; to provide the most advantageous combination of aid funds for which the student qualifies (subject to the availability of funds); and to make maximum use of all financial aid funds available to the institution.

FCIM ACADEMIC YEAR DEFINITION

FCIM's academic year runs from July 1 of each year to June 30 of the following year. There are two (2) semesters per academic year. The Fall semester starts in July and lasts approximately 24 weeks; while Spring semester starts in January and lasts approximately 22 weeks.

RESOLVING CONFLICTING INFORMATION

FCIM financial aid officers are responsible for resolving any discrepancies between a student's FAFSA and other information of which the school becomes aware. If information is received

from any source that conflicts with the information provided on the FAFSA, it must be verified and updated if necessary. If for any reason an income or tax document is submitted, PTI will review the information for possible conflicts with the applicant's FAFSA responses.

DETERMINATION OF TOTAL FUNDS TO BE AWARDED

The Director determines the total aid funds to be awarded during an award year. The USDE sends the Financial Aid Office information detailing annual fund allocations for Campus-Based Funds through the Federal Authorization Letter with the Official Notice of Funding. Federal Loan Limits are determined by USDE and the school is notified annually.

OUTSIDE RESOURCES

Besides applying for federal student aid, students are free to seek assistance from outside resources on their own initiative. It is required that all outside assistance be reported to the Financial Aid Office. Student aid including outside resources, may not exceed the student's cost of attendance. Therefore, if a student has been awarded funds by the aid office and receives an internal or outside award later, an adjustment to the original award letter may be necessary.

AWARD LETTER AND ACCEPTANCE OF AWARDS

Students receive notice of financial aid via an award letter. Students sign and return their award letter to FCIM, accepting or declining each award.

OVER-AWARDS

If a potential or actual over-award is discovered, USDE guidelines regarding over-awards will be followed.

XI. REVISION OF FINANCIAL AID AWARDS

Once an award letter is sent to the student, there may be instances that warrant a change to the original notification. An aid administrator may review a student's circumstances, make an adjustment to an award and release a revised award letter. This revised award invalidates the original award notice. Enclosures with the award letter acknowledge the right of the Financial Aid Office to make a change to any award.

REVISION INITIATED BY THE FINANCIAL AID OFFICE

The Financial Aid Office will automatically consider a revision in a student's aid package when the following occurs:

- There is a presence of conflicting information within the file.
- There is a change in availability of funds.
- There is a Financial Aid Office error.

Students are sent a revised award letter as soon as possible with highlighting the change. In the

case of an office error, it is customary to contact the student personally, or send a personalized letter.

REVISIONS INITIATED BY REQUEST FROM STUDENT

It is the student's responsibility to notify the Financial Aid Office of changes in a student's resources and/or circumstances. The student may notify the Financial Aid Office of such an instance that affects the student's family contribution by completing an Unusual Circumstances Appeal along with any documentation to validate the change in circumstances. If a change to the award is allowed, the aid administrator will release a revised award letter.

XII. OVER-AWARDS

An over-award occurs any time a student's financial aid (federal, institutional, state and outside aid) and other resources exceed the demonstrated financial need for the award period or exceed the annual or aggregate limits set forth by the USDE.

ELIMINATING AN OVER-AWARD

Before reducing a student's aid package because of an over-award, an attempt should always be made to reduce or eliminate the over-award. Two methods are:

1. Increase cost of attendance budget using allowable expenses.
2. Adjust undisbursed funds.

CAUSES OF AN OVER-AWARD AND/OR OVER-PAYMENT

Causes of an over-award/over-payment may include (but are not limited to):

1. Change in the enrollment status.
2. Additional resources – the student has resources greater than those originally used to calculate the award.
3. Administrative error – the aid administrator inadvertently makes an error.
4. Fraud – the student intentionally deceives or misrepresents information to obtain funds.

TREATMENT OF AN OVER-AWARD

If eliminating the over-award is not possible, the aid administrator must reduce the over-award using the following sequence:

1. An over-award from administrative error must first reduce or eliminate next term's overpayment and then bill the student for any remaining amount.
2. If an over-award occurs due to fraud, follow the procedures outlined by the USDE.

OVER-PAYMENT

Over-payments occur when a student receives aid that exceeded his/her eligibility. This can result from misreporting information on the FAFSA, cost of attendance miscalculations, paying ineligible students, disbursing aid in excess of maximum limits.

The aid administrator must reduce the over-payment using the following sequence:

1. An over-payment from administrative error must first reduce or eliminate next term's overpayment. Then bill the student for any remaining amount.
2. If an over-payment occurs due to fraud, follow the procedures outlined by the USDE.

XIII. FEDERAL LOAN COUNSELING

Entrance loan counseling is completed by the student who is borrowing federal direct loans. The entrance loan counseling is completed online via the federal website of: www.studentloans.gov. In the event the student is not able to do so online, a paper version of the entrance counseling can be obtained at the Office of financial aid.

Exit loan counseling is completed by the student who is borrowing federal direct loans. The exit loan counseling is completed online via the federal website of: www.studentloans.gov. In the event the student is not able to do so online, a paper version of the entrance counseling can be obtained at the Office of financial aid. If a student withdraws, he/she will be notified to complete the same procedure. If the student is not available, a letter is sent along with booklet Exit Counseling Guide for Direct Loan borrowers requesting the student to return of the Student Contact Information Sheet and federal loan history printout from NSLDS is also included.

XIV. PROFESSIONAL JUDGMENT

The Higher Education Act of 1992 allows financial aid administrators to make professional judgment decisions when there are special or unusual family or student circumstances that may call for adjustments in determining a student's eligibility for financial aid. Circumstances requiring professional judgment must be analyzed on a case-by-case basis. These circumstances must be documented.

Professional judgment adjustments may increase or decrease a student's EFC or cost of attendance. Specified adjustments may be made to data elements, but not to the formula. Adjustments made will apply to all institutional, state and Title IV aid awarded.

Circumstances that *may* (but not necessarily) warrant a professional judgment review and/or decision include, but are not limited to the following:

- A change in income of the student's family that would affect the family's ability to pay for college expenses. Examples would be loss of employment, loss of untaxed benefits, a separation or death. Documentation required: verification of change.
- Student requests consideration as an independent student. Documentation required: verification of change.
- Excessive medical expenses. Documentation required: Verification of medical expenses paid by family from doctors, hospitals, etc. or copy of tax return verifying itemized deductions, showing medical expenses.

The required documentation listed for each of these circumstances explains what information is

necessary for each situation. The documentation must be complete before approval will be considered. Documentation of professional judgment decisions will be maintained in the student's folder.

Professional judgment situations are unique. Circumstances other than those listed may be considered and will require documentation specific to the situation. The Director of Financial Aid has the final authority to make professional judgment decisions.

XV. REFUNDS & REPAYMENTS

REFUND POLICY

The College uses a fair and equitable refund policy that are divided into two parts, which are “Part A – Institutional Refund Policy” and “Part B – Federal Return of Title IV Funds Policy”, where Part A applies to all students and Part B applies only to students who obtains federal financial aid under Title IV. Each of Part A and Part B is outlined below. The refund policy is applied equitably to students who are terminated, suspended or who withdraw from the program. Any request by a student to withdraw from the program must be made in accordance with the procedures outlined in the most current FCIM Student Handbook.

Part A – Institutional Refund Policy

1. Refunds are made within 30 days following cancellation, termination, suspension or withdrawal, as applicable.
2. Should the College cancel the program, any tuition and fees paid shall be fully refunded.
3. If the College does not accept an applicant, then all monies paid by the applicant shall be refunded *except for*:
 - (a) Admission Application Fee (\$50);
 - (b) Transcript Assessment Fee (\$100, *if applicable*); and
 - (c) International Student Processing Fee (\$100, *if applicable*).
4. If an accepted applicant cancels his/her enrollment or otherwise withdraws from the program after signing this Enrollment Agreement, then:
 - (a) all Fees paid to FCIM by such student for the relevant semester shall be refunded *except for*:
 - (1) Admission Application Fee (\$50);
 - (2) Registration Fee (\$100);
 - (3) Technology Fee for the relevant semester (\$100);
 - (4) Transcript Assessment Fee (\$100, *if applicable*); and
 - (5) International Student Processing Fee (\$100, *if applicable*); and
 - (b) with respect to all Tuition paid to FCIM for the relevant semester by such student independently of Title IV financial aid (the “*Self-Paid Tuition Amount*”), such student shall receive:

- (1) if less than 20% of the relevant semester's entire length of time has elapsed prior to the student's withdrawal, a refund equal to the portion of the Self-Paid Tuition Amount that is attributable to the remainder of the relevant semester; or
 - (2) if 20% or more of the relevant semester's entire length of time has elapsed prior to the student's withdrawal, no refund of any portion of the Self-Paid Tuition Amount will be due or payable to the student.
5. All unearned portions of any student's Title IV financial aid funds shall be refunded according to "*Part B - Federal Return of Title IV Funds Policy*" (see below), which refund shall be made directly to the Title IV lender(s) for such student's account.
 6. Unmarked textbooks in new condition will be refunded 100% up to 7 days after date of sale with receipt from the FCIM Bookstore. This does not apply to special order books and books not required by syllabus.
 7. All materials and supplies including CDs and tapes are nonrefundable once issued to the student.

Part B – Federal Return of Title IV Funds Policy

Federal regulations require the College to return to the Title IV lender(s) all unearned portions of Title IV funds. The return of Title IV funds is determined based on a specific, federally mandated formula. The amount of Title IV funds that the student earns is prorated based on the attendance at the College during the payment period. The College monitors attendance and refunds are made based on the percentage of the enrollment period (semester) attended through the last recorded day of actual classroom or clinic attendance, up to 60 percent. After 60 percent attendance of the semester, no refund is due. The return of Title IV refund calculation uses the credit hour program and is based on the semester, or payment period. For example, if a student attended the College for 20% of the payment period, then they have earned 20% of the Title IV funds. The excess funds must be returned by the College and/or the student. Once the student has completed 60% or more of the payment period, they have earned all of the Title IV funds and no refund is necessary. The student is notified in writing of any Title IV refund returned to the lender(s) by the College and the total amount of the loan that is his/her responsibility to repay. Title IV refunds are made within 30 days following termination, suspension or withdrawal. The College's refund will be applied first to the unsubsidized portion of the loan, then to the subsidized portion. A post-withdrawal disbursement may be allowed if the student has withdrawn prior to disbursement of funds. The student must have thoroughly completed the FAFSA so that it can be processed and have signed a promissory note. The student must also fulfill the Exit Interview requirements at that time. The student must be aware that any amounts owed to the College will be taken out of this disbursement. For more details regarding calculating refunds, please see the Director of Financial Aid.

ORDER OF RETURNING FUNDS

Funds will be returned in the following order:

- Unsubsidized Federal Stafford Loans

- Subsidized Federal Stafford Loans
- Federal/Direct Plus Loans

OUTSTANDING STUDENT ACCOUNTS

Students are not allowed to register for further classes if they have an outstanding account. If an exception is made, and the student is eligible to receive assistance from any type of funds, the financial aid funds would be applied through credit to the student’s account (in compliance with federal guidelines regarding this issue, if federal funds are involved). If this does not satisfy the debt, the student would be required to repay the balance immediately or further collection measures would be taken.

XVI. SATISFACTORY ACADEMIC PROGRESS REQUIREMENTS FOR FINANCIAL AID RECIPIENTS

SATISFACTORY ACADEMIC PROGRESS

Federal, state and accrediting bodies mandate that schools monitor a student’s satisfactory progress towards completion of a degree; therefore, academic progress has a direct impact on student enrollment status. To make satisfactory progress in a course of study toward a degree, a student must maintain attendance, earn specified grades in each course, maintain a specified overall grade point average, complete a specified number of clinic hours and proceed through the Program at a pace leading to completion in a specified time frame. In order to maintain satisfactory academic progress students must do all of the following:

- Maintain 75% attendance in all academic courses.
- Maintain 100% performance in clinic internship responsibilities.
- Maintain a cumulative grade of 70% (“C”) or higher in all courses.
- Maintain an overall 2.0 grade point average.
- Proceed through the Program within the specified time frame – 3 years, as shown in the table title “Program Progression Policy” below.
- Adhere to all policies, procedures and requirements set forth in the FCIM Catalog, the FCIM Student Handbook and FCIM Clinic Handbook.

Student progress is assessed at the end of each semester. The percentage of didactic and clinical hours completed by each student according to the Program Progression Policy determines a student’s eligibility for continuation in the Program and eligibility for financial aid.

PROGRAM PROGRESSION POLICY

Semester	End of Year	% Program Completion	Equivalent Program Hours
1		14.27%	432
2	1	30.38%	920
3		48.75%	1476
4	2	65.92%	1996
5		82.56%	2500

6	3	100.00%	3028
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The maximum time frame in which a student must complete his or her degree cannot be longer than 150% of the published length of the student’s major. All semesters and credit hours attempted are used toward the maximum time frame allowance regardless of whether the student received financial aid during the time frame. All repeated courses, failed courses, withdrawals, and transferred hours will count as credit hours attempted toward the maximum time frame.

Example: Sally’s major requires 100 hours for graduation, Sally could attempt up to 150 (100 x 150%). Once 150 hours are exceeded, aid would be suspended.

ACADEMIC/FINANCIAL AID WARNING

If the student fails to achieve these minimum levels of performance, he or she will be placed on “Academic/Financial Aid Warning” (or “AFAW”) for one semester, while on AFAW, the student must:

- Make up any deficient clinic hours and satisfy all requirements as set out in the *FCIM Clinic Handbook*; **and either:**
 - Repeat the failed courses with a lower class while proceeding to the next semester on Academic/Financial Aid Warning, further postponing any courses for which the failed course was a prerequisite; **or**
 - Repeat the entire semester with the lower class. This option will impact your satisfactory academic progress as shown above in the table Program Progression Policy and may impact your eligibility for Title IV financial aid.

While on AFAW, a student must, in addition to the above requirements, achieve a minimum of 70% on all test grades and a "Pass" grade on other courses and on all internship evaluations. If the student is a Title IV aid or Veteran Affairs benefits recipient, he/she will continue to receive such aid. A student placed on AFAW must also attend regularly scheduled meetings with the Academic Dean, Director of Financial Aid and/or other designated Administration members to help keep track of his/her progress.

Receiving a grade of “I” (incomplete) or “W” (withdraw) does not mean a student will be placed on AFAW or AFAP. A grade of “I” is temporary and will change to a letter grade upon completion of specified requirements. The grade of “W” may impact progress, if the course is a prerequisite for other courses in the Program, thus delaying progression. A grade of “F” *will* result in AFAW or AFAP.

ACADEMIC/FINANCIAL AID PROBATION

If a student fails to achieve satisfactory academic progress for a second consecutive semester, he/she will be placed on “Academic/Financial Aid Probation” (or “AFAP”) and be provided with an "Academic Plan" that specifies the required coursework necessary to comply with the Program Progression Policy and regular scheduled meetings with the Academic Dean to monitor

progress. If the student is a Title IV aid or Veteran Affairs benefits recipient, any federal funds forthcoming WILL BE CANCELLED. While on AFAP, the student must:

- Adhere to all requirements of the Academic Plan; **and**
- Make up any deficient clinic hours and satisfy all requirements as set out in the FCIM Clinic Handbook; **and either:**
 - Repeat the failed courses with a lower class while proceeding to the next semester on Academic/Financial Aid Probation, further postponing any courses for which the failed course was a prerequisite; **or**
 - Repeat the entire semester with the lower class. This option will impact your satisfactory academic progress as shown above in the table Program Progression Policy and your eligibility for Title IV financial aid.

Students who are placed on Academic/Financial Aid Probation and choose to withdraw from the Program and then re-enroll will remain on the AFAP status until satisfactory academic progress has been met.

APPEALS AND REINSTATEMENT OF AID

If you have been placed on probation and/or disqualified from financial aid, and believe you have extenuating medical or immediate family related circumstances preventing you from complying with either the quantitative (Program Progression time) and/or qualitative (Grades) requirements of Satisfactory Progress, you may submit an appeal in writing within two weeks of your receipt of Probation/ Disqualification notice, with supporting documents if any, to the Director of Financial Aid who will then review the appeal with the Academic Dean & Academic Review Committee. A decision as to whether or not to reinstate aid and/or enrollment and the terms of said reinstatement will be rendered and delivered to the student within two weeks of receipt of the student's appeal. The unanimous decision of the Director of Financial Aid and the Academic Review Committee is final and may not be appealed further.

XVII. AUDITS AND PROGRAM REVIEWS

Federal regulations require a FSA compliance audit every fiscal year. Each audit must cover the time period since the last audit. FCIM's fiscal year ends June 30, and is audited annually by a private auditor. Auditors review all aspects of the college's compliance with federal regulations. This includes financial reports and all other reporting pertaining to the federal student aid. The audit is based on the Guide for Audits of Proprietary Schools. Preparation for the audit is done in cooperation with the auditor's requests. Typically, the auditors will randomly select a specific number of students from each of the Title IV programs. The school is notified the day of the audit which student files are to be examined. Any additional assistance requested is responded to promptly.

The auditor then submits an Independent Auditor's Report including any findings to FCIM and

the FCIM Supervisory Board. An electronic version of the audit is sent to FCIM from the auditors and the Financial Aid Director uploads it to eZ-Audit. A complete listing of financial aid audit guidelines is listed in the Audit Guide published by the USDE.

XVIII. FRAUD

There are difficult situations where students and/or parents purposefully misrepresent information in hopes of obtaining aid or obtaining additional assistance. The Financial Aid Office is required to have a policy of referral when confronted with actual or suspected cases of fraud and abuse.

POLICY FOR FRAUD

Students and parents who willfully submit fraudulent information will be investigated to the furthest extent possible. All cases of fraud and abuse will be reported to the proper authorities.

PROCEDURES FOR FRAUD

If in an aid administrator's judgment, there has been intentional misrepresentation, false statements, or alteration of documents which have resulted or could result in the awarding or disbursement of funds for which the student is not eligible, the case shall be referred to the Director for possible disciplinary action. After investigating the situation, if the Director believes there is a fraudulent situation, all information must be forwarded to the Office of Inspector General of the USDE or the local law enforcement agency.

The Director of Financial Aid reviews the student's aid file with the appropriate aid administrator and if the decision is made by the Director to pursue the possibility of denying or canceling financial aid, a written request to make an appointment is to be sent to the student. If the student does not make an appointment, the Director may:

- Not process a financial aid application until the situation is resolved satisfactorily.
- Not award financial aid.
- Cancel financial aid.
- Determine that financial aid will not be processed for future years.

All processing of the application or disbursement of funds shall be suspended until the Director has made a determination as to whether the student shall be required to make an appointment. Fraudulent situations should be reported to the hotline of the Department of Education Inspector General at (404) 562-6460 or (800) 647-8733.

XIX. FINANCIAL AID OFFICE CODE OF CONDUCT

The Higher Education Opportunity Act (HEOA) of 2008 requires institutions of higher education to develop and enforce a code of conduct that prohibits conflicts of interest for financial aid personnel. In accordance with this requirement, FCIM has established the following code of conduct. Any questions regarding interpretation of, or definitions used in, this Code of Conduct

should be interpreted based on the HEOA of 2008.

This policy applies to all employees who work in the Financial Aid Office and all other College employees, officers and agents who have responsibilities with respect to education loans.

CONFLICT OF INTEREST

No employee shall have a conflict of interest with respect to any education loan or other student financial aid for which the employee has responsibility. Employees may not process any transaction related to their own personal financial aid eligibility or that of a relative.

BAN ON REVENUE SHARING ARRANGEMENTS

FCIM has not, and will not in the future, enter into any revenue-sharing arrangements with any lender.

GIFT BAN

Employees or their family members may not solicit and/or accept any gifts from lenders, guarantors, or servicers of education loans. A gift to a family member of an employee or to another individual based on that individual's relationship with an employee shall be considered a gift to the employee if the gift is given with the knowledge and consent of the employee, and the employee has reason to believe the gift was given because of the employee's position at the College. The College will not accept any marketing gifts from lenders but may accept and distribute educational materials regarding banking services (excluding student loans).

PROHIBITION ON CONTRACTING

Employees who work in the Financial Aid Office or who have responsibilities related to education loans may not accept from any lender or lender affiliate any fees, payments, or other financial benefit as compensation (including the opportunity to purchase stock) for any type of consulting arrangement or other contract to provide services to a lender relating to education loans.

PROHIBITION ON OFFERS OF FUNDS FOR PRIVATE LOANS

FCIM does not request or accept from any lender an offer of funds to be used for private education loans in exchange for promises to the lender with regards to the number of loans made, specific loan volume or preferred lender arrangement.

CO-BRANDING

The College will not permit a private educational lender to use the College's name, emblem, logo or any other words, pictures or symbols associated with the College to imply endorsement of private education loans by that lender.

BAN ON STAFFING ASSISTANCE

The College will not request or accept from any lender any assistance with call center staffing or financial aid office staffing. However, nothing in this section prevents the College from accepting assistance from a lender or guarantor in regards to: professional development training for College staff, providing educational counseling materials, financial literacy materials or debt management materials to borrowers.

ADVISORY BOARD COMPENSATION

No employee who serves on an advisory board, commission or group established by a lender, guarantor, or group of lenders or guarantors may receive anything of value from the lender, guarantor, or group of lenders or guarantors in return for that service.

REIMBURSEMENT OF EXPENSES

Expenses incurred while attending professional association meetings, conferences, or in connection with service on an advisory board or commission must be paid by the College. Payment for entertainment expenses may also not be accepted from any lender, guarantor or servicer. Meals offered as part of meetings, conferences, professional development activities or other events may be accepted if all participants in the meeting or event are offered the meals, or if the meals are included as part of the registration fee.