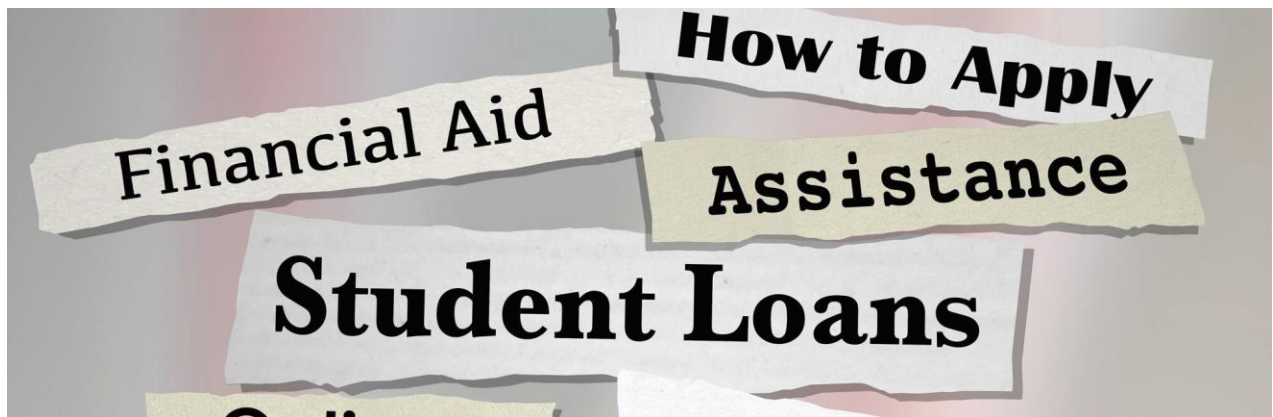




**PENNCO
TECH**

FINANCIAL AID 2020-2021
POLICIES AND PROCEDURES



PENNCO TECH FINANCIAL AID OFFICES

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FINANCIAL AID POLICIES AND PROCEDURES MANUAL
2020-2021
Pennco Tech
Financial Aid Office

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1.0 Manual Introduction

Today's Financial Aid programs for postsecondary students were established with passage of the Higher Education Act of 1965, as amended (HEA). The Department of Education offers a broad range of programs under the umbrella of the Higher Education Act. Federal, state and institutional financial aid programs have provided access to higher education for millions of students over the past four decades and, as such, have had a deep and lasting impact on the nation.

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

This manual is provided by the Office of Financial Aid for Financial Aid Administrators, institutional staff and at the request of any student it is available to them as well. The manual is constructed for office staff to better understand the Financial Aid programs and how Pennco Tech will deliver them. This manual does not and cannot present every circumstance that might occur. This manual is abridged from the statutory regulations governing federal, state and institutional Financial Aid programs. Any updates needed to this policy will be done in the electronic version of the manual located on the Financial Aid Office's drive on Pennco Tech's server. It is also available upon request and located on Pennco Tech's website under consumer information.

2.0 MISSION STATEMENT

Vision:

Pennco Tech's Financial Aid Office strives to be the leader in the Financial Aid industry as it relates to Proprietary Education. We support student success by providing efficient and innovative financial aid delivery processes using the latest technology and adapting quickly to all institutional and regulatory changes. We pose a unique purpose by providing the highest quality of customer service to our students, their families and the greater community.

Mission:

The mission of the Financial Aid Office is to increase opportunities for success in higher education by helping students and their families seek, obtain, and make the best use of all financial aid resources. The Financial Aid Department strives to provide the highest quality service to students and families among each campus by taking an innovative approach to ensure the processing, and communication, with students is impeccable. Our primary objective is to assist students and families in preparation for meeting the educational costs associated with attending Pennco Tech. In doing so, the Financial Aid Office provides one-on-one confidential counseling to students and families. This is to ensure their understanding of the financial aid awarding process, how those awards relate to the student's program and to resolve any potential concerns or issues associated with financing an education.

The Financial Aid Office's purpose is to provide a customer friendly atmosphere as we make the effort to attain the goal of providing a stress-free financial aid experience for all. We focus on establishing aid eligibility, awarding scholarships, grants, loans, veteran's education benefits and third-party contracts. We seek to create a culture of care and understanding for the student, and their families, to ensure proper guidance at the beginning of the financial aid process, during and thereafter. The Financial Aid staff will deliver resources that allow all students the opportunity to take the first step in beginning their career by offering an ongoing commitment to our values. Furthermore, we contribute to retention efforts by providing continuous assistance to our current students. Thus, helping the student to achieve their educational and academic activities at ease. We provide innovation, transparency, dignity, and most importantly diversity to the students, their families and the greater community.

2.1 Commitment and Core Values:

As a part of the Financial Aid Department's on-going commitment with the student body, greater community and the Financial Aid Community, we have adopted a set of commitments, and values, regarding the administration of aid. By fulfilling these commitments, we respectfully educate our students regarding their rights and responsibilities to financial aid. We instill positivity, appreciation for our customers and most of all take pride in guiding our students appropriately to provide the utmost personable, yet efficient, financial aid process.

- 1) We will utilize our expert knowledge to update our technologies and streamline processes. We will effectively manage financial aid resources as to benefit the student and to also remain compliant with Federal and State mandates. We will work with each department within the Pennco Tech community to assist students from the enrollment process through graduation.
- 2) We understand that the student is our customer and we want to ensure that our customers know, and feel, that they are the most important people in our business. We will provide our students the most courteous attention we can give them, as they are the lifeblood to the Pennco Tech community.
- 3) Stimulate and promote valuable work experiences beneficial to the student, institution and the community. The Financial Aid Department is committed to ensuring all staff is trained, up to date, and always remains professional when interacting with students, parents, other staff members and each other. We will focus on student files as to prevent errors in processing and maintain office decorum. The Financial Aid Office is a dedicated team of professionals obligated to the service of our students and the company.
- 4) We will achieve excellence in all our services by building strong, positive relationships with individuals and organizations inside and outside of Pennco Tech. We believe that it is our team-oriented staff, honoring the values and morale, which will assure the achievement of our vision.

2.2 Statement of Purpose

The purpose of this document is to record policies and procedures surrounding the delivery of financial aid at Pennco Tech. If no policy or procedure addresses a given issue, the FAO staff is expected to use professional judgment based upon the intent of all Financial Aid programs and office practices using all available resources, such as the Federal Student Aid Handbook and the Code of Federal Regulations (CFR) to implement policy as appropriate.

This Manual:

- Provides Financial Aid staff with current policies and procedures that pertains to eligibility assessment for federal aid programs.
- Provides each staff member with general and specific responsibilities of the total staff, their individual responsibilities, and the Office's relationship to other departments/divisions of the institute.
- Provides each staff member with general office procedures so that a systematic and consistent approach may be taken in the operation of all programs; ensuring that similar operations will be handled in a uniform manner.
- Provides a quick reference to various practices and facilitates the orientation and training of personnel when changes occur.

2.3 Philosophy of the Financial Aid Office

The FAO will help students to seek, to obtain, and to make the best use of all available resources to help them finance the costs of attending Pennco Tech. The FAO will provide students with an awareness of finances during school and after graduation. We will provide quality customer service to students, parents, financial institutions and departments. The FAO will offer one-on-one counseling, orientation presentations, workshops and seminars to foster debt management and enhance financial knowledge. The Financial Aid office will work with our Student Loan Counseling Department team to ensure all students are educated on their student loan debt burden and repayment options.

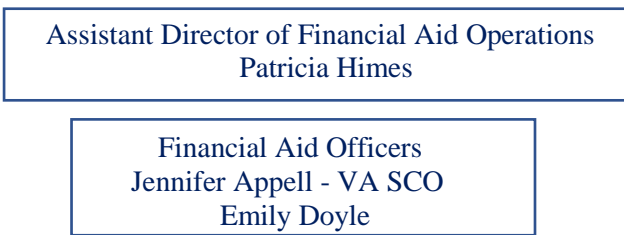
The FAO will follow internal, state, and federal guidelines to ensure equity, consistency, and regulatory compliance in the delivery of funds to students. We will maintain accurate records on all financial aid recipients processed in our office.

3.0 Administrative Organization and Office Management

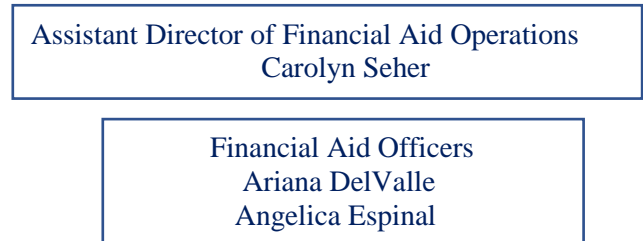
The Financial Aid office employs nine (9) fulltime employees between its Bristol and Blackwood Campuses, one (1) Executive Director of Financial Aid, one (1) Title IV Disbursement & Reconciliation Officer, one (1) Assistant Director, six (6) Financial Aid Administrators.



BRISTOL, PA CAMPUS



BLACKWOOD, NJ CAMPUS



The Financial Aid office is responsible for administering and disbursing Pell Grant Funds, FSEOG, Perkins Loans, Direct Loans, Plus Loans and Alternative Loans, Veteran’s Education Benefits, scholarships and third-party funding sources.

High School Merit Scholarships are also administered through the Financial Aid office. Any Federal grant aid that the student is eligible for will be applied first. Once the grant is applied, Pennco Tech’s scholarship will assist in filling any remaining unmet financial need regarding tuition, books and tools.

If the scholarship recipient is not eligible to be awarded any grants as determined by the FAFSA, the Pennco Tech scholarship will only cover the cost of tuition for the program. Students without grant funding will be responsible for paying for their books and/or tools. The scholarship is contingent on maintaining Satisfactory Academic Progress. Should a student withdraw for any reason the scholarship will be revoked.

The Financial Aid office is also responsible for determining Student Payment Plans. Students that have remaining balances due to lack of funding for the academic year, will be responsible for the remaining balance. Payment plans are due monthly for a maximum of 12 months. While the Financial Aid office is responsible for determining the amount of the Student Payment Plan; all payments, cash handling and collections are strictly processed at Pennco Tech's Bursar office.

The Bursar Office is responsible for the following: disbursement of title IV funding, maintaining accurate tuition charges, books and tools charges, adjustments to accounts, student tuition refunds, collecting payments for student accounts, posting funds to students accounts, processing stipend checks (credit balance), referring any student receivables to the appropriate collections department, managing credit balances and reporting any outside scholarships received to the FAO.

3.1 General Financial Aid Office Hours and Locations

Pennco Tech
3815 Otter Street
Bristol, P.A. 19007
Phone: (800) 575-9399 or (215) 785-0111
FAX: (215) 785-1945

Pennco Tech
99 Erial Road
Blackwood, N.J. 08012
Phone: (888)863-8800 or (856) 232-0310
FAX: (856) 232-2032

Office Hours: Blackwood/Bristol

The FAO is open and available to service students from 7:30 a.m. to 8:30 p.m., Monday, Wednesday and Thursday. 7:30 a.m. to 4:00 p.m. on Tuesday and 7:30 a.m. to 3:00 p.m. Friday.

4.0 Coronavirus Disease 2019 (COVID-19) Updates and Information

Throughout this policy you will see sections written in red to update the student on certain flexibilities that are to be allotted due to the Coronavirus Pandemic. There will also be a section in regards to the CARES Act that will bring

COVID information:

<https://www.penncotech.edu/covid-19/> as well as <https://www.penncotech.edu/financial-aid-new/> on our website.

5.0 Confidentiality and Privacy of Financial Aid Information

FERPA (FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT OF 1974)

Under FERPA (also called the Buckley Amendment) educational privacy and access rights accrue to the student when he/she turns 18 or enrolls in a post-secondary institution. Pennco Tech is a post-secondary institution. FERPA controls the institutions ability to disclose student information.

Under institutional policy, applicants are extended the same privacy rights to their financial aid information as enrolled students. Applicants, students and parents are governed by the following institutional financial aid privacy policies. The financial aid staff is permitted to and will discuss and otherwise disclose a student's financial aid information to the following parties:

1. The student
2. The student's parent(s) whose information appears on the FAFSA;
3. Other institution officials having a legitimate educational reason to know the student's financial aid information (i.e. Bursar Office staff managing the student's account)

4. External agencies and organizations such as guarantors, lenders, and auditors that have a legitimate reason to know the student's financial aid information (i.e. staff such as agencies authorized to process loans and grants for the student)
5. External federal agencies granted such right under FERPA.

Under FERPA, institutions are required to disclose a student's information (sometimes without notification to the student) in response to commands from the courts (typically subpoenas) and demands from specific federal agencies. The Office of Financial Aid must and will comply with all lawfully issued demand for information from the entities identified in the FERPA regulations and will (or will not) notify the student as required.

Student and Parent signatures on the FAFSA and other financial aid documents (i.e. loan applications) authorize the release of their information to certain federal and state agencies. Depending upon the scope of the information requested by the student or other authorized parties, the Office of Financial Aid may require time to present the records requested. When the information requested cannot be produced immediately, the Office of Financial Aid may require such time as is permitted under FERPA regulations to retrieve and present the requested records. Under FERPA institutions have forty five (45) days from the date the school received the request for information. Pennco Tech will extend every measure possible to issue information before the maximum number of days however, situations may arise when the ability to provide those measures are not possible.

The Financial Aid staff is not permitted to discuss or otherwise disclose a student's financial aid information to others, including but not limited to:

1. The student's parent(s) or stepparent(s) whose information does not appear on the FAFSA (the non-filing parent) without written permission from the student and the filing parent;
2. The student's parent(s) or stepparent(s) whose information does appear on the FAFSA when the parents have separated or divorced and the other parent has been identified as the custodial parent, without written permission from the student and the custodial parent;
3. High school guidance counselors and teachers;
4. The student's spouse (even when the spouse has disclosed his/her information on the FAFSA)
5. Interested relatives, neighbors and friends

The Financial Aid staff is not permitted to discuss or otherwise disclose academic information (which includes but not limited to scholarship eligibility, financial aid eligibility, grades, grade-point average, academic standing or probationary status) to anyone (except the federal and state agencies responsible for processing the student's financial aid or having authority under FERPA to access such information) other than the student (whether or not the student is dependent, whether or not the parent pays the invoice) without the student's written authorization (authorized by the release form).

5.1 Confidentiality of Records

All records and conversations between aid applicants and/or his/her family and the FAO staff are confidential and entitled to the protection ordinarily given a counseling relationship. Pennco Tech assures the confidentiality of student educational records in accordance with Pennco Tech rules, state and federal laws including the Family Educational Rights and Privacy Act of 1974 (FERPA).

The primary intent of FERPA is to provide students access to their educational records and to limit dissemination of Personally Identifiable Information (PII) without the student's written consent.

As a rule, all currently enrolled and former students have the right to review their records to determine their content and accuracy. Parents of dependent students, as defined by the Internal Revenue Code, who give evidence of this status, have the same rights. A student who wishes to obtain access to his/her financial aid record is able to do so in the presence of a FAO employee.

Staff members are allowed to discuss information contained in files only with those Pennco Tech officials who have been deemed to have a need-to-know. All files are maintained in designated file cabinets within specific locations of Pennco Tech's office areas. All requests for information from external agencies must be accompanied by a signed Release of Confidentiality.

5.2 Disclosure Authorization

When extraordinary circumstances exist that prevent the student from accessing and understanding financial aid information, the financial aid staff will discuss normally confidential information with the individual(s) the student designates on the Release of Information Authorization form. Students may request a Release of Information Authorization from the Office of Financial Aid. Students must complete and sign the Release of Information Authorization form in the Office of Financial Aid in the presence of a financial aid staff member. Students can rescind the Release of Information Authorization form at any time. Due to the highly sensitive nature of financial aid and academic information, facsimiles, photocopies or mailed Release of Information Authorization forms will not be accepted.

Types of information released by telephone:

Only financial aid information is released to students/parents, student-authorized individuals and authorized Pennco Tech personnel. Before releasing information over the telephone, students must provide identifiers that prove their identity, such as last 4 of their social security number, mother's maiden name, date of birth or any other information the administrator deems acceptable to prove authentication of identity.

Directory and Non-Directory Information

Directory information is information contained in a student's education record that would not generally be considered harmful or an invasion of privacy if disclosed. FERPA requires each institution to define its directory items.

Non-Directory Information is information that would be considered an invasion of privacy or information that would be traceable to the student without authorization. Some examples of non-directory information include: birth date, religious affiliation, citizenship, disciplinary status, ethnicity, gender, grade point average (GPA), marital status, student I.D., grades/exam scores, test scores (e.g., SAT, GRE, etc.) and progress reports.

Pennco Tech does not release information regarding our students to any person or agency not indicated on a properly completed release form with the exception of those instances noted below.

- Another Pennco Tech employee, Representatives of Federal and State agencies and Accrediting organizations.
- Agencies that have obtained their own release indicating the student's signature authorizing Pennco Tech to release specific information.

A student must update or complete a written release form for any additional information to be released to any other person or agency. The student's release form must contain:

- Date of request
- Student's social security number
- Student's signature
- Information acceptable to be released

Active Records

The FAO maintains a master record for each student receiving financial assistance. All archived financial aid files are retained in a fireproof room. Student files that are still processing are held within a separate location until the student has graduated. Once graduated, the student's file is placed in the archived file room.

Inactive Records

Inactive files are located in the fireproof archive room.

5.3 Social Security Number Policy

In compliance with the Privacy Act of 1974 (P.L. 93-579): disclosure of applicant's Social Security Number (SSN) is required on applications for financial aid. The applicant's Social Security number will be used to identify the student's account, verify the student's identity during the period of attendance, and to ascertain that there is no improper simultaneous funding under other federal financial aid programs.

As above, applicants are required by federal law to provide their Social Security Numbers (SSN) on the FAFSA. The SSN will be used for Pennco Tech's system of student records, for compliance with federal and state reporting requirements, as well as for debt collection. Pennco Tech will not disclose the SSN to anyone outside the institution except as required by law, and will make every effort to protect the applicant's privacy.

5.4 FRAUD, FORGERY AND OTHER CRIMINAL MISCONDUCT

Students, parents, spouses, Pennco Tech staff and all others are responsible for accurately portraying information submitted on the FAFSA, and in all supporting documents to the financial aid application process. Such documents include, but are not limited to the FAFSA, verification forms, signature pages, appeal applications, correspondence, etc.

Falsification of financial aid documents is an extremely serious offense. Students and others who fraudulently complete financial aid documents will be subject to disciplinary action, which may include loss of eligibility for all financial assistance, termination from all Pennco Tech programs and referral to the U. S. Department of Education for criminal prosecution as well as the Office of Inspector General (OIG). Students identified will also be referred to the School Director for disciplinary action, which may include expulsion from Pennco Tech.

All monies paid to a student that are determined to have been the result of fraud will be immediately due to Pennco Tech. If not repaid, this debt will be referred to a collection agency for collection and legal action, and may also be referred to the U. S. Department of Education.

Debts that are referred to a collection agency are subject to fees for the costs associated with collecting the debt, including attorney fees and court costs. Students, or their paying agents, will be responsible for all collection costs and attorney fees.

When Pennco Tech has credible information that suggests that an individual has engaged in fraud or other criminal misconduct, the case will be reported to the Regional Office of the Inspector General (OIG) and, if applicable, the state or local law enforcement agencies as specified by the U.S. Department of Education under section 668.14(g) of the General Provisions Regulations. The OIG responsible for handling our Bristol and Blackwood campus investigations are noted below. Pennco Tech will refer cases of fraud to the OIG as appropriate to the offices noted below.

6.0 Office Inspector General

OIG Bristol

- OIG Hotline: (800) MIS-USED
- Email: oig.hotline@ed.gov
- Philadelphia Regional Office: 215-656-6900
- Web Address: <http://www.ed.gov/about/offices/list/oig/hotline.html>

OIG Blackwood

- OIG Hotline: (800) MIS-USED
- Email: oig.hotline@ed.gov
- Washington D.C. Regional Office: (202) 245-6918
- Web Address: <http://www.ed.gov/about/offices/list/oig/hotline.html>

Any fraud that Pennco Tech refers to the Department of Education may result in criminal prosecution. Criminal prosecution may result in a fine of up to \$20,000, imprisonment for up to five years, or both.

7.0 Financial Aid Forms

The Following is a list of Financial Aid Office forms. The processing time for most financial aid forms is two weeks. The Office of Financial Aid requires approximately two weeks from the date the document is submitted, provided the student's file is complete and ready for processing.

- ❖ Free Application for Federal Student Aid (www.fafsa.gov)
- ❖ Release of Information Authorization Form
- ❖ Non-Institutional Charges Authorization Form
- ❖ Entrance Counseling (www.studentaid.gov)
- ❖ Exit Counseling (www.studentlaid.gov)
- ❖ Direct Loan Master Promissory Note (www.studentaid.gov)
- ❖ PLUS Loan MPN (www.studentaid.gov)
- ❖ Verification Worksheets (V1, V4, V5)
- ❖ Request for an EFC Data Adjustment (PJ)
- ❖ C-Flag Resolution Form
- ❖ Dependency Override Application (PJ)
- ❖ Parent Refusal Form for a Dependent Student (PJ/Unsubsidized Loan Only)
- ❖ Selective Service Appeal Application
- ❖ Unaccompanied Homeless Youth Verification Form (PJ)
- ❖ Unusual Enrollment History Form
- ❖ Verification of Student Eligibility Checklist Form
- ❖ Authorization and Certification Statement Form
- ❖ Packaging Your Program
- ❖ Explanation of Support
- ❖ Financial Aid Loan Waiver
- ❖ Verification Notification Form
- ❖ Parent Plus Loan Borrower Form
- ❖ Veterans Rights and Responsibilities Form
- ❖ *New: Higher Education Emergency Relief Fund Form (HEERF)

7.1 Financial Aid Reference Documents

There are many resource guides that assist the FAO staff. These citations are located on the Information for Financial Aid Professionals Website (IFAP), located at www.ifap.ed.gov on the right hand column.

The documents, which are used to determine students eligibility for financial aid include current regulations published in the Federal Register, Department of Education guides (such as the Federal Student Financial Aid Handbook, Application and Verification Guide, formula books, and Audit Guide), Dear Colleague letters, Financial Aid legislation, CFR title 34 and other laws or regulations that impact Federal Student Aid.

7.2 Policy Development

The Executive Director of Financial Aid collaborates with other Financial Aid staff to establish institutional policy surrounding the delivery of financial assistance. Policy development adheres to Federal and State laws and regulations as well as to the mission of Pennco Tech.

7.3 Responsible Personnel

The FAO is responsible for ensuring others are aware of any changes to existing policies and procedures or the development of new policies and procedures. This is usually conducted during the director's meeting on Fridays at both the Bristol and Blackwood campuses and/or the Executive Directors meeting that occurs every two months with the owners. If the information must be disseminated immediately an email update may suffice or an emergency staff meeting will be conducted.

7.4 Operating Policies

The following operating policies are designed to assure that the FAO is effective in carrying out its responsibilities:

All students must apply for financial assistance by completing the Free Application for Federal Student Aid (FAFSA) using Pennco Tech's School code.

8.0 Blackwood: 014877

Bristol: 005939

All funds available at Pennco Tech for financial assistance shall be administered through the FAO. The selection of students to receive certain designated scholarships and awards shall be submitted by the responsible department to the FAO for processing. When funds or awards for students are received from outside sources by other offices or third parties, that office will be required to notify the FAO regarding those funds.

The FAO shall maintain adequate records to ensure proper administration of aid funds. This includes ensuring that aid awarded is not in excess of financial need and/or the cost of attendance and that aggregate awards do not exceed total expenditures of funds under each program.

Selection of students to receive financial aid will be made without regard to age, sex, race, color, religion, sexual orientation, national origin, disability or marital status.

All students applying for Federal Student aid are required to apply annually for federal assistance. The FAFSA is available October 1st of each year. Pennco Tech reserves appointments for each student to receive assistance in completing their Free Application for Federal Student Aid. Students are welcome to visit the office at any time to file their FAFSA. Computers are available in the Financial Aid office's waiting area.

9.0 Correspondence

The Financial Aid Administrators route general administrative correspondence to the appropriate staff member. If an appropriate recipient is not identifiable, the correspondence should be given to the Executive Director for evaluation and delegation. Where appropriate, correspondence should be responded to within one week. If a staff member is responding to a specific complaint, it is typical procedure for the staff member to have the Executive Director or Assistant Director review the correspondence. This allows the Executive Director/Assistant Director to be aware of potential problems.

Emails should be responded to immediately or within 24 hours.

9.1 Telephone

Telephone calls are answered in a friendly and professional manner (i.e. Financial Aid Office, this is “Susie”. How may I help you?). Typically, the Financial Aid Administrators receive incoming calls from the Front Desk Clerk. If an Administrator is unavailable, the call is routed to the Senior Financial Aid Manager, Assistant Director or Executive Director. Every attempt is made to return calls the same business day and no later than the next business day.

9.2 Distribution of Forms

General financial aid forms are distributed in the Financial Aid Office. All forms are located on the Financial Aid Drive. Financial Aid brochures and various other forms may be emailed and/or distributed in the Financial Aid Office.

9.3 Staff Meetings

Financial Aid Staff Trainings/Meetings are held weekly on Tuesdays in Bristol and Wednesday in Blackwood. The Executive Director has an open door policy and welcomes staff to enter and converse about policy, procedures and student files. Additional meetings may be called at the discretion of the Financial Aid Executive Director, Assistant Director or Financial Aid Manager.

10.0 Student Financial Aid Appointments

Students are required to make appointments for Financial Aid services. Appointments are conducted in two stages. The first stage is considered the *Initial Appointment*. During this appointment the Financial Aid Administrator will gather information to process the Free Application for Federal Student Aid (FAFSA). Administrators will require students and/or parents to provide financial information, demographic information and personal information to process their financial aid file. Administrators will have students complete a release form and a reference sheet for processing. Students must also complete an Authorization and Certification Statement form containing their rights and responsibilities for receiving financial aid.

The second stage is a *Follow Up* appointment. During this time Administrators should have received a processed ISIR for the student. Students are awarded and given their rights and responsibilities, award letter (budget), and Student Payment Plan if there is one (information regarding the payment plan are disclosed at signing). Students will also complete the required Entrance Counseling and MPN on www.studentloans.gov if he or she elected to receive a Federal Direct loan.

Parents will also have the opportunity to complete a Common Origination Disbursement credit check for a Parent Plus loan and sign an MPN if approved. Parents will inform the Financial Aid Administrator of the amount they wish to borrow and also sign an award letter confirming that amount. Parents must also complete the Parent Plus Loan Borrower form indicating the amount they wish to borrow and consent for Pennco Tech’s Financial Aid Office to perform a credit check to determine an accepted or declined status. If the Parent Plus credit is denied an otherwise dependent student will be eligible to borrow up to the maximum loan eligibility for the academic year under the Independent loan amount. (Please see Direct Loan section for values)

If a student has a **SAR C-code** (flag) that requires resolution, Financial Aid Administrators will explain the c-code (flag) and the appropriate documentation required to properly resolve the flag. Students will be advised that their financial aid funds cannot be approved until all c-code flags are resolved properly.

11.0 Accommodations for Disabilities

Pennco Tech complies with the Americans with Disabilities Act. To this end, Pennco Tech prohibits discrimination in the employment processes based on an applicant's or employee's disability. Pennco Tech shall provide reasonable accommodations to disabled applicants or employees unless to do so would cause an undue hardship.

12.0 Calendar of Financial Aid Activities

Each year, academic calendars are published. The calendars provide specific dates for all Pennco Tech activities, schedules for program coursework and any dates that are reserved as holidays. Please refer to the Pennco Tech catalog for a list of those activities.

13.0 Student Consumer Information

The staff in the FAO recognizes that in order to understand the complications of Financial Aid, accurate and timely dissemination of information to consumers is vital. The full list disclosing Consumer Information is located in the Pennco Tech Catalog and is available to prospective and current students. It also is available as a link on Pennco Tech's Student Portal and website.

Several policies have been implemented to ensure appropriate dissemination is achieved. Pennco Tech's Catalog is updated annually and specific to any regulatory changes. For a comprehensive review of our Consumer Information, please review our catalog located under the Consumer Information section of our website at www.penncotech.edu or request a copy from our Education Department.

14.0 Financial Aid Program Availability

Financial Aid programs that are available to students attending Pennco Tech are also listed in the catalog and in this manual. Financial aid funds may be categorized into four basic sources: federal, state, institutional and private.

14.1 Federal

Available Federal Aid Includes:

- Federal Pell Grant (PELL)
- Federal Supplemental Educational Opportunity Program (FSEOG)
- Federal Subsidized Direct Loan (SUB)
- Federal Unsubsidized Direct Loan (UNSUB)
- Federal Parent Plus Loan for Undergraduate Students (DLP)

14.2 State

Blackwood

Currently Pennco Tech Students, Blackwood Campus are ineligible for any NJHESAA state funds due to the state's determination of eligible programs.

Bristol

Pennsylvania Higher Education Assistance Agency (PHEAA) provides a number of different programs to the residents of Pennsylvania. Programs are developed to assist students in Associate's Degree programs and technical programs that lead to gainful employment in certain career fields. Pennco Tech is eligible to administer PHEAA program funds to students in many of the programs that we offer. Please see below for a list of the PHEAA programs that Pennco Tech participates in. Students must meet specific eligibility criteria for each program. For a comprehensive review of all programs offered by PHEAA and their criteria, please visit the website listed below.

www.pheaa.org

Pennsylvania State Programs

- Pennsylvania State Grant Program
- Pennsylvania Targeted Industry Program
- Ready to Succeed Scholarship Program (RTSS)
- Pennsylvania National Guard EAP
- Pennsylvania Chafee Education and Training Grant Program

15.0 Procedures and Forms Required to Apply

The procedures and forms required to apply for Financial Aid are published on the Financial Aid Drive. In addition, notices announcing deadlines and application availability are printed in the Tech Trends newsletter.

Additional documents may be requested to complete processing of the aid request. Notification of these additional required documents is articulated at the second appointment. Additional information may include, but is not limited to, the following:

- **Proof of citizenship**
- **Proof of selective service registration**
- **Marriage certificate**
- **Verification forms (Independent and Dependent)**
- **Tax Return Transcripts and/or W-2s (parent/student/spouse)**
- **Statement of non-tax filer (parent/student/ spouse)**
- **Student Aid Report (SAR)**
- **Admission status**
- **Student certifications**
- **Employment verification**
- **Verification of marital status**
- **High School Diploma**

15.1 Availability of Forms and Instructions

Availability of forms and instructions is listed on the aforementioned documents and on specific aid applications (i.e. loan applications for Federal Direct Loan).

15.2 Methods of Disseminating Consumer Information

The primary methods of disseminating consumer information to Pennco Tech students is through the Admissions Department and given at the time of enrollment. The Education Department also updates all students annually in regards to Consumer information. This dissemination may be provided by hard copy documents or specific links to a website location regarding the information to be reviewed.

The Pennco Tech Student Portal also provides links to Consumer Information for our Blackwood and Bristol Campuses.

16.0 Student Eligibility Requirements

Student eligibility requirements are listed in Pennco Tech's School Catalog and on specific aid applications (i.e. loan applications for Federal Direct Loan, FAFSA and Admissions Applications).

16.1 General Student Eligibility for Federal Title IV Financial Aid

There are several eligibility requirements which a student must meet in order to be considered for federal funds. Students must:

- Be enrolled as a regular student in an eligible program, cannot also be enrolled in elementary or secondary school.
- Demonstrate financial need according to Federal Methodology.
- Have a high school diploma, a GED, or have passed a test approved by the Department of Education.
- Be enrolled in a degree seeking or eligible certificate program.
- Be a U.S. Citizen or eligible non-citizen.
- Sign receipt of the School Catalog or view the link on Pennco Tech's Portal which discloses Pennco Tech's Consumer Information and Disclosures.
- Make Satisfactory Academic Progress as determined by the institution.

17.0 Criteria for Selecting Recipients and Determining Award Amounts.

Available funds are awarded based on specific aid programs, eligibility criteria and a student's need. Additional information concerning criteria and selection is listed in this section.

18.0 Rights and Responsibilities of Students receiving Financial Aid

As a recipient of financial aid, there are certain rights and responsibilities students should be aware of. These rights and responsibilities of students receiving financial aid are available and distributed to students during their follow up appointment. Students are also welcome to receive this information at any given time before, during and after their enrollment at Pennco Tech.

Students have the right to know:

Financial Aid programs available at Pennco Tech; application processes which must be followed to be considered for aid; criteria used to select recipients and calculate need; Pennco Tech refund and repayment policy; FAO policies surrounding Satisfactory Academic Progress; and Special facilities and services available for the handicapped.

Students are responsible for:

Completing all forms accurately and by the published deadlines; submitting information requested by FAO staff in a timely manner; keeping the FAO informed of any changes in address, name, marital status, financial situation, or any change in student status; reporting to the FAO any additional assistance from outside sources such as scholarships and educational benefits; notifying the FAO of a change in enrollment status; maintaining Satisfactory Academic Progress; and re-applying for aid each year.

19.0 Cost of Attendance

A description of the tuition for attendance is published in the student's Enrollment Agreement and signed during the Admissions process. An estimated budget for the total cost of attendance is published in the Financial Aid office's database and provided to students along with their award letter during their follow up appointment. The Cost of Attendance is comprised of tuition, transportation, miscellaneous items, personal, books, tools and supplies. The Financial Aid Office uses a list of collected information to determine reasonable cost for personal items, room and board, miscellaneous items and transportation. The information gathered to make decisions regarding the Financial Aid Office's cost of attendance is researched based on the Consumer Price Index, The Bureau of Labor statistics, the cost of rent for modest apartments and surveys conducted through the student population body (which will be individually identified

when used for specific components). Separate costs are used for each program offered at Pennco Tech reflecting the appropriate tuition, books and supplies required for each program.

19.1 Tuition and Fees

HEA Sec. 472(1).

Pennco Tech uses actual tuition amounts for each program as outlined in the student's Enrollment Agreement.

19.2 Miscellaneous Personal Expenses

HEA Sec. 472(2).

The allowance for miscellaneous expenses is intended to allow students a reasonable standard of living. The allowance may include clothing, recreation and personal care expenses.

19.3 Loan Fees

HEA Sec. 472(12).

For students or parent(s) borrowing through the Federal Direct Loan Program, schools must include in the COA any fees deducted from loan proceeds. The law requires a loan fee be charged on all Direct loans to help offset the cost of providing loan funds. Fees are deducted from the loan proceeds before disbursement. Pennco Tech uses the actual cost of the loan fees in determining the COA.

19.4 Transportation Expenses

HEA Sec. 472(2).

The transportation component of the COA includes the cost of a students' travel as it relates to attending school. The transportation figure is based on the cost of transportation to and from school. The transportation component of the budget is constructed based on the average number of miles traveled monthly multiplied by the federal mileage reimbursement rate multiplied by the number of months the student will be enrolled. Federal regulations prohibit including in student budgets the direct expense to purchase and maintain an automobile.

19.5 Room and Board

HEA Sec. 472(3).

Room and Board expenses are based on a survey of rent for one-bedroom apartments in the Pennco Tech-Blackwood NJ/Bristol, PA area and the national College Board estimated cost. The amounts established determine the allotment for students with parents and on or off campus. Our Bristol, PA location has a limited number of dorms available for students attending that campus. Room and Board costs for living on campus are specific to the amount the institution charges each student per his/her dorm contract.

***Very Important**

**Students living in military housing or receiving a Basic Housing Allowance cannot have room expenses included in their budgets. Board expenses, however, may remain. If Pennco Tech is privy to information concluding that a student is living in military housing or receiving a BAH the room portion in the student's COA will be removed.*

19.6 Books and Supplies

HEA Sec. 472(2).

The books and supplies allowance is adequate to cover the cost of required materials for the student's coursework. Books and Supplies are available at Pennco Tech's Bursar office. Pennco Tech purchases books and/or supplies from its distributor. Students are packaged for their books, supplies and tools at direct cost, if the student wishes to purchase books and supplies from Pennco Tech. Students are able to purchase their supplies alternatively should they wish to do so.

20.0 Special Provisions for Books and Supplies (Title IV eligible recipients)

34 CFR 668.164(i)

In order to academically succeed in a program, a student must be able to purchase books and supplies at the beginning of the academic period. Students have the ability to purchase books directly at the Bursar or opt out and receive payment for books and supplies to be purchased alternatively by the 7th day of the payment period. Student account charges are reflected as a stipend for books and supplies (if opting out).

If a student opts to purchase books directly from Pennco Tech's Bursar each book and/or supplies charge will be itemized per the purchase on the student's ledger. *(In order for a student to be eligible to receive a disbursement for books and supplies, a student must meet all the student eligibility requirements before the start of the student's payment period. A student, who has not completed the verification process, has an unresolved c-code or has unresolved conflicting information **IS NOT** covered by this special provision for books and supplies if those issues have not been resolved at least 10 days before the start of the student's payment period. Students who are Direct loan borrowers and are subject to the 30-day delayed (new borrower) disbursement provision will not have their loans considered in the calculation of whether or not a credit balance exist 10 days before the start of the student's payment period.)*

21.0 Institutional Refund Policy

A detailed description of the refund policy is included in Pennco Tech's Business Office Policies and Procedures manual. Students may also view Pennco Tech's refund policy on our website and student portal.

22.0 Academic Programs Offered

A description of the academic programs offered at Pennco Tech is listed in the Pennco Tech Catalog. Additional information may be obtained from the Education Department.

23.0 Persons Designated to Provide Financial Aid Information.

Only information published, provided, or referred by FAO staff is valid. Any additional information should be verified with staff from the FAO.

24.0 Student Retention and Completion Data

Student retention and completion data is gathered by the Academic Processor at each campus. This information is also located on the Pennco Tech website and distributed weekly through our population report.

25.0 Information for Students with Disabilities

Information concerning students with disabilities is listed in the Pennco Tech Catalog and available at our Education Department.

26.0 Information on Accreditation

Information concerning accreditation is listed in the Pennco Tech Catalog. Additional information may be obtained from the Office of Education.

27.0 Systems Operations

The FAO uses CampusNexus to automate processing aid application as much as possible. Federal eligibility information is received electronically from the Department of Education using EDConnect and Electronic Data Exchange (EDE). The data is loaded into CampusNexus the data arrives.

28.0 Packaging

28.1 Award Letter Processing

Processes have been established in CampusNexus to automatically generate an award letter following the packaging and budget generation process. The award letter is generated at that time of the follow up appointment and signed in the Financial Aid Office with an Administrator. One copy is given to the student the original is retained in the student's file. Students may also scan, fax or email a copy of their signed award letter to the Financial Aid Office.

28.2 Loan Processing

The Financial Aid office processes all federal loan programs. Federal Direct loans are processed via CampusNexus and sent directly to COD for processing. Any alternative loan processing will follow the protocol of the specific lender.

29.0 Department of Education Software Installation and Upgrades

The FAO at Pennco Tech uses the Department of Education recommended software to import ISIRS and to send and receive origination and disbursement records. The software is EdConnect. Upgrades to the software are often necessary and a yearly installation of new software is also necessary. The Director of IT is responsible for software upgrade installations and programming in CampusNexus.

30.0 Institutional Student Information Record (ISIR)

The ISIR is the school's electronic version of the Student Aid Report which is generated only after a student completes a FAFSA. ISIRS are downloaded using EdConnect and loaded into CampusNexus. The electronic ISIR file is then used in packaging and awarding financial aid. The student's needs analysis is then calculated using data elements on the ISIR and directly computed from the Cost of Attendance components in the CampusNexus system.

31.0 FAFSA Changes – “Whats New”

***NEW for 2020-2021**

****New: IRS Tax Form Changes***

Starting with the 2018 tax filing year, the IRS has eliminated tax forms 1040A and 1040EZ. These forms will no longer be available to taxpayers when filing their tax returns. Due to the IRS tax form changes, it has caused several questions on the FAFSA to be adjusted and/or deleted which will be highlighted and updated in this policy. It has also caused the verifiable line items to change with the new layout of the 1040.

****New for 2020-2021 – All Questions Starting with Number 38 were revised***

****Revised Responses for Tax Return Filed Question:***

With the IRS' rescinding tax form(s) 1040A and 1040EZ, the Department of Education changed the responses to questions thirty three (33) and previously eighty one (81) by removing the answer choices of filing an IRS 1040A and 1040EZ.

The new presented answers on the FAFSA are now:

- *IRS 1040*
- *Foreign tax return, IRS 1040NR, or IRS 1040NR-EZ*

- *A tax return with Puerto Rico, a U.S. territory or Freely Associated State*

****Revised Responses for Question ‘Are you eligible to file a 1040A or 1040EZ’***

Questions thirty five (35) and previously eighty three (83) have been revised to reflect the tax changes. The previous language asked if the student and/or parent were eligible to file a 1040A or 1040EZ.

The new questions display as follows:

“Did (or will) you file a Schedule 1 with your 2018 tax return? Answer “No” if you did not file a Schedule 1 or only filed a Schedule 1 to report an Alaska Permanent Fund dividend or one of the other exceptions listed in the Notes on page 9.”

Responses are as follows:

- *Yes*
- *No*
- *Don’t Know*

If the student is selected for verification, and this question has been answered incorrectly, the FAO is **NOT** required to verify this answer and make any changes to the FAFSA for question 35 or 82.

Schedule 1 is filed if the below applies to the tax payer:

Filed if tax filer has income beyond:

- *Wages, salaries, tips, etc.*
- *Interest and dividend income*
- *IRA, pension, and annuity distributions (withdrawals)*
- *Social Security benefits*

Filed if tax filer has additional income such as:

- *Business and farm income*
- *Unemployment income*

Filed to claim deductions such as:

- *IRA deductions*
- *Payments to SEP, SIMPLE, Keogh, and other*
- *qualified plans*

Schedule 2

Filed if box on line 11b on 1040 is checked and tax filer has Excess advance premium tax credit repayment.

Schedule 3

Filed if box on line 12a on 1040 is checked and tax filer has Education Credits.

Questions 38 and 87, in regards to student/parent exemptions were removed.

Questions 45.f and 94.f were combined with questions 44.e and 94.e in regards to student and parent(s) untaxed portion of IRA distributions and pensions.

The Department has revised the numeric value in that the ‘Yes’ and ‘No’ answers were switched. Previously Yes = 1 and No = 2. The adjustment reads below:

Yes = 2

No = 1

Don’t Know = 3

(Prior Prior Year Income continued for 20-21)

The 2020-2021 FAFSA Prior Prior Year Income information is for the 2018 Income Tax Year. Prior Prior Year refers to a policy enabling students and families to file the Free Application for Federal Student Aid (FAFSA) using tax information from two years ago.

FAFSA on the Web Homepage links to the college score board allowing students to retrieve information on Average Annual Costs, Graduation Rates and Salaries after attending the institution.

The Department updated the “Federal Needs Analysis Methodology” to determine a student’s need and Expected Family Contribution. Medicaid and/or Supplemental Security Income (SSI) were added to the list of Means-Tested Benefits (federal programs) used as criteria for the Simplified Needs Test. Clarified questions for business and/or investments net worth, college grade level and reduced priced lunches. –Continued for 2020-2021

The Federal Needs Analysis Methodology that determines a student’s expected family contribution has been updated to reflect any changes due to inflation. The values to the Income Protection Allowance calculation have been updated.

In FAFSA on the web, the Department changed the title of the Homeless Circumstances page to “Homeless or at Risk of Being Homeless,” and modified the order and wording of the responses.- continued for 2020-2021

In FAFSA on the web, the question “Are you a foster youth or were you at any time in the foster care system?” If a student answers yes to the question comment code 166 will appear on the ISIR. If a student answers yes, it is possible that the student could be eligible for Chafee Foster Care Independence Program funds or the Education and Training Voucher (ETV) Program funds. (Continued for 2020-2021)

Marital Status Changes due to the Defense of Marriage Act Changes (continued for 2020-2021)

On June 26, 2013 the Supreme Court struck down the section of the Defense of Marriage Act (DOMA) that provided that for purposes of federal programs, a marriage can only be between one man and one woman. Consistent with this decision, same-sex couples must report their marital status as married if they were legally married in a state or other jurisdiction (foreign country) that permits same-sex marriage.

The Department has revised the FAFSA and FAFSA on the Web to provide additional guidance to applicants who are same-sex married couples or have same-sex married parents. For further information about the DOMA changes and the implications for Title IV student financial assistance programs, see [Dear Colleague Letter GEN-13-25](#). (Continued for 2019-2020)

Parental Information Changes (continued for 2020-2021)

On April 29, 2013, The Department posted [Dear Colleague Letter GEN-13-12](#), which alerted Financial Aid Administrators to changes related to the collection of parental information. As described in this letter, beginning with the 2014-2015 FAFSA, dependent students are required to include income and other information from their legal parents (biological and/or adoptive) if those parents live together, regardless of the parents’ marital status or gender.

Revised Responses for Parents’ Marital Status Question (continued for 2020-2021)

The Department changed the “Single” response for the parents’ marital status question to “Never Married” and added a new response labeled “Unmarried and both parents living together.” The parents’ marital status question responses are now reordered and displayed on the FAFSA as follows:

- Never married
- Unmarried and both legal parents living together
- Married or remarried
- Divorced or separated
- Widowed

Revised Labels for Parent Questions (continued for 2020-2021)

Gender-neutral labels are used when referencing a specific parent and are reflected on the paper FAFSA and throughout our application processing systems, including the CPS, FAFSA on the Web, FAA Access, and applicant communications (SAR, SAR Acknowledgement, eSAR, and ISIR). For example, fields previously labeled as “father/stepfather” are now labeled as “Parent 1 (father/mother)” or “Parent 1 (father/mother/stepparent)” and fields previously labeled as “mother/stepmother” are now labeled “Parent 2 (father/mother)” or “Parent 2 (father/mother/stepparent).” These changes are also documented in guides and technical references (such as the *ISIR Guide* and *EDE Technical Reference*).

FAA ACCESS TO CPS ONLINE FUNCTION

Identity Verification Results Functionality to FAA Access

In the 2016-2017 FAFSA year, the Department added an Identity Verification Results feature to FAA Access, enabling Administrators to provide the required verification results for students selected for identity and high school completion status. *For the 2017-2018 FAFSA award year, the Department added a new value of six (6) to the identity verification results tool stating “Verification attempted, issues found with both identity and HS completion.” For 2019-2020 this requirement remains the same.*

These are the applicants selected for Verification Tracking Groups V4 and V5.

**New for 2020-2021*

Due to the IRS tax form changes, several questions have been revised on FAA Access Application Processing as well. The type of 2018 tax form used will no longer display ‘2’, option ‘2’ gave the choice – IRS 1040A or 1040EZ. The available options are as follows:

- 1 = 1 – IRS 1040
- 3 = 3 – Foreign Tax Return
- 4 = 4 – A tax return for a U.S. territory or a freely associated state

All other references involving the forms 1040A or 1040EZ have been removed.

32.0 Verification 668.51–61

Verification Regulations 34 CFR

Verification is the process of confirming the accuracy of student reported data on the Free Application for Federal Student Aid. For any academic year, the office of student financial aid verifies 100% of CPS-selected verifications. Verification is a review, mandated by law, conducted by the financial aid staff wherein the applicant’s FAFSA is compared to external documents, such as the federal income tax return transcript, in order to substantiate the FAFSA data. Students, parents and spouses are reminded that by signing the FAFSA and certain other financial aid documents, they are agreeing, if asked, to provide information that will verify the accuracy of their completed forms. The student is ineligible for financial aid if the student, parent(s), or spouse refuses to submit verification documents as requested.

32.1 Selection of Applications to be Verified

The FAO verifies those applicants identified by the Department of Education (ED). In addition, aid administrators may select a student for verification if there is a discrepancy or a condition that is unusual and warrants investigation. If the FAFSA reflects significant numerical improbabilities (such as a tax liability number that is equal to, or that exceeds, the adjusted gross income) the applicant may be non-randomly selected for verification in order that the financial aid staff can correct the apparent discrepancy. The Financial Aid Office staff is required, by federal regulation, to resolve any discrepancies that are created by information submitted at any point that conflicts with that already in a student's file. Resolution of discrepancies may result in revision to a student's aid amounts and/or types. Depending upon the nature of the discrepancy, the financial aid staff may be required to correct a student's financial aid awards for a past year(s), whereupon Pennco Tech will bill the student for previously disbursed aid.

Students flagged for verification by the Central Processor and flagged in a verification tracking group can possibly move from one verification group to another depending on the flag. The Central Processor may move applicants from previously assigned Verification Tracking Groups V1, or V4 to Verification Tracking Group V5 based on corrections made to the applicant's record or other information available from Federal Student Aid. (Continued for 2020-2021)

Verification Selection Change value of C (change in Verification Tracking Group) is present (on the ISIR) to notify institutions that the Verification Tracking Group has changed to a different verification tracking group on a subsequent transaction. (Continued for 2020-2021)

CPS System-Generated Transactions: Beginning with the 2016-2017 processing cycle, the CPS may generate new transactions for records meeting suspect identity or fraud patterns. A new Transaction Source/Type, 5Y (Identity Verification), is now assigned to the transaction when the CPS finds a previously processed record subsequently meets the criteria for suspect identity or fraud patterns. This information is documented several places but more specifically on the ISIR compare pages. (no indication if this has been continued for 2020-2021)

Depending on the criteria the transaction meets, a 5Y transaction will either have a "Reject 23" set, or it will be selected for verification and placed in the V4 or V5 verification group. In the case that the student is flagged with a 5Y transaction and verification, administrators must verify the student as it pertains to the normal process regarding the aforementioned verification groups (V4 or V5). If the student is flagged for a "Reject 23" the student's ISIR will have comment code 281, which informs the student that his/her FAFSA cannot be processed because of issues related to the student's eligibility. It also directs the student to contact FSA at 202-377-4074 for assistance within 30 days so that FSA can determine if the hold on the student's eligibility can be removed. **Please see 2018-2019 ISIR Guide for clarification if necessary**

32.2 Verification Exclusions

There are times when you do not need to verify a student's application. **Except in the case of the student's death, however, none of the exemptions excuse you from the requirement to resolve conflicting information.** Administrators must identify and document in the aid folder why the student is not required to complete verification. Other information not excluded must still be verified according to all other requirements. You do not have to verify FAFSA information of a student in the following situations:

- An applicant who died during the award year
- A dependent student whose parents cannot comply because of specified reasons (i.e., parents are deceased, are physically or mentally incapacitated, or parents are residing in another country and cannot be contacted by normal means, or cannot be located because the student does not have and cannot get their contact information)
- Students who are only eligible for an unsubsidized loan (Requesting to receive an unsubsidized loan in lieu of need based aid to prevent the verification process is not possible)

- A spouse of an independent student if the spouse has died, is mentally incapacitated, is residing in another country and cannot be contacted by normal means, or cannot be located because the student does not have and cannot get his/her contact information)
- Pennco Tech will not accept verifications performed at another institution. Therefore if a student is selected for verification, that student must supply all necessary verification documents before receiving any title IV funds.
- A student who does not receive Title IV funds
- Post Enrollment: Student was selected for verification after ceasing to be enrolled and all disbursements were made.

32.3 Verification Time Frame

Pennco Tech reserves in-person appointments for every financial aid recipient. During this appointment, applicants selected for verification are informed of the necessary documents and processes for completing their verification. Administrators print a letter that informs the student he/she is selected for the verification process, defines what verification is and informs the student of the additional information required to complete his/her financial aid file. If the FAO has received ED information identifying the student as selected for verification, the letter requests the appropriate verification documents (i.e. verification worksheets, student and parent tax returns).

Students are notified that until the missing items are submitted to the FAO, their awards are estimated and can change during the verification process. If a student's Estimated Family Contribution changes as a result of the verification process, Pennco Tech will make the necessary adjustments to their awards and inform the student as appropriate. If a student submits documentation that appears fraudulent, the FAO staff member must notify the Assistant Director of Financial Aid.

32.4 Documentation

Documentation submitted to the FAO must be legible, appropriate, and have the student's Pennco Tech ID number or social security number for identification purposes. If the student submits a document which is not legible (i.e. a copy of a tax return transcript in which the income numbers are not identifiable), appropriate (a tax return transcript is requested and the student submits a W-2), or identifiable (student submits a copy of the step-parents tax return and the last name does not match the student's and there is no link to the student by identifiers) the documents will be returned and a request for additional documentation is requested. If possible, the return of documentation is recorded on the student's account in the comment section of the academic year screen.

Verification worksheets have been constructed to assist students and parents with the collection of verification data. All verification worksheets must be clearly identifiable and signed at the time of verification. Students are warned that any false or misleading information could result in fine and punishment.

Students and parents are encouraged to use the IRS Data Retrieval Tool embedded within the FAFSA application. Using the Data Retrieval Tool is the fastest, easiest and most secure method of meeting the verification requirements. However, if a student or parent is unable or declines to use The DRT, an acceptable copy of tax information is mandatory to continue the verification process.

If a student or parent has filed an amended tax return an Aid Administrator will need a signed copy of the IRS form 1040X that was filed, a Tax Return Transcript (which does not have to be signed), or any IRS transcript (such as a return transcript for taxpayer or RTFTP) that includes all the original income and tax information required to be verified, i.e. AGI, income, tax paid, education credits, etc.

32.5 *New for 2020-2021*** – When completing the verification process, and the student and/or parent does not have a data request flag of ‘02’, the Financial Aid department must request a copy of the students and/or parents tax returns. The IRS has reserved 1040A and 1040EZ, if the 1040 is requested; they must contain the appropriate schedules that correspond with that return. Schedule 1, 2 or 3. If the student and/or parent has business or farm income, a schedule ‘C’ or ‘F’ will no longer be required to verify the income.

A signed copy of the tax return can be accepted by the financial aid department in lieu of the tax transcripts. The financial aid department does not need to first request the tax transcripts, the institution can accept a ‘wet’ (handwritten) copy of the 1040 signed by the student, and/or parent or the tax preparer, but all 1040s must include the appropriate schedules. If signed by the tax preparer, it must be stamped, typed or printed with the name and address of the preparer.

*****New for 2020-2021*** –The IRS has added a new function, the Income Verification Express Service, ‘IVES’. It allows the institution to submit a request via the IVES, the process is initiated with the submission of the 4506-T, schools cannot require the student and/or parent to use the IVES. There is a two (2) dollar charged with each request, the charge is to be assumed by the institution.

32.6 Filers of amended returns (continued for 2020-2021).

Students or parents who file an amended return (IRS Form 1040X) can, beginning with the 2018–2019 year, use the IRS DRT, though the ISIR will show an IRS Request Flag value of 07 (see page 15 of The 2018-2019 Application and Verification guide for total reference of this function), and because the tax return transcript does not reflect changes to the original return by the filer or the IRS, it is by itself not sufficient. Instead to complete verification you will need a signed copy of the 1040X form that was filed as well as either

- IRS DRT information on an ISIR record with all the information from the original tax return or
- An IRS tax return transcript (which does not have to be signed) or any other IRS transcript that includes all the income and tax information required to be verified.

When the ISIR shows an IRS Request Flag value of 06 or 07, schools will need to contact the student or parent. A value of 06 indicates that after the DRT was used and the FAFSA was submitted, the student or parent changed an item on the FAFSA (e.g., the date of marriage) that would have made the person ineligible to use the DRT.

The school must contact the student or parent to determine if all of the transferred data was correct or if it needs to be corrected. A value of 07, which was new for 2018–2019, is an indication from the IRS that the student or parent used the DRT but also has filed an amended tax return for the relevant year. Because the data that was transferred will be from the original return and not the amended one, the school must contact the student or parent and make any applicable corrections to FAFSA items, regardless of whether the application was selected for verification. (continued for 2020-2021)

*****New for 2020-2021*** – In the event there is a Data Request Flag of ‘07’, as in previous years, the financial aid department is required to have the student and/or parent(s) make the corrections to reflect the 1040X. Now, the FAO must request documentation. The FAO can make the decision to accept the documents they choose, such as a written statement from the student and/or parent explaining the changes and why. If the subsequent ISIR received is selected for verification, the FAO will then have to complete the full verification process and request the original tax transcripts (or signed 1040s) along with the 1040X.

High School Completion requirement can be satisfied with a high school diploma or transcript, GED certificate or transcript, transcript showing 2-year program completion, or home school credential or transcript.

Identity/Statement of Educational Purpose can be satisfied with an original unexpired government- issued ID and signed statement of educational purpose or a copy of that ID and the statement notarized. Since the Pennco Tech Financial Aid office reserves in-person appointments, it is encouraged that all students with this requirement submit the necessary documents at the time of their appointment. The Financial Aid Administrator is responsible for documenting their name and date the document was received and processed. ***Once received the Administrator is responsible for updating FAA Access to CPS online Identity Verification Results using the Identity Verification Results feature.***

If a parent, student, or spouse has filed a tax extension (Form 4868 Application for Automatic Extension of Time to File U.S. Individual Income Tax Return) with the IRS, verification can be completed provided that the person submits all income information that will be used to file the necessary tax return. A copy of the IRS's approval for the extension beyond the automatic six-month extension (if applicable), verification of Non-filing letter from the IRS, a copy of w-2's, or if they are self-employed, a signed statement with the amount of their AGI and their U.S. taxes paid.

***Changes from 2018-2019 (Continued for 2020-2021)**

Filing extensions

With the change to prior-year tax data, even those who received a tax filing extension will be able to use information from a completed tax return by the time verification is required. Therefore, only students and parents granted an extension beyond the automatic six-month extension may submit the following for verification:

- *An unexpired copy of the IRS's approval (form 2350) of an extension beyond the automatic six-month extension for tax year 2018;*
- *Verification of Non-filing Letter (confirmation that the tax return has not yet been filed) from the IRS or other relevant tax authority dated on or after October 1, 2019;*
- *A copy of IRS Form W-2 for each source of employment income received or an equivalent document for tax year 2018 and,*
- *If self-employed, a signed statement certifying the amount of the individual's Adjusted Gross Income (AGI) and the U.S. income tax paid for tax year 2018.*

Administrators may require those with a filing extension to use the DRT or submit to your school a tax transcript after the return has been filed. If Administrators choose this option, you must re-verify the income information. Pennco Tech will only require a student and/or parent or spouse to provide additional tax information when a conflict exists.

***New for 2020-2021**

A copy of **IRS Form 4868**, Application for Automatic Extension of Time to File U.S. Individual Income Tax Return, is **NO** longer required to complete the verification process. Students and/or parent(s) may submit the following documentation for proof of the extension beyond six months:

- IRS form 2350, if indicates extension was approved
 - IRS record of Account Transcript or any IRS Transcript if it:
 - Is dated after automatic six month extension ends October 15th, 2019
 - Indicates extension request was filed with IRS (appearance of extension on a tax transcript assumes it was approved)

32.7 Non- Tax Filers

For Non-Tax Filers, Aid Administrators must receive a W-2 form for each source of employment income. The student must supply a signed statement listing the sources and amounts of income earned from work not provided on a W-2 and certifying that a tax return has not been nor is required to be filed. Documentation noted on the verification worksheet is sufficient for confirmation of wages. If the student has income not listed by a W-2 a signed statement by the student listing the income, source of the income and that the student did not receive a W-2 form for this income.

Persons from a foreign country who are not required to file a tax return can provide a W-2 or an equivalent document. If a person must provide a W-2 form but cannot do it in a timely fashion, he or she may contact the IRS for a W-2 wage transcript. If a W-2 wage transcript is not available for the person, you may permit the person to submit a signed statement with the amount and source of income earned from work and the reason the W-2 is not available at this time.

Persons who submit W-2 wage income over the IRS threshold for non-filing will be required to file a federal income tax return before verification can be completed. Likewise any person that has filed their tax information incorrectly will be required to amend their tax information before the verification process can commence (example: married couple, living together, one filed head of household the other filed single).

2017-2018 (Continued for 2020-2021)

*Non-tax filers and tax filers who received an extension but still have not filed their income tax return must provide confirmation of non-filing dated on or after October 1st, 2018. A confirmation of non-filing can be obtained from the IRS using Form 4506-T and checking box seven. If appropriate, a similar confirmation from another tax authority (ex: a U.S. territory or a foreign government) is also acceptable.

*Dependent students are not required to submit verification of non-filing for 2020-2021 Parents of Dependent students must submit a verification on non-filing to complete verification.

If an Aid Administrator questions a claim that the tax filer has not, will not, and is not required to file a 2018 Internal Revenue Service (IRS) income tax return, the institution must require the applicant to submit a “Verification of Non-filing” from the IRS confirming that the tax filer did not file a 2018 IRS income tax return. The request for “Verification of Non-filing” can be obtained by the tax filer using IRS Form 4506-T and checking box 7. (continued for 2020-2021) Verification of NON-filing is required.

32.8 Data Retrieval Tool Coding

If a student has used the Data Retrieval Tool and did not manipulate the information, the IRS request field on the ISIR will have a value of “02”. This is the only acceptable verifiable Data Retrieval Tool Field Value. If a student or parent declined to use the IRS Data Retrieval Tool or used it but manipulated the information, further investigation is necessary to determine if a Tax Return Transcript is available. There are various reasons why a student or parent may not have been able to use the Data Retrieval Tool. (Please refer to the Verification Chapter in the Application and Verification Guide of the 2018-2019 Federal Student Aid Handbook/ the 2019-2020 AVG is not available to date)

IRS Data Retrieval Tool

All applicants selected for verification, regardless of Verification Tracking Group, who retrieve and transfer their income tax return information, unchanged, using the IRS Data Retrieval Tool—either when initially completing the FAFSA using FAFSA on the Web (FOTW) or through the corrections process of FOTW—are considered to have verified the following FAFSA IRS information, as applicable:

- | | |
|--|-------------------------------|
| -Adjusted Gross Income | -U.S. Income Tax Paid |
| -Untaxed Portions of IRA Distributions | -Untaxed Portions of Pensions |
| -IRA Deductions and Payments | -Tax Exempt Interest Income |
| -Education Tax Credits | |

****New for 2020-2021** – In the event a student is selected for verification the IRS DRT Data Request Flag of ‘02’ is to be considered to be verified. The Data Request Field Flag is no longer required to be considered verified.

2018-2019 (Continued for 2020-2021)

New IRS Display Flags

The Department (ED) added two new flags—Student IRS Display Flag and Parent IRS Display Flag—on the ISIR, SAR, SAR Acknowledgement, eSAR in FAA Access, and in Student Inquiry.

The new IRS Display flags inform schools whether the IRS DRT was displayed to the student or parent, and, if not, the reason the IRS DRT was not displayed.

The IRS Display flags are used in addition to the Student IRS Request Flag and Parent IRS Request Flag, which describe the student or parent's use of the IRS DRT. The IRS Request flags inform schools whether tax information was requested from the IRS and whether the student or parent changed the requested data after it was transferred. The values are explained in the tables attached to this policy.

32.9 2018-2019 Masked Transferred Data (Continued for 2020-2021)

Beginning with the 2018–2019 award year, the actual values of the imported data will not be viewable by students and parents (they will however still appear on the ISIR). This is to enhance security and privacy and to prevent the misuse of sensitive tax-related data. (See the electronic announcement of May 3, 2017). Because aid officers and other officials will be able to see the transferred data, and in keeping with the expectation that they protect the confidentiality of data associated with the Title IV programs, they must not disclose income and tax information from the FAFSA with the applicant, his spouse, or his parents unless they can authenticate their identity.

For example, a student appearing in person and presenting an unexpired, valid, government-issued photo ID such as a driver's license would be an effective way to authenticate his identity. (See the September 5, 2017, announcement for more information).

As a result of IRS data being masked, students and parents will not be able to change data fields on the FAFSA; the Financial Aid Office will need to make corrections.

Also, rollovers will be handled differently. If the DRT transfers a non-zero amount into the untaxed pension or IRA distribution field, the applicant will be asked if any of it is due to a rollover. If he answers yes, he will then enter the rollover amount, which the CPS will subtract when calculating the EFC.

And because of the data masking, students and parents who file a joint tax return will not be able to transfer their income earned from work but will have to manually enter those amounts. **The income earned from work of single persons will, however, continue to transfer.** (See the August 7, 2017, announcement).

***New for 2020-2021 - Masked Social Security Numbers**

Along with many other changes to the FAFSA this year, the Department has made the decision to mask a user's social security number in the event the user is the SSN to log into FAFSA on the web. This is to protect the user's identity, privacy and a more secure way to log in. The SSN will be masked and this will be the default setting. If the user wishes, they can opt to show or hide the values they enter.

Implemented for 2017-2018 (Continued for 2020-2021)

Beginning with the 2017-2018 application, the FAFSA will be available on October 1st, of the year before the upcoming award year.

33.0 Username and Passwords replaces Federal Student Aid PIN

Students and Parent(s) will create a username and password to authenticate their identity when accessing the FAFSA. Rather than entering their SSN, name, date of birth and PIN to perform functions such as starting a renewal FAFSA, signing a FAFSA, making FAFSA corrections, or accessing the IRS Data Retrieval Tool, a user will enter a new FSA ID. This will eliminate the use of Personal Identifiable Information and resolve the issue of multiple PIN assignments for one individual when identifiers change due to life circumstances. **(continued for 2020-2021)**

34.0 FAFSA on the Web Correction Instruction Enhancements

The Department learned through communications with the financial aid community and the Federal Student Aid Information Center that students and parents regularly use the IRS DRT in **Student Correction Entry** to transfer tax information from the IRS but fail to submit the correction for processing after they return to FAFSA on the Web. To minimize such instances, The Department made two changes to the application processing system for 2014-2015. **(continued for 2020-2021)**

- **Enhanced Messaging after Data is transferred** – The Department revised the message that displays when the student or parent returns to FAFSA on the Web after using the IRS DRT. The new message in Student Correction Entry clearly states that the student or parent is “almost” finished and that he or she must sign and submit the application and receive a “Confirmation” page to complete the correction.
- **New E-mails for Saved Corrections** – The Department will now send e-mails to students who save a correction in FAFSA on the Web and who, after seven days, still have not had a correction processed. The Department will also send a similar e-mail to the parent of a dependent student if the parent’s e-mail address is included on the FAFSA. The notification reminds the student to complete, sign, and submit the correction for processing.

35.0 Document Collection Procedures

When documents arrive the documents are retained in the student’s paper file. When all required documents are received, the student is considered complete and ready to be packaged as approved from estimated. The student’s account is updated in the Packaging screen and the student will receive an updated award letter.

35.1 Processing Time Frame

Processing of verification typically takes about two weeks from the time all required documents are submitted.

35.2 Failure to Comply

Students who fail to submit verification documents never become complete. Therefore, aid is not approved for these students. Students who do not complete their file will be notified and informed that a Pennco Payment Plan must be prepared in order to remain enrolled at the institution.

35.3 Submission after Deadline

Students who submit verification documents very late after the time they were requested will be awarded aid on an availability basis. Typically, by the end of the academic year aid funds beyond federal loans and the Federal Pell Grant are depleted. Students are encouraged to submit the documents during the time of their enrollment. However, Pennco Tech will process late submission of verification documents up to 120 days after the student’s enrollment or the published deadline established by the Department of Education for a Pell grant applicant (usually September), whichever is earlier. Campus-Based and Stafford (Direct) Loan applicants must complete verification by the same deadline.

35.4 Notification of Verification to Applicants

Students selected for verification will receive a letter from their FAA informing them of the verification process, definition of verification and the corresponding documentation that will need to be provided for the student’s

financial aid file to complete and approve their financial aid funds. A letter will be given to the student for guidance, and a signed copy retained for their file.

Students are notified that they are selected for verification on the Student Aid Report (SAR). In addition, Pennco Tech Financial Aid Administrators inform students in person of their verification selection status and the necessary documents to complete the verification process.

36.0 Verification of Data Elements

Pennco Tech verifies only those data elements required by the federal government. However, aid administrators are free to ask for additional information if further investigation is needed to resolve a discrepancy. The Department's long-term goal is for a customized approach to verification. A menu of potential verification items for each year are published in the Federal Register and the items to verify for a given application will be selected from that menu and indicated on the student's output documents. Currently, verification is determined by three tracking groups. Students who are selected for verification will be placed in one of the three tracking groups. The group determines which FAFSA information must be verified for the student. The Verification tracking groups are noted below.

***Reminder for Auto Zero EFC Applicants as per the FR 13266 Vol. 83 No. 60**

Verification items are limited for Auto Zero EFC applicants to parent Adjusted Gross Income (for tax filers), or alternatively, parent income earned from work (for non-filers). Independent Auto Zero EFC – eligible applicants are required to verify only student and spouse Adjusted Gross Income, or student and spouse income earned from work (depending on tax filing status) and number of household members (if number of dependents other than a spouse is more than one).

All Auto Zero EFC-eligible applicants must still provide high school completion status and identity/statement of educational purpose if they are assigned by ED to a verification group requiring confirmation of these statuses.

36.1 Standard Verification Group: Tracking Flag V1

Students selected in this verification group are required to provide information for all of the following noted below.

Adjusted Gross Income

Adjusted gross income is verified by comparing a copy of the student, spouse, or parent income tax transcript to ISIR data. Discrepancies must be corrected before further processing.

U.S. Income Tax Paid

U.S. Income Tax paid is verified by comparing a copy of the student, spouse, or parent income tax transcript to ISIR data. Discrepancies must be corrected before further processing

Untaxed Portions of IRA Distributions

This information is located on the Tax Return Transcript. The calculation is determined by the amount of taxable IRA distributions compared to the total amount distributed. If there is a difference between the two, the untaxed portion must be listed on the FAFSA. If it is listed on the FAFSA, compare the amount to determine if it is accurate. If not, correct the FAFSA to the amount determined by the Tax Return Transcript.

Untaxed Portions of Pensions

This information is located on the Tax Return Transcript. The calculation is determined by the amount of taxable Pension distributions compared to the total amount distributed. If there is a difference between the two, the untaxed portion must be listed on the FAFSA. If it is listed on the FAFSA, compare the amount to determine if it is accurate. If not, correct the FAFSA to the amount determined by the Tax Return Transcript.

IRA Deductions and Payments

This information is located on the individual W-2, located in BOX 12 (Please see W-2 attachment for the explanation of deductions)

Tax- Exempt Interest Income

This information is located on the Tax Return Transcript as Tax-Exempt Interest

Education Credits

This information is located on the Tax Return Transcript as Education Credits

Income Earned from Work

This information is located on the Tax Return Transcript as Wages, Salaries, Tips, etc.

Household Size

Household size is verified by comparing the Verification Worksheet to ISIR data. A properly completed verification worksheet serves as verifiable data for accuracy or correction purposes. Discrepancies must be corrected before further processing. All applicants must update household size or number in college to be correct as of the date of verification unless the update is due to a change in the student's marital status.

Number in College

Number in college is verified by comparing the Verification Worksheet to ISIR data. A properly completed verification worksheet serves as verifiable data for accuracy or correction purposes. Discrepancies must be corrected before further processing. All applicants must update number in college to be correct **as of the date of verification** unless the update is due to a change in the student's marital status.

NOTE: Verification of number in the household size is not required if –

- **For a dependent student the household size indicated on the ISIR is two (2) and the parent is single or separated, divorced or widowed, or the household size on the ISIR is listed as three (3) and the parent is married or unmarried and living together.**
- **For an independent student the household size indicated on the ISIR is one (1) and the applicant is single, divorced or widowed or the household size indicated on the ISIR is two and the student is married.**

NOTE: Verification of number in the household size is not required if –

- **The number in college is indicated on the ISIR is one (1)**

(Continued for 2020-2021)

The number of household members for dependent students must now include both of a dependent student's legal (biological or adoptive) parents if the parents live together, regardless of the marital status or gender of the parents (see [Dear Colleague Letter GEN-13-12](#)).

Number of persons in college

Number of family members enrolled at least half-time in post-secondary institutions is verified by comparing the Verification Worksheet to ISIR data. Discrepancies must be corrected before further processing.

36.2 Custom Verification Group: Tracking Flag V4

High School Completion Status and Identity/Statement of Educational Purpose

Students must verify high school completion status and identity/statement of educational purpose. A properly completed identity/statement of educational purpose form coupled with an unexpired valid government issued identification card and a high school diploma or high school transcript showing a graduated status from an accredited school serves as completion of this verification group.

*Financial Aid Administrators are required to report the results from students selected in this tracking group by the Central Processing System. Please see attached Electronic Announcement explaining how to report this information to the CPS. ONLY THOSE STUDENTS SELECTED FOR THIS FLAG BY THE PROCESSOR SHOULD BE ENTERED INTO THE FAA ACCESS TO CPS ONLINE SYSTEM. (IF A STUDENT IS SELECTED FOR THIS VERIFICATION FLAG IN SUBSEQUENT YEARS, THERE IS NO NEED TO REQUEST THE DOCUMENTATION CONFIRMING HIGH SCHOOL DIPLOMA STATUS AND/OR AN ID CONFIRMING THE STUDENTS IDENTITY HOWEVER, THE INFORMATION MUST BE REPORTED TO THE CPS AS IF VERIFICATION WAS SATISFACTORILY COMPLETED FOR THAT YEAR.)

36.3 Aggregate Verification Group: Tracking Flag V5

Students must verify high school completion status and identity/statement of educational purpose in addition to the items in the Standard Verification Group (V1).

*Financial Aid Administrators are required to report the results from students selected in this tracking group by the Central Processing System. Please see attached Electronic Announcement explaining how to report this information to the CPS.

ONLY THOSE STUDENTS SELECTED FOR THIS FLAG BY THE PROCESSOR SHOULD BE ENTERED INTO THE FAA ACCESS TO CPS ONLINE SYSTEM. (IF A STUDENT IS SELECTED FOR THIS VERIFICATION FLAG IN SUBSEQUENT YEARS, THERE IS NO NEED TO REQUEST THE DOCUMENTATION CONFIRMING HIGH SCHOOL DIPLOMA STATUS AND/OR AN ID CONFIRMING THE STUDENTS IDENTITY HOWEVER, THE INFORMATION MUST BE REPORTED TO THE CPS AS IF VERIFICATION WAS SATISFACTORILY COMPLETED FOR THAT YEAR.)

For verification tracking groups V1 and V5, if the financial aid administrator determines that the amounts provided and **verified** from other income information (e.g., adjusted gross income, income earned from work, untaxed income not included on the FAFSA) do not appear to provide sufficient financial support for the applicant and, if appropriate, the applicant's parents or spouse must explain how the family was financially supported during the 2018 calendar year. Financial Aid Administrators will use the **Explanation of Support form** to determine the family's income and resources.

*New for 20-21 –Regulation Deadline December 31st, 2020

DOE Electronic announcement May 15th, 2020 - UPDATED Guidance for interruptions of study related to Coronavirus (COVID-19)

Verification of High School (or Equivalent) Completion Status Official documentation of high school completion or documentation of the equivalent of high school completion may be difficult for FAFSA applicants to obtain during this national emergency. For applicants in verification groups V4 or V5, institutions should use documentation of an applicant's high school completion status that it may already have obtained for other purposes (e.g., documentation maintained in its admissions office). Where an applicant is unable to obtain such documentation and an institution does not already have such documentation, it may accept a signed and dated statement from the applicant in which he or she truthfully attests to his or her secondary school completion or the equivalent. The statement must indicate whether a high school diploma or the equivalent was obtained and date of

completion (or approximate date). This guidance applies until December 31, 2020, for both the 2019-2020 and 2020-2021 award years.

In addition, institutions that require (as a result of their own policies) an official transcript to verify a student's eligibility for Title IV participation that are unable to obtain a transcript after making a reasonable effort to do so institutions may accept assigned and dated statement from the applicant in which he or she truthfully attests to his or her secondary school completion. While this attestation does not obviate institutional requirements to meet applicable state authorizing agency or accrediting agency requirements regarding proof of high school or equivalent completion status, the Department is granting authority to accrediting agencies to implement temporary changes to its policies regarding verification of high school completion for the time period covered by this guidance, and any extensions to the time frame granted by the Department in the future.

36.3 (a) Reserved for FSA Purposes (No Longer Selection)

- Verification V6 Group (Household Resources) -reserved for FSA purposes
- Verification V2 Group (SNAP formally Food Stamps) -reserved for FSA purposes
- Verification V3 Group (Child Support Paid) -reserved for FSA purposes

36.4 Institutional Discretionary Items

The FAO verifies those applicants identified by the Department. Aid administrators may select a student for verification if there is a discrepancy or a condition that is unusual and warrants investigation. If a student submits verification documentation (i.e. tax transcripts), the FAO staff must verify the information on the document against the information in the student's file.

36.5 Notification Verification is Complete

Students receive an award letter confirming the sources and amount of financial aid awarded after verification has been completed. Students sign a new award letter if estimated aid has changed. If not, the student's original award letter is sufficient.

36.6 Correction Procedures

If corrections are needed, the student will be required to update the incorrect FAFSA information. This will result in a subsequent SAR. Once received, verification will be done on the updated information. For students selected for verification and who are receiving subsidized aid, changes that result to any non-dollar item and to any dollar item of twenty five dollars or more must be submitted for processing. If a non-dollar item needs to be corrected, all corrections must be completed for the student's verification.

37.0 Conflicting Information for Non-selected Applicants

Aid Administrators are required to resolve any discrepancies discovered in a student's file. Aid administrators will use all information noted in the student's file and from other departments to determine if conflicts exist. Students are responsible for complying with any information Aid Administrators request to clear conflicting information. Students will be informed of what documents to submit to clear the conflict.

Comment code 400 for parents and 401 for students are specific regarding conflicting information from the IRS DR tool and the ISIR. Please review the 2018-2019 AVG page 15 for further guidance on resolving the conflicting information. Students and parents will have a comment code regardless of whether or not the student is selected for verification. The comment codes must be resolved satisfactorily before awarding the students Title IV funds. **(Continued for 2020-2021)**

38.0 Updating Information CFR 668.55

Generally, a student cannot update information that was correct as of the date the application was filed because the FAFSA is considered to be a snapshot of the family's financial situation as of that date. After the FAFSA is signed, only certain items can be updated under the following conditions:

All applicants whose dependency status changes must update that status and the associated FAFSA information throughout the award year except when the update is caused by a change in the student's marital status.

All applicants selected by the Department or the school for verification of household size or number in college must update those numbers to be correct as of the date of verification unless the update is due to a change in the student's marital status.

Pennco Tech will not update the above due to a marital status change unless it is deemed necessary to address an inequity or to reflect more accurately the applicant's ability to pay. Each decision will be made on a case by case basis and the reason must be well documented in the student's file. The new Estimated Family Contribution will be used to award and disburse all title IV aid.

39.0 Disbursements

39.1 Interim Disbursements CFR 668.58

Pennco Tech does not disburse any student's Title IV aid until verification is complete and a subsequent ISIR has been received as verified. On occasion there may be instances where it is warranted to disburse funds on an interim basis to a student. Those students will be handled on a case by case basis and thoroughly documented as to why the intermittent disbursement was made. Only Pell and Federal Supplemental Education Grant (FSEOG) funds are eligible to be disbursed for the student prior to a properly completed verified ISIR.

39.2 Selection after Disbursement

A student's application might be selected for verification after corrections are submitted and the student has been paid based on the previous unselected CPS transaction. Aid Administrators must verify the applicant before making any subsequent or further disbursements.

If verification does not justify aid already disbursed, Pennco Tech will make the necessary adjustments to the aid package and the student will be responsible for repaying all aid for which he or she was not eligible for with the exception of Stafford (Direct) Loan.

39.3 Submitting Changes

Changes are submitted to CPS through Pennco Tech's CampusNexus system. FAA access to CPS online is an alternative system to use in order to correct or update a student's ISIR. A corrected ISIR should be received by Pennco Tech within 72 hours. Once the verified ISIR is received, Pennco Tech will award and disburse aid on that particular transaction.

39.4 Late Disbursements

Generally a student ceases to be eligible for aid once he or she has finished the term and is no longer enrolled. However, the student may submit verification documentation and receive a late disbursement after that time if the Department processed a SAR or ISIR with an official EFC while they were still enrolled. As per guidance from the Federal Register indicating the last date an eligible student is entitled to receive a disbursement from any of the Title IV programs.

40.0 Verification Following Disasters GEN-10-16

The Secretary will not enforce verification requirements during the award year for applicants whose records were lost or destroyed because of a disaster. Pennco Tech will document when a student is not required to have verification performed due to this status. Pell Grant disbursements will be documented with a status code of "S".

41.0 Parent Remarriage after Applying

While the applicant does not typically update household size or number in college because of a change in marital status, if a student is dependent and his/her parent remarries between application and verification, he /she must update household size to include the new stepparent. However the student would not count the new stepparent's income and assets.

42.0 Cases when a Tax Transcript May Not Be Available

Victims of identity theft: When the IRS determines that a tax filer has been or likely was a victim of identity theft, it will not allow the filer to use the IRS Data Retrieval Tool or to get a Tax Return Transcript until the matter has been resolved, which in some complex cases can take up to a year.

Victims of identity theft who cannot get a return transcript or use the DRT submit a Tax Return DataBase View (TRDBV) transcript as well as a statement they have signed and dated indicating that they were victims of tax-related identity theft and that the IRS has been made aware of it. They do this by calling the IRS's Identity Protection Specialized Unit (IPSU) at 800-908-4490. After the IPSU authenticates the tax filer's identity, she can ask the IRS to mail her the TRDBV transcript, which is an alternate paper transcript that will look different than a regular transcript but is official and can be used for verification.

Unless aid administrators doubt the TRDBV transcript's authenticity, you do not need to get an IRS signature or stamp or any other validation. (See DCL GEN-14-05) for a sample TRDBV transcript. Those who cannot obtain a TRDBV transcript may instead submit another official IRS transcript or equivalent IRS document if it includes all of the income and tax information required to be verified.

43.0 Amended tax returns:

If the student or parent filed an amended tax return, they must submit a signed amended tax return (1040X) along with a Tax Return Transcript that includes the information from the original tax return, and does not have to be signed. Or any other IRS tax transcript(s) that include all of income and tax information required to be verified. (Please See AVG –P15 for further guidance on amended tax returns and the DR Tool)

Tax returns from foreign countries and other specific locations: Students or parents from foreign countries may not have a U.S. Tax Return. In this case Administrators must accept a translated copy of the student or parent(s) foreign tax return converted into U.S. dollars or a signed statement certifying their income and taxes paid.

44.0 SUBSEQUENT ISIRs

Pennco Tech Office of Financial Aid will review all subsequent transactions for a student for the entire processing year even if verified on an earlier transaction. The initiative is to determine if there has been a change in the student's EFC, a new SAR comment code, NSLDS information or if the "C" flag status has changed and requires resolution that would impact eligibility for aid.

If none of the above is noted generally no action is required. If the EFC does change but either does not affect the amount and type of aid received or the data elements that changed were already verified, no action is required.

If the EFC changes and the pertinent data elements were not verified then aid administrators must investigate. Anytime a "C"-flag changes or NSLDS data have been modified, administrators must resolve any conflicts.

45.0 Overpayments

FAO policies and procedures are designed to eliminate the possibility of an overpayment from any fund. If however, an overpayment does occur, students' academic transcripts are withheld until the account has been cleared.

46.0 Need Analysis

The Financial Aid office uses the federal methodology of needs analysis and the Expected Family Contribution (EFC) result from the FAFSA.

Because the formula focuses on a snapshot, the information on the application form must be accurate as of the application date. If the financial aid administrator discovers that any of the submitted information was inaccurate as of the application date, he or she can make a correction to that information. The financial aid administrator may not, however, update the information on the application form to reflect changes that occurred after the application date, with a few notable exceptions.

Those exceptions relate to applications selected for verification. In particular, changes in the household size and number in college can be updated when the application is selected for verification (but only if the application is selected for verification), if the change is due to something other than a change in the applicant's marital status. The new information should be accurate as of the verification date.

This verification policy and procedures manual serves the purpose of documenting how Pennco Tech will complete the verification process and the overall understanding of the verifiable items and the acceptable documentation to resolve those items. This verification policy does not cover every single instance that could appear through-out the verification process. The FAO will consult all resources to make the most accurate decisions when completing a student's verification.

47.0 Professional Judgment (PJ) Special Cases HEA Sec. 479A(a) -

There are unusual situations when Aid Administrators will need to exercise their discretion. Some cases may be related to modifying a student's data that calculates the EFC, performing a dependency override, resolving conflicting information, reporting cases of fraud, and determining a student to be an unaccompanied homeless youth. Professional judgment does allow a Financial Aid Administrator to adjust the information on the form, but only given the existence of special circumstances.

Aid Administrators may use PJ on a case-by-case basis only to adjust the student's cost of attendance or the data used to calculate the student's EFC. This adjustment is only valid at Pennco Tech. The reason for the Adjustment must be documented in the student's file, and it must relate to the special circumstances that differentiate the student-not to conditions that exist for a whole cohort of students. Administrators must resolve any inconsistent or conflicting information shown on the SAR before making any adjustments.

If a student is selected for verification, verification must be completed before PJ can be exercised. An Aid Administrator's decision regarding adjustments is final and cannot be appealed to the Department. The law does not allow Aid Administrators to modify either the formula or the tables used in the EFC calculation. Pennco Tech will exercise Professional Judgments for students in the following cases:

47.1 Determining if an otherwise Dependent student should be independent (Dependency Override) HEA Sec. 480(d)(7)

Students who may be eligible for a Dependency Override must meet extraordinary conditions such as family abuse, estrangement from parents, abandonment, parental incarceration, incapacitating parental illness or other unusual family circumstances. A student's ability to demonstrate self-sufficiency, parent(s) refusing to contribute to the student's education, parent(s) unwillingness to provide information on the FAFSA or for verification purposes is not acceptable grounds to process a Dependency Override Professional Judgment.

Any student that believes he or she meets the criteria for a Dependency Override must complete Pennco Tech's Dependency Override Application, submit a signed and dated personal statement explaining the relationship with his/her mother and father, a statement from his/her custodian or person he/she resides with, a letter from a non-family member to corroborate his/her statement(counselor, teacher, clergy, community group, social services agency, medical personnel, court, high school official or any other disinterested third party deemed suitable by the Financial Aid Administrator).

Once all documentation has been received the Financial Aid Administrator can make a sound decision as to the approval or denial of the student's Dependency Override Application. Typically, another adult is assisting the student (a grandparent, a girlfriend/boyfriend's parent). If the student is receiving other assistance, in-kind support should be checked and documented. If the application is approved Aid Administrators will flag the transaction in CampusNexus as Dependency Override Indicator, the student will receive a subsequent ISIR with a dependency status of Independent. The student's awarding and disbursing will be applied on the Dependency Override ISIR with a valid EFC.

47.2 EFC Adjustment Request (Reduction in Income) HEA Sec. 479A

Students or parents who have had a reduction in their income for any of the reasons noted below will be required to complete an EFC Data Adjustment Request Form and attach all necessary documentation. EFC Adjustments are completed by comparing Prior Prior Year (PPY) income to current changes in the student, spouse or parent(s) situation.

2019-2020: The field name was changed on the ISIR to add "Flag." This flag indicates the status of an EFC adjustment resulting from a professional judgment decision by an FAA. **(Continued for 20-21)**

2019-2020: Dependency Override Indicator. The field name was changed on the ISIR to add "Indicator." **(Continued for 20-21)**

The Financial Aid Administrator will determine the appropriate income year regarding the student's, spouse's or parent's change. The FAFSA now requires 2016 tax year income, which is PPY Income. As a result of this change a student, student's parent(s) or spouse may have had a change occur regarding their income situation during any one of the years 2017 or 2018. Financial Aid Administrators will determine eligibility for an adjustment by reviewing all relevant information specific to a student's income circumstances and determine the appropriate PJ adjustment for the student by considering either Prior Year 2017 income or Projected Year 2018 income. Students will be notified in writing of the specific adjustment used to process their Professional Judgment application.

Students who already have a zero EFC are not eligible for an EFC Adjustment request as zero is the lowest EFC possible.

- Job Loss
- Separation/Divorce
- Medical Expenses over 11% of IPA
- Roth IRA inflation of AGI
- Death of a wage earner

47.2 (a) PJ and Unemployment Benefits (DCL GEN-09-04 and GEN-09-05)

If a student or parent is receiving unemployment benefits, Aid Administrators have the authority to collect documentation to determine the receipt and zero out any income earned from working as well as the unemployment benefit amount. Aid Administrators must use the EFC Adjustment Checklist Worksheet to display the amount of income earned from work and unemployment income that was disregarded under this provision. Once all necessary documentation is received Aid Administrators will complete the adjustments appropriately and flag the transaction in CampusNexus as a FAA Professional Judgment. The student will receive a subsequent ISIR with a Professional Judgment indicator. The student's awarding and disbursing will be applied on the PJ ISIR.

47.3 Unaccompanied Homeless Youth (McKinney-Vento Homeless Assistance Act)

A Financial Aid Administrator can also determine if a student is an unaccompanied youth who is either homeless or is self-supporting and at risk of being homeless. It is important to examine the student's living situations and claims on a case-by-case basis. If a student does not have, and cannot get, documentation from any of the authorities you must determine if he/she is an unaccompanied youth who is homeless or is self-supporting and at risk of being homeless.

Aid Administrators must use the Unaccompanied Homeless Youth Verification form as guided by the National Association for The Education of Homeless Children and Youth (NAEHCY), if the student cannot provide third-party documentation confirming their homelessness. Students that are homeless as a family unit are not eligible to answer the questions related to unaccompanied youth at risk or homelessness.

47.4 Homeless youth definitions at-risk of being:

- Homeless: lacking fixed regular and adequate housing
- Self-Supporting: when a student pays for his own living expenses, including fixed, regular and adequate housing.
- Unaccompanied: When a student is not living in the physical custody of a parent or guardian.
- Youth: a student who is 21 years old or younger or still enrolled in high school as of the date he/she signs the FAFSA application.

*Students who do not meet the definition of youth because they are older than 21 (and not yet 24) and who are unaccompanied and homeless or self-supporting and at risk of being homeless qualify for a homeless youth determination.

Supporting information to determine a student's unaccompanied homeless youth status can be from a school districts homeless liaison, state homeless education coordinator or the director of a shelter or transitional housing program. If an Aid Administrator has determined a student as an unaccompanied homeless youth, the Aid Administrator will select the appropriate response in CampusNexus: Unaccompanied Youth determined by school district liaison, Unaccompanied Youth determined by HUD, or at risk of homelessness. If an Aid Administrator has determined that the student is at risk of being homeless by the McKinney-Vento Interview Application the appropriate response is to select at risk of being homeless in CampusNexus.

47.5 Students without Parent Support (Parent Refusal Form)

Students whose parents refuse to support them are not eligible for a dependency override; however they may be able to receive unsubsidized Stafford (Direct) loans only. For a student to be eligible for this provision Aid Administrators must get documentation:

- (1) That the student's parent(s) refuse to complete his/her FAFSA
- (2) That they do not and will not provide any financial support to the student. Include the date support ended. If the parent(s) refuse to sign and date a statement to this effect, you must get documentation from a third party (the student is not sufficient), such as a teacher, counselor, cleric, or court.

Pennco Tech Financial Aid Administrators are required to have the parent of the student complete the Parent Refusal Form as clear documentation for making a decision to award a student an Unsubsidized Direct loan. The student will need to file the appropriate FAFSA for the award year and receive a rejected ISIR. The student must also complete Entrance Counseling and an MPN on www.studentloans.gov in order to receive the unsubsidized loan.

Students qualifying under the above regulation are only eligible for dependent academic year maximum loans based on their grade level. (See Direct Loan section of this manual)

47.6 Staff Authority

Professional Judgment (PJ) decisions may be made to adjust eligibility for all Title IV and Campus- Based aid. Documentation supporting special circumstances must be maintained in the student's file. The Financial Aid Assistant Director and the FAO Administrators have the authority to adjust a student's eligibility using Professional Judgment.

48.0 Failure to Register for Selective Service Appeal Process (Men ages 26 years and older)

The FAFSA process applies data matches to each individual student. All males applying for federal assistance to attend school must have complied with the Selective Service Registration process. The Central Processing System (CPS) will match data for a given student to the Selective Service database. If it is found that a man required to register with Selective Service has not satisfied the requirement, he will be required to either register (if between the ages of 18-25) or file an appeal (if over the age of 25) with the Financial Aid office at Pennco Tech explaining the reason why he did not register with Selective Service.

Men who are 26 years of age and older are beyond the age of compulsory registration. According to law, a man must register with Selective Service within 30 days of his 18th birthday. Selective Service will accept late registrations but not after a man has reached age 26. Some men who failed to register during the time they were required to do so may now find they are ineligible for certain benefits, such as financial aid.

Men born from March 29, 1957 to December 31, 1959 were not required to register because the registration program was not in operation at the time they turned 18. The requirement to register was reinstated in 1980 and applies to all men born on or after January 1, 1960. In order to appeal his ineligibility for financial aid, a student must complete the following appeal process.

1. Obtain a letter from Selective Service stating that you are not registered. You can obtain the SSS letter as follows:

If you did not register with Selective Service, and are now a man over age 25, you may be ineligible for certain federal or state programs and benefits, including U.S. citizenship. The Financial Aid Office requires that you provide an official response from the Selective Service indicating if you were or were not required to register. To receive such a letter from the Selective Service System, visit www.sss.gov and request a status letter, print the request and a Pennco Tech Financial Aid Administrator will assist you with the process.

You will have to describe, in detail, the circumstances you believe prevented you from registering and provide copies of documents showing any periods when you were hospitalized, institutionalized or incarcerated between your 18th and 26th birthdays. If you are a non-citizen, you may be required to provide documents that show when you entered the United States. Please include your name, Social Security number, date of birth and return address.

2. Write a letter of appeal to the Office of Financial Aid using the Selective Service Appeal Form

If you have passed your 26th birthday and are now being denied eligibility for federal, state or institutional financial aid, you have the following recourse available to you: Write a letter to the Office of Financial Aid explaining the reasons for your failure to register with Selective Service. Citing ignorance of your responsibility to register is not a sufficient excuse for having failed to register. Offer as much evidence supporting your appeal, and as much detail, as possible. Sign and date the appeal form and attach all documentation for review.

3. The Office of Financial Aid, not the Selective Service, will determine whether you have shown that your failure to register was not knowing and willful. The appeal review requires approximately 14 days. The final decision regarding your eligibility for aid at Pennco Tech will be made by the Office of Financial Aid.

4. If your appeal is approved, you will be awarded financial aid on the same basis as other students, provided you meet all other program eligibility requirements.

5. If your appeal is denied, you will not be eligible for financial aid (including loans) of any type at Pennco Tech

The above text was excerpted in part from the Selective Service Web site.

49.0 Participation in Financial Aid programs

The FAO participates in a variety of Financial Aid programs. Assistance may include scholarships, grants, and/or loans. Scholarships and grants are gift awards which do not have to be repaid. Loans are self-help awards since repayment is required. The type of aid awarded depends upon the student's financial need and is generally a combination of gift and self-help assistance.

49.1 Institutional and Program Eligibility

The Program Participation Agreement (PPA) is appropriately signed and validated, representing that Pennco Tech complies with the laws, policies, and regulations governing the Federal Student Aid programs. The Financial Aid Executive Director and the Director of Business Office operations tracks and coordinates the recertification process for Pennco Tech. The Eligibility and Certification Approval Report (ECAR) contains the most critical data elements that determine the basis of the institution's approval.

49.2 Institutional Eligibility

As a proprietary institution, Pennco Tech has been authorized by the United States Secretary of Education to participate in the financial aid programs authorized by Title IV of the Higher Education Act of 1962 as amended.

49.3 Terms of Agreement

The Program Participation Agreement between Pennco Tech and the Department of Education entitles the FAO to participate in the following federal programs:

The FAO applies for Campus Based funds through the Fiscal Operation Report and Application to Participate (FISAP). The FAO applies annually for federal funds through the FISAP which is submitted each year either late September or early October. The financial aid staff works together to collect the necessary statistics to complete the report. The Executive Director loads the finalized data into the Electronic FISAP Program on the eCampusbased website and the information is signed and sent to the Department of Education.

50.0 Federal Programs

The federal programs in which the FAO participates are listed in the section above. The Federal Perkins Loan Program and the Federal Supplemental Educational Opportunity Grant Program are referred to as campus-based programs because although funded primarily with federal dollars, the institution is able to determine how these funds should be awarded to students. FSEOG requires a twenty five percent non-federal Pennco Tech Match for each student's disbursement.

- Federal Pell Grant Program
- Federal Supplemental Educational Opportunity Grant
- Federal Direct Loan Programs
- Direct Subsidized Stafford Loan Program
- Direct Unsubsidized Stafford Loan Program
- Parent Plus Loan for Undergraduate Students
- Federal Perkins Loan Program (Retired-no extension provided)*

51.0 Federal Pell Grant

The Federal Pell Grant is an entitlement program. Students must demonstrate financial need to qualify. Financial need is determined by the Estimated Family Contribution provided on the student's SAR and ISIR.

51.1 Purpose of Program

The Federal Pell Grant program is federally funded with the purpose of helping financially needy students meet the cost of post-secondary education. This program is centrally administered by the federal government and is typically the foundation of a student's aid package.

51.2 Determine Eligibility

The FAO uses the Pell award as the foundation of the student's financial aid package. Therefore, students requesting financial assistance during their enrollment are required to establish Federal Pell Grant eligibility before additional determination of funds eligibility is made and/ or awarded. Beginning with the 2017-2018 Award Year students are eligible to receive up to 150% of their scheduled award.

In order to determine eligibility for any federal financial aid program, students must file a Free Application for Federal Student Aid (FAFSA) and have the results sent to Pennco Tech. The FAO will accept results through electronic transmission with the Central Processing System (CPS). Student eligibility is determined only through the CPS of the Department of Education using the Federal Methodology need analysis formula. The FAO must have an official EFC before eligibility for any fund may be determined.

Students are notified of the amount of the Pell Grant through an award letter. With the award letter, the student receives documentation stating how funds are to be disbursed.

Pell awards are recalculated when there is a change in the EFC and when the cost of attendance changes.

Students who submit eligible SAR's or have electronic Pell data submitted to Pennco after the end of an enrollment period for which the student met all the necessary criteria, will receive a retroactive (late) award provided the student's file is complete and the student is eligible based on late disbursement condition rules.

51.3 Payment

Pell Grant funds are disbursed to students. The Pell Grant is disbursed through electronic transmission to the Bursar Office. Pell Grant funds are applied to tuition charges first; any credit balances that the student has not authorized Pennco Tech to manage will be delivered to the student.

51.4 Over-awards

In the event of an over-award, the student's account is placed on hold until such time that the overpayment is rectified.

51.5 Recordkeeping

Financial Aid records are maintained in the student's folders as well as CampusVue. The Senior Financial Aid Manager and the Assistant Director are responsible for account management and appropriate record security for all student aid account transactions. The amount and date of any overpayment restored to the program account, the cost of attendance, determination of enrollment status, enrollment period and eligibility of enrolled students who submit valid Pell records, name, Social Security number, amount paid, and amount and date of each payment are maintained electronically and in appropriate binders and electronic records on select Pennco Tech drives.

51.6 Student Eligibility

Students must meet the eligibility requirements. In addition, the Pell Grant is awarded only to undergraduates up unto a student's first bachelor's degree. After a bachelor's degree has been obtained whether foreign or domestic a student is not eligible for PELL funds. Student eligibility is determined only through the Central Processing System of the Department using the Federal Methodology need analysis formula.

51.7 Amount of Federal Pell Grant

The amount of Federal Pell Grant for which a student is eligible is determined using the Expected Family Contribution (EFC) and the corresponding cost of education from the Federal Pell Grant Eligibility Chart published by the Department. The maximum amount varies from year to year and is based on congressional funding for the program.

51.8 Verification Procedures

Verification procedures for the Federal Pell Grant are identical to other Title IV aid. See verification section of this manual.

52.0 Federal Supplemental Educational Opportunity Grant (FSEOG)

The FSEOG is a gift program for students who demonstrate financial need.

52.1 Purpose of program

34 CFR 676.4

The FSEOG program is federally funded for the purpose of helping financially needy students meet the cost of post-secondary education. This program is administered by the institution; however, FSEOG funds are awarded to Pell Grant recipients first with a zero EFC (first selection).

52.2 Determining Eligibility

In order to determine eligibility for any federal financial aid program, students must file a Free Application for Federal Student Aid (FAFSA) and have the results sent to Pennco Tech. The FAO will accept results through electronic transmission with the Central Processing System (CPS). Student eligibility is determined only through the CPS of the Department of Education using the Federal Methodology need analysis formula. The FAO must have an official EFC before eligibility for any fund may be determined.

FSEOG grants are awarded to students who qualify for a Pell Grant and have a zero EFC. Students are notified of the amount of their FSEOG eligibility through an award letter. With the award letter, the student receives documentation stating how funds are to be disbursed.

52.3 Matching Requirement

Pennco Tech matches the federal allocation of FSEOG funds by 25% as prescribed by law. Student ledgers are posted with a non-federal share (25%) disbursement first. After the non-federal share is posted, students federally funded share (75%) of the FSEOG grant is disbursed and applied to the students account. The total of the non-federal share (25%) and federal share (75%) equal the student's total (100%) FSEOG award.

52.4 Payment

FSEOG funds are disbursed to students. Before disbursement, a compliance computer match is run to ensure the student remains eligible for the grant and is meeting all Satisfactory Academic Progress rules and clock hour rules for disbursements.

The FSEOG is disbursed through the Financial Aid Office to the Bursar Office. The Bursar office subtracts tuition and other appropriate outstanding charges before releasing the remaining proceeds to the student.

52.5 Over-awards

In the event of an over-award, the student's account is placed on hold until such time that the overpayment is rectified. Pennco Tech will also complete the necessary steps to resolve the over-award and ensure the over-award does not become an overpayment.

52.6 Recordkeeping

Financial Aid records are maintained in student's files as well as in CampusNexus. Student records include the demonstration of need and FSEOG eligibility. The Assistant Directors, Senior Financial Aid Managers and the Administrators are responsible for account management and appropriate record security for all student aid transactions and how need was met for all aided students.

52.7 Student Eligibility, Selection and Amount of Award

Students must meet the student eligibility requirements. In addition, FSEOG is awarded to Pell eligible students with a zero EFC. Pennco Tech receives a small allocation at the beginning of each award year. Once those funds are exhausted The Financial Aid Office will not award any additional funds to students. FSEOG schedules are adjusted and updated per the Department of Ed's allocation. The FAO self- imposes minimum and maximum awards to ensure that the greatest number of students have an opportunity to receive a portion of the FSEOG allocation. Award amounts may change each award year. The Bristol and Blackwood Financial Aid Offices have specific award amounts as it relates to each program. FSEOG schedules are reviewed each award year and adjusted for each program.

52.8 Disbursement Procedures

FSEOG funds are disbursed to students only after an official EFC from the Central Processor has been received. Students must meet Satisfactory Academic Progress and disbursement rules for clock-hour schools.

53.0 Federal Perkins Student Loan Program

The Federal Perkins Loan program has been retired. It has not been extended through congress or the law. Students who have received Perkins Loan funds at Pennco Tech are responsible for repayment.

54.0 Federal Direct Loan Programs

The rules for awarding Direct Loans are different than for Pell Grants and other FSA programs. For Direct Subsidized/Unsubsidized Loans, there are annual loan limits that vary by grade level, and there are aggregate limits on the total (cumulative) loan amount that may be outstanding at one time. The loan period, payment period, and disbursements within that period may not always correspond to the payment periods that Pennco Tech may use for Pell Grants. The requirement to prorate Direct Subsidized/Unsubsidized Loan limits under certain circumstances is different than the requirements for calculating Pell Grants

54.1 Academic Year (BBAY)

Pennco Tech uses a Borrower Based Academic Year as opposed to a Scheduled Academic Year. The Borrowers Academic Year and Loan Period float with the borrower's program. The borrower must successfully complete the clock hours and weeks of instructional time in the FSA academic year before the borrower is eligible for a new annual loan limit. Loan limits are noted below.

54.2 Dependent Undergraduates (excluding dependent students whose parents can't get PLUS)

<u>Subsidized</u>	<u>Total Amount including Unsubsidized</u>
First Year.....	\$3,500\$5,500
Second Year.....	\$4,500\$6,500
Third Year and Beyond.....	\$5,500\$7,500

54.3 Independent Undergraduates & Dependent Students whose parents can't get PLUS

First Year.....	\$3,500.....	\$9,500
Second Year.....	\$4,500	\$10,500
Third Year and Beyond.....	\$5,500.....	\$12,500

Note: All undergraduate annual loan amounts are subject to proration. As noted below.

Aggregate Limits for Subsidized and Unsubsidized Loans

<u>Subsidized</u>	<u>Total Amount including Unsubsidized</u>	
Dependent Undergraduates (excluding those whose parents can't borrow PLUS).....	\$23,000.....	\$31,000
Independent Undergrads & Dependent Students whose parents can't get PLUS.....	\$23,000.....	\$57,500

54.4 SULA Rules: The Department of Education introduced a new regulation regarding Subsidized Loan usage. Students who are considered first time borrowers as of July 1, 2013 are flagged with a special indicator to track their subsidized loan usage. First time borrower are those students who had no current borrowing under the FFELP or Direct Loan Programs as of July 1, 2013. The usage selection indicator determines the amount of subsidized loans the student has received in comparison with the published length of the student's program. The student's Subsidized Loan usage is tracked and documented in the Common Origination and Disbursement system.

Students should pay careful attention to their program length, subsidized loan awards and any adjustments to their subsidized loan period during or after their enrollment.

For each program offered at Pennco Tech, students have a maximum eligibility period. The maximum eligibility period is determined by the published length of the student's program in weeks, divided by the associated academic year of the program, multiplied by 150% (1.5). Students are eligible to receive subsidized loan funds up to 150% of the published program length. Please see the example listed below for a student enrolled in Pennco Tech's Automotive Technology (Day) Program and how his/her maximum eligibility period is calculated.

Auto Tech Program: **Published length of Program:** 1800 hours 52 weeks **Associated Academic Year:** 900 hours 26weeks
 Formula: $52 \text{ weeks} / 26 \text{ weeks} = 2 \text{ years} \times 1.5 = 3$

The student's full published program length is 1800 hours completed over 52 weeks of attendance. The academic year associated with this program is 900 hours completed during 26 weeks of attendance. The maximum eligibility period for the above student to receive subsidized loan funds is 3 academic years. The academic years are associated with loan periods within the academic year. For this program the above student would have three (2) loan periods. Should the student officially or unofficially withdraw, leave the institution for any reason or request to cancel the loan, Pennco Tech must update the student's loan period to reflect the actual period of attendance associated with the student's loan period.

Updating the student's loan period is crucial to the student's proper calculation of subsidized loan usage. Failure to update the information accordingly could prevent a student from receiving subsidized funds that the student could otherwise be eligible for conversely a student could be deemed eligible to receive subsidized loan funds when he/she may not truly be eligible. Pennco Tech has established a process to review the student's full eligibility usage at the time of enrollment, awarding and departure. Should a student's loan period need to be

adjusted for any of the aforementioned reasons the Assistant Director and Senior Financial Aid Manager makes the appropriate adjustments to the student's record to update the loan period and calculate the correct subsidized usage.

Pennco Tech must also take into consideration subsidized loan funds a first time borrower has received at any other institution. There may be cases when a student is not eligible for a subsidized loan at Pennco Tech due to the previous institutions failure to adjust the student's loan period after a withdraw or termination from that institution. Students who have this situation will be informed by their Administrator and alternative funding options may be established for the student.

54.5 Proration

The annual maximum loan amount an undergraduate student may receive must be prorated when the borrower is:

- Enrolled in a program that is shorter than a full academic year; or
- Enrolled in a program that is one academic year or more in length, but is in a remaining period of study that is shorter than a full academic year.

Aid Administrators should keep in mind that loan limit proration determines the maximum loan amount that a student may borrow for a program or remaining portion of a program, not the loan amount that the student actually receives. In some cases, the actual loan amount that a student is eligible to receive (based on COA, EFC, and other aid) may be less than the prorated loan limit. The formula for calculating the prorated portion of a loan is noted below. Proration rules for Pell are similar however, the institution must take into consideration not only the clock hours the student is enrolled for the program but also the weeks the student is enrolled in the program. Pell proration is based on Formula 4.

Clock-hours enrolled in program

Clock-hours in academic year

For Pell Must Compare and Select the lesser of the two

Weeks enrolled in program

Weeks in academic year

60 hours remaining in the student's program

$$\frac{\text{60 hours in program}}{\text{900 hours in academic year}} = .0666$$

900 hours in academic year

$$\frac{\text{2 weeks in program}}{\text{26 weeks in academic year}} = .0769$$

26 weeks in academic year

$$\text{Example: Annual Loan Limit Sub 4,500} \qquad 0.0666 \times 4,500 = 299$$

$$\text{Annual Loan Limit Unsub 6,000} \qquad 0.0666 \times 6,000 = 399$$

$$\text{Pell Example: Scheduled Award } \$5,850 \times .0666 \text{ (hours)} = \$389.61 \text{ } (\$389)$$

$$\text{Scheduled Award } \$5,850 \times .0769 \text{ (weeks)} = \$449.86 \text{ } (\$449)$$

In the Pell Scenario the student's award would be \$389 as that amount is the lesser of the two.

54.6 Overlapping Loan Periods

Transfer students and re-enter students are subjected to the annual loan limits. If a student transfers from another school to Pennco Tech or changes to a different program at Pennco Tech and there is an overlap of academic years, this overlap may affect the amount of loan funds the student is eligible to borrow.

An overlap in academic years exists if the academic year at the new school (or the academic year for the new program) begins before the calendar end date of the academic year at the prior school or new program. If a transfer student wishes to borrow loan funds at Pennco Tech, Administrators must print the NSLDS record and COD disbursements for the student to determine the amount of loan funds the student is eligible to receive. Students will only be awarded the difference between funds already disbursed and the amount of the annual loan limit per funding source.

54.7 Payment

Federal Direct Loan funds are disbursed in two equal amounts over the academic year. If the remaining portion of a program is equal to or less than one half of an academic year, loans will be awarded with one payment period and two disbursements within that payment period. Before disbursement a compliance computer match is run to ensure the student remains eligible for the loan i.e SAP and attendance rules for clock-hour schools. The Bursar provides students with Direct Loan receipts. These receipts explain to the student their right to cancel the loan.

54.8 Over-awards

Once the entire Federal Direct Loan proceeds have been released to the student, an over award does not exist. If however, the student becomes ineligible, a full or partial return (RT24) will be processed through FAA Access to CPS online or CampusNexus.

54.9 Recordkeeping

Financial aid records are maintained in student's files as well as in CampusNexus. Student records include the demonstration of need and Federal Subsidized Loan eligibility. The FAO Administrators are responsible for account management and appropriate security for student aid account transactions and how need was met for all aided students.

55.0 Return of Funds to the Department of Education

The Assistant Directors are responsible for preparing the Return of Funds calculation worksheet. The actual refund process (return of funds) is finalized in Pennco Tech's Business Office within 45 days after the student has ceased to maintain eligibility. (see also R2T4 section of this manual)

56.0 Processing Procedures

All eligible students will receive an Award Notification letter. The award letter must be signed in person with a Financial Aid Administrator. In order to assure timely disbursements of aid, students are encouraged to accept their signed Award Notification and submit all requested documents immediately. The student must sign a Master Promissory Note (MPN) with the Department of Education for Federal Direct Loans. Disbursement dates are listed in the student's electronic file in CampusNexus and given at the date of appointment. The Bursar offices issues students Direct Loan disbursement receipts explaining their disbursement and timeframe for their "borrower's right to cancel" the loan.

56.1 Entrance/Exit Loan Counseling

All first-time transfer and re-entry students borrowing a federal loan are required to complete entrance counseling. Entrance counseling is completed online either in the Financial Aid Office or another location convenient for the student. The Financial Aid office assists students with Entrance Counseling as per a student's request. Pennco Tech's Student Loan Counseling Department assists students with Entrance and Exit counseling as well as loan

information. For more information on Entrance and Exit counseling, please see Pennco Tech's Student Loan Counseling Department Handbook located on Pennco Tech's website.

56.2 Consortium Agreements

Due to the nature of Pennco Tech programs, Pennco Tech does not participate in consortium agreements and WILL NOT sign to be the home school for any title IV funds.

56.3 International Students

International students are not eligible for federal or state financial aid because they do not meet the citizenship requirement. International students may receive non-federal aid and are encouraged to apply for such aid.

56.4 Revision of Financial Aid Awards

Once an award letter is sent to the student, there may be instances which warrant a change to the original notification. An administrator may review a student's circumstances, make an adjustment to an award and release a revised award letter. This revised award invalidates the original award notice.

56.4(a) Revision initiated by the FAO

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

There is conflicting information in the file. There are changes resulting from verification. There is a change in availability of funds.

The award letter acknowledges the right of the FAO to make a change to any award. Notification of the change is submitted to the student for acceptance. In the case of an office error, it is customary to contact the student personally or send a personalized letter.

56.4(b) Revisions Initiated by Request from Student

Students may decline any portion of their award. Lack of acceptance does not count as a revision. If a student wants to add an award, the request will be referred to an Aid Administrator. It is the student's responsibility to notify the FAO of changes in resources. If the student makes an appointment with an Aid Administrator and reveals a change in circumstances which may affect the student's family contribution, the student should document the situation by written letter reiterating the conversation and including supportive documentation. If a change in the award is allowable, the Aid Administrator will release a revised award letter.

56.5 Over-awards

An over-award occurs any time a student's disbursed financial aid (federal, institutional, and outside aid) and other resources exceeds the cost of attendance for the award period by more than an allowable tolerance. There are certain cases when an over-award may be present on the student's account however an adjustment to certain aid sources may not be necessary. Please see each section regarding over-awards.

56.5(a) Eliminating an Over-award

Before reducing a student's aid package because of an over-award, an Administrator should always attempt to alleviate the situation by reducing or eliminating the over-award. The following possible allowance should be checked.

Adjust un-disbursed funds (all un-disbursed financial aid funds must be withdrawn in the case of an over-award).

56.5(b) Causes of an Over-award and/or Overpayment

There are several causes of an over-award:

- Reduction in cost of attendance –
- The student changes budget categories.
- Additional resources – the student has resources greater than those used to calculate the award.
- Administrative error – the Aid Administrator inadvertently makes an error.
- Fraud – the student intentionally deceives or misrepresents information to obtain funds.

56.5(c) Treatment of an Over-award

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

- Over-awards with campus based funds have a tolerance of (\$300) three hundred dollars. Determine if the student is a recipient of campus based funds.
- An over-award from an Administrative error must first reduce or eliminate next payment periods overpayment. The administrator must notify the student for any remaining amount. The student will also receive a bill from the Business Office. Once a Direct loan has been disbursed, there is no over-award. If an over-award occurs due to fraud, all federal aid will be reversed. Based on Pennco Tech's COA, an over-award is not typically common however it is necessary to address.

57.0 Return of Title IV Funds 34 CFR 668.22 (a)(1)

When a recipient of Title IV programs withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance the institution must determine the amount of Title IV program funds that the student earned as of the student's withdrawal date. Pennco Tech calculates Return of Funds based on the student's scheduled payment period hours.

There are Federal Regulations that mandate how title IV funds will be calculated when a student withdraws from school before the completion of a payment period. Students are requested, but not required, to notify the school, in writing of their intention of withdrawing.

The Financial Aid Office is required by federal statute to recalculate federal financial aid eligibility for students who withdraw (officially or unofficially), drop out, are dismissed or take a leave of absence. The federal Title IV financial aid programs must be recalculated in these situations.

If a student leaves the institution prior to completing more than 60% of a scheduled payment period, the Financial Aid Office must recalculate eligibility for Title IV funds. Recalculation is based on the percentage of earned aid using the following

57.1 Federal Return of Title IV funds formula:

Percentage of payment period completed= the number of hours scheduled to be completed up to the withdrawal date divided by the number of total hours established in the payment period. This percentage is also the percentage of aid earned.

Any break of five days or more is not counted as part of the days in the payment period.

Funds are returned to the appropriate federal program based on the percentage of unearned aid using the following formulas: If a student earned less aid than was disbursed, the institution would be required to return a portion of the funds and the student would be required to return a portion of the funds. Keep in mind that when Title IV funds are returned, the student may owe a debit balance to the institution. If a student earned more aid than was disbursed, the institution would owe the student a post-withdrawal disbursement.

Pennco Tech must offer any post-withdrawal disbursement of loan funds within 30 days of the withdraw date and make a post- withdrawal of grant funds within 45 days of the withdraw date. Pennco Tech must disburse any Title IV grant funds a student is due as part of a post-withdrawal disbursement within 45 days of the date the withdrawal was determined and disburse any loan funds a student accepts within 180 days of the date.

Pennco Tech will notify students of their post-withdrawal disbursement offer of loan funds via mail. Students will have 30 days to accept or decline the disbursement of their loan funds. Students are informed of the amount of their post-withdrawal disbursement and the source. Students are also informed of any remaining balances the loan funds could cover and that the loan funds are to be repaid. At this time the student (if a borrower) will also receive a letter explaining their obligation to complete Exit Counseling since he is no longer enrolled at the institution if the student has remaining loan debt. Pell Grant post withdraw disbursements are automatically applied to the student's account and will be applied to any institutional and non-institutional charges the student has authorized.

The institution must return the amount of Title IV funds for which it is responsible no later than 45 days after the date of the determination that the student withdrew. Return refunds are allocated in the following order:

- Unsubsidized Direct Stafford Loans
- Subsidized Direct Stafford Loans
- Federal Perkins Loans
- Direct PLUS Loans
- Federal Pell Grants for which a Return of funds is required
- Federal Supplemental Opportunity Grants for which a Return of funds is required (Federal Share only)
- Other assistance under this Title for which a Return of funds is required (e.g. IAG)

Each student who withdraws has an R2T4 calculation form completed and retained in his/her file. The Aid Administrator will also retain in the file an "attendance running sum" which indicates the students progression through the payment period(s) based on actual attendance, the scheduled hours associated with that attendance and the appropriate payment period used to calculate the students R2T4. Aid that has been disbursed will be considered based on the student's actual payment period progression and aid that could have been disbursed will be included based on applicable eligibility guidelines established by law.

Students who perfectly attend will follow Pennco Tech's "set up" disbursement schedule and payment periods. Students who need additional time to complete payment periods, will have their payment periods extended and subsequent disbursement dates rescheduled to a later date. This rule directly impacts the R2T4 process calculation and will be considered when the determination is being made in regards to the students scheduled hours, attended hours and payment period start and end dates.

Should the student reenter within 180 days, aid that has already been disbursed and retained will be calculated to determine the student's remaining eligibility (Please see Treatment of Reenters, Program Change and Transfers within this manual)

58.0 Academic Year

A fulltime academic year at Pennco Tech is 900 hours 26 weeks for day programs and 900 hours 75 weeks for evening programs. Each Academic Year consists of two payment periods of 450 hours each. A program less than the standard Academic Year but greater than one payment period will also have two payment periods, (ex: 600 hour program has two 300 hour payment periods). Likewise a program that is less than the standard academic year and equal to or less than one payment period will have one payment period. (ex: 300 hours remaining in the program is one payment period/ *note: if a student is a Direct Loan recipient two disbursements must be made within the payment period.*

58.1 Example of the Academic Year Break Down for a Given Program as it relates to Financial Aid and Payment Periods.

(Please note the Diesel Truck and Automotive Program at the Blackwood Campus are now 1800 hours. This is for illustrative purposes only)

Diesel/Truck Technology

Day School Certificate

Course__		Clock Hours
ATD 101	Fundamentals	300
DTD 101	Diesel I, Preventative Maintenance, Brakes and Hydraulics	300
DTD 102	Diesel II, Chassis and Electrical Concepts	300
DTD 103	Diesel III, Heavy Duty Drivetrain	300
DTD 104	Diesel IV, Diesel Engine Basics	300
DTD 105	Diesel V, Diesel Engine Overhauling	300
DTD 106	Diesel VI, Computer Engine Management and Air Conditioning	300

Total Program Hours: -----2100

While each course is 300 hours, the Financial Aid office will couple the hours into an academic year. The academic year(s) noted below show an example of the program hours and weeks to determine the payment periods. The Financial Aid office will obtain an accurate calendar from the Education office to determine the days and number of hours the student is intended to complete to satisfy program requirements. (Fulltime students attend 26 weeks in a 900 hour Academic Year at 34 hours per week, part time students attend 75 weeks in a 900 hour Academic Year at 12 hours per week). The Financial Aid office will count the number of hours and weeks to ensure that the student has successfully completed the number of hours and the number of weeks in a payment period before a subsequent disbursement is made. The Financial Aid office will also make sure all other student eligibility regulations are satisfied i.e. SAP, excused absences etc.

The construction of the Financial Aid Office Academic Year(s), Payment Periods and Disbursement dates is located below. The Schedule for the Academic Year, Payment Periods and Disbursement Dates is for the above program. Assuming the student started on 2/7/13 perfectly attended and is graduating on 4/25/14. 2100 Hour Day Program.

All information in regards to the student's progression in the program is estimated. Students who do not attend at the normal pace of the program may require extensions to their payment period(s). The extension is intended to provide the student with more time to complete the required clock hours in the payment period (not to exceed 150% of the program expressed in calendar time). Students that require an extension to their payment period(s) may not graduate at the time scheduled. Disbursement dates that have been scheduled prior to the student's extended payment period may also have to be rescheduled.

58.2 Academic Year, Payment Periods, and Disbursement Dates

Start Date	Grad Date	Stafford AY 1	Stafford AY 2	Stafford AY 3	Pell 2012-13	Pell 2013-14	Pell 2014-15
2/7/2013	4/25/2014	2/7/2013 To 8/13/2013	8/14/2013 to 2/24/2014	2/25/14 to 4/25/14	2/7/2013 to 5/9/2013 450 hours	8/14/2013 to 11/14/2013 450 hours	
		Disb 1- 3/11/13	Disb 1- 8/14/13	Disb 1- 2/25/14	5/10/2013 to 8/13/2013	11/15/2013 to 2/24/2013 450 hours	
		Disb 2- 5/10/13 900 Hours 26 weeks	Disb 2- 11/15/13 900 Hours 26 weeks	Disb 2- 3/27/14 300 Hours 9 weeks	450 hours	2/25/2014 to 4/25/2014 NO PELL - 300 Hours	

Academic Year 1 Payment Period(s) 34 CFR 668.4

Payment Period	Start Date	End Date	Hours	Weeks	Disbursement Date
Payment Period 1	2/7/13	5/9/13	450	13	3/11/13- DL & Pell
Payment Period 2	5/10/13	8/13/13	450	13	5/10/13- DL & Pell

Academic Year 2 Payment Period(s)

Payment Period	Start Date	End Date	Hours	Weeks	Disbursement Date
Payment Period 1	8/14/13	11/14/13	450	13	8/14/13- DL & Pell
Payment Period 2	11/15/13	2/24/14	450	13	11/15/13- DL & Pell

Academic Year 3 Payment Period(s)

Payment Period	Start Date	End Date	Hours	Weeks	Disbursement Date
Payment Period 1	2/25/14	4/25/14	300	10	2/25/14- DL 3/27/14- DL NO PELL Disbursed

Note: Academic Year 3 has one payment period and all Title IV aid is subject to proration. Pell may be disbursed in one payment however loans must be disbursed in two disbursements of equal amounts.

59.0 Disbursements 34 CFR 685.303(b)(3) 30 day delay, 34 CFR 685.301(b)(3)

Disbursements are made on a payment period basis. Pennco Tech uses formula 4 (PELL) to calculate the student's eligibility for disbursements. Pennco Tech makes the first disbursement for a student 31 calendar days after the student's attendance. Students must complete the number of hours and weeks in the previous payment period before any subsequent disbursements will be made.

59.1 Subsequent Disbursements

Subsequent disbursements will be made after the student has been deemed eligible based on student eligibility rules, Satisfactory Academic Progress Policy, and disbursement rules. In some cases students may meet the number of weeks but not the number of hours within a payment period. In this case students will not receive a subsequent disbursement until both the number of hours and weeks within the previous payment period have been successfully completed. The weeks that have accrued while the student attends to gain additional hours will be counted towards the next payment period to determine disbursement eligibility for Pell grant funds only.

59.2 Excused time and Make Up time

Students are eligible for a subsequent disbursement if the Education Department has determined that no more than ten percent of a student's scheduled time has been excused and the student is not required to make said time up. The Financial Aid Office will disburse subsequent funds to a student so long as the excused time does not exceed ten percent of the student's payment period. Any students who have unsatisfied make up time will not receive a subsequent disbursement until the weeks and hours of the previous payment period have been satisfied. For a complete description of Pennco Tech's excused absence policy, please see the catalog listed on our website and available in person at the Office of Education.

59.3 Retroactive Disbursements for Completed Periods

Pennco Tech must pay a student retroactively for any completed payment periods within the award year if the student was eligible for payment in those periods. Pennco Tech will determine if the student was eligible for a retroactive disbursement according to the rules regarding each program fund.

60.0 Treatment of Reenters, Changing Programs and Transfers

60.1 Reentry within 180 days 34 CFR 668.4(f)

A student who withdraws and reenters the same program at Pennco Tech within 180 days is treated as if he or she did not cease attendance for purposes of determining the student's aid awards for the period. A student who reenters the same program within 180 days is considered to be in the same payment period, he or she was in at the time of the withdrawal. The student retains his or her original eligibility for that payment period(s) and is treated as though he or she did not cease attendance.

Pennco Tech measures payment period progress in clock hours for enrolled students. A student who returns within 180 days of his or her original withdrawal is immediately eligible to receive all title IV funds that were returned when the student ceased attendance. Pennco Tech will restore the student's aid package and schedule the appropriate disbursements. Once the student completes the payment period that he or she has been paid, he or she is eligible for a subsequent disbursement of Title IV aid.

In cases where the student returns outside of the original loan period, Pennco Tech will extend the loan period and reschedule any pending disbursements.

Pennco Tech will Re-disburse aid that had been disbursed and then returned under the Return of Title IV aid provisions.

Pennco Tech will disburse (**AID THAT COULD HAVE BEEN DISBURSED**) to the student if/when the student is determined to be eligible for those disbursements.

Students will be charged tuition based on the difference of their reentry tuition (remaining program tuition) and tuition that was already billed for the previous payment period. (For an expounded definition of tuition charges, please see the Business office Policies and Procedures manual located on Pennco Tech's website under Consumer Information).

Aid Administrators will determine the amount of aid the student is eligible for from each funding source. Pell, Loans (Plus, Sub, Unsub) and FSEOG. Aid Administrators must check the appropriate sources for information related to awarding and disbursing (NSLDS, COD and ISIR). Students who have been withdrawn will have the appropriate R2T4 processing form in their file. Aid administrators must determine that all information is accurate on the R2T4 and the amount of aid that is re-awarded does not exceed the annual eligibility amounts; scheduled award for PELL and Direct Loan maximum borrowing limits.

*For a student who completed more than 60% of his or her training before ceasing attendance, Pennco Tech may not have returned any Title IV aid for the payment period. If the student returns within 180 days, because the student received 100% of his or her aid for that period, the student would not be eligible to receive additional Title IV aid until he or she has completes the weeks of instructional time and hours in the required payment period(s).

Cost of Attendance for Reenters within 180 days

The cost of attendance used in the calculation is the cost associated with the original period before the student withdrew. Once the student has withdrawn and then returned to the same program within a 180-day period, the student remains in the same payment period. The cost of attendance for such a student returning to the same program within 180 days must reflect the original education costs associated with the payment period from which the student withdrew.

60.2 Reentry after 180 days 34 CFR 668.4(g)

If a student withdraws from Pennco Tech without completing the payment period and reenters the same program at Pennco Tech more than 180 days after the withdrawal and received credit for previous hours attended then the student starts a new payment period when he or she reenters.

Aid Administrators must treat the hours remaining in the program as if they are the student's entire program. The number of payment periods and length of each payment period are determined by applying the rules in the appropriate part of the definition of a payment period to the hours remaining in the program upon reentry.

For the purpose of calculating payment periods *only* the length of the program is the number of clock hours and the number of weeks of instructional time that the student has remaining in the program he or she reenters. If the remaining hours and weeks constitute half of an academic year or less, the remaining hours constitute one payment period.

Typically clock hour students who repeat a term are ineligible for financial aid funds for that repeated term, however students who reenter after 180 days may have a repeat term included in their packaging provided that they have the available Title IV funds.

EXAMPLE: Student withdraws after completing 302 hours of a 900 clock-hour program. The student has 148 hours remaining in a 450 hour payment period. The student reenrolls after 180 days in the same program and receives credit for all 302 hours completed.

The program length for purposes of determining the new payment periods is 598 clock hours, the new payment period hours are 299 and 299. Students attending fulltime, attend Pennco Tech at 34/35 hours per week. To determine the weeks in the payment period Aid Administrators must divide the number of hours remaining in the program by the number of scheduled hours per week (34/35 hours). This student's weeks

would be 18. The payment periods would be 299 hours each and 9 weeks. The student would not be eligible for a subsequent disbursement until after the first 299 hours and 9 weeks have been completed.

Any reduction in the student's awards would be based on whether the student's scheduled award or annual loan limits are exceeded (overlapping loan periods or PELL disbursed at Pennco Tech or another institution). Aid Administrators must calculate disbursement dates based on the student completing the number of weeks and hours within the previous payment period before scheduling a subsequent or second disbursement.

When the student's remaining hours are less than a scheduled academic year (900 hours) administrators must prorate the student's eligibility for awarding purposes.

This student if Grade Level 1- Dependent, would be as follows:

LOANS

LOANS ARE ORIGINATED IN TWO EQUAL DISBURSEMENTS FOR THE TOTAL AMOUNT.

DEPENDENT MAX ANNUAL AWARD \$5,500

DIRECT SUBSIDIZED LOAN \$3,500 Prorate: $3500 \text{ divided by } 900 \times 598 = 2,325$ two disbursements 1163/1162

DIRECT UNSUBSIDIZED LOAN \$2,000 Prorate: $2000 \text{ divided by } 900 \times 598 = 1,328$ two disbursements 664/664

*If the student is eligible for additional unsubsidized loan funds based on a parent plus denial then the unsubsidized eligibility would be \$6,000 instead of \$2,000 and standard prorating rules would apply.

PELL (Formula 4)

Scheduled Award (if zero EFC) 5,645

$5,645 \text{ divided by } 900\text{hours} \times 598\text{hours} = 3,750$ (1875/1875) and $18\text{weeks}/26\text{weeks} = .6923 \times 5645 = 3908$ (1954/1954)

Aid Administrators must use the lower of the two, which would be 3750. In most cases the hours is the lower amount, however it is necessary to calculate both the weeks and the hours to determine the correct amount to award.

Cost of Attendance for Reenters after 180 days

The cost of attendance used in the calculation is the cost associated with the reenter period (after 180 days of LDA). Once the student has withdrawn and then returned to the same program after the 180-day period, the student's academic year and payment period(s) are calculated based on the remaining hours in the student's program. The cost of attendance for such a student returning to the same program after 180 days must reflect the reenter educational costs associated with the reenter academic year and payment periods. As noted above, any hours remaining less than an academic year requires all aid to be prorated based on that amount, it is the same process for the Cost of Attendance. The Cost of Attendance must be prorated based on the components and the number of months the student is actually enrolled. Campus Based Funds and Direct Loans must follow the prorated EFC and COA, while PELL will have a scheduled 9 month EFC and COA.

60.3 Change in Program

Students who change programs are treated as new students. Due to the nature of Pennco Tech programs, no one program is identical to the other. Students who change programs and have already received disbursed financial aid for an award year are subject to the remaining eligibility based on previous disbursed funds. Students are encouraged to consult with the Education Department to determine how changing programs will affect their enrollment status and hours earned. The Financial Aid Office does not determine the amount of hours acceptable as credit towards other programs. The Education Department will consult with students to determine any hours applicable towards other programs (if any).

60.4 Transfers

Applicants with previous comparable training may be admitted with advance standing. Any determination for advance standing is requested through Pennco Tech's Education Department. Students who transfer to Pennco Tech will be subjected to their remaining annual award eligibility at Pennco Tech and placed on NSLDS transfer monitoring process for a period of time. The Financial Aid Office will determine the student's remaining eligibility by checking COD and NSLDS for awards and disbursed aid. Any hours that a student receives as a result of transfer credit will be used in the calculation to determine the necessary remaining hours in the program for awarding and packaging purposes. Students will only be packaged for hours necessary to complete their program.

61.0 Resolving C-Codes (Abridged)

Aid Administrators are required to review the students Institutional Student Information Record (ISIR) for any comment codes and SAR c-flags. The student's ISIR and SAR list comment codes pertaining to the student's FAFSA after it has been processed. While some comment codes are for informational purposes, other comment codes are flagged and require an adequate resolution. Pennco Tech has developed a SAR C-Flag Resolution Form. The form is intended to assist Administrators in resolving the c-flag properly and according to Department of Education standards.

Aid Administrators are required to properly document the form, noting all comment codes with c-flags and how those flags were resolved. Administrators must attach all documentation used to resolve the flag and retain that information in the file. This manual cannot provide every c-flag that requires resolution. Some common c-flags are listed below. For a more comprehensive look at comment codes and how to resolve them please review the 2019-2020 SAR Comment Code and Text manual provided by the Department of Education.

61.1 Common SAR C-flags that Require Resolution (See SAR Comment Code and text for code number)

- Selective Service
- DHS Primary and Secondary Match not determined (Eligible non-citizen)
- Social Security Administration (US Citizen match not found)
- Department of Veteran's Affairs
- Department of Defense
- Unusual Enrollment History
- NSLDS Codes
 - ❖ Active Bankruptcy
 - ❖ Discharged Loans
 - ❖ Default
 - ❖ Overpayment
 - ❖ Over Loan Aggregate
 - ❖ Name/Social Security Number Mismatch
 - ❖ PELL Lifetime Eligibility Used

While the aforementioned comment codes may be listed on the student’s ISIR it does not necessarily mean that the comment code is legitimate. Students and parents sometimes make errors on their FAFSA application while completing it. Students and parents may transpose numbers, list parent information where student information may be requested or have hyphenated names that are not recognized through the specific database matches. In those particular cases Administrators must determine the information that must be corrected, have the student correct the FAFSA and submit it back through the Central Processing System to resolve the c-flag.

62.0 Satisfactory Academic Progress (SAP) Policy for Financial Aid Programs

Federal law and regulations require that all students receiving financial aid maintain Satisfactory Academic Progress (SAP) according to both qualitative and quantitative measures. The following policy represents the standards adopted by Pennco Tech’s Financial Aid Office and applies to all students receiving financial aid, including Federal Direct Stafford Student Loans. Students enrolled in a program of more than two academic years must have a Grade Point Average (GPA) of at least a “C” or its equivalent or must have an academic standing consistent with Pennco Tech’s graduation requirements. Students should visit the Education Department to inquire about their SAP status and requirement.

62.1 Conditions for meeting Satisfactory Academic Progress Policy

Students must meet all components associated with Satisfactory Academic Progress. Students must maintain a grade point average of at least 70% (Qualitative Measure), A Pace of at least 66.66% (scheduled Clock Hours/weeks Completed for the Payment Period (Quantitative)), and Maximum Timeframe (completing the program within 150% of the established program length as it relates to calendar time). Students fail the maximum timeframe component when it becomes mathematically impossible to complete the program within 150% of the published program calendar length timeframe. The Financial Aid Office will notify students via written letter format regarding their SAP status when failing one or more of the aforementioned SAP components. Pennco Tech does not have an appealing process to assist students in regaining Title IV eligibility after failing Maximum Timeframe Standards. Students may consult the Education Department to determine the necessary steps required to complete their academic program.

Students are required to complete 70% of the hours/weeks within a given payment period to maintain their required pace. Students will be checked for both completed hours and weeks as it pertains to SAP. (* Although a student may be making Satisfactory Academic Progress, the student may not be eligible to receive a subsequent disbursement until the total number of hours and weeks are completed for the previous payment period. For a complete description regarding subsequent disbursements, please see the disbursement section of this manual).

62.2 Grading System

90-100%	4.0
80-89%	3.0
70-79%	2.0
60-69%	1.0
Below-60%	Failure

62.3 Required Completion Rate

Clock Hours Per Program

Hours	Weeks
2100	60
1800	52
1200	34
1200(evening)	100
960 (evening)	80
960 (Day)	28
900	26
900(evening)	75
600	18
600(evening)	50

Maximum Timeframe to complete a Program

Hours	Weeks
2100	90
1800	78
1200	51
1200	150
960	120
900	42
900	39
900	113
600	27
600	75

*While a student's Maximum Timeframe is calculated based on the number of weeks it takes the student to complete the program, the student is not eligible to receive additional financial aid funds for more hours than required for the program. With the exception of a re-enter student who enters Pennco Tech after 180 days from separating from the institution the Financial Aid Office cannot pay funds to a student for repeat course hours.

62.4 Pace

Pennco Tech evaluates pace as the students attended time compared to that which is scheduled. If the attended hours are equal to that of a completed payment period, the student's SAP calculation is reviewed. The student will be reviewed for SAP as noted below. Students who repeat a previously completed course will have the amount of time that it takes to complete the repeated term factored into their Maximum Timeframe standing. Students must be mindful of the number of repeated courses included in their current program as it can affect whether or not the student is able to complete the program on time.

62.4(a) Example of Pace

At 450 attended hours 600 scheduled hours elapsed

$$450/600 = 75\%$$

Expressed in Calendar time

$$15 \text{ weeks}/20 \text{ weeks} = 75\% \text{ (Both items checked according to Maximum Timeframe)}$$

***Next SAP review is at 900 attended hours (if the student is in an academic program that is longer than one academic year)**

62.5 Financial Aid Warning

In order for students in a clock-hour program to receive financial aid, they must maintain Satisfactory Academic Progress toward completion of their degree or certificate. Satisfactory progress is evaluated at the point when the student has attended all required clock hours in the payment period. If satisfactory progress is not achieved at the end of the payment period, students will automatically be placed on **Financial Aid Warning**.

At the end of each payment period, the student's cumulative grade point average will be determined as well as the students pace of completion. Students who do not achieve a cumulative grade point average of 70% or a Pace of Completion of 66.66% at the end of the payment period will be placed on Financial Aid Warning for one subsequent payment period. During this warning period, the student will receive any financial aid funds due to him. If the cumulative grade point average is less than 70% or the pace of completion is less than 70% after the **Financial Aid Warning** payment period, the student's financial aid will be terminated. If the student

satisfactorily completes the Financial Aid Warning period based on the standards, the student remains eligible for future financial aid funds.

Pennco Tech's Financial Aid Office does not have an appealing process for failing Satisfactory Academic Progress. Students not making SAP for financial aid programs will be required to pay for any additional courses they are scheduled to complete from their own resources. If the student achieves SAP on his/her own, then the student regains eligibility for ALL financial aid programs. Students must visit the Financial Aid Office to inquire about their Satisfactory Academic Progress status and confirm if the successful completion of a course has enabled them to regain Title IV eligibility; breaks in enrollment or the absence of attending does not assist the student in regaining Title IV eligibility.

62.6 Incompletes and Satisfactory Academic Progress

Students who receive an incomplete "I" for any course that is included in their current program will have the incomplete averaged into their cumulative GPA standard. The "I" will affect the student's GPA standing similar to the effect of receiving a zero for the course. Hours achieved from the grade of Incomplete are counted in the student's attempted hours and completed; this will affect the student's pace of completion. Students are advised to visit the Education Department to determine how to convert the incomplete grade. Students must notify the Financial Aid Office when a grade of incomplete has been changed.

62.7 Satisfactory Academic Progress Review for Conflicting/New Information

In all cases the Financial Aid Office must recheck Satisfactory Academic Progress when new information has been received or previous information has been changed. The Financial Aid office will contact the student in written letter format to inform the student of any current or changed information regarding the student's SAP status due to any updates affecting the student's academic record. Students who are unsure of their academic standing in their program must contact the Education Department to resolve any discrepancies or issues.

62.8 Transfer Hours and Satisfactory Academic Progress

Only transfer credits that count toward the student's current program are counted (as both attempted and completed hours). Students who receive credit for transfer hours in their current program are not eligible to receive financial aid funds for the course that those transfer hours have satisfied. The student is not eligible to be paid additional financial aid funds or receive additional time for the already completed course as it relates to Maximum Timeframe standards.

63.0 Enrollment Reporting

Pennco Tech is required to report the enrollment status of every student receiving Title IV aid to the National Student Loan Data System (NSLDS). This enrollment information is merged into the NSLDS database and reported to guarantors, lenders, and servicers of student loans within 15 days of receiving the report. This is completed via the Student Status Confirmation Report (SSCR).

Pennco Tech receives the Enrollment Report through EdConnect (a Federal System) every other month. Once received a response, it is exported into our CampusNexus system. The file will render any errors that are associated with the student's enrollment and program information. Should there be any errors associated with the student's record the record must be reviewed and/or corrected for accuracy via the Academic Processor with the assistance of the FA Administrator.

The Academic Processor/ FA Administrator will manually update any students with errors on the NSLDS website to ensure timely reporting. Once every student's status is updated and submitted without errors successfully, the process is complete. This process is pertinent to the student's loan status and program status. Students must be updated on a regular, timely basis so that the most accurate information is used regarding guarantors, lenders, and servicers.

**New for 2020-2021*

64.0 HEROS ACT

The Higher Education Relief Opportunities for Students (HEROES) Act provides for the modification and waiving of some statutory and regulatory provisions related to students who receive financial aid and who are on active duty during a war or other military operation or who reside or are employed in a declared disaster area. These adjustments apply to return of funds and signature requirements for verification and application, among other things. The most recent Other Mandated Disclosures 56 update to the HEROES Act authorized its provisions through September 30, 2017. See pages 59311–59318 of the Federal Register dated September 27, 2012, for the details on the act and a list of the eligible students.

65.0 CARES ACT

The Coronavirus Aid, Relief, and Economic Security Act (H.R. 748), also known as the CARES Act is a law meant to address the economic fallout of the COVID-19 pandemic across the United States. Pennco Tech has created their own Policy and information in regards to the Higher Education Emergency Relief Fund (HEERF). Each eligible student received a text message via Omni-alert, as well as an email sent directly to their Pennco Tech email for identity verification requirements. The process is a two-step procedure for the student. Each student was to review the student acknowledgment form and then sign and accept the calculation methodology. Once the student accepts the formula, Pennco Tech receives the acknowledgement form back and enters the students Pennco Tech ID number, along with their specific eligible grant allotment. As each students individual amount with vary based on need. Once the student has signed for the second time, the Business Office receives the form, signs off on the amount and enters the check number affiliated with the delivery of the credit. All Pennco Tech staff has been informed to assist in counseling the eligible students appropriately. All COVID-19 information and HEERF data has been placed on Pennco Tech's Website, and is updated periodically.

65.1 COVID-19 HIGHER EDUCATION EMERGENCY RELIEF FUNDS (HEERF) STUDENT ALLOCATION METHODOLOGY

Statue S.3548 - Coronavirus Aid, Relief, and Economic Security Act or the “CARES” Act.

The CARES Act Higher Education Emergency Relief Fund (HEERF) provides funding to Institutions of Higher Learning (IHL). Offering financial aid grants to students whose lives, and education, have been impacted negatively due to the COVID-19 Pandemic. Many students, and their families, are currently encountering financial difficulties and challenges, while struggling to make ends meet.

The key purpose for the HEERF is to assist students that have been affected by the Coronavirus (COVID-19) and help with **their expenses related to the disruption of campus operations**. Clearly stipulated in the Recipient’s Funding Certification and Agreement for Grants to Students. These expenses consist of food, housing, course materials, technology, health care, and child-care expenses.

Pennco Tech has been tasked by the federal government to facilitate the disbursement of the HEERF funds. Our institution considers our students to be the lifeblood to the communities we support. For this reason, the management of Pennco Tech vows to administer this program professionally and practically. To maximize the impact of this benefit in a manner that's both efficient and fair, Pennco Tech will distribute the funds using an objective, needs-based methodology.

Pennco Tech’s aspiration for the student allocation HEERF is to promote access and success for students who might not otherwise be able to afford their postsecondary education post pandemic. Since our belief coincides with the government's goals for this program, our administration supports the awarding "based on need" approach to be the most reasonable and objective way to distribute the funds. The institution has determined how the grants will be disseminated to the students, the calculated amount of each student grant, and has developed instructions to help guide the students through this process. *Please see Attachment “A” for an example in this policy.*

Financial need generally refers to financial support for IHL, it is awarded based on student or family income, household size and number in college. In this case, the Free Application for Federal Student Aid (FAFSA) generates the Expected Family Contribution (EFC) number, calculated by the methodology within an application. Amongst each individual federal application, there are greater degrees of variation in need-based aid that will occur. For determining the individual grant apportionment, our students' EFC will be incorporated as the first criteria of eligibility.

When students make a commitment to an institution of higher learning, another factor that determines the level of financial resources needed is the length of their chosen program. To incorporate this factor, program length (in hours) will be the second criteria of eligibility used for determining grant apportionment.

With criteria selected for the grant determinations, Pennco Tech derived a formula to factor both data points belonging to each student and compute a final value depicting the students grant eligibility. This formula was carefully derived based on a points system. Because Pennco Tech's two campuses were assigned funds from this program separately, each student’s campus location will be the third and last factor impacting the value of their grant.

Each student will be categorized by their EFC, their current program length and campus location. The EFC is broken down and grouped into levels of 700, each group will be assigned a point value with ten (10) being the maximum allotted amount of points (the student body group with largest need). Each program has a required amount of clock hours that must be completed, along with academic criteria, for program completion. Each program will be assigned a point based on the length and amount of clock hours, six (6) being the highest amount of points.

Pennco Tech understands that the HEERF is not considered Title IV, but is aware that only students who are eligible to participate in programs under Section 484 in Title IV of the Higher Education Act of 1965, as amended (HEA), may receive their portion of the emergency financial aid grant. The criteria to partake in programs under Section 484 of the HEA include but are not limited to the following: U.S. citizenship or eligible noncitizen; a valid Social Security number; registration with Selective Service (male students only); and a high school diploma, GED, or completion of high school in an approved homeschool setting.

ATTACHMENT 'A'

EFC (\$)	POINTS TIER
0 – 999	10 points
1000 – 1999	9 points
2000 – 2999	8 points
3000 – 3999	7 points
4000 – 4999	6 points
5000 – 5999	5 points
6000 – 6999	4 points
7000 – 7999	3 points
8000 – 8999	2 points
9000 – 9999	1 point
10,000 +	0 points

PROGRAM LENGTH (Hours)	POINTS TIER
600	1
960	2
900	3
1200	4
1800	5
2100	6

65.2 Bristol Student Allocation: \$333,987

Bristol Points System Example:
Active Students enrolled
Air Conditioning, Refrigeration and Heating (HVAC) Program:
Day Program:
1200 Hours – Four (4) points

EFC POINTS	PROGRAM POINTS	TOTAL POINTS PER STUDENT
Student A: 10 pts for EFC	→ 4 pts for program length	14 points total
Student B: 3 pts for EFC	→ 4 pts for program length	7 points total
Student C: 5 pts for EFC	→ 4 pts for program length	9 points total
Student D: 8 pts for EFC	→ 4 pts for program length	12 points total
Student A: 4 pts for EFC	→ 4 pts for program length	8 points total
Student B: 1 pts for EFC	→ 4 pts for program length	5 points total
Student C: 2 pts for EFC	→ 4 pts for program length	6 points total
Student D: 6 pts for EFC	→ 4 pts for program length	10 points total

Evening Program:
960 Hours – Three (3) points

EFC POINTS	PROGRAM POINTS	TOTAL POINTS PER STUDENT
Student A: 5 pts for EFC	→ 3 pts for program length	8 points total
Student B: 10 pts for EFC	→ 3 pts for program length	13 points total
Student C: 6 pts for EFC	→ 3 pts for program length	9 points total
Student D: 9 pts for EFC	→ 3 pts for program length	12 points total
Student A: 2 pts for EFC	→ 3 pts for program length	5 points total
Student B: 4 pts for EFC	→ 3 pts for program length	7 points total
Student C: 5 pts for EFC	→ 3 pts for program length	8 points total
Student D: 1 pts for EFC	→ 3 pts for program length	4 points total

ATTACHMENT 'A' Continued

65.3 Blackwood Student Allocation: \$489,827

Blackwood Points System Example:
Active Students enrolled
Automotive Technology Program:
Day Program:
1800 Hours – Five (5) points

EFC POINTS	PROGRAM POINTS	TOTAL POINTS PER STUDENT
Student A: 10 pts for EFC	→ 5 pts for program length	15 points total
Student B: 3 pts for EFC	→ 5 pts for program length	8 points total
Student C: 5 pts for EFC	→ 5 pts for program length	10 points total
Student D: 8 pts for EFC	→ 5 pts for program length	13 points total
Student A: 4 pts for EFC	→ 5 pts for program length	9 points total
Student B: 1 pts for EFC	→ 5 pts for program length	6 points total
Student C: 2 pts for EFC	→ 5 pts for program length	7 points total
Student D: 6 pts for EFC	→ 5 pts for program length	11 points total

Evening Program:
1200 Hours – Four (4) points

EFC POINTS	PROGRAM POINTS	TOTAL POINTS PER STUDENT
Student A: 5 pts for EFC	→ 4 pts for program length	9 points total
Student B: 10 pts for EFC	→ 4 pts for program length	14 points total
Student C: 6 pts for EFC	→ 4 pts for program length	10 points total
Student D: 9 pts for EFC	→ 4 pts for program length	13 points total
Student A: 2 pts for EFC	→ 4 pts for program length	6 points total
Student B: 4 pts for EFC	→ 4 pts for program length	8 points total
Student C: 5 pts for EFC	→ 4 pts for program length	9 points total
Student D: 1 pts for EFC	→ 4 pts for program length	5 points total

In conclusion, the entire student body population eligible for the HEERF grant will generate points base on need, and program length. Active students enrolled at Pennco Tech are scored in the same manner as the above examples. The total points awarded to **ALL** of Pennco Tech's students is determined. By dividing the amount of HEERF funds by this grand total of points, we are able to establish how much each point is worth in terms of grant money. With this "per point" value, we can establish the grant funds assigned to each student, multiplying by number of points scored. Based off this calculation, each individual student will collect the appropriate grant amount based on their financial need. *See Attachment 'B'.*

ATTACHMENT 'B'

65.4 Bristol Example:

Total student body roughly 300 students.
Approximately 7 points per student.

$$300 \times 7 = 2,100$$

$$\$333,987 / 2,100 = \$159.00 \text{ per point.}$$

Student 'A' (HVAC day program) = 14 pts

$$\$159.00 \times 14 = \$2,226.00$$

Student 'A' will be awarded a total grant of \$2,226.00 based on his/her need.

Student 'A' (HVAC evening program) = 8 pts

$$\$159 \times 8 = \$1,272.00$$

Student 'A' will be awarded a total grant of \$1,272.00 based on his/her need.

65.5 Blackwood Example:

Total student body 450 students.
Approximately 10 points per student.

$$450 \times 10 = 4,500$$

$$\$489,827 / 4,500 = \$109.00 \text{ per point.}$$

Student 'A' (auto tech day program) = 15 pts

$$\$109.00 \times 15 = \$1,635.00$$

Student 'A' will be awarded a total grant of \$1,635.00 based on his/her need.

Student 'A' (auto tech evening program) = 9 pts

$$\$109.00 \times 9 = \$981.00$$

Student 'A' will be awarded a total grant of \$981.00 based on his/her need.

Disclaimer: The mathematical data provided above within this policy is for illustrative purposes only and should not be relied upon as an accurate indication of financial need. As each individual's circumstance is different, the results will vary and these statistics are not intended to reflect factual values of the points system, student enrollment numbers or the HEERF grant. We do not pledge that these calculations are accurate or complete.

66.0 Higher Education Emergency Relief Funds (HEERF) Actual Data

DESCRIPTION	Original Allocation	06.17.2020	06.17.2020	Amount Disbursed to date	Remaining Funds
Bristol HEERF Grant Student Allocation	\$333,987			\$313,314.41	\$20,672.59
Bristol Students Eligible for HEERF Grant	314				
Bristol students who received HEERF Grant to date	0	293			
Bristol Points	3,312				
Bristol Grant Per Point	\$100.84		\$29,546.12		
Blackwood HEERF Grant Student Allocation	\$489,827			\$337,147.00	\$152,680.00
Blackwood Students Eligible for HEERF Grant	447				
Blackwood students who received HEERF Grant to date	0	313			
Blackwood Points	4,777				
Blackwood Grant Per Point	\$102.54		\$32,095.02		
	TOTAL:	<u>606</u>	<u>\$61,641.14</u>	<u>\$650,461.41</u>	<u>\$173,352.59</u>

Updated 08/25/2020 – D.K.

1. Final Revision 08/25/2020
2. Changes
 - a. New form for Parent Plus Loan Override
 - b. New Form for Unaccompanied Homeless Youth
 - c. Flexibilities for COVID-19
 - d. HEROS Act
 - e. CARES Act
 - f. Higher Education Emergency Relief Funds (*HEERF*) Information and Methodology
 - g. HEERF DATA