



WESTCLIFF
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WESTCLIFF UNIVERSITY POLICIES AND PROCEDURES

2024-2025 FINANCIAL AID DEPARTMENT

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INTRODUCTION

The Policy and Procedures Manual defines general institutional policies as they relate to basic statutory and regulatory provisions of federal, state, and institutional programs of financial aid. This manual provides a description of standard operating duties of university personnel as they relate to the requesting, receiving, disbursing, accounting for, and reporting upon the utilization of student financial aid funds. This manual, when used in conjunction with the other manuals and references, is intended to be an operational guide to the Financial Aid Department staff in the daily administration and management of the office. If no policy or procedure addresses a given issue, the Financial Aid Department staff is expected to use professional judgment based upon the intent of all financial aid programs, the Federal Student Aid Handbook and office practices.

- Federal Register
- FSA Partner Connect
- Department of Education – Financial Student Aid Handbook
- Department of Education, Audit Guide
- Dear Colleague Letters and other financial aid legislation and other laws or regulation that impact student aid

INSTITUTIONAL POLICIES AND RESPONSIBILITIES

Westcliff University shall comply with all federal regulations which, when practiced in their entirety, constitute a viable management structure for student financial aid programs.

The Financial Aid Department was created to coordinate all student federal and state financial aid programs at Westcliff University and to execute the student financial aid application and subsequent awards.

Below is a list of applicable policies to be incorporated within the daily operational flow of the Financial Aid Department.

- In accordance with established procedures, all students applying for financial aid assistance must submit the appropriate forms to the Financial Aid Department and complete any other processes deemed necessary financial aid payments until all necessary documents and applications are on file with the Financial Aid Department at Westcliff University.
- All Federal Work Study Programs will be administered through the Financial Aid Department.

- Students applying for financial assistance are considered for all programs, for which they are deemed eligible, contingent upon availability of funds. The student’s resulting “financial aid package”, may consist of one or more programs that in the opinion of the Financial Aid Department best suits the student’s needs.

FINANCIAL AID PHILOSOPHY

At Westcliff University, we are committed to providing equitable access to quality education by minimizing financial barriers for students. Our financial aid programs aim to:

- Promote academic success by supporting students in meeting their educational goals.
- Ensure fairness and consistency in awarding aid, in compliance with federal, state, and institutional regulations.
- Prioritize need-based aid while recognizing merit and special circumstances.
- Empower students and families through transparent communication and financial literacy education.

By upholding these principles, we strive to create an inclusive and supportive environment where all students have the opportunity to succeed.

Purpose

The Financial Aid Office at Westcliff University is dedicated to supporting the academic success and financial well-being of students by providing equitable access to financial resources. Our purpose is to:

1. Assist students and families in navigating the financial aid process with transparency, integrity, and professionalism.
2. Administer federal, state, institutional, and external financial aid programs in compliance with all applicable regulations and policies.
3. Promote access to higher education by reducing financial barriers and empowering students to make informed financial decisions.
4. Provide personalized counseling and financial literacy education to support responsible borrowing, budgeting, and financial planning.

Through these efforts, we strive to create an inclusive environment where students can focus on achieving their educational and career goals while fostering a partnership in financial responsibility.

1. The Financial Aid Department will respect the confidentiality of student records and protect the privacy of students and families as set forth in the Family Educational Rights

and Privacy Act (FERPA) of 1974. To protect the privacy of students and families, federal law sets certain conditions on the disclosure of personal information from records kept by schools that participate in the Student Financial Aid Programs.

2. Monitor communication channels so that the students personally relate any financial aid status changes to the Financial Aid Department. Whenever information about a change in student financial aid status is received, the Financial Aid Department must verify continued eligibility on all funds awarded.
3. Work closely with the Admissions Office, Student Services, Student Accounts, faculty and staff as needed.

CODE OF CONDUCT

1. No action will be taken by financial aid staff that is for their personal benefit or could be perceived to be a conflict of interest.

- Employees within the financial aid office will not award aid to themselves or their immediate family members. Staff will reserve this task for an institutionally designated person, to avoid the appearance of a conflict of interest.
- Westcliff University does not create, maintain, or distribute any listing of “preferred” or “recommended” education loan providers, nor will Westcliff University staff endorse any particular third-party private education loan provider or distribute promotional materials on behalf thereof.
- A borrower's choice of a lender will not be denied, impeded, or unnecessarily delayed by the institution, even if that lender is not included on the institution's preferred lender list.
- No amount of cash, gift, or benefit in excess of a de minimis amount shall be accepted by a financial aid staff member from any financial aid applicant (or his/her family), or from any entity doing business with or seeking to do business with the institution (including service on advisory committees or boards beyond reimbursement for reasonable expenses directly associated with such service).

2. Information provided by the financial aid office is accurate, unbiased, and does not reflect preference arising from actual or potential personal gain.

3. Institutional financial aid offers and/or other institutionally provided materials shall include the following:

- Breakdown of estimated individual Cost of Attendance components, including which are direct (billed by the institution) costs vs. indirect (not billed by the institution) costs

- Clear identification and proper grouping of each type of aid offered indicating whether the aid is a grant/scholarship, loan, or work program
- Estimated net price
- Standard terminology and definitions, using NASFAA's [glossary of terms](#)
- Renewal requirements for each aid type being offered as well as next steps and financial aid office contact information

4. Financial aid professionals will disclose to their institution any involvement, interest in, or potential conflict of interest with any entity with which the institution has a business relationship.

FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT (FERPA) OF 1974

The university complies with all applicable laws and regulations relating to student privacy and rights pertaining to education records under the Family Education Rights and Privacy Act (FERPA) of 1974.

The FERPA form is available here: [FERPA FORM](#)

Eligibility

FERPA applies to any schools that receive funding from the Department of Education (DOE). When a student turns **18 years old (majority age) or attends an institution of postsecondary education at any age, they become an “eligible student,”** and all FERPA rights transfer from the parent to the student. For more information about parental rights under FERPA, visit this page on the DOE website. Additionally, Part B of the Individuals with Disabilities Education Act (IDEA) protects that confidentiality of personally identifiable information (PII).

Protected Records

FERPA is administered by the Student Privacy Policy Office (SPPO) in the Department of Education (DOE).

FERPA protects “education records,” which are any records directly associated with the student and maintained by the educational agency or institution, or a party acting on behalf of the school (such as an employee or consultant). FERPA maintains certain exceptions to education records, such as law enforcement records; more information can be found on this page on the DOE website <https://studentprivacy.ed.gov/guidance>

Protections, and Allowances

Eligible students are granted:

(1) ACCESS to Their Education Record

Students have the right to inspect and review their education records, and may do so by making an oral or written request to the school official responsible for the requested record. The official must respond within 45 days of the request by sending the student a copy of the requested record or by arranging an appointment for the student to review it. Students may not have access to the confidential financial statement of parents or any information contained in such statements.

Students may waive their right to access confidential letters of recommendation that they seek for admission to any educational agency or institution for employment, or application for an honor or honorary recognition. Students must be notified of requests of all such individuals furnishing recommendations, and the letters must be solely for the stated purpose for which the student was notified and for which they waived their right of access. Such waivers may not be required as a condition for admission to, receipt of financial aid for, or receipt of any other services or benefits from such an agency or institution. Where any such records, files, or data contain information related to a third-party, the student is entitled to be informed of only the portion of that record as it pertains to them.

Each record-keeping unit of the school will establish procedures for accommodating requests for access to administrative charge not exceeding the actual cost to the school for providing access to a student is entitled to copy privilege regarding their records, files, and data at a reasonable administrative cost.

(2) AMENDMENT of Their Education Records

Eligible students have the right to an explanation of any information contained in their record, and to request amendments or corrections to their education records if they believe them to be inaccurate, misleading, or in violation of their privacy. While a school is not required to grant the request, it is required to consider the request and notify the student of the decision and the student's right to a hearing and—upon denial of the amendment—insertion of a statement in their record regarding the contested information. Eligible students substantive education records, such as academic or disciplinary records and FERPA may not require schools to make these amendments.

(3) DISCLOSURE of Their Education Records

Educational records of the student, or the contents thereof, are not released to the student, their parents, or any third party if the student remains in an unresolved academic issue or disciplinary matter. This limitation does not preclude students from

having personal access to their records, merely from obtaining the release of the information.

Disclosure of Discipline Records to Parents or Guardians of Dependent and Non-Dependent Students

Student disciplinary records are maintained as a part of each student's Educational Records. The school reserves the right to report general discipline information to the parent or legal guardian of a dependent student pursuant to guidelines set forth in this section and in the section above. In addition, federal legislation authorizes the school to disclose records of disciplinary violations concerning violations of state, federal, or local governing the use or possession of alcohol or controlled substances, which involve students who are under the age of 21. Disclosure of these types of disciplinary violations may be made to a parent or guardian regardless of whether the student is a dependent. Accordingly, the school may report general discipline information to parents or legal guardians of dependent students, and disciplinary information concerning alcohol and drug violations to parents or legal guardians of students under 21, regardless of dependency, under any of the circumstances:

1. The parent or legal guardian inquires about a specific university Code of Conduct violation which the student was accused of committing
2. The student exhibits a repeated pattern of misconduct and has exhausted or failed to complete required program or other performance requirements;
3. The Code of Conduct violation constitutes a felony under state or federal law;
4. The student has been involved, or has involved others, in a potentially life-threatening situation;
5. In a professional judgment of the staff of the Office of Judicial Affairs, a report to the parent or guardian of the student is advisable under the specific facts and circumstances of the disciplinary incident in question
6. The school will not provide any information or documentation for any student or graduate who is delinquent in payment of tuition, fees or any other financial obligation incurred through the university. Westcliff University has the right to deny students to sit for final examinations, to have final examinations graded, or to register for the next term.
7. Documents and files (both electronic and hard copy) containing confidential information are to be accessed, used, and disclosed only with explicit authority and only based on need-to-know for the purpose of a job function, contract, volunteer or paid service to the school.
8. Confidential information regarding any individual or entity acquired during the course of employment at, or providing services to, the university must never be divulged to

anyone outside of the university without authorization or to anyone within the university except on a need-to-know basis.

9. Upon conclusion of employment or service, or upon request of a supervisor, all originals and copies of confidential records, whether electronic or hardcopy, must be returned to the school and all further access to and use of such information relinquished.
10. Records must be maintained and disposed of according to the university's policy on Record Retention. The school takes no responsibility for the unauthorized collection, storage or transmittal of third-party information regarding any individual or entity by students, faculty, staff, volunteers or vendors.

Disclosure to Third Parties

Disclosure of information contained in student records, files, and the student normally controls data. Such disclosures will be made to someone other than a university official having a legitimate educational interest in the records only on the condition that prior written consent is obtained from the student. The third party is to be reminded that they should not permit additional access to the information by an additional person without further written consent of the student prior to such an additional transfer of information.

When information on a student must be shared outside the school, all persons, agencies, or organizations desiring access to the records of a student shall be required to sign a written form, to be kept permanently with the file of the student, indicating specifically the legitimate educational or other interests in seeking this information. This form will be available solely to the student and to the university officer responsible for the record as a means of auditing the operation of the record system.

Disclosure to Other Educational Institutions

Disclosure of appropriate academic records may be made to officials of other educational institutions to which the student has applied and where he/she intends to enroll.

Disclosure Pursuant to Judicial Order

Information concerning a student shall be released if properly subpoenaed pursuant to a judicial, legislative, or administrative proceeding. Effort will be made to give advance notice to the student of such an order before compliance by the university.

Disclosure Pursuant to Requests for Financial Aid

Necessary academic and/or financial student records may be disclosed without the student's prior consent in connection with the student's application for, or receipt of, financial aid.

Disclosure to Federal and State Authorities

This policy shall not preclude access to student records by authorized federal and state officials in connection with the audit and evaluation of federally supported education programs or in connection with enforcement of federal and state legal requirements that relate to such programs. Except when collection of personally identifiable data is specifically authorized by federal and state law, any data collected and reported with respect to an individual student shall not include information (including social security number) that would permit the personal identification of such student.

Disclosure Under Emergency Conditions

On an emergency basis, a designated school officer may release information about a student when that information is necessary to protect the health or safety of a student.

Disclosure to Educational Agencies and Institutions

Information that will not permit the individual identification of students may be released to organizations of educational agencies or institutions for the purpose of developing, validating, and administering predictive tests and measurements. Similarly, information may be released to accrediting organizations in order to carry out their accrediting functions.

Disclosure to Parents of Dependent Students

Information concerning a student who is dependent within the meaning of Section 152 of the Internal Revenue Code of 1954 may be released to that student's parents. The Internal Revenue Code defines a dependent student as one who has attended an educational institution full-time for any five calendar months of a tax year and who was provided more than one-half of his/her support as claimed by the parent or parents on their income tax statement. For purposes of this policy, the assumption, unless individually certified to the contrary under the above criteria, will be that university students are not dependents within the meaning of the Internal Revenue Code.

Exceptions to Prior Written Consent: Disclosure Without Consent

1. "School officials" of postsecondary institutions may access PII if they have a legitimate educational interest in the information. Additionally, the school's annual notification of rights under FERPA must include the criteria for "school officials" and "legitimate educational interests." The "school official" exception under FERPA also includes contractors, consultants, volunteers, or other third-party services outsourced by the school, provided that they:
 - a. Perform a function or service for which the school would otherwise use employees;
 - b. Are under the direct control of the school regarding use and maintenance of education records;
 - c. Are subject to FERPA requirements for the use and redisclosure of PII; and

- d. Meet the school’s definitions for “school official” with “legitimate educational interest” that goes out in the annual report on FERPA rights.

2. FERPA permits the disclosure of PII to another school where a student “seeks or intends to enroll,” or where they are already enrolled—as long as the information is related to their enrollment or transfer. Disclosure without consent is permitted as long as reasonable attempts were made to notify the students, or if the annual notice of students rights related to FERPA contains a statement explaining that the school forwards PII related to enrollment or transfer to schools that request it. The disclosed records must be provided to the eligible students if requested and, if requested, the student must be provided a hearing and an opportunity to request amendment to the education records.

3. FERPA also permits the disclosure of PII without consent when it has been appropriately identified as “directory information,” which is information generally not considered harmful to students if disclosed. Westcliff University may disclose directory information for any purpose at its discretion without the consent of the student. However, students 18 years of age and older, or the parents or guardians of dependent students, may request that the university not release their directory information. Westcliff University considers the following information is considered directory information:

- A. Name
- B. Major/Field of Study
- C. *Part-time/Full-time Enrollment Status*
- D. *Dates of Attendance (including matriculation and/or withdrawal dates)*
- E. *Academic Classification (by year)*
- F. *Degrees and Awards*
- G. *The most recent previous educational agency or institution attended*
- H. *Photograph*

Violations of this policy are treated seriously. Employees’ failure to comply with this policy may lead to discipline, up to and including termination. Student workers employed by the university who violate this policy may be terminated from their jobs and may also face discipline under the Student Code of Conduct. Others covered by this policy may lose opportunity to contract with, volunteer for, or otherwise provide service to the university. Violations might also subject the violator to criminal or civil prosecution under federal or state laws.

For more information about the rights, protections, and allowances regarding student records, please reference the United States Department of Education (DOE)’s [An Eligible Student Guide to FERPA.pdf - Google Drive](#)

Buckley Amendment

A student's academic records, grades, and personal information, as in compliance with the Buckley Amendment (Public Law 93-380, Section 438) may not be provided to third parties without his/her written consent. Permission must be given by the student in order for the information in his/her file to be used as reference checks for credit or employment evaluation by third parties, and the student must file with the University Registrar a declaration to this effect that will be kept in the student's file. The provision to release financial data or related information to authorized state and/or federal agencies is not a violation of the Buckley Amendment.

Disclosure of Student Records

FERPA requires that a student's education records be:

1. Disclosed *only* to persons who meet the strict definition of a school official who has a legitimate educational interest in the records (or others explicitly granted access under the law). Contact the Registrar's Office for a complete listing of these individuals.
2. Made available within 45 days of the student's written request for inspection and review.

A school official is defined as:

1. A person employed by the University in an administrative, supervisory, academic, research, or support staff position.
2. A student, alumnus, or other person who is serving on an official committee (e.g., disciplinary, grievance) or is assisting a school official in a task.
3. A trustee or outside contractor (e.g., health or medical professional, attorney, auditor) acting as an agent for the University.

A University official has a legal right to know if a person defined as having a legitimate educational interest is:

1. Performing a task that is specified in his/her position or related to student discipline.
2. Providing a service or benefit related to a student/a student's family, or maintaining safety and security on campus.

An example of legitimate educational interest would be an advisor who needs to review a student's education record to determine what courses have been or need to be completed; this task is related to student advising. The advisor would not be authorized to view education records that are not relevant to the task at hand. *Curiosity does not qualify as a legal right to know.*

Those who receive student record information may use it only for the purpose specified. If a third party discloses personally-identifiable student information in violation of FERPA, the educational agency or institution which disclosed the information to the third party is prohibited from permitting access to education records to that third party for a period of not less than five years.

Parents have the right to expect confidentiality of certain types of information about them in student records and, under certain conditions, to gain access to information in student education records. For purposes of FERPA, the University considers all students to be independent; this limits the student education record information that may be released to parents (without the student's specific written permission) to Directory Information only.

Directory Information

The University complies with all applicable laws relating to personal privacy, including the Family Education Rights and Privacy Act (FERPA) of 1974. The University has designated certain information contained in the education records of its student as directory information for purposes of the Family Educational Rights and Privacy Act (FERPA).

The following information regarding students is considered directory information:

1. Name
2. Major Field of Study
3. Part-time/Full-time Enrollment Status
4. Dates of Attendance (including matriculation and withdrawal dates).
5. Academic Classification by Year
6. Degrees and Awards Received
7. The Most Recent Previous Educational Agency or Institution Attended by the Student
8. Student's Photograph

This institution may disclose directory information for any purpose in its discretion, without the consent of a student. Students have a right, however, to refuse to permit the designation of any or all of the above information as directory information. In that case, this information will not be disclosed except with the consent of a student, or as otherwise allowed by FERPA.

Westcliff University Financial Aid personnel will undergo initial FERPA training upon hire, and undergo annual FERPA from a source to be determined.

GENERAL REQUIREMENTS FOR STUDENT ELIGIBILITY FOR FINANCIAL AID

Students applying for federal and state financial aid and work study programs must:

- Must have a financial need
- Be a citizen or an eligible non-citizen
- Be enrolled in an eligible program of study
- Not be in default on any National Direct Student Loan, Guarantee Student Loan or owe a refund on any Title IV Grants at any institutions previously attended

Basic Information

It is the student's personal responsibility to obtain all of the information necessary for financial assistance. Students must submit the *Free Application for Federal Student Aid (FAFSA)* to the U.S. Department of Education's FAFSA Processing System (FPS), if you want to be considered for federal and state financial aid. The FAFSA is available in paper and electronic formats. You can get the paper version by calling 1-800-4-FED-AID. We encourage students to fill out a web-based version of the FAFSA at www.studentaid.gov. An FSA ID is required to complete the FAFSA application. The FSA ID is the student's username and password to the FAFSA and other Federal Student Aid websites. Students can go to studentaid.gov

After the application is completed, it is sent to the Department of Education FAFSA Processor. The data input will then be sent to the FAFSA Processing System (FPS) to calculate the Student Aid Index and match the student's data against a number of databases, such as the Social Security Administration's citizenship database, Veterans Affairs, etc. After all processing is complete, you will receive your FAFSA Submission Summary (FSS) in about 4-6 weeks after submitting a paper application, 1-5 days after submitting a web based application and the University will receive an Institutional Student Information Record (ISIR) in the same time period. Westcliff University will review the ISIR or FSS produced to determine student's eligibility.

Student Rights and Responsibility

Students have the right to know:

- What financial aid is available and how to apply for it;
- How the institute selects students to receive financial aid;
- How does financial aid determine the offer;
- How were changes to offer made;

- What accreditations does the institute have;
- What programs are offered, what facilities it has, who is on the faculty and staff;
- What is the cost of attendance;
- What it takes to make satisfactory progress and be in good academic standing;
- That information regarding student information is handled with the highest degree of confidentiality;
- How to receive counseling about financial aid.

AVAILABLE STUDENT FINANCIAL AID

The college complies with the regulations pertinent to each of the financial aid programs for which it has been approved. The following is a description of the financial aid programs available at Westcliff University. Additional information can be obtained through the Financial Aid Department.

Federal Pell Grant

<https://studentaid.gov/understand-aid/types/grants/pell>

The Federal Pell Grant program provides a foundation of assistance to which other forms of aid may be added. Eligibility of the Federal Pell Grant program is determined by a standard formula that is revised and approved every year by the federal government. Unlike loans, grants do not have to be paid back. Congress sets the amount of Federal Pell Grants each year and is available for all eligible students. Students who transfer to Westcliff University during the academic year will have their eligibility determined on an individual basis. Students may not receive Federal Pell Grant funds from more than one school at a time. If a payment period crosses over two award years, Pell Grant funds will be paid from the award year in which the payment period begins.

Pell Lifetime Eligibility Limit: Effective beginning with the 2012-2013 award year, the duration of a student's eligibility to receive a Federal Pell Grant is 600% (6 full academic years). The calculation of the duration of a student's eligibility will include all years of the student's receipt of Federal Pell Grant funding. Once a student exhausted the full 600%, the student will no longer qualify for future eligibility in the Pell Grant program. Westcliff uses Pell Grant Formula 1: Term-Based Program using Credit Hours (Standard or Non-Standard Calendar).

Year Round Pell: Effective the 2017-2018 award year, students may be eligible for up to 150% of their annual Pell Grant award. Students must use 100% of their award during the fall and spring semesters to be eligible for and additional Pell Grant disbursement during the summer

semester. Year round Pell Grant disbursements are counted towards a student's Lifetime Eligibility Used (LEU).

The maximum amount students are eligible for the 2024-2025 award year is \$7,395.

1. Calculation Basis:

- Awards are calculated based on:
 - i. The student's SAI (as determined by the FAFSA).
 - ii. The Cost of Attendance (COA) for the academic year.
 - iii. The student's Enrollment Intensity
- Academic Calendar - Semesters
- Award Disbursement
 - i. The annual Pell prorated based on the students Enrollment Intensity.

Crossover Payment Periods

Payment periods that cross two award years, the institution will assign the period to the award year that benefits the student the most, following federal regulations.

Federal Work Study

<https://studentaid.gov/understand-aid/types/work-study>

The Federal Work Study (FWS) Program is a financial aid program funded by the Federal Government and is intended to provide part-time employment opportunities for eligible students who need additional financial resources to pursue a college education. To qualify for this program, students must complete a FAFSA, have need, and be in good academic standing.

Westcliff University qualifies for subsidized payments from the federal government, meaning the federal government will provide 75% of the FWS pay. The federal government will reimburse the university 100% for any student employed in an American Reads position. The department with open positions on campus will conduct the interview and hiring process. Off-campus positions will be posted by the outside employer and they will conduct the interview and hiring process. When hired for the position, Westcliff will keep payroll records of the students' hourly wages and share them with the financial aid department on a monthly basis, with confirmation from the employer. Students must apply and interview for the position, they are not entitled to the position.

FWS has a community service component that must be fulfilled in order to participate in the program. At least one student must be employed in a community service position either on or off-campus. The institution qualifies for subsidized payments from the federal government,

meaning the federal government will reimburse the institution with 75% of the student worker's pay.

Federal Supplemental Educational Opportunity Grant (FSEOG)

<https://studentaid.gov/understand-aid/types/grants/fseog>

The Supplemental Educational Opportunity Grant (SEOG) is one of the Campus Based Programs. Westcliff University determines which students receive this grant based on students with the lowest Student Aid Index (SAI).

Award Amounts

The Financial Aid Office will award a student up to \$200 dollars per academic year, depending on the student's financial need, when he/she applies, the amount of other aid received and the availability of funds at Westcliff University (WU). There is no guarantee every eligible student will be able to receive a FSEOG. FSEOG funds are awarded by academic year.

Westcliff University receives a certain amount of FSEOG funds each year from the U.S. Department of Education's office of Federal Student Aid. Once the full amount of the school's FSEOG funds has been awarded to students, no more FSEOG awards can be made for that year. This system works differently from the Federal Pell Grant Program, which provides funds to every eligible student. Westcliff can offer additional FSEOG if funds remain up to a total of \$550 an award year.

FSEOG awarding is done in two tiers based on the student's SAI:

Tier 1 \$200 FSEOG per academic year: SAI ranging from -1500 SAI up to but including zero (0) SAI

Tier 2 \$100 FSEOG per academic year: SAI of zero (0)

Eligibility Determination

In order to determine if you are eligible, the U.S. Department of Education uses a standard formula to evaluate the information you report when you apply through the Free Application of Federal Student Aid (FAFSA). The formula produces a Student Aid Index (SAI) number. Following Federal Regulations, WU awards FSEOG to students who have demonstrated Pell Grant eligibility for the award year, starting with the lowest SAI (-1500 SAI) up to a SAI of zero (0). Students who have an SAI greater than zero will not be awarded the FSEOG grant for the applicable award year. FSEOG is awarded to eligible students until the WU funding authorization for the award year is exhausted for all campus-based programs.

SEOG awarding is done in two tiers based on the student's SAI:

Tier 1 \$200 FSEOG per academic year: SAI ranging from -1500 SAI up to but including zero (0) SAI

Tier 2 \$100 FSEOG per academic year: SAI of zero (0)

To be considered for FSEOG, you must:

- Fill out a Free Application for Federal Student Aid,
- Meet all Department of Education eligibility requirements including but not limited to:
 - Having financial need,
 - Having a high school diploma or a General Education Development (GED) Certificate,
 - Being a U.S. citizen or eligible non-citizen,
 - Having a valid Social Security Number,
- Be enrolled or accepted for enrollment as a regular student working toward a degree or certificate in an eligible program,
- Meet the standards of the Financial Aid Satisfactory Academic Progress Policy (FA SAP),
- Have a SAI of zero or lower,
- Be an active student

FEDERAL DIRECT LOAN PROGRAM

<https://studentaid.gov/understand-aid/types/loans/subsidized-unsubsidized>

Federal Direct Loan Programs are administered by the Department of Education for qualified students. The Federal Direct Subsidized Stafford, Federal Direct Unsubsidized Stafford, and Federal Direct PLUS (Parent PLUS or Graduate PLUS) loans are available through this program.

Federal Direct Subsidized Stafford Loan

Federal Direct Subsidized Stafford Loans are available to students with financial need. Students may borrow up to \$3,500 for their first academic year at a fixed interest rate (published on studentaid.gov), which is established annually by the Department of Education. The interest is paid by the federal government while students are in college and six months after students cease their enrollment. Regular payments begin six months after students cease enrollment or fail to carry at least half the normal full time college workload..

Maximum eligibility period is based on the published length of the current program a student is enrolled for. As a result, a change in program may affect maximum eligibility. If Direct Subsidized Loans were received for one program and then a program change occurs, the Direct Subsidized Loans received for the earlier program will generally count against the new maximum eligibility period.

Federal Direct Unsubsidized Stafford Loan

Unsubsidized Stafford Loan programs are available for students to borrow for additional education costs. Students can borrow up to \$5,500 for their first academic year as a combined total with the Federal Direct Subsidized Stafford Loan, at a fixed interest rate (published on studentaid.gov). With the exception of demonstrating financial need, borrowers must meet all eligibility criteria of the regular Direct Federal Stafford Loan program. Interest payments begin immediately after the loan is fully disbursed or may be added to the principal balance. Regular payments begin six months after students cease enrollment or fail to carry at least half the normal, full-time school workload.

Federal Direct PLUS Loans (Parent PLUS or Graduate PLUS)

Federal Direct Parent Loans for Undergraduate Students (PLUS) and Graduate PLUS loans provide additional funds for creditworthy parents and graduate degree students to help pay for educational expenses. The interest rate for these loans is published on studentaid.gov and multiple repayment options are available. The standard repayment schedule begins 60 days after the loan is fully disbursed. Parents have the ability to defer the repayment of the PLUS loan up to six months after the student's last date of attendance, or after they fall below half-time status. The repayment for Graduate PLUS loans borrowers is automatically deferred. Interest will capitalize during the deferment, but borrowers will have the option to make interest payments while the loan is deferred.

APPLICATION PROCEDURE

1. Create an FSA ID at studentaid.gov
2. Complete and submit the Free Application for Federal Student Aid (FAFSA) each award year and wait to receive a FAFSA Submission Summary (FSS).
3. Submit verification documents if selected for verification as indicated on the FSS.
4. Receive the Financial Aid Offer and complete required Westcliff University financial aid forms for student's financial aid package.
5. Complete student loan entrance counseling and master promissory note (if using loans).
6. Submit official highschool to the admissions office.
7. Transfer students must provide an official academic transcript to the Admissions Office.
8. Have an acceptance letter from the Admissions Office.

STUDENT AID INDEX

<https://studentaid.gov/help-center/answers/article/what-is-sai>

All the data used to calculate the Student Aid Index come from the information the student provides on the FAFSA. The FAFSA analyzes the information from the FAFSA and calculates the SAI. The school determines the student's eligibility on the basis of the Student Aid Index. SAI is a number that helps colleges determine how much aid a student may need. The SAI is subtracted from the school's Cost of Attendance (COA), also known as the "student budget". The student budget includes fees, room and board, travel, and personal expenses. The lower the SAI, the greater your chances are of receiving financial aid grants and subsidized loans (for undergraduate students). Westcliff University, along with the Department of Education, determine the amount of the student's PELL Grant award on the basis of SAI, CoA, enrollment status, length of enrollment, and defined academic year.

COST OF ATTENDANCE (COA)

<https://studentaid.gov/help-center/answers/article/what-does-cost-of-attendance-mean>

Westcliff University has adopted the Cost of Attendance (COA) methodology provided by the California Student Aid Commission (CSAC). The CSAC COA is designed to reflect reasonable and necessary expenses students are likely to incur while pursuing their education. This approach ensures consistency with state guidelines and provides students with a fair assessment of their financial needs.

The COA includes both direct and indirect expenses for an academic year and is established for various student populations, including:

- Undergraduate and graduate students
- On-campus, off-campus, and commuter students
- In-state and out-of-state students

Components of the Cost of Attendance

1. Tuition and Fees
 - Direct charges for enrollment, including mandatory fees as published in the student catalog.

2. Room and Board

- Estimated living expenses for students living on-campus, off-campus, or at home with parents.

3. Books and Supplies

- Estimated Cost for required course materials, textbooks and other supplies.

4. Transportation

- Estimated cost for travel to and from campus for program related activities.

5. Personal Expenses

- Estimated miscellaneous expenses for personal items, healthcare, and other necessary services

6. Loan Fees

- Estimated federal loan origination fees for students who borrow Title IV loans.

The Financial Aid Office Office reviews and updates the COA annually in alignment with CSAC guidelines and institutional data to reflect changes in economic conditions, tuition rates, and relevant factors.

The COA is published on the institutional Financial Aid website and is made available to all students. Students are encouraged to review the COA and contact the Financial Aid Office with any questions or special considerations that may impact their individual COA.

ACADEMIC YEAR DEFINITION

<https://studentaid.gov/help-center/answers/article/academic-year>

An academic year is defined as a minimum of: 24 credit hours and 32 weeks of instruction for undergraduate students, along with 12 credit hours and 32 weeks of instruction for graduate students, for Title IV purposes.

Undergraduate Length	Total Credits	Academic Year
Bachelor of Business Administration	120 credits	32 weeks
16 week semesters with two (2) 8-week sessions 1 academic year = 2 semesters per year = 24 credits 1 calendar year = 3 semesters per year = 36 credits		

Enrollment Status	Credits Required
Full-Time Status	12+ credit hours per semester
3/4 Time Status	9-11 credit hours per semester
1/2 Time Status	6-8 credit hours per semester
Less than 1/2 Time Status	1-5 credit hours per semester

Graduate Length	Total Credits	Academic Year
Master of Business Administration	36 credits	32 weeks
Master of Arts in Teaching English to Speakers of Other Languages	36 credits	32 weeks
16 week semesters with two (2) 8-week sessions 1 academic year = 2 semesters per year = 12 credits 1 calendar year = 3 semesters per year = 18 credits		

Enrollment Status	Credits Required
Full-Time Status	6+ credit hours per semester
3/4 Time Status	4-5 credit hours per semester
1/2 Time Status	3 credit hours per semester
Less than 1/2 Time Status	1-2 credit hours per semester

AWARDING OF FEDERAL AID (TITLE IV)

All Title IV funds are awarded based on the information received from the FAFSA. You must complete the FAFSA to be eligible. The FAFSA can be found at studentaid.gov.

With Westcliff University's open enrollment policy, the university uses the Borrower Based Academic Year. The academic year, for financial aid purposes, begins when the Title IV student first enrolls (for new students) or when the Title IV student requests to apply their financial aid (continuing students). Awards are made on a first-come, first-served basis.

Based on a student's enrollment and housing plans, and estimated Cost of Attendance (COA) will be assigned for packaging purposes.

The SAI is subtracted from the COA to determine each student's demonstrated financial need.

$COA - SAI = NEED$

The sum of all need based awards will not exceed the need of the student. The packaging methodology for undergraduate students:

PELL grant is determined by calculating a student's SAI and subtracting it from the maximum Pell Grant award with the final amount adjusted based on the student's "Enrollment intensity" (percentage of full-time enrollment)

All known institutional and outside scholarships are applied next.

Eligibility for Subsidized and/or Unsubsidized Direct Loans will be calculated and added to the package.

Graduate students are typically only eligible for Unsubsidized Direct Loans and GradPlus Loans. A COA is calculated based on the academic program to establish the amount that can be borrowed. A FAFSA form is still necessary to gather the information required for students to participate in the federal loan programs.

VERIFICATION POLICY

Purpose

To ensure the accuracy of financial aid information, Westcliff University verifies specific data reported on the Free Application for Federal Student Aid (FAFSA®). This process is essential for the correct distribution of Title IV funds to eligible students.

Overview

Verification is the process by which Westcliff University confirms the accuracy of information provided on the FAFSA®. Applications may be selected for verification by the FAFSA Processing System (FPS) or by the institution itself, in accordance with federal regulations.

Notification Process

Students selected for verification will be notified through one or more of the following methods:

- Email

- SMS messaging
- Phone call
- In-person contact

Notifications will include:

1. Specific verification forms required.
2. A list of necessary supporting documents.
3. Instructions for submission and deadlines.

Verification Requirements

1. **Documentation:**

Students may be required to submit:

- Institutional verification forms.
- IRS Tax Return Transcripts or signed copies of tax returns.
- W-2 forms.
- Documentation of untaxed income, such as:
 - Child support received or paid.
 - Untaxed IRA and Keogh plan contributions.
 - Interest on tax-free bonds.
 - Workers' compensation.
 - Cash received or money paid on the student's behalf not reported elsewhere.
- Proof of high school completion status.
- Identity and Statement of Educational Purpose (if required).

2. **Verification Data Elements:**

The following items may be verified:

- Household size.
- Adjusted Gross Income (AGI).

- U.S. income tax paid.
- Income earned from work.
- Untaxed income and benefits.

3. Correction and Resolution:

If discrepancies are identified, students must provide corrected information or additional documentation. The university will make necessary corrections and update the FAFSA® through CPS, if required.

Student Responsibilities

1. Students must provide requested documentation to the Financial Aid Department within **30 days of notification**.
 2. Failure to complete verification will result in the inability to process or disburse financial aid.
 3. Students are responsible for ensuring the accuracy of submitted documentation and for responding promptly to any additional requests for information.
-

Revised Financial Aid Offers

If the verification process results in changes to the student's FAFSA® information, the Financial Aid Department will:

1. Recalculate the student's eligibility.
 2. Adjust the financial aid offer accordingly.
 3. Notify the student of any changes via email or the institution's online portal.
-

Referral of Fraud or Misconduct

In cases of suspected fraud or criminal misconduct related to a student's financial aid application, the university will refer the case to the **Office of Inspector General (OIG)** for investigation, as required by federal regulations.

Deadlines and Timing

1. Students must complete the verification process before any federal, state, or institutional aid is disbursed.

2. Verification must be completed within the award year deadlines specified by the U.S. Department of Education.

Annual Review

This policy is reviewed annually and updated to ensure compliance with the most recent federal guidelines, including the FSA Handbook and **34 C.F.R. § 668.53**.

ADMINISTRATIVE REVISIONS TO FINANCIAL AID PACKAGE

The Financial Aid Department reserves the right to revise your aid package without prior notice. These reasons include but are not limited to:

- Outside aid received is higher than originally assumed
- Outside resources were not taken into account
- Factors make the student ineligible for the aid offer
- Enrollment status changes
- Insufficient information

RECALCULATION OF ELIGIBILITY

A student will be paid based on their most current FSS/ISIR SAI and enrollment status at the census date (add/drop date) within each term. An offer will be recalculated if the student's enrollment status changes from the first day of class to the census date and a new offer will be generated. If a new or updated FSS/ISIR is received after the semester census date, then Title IV funds will be offered/recalculated based on the new or updated FSS/ISIR.

If an adjustment is made to a student's financial aid package, the Financial Aid Department will release a revised offer to the student via email.

PROFESSIONAL JUDGMENT

If the student finds his or herself in an unusual circumstance that may affect their Title IV eligibility, the Financial Aid Department staff, using professional judgment, can adjust one or more of the data elements used to calculate the SAI or COA depending on the circumstances. The adjustment must be based on a student's individual circumstances and must be

documented in the student's file. Students can request a professional judgement adjustment with the Financial Aid Department to initiate this process. Professional judgement requests are handled on a case by case basis.

A special circumstance refers to financial situations such as the loss of a job that justify an aid administrator adjusting data elements in the Cost of Attendance or SAI calculations.

An unusual circumstance is a condition that justifies an aid administrator making an adjustment to a student's dependency status based on a unique situation such as human trafficking, refugee or asylee status, parental abandonment, or incarceration. This is commonly called a dependency override

The Financial Aid staff will note in the student's records any unusual situation that explains any special consideration given to the student when determining financial need. In most cases students will need to provide documentation and/or letters of support. Professional judgment documentation must be cited in the student file with appropriate documentation attached. Changes to student applications made as a result of professional judgment do not renew each award year. Students will need to request a professional judgment review each award year, and provide updated documentation.

REVIEW OF DEPENDENCY STATUS (DEPENDENCY OVERRIDE)

If the student finds themselves in an unusual circumstance that affects their dependency status, the Financial Aid Staff can submit a dependency override with sufficient documentation of the situation on a case-by-case basis. The student will need to provide a request to review their financial aid application to the Financial Aid Department. He/she will also need to provide a written statement describing their situation along with two (2) supporting statements from a non-related, third party. The following situations listed below do not qualify as an unusual circumstance requiring dependency override status:

1. Parents refuse to contribute to the student's education:
2. Parents are unwilling to provide information on the FAFSA or for verification;
3. Parents do not claim the student as a dependent for income tax purposes;
4. Student demonstrates total self-sufficiency

UNACCOMPANIED YOUTH DETERMINATION

Purpose

To establish a clear, compliant process for identifying, verifying, and providing financial aid to Unaccompanied Homeless Youth (UHY) in accordance with the Higher Education Act (HEA) Sec. 479A(c) and 480(d)(9).

Definitions

1. Unaccompanied Homeless Youth (UHY):

- A student who meets the following criteria:
 - **Unaccompanied:** Not in the physical custody of a parent or guardian.
 - **Homeless:** Lacking fixed, regular, and adequate housing, including situations such as living in shelters, motels, cars, or temporarily with others due to economic hardship or similar reasons.
 - Determined as such by:
 - A school district homeless liaison.
 - A director of an emergency or transitional shelter funded by the U.S. Department of Housing and Urban Development (HUD).
 - A director of a runaway or homeless youth basic center or transitional living program.
2. **At Risk of Homelessness:** A student whose living situation is unstable and could lead to homelessness.

Policy

1. Eligibility for Independent Student Status:

- Students determined to be UHY are considered independent for financial aid purposes and do not need to provide parental information on the Free Application for Federal Student Aid (FAFSA).
- The determination of UHY status must occur annually.

2. Acceptable Documentation for Determination:

- Written verification from one of the following:
 - A local school district homeless liaison.

- A director or designee of a HUD-funded shelter or program.
- A director or designee of a runaway or homeless youth basic center or transitional living program.
- If none of the above is available, a documented interview conducted by the financial aid administrator (FAA) may serve as the basis for determination.

Procedure

1. Application Process:

- Students applying for financial aid as UHY must indicate their status on the FAFSA.
- The financial aid office will reach out to students who indicate UHY status to request supporting documentation.

2. Verification of UHY Status:

- Upon receiving documentation, the financial aid office will review it to confirm:
 - The student's homeless or at-risk status.
 - The student's unaccompanied status.
- If written documentation is unavailable, the financial aid office will conduct an interview with the student. This interview will include questions about their living situation, independence from parental support, and other relevant details.

3. FAA Determination:

- If the financial aid administrator makes the determination, the reasoning must be documented in the student's file, along with:
 - A summary of the student's living situation.
 - Evidence supporting the determination, such as letters from counselors, clergy, or community organizations.

4. Notification of Decision:

- The student will be notified in writing of the determination. If the determination is denied, the notification will include:
 - Specific reasons for the denial.
 - Information on how to appeal the decision.

5. Annual Redetermination:

- Annual Redetermination no longer required as of the 2024-2025 Award Year.

6. Confidentiality:

- Information about the student's UHY status is considered highly sensitive and will only be shared with relevant personnel on a need-to-know basis.
- All records will be securely maintained in compliance with FERPA regulations.

Training and Compliance

Financial aid staff will undergo regular training to ensure understanding and compliance with HEA requirements and best practices for working with UHY populations.

Review and Updates

This policy and procedure will be reviewed annually to ensure compliance with federal regulations and institutional practices.

ATTENDANCE VERIFICATION

The U.S. Department of Education requires that schools are able to document that students are actually in attendance to finalize their Federal Student Aid eligibility. For example, if a student doesn't begin attendance in all of his or her classes, the school must recalculate the student's award based on the lower enrollment status. A student is considered to have begun attendance in all of his or her classes if the student attends at least one day of class for each course in which that student's enrollment status was determined for Federal SEOG eligibility.

In a distance education context, documenting that a student has logged into an online class is not sufficient, by itself, to demonstrate academic attendance by the student. A school must demonstrate that a student participated in class or was otherwise engaged in an academically related activity, such as by contributing to an online discussion or initiating contact with a faculty member to ask a course-related question. A definition of attendance for Financial Aid Purposes can be found in the Westcliff University Catalog. WU documents attendance for Federal SEOG purposes by collecting on-line rosters from all instructors. The instructors use the rosters to indicate whether a student has attended or not. Students must attend each class that they are enrolled in, at least once at the beginning of each term to be counted as being in attendance in that class for Federal SEOG eligibility purposes.

In cases where students do not attend class at least once, Federal SEOG eligibility will be cancelled. If this cancellation results in a student not having sufficient grant funds to pay for any charges or advances that they have incurred or received, that student will be responsible to pay WU for the difference between their adjusted eligibility and the original amount of the cost of their tuition and fees as well as any advances that the student received.

Fund Disbursements

WU will credit Federal SEOG funds to your school account to pay for tuition, fees and other school related costs which appear on your student account (institutional charges). If you are eligible for funds in excess of your institutional charges, after completing eligibility verification, WU will pay you the difference directly by issuing you a check.

STUDENT LOAN COUNSELING (ENTRANCE AND EXIT COUNSELING)

<https://studentaid.gov/entrance-counseling/>

<https://studentaid.gov/exit-counseling/>

To ensure compliance with federal regulations and provide students with the necessary information and resources to make informed decisions about borrowing and repaying federal student loans.

Scope

This policy applies to all students who borrow federal student loans (Direct Loans, FFEL Loans, etc.) and are required to participate in entrance and exit counseling.

Policy Overview

Westcliff University will offer required entrance and exit counseling to federal student loan borrowers in compliance with the following regulations:

- 34 CFR 685.304(b) – Direct Loan Entrance and Exit Counseling
- 34 CFR 668.42 – Institutional Disclosure Requirements (pertaining to exit counseling)

Entrance Counseling

1. Required Participation:

- Entrance counseling is mandatory for all first-time federal student loan borrowers before they receive their loan disbursement.
- This applies to both undergraduate and graduate students borrowing federal Direct Loans (Subsidized, Unsubsidized, PLUS loans) and Federal Perkins Loans.

2. Timing and Delivery:

- Entrance counseling will be completed online on studentaid.gov

- Counseling must be completed prior to the disbursement of any federal student loan funds for the academic year. Students must receive confirmation of completion, which will be recorded in the financial aid system.

3. Content of Counseling: The entrance counseling must cover, at a minimum:

- The student's rights and responsibilities regarding the loan.
- A clear explanation of the loan terms, including interest rates, repayment options, and the impact of loan consolidation and deferment.
- Information on available repayment plans and loan forgiveness programs.
- A description of how the loan servicer will manage the loan and the borrower's role in communication with the servicer.
- Budgeting tips to help students manage educational expenses and loan repayment.
- Warning about the consequences of defaulting on the loan, including the impact on credit scores and future loan eligibility.

4. Recordkeeping:

- The university will maintain records of all students who complete entrance counseling, including confirmation of completion and the date it was completed.

Exit Counseling

1. Required Participation:

- Exit counseling is mandatory for all federal student loan borrowers (Direct Loans, FFEL Loans, Perkins Loans, etc.) when they graduate, withdraw, or drop below half-time enrollment.
- Students must complete exit counseling prior to the conclusion of their final semester or before leaving the university.

2. Timing and Delivery:

- Exit counseling is offered online at studentaid.gov
- The university will send a reminder to students at least 30 days before the expected date of graduation or withdrawal, informing them of their requirement to complete exit counseling.
- Counseling must be completed no later than 30 days after the student's withdrawal, graduation, or drop in enrollment status.

3. Content of Counseling: The exit counseling must cover, at a minimum:

- A detailed explanation of the borrower's rights and responsibilities after leaving school.
- Loan repayment terms, including interest rates, deferment options, and repayment plans.
- The options available to students who are unable to make payments, including deferment, forbearance, and income-driven repayment plans.
- A clear explanation of the loan servicer(s) and how to contact them for assistance.
- Information about the consequences of defaulting, including default-related penalties and how default affects a borrower's credit.
- Resources for managing loan repayment and a link to the National Student Loan Data System (NSLDS) to view loan balances and servicer contact information.

4. Recordkeeping:

- The university will maintain records confirming that the student was notified to complete the exit counseling including the date of the notification

Additional Support

For students needing additional assistance or clarification, Westcliff provides access to financial aid counselors who can answer questions regarding loan repayment and offer personalized financial management support.

ANNUAL AND AGGREGATE STUDENT LOAN LIMITS

BORROWER TYPE	DEPENDENT UNDERGRADUATE		INDEPENDENT UNDERGRADUATE		GRADUATE and PROFESSIONAL DEGREE
	Annual Limit	Maximum Subsidized Eligibility	Annual Limit	Maximum Subsidized Eligibility	Annual Limit
FRESHMAN	\$5,500.00	\$3,500.00	\$9,500.00	\$3,500.00	\$20,500 - All graduate loans are unsubsidized as of 7/1/12
SOPHOMORE	\$6,500.00	\$4,500.00	\$10,500.00	\$4,500.00	
JUNIOR	\$7,500.00	\$5,500.00	\$12,500.00	\$5,500.00	
SENIOR and BEYOND	\$7,500.00	\$5,500.00	\$12,500.00	\$5,500.00	
TOTAL AGGREGATE LOAN LIMITS	\$31,000.00	\$23,000.00	\$57,500.00	\$23,000.00	\$138,500.00

DISBURSEMENT OF REFUNDS

Westcliff University takes a conservative approach with student loan borrowing. Student loans are a great responsibility and should be used as a tool to achieve one's educational goals. The University understands that excessive student loan borrowing may result in the student and/or parent experiencing difficulties during the repayment period. The flexible nature of the University's programs gives students the opportunity to obtain employment while pursuing their educational goals.

As a result, Westcliff University will recommend limiting credit balances (resulting from student loans) on student accounts when possible. Under HEA Sec. 479(A)(c), 34 CFR 685.301(a)(8), schools may not limit student and parent Direct Loan borrowing. If a student and/or parent requests to maximize their respective loans for the applicable loan period (up to the annual loan limits or Cost of Attendance), the University will honor the request. All Title IV refunds will be returned within 14 from when the financial aid credit balance occurs on a student's ledger card.

RECORDS RETENTION

Student records are maintained on-line for a minimum of five (5) years after and the institution keeps records of student transcripts permanently. Students have access to their own personal records during regular business hours upon reasonable written notice, but access can only be granted in the presence of a duty-authorized representative of the President's or Dean's office, and each review of a personal file by a student will be noted in the file.

SATISFACTORY ACADEMIC PROGRESS (SAP)

Satisfactory Academic Progress for Degree Programs

Purpose

The Satisfactory Academic Progress Policy outlines the expectations and criteria for satisfactory academic progress for students at Westcliff University. This policy aims to ensure that students maintain consistent academic performance, meet program requirements, and make timely progress towards their educational goals.

Definition of Satisfactory Academic Progress

Satisfactory Academic Progress (SAP) is a measure of a student's successful completion of coursework and progression toward the completion of their degree or program. SAP is evaluated based on quantitative (e.g. completion rate or pace) and qualitative (e.g., GPA) criteria.

Evaluation Period

SAP will be assessed at the end of each academic year or program change to determine if students are meeting the established criteria. This includes regular semesters, summer sessions, and any other terms as applicable.

Quantitative Criteria: Completion Rate (PACE)

Students must successfully complete at least 50%-67% of attempted credits each term depending on their credits earned and transferred in.

Master's and Doctoral Student Completed Credit Threshold (Transferred Semester Credits + Earned Semester Credits)	Minimum Credit Completion Rate
Level 1: 0 – 18 Credits	50%
Level 2: ≥ 19 Credits	67%

Undergraduate Student Completed Credit Threshold (Transferred Semester Credits + Earned Semester Credits/Transferred + Attempted)	Minimum Credit Completion Rate
Level 1: 0 – 24 Credits	50%
Level 2: ≥ 25 Credits	67%

Withdrawn Courses: Withdrawn courses (W): these grades count towards a student's PACE, but do not impact their GPA.

Incomplete Courses: Incomplete courses (I): these courses count towards both PACE and GPA. The units attempts are factored into a student's PACE immediately, but are not factored into the GPA until a final grade is awarded.

Repeated Courses: If a student repeats a course, only the most recent attempt will be factored into their GPA, but each attempt will count towards a student's PACE.

Quantitative Criteria: Grade Point Average (GPA)

Master's and Doctoral Student GPA Threshold	GPA
Level 1: 0 – 18 Credits	2.75
Level 2: ≥ 19 Credits	3.0

Undergraduate Student GPA Threshold	GPA
Level 1: 0 – 24 Credits	1.75
Level 2: ≥ 25 Credits	2.0

Academic Probation Status/Financial Aid Probation Status

- Students who do not meet SAP criteria for the first time must submit an appeal (see Appeal Process) to be placed on Academic Probation/Financial Aid status.
- Students on Academic Probation/Financial Aid status will have an Academic Plan that outlines specific criteria achieving satisfactory academic standing.
 - Students on Academic/Financial Aid Probation will be reviewed after each payment period to ensure they are meeting the conditions of their plan. If they are not meeting, they will be Academically Disqualified from the University.

Academic Disqualified

- Students on Academic/Financial Aid Probation who do not meet SAP according to their outlined Academic Success Plan will face Academic Disqualification.

Academic Dismissal

- Students that do not meet SAP after an evaluation period and do not submit an approved appeal to go onto Academic Probation will be Academically Dismissed.

Appeal Process

- Students may appeal to be on Academic/Financial Aid Probation and Financial Aid eligible by submitting a written appeal to the Satisfactory Academic Progress Appeals Committee
- The Appeal must include a detailed explanation of the circumstances leading to academic difficulties and an Academic Success Plan for improvement.
- The Satisfactory Academic Progress Appeals Committee will review appeals and make decisions based on the merits of each case.
 - If appeal is approved, student will be reviewed for SAP every payment period until they either meet SAP, or if they are not meeting the conditions of their Academic Success plan, they will be Academically Disqualified from the institution.
 - If appeal is denied, student will be Academic Dismissed from the institution
 - Or resubmit appeal request

Student Notification of SAP Status Changes

- Students are automatically notified of academic/financial aid status changes that occur in their academic record.
- Students utilizing Scholarships, Financial Aid or Veterans Benefits of any type will be notified of the impact on their funding as the status changes occur.

Satisfactory Academic Progress for Certificate Programs*

The certificate program SAP is same as above policy with the **exception** of:

Evaluation Period

SAP will be assessed at the end of each semester to determine if students are meeting the established criteria. This includes regular semesters, summer sessions, and any other terms as applicable.

Quantitative Criteria: Completion Rate (PACE)

Students must successfully complete at least 50%-67% of attempted credits each term depending on their credits earned and transferred in.

Certificate Completed Credit Threshold (Transferred Semester Credits + Earned Semester Credits/Transferred + Attempted)	Minimum Credit Completion Rate
Level 1: 0 – 9 Credits	50%
Level 2: \geq 10 Credits	67%
*Certificate programs of 9 credits or less must meet 67% Quantitative by the end of the first semester.	

Withdrawn Courses: Withdrawn courses (W): these grades count towards a student's PACE, but do not impact their GPA.

Incomplete Courses: Incomplete courses (I): these courses count towards both PACE and GPA. The units attempted are factored into a student's PACE immediately, but are not factored into the GPA until a final grade is awarded.

Repeated Courses: If a student repeats a course, only the most recent attempt will be factored into their GPA, but each attempt will count towards a student's PACE.

Academic/Financial Aid Warning Status

- Students who do not meet SAP criteria for the first time will be placed on academic/financial aid warning for the subsequent evaluation period.

COURSE RETAKES

Students may choose to repeat a course they have already taken for a number of reasons. A student can repeat any course in which they earned a letter grade of C- or below without further approval; the threshold for repeating benchmark courses without further approval is a B-. Students who wish to repeat courses in which they received grades higher than previously stated would need the approval of the College dean. The highest grade a student achieves across multiple attempts of a course represents the grade calculated into the student's program GPA (PGPA) for consideration of graduation.

Students may attempt a course up to three times without approval. Additional course attempts require a consultation with the dean of the College that hosts the course and approval from the Appeals Committee. The appeals Committee considers a student's potential to be successful attempting additional course repeats in determining approval. Students who are denied the ability to repeat required courses for which they have not earned the necessary passing grade
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may be prohibited from continuing their program of study. In this case students are required to submit an Appeal Request form.

Students denied an opportunity to retake a required course may complete an equivalent course at another institution and transfer the credit back to Westcliff University. Any attempt to do so should be done in consultation with the College dean to ensure an appropriately equivalent course was taken. A student may continue their program of study while being concurrently enrolled in the equivalent course at another institution with the written permission of the College dean. Courses taken at another institution and transferred in the credits for the course(s) repeated, along with the previous attempts at Westcliff, will reflect record history and transcripts. This will affect their pace and/or GPA.

Grade	Interpretation	Average Value	Grade Point Value (GPA)
A	Superior	100-93%	4.00
A-	Excellent	90-92%	3.67
B+	Good	87-89%	3.33
B	Good	83-86%	3.00
B-	Good	80-82%	2.67
C+	Average	77-79%	2.33
C	Average	73-76%	2.00
C-	Average	70-72%	1.67
D+	Poor	67-69%	1.33
D	Poor	63-66%	1.00
D-	Poor	60-62%	0.67
F	Failing	60%-Below	Fail
I	Incomplete	N/A	
W	Withdraw	N/A	

INSTITUTIONAL REFUND POLICY

The student has the right to cancel the enrollment agreement and obtain a refund of charges paid through attendance at the first class session, or the seventh day after enrollment, whichever is later. In addition, the student may cancel, withdraw, or drop a course after instruction has started and receive a pro rata refund for the unused portion of the tuition. Refunds are calculated based on the week that the student withdraws from the University. Below you will find some examples of the refund calculated. The University's institutional refund policy is separate from the Federal Return of Title IV Funds (R2T4) calculation, which is previously covered.

The Business Office completes an Institutional Refund Calculation for all students who withdraw or are dismissed from Westcliff University, using the Institutional Refund Calculation worksheet. All refunds due to students will be paid within 30 days of cancellation, drop or withdrawal.

The prorated refund policy works in accordance with a percentage by week courses.

8 Week courses:

Week 1 of the course (Monday-Sunday) is eligible for a 100% Tuition Refund

Week 2 of the course (" ") is eligible for 80% Tuition Refund

Week 3 of the course (" ") is eligible for 60% Tuition Refund

Week 4 of the course (" ") is eligible for 40% Tuition Refund

Week 5 of the course (" ") is eligible for 20% Tuition Refund

Anything from week 6 to week 8 is not eligible refund so 0%

16 Week Course:

Week 1 of the course (Monday-Sunday) is eligible for a 100% Tuition Refund

Week 2 of the course (Monday-Sunday) is eligible for a 100% Tuition Refund

Week 3 of the course (" ") is eligible for 80% Tuition Refund

Week 4 of the course (" ") is eligible for 80% Tuition Refund

Week 5 of the course (" ") is eligible for 60% Tuition Refund

Week 6 of the course (" ") is eligible for 60% Tuition Refund

Week 7 of the course (" ") is eligible for 40% Tuition Refund

Week 8 of the course (" ") is eligible for 40% Tuition Refund

Week 9 of the course (" ") is eligible for 20% Tuition Refund

Week 10 of the course (" ") is eligible for 20% Tuition Refund

Anything from week 11 to week 16 is not eligible refund so 0%

RETURN OF TITLE IV FUNDS (R2T4)

How a Withdrawal Affects Financial Aid

This policy outlines the process for the return of unearned Title IV funds (grants and loans) when a student receiving federal financial aid withdraws, ceases attendance, or fails to complete the period for which they were awarded aid. The policy ensures compliance with federal regulations [34 CFR § 668.22; 34 CFR § 668.43; 34 CFR § 668.41(a)] and informs students of their responsibilities and potential financial liabilities. This policy is subject to revision without notice based on changes to federal laws and regulations or Westcliff policies. If changes are made, the student is held to the most current policy. This statement is intended to provide an overview of policies and procedures related to a complicated and very encompassing regulation. Additional information, including examples of R2T4 calculations, is available in the Office of Financial Aid.

Scope

This policy applies to all students receiving Title IV aid, including:

- Federal Pell Grants
- Federal Supplemental Educational Opportunity Grants (FSEOG)
- Federal Direct Subsidized and Unsubsidized Loans
- Federal Direct PLUS Loans

Title IV (federal) financial aid funds are awarded under the assumption that a student will remain in classroom attendance for the entire period (term) for which the funds were awarded.

When a student withdraws from all courses, regardless of the reason, s/he may no longer be eligible for the full amount of Title IV funds originally awarded. The return of funds to the federal government is based on the premise that a student earns financial aid in proportion to the length of time during which s/he remains enrolled. A prorated schedule determines the amount of federal student aid funds s/he will have earned at the time of full withdrawal. For example, a student who withdraws in the second week of the term has earned less of his/her

financial aid than a student who withdraws in the third week. Once the 60% point in the term is reached, a student is considered to have earned all of the financial aid originally awarded and will not be required to return any funds. The 60% point is reached during the fifth week of all standard eight-week classes.

Federal regulations require a recalculation of financial aid eligibility if a student:

1. *Completely withdraws;*
2. *Stops attending before the term's end;*
3. *Does not complete all modules (mini-sessions) in which the student is enrolled as of the start date of the mini session.*

Westcliff University students who receive federal financial aid and who do not remain in attendance through the end of the term could be responsible for repaying a portion of the financial aid originally received. Students who do not begin attendance in classes are not eligible for federal financial aid and must repay all aid originally received.

Note: *Westcliff's institutional tuition refund policy is separate from federal regulations to return unearned aid. Receiving a tuition/fee refund from Westcliff has no impact on the amount the student must repay to federal aid programs.*

Return of Title IV Funds Process

Financial aid recipients “earn” the aid they originally received by remaining in classes. The amount of federal assistance earned is based on a prorated system. Students who withdraw or do not complete all classes in which they were enrolled may be required to return some of the aid originally awarded. Westcliff is required to determine the percentage of Title IV aid “earned” by the student and return the “unearned” portion to the appropriate federal aid programs.

Westcliff University is an attendance taking institution and when a student misses 14 consecutive days (to include weekends, holidays and scheduled breaks) the school will evaluate and determine if the student has withdrawn. Westcliff is required to perform this calculation within 30 days of the date the school determines that a student has completely withdrawn. The school must return the funds within 45 days from the Date of Determination to return all Title IV that needs to be returned per the FISAP. The R2T4 calculation is completed by the Office of Financial Aid.

The following explains the formula used to determine the percentage of unearned aid to be returned to the federal government:

1. *The percentage earned is equal to the number of calendar days completed up to the withdrawal date divided by the total number of calendar days in the payment period.*

2. *The payment period for most students is the full, 16-week fall, spring, and summer terms. Each term includes two 8-week sessions (modules).*
3. *The percent unearned is equal to 100% less the percent earned.*

Breaks between periods of payment are not included in the count of total days in the payment period.

Institutional scholarship funds are not subject to the R2T4 policy for:

1. *Students enrolled in modules*
2. *Post-withdrawal disbursement of loan proceeds.*

When the R2T4 calculation results in the student being eligible to receive either Federal Direct Stafford Subsidized or Unsubsidized Loan proceeds, s/he will be contacted via e-mail by the Office of Financial Aid. Written authorization from the student will be requested and is required before loan proceeds can be processed and awarded to the student. Students have two (2) week to provide any written authorization for post-withdrawal funds or remain ineligible.

Determination of Withdrawal Date

The withdrawal date used in the R2T4 calculation is the actual last date of attendance or engagement on the student information system, GAP, and/or communication from the Office of the Registrar.

Withdrawal Prior to the 60% Point of a Payment Period

Unless and until a student completes 60% of the term in which financial aid was awarded, the student will be required to return all or part of the financial aid originally awarded for the term. The R2T4 calculation is not required (but may be performed) if students complete over 60% of the payment period.

When a Student Fails to Begin Attendance

If financial aid is processed for a student who never begins attendance in any class for which they registered in a term, all aid will be canceled and returned within 60 days of when Financial Aid was notified the student did not begin attendance. The bi-weekly LDA (Last Date Attended) report is used to determine students that failed to begin attendance. Financial aid originally awarded is canceled for students who failed to begin attendance in all classes in which they were originally enrolled and is adjusted for those who fail to begin attendance in a portion of the classes in which they were originally enrolled.

When a Student Fails All Classes

If a financial aid recipient who has not officially withdrawn fails to receive a passing grade in at least one (1) class during the term, the Office of Financial Aid will determine whether the student actually established eligibility for the aid originally awarded.

Order of Return to Federal Aid Programs

In accordance with federal regulations, unearned aid will be returned to the federal programs in the following order:

1. *Federal Direct Loans: Unsubsidized, then Subsidized*
2. *Federal Direct Parent Loans*
3. *Federal Pell Grant*
4. *Federal Supplemental Educational Opportunity Grant*

LEAVE OF ABSENCE POLICY

Students enrolled in term enrollment programs that are unable to enroll in one or more terms may apply for a temporary Leave of Absence (LOA) from the university. This policy is designed to allow a student the flexibility to take a temporary break from their academic program and upon return a student will not be required to apply for readmission to the university. A student will not be granted a LOA in the middle of a term, therefore for purposes of Title IV a student granted a temporary LOA will be considered withdrawn from the university during this time. An R2T4 will be completed and the student will have to apply for readmission.

A student is expected to complete all courses if currently enrolled in a term and apply for a LOA to begin at the start of the next term in the academic program. If a student is having difficulty or unable to complete all courses in the term they may apply for an incomplete, an incomplete for special circumstance or withdraw, in which case a Return of Title IV calculation may be required.

Students may apply for an LOA by submitting the leave of Absence Request form, which they can obtain from the Student Services Department. LOAs must be approved by the office of the Registrar. A temporary LOA from the university will only be granted to a student planning to return to their academic program at the end of the LOA. In addition, for undergraduate and graduate students the LOA request may not exceed more than 180 days within a 12 month period. A student may request more than one LOA during their academic program not to exceed 180 days within a 12 month period. A student may return from a LOA early and resume enrollment in the next available term or enrollment period.

Important facts concerning a Leave of Absence:

- A student will not be eligible to receive federal student aid while on a LOA;

A student who fails to return from a LOA will be withdrawn and required to reapply for admissions to the University after a period of 12 months of inactivity in their academic program.

DEFAULT PREVENTION AND MANAGEMENT PLAN

The ultimate purpose of the Default Prevention and Management Plan is to assure that student loan borrowers who attend Westcliff University successfully repay their student loans. The University understands that situations arise where students experience a temporary setback in their repayment schedule. Westcliff University wants student loan borrowers to know all the options available to them from the grace period all the way through the repayment period. Below are methods Westcliff University promotes responsible student loan borrowing:

- Keeps in touch with its borrowers.
- Frequently reviews borrowers' in-school status to ensure that it recognizes instances in which borrowers withdraw without notice.
- Provide students with information about IonTuition and their default prevention assistance and education.
- Contacts borrowers during their grace period to remind them of the importance of the repayment obligation and provide them with the electronic brochure for IonTuition and their assistance.
- IonTuition tracks borrowers' delinquency status by obtaining reports from Federal Family Education Loan Program guarantee agencies and lenders and from the U.S. Department of Education for Federal Direct Loan Program borrowers.

Requests for Borrower Information

- During entrance and exit counseling, obtain information from borrowers regarding references and family members beyond those requested on the loan application, and ask for cell phone numbers and email addresses for borrowers and for family members;
- During exit counseling, obtain updated information from borrowers including their addresses, cell phone numbers, email addresses, current employment information and addresses of their references and various family members.

Provide Information about Repaying the Loan

- Estimated balance of loan(s) when the borrower completes the program;
- Interest rate on the borrower's loan(s);

- Name, address and telephone number, and website for the borrower's federal loan servicer(s);
- During exit counseling, provide a sample loan repayment schedule based on the borrower's total loan indebtedness;
- Estimated monthly income that the borrower can reasonably expect to receive in his or her first year of employment based on the education received at your school;
- Estimated date of the borrower's first scheduled payment.

Reminders about Personal Financial Management and Title IV Loans

- IonTuition is available to provide financial literacy resources to borrowers at enrollment, throughout attendance, and following graduation or withdrawal;
- Students are reminded to borrow only what is needed and can cancel or return any funds in excess of what is needed;
- Borrowers must inform their federal loan servicer immediately of any change of name, address, telephone number, or social security number;
- If a borrower is unable to make a scheduled payment, he or she should contact the lender before the payment's due date to discuss a change in repayment plan, repayment options, and deferment and forbearance options.

VETERANS EDUCATION BENEFITS

Westcliff University proudly supports America's veterans and active duty military personnel. We are committed to serving them with the same integrity with which they served our country. Our goal is to provide them with the education they need to help them to pursue and achieve the success they deserve. Below is a summary of the veteran's education benefits that are currently available to eligible service members.

VA pays benefits to eligible Service Members and Veterans pursuing an approved education or training program. There are education benefit programs that cover Active Duty, National Guard, and Reserve Service Members and Veterans:

- Post-9/11 GI Bill (Chapter 33)
- Yellow Ribbon
- Montgomery GI Bill-Active Duty (Chapter 30)
- Montgomery GI Bill-Selected Reserve (Chapter 1606)
- Survivors and Dependents Assistance (Chapter 35)

- Vocational Rehab (Chapter 31)

The Financial Aid Department will process eligible Service Members using VA education benefits through Enrollment Manager provided by the Veterans Affairs Department. Enrollment certification will be done prior to the beginning of each semester. Any changes in schedule that occur mid-semester will be reported to the VA, and as such, a financial adjustment may occur when and if necessary.

All Chapters must fill out an application available online at www.gibill.va.gov. To ensure correct processing please provide a copy of your DD-214 and Certificate of Eligibility to the Financial Aid Department. Westcliff University does not determine benefit eligibility or payment details; we simply certify your enrollment to the VA. All processing questions should be directed to the VA for resolution.

Veterans Education Benefits Summary Post 9/11 GI Bill – Chapter 33

This program is for student-veterans who have served at least 90 aggregate days on active duty beginning on or after Sept. 11, 2001, or who were honorably discharged from active duty due to a service-related disability after serving 30 continuous days beginning on or after Sept. 11, 2001. Active duty time will determine tuition percentage benefit eligibility that expires 15 years after separation. Additional benefits include tuition and fee payment to school of choice and a book stipend of up to \$1,000 per year. VA pays school directly.

Montgomery GI Bill (MGIB) - Chapter 30

Under Chapter 30, active-duty members enroll and pay \$100 per month for 12 months. They are then entitled to receive a monthly education benefit once they have completed a minimum service obligation. Eligible veterans have 10 years after leaving the military to use this benefit. Student pays tuition.

Montgomery GI Bill for Reservists (MGIB-SR) - Chapter 1606

A reservist soldier must be actively training and have a six-year obligation in the reserve unit to be eligible for this program. This benefit is based on the student's enrolled credit status, meaning full time, part time, or less have prorated amounts paid out to the soldier's direct deposit. Student pays tuition.

Reserve Educational Assistance Program (REAP) – Chapter 1607

For a reservist activated for more than 90 days after Sept. 11, 2001, the monthly benefit will reflect the length of title 10 orders. This benefit is based on the student's enrolled credit status, meaning full time, part time, or less have prorated amounts paid out to the soldier's direct deposit. Student pays tuition.

Survivors and Dependents Education Assistance (DEA) – Chapter 35

Dependents educational assistance provides education and training opportunities to eligible dependents of certain veterans. Review education benefits information and application on our website: www.tri-c.edu/gi-bill. *VA pays school directly.*

Vocational Rehabilitation - Chapter 31

Veterans with a service-related disability rating of at least 20 percent are eligible. VA pays costs such as tuition and fees, books, supplies and equipment. VA will also pay a monthly benefit to help with living expenses. *VA pays school directly.*

VA Office and Resources

The VA Regional Processing Office for California is in Muskogee, OK (PO Box 8888, Muskogee, OK 74402-8888).

APPENDIX

DESIGNATION OF DUTIES

Financial Aid Advisor

The Financial Aid Advisor's role is to assist with the Admissions Department on achieving Westcliff University's enrollment goals. Below are duties that the Financial Aid Officer will be assigned to fulfill this role:

- Work in conjunction with the Admissions Department to complete financial aid process for prospective students. Routinely follow up with students until all required documentation is complete.
- Conduct virtual and in-person meetings with prospective students and/or parents. Assist with FSA ID registration and FAFSA completion.
- Present aid offers and funding options for program balance, if balance exists.
- Complete verification process for selected applicants.
- Resolve conflicting information and other flags on FAFSA applications when present.
- Review financial aid history through NSLDS, addressing any issues or flags.
- Provide loan entrance counseling and assist with Master Promissory Note (MPN) completion.
- Assist students with completion of financial aid forms, ensuring full understanding of rights and responsibilities.
- Package student aid in FAMS.
- Prepare financial aid file(s) for review by QC.
- Attend training webinars to expand financial aid knowledge.
- Complete additional duties as assigned.

Supervisor, Financial Aid

The Supervisor's role is to supervise the Financial Aid Department staff ensuring department demands are met. The Supervisor will perform the Financial Aid Officer's duties, as well as the following duties below:

- Meet with prospective students who are eligible for Veterans Affairs' benefits, reviewing eligibility and processing benefits every semester.

- Review Financial Aid Officer files for quality assurance and compliance, documenting file errors for performance evaluation and training opportunities.
- Input and submit prospective student awards onto FAMS
- Perform R2T4 calculations for withdrawn and/or dismissed students.
- Attend training webinars and industry conferences to further expand financial aid knowledge.
- Repackage continuing students' financial aid.
- Complete additional duties as assigned.

Director, Financial Aid

The Director's role is to ensure that the Westcliff University Financial Aid Department is in full compliance of all Federal and state regulations relating to the administering of student aid. In addition to being able to perform the duties of the Financial Aid staff, the Director will perform the following duties:

- Supervise personnel in accordance with college policies and applicable laws. Responsibilities include: interview, hire, and train employees; plan, assign, and direct work; reward and discipline employees or make such recommendations to the appropriate manager; address complaints and resolve problems. Completes performance evaluations for Financial Aid staff.
- Lead staff meetings, share information as appropriate, promote the development of ideas for improved service and efficiency, and encourage teamwork.
- Coordinate and manage all financial aid programs, ensuring compliance with all federal, state, and institutional financial aid regulations, policies, and procedures.
- Facilitate coordination and communication between respective college departments as they relate to the Financial Aid Department's role in creating a positive educational experience for students. Integrate efforts to maximize Financial Aid's role in recruiting, retention, and student loan repayment.
- Maintain current knowledge of college financial aid policies, procedures, and programs. Attend trainings/conferences as necessary to keep knowledge current.
- Collaborate with the Director of Recruitment and Admissions to participate in outreach activities where financial aid presentations will be needed (i.e. high schools, local agencies, online presentations, etc.).
- Authorizes release of funds to students and prepares required records and reports.
- Review Professional Judgement requests and R2T4 calculations.

- Assists with the development, implementation, monitoring, and revision of policies and procedures relating to the Financial Aid Department.
- Maintains the Financial Aid website with current information on a regular basis and updates federally mandated consumer disclosures.
- Complete annual file audit of Title IV recipients.
- Submit annual Fiscal report (FISAP) to the Department of Education.
- Participate in university committees pertaining to student enrollment, student retention, and campus improvement efforts.
- Prepares and manages the Financial Aid budget, payroll, staff schedules, monthly, and annual reports.
- Develop, implement, and maintain default prevention and management plan.
- Complete additional duties as needed.

DEPARTMENT PROCEDURES

Financial Aid Meeting

The purpose of the Initial Financial Aid Meeting is to present the student and/or parent with the estimated academic year costs, along with their financial aid eligibility to cover the estimated costs to attend Westcliff University. Before the meeting, the Financial Aid Officer (FAO) will create the prospective student's file folder, Initial Financial Aid Checklist, and print a Financial Aid Packet. FAO will then complete the following tasks:

- FAA states the purpose of the meeting and determines student and/or parent eligibility for Federal Student Aid.
- FAA will ask students if they are new to financial aid, or if they have used financial aid at a previous school.
- If a student has previously used financial aid, FAA logs on to the National Student Loan Database System (NSLDS) to retrieve Pell Grant history, Student Loan history, and adds student to Transfer Monitoring List.
- Assist students with FSA ID registration or FSA ID retrieval.
- Assist students with completing an applicable Free Application for Federal Student Aid (FAFSA) for the intended program start date.
- If FAFSA successfully submitted, FAA reviews the FAFSA confirmation page and explains eligibility to student.

- FAA then creates aid offer, packaging estimated awards based on the completed FAFSA application, and reviews information with student and/or parent, answering any questions.
- If there is an estimated remaining balance, FAA will explain options to cover balance with the student and/or parent.
- FAA distributes Financial Aid Packet to students and provides a brief explanation of the forms.
- FAA opens discussion to students and/or parent(s) to address any further questions or concerns. If no further questions.
- After the meeting, Faa enters meeting notes in the CRM and updates status, if applicable.

Follow up Financial Aid Meeting (virtual/in-person)

The purpose of the Follow up Financial Aid Meeting is to complete any outstanding financial aid forms or documents required to complete the student financial aid file.

- FAA will review the aid offer with student and/or parent again, confirming payment method for program of interest. Obtains necessary signatures once method of payment confirmed.
- Define what documents are outstanding.
- FAA will download applicable ISIR(s) and address any application issues with student such as: c-flags, verification flags, Pell Lifetime Eligibility Used (LEU), borrower loan history [Subsidized Usage Limits (SULA), Aggregate Loan Limits, Delinquent Borrower issues, DEFAULT issues], system and/or user errors.
- Assists students with completion of paperwork required to resolve issues with FAFSA application, if applicable.
- FAA will review the Initial Financial Aid Checklist to determine all required items/documents are completed.

File Review

Financial Aid files will go through two reviews for quality assurance and compliance purposes. *(Once adequate staffing levels are in place)*

- The initial FAO will perform the first review when the file is deemed complete, ensuring all documents are complete, appropriate signatures obtained, and all applicable checklist items are satisfied.
- File is transferred to the QC Department to perform final file review.

- Back-office Lead reviews the file to ensure accuracy and compliance.
- QC department documents file errors and addresses with FAA, providing follow up training to FAA (and/or staff) if trends in processing issues or errors are identified.
- Funding requests for Title IV files will be processed as follows: Pell and SEOG Grants, as soon as attendance is confirmed as well as loans for students with prior student loans. First time borrowers loans will be disbursed 30 days after the start of the term.

Verification

The Financial Aid Department will perform the following procedures for applicants selected for verification by the Department of Education:

- The Financial Aid Advisor assigned to the student file will send student an email notification that the applicable FAFSA is selected to be verified and provides the correct verification worksheet. Student is given a 30 day deadline to submit requested documentation.
- Follow up contact via email and phone calls and sms texts are made until documentation is submitted.
- The Financial Aid Advisor will review all submitted information and have the student make necessary corrections to the FAFSA. The Financial Aid Advisor will request further documentation if required.
- Students are contacted via phone, sms, and email if a change in award occurs due to verification. The Financial Aid Advisor will update the student's award letter and financial aid package within FAMS.
- If there is a reduction in student's Pell Grant eligibility, the ineligible amount will immediately be returned to the Department of Education to prevent an overpayment.

Requesting Title IV Payments (Drawing Down Funds)

The Financial Aid Department generates Title IV Disbursement Report on FAMS. The disbursement report will display the list of students who have scheduled Title IV funding. Title IV funding requests are transmitted to the Student Accounts Department for posting and a request is sent to the federal third-party processor to draw down funds.

Student Refund Disbursements

The Student Accounts Department will generate a Credit Balance Report at the time they post TIV disbursements. The report is sent to the Financial Aid Department to confirm, with the use of the student's Credit Balance form, if the Credit Balance is to be held until the end of the Award Year or if it is to be refunded to the student. Credit Balances that are determined to be refunded to the student are sent to the Finance Department to process refund checks. The Student Accounts Department will generate a credit balance report at the beginning of each new semester (Week 2) and at the beginning of each new session (Week 2). Credit Balance

reports will continue to be generated each week as disbursements are posted to address any changes to the student's ledger. The refund report will contain the following information:

- Semester Information
- Expected Date Funds Will Be Disbursed to the University
- Student Details: (First Name, Last Name, and Student ID Number)
- Amount of Refund

The refund report will be sent to the Finance Department for processing. The Student Accounts Department will log refund checks on to the Student's Accounts Ledger. The Student Accounts Department will notify the students via email when refund checks are available for pick up at the campus, checks are mailed out to students who do not respond to the email. All Title IV Credit Balances must be refunded within 14 days of the TIV posting on the students account ledger.

[Return to Title IV \(R2T4\)](#)

- The R2T4 processor will view the student's last day of activity on LMS and print proof. The latest date of attendance in the classes in which the student was enrolled will be used as the withdrawal date.
- The Financial Aid Department determines the amount of Title IV aid originally awarded and whether it is "disbursed" or "could have been disbursed."
- The student's original tuition and fees and bookstore charges are obtained from the student account ledger.
- An R2T4 worksheet is completed using the above data.
- The Student Accounts Department will post the Title IV refund amount for each fund type due to the R2T4 calculation within SIS.
- An email is sent to the Students Account Department notifying of the upcoming Title IV refund while containing: Student name, student ID, along with fund type and amount being returned.
- A copy of the R2T4 worksheet is maintained in the student's financial aid file..
- In the instances in which a student owes a federal grant repayment in addition to what Westcliff has returned to the federal programs, the student is notified in writing, via email, and the amount is reported by the Financial Aid Department as an overpayment.
- The student is responsible for all Westcliff charges and federal overpayments resulting from an R2T4 calculation.

COMMONLY USED FEDERAL STUDENT AID TERMS

Academic Year

A period that begins on the first day of classes and ends on the last day of classes or examinations and that is a minimum of 30 weeks (except as provided in 34 CFR 668.3) of instructional time during which, for an undergraduate educational program, a full-time student is expected to complete at least: (a) 24 semester or trimester hours; or (b) 36 quarter hours in an educational program whose length is measured in credit hours; or 900 clock hours in an educational program whose length is measured in clock hours.

Aid Package

A combination of financial aid (scholarships, grants, loans, and/or work-study) assembled by the Financial Aid Department of a college or university for an eligible recipient. This also includes institutional aid.

Allowable Charges

Educational expenses that a student incurs for which a school may credit a student's account with FSA funds. These charges may be credited to a student's school account and paid using FSA funds. These charges may include current charges for tuition and fees and room and board (if the student contracts with the school for these services). Other current charges that a student incurs for educationally related activities may be considered allowable charges if the school obtains the student's authorization (or parent's authorization for PLUS Loan funds) to have such charges paid with FSA funds. Allowable charges may also include certain minor charges for the previous award year. See *Current Charges*.

Aid Offer

As a noun, a specific amount of financial assistance to pay for education costs offered to a student through one or more financial aid programs. As a verb, approving financial assistance to students. A participating school makes a determination of the amounts and types of assistance it has available to offer to the student along with any other types of assistance the student may have received or will receive. Under 34 CFR 668.16(h), the school is required to provide information about the source and amount of each type of aid offered.

Offer

An official document issued by a Financial Aid Department listing the types and amounts of all the financial aid offered to the student. Generally, the offer includes information about the cost of attendance and terms and conditions for the financial aid.

Award Year

The time period from July 1st of one year through June 30th of the following year, for which financial aid awards are made. The award year differs from the federal fiscal year (October 1 through September 30). FFELP and Direct Loan funds are not tied to an award year.

Cancellation

Releasing a borrower from the obligation to repay all or a portion of his or her loan.

Capitalizing Interest

A process in which interest that has accrued but has not been paid is added to the loan principal. By increases the amount of the principal capitalization increases the total amount that must be repaid over time.

Cohort Default Rate

A measurement of the percentage of a school's borrowers who enter repayment in a federal fiscal year and default on their loans before the end of the next federal fiscal year.

Common Origination and Disbursement (COD)

The system for processing origination and disbursement reporting. The COD System accommodates the COD Process for Pell Grant and Direct Loan funding.

Cost of Attendance (COA)

The Cost of Attendance consists of the sum of educational costs payable to the school (also referred to as direct or billable costs) and costs paid to others (or indirect, non-billable or discretionary) costs. The Cost of Attendance represents the highest dollar amount of financial aid a student can receive during an award year.

Costs Paid to Others

Costs paid to others (also referred to as indirect, non-billable, or additional costs), are other expenses not paid directly to the school, but associated with receiving an education. These expenses are estimated by the school and may differ from student to student based on their individual circumstances. These expenses may include books, course materials, supplies, equipment, transportation and parking, personal expenses, childcare costs, computer costs, disability expenses, licensure expenses and off-campus rent and food

Costs Paid to the School

Costs Payable to the school (also referred to as direct or billable costs) generally include tuition, fees, housing, and meals/food (for students residing on campus), health insurance (if minimum

insurance coverage is not documented), or any other expenses paid to the school for enrollment.

Credit Balance (Title IV)

Refers to those Title IV funds that exceed the student's allowable charges. A school must pay this balance directly to the student (or parent, if PLUS Loan funds create the credit balance) as soon as possible, but no later than 14 days after the credit balance occurs (or no later than 14 days after the first day of classes of the payment period if the credit balance occurs on or before the first day of class).

Default

Failure to repay a student loan according to the agreed-upon terms of a promissory note. Default occurs at 180 days when the delinquency date is prior to 10/7/98, and 270 days when the delinquency date is on or after 10/7/98. The school, lender, and state and federal governments may take legal action against the borrower to recover defaulted loan funds.

Deferment

A period during which a borrower, who meets certain criteria, may suspend loan payments. For some types of loans, the federal government pays the interest during a deferment. On others, the interest accrues and is capitalized and the borrower is responsible for paying it.

Delinquency

Failure to make monthly loan payments when due. Delinquency begins with the first missed payment.

Dependent Student

A student who must provide parent information on the FAFSA. A dependent student is an undergraduate who is not married, is under 24 years of age, has no legal dependents, is not an orphan or ward of the court, nor a veteran of the U.S. Armed Force, and is not emancipated or homeless or at risk of being homeless.

Drawdown

A drawdown occurs when a school or COD, on behalf of a school, initiates a request for money through GAPS, and the funds are transmitted from the U.S. Treasury to the school's bank account.

Educational Loan

Money borrowed from the federal government, a college or university, or a private source like a bank or financial institution to pay for educational expenses and must be paid back with interest.

Electronic Master Promissory Note (eMPN)

A Web based Master Promissory Note. A student can complete and sign an MPN electronically instead of using a paper MPN. Users must have a PIN to initiate the process. Also see *Master Promissory Note*.

Eligible Borrower

A borrower or potential borrower who meets federal eligibility criteria for a Federal Stafford loan or, in the case of a parent borrower, a Federal PLUS loan.

Enrollment Status

An indication of a student's current status at the postsecondary institution. Status types include full-time, half-time, less than half-time, leave of absence, graduated, withdrawn, deceased, never attended, or no record found.

Entrance Counseling

First-year, first-time students borrowing federal educational loans are required to receive counseling before they receive their first loan disbursement, during which the borrower's rights and responsibilities and loan terms and conditions are reviewed.

Estimated Financial Assistance (EFA)

The school's estimate of the amount of financial assistance that a student has been or will be awarded for the enrollment period for which a loan is sought. The EFA includes assistance from federal, state, institutional, scholarship, grant, financial need-based employment, or other sources.

Exit Counseling (for a student borrower)

Institutions participating in the Federal Perkins Loan, FFELP, and Direct Loan Programs (excluding FFELP PLUS Loans and Direct PLUS Loans) must offer loan counseling called *exit counseling* to borrowers. For Federal Perkins Loan borrowers, the interview must take place before the borrower leaves school. In the case of FFELP and Direct Loan student borrowers, the interview must take place shortly before the borrower ceases to be enrolled at least half time.

Federal Loan

Also known as the Direct Loan Program, which allows eligible students and parents to borrow directly from the U.S. Department of Education at participating colleges or universities. Federal student loans include Direct Subsidized, Direct Unsubsidized and the Direct PLUS programs for parents of dependent students and graduate or professional students.

Federal Direct Subsidized Loan

A Direct Subsidized Loan is an undergraduate federal student loan based on financial need and offers students a reduced, fixed interest rate and flexible repayment terms. Interest is subsidized, meaning it does not accrue to the borrower, while in an in-school, grace, or deferment period. Annual and aggregate limits apply.

Federal Direct Unsubsidized Loan

An unsubsidized loan offers students a fixed interest rate and flexible repayment terms. It is not based on financial need. Interest begins to accrue when the loan is disbursed and can be paid while the student is enrolled or when loan repayment begins. Annual and aggregate limits apply.

Federal Direct Graduate PLUS Loan

Direct Graduate PLUS Loans are federal loans that graduate or professional students use to help pay for education expenses. A credit check for adverse credit history is required for eligibility. Interest begins to accrue when the loan is disbursed and can be paid while the student is enrolled or when loan repayment begins.

Federal Direct Graduate PLUS Loan

Direct Parent PLUS Loans are federal loans that parents of dependent undergraduate students can use to help pay for education expenses. Parents must pass a credit check for adverse credit history to qualify for PLUS loans.

Financial Aid Package

The total amount of financial aid (federal and nonfederal) such as scholarships, grants, loans, and/or work-study awarded to a student.

Financial Need

The difference between the cost of attendance at a college and the expected family contribution.

Grace Period

Specified period of time between the date a student graduates or drops below half-time status and the date loan repayment begins.

Independent Student

An applicant for FSA program assistance who meets certain criteria. To be classified as an independent student for FSA purposes, a student must meet at least one of the following criteria: (a) be at least 24 years old by December 31 of the award year for which aid is sought;

(b) be an orphan or be (or have been until the age of 18) a ward of the court; (c) be a veteran of the Armed Forces of the United States; (d) have legal dependents other than a spouse; (e) be a graduate or professional student; (f) be married; (g) have children; (h) be homeless or at risk of being homeless; (i) emancipated minor; or (j) in legal guardianship.

Ineligible Borrower

A borrower or potential borrower who does not meet federal eligibility criteria for an FSA student loan, or in the case of a parent borrower, a PLUS loan.

Institutional Student Information Record (ISIR)

An electronic output document generated by the FPS that summarizes information provided on a student's FAFSA. Also provides the result of the SAI calculation, results of eligibility matches with certain databases, reject reasons, comments, and data assumptions. It is available to schools through the Electronic Data Exchange (EDE).

Interest

A fee charged to the borrower for use of a lender's money.

Leave of Absence

A break in enrollment, not including semester or spring break(s), requested by the student and sanctioned by the school. A student on an approved leave of absence is not a withdrawal.

Loan Period

The period of enrollment for which a loan application is certified. Also known as period of enrollment.

Need Analysis

The process of determining the student's Student Aid Index (SAI) based on the formula established by Congress. Also known as *Federal Need Analysis Methodology and Federal Methodology*.

Office of Postsecondary Education (OPE)

OPE directs, coordinates, and recommends policies for programs that are designed to provide financial assistance to eligible students; improve postsecondary educational facilities and programs; recruit and prepare disadvantaged students for postsecondary programs; and promote the domestic study of foreign languages and international affairs, research, and exchange activities.

Office of Postsecondary Education Identifier (OPE ID)

An eight-digit identification number assigned by ED's Office of Postsecondary Education to an institution that has been approved to participate in the FSA programs. Schools that don't administer FSA funds but want their students to qualify for in school deferments also are assigned an OPE ID number.

Overpayment

Any financial aid amount paid to a student in excess of the amount the student is eligible to receive.

Parent

A student's biological or adoptive mother or father or the student's stepparent, if the biological parent or adoptive mother or father has remarried at the time of application.

Parent Loans for Undergraduate Students (PLUS)

PLUS loans enable parents to borrow federal funds to pay the education expenses of each child who is a dependent undergraduate student.

Payment Period

A school-defined length of time for which financial aid funds are paid to a student. For programs using academic terms (semester, trimester, or quarter), a payment period is equal to a term. For programs not using academic terms, schools must designate at least two payment periods within an academic year that meets all applicable regulations.

Potential Overaward (POP)

Federal Pell Grant recipients are allowed to receive a maximum of one full Scheduled Pell Grant during an award year. The COD System is programmed to calculate the percentage of Scheduled Pell Grant used each time a school reports a disbursement to the student. Any amount exceeding 100% of a full Scheduled Pell Grant represents an over award situation. The COD System allows a potential over award situation to exist for 30 days and sends a warning to all schools involved before reducing all of the students Pell Grant disbursements for that award year to zero.

Principal Balance

The outstanding amount of a loan on which the lender charges interest. As the loan is repaid, a portion of each payment is used to satisfy interest that has accrued and the remainder of the payment is applied to the outstanding principal balance.

Private Loan

A student or parent loan from a bank, credit union, private company, a nonprofit or state-affiliated lender, or from the college or university directly to pay for educational costs. Interest begins to accrue when the loan is disbursed, and repayment begins while the student is still enrolled in school.

Professional Judgment (PJ)

A provision in the Higher Education Act allowing financial aid administrators to adjust the data elements used to calculate the student's SAI. The exercise of professional judgment may increase a student's eligibility for financial aid. Professional judgment can be used only on a case-by-case basis, and the reason must be documented in the student's file.

Return of Title IV Funds (R2T4)

When a recipient of Title IV aid withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, the institution must calculate the amount of Title IV aid the recipient earned and return the unearned portion that it is responsible for and notify the student of any amount the student must return.

Satisfactory Academic Progress (SAP)

The qualitative (grade point average) and quantitative (time limit) measure of a student's progress toward completing a program of study. To maintain eligibility for FSA program assistance, the student must show continued progress. Schools must establish policies regarding satisfactory academic progress and must check the progress of FSA recipients at least once each academic year.

FAFSA Submission Summary (FSS)

The output document that the FPS sends to a student after a FAFSA is processed. It summarizes the information the student submitted on the FAFSA; reports the student's calculated SAI; provides comments to the student as well as information for the financial aid administrator; and reports the student's NSLDS financial aid history. Also see *Output Document and Institutional Student Information Record (ISIR)*.

Student Right-to-Know Act

The Student Right-to-Know Act requires disclosure of information on Graduation, Completion, and Transfer-Out Rates; and the Graduation, Completion, and Transfer-Out Rates for Student Athletes at schools that award athletically related aid.

Tuition

The amount of money charged for instruction and use of educational facilities such as libraries.



U.S. Department of Education (ED, the Department)

The Federal department that administers the Title IV programs.

Verification

The process a school follows to check the accuracy of the information reported by the student on the FAFSA. The information reported is compared against documents, such as signed federal tax forms and signed Verification Worksheets, the student provides to the school.

Withdrawal Date

The date the student withdraws, as determined by the school.

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