COMMUNITY AND TECHNICAL COLLEGES
Washington State Board

SBCTC Financial Aid Policies & Procedures Manual

April 2026

Contents

Section 1: Manual Introduction

1.1 Overview

This centralized manual was developed by the Washington State Board for Community and Technical Colleges (SBCTC) in 2025 to support consistent, compliant, and student-centered administration of financial aid across all 34 community and technical colleges. It is intended for implementation beginning with the 2026–2027 academic award year and will be updated annually in preparation for each upcoming award cycle.

The administration and oversight of federal, state, and institutional financial aid is a shared responsibility across JP and is not limited solely to the Financial Aid Office. Effective financial aid administration requires coordinated involvement from multiple departments, including but not limited to academic affairs, admissions, registrar, business/finance, information technology, and institutional leadership. Each area plays a critical role in ensuring compliance with applicable regulations, accurate data reporting, timely communication, and the appropriate stewardship of financial aid funds.

Well-developed Financial Aid Policies and Procedures (P&Ps) serve as more than a compliance resource; they are a strategic tool for the institution. P&Ps support onboarding and training by providing new staff with clear, consistent guidance on regulatory requirements and institutional practices. When used intentionally, Financial Aid P&Ps promote consistency, collaboration, and compliance across the institution.

They also facilitate effective communication with campus partners, helping departments understand their roles, timelines, and shared responsibilities in the administration of financial aid. For institutional leadership, P&Ps offer transparency into operational controls, decision-making authority, and risk management, supporting informed oversight and accountability.

Portions of this Financial Aid Policies and Procedures Manual incorporate or adapt language from the Federal Student Aid Handbook and other official U.S. Department of Education resources; state guidelines; or institutional policies. Such content is used for informational and compliance purposes and reflects guidance available at the time of writing.

In the event of any conflict between this manual and federal or state statutes or regulations or institutional policies, the applicable federal, state or institutional regulations shall govern. These policies and procedures are reviewed periodically to ensure continued alignment with current federal, state and institutional guidance. Revisions to the manual throughout the year will be incorporated as needed by the SBCTC Financial Aid Services team in collaboration with JP Financial Aid Administrators (FAA).

All significant updates are reviewed and approved by the Policy Associate for Financial Aid at SBCTC, with input from systemwide stakeholders to ensure the policies and procedures reflect regulatory requirements, operational needs, and the diverse experiences of students served throughout the state.

1.2 Purpose & Scope

Purpose

Federal regulations mandate that institutions have written policies and procedures (Higher Education Act of 1965 (HEA), as amended). Beyond the federal requirement, there are many benefits to having a written document outlining the Financial Aid Office's policies and procedures:

- For the Financial Aid Office staff, as a referral guide to assist in maintaining consistency in the problem-solving process.
- As an important component of a comprehensive training program.
- For others, as a guide to understanding the complexity and operation of the Financial Aid Office

The purpose of the SBCTC Financial Aid Policies & Procedures Manual is to provide financial aid staff across Washington's 34 community and technical colleges ("the system") with a comprehensive and unified framework of policies and procedures required to administer all sources of financial aid in a compliant, equitable, and effective manner.

These policies and procedures are aligned with the mission and objectives of the Washington State Board for Community and Technical Colleges, and support system-wide accountability, student access, and fiscal integrity.

This manual also serves as a guiding resource during compliance audits, federal and state program reviews, and internal process evaluations. It is intended to promote consistent practices while accommodating the diverse needs of individual colleges within the system.

By following the procedures outlined in this document, JP will maintain compliance with federal requirements, minimize financial aid errors, and enhance the quality of service to our students.

If no policy or procedure exists for a given issue, the Financial Aid Office staff, in consultation with the JP of Financial Aid, is expected to use professional judgment based upon the intent of all financial aid programs and office practices.

JP

SBCTC Financial Aid

SBCTC provides statewide leadership in financial aid strategy, regulatory compliance, data reporting, and system-wide coordination.

The SBCTC Office of Financial Aid Services is housed within the Student Services division. It reports to the Director of Student Services and K12 Alignment, who in turn reports to SBCTC executive leadership. This centralized office provides system-level oversight, compliance guidance, and operational support to the financial aid offices at all 34 community and technical colleges in Washington.

To maintain compliance with federal regulations and uphold strong internal controls, the SBCTC system structure ensures a clear separation of duties between aid authorization and the disbursement or delivery of funds. No single individual or office has sole authority over both functions for any student receiving Title IV funds, ensuring an adequate system of internal checks and balances across the system.

Colleges rely on SBCTC for centralized guidance, system-wide policy development, and coordination with state and federal agencies. This shared governance and operational model ensures that colleges uphold consistent standards, remain responsive to regulatory changes, and maintain institutional autonomy.

Scope

Many factors support the creation of a written policies and procedures manual for a school's participation in the Federal Student Aid programs, such as:

- Compliance with U.S. Department of Education regulations.
- Appropriate offices within an organization work from the same starting point.
- Mutually agreed upon and understood framework for thoughtful, conscientious, and consistent implementation of any organization-wide activity.
- Documentation of how and when the school establishes specific policies and procedures.
- A valuable reference during a program review or audit.

This all-inclusive Policy and Procedure manual is critical to establishing internal controls and ensuring effective and efficient operation of a school's FSA programs. This manual's intent is to:

- Provide a single location for JP Financial Aid Policies and Procedures.
- Provide Financial Aid Office staff with information about current policies and procedures that pertain to eligibility assessment for federal, state, and institutional programs.
- Provide Financial Aid Office staff with general and specific responsibilities as they pertain to the office's daily functions, their individual responsibilities, and the office's relationship to other departments/divisions of the institution.
- Provide the Financial Aid Office with general office procedures in order that a systematic and consistent approach may be taken in the operation of all financial aid programs, ensuring that similar operations will be handled in a uniform manner.
- Provide the basis for orientation and training of new Financial Aid Office staff and refresh the skills of current Financial Aid Office staff.
- Provide important information to other JP staff who may have reason to use or review the information contained in this manual.

1.3 Code of Conduct

The Higher Education Opportunity Act (HEOA) requires educational institutions to develop and comply with a code of conduct that prohibits conflicts of interest for financial aid personnel (HEOA 487(a)(25)). Therefore, an SBCTC financial aid professional is expected always to maintain professional ethics that encompass the personal and organizational standards of behavior expected of professionals who exercise specialist knowledge and skill.

The Financial Aid Office at JP abides by the National Association of Student Financial Aid Administrators' (NASFAA) Code of Conduct. NASFAA's Code of Conduct is focused on ensuring that aid administrators:

- Not take to action for their personal benefit, or that could be perceived as a conflict of interest;
- Provide information that is accurate, unbiased, and does not reflect preference arising from actual or potential personal gain;
- Provide institutional financial aid offer notifications (and accompanying materials) that give students clear and transparent outlines of financial aid and costs;
- Display consumer information in a prominent location on the institutional web site(s) and in any printed materials, easily identified and found, and labeled as "Consumer Information:" and
- Disclose to their institution any involvement with, interest in, or potential conflict of interest with any entity with which the institution has a business relationship.

1.4 SBCTC Staff Mission and Values

SBCTC is governed by a nine-member, governor-appointed board responsible for administering the Community and Technical College Act and providing leadership and coordination for Washington state's system of 34 public community and technical colleges.

State Board Vision

Leading with racial equity, our colleges maximize student potential and transform lives within a culture of belonging that advances racial, social, and economic justice in service to our diverse communities.

We are committed to building a culture of diversity, equity and inclusion (DEI).

SBCTC's organizational strength grows out of the combined commitment to a shared mission and values as we carry out the Board's vision. SBCTC staff members are proud to carry out the Board's vision using innovative and creative leadership. We experience personal and professional fulfillment and view our success through the collective accomplishments of the system.

Our organizational strength is captured in our spirit and motivation as we commit to accomplish the vision of the Board by embracing these missions and values.

Mission

We challenge, empower and embolden ourselves and our colleges to deliver equitable higher education through antiracist policies that ensure economic vitality across Washington.

Values
Racial Equity and Social Justice
We courageously advocate for an inclusive environment that ensures an antiracist and intersectional approach to racial equity and social justice.

Accountability
We're driven by our vision; our values are more than words. We are answerable for our work, and to all it informs and impacts.

Community and culture building
We value the diverse voices and live experiences of those we work with and serve. We build a culture of belonging where people can be their authentic selves while growing personally and professionally.

Service
We serve one another and the college system with transparency and respect. Our service is responsive, accurate, efficient, and sincere.

Humor
Humor feeds our connection and motivates us as we do the work of serving our colleges. We value the ability to grow, laugh, and enjoy each other.

Collaboration
We build upon the strengths and gifts of every employee and our partners to collaboratively uplift our students and colleges, while responding to the needs and challenges facing the system.

Innovation
We are flexible, inquisitive, and creative learners who bring curiosity and openness to all that we do.

1.5 Financial Aid Office Philosophy

The Financial Aid Office functions as an integral part of JP, dedicated to supporting JP mission, vision, and strategic goals. JP understands the importance of having a comprehensive array of student financial assistance programs available for students.

By developing strong collaborative relationships with other departments, the Financial Aid Office works to effectively meet the regulatory requirements of the programs we oversee, ultimately enhancing the student experience. Each program available to students has a unique set of administrative rules and regulations that must be followed in order for JP to remain a participant in good standing in all student aid programs.

JP Financial Aid Office takes this role very seriously and strives to manage the programs in accordance with the spirit of the policies, to stay well-informed of regulatory changes, to provide ongoing training to Financial Aid Office staff, and to create an environment that ensures JP remains in compliance and eligible to continue as a participant in all student aid programs.

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1.6 System Financial Aid Organization Overview

SBCTC oversees and supports the financial aid operations of Washington's 34 community and technical colleges, each serving unique student populations and community needs. While financial aid services are administered locally at each college, SBCTC provides the structure, resources, and statewide coordination necessary to ensure consistency, compliance, and equity across the system.

- SBCTC website
- SBCTC Paying for College Financial Aid Website
- SBCTC Financial Aid Policy Email: FinancialAidPolicy@sbctc.edu

SBCTC Executive Leadership

- Nate Humphrey, SBCTC Executive Director
- Joyce Hammer, Deputy Executive Director, Education Division
- Grant Rodeheaver, Deputy Executive Director, Information Technology Division
- Choi Halladay, Deputy Executive Director, Business Operations Division

SBCTC Financial Aid-Related Staff

- Jamie Traugott, Director of Student Services and K12 Alignment
- Jessica Perez, Financial Aid Policy, Compliance, and Opportunity Grant (OG)
- Laura Coghlan, Program Administrator, Student Emergency Assistance Grant (SEAG) and Supporting Students Experiencing Homelessness (SSEH)
- Christine McMullin, Policy Associate, Student Emergency Assistance Grant (SEAG) Program and Supporting Students Experiencing Homelessness (SSEH)
- Dylan Jilek, Interim Program Administrator, WorkFirst
- Sheila Acosta, Program Administrator, Basic Food, Employment and Training (BFET) Program
- Jennifer Dellinger, Policy Associate, WorkFirst and BFET
- Shanna McBride, Program Administrator, Worker Retraining Program
- Anna Olson, Policy Associate, Worker Retraining Program
- Megan Harper, Program Administrator, Early Achievers Grant (EAG).
- Nicole Daughtry, Policy Associate, Ability to Benefit (ATB), Basic Education for Adults (I-BEST)
- Chastity Pennington, Interim Director, Corrections Education
- Dani Rider, Assistant CIO for ctcLink Support
- Ana Ybarra, Director, ctcLink Financial Aid Support
- Brandon Reed, Director, ctcLink Student Financials Support and Student

Financials
- Jackie Thoms, PeopleSoft Business Analyst - Financials

Community and Technical Colleges
Each of the 34 community and technical colleges maintain their own campus-based financial aid office to deliver personalized services and ensure timely and accurate offering of all eligible financial aid programs.

Each college's Financial Aid Office is staffed by qualified professionals responsible for the direct delivery of aid to students. All colleges operate under a shared set of policies and procedures aligned with federal and state financial aid regulations and supported by a unified system (ctcLink).

The list of each college's Financial Aid Administrators and Staff is restricted to financial aid staff at the 34 Washington community and technical colleges. Permissions are limited to authorized personnel only. Colleges are required to report any changes in financial aid staff or administration by emailing FinancialAidPolicy@sbctc.edu to maintain accurate records and ensure proper access control.

1.7 Policy Development & Documentation

SBCTC, in tandem with Washington's 34 community and technical colleges in ctcLink, established and maintains system-level financial aid policies and baseline compliance guidance to ensure colleges are equipped to meet Federal Title IV and Washington state requirements. This manual supports colleges in documenting and maintaining financial aid policies and procedures, including required guidelines and to serve as an institutional template.

SBCTC will keep the manual current as system-level policies evolve, while colleges remain responsible for completing, implementing, and maintaining institutional policies and procedures to ensure compliance.

This is accomplished through professional memberships and participation in learning activities, training sessions, webinars, meetings, and professional conferences that include the following sources:
- U.S. Department of Education/Federal Student Aid (ED/FSA)
- National Association of Student Financial Aid Administrators (NASFAA)
- American Association of Collegiate Registrars and Admissions Officers (AACRAO)
- Washington Student Achievement Council (WSAC)
- Higher Education User Group (HEUG)

Regular publications for review include, but are not limited to, those disseminated from ED in the form of Electronic Announcements and Dear Colleague Letters, as well as Today's News provided by NASFAA.

Responsible Personnel

Other offices that may participate in the development and/or implementation of financial aid policies and procedures on a regular basis may include, but are not limited to, the following areas:
- President's Cabinet
- Bursar
- Finance/Accounting
- Registrar/Enrollment Services
- Admissions
- Advising

Existing distribution lists inclusive of the roles and offices listed above will be used to disseminate information, as appropriate.

1.7.1 SBCTC Primary Responsibilities

The SBCTC Financial Aid Policy Staff operates within the Education Division as the systemwide leader in strategy, policy development, and compliance related to the administration of Title IV and other financial aid programs.

Its mission is to provide Washington's 34 community and technical colleges—as well as the students and families they serve—with guidance, leadership, and coordinated support in all areas of financial aid administration. This work is aimed at increasing equitable access to higher education and promoting student success through:
- Systemwide policy and procedure development
- Oversight of regulatory compliance and audit readiness
- Strategic alignment of financial aid practices with student access and completion goals
- Collaboration with state and federal agencies
- Technical support and system design coordination (e.g., ctcLink)
- Ongoing training and professional development for college financial aid staff

1.7.2 Campus Financial Aid Office Primary Responsibilities

To support the educational success of students at Washington's community and technical colleges, each college's Financial Aid Office administers funds from federal, state, institutional, and private sources to promote access, equity, and student completion.

This work contributes to the economic and social well-being of individuals and communities across the state. In alignment with SBCTC system goals and statewide policy, campus financial aid offices are responsible for:
- Administering financial aid in compliance with federal and state laws, SBCTC policy, and institutional procedures.
- Maximizing financial access by offering available aid to as many eligible students as funding permits.
- Assisting students in covering both direct costs (tuition, fees, books, and supplies) and indirect educational expenses (housing, transportation, and personal needs).

- Providing clear, student-centered guidance to students, families, and campus staff regarding financial aid processes and eligibility.
- Managing key financial aid functions, including verification, loan processing, awarding/packaging aid, and executing the policies and procedures outlined in this manual.
- Continuously evaluating the effectiveness and efficiency of financial aid delivery in collaboration with business offices, enrollment services, and other campus departments.
- Participating in outreach, retention, and graduation initiatives, including events and programs that promote enrollment and student engagement.
- Collaborating with faculty, staff, and administrative partners to support institutional and statewide enrollment and completion goals.

1.7.3 SBCTC Business Operations Division Responsibilities
The SBCTC Business Operations Division (also referred to as Finance) is responsible for developing and implementing fiscal and administrative policy for Washington's community and technical college system.

It provides professional guidance, fiscal analysis, and strategic recommendations to SBCTC leadership, the State Board, and the 34 community and technical colleges on matters related to financial planning, budget management, forecasting, and compliance.

The Business Operations Division oversees and supports the following functions:
- Systemwide accounting, financial reconciliation, and fiscal reporting
- Internal and external audits
- Development and implementation of the biennial operating budget and alignment with the capital budget
- Monitoring of systemwide financial accounts, budgets, and fiscal health in compliance with national accounting standards, state regulations, and SBCTC policy
- Centralized processing of vendor accounts payable (A/P) and financial transactions
- Implementation, maintenance, and training for automated financial systems and controls (including ctcLink)
- System office financial operations and support for campus business offices
- In coordination with campus financial aid and business offices, the SBCTC Finance Division also oversees the management of the G5 federal grants system, including the drawdown of Title IV funds in alignment with disbursement and return activity across the 34 community and technical colleges.
- This integrated financial structure ensures accountability, consistency, and transparency across the system while supporting local operations.

1.7.4 ctcLink PeopleSoft College & SBCTC Triage Responsibilities
Triage responsibilities between the Washington State Board for Community and Technical Colleges (SBCTC) and the ctcLink colleges are handled in accordance with the terms outlined in the Service Level Agreement (SLA). Support needs are assessed

to determine whether they fall within the purview of SBCTC or should be addressed by the local college teams.

When an issue involves college-specific policy interpretation, student-specific eligibility determinations, or requires direct access to institutional records, it is escalated back to the appropriate local college. This approach ensures that each matter is resolved by the appropriate party, maintaining both operational efficiency and adherence to established responsibilities.

1.7.4.1 Tier 1 Support

Support Level Tier 1: College Staff

Support Methodology

Users retrieve support information, security access, and log-in support from web, mobile pages, and learning software, including Quick Reference Guides (QRGs) and Canvas courses. Users consult with college Business Analysts (Pillar SMEs), Security administrators and approvers, and Help Desk Staff.

Responsible Party: College Staff

- Refer to Local and SBCTC Documentation. Access your institution's local training and business process documentation. You can also use the ctcLink Reference Center for PeopleSoft QRGs.
- Knowledgeable Business Analysts or Pillar SMEs that can provide guidance on best practices, college policies, and procedures as they pertain to business processes for your institution.
- Experienced staff provide local training opportunities to staff who are onboarding, transitioning positions, or need to learn new tasks as they apply to their college role.
- Help Desk staff to assist with technical support for staff and students, including web browser issues and to resolve log-in issues.
- Local Security Administrators are equipped to assign and remove security role assignments to staff.

If you are unable to resolve the issue, escalate to Tier 2 Support:

- College-appointed staff should submit tickets in ServiceDesk.
- Please use the ticket checklist below to make sure all pertinent information is provided in the ticket.

1.7.4.2 Tier 2 Support

Support Level - Tier 2: ctcLink PeopleSoft Customer Support

Support Methodology

Experienced and knowledgeable functional analysts at SBCTC assess issues and provide solutions for issues unresolved by tier 1.

Responsible Party and Staff Needs

Responsible Party: ctcLink PeopleSoft Customer Support Staff, Applications Services and ctcLink Security Team

Support Staff Needs

- Advanced functional and technical staff, highly skilled in configuration, conversion, integration and implementation of the system.
- Security staff to support clients with security role access issues.
- Application services to provide development, technical support, management of environments and coordination of testing activities.
- Ability to efficiently respond to the client in a timely manner with response to tickets.

1.7.4.3 ctcLink PeopleSoft Customer Support Ticket Checklist

Checklist of details to include in your ticket.

Complete	Task/Activity
	Describe the problem you are encountering and the steps you have taken to resolve. ● Cleared your cache and restarted your browser ● Switched browsers (i.e. Firefox, Internet Explorer, Chrome, etc.) ● Tried different navigation steps
	Steps taken when you encountered the error. What you were trying to do and the expected result. At which step in the process did you encounter the issue.
	Describe any business process changes that may have led to this issue.
	If you are working with someone else (on campus or at SBCTC) on this issue, provide their names and roles.
	What is your navigation and URL? Copy and paste the link address (URL) at the location in PeopleSoft where you are experiencing the issue.
	Which browser (e.g., Firefox, Internet Explorer, Chrome) and environment (PeopleSoft product and module) being utilized.
	Provide full screenshots of: ● Any error messages ● Any warning messages ● Run control parameters
	Provide EMPLIDs as examples Provide multiple IDs if there are many students or staff
	Provide any pertinent information: ● Business unit, Set ID, aid year, term, program plan stacks, class section, item types, log file, instance number, etc.
	Your deadline (date, time) for completing this process.

1.8 Methods for Updating Information & Documentation

The JP has the primary responsibility for developing policies and procedures for the administration of student financial aid. All modifications and additions to the administration of Title IV programs and scholarships policy are reviewed by Financial

Aid Office staff, approved by the JP or designee, and submitted to JP President and Board of Trustees for final approval.

The JP disseminates new information to ensure that the appropriate offices are aware of statutory and regulatory changes that may affect policies and procedures for the entire JP population.

As policy decisions are changed and new processes become part of daily office functions, this manual will be updated as necessary. It is the responsibility of each Financial Aid Office staff member to report changes in his or her area to ensure the accuracy of this manual. The Financial Aid Office Policies and Procedures Manual will be updated, at a minimum, on a yearly basis.

Often, members from other offices on campus will be affected by changes in policy or procedure within the Financial Aid Office. When this is the case, all affected Financial Aid Office staff will meet to discuss the best recourse of action and implementation of new policies and procedures. When necessary, policy and procedural changes will be routed to other offices for approval.

In the administration of student financial aid at JP, the JP has the primary responsibility for informing all Financial Aid Office staff members about the resources available to keep up to date on new regulations, laws, and the U.S. Department of Education's guidelines that might impact the Financial Aid Office's policies and procedures.

Administrative Capability and Title IV compliance are shared responsibilities at JP. Collaboration throughout the institution is important to ensure that JPadheres to Title IV regulations.

Resources used to update this manual include, but are not limited to, the following:

- FSA Partner Connect;
- Federal Registers – both Notices of Proposed Rulemaking (NPRMs) and Final Rules;
- U.S. Department of Education's Audit Guide*, Audits of Federal Student Financial Assistance Programs at Participating Institutions and Institution Servicers*;
- Federal Student Aid Handbooks;
- Code of Federal Regulations;
- Dear Colleague Letters;
- Electronic Announcements;
- Regulations and other publications applying to the years for which financial aid records must be retained;
- The Common Manual published by the National Council for Higher Education Loan Programs (NCHELP);
- National Association of Student Financial Aid Administrators (NASFAA);
- The Chronicle of Higher Education; and
- Newsletters from professional associations (state, regional, and national).

The documents used to update policies and procedures for State financial aid include, but are not limited to, the Washington Student Achievement Council (WSAC), Washington College Grant, and College Bound (WCG/CBS) Program manual, the SBCTC Worker Retraining Grant manual, and the Washington Opportunity Grant Program guidelines. These documents and additional resources can be found at the Washington Student Achievement Council Resource page.

Procedures are also provided by outside agencies in dealing with their funding and/or administration. Examples of these include Washington State Division of Vocational Rehabilitation (DVR), Washington State Dislocated Worker Program (DWP), Washington State Trade Adjustment Assistance (TAA), People for People (PFP), and Federally Recognized Tribes.

The Financial Aid Office staff has access to web version of the NASFAA newsletters (some NASFAA benefits require membership) in an effort to stay up to date on financial aid information. They may also attend the Federal Student Aid Virtual Conference and scheduled webinars; National, Regional, and State Financial Aid Association Conferences and webinars; and various other opportunities to stay current on new and/or updated regulations and processes.

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The Financial Aid Office staff is encouraged to subscribe to the various e-mail listservs available to stay up to date on federal financial aid changes, system outages, and other related news.

- FINAID-L@LISTS.PSU.EDU – information exchange and problem resolution for use by USA college and university financial aid administrators and related personnel.
    - Subscribe via email, send a one-line body-of-text (SUBSCRIBE FINAID-L your_first_name your_last_name) to: LISTSERV@LISTS.PSU.EDU
    - No Subject Line is needed.
- Washington Financial Aid Association (WFAA) list serve, wfaal-bounces@wfaa.org.
- Knowledge Center Subscription – daily or weekly email summary that includes all updates to the Knowledge Center for that time period.

The information contained in this manual detail, as much as possible, the policies and procedures of this office, as well as any references that are applicable to these policies and procedures. The manual covers all financial aid programs administered by this office, as well as the application for, receipt of, and reporting of all such funds.

JP reserves the right to change, without notice, any statement within this manual due to federal, state, or institutional changes in policies, procedures, or regulations. All revisions to this manual will be communicated through official channels, including email notices, staff meetings, and training sessions.

Disclaimer: Every effort is made to provide accurate and current information. 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.

1.9 Strict Adherence

Strict adherence to the policies and procedures outlined in this manual is required to maintain compliance with federal regulations and ensure that Title IV funds are administered accurately and responsibly.

Non-compliance may result in penalties to JP, including the loss of eligibility to participate in federal student aid programs, financial liabilities, and potential audits by the U.S. Department of Education. The procedures in this manual are designed to protect both students and JP.

This manual serves as a critical resource for all personnel involved in Title IV administration. It is essential that all relevant staff become familiar with its contents and comply with the procedures outlined. Continued compliance with federal regulations ensures that JP can provide much-needed financial assistance to students and maintain its eligibility to participate in Title IV programs.

Section 2: Administrative Organization & Office Management

2.1 Overview

Administrative organization and office management are essential for the smooth functioning of the Financial Aid Office. Administrative organization must be well implemented to manage and direct JP through various departments and resources to achieve its goals. Effective and efficient office management reduces costs, enhances productivity, improves employee morale, and strengthens workplace culture.

Office management integrates administrative responsibilities with strategic collaboration among key stakeholders to ensure effective and compliant operations. It also establishes an operational framework for coordinating office activities, maintaining employee engagement, and providing the support necessary for staff to perform effectively in their roles.

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2.2 Organizational Charts

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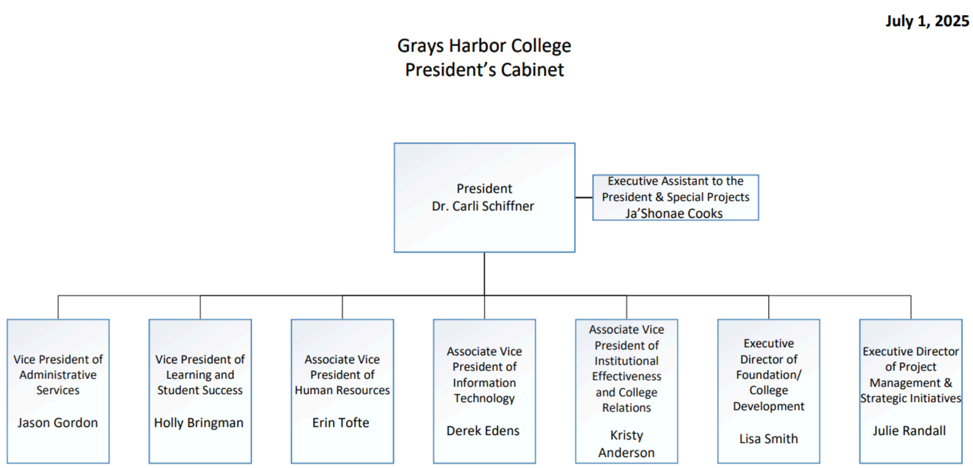

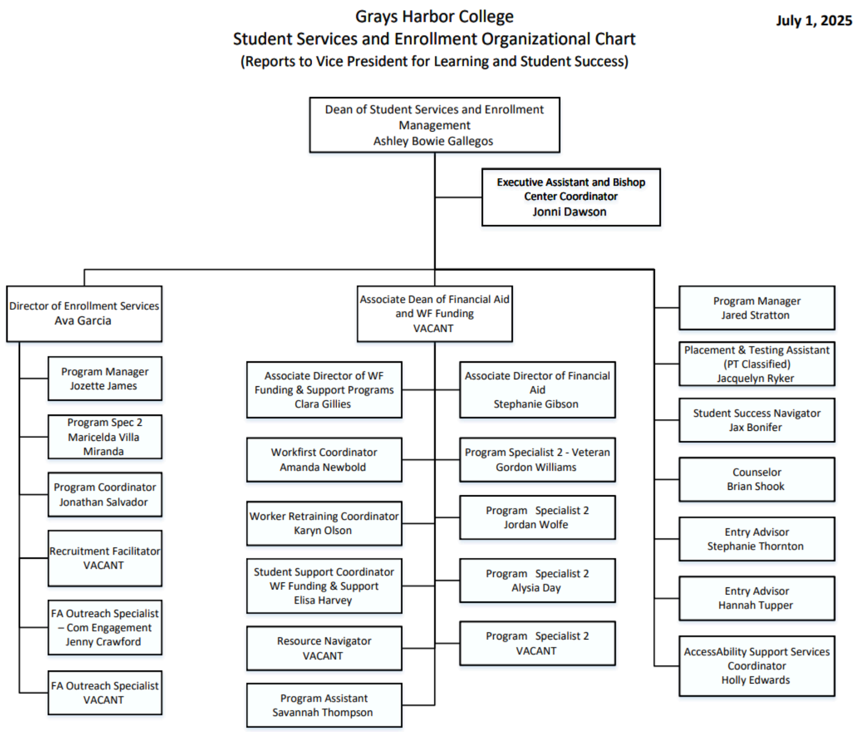

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2.3 Financial Aid Office Staff

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Name	Email	Phone	Program(s)	Location	Title

2.4 Administrative Capability

34 CFR 668.16

Policy

JP demonstrates its ability to administer Title IV programs in accordance with the standards set by the U.S. Department of Education. JP administers Title IV, HEA programs in accordance with all statutory provisions of or applicable to Title IV of the HEA, all applicable regulatory provisions prescribed under that statutory authority, and all applicable special arrangements, agreements, and limitations entered into under the authority of statutes applicable to Title IV of the HEA.

Procedure

To meet the standards of Administrative Capability at JP,

- Designates a capable individual to be responsible for administering all the Title IV, HEA programs in which it participates and for coordinating those programs with the institution's other Federal and non-Federal programs of student financial assistance.
- Uses an adequate number of qualified persons to administer the Title IV, HEA programs in which the institution participates.
- Communicates to the individual designated to be responsible for administering Title IV, HEA programs, all the information received by any institutional office that bears on a student's eligibility for Title IV, HEA program assistance; and
- Has written procedures for or written information indicating the responsibilities of the various offices with respect to the approval, disbursement, and delivery of Title IV, HEA program assistance and the preparation and submission of reports to the U.S. Department of Education.
- Administers Title IV, HEA programs with adequate checks and balances in its system of internal controls; and
- Divides the functions of authorizing payments and disbursing or delivering funds so that no office has responsibility for both functions with respect to any particular student aided under the programs.
- Establishes and maintains records required under this part and the individual Title IV, HEA program regulations; and Reports annually to the Secretary on any reasonable reimbursements paid or provided by a private education lender or group of lenders as described under section 140(d) of the Truth in Lending Act (15 U.S.C. 1631(d)) to any employee who is employed in the financial aid office of the institution or who otherwise has responsibilities with respect to education loans, including responsibilities involving the selection of lenders, or other financial aid of the institution.
- Establishes, publishes, and applies reasonable standards for measuring whether an otherwise Title IV financial aid eligible student is maintaining satisfactory academic progress in his or her educational program.
- Develops and applies an adequate system to identify and resolve discrepancies in the information that the institution receives from different sources with respect to a student's application for financial aid under Title IV, HEA programs.
- Refers any credible information indicating that an applicant for Title IV, HEA program assistance may have engaged in fraud or other criminal misconduct in connection with his or her application to the Office of Inspector General of the Department of Education for investigation.
- Provides adequate financial aid counseling with clear and accurate information to students who apply for title IV, HEA program assistance.
- Provides all program and fiscal reports and financial statements required for compliance in a timely manner.
- Shows no evidence of significant problems that affect the institution's ability to administer a Title IV, HEA program and is not, and has not been,
  - o Debarred or suspended under Executive Order (E.O.) 12549 (3 CFR, 1986 Comp., p. 189) or the Federal Acquisition Regulations (FAR), 48 CFR part 9, subpart 9.4; or

    - Engaging in any activity that is a cause under 2 CFR 180.700 or 180.800, as adopted at 2 CFR 3485.12, for debarment or suspension under E.O. 12549 (3 CFR, 1986 Comp., p. 189) or the FAR, 48 CFR part 9, subpart 9.4.
  - Does not have any principal or affiliate of the institution, or any individual who exercises or previously exercised substantial control over the institution who,
    - Has been convicted of, or has pled nolo contendere or guilty to, a crime involving the acquisition, use, or expenditure of Federal, State, Tribal, or local government funds, or has been administratively or judicially determined to have committed fraud or any other material violation of law involving those funds; or
    - Is a current or former principal or affiliate or any individual who exercises or exercised substantial control as defined in § 668.174(c)(3), of another institution whose misconduct or closure contributed to liabilities to the Federal Government in excess of 5 percent of its Title IV, HEA program funds in the award year in which the liabilities arose or were imposed.
- Does not have more than 33 percent of its undergraduate regular students withdraw from the institution during the institution's latest completed award year.
- Has a cohort default rate
  - That is less than 25 percent for each of the three most recent fiscal years during which rates have been issued,
  - On or after 2014, that is less than 30 percent for at least two of the three most recent fiscal years during which the Secretary has issued rates, and
  - As defined in 34 CFR 674.5, on loans made under the Federal Perkins Loan Program to students for attendance at an institution that does not exceed 15 percent.
- Has not been subject to a significant negative action or a finding as by a State or Federal agency, a court, or an accrediting agency, where the basis of the action is repeated or unresolved, such as non-compliance with a prior enforcement order or supervisory directive, and the institution has not lost eligibility to participate in another Federal educational assistance program due to an administrative action against the institution.
- Participates in the electronic processes that the U.S. Department of Education provides at no substantial charge to the institution and identifies through a notice published in the Federal Register.
- Develops and follows adequate procedures to evaluate the validity of a student's high school diploma.
- Provides adequate career services to eligible students who receive Title IV, HEA program assistance.
- Provides students, within 45 days of successful completion of other required coursework, geographically accessible clinical or externship opportunities related to and required for completion of the credential or licensure in a recognized occupation.
- Disburses funds to students in a timely manner that best meets the students' needs.
- Offers gainful employment (GE) programs subject to 34 CFR 668 subpart S, and at least half of its total Title IV, HEA funds in the most recent award year are not from programs that are "failing" under 34 CFR 668 subpart S.

- Does not engage in substantial misrepresentations, as defined in 34 CFR 668 subpart F, or aggressive and deceptive recruitment tactics or conduct, including as defined in 34 CFR 668 subpart R.
- Does not otherwise appear to lack the ability to administer the Title IV, HEA programs competently.

2.5 Responsibilities & Relationships with Other Campus Offices

Policy

JP

The Financial Aid Office works in collaboration with other JP offices that participate in the implementation and management of federal, state, and institutional financial aid programs.

Procedure JP

JP JPis responsible for ensuring that JP complies with all applicable regulations, including student financial assistance regulations, and for approving all policies and procedures. The president is also responsible for establishing an organizational structure with clear, separate functions and for hiring skilled staff to administer all phases of institutional operations that meet the standards set by all accreditation agencies and other organizations with which partnerships are formed.

JP JP is responsible for ensuring that the entire College complies with all regulations governing fiduciary matters, fiscal integrity, and audits. This role also ensures that the JP manages student billing, posts student financial assistance to student accounts, and refunds credit balances to the appropriate parties in a timely manner.

JP JP is responsible for ensuring that the entire College develops academic programs that meet the definitions of eligible programs for administering governmental student financial assistance programs. This role also ensures that the appropriate accreditations are maintained and that the faculty and academic support departments adhere to institutional academic policies for admitting, suspending, grading, and graduating eligible students.

JP is responsible for multiple areas, including student financial assistance. In this role, he/she is in charge of providing adequate resources to the office to ensure adequate staffing and training and approves the development of institutional policies and procedures related to the administration of student financial assistance.

JP JP is the primary person responsible for overseeing all activities related to student financial aid administration across the entire college.

JP JP is the primary person responsible for ensuring that the JP manages the student billing, posting of student financial assistance to student accounts, and refunding student financial assistance credit balances back to the appropriate parties in a timely fashion for the entire student population. This position is overseen by JP JP.

JP JP is the primary office responsible for student registration and records, scheduling, classrooms, student privacy and FERPA, degree certification and diplomas, faculty course evaluations, summer school programs, and the official academic calendar.

2.6 Missions, Values, and Goals

JP(or both)>>

Mission Statement
To cultivate an inclusive, equitable, and vibrant community, Clark College educates, empowers, and elevates individuals to achieve their personal and professional goals.

Vision
Rooted in social justice, Clark College is a beacon of hope, opportunity, and transformation, providing excellent, equitable education that fosters economic, cultural, and community growth.

Goals
Outreach and Access
Identify, assess, and meet community needs to promote open access to the college.

Delivery Alternatives
Assess students' needs and outcomes, as well as create innovative and flexible learning opportunities.

Educational Programs
Provide learning opportunities and academic support to ensure the highest levels of academic performance.

Student Affairs
Provide a research-based, learner-centered program of services that supports access and student engagement from matriculation to goal attainment.

Workforce Development
Provide student-centered workforce programs in collaboration with local employers and economic development agencies.

Human Resources
Recruit, develop, assess, and retain quality full- and part-time faculty and staff.

Technology
Provide information and communications technology infrastructure and services to support the college's mission.

Resources
Develop, obtain, and allocate the necessary resources to implement the college's mission.

Sustainability Education and Operations
Create, develop, and enhance programs to reduce waste, conserve energy and green space, protect water resources, and promote the wellness of students, faculty, and staff.

2.7 Financial Aid Office Location

(Insert Table for Multiple Locations)

Campus

Building

Room #

2.8 Office Hours/Appointments

Business Hours
JP
8 a.m. to 4:30 p.m. Monday-Wednesday in-person
8:30 am to 4:30 p.m. Tuesday and Thursdays virtually>>

Phone
JP

Link to schedule a phone appointment with a financial aid representative JP.

Email
JP

Chatbot
JP

Financial Aid TV
Get answers to your financial aid questions with short, informative videos at Financial Aid TV. JP

2.9 Personnel Policies

This section contains policies related to human resource administration in the state's community and technical college system. State Board authority is limited in this area, with the majority of policies, rules, and regulations governing faculty and staff resting with other agencies of state government. Links are provided in the respective policy statements to RCWs, WACs, and procedures and guidelines that are relevant to that particular policy, SBCTC Resolution 02-09-16.

Equal Employment Opportunity and Affirmative Action

The State Board for Community and Technical Colleges (SBCTC):

A. Is committed to providing equal employment opportunity to applicants and employees without regard to race, creed, religion, color, national origin, sex, sexual orientation, age, marital status, veteran status, limited English-speaking ability, or disability (see RCW 41.06.150; RCW 49.74).
B. Recognizes its continuing responsibility to set an example of affirmative action by including women, people of color, people with disabilities, Vietnam era veterans, and disabled veterans at all levels within the agency workforce.
C. Considers equal opportunity, affirmative action, and non-discrimination to be fundamental to the mission, goals, and objectives of the agency and hereby commits the necessary staff time and resources to implement this affirmative action policy effectively.

The executive director has overall responsibility and authority to ensure that the affirmative action program is implemented. The division directors share this responsibility, as explicitly noted in the plan. Responsibility for coordination of the plan and maintenance of systems to monitor program effectiveness is vested in the Human Resource Director and in the Director, Administrative Services Division, who is the designated agency's affirmative action officer.

The executive director will ensure that the agency's commitment to affirmative action is demonstrated through:

A. Reviewing minimum qualifications on agency job announcements to ensure that they are job-related and that they do not contain artificial barriers, which may disproportionately screen out members of protected groups.
B. Developing an intensive and aggressive recruiting program designed to assure that competitive people of color, women, people with disabilities, Vietnam era, and disabled veterans are contacted and are encouraged to apply for vacant positions within the agency.
C. Monitoring of each phase of the agency's recruiting and selection processes to determine affirmative action impact.
D. Continual monitoring of the agency's training, promotion, and compensation practices to ensure that these programs are administered in a non-discriminatory manner.

A plan has been designed to implement these principles that provide positive benefits to the agency through fuller utilization and development of women, people of color, people with disabilities, Vietnam era veterans, and disabled veterans. This plan will be reviewed, and its effectiveness reevaluated periodically.

Other SBCTC Personnel Policies can be found at Policy Manual–Chapter 2: Faculty and Staff Personnel.

Drug-Free Workplace

In compliance with Federal law, 20 USC 1011i and 34 CFR 86.100(a), JP has adopted and implemented a drug and alcohol abuse prevention program. The components of the program, with information about where more material regarding drug and alcohol related issues can be located at JP.

Reasonable Accommodation

Reasonable accommodation is provided in all aspects of employment consistent with the Americans with Disabilities Act and state law. Employees may request reasonable accommodation by contacting JP at JP or visit the JP located in JP.

Additional information can be found on the JP website at JP.

JP

2.10 Correspondence

Policy

JP

The Financial Aid Office (FAO) makes a concerted effort to limit the number of application forms required from students to receive consideration for all student financial assistance programs.

All forms of written communications from the institution are reviewed and updated annually, and when possible, are reduced or eliminated. The communications are also standardized as much as possible and designed with clear and concise messages on the subject matter, directions to follow, and contact information.

Incoming correspondence initiated by the student is responded to in a timely fashion

Procedure

JP

The Financial Aid Office utilizes multiple communication channels to correspond with all internal and external customers. JP website is updated regularly with information relating to important topics regarding financial aid application instructions, application forms, policy statements, and other pertinent information.

General mailings of letters, brochures, and application materials to prospective and continuing students are initiated by JP as needed to keep students updated.

Email exchanges between the student and the Financial Aid Office, and between the Financial Aid Office and other JP offices, are frequently used to improve response time.

JP.

2.11 Confidentiality

Policy

JP maintains confidentiality of student records in accordance with the Family Educational Rights and Privacy Act (FERPA) JP. Student information is considered private and may only be released when a signed authorization is presented to the JP.

All financial aid application data is treated as confidential and handled in accordance with FERPA and institutional data privacy policies. Access to student records is limited to authorized personnel.

The Financial Aid Office is responsible for safeguarding all Federal Tax Information (FTI) obtained through the FAFSA process, IRS Data Retrieval Tool (DRT), tax transcripts, or other federally authorized sources. FTI is confidential and must be protected in accordance with IRC §6103, IRS Publication 1075, and U.S. Department of Education security requirements.

Access to FTI is restricted to staff whose job duties require its use. FTI must be stored securely, transmitted only through encrypted or institution-approved secure methods, and retained or destroyed according to federal and institutional record-retention guidelines. Unauthorized access, disclosure, or misuse of FTI is strictly prohibited and may result in disciplinary or federal actions.

All staff with FTI access must complete required annual training and immediately report any suspected incident involving FTI to JP <<Insert Staff Title, for example Director of IT>> and JP.

Procedure

FERPA directory information is information contained within a student's education record that, if disclosed, would not generally be considered harmful or an invasion of privacy. Directory information may be released without the student's explicit consent unless the student requests the ability to block their directory information from disclosure.

The State Board for Community and Technical Colleges governs directory information provided by each college as expressly authorized by each system college chancellor and president, FERPA Directory Information.

Only authorized staff may access Federal Tax Information (FTI).

- Staff must use FTI solely for financial aid processing and view only the information necessary for the task.
- Electronic FTI must be stored in secure, encrypted institutional systems.
- Physical documents containing FTI must be kept in locked, restricted-access locations.
- FTI may only be transmitted using institution-approved secure methods (e.g., encrypted email or secure file transfer).
- FTI must never be sent to personal email accounts or unapproved platforms.
- Printed FTI must be retrieved immediately and not left unattended.
- Retain FTI only for the period required by record-retention schedules.

- Dispose of FTI using secure shredding or IT-approved secure electronic deletion.

Report any loss, unauthorized access, or accidental disclosure of FTI immediately to JP <<Insert Staff Title, for example Director of IT>> and JP.

<<Insert College Procedures>>

2.12 Records Management and Retention

Policy
Community and Technical Colleges are required to maintain records in keeping with the Washington Secretary of State's Office retention schedules. In cases in which the Community and Technical College Records Retention Schedule is silent, colleges should follow the State Government General Records Retention Schedule.

All financial aid application forms and related documents are retained for a minimum of JP years in compliance with federal and state regulations.

Procedure
The Financial Aid Office is responsible for ensuring that records are maintained in a secure, accessible, and auditable manner for the required retention period and that disposal is conducted using approved, secure methods. These practices help safeguard confidential information, preserve institutional compliance, and support transparent, well-documented financial aid operations. Standards for retention and disposal can be found at

- Community and Technical Colleges Records Retention Schedule
- State Government General Records Retention Schedule

2.13 Safeguarding Electronic Records

Policy
All written and electronically processed records prepared by the State Board and the State's Community and Technical College Districts shall be available for public inspection, with limited exceptions, such as student information/records, personnel records, surveys of personal opinions, etc.

Procedure
WAC 131-276-120
Requests for public records shall be made in the board offices,

- WEA Building, 319 East 7th Avenue, Olympia, Washington.

Public records and a facility for their inspection will be provided by the public records officer. Such records shall not be removed from the place designated for their inspection.

Copies shall be made at the board offices. If copying facilities are not available at the board office, the board will arrange to have copies made commercially according to the provisions of WAC 131-276-090.

Section 3: Student Consumer Information Requirements

3.1 Overview

Federal regulations require institutions to provide student consumer information under a number of categories listed below. The regulations distinguish information that must be given to enrolled students versus prospective students, to current employees versus prospective employees, to prospective student-athletes, and to parents, coaches, guidance counselors, and the general public.

Some of this information must be sent or given to the consumer automatically, and some must be provided only upon request. This may involve offices other than financial aid. The office that produces and maintains the information may not necessarily be the office responsible for disseminating it.

JP Financial Aid Office is in compliance with all federal regulations regarding the required collection and dissemination of consumer information materials. General and specific information about JP is provided below. JP provides this information through publications, mailings, and electronic media channels.

3.2 Notice to Enrolled Students

Policy

JP is required to disclose certain information to enrolled and prospective students, parents, employees, and the public. JP employees are available, with reasonable notice, to assist students in obtaining consumer information on a full-time basis throughout normal working hours.

In accordance with the federal Higher Education Opportunity Act of 2008, as amended, and federal laws and regulations, JP distributes this annual notice to enrolled students, and others as applicable, announcing the availability of certain information considered by law to be "Consumer Information."

Procedure

Consumer Information is located on JP Consumer Information website. This information primarily concerns the institution, its financial aid options, and other institutional policies and programs, and includes a brief description and the electronic address or other locations where the information can be found.

This notice may also list other important disclosures, with links to where to obtain the information.

Requests may be made for paper copies of all information and disclosures by contacting the responsible JP office.

JP; Grades & Withdrawing – the Registrar's Office.>>

3.3 Financial Aid Information

Policy

JP must publish and make readily available financial aid information to enrolled and prospective students, upon request. The financial aid policies at JP are intended to promote access to higher education for all qualified students who choose to enroll. All prospective and enrolled students are encouraged to complete the FAFSA® to ensure consideration for all financial aid opportunities available.

The following information is made available to prospective and enrolled students by the Financial Aid Office through JP website and upon request:

- All the need-based and non-need-based federal, state, local, private, and institutional student financial assistance programs available to students who enroll at the institution.
- Terms and conditions of Title IV, HEA loans.
- Criteria for selecting recipients and for determining the offer amount.
- Eligibility requirements and procedures for applying for aid.
- Methods and frequency of disbursements of aid.
- Rights and responsibilities of students receiving Title IV, HEA Student Financial Aid, including criteria for continued student eligibility and standards for Satisfactory Academic Progress (SAP).
- Terms of any loan received as part of a financial aid package, sample loan repayment schedule, and the necessity for repaying loans.
- Procedures and forms by which students apply for assistance.
- Entrance counseling for first-time federal student loan borrowers.
- A statement that enrollment in a program of study abroad approved for credit by the home institution may be considered enrollment in the home institution for purposes of applying for federal student financial aid.
- General conditions and terms applicable to employment provided as part of the financial aid package.
- The exit counseling information that JP provides and collects.

HEA Sec 485(a)(1)(A) (pg.613)
34 CFR 668.41(d)(1), 34 CFR 668.42
FSA Handbook Volume 2, Chapter 6

Procedure

The Financial Aid Office oversees the design, development, publication, and dissemination of all consumer information in cooperation with other JP offices.

JP JP is responsible for maintaining the accuracy and timeliness of the information.

The dissemination of the information is by internet, intranet <<aka Student Portal for enrolled students, Insert Student Portal Name >>, letters, brochures, and emails.

Counselors are available during normal business hours to assist students in obtaining information.

The Financial Aid Office complies with this requirement by listing all pertinent information on JP Consumer Information websites at, JP.

3.4 Institutional Information

Policy

JP makes Institutional Information readily available upon request to enrolled and prospective students.

In keeping with our values and goals, JP leads with racial equity to maximize student potential and transform lives within a culture of belonging that advances racial, social, and economic justice in service to our diverse communities.

Procedure

JP provides the following information to prospective and current students:

- History of the institution and academic structure;
- Current degree programs and other educational and training programs (34 CFR 668.41(a)-(d), 34 CFR 668.43);
- Academic requirements to complete the program, including course scheduling, grading scale, minimum GPAs, and attendance policies;
- Names of associations, agencies, or governmental bodies that accredit, approve, or license the institution and its programs (34 CFR 668.41(a)-(d), 34 CFR 668.43);
- A list of faculty and other personnel;
- The cost of attending the institution (34 CFR 668.41(a)-(d), 34 CFR 668.43);
- Requirements and procedures for official and unofficial withdrawal, as well as administrative withdrawals, and for Return of Title IV, HEA grant and loan aid (34 CFR 668.41(a)-(d), 34 CFR 668.43 and 34 CFR 668.22);
- Family Educational Rights and Privacy Act (FERPA) (34 CFR 668.41(c), 34 CFR Part 99); and
- Services and facilities available to students with disabilities, including students with intellectual disabilities,
    - The titles of persons designated under 34 CFR 668.44 and information regarding how and when those persons may be contacted.

This information is available on JP website, and various offices and departments share joint responsibilities for the collection, accuracy, and dissemination of this information.

JPons Office; withdraw and FERPA – Registrar's Office>>

3.5 Contact Information

Policy

JP makes information available regarding how and where to contact individuals designated to assist enrolled and prospective students in obtaining institutional or financial aid information required to be disclosed under HEA Section 485(a)(1), Section 485(f), Section 485(h), and Section 485(j).

HEA Sec. 485(a)(1)(H) (page 613)
34 CFR 668.43(a)(8), 34 CFR 668.44
FSA Handbook Volume 2, Chapter 6

Procedure
JP **Contact Information**
JP

College	Campus	Business Hours	Location	Phone Number	Email
Bates Technical College	Downtown	Monday – Thursday 8 am – 4:30 pm, Friday 10 am – 4 pm	Room A208	253-680-7020	FinancialAid@BatesTech.edu
	South Campus	Tuesday – Thursday 7:30 am – 4 pm	Room A100E		
	Central Campus	Closed			

3.6 State Grant Assistance
Policy
JP informs all eligible students enrolled in the institution about the availability of and their eligibility for grant assistance from the state of Washington.

In addition, JP provides information about grant assistance from other states to students from other states, as applicable.

HEA Sec. 487(a)(9)

Procedure
JP advises eligible students enrolled at the institution of their,
- Eligibility requirements and procedures for applying for aid, and
- Methods and frequency of disbursements of aid.

Washington State Programs
Need-Based Programs
Washington College Grant (WCG)
The Washington College Grant (WA Grant) is one of the most generous and flexible financial aid programs in the country. People of all ages from low- and middle-income families may qualify to get money for college, career training, and participating in apprenticeships. Funding is guaranteed to eligible students.

College Bound Scholarship (CBS)
College Bound provides an early commitment of state financial aid to eligible students from low-income families.

Washington State Work-Study Program (SWS)
State Work Study is financial aid for low- and middle-income students. Qualifying students get an approved job, on- or off-campus, to support their education.

Passport to Careers
The Passport to Careers program helps students from foster care and unaccompanied homeless youth attend and succeed in college, apprenticeships, and pre-apprenticeship programs.

Washington State Opportunity Scholarship
The Washington State Opportunity Scholarship (WSOS) helps low- and middle-income Washington students earn degrees, certificates, or apprenticeships in high-demand trade, health care, or STEM fields and launch careers in Washington State.

Opportunity Grant (OG)
The Opportunity Grant program helps low-income students complete up to one year of college and a certificate in a high-wage, high-demand career.

Merit-Based Programs
American Indian Endowed Scholarship
The American Indian Endowed Scholarship benefits eligible students who have close social and cultural ties to an American Indian tribe or community in Washington State.

Washington Award for Vocational Excellence (WAVE)
The Washington Award for Vocational Excellence (WAVE) recognizes graduating high school seniors and community & technical college students for outstanding performance in career and technical education (CTE) programs.

Workforce Programs
Teacher Programs
The Washington State Educator Workforce programs provide financial aid to attract and retain teachers. Participants work in subjects or locations of high need, known as shortage areas.
Washington Health Corps

Washington Health Corps programs support licensed health professionals in providing primary care at approved sites in critical shortage areas.

National Guard Grant
The National Guard Postsecondary Education Grant helps members of the Washington National Guard get an undergraduate degree or certificate.

Aerospace Loan Program
The Aerospace Loan Program supports training for entry-level aerospace workers.

Other State Programs
Basic Food Employment Training Program (BFET)
Offered through the Department of Agriculture's Food and Nutrition Service (FNS), the Basic Food Employment and Training (BFET) program is another means by which the State Board for Community and Technical Colleges (SBCTC) facilitates access to federal workforce education and training dollars to enable basic food recipients to gain the skills necessary for employment. The target population is basic food recipients, not currently on Temporary Assistance for Needy Families (TANF).

WorkFirst Program (WF)
WorkFirst can help students pay for tuition and books, and, as a WorkFirst participant, students may also qualify for childcare and other WorkFirst benefits through the Department of Social and Health Services (DSHS).

Worker Retraining Program (WRT)
The Worker Retraining program can help pay for training expenses at Washington state's community and technical colleges and selected licensed private schools for those who have lost their jobs due to economic changes and for those receiving Unemployment Insurance (UI) benefits.

Early Achievers Grant (EAG)
The Early Achievers Grant supports early learning professionals pursuing an Early Childhood (ECE) Stackable Certificate or an ECE Associate Degree.

Tuition Waiver (TW)
Tuition Waivers fall into three main categories: those required by law, those required by the State Board, and those that colleges are allowed, but not required, to offer (optional waivers). In addition, some waivers are subject to a limitation on the total amount that can be waived by the community and technical college system.

3.7 Facilities and Services Available to Students with Disabilities

Policy
The JP is responsible for receiving, approving, and coordinating services and accommodations for qualified students with disabilities to ensure they are provided access to JP educational programs.

Contact the JP staff by phone or email to discuss your educational goals.

HEA Sec. 132(i)(1)(V)(ii), 485(a)(1)(I)
34 CFR 668.43(a)(7)
FSA Handbook Volume 2, Chapter 6

Procedure
Reasonable accommodation is provided in all aspects of employment consistent with the Americans with Disabilities Act (ADA) and state law. The JP provides services to JP students with disabilities. The goal of the << Insert Office Name, for example, Disabilities Resource Center>> is to ensure that students with disabilities are afforded an equal opportunity to fully participate in all aspects of life at JP. The JP serves students with a wide array of disabilities and seeks to provide valuable information for students, parents, faculty, and staff related to various responsibilities, services, and programs.

3.8 Cost of Attendance

Policy
JP cost of attendance (COA) represents the students' basic living expenses in addition to tuition, books, and supplies.

Students are not allowed to receive aid that exceeds their cost of attendance.

HEA Sec. 485(a)(1)(E)
34 CFR 668.41(d)(2), 34 CFR 668.43
FSA Handbook Volume 2, Chapter 6

Procedure
JP offers a high-quality education at an affordable price. The cost figures represent average, estimated, full-time costs for the academic year (fall, winter, spring quarters) and can be found on JP website at, JP.

The costs included in the Cost of Attendance are as follows,

- **Tuition and Fees:** The cost of tuition and fees for a typical student based on full-time enrollment. The actual costs that a student is charged will vary based on the student's program of study and residency.
- **Books, Course Materials, Supplies, and Equipment: An** allowance for books, course materials, and equipment, which must include all such costs required of all students in the same course of study.
- **Living Expenses (Housing & Food):** A reasonable estimate of what it costs to live while attending the institution. Actual costs may vary by individual student choices. Typically, it includes rent, food, household supplies, and utilities.
- **Miscellaneous Personal Expenses:** Estimate of costs for clothing, haircuts, entertainment, and other miscellaneous expenses. What is spent on these types of items may be higher or lower depending on the student's lifestyle.
- **Transportation:** Represents travel costs for the average number of trips the typical student might take. What the student spends on travel may be higher or lower depending on the number of trips, distance, and mode of travel.

3.9 Refund Policy

Policy

Students who are due refunds are not required to submit refund requests, as refunds are automatically processed. Outstanding obligations to the institution will be deducted from any refund.

HEA Sec. 485(a)(1)(F)
34 CFR 668.41(d)(2), 34 CFR 668.43 (a)(2)3(4)
FSA Handbook Volume 2, Chapter 6

Procedure
Student Account Refunds
Once the Financial Aid Office verifies the student's eligibility, JP JPwill process the student's refund, which will be disbursed through BankMobile. All tuition, fees, book charges, and outstanding obligations will be paid before a refund is issued.

JP has a published policy outlining when and how much students may be refunded for dropped classes each term. These refund policies are guided by applicable state regulations.

- **Refunds for students receiving federal Title IV financial aid** will be made in accordance with the Federal Return of Title IV Funds Policy. Any aid that is not earned must be returned to its source.
- **Payments made by cash, money order, check, or debit/credit card** will be refunded to the student using the original method of payment whenever possible. If tuition and fees were paid with a personal check, the refund will be processed once the student's check has cleared the bank.

For more information, please refer to the ctcLink Accounting Manual, section 50.70.120 – Student Refunds.

- **Payments made by external funding sources** (third-party, sponsor, donor, scholarship, etc.) are reimbursed directly to that agency.
- **Payments made for Community Education** courses will be reimbursed according to the college's refunding policy.

Students who believe extenuating circumstances justify an exemption to the policy may complete a Petition. Petitions may be granted in the event of an exceptional unforeseen circumstance (documented medical reasons, death in the immediate family, or involuntary call to active duty military). Deadlines apply; students should contact the JPat JP for more information.

3.10 Requirements for Withdrawals and Return of Title IV Financial Aid

Policy
JP refund policy states that tuition and fees will be refunded in full for coursework dropped on or before the *Last Day to Drop Classes*, or for coursework canceled by JP.

If a student withdraws from all courses or stops attending before completing more than 60% of the payment period or term, federal regulations require the school to determine how much Title IV financial aid was earned. This process is called the Return of Title IV (R2T4).

In all cases, the federal repayment policy supersedes JP refund policy for students receiving federal financial aid and completely withdrawing from JP.

These policies are outlined in JP Catalog, the Financial Aid Handbook and Section 13: Return to Title IV (R2T4)Section 13: Return to Title IV (R2T4) of this manual.

HEA Sec. 485(a)(1)(F)
34 CFR 668.41(d)(2), 34 CFR 668.43(a)(2)3(4)
FSA Handbook Volume 2, Chapter 6

Procedure
The student and the institution are both responsible for returning unearned federal financial aid to the federal government. The student will be billed by JP for any amount due as a result of the Return of Title IV (R2T4) calculation.

The amount of federal aid earned is based on the number of days the student attended compared to the total days in the term. Any unearned federal aid must be returned to the appropriate federal programs, which may result in a balance owed to the institution. Students who complete more than 60% of the term are considered to have earned 100% of their federal aid.

The institution will notify students in writing of the results of the R2T4 calculation, including any required repayments and applicable deadlines. Additional information about institutional refund policies and the impact of withdrawal on future financial aid eligibility is available upon request from the Financial Aid Office.

3.11 Academic Program, Instructional Facilities, and Faculty

Policy
JP makes available to prospective and enrolled students' information about the academic programs, Instructional Facilities, and Faculty available at the institution.

HEA Sec. 485(a)(1)(G)
34 CFR 668.43(a)(5) and (c)
FSA Handbook Volume 2, Chapter 6

Procedure
Academic program information can be found on JP website at JP.

Information regarding JP campuses and centers, including directions, can be found at JP.

JP staff and faculty directory information can be found at << Insert Directory Information Website, if you don't have a staff and faculty directory you can insert a Department Directory>>.

3.12 Transfer of Credit

Policy

Students transferring among system colleges should not be penalized by the differences in the specific requirements imposed by individual campuses within the general guidelines for fulfilling course distribution requirements of transfer degrees. SBCTC Policy Manual, 4.30 Transfer Policies

Procedure

Transfer within the community and technical college system

System colleges have developed and adopted guidelines for reciprocity of transfer coursework among colleges to include reciprocity of individual courses, distribution area or specific requirement courses, and diversity course requirements (see Inter-College Reciprocity).

Transfer to four-year institutions

The State Board encourages community and technical colleges to:

A. Maintain membership in the Intercollege Relations Commission (ICRC) of the Washington Council for High School-College Relations (see ICRC).
B. Annually inform baccalaureate institutions regarding changes in the curriculum related to generally transferable courses in order to assure accurate course equivalency lists (see Course Equivalency Guides/Course Transfer Information).
C. Adopt new Major Related Program degree pathway agreements when negotiated as a means of providing students with preparation for selected majors regardless of their choice of future institution, and to develop and implement program-to-program articulation agreements with nearby public and private four-year institutions in the state of Washington to smooth pathways most commonly followed by transfer students.
D. Follow the College in the High School (CiHS) academic/transfer guidelines when offering courses at high schools for college credit and eventual transfer.

Transfer of general education courses

A student who completes courses selected from within the general education categories listed at a public community, technical, four-year college or university in Washington State will be able to transfer and apply a maximum of 45 quarter credits/units toward general education requirement(s) at any other public and most private higher education institutions in the state.

For transfer purposes, a student must have a minimum grade of C or better (2.0 or above) in each course completed. Students who transfer these courses must still meet a receiving institution's admission requirements and eventually satisfy all their general education requirements and their degree requirements (see One Year Transfer Courses).

Transfer from four-year institutions (Reverse Transfer)
Reverse articulation allows eligible students to receive their associate degree after transferring to a baccalaureate institution. Students who transfer prior to completing their associate degree can complete any remaining requirements as part of their baccalaureate degree program and apply those credits/units back to the community or technical college to receive their associate degree (see Reverse Transfer).

The four-year institutions of higher education are encouraged to work with the SBCTC to develop plans for facilitating the reverse transfer of academic credits/units from four-year institutions to community or technical colleges. The plans should include the following provisions:

A. a policy allowing eligible students the opportunity to transfer credits/units from a four-year institution back to a community or technical college, to use towards a two-year degree; and
B. procedures for notifying eligible students of their eligibility in the program

Transfer degree titles
Transfer degree titles, specifically those designated as state-approved degrees such as the Direct Transfer Agreement (DTA), Associate in Science-Transfer (AS-T), or any with the Major Related Pathway (MRP) designation, carry the official State Board title. These degree titles represent specific negotiated agreements between the State Board for Community and Technical Colleges (representing the 34 community and technical colleges) and the public and private four-year baccalaureate institutions.)

Locally designed associate degrees also intended for transfer by an individual college may not carry the DTA, AS-T, or DTA/MRP designated titles and/or abbreviations unless approved by the State Board transfer degree approval process and posted on the transfer degree inventory (see Transfer Degree Inventory).

Students may view the status of their transcript evaluation in ctcLink. JP will post transfer credits/units to the student's ctcLink record within a timeline determined by JP once the student has satisfied JP requirements for credential/transcript evaluation. JP will post information about evaluation timelines and requirements on JP websites.

3.13 Copyright Infringement Policies and Sanctions

Policy
JP **students and others who engage in unauthorized distribution of copyrighted material, including illegal Peer-to-Peer (P2P) file sharing, may be subject to civil and criminal liabilities.**

HEA Sec. 485(a)(1)(P)
34 CFR 668.14(b)(30), 34 CFR 668.43(a)(10)
DCL GEN-10-08
FSA Handbook Volume 2, Chapters 6 and 7

Procedure
File-sharing is the process of exchanging files over the Internet. One of the most common forms of file-sharing is using Peer-to-Peer (P2P) programs such as KaZaA, LimeWire or BitTorrent. Peer-to-Peer programs typically share files by default, to allow the maximum amount of sharing across the network.

Most P2P usage (which comprises a significant fraction of all file-sharing) is against the law because it involves the sharing of copyrighted materials without permission from the copyright owner (copyright infringement), usually music (MP3) or movie files, but also TV programs, books and images.

More information can be found at Copyright Guidelines.

3.14 Required Written Arrangements Disclosures

Policy
JP provides enrolled and prospective students with a description of the written arrangements they have entered into, including,

- The portion of the educational program that the institution that grants the degree or certificate is not providing,
- The name and location of the other institutions or organizations that are providing that portion of the educational program,
- The method of delivery of that part of the educational program, and
- Estimated additional costs students may incur by enrolling in an educational program provided under the written arrangement.

34 CFR 668.5
FSA Handbook Volume 2, Chapter 2

Procedure
JP enters into written arrangements with other institutions to,
- Provide access to courses at local institutions.
- Allow students to take courses at other institutions during the summer.
- Allow students to take a term or longer at another institution domestically or courses applicable to the student's degree at a foreign institution.
- Facilitate partnerships between institutions.

Key aspects:
- The institution that disburses aid must take into account all hours enrolled at each institution that applies to the student's degree program.
- The disbursing institution must also maintain all records that pertain to eligibility for aid.
- The home institution must accept coursework from a host institution that would be acceptable for the home institution's resident students.

- Grades from the host institution do not have to be included in the home institution's GPA for the student, but the credits/units must count when calculating the quantitative component of Satisfactory Academic Progress (SAP).
- Coursework taken without a consortium agreement does NOT have to be accepted by the home institution.
- Consortium agreement must stipulate which institution will offer and disburse the funds.

Home Institution:
- Is the institution that will grant the degree or certificate.
- The home institution may not decline a grade from the host institution if that grade would be acceptable if taken at the home institution.
- Determines eligibility for Title IV aid and is responsible for disbursement.
- Home institution agrees to treat coursework at the host institution:
    - In the same manner as if those courses were taken at the home institution; and
    - As counting toward degree completion at the home institution.

Host Institution:
- Provides coursework that will count toward the program of study at the home institution.
- Reports course completion or withdrawal information to the home institution.

There is no requirement that the student be enrolled for any coursework at the home institution while taking classes at the host institution.

3.15 Accrediting Agency Consumer Information

Policy
The State Board requires that college districts adhere to the requirements and procedures of the Northwest Commission on Colleges and Universities for all colleges operated by that district. The college district shall seek membership and accreditation status in the Commission for all new colleges at the earliest possible time following establishment of the college.

HEA Sec. 485(a)(1)(J)
34 CFR 668.43(a)(6) and (b)
FSA Handbook Volume 2, Chapter 6

Procedure
Policy Resources: Northwest Commission on Colleges and Universities.

In addition to JP regional accreditation by NWCCU, several programs have received accreditation specific to the program, and others operate under the approval of a national or state oversight agency as follows: JP

College	Program	Accreditation (In addition to NWCCU)

Centralia College	Nursing (RN)	National League for Nursing Commission for Nursing Education Accreditation (NLN CNEA)
	Nursing (RN)	Washington State Board of Nursing (WABON)
	Nursing Assistant	Washington State Board of Nursing (WABON)
	Emergency Medical Technician (EMT)	Washington Department of Health
	Medical Assistant	Washington Department of Health
	Commercial Driver License (CDL)	Washington Department of Licensing
	Phlebotomy	Washington Department of Health
	Teacher Education (K-8)	Office of the Superintendent of Public Instruction/

3.16 Vaccination Policy

Policy

JP does not have vaccine requirements for general education students enrolling at JP; immunizations are required for all programs that participate in Clinical Placement.

Immunizations are required in order to participate in clinical education. Individuals with allergies to required immunizations should seek expert advice from their health care provider so that they may receive information to make an informed decision regarding their exposure to infectious diseases in the health care field. A statement from the student's health care provider noting that the student may proceed through the program with no limitations will be required of all students declaring an immunization allergy.

HEA Sec. 485(a)(1)(V)
34 CFR 668.43(a)(18)
FSA Handbook Volume 2, Chapter 6

JP

Procedure

Nursing students must have proof of all the required immunizations on file with the Nursing Program before they can attend clinical. Students who need to update their immunizations may submit partial proof initially and then complete the process after the quarter starts but before beginning clinical rotations.

- MMR (Measles-Mumps-Rubella): proof of 2 MMR vaccinations in your lifetime or a positive titer indicating immunity to Measles, Mumps, and Rubella is acceptable.
- Tdap: proof of having received one Tdap (tetanus, diphtheria, acellular pertussis) booster immunization since 2006. Students are encouraged to be up to date on their tetanus vaccination as well, but it is not required.
- Varicella: proof of 2 varicella vaccinations in your lifetime or positive titer indicating immunity to varicella. The vaccination or titer may be waived (for varicella only) if your healthcare provider signs off, stating the date (m/d/y) that you had the disease (chicken pox).
- Hepatitis B (Hep B): proof of a positive titer indicating immunity to Hepatitis B or proof of at least the first Hep B vaccination in the sequence. It is the student's

responsibility to complete the sequence (3 injections and a positive titer indicating immunity) and submit proof to the Nursing Program. Students are required to complete the Hep B series while they are in the program before attending clinical rotations at a PeaceHealth facility.
- Influenza: required to obtain an influenza vaccine during flu season. Proof of vaccination must include the current season, the date of vaccination, and the practitioner/location where your vaccination was administered. Only medical exemptions are accepted in place of the yearly influenza vaccination. Contact the program manager for information about the medical exemption.
- COVID-19: fully vaccinated for COVID-19. To be considered fully vaccinated, two weeks must have passed since the date of the second dose or first dose for the one-dose vaccine. Proof of vaccination must include the vaccine you received and the date(s) of vaccination(s). Medical, religious, or philosophical exemptions cannot be accepted for clinical placement.

For more information, consult JPat JP.

<<Insert College Procedures>>

3.17 Consumer Information on College Navigator Website

Policy
JP provides a link to the institution's information on College Navigator on JP website. College Navigator is a consumer tool created by the U.S. Department of Education and its National Center for Education Statistics (NCES) so that consumers can evaluate U,S, colleges that receive Title IV funds.

College Navigator includes institutional data on programs offered, retention and graduation rates, prices, aid available, degrees awarded, campus safety, student loan defaults, and accreditation.

Procedure
JP information on the College Navigator website can be found at JP.

3.18 Student Body Diversity

Policy
JP makes information about student body diversity available to prospective and current students, including the percentage of enrolled, full-time students in the following categories,

- Male
- Female
- Self-identified members of major racial or ethnic groups
- Federal Pell Grant recipients

HEA Sec. 485(a)(1)(Q)

Procedure
Student Body diversity information is made available through JP website at JP.

3.19 Net Price Calculator

Policy
JP provides the Net Price Calculator (NPC) as a tool for students and parents to estimate the cost to attend JP.

HEA Sec. 132(h)(3) and (4)
FSA Handbook Volume 2, Chapter 6

Procedure
The Net Price Calculator (NPC) is best for full-time, first-time degree- or certificate-seeking students. It is an online tool that evaluates a family's current financial situation and their ability to pay for college. Please note that the estimate is based on <<Insert Award Year>> data and is intended for planning purposes only. Actual financial aid packages may differ based on the year the student applied, updated tuition rates, and changes in their financial circumstances.

- The estimate is based on full-time enrollment for 3 quarters at 15 credits/units per term.
- Housing and food costs are based on a standard single room and the platinum meal plan.
- "Other Expenses" include estimated transportation and personal costs.
- Required Fees reflect mandatory student fees JP but do not include course-specific or program-specific fees.

Tuition for some programs, such as JP, may differ from the standard rate and are not reflected in the Net Price Calculator. Private scholarships are not included in this estimate.

The calculator provides estimates for prospective undergraduate students. Results may not apply to international students, student-athletes receiving athletic scholarships, or students receiving tuition benefits such as employee remission.

The Financial Aid Policy Associate will share the necessary data for the Net Price Calculator (NPC) with colleges via the DirFinAid Listserv. The National Center for Education Statistics (NCES) typically releases the updated NPC template each January.

JP Net Price Calculators can be found at JP.

3.20 Textbook Information

Policy
JP discloses on JP website,
- Course schedule used for preregistration and registration purposes,

- The International Standard Book Number (ISBN) and retail price information of required and recommended textbooks and
- Supplemental materials for each course are listed.

HEA Sec. 133 (d)
FSA Handbook Volume 2, Chapter 6

Procedure
Textbook pricing can be found on JP Bookstore website at JP.

3.21 Voter Registration Information

Policy
JP makes a good-faith effort to distribute voter registration forms to its students. This requirement was included in the National Voter Registration Act of 1993.

JP makes the voter registration forms widely available to its students and individually distributes the forms to its degree- or certificate-seeking (FSA-eligible) students. This provision applies to general and special elections for federal office and to the elections of governors and other chief executives within a state.

HEA Sec. 487(a)(23)
FSA Handbook Volume 2, Chapter 6

Procedure
JP shall put in place an active prompt on its course registration website, or similar website that students actively and regularly use, that, if selected, will link the student to the secretary of state's voter registration website. The prompt must ask the student if he or she wishes to register to vote.

Students who are eligible to vote can register to vote and update their registration online or in person at their county's Supervisor of Elections office.

Voter Registration Information can be found on JP websites at, JP.

3.22 Constitution Day

Policy
Constitution Day (Section 111 of Division J of Pub. L. 108-447, the "Consolidated Appropriations Act, 2005," Dec. 8, 2004) will be held on September 17 of each year, commemorating the September 17, 1787, signing of the Constitution.

However, when September 17 falls on a Saturday, Sunday, or holiday, Constitution Day shall be held during the preceding or following week.

JP will hold an educational program on the United States Constitution on September 17 for each fiscal year in which it receives Federal funds for the students served by the institution.

Procedure
JP is responsible for the planning and implementation of Constitution Day events.

More information about Constitution Day can be found at https://www.constitutionday.com/.

More information about Constitution Day events at JP can be found at JP.

3.23 Drug and Alcohol Abuse Prevention Information

Policy
JP has adopted and implemented a drug and alcohol abuse prevention program.

JP is committed to a safe, healthy, and productive environment for its students and employees. Accordingly, JP prohibits the unlawful possession, use, manufacture, sale, or distribution of illicit drugs and alcohol by students and employees on its property or as part of any of its activities.

HEA Sec. 120 34 CFR 86.100(a)
34 CFR 668.43(a)(20)
FSA Handbook Volume 2, Chapter 6

Procedure
The components of the drug and alcohol abuse prevention programs, with information about where more material regarding drug and alcohol related issues can be found at, JP.

3.24 Student-Athlete Completion and Graduation Rate

Policy
JP annually makes available to prospective student athletes and the athlete's parent(s), high school guidance counselor(s), and coach(es) at the time the institution offers athletically related student aid a report that discloses completion/graduation rates and transfer-out information for students receiving athletically related student aid.

The information is available on July 1 of each year and sent to the U.S. Department of Education (ED), as required.

HEA Sec. 485(g)(3)
34 CFR 668.41(f)
FSA Handbook Volume 2, Chapter 6

Procedure
JP calculates the required numbers and distributes them by July 1st of each year to the appropriate JP offices.

This information can be found on JP website at JP and is also available upon request.

3.25 Athletic Program Participation and Financial Support Report

Policy

JP annually makes students and the general public aware of the institution's commitment to providing equitable athletic opportunities for male and female students.

The information is available on October 15 of each year and sent to the U.S. Department of Education (ED), as required.

HEA Sec. 485(g)
34 CFR 668.41(g)(2), 34 CFR 668.47
FSA Handbook Volume 2, Chapter 6

Procedure

The Report is posted on JP website at JP, and the information used in developing the report is provided to the U.S. Department of Education, which publishes it at Equity in Athletics Data Analysis.

A link to this report is provided to all students annually.

A hard copy of this report may be requested through JP Athletics Department and the Office of the Vice President for Student Affairs.

3.26 Completion and Graduation Rates

Policy

JP annually makes available to prospective and enrolled students the completion rate of certificate or degree-seeking, first-time, full-time, undergraduate students. The information is available on July 1 of each year for the most recent cohort that has had 150 percent of the normal time for completion before August 31 of the prior year.

HEA Sec. 485(a)(1)(L), 485(a)(7)
34 CFR 668.41(d)(4) , 34 CFR 668.45
FSA Handbook Volume 2, Chapter 6

Procedure

JP JP calculates the required numbers and distributes them by July 1st of each year to the appropriate JP offices.

This information is available on JP website at JP and is also made available to prospective and current students upon request.

3.27 Placement in Employment

Policy

JP provides information regarding the placement in employment of, and types of employment obtained by, graduates of the institution's degree or certificate programs available to current and prospective students.

HEA Sec. 487(a)(8)
34 CFR 668.14(b)(10) and 34 CFR 668.43(a)(14)

Procedure
Employment Placement information is made available through JP website at JP.

3.28 Retention Rate

Policy
JP makes the retention rate of certificate or degree-seeking, first-time, undergraduate students, as reported to Integrated Postsecondary Education Data System (IPEDS), available to current and prospective students.

This information is collected in the IPEDS Fall Enrollments Survey.

HEA Sec. 485(a)(1)(U)
34 CFR 668.41(d)(3) and 34 CFR 668.43(a)(17)
FSA Handbook Volume 2, Chapter 6

Procedure
Retention Rate information is made available through JP website at JP.

It is also available upon request by a prospective student and made available prior to the student enrolling or entering into any financial obligation with the institution.

3.29 Annual Security Report

Policy
JP distributes by October 1 each year a security report or notice of the report to all current students and employees. In addition, JP provides a notice to prospective students and employees regarding the report's availability, a description of its contents, and an opportunity to request a copy.

HEA Sec. 485(a)(1)(O), 485(f)(1)
34 CFR 668.41(e), 34 CFR 668.46(b)
FSA Handbook Volume 2, Chapter 6

JP Police (Campus Safety) Department is responsible for constructing institutional policies and procedures regarding security matters. The office also compiles, maintains, distributes, and submits the crime statistics to students, employees, and the U.S. Department of Education (ED), as required. Contact information is as follows: JP

College	Location	Emergency Phone Number	Non-Emergency Phone Number	Website
Skagit Valley College	Mount Vernon Campus Knutzen Cardinal Center, Room C-110 Whidbey Island Campus Old Main, Building B, Room 114		Mount Vernon Campus 360-416-7777 Whidbey Island Campus 360-679-5383	Security Services

Procedure
The dissemination of the Annual Security Report, including crime statistics, is sent to currently enrolled students and to all employees via email.

NOTE: The Stop Campus Hazing Act (SCHA) (S.2901, H.R.5646) passed into law on December 23, 2024. These statistics must be included in the Annual Security Report on October 1, 2026 (2025 statistics).

The Campus Safety Information and Disclosures can be found on JP website at JP.

3.29.1 Crime Log

Policy
JP maintains a written, easily understood daily crime log that records, by date, any crime that occurred within the Clery geography and that is reported to the campus police.

HEA Sec. 485(f)(5)
34 CFR 668.41(e)(5), 34 CFR 668.46(c)
FSA Handbook: Volume 2, Chapter 6

Procedure
JP Police (Campus Safety) Department updates the Crime Log regularly. The log contains a summary of police case reports and can be found at JP.

3.29.2 Timely Warning and Emergency Notifications

Policy
JP Police (Campus Safety) Department is responsible for issuing “timely warnings” in compliance with the Clery Act. JP crime alerts are issued in response to reported crimes that, in the judgment of JP, constitute an ongoing or continuing threat to students and employees. In serious situations where an imminent threat exists, an emergency notification may be issued, and a JP crime alert may not be necessary.

JP Crime Alerts are considered for crimes reported pursuant to the Jeanne Clery Act and may also be issued for other reported crimes as deemed appropriate under the circumstances. The decision will be made in compliance with the Clery Act and in an effort to prevent similar crimes from occurring.

Possible emergency situations include, but are not limited to, severe weather such as a hurricane or tornado, a fire or chemical spill on or near campus, bomb threats to the campus, or shooters or terrorist attacks on campus.

Procedure
When a determination is made that a JP crime alert should be issued, JP Police (Campus Safety) Department will take appropriate steps to ensure timely notification of the campus community and may engage other JP offices or personnel to assist in the dissemination of JP crime alert.

Options for notification include, but are not limited to:
- JP web page,
- JP Police (Campus Safety) Department's web page,
- Social media, including Facebook and X (fka Twitter),
- Cellular phone text messaging,
- Email,
- Internal telephone notification,
- Messaging on JP electronic newsletters, which come out daily and weekly,
- Local TV and radio stations,
- The local newspaper's web page, and
- Handing out or posting paper fliers on doors and bulletin boards.

Upon confirmation of a significant emergency or dangerous situation involving an immediate threat to the health and safety of the campus community, JP officials will determine the content of the notification and initiate the Emergency Notification System immediately.

3.30 Privacy of Student Records – Family Educational Rights and Privacy Act (FERPA)

Policy
JP provides an annual notice to all enrolled students about:
- The right to review their educational records, to request amendment of records, to consent to disclosures or personally identifiable information, and to file complaints with the U.S. Department of Education
- Procedures for reviewing educational records and requesting amendment of records
- If applicable, information about the institution’s policy regarding disclosures to institution officials with a legitimate educational interest in the educational records.

JP has the discretion to refuse to release a student's records to anyone other than the student.

HEA Sec 485(a)(1)
34 CFR 99.7, 34 CFR 668.41(c)
FSA Handbook Volume 2, Chapters 6 and 7

Procedure
If a student wants to review their records, they should submit a written request to JP JP identifying the records they wish to inspect. The JP will make arrangements for access and notify the student of the time and place where the records may be inspected.

If a student feels there is an error in their record, they should submit a written statement to the JP clearly identifying the part of the record they want changed and why they believe it is inaccurate or misleading. JP will notify the student of its decision. If JP decides not to amend the record, the student will be informed of their right to a hearing and be given additional information about hearing procedures.

FERPA directory information is information contained within a student's education record that, if disclosed, would not generally be considered harmful or an invasion of privacy. Directory information may be released without the student's explicit consent.

A single definition of directory information is important as ctcLink is implemented across the community and technical college system. The following categories of FERPA directory information serve as a global definition:
- Student's name
- Major field of study
- Enrollment status
- Dates of attendance
- Participation in recognized sports
- Degree or certificate earned
- Term degree or certificate awarded honors

Students will be provided with a single option to block all directory information instead of allowing the student to select individual categories. This will be done within ctcLink Student Self-Service, where a student will be provided with a single check box to block directory information from public disclosure (WACTC approval).

A FERPA block flag is added to all custom queries in ctcLink that contain the student's name or social security number to indicate if the student has requested a FERPA block.

Complaints may be filed with the U.S. Department of Education concerning alleged failures by JP to comply with the requirements of FERPA at,

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-5901

3.31 Fire Safety Report

Policy JP

JP has on-campus student housing; therefore, it must make an annual report to the campus community on the fires recorded in the fire log. The report includes statistics related to fire safety and occurrences of fire on its campus.

JP Fire Safety Reports can be found at JP.

HEA Sec. 485(i)(2)
34 CFR 668.41(e)(5), 34 CFR 668.49(c)
FSA Handbook Volume 2, Chapter 6

Procedure

The fire statistics include, for the three most recent calendar years,

1. The number of fires and the cause of each fire that occurs on campus.
2. The number of persons who received fire-related injuries that resulted in treatment at a medical facility, including at an on-campus health center.
3. The number of deaths related to a fire.
4. The value of property damage caused by a fire.
5. A description of each on-campus student housing facility's fire safety system.
6. The number of fire drills held during the previous calendar year.
7. The institution's policies or rules on portable electrical appliances, smoking, and open flames in a student housing facility.
8. The institution's procedures for student housing evacuation in the case of a fire, as applicable.
9. The policies on fire safety education and training programs provided to the students and employees. In these policies, the institution describes the procedures that students and employees should follow in the case of a fire.
10. For purposes of including a fire in the statistics in the annual fire safety report, a list of the titles of each person or organization to which students and employees should report that a fire occurred.
11. Plans for future improvements in fire safety, if found necessary by the institution.

3.31.1 Fire Log

Policy JP

JP has on-campus student housing; therefore, it must maintain a written, easily understood fire log that records by the date reported any fire that occurred in an on-campus student housing facility.

HEA Sec. 485(i)(3)(A)
34 CFR 668.49(d)
FSA Handbook Volume 2, Chapter 6

Procedure

The log must include the nature, date, time, and general location of each fire. JP must make an entry or an addition to an entry to the log within two business days of receiving the information.

The fire log must be open to public inspection during normal business hours for the most recent 60-day period. Any portion of the log older than 60 days must be available within two business days of a request for public inspection.

JP JP updates the Fire Log regularly. The log contains a summary of reported fires that occurred in an on-campus student housing facility and can be found at JP.

3.31.2 Missing Person Policy

Policy JP
JP has on-campus student housing; therefore, **it** must disclose, to enrolled students, its missing student notification policy.

HEA Sec. 485(j)
34 CFR 668.46(h)
FSA Handbook Volume 2, Chapter 6

Procedure
That policy must,

1. Indicate the title of persons or organizations to which reports should be made when a student has been missing for 24 hours.
2. Require any missing student report to be referred immediately to the institution's police or campus security or, in their absence, to the local law enforcement agency with jurisdiction.
3. Give a student the option to identify a contact person(s) who will be notified within 24 hours of the determination by campus security or local law enforcement that the student is missing.
4. Advise students that their contact information will be registered confidentially, will be accessible only to authorized campus officials, and that it may not be disclosed except to law enforcement investigating a missing person.
5. Advise students that if they are under the age of 18 and not emancipated, the institution must notify a custodial parent or guardian within 24 hours of when the students are determined to be missing (in addition to any other contact person they designated above); and
6. Inform students that the institution will notify local law enforcement within 24 hours of when a student is determined to be missing unless local law enforcement made that determination.

3.32 Student Loan Information

Policy
JP provides information, published by the U.S. Department of Education, to students at any time that information regarding loan availability is provided.

Procedure
JP directs students to the Federal Student Aid website at https://studentaid.gov/. The website includes information about the rights and responsibilities of students and institutions under Title IV, HEA loan programs.

3.32.1 National Student Loan Data System (NSLDS)

Policy
JP informs the student or parent that their loan will be submitted to the National Student Loan Data System (NSLDS), and will be accessible by guaranty agencies, lenders, and institutions determined to be authorized users of the data system.

In addition, JP website provides a link to StudentAid.gov.

Procedure
Students and parents have access to their own loan information on StudentAid.gov. Students and parents need to create and use their FSA User ID and password to log in.

3.32.2 Entrance Counseling for Student Loan Borrowers

Policy
JP provides a **first-time borrower** of a Federal Direct Loan (other than consolidated or Parent PLUS loans), prior to the **first disbursement**, with comprehensive information on the terms and conditions of the loan and of the borrower's responsibilities.

In addition, JP website provides a link to the FSA Student Loan Entrance Counseling.

HEA Sec. 463A(a), 485(l)
34 CFR 685.304(a)
FSA Handbook Volume 8, Chapter 2

Procedure
JP directs students to the Federal Student Aid website at https://studentaid.gov/entrance-counseling/. The website includes information to ensure students understand the terms and conditions of their loan and their rights and responsibilities. They learn what a loan is, how interest works, their options for repayment, and how to avoid delinquency and default.

3.32.3 Exit Counseling for Student Loan Borrowers

Policy
JP provides information to each Direct Subsidized Loan or Direct Unsubsidized Loan borrower, shortly before the student borrower graduates or ceases to study at least half-time at the institution, student loan exit counseling information.

In addition, JP website provides a link to the FSA Student Loan Exit Counseling.

HEA Sec. 485(b)(1)(A)

34 CFR 668.42(c)(6), 34 CFR 674.42(b), 34 CFR 685.304(b)
FSA Handbook, Volume 8, Chapter 2

Procedure
JP directs students to the Federal Student Aid website at https://studentaid.gov/exit-counseling/. The website includes information to ensure students understand their student loan obligations and are prepared for repayment. They will learn about what their federal student loan payments will look like after graduation or ceasing to be enrolled on at least a half-time basis. FSA will recommend a repayment strategy that best suits the student's future plans and goals.

3.33 Private Education Loans

Policy
JP Financial Aid Office processes private (alternative) loans. JP also provides information to the prospective borrower, including:

- Information required under Section 128(e) of the Truth in Lending Act (15 U.S.C. 1638(e));
- That the prospective borrower may qualify for loans or other assistance under the Title IV, HEA programs;
- That the terms and conditions of the Title IV, HEA program loans may be more favorable than the provisions of the private education loans.

Procedure
JP directs students to its website for information about Private Education Loans.

3.33.1 Self-Certification Form

Policy
JP provides information to prospective borrowers about Private Education Loans and must upon request provide in written or electronic form to an enrolled or admitted student applicant for a private education loan the self-certification form for private education loans required under Section 128(e)(3) of the Truth in Lending Act (15 U.S.C. 1638(e)(3)), and the information required to complete the form, to the extent the institution possesses the information. The U.S. Department of Education is required to develop the form.

Procedure
The self-certification form for private education loans can be found at https://fsapartners.ed.gov/sites/default/files/2023-06/H450PrivateEducationLoanApplicantSelfCertificationForm.pdf.

3.33.2 Code of Conduct for Education Loans

Policy
JP is not permitted to recommend any specific lender for private education loans and do not have a Preferred Lender List. Therefore, JP is not required to publish a Code of Conduct for Education Loans on its website.

HEA Sec. 153(c)(3), 487(a)(25) and (e)
34 CFR 601.21, 34 CFR 668.14(b)(27)
FSA Handbook Volume 2, Chapter 3

Procedure
JP is not required to publish a Code of Conduct for Education Loans on its website.

3.33.3 Private Education Loan Disclosures

Policy
JP is not permitted to recommend any specific lender for private education loans and does not have Preferred Lender Arrangements.

HEA Sec. 152(a)(1)(B), 155, 487(a)(28)
34 CFR 601.11, 34 CFR 601.30, 34 CFR 668.14(b)(29)
FSA Handbook Volume 2, Chapter 6

Procedure
JP is not required to publish Private Education Loan disclosures on its website.

3.33.4 Preferred Lender Lists

Policy
JP is not permitted to recommend any specific lender for private education loans and does not have Preferred Lender Arrangements.

Procedure
In most cases, JP directs students to ElmSelect. ElmSelect is an online, lender-neutral platform that provides students with an unbiased search for private Student Loans. It allows students to compare private loans for their institution and their degree. Students can find loan rates and terms that meet their needs. It is a free service with no registration.

3.33.5 Preferred Lender Arrangements

Policy
JP is not permitted to recommend any specific lender for private education loans and does not have Preferred Lender Arrangements.

Procedure
JP does not have Preferred Lender Arrangements.

3.33.6 Annual Report on Preferred Lender Arrangements

Policy
JP is not permitted to recommend any specific lender for private education loans and does not have Preferred Lender Arrangements.

Procedure

JP is not required to publish on its website or report to the U. S. Department of Education an Annual Report on Preferred Lender Arrangements.

Section 4: Institutional Eligibility (Reporting & Reconciliation)

4.1 Overview and General Requirements

A college must apply to and receive approval from the U.S. Department of Education to be eligible to participate in the Title IV programs before it can be certified for participation. If circumstances change and a participating school no longer qualifies as an eligible institution, it must notify the U.S. Department of Education and carry out closeout procedures.

The law defines three kinds of eligible institutions (34 CFR 600.4, 34 CFR 600.5, 34 CFR 600.6): institutions of higher education, proprietary institutions of higher education, and postsecondary vocational institutions. JP is classified as an institution of higher education because it offers:

- Bachelor's degree programs;
- Associate degree programs; and
- A training program of at least one year that leads to a certificate or other non-degree recognized credential and prepares students for gainful employment in a recognized occupation.

In addition, institutions must meet basic criteria to be considered eligible to participate in Title IV programs. JP is considered an eligible institution to participate in the Title IV programs because it:

- Is legally authorized by a state to provide a postsecondary education program within that state;
- Is accredited by a nationally recognized accrediting agency; and
- Admits as regular students individuals who have a high school diploma or its recognized equivalent, or individuals beyond the age of compulsory school attendance in the state where the institution is located. Alternatively, students may become eligible for Title IV aid through the Ability to Benefit (ATB) alternatives in one of two ways:
    - If a student first enrolled in an eligible postsecondary program prior to July 1, 2012 (regardless of receipt of any Title IV aid), the student may enroll in any eligible program and become eligible through one of the ATB alternatives;
    - However, if a student first enrolled in an eligible postsecondary program on or after July 1, 2012, the student may only become eligible through one of the ATB alternatives if the student is enrolled in an “eligible career pathway program”.

An ATB student need not be enrolled concurrently in both the eligible postsecondary program and the component for attaining a high school diploma or its recognized equivalent.

The ATB alternatives include:

- Passing an independently administered U.S. Department of Education approved ATB test;
- Completing at least six credit/unit hours or 225 clock hours that are applicable toward a Title IV-eligible degree or certificate offered by the postsecondary institution (neither remedial nor developmental coursework count toward this requirement). The coursework must demonstrate that the student has the ability to benefit from the postsecondary program in which the student is enrolled or intends to enroll, but need not be applicable to the specific degree or program in which the student is enrolled; and
- Completing a state process approved by the Secretary of Education. Note: To date, state processes have been approved by the Secretary for the states of Washington, Illinois, Iowa, Mississippi, Minnesota and Wisconsin.

4.2 State Authorization and Licensure

34 CFR 600.9

Policy
JP has the authority to operate in the state of Washington by the State Board for Community and Technical Colleges (SBCTC). SBCTC authorizes the establishment and operation of JP educational programs beyond secondary education, including programs leading to a degree or certificate. SBCTC also has specific approval of JP degree programs, while the overall operating authority and structure are established by state legislation and the SBCTC staff. JP can be found on the Washington State Board for Community and Technical Colleges (SBCTC) website and is governed locally by its Boards of Trustees.

JP

JP meets Washington State's requirements to offer postsecondary distance education. JP has developed a seamless articulation system to facilitate efficient and effective progression and transfer of students between institutions through agreements with postsecondary public institutions as well as private colleges and universities.

Procedure
The JP is responsible for administering all phases of the institutional operations that meet the standards set forth by the State of Washington.

The JP is responsible to ensure that the appropriate state authorizations and licensures are kept current.

The JP is responsible for submitting the required documentation to the U.S. Department of Education.

State Authorization and Distance Education
34 CFR 600.9(c)(1)(i) and (ii)

1. State Complaint Process

   Each state must have a process to review and act on complaints concerning a school, which must provide the contact information for filing those complaints to enrolled and prospective students. JP follows these procedures:
   - Washington Student Achievement Council (WASC) Student Complaints
     - WASC Student Complaint Portal
   - SBCTC Online Student Complaint Resolution Process
     - SBCTC Student Complaint Portal
   - SBCTC Notification of Title IV Student Complaint Process
   - JP Complaint Form JP
     - Example:
       - Pierce College Complaint Process:
       - Pierce College Online General Complaint Form

2. Determining Student Location – 34 CFR 600.9(c)(2)
   - State Authorization Reciprocity Agreement (SARA)– a school must determine which state its students are located in so that it can ensure that it complies with each state's authorization requirements.

4.3 Accreditation

Institutions of Higher Education – 34 CFR 600.4(a)(5)(ii)
Postsecondary Vocational Institutions – 34 CFR 600.6(a)(5)(ii)

Policy
JP primary accrediting agency is the Northwest Commission on Colleges and Universities (NWCCU), which awards associate and baccalaureate degrees. JP also may offer credentials such as certificates and diplomas at approved degree levels.

Accreditation Information
- Status – JP
- Accreditation Granted – JP
- Reaffirmation - JP
- Distance Education Approval Date - JP
- Next Reaffirmation – JP
- Next Fifth-Year Review – JP

Approved Additional Locations
- JP

JP is also accredited by the following programmatic accrediting agencies (taken from JP Consumer Information). These accreditation agencies are discipline-specific, and their accreditation authority applies only to the program under their review.

Program	Accrediting Body	Date of Last Review	Accreditation Status
JP			

JP complies with all appropriate consumer information reporting requirements. The accreditation information and Consumer Information are disclosed on JP website JP and College Catalog.

JP publishes in the College Catalog, or provides in a manner available to students and other stakeholders, current and accurate information that includes, but not limited to:

- Institutional mission;
- Admission requirements and procedures;
- Grading policy;
- Information on academic programs and courses, including degree and program completion requirements, expected learning outcomes, required course sequences, and projected timelines to completion based on normal student progress and the frequency of course offerings;
- Names, titles, degrees held, and conferring institutions for administrators and full-time faculty;
- Rules and regulations for conduct, rights, and responsibilities;
- Tuition, fees, and other program costs;
- Refund policies and procedures for students who withdraw from enrollment;
- Opportunities and requirements for financial aid; and
- The academic calendar.

Procedure
The JP is responsible for administering all phases of the institutional operations that meet the standards set forth for all accreditation agencies.

The JP is responsible for ensuring that the appropriate accreditations are kept current.

The JPs responsible for submitting the required documentation to the U.S. Department of Education.

4.4 Admissions Standards

Policy
An **eligible institution** may admit as regular students, persons who have a high school diploma or its recognized equivalent, are beyond the age of compulsory school attendance in the state in which the school is located or are dually enrolled in college and a secondary school 34 CFR 600.4(a)(2).

An **eligible student** must have a high school diploma, or its recognized equivalent OR meet ATB (Ability to Benefit), or be beyond the age of compulsory attendance and meet the criteria for homeschooled students. A student dually enrolled in high school and college is not eligible for Title IV funds.

Please Note: Non-high school graduates possessing certificates of completion or special diplomas are eligible to enroll in certain certificate courses only. These students are not eligible for federal financial aid, they may be eligible for limited forms of state (as per state requirements) and institutional financial aid (2024-2025 FSA Handbook, Volume 1, Chapter 1)

JP

Regular Student – 34 CFR 600.4(a)(2)
A regular student is a person who is enrolled or accepted for enrollment in an eligible program at an institution for the purpose of obtaining a degree, certificate, or other recognized educational credential offered by the institution.

- If a person is not yet beyond the age of compulsory school attendance in the state where the college is physically located, they may only be enrolled as a regular student if they:
    - Have a high school diploma or its equivalent; or
    - Are dually enrolled in high school and college.

Note: This definition may differ from the admissions definition of a regular student.
High School Graduates and Eligibility for College Credit Programs
Students are eligible for admission to college credit programs and courses at JP if they meet one of the following criteria:

- Earned a high school diploma from a secondary school with regional or accepted national accreditation;
- Earned a state-issued General Education Diploma (GED);
- Completed one of the Ability-to-Benefit (ATB)/Career Pathways Program alternatives;
- Currently enrolled in an eligible career pathway program – 34 CFR 668.2 – Effective July 1, 2024;
- Achieved a passing score on the High School Equivalency Test (HiSET), the Test Assessing Secondary Completion (TASC), or the California High School Proficiency Exam, or a combination of passing scores on HiSET, TASC, or GED subtests;
- In the case of home-schooled students in the state of Washington:
    - Submission of a signed, notarized affidavit submitted by the student's parent or legal guardian attesting that the student has completed a home education program pursuant to the requirements of JP is required.
    - This affidavit must be accompanied by documentation by the appropriate school board demonstrating that the home school was registered in the county in which the home school was administered.
    - For students under a home school "umbrella" organization, submission of a final, official transcript must be submitted from the umbrella service in addition to the home school affidavit.
- In the case of home-schooled students from states other than Washington:

    - Documentation showing the home-school program was completed in compliance with their state's rules and regulations.
- Submission of an official, final college transcript from a regionally or nationally accepted, accredited college, university, or other postsecondary institution showing completion of college-level English and Math.
- College credit awarded by passing English and Math exams administered by Advanced Placement (AP), International Baccalaureate (IB), Cambridge AICE, College-Level Examination Program (CLEP), or DANTES, as determined by the Office of the Registrar.
- For International students: evidence of an equivalent to a U.S. secondary school education and meeting language standards established through College Procedure.

Procedure
Students may submit high school transcripts, test scores, and residency documents to JP Office of Admissions as follows:

1. Submission of final, official High School Transcript, HiSET, GED®**,** TASC, CHSPE, or Homeschool Affidavit.
    - High School Transcript:
        - May be submitted via JP electronic system, directly from the high school via the mail, or delivered in person to JP Office of Admissions located at JP.
        - Official transcripts **cannot** be faxed or scanned – they must be the original copy from the high school.
    - *HiSET®*: Must submit a copy of the HiSET certificate that was earned and/or a copy of the transcript showing that each section of the exam was passed.
    - GED®: Must submit a copy of the diploma that was earned and/or a copy of the test scores, which show that all sections of the GED® test were passed.
    - TASC: must submit a copy of the TASC certificate that was earned and/or a copy of the transcript showing that each section of the exam was passed.
    - CHSPE: Must submit a copy of the CHSPE score report or the certificate of proficiency showing that both sections of the exam were passed.
    - Homeschool Affidavit: Must be notarized prior to submission to JP.

2. Students who graduated from a high school outside of the U.S. must demonstrate proof of completion of a level of education that is equal to or higher than a U.S. high school diploma.
    - To complete this step, send official high school transcripts to a NACES-accredited credential evaluation company or an AICE-accredited credential evaluation company for verification, translation, **and evaluation**—request to have evaluation reports sent directly to JP Office of Admissions.
    - Students requesting an evaluation of secondary or high school transcripts/diplomas need to order a *Document by Document* (General) evaluation.

3. Submission of AP, IB, or CLEP Test Scores
    - Submit all Advanced Placement (AP), International Baccalaureate (IB), or College-Level Examination Program (CLEP) test scores to JP Registrar's Office.

You may accept self-certification that a student has completed a foreign high school (or equivalent) education if it is impossible for a refugee, asylee, or victim of human trafficking to obtain documentation of their completion of a secondary school education in a foreign country. In this case, the applicant must:

- Present their entry status documentation that demonstrates their current or prior status as a refugee, asylee, or victim of human trafficking who entered the U.S. after the age of 15; and
- Provide proof of their attempt to obtain documentation of their completion of a secondary school education in a foreign country, i.e. a copy of an e-mail or letter (including proof of mailing) (see item FHD-Q2/ A2 at www2.ed.gov/policy/highered/reg/hearulemaking/2009/hsdiploma.html)

For more information, contact the Office of Admissions regarding admission to JP, deadline dates for submission of applications, and all forms necessary for admission to JP:

- Location – << Insert College Information>>
- Phone – << Insert College Information>>
- Website – << Insert College Information>>

34 CFR 668.14
FSA Handbook, Volume 2, Chapter 1 (Institutional Eligibility) and Chapter 5 (Updating Application Information)

4.5 Program Participation Agreement (PPA)

34 CFR 668.14

Policy
JP must have a current Program Participation Agreement (PPA) to be eligible for Title IV programs, signed by its president, chief executive officer, or chancellor and an authorized representative of the Secretary of Education.

By entering into the PPA, JP agrees to comply with the laws, regulations, and policies governing the Title IV programs. JP also agrees that it will comply with the provisions of 34 CFR Part 668, Subpart L, relating to factors of financial responsibility and that it will comply with the provisions of 34 CFR 668.16 relating to standards of administrative capability. In addition, to ensure financial responsibility, the U.S. Department of Education may, in certain cases, require signatures from corporations or other legal entities that have, or could have, a direct or indirect effect on JP financial responsibility.

Refer to Electronic Announcement (GENERAL-22-16) and Electronic Announcement (GENERAL-23-11) for more information about signature requirements.

Note that the Program Participation Agreement (PPA) and the Electronic Application (E-App) are not the same thing. The E-App is used to apply to participate in the Title IV programs initially (which results in a PPA) and to update a current approval. The E-App is also used for recertification, reinstatement, change in ownership, and designation as an eligible nonparticipating institution.

The effective date of a school's approval is JP.

The date the approval expires is JP.

The date by which the school must reapply for participation is JP.

The Title IV programs in which the school is eligible to participate are:
- Federal Pell Grant;
- Certain Dependents of Deceased Servicemembers or Public Safety Officers (Special Rule for Pell Grants);
- TEACH Grant;
- Federal Supplemental Educational Opportunity Grant;
- Federal Work-Study; and
- Federal Direct Loan Program.

The following are the school-specific requirements in the PPA:
- General Terms and Conditions:
    - JP certifies that it will comply with
        - *Title VI of the Civil Rights Act of 1964*, as amended, barring discrimination on the basis of race, color, or national origin;
        - *Title IX of the Education Amendments of 1972*, barring discrimination on the basis of sex;
        - The *Family Educational Rights and Privacy Act (FERPA) of 1974*;
        - Section 501 and 505(b)(2) of the *Gramm-Leach Bliley Act*, on safeguarding information;
        - Section 504 of the *Rehabilitation Act of 1973*, barring discrimination on the basis of physical handicap (34 CFR Part 104); and
        - The Age Discrimination Act of 1975 (34 CFR Part 110).
    - JP acknowledges that the U.S. Department of Education, states, and accrediting agencies may share information about the school without limitation.
    - JP must agree to submit any dispute involving an adverse action, such as the final denial, withdrawal, or termination of accreditation, to arbitration before initiating any other legal action.

- General Provisions:
    - JP will use funds received under any Title IV program, as well as any interest and other earnings thereon, solely for the purposes specified for that program.

- If JP is permitted to request Title IV program funds under an advance payment method, JP will time its requests for funds to meet only JP immediate Title IV program needs.
- JP will not charge for processing or handling any application, form, or data used to determine a student's Title IV eligibility.
- JP will establish administrative/fiscal procedures and reports that are necessary for the proper and efficient management of Title IV funds, and it will provide timely information on its administrative capability and financial responsibility to the U.S. Department of Education and to the appropriate state, guaranty, and accrediting agencies.
- JP must acknowledge the authority of the U.S. Department of Education and all Federal agencies and State attorney general to share information regarding fraud, abuse, or the school's eligibility for participation in Title IV programs (see Chapter 8).
- JP must, in a timely manner, complete reports, surveys, and any other data collection effort of the Department, including surveys under the Integrated Postsecondary Education Data System (see Chapter 6).
- If JP advertises job placement rates as a means of attracting students to enroll in the institution, the school will make available to prospective students (at or before the time that those students apply for enrollment) the most recent available data concerning employment statistics, graduation statistics, and any other information necessary to substantiate the truthfulness of the advertisements and the relevant State Experimental Sites The Experimental Sites Initiative permits statutory and regulatory flexibility for schools participating in the experiments. This gives the U.S. Department of Education data for judging the effectiveness of certain laws and regulations and whether they should be changed. For example, the Second Chance Pell Experiment allows participating colleges to provide Federal Pell Grant funding to otherwise eligible students who are incarcerated in Federal or State penal institutions. Visit the ESI website for more information and to review a listing of other experiments. licensing requirements of the State in which the institution is located for any job for which the course of instruction is designed to prepare such prospective students (see 34 CFR 668.501 Subpart R).
- JP cannot penalize in any way a student who is unable to pay school costs due to compliance with the Title IV program requirements or due to a delay in a Title IV loan disbursement caused by the school.
- JP must comply with the program integrity requirements established by the U.S. Department of Education, state authorizing bodies, and accrediting agencies.
- JP is liable for all improperly administered funds received or returned under the Title IV programs, including any funds administered by a third-party servicer.
- If the program offered by JP is preparing students for gainful employment in a recognized occupation, JP will:

        - Demonstrate a reasonable relationship [as defined in 34 CFR 668.14(b)(26) with recent updates explained in Dear Colleague Letter GEN-24-06] between the length of the program and entry-level requirements for the recognized occupation; and
        - Establish the need for training students to obtain employment in a recognized occupation.

- Certifications:
    - Three certifications are included in the PPA:
        - Lobbying; Debarment, Suspension, and other responsibility matters; and Drug-Free Workplace Requirements.
        - Drug Prevention Certification.
        - Certification regarding Debarment, Suspension, Eligibility, and Voluntary Exclusion—lower-tier covered transactions.

- Direct Loans:
    - JP will not charge any fees of any kind to student or parent borrowers for loan application, origination activities, or the provision and processing of any information needed to receive a Direct Loan.
    - The note or evidence of obligation of the loan shall be the property of the Secretary.
    - JP accepts responsibility and financial liability stemming from its failure to perform its functions under the PPA.

- Additional Requirements:
    - In addition to the requirements listed on the PPA, JP must meet any requirements for participation in the General Provisions (34 CFR Part 668), as well as those specific to an individual Title IV program:
        - Federal Pell Grant Program—20 USC 1070a et seq., 34 CFR Part 690
        - Federal Direct Student Loan Program—20 USC 1087a et seq., 34 CFR Part 685
        - Federal Supplemental Educational Opportunity Grant Program—20 USC 1070b et seq., 34 CFR Part 676
        - Federal Work-Study Program—42 USC 2751 et seq., 34 CFR Part 675

Procedure
The Electronic Application (E-App) is used to apply to participate in the Title IV programs initially (which results in a PPA) and to update a current approval; it's also used for recertification, reinstatement, change in ownership, and designation as an eligible nonparticipating institution. JP must submit updates through the E-App within 10 business days of the change required by 34 CFR 600.20(g)(2)(i)-(iv).

The JP is responsible for updates to the E-App.

Recertification Process - 34 CFR 600.200(b) and (f) JP may be certified to participate for up to six (6) years. The recertification process through which JP is presently certified to participate in the Title IV programs applies to having its participation extended beyond the expiration date of its current Program Participation Agreement (PPA). JP will be notified six months prior to the expiration of its PPA by the U.S. Department of Education. JP will then submit its materially complete the application to the U.S. Department of Education no later than 90 calendar days before its PPA expires.

The JP is responsible for recertification, reinstatement, change in ownership, and designation as an eligible nonparticipating institution, as applicable.

4.6 Eligibility and Certification Approval Report (ECAR)

Policy

The Eligibility and Certification Approval Report (ECAR) that the U.S. Department of Education sends to the school lists the educational programs and locations that are eligible. Each year, the U.S. Department of Education publishes the Eligibility and Certification Approval Report (ECAR) of financial aid eligible programs at each college or university. Under the ECAR, certain credit and non-credit certificate programs are financial aid eligible. The ECAR includes:

1. **Institutional Information**: essential details about the institution, such as its name, address, and identification numbers.
2. **Program Listings**: a listing of all the educational programs that are eligible for federal student aid, along with their respective program lengths and other relevant details.
3. **Accreditation and Licensing**: information about the institution’s accreditation and state licensing, which are prerequisites for federal student aid eligibility.
4. **Eligibility Criteria**: the criteria under which the institution has been deemed eligible to participate in federal student aid programs.

JP Title IV eligibility extends to all eligible programs and locations on its ECAR. In addition, the school’s eligible non-degree programs and locations are specifically named on the ECAR.

Procedure

The JP is responsible for reviewing the ECAR.

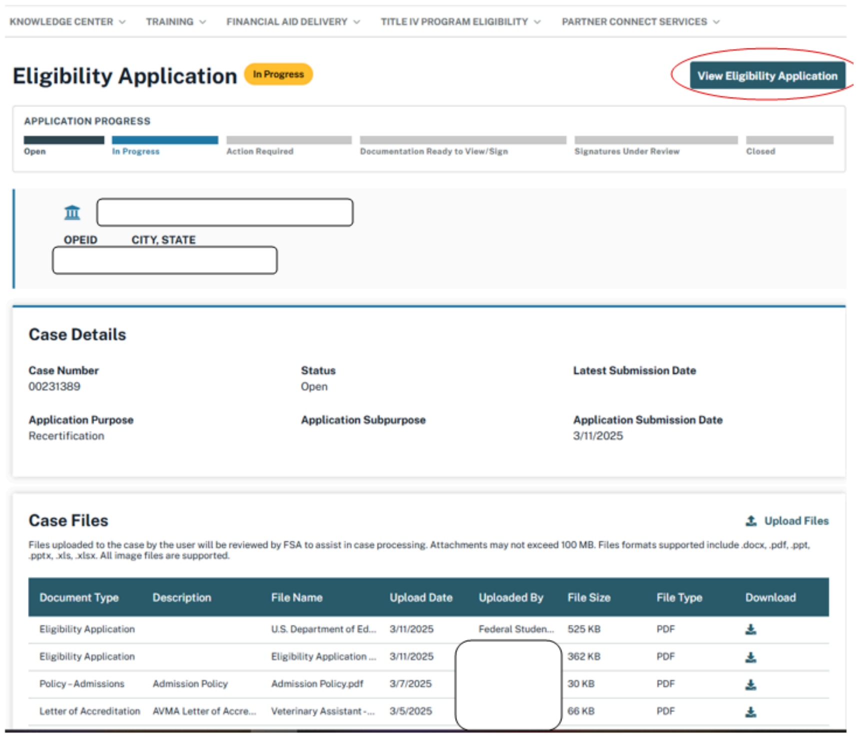
The JP is responsible for updating the ECAR.

Additional locations and programs may be added after receipt of the ECAR. Once the School Participation Division (SPD) has approved the program/location, it will notify the school and an updated ECAR can be printed.

For new gainful employment programs, the school must additionally update the ECAR within 10 days of receiving final approval from its accreditation agency, governing authority, and other oversight bodies to make the change.

To access the ECAR using the FSA Partner Connect website, follow these steps:

1. Go to the FSA Partner Connect **website.**
2. Click on the “Log In” button found at the top right corner of the page.
3. Enter your credentials.
4. On the homepage, click on the “View Eligibility Application” button to view the current or in-progress ECAR.



4.7 Reporting and Reconciliation

Cash Management regulations:
34 CFR Part 668 Subpart K
668.162 Requesting funds

Financial responsibility regulations:
34 CFR Part 668 Subpart L

4.7.1 Reporting

Policy

JP provides all program reports, fiscal reports, and financial statements required for compliance with Title IV program provisions and Washington State reporting guidelines.

Federal Reports:

- Fiscal Operations Report and Application to Participate (FISAP)
  34 CFR 673.3, 674.19(d)(2), 675.19(b)(3), 676.19(b)(3)
  - o Due date: October 1 (or the Friday before if October 1 falls on a weekend) unless a different deadline is established by the U.S. Department of Education in the Federal Register.
  - o Recipient: Federal Student Aid
  - o Method of transmittal: https://cod.ed.gov
  - o Purpose: The FISAP is an electronic report that JP submits annually to account for campus-based program activity (FSEOG, FWS, Perkins Loan) for the prior award year (ending June 30) and to apply for future campus-based funding.
  - o Resources: FISAP Form and Instructions

- Integrated Postsecondary Education Data System (IPEDS) survey
  HEA Sec. 132(3), 487(a)(17)
  FSA Handbook Volume 2, Chapter 6
  - o Due date: Exact dates may change from year to year
    - ▪ February: student financial aid, graduation rates, 200% graduation rates, admissions, outcome measures
    - ▪ April: fall enrollment, finance, human resources, academic libraries
    - ▪ October: institutional characteristics, completions, 12-month enrollment
  - o Method of transmittal: https://surveys.nces.ed.gov/ipeds
  - o Recipient: NCES (National Center for Education Statistics)

- National Student Loan Database System (NSLDS)
  34 CFR 690.83(b)(2); 34 CFR 682.610(c)
  Reporting Enrollment Changes to NSLDS: 34 CFR 685.309(b); DCL GEN-13-02
  Financial Aid History and Transfer Monitoring: 34 CFR 668.19; DCL GEN-01-09
  - o Due date: Report enrollment changes within 30 days; however, if a roster file is expected within 60 days, you may provide the updated data on that file
  - o Recipient: Federal Student Aid
  - o Method of transmittal: https://nsldsfap.ed.gov/login
  - o Purpose: For enrollment reporting, Transfer Student Monitoring, and reporting overpayments. JP is required to report enrollment information under the Pell Grant, Direct Loan, and Federal Family Education Loan programs via the NSLDS. JP must review, update, and verify student enrollment statuses, program information, and effective dates that appear on the Enrollment Reporting Submittal file or on the Enrollment Maintenance page of NSLDS. There are two categories of enrollment information: Campus Level and Program Level, both of which need to be reported accurately and have separate record types. JP is responsible for accurately reporting all data elements under the:
    - ▪ Campus-Level Record
      - OPEID Number

            - Enrollment Effective Date
            - Enrollment Status
            - Certification Date
        - Program-Level Record
            - OPEID Number
            - Classification of Instructional Program (CIP) Code
            - CIP Year
            - Credential Level
            - Published Program Length Measurement
            - Published Program Length
            - Program Begin Date
            - Program Enrollment Status
            - Program Enrollment Effective Date

    - Resources/Guidance: NSLDS Enrollment Reporting Guide; CIP Codes; Electronic Announcement dated April 10, 2017

- Financial Value Transparency (FVT) and Gainful Employment (GE)
  Final Register Publication Date Oct 10, 2023: Final Regulations: FVT and GE 34 CFR Parts 600 and 668
    - Due date: October 1
    - Recipient: Federal Student Aid
    - Method of transmittal: https://nsldsfap.ed.gov/login
    - Purpose: The FVT regulations are designed to improve the quality and availability of information provided directly to students about the costs, sources of financial aid, and outcomes of students enrolled in all Title IV, HEA (Title IV) eligible programs. JP will need to annually report two types of data to NSLDS (student-specific and program-specific data) to enhance transparency and effectiveness in postsecondary education. The regulations establish two metrics: evaluating a program's debt-to-earnings (D/E) and earnings premium (EP), which are benchmarks to determine whether the program may have adverse financial consequences for students. These requirements apply to both GE Programs and eligible Non-GE Programs.

- Federal Work-Study (FWS) Reporting
    - Due date: October 1
    - Recipient: Federal Student Aid
    - Method of transmittal: Common and Origination Disbursement (COD) https://cod.ed.gov
    - Purpose: Starting with 2024-2025, colleges are required to report FWS earnings by student to COD. The method used to report FWS earnings is by calendar year.

- Equity in Athletics Disclosure Act (EADA) Report
    - Due date: Annual reporting

- Recipient: Federal Student Aid
- Method of transmittal: Via the EADA survey website annually
- Purpose: A college that has an intercollegiate athletic program to make prospective students aware of its commitment to provide equitable athletic opportunities for its male and female students.

- Annual Security and Fire Safety Report
  - Due date: Annual reporting
  - Recipient: Federal Student Aid
  - Method of transmittal: https://surveys.ope.ed.gov/campussafety/#/
  - Purpose: Submission of college statistics for crimes and fire safety for the three most recent calendar years for which data is available. The data collection is required by the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act and the Higher Education Opportunity Act.

- Audits
  34 CFR 668.23
  FSA Handbook Volume 2, Chapter 4
  - Due date: the earlier of 30 calendar days after receipt of the audit report, or nine months after the end of the audit period
  - Method of transmittal: eZ-Audt https://ezaudit.ed.gov
  - Recipient: Federal Student Aid
  - Purpose: The audits must be conducted in accordance with the Generally Accepted Accounting Principles (GAAP)

State Reports:
The following are reports for participation in the Washington College Grant
- Interim Reporting – is a quarterly reporting requirement Washington Student Achievement Council (WSAC). The due dates for these reports vary each year. Review the most recent WCG manual for specific due dates.
- Unit Record Report – is a student-specific report of financial aid offered to resident and nonresident students typically due the middle of October each year, Washington Student Achievement Council (WSAC).

Procedure
Fiscal Operations Report and Application to Participate (FISAP)
- The JP is responsible for preparing the data for items on Parts II through V of the FISAP by generating the appropriate queries/reports in ctcLink.
- The Financial Aid Director completes and submits the FISAP by September 30th. Corrections to the FISAP are completed by December 15th.
- References:
  - ctcLink Reference Process Guide

Integrated Postsecondary Education Data System (IPEDS) Survey
- The JP is responsible for completing the IPEDS surveys.

National Student Loan Database System (NSLDS)

- Enrollment Reporting:
    - JP contracts with the National Student Clearinghouse (NSC) for enrollment reporting.
    - The JP is responsible for submitting and transmitting the enrollment reporting.
        - Refer to the ctcLink Reference Center for instructions on how to generate an NSC Report.
- Overpayments
    - The JP is responsible for reporting overpayments to NSLDS.

Gainful Employment (GE) and Financial Value Transparency (FVT)

- The JP is responsible for annually reporting data (student-specific and program-specific data) via the Student Aid Internet Gateway (SAIG) through online reporting, or the spreadsheet submittal process via the NSLDS Professional Access website

  <<Insert College Procedures>>

Undergraduate programs: Compares the median earnings of completers 4 years after program completion with the earnings of “working adults” with only a high school degree or GED who are not enrolled in higher education.

OB3 Anticipated Regulatory Changes (OB3 Anticipated Regulatory Changes Effective July 1, 2026)

Additional details will be incorporated once reporting requirements between OB3 and Gainful Employment and Gainful Employment and Financial Value Transparency (GE/FVT) frameworks are finalized. Key provisions are expected to include:

- Establishment of a low earnings outcomes measure, under which a program may lose Direct Loan eligibility if it fails the measure in 2 out of 3 years.
- Elimination of the existing debt-to-earnings (D/E) ratio test.
- Alignment of GE/FVT reporting requirements within a new unified framework.
- New Earnings Premium measure will apply to ALL programs across ALL sectors.
- Creates administrative capability penalty for programs that fail performance measures for more than 2 years consecutively.
- Undergraduate programs: Compares the median earnings of completers 4 years after program completion with the earnings of “working adults” with only a high school degree or GED who are not enrolled in higher education.

Graduate programs: Compares the median earnings 4 years post-enrollment with the earnings of “working adults” with only a bachelor’s degree who are not enrolled in higher education.

Warnings to students must be provided if a program fails the "low earnings outcomes" measure.

- Resource:
  - FVT and GE Employment Information
  - NSLDS FVT and GE User Guide Dec 2024 Update
  - GE-24-05 – Preparing for NSLDS FVT/GE Reporting – SAIG Enrollment, Online Access

FWS Earnings
- The JP is responsible for generating the query in ctcLink to capture required data elements for reporting FWS earnings to COD.
- References:
  - ctcLink Resource: Reporting FWS Calendar Earnings to COD
  - ctcLink Reference Process Guide: Reporting FWS Calendar Year Earnings to COD

Equity in Athletics Disclosure Act (EADA)
- The JP is responsible for completing the report.
- The JP is responsible for sending the report to students annually and posting it on JP Consumer Information webpage.

Audits
- Refer to the Audit Standards (Quality Assurance) Policy and Procedures Manual

State Reports
- The JP is responsible for generating queries and reports in ctcLink to capture the necessary data for state reporting and submission to the WSAC Portal.

- References:
  - ctcLink Reference Process Guide: WCG Interim Reporting
  - ctcLink Reference Process Guide: Unit Record Report

4.7.2 Reconciliation

Policy

Except for funds received by JP for administrative expenses and for funds used for the Job Location and Development (JLD) Program, funds received by JP under the Federal Student Aid (FSA) programs are held in trust for the intended student beneficiaries. As a trustee of those funds, JP outlines procedures to ensure FSA funds are used as intended.

According to "The Importance of Title IV Reconciliation" in Volume 4, Chapter 5 of the FSA Handbook: "At a minimum, JP reconciles its FSA financial records monthly and may be conducted on a more frequent basis during periods of high transaction volume." JP reviews and compares Title IV aid (grants, loans, and Campus-Based aid) recorded on the U.S. Department of Education's systems (COD, G5, and NSLDS) with the information in JP internal records. Disbursement and cash discrepancies are identified and resolved in a timely manner to ensure JP meets all regulatory requirements. JP documents their reconciliation process and retains any reconciliation documentation for audit and review purposes.

The U.S. Department of Education published an *Electronic Announcement on November 18, 2024 General-24-146*, outlining general reconciliation information for the Direct Loan, Federal Pell Grant and Iraq and Afghanistan Service Grant, and TEACH Grant-Programs.

There are two types of reconciliation:
- *Internal reconciliation* is reconciliation of disbursement transactions (actual disbursements and adjustments) and related cash transactions (drawdowns, drawdown adjustments, refunds of cash, and returns) between the Business Office records and Financial Aid system. If discrepancies are found, JP documents these and resolves them in a timely manner.
- *External reconciliation* is the reconciliation of internal disbursement and cash balances from the Business Office and Financial Aid Office with disbursement and cash balances from the COD system. At a minimum, this reconciliation is completed at least monthly to ensure that data is correct in all systems, and that cash management and disbursement reporting timelines are being met.

Federal Pell Grant Reconciliation:
Pell Grant and Campus-Based (CB) Programs reconciliation: Volume 4, Chapter 5
- Reconciliation for the Federal Pell Grant Program is defined in the *February 7, 2017 Electronic Announcement, Federal Pell Grant Program Reconciliation*, as follows: “Pell Grant Reconciliation is the process by which a school reviews and compares Pell Grant data recorded on the Department of Education’s systems with the information in the school’s internal records.” This process is performed on a regular monthly basis. In addition to regular monthly reconciliation, a final reconciliation is performed as soon as possible after final scheduled disbursements have been made for the award year. This final reconciliation ensures that all data is correct, and that Total Net Drawdowns equal Net Accepted and Posted Disbursements in the COD system (Cash > NAPD balances should equal $0.00).

Direct Loan Reconciliation:
34 CFR 685.300(b)(5) Direct Loan monthly reconciliation required
34 CFR 668.166 Excess cash
Electronic Announcement dated Nov 15, 2022: Title IV Aid Disbursement Reporting, Excess Cash, and Reconciliation Requirements
Electronic Announcement Dated Dec 21, 2021: William D. Ford Federal Direct Loan Program Reconciliation
DL reconciliation: Volume 4, Chapter 6

- JP is required to reconcile cash (funds it received from the G5 system to pay its students) with disbursements (actual disbursement records) it submits to the

COD system monthly. JP is also required to complete a year-end closeout or final reconciliation of its Direct Loan (DL) accounts, including documentation of discrepancies. This is done as soon as possible after the end of JP latest award period (loan period) end date, but no later than the program year closeout date.

- All cash management, disbursement reporting, and monthly reconciliation regulatory requirements supersede the closeout deadline; therefore, JP is able to reconcile to a zero-ending cash balance and confirm closeout soon after its final disbursements. The Direct Loan Program year closeout date is the last processing day of July in the year following the award year, which for 2026-2027 is July 31, 2027.

Campus-Based Programs Reconciliation:
Perkins 34 CFR 674.19(d)(1)
FWS 34 CFR 675.19(b)(2)(iv)
FSEOG 34 CFR 676.19(b)(2)

- JP is required to reconcile its Campus-Based (CB) programs and financial records on a monthly basis against the funds drawn down through G5 to JP designated bank accounts, accounting for any discrepancies. The data from the monthly reconciliation of CB programs is used when JP completes the FISAP.

Procedure
The reconciliation process is a team effort by the Financial Aid Office and JP. Reconciliation is performed monthly for Pell Grant, Direct Loan, and Campus-Based programs utilizing ctcLink. This process involves comparing authorized payments with disbursed funds and promptly addressing any discrepancies.

The JP is responsible for the reporting and reconciliation of financial aid funds utilizing information sent to, and reports received from, the COD system against the disbursement records from ctcLink, while the JP is responsible for the G5 and student accounts data.

- Download the Pell Grant and Direct Loan Reconciliation Reports from the COD system and import into ctcLink.
- Download the Pell Grant and Direct Loan School Account Statement (SAS) from the COD system and import it into ctcLink.
- Generate queries/reports in ctcLink and compare student data between PeopleSoft and COD.
- Identify any discrepancies and take necessary corrective actions to ensure that they will not recur in the following month.
- Resubmit corrected disbursement records to COD or correct earlier transactions on the G5 system.

Close-out reporting: In addition to the monthly reconciliation, JP performs Year-end closeout as the final reconciliation of JP information in the COD system.

- Pell Grant

  - Download the Pell Grant Year-to-Date (YTD) record, which includes the award information in COD.
  - Import the YTD record into ctcLink.
  - Review the data from COD against ctcLink for any discrepancies and take appropriate action before the closeout deadline, which is published annually in the Federal Register.
- Direct Loan
  - Import and review the Year-To-Date (YTD) School Account Statement.
  - Import and review the Loan Detail File.
  - Review and confirm JP $0 balance through the COD website to be considered officially "closed out".

There are several queries in ctcLink that JP uses to reconcile Campus-Based Programs (FSEOG and FWS).

ctcLink Reference Center:
- ctcLink Reference Process Guide: Pell Processing
- ctcLink Reference Process Guide: Loan Processing
- ctcLink Reference Process Guide: FA Fund Management
- ctcLink Reference Process Guide: Reconcile Financial Aid

4.8 Systems/Resources Used for Reporting & Reconciliation
- ctcLink, https://myaccount.ctclink.us/
- Common Origination & Disbursement (COD) - Log-in Required
- EdExpress - Log-in Required
- G5 - Log-in Required
- National Student Loan Data System (NSLDS) - Log-in Required

Section 5: Fiscal Management

5.1 Overview

The Policies and Procedures outlined in this section apply to all JP offices responsible for offering, disbursing, reconciling, and managing federal, state, and institutional financial aid funds. While JP must comply with specific federal regulations related to Title IV Federal Student Aid (FSA), the underlying fiscal principles, internal controls, and operational processes outlined herein also govern state and institutional financial aid programs unless otherwise specified.

Although some procedures in this section are specific to Title IV federal regulations, the operational structure, including reconciliation, internal controls, fund tracking, and disbursement, applies to all sources of student aid administered by JP. These include, but are not limited to grants and scholarships available through Washington State Student Achievement Council (WSAC), college-offered institutional scholarships, and third-party private aid administered by the institution.

The Financial Aid Office is responsible for overseeing the policies and procedures outlined in this section to ensure that federal aid programs are administered in accordance with 34 CFR Part 668 and other applicable regulations. State and institutional aid follow similar internal fiscal management principles and are governed by applicable state statutes, policy manuals, or institutional policies.

The Fiscal Management Policies and Procedures follow the cash management regulations (34 CFR Subpart K) and are intended to:

- Promote sound cash management of FSA program funds by JP;
- Minimize the costs to the government of making FSA program funds available to students; and
- Minimize the costs to students who receive FSA loans.

Funds received by JP under the Title IV programs (except for funds provided by the U.S. Department of Education Secretary for administrative expenses and funds used for the Job Location and Development Program under 34 CFR part 675, subpart B) are held in trust for the intended beneficiaries. JP, as a trustee of those funds, may not use the funds as collateral or engage in any practice that risks the loss of those funds. Moreover, JP must exercise the level of care and diligence required of a fiduciary in managing Title IV program funds.

To ensure adequate fiscal management practices, JP uses a cash management system that adheres to federal regulations and other standards. Cash management practices are governed by:

- Generally Accepted Accounting Principles (GAAP)
- Standards prescribed by the federal Office of Management and Budget (OMB)
- U.S. Department of the Treasury regulations
- U.S. Department of Education (ED/the Department) regulations.

An effective institutional financial aid program requires a cooperative effort among all JP offices involved in delivering financial aid to students. This cooperation includes separate reporting and recordkeeping responsibilities for each office, as well as shared responsibilities. Reporting and recordkeeping responsibilities related to Title IV funding are outlined in the 2024-2025 Federal Student Aid (FSA) Handbook, Volume 2.

34 CFR 668.16(C) requires that in the administration of Title IV, HEA programs there be adequate checks and balances in its system of internal controls and the institution divides the functions of authorizing payments and disbursing or delivering funds so that no office has responsibility for both functions with respect to any particular student aided under the programs.

For example, the functions of authorizing payments and disbursing or delivering funds must be divided so that for any particular student aided under the programs, the two functions are carried out by at least two organizationally independent individuals who are not members of the same family, or who do not together exercise substantial control over the institution.

The Financial Aid Office is responsible for the authorization of financial aid funds. **Authorization** is the internal process of approving financial aid funds to be applied to a student's account. It occurs after eligibility has been confirmed but before funds are actually released.

Authorization:

- Confirms the student is eligible for the specific aid program and award amount;
- Indicates that the institution has approved the aid to be applied to the student's account;
- Allows funds to be credited to institutional charges such as tuition, fees, and on-campus housing;
- Represents an accounting and approval function, not the release of cash; and
- Reflects that funds are authorized but disbursed.

The JP is responsible for the disbursement of financial aid funds. **Disbursement** is defined as the actual release of financial aid funds to the student's account or directly to the student.

Disbursement:

- Occurs after authorization and when all disbursement conditions are met (e.g., enrollment confirmed, attendance verified);
- Involves the posting of funds to the student's account to pay institutional charges;
- Requires that any remaining balance be refunded to the student within required timelines (e.g., credit balance within 14 days); and
- Is the point at which aid is considered paid.

JP are responsible for most financial accounting and recordkeeping (except for the detailed records and files on individual financial aid recipients that must be kept in the financial aid office).

At JP:

- The JP are responsible for the maintenance and disbursement of financial aid offers to student accounts. Financial Aid offered by the institution, state, federal, or private entities are offered and administered by representatives from the Financial Aid Office;
- The JPis responsible for posting approved financial aid funds to student accounts in cooperation with the Financial Aid Office;
- The JP is responsible for managing the drawdown of Title IV funds from the G5 system and ensuring compliance with the cash management requirements outlined in Subpart K of 34 CFR 668. In addition, the JP performs reconciliation to confirm that Title IV Federal Student Aid disbursed to students aligns with records in both the G5 and the Common Origination and Disbursement (COD) systems; and
- Similar practices are followed for other types financial aid funds to ensure fiscal integrity and consistent disbursement procedures.

5.2 Maintaining and Accounting for Funds

34 CFR 668.163

Policy

JP manages all financial aid funds—including federal, state, and institutional aid—in accordance with applicable laws, internal standards, and prudent fiscal practices.

For Title IV programs, JP complies with 34 CFR 668.133. State and institutional funds follow similar principles and internal standards, even when not governed by federal cash management rules.

JP has a separate federal account to receive and return funds and a separate operating account. JP maintains both a federal bank account and a general operating account. Title IV funds are drawn down from G5 and initially deposited into the federal account. In accordance with federal cash management regulations, these funds must be transferred to JP operating account within three business days of the drawdown. These funds must be transferred into the operating account from the federal account within three days.

Procedure

JP chart of accounts identifies all general ledger and subsidiary ledger accounts relevant to the FSA programs. In addition, JP accounts, journals, and records follow federal cash from the moment the funds are drawn through G5 to when funds are disbursed to students. This includes when cash is:

- Deposited into institutional bank accounts;
- Transferred to the general operating account;

- Posted to general and subsidiary ledgers;
- Disbursed to the individual student account ledgers; and if applicable,
- Refunded directly to students via JP.

<<Insert College Procedures>>

Separate Depository Account

Policy

JP has a fiduciary responsibility to ensure that Title IV Federal Student Aid (FSA) funds are used solely for the benefit of eligible students and are not commingled with other institutional funds. JP fulfills this responsibility by utilizing a dedicated federal bank account for the receipt and management of Title IV funds, separate from its general operating account.

Federal funds are never used for institutional operating expenses, pledged as collateral, or included in any financial arrangement—such as overnight investments, sweeps, or interest-generating accounts—that could risk loss, encumbrance, or misuse of those funds.

This segregation supports compliance with 34 CFR §668.161 and 34 CFR §668.163, and ensures JP maintains clear stewardship over federal program funds in accordance with its fiduciary duty.

JP may not request more funds than it immediately needs to make disbursements to eligible students and parents. Therefore, JP must make the disbursements as soon as administratively feasible but no later than three business days [34 CFR 668.162(b)(3)] following the date JP receives those funds (to avoid excess cash issues).

Procedure

Once Title IV funds are drawn from G5 and deposited into JP federal account, the JP transfers the funds into the general operating account within the required timeframe (see below) and ensures they are used solely for eligible student disbursements.

1. **Drawdown of Funds**
   Title IV funds are drawn from the U.S. Department of Education's G5 system by JP and initially deposited into JP designated federal bank account.
2. **Transfer to Operating Account**
   Within three business days of the drawdown, the JP transfers the funds from the federal account to JP general operating account, where they are used to credit student accounts based on authorized disbursement data provided through ctcLink.
3. **Account Identification**
   The federal account is explicitly identified as containing Title IV funds in internal records and is reported to JP depository institution as a Title IV trust account. JP retains documentation of this notification. As a public institution, JP is exempt from filing a UCC-1 financing statement.

4. **Restrictions and Controls**
   - The federal and operating accounts are configured to prohibit sweep arrangements or other investment mechanisms that would expose Title IV funds to risk or delay.
   - Title IV funds are not used for institutional expenses, collateral, or any other non-student purposes.
   - Accounting records clearly track federal funds from drawdown to disbursement and refund, if applicable.
   - Internal audits periodically review compliance with these controls.
5. **Documentation and Records**
   Copies of the G5 drawdown confirmations, fund transfer records, and notices to the depository institution are retained by the JP.
6. in accordance with federal recordkeeping requirements (34 CFR 668.24).

Interest-bearing Depository Account

Policy

JP maintains Federal Student Aid (FSA) funds in an interest-bearing account to the extent practicable, in accordance with 34 CFR 668.163(c).

Interest or investment earnings of up to $500 per year are retained by JP to offset administrative costs associated with maintaining the account. Any interest earned above this amount is returned no later than 30 days after the end of that award year to the Department of Health and Human Services (HHS) in accordance with federal cash management regulations. 34 CFR 668.163(c)(3)

Procedure

If interest earned on Title IV funds in JP federal account exceeds $500 in a single award year, JP will remit the excess to the U.S. Department of Health and Human Services (HHS) within 30 days after the end of that award year.

The following steps will be followed:

1. **Interest Calculation**
   The JP monitors interest earnings and calculates the total interest earned on the federal account at the close of each award year.
2. **Threshold Determination**
   If interest exceeds $500, the amount above $500 is identified as remittable excess.
3. **Preparation for Remittance**
   JP prepares a remittance that includes:
   - A written explanation indicating that the refund is for excess interest,
   - The awarding agency name: “U.S. Department of Education—Federal Student Aid”, and
   - JP Unique Entity Identifier (UEI) is included in the addendum JP.
   - Method of Remittance
     Excess interest is remitted via JP
     - ACH Direct Deposit

        - FedWire
        - Paper check via USPS only, mailed to:
          HHS Program Support Center
          PO Box 979132
          St. Louis, MO 63197
4. **Documentation and Retention**
   A copy of the remittance and supporting documentation is retained by JP in accordance with federal recordkeeping requirements.

See the electronic announcement of May 19, 2017, for more information.

Accounting and Fiscal Records

34 CFR 668.163(d)

Policy

As part of its fiduciary responsibility, JP maintains accounting and internal control systems that ensure federal, state and institutional aid program funds are tracked, protected, and auditable in accordance with federal and state regulations. Specifically, JP:

- Maintains financial records and internal controls capable of identifying the cash balance for each financial aid program included in institutional depository accounts, as clearly as if each program were maintained in a separate account;
- Identifies and monitors any earnings on Title IV, HEA program funds held in institutional accounts; and
- Maintains all fiscal records related to Title IV funds in compliance with the recordkeeping requirements outlined in 34 CFR 668.24.

Procedure

JP follows the procedure below to ensure the accurate identification, management, and documentation of Title IV, HEA program funds in accordance with 34 CFR 668.24 and guidance from the Federal Student Aid (FSA) Handbook. Similar controls govern state and institutional aid funds.

1. **Cash Balance Identification**
   Title IV, HEA program funds are tracked in JP financial systems using fund codes and ledger structures in ctcLink Financials that distinguish each federal aid program. Internal controls are in place to identify the cash balance of each program as clearly as if each were held in a separate account.
2. **Monitoring of Earnings**
   Interest earned on Title IV funds held in the designated federal account is reviewed at least monthly by JP.
   All interest earnings are identified and tracked separately in ctcLink, and any excess interest is handled in accordance with federal requirements.
3. **System Coordination**
   Authorized disbursement data from financial aid is reconciled with both COD and ctcLink to ensure program-level fund balances are accurate. Cross-system reports

are generated monthly to verify that drawdowns, transfers, and student-level postings remain aligned.

4. **Record Retention**
   All fiscal records, including disbursement rosters, G5 drawdown confirmations, reconciliation reports, and bank documentation, are retained for at least three years from the end of the award year for which the aid was offered, as required by 34 CFR 668.24(e). Records are stored electronically within JP secure document management system or enterprise platforms.
5. **Internal Controls and Audit Reviews**
   Periodic internal audits are conducted, at a minimum on a monthly basis, to confirm that fund balances, interest earnings, and program compliance procedures adhere to federal standards. When discrepancies are identified, they are promptly reported to the JP for resolution through documented corrective action.

5.3 Requesting Funds

Policy
JP requests Title IV funds under the advance payment method. JP submits a request for funds to the U.S. Department of Education that may not exceed the amount of funds JP needs to make immediate disbursements. 34 CFR 668.16(b).

Similar practices are followed for other financial aid fund types to ensure fiscal integrity and consistent fund request procedures.

Procedure
Under the advance payment method, actual disbursement information can be submitted no earlier than seven calendar days prior to the disbursement date.

If the U.S. Department of Education accepts that request, it initiates an electronic funds transfer (EFT) of that amount to the depository account designated by JP.

JP must disburse the funds requested as soon as administratively feasible but no later than three (3) business days after JP receives funds from the U.S. Department of Education. 34 CFR 668.164(a)

5.4 Excess Cash

34 CFR 668.166

Policy
This policy applies to Title IV funds. However, similar practices are followed for other financial aid fund types to ensure fiscal integrity and consistent disbursement procedures.

JP draws down Title IV funds under the advance payment method and is responsible for ensuring timely and accurate disbursement of those funds in accordance with federal cash management regulations.

To comply with this method, JP disburses Title IV funds to eligible students or parents within 3 business days of receiving the funds from the U.S. Department of Education.

The U.S. Department of Education defines excess cash as any amount of Title IV funds, excluding Federal Perkins Loan funds, that JP does not disburse by the end of the third business day after:

- The funds are received from the U.S. Department of Education; or
- Previously disbursed Title IV funds (e.g., from financial aid offer adjustments, recoveries, or cancellations) are deposited or transferred into JP depository account.

JP monitors federal fund balances daily to ensure compliance with the excess cash threshold and to avoid holding unspent Title IV funds beyond the allowed timeframe.

Similar practices are followed for other financial aid fund types to ensure fiscal integrity and consistent excess cash procedures.

Procedure
The following procedure applies only to Title IV funds. However, similar practices are followed for other financial aid fund types to ensure fiscal integrity and consistent disbursement procedures.

JP disburses Title IV funds to the student within three business days following the date JP receives them from the U.S. Department of Education by applying those funds to the student's account.

Sometimes JP cannot disburse funds in the required three business days because of circumstances outside JP control.

If unusual circumstances exist, JP may retain for up to an additional 7 calendar days [34 CFR 668.166(b)] an additional amount of excess cash that does not exceed 1% of the total amount of funds JP drew down in the prior award year. JP must return immediately to the U.S. Department of Education any amount of excess cash over the one percent tolerance and any amount remaining in its account after the additional seven-day tolerance period.

The U.S. Department of Education reviews colleges to determine if they have improperly maintained excess cash balances. If the U.S. Department of Education determines that JP has held excess cash beyond the allowable timeframes, JP must reimburse the U.S. Department of Education for the costs the federal government incurred in providing that excess cash to the institution.

5.5 Administrative Cost Allowance (ACA)

34 CFR 690.10(b) and 34 CFR 673.7

Policy

JP receives an annual Administrative Cost Allowance (ACA) from the U.S. Department of Education to help offset the institutional cost of administering certain Title IV programs. The ACA is calculated by the U. S. Department of Education and made available for drawdown in G5.

JP receives $5.00 per unduplicated Federal Pell Grant recipient each award year. These funds are used to support the administration of the following Title IV programs in which JP participates:

- Federal Pell Grant Program (Pell);
- Federal Work-Study Program (FWS); and
- Federal Supplemental Educational Opportunity Grant Program (FSEOG).

Allowable administrative costs include but are not limited to:

- Personnel and system costs associated with processing aid and maintaining compliance;
- Production and distribution of student consumer information; and
- Other eligible expenses tied to Title IV administration as outlined in federal regulations. (FSA Handbook, Volume 6, Chapter 1)

The ACA is drawn through G5 and recorded in JP financial system by JP. Funds are tracked separately and used exclusively for administrative purposes related to eligible Title IV programs.

Procedure
JP receives Administrative Cost Allowance (ACA) funds to offset the cost of administering the Federal Pell Grant, FWS, and FSEOG programs. For Pell Grant, ACA funds are issued under a separate award number (P063Q##XXXX) in G5 and are drawn by JP.These funds are retained by JP and are not disbursed to students or returned to the U.S. Department of Education.

For the Campus-Based Programs (FWS and FSEOG), ACA is not separately offered but is instead retained from JP existing annual allocations. The amount is based on a federally prescribed formula:

- 5% of the first $2,750,000 in disbursements to students;
- Plus 4% of the next $2,750,000 (between $2.75M and $5.5M);
- Plus 3% of any disbursements exceeding $5.5 million.

JP may draw this allowance from either FWS or FSEOG, whichever program has sufficient funds and disbursements for the award year.

ACA funds are used to support allowable administrative costs, including staffing, compliance, system operations, required consumer disclosures, and professional development. JP may prioritize use of ACA for staff training to ensure up-to-date understanding of federal regulations and best practices.

All ACA calculations, drawdowns, and expenditures are tracked by JP in coordination with the Financial Aid Office and are retained in accordance with 34 CFR 668.24.

5.6 Refund Reserve Standards

Policy

The following policy applies only to Title IV funds. However, similar practices are followed for other financial aid fund types to ensure fiscal integrity and consistent disbursement procedures.

As part of its financial responsibility standards under 34 CFR 668.171, JP must maintain sufficient cash reserves to return unearned Title IV funds when a student withdraws. This is a critical requirement for institutions participating in Title IV programs and ensures that students and federal aid programs are protected in the event of early withdrawal.

JP meets this standard by consistently returning Title IV funds in a timely manner under the Return of Title IV (R2T4) provisions in 34 CFR 668.22.

Procedure

The following procedure applies only to Title IV funds. However, similar practices are followed for other financial aid fund types to ensure fiscal integrity and consistent disbursement procedures.

When a student fully withdraws (A student who stops attending all classes in a payment period or period of enrollment, whether the student officially notifies JP or simply stops participating), JP Financial Aid Office performs a Return of Title IV Funds (R2T4) calculation within federally required timeframes. If a return is required, JP initiates the return of unearned Title IV funds within 45 calendar days from the date JP determined the student withdrew.

Funds are returned to the U.S. Department of Education in the order required by federal regulation, beginning with loans and followed by grants, using the G5 system. JP jointly monitor withdrawal activity and returns to ensure compliance with the timeframes and reconciliation requirements set forth in federal regulations.

By consistently returning Title IV funds on time and maintaining sufficient liquidity to process these returns without delay, JP meets the federal requirement for sufficient cash reserves as outlined in 34 CFR 668.171(b)(3).

5.7 Accounting Systems

Policy

The following policy applies only to Title IV funds. However, similar practices are followed for other financial aid fund types to ensure fiscal integrity and consistent disbursement procedures.

JP maintains accounting systems and financial records that fully comply with Generally Accepted Accounting Principles (GAAP) and the requirements of the Higher Education Act. As a participating institution in Title IV, HEA programs, JP is responsible for accurately tracking the receipt, use, and reconciliation of federal student aid funds.

All Title IV transactions are recorded and reported in a manner that supports transparency, audit readiness, and program integrity.

Procedure
The following procedure applies only to Title IV funds. However, similar practices are followed for other financial aid fund types to ensure fiscal integrity and consistent disbursement procedures.

To meet federal compliance standards under 34 CFR 668.24(b) & 34 CFR 668.163(d) JP has established the following financial systems and controls:

1. **Financial Records and Transaction-Level Detail**
   JP maintains financial records in ctcLink that reflect each transaction associated with Title IV programs, including drawdowns, disbursements, returns, and adjustments.
2. **General Ledger and Subsidiary Accounts**
   Title IV funds are recorded using general ledger control accounts and related subsidiary ledgers that clearly separate federal student aid activity from all other institutional financial activity. Each transaction is tagged with unique identifiers for accurate program-level tracking and reconciliation.
3. **Cash Balance and Interest Identification**
   Internal accounting and control systems allow JP to determine the cash balance of each Title IV program at any point in time, as if the funds were held in separate accounts. Any earnings (e.g., interest) on Title IV funds held in institutional accounts are also identified and tracked in accordance with federal cash management regulations.

All accounting activities related to Title IV programs are reviewed during internal reconciliation cycles and are subject to audit under JP annual financial reporting processes.

5.8 Financial Management Systems

Policy
JP utilizes an Enterprise Resource Planning (ERP) platform, ctcLink (PeopleSoft), to manage the financial and regulatory operations associated with federal, state and institutional student aid programs. This system works in tandem to ensure compliance with federal and state cash management regulations and accurate fund management.

- ctcLink serves as JP's primary system of record for determining student eligibility, packaging aid, authorizing disbursements, and performing Return of Title IV Funds (R2T4) calculations. Disbursement data from ctcLink is used to generate files that feed into Student Accounts and Financials.

- Peoplesoft Student Financials serves as JP's enterprise financial system used to initiate Title IV fund drawdowns from G5, state aid rosters, post disbursements to student accounts, reconcile financial aid fund activity, and track institutional cash balances and liabilities.

Procedure
The system supports the following financial management functions:
- Requesting Title IV funds through G5, managed by JP;
- Authorizing and preparing disbursements in Peoplesoft, based on student eligibility and enrollment data;
- Posting disbursements to student accounts, monitored through Peoplesoft, with disbursement rosters generated from Peoplesoft;
- Tracking fund movement and maintaining audit trails, with general ledger activity and disbursement-level detail documented in Peoplesoft;
- Ensuring program compliance, including Return to Title Funds (R2T4), satisfactory academic progress (SAP), and program-specific award limits, managed within Peoplesoft;
- Producing internal reconciliation reports that compare disbursement and drawdown data among Peoplesoft, the Common Origination and Disbursement (COD) system, and G5; and
- Fulfilling external reporting obligations, including the Fiscal Operations Report and Application to Participate (FISAP), reconciliation with the Common Origination and Disbursement (COD) system and the Interim Report & Unit Record Report with the WSAC Portal.

This system is supported by secure user roles and workflows that ensure timely, accurate, and auditable management of federal student aid funds in compliance with 34 CFR 668.161–668.167 and 34 CFR 668.24 and state and institutional aid funds.

5.9 Record Retention and Examinations
Record Keeping: 34 CFR 668.24

Policy
2024-2025 Federal Student Aid Handbook, Volume 2, School Eligibility and Operations

The Washington Secretary of State's Office governs retention scheduling and disposition of public records. JP must retain all required records for a minimum of six years from the end of the award year. However, the starting point for the six-year period is not the same for all records. For example:
- Federal Family Education Loan Program (FFEL) and Direct Loan reports must be kept for six years after the end of the award year in which they were submitted; and
- Borrower records must be kept for six years from the end of the award year in which the student last attended.

JP may retain records longer than the minimum period required. Moreover, JP may be required to retain records involved in any loan, claim, or expenditure questioned in any Title IV program review, audit, investigation, or other review, for more than six years. If the six-year retention period expires before the issue in question is resolved, JP must continue to retain all records until resolution is reached.

According to Washington Administrative Code (WAC 131-276-020) "*Public record" includes* any writing containing information relating to the conduct of government or the performance of any governmental or proprietary function prepared, owned, used or retained by any state or local agency regardless of physical form or characteristics.

"*Retention schedules*" identify agency records and establish minimum periods of time for which the records must be retained based on the records' administrative, fiscal, legal, and historical values.

Procedure
JP follows the records retention schedule outlined by the State of Washington, the State Board for Community and Technical Colleges (SBCTC), and the U.S. Department of Education regulations.

Retention periods for college public records may be found in the Community and Technical Colleges Records Retention Schedule and JP internal retention schedules. These schedules are located on-line. For any record series not covered by the General Records Schedules established by the State of Washington, JP follows the State Government General Records Retention Schedule.

The section below is excerpted from 2024-2025 Federal Student Aid (FSA) Handbook, Volume 2, Chapter 7, regarding federal financial aid funds.

- *Program Records*
  A school must establish and maintain, on a current basis, any application for Title IV funds and program records that document:
    - The school's eligibility to participate in the Title IV, HEA programs;
    - The eligibility of the school's educational programs for Title IV, HEA program funds;
    - The school's administration of the Title IV, HEA programs in accordance with all applicable requirements;
    - The school's financial responsibility, information included in any application for Title IV, HEA program funds; and
    - The school's disbursement and delivery of Title IV, HEA program funds.

- *Fiscal Records*
  A college must account for the receipt and expenditure of all Title IV program funds in accordance with generally accepted accounting principles. A school must establish and maintain on a current basis:
    - Financial records that reflect each Title IV program transaction; and

- General ledger control accounts and related subsidiary accounts that identify each Title IV program transaction and separate those transactions from all other school financial activity.

- *Records for Title IV Aid Recipients*
  A school must maintain records for each Title IV recipient that include, but are not limited to:
  - The FAFSA® Submission Summary or Institutional Student Information Record (ISIR) is used to determine a student's eligibility for Title IV program funds;
  - Application data submitted to the U.S. Department of Education, lender, or guaranty agency by the school on behalf of the student or parent;
  - Documentation of each student's or parent borrower's eligibility for Title IV program funds (e.g., records that demonstrate that the student has a high school diploma, GED, or the ability to benefit);
  - Documentation relating to each student's or parent borrower's receipt of Title IV program funds, including but not limited to:
    - The amount of the grant, loan, or FWS offer; its payment period; its loan period, if appropriate; and the calculations used to determine the amount of grant, loan, or FWS offer;
    - The date and amount of each disbursement of grant or loan funds, and the date and amount of each payment of FWS wages;
    - The amount, date, and basis of the school's calculation of any refunds/returns or overpayments due to or on behalf of the student, or the treatment of Title IV program funds when a student withdraws; and
    - The payment of any overpayment or return of Title IV program funds to the U.S. Department of Education.
  - Documentation of and information collected at any initial or exit loan counseling required by applicable program regulations;
  - Reports and forms used by the school in its participation in a Title IV program, and any records needed to verify data that appear in those reports and forms;
  - Documentation supporting the school's calculation of its completion or graduation rates, and transfer-out rates under 34 CFR 668.45.

5.10 Systems/Resources Used for Fiscal Management

- ctcLink, https://myaccount.ctclink.us/
- ctcLink Reference Center
- Common Origination and Disbursement
- G5
- WSAC Portal
- Community and Technical Colleges Records Retention Schedule
- State Government General Records Retention Schedule

Section 6: Financial Aid Programs

6.1 Overview

JP Federal Student Financial Aid (SFA) Programs are authorized by Title IV of the Higher Education Act of 1965, as periodically reauthorized and amended, to provide assistance in the form of grants, low-interest loans, and part-time employment to eligible students. JP Financial Aid Office administers the Title IV SFA Programs listed below in addition to other scholarships and assistance programs from state, institutional, and local sources.

6.2 Federal Financial Aid Programs

Policy

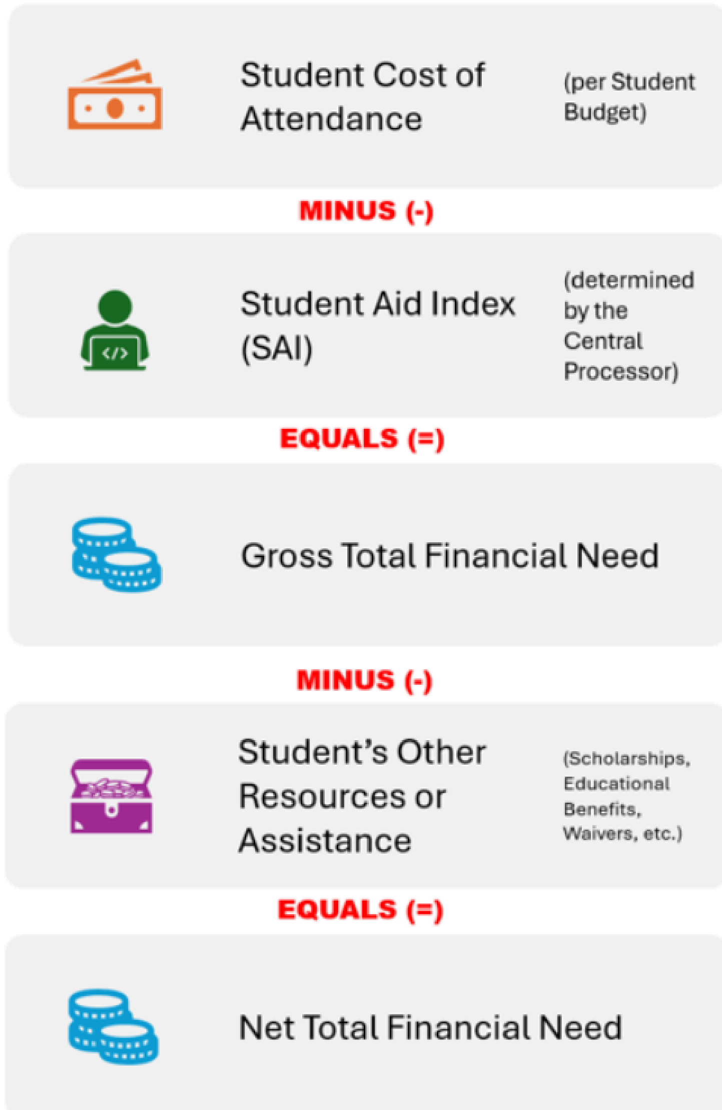
The Program Participation Agreement between JP and the U.S. Department of Education entitles participation in the following federal programs:

- Federal Pell Grant Program
- Federal Supplemental Educational Opportunity Grant Program
- Federal Work-Study Program
- Federal Direct Loan Programs

Procedure

The Free Application for Federal Student Aid (FAFSA®) is used to establish student eligibility for the programs in which JP participates. The financial aid staff will review the Institutional Student Information Record (ISIR) to determine if a student is eligible based upon the application-based requirements. Any additional requirements, including verification, are the responsibility of the Financial Aid Office.

ELEMENTS OF NEED DETERMINATION



6.2.1 Federal Pell Grant

Policy

In general, a student needs to be enrolled in an undergraduate course of study at a non-foreign institution to receive a Pell Grant 34 CFR 668.2. For the Pell Grant program, a student is an undergraduate only if the student has not earned or completed the requirements for a bachelor's or professional degree. A student who has earned a baccalaureate degree or a first professional degree cannot receive a Pell Grant 34 CFR 690.

The student does not need to be full-time to receive Pell Grant funds. Pell Grant award amounts vary depending on the student's Student Aid Index (SAI) from the FAFSA®, Other Financial Assistance (OFA) and the number of eligible credit/unit hours they are enrolled in each term (Pell Enrollment Intensity).

OB3 Anticipated Regulatory Changes (OB3 Anticipated Regulatory Changes Effective July 1, 2026)
The institution administers Workforce Pell Grant funds in accordance with the requirements of the U.S. Department of Education and the Federal Pell Grant Program regulations. Workforce Pell provides eligible students with financial assistance to participate in approved short-term workforce programs that lead to recognized credentials and support employment in high-demand occupations.

The Financial Aid Office is responsible for ensuring that Workforce Pell funds are awarded, calculated, disbursed, and reconciled in compliance with federal regulations, institutional policies, and applicable reporting requirements. Workforce Pell funds are limited to students and programs that meet all Title IV eligibility requirements.

Additional guidance and reporting requirements will be updated as OB3 related regulatory changes and implementation details are finalized.

JP

Procedure
Other Financial Assistance (OFA) is the first source of aid for a student. Once OFA is taken into account, Pell Grant eligibility can be determined.

Financial Aid offers will be adjusted, as needed, on the student's Pell Enrollment Intensity at certain points throughout the term.
- If the student withdraws from a class, the enrollment intensity will be reduced and therefore the total Pell Grant award will be reduced, depending on the date of withdrawal.
- If the student adds eligible classes after original packaging, the enrollment intensity will increase. This will increase the Pell Grant amount until the student reaches twelve credit/unit hours.

Classes have to apply toward the student's program of study, to be calculated as part of the enrollment intensity.

The Pell Grant Recipient Data Exchange has two parts: origination records and disbursement records. The following information is transmitted to the Common Origination and Disbursement Center (COD) at origination:
- Students' names and social security numbers,
- Cost of attendance,
- Enrollment status,
- Verification status,
- SAI, and
- Scheduled payment amounts and dates.

Disbursement records are sent to report the amount to be paid as positive; Decreases after the original disbursement record is sent will be considered adjustments as negative. For Pell Grant awarding purposes, enrollment intensity is based only on credits/units that apply toward the student's program of study or are Pell-eligible.

Pell payment information is transmitted electronically by JP. After transmitting the information, JP receives acceptance, rejection, or adjustments. Normal disbursement processing does not occur until origination and disbursement records have been accepted. Exceptions may be made via manual override due to timing of the data transmission processes (Pell Processing Business Process Guide | 9.2 FA - Financial Aid Business Process Guides | ctcLink Reference Center).

A reconciliation of the Federal Pell Grant must be done monthly. Disbursement records are compared to COD's disbursement records. Discrepancies are identified and resolved.

Financial aid offers are subject to change if any corrections or changes are made to the student's file.

<< Insert College Procedures>>

OB3 Anticipated Regulatory Changes (OB3 Anticipated Regulatory Changes Effective July 1, 2026)

Ineligibility for Federal Pell Grants Due to Receipt of Non-Federal Financial Assistance meeting or exceeding COA.

Workforce Pell Grant Program Eligibility
To qualify, programs must:

- Be offered by an accredited institution eligible for Title IV federal student aid
- Have been offered by the institution for at least one year
- Be 150-599 clock hours (7.5 – 29.5 credit hours)
- Last at least 8 weeks but fewer than 15 weeks
- Lead to a stackable, portable credential recognized by multiple employers or prepare students for entry-level employment that requires one specific credential
- Be approved by the state governor as aligned with in-demand jobs and meeting employers' needs
- Transfer credit into future certificate or degree programs
- Meet performance benchmarks:
    - ≥70% program completion rate within 150% of its expected completion time.
    - ≥70% job placement rate within 180 days of program completion.
    - Program Cost ≤ value-added earnings of graduates 3 years prior.

Student Eligibility Determination

- Review the student's FAFSA® and confirm Title IV eligibility.

- Verify enrollment in an approved Workforce Pell program.
- Confirm the student is meeting Satisfactory Academic Progress (SAP).
- Resolve any conflicting information, verification requirements, or eligibility issues prior to disbursement.

Please note that students who already have a bachelor's degree may still be eligible.

Award Calculation

- Workforce Pell awards will be calculated based on:
  - Student Aid Index (SAI)
  - Cost of Attendance specific to the workforce program
  - Enrollment intensity
  - Program length and defined payment periods
- Students cannot receive both regular Pell and Workforce Pell simultaneously, and time spent using a Workforce Pell Grant counts toward the student's overall Pell eligibility limit.
- Awards will not exceed the student's eligible maximum Pell Grant.

6.2.2 Federal Supplemental Educational Opportunity Grant (FSEOG)

Policy

The Federal Supplemental Educational Opportunity Grant (FSEOG) is available to undergraduate Pell Grant recipients demonstrating exceptional need. Because funding is limited this grant is distributed on a first-come-first-served basis based on the FAFSA® application date to students with a low Student Aid Index (SAI) 34 CFR 676.9, 34 CFR 676.10, 34 CFR 676.16(a) and (e), 34 CFR 676.20.
Priority offering for FSEOG will go to students with a low FAFSA® SAI.

Procedure

After completing the FAFSA® and the financial aid process, qualifying students are offered the FSEOG award based on available funding and by meeting the following requirements:

- Enrolled for a minimum of six eligible credit/unit hours per term,
- Meeting Satisfactory Academic Progress requirements,
- Not be in default on a federal student loan, or
- Owe a grant repayment.

Financial aid offers are subject to change if any corrections or changes are made to the student's file.

Initial awarding is done by awarding more than the term's allocation for access and enrollment management purposes until funds are exhausted based on their date of application during initial packaging.

6.2.3 Federal Work-Study (FWS)

Policy

Federal Work-Study (FWS) is a program funded by the federal government that provides part-time employment to students that display financial need. Eligible students have an opportunity to earn money to help with educational expenses while gaining valuable professional experience in college or community service jobs 34 CFR 675.9, 34 CFR 675.10, 34 CFR 675.19 (b), 34 CFR 675.25(b).

FWS eligibility is determined by the information on the Free Application for Federal Student Aid (FAFSA®). A student needs to meet general eligibility requirements for federal financial aid and the following additional requirements:

- Meets the relevant eligibility requirements.
- Has financial need.
- Is enrolled or accepted for enrollment as an undergraduate student at the college.
- Have not reached the maximum financial aid they can receive for the year.
- Pass a background check with Human Resources (HR).

Note: Students may request to reduce their loans in exchange for FWS

JP

Procedure

JP Financial Aid Office does not provide job placement for students. A work study job is not guaranteed for any student when they receive a FWS offer.

Students who have been offered FWS funding can view available positions on JP website.

- The student and their supervisor partner together to manage the student's time so that they maximize earnings but do not go over allowable hours.
- FWS students are given enough funding to work part-time hours.
- Per federal law, students are not allowed to work during scheduled class hours.
- Students may only work during the certified work period, which is through the last day of final exams.
- A student may work an approved work schedule by JP Financial Aid Office during a break between terms, the student must be enrolled in a minimum of six credit/unit hours for the next term and have a remaining FWS offer.[js]

Financial aid offers are subject to change if any corrections or changes are made to the student's file.

<< Insert College Procedures>>

JP Financial Aid Office monitors the FWS expenditures to ensure the student is not paid more than the budgeted hours. To do so, it is recommended to complete monthly reconciliation. In the event the student works more than their budgeted hours, a staff member will review the students' budget to resolve any over-award.

6.2.4 Federal Direct Loans (Direct Loans)

Policy

To be eligible for Federal Direct Loans (Direct Loans), a student needs to be enrolled in at least a half-time basis at a school that participates in the Direct Loan Program, and students and parents must meet the general federal student aid eligibility requirements 34 CFR Part 685.

The U.S. Department of Education's federal student loan program is the William D. Ford Federal Direct Loan (Direct Loan) Program. There are three types of Direct Loans available:

- Subsidized loans
- Unsubsidized loans
- Parent PLUS Loans

Procedure

Subsidized Loans

A subsidized loan is offered based on financial need. If the student is eligible for a subsidized loan, the government pays (subsidizes) the interest on the loan while the student is enrolled at least half-time, for the first six months after they cease to be enrolled at least half-time, and if they qualify to have their payments deferred (Get Temporary Relief: Deferment and Forbearance | Federal Student Aid)

Depending on the student's financial need, the student may borrow money for an amount up to the annual loan borrowing limit for their level of study. There is a lifetime aggregate limit of $23,000 for subsidized loans.

Unsubsidized Loans

An unsubsidized loan is offered based on remaining eligibility up to the cost of attendance. The student is responsible for loan interest from the time the unsubsidized loan is disbursed until the loan is paid in full. The student can choose to pay the interest while in school or allow it to accumulate and be added to the principal amount of the loan. If the student does not pay the interest while in college, the accumulated interest will be capitalized (it increases the outstanding principal amount due on the loan, Federal Interest Rates and Fees | Federal Student Aid.

Depending on the student's overall financial aid package, the student may borrow money for an amount up to the annual loan borrowing limit for their level of study. There is a lifetime aggregate (maximum) limit of $57,500 for an undergraduate student. No more than $23,000 of this amount may be in subsidized loans.

OB3 Anticipated Regulatory Changes (OB3 Anticipated Regulatory Changes Effective July 1, 2026)

A student has a $257,500 lifetime borrowing limit on all federal student loans, excluding Parent PLUS. If a borrower has a Federal Direct Loan made before July 1, 2026, while enrolled in an eligible program, the borrower can continue to borrow under current loan limits for 3 academic years or the remainder of their expected time to credential, whichever is less.

Please note that the $257,500 lifetime borrowing limit includes federal student loan amount that have been repaid, forgiven, or otherwise discharged.

Parent PLUS Loans
Parent PLUS Loans are unsubsidized loans that a parent may apply for to fund their dependent undergraduate student's education. These loans can help pay a student's education expenses by borrowing up to the Cost of Attendance, less the total financial aid already offered to the student.

https://www.studentaid.gov/ Prior to originating a Parent PLUS Loan, JP verifies that the borrower meets the federal definition of an eligible parent (FSA Handbook, Volume 8, chapter 1). An eligible parent is the student's:

- Biological parent,
- Adoptive parent, or
- A stepparent whose information is included on the FAFSA®.

Parent relationships are verified using FAFSA® data and, when necessary, supporting documentation (e.g., legal guardianship papers or adoption records). Borrowers who are not eligible parents are not permitted to borrow under the Parent PLUS Loan program.

The parent borrower must submit a Parent PLUS Loan application through the U.S. Department of Education's designated platform. The parent borrower must complete a credit check as part of the application process. The Financial Aid Office monitors application status and retrieves results electronically. Parent PLUS Loan requests are processed only for students who are otherwise eligible for Title IV aid.

OB3 Anticipated Regulatory Changes (OB3 Anticipated Regulatory Changes Effective July 1, 2026)

All parents (combined) may borrow $20,000 per year per dependent student and a $65,000 aggregate limit per dependent student (without regard to amounts forgiven, repaid, canceled, or discharged). Direct PLUS Loans cannot be made for an amount that exceeds the student's COA, less OFA received. If the student or parent borrower has a Federal Direct Loan made before July 1, 2026, while the dependent student is enrolled in a program of study, the parent can continue to borrow under current loan limits for 3 academic years or the remainder of their dependent student's expected time to credential, whichever is less.

JP provides the necessary data collected from the PLUS application to COD.

The parent(s) may elect to have the funds distributed to the student and indicate this on the Request Form. PLUS Loan disbursements are made to either the parent or student following other SFA disbursement processes after the start of classes and are subject to the same verifications, edits, and controls as other Student Financial Aid (SFA) disbursements.

The Federal Direct Loan Data Exchange has two parts: origination records and disbursement records. The following information is transmitted to the Common Origination and Disbursement Center (COD) at origination:

- Students' names and social security numbers,
- Cost of attendance,
- Enrollment status,
- Verification status,
- SAI, and
- Scheduled payment amounts and dates.

Financial aid offers are subject to change if any corrections or changes are made to the student's file.

OB3 Anticipated Regulatory Changes (OB3 Anticipated Regulatory Changes Effective July 1, 2026)

Institutionally Determined Limits - Lower loan limits must be applied to the entire program and not on a student-by-student basis.

OB3 Anticipated Regulatory Changes (OB3 Anticipated Regulatory Changes Effective July 1, 2026)

Loan Reduction - Requires institutions to adjust annual loan amounts in direct proportion to the percent of full-time status the student is enrolled.

A reconciliation of Federal Direct Loans must be done monthly. Disbursement records are compared to COD's disbursement records. Discrepancies are identified and resolved.

6.3 State Financial Aid Programs

The State of Washington offers a diverse array of financial aid programs designed to support low- and middle-income residents. These initiatives include grants for individuals pursuing education in high-demand fields, as well as targeted assistance for specific populations.

Policy

JP participates in the following Washington State programs: JP

- Washington College Grant (WCG)

- Washington Grant – Apprenticeships (WG-A)
- College Bound Scholarship (CBS)
- State Work Study (SWS)
- Passport to Careers (Passport)
- Washington State Opportunity Scholarship (WSOS)
- Opportunity Grant (OG)
- American Indian Endowed Scholarship (AIES)
- National Guard Postsecondary Grant (NGG)
- Student Emergency Assistance Grant (SEAG)
- WorkFirst
- Basic Food, Employment and Training (BFET)
- Worker Retraining (WRT)
- Supporting Students Experiencing Homelessness (SSEH)
- Early Achievers Grant (EAG)

State aid is offered in accordance with institutional policy, WSAC program manuals, and SBCTC program guidelines. It is available for allocations at the time of packaging. Aid is not guaranteed, and not all eligible students can be funded once funds are exhausted.

Procedure
The following procedures are for each Washington State program in which the college participates:

Washington College Grant (WCG)
To be eligible for the Washington College Grant, students must:
- Be a Washington resident.
- Have a high school diploma, GED, or equivalent.
- Meet the income requirements outlined for the academic year.
- Have not completed a bachelor's degree.
- Not owe a repayment for any state financial aid program.
- Enroll in a financial aid eligible program.
- Not pursue a degree in theology.
- Maintain Satisfactory Academic Progress (SAP)

Washington College Grant is offered in compliance with the manuals provided by Washington Student Achievement Council.

Washington Grant – Apprenticeship (WG-A)
The Washington College Grant for Apprenticeship includes funding for qualified apprenticeships in a variety of programs in Washington.

Eligible apprentices can receive money to cover costs associated with their apprenticeship program.

To be eligible for the Washington College Grant Apprenticeship, students must:
- Work in a participating WG-A program.

- Have a high school diploma or equivalent.
- Be a resident of Washington State.
- Meet requirements related to family income and need.
- Do not have a bachelor's degree or higher.
- Not owe a repayment for any state financial aid program.
- Have quarters of eligibility remaining (QER)
- Maintain Satisfactory Program Progress (SPP)

College Bound Scholarship (CBS)
Students who meet one of the following requirements are automatically enrolled in College Bound Scholarship:

- Students who are in public school and income-eligible for free-and-reduced price lunch in 7th, 8th, or newly income-eligible in 9th grade.
- Students who are in state foster care, or a dependent of the state, between 7th grade and high school graduation.
- Not pursue a degree in theology.

If a student does not meet either of the above requirements, the family can contact the College Bound program (collegebound@wsac.wa.gov) if the student attended a private school or homeschool program in 7th, 8th, or newly income-eligible in 9th grade and meet the income requirements.

College Bound is offered in compliance with the manuals provided by Washington Student Achievement Council.

State Work Study (SWS)
Students will automatically be considered (per WSAC website) for State Work Study after filing a Free Application for Federal Student Aid (FAFSA®) or the Washington Application for State Financial Aid (WASFA).

To be eligible, a student MUST:

- Submit an approved Free Application for Federal Student Aid (FAFSA®), the Washington Application for State Financial Aid (WASFA), the Washington Grant for Apprenticeship (WG-A) for DACA (Deferred Action for Childhood Arrivals) students
- Be a resident of the state of Washington
- Demonstrate financial need
- Enroll at least half-time in an eligible program
- Maintain satisfactory academic progress
- Not owe a repayment or be in default on any state aid program
- Not pursue a theology degree
- Be authorized to work in the United States

State Work Study is offered in compliance with the manuals provided by Washington Student Achievement Council.

Passport to Careers (Passport)
The Passport to Careers program helps former foster youth and unaccompanied homeless youth prepare for and succeed in college, apprenticeships, or pre-apprenticeship programs.

In most cases, students are required to meet state residency requirements to receive financial aid from the state of Washington; however, if a student is unable to establish state residency because they were an unaccompanied homeless youth in another state, or were placed in state foster care under the interstate compact, residency may be determined by the Washington Student Achievement Council (WSAC).

The following criteria must be met to become recipients:
- Meet the state eligibility criteria for former foster youth or unaccompanied homeless youth.
- Enrolled at least half-time at an eligible college or registered for a pre-apprenticeship or apprenticeship program by your 21st birthday.
- Maintain Washington residency.
- Working towards a certificate, an associate degree, or a first bachelor's degree. A bachelor's in theology does not qualify.
- Maintain Satisfactory Academic Progress.

Passport to Careers is offered in compliance with the manuals provided by Washington Student Achievement Council.

Washington State Opportunity Scholarship (WSOS)
To be eligible for the Washington State Opportunity Scholarship, students must:
- Complete the application by the deadline.
- Be a Washington resident.
- Have a high school diploma, GED, or equivalent.
- Does not have a bachelor's degree.
- Enroll in at least three credits/units per quarter.
- Meet the income requirements outlined for the academic year.
- Complete the Free Application for Federal Student Aid (FAFSA®) or the Washington Application for State Financial Aid (WASFA) by the deadline.

Washington State Opportunity Scholarship is offered in accordance with state regulations.

Opportunity Grant (OG)
To be eligible for the Opportunity Grant, students must:
- Complete the Free Application for Federal Student Aid (FAFSA®) or the Washington Application for State Financial Aid (WASFA) (for continued eligibility).
- Be a Washington State resident.
- Have an income at or below 200 percent of the federal poverty level (see the US Department of Health & Human Services Poverty Guidelines).
- Maintain a 2.0 grade point average.

The Opportunity Grant can be offered in accordance with the SBCTC Opportunity Grant Guidelines and JP individual policies regarding the grant.

Students will be offered up to:

- Cost of tuition and fees up to forty-five credits/units (one-year, full-time) or three years from the initial receipt of any type of Opportunity Grant funds, whichever comes first.
- Cost of required books and supplies up to $1,500.

Note: The Opportunity Grant is limited to students enrolled in high demand and high wage programs approved by SBCTC.

American Indian Endowed Scholarship (AIES)

The American Indian Endowed Scholarship (AIES) helps students with financial need who have close social and cultural ties to an American Indian community in Washington State. Financial aid offer. amounts range from around $500 to $2,000. Ten to 15 students are selected each year to receive the offers.

To be eligible for the American Indian Endowed Scholarship, students must:

- Have close social and cultural ties to an American Indian tribe, or an American Indian community, in Washington State.
- Intend to use their education to benefit American Indians in Washington.
- Have demonstrated financial need (as determined by JP financial aid office).
- Meet Washington State residency requirements for state financial aid.
- Be enrolled as a full-time student at an eligible Washington college or university by the fall term of the award year, and for every term in which the student receives the scholarship. Less than full-time enrollment in any term results in forfeiture of the balance of the offer.
- Not pursuing a degree in theology.
- Have received fewer than five years of this scholarship in total.

The American Indian Endowed Scholarship will be offered in accordance with State Regulations.

National Guard Postsecondary Education Grant (NGG)

The National Guard Postsecondary Education Grant assists members and their eligible dependents with funding for undergraduate, graduate, professional, and certificate study programs at approved institutions and programs within Washington State. First-time undergraduate seekers are offered first, and other applicants are reviewed after Priority Consideration Dates to ensure available funding.

To be eligible for the National Guard Postsecondary Education Grant, participants must meet the following requirements:

- Be an active drilling member in good standing of the Washington National Guard.

- Have completed the current year's Free Application for Federal Student Aid (FAFSA®) or the Washington Application for State Financial Aid (WASFA).
- Attend an accredited higher education institution in Washington State, or a Washington institution that provides training under the Montgomery GI Bill®.

Starting Fall 2024, service members can include dependents. Minimum Dependent/Spouse Qualifications:

- Your service member sponsor must be an active drilling member in good standing with the Washington National Guard.
- Have an active DOD (DEERS) ID.
- Have completed the current year's Free Application for Federal Student Aid (FAFSA®) or the Washington Application for State Financial Aid (WASFA).
- Attend an accredited higher education institution in Washington State, or a Washington institution that provides training under the Montgomery GI Bill®.

The National Guard Postsecondary Education Grant will be offered in accordance with State Regulations.

Student Emergency Assistance Grant (SEAG)

The SEAG program allows community and technical colleges to provide monetary assistance to students experiencing unforeseen emergencies or situations that affect the student's ability to remain enrolled in their classes.

Colleges that administer SEAG Program funding to students must ensure that students' access to emergency aid funds will be as low-barrier as possible and will not require the student to fill out the Free Application for Federal Student Aid (FAFSA®) or the Washington Application for State Financial Aid (WASFA) to receive emergency funds.

WorkFirst

WorkFirst is Washington state's welfare reform program that helps people in low-income families find jobs, keep their jobs, find better jobs, and become self-sufficient. WorkFirst helps participants gain skills necessary for better jobs, higher wages, and further advancement.

Basic Food, Employment, and Training (BFET)

The Basic Food, Employment, and Training program (BFET) provides access and services to food stamp recipients in Washington state. Services include job search and job search training, education and skills training, and support services to Basic Food recipients not participating in the state's Temporary Assistance for Needy Families (TANF) program.

Worker Retraining Program (WRT)

The Worker Retraining program can help pay for training expenses at Washington state's community and technical colleges and selected licensed private schools for those who have lost their jobs due to economic changes and for those receiving Unemployment Insurance (UI) benefits.

Supporting Students Experiencing Homelessness (SSEH)
Participating community and technical colleges may implement programs to assist students experiencing homelessness and those who were in foster care at the time of high school completion. Colleges may also establish plans to develop surplus property for affordable housing to accommodate the needs of eligible students.

Early Achievers Grant (EAG)
A student financial aid program to help employed childcare providers and early learning educators complete certificates and associate degrees in early childhood education.

6.4 Institutional Financial Aid Fund

Policy
JP deposits a minimum of three and one-half percent of revenues collected from tuition, services, and activities fees in an institutional financial aid fund to make guaranteed long-term loans and short-term loans to eligible students who demonstrate financial need.

The institutions may use any monies deposited in the institutional financial aid fund for a locally administered financial aid program for high school students enrolled in dual credit programs. Money from this fund may be used for all educational expenses related to a student's participation in a dual credit program, including but not limited to tuition, fees, course materials, and transportation.

Any monies deposited in the institutional financial aid fund that are not used in making long-term or short-term loans may be used by the institution for locally administered financial aid programs for students who demonstrate financial need, such as need-based institutional employment programs or need-based tuition and fee scholarship or grant programs.

For a student to be eligible, they must:

- Register for at least three credit/unit hours.
- Be eligible for resident tuition and fee rates.
- Demonstrate financial need as defined in RCW 28B.92.030.

JP

Procedure
Long-term Loans
Before approving a guaranteed long-term loan, each institution shall analyze the ability of the student to repay the loan based on factors which include, but are not limited to, the student's accumulated total education loan burdens and the employment

opportunities and average starting salary characteristics of the student's chosen fields of study. The amount of the guaranteed long-term loans made under this section shall not exceed the demonstrated financial need of the student.

Priority for any guaranteed long-term loans shall be directed toward students who would not normally have access to educational loans from private financial institutions in Washington state, and maximum use shall be made of secondary markets in the support of loan consolidation.

Short-term Loans

- Can be offered for up to one year in length.
- Can be offered to students who are not in default or delinquent on any student loans.
- Needs proof that the student can repay the loan within the agreed upon timeframe.

For more information regarding these loans, please refer to RCW 28B.15.820.

<< Insert College Procedures>>

6.5 Other Financial Aid Programs

6.5.1 Veterans Benefits

Policy

For Title IV purposes, federal veteran education benefits, as defined under Section 480(c) of the HEA, are not treated as OFA. Veteran education benefits are also not counted as income and therefore are not reported as income on the FAFSA® form.

Noneducational veterans' benefits are also not counted as OFA. Noneducational veterans' benefits include Death Pension and Dependency and Indemnity Compensation (DIC) benefits, and income from the Veterans Affairs Student Work-Study Allowance Program (VASWSAP).

JP

Procedure

Ask the student to identify the specific program under which they are receiving their veteran's education benefits. JP may require a mandatory Veterans Orientation. Students will need to provide their DD-214, Certificate of Eligibility (COE), and any Joint Service Transcript to the School Certifying Official (SCO). There may also be a required form that students need to fill out before every quarter for certification to occur, depending on the institution.

<<Insert College Procedures>>

6.5.2 AmeriCorps

Policy

AmeriCorps benefits are not included as OFA when determining eligibility for Direct Subsidized Loans, but they are counted as OFA when determining eligibility for Direct Unsubsidized Loans.

JP

Procedure

Ask the student to identify the amount which they are receiving their AmeriCorps benefits.

When packaging Campus-Based or TEACH Grant offers, exclude from the OFA any portion of a Direct Subsidized Loan that is equal to or less than the amount of the student's AmeriCorps benefits.

<<Insert College Procedures>>

6.5.3 Vocational Rehabilitation Funds

Policy

Vocational rehabilitation funds are not included as OFA while initially packaging aid for a student. The funds available will be coordinated with the vocational rehabilitation agency and from institutional, state, and federal student financial assistance programs to prevent an overaward. The amount of assistance from the vocational rehabilitation agency must be documented in the student's file.

Procedure

If the student qualifies for both Title IV funds and for vocational rehabilitation assistance funds:

- First, determine the student's aid package without including costs related to the student's disability in the student's COA, and without including anticipated vocational rehabilitation assistance as OFA.

If the vocational rehabilitation agency doesn't fully meet the student's disability costs:

- Include the unmet disability expenses in the student's COA and increase the financial aid offer.

6.6 Systems/Resources Used for Financial Aid Programs

- ctcLink, https://myaccount.ctclink.us/
- ctcLink Reference Center
- Common Origination and Disbursement (COD)
- Title IV Participation Application | Title Iv Program Eligibility
- WSAC Portal – Login
- Washington State Opportunity Scholarship
- FAFSA® Partner Portal

- How To Make Corrections in FAFSA® Partner Portal
- EdExpress - Log-in Required
- EdConnect – Log-in Required

Section 7: Financial Aid Applications & Forms

7.1 Overview

Federal Student Aid regulations require that prospective and continuing students apply for federal Title IV aid using the Free Application for Federal Student Aid (FAFSA®). The U.S. Department of Education provides this application, and it must be processed and submitted at no cost to the student.

Financial aid applications and forms are essential tools that facilitate students' access to financial aid opportunities at JP. JP financial aid application process is designed to be efficient and straightforward, requiring only pertinent information from each applicant to ensure they receive appropriate consideration.

The purpose of this policy is to ensure a standardized, equitable, and transparent process for the submission, review, and management of all financial aid applications and forms, and to outline the responsibilities of the Financial Aid Office in handling applications.

7.2 Application Process

Policy

JP encourages all students to apply for financial assistance. The application process is designed to be simple, and only relevant information is required from each student and contributor (parent or spouse) to receive consideration. The application process may include the FAFSA®, the Washington Application for State Financial Aid (WASFA), the Washington Grant for Apprenticeship (WG-A) and any institutional funding applications the college may have.

Information regarding the financial aid application process is provided to prospective and continuing students through JP website, email, and mailings.

Students must complete the Free Application for Federal Student Aid (FAFSA®) to apply for federal financial aid (other forms may be required for state and /or institutional aid, such as the WASFA and WG-A). The deadline to complete the FAFSA® is June 30 for the applicable award year.

JP

Procedure

Information provided on the FAFSA® determines the specific types of aid that may be received.

- Students may file the FAFSA® beginning October 1st each year (or as soon as it is released by the U.S. Department of Education) and must submit it annually. Students will use income and tax information from the prior-prior year (typically transferred directly from the Internal Revenue Service (IRS) via the FUTURE Act Direct Data Exchange (FA-DDX). For example, for the 2026-2027 FAFSA®, students will reference 2024 income and tax information, and for the 2027-2028 FAFSA®, students will reference income and tax information from 2025.

Usually, within one week of students submitting a completed FAFSA® online (7-10 days from the date mailed for a paper FAFSA®), a FAFSA® Submission Summary (FSS) will be sent by the U.S. Department of Education to the student at the email address provided on the FAFSA®. If no email address is provided, the FSS will be mailed, which typically takes about 4 weeks to arrive. In addition to the student receiving an FSS once the FAFSA® is completed, JP will receive an Institutional Student Information Record (ISIR). This ISIR will be used to determine the student's financial aid offer.

The Financial Aid Office reviews each application received and prepares a financial aid offer letter for all eligible students. The financial aid offer and payment periods are tied to the student's academic schedule. The JP is responsible to:

- Download the FAFSA®/ISIR forms (initial and subsequent transactions) received from the U.S. Department of Education JPbasis and upload the data into the ctcLink system.
- Review the application materials, contact students to request additional information as needed, perform verification, and complete the files.
- Review completed files, package the students using batch or manual processes, and review appeals (pre-award or post-award).

In addition to ctcLink, the FAFSA® Partner Portal (FPP) is used to view and, if applicable, make certain corrections or updates to a student's FAFSA® information.

Note: There will be two active portals that coincide with the two open FAFSA® application cycles. The links below are specific to the application cycle. **Be sure to use the correct portal for the applicable award year.**

- 2025-26 FAFSA® Partner Portal - https://fafsa.partnerportal-2526.ed.gov/#/home
- 2026-27 FAFSA® Partner Portal - https://fafsa.partnerportal-2627.ed.gov/#/home

7.3 Forms

Policy

In addition to the FAFSA®, WASFAA and WG-A, the following forms and documentation may be used in the financial aid process:

- Loan processing forms (Master Promissory Notes for Federal Direct Subsidized and Unsubsidized Loans, Federal Direct PLUS Loans, and Entrance Counseling documentation) provided by the U.S. Department of Education.
- Verification forms and documentation, if applicable (JP developed verification form, wage and tax statements and forms, valid, unexpired, government-issued photo identification (ID), High School completion verification, College transcripts).
- Various Institutional forms or conflicting information documentation.
- Separate documentation that may be submitted due to extenuating circumstances regarding financial need by the student (JP developed

special/unusual circumstance form, supporting documentation provided by the student).
- JP

Each form must be completed in full, legibly, and truthfully.

Procedure
The Financial Aid Office is responsible for overseeing the creation of all forms required by the College, developing internal procedures to ensure the forms are current, available, and distributed, and assigning staff to manage the tracking and follow-up process.

Links to all financial aid forms are available on JP websites and can be viewed and printed. Paper copies of all documents are also available upon request.

7.4 Deadlines

Policy
Since Title IV campus-based funds, Federal Supplemental Educational Opportunity Grant (FSEOG), and Federal Work-Study (FWS) are limited, students are encouraged to apply for the FAFSA® as soon as possible.

FAFSA® application deadlines for each award year are determined by the U.S. Department of Education and are usually the last day in June.

All applications selected for federal verification must be completed within 120 days after the last date of enrollment to be eligible for Pell Grant disbursements, applicants to Campus-Based programs and the Direct Loan program must complete verification by the same deadline or by <<Insert College Deadline>> days after the last date of enrollment to be eligible for those disbursements.

Federal Direct Subsidized and Unsubsidized Loans and Federal PLUS Loans must be certified by the student’s last date of attendance in order to be guaranteed and eligible for disbursement.

Deadlines are strictly enforced unless extenuating circumstances are documented and approved. Late submissions may result in reduced or denied aid.

Procedure
Students are informed of the deadlines on the FAFSA® form for federal and state financial aid. All financial aid applications are reviewed in the order they are received, and financial aid offers are made as soon as eligibility is confirmed.

Students must be accepted for and commence enrollment to receive all financial aid offers. No financial aid offers are made after the end of the award year for periods of prior enrollment.

7.5 Document Assignment, Collection, and Tracking

Policy

All forms requested and received are tracked <<Insert College Procedures>>. There are also notes in the student's paper or an electronic file to track and document the student's application materials.

All financial aid application data is treated as confidential and handled in accordance with the Family Educational Rights and Privacy Act (FERPA) and institutional data privacy policies. Only authorized personnel may access student records.

All financial aid application forms and related documents are retained for a minimum of 6 years after the end of the award year in compliance with federal and state regulations.

Procedure

All applications and forms required for students to apply for and complete their financial aid requests are available on JP website. The forms can be completed and submitted electronically via <<Insert College Procedures>> in a secure environment or printed and submitted in paper format.

JP.

JP

The system is updated JPas the office receives the required documents. The documents are then routed to JP for review and follow-up. Periodic follow-up is done to ensure all applications are progressing in a timely manner through the review process.)

When files are considered complete, the file is reviewed, the student is packaged and offer letters are sent.

7.6 Professional Judgement Review

Policy

Students with unusual circumstances or with changes in the family financial situation that are not apparent on the FAFSA® are encouraged to discuss their situation with JP at any time, either prior to or after receiving a financial aid offer.

If the student's situation warrants further review a [Professional Judgement Review](#) they are encouraged to submit a signed and dated appeal letter and supporting documentation to the Financial Aid Office for consideration. All students who submit such appeals are notified of the approval or denial.

Procedure

Students may request an appeal (a Professional Judgement Review) from the Financial Aid Office in a variety of ways:

- <<Insert College Procedure for example, personal conversation with Financial Aid Office staff member Assistant Director>>; Electronic request with supporting documentation; and/or a personal letter including the details of the appeal, along with supporting documentation.)

JP requires that a FAFSA® be on file before any appeals are reviewed. Appeals received for prior award years or after the last date of attendance will not be considered.

All appeals are reviewed by JP
based on general guidelines established by the Financial Aid Office.

Students are notified of the appeal results within JP days of the appeal date.

For more detailed information on Professional Judgement Review, please see the Professional Judgement Policies & Procedures.

7.7 Systems/Resources Used for Financial Aid Application Forms

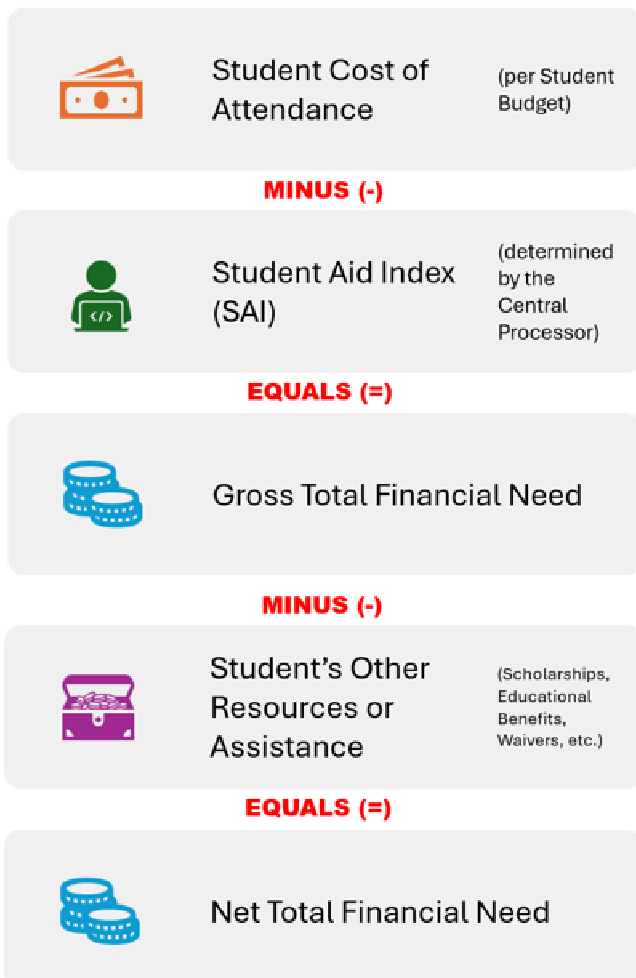
- ctcLink, https://myaccount.ctclink.us/
- ctcLink Reference Center
- 2025-2026 FAFSA® Partner Portal
- 2026-2027 FAFSA® Partner Portal

Section 8: Student Budgets (COA)

8.1 Overview and General Requirements

The U.S. Department of Education directs JP to determine costs and to evaluate the amount of financial aid for which a student may be eligible. Financial Aid Offers, (NASFAA - Financial Aid Offer Examples) for most Title IV programs, are based on financial need.

The cost of attendance (COA) (sometimes called Student Budget) estimates a student's educational expenses for a period of academic enrollment. Financial aid administrators subtract the Student Aid Index (SAI) from the COA to determine eligibility for various need-based financial aid programs. This sets a limit on the total aid that a student may receive for purposes of the Campus-Based, TEACH Grant, and Direct Loan programs, and is one of the basic components of the Pell Grant calculation (NASFAA Monograph – Developing the Cost of Attendance).



8.2 Allowable Costs

34 CFR 668.164(c)(2)

Policy

The types of costs included in the COA are determined by section 472 of the HEA and are the only costs that are included in a student's COA. The items listed below must be included when constructing the student's cost of attendance for students who are enrolled at least half-time. The types of expenses that may be included in the COA are the same for all students, regardless of enrollment status.

- Tuition and fees – an amount normally assessed to a student carrying the same academic workload, as determined by the institution;
- Books, Course Materials, Supplies, and Equipment, including documented rental or purchase of a personal computer (special provisions, 34 CFR 668.164(m));
- Living Expenses – an allowance for food and housing costs, as determined by the institution, to be incurred by the student attending the institution on at least a half-time basis, including:
  - Food costs: A standard allowance reflecting three meals a day, which may be either on- or off-campus.
  - Housing allowances for students living off campus to include rent or other housing costs.
  - Institutionally-owned housing cost allowance is based on the average or the median amount for similar-type residents.
    - Colleges with campus housing: https://www.sbctc.edu/our-colleges/student-life/student-housing
  - For dependent students living at home with parents, a reasonable standard allowance for living costs greater than zero.
- Transportation – an allowance, as determined by the institution, which may include transportation between the campus, residences, and place of work;
- Miscellaneous Personal Expenses – an allowance, as determined by the institution, for a student attending the institution on at least a half-time basis;

Correspondence coursework and distance education have distinct definitions under 34 CFR 600.2 of the Institutional Eligibility regulations, so JP must classify the online coursework populations accordingly. The COA follows these definitions:

- If the courses are classified as distance education courses, JP must include all required COA components under Section 472 of the HEA of 1965 [20 USC 1087LL], as amended, as a regular campus-based residential student since the law states that "no distinction shall be made with respect to the mode of instruction in determining costs."
- If the courses are classified as correspondence study, the COA is limited to tuition and fees and, if required, books, course materials, supplies, and equipment. If the student is fulfilling a required period of residential training, the COA also includes an allowance for travel, food, and housing costs specifically incurred for the period of residential training. 2025-2026 Financial Aid Handbook, Volume 3, Chapter 2

Procedure

Budgets are assigned based on the student's residency, enrollment status, and program of study (major). Currently, off-campus housing is automatically assigned due to system limitations, all 34 colleges operate within a single system instance, which can restrict the ability to implement certain changes or processes at an individual college level. If the student stated a different housing status, JP will make appropriate adjustments to the COA.

Program-related fees and course-related fees are added automatically by JP using a standard cost established by JP for all students in the program or course to the COA based on the student's program of study if the program charges additional fees.

For less-than-half-time students, the food and housing allowance may be included for up to three quarters or the equivalent, with no more than two quarters or the equivalent being consecutive at any one school. Section 472 of HEA, as amended

8.3 How Budgets are Derived and Updated

Policy

JP establishes its budgets (Cost of Attendance) based on average costs for the categories of tuition/fees, books/supplies, transportation, housing/food, and personal/miscellaneous.

Tuition is set by the Washington State Legislature. State Board for Community and Technical Colleges (SBCTC) provides the maximum amount of tuition and fees that JP may charge. However, JP may require additional fees by their respective Board of Trustees and/or student government. SBCTC adopts separate tuition schedules for both upper and lower division courses. Tuition rates for upper division courses are higher than lower division rates. JP must ensure that the COA amounts on their website are current and updated.

Tuition amounts at JP are charged per credit/unit and by residency status and is comprised of three components, as listed below.

- Operating Fee – the operating fee is used locally for college operations: Instruction, Services, Facility Maintenance, etc.
- Building Fee – the building fee is deposited into a statewide Building Fee account and is used to pay and secure the payment of the principal and interest on bonds payable out of the building fees and for the construction, reconstruction, erection, equipping, maintenance, demolition and major alteration of buildings and other capital assets owned by the state board for community and technical colleges.
- Student Activities Fee (S&A Fees) – the student activities fee is allocated by a student committee to pay for programs and services designed to support student success outside the classroom.

In addition to tuition, JP may charge students with additional fees. The following fees may be charged to students:

- Student Services fee

- Technology fee
- Security Enhancement fee
- Class/Course fee
- Distance Education fee
- Digital Material (Electronic textbooks) fee

The basic components used to derive the cost of attendance are:
- Tuition and fees
    - The tuition and fee amounts used in the COA are based on 9-months (three quarters), full-time enrollment (15 quarter units).
        - SBCTC Information on tuition and fees: https://www.sbctc.edu/colleges-staff/programs-services/tuition-fees/
- Books and supplies
- Housing and food
- Transportation
- Miscellaneous personal expenses

JP has various student populations as listed below for which budgets are constructed:
- Students Living With Parents
- Students Living Off-Campus
- Students Living On-Campus
- Resident Students
- Non-Resident (Out-of-State) Students
- Students in a Bachelor's degree program

JP

Procedure
JP reviews the budgets annually and adjusts the COA components based on the annual costs for each category in the COA (except tuition and fees) set by the Washington Financial Aid Association (WFAA).

Tuition and Fee information can be found on JP website at JP. JP Cost of attendance can be found on JP website at JP.

A history of WFAA's annual student budgets is located on the WFAA website. According to the WFAA website, the budgets are based on a nine-month academic year. The WFAA Student Budget Committee sends a survey to all students across the state of Washington. Data from the survey and the Bureau of Labor Statistics (BLS) Consumer Price Index are used to determine budget amounts and to ensure effective standards to support a moderate standard of living. Documentation and methods used to develop the budgets by WFAA are provided to JP for audit purposes.

8.4 Additional Costs
Policy

The following cost components may be added for students upon request when supported by appropriate documentation or if the school has another way of identifying those students and assigning the cost components when constructing the COA, as applicable:

- Dependent Care Costs: This allowance covers actual costs expected to be incurred for dependent care during periods that include, but are not limited to, class time, study time, field work, internships, and commuting time for the student.
- Costs of Obtaining a License, Certification, or First Professional Credential: this allowance must be included for students enrolled in programs that require professional licensure, certification, or a first professional credential in order to practice or participate in the occupation the program is preparing the student to enter.
- Costs for Study Abroad Programs: the allowance includes reasonable costs associated with such study as determined by the home school.
- Disability-Related Expenses: Students with a disability, the allowance for expenses includes costs related to the student's disability, such as special services, personal assistance, transportation, equipment, and supplies that are reasonably incurred and not provided by other agencies.
- Cooperative Education Program Employment Costs: Students engaged in a work experience through a cooperative education program may include this allowance for reasonable costs associated with such employment, as determined by the school.
- Fees for Federal Student Loans: Students receiving Direct Loans must include the fees required to receive the loans. Fees for non-federal student loans may not be included.

Procedure

Students are required to submit an appeal requesting adjustments to the COA for educational-related expenses prior to the start of the fall term. Information on JP Budget Appeals process can be found at JP.

<< Insert College Procedures>>

8.5 Budget Restrictions

Policy

The cost components of the COA must be modified for the following categories of students:

- Enrolled less than half-time;
- Enrolled in correspondence programs; or
- Confined or incarcerated.

The cost of attendance for less-than-half-time students must include only:

- Tuition and fees;
- Books, course materials, supplies, and equipment;

- Transportation;
- Professional licensure, certification, or a first professional credential costs if the academic program leads to a professional licensure, certification, or credential; and
- Dependent care, disability-related expenses, study abroad expenses, and cooperative education costs (if applicable upon request).
- Housing and Food (formerly known as room and board)
    - Optional for less-than-half-time students, the food and housing allowance may be included for up to three quarters or the equivalent, with no more than two quarters or the equivalent being consecutive at any one school. Section 472 of HEA, as amended

The cost components for students engaged in a program of study by correspondence must include only:
- Tuition and fees;
- Books, course materials, supplies, and equipment, if required; and
- Transportation, housing, and food incurred specifically for a period of residential training if the student has such costs.

A correspondence course is one for which the school provides instructional materials and exams for students who do not physically attend classes at the school. This differs from a distance education course, which is offered principally through television, audio, or computer transmission. Interaction between the instructor and student is limited, is not regular and substantive, and is primarily initiated by the student. Distance education courses do not have COA restrictions.

The cost components for confined or incarcerated students must include only:
- Tuition and fees;
- Books, course materials, supplies, and equipment; and
- The cost of obtaining a license, certification, or a first professional credential if enrolled in a program leading to licensure, certification, or credential.

A confined or incarcerated individual is defined as an individual who is serving a criminal sentence in a federal, state, or local penitentiary, prison, jail, reformatory, work farm, juvenile justice facility, or other similar correctional institution. An individual is not considered incarcerated if the individual is subject to or serving an involuntary civil commitment, in a halfway house or home detention, or is sentenced to serve only weekends.

Procedure
JP Financial Aid Office is notified through JP with a report based on student group as designated in ctcLink. Students' financial aid packages are then reviewed by the JP, cost components in the COA are adjusted accordingly, and details of the transactions are noted in the system.

<<Insert College Procedures>>

8.6 Tuition Waivers

Policy

SBCTC regulates the use of waivers and determines which waivers the College must offer to students and which waivers are optional. Each college within SBCTC may also approve optional waivers by its respective Board of Trustees. Additional information about Tuition Waivers is located on the "Tuition Waivers and Residency Classifications" on the SBCTC webpage.

The three main categories of waivers listed below are available to students enrolled at SBCTC colleges. Within these categories, some waivers apply to tuition (operating, building, and S&A), some to dedicated or miscellaneous fees, and some waiver items are used to adjust student fees in select circumstances.

- Required by law
- Required by the State Board
- Those that colleges are allowed, but not required, to offer (optional waivers)

State Board (SB) Policy and Claim Manuals:

- 5.80 Tuition and Fees - https://www.sbctc.edu/colleges-staff/policies-rules/policy-manual/chapter-5
- 5.90 Waiver Policy - https://www.sbctc.edu/colleges-staff/policies-rules/policy-manual/chapter-5
- 50.30.10 Tuition Charges - https://www.sbctc.edu/colleges-staff/programs-services/accounting-business/clam/student-financials/student-financials-processes
- 50.30.60.5 Student Accounts Financial Activity (including Waivers) = https://www.sbctc.edu/colleges-staff/programs-services/accounting-business/clam/student-financials/student-financials-processes

Waiver information can be found on JP website at JP.

Procedure

"*If the school treats a waiver as a payment of tuition and fees that have been charged to a student, then the waiver is considered other financial assistance (OFA), and the full amount of the tuition and fees are included in a student's COA. On the other hand, if the student is never assessed for the full charges, the waiver is not considered to be financial aid, and only the charges actually assessed to the student would be included in the student's COA*." 2025-2026 FSA Handbook, Volume 3, Chapter 2

For students who are granted waivers, their financial aid packages are reviewed and cost components in the COA are adjusted accordingly.

<<Insert College Procedure>>

8.7 Budget Appeals

Policy

JP is required to establish a Title IV COA that is reasonable and consistently applied to serve as the basis and limit on the total financial aid a student may receive. The U.S. Department of Education requires students to be packaged financial aid based on a COA comprised of allowable costs for students carrying similar academic workloads.

JP can adjust a student's COA in certain circumstances as listed below:

- Special circumstances - financial situations (such as loss of income or job) that may justify an aid administrator adjusting data elements in the COA or in the Student Aid Index (SAI) calculation
- Unusual circumstances - conditions that may justify an aid administrator adjusting a student's dependency status based on a unique situation (such as human trafficking, refugee or asylee status, parental abuse or abandonment, incarceration), more commonly referred to as a dependency override

A student may have both a special circumstance and an unusual circumstance. Financial Aid Administrators (FAAs) may make appropriate adjustments to each student's situation with sufficient supporting documentation. Each of the standard components can potentially be increased if the student has excess expenses. These adjustments will be evaluated on a case-by-case basis using professional judgment. (See "Professional Judgment" in Chapter 5 of the Application and Verification Guide).

A professional judgment to consider costs that exceed the standard COA begins with an evaluation of how the student's circumstances have changed since enrolling at JP. If those circumstances are determined by the FAA to be special or unexpected and the request is determined reasonable, students will be required to provide supporting documentation. All supporting documentation will be reviewed for legitimacy.

A Financial Aid Administrator's decision regarding adjustments is final and cannot be appealed.

Students wishing to pursue professional judgement adjustments to their COA should contact JP Financial Aid Office.

Procedure

Students are made aware of COA appeals from various sources such as the Financial Aid Office, referrals from other Student Support Services, faculty, and other departments.

If a student is experiencing education-related expenses greater than the current COA, they may submit an appeal requesting an increase to the cost of attendance along with supporting documentation.

<<Insert College Procedure>>

Appeals are reviewed by the JP.

Results of the appeal are noted in ctcLink including the names of staff, justification of the decision, date appeal was reviewed and date of notification to the student. COA components are then adjusted accordingly for approved appeals and noted in ctcLink.

Students are notified via email or through the message center via the ctcLink Student Homepage of the results of the appeal.

8.8 Systems/Resources Needed for Student Budgets

- ctcLink, https://myaccount.ctclink.us/
- Washington Financial Aid Association
- SBCTC Tuition & Fees
- NASFAA Monograph – Developing the Cost of Attendance

Section 9: Packaging & Awarding (and calculations)

9.1 Overview

Eligibility for financial aid is based on the definition of “an academic year” as prescribed by the U.S. Department of Education.

Students must be degree or certificate seeking and enrolled in an eligible program of study to receive Title IV financial aid.

To receive federal and state financial aid, students must maintain satisfactory academic progress as defined in JP Satisfactory Academic Progress (SAP) Policy.

A student may NOT receive financial aid at two institutions simultaneously. If it is discovered at any time during the academic year that the student is receiving aid at another institution simultaneously, aid may be removed, and the student may owe a balance on their account.

A student’s financial aid is packaged based on the student’s financial need. Financial need is calculated by the cost of attendance (COA) minus the student’s Student Aid Index (SAI) minus Other Financial Assistance (OFA).

- A student’s financial aid offer is subject to change or may be adjusted at any point in the academic year due to a correction(s) by JP, a correction made by the student which changes their SAI and eligibility, a subsequent Institutional Student Information Record (ISIR) transaction, and/or change(s) in federal/state appropriations. JP reserves the right to make corrections to a student’s financial aid information as needed, and these changes may alter a student’s Student Aid Index (SAI), financial aid offer eligibility, and, subsequently, the financial aid package.
- In addition, changes in a student’s SAI due to the student’s/parent’s failure to report accurate information on the FAFSA® may result in financial aid offer revision(s) as well. JP reserves the right to adjust the content and/or the amount of the student’s financial aid package based on the above conditions at any point in the academic year.

9.2 Packaging Philosophy

To be considered ready for packaging, students must:

- Have a valid ISIR on file (Free Application for Federal Student Aid (FAFSA®), the Washington Application for State Financial Aid (WASFA), the Washington Grant for Apprenticeship (WG-A) data),
- Have an admission status of admitted, with a specified program of study that is financial aid eligible,
- Must have submitted all required documentation, and
- Must not owe a repayment of any federal or state financial aid.

JP

A FAFSA® with federal rejects is not valid, and the student is ineligible for packaging until all rejects have been corrected.

The budget status will be set to “Off Campus” unless the student indicates otherwise (a college may leverage the workaround provided by FA Support for anything other than off campus).

Data received through the National Student Loan Data System (NSLDS) will be used to verify financial aid history. Transfer students will be monitored via the NSLDS Transfer Student Monitoring (TSM) process.

All eligible applicants will be sent a financial aid offer via ctcLink, including applicants who will only be receiving Pell Grant or Federal Direct Loan(s).

Packaging Construction Process
Student files are reviewed upon admission to JP and upon receipt of a FAFSA®. Standard budgets are used to package students as per housing status. Students selected for verification are notified regarding additional information needed before packaging can continue.

Students receive a financial aid offer up to the Cost of Attendance.

Resources are packaged in the following order.
1. Outside resources and non-federal grant or scholarship assistance (State, private, institutional)
2. Federal Pell Grant*
3. Federal (FSEOG and Federal Work Study) and state need-based financial aid
4. Federal need-based loan (Subsidized Direct Loan)
5. Other loans (Unsubsidized Direct Loan, Parent PLUS Loan, and Private Education Loan)

*Pell Grant Eligibility Rules:
Does the non-federal grant or total scholarship assistance **alone** equal or exceed COA?
- If yes, the student is not eligible to receive Pell Grant.
- If no, the student is eligible for full amount of Pell Grant based on eligibility criteria.
- If the non-federal grant or scholarship assistance can be reduced to total less than the COA, adjust non-federal grants and scholarships assistance to a total to less than COA and the student is eligible for full amount of Pell Grant based on eligibility criteria.
- If non-federal grant or total scholarship assistance that equals or exceeds COA is identified after Pell Grant is fully disbursed for the award year, no further action is needed.

- If non-federal grant or total scholarship assistance that equals or exceeds COA is identified prior to Pell Grant being fully disbursed for the award year, can it be adjusted to total less than the COA?
    - o If yes, the student is eligible for full amount of Pell Grant based on eligibility criteria.
    - o If no, the student is not eligible to receive Pell Grant.

The Financial Aid Administrator (FAA) verifies completion of required documentation and will package the student in ctcLink. Once packaged, the student receives notification of their financial aid offer (or revised financial aid offer).

9.3 Payment Periods

Policy

The payment period is applicable to all financial aid programs except the Federal and State Work-Study (FWS) Program. Eligible students are packaged for each payment period following registration if they meet all eligibility requirements and have submitted all required/requested documentation.

JP

Procedure

The payment period is the term (summer, fall, winter, and spring).

<<Insert College Procedures>>

9.4 Crossover Periods (Applicable if a college uses/allows)

Policy

Crossover periods occur when payment periods, financial aid offers, or loans overlap between two different award years. For example, a term that starts in May and ends in July is considered a crossover period because a new award year begins on July 1 of each fiscal year. The financial aid team has the discretion to choose which Student Aid Index (SAI) to use for each student. However, if they allocate Federal Work-Study (FWS) funds to a student who is not attending classes, they must use the SAI for the next enrollment period.

Procedure

For Pell Grant purposes, assign a crossover payment period to the award year that best meets the needs of the student and maximizes the student's eligibility over the two award years in which the crossover payment period occurs. The assignment of the Pell Grant offer may be a different award year than the award year used for offering the rest of the student's Title IV aid.

In a crossover payment period, when using Pell Grant funds from a different award year than the award year used to offer other Title IV aid, use the same SAI, COA, and need for all programs except the Pell Grant Program.

- For Pell Grants, use the SAI, COA, and need for the award year from which the student will be paid, and
- Use the amount of Pell Grant funds received in determining remaining need when packaging aid from other Title IV programs.

9.5 Federal Financial Aid Programs

Policy

For some Title IV programs, eligibility is limited to students who have financial need. Students are considered to have financial need if their cost of attendance (COA) exceeds their Student Aid Index (SAI) and Other Financial Assistance (OFA). These "need-based" programs include the:

- Federal Pell Grant,
- Federal Supplemental Educational Opportunity Grant (FSEOG),
- Federal Work-Study (FWS), and
- Direct Subsidized Loan programs.

The total aid that a student receives from need-based programs may not exceed the student's financial need. Other Financial Assistance (OFA) is considered to be the first source of aid for students. Students with full-ride scholarships (receiving grant aid from nonfederal sources that fully cover their Cost of Attendance) will no longer be eligible for Pell Grants.

A student's eligibility for aid from the other need-based programs is determined by subtracting the student's SAI and Other Financial Assistance (OFA) (including the student's Pell Grant) from the COA:

COA – SAI – OFA = remaining need

Note: Other Financial Assistance (OFA) is the amount of financial assistance for a period of enrollment that a student (or parent on behalf of a student) will receive from federal, state, institutional, or other sources, such as scholarships, grants, net earnings from need-based employment, and loans 34 CFR 682.200(b).

For other Title IV programs, eligibility is not based on the student's financial need. These "non-need-based" programs include the:

- Teacher Education Assistance for College and Higher Education (TEACH) Grant,
- Direct Unsubsidized Loan, and
- Direct PLUS Loan programs.

A student's eligibility for non-need-based aid is determined by subtracting OFA (including any need-based aid) from the COA:

COA – OFA = eligibility for non-need-based aid

The priority deadline for financial aid applications is determined annually by the JP with the approval of JP leadership. Financial aid budgets are determined annually by the JP

- Any financial aid recipient who receives funds from other sources must notify the Financial Aid Office of such assistance. A financial aid offer adjustment is necessary when additional assistance results in an overaward.
    - Outside assistance shall replace federal, state, and institutionally offered financial aid in accordance with procedures established by the Financial Aid Office and in compliance with federal and state legislation/regulation.
    - The Financial Aid Office reserves the right to adjust or cancel a financial aid offer at any time because of changes in a student's financial or academic status or reductions in funding levels.

- Any institutional commitment of federal funds is tentative, contingent upon legislative appropriation and actual receipt of funds by JP.
- Direct loans are originated at the time of the financial aid offer but will not be booked and disbursed until a signed Master Promissory Note (MPN) is received and the student completes loan entrance counseling.
- Financial aid offers are made for the academic year, based on the student's eligibility.
- Financial aid offered for a given quarter may be canceled if the student fails to complete all requirements for the financial aid offer.
- A financial aid offer of employment eligibility does not guarantee either employment or earnings. Employment eligibility represents the amount that the student may earn during the award year period.
- The deadline for certifying a loan from the Federal Direct Loan program will be the last day of enrollment for the student in that loan period.
- Program Changes: If a student's aid was disbursed for the term the student is requesting a program change; we are unable to change the program (unless there are documented special circumstances).

Procedure
Student Eligibility Requirements/Action Items:

- Be enrolled in an eligible program and begin attendance in at least one class.
- Have a valid High School Diploma or a recognized equivalent.
- Be a U.S. Citizen, U.S. National, a Citizen of the Freely Associated States, or a lawful U.S. Permanent Resident or other eligible noncitizen.
- Complete a Free Application for Federal Student Aid (FAFSA®)*.
- Not be in Default Status for any previously disbursed Federal Direct, Federal Family Education Loan (FFEL), or Perkins Student Loans at any Institution of Higher Education https://studentaid.gov/manage-loans/default/get-out .
- Not be in Overpayment Status for any previously disbursed Pell, TEACH, Iraq and Afghanistan Service Grants (IASG) or FSEOG Grant at any Institution of Higher Education

https://studentaid.gov/help-center/answers/article/why-would-i-repay-federal-grant.

- Have not exceeded Annual or Aggregate Loan Limits.
- Have not exceeded Annual or Lifetime Pell Grant Limits.
- Meet all Satisfactory Academic Progress Requirements

***Free Application for Federal Student Aid (FAFSA®)**

To be considered for federal student aid, a student must complete a FAFSA® form. The FAFSA® collects financial and other information from agencies, such as the Internal Revenue Service (IRS) and uses it to calculate the Student Aid Index (SAI) and determine a student's eligibility.

The FAFSA® form is the only application students must complete to apply for Title IV aid.

Additional information may be required for other purposes, such as packaging private, state or institutional aid. If additional information is collected to offer alternative funding and it affects Title IV eligibility, the information must be considered when offering Title IV aid.

In some limited circumstances, the student or contributor (spouse, parent, or parent's spouse) may need to manually provide their tax information if it is unavailable through the Financial Aid Direct Data Exchange (FA-DDX).

- **Contributor -** The term 'contributor' refers to anyone who is required to provide information, consent, approval, and a signature on the FAFSA® form. Beginning with the 2024-2025 FAFSA®, each contributor will complete their own section of the form. The FAFSA® form is organized by contributor, each section consisting of a group of questions and instructions pertaining to that contributor.

Upon submission of the FAFSA® application, institutions will typically receive the student's Institutional Student Information Record (ISIR) in about 3 to 5 business days. JP must receive the ISIR record from the federal processor before the student's file is considered complete for packaging financial aid offers.

Additional documentation is required when a student:

- Is selected for Verification
- Needs to resolve any conflicting information, or
- Is pursuing a professional judgment

The documentation will be reviewed to determine the student's eligibility for Title IV aid, and the SAI may be adjusted accordingly.

A FAFSA® with federal rejects is invalid, and the student is ineligible for packaging until all rejects are corrected.

9.5.1 Pell Grant

Policy

A student must be enrolled in an undergraduate course of study in an eligible program to receive a Pell Grant. For the Pell Grant program, a student is an undergraduate only if the student has not earned or completed the requirements for a bachelor's or professional degree.

- A student who has earned a baccalaureate degree or a first professional degree cannot receive a Pell Grant.
- A student who has received an associate degree - or any certificate or diploma below the baccalaureate level - and who enrolls in another undergraduate program continues to be considered an undergraduate student until the student has completed the curriculum requirements for a first bachelor's degree.

OB3 Anticipated Regulatory Changes (OB3 Anticipated Regulatory Changes Effective July 1, 2026)
The institution administers Workforce Pell Grant funds in accordance with the requirements of the U.S. Department of Education and the Federal Pell Grant Program regulations. Workforce Pell provides eligible students with financial assistance to participate in approved short-term workforce programs that lead to recognized credentials and support employment in high-demand occupations.

The Financial Aid Office is responsible for ensuring that Workforce Pell funds are awarded, calculated, disbursed, and reconciled in compliance with federal regulations, institutional policies, and applicable reporting requirements. Workforce Pell funds are limited to students and programs that meet all Title IV eligibility requirements.

Additional guidance and reporting requirements will be updated as OB3 related regulatory changes and implementation details are finalized.

Procedure

When an undergraduate student incorrectly reports on the Free Application for Federal Student Aid (FAFSA®) form that they will be a graduate student or has a bachelor's degree, a correction must be made <<Insert College Procedures>>

- Because the FAFSA® application shows that the student is not an undergraduate, the ISIR will show that the student is ineligible for Pell Grant.
- If the application is not corrected, the institution is unable to offer the student Pell Grant.

<u>Scheduled financial aid offer, award year, and annual financial aid offer</u>

Pell Grant Scheduled Offers are based on:

- Information provided on the FAFSA® form,
- The presence of a valid Student Aid Index (SAI) on the student's FAFSA® Submission Summary (FSS) or ISIR,
- The academic year structure, and

- The Pell Grant cost of attendance (COA) for a full-time student for a full academic year.

- The **Scheduled** Offer is the maximum amount a student can receive during the award year. The student's Scheduled Offer is established by the institution using the student's Pell Grant COA and the information received on the student's ISIR, which will include the student's Pell Grant eligibility and SAI.

The **annual** financial aid offer is the maximum amount a student would receive during a full academic year based on enrollment intensity and COA.

- Note that for a full-time student, the annual financial aid offer will be the same as the Scheduled Offer.
- A part-time student who is enrolled in a term-based program will have an annual financial aid offer that is less than the Scheduled Offer.

Published Maximum and Minimum Pell Grant Award Amounts, HEA Sec. 401(b)(1)(A), HEA Sec. 401(b)(1)(C)
The maximum Pell Grant award amount is determined by the Appropriation Act applicable to that award year. The U.S. Department of Education will announce the maximum Pell Grant award amount for the award year, as required, when the amount is available.

The minimum Pell Grant award amount will be 10% of the maximum Pell Grant award amount for the award year.

Beginning with the 2024–25 award year, a student may qualify for a Pell Grant under one of three sets of eligibility criteria:

- Maximum Pell Grant eligibility (Max Pell)
- Minimum Pell Grant eligibility (Min Pell)
- Calculated Pell Grant eligibility, based on SAI

If the FAFSA® Processing System (FPS) has determined that an ISIR transaction is eligible for a Pell Grant, the "Pell Grant Eligibility Flag" will be set to "Y". Institutions will use additional information on the ISIR to determine whether students qualify for Max Pell, Min Pell, or a Calculated Pell Grant. Actual Pell Grant award amounts are unique to individual students and are based upon and limited by the student's enrollment intensity, SAI, COA, and Lifetime Eligibility Used (LEU).

Calculated Pell Grant (Eligibility Based on SAI and COA)
If the "Pell Grant Eligibility Flag" on the ISIR is set to "Y", and the "Max Pell Indicator" and "Minimum Pell Indicator" are blank, the student is eligible for a calculated Pell Grant.

To determine the amount of a calculated Pell Grant,

- Subtract the student's calculated SAI from the award year's published Max Pell amount.

- Round the result to the nearest $5.
    - o If the result is greater than the award year's published Min Pell amount and less than the student's COA, the student is eligible for a calculated Pell Grant of that resulting amount.

Determining the Cost of Attendance (COA)
The COA used for the Pell Grant Program is always the full-year costs for a full-time student, so it may be necessary to prorate actual or average costs up for students who are attending less than an academic year (or who are part-time in a term-based program) or prorate down for students who are attending for periods longer than an academic year.

Packaging Rules
Other Financial Assistance (OFA) is the first source of aid for a student. Once OFA is taken into account, Pell Grant eligibility can be determined.

OB3 Anticipated Regulatory Changes (OB3 Anticipated Regulatory Changes Effective July 1, 2026)

Ineligibility for Federal Pell Grants Due to Receipt of Non-Federal Financial Assistance meeting or exceeding COA.

OB3 Anticipated Regulatory Changes (OB3 Anticipated Regulatory Changes Effective July 1, 2026)
Workforce Pell Grant Program Eligibility
To qualify, programs must:

- Be offered by an accredited institution eligible for Title IV federal student aid
- Have been offered by the institution for at least one year
- Be 150-599 clock hours (7.5 – 29.5 credit hours)
- Last at least 8 weeks but fewer than 15 weeks
- Lead to a stackable, portable credential recognized by multiple employers or prepare students for entry-level employment that requires one specific credential
- Be approved by the state governor as aligned with in-demand jobs and meeting employers' needs
- Transfer credit into future certificate or degree programs
- Meet performance benchmarks:
    - o ≥70% program completion rate within 150% of its expected completion time.
    - o ≥70% job placement rate within 180 days of program completion.
    - o Program Cost ≤ value-added earnings of graduates 3 years prior.

Student Eligibility Determination

- Review the student's FAFSA® and confirm Title IV eligibility.
- Verify enrollment in an approved Workforce Pell program.
- Confirm the student is meeting Satisfactory Academic Progress (SAP).

- Resolve any conflicting information, verification requirements, or eligibility issues prior to disbursement.

Please note that students who already have a bachelor's degree may still be eligible.

Award Calculation

- Workforce Pell awards will be calculated based on:
  - Student Aid Index (SAI)
  - Cost of Attendance specific to the workforce program
  - Enrollment intensity
  - Program length and defined payment periods
- Students cannot receive both regular Pell and Workforce Pell simultaneously, and time spent using a Workforce Pell Grant counts toward the student's overall Pell eligibility limit.
- Awards will not exceed the student's eligible maximum Pell Grant.

Pell Grant Lifetime Eligibility Used

Before offering a Pell Grant, check the COD common record or COD website to make sure students close to the 600% Pell Grant lifetime limit are not packaged in such a way as to exceed 600% of the LEU.

- The Department will also provide weekly reports in the FSA Partner Connect Account Access Management Center, message class PGLEXXOP, where XX=year, for the institution's Pell Grant eligible students that have a Pell LEU greater than or equal to 450%.

Considering Grants and Subsidized Loans First

The law requires aid administrators to determine whether a student is eligible for aid from certain other Title IV programs that would reduce the need for borrowing. If Other Financial Assistance (OFA) is equal to the cost of attendance for a student, they are ineligible to receive a Federal Pell Grant.

Similarly, the institution must determine an undergraduate student's Pell Grant eligibility before originating a Direct Subsidized or Unsubsidized Loan for that student, and the institution must package Campus-Based funds and Direct Subsidized Loans before Direct Unsubsidized Loans.

In addition, the institution must determine an undergraduate student's maximum Direct Subsidized Loan eligibility before originating a Direct Unsubsidized Loan for the student. Only students with financial need can receive Direct Subsidized Loans, which do not accrue interest while they are enrolled at least half-time, during grace and deferment periods, and in certain repayment situations. Direct Unsubsidized Loans do not require financial need, and interest is generally charged throughout all periods, with limited exceptions like cancer treatment deferment.

For a dependent student, the institution can originate and disburse a parent Direct PLUS Loan without determining the student's Pell Grant and Direct Subsidized Loan eligibility. However, if the student on whose behalf the parent is borrowing receives Pell Grant funds and/or other types of aid for the same period of enrollment, that other aid must be considered when determining the Direct PLUS Loan amount that the parent is eligible to borrow. The amount of a parent Direct PLUS Loan cannot exceed the student's COA minus OFA that the student has received.

Packaging Aid for Certain Dependents of Deceased Servicemembers or Public Safety Officers (Pell Grant Special Rule), HEA Section 401(c)

Beginning with the 2024-2025 award year, the Special Rule in Section 401(c) of the HEA allows certain students whose parents or guardians died while serving on active duty in the U.S. Armed Forces or while serving as public safety officers to receive the maximum Pell Grant award, regardless of their calculated SAI. However, all other Title IV aid for these students must be based on their calculated SAI. See Federal Student Aid (FSA) Handbook, Volume 7, Chapter 1, for the specific eligibility requirements that must be met for a student to receive the maximum Pell Grant amount under the Special Rule, and guidance on identifying eligible students.

Note: The Pell Grant Special Rule replaces the Iraq and Afghanistan Service Grant (IASG) and Children of Fallen Heroes (CFH) provisions that were in effect prior to the 2024-2025 award year.

Pell Grant Formula, Payments, and Enrollment Intensity, 34 CFR 690.63, 34 CFR 690.80(b)

- Use the same formula for all years in a student's program.
- Pell Grants must be spread out in disbursements over the course of a program of study.
  - o A student who doesn't enroll in one of the payment periods of a program won't receive the portion of their financial aid offer for that payment period. If the student's enrollment intensity changes in the next payment period, the annual financial aid offer will change and the disbursement amount for the payment period will be different.
    - ▪ Enrollment intensity is the percentage of full-time enrollment at which a student is enrolled, rounded to the nearest whole percent.

Credit/Unit Hours	Enrollment Intensity Formula	Enrollment Intensity	Enrollment Status Equivalent
12 (or more)	12 ÷ 12 = 1.0	100%	Full-Time
11	11 ÷ 12 = 0.917	92%	Three-Quarter Time
10	10 ÷ 12 = 0.833	83%	Three-Quarter Time
9	9 ÷ 12 = 0.75	75%	Three-Quarter Time
8	8 ÷ 12 = 0.667	67%	Half-Time
7	7 ÷ 12 = 0.583	58%	Half-Time
6	6 ÷ 12 = 0.50	50%	Half-Time
5	5 ÷ 12 = 0.417	42%	Less-than-Half-Time

4	4 ÷ 12 = 0.333	33%	Less-than-Half-Time
3	3 ÷ 12 = 0.25	25%	Less-than-Half-Time
2	2 ÷ 12 = 0.167	17%	Less-than-Half-Time
1	1 ÷ 12 = 0.083	8%	Less-than-Half-Time

Pell Formula 1: Credit/Unit-Hour Programs Using Standard Terms With At Least 30 Weeks of Instructional Time, 34 CFR 690.63(a)(1), 34 CFR 690.63(b)

- The term is the payment period, and
- Divide the student's annual financial aid offer by the number of terms in the program's academic year.
    - Combine modules into a standard term that meets the requirements for Formula 1.
- Use the same formula for a program for all payment periods in an award year.

To determine the payment for a payment period, multiply the student's Scheduled Offer by the lesser of:

Number of credit/unit hours in the payment period ÷ Number of credit/unit hours in the program's academic year

OR

Weeks in the payment period ÷ Weeks in the program's academic year

Recalculation and Pell Grants

Since Pell Grants are always based on the full-time COA, recalculation means that the institution is looking at the student's revised enrollment intensity. The Pell Recalculation Date (PRD) is the point in a payment period when a student's enrollment intensity is locked for purposes of determining their Federal Pell Grant eligibility.

Enrollment intensity directly impacts the student's Pell Grant award amount. JP establishes and consistently applies a PRD to ensure accurate disbursements and compliance with federal regulations.

After the PRD, increases in enrollment typically do not result in additional Pell Grant funds, while reductions in enrollment prior to the PRD require the institution to recalculate the award to prevent overpayments.

9.5.2 Campus-Based Programs

The Federal Supplemental Educational Opportunity Grant Program (FSEOG) Policy

To receive an FSEOG, a student must have financial need and must meet the general eligibility requirements for federal financial aid. Students with the lowest SAIs who will also receive Pell Grants for the award year have primary consideration for an FSEOG. If, after giving FSEOG offers to all its Pell Grant recipients, an institution has FSEOG funds remaining, it can offer those funds to eligible students with the lowest SAIs who will not receive Pell Grants.

Additionally, to receive an FSEOG, the student must be enrolled or accepted for enrollment as an undergraduate student and must not have previously earned a bachelor's or first professional degree. <<Insert Additional College Requirements>> JP makes FSEOG funds reasonably available (to the extent that funds remain) to all eligible students.

Procedure
The following criteria outline the priority order for offering FSEOG funds to eligible students, in accordance with federal regulations 34 CFR 676.10:

First Selection Group:
Students with the lowest SAI will also receive Pell Grants in that award year.

- A student who will receive a Pell Grant in the award year is a student who has demonstrated Pell Grant eligibility for the same award year based upon an SAI that has been calculated for the student or the SAI on the student's FAFSA® Submission Summary (FSS) or ISIR.
- A student who receives a Pell Grant at any time in the award year may be offered an FSEOG for that award year, but the student does not have to receive a Pell Grant in the same payment period as the FSEOG.

Second Selection Group:
If FSEOG funds are available, after offering to all Pell Grant recipients for the award year, students with the lowest SAIs who are not receiving Pell Grants will be offered.

- This group also includes students who are no longer eligible for Pell Grants because they have reached their maximum LEU limit. LEU is covered in the FSA Handbook, Volume 7.

Offered Amounts, 34 CFR 676.20
The maximum and minimum FSEOG is determined by JP
Frequency and Amount of Disbursements, 34 CFR 676.16(a) and (e)

Full Academic Year:

- Divide the total FSEOG offer by the number of payment periods the student will attend.
    - If the student's costs or resources differ between payment periods, offer FSEOG in unequal amounts.

FSEOG and Pell Grant LEU
A student who receives a Pell Grant at any time in the award year may be offered an FSEOG for that award year; the student does not have to receive a Pell Grant in the same payment period as the FSEOG. For example, in the case of a student who receives a Pell Grant only for the fall term due to reaching their lifetime eligibility used (LEU), the student may be offered an FSEOG for both the fall term and subsequent terms. Students who have reached or exceeded 600% of their Pell Grant LEU may still be eligible to receive FSEOG. However, they must be considered in the second selection group (see "Selecting FSEOG recipients" in FSA Handbook, Volume 6).

- Keep documentation of the eligible SAI calculated for the student and confirm Pell Grant eligibility prior to disbursement of the FSEOG. For more details on Pell Grant LEU, see FSA Handbook, Volume 7.

- The Federal Supplemental Educational Opportunity Grant (FSEOG) is offered in the amount set in the control record of the system of record each award year. JP has the option to update the item type budgets.

Initial offering is done by overallocation for access and enrollment management purposes until funds are exhausted during initial packaging. Before the first term of the academic year, renewal recipients who were previously offered but are not attending will have their funds removed, and the remaining funds will be offered to eligible students.

Recalculation and FSEOG
If a change in a student's enrollment status results in a change in the student's COA, the institution will recalculate the student's eligibility based on the revised COA. Once a student's eligibility has been recalculated, Title IV funds in excess of the amount the student is eligible to receive must be returned or re-offered, as applicable.

9.5.3 The Federal Work-Study Program (FWS)

Policy

To be eligible for a Federal Work-Study (FWS) job, a student must meet all general eligibility requirements for federal financial aid, must have financial need, and meet the following additional requirements:

- Demonstrate financial need as determined by standard needs analysis calculations
- Be enrolled in six credit/unit hours or more toward their program for the term
- Have not reached the maximum financial aid the student can receive for the year
  - Note: Students may request to reduce their loans in exchange for Work-Study

The institution must generally use 7% of the sum of its initial and supplemental FWS allocations for an award year to compensate students employed in community service activities, and, in meeting this requirement, must include at least one reading tutoring project or family literacy project that employs one or more FWS students.

A student can be employed in an FWS job during a period of nonattendance, such as a summer term, including a summer term before the student begins attendance in a program for the first time. Such students must be planning to attend the institution during the next period of enrollment and must have financial need for that period—the student's current FWS earnings must be used to cover expenses for the upcoming period and will count as other financial assistance (OFA) in that period. 34 CFR 675.25(b)

Procedure

The institution must make FWS jobs reasonably available, to the extent of available funds, to all eligible students.

Eligible students will receive maximum Work-Study funding. The funding must be earned through part-time employment throughout the award year.

Students will receive a notification from the Financial Aid Office once they have been offered Work-Study funds. Students may view their Work-Study offer under financial aid offers in their ctcLink portal.

JP

Use Net FWS Earnings When Packaging 34 CFR 675.25(a)
The gross amount of the financial aid offer is based on the total number of hours to be worked multiplied by the anticipated wage rate. For financial aid offering and packaging purposes, the institution will use the student's net FWS earnings, which exclude taxes and job-related expenses.

To determine the net amount of a student's FWS earnings that will be available to help pay for the student's costs, the institution can subtract estimated taxes and job-related costs* from the student's gross FWS earnings

* Examples of job-related costs include uniforms, the cost of meals at work, and transportation to and from work. For work during vacation periods, job-related costs can include food and housing as long as the FWS student incurs these costs only because of the FWS employment.

Recalculation and FWS
If a change in a student's enrollment status results in a change in the student's COA, the institution will recalculate the student's eligibility based on the revised COA. Once a student's eligibility has been recalculated, Title IV funds in excess of the amount the student is eligible to receive must be returned or re-offered, as applicable.

9.5.4 Direct Loan

Policy
To be eligible for Direct Loans, a student must be enrolled on at least a half-time basis, and students and parents must meet the general federal student aid eligibility requirements.

Only students who have financial need may receive Direct Subsidized Loans. Financial need is not an eligibility requirement to receive a Direct Unsubsidized Loan.

To be eligible to receive a Direct Subsidized Loan or Direct Unsubsidized Loan, an undergraduate student attending must first have received a determination of their Pell Grant eligibility for the period of enrollment for which the student is requesting a loan.

A student can receive a Direct Subsidized Loan or Direct Unsubsidized Loan for preparatory coursework deemed necessary by the school for enrollment in an eligible program. These preparatory courses must be part of an eligible program; standalone courses not contributing to an eligible program are ineligible for funding 34 CFR 668.32(a)(1)(ii).

A student enrolled at least half-time in preparatory coursework can receive loans for one consecutive 12-month period, starting on the first day of the loan period. If this period spans multiple academic years, the student may qualify for more than one annual loan limit 34 CFR 685.203(a)(6).

As of 07/01/2026, the OB3 limits the amount a student can borrow in a given academic year if they are enrolled part-time. This limit is reduced proportionally based on the student's enrollment status, rounded to the nearest percentage point.

The U.S. Department of Education is developing a reduction schedule required by the OB3. JP must use this schedule when adjusting annual loan limits for non-full-time students.

Direct PLUS Loans are available to the parents of dependent undergraduate students. A parent may receive a Direct PLUS Loan only to pay for the education costs of a dependent undergraduate student who meets the definition of an eligible student.

A parent borrower must meet the same citizenship requirements as a student. Similarly, a parent who is in default on a Title IV loan or who owes an overpayment on a Title IV grant is ineligible for a Direct PLUS Loan unless they have made satisfactory arrangements to repay the loan or grant.

A parent who had a prior Title IV loan discharged for total and permanent disability must meet the same eligibility requirements outlined for a student borrower. A parent is not eligible for a Direct PLUS Loan if the federal government holds a judgment lien on their property or if the parent is incarcerated.

Note, however, that a parent's ineligibility for a Direct PLUS Loan does not affect the student's eligibility for other Title IV aid, assuming that the student is otherwise eligible.

Procedure

JP.

1. It will be at the discretion of JP to determine if the Federal Direct Loans will be automatically packaged, or if a form will be required for offering.
2. Direct PLUS Loans will not be packaged automatically but will be offered upon parent/student request.

Direct Loan Packaging Considerations

- Before origination of a Direct Subsidized Loan or Direct Unsubsidized Loan for an undergraduate student, the student’s eligibility for a Pell Grant must be determined.
- Before a Direct Unsubsidized Loan origination for an undergraduate student, the student’s maximum Direct Subsidized Loan eligibility must be determined.
- Originate a Direct Subsidized Loan only for the amount of the student’s financial need—the student’s COA, minus the student’s SAI and OFA.
- A student may qualify for a combination of both Direct Subsidized Loans and Direct Unsubsidized Loans.
- A student has a $257,500 (OB3 Anticipated Regulatory Changes Effective July 1, 2026) lifetime borrowing limit on all federal student loans, excluding Parent PLUS loans. If a borrower has a Federal Direct Loan made before July 1, 2026, while enrolled in a credentialed program, the borrower can continue to borrow under current loan limits for 3 academic years or the remainder of their expected time to credential, whichever is less.
- The parent of a dependent student can take out a Direct PLUS Loan to pay for the student’s COA (assuming the parent meets program eligibility requirements). All parents (combined) borrow $20,000 per year per dependent student and a $65,000 (OB3 Anticipated Regulatory Changes Effective July 1, 2026) aggregate limit per dependent student (without regard to amounts forgiven, repaid, canceled, or discharged). Direct PLUS Loans cannot be made for an amount that exceeds the student's COA, less OFA received. If the student or parent borrower has a Federal Direct Loan made before July 1, 2026, while the dependent student is enrolled in a program of study, the parent can continue to borrow under current loan limits for 3 academic years or the remainder of their dependent student’s expected time to credential, whichever is less.
- If the student is independent, or if a dependent student’s parent is ineligible for a Direct PLUS Loan, the student is eligible for additional Direct Unsubsidized amounts.
- Direct Unsubsidized Loans and Direct PLUS Loans can be used to replace the SAI, as well as to cover the student’s unmet need.
- Direct Subsidized Loans are available only to undergraduate students.
- Direct PLUS Loans are available to parents of dependent undergraduate students.
- Institutions may not limit Direct Loan borrowing by students or parents on an across-the-board or categorical basis.
- Institutionally Determined Limits (OB3 Anticipated Regulatory Changes Effective July 1, 2026) - Lower loan limits must be applied to the entire program and not on a student-by-student basis.
- Loan Reduction (OB3 Anticipated Regulatory Changes Effective July 1, 2026) - Requires institutions to adjust annual loan amounts in direct proportion to the percent of full-time status the student is enrolled.

<u>Offering a PLUS Loan</u>

If a dependent student for whom a parent is borrowing a Direct PLUS Loan chooses not to apply for a Direct Subsidized or Unsubsidized Loan, the Direct

Subsidized/Unsubsidized Loan amount that the student would have been eligible to receive is not counted as OFA when determining the amount of the Direct PLUS Loan.

Recalculation and Direct Loans
If a student's enrollment status changes after the student has already received one or more Direct Loan disbursements, no recalculation of the previously disbursed Direct Loan amount is required.

Annual and Aggregate Loan Limits

Year	Dependent Students (except students whose parents are unable to obtain PLUS Loans)	Independent Students (and dependent undergraduate students whose parents are unable to obtain PLUS Loans)
First-Year Undergraduate Annual Loan Limit	$5,500—No more than $3,500 of this amount may be in subsidized loans.	$9,500—No more than $3,500 of this amount may be in subsidized loans.
Second-Year Undergraduate Annual Loan Limit	$6,500—No more than $4,500 of this amount may be in subsidized loans.	$10,500—No more than $4,500 of this amount may be in subsidized loans.
Third-Year and Beyond Undergraduate Annual Loan Limit	$7,500—No more than $5,500 of this amount may be in subsidized loans.	$12,500—No more than $5,500 of this amount may be in subsidized loans.
Subsidized and Unsubsidized Aggregate Loan Limit	$31,000—No more than $23,000 of this amount may be in subsidized loans.	$57,500 for undergraduates—No more than $23,000 of this amount may be in subsidized loans.

Note: OB3 Anticipated Regulatory Changes (OB3 Anticipated Regulatory Changes Effective July 1, 2026)
The total loan aggregate limit across all loans, except for PLUS loans, is $57,500. Parent PLUS loans have an annual cap of $20,000 and an aggregate loan limit of $65,000 per student. If the student or parent borrower has a Federal Direct Loan made before July 1, 2026, while the dependent student is enrolled in a program of study, the parent can continue to borrow under current loan limits for 3 academic years or the remainder of their dependent student's expected time to credential, whichever is less.

9.6 State Aid

The State of Washington offers a diverse array of financial aid programs designed to support low- and middle-income residents. These initiatives include grants for individuals pursuing education in high-demand fields, as well as targeted assistance for specific populations.

Policy
JP

JP participates in the following Washington State programs:

- Washington College Grant (WCG)
- Washington Grant – Apprenticeships (WG-A)
- College Bound Scholarship (CBS)
- State Work Study (SWS)
- Passport to Careers (Passport)
- Washington State Opportunity Scholarship (WSOS)
- Opportunity Grant (OG)
- American Indian Endowed Scholarship (AIES)
- National Guard Postsecondary Grant (NGG)
- Student Emergency Assistance Grant (SEAG)
- WorkFirst
- Basic Food, Employment and Training (BFET)
- Worker Retraining (WRT)
- Supporting Students Experiencing Homelessness (SSEH)
- Early Achievers Grant (EAG)

State aid is awarded in accordance with institutional policy and the program guidance established by Washington Student Achievement Council (WSAC) and Washington State Board for Community and Technical Colleges (SBCTC). For some programs, funding is limited to available allocations at the time of packaging; therefore, aid is not guaranteed, and otherwise eligible students may not receive funding once those program funds have been fully expended.

Procedure
Washington College Grant (WCG)
To be eligible for the Washington College Grant students must:
- Be a Washington resident.
- Have a high school diploma, GED, or equivalent.
- Meet the income requirements outlined for the academic year.
- Not have a bachelor's degree completed.
- Not owe a repayment for any state financial aid program.
- Enroll in a financial aid eligible program.
- Not pursue a degree in theology.
- Maintain Satisfactory Academic Progress (SAP)

Washington College Grant is offered in compliance with the manuals provided by Washington Student Achievement Council.

Washington Grant – Apprenticeship (WG-A)
The Washington College Grant for Apprenticeship includes funding for qualified apprenticeships in a variety of programs in Washington.

Eligible apprentices can receive money to cover costs associated with their apprenticeship program.

To be eligible for the Washington College Grant Apprenticeship, students must:

- Work in a participating WG-A program.
- Have a high school diploma or equivalent.
- Be a resident of Washington State.
- Meet requirements related to family income and need.
- Not have a bachelor's degree or higher.
- Not owe a repayment for any state financial aid program.
- Have quarters of eligibility remaining (QER)
- Maintain Satisfactory Program Progress (SPP)

College Bound Scholarship (CBS)
Students who meet one of the following requirements are automatically enrolled in College Bound:
- Students who are in public school and income-eligible for free-and-reduced price lunch in 7th, 8th, or newly income-eligible in 9th grade.
- Students who are in state foster care, or a dependent of the state, between 7th grade and high school graduation.
- Not pursue a degree in theology.

If a student does not meet either of the above requirements, the family can contact the College Bound program if the student attended a private school or homeschool program in 7th, 8th, or newly income-eligible in 9th grade and meet the income requirements.

College Bound is offered in compliance with the manuals provided by the Washington Student Achievement Council.

State Work Study (SWS)
Students will automatically be considered (per WSAC website) for State Work Study after filing a Free Application for Federal Student Aid (FAFSA®) or the Washington Application for State Financial Aid (WASFA).

To be eligible, a student MUST:
- Submit an approved Free Application for Federal Student Aid (FAFSA®) or the Washington Application for State Financial Aid (WASFA) for DACA (Deferred Action for Childhood Arrivals) students
- Be a resident of the state of Washington
- Demonstrate financial need
- Enroll at least half-time in an eligible program
- Maintain satisfactory academic progress
- Not owe a repayment or be in default on any state aid program
- Not pursue a theology degree
- Be authorized to work in the United States

State Work Study is offered in compliance with the manuals provided by the Washington Student Achievement Council.

Passport to Careers (Passport)

The Passport to Careers program helps former foster youth and unaccompanied homeless youth prepare for and succeed in college, apprenticeships, or pre-apprenticeship programs.

In most cases, students are required to meet state residency requirements to receive financial aid from the state of Washington; however, if a student is unable to establish state residency because they were an unaccompanied homeless youth in another state, or were placed in state foster care under the interstate compact, residency may be determined by the Washington Student Achievement Council (WSAC).

The following criteria must be met to become recipients:

- Meet the state eligibility criteria for former foster youth or unaccompanied homeless youth.
- Enrolled at least half-time at an eligible college or registered for a pre-apprenticeship or apprenticeship program by your 21st birthday.
- Maintain Washington residency.
- Working towards a certificate, an associate degree, or a first bachelor's degree. A bachelor's in theology does not qualify.
- Maintain Satisfactory Academic Progress.

Passport to Careers is offered in compliance with the manuals provided by the Washington Student Achievement Council.

Washington State Opportunity Scholarship (WSOS)
To be eligible for the Washington State Opportunity Scholarship, students must:

- Complete the application by the deadline.
- Be a Washington resident.
- Have a high school diploma, General Educational Development (GED), or equivalent.
- Not have a bachelor's degree.
- Enroll in at least 3 credits/units per quarter.
- Meet the income requirements outlined for the academic year.
- Complete the Free Application for Federal Student Aid (FAFSA®) or the Washington Application for State Financial Aid (WASFA) by the deadline.

Washington State Opportunity Scholarship recipients are selected by WSOS and funds are processed by the college in accordance with state regulations.

Opportunity Grant (OG)
To be eligible for the Opportunity Grant, students must:

- Complete the Free Application for Federal Student Aid (FAFSA®) or the Washington Application for State Financial Aid (WASFA) (for continued eligibility).
- Be a Washington State resident.
- Have an income at or below 200 percent of the federal poverty level (see the U.S. Department of Health & Human Services Poverty Guidelines).
- Maintain a 2.0 grade point average.

The Opportunity Grant can be offered in accordance with the SBCTC Opportunity Grant Guidelines and the College's individual policies regarding the grant.

Students will be offered up to:

- Cost of tuition and fees up to 45 credits/units (one-year, full-time) or three years from the initial receipt of any type of Opportunity Grant funds, whichever comes first.
- Cost of required books and supplies up to $1,500.

Note: The Opportunity Grant is limited to students enrolled in high-demand and high-wage programs approved by SBCTC. The SBCTC Opportunity Grant Policy Associate approves the qualifying programs.

American Indian Endowed Scholarship (AIES)
The American Indian Endowed Scholarship (AIES) helps students with financial need who have close social and cultural ties to an American Indian community in Washington State—financial aid offer amounts range from around $500 to $2,000. Ten to 15 students are selected each year to receive the financial aid offers.

To be eligible for the American Indian Endowed Scholarship, students must:

- Have close social and cultural ties to an American Indian tribe, or an American Indian community, in Washington State.
- Intend to use their education to benefit American Indians in Washington.
- Have demonstrated financial need (as determined by the college financial aid office).
- Meet Washington State residency requirements for state financial aid. (https://wsac.wa.gov/student-residency)
- Be enrolled as a full-time student at an eligible Washington college or university by the fall term of the award year, and for every term in which the student receives the scholarship. Less than full-time enrollment in any term results in forfeiture of the balance of the offer.
- Not pursuing a degree in theology.
- Have received fewer than five years of this scholarship in total.

The American Indian Endowed Scholarship will be offered in accordance with State Regulations.

National Guard Postsecondary Education Grant (NGG)
The National Guard Postsecondary Education Grant assists members and their eligible dependents with funding for undergraduate, graduate, professional, and certificate study programs at approved institutions and programs within Washington State. First-time undergraduate seekers are offered first, and other applicants are reviewed after Priority Consideration Dates to ensure available funding.

To be eligible for the National Guard Postsecondary Education Grant, participants must meet the following requirements:

- Be an active drilling member in good standing with the Washington National Guard.
- Have completed the current year's Free Application for Federal Student Aid (FAFSA®) or the Washington Application for State Financial Aid (WASFA).
- Attend an accredited higher education institution in Washington State, or a Washington institution that provides training under the Montgomery GI Bill®.

Starting Fall 2024, service members can include dependents. Minimum Dependent/Spouse Qualifications:

- Your service member sponsor must be an active drilling member in good standing with the Washington National Guard.
- Have an active DOD (DEERS) ID.
- Have completed the current year's Free Application for Federal Student Aid (FAFSA®) or the Washington Application for State Financial Aid (WASFA).
- Attend an accredited higher education institution in Washington State, or a Washington institution that provides training under the Montgomery GI Bill®.

The National Guard Postsecondary Education Grant will be offered in accordance with State Regulations.

Student Emergency Assistance Grant (SEAG)
The SEAG program allows community and technical colleges to provide monetary assistance to students experiencing unforeseen emergencies or situations that affect the student's ability to remain enrolled in their classes.

Colleges that administer SEAG Program funding to students must ensure that students' access to emergency aid funds will be as low-barrier as possible and will not require the student to fill out the Free Application for Federal Student Aid (FAFSA®) to receive emergency funds.

WorkFirst
WorkFirst is Washington state's welfare reform program that helps people in low-income families find jobs, keep their jobs, find better jobs, and become self-sufficient. WorkFirst helps participants gain skills necessary for better jobs, higher wages, and further advancement.

Basic Food, Employment and Training (BFET)
The Basic Food, Employment, and Training program (BFET) provides access and services to food stamp recipients in Washington state. Services include job search and job search training, education and skills training, and support services to Basic Food recipients not participating in the state's Temporary Assistance for Needy Families (TANF) program.

Worker Retraining (WRT)

The Worker Retraining program can help pay for training expenses at Washington state's community and technical colleges and selected licensed private schools for those who have lost their jobs due to economic changes and for those receiving Unemployment Insurance (UI) benefits.

Supporting Students Experiencing Homelessness (SSEH)
Participating in community and technical colleges may implement programs to assist students experiencing homelessness and those who were in foster care at the time of high school completion. Colleges may also establish plans to develop surplus property for affordable housing to accommodate the needs of eligible students.

Early Achievers Grant (EAG)
A student financial aid program to help employed childcare providers and early learning educators complete certificates and associate degrees in early childhood education.

9.7 Institutional Aid

RCW 28B.15.820
Each institution deposits a minimum of three and one-half percent of revenues collected from tuition, services, and activities fees in an institutional financial aid fund to make guaranteed long-term loans and short-term loans to eligible students who demonstrate financial need.

The institutions may use any money deposited in the institutional financial aid fund for a locally administered financial aid program for high school students enrolled in dual credit programs. Money from this fund may be used for all educational expenses related to a student's participation in a dual credit program, including but not limited to tuition, fees, course materials, and transportation.

Any money deposited in the institutional financial aid fund that is not used in making long-term or short-term loans may be used by the institution for locally administered financial aid programs for students who demonstrate financial need, such as need-based institutional employment programs or need-based tuition and fee scholarship or grant programs.

For a student to be eligible, they must:
- Be registered for at least three credit/unit hours.
- Be eligible for resident tuition and fee rates.
- Demonstrate financial need as defined in RCW 28B.92.030.

Long-term Loans
Before approving a guaranteed long-term loan, each institution shall analyze the ability of the student to repay the loan based on factors which include, but are not limited to, the student's accumulated total education loan burdens and the employment opportunities and average starting salary characteristics of the student's chosen fields of study. The amount of the guaranteed long-term loans made under this section shall not exceed the demonstrated financial need of the student.

Priority for any guaranteed long-term loans shall be directed toward students who would not normally have access to educational loans from private financial institutions in Washington state, and maximum use shall be made of secondary markets in the support of loan consolidation.

Short-term Loans

- Can be offered for up to one year in length.
- Can be offered to students who are not in default or delinquent on any student loans.
- Needs proof that the student can repay the loan within the agreed upon timeframe.

9.8 Other Aid

Veterans Benefits

Policy

For Title IV purposes, federal veteran education benefits, as defined under Section 480(c) of the HEA, are not treated as OFA. Veteran education benefits are also not counted as income and therefore are not reported as income on the FAFSA® form.

Noneducational veterans' benefits are also not counted as OFA. Non-educational veterans' benefits include Death Pension and Dependency and Indemnity Compensation (DIC), as well as income from the Veterans Affairs Student Work-Study Allowance Program (VASWSAP).

Procedure

Ask the student to identify the specific program under which they are receiving their veteran’s education benefits. Students will need to provide their DD-214, Certificate of Eligibility (COE), and any Joint Service Transcript to the School Certifying Official (SCO). There may also be a required form that students need to fill out before every quarter for certification to occur, depending on the institution.

AmeriCorps

Policy

AmeriCorps benefits are not included as OFA when determining eligibility for Direct Subsidized Loans, but they are counted as OFA when determining eligibility for Direct Unsubsidized Loans.

Procedure

Ask the student to identify the amount which they are receiving their AmeriCorps benefits.

When packaging Campus-Based or TEACH Grant offers, exclude from the OFA any portion of a Direct Subsidized Loan that is equal to or less than the amount of the student’s AmeriCorps benefits.

Vocational Rehabilitation Funds
Policy
Vocational rehabilitation funds are not included as OFA while initially packaging aid for a student. The funds available will be coordinated with the vocational rehabilitation agency and from institutional, state, and federal student financial assistance programs to prevent an overaward. The amount of assistance from the vocational rehabilitation agency must be documented in the student's file.

Procedure
If the student qualifies for both Title IV funds and for vocational rehabilitation assistance funds,

- First, determine the student's aid package without including costs related to the student's disability in the student's COA, and without including anticipated vocational rehabilitation assistance as OFA.

If the vocational rehabilitation agency doesn't fully meet the student's disability costs,

- Include the unmet disability expenses in the student's COA and increase the financial aid offer.

9.9 Financial Aid Offer Notifications

Policy
All eligible applicants will be sent an offer of financial aid through ctcLink, including applicants who will only be receiving Pell Grant or FDSLP (Federal Direct Student Loan Program).

All students will be notified of changes and updates to their financial aid eligibility through ctcLink.

Procedure
Students who are offered during automated packaging will receive a Notification at that time. Financial aid offer information will be available for the student to view on ctcLink.

Students who have not applied for financial aid using the FAFSA®, but are receiving private, state, and college funding, will also receive notifications through ctcLink.

In most cases, the student receives an annual financial aid offer that includes: their program cost of attendance, a breakdown of the financial aid offered, and financial aid office contact information (phone number, email address, website). Information is included regarding the process for receiving loans and the required paperwork for approval and disbursement.

9.10 Packaging Appeals

Policy
Students may submit documentation to appeal their financial aid offer. The designated staff member reviews appeals.

Procedure
Appeals are reviewed on a case-by-case basis following JP Professional Judgement Policy for special or unusual circumstances. An appeal may or may not change the student's financial aid eligibility. The outcome of the appeal and additional eligibility of financial assistance is communicated to the student by a financial aid offer notification through ctcLink, if applicable.

9.11 Packaging Revisions

Policy
The designated staff member runs queries to detect overawards and overpayments. Overawards and overpayments are reviewed, and necessary adjustments are promptly made.

Procedure
Queries are run frequently from the start of the term through the week after drop/add, and periodically thereafter. Queries are also run at the end of the fiscal year as a final cleanup.

Revisions are made promptly after the query is run (typically on the same day).

The student is sent a financial aid offer notification of any change through ctcLink, if applicable.

9.12 Overawards & Overpayments

Policy
An overaward exists whenever:

- The institution offers aid either to a student who is ineligible for a specific program or to a student who is ineligible for any Federal Student Aid (FSA) program assistance.
- The student's financial aid offer in an individual program exceeds the regulatory maximum (e.g., lifetime limit for Pell Grant, annual or aggregate loan limits, annual limit on Federal Supplementary Educational Opportunity Grant (FSEOG) offers, or a Pell Grant offer based on the wrong enrollment intensity).
- The student's aid package exceeds their need, including when the student's SAI is revised after initial packaging.
- The student receives outside resources after a student has been packaged, and the total of the outside resources and packaged aid exceeds the student's financial need.
- The student's financial aid offer exceeds the cost of attendance (COA); and
- The student is receiving a Pell Grant at multiple institutions for the same period.

Overawards become overpayments when an institution cannot correct the overaward before funds are disbursed to the student.

In general, if the institution is not liable for the overpayment, the student is responsible for paying any overpayment that is $25 or more.

The institution is liable for any amount of a Pell Grant or FSEOG overpayment (including amounts under $25) that occurred because the institution failed to follow the requirements in 34 CFR parts 668, 673, 676, or 690, as applicable.

Procedure
Overawards
If a student is determined to have received an overaward, the following actions must be taken:

1. Review the cost of attendance and the Student Aid Index (SAI) to determine if they accurately reflect the student's reasonable costs and resources.
    a. If there are expenses that have not been considered, such as a higher-than-normal course load, or extenuating circumstances that would warrant adjustment, revise the budget or need analysis, as appropriate, then determine if an overaward still exists. (If a student was ineligible for aid for one of the terms in the award year, those expenses cannot be included in the cost of attendance.)

If no funds have been disbursed, the overaward should be reduced to $0. Review program financial aid offer and revise as follows:

1. Funds will be adjusted in the following order
    a. Loans
    b. Work Study
    c. Federal Grants other than Pell Grant
    d. State need-based grants
    e. Institutionally controlled grants/scholarships
2. Pell Grant should not be reduced
3. Private scholarships should not be reduced

If there is an overaward after a partial receipt of funds:

1. Adjust funds in subsequent terms
    a. Funds will be adjusted in the following order
        i. Loans
        ii. Federal Work Study
        iii. Federal Grants other than Pell Grant
        iv. State need-based grants
        v. Institutionally controlled scholarships
        vi. Pell Grant should not be reduced
        vii. Private scholarships should not be reduced
2. The overaward should be reduced to $0 unless there are insufficient undisbursed funds to be canceled.
3. If there is no aid that can be canceled, unpaid Federal Direct Loan offers must be reduced/canceled.

If there is an overaward after full receipt of funds:

1. If the student has only merit aid, Pell Grant, and/or Federal Loan, document in the file that an overaward occurred after all funds were disbursed. No further action is needed.
2. If the student was paid aid and the overaward is in excess of the $300 tolerance, contact the student regarding the overpayment and provide a statement of amounts due and programs to be repaid.

Overpayments

If an overpayment occurs after a partial receipt of funds

1. For Pell Grant overpayment, reduce subsequent terms
2. For campus-based aid overpayment,
    a. If other resources under control of the institution are involved, adjust subsequent terms.

If an overpayment occurs after all funds have been disbursed, or the amount of the overpayment exceeds any remaining eligible disbursements:

1. If the overpayment is due to student error, contact the student regarding the overpayment and provide a statement of amounts due and programs to be repaid.
2. If it is from an institutional error,
    a. Contact the student regarding the overpayment and provide a statement of amounts due and programs to be repaid.
    b. Restore funds to the appropriate federal accounts; this is accomplished by a memorandum to Business Affairs by the Director of Financial aid.

State Overawards/Overpayments

State funding overawards and overpayments are processed according to state guidelines for each funding source. For more information, visit the Resources for Financial Assistance Administrators website.

9.13 Systems/Resources Used for Packaging & Awarding

- ctcLink, https://myaccount.ctclink.us/
- ctcLink Reference Center
- Common Origination and Disbursement (COD)
- National Student Loan Data System (NSLDS) - Log-in Required
- EdExpress - Log-in Required

Section 10: File Review & Verification

10.1 Overview

Verification is a process mandated by the U.S. Department of Education to ensure the accuracy of the information provided on the Free Application for Federal Student Aid (FAFSA®). Typically, the FAFSA® Processing System (FPS) randomly selects applications for verification. This process can occur at any point in the application or financial aid offer stages. Institutional verification policies and procedures align with the guidelines outlined in the Application and Verification Guide of the Federal Student Aid Handbook.

Students' FAFSA® Submission Summary (FSS) will inform students that institutions have the authority to request additional documentation to complete verification. The institution will see a verification indicator tracking flag set to "Y" and a verification tracking group (V1, V4 or V5) on the Institutional Student Information Report (ISIR) for those students who are selected for verification. The institution verifies 100% of selected student applicants, except for students who fall under the Verification Exclusions found in this document. Additionally, as required by federal guidelines or to resolve conflicting information, institutions may select additional applicants for verification and determine which data elements require further review.

To complete the verification process, students and contributors (if applicable) may need to submit additional information and documents. The verification selection may occur even after funds have been disbursed. Completing this process is essential to avoid potential repayment of any disbursed funds. As per federal regulations, students may be required to repay funds if the verification process leads to changes in their aid eligibility, resulting in an over-award situation.

10.2 Verification Selection and Professional Judgment (PJ)

The verification process must be completed prior to the professional judgment (PJ) to adjust any values used to calculate the Student Aid Index (SAI) for selected students. If verification cannot be completed without the resolution of a professional judgment request (e.g., dependency overrides or income adjustments), the institution may proceed with the professional judgment to facilitate verification. A PJ adjustment does not require verification of an application that has not been selected for verification. 34 CFR 668.53(c)

10.3 Institutional Selection of Verification

Institutions possess the authority to select students for verification, even if the U.S. Department of Education did not initially choose them. The institution reserves the right to verify students who may present conflicting information across various documents, including the FAFSA®, admission applications, and other materials submitted to the institution. Furthermore, if a student provides information through email, phone calls, or text messages that contradicts their FAFSA® data, the institution may also opt to select that student for verification. Some examples include:

- A student states they have a dependent on the FAFSA® but, during a phone call, claims they have no dependents.
- A student indicates they are single on the FAFSA® but later references their spouse in an email.
- There is a discrepancy between the documentation submitted on the admissions application and the data received from the FAFSA®.
- Potential fraud indicators may prompt selection for Verification Tracking Groups V4 or V5 to facilitate identity verification. For more information see the Policies & Procedures on Financial Aid Fraud <<Insert Link to P&P on FA Fraud>>

10.4 Applications and Information to be Verified

Policy

JP will refer to the Federal Register Notice published each year by the Secretary of Education for potential verification items. 34 CFR 668.56

JP will verify the following applicants only for the academic year specified by the U.S. Department of Education unless directed otherwise by federal regulations or guidance:

- Applicants selected by the Secretary of Education via the federally approved edits and who are eligible for Title IV funds.
- Applicants who are not selected by the federally approved edits, if there is incorrect data that may affect the applicant's financial aid offer, as applicable per JP Financial Aid Office review.
- Applicants who are not selected by the federally approved edits, if there is conflicting information that may affect the applicant's financial aid offer, as applicable per JP Financial Aid Office review.

Transfer students previously selected for verification must re-verify their information or, if FAFSA® data has not changed, provide a verification letter from the previous institution with the transaction number of a valid ISIR.

JP selection policy will be applied consistently to all applicants who are not selected or required to be selected by the Secretary of Education.

Federal law requires completion of the FAFSA® and verification before a financial aid offer can be made. The Verification Exclusions part of this document reflects the exceptions to this rule. Students notified that they are selected for verification must respond promptly to any requests for information or documents from the Financial Aid Office. This is important to secure their financial aid before the tuition due date for the term in which they wish to enroll.

JP verifies all FAFSA® applications for students who will receive or have received need-based Title IV aid per the acceptable documentation outlined in 34 CFR 668.57. This includes the Federal Pell Grant, Federal Supplemental Educational Opportunity Grant (FSEOG), Federal Work-Study (FWS), and Direct Subsidized Loan programs. Students who are only eligible to receive non-need-based Title IV assistance, such as Direct Unsubsidized Loans or Parent PLUS Loans, may not be required to complete verification. However, applicants selected for verification under specific tracking groups, such as V4 (identity verification and fraud prevention measures), or those with conflicting information, are required to complete verification regardless of the type of aid they choose to accept. Applicants cannot circumvent verification requirements by opting to accept only non-need-based aid if selected for verification.

JP requires verification to be completed before any need-based Title IV aid is processed or offered. No Title IV aid will be disbursed until the verification process is finalized. This includes the origination of Pell Grants and the disbursement of any Title IV funds. If a student is selected for verification after aid has already been disbursed or a Federal

Work-Study assignment has been made—whether through a subsequent ISIR record or by the institution —no further aid will be disbursed, and Federal Work-Study assignments will be suspended until verification is successfully completed.

10.5 Verification Exclusions

There are times when the Financial Aid Office is not required to verify a student's application. In these cases, all verification exclusion methodology must be documented in the student's file, as required by [34 CFR 668.54(b)].
Note: Any information not included in the exclusion must still be verified in accordance with all other Federal Requirements.

FAFSA® data does not have to be verified in the following scenarios:

<u>Death of the Student</u>
The verification process is not required if an interim disbursement was made and the student passed away before verification was completed. No additional disbursements, except for any earned Federal Work Study, may be originated or disbursed.

<u>Not an Aid Recipient</u>
Verification is not required if the student will not receive Title IV aid for reasons other than failure to complete verification, including being ineligible for aid before withdrawing.

<u>The applicant is eligible to receive an Unsubsidized Loan only</u>
V1 verification is not required because an Unsubsidized Loan is not need-based aid. However, if the student is selected for V4 or V5 verification by the U.S. Department of Education, they must complete all requirements for Identity.

<u>Post Enrollment</u>
Verification requirements are no longer necessary if the Financial Aid Office receives a subsequent ISIR selected for verification after the student's last date of attendance (LDA), with no intention of reenrolling within the award year, and no further disbursements (including late) will be made.

<u>Professional Judgement</u>
Applicants requesting professional judgment who are not selected for verification. If verification is required due to selection, it must generally be completed before professional judgment is applied, except in cases where professional judgment is necessary to resolve verification.

<u>Transfer Students</u>
FSA Handbook, Application and Verification Guide, Chapter 4
If the student completed verification for the current award year at another school before transferring, their FAFSA® data must be the same as it was at the previous school. You must,

- Receive a letter from the previous school stating that it verified the student's application that includes the transaction number of the pertinent valid ISIR, and

- Have access to the ISIR transaction before disbursing any federal financial aid.

Special Circumstances for Parents of a Dependent Student
Unless the Financial Aid Office has reason to believe that FAFSA® data is inaccurate, parent data does not have to be verified in the following cases:

- Both parents are mentally incapacitated.
- Both parents or the custodial parent have died.
- The parents are residing in a country other than the United States and cannot be contacted by email, phone, internet messaging, or mail.
- The parents can't be located because the student does not have and cannot get their contact information.

Special Circumstances for a Student Spouse:
Unless the Financial Aid Office has reason to believe that FAFSA® data is inaccurate, the spouse of an independent student's data does not need to be verified in the following cases:

- The spouse has died.
- The spouse is mentally incapacitated.
- The spouse is residing in a country other than the United States and cannot be contacted by email, phone, internet messaging, or mail.
- The spouse cannot be located because the student does not have and cannot get their contact information.

Procedure
When a student is selected for Federal Title IV Verification (whether by the U.S. Department of Education or the Financial Aid Office), they will be notified via the ctcLink Student Homepage under the "Tasks" tile.

The notification will include an outline of the required, accurate, and authentic documentation that must be submitted immediately to prevent any delay of financial aid that requires verification to be completed.

<<Insert College Procedures>>

To view what is required and submit required documents, students will log in to the ctcLink Student Homepage with their ctcLink ID (username) and password.

Additional documentation may be requested by the Financial Aid Office to complete verification due to the potential of needing more documentation for institutional verification. It is the student's responsibility to check requirements and submit all documentation to the Financial Aid Office in a timely manner.

If a document submitted is incomplete or incorrect (or additional documentation is required), the student will receive a notification explaining the action that needs to be taken.

JP understands that document collection in some circumstances can be more difficult than others (e.g., Identity Theft). Therefore, extensions may be granted on a case-by-case basis.

At the end of the academic year, if the institution has not received the required verification documents, all Title IV aid (Grants, Loans, and Work-Study) will be canceled, and the students will need to explore alternative payment options.

<<Insert College Procedures>>

Note: If the parent(s) refuse to complete the FAFSA®, the student will need to correct their FAFSA® information by selecting “Yes” to the “Are the student’s parents refusing to provide their information on this FAFSA®® form?”

Upon completion, the dependent student will receive a rejected FAFSA® Submission Summary (FSS), and the institution will receive a rejected Institutional Student Information Record (ISIR) without a Student Aid Index (SAI), and comment code 049 will populate.

Once this ISIR is received, the institution may offer and originate a Direct Unsubsidized Loan, provided the student's eligibility database matches and is otherwise eligible for the loan.

The student remains a dependent student, so do not add a “dependency override” flag, because doing so would cause the FAFSA® Processing System (FPS) to treat the student as an independent student.

The parents must then sign a statement indicating that they:

1. Refuse to fill out the FAFSA® on the student's behalf; **or**
2. Do not provide any financial support to the student, indicating the date the support ended, and will not provide any financial support to the student in the future.

If the parents refuse to sign and date a statement to this effect, you must get documentation from a third party.

<u>Identification:</u>
Automated Selection: JP relies on the U.S. Department of Education’s FAFSA® Processing System (FPS) to flag applications for verification. The FPS uses various criteria to select applicants whose data may require further evaluation, such as discrepancies or inconsistencies in the information provided on the Free Application for Federal Student Aid (FAFSA®). The institution will verify 100% of FPS selected students. The institution, at its discretion, may select FAFSA® applications to be verified and choose the data items to verify.

Identifying and Verifying Subsequent or Additional Applications or Data:

JP continuously monitors the integrity of the verification process by reviewing new information or additional data elements as they become available. If an application or specific data element warrants further investigation after the initial verification, the institution reserves the right to request additional documentation and conduct further verification as needed. This may occur if new discrepancies are discovered or if the FPS identifies additional issues in subsequent reports.

Internal Controls and Methodology:

Documentation Consistency: With the use of ctcLink, institutions implement JP to ensure that each applicant's documentation is reviewed consistently.

Staff Training: Financial aid staff receive regular training on verification procedures to ensure they are applied uniformly. This includes JP.

Audit Trails: The institution maintains the required audit trails of all verification activities, including documentation received, decisions made, and corrections submitted. This ensures transparency and accountability in the verification process. By implementing these procedures, the institution aims to maintain the integrity of the financial aid process, ensure compliance with federal regulations, and provide equitable treatment to all applicants.

Quality Assurance Reviews: A periodic internal quality assurance audit reviews a sample of verified applications to ensure that verification procedures are being applied consistently and correctly. Any discrepancies identified in these reviews will be addressed immediately, and procedures will be adjusted as necessary to maintain consistency.

Compliance Checks: Periodic compliance checks are conducted to ensure that the selection process adheres to federal guidelines and institutional policies.

10.6 Data Elements to be Verified

Policy

For each processing year, JP relies on the information listed in the Federal Register, normally published in September prior to the next academic year's federal financial aid processing cycle. This notice defines which Verification Tracking Groups are applicable for the new cycle, and which data items must be verified for each tracking group.

Additionally, JP relies on the published Federal Student Aid (FSA) Federal Student Aid Handbook that provides sub-regulatory guidance.

Students who are selected for verification by the U.S. Department of Education will be placed in one of three verification groups (V1, V4, or V5) to determine which FAFSA®

information must be verified. Groups V2, V3, and V6 are reserved for future use by the U.S. Department of Education.

V1-Standard Verification Group
Tax filers (student, student spouse, parent, and parent spouse/partner, as applicable) must verify the following:
- Adjusted gross income
- Income earned from work
- U.S. income tax paid
- Untaxed portions of IRA distributions
- Untaxed portions of pensions
- IRA deductions and payments
- Tax exempt interest income
- Education Credits
- Foreign income exempt from federal taxation
- Family size

Non-tax filers (student, student spouse, parent, and parent spouse/partner, as applicable) must verify the following:
- Income earned from work
- Family size

V4-Custom Verification Group
Students must verify the following:
- Identity

V5-Aggregate Verification Group
This group is essentially a combination of V1 and V4. Tax filers and non-tax filers must verify the items listed in the Standard Verification Group (V1). Students must also verify their identity.

On July 1, 2023, because of statutory changes enacted through the FAFSA® Simplification Act, confined or incarcerated individuals enrolled in approved prison education programs (PEPs) became eligible for federal Pell Grants.

A confined or incarcerated individual, as indicated through the incarcerated applicant flag, will be considered verified if the student's identity was verified by a responsible official at the facility where the individual is confined or incarcerated. In this instance, an institution must retain as documentation an electronic or paper confirmation of the student's identity verification, the responsible individual at the facility, and the name of the institutionally authorized representative who performed the verification.

Procedure
The financial aid team is responsible for verifying documents uploaded to ctcLink. The team members use ctcLink to review forms where corrections, updates, and verification codes are made and later transmitted to FPS. The transmission is done via batch processing. Batch correction files may be transmitted to the Student Aid Internet

Gateway (SAIG) mailbox (located within the FSA Partner Connect Account Access Management Center), if JP chooses to do so JP. Corrections may also be done manually through the FAFSA® Partner Portal, if applicable.

General tips for successfully submitting batch corrections can be found under *"Correction Processing"* in the FAFSA® Specifications Guide Volume 3. Additional guidance for avoiding common edits and rejects and resolving verifiable and non-verifiable rejects is outlined in the *"Data Edits"* section of Volume 5 of the FAFSA® Specifications Guide Volume 5.

Reporting Verification Tracking Groups V4 and V5 Outcomes

Starting with the 2025-26 award year, JP must verify the identity of students selected for V4 and V5 through the FAFSA® Partner Portal, as mandated by the U.S. Department of Education.

Whom to Report

JP will report the results for any student with an ISIR in Verification Tracking Group V4 or V5 for whom verification documentation has been requested. This reporting function applies only to students designated by the FAFSA® Processing System (FPS) and not those selected by JP.

When to Report

JP will report verification outcomes within 60 days of requesting documentation and within 30 days of any changes. Since the Verification of Identity function will be available from August 31, 2025, initial identity outcomes or changes for V4 or V5 must be completed within the standard timeframes or when the function is available, whichever is later.

How to Report

In the FAFSA® Partner Portal, JP will see a list of applicants assigned to V4 or V5 who included the institution's school code on their FAFSA®. The list can be filtered and sorted as needed.

Verification results can be submitted individually or in batches using a .CSV file for up to 2,000 students (V4 V5 Verification Report Processing Business Process Guide | 9.2 FA - Financial Aid Business Process Guides | ctcLink Reference Center). Each record must contain:

- Nine-digit Social Security number
- Last name
- Verification result numeric code

Identity Verification Numeric Codes

Use these codes for reporting:
1 = Verification completed in person, no issues found
2 = Verification completed remotely, no issues found
3 = Verification attempted, issues found with identity

4 = Verification attempted, issues found with HS completion
5 = No response from applicant or unable to locate
6 = Verification attempted, issues found with both identity and HS completion

Tax Return Transcript
If contributors are unable to transfer their Federal Tax Information (FTI) via the Financial Aid Direct Data Exchange (FA-DDX) and are selected for verification (either by the U.S. Department of Education or the Financial Aid Office), they must submit their IRS Tax Return Transcript for review. Tax Return Transcripts do not need to be signed unless the Financial Aid Office questions the authenticity of the documentation.

For detailed guidance, refer to the “2023 Verification Data and Federal Tax Forms Comparison” chart at: Askregs.NASFAA.org.

Note: If the transcript shows a “per computer” amount for tax data, this corrected figure should be used, as it is more accurate than the original return. However, any "recomputed" amounts on the transcript should be disregarded for verification purposes.

Tax Return (1040 or 1040-NR)
While FTI transferred via the FA-DDX is preferred for verification, JP understands that this option may not be available to all students. In such cases, students may submit a ‘wet’ signed and dated copy of their Tax Return, along with all applicable schedules or an IRS Tax Return Transcript.

Note: A signature on IRS Form 8879 is not an acceptable substitute.

Please see the following chart that shows the tax form line numbers for the required verification items from the 2023 IRS Form 1040 (or IRS Form 1040-NR):

Item	2023 IRS Form 1040 or IRS Form 1040-NR
AGI	Line 11
Income Earned from Work	Line 1z + Schedule 1: Lines 3 + 6
U.S. Income Tax Paid	Line 24
Untaxed Portions of IRA Distributions (excluding rollovers)	Lines 4a – 4b
Untaxed Portions of Pensions (excluding rollovers)	Lines 5a – 5b
IRA Deductions and Payments	Schedule 1: Lines 16 + 20
Tax Exempt Interest Income	Line 2a
Education Credits	Line 29 + Schedule 3: Line 3
Foreign Income Exempt from Federal Taxation	Schedule 1: Line 8d

Wage and Income Transcript

Upon reviewing the Wage and Income Transcript, the institution is responsible for verifying whether the student accurately reported their Income on the FAFSA® and determining whether the student is required to file taxes.

If it is determined that a student's Taxable Earnings exceed the IRS Tax Filing Requirement and they have not filed their taxes, the student will be ineligible for Title IV aid until their IRS Tax Filing Status is resolved.

- Submission of Proof of Filing is required for verification clearance

Joint Tax Return Filers Who Are No Longer Married

If a student or the parents of a dependent student filed a joint tax return but have since separated, divorced, remarried, or been widowed, it may be necessary to determine their individual income and taxes paid using the joint return and Wage and Income Transcript. In such cases, the following must be submitted for review:

- A transcript obtained from the IRS or other relevant tax authority that lists appropriate year tax account information of the tax filer(s); **or**
- A copy of the income tax return and the applicable schedules that were filed with the IRS or other relevant tax authority that lists appropriate year tax account information of the tax filer(s); **and**
- A copy of IRS Form W-2 for each source of appropriate year employment income received or an equivalent document.

Methods of Separating a Joint Return

Tax Table

Example: The student filed a joint return with their spouse but has since divorced.

- The AGI on the FAFSA® matches the joint AGI of $56,500 and $3,264 reported as Income Tax Paid.
- Review of the student's Wage and Income Transcript shows the student's earned income portion of the AGI as $25,900.
- The student is eligible for the Standard Deduction of $12,950.
- Calculation: $25,900 - $12,950 = $12,950 (Student's Total Taxable Income)
- Using the 1040 Tax and Earned Income Credit Tables (https://www.irs.gov/pub/irs-prior/i1040tt--2023.pdf), the taxable income of $12,950 equals $1,298 in taxes paid.

Note: Unless the return was amended for an alternative tax filing status, the filing status remains the same when making the correction.

Proportional Distribution

Example: The student filed a joint return with their spouse in 2023 but has since divorced

- The AGI on the FAFSA® matches the joint AGI of $56,500 and $3,264 reported as Income Tax Paid.
- Review of the student's Wage and Income Transcript shows the student's earned income portion of the AGI as $25,900.

- $25,900/$56,500 = The student earned 46% (Rounded from 45.8%) of the total combined AGI.
- Therefore, using the same percentage, 46%, for Income Tax Paid.
    - o $3,264 x .46 = $1,501.44 Student Income Tax Paid

Individuals with Filing Extensions

Granted a Filing Extension:

For individuals granted an IRS filing extension beyond the automatic six-month extension for the tax year, the following must be submitted:

- A copy of the IRS approval for the extended filing period.
- A copy of IRS Form W-2 or an equivalent document for each source of employment income.
- If self-employed, the signed statement must indicate the amount of estimated AGI and U.S. income tax paid for the tax year

Note: Individuals with income exceeding the Tax Filing Requirement and an approved extension must submit their final Tax Return to the Financial Aid Office to re-verify income details.

Called Up for Active or Qualifying National Guard Duty:

For individuals called to active duty or qualifying National Guard duty during a war, military operation, or national emergency, the Financial Aid Office will accept a statement from the student or soldier certifying that they have not filed an income tax return or requested a filing extension due to their service.

Filers of Amended Returns

Filers of Amended Returns whose FTI Transferred via the FA-DDX:

For students or parents who filed an amended tax return (IRS Form 1040X), only the original tax information is transferred to the FAFSA® via the FA-DDX.

- If the Financial Aid Office becomes aware of an amended return, they may use discretion to update or correct the student's FAFSA® but are not required to do so. If an ISIR is selected for verification and the FTI is transferred from the IRS, the ISIR can still be considered verified without additional documentation.

If the Financial Aid Office opts to correct the FAFSA® using amended tax information:

- The specialist must submit changes for non-dollar items and single monetary items of $25 or more.
- The Professional Judgment flag must be checked to ensure the manually entered tax information is used to calculate the student's SAI and Pell Grant eligibility instead of the FTI transferred via the FA-DDX.

Filers of Amended Returns whose FTI was not transferred via the FA-DDX:

If a contributor was unable to transfer their FTI to their FAFSA® via the FA-DDX and the Financial Aid Office has reason to believe the student amended their Tax Return, the following must be submitted:

- A signed copy of the IRS Form 1040X and a signed copy of the IRS Form 1040 with all applicable schedules filed.
- A Record of Account Transcript from the IRS, detailing tax account information.

Note: Regardless of whether a Contributor transferred their FTI via the FA-DDX, a Tax Return Transcript alone is insufficient, as it does not reflect changes made by the filer or the IRS.

For additional information regarding Federal Regulations related to Verifying Amended Returns:
- FSA Handbook, Chapter 4 Verification
- Askregs NASFAA Amended Taxes

Victims of Tax-Related Identity Theft

In the past, the U.S. Department of Education has requested individuals who are victims of IRS tax-related identity theft to obtain a Tax Return Database View (TRDBV) transcript from the IRS for verification purposes. However, the U.S. Department of Education is aware that TRDBV transcript requests have been taking over a year to process. Due to the long processing time, individuals who are victims of IRS tax-related identity theft are required to provide a copy of the following:
- A signed copy of the income tax return and applicable schedules the individual filed with the IRS; **and**
- An IRS 4674C letter (a letter from the IRS acknowledging the identity theft) or a statement signed and dated by the tax filer indicating that he or she was a victim of IRS tax-related identity theft, and the IRS is aware of it.

This change to the required documentation was provided in "Dear Colleague Letter GEN-24-10"

Immigrants and Tax Filing

- Immigrants are not exempt from U.S. tax filing requirements. The IRS determines tax obligations based on whether an individual is a resident or non-resident alien. Keep in mind, the IRS is more concerned with whether a person is a resident or nonresident for U.S. tax filing purposes rather than whether they are a legal or illegal alien.
- An alien is anyone who is not a U.S. citizen or national (i.e., Resident, Nonresident, Legal, or Illegal Alien)
    - Resident Alien: Anyone who is either a permanent resident or has resided in the U.S. for a specific, minimum amount of time
        - Income is generally subject to tax in the same manner as U.S. Citizens, and they file Form 1040
    - Nonresident Alien: Anyone who does not meet the Resident Alien criteria
        - Required to file Form 1040-NR
- Visit USCIS Continuing Residency Policy for detailed requirements to determine if a student is a resident or nonresident alien
- ITIN Application: Immigrants without an SSN can apply for an Individual Taxpayer Identification Number (ITIN) from the IRS, which is used solely for tax purposes.

10.6.1 Acceptable Documentation

Policy

Applicants selected for verification must provide the requested information or documentation to be eligible to receive Title IV funds at the institution.

JP follows the procedures published in the Federal Register for each applicable FAFSA® processing year for items to be verified and documentation specified. Below is a summary of Verification items and documentation:

Income Information for Tax Filers

The importation of IRS tax data (FTI) via the FA-DDX serves as verification documentation. Applicants and contributors will not see or be given the option to change FTI imported directly from the IRS via the FA-DDX. Data transferred in this manner is considered verified, but there may be other data elements that must still be verified with additional documentation. 34 CFR 668.57(a)

Acceptable Documentation for income information for tax filers is as follows,

A. Adjusted Gross Income (AGI)
B. Income Earned from Work
C. U.S. Income Tax Paid
D. Untaxed Portions of IRA Distributions
E. Untaxed Portions of Pensions
F. IRA Deductions and Payments
G. Tax Exempt Interest Income
H. Education Credits
I. Foreign Income Exempt from Federal Taxation

Items (A) through (H), if transferred directly from the IRS and unchanged, do not need to be verified.

When information is not transferred from the IRS, and for item (I), the following documentation is sufficient for verification:

- A transcript obtained at no cost from the IRS or other relevant tax authority of a U.S. territory (Guam, American Samoa, the U.S. Virgin Islands) or commonwealth (Puerto Rico and the Northern Mariana Islands), or a foreign government, that lists tax account information of the tax filer; or
- A signed copy of the income tax return) and the applicable schedules that were filed with the IRS or other relevant tax authority of a U.S. territory, or a foreign government that lists tax account information of the tax filer.
- If item (D) or (E) contains a rollover, a signed statement confirming the amount of the rollover in the untaxed pension or IRA distribution. Note that even if (D) or (E) is transferred as FTI, rollovers still need to be verified as they are manually entered.

Qualified rollovers from one retirement account to another are not taxable, and they should not be counted as untaxed income (Untaxed portions of IRA distributions (D) or Pensions (E) above). Since neither a tax transcript nor FTI transferred via the FA-DDX identifies rollovers, you must get documentation from the tax filer. This could be a signed statement with the rollover amount or a notation by the filer on the tax transcript or return that includes the word “rollover” beside any applicable item, like the instruction the IRS gives for Form 1040. The annotation must be signed and dated by the filer.

<u>Income Information for Non-Tax Filers</u>

Income Earned from Work:

For an individual who has not filed and, under IRS or other relevant tax authority rules (e.g., the Republic of the Marshal Islands, the Republic of Palau, the Federated States of Micronesia, a U.S. territory or commonwealth, or a foreign government), is not required to file an income tax return, acceptable documentation is as follows,

1. A signed and dated statement certifying,
    a. That the individual is not required to file an income tax return; and
    b. The sources and amounts of earnings, other income, and resources* that supported the individual(s) for the tax year.
2. For individuals without a Social Security number (SSN), Individual Taxpayer Identification Number (ITIN), or Employer Identification Number (EIN), a signed and dated statement certifying that they do not have an SSN, ITIN, or EIN;
3. A copy of IRS Form W-2 for each source of employment income received or an equivalent document; and
4. Except for dependent students, verification of non-filing for individuals who would file a return with a relevant tax authority **other than the IRS**, dated on or after October 1 of the relevant FAFSA® tax year.

*For non-tax filers/you must request a W-2 form for each source of employment income and a signed statement certifying that the person has not filed and is not required to file a tax return. You must also get a signed statement giving the sources and amounts of the person’s income earned from work not found on W-2s. Students may sign on a non-filing spouse’s behalf.

For residents of the Freely Associated States (the Republic of the Marshal Islands, the Republic of Palau, or the Federated States of Micronesia), a copy of the wage and tax statement from each employer (substitute for W-2s) and a signed statement identifying any other employment income for the year not identified on the wage and tax statement is acceptable. Persons from a U.S. territory, commonwealth, or a foreign country who are not required to file a tax return can provide a signed statement, as well as any supporting documentation they might have (e.g., a form comparable to a U.S. W-2), certifying their income.

The collection of documentation to verify income earned from work is used to determine if the applicant (and the applicable spouse or parent) was required to file a U.S. income tax return (or a return with a relevant tax authority) for the tax year. If the individual should have filed but failed to do so, that is conflicting information that you must resolve.

<u>If a W-2 is not available</u>

If an individual who is required to submit an IRS Form W-2 did not save a copy, they should request a replacement W-2 from the employer who issued the original. A Wage and Income transcript from the IRS is also acceptable, though it generally is not available until the year after the W-2 information is filed with the IRS (e.g., 2025 for 2023 information filed in 2024). If they are unable to obtain one in a timely manner, you may permit them to provide a signed statement that includes the amount of income earned from work, the source of that income, and the reason why the W-2 is not available in a timely manner.

Family Size
Since family size is based on the number of individuals listed and claimed on the IRS tax return, if transferred directly from the IRS and unchanged, family size does not need to be verified. However, when information is not transferred from the IRS, or if the applicant updated their family size when presented with the opportunity to do so on their FAFSA®, the following documentation is sufficient for verification 34 CFR 668.57(b):

- A statement signed by the applicant and, if the applicant is a dependent student, by one of the applicant's parents, that lists the name and age of each family member for the applicable FAFSA® award year and the relationship of that family member to the applicant.

For a dependent student, you don't have to verify family size in the following situations:

- The family size is reported as two with a single, divorced, separated, or widowed parent; or
- The family size is reported as three with parents who are married or are unmarried and living together.

For an independent student, you don't have to verify family size in the following situations:

- The family size is reported as two if the student is married, or
- The family size is reported as one if the student is single, divorced, separated, or widowed.

Keep in mind that family size needs to align with the answers to the relevant dependency status questions, such as the question about having dependents other than a spouse. If verification reveals that answers do not match, the FAFSA® form needs to be corrected so that the information matches.

Identity Confirmation Requirements
Students should appear in person at their institution and present a valid, unexpired, government-issued photo identification (ID) such as a U.S. passport, a driver's license, or other state-issued ID.

"Unexpired" means the ID has not expired at the time it is checked, even if it will expire before the end of the award year. A valid government-issued photo identification is one issued by the U.S. government, any of the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, a federally recognized American Indian and Alaska Native Tribe, American Samoa, Guam, the Virgin Islands, the Commonwealth of the

Northern Mariana Islands, the Republic of the Marshal Islands, the Federated States of Micronesia, or the Republic of Palau.

The Financial Aid Office must maintain an annotated copy of that ID that includes the date it was received and the name of the person from the institution authorized to receive it. The institution may determine which of its staff is authorized to review an applicant's identity. It is recommended that the person(s) be full-time staff, and the institution keeps a record of who they are.

The following are NOT acceptable documentation for identity verification:
- An ID issued by a state university or college.
- A military ID (18 U.S. Code § 701 prohibits it from being photocopied).

A student who is unable to appear at the institution can now have the option of appearing on a video call to present an unexpired, valid, government-issued photo identification to an institutionally authorized individual who will review the identification per Electronic Announcement APP-25-16. The applicant can still, but will no longer be required to, submit a copy of their identification document that is acknowledged in a notary statement or that is presented to a notary. The video call option will require the institution to maintain a scanned copy (electronic or hardcopy) of the identification documentation that includes the date it was presented and the name of the authorized representative who reviewed the documentation. This can be accomplished through a screenshot of the video call that has legible details of the identification.

The REAL ID Act affects people entering certain restricted areas where identification is required: federal facilities, nuclear power plants, and federally regulated commercial airplanes. Because there are currently no restrictions under the act on agencies accepting an ID that is not compliant with the act (typically one marked "not for federal identification") for other purposes, such an ID is acceptable for verification of identity. It must be a government-issued ID that has not expired and includes the student's photo and name.

For unique circumstances, the institution should rely on the guidance provided in the applicable processing year's FSA Handbook, Chapter 4, Verification, Updates and Corrections.

Procedure

V1 – Standard Verification Group

- Tax Filers: (Student, Student Spouse, Parent, and Parent Spouse/Partner, as applicable) must verify the following based upon the February 23, 2017, Electronic Announcement:
    - Adjusted Gross Income (AGI), Income Earned from Work, Foreign Earned Income, U.S. Income Tax Paid, IRA Deductions and Payments, Tax Exempt Interest Income, Education Credits
        - If consent and approval were provided during the completion of the FAFSA® Application, and Federal Tax Information (FTI) was transferred

successfully from the IRS via the FA-DDX and unchanged, no additional documentation is required.

- o If FTI was not successfully transferred from the IRS via FA-DDX, the following documentation is required from each applicable contributor.
  - A Tax Return Transcript from the IRS or other relevant tax authority of a U.S. Territory
  - A signed copy of the Income Tax Return and all applicable schedules
  - A signed copy of any applicable Foreign Income Tax Returns
- Untaxed Portions of IRA Distributions or Pensions
  - o This information is not transmitted via FA-DDX. If this is applicable, the contributor will be required to submit:
    - A signed statement with the rollover or pension amount, or
    - Make a notation on the applicable lines on the Tax Return Transcript that include the word ‘Rollover’ or ‘Pension’.
      - ▪ All notations on official documents must be signed and dated by the Tax Filer
  - o Note: Qualified rollovers from one retirement account to another are not taxable and should not be counted as untaxed income
- Family Size
  - o Family size is based on the number of family members that were listed and claimed on a contributor's IRS Tax Return.
  - o If the family size transferred via the FA-DDX remains unchanged, verification is not required.
  - o If the family size was not transferred via the FA-DDX or was updated after the transfer, a V1 worksheet is required and must:
    - List the Name, Age, and Relationship of each family member to the student
    - Be signed by the student and applicable contributors

- <u>Non-Tax Filers</u>: (Student, Student Spouse, Parent, and Parent Spouse/Partner, as applicable) must verify the following:
- Income Earned from Work
  - o A Wage and Income Transcript or Foreign Income Statement
    - Upon reviewing the Wage and Income Transcript, it is JP responsibility to verify whether the student accurately reported their Income on the FAFSA® and determine if the student is required to file taxes.
    - If it is determined that a student’s Taxable Earnings exceed the IRS Tax Filing Requirement and they have not filed their taxes, the student will be ineligible for Title IV aid until their IRS Tax Filing Status is resolved.
      - ▪ Submission of Proof of Filing is required for verification clearance
- Family Size
  - o Family size is based on the number of family members that were listed and claimed on a contributor's IRS Tax Return.
  - o If the family size transferred via the FA-DDX remains unchanged, verification is not required.

- If the family size was not transferred via the FA-DDX or was updated after the transfer, a V1 worksheet is required and must:
    - List the Name, Age, and Relationship of each family member to the student.
    - Be signed by the student and applicable contributors.

V4 – Custom Verification Group
Students have 3 options to complete their Identity Verification:
1. In Person: Students must present a valid, unexpired, government-issued photo ID such as a U.S. Passport, Driver's License, or other State-Issued ID
    a. College, University, and Military IDs are accepted documentation for Identity Verification
2. Video Call: Students who are unable to appear in person at the Financial Aid Office can present a valid, unexpired, government-issued photo ID, such as a U.S. Passport, Driver's License, or State-issued ID, via video call.
3. Notary Public: Students who are unable to appear in person at the Financial Aid Office can visit a Notary Public, and present a valid, unexpired, government-issued photo ID such as a U.S. Passport, Driver's License, or other State-Issued ID. Students do not need to submit a copy of their identification document that is acknowledged in a notary statement.
    a. College, University, and Military IDs are not sufficient for Identity Verification
    b. The U.S. Department of Education and JP do not authorize the use of an online notary.

V5 – Aggregate Verification Group
This group is a combination of the V1 and V4 verification groups. Please reference all outlined requirements for V1 and V4 verification groups in the specified categories above.

10.6.2 Signatures
The E-Sign Act permits schools to use electronic signatures and electronic records in place of traditional signatures and records that, under the HEA and underlying regulations, otherwise must be provided or maintained in hard-copy format.

Policy
Unless a statute or regulation specifically requires a school to provide or maintain a record or document on paper, obtain a pen and paper signature, or send a notification or authorization via U.S. mail, JP will:
- provide and maintain that record electronically,
- obtain the signature electronically as long as the electronic process complies with the E-Sign Act and all other applicable laws, and
- provide notices or receive authorizations electronically.

Procedure

JP will accept electronic signatures on verification worksheets or other signed statements for verification purposes. JP can accept a written (paper or electronic) copy of a verification worksheet or signed statement as long as it contains a signature. Acceptable examples would include, but are not limited to:

- A wet signature on a worksheet or statement that the student either mails or brings to the school.
- A wet signature on a worksheet or statement that the student faxes, scans, photographs and emails, texts, or uploads to the school.
- An electronic copy of a worksheet or statement that the student signs with a stylus or finger and mails, emails, texts, or uploads to the school.
- An electronic copy of a worksheet or statement that has an image of the student’s signature attached and that the student mails, emails, texts, or uploads to the school.

Beyond the above allowances JP authenticates the student's identity as a condition of electronically signing a document.

JP can accept electronic signatures on non-loan financial aid documents as long as the institution adheres to the guidance provided by ED in GEN-01-06, *Standards for Electronic Signatures in Electronic Student Loan Transactions (Standards)*.

10.7 Conflicting Information

Policy

Institutions will verify all required information for students selected for verification by the Federal Processing System (FPS) or the institutions. In addition, institutions will also review all submitted documents to clarify any conflicts between these documents, the student's FAFSA®, and the eligibility requirements for federal Title IV financial aid. This includes, but is not limited to, citizenship or eligible non-citizenship status, identity, dependency status, marital status, tax filing status, receipt of FAFSA® untaxed income, reporting of business and personal assets, and any other data item that may impact eligibility 34 CFR 668.16(f).

If necessary, students will be advised on the requirement to submit additional documentation. This may include,

- Signed statements from student/parent(s), documentation provided by third parties, and
- Official documentation from private and governmental organizations.

Students whose records contain conflicting information will be notified and provided with instructions on what documentation is required to resolve the conflict. At the institution’s discretion, a student selected for verification by the FPS or the institution may be assigned an additional verification status type, and students not already selected may be selected for verification.

Conflicting information, such as discrepancies between the FAFSA®, submitted documents, and/or the verification worksheet, must be identified and corrected on the FAFSA®, as necessary. 34 CFR 668.54(a)(2).

- If conflicting information is identified prior to the origination of any loan, disbursement of federal aid, or FWS assignment, aid processing will be placed on hold until the conflicting information is resolved. If FAFSA® corrections are required, processing will remain on hold until the receipt of a corrected FAFSA® ISIR.
- If conflicting information is discovered after disbursing federal aid and corrections reduce eligibility, the student will be required to repay any excess funds. If a student is no longer enrolled, the institution will report the overaward to the U.S. Department of Education.

The same notification as listed within the Verification policy will be followed to inform the student of any changes to federal aid eligibility and changes to their SAI.

JP

Procedure

During review of students' accounts, whether selected for verification or not, staff will note any issues that cannot be resolved and could impact financial aid eligibility. In such cases, checklists will be added to students' accounts explaining what additional documentation is required.

Referrals to the Office of Inspector General of the U.S. Department of Education

JP will refer applicants to the Office of Inspector General (OIG) when any credible information indicates that an applicant for Title IV, HEA program assistance may have engaged in fraud or other criminal misconduct in connection with his or her application.

<<Insert College Procedures>>

10.8 Database Matches, Reject Codes & C-Codes

Policy

JP policy is to review each ISIR that is received for database mismatches, reject codes, and C codes that affect student eligibility. These are systematically checked in ctcLink using the ISIR of record, or by logging into FPS, to determine which information is missing or conflicting. All issues are resolved prior to the creation of the student's initial financial aid offer. Adequate controls are in place to identify and resolve any new information received after the initial financial aid offer, which may require additional follow-up for subsequent ISIR transactions.

Procedure

The institutional ISIR review process is as follows:

- The annual ISIR Guide from the U.S. Department of Education (ED) is utilized as a guide in establishing the institutional review procedures and determining the items that require follow-up for each award year.

- ctcLink is designed to flag all ISIR transactions that require resolution, so they are not packaged for aid.
- The financial aid staff will review each ISIR that is flagged and will send follow-up messages to each student as appropriate.
- The ctcLink system has tracking features that indicate what was requested, the date of the request, and when the information was received.
    - The messages to students contain specific instructions as to what information is required to complete the student's file.
    - The system sets a flag to stop further processing until all requested information has been received.
    - The ctcLink tracking is updated with the received date as information is provided.
- When all requested information has been received, the student's file is sent to a financial aid staff member for follow-up.
- The appropriate ISIR data elements are updated in ctclink by the financial aid staff, and ISIR corrections are sent to the FPS for reprocessing when appropriate.
- When the corrected ISIR transaction has been received and all edits have been resolved, the Review Status in ctcLink needs to be updated to Review Complete, whereupon the student will be selected in the Set Ready to Package status.

    <<Insert College Procedure>>

10.9 Deadlines

Policy

Student Responsibility Deadlines:

Selected students are encouraged to complete verification within JP days from the date of email notification to complete verification by submitting any requested documentation, including items not provided on the IRS Federal Transfer of Information (FTI). To ensure timely processing, students should submit all required verification materials by the end of the current academic year. All applications selected for federal verification must be completed within 120 days after the last date of enrollment to be eligible for Pell disbursements, applicants to Campus-Based programs and the Direct Loan program must complete verification by the same deadline or by JP days after the last date of enrollment to be eligible for those disbursements.

According to parameters as outlined in Chapter 1 of the Application and Verification Guide in the FSA Handbook, the FPS must receive a student's electronic FAFSA® information by June 30th of each year.

Procedure

Students must complete verification and all required eligibility review processes before they are offered a financial aid offer.

JP will not disburse any Title IV funds to applicants who fail to provide the requested documentation to verify information on the ISIR.

10.10 Student Notification of Verification Changes

Policy

Once all flagged issues, verification requirements, or C-Codes are resolved, the Financial Aid Office updates the student's financial aid record, ensuring that eligibility is confirmed, and aid can be disbursed.

All actions taken are documented in the student's file for compliance and audit purposes. This ensures that all ISIR changes are promptly reviewed and addressed, maintaining the accuracy and integrity of the financial aid process.

Procedure

If the verification process results in a change to a student's Title IV aid eligibility (positively or negatively), the student will be notified via ctcLink with an updated Offer Letter.

If Federal Title IV Verification is approved:

- The student will receive written notification through ctcLink.
- The student account will be reviewed for eligibility and any other outstanding financial aid requirements.
- If applicable, revisions will be made to a student's FAFSA®.
- If applicable, revisions will be made to a student's financial aid offer.
- Student's file will be documented with the Federal Title IV Verification. determination, date of the action, and the person(s) involved in the determination.

If Federal Title IV Verification requires additional information/documentation for review:

- The student will receive written notification through JP
- The student will be responsible for contacting the Financial Aid Office directly regarding the request for additional information/documentation.
- Student's file will be documented with the Federal Title IV Verification determination, date of the action, and the person(s) involved in the determination.
- If the additional information/documentation is received before the deadline, it will be added to previously submitted documentation and returned to a financial aid staff member for review.
- If the additional information/documentation is not received before the deadline <<Insert College Deadline>>, the student's Federal Title IV Verification will be officially Unsatisfied, and the student will be referred to alternative payment methods.

If Federal Title IV Verification is Unsatisfied or Rejected:

- The student will receive written notification through ctcLink.
- Student's file will be documented with the Verification Determination, date of the action, and the person(s) involved in the determination.
- The student will be referred to alternative payment methods.

10.11 Subsequent ISIR Transactions

Policy

JP reviews all subsequent ISIR transactions and resolves any new information that may affect student eligibility as required by federal regulation. During the award year, this process is conducted daily as needed, ensuring that adjustments to the financial aid offer are responded to promptly.

Procedure

The ctcLink system has a selection set function that is utilized to identify all subsequent ISIR transactions received. The procedures for the review of a subsequent transaction include:

- The financial aid staff produces information regarding subsequent ISIR transactions in a query report and performs a preliminary review to determine which transactions require further review.
- The financial aid staff reviews the new ISIR transactions and follows the institutional procedures (as explained in the earlier section for initial ISIR transactions) for resolution.
- In the event the new information affects student eligibility and future disbursements, the system is updated with a flag to place the student's file on hold until the resolution has been finalized.
- In the event the actions taken from the review of the subsequent ISIR affect student eligibility (increases or decreases), the student is sent a revised financial aid offer indicating the reason for the changes.
- In cases where the student may become ineligible for federal Title IV aid, the funds are returned to the appropriate program, or, in the case of fraud, the student is referred to the Office of Inspector General for follow-up.
    - JP will forward to the Secretary of Education (U.S. Department of Education) the name, Social Security number, and other relevant information of an applicant who has received funds based on possibly incorrect information after JP has made a reasonable effort to resolve the discrepancy.
    - Students requiring Office of Inspector General assistance will be provided with contact information.

If the student was selected for verification after aid has been disbursed, and the student either does not complete verification by the established deadlines <<Insert College Deadline>>:

- All affected (federal) unpaid financial aid offers will be canceled.
- Students may be required to repay all Title IV funds (except Direct Loans) for which they are ineligible in accordance with federal overpayment policies.
- Students who do not repay funds for which they are ineligible will be referred to the U.S. Department of Education via the NSLDS overpayment process.

10.12 Interim Disbursements

Policy

JP will not make any disbursement of Title IV funds for a selected applicant who has not completed the verification process. 34 CFR 668.58. The Verification Exclusions part of this document reflects the exceptions to this rule.

Procedure
JP will not make any disbursement of Title IV funds for a selected applicant who has not completed the verification process.

10.13 Additional Review Requirements

Policy
JP does not use additional institution-specific need analysis of data elements for file review and verification.

Procedure
JP does not use additional institution-specific need analysis of data elements for file review and verification.

10.14 Systems/Resources Needed to Process Federal Title IV Verification

- ctcLink, https://myaccount.ctclink.us/
- ctcLink Reference Center
- FAFSA® Partner Portal
- How To Make Corrections in FAFSA® Partner Portal
- EdExpress - Log-in Required
- EdConnect – Log-in Required

Section 11: Professional Judgement – PJ (Special & Unusual Circumstance Appeals)

11.1 Overview

JP Financial Aid Office understands that, when completing either the Free Application for Federal Student Aid (FAFSA®) or the Washington Application for State Financial Aid (WASFA), there are Special and Unique circumstances in which college Financial Aid Administrators (FAA) are authorized to make appropriate, reasonable adjustments on a case-by-case basis in accordance with federal guidelines (See GEN-22-15 for additional guidance and discussion of the changes made by the FAFSA® Simplification Act and implemented beginning with the 2023-24 Award Year).

The FAFSA® Simplification Act (the Act) distinguishes between different categories of professional judgment by amending section 479A of the HEA.

- Special Circumstances refer to financial situations (loss of a job, etc.) that justify an aid administrator adjusting data elements in the COA or in the SAI calculation.
- Unusual Circumstances refer to the conditions that justify an aid administrator making an adjustment to a student's dependency status based on a unique situation (human trafficking, refugee or asylee status, parental abandonment or

estrangement, or student or parental incarceration), more commonly referred to as a dependency override.

2025-2026 FSA Handbook, Application and Verification Guide, Chapter 5 Special Cases

Note: WASFA regs follow FAFSA® PJ rules.

11.2 Professional Judgement (PJ)

Policy

A student may have both a special circumstance and an unusual circumstance. A college Financial Aid Administrator (FAA) may make adjustments that are appropriate to each student's situation, provided they are supported by appropriate documentation.

The reason for the decision to approve or deny a request for professional judgment and any subsequent adjustments should be documented. The documentation should substantiate the special or unusual circumstances that differentiate the student, not conditions that exist for a whole class of students.

In order to meet the standards for administrative capability at 34 CFR 668.16(f), JP must have an adequate internal system to identify conflicting information that would affect a student's eligibility. All conflicting information must be resolved prior to disbursing financial aid to an enrolled student.

FAAs must have a fundamental understanding of relevant tax issues that can impact the need analysis. They are obligated to know (1) whether a person was required to file a tax return and (2) what the correct filing status for a person should be (IRS Publication 17). Additional IRS publications can be found at https://www.irs.gov/forms-instructions-and-publications.

If fraud is discovered, it should be reported to the Office of Inspector General (OIG). 34 CFR 668.16(g), and if the student also received Washington State aid it should also be reported to WSAC (Washington Student Achievement Council).

OIG Contact Information:

- Address: OIG Headquarters, U.S. Department of Education, 400 Maryland Avenue, S.W., Washington, DC 20202-1500
- Web: https://oig.ed.gov/contact-us
- Hotline: https://oig.ed.gov/oig-hotline
- Phone: 1-800-MIS-USED (1-800-647-8733)
- Hours: Monday and Wednesday 9–11 a.m. Tuesday and Thursday 1–3 p.m.
- Regional Offices: An updated listing of regional offices and contact information is available at https://oig.ed.gov/contact-us.

WSAC Contact Information:

- Address: 1500 Jefferson Street SE, Olympia, WA 98501

- Web: Our Location | WSAC
- Email: info@wsac.wa.gov
- Phone: (360) 753-7800
- Agency Directory: Agency Directory | WSAC

Professional Judgment reviews will **never:**

- Result in a modification to the formula, or the tables developed by the U.S. Department of Education and used in a student's SAI calculation.
- Be used to circumvent the law or regulations.
- Make an otherwise independent student to dependent status.
- Be made without the appropriate documentation*.
- Be processed if a student has outstanding requirements.

* The reasons for the professional judgement should be appropriately documented in the student's record so that any aid provided as a result of the decision can be explained in an audit or program review. The documentation will also provide a history of the circumstances, providing other financial aid administrators a clear "paper trail" to understand how PJ was applied to a student or family's special or unusual circumstances.

The only adjustments that can be made are to the Cost of Attendance (COA) or the student-specific data used in their Title IV eligibility determination as it relates to their special or unusual circumstances.

In accordance with Federal deadlines and to ensure enough time for review, all complete JP are due on JP designated deadline each academic year to allow for processing and submission of Professional Judgment adjustments by JP.

JP will **not** be processed for a student after that student has ceased to be eligible, including when a student is no longer enrolled.

JP Financial Aid Office is held accountable for all professional judgment decisions and for fully documenting each decision.

There are no standard guidelines for documentation. Sufficient notes should be made so that another aid administrator reviewing the student's file can easily determine the reason for the PJ decision, as well as their effect on the need analysis and aid package. The documentation should include:

- A clear record of the decision made,
- The date of the decision,
- How the decision was reached,
- The outcome or resultant actions that were taken, and
- The name and title of the individual making the decision.

Procedure

All professional judgment FAFSA® adjustments **should** be made electronically, either via the FAFSA® Partner Portal (FPP) or on the ctcLink *ISIR Corrections* page **(Currently, SBCTC recommends that the FAA continue to make manual corrections directly in FPP - not via batch).**

Adjustments to data fields on the ISIR are done via batch processing. Batch correction files must be transmitted to the Student Aid Internet Gateway (SAIG) mailbox TGDE552 (located within the FSA Partner Connect Account Access Management Center).

Batch processing for the first time since FAFSA® Simplification via Electronic Data Exchange (EDE) may differ from prior experiences submitting corrections under the legacy Central Processing System (CPS). Please note:

- Corrections to a field that require adjustments to additional related fields must be submitted on the same transaction to avoid an error.
- The Professional Judgment (PJ) flag must be set to force the FAFSA® Processing System (FPS) to override the use of Federal Tax Information (FTI) from the IRS.
- **If you deselect all values for the Federal Benefits Received question,** you must set all values to blank (fields 75-83) **and** set "None of the Above (Federal Benefits)" (field 84) to "Yes."
- A professional judgment cannot be submitted on a rejected transaction.
- Corrections made to a financial information field that is not required to be answered to calculate a particular student's SAI calculation will be removed by FPS during processing and excluded from the corrected transaction.

General tips for successfully submitting batch corrections may be found under *"Tips for EDE Corrections"* in Volume 3 of the 2025-26 FAFSA® Specifications Guide. Additional guidance on avoiding common edits and rejects, and on resolving verifiable and non-verifiable rejects, is outlined in the "Data Edits" section of Volume 5 of the FAFSA® Specifications Guide.

- Professional Judgment adjustments do not require a student's signature on the revised transaction, as they signed the initial transaction and all required forms in the application process.
- When the new transaction is processed, it will be flagged with a 'Professional Judgment Processed' indicator.

To make adjustments to financial aid offers, use the ctcLink Assign *Award Override* search page, enter the required information, and click search. Use the *Professional Judgement* tab to enter financial aid offer adjustments. Use the *Validate* button to run the validation process before posting any financial aid offers. For more information, go to the ctcLink Reference Center, *Assign Awards & Override with Professional Judgement* guidance.

11.3 Request Process

Policy

JP Financial Aid Office will not consider a professional judgment determination unless it is requested by the student or their parents. Consideration will not take place until all required documentation is received.

If a student is requesting a professional judgment based on a change in income, the student may only submit one appeal for the award year.

Appeals apply to one academic year only and do not carry over to the next year. If the situation that caused a student to appeal persists into the next award year, it is the student's responsibility to file a new appeal.

Procedure

Minimum required Documentation for Professional Judgment Determinations:

- A Current Year Free Application for Federal Student Aid (FAFSA®) or the Washington Application for State Financial Aid (WASFA)
- Current Year Petition for Special Circumstance, as applicable available on the College website JP.
    - If the student answered "yes" to the unusual circumstances question on the FAFSA® or WASFA, ctcLink should already have a place to document the unusual circumstances and validate the provisional independent status they were granted.
    - If the student answered "no" to that question and their circumstances have changed, they will need to contact JP Financial Aid Office for assistance.
- All necessary supporting documentation (see specific requirements for each type of PJ determination),
    - Standard documentation may include,
        - Tax transcripts (or forms) for the most recent tax year
        - Birth or death certificates
        - Unemployment compensation information
        - Parent tax and/or financial information
- If a student was selected for verification by JP Financial Aid Office or the U.S. Department of Education, the verification should be completed first to ensure that the correct information is being used for a professional judgment consideration.
    - In this scenario, the verification and Professional Judgment adjustments can be made on the same ISIR transaction.
- If a student's application contains conflicting information or the application information is incorrect, the discrepancies should be resolved before disbursing Title IV funds or state aid and, as with verification, before making any PJ adjustment. If you discover discrepancies after disbursing Title IV funds, the conflicting information should be reconciled, and appropriate action should be taken under the specific program requirements (depending on the outcome, funds may have to be returned). 34 CFR 668.16(f), 34 CFR 668.54(a)(2), Electronic Announcement GEN-24-71

Note:

Before adjusting for an uncommon expense, consider whether it is already covered by the Income Protection Allowance (IPA), which is already included in the SAI calculation. It is reasonable to assume that approximately 30% of the IPA is for food, 22% for housing, 9% for transportation expenses, 16% for clothing and personal care, 11% for medical care, and 12% for other family consumption. The income protection allowance is one of the intermediate values in the FAA Information section of the output document (labeled as “IPA”).

The following table is based, in part, upon the April 2024 Consumer Price Index (CPI) for all Urban Consumers (CPI-U). More information (including indexes for various geographic regions) can be found at CPI Home: U.S. Bureau of Labor Statistics

Income Protection Allowance

Family Size (including student)	Income Protection Allowance Amount
2	$28,530
3	$35,510
4	$43,870
5	$51,750
6	$60,540

Note: For each additional household member, add $6,840.

All FAFSA® professional judgment adjustments **should** be made electronically, either via the FAFSA® Partner Portal or on the ctcLink ISIR Corrections page. **(Currently, SBCTC recommends that the FAA continue to make manual corrections directly in FPP - not via batch)**.

11.4 Special Circumstances

Policy

JP recognizes that students may experience financial circumstances requiring adjustments. Students experiencing unique financial challenges may request adjustments to their Cost of Attendance (COA) or to elements affecting their Student Aid Index (SAI) under professional judgment provisions. Examples of such circumstances include, but are not limited to:

- Change in employment status, income, or assets.
- Change in housing status (i.e. homelessness, unforeseen relocation, family size, separation or divorce, death of a spouse, parent, etc.).
- Unreimbursed tuition expenses at an elementary or secondary school.
- Additional family members enrolled in college.
- Medical, dental, or nursing home expenses for the student/impacting the student not covered by insurance.
- Child or dependent care expenses, such as daycare or eldercare for household members.
- Severe disability of the student or other member of the student’s household.

- Financial impacts from natural disasters (e.g., hurricanes, floods, or fires) or other qualifying emergencies (e.g., COVID-19).
- Legal or court-mandated expenses affecting the student's financial resources.
- Other changes or adjustments that impact the student's costs or ability to pay for college.

Special Circumstances that **do not** constitute a Professional Judgment Consideration include:

- Vacation Expenses
- Tithing Expenses
- Standard Living Expenses (Utilities, Credit Card Expenses, Children's allowances, etc.)

JP requires documentation for all Special Circumstance Professional Judgment Determinations.

Procedure

Required Documentation for Special Circumstance Professional Judgment Determination

- A Current Year Free Application for Federal Student Aid (FAFSA®) or the Washington Application for State Financial Aid (WASFA).
- Current Year <<Insert Name of Form, for example Professional Judgment application>>: All necessary supporting documentation (i.e., Applicable Tax Returns, Unemployment documentation, Documentation of applicable household changes, etc.).
- If a student was selected for verification by JP Financial Aid Office or the U.S. Department of Education, the verification should be completed first to ensure that the correct information is being used for a professional judgment consideration, except in cases where the resolution of verification depends on the outcome of the professional judgment (e.g., conflicting information tied to dependency overrides or income adjustments), where JP may proceed with the professional judgment to facilitate the completion of verification.
    - In this scenario, the verification and Professional Judgment adjustments can be made on the same ISIR transaction.
- If a student's application contains conflicting information or the application information is incorrect, the discrepancies should be resolved before disbursing Title IV funds or state aid and, as with verification, before making any PJ adjustment. If you discover discrepancies after disbursing Title IV funds, the conflicting information should be reconciled, and appropriate action should be taken under the specific program requirements (depending on the outcome, funds may have to be returned). 34 CFR 668.16(f), 34 CFR 668.54(a)(2), Electronic Announcement GEN-24-71

The family's available income is calculated by subtracting the total allowable expenses from total income. The remainder, if any, is presumed to be available for postsecondary education beyond the minimum level of support provided by the IPA, which is based on the U.S. Bureau of Labor Statistics lower budget standard.

11.5 Unusual Circumstances

Policy

Unusual Circumstances (more commonly referred to as a Dependency Override) that constitute a Professional Judgment consideration include, but are not limited to:

- Human trafficking (T non-immigrant status enables certain victims of human trafficking to remain in the United States for an initial period of up to 4 years.).
- Refugee (a legal status granted to someone who is unable or unwilling to return to their home country due to persecution or a well-founded fear of persecution) or asylee status (a legal status in the United States that allows a noncitizen to remain in the country and work, apply for a Social Security card, and petition to bring family members to the United States).
- Parental abandonment or estrangement.
- Student or parental incarceration.
- Abusive/unsafe family environment.
- Parents' location unknown.
- Parents are incapacitated.

In such cases, an override might be warranted based upon the student's individual circumstances. These conditions would also not disqualify a student from being a homeless unaccompanied youth or self-supporting and at risk of homelessness.

Unusual Circumstances that **do not** constitute a Professional Judgment Consideration:

- Parents' refusal to contribute to the student's education.
- Parents will not provide information for the FAFSA® or WASFA or verification.
- Parents do not claim the student as a dependent for income tax purposes.
- Student no longer living with parent(s) and demonstrates total self-sufficiency.
- Student reducing or stopping work to enroll in college.

If a student is determined to be dependent by the FAFSA® or WASFA, they qualify for a dependency override due to extenuating circumstances; they may submit an appeal by completing a Petition for Independent Status application.

Dependency Overrides cannot be requested for:

- Parents' refusal to contribute to the student's education.
- Parents' refusal to complete the FAFSA® or WASFA or provide information for verification.
- Parents not claiming the student as a dependent for income tax purposes.
- Student demonstrating total self-sufficiency.

Note: FAFSA® filers only: Students who are ineligible to submit an Unusual Circumstance Professional Judgment application may be eligible for a Dependent Level Unsubsidized Loan **only** up to the maximum eligibility based on grade level.

JP requires documentation for all Unusual Circumstance Professional Judgment Determinations.

Procedure
Required Documentation for all Unusual Circumstance Professional Judgment Determination

- A Current Year Free Application for Federal Student Aid (FAFSA®) or the Washington Application for State Financial Aid (WASFA)
  - Current Year Professional Judgment Application (If the student answered "yes" to the unusual circumstances question on the FAFSA® or WASFA, JP official notification process should already have a place to document the unusual circumstances and validate the provisional independent status they were granted.
  - If the student answered "no" to that question and their circumstances have changed, they will need to contact JP Financial Aid Office for assistance.
- All necessary supporting documentation (examples include but are not limited to):
  - A documented interview between the student and a JP Financial Ais Administrator.
  - A court order or official Federal or State documentation that the student or the student's parents or legal guardians are incarcerated.
  - A documented phone call or written statement on professional letterhead confirming a student's Unusual Circumstances and their relationship to the student from one of the following entities:
    - A state, county, or tribal welfare agency.
    - An independent living case worker who supports current and former foster youth with the transition to adulthood.
    - A public or private agency, facility, or program servicing the victims of abuse, neglect, assault, or violence.
    - An attorney, guardian ad litem, counselor, teacher, court-appointed special advocate, or a TRIO or GEAR UP program representative.
- Documentation requirements for Foster Care Youth
  - Adequate documentation that the student was in foster care at age 13 or older, in the absence of conflicting information:
  - Submission of a court order or official State documentation that the student received Federal or State support in foster care;
    - Washington State Resident Students - the first check can be through the WSAC Passport Portal, if the student is found there then that is verification they meet the FAFSA®/WASFA definition of foster care at age 13 or older.
  - A documented phone call or a written statement from an attorney, guardian ad litem, or Court Appointed Special Advocate;
  - Verification of the student's eligibility for an education and training voucher under the John H. Chafee Foster Care Program under section 477 of the Social Security Act (42 U.S.C. 677); or

    - A documented phone call or written statement from a financial aid administrator who documented the student's circumstance in the same or a prior award year.

- FAAs must also consider a phone call, written statement, or verifiable electronic data match from one of the following sources to be adequate documentation:
    - A State, county, or Tribal agency administering a program under part B or E of title IV of the Social Security Act (42 U.S.C. 621 et seq. and 670 et seq.);
    - A State Medicaid agency; or
    - A public or private foster care placing agency, foster care facility, or placement.

(GEN-22-15) FAFSA®® Simplification Act Changes for Implementation in 2023-24

- If a student was selected for verification by JP Financial Aid Office or the U.S. Department of Education, the verification should be completed first to ensure that the correct information is being used for a professional judgment consideration.
    - In this scenario, the verification and Professional Judgment adjustments can be made on the same ISIR transaction.
- If a student's application contains conflicting information or the application information is incorrect, the discrepancies should be resolved before disbursing Title IV funds and, as with verification, before making any PJ adjustment. If you discover discrepancies after disbursing Title IV funds, the conflicting information should be reconciled, and appropriate action should be taken under the specific program requirements (depending on the outcome, funds may have to be returned). 34 CFR 668.16(f), 34 CFR 668.54(a)(2), Electronic Announcement GEN-24-71

Students who indicate Unusual Circumstances that prevent them from providing parental data on their FAFSA® or WASFA application will be prompted on the FAFSA® or WASFA application to complete screening steps to confirm their unusual circumstances.

When the screening steps have been completed, the student's FAFSA® or WASFA application will be processed as 'Provisionally Independent' and subsequently produce a provisional SAI calculation. However, when JP receives the FAFSA® or WASFA application, it will be delivered as rejected, pending further action from JP Financial Aid Office. Within federal and state frameworks, JP will determine the documentation mentioned above to make a determination.

Note:
An aid administrator may **only** override from dependent to independent.

Note:

<<Insert CollegeName>> Financial Aid Office is **not** authorized to ask each student, every academic year, if their Unusual Circumstances have changed without justification in the definitions above

11.5.1 Unaccompanied Homeless Youth

[Unaccompanied Homeless Youth Determinations – Update (Updated July 19, 2024) | Knowledge Center]

Policy

JP accepts a student's status as unaccompanied homeless youth as reported on the FAFSA® when documentation from an authorized party is confirmed

If the student cannot provide documentation, JP Financial Aid Office will conduct a Professional Judgment determination based on the student's circumstances and available information.

Unusual Circumstances – Unaccompanied Homeless Youth OR Unaccompanied at Risk of Homeless Youth

- Unaccompanied means a student is not living in the physical custody of their parent or guardian.
- A student is considered homeless if they lack fixed, regular, and adequate housing (see definitions below), which extends beyond just living on the street.
- Homeless circumstances include, but are not limited to:
    - Youth sharing housing with other people temporarily because they have nowhere else to go.
    - Youth living in shelters, or a trailer provided by FEMA after a disaster.
    - Youth living in a motel, campground, car, park, abandoned building, bus or train station, substandard housing, or any public or private place not designated as a dwelling.
    - Youth who are migrants living in one of the circumstances described above.

Unaccompanied Youth Definition

- A student who is not living in the physical custody of their parent or guardian

Homeless Youth Definitions

- **At Risk of Being Homeless** – When a student's housing may cease to be fixed, regular, and adequate
- **Homeless** – Lacking fixed, regular, and adequate housing
- **Self-Supporting** – When a student pays for their 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

Housing Status Definitions

- **Fixed** – Stationary, Permanent, and not subject to change
- **Regular** – Used on a predictable, routine, or consistent basis

- **Adequate** – Sufficient for meeting both the physical and psychological needs typically met in the home

Procedure
If a student self-identifies as an unaccompanied homeless youth (UHY) without documentation on the FAFSA® or WASFA but later provides documentation from an authorized party, the Professional Judgment process will be discontinued. The authorized determination will resolve any conflicting information and be used to confirm the student's status. All updates and documentation will be maintained in the student's electronic file within the system of record (ctcLink) to ensure compliance with federal regulations.

Required Documentation for Unusual Circumstance Professional Judgment Determination – Unaccompanied Homeless Youth

- A Current Year Free Application for Federal Student Aid (FAFSA®) or the Washington Application for State Financial Aid (WASFA)
- Current Year Independent Student Status of Unaccompanied Homeless Youth Determination, and
- Supporting documentation that the student meets the definition of this category of independent student, such as (but not limited to):
  - A documented interview between the student and a JP Financial Aid Administrator.
  - A court order or official federal or state documentation that the student or the student's parents or legal guardians are incarcerated.
  - A documented phone call or written statement on professional letterhead confirming a student's unusual circumstances and their relationship to the student from one of the following entities:
    - A state, county, or tribal welfare agency.
    - An independent living case worker who supports current and former foster youth with the transition to adulthood.
    - A public or private agency, facility, or program servicing the victims of abuse, neglect, assault, or violence.
    - An attorney, guardian ad litem, counselor, teacher, court-appointed special advocate, or a TRIO or GEAR UP program representative.
  - Utility bills, health insurance, or other documents that demonstrate a separation from parents and/or legal guardians.
- If a student was selected for verification by JP Financial Aid Office or the U.S. Department of Education, the verification should be completed first to ensure that the correct information is being used for a professional judgment consideration. However, in cases where the resolution of verification depends on the outcome of professional judgment (e.g., conflicting information tied to dependency overrides or income adjustments), the College may proceed with the professional judgment to facilitate verification completion.
  - In this scenario, the verification and Professional Judgment adjustments can be made on the same ISIR transaction.

- If a student's application contains conflicting information or the application information is incorrect, the discrepancies should be resolved before disbursing Title IV funds and, as with verification, before making any PJ adjustment. If you discover discrepancies after disbursing Title IV funds, the conflicting information should be reconciled, and appropriate action should be taken under the specific program requirements (depending on the outcome, funds may have to be returned). 34 CFR 668.16(f), 34 CFR 668.54(a)(2), Electronic Announcement GEN-24-71

Note:
An aid administrator may **only** override from dependent to independent.

Note: Foster Youth and Unaccompanied Homeless Youth who are Washington residents may be eligible for the Passport to Careers program along with federal and state aid. This program provides funding for Washington state, federal, or tribal foster students, or for students who have experienced unaccompanied homelessness in the last school year.

For more information on the program or eligibility requirements, visit the Washington Student Achievement Council's website.
(https://wsac.wa.gov/sites/default/files/Passport.Student.FAQs.pdf)
(https://wsac.wa.gov/passport/guide)

11.5.2 Dependency Status Changes

Policy
JP Financial Aid Office will attempt to correct conflicting information per Title IV requirements.

Procedure
If a Federal Pell Grant or campus-based program applicant's dependency status changes during the award year or the original application was filed incorrectly,

- The applicant should file a correction application reflecting the changed status unless the change results from a change in marital status.

Federal Pell Grant applicants whose dependency status changes during the award year,

- The student should file a correction application unless the change results from a change in marital status, with the exception of families affected by Dear Colleague Letter GEN-13-25 regarding same-sex marriages.

Campus-based aid recipients whose dependency status changes during the award year,

- The student's SAI will be recalculated to determine eligibility for SAI-dependent financial aid offers.

11.6 Offering an Unsubsidized Direct Loan to a Student Whose Parent(s) Refuse to Complete the FAFSA®

Policy

Federal law states that a dependent student (based on the federal financial aid definition) must provide parental information on the Free Application for Federal Student Aid (FAFSA®). In cases where parents (both mother and father) have either:

- Permanently ended all financial support of the student or;
- Refuse to complete the parent section of the FAFSA®.

The student may submit a petition for a Direct Unsubsidized Loan.

Procedure

The student will need to correct their FAFSA® information by:

- Selecting the "I am unable to provide information about my parent(s)" option when the FAFSA® asks the student to provide parental information.
- The student will then be provided with an explanation of what is considered a special circumstance.
- The student should select the option that says, "I don't have a special circumstance but still cannot provide parent information."

Once this is done, the dependent student will receive a rejected Student Aid Report (SAR), and JP will receive a rejected Institutional Student Information Record (ISIR) without an SAI and with a special circumstances flag of "4."

Once this ISIR is received, JP may offer and originate the Direct Unsubsidized Loan, provided the student's eligibility database matches and the student is otherwise eligible for the loan.

The student remains a dependent student, so do not add a "dependency override" flag, because doing so would cause the FAFSA® Processing System (FPS) to treat the student as an independent student.

The parents must then sign a statement indicating that they:

1. Refuse to fill out the FAFSA® on the student's behalf; **or**
2. Do not provide any financial support to the student, indicating the date the support ended, and will not provide any financial support to the student in the future.

If the parents refuse to sign and date a statement to this effect, you must get documentation from a third party.

Once the student has corrected the FAFSA® and the rejected ISIR is received, use ctcLink to offer the unsubsidized loan to the student.

- Review the **ISIR Suspense Management** page to confirm the '*X Dependent Reject*' **Dependency Status** and the **ISIR Reject Reason** of '*Dependency Model is Dependent AND Unsub Only is "1" (Yes)*'.

- Set the **View Packaging Status** page **Database Matches** page with a **Special Circumstances** flag.
- Offer the student using the **Invoke a Professional Judgment** page.

For more information, go to the ctcLink Reference Center, *Awarding an Unsubsidized Direct Loan to a Student Whose Parent(s) Refuse to Support/Sign FAFSA®*, guidance.

11.7 Disaster, Emergency, or Economic Downturn

Policy

A JP Financial Aid Administrator may, during a qualifying emergency:

- Determine the income earned from work for an applicant is zero, if the applicant can provide paper or electronic documentation of receipt of unemployment benefits or confirmation that an application for unemployment benefits was submitted; and
- Make additional appropriate adjustments to the income earned from work for a student, parent, or spouse, as applicable, based on the totality of the family's situation, including consideration of unemployment benefits.

JP requires documentation for all Disaster, Emergency, or Economic Downturn Professional Judgment Determinations.

Procedure

Acceptable documentation of unemployment should be submitted not more than 90 days from the date it was issued. However, JP may use discretion to accept documentation older than 90 days under its general professional judgment authority if they do not have reason to believe there is conflicting information.

Note:

If a student was selected for verification by JP Financial Aid Office or the U.S. Department of Education, the verification should be completed first to ensure that the correct information is being used for professional judgment consideration.

- In this scenario, the verification and Professional Judgment adjustments can be made on the same ISIR transaction.

If a student's application contains conflicting information or the application information is incorrect, you should resolve the discrepancies before disbursing Title IV funds and, as with verification, before making any PJ adjustment. If you discover discrepancies after disbursing Title IV funds, the conflicting information should be reconciled, and appropriate action should be taken under the specific program requirements (depending on the outcome, funds may have to be returned). 34 CFR 668.16(f), 34 CFR 668.54(a)(2), Electronic Announcement GEN-24-71

11.8 Refusing or Reducing a Loan

34 CFR 685.301(a)(8)

Policy

A JP Financial Aid Administrator may also use its discretion to refuse or reduce Direct Loan funds if it:

- documents the reason,
- make the determination on a case-by-case basis,
- notify the student in writing, and
- ensure the decision is not due to discrimination based on race, national origin, religion, sex, income, age, or disability.

A JP Financial Aid Administrator may use its discretion on a case-by-case basis to reduce or refuse a student's Direct Loan funds for reasons such as (but not limited to):
- A student admitting or indicating that they do not intend to repay a student loan.
- A student admitting that they intend to use their Direct Loan funds for purposes other than their education (Vacation, Cosmetic Surgery, etc.).
- A student racking up a large loan balance based on future potential earnings for their major.

Procedure
Notifying a Student Their Direct Loan Has Been Refused or Reduced
- The student will receive written notification through JP official notification process.
- Applicable revisions will be made to the student's financial aid offers
- The student's file will be documented with the details used in the determination to refuse or reduce a student's Direct Loan, date of the action, and the person(s) involved in the determination.

11.9 Outcome of a Professional Judgment Review

Policy
When all required documentation has been submitted to JP Financial Aid Office, it will be reviewed by the college-designated staff member within the college-designated deadline.

Procedure
If a Professional Judgement appeal is approved:
- The student will receive written notification through JP official notification process.
- Appropriate adjustments will be made to the student's FAFSA® application and transmitted to the U.S. Department of Education.
- The student's electronic file will be documented with the Professional Judgment decision, date of the action, and the person(s) involved in the determination.
- Applicable revisions will be made to students' financial aid offers (use the resulting SAI consistently for all Title IV financial aid offers to that student).

Note:
JP Financial Aid Office presumes that any student who has been approved for an adjustment due to Unusual Circumstances and a final determination of independence has been granted, the dependency status stands in each subsequent award year unless:
- The student informs JP that their circumstances have changed; or

- JP becomes aware of conflicting information about the students' independence.

Note:
If a student's Professional Judgment is approved based on a Unaccompanied Homeless Youth Determination, the student is authorized to use the address of JP as their own on the FAFSA® form.

If a Professional Judgment appeal is pended for additional information (requires additional information/documentation for review):

- The student will receive written notification through JP official notification process.
    - o The student will be responsible for contacting JP Financial Aid Office directly regarding the request for additional information/documentation.
- The student's electronic file will be documented with the Professional Judgment decision, date of the action, and the person(s) involved in the determination.
- If the additional information/documentation is received before JP specified deadline outlined above, it will be added to their previously submitted Professional Judgment appeal. It will be returned to the committee for review.
- If the additional information/documentation is not received before JP specified deadline outlined above, the student's Professional Judgment appeal will be denied.
- If a Professional Judgment appeal is denied:
- The student will receive written notification through JP official notification process.
- Applicable revisions will be made to students' financial aid offers.
- The student's electronic file will be documented with the Professional Judgment decision, date of the action, and the person(s) involved in the determination.

11.10 Notification of PJ Determination

Policy
The Financial Aid Office will notify students of any PJ determination as appropriate for each type of PJ determination made by the FAA.

Procedure
If a Professional Judgement appeal is approved:
The student will receive written notification through JP official notification process.
If a Professional Judgment appeal is tabled (requires additional information/documentation for review):
The student will receive written notification through JP official notification process.
The student will be responsible for contacting JP Financial Aid Office directly regarding the request for additional information/documentation.
If a Professional Judgment appeal is denied:
The student will receive written notification through JP official notification process.

11.11 Systems/Resources Used to Process Professional Judgement(s)

- ctcLink: Navigate to the **ctcLink Sign In** page (https://myaccount.ctclink.us/ or https://gateway.ctclink.us) or the **Activate Your Account** page from your College's website.
- ctcLink Reference Center
- FAFSA® Partner Portal
- How To Make Corrections in FAFSA® Partner Portal

Section 12: Disbursements

12.1 Overview

Financial aid disbursements refer to the process of releasing federal, state and institutional funds to student accounts. In instances where there are credit balances on the student's account, these funds may also be disbursed to the student and, when applicable, to their parents (dependent on the type of funding (not all types of aid are refundable)).

To qualify for financial aid disbursements, it is essential for students to have a completed the Free Application for Federal Student Aid (FAFSA® ®), the Washington Application for State Financial Aid (WASFA), the Washington Grant for Apprenticeship (WG-A) and any institutional funding applications the college may have on file. Students must meet specific eligibility criteria set by federal and state regulations and institutional policies, which can include verification, C-code clearance, and maintaining satisfactory academic progress, among other criteria. It is the student's responsibility to ensure that all eligibility requirements are fulfilled for disbursements to occur.

In certain circumstances, disbursements may be delayed and may not align with the standard disbursement dates established by JP.

It is important to note that the disbursement rules governing FSA apply to various types of financial aid, including the Federal Pell Grant, Teacher Education Assistance for College and Higher Education (TEACH) Grant, Federal Supplemental Educational Opportunity Grant (FSEOG), and Direct Loan Programs. Specific rules associated with Federal Work-Study (FWS) disbursements are also outlined throughout the document. For more information see the Financial Aid Programs Policies & Procedures.

12.2 Direct Loan and TEACH Grant Notification

Policy

JP sends a notification to the student when Direct Loan funds or TEACH Grant-funds are credited to a student's account; 34 CFR 668.165(a); 34 CFR 668.165(b).

When Direct Loan or TEACH Grant funds are credited to a student's account, JP provides written notification (either printed or electronically) to the borrower regarding the following:

- Anticipated date and amount of disbursement.

- Right to cancel all or part of a Direct Loan or TEACH Grant and have the proceeds returned to the U.S. Department of Education.
- Procedures and deadlines for notifying JP about cancellation requests.

This notification requirement does not apply to loan funds provided as part of a post-withdrawal disbursement.

The timing of Direct Loan or TEACH Grant notifications depends on whether JP receives affirmative confirmation from the student regarding their loan preferences or TEACH grant acceptance. Written confirmation of the desired Title IV loans is required before JP credits the student's account with the funds.

Note: Affirmative confirmation is a required process where students actively accept or confirm the specific federal loans or grants offered to them by JP.

A notification is sent,

- If affirmative confirmation is received
    - No earlier than 30 days before and no later than 30 days after crediting the student's account.
- If affirmative confirmation is NOT received
    - No earlier than 30 days before and no later than 7 days after crediting the student's account.

Procedure
Before any disbursement is made, JP notifies the student and their parent (when borrowing Direct PLUS loans) of the amount of funds they can expect to receive from each of these FSA programs, and how and when those funds will be disbursed in writing.

For electronic notifications, follow up on any electronic notice for which you receive an "undeliverable" message is encouraged.

For more information, see the Packaging & Awarding Policies and Procedures.

12.3 Authorizations

Policy
The College is required to obtain authorization from a student (or parent borrower) before performing the below processes 34 CFR 668.165(b):

- Use FSA funds to pay for allowable educationally related charges, including prior year charges, other than tuition, fees, and food and housing (if the student contracts with JP).
- Credit FWS wages to a student's account to pay any educationally related charges 34 CFR 675.16.
- Hold an FSA credit balance.

An authorization document outlines which FSA funds are included by the form, and the authorization period. The authorization period can range from one term to the entire enrollment duration, including multiple academic years. Authorization forms also clearly illustrate how JP will implement the activity.

JP

Multiple authorization items can be combined into one form. Each item is clearly visible, and students or parents are informed that they can refuse to authorize any specific item.

JP does not require students or parents to provide authorization and explain how to cancel or modify an authorization. Borrowers have the right to cancel or modify FSA funds at any time. Cancellations or modifications take effect on the date JP receives them, and they are not retroactive. If a student or parent cancels authorization for FSA funds to cover allowable charges, JP only uses those funds for charges incurred before the cancellation notice was received.

Procedure
Authorizations are made available via ctcLink Student Homepage as an option for students to complete.

<<Insert College Procedures>>

Using Electronic Processes for Notifications and Authorizations
Notices and authorizations can be electronically sent as long as there are no specific regulations requiring U.S. mail. Students may also be directed to a secure website for required notifications and disclosures.

If using an electronic process, the college notifies each student individually every year. Required notices can be sent by U.S. mail, campus mail, or email 34 CFR 668.41(b) & (c).

Annual notifications:
- Outline all required information to be disclosed that year.
- Include the exact internet or intranet address for the information.
- Mention that individuals can request a paper copy, along with instructions on how to do so.

Participation in electronic transactions requires voluntary consent from student loan borrowers for all financial information and notices required for FSA recipients 34 CFR 668.165.

12.4 Right to Cancel

Policy

If a borrower or TEACH Grant recipient wants to cancel all or part of a Direct Loan or TEACH Grant disbursement, they are responsible for notifying JP. It is required to return the loan or grant, cancel it, or do both, as long as JP receives the cancellation request within the time frames specified below:

- If JP receives affirmative confirmation from the student, this will occur either the first day of a payment period or within 14 days after the college informs the student or parent of their right to cancel all or part of a loan or grant, whichever date comes later; or
- If JP does not receive affirmative confirmation from the student, within 30 days after JP informs the student or parent of their right to cancel all or part of a loan or grant.

When JP receives a cancellation request from a student or parent outside the designated period, they can choose to cancel and return the loan or grant. If JP decides not to return a loan disbursement, it tells the borrower to contact their loan servicer.

Procedure
When students submit a request to cancel or return federal aid, JP:

- Documents the student's request
- Cancels/returns funds promptly
- Notifies the student or parent in writing of the outcome of any cancellation request.

12.5 Holding Title IV Credit Balance

(Include if it pertains to your college)
Policy
When JP holds excess student funds, it:

- Identify the funds that JP holds for each student or parent in a subsidiary ledger account specifically designed for that purpose.
- Consistently maintain cash in the depository account equal to the funds held for students or parents; and
- Notwithstanding any authorization obtained by the school, pay any remaining balance on loan funds by the end of the loan period, and any other remaining *Title IV* funds by the end of the last payment period in the award year for which the funds were offered.

If a student or parent cancels authorization to retain excess Title IV funds, JP will return those funds directly to the student or parent no later than 14 calendar days after receiving the cancellation notice.

Procedure
Upon receiving authorization to hold Title IV credit balances, JP will retain the credit balance on the student's account to cover any subsequent charges for a maximum of one academic year. If a credit balance persists at the end of the academic year, it will be disbursed to the student. In cases where the credit originates from Direct Loan or

Parent PLUS Loan funding, the student has the option to submit a form << Insert Specific College Procedure>> to return the funds to the loan lender.

12.6 Institutional Charges

Policy
Institutional charges encompass tuition, fees, food, housing, and other educational costs paid to JP. This includes mandatory fees like registration or technology fees.

All charges for tuition, fees, and food and housing (if contracted with the school) must be considered institutional charges.

Procedure
A charge does not have to appear on a student's account to be considered an institutional charge.

Books and supplies must be considered part of tuition and fees—and therefore institutional charges—if a student does not have a real and reasonable opportunity to purchase them elsewhere. If a school charges for books and supplies as part of its tuition and fees and a student opts out of that method, the school must reduce the student's tuition and fees by the amount associated with the books and supplies.

Charges in enrollment agreements or routinely deducted from a student's account qualify as institutional charges, and they don't have to appear on a student's account to be classified as such.

Noninstitutional Charges in an Enrollment Agreement
If JP includes fees for books, supplies, and equipment (like kits) in a program's enrollment agreement, these are considered institutional charges. However, they can be excluded if the following criteria are met:

- There is no upfront charge for the books, supplies, or equipment listed on the student's account. Signing the enrollment agreement acknowledges the necessity of these items but does not create a financial obligation.
- Students can purchase needed supplies from sources outside of JP.
- JP gets written authorization from students who opt to buy these items from the College 4 CFR 668.165(b). This allows JP to charge student accounts for the kit and use Title IV funds to pay for it.

JP does not use *Title IV* funds to pay overtime charges for a student who fails to complete their academic program within the normal time, even with the student's authorization.

Paying for Institutional Charges
JP can use FSA funds for institutionally provided housing or charges from college-owned bookstores 34 CFR 668.164(c).

In accordance with FSA requirements that apply to housing and the bookstore, JP can:

- Give students the opportunity to opt out of having purchases of books and supplies added to their account 34 CFR 668.164(m)(3).
- Include housing costs as an institutional charge in return calculations when an eligible recipient ends enrollment before the payment period concludes.
- Include bookstore charges as institutional charges for return calculations if students lacked a reasonable opportunity to buy books and supplies elsewhere.
- Include the bookstore in campus crime and safety reports if it is on campus or in any property owned or controlled by the College 34 CFR 668.41(e), 668.46, and 668.49.

Paying for Prior Year Charges

FSA funds generally cover current costs, but can settle prior-year charges up to $200 for:

- Institutional charges without obtaining the student's or parent's authorization; and
- Educational services provided by JP with the student's or parent's authorization 34 CFR 668.164(c)(3), (4), and 34 CFR 668.165(b).

JP does not use current Title IV funds to cover more than $200 in prior-year charges, even with student or parent authorization. This limit applies to the total amount, not per payment period.

12.7 Disbursements by Payment Period

Policy

JP must disburse, during the current payment period, the amount of FSA funds to which the student or their parent is eligible for that period. The disbursement is made in direct relation to the actual cost incurred by the student for that payment period.

Title IV credit balances are not reduced or eliminated by front-loading or allocating institutional charges that cannot be documented for that payment period.

JP may make a prior-year, late, or retroactive disbursement during the current payment period if the student was enrolled and eligible during the payment period covered by that disbursement.

Procedure

Disbursement Eligibility

Confirmation of student eligibility, including satisfactory academic progress and the student has commenced attendance, is required to offer FSA funds. This confirmation includes, but is not limited to, the following:

- For Direct Loans, students need to be enrolled in at least six credits/units (half-time) and have a valid, linked Master Promissory Note (MPN) and entrance counseling.
- Students eligible for a Pell Grant cannot exceed their lifetime limit with scheduled disbursement. For more information, review the Packaging & Awarding Policies and Procedures.

- For TEACH Grant offers, students are required to:
    - o Complete TEACH Grant Initial and Subsequent Counseling.
    - o Sign the Agreement to Serve or Repay; and
    - o Meet GPA requirements.

If a student borrower or parent PLUS loan borrower passes away before any Direct Loan disbursements are made, JP will cancel any pending disbursements. If JP unknowingly disburses funds after a borrower's death, it will return those funds to the U.S. Department of Education.

Title IV funds cannot be disbursed after the borrower's death, except for Federal Work-Study (FWS) funds earned before the death. To receive FWS funds, a student must meet all eligibility criteria, demonstrate financial need on their FAFSA®, and meet Satisfactory Academic Progress (SAP) requirements.

Third-Party Servicers' Responsibility to Confirm Student Eligibility
Third-party servicers will adhere to the same rules as JP. It is required to fulfill their contractual responsibilities in accordance with fiduciary duties under Title IV of the Higher Education Act. If JP engages the servicer for activities supporting Title IV disbursements, the servicer will verify student eligibility 34 CFR 668.25(c)(4), 34 CFR 668.164(b)(3). Examples of these activities include:

- Processing financial aid applications;
- Performing need analysis;
- Verifying students have begun attendance in the classes on which their *Title IV* aid was based;
- Verifying that students are making satisfactory academic progress (SAP);
- Performing verification;
- Determining the type and amount of *Title IV* funds that students are eligible to receive;
- Creating origination, disbursement, or other records in the COD System;
- Requesting funds under the advance, reimbursement, or heightened cash monitoring (HCM) payment methods; or
- Accounting for funds that are originated, requested, or disbursed in reports or data submissions to the U.S. Department of Education.

Leave of Absence Disbursement

- Pell, TEACH Grant, or FSEOG funds can be disbursed to students on a leave of absence (LOA).
- For Federal Work-Study (FWS) funds, students earn compensation only for hours worked before the LOA, which can be disbursed.
- However, Direct Loan funds cannot be disbursed to students on a LOA. Title IV credit balances, which are already disbursed, can be paid to students on an LOA.

12.8 Time Frames for Disbursement

Policy

JP makes disbursements as soon as administratively feasible but no later than three business days after receiving funds from the U.S. Department of Education, 34 CFR 668.164(a). The disbursements may be credited to the student's account or made directly to the student or parent. In order to comply with the excess cash regulations, when requesting funds with which to make FSA disbursements, the College ensures that it does not draw down more cash than it can disburse over the next three business days.

JP disburses funds to students in a timely manner that best meets the students' needs.

Responsibilities in this Policies and Procedures (P&P) manual are institutional and not department specific. Colleges must define local roles and enforce separation of duties in accordance with applicable federal and state regulations and internal control standards to prevent and detect fraud in Title IV and state financial aid programs.

Procedure

Date of Disbursement

JP specifies the date of disbursement, as it affects various regulatory requirements. For example, Title IV credit balances are disbursed to students within 14 days after disbursement or the first day of class, and students are notified of loan disbursements within a related timeframe.

The disbursement date also marks when a student becomes an FSA recipient, along with the associated rights and responsibilities. For instance, when Direct Loan funds are disbursed, the student or parent takes on loan repayment responsibility and has the right to cancel all or part of the loan.

Disbursement Reporting

JP submits records of Direct Loan and Pell and TEACH Grant disbursements to the COD System within 15 days of the disbursement or becoming aware of any necessary adjustments. Title IV funds are considered disbursed when they are credited to a student's account. Failing to submit these records on time may result in rejection of the disbursement, audit, or program review findings, or potential penalties, Federal Register Volume 88, Number 120, June 23, 2023.

Early Disbursements

JP may disburse Title IV funds to an eligible student or parent no more than 10 days before classes begin, provided the student is in a credit-hour program with equal-length terms 34 CFR 668.164(i).

Early disbursement of a Direct Loan cannot occur to a first-year, first-time borrower who is subject to the 30-day delayed disbursement requirements in 34 CFR 685.303(b)(5). A first-time borrower is someone who has not previously received a Direct Subsidized or Direct Unsubsidized Loan made under the Direct Loan Program, or a Subsidized Federal Stafford Loan, Unsubsidized Federal Stafford Loan, or Federal Supplemental Loan for Students made under the Federal Family Education Loan Program. This restriction does not apply if the college is exempt due to low cohort default rates under 34 CFR 685.303(b)(5)(i)(A), or (B).

This exemption applies if JP cohort default rates for the three most recent fiscal years for which data are available are less than 15 percent, 34 CFR 668.164(i)(2). In addition, JP may not compensate a student employed under the FWS program until the student earns that compensation by performing work, as provided in 34 CFR 675.16(a)(5).

Retroactive Payments
If JP did not disburse funds for completed payment periods, it can make retroactive payments for those periods within the current award year. JP can make these retroactive disbursements in a single lump sum, 34 CFR 668.164(k).

For Pell Grants or TEACH Grants, the payment matches the student's enrollment status at the end of that payment period. Completed coursework, including earned “F” grades and incompletes that have not yet converted to "F", counts toward this status 34 CFR 690.76(b).

Late Disbursements
A student or parent becomes ineligible for Federal Student Aid (FSA) funds when:

- For Direct Loans, the student is no longer enrolled as a half-time student for the intended enrollment period.
- For FSA grants, the student is no longer enrolled for the award year.

However, per 34 CFR 668.164(j), students may still qualify for "late disbursements" even after becoming ineligible if:

- An ISIR with an official Student Aid Index (SAI) for the relevant award year is processed by the date established by the U.S. Department of Education in the annual deadline date notice; and
- For a loan made under the Direct Loan program or for an offer made under the TEACH Grant program, the institution originated the loan or offer; or
- For an offer under the Federal Perkins Loan or FSEOG programs, the institution made that offer to the student.

The origination date of a Direct Loan is when JP creates the electronic loan record in its system, which may differ from when it transmits the record to the COD System or when the U.S. Department of Education approves it.

JP does not originate a Direct Loan for a period if the student is not enrolled in at least six credits/units (half-time), even if they remain registered in some capacity.

Late disbursements occur within 180 days after JP determines whether a student has withdrawn or has become ineligible.

Processed Date

To determine eligibility for a late disbursement, refer to the processing date on the FAFSA® Submission Summary or ISIR. On the ISIR, check the "Processed Date" field. For the FAFSA® Submission Summary, look at the date above the Document Reference Number (DRN) on the first page.

Sometimes, JP may receive a FAFSA® Submission Summary or ISIR showing an official Student Aid Index (SAI) processed while the student was enrolled, but before they listed JP on the FAFSA®. If JP later receives a document with a processed date after the student lost eligibility, they obtain the earlier FAFSA® Submission Summary or ISIR to confirm eligibility for the late disbursement.

Date of Origination
The regulations define the loan origination date as the day JP creates the electronic loan origination record. If JP documents this record creation before a student becomes ineligible, it fulfills the origination date requirement for late disbursement of Direct Loans, as long as all other requirements are met 34 CFR 685.301(a)(6).

Late Disbursement Limitations
JP cannot make late disbursements under certain conditions, including:
- Late second disbursements unless the student completes the loan period.
- Late disbursements to first-year borrowers who withdraw before the 30th day, without a waiver.
- Late first disbursements if the student has withdrawn and isn't enrolled in at least six credits/units (half-time enrollment intensity).
- Late disbursements without a valid FAFSA® by the deadline.
- The student **never began attendance** in any courses.
- Verification was not completed in time (unless specific post-withdrawal conditions are met).
- For loans, the **MPN was not signed,** or loan origination did not occur before the student became ineligible.

Example
No Attendance: A student completes the FAFSA® but never begins attendance in any courses. No late disbursement can be made because the student did not establish eligibility through attendance.

No late disbursement is allowed more than 180 days after a student becomes ineligible, 34 CFR 668.164(j)(4).

Mandatory Versus Optional Late Disbursements
JP **must** make a late disbursement when the student met all eligibility requirements before they stopped attending and the aid could have been disbursed.

Applies to:
- **Federal Pell Grant**
- In some cases, **FSEOG** (if awarded prior to withdrawal)

For grants, **no additional student confirmation is required** to credit institutional charges.

Mandatory Late Disbursement Example

- **Pell Grant:** A student withdraws in week 5, but their FAFSA® was processed and eligibility confirmed before withdrawal. The school must disburse the Pell funds earned from the R2T4 calculation.

JP **may**, but is **not required to**, make a late disbursement when the student met all eligibility requirements before they stopped attending and the aid could have been disbursed.

Applies to:

- **Direct Loans** (Subsidized/Unsubsidized/PLUS)
- Grant funds when institutional awarding had not yet occurred

In addition,

- JP must obtain **borrower confirmation** before disbursing.
- Students (or parents for PLUS) must be notified of:
  - The loan amount
  - Their right to cancel or reduce the loan
- Funds cannot be credited without affirmative acceptance.

Optional Late Disbursement Example

- **Direct Loan:** A student withdraws after completing 40% of the term but had accepted loans that had not yet disbursed. The school may offer the late disbursement but must obtain borrower confirmation before releasing funds.

JP makes an offer of late disbursement when:

- A student who qualifies for a late disbursement completes or withdraws during the payment period or period of enrollment.
- A student completes their payment or enrollment period.
- A student is eligible for a post-withdrawal disbursement.

A post-withdrawal disbursement is a late payment owed to a student who withdraws during the payment or enrollment period, based on the return of Title IV funds. JP makes these disbursements as required by 34 CFR 668.22, 34 CFR 668.22(a)(5).

If a student did not withdraw but is no longer enrolled at least half-time, JP has the option to make a late disbursement of a Direct Loan, provided the student began attendance and was enrolled at least half-time. There's no need to reconfirm attendance before the disbursement.

Late Disbursement Payment

JP can credit a student's account with a late disbursement of Federal Student Aid (FSA) funds without the student's permission for current tuition, fees, food, and housing. This includes up to $200 for prior year charges. JP will confirm prior authorization from the student or parent, as required by [34 CFR 668.165(b)], before the student loses eligibility. If any funds remain after covering the outstanding charges, JP will pay the student directly within 14 days.

For students who are no longer enrolled at least half-time, JP will determine the amount of a late Direct Loan disbursement based on the educational costs incurred during their time enrolled at least half-time.

Student Communication
Disbursing Title IV Funds | 2025-2026 Federal Student Aid Handbook

To reduce communication attempts with students, JP may use one contact to:
- Counsel borrowers about their loan repayment obligations;
- Obtain permission to credit loan funds to the student's account to cover unpaid institutional charges;
- Obtain permission to make a late disbursement of grant or loan funds for other than institutional charges (if not previously obtained);
- Obtain permission to make a late disbursement of grant or loan funds directly to students; and
- Confirm that students wish the school to receive, as a direct disbursement, any grant or loan funds the students are due as a late disbursement.

A student's response to late disbursement offers does not need to be in writing, but JP must document it.

Processing Extension
Extended or post-deadline processing allows JP to adjust submissions after the closeout deadline. JP can request an extension for Direct Loans or grants via the post-deadline processing request page in the COD System but does not need to for downward disbursement adjustments for Pell Grants.

Authorized users can log in to the COD System, select "School" then "Request Post-Deadline/Extended Processing," and complete the necessary steps: choose the award year and program, select a reason from the dropdown, provide an explanation, and submit.

Disbursement Correction
If JP has mistakenly returned funds or failed to withdraw all the funds a student was entitled to, redistributing Title IV funds to correct this issue is still classified as a disbursement under 34 CFR 668.164(a). Consequently, any corrective disbursements adhere to cash management rules, including late disbursement conditions. If JP identifies a disbursement error after a student has lost eligibility, any corrective actions are to be completed within the 180-day deadline for late disbursements.

12.9 Federal Work-Study Wage Disbursement

Policy

JP pays federal work-study wages in accordance with the College's similar payroll. Both federal and nonfederal shares are paid at the same time, 34 CFR 675.16.

For audits, JP maintains documentation (such as canceled checks and bank statements) to confirm that students received the correct disbursements charged to the FWS Program.

Procedure

FWS wages are earned through work performed by the student. Payments can be made for work done before the last day of attendance, but FWS funds cannot be used for work after a student withdraws and does not plan to return.

Correspondence students are required to submit their first completed lesson before receiving FWS disbursements 34 CFR 675.16(b).

Definition: Correspondence vs Distance Education Student

A **correspondence student** is enrolled in a program where instruction is primarily self-paced and interaction with the instructor is **limited and not regular or substantive**.

A **distance education student** is enrolled in courses delivered through technology where there is **regular and substantive interaction (RSI)** between the instructor and students.

Noncash Contributions

JP fulfills its share of a student's FWS wages through noncash contributions, such as tuition, fees, food, housing, or books. However, they cannot include forgiven fines, such as parking or library fees, as part of this contribution.

Noncash payments are made before the student's final payroll period. If JP prepays for future terms, it will provide the student with a statement of the noncash contribution amount before the final payroll period ends.

Crossover Payment Periods

When a payment period spans two award years (starting before July 1 and ending on or after July 1), the student receives FWS funds from the first award year for compensation earned through June 30 and from the following award year for compensation earned from July 1 onward.

12.10 Method of Disbursement

Policy

JP disburses FSA funds by crediting the student's account for allowable charges at the institution 34 CFR 668.164(c).

Procedure
<u>Credit to Student's Account</u>
When disbursing FSA funds to a student's account, JP can only do so for allowable charges associated with the current payment period (except for the allowances for prior year, late, or retroactive disbursements) 34 CFR 668.164(c).

Allowable charges include the following:
- Current charges incurred by the student at JP for tuition, fees, food, and housing if the student contracts with JP (third-party or passthrough charges are not included except in the case of third-party housing, books, and supplies contracted by JP);
- The prorated amount of those charges if JP debits the student's ledger account for more than the charges associated with the payment period;
- Books, supplies, and other educationally related goods and services provided by JP if the student's or parent's (as applicable) written authorization is obtained; and
- Prior-year charges not exceeding $200

12.11 Title IV Credit Balances
Policy
JP pays the credit balance directly to the student or parent as soon as possible, but no later than 14 days after:
- The first day of class of a payment period if the credit balance occurred on or before that day, or
- The balance occurred if that was after the first day of class.

34 CFR 668.164(h)(1), 34 CFR 668.164(h)(2), 34 CFR 668.165(b)(5)(iii).

The law requires any excess PLUS Loan funds to be returned to the parent. If these funds create a credit balance, the parent will receive it. However, the parent can authorize JP to transfer this balance directly to the student's account via their online application.

The U.S. Department of Education does not specify which Title IV funds contribute to a credit balance.

JP does not require students to take action to receive their credit balance and disburse any Title IV credit balance within the 14-day regulatory timeframe.
JP is not required to pay credit balances of less than $1.00.

JP must cease all attempts to disburse the funds and ensure that all unclaimed credit balance funds are returned (through G5) ***no later than 240 days*** after the date it issued the check. All unclaimed credit balances must be returned (through G5) - there is no **de minimis** amount.

JP

Procedure

Releasing Title IV Credit Balances

Check

Title IV credit balances are disbursed to students within 14 days. JP can issue a check that requires the student's or parent's endorsement, which is considered issued when mailed or available for pickup 34 CFR 668.164(d)(1)(i)(B) & (ii)(B).

Once the student is notified, they are able to receive the funds immediately. JP can hold the check for up to 21 days; if not picked up, they will mail the check, initiate an EFT, or return the funds to the federal program.

Electronic Fund Transfer (EFT)

Credit balances can be released by initiating an electronic funds transfer (EFT) to a bank account designated by the student or their parent. JP has the option of creating a policy requiring students to provide information about an existing bank account or open an account at a bank of the student's choosing, as long as this policy does not delay the disbursement of FSA funds to students 34 CFR 668.164(d)(1)(i)(A) & (ii) (A).

If a student does not comply, JP will still disburse the funds via check, ensuring the credit balance is paid within the required time frame.

Books & Supplies Provision

Disbursing Title IV Funds | 2025-2026 Federal Student Aid Handbook

- By the seventh day of a payment period, JP must provide a way for a student who is eligible (see below*) for *Title IV* funds to obtain or purchase the books and supplies required for the payment period if: JP **could** have disbursed FSA funds ten days before the payment period begins, and
- The disbursement of those funds **would** have created a Title IV credit balance.

*An eligible student is one who:

- Meets all Title IV student eligibility requirements, including having a valid FAFSA® and being admitted into an eligible program.
- Has financial aid awarded that exceeds institutional charges, resulting in an actual or expected credit balance.
- Is enrolled and attending classes for the payment period.
- Has completed any required verification (if selected), unless the school is permitted to make an interim disbursement.

JP will provide JP. The amount provided should be the lesser of the presumed credit balance or the determined need for books and supplies, using either actual costs or the estimated cost of attendance for those items 34 CFR 668.164(m).

Students may decline to participate in this process. If they use the method provided by JP, they are considered to have authorized FSA fund use without needing written consent.

<< Insert College Procedures>>

To receive disbursements, students are required to meet all eligibility criteria before the payment period begins. Those with unresolved issues, such as incomplete verification or conflicting information, are not eligible.

If a bank-issued stored-value or prepaid debit card is used to deliver funds for books and supplies, and a federally insured bank account supports the card, a student can access the funds via the card by the seventh day of their payment period. JP is not liable for delays caused by identity verification issues.

JP is prohibited from charging fees for delivering FSA funds but may charge for replacing cards. Additionally, JP includes clear information in financial aid communications about how eligible students can access funds for books and supplies and whether charges will be placed on their accounts or paid directly to them.

12.12 Returning Unclaimed Title IV Credit Balances

Policy

Title IV funds, except Federal Work-Study (FWS) funds, are returned to the U.S. Department of Education if a student or parent does not receive them after attempts to disburse them. For FWS, only the federal portion of payroll disbursements needs to be returned.

Procedure

If an electronic funds transfer (EFT) or check is rejected or returned, JP will attempt to disburse the funds again within 45 days. If no further attempts are made, the funds are returned to the U.S. Department of Education within these 45 days.

JP must cease all attempts to disburse the funds and ensure that all unclaimed credit balance funds are returned (through G5) ***no later than 240 days*** after the date it issued the check. All unclaimed credit balances must be returned (through G5) - there is no **de minimis** amount.

JP will return the *Title IV* funds in the same order they would use if they had to return funds because the student withdrew before the 60% point in the payment period or period of enrollment.

Direct Loans—JP will complete two separate procedures:

1. Return the funds through G5.
2. The return must be offset by a downward adjustment in the student's Direct Loan record in the COD System.

When JP reduces the student's Direct Loan actual disbursement amounts in the COD System, the information is transmitted to the student's loan servicer and results in a reduction of the outstanding principal balance on the student's loan.

Pell Grants and TEACH Grants—JP will complete the following procedures:

1. Return the funds through G5.
2. The return must be offset by a downward adjustment in the student's Pell or TEACH Grant offer in the COD System.

Federal Supplemental Educational Opportunity Grants—If the award year has not changed, JP will immediately offer the funds to another eligible student. If the award year has changed **and** JP has not already carried forward the maximum 10% allowable, JP will carry the funds forward to the current year and offer them to another eligible student.
JP will amend Part IV, Sections B-E, and Part VI of the FISAP to reflect the amount being carried forward.
If the FSEOG funds cannot be carried forward to the next award year, JP will return them to the correct award year through G5 and amend Part IV, Sections C-E, and Part VI of the FISAP.

12.13 Holding Title IV Credit Balances

Policy
Title IV credit balances can be held for the current academic year with the student's (or parent's, in the case of PLUS loans) voluntary authorization. JP records these amounts in a designated ledger and maintains cash equal to the amount held for students. The College retains any interest earned on these funds.

JP

Procedure
FSA funds are meant to cover current charges, so JP pays:

- Any remaining balance on FSA loan funds by the end of the loan period.
- Any other remaining FSA program funds by the end of the last payment period for the award year.

JP makes a reasonable effort to locate the student if JP has lost contact with a student due to a Title IV credit balance. If unsuccessful, the credit balance is returned to the appropriate FSA program(s). FSA funds for loan programs are returned first to reduce the borrower's debt.

Before releasing a Title IV credit balance, JP asks the student whether they want any of the funds returned to their Direct Loans. This is acceptable if the student is informed of the total credit balance and provided with written instructions for the amount to return. If the response is not timely, the full credit balance is still disbursed within the designated timeframes.

All elements of an authorization to hold a Title IV credit balance are clear and include the following:

- A description of the covered FSA funds and the valid time period.
- Information necessary for the student or parent to make an informed decision.
- Notification that the student or parent can refuse or cancel authorization at any time, and that cancellations are not retroactive.

- Enough details to clarify how the credit balance will be used.

Third Party Servicers TIV Credit Balance Disbursement By EFT
JP contracts with a servicer to provide debit or prepaid cards for Title IV credit balances and to ensure compliance with regulations, allowing students to access these balances within 14 days and to FWS wages at least once a month.

U.S. Department of Education Notification of Third-Party Servicers
JP notifies the U.S. Department of Education of all contracts with third-party servicers that manage Title IV credit balance accounts.

JP updates Section J of the E-App within 10 business days for any of the following changes:
- Entering into a contract with a new third-party servicer.
- Significantly modifying an existing servicer contract.
- Terminating a contract with a servicer.
- A servicer ceasing to provide services, going out of business, or filing for bankruptcy.

Notifications include the servicer's name, address, and details of the change. A copy of the contract is only needed if the U.S. Department of Education requests it; it is not required for recertification.

<<Insert College Procedures>>

12.14 Tier 1 Arrangements

The Credit Card Accountability Responsibility and Disclosure Act of 2009 (CARD Act) introduced protections for college students against certain credit card marketing practices. It restricted credit card marketing on campuses, enforced transparency, banned "free" gifts for account sign-ups, and required individuals under 21 to demonstrate their ability to pay or have a cosigner.

Policy
A T1 arrangement occurs when JP hires a third-party servicer to manage direct payments of Title IV funds 34 CFR 668.164(e). Payments are made to:
- Financial accounts offered to students under the contract.
- Accounts where information is communicated to students by the third-party servicer or JP.
- Accounts where information is shared by an entity affiliated with the third-party servicer.

Procedure
Privacy & Security in T1 Accounts
JP ensures students actively consent to participate in any account offered. JP informs students of the terms and conditions before obtaining consent and sending any access

devices, such as student ID cards, which require validation only after consent is obtained.

Before students choose how to receive direct payments, JP does not disclose any personally identifiable information (PII) with third-party servicers or financial institutions, except for directory information as defined in the Family Educational Rights and Privacy Act (FERPA).

Colleges, servicers, and financial institutions share the responsibility of using PII only for direct payments to students and not for marketing or other purposes, and they do not share this information with other entities except for payments under Title IV, HEA programs.

Students & T1 Accounts

JP ensures that students participating in T1 arrangements can access their funds through a surcharge-free ATM network. Students do not incur costs for:

- Opening the account or receiving an access device
- Balance inquiries or withdrawals at surcharge-free ATMs
- Point-of-sale transactions assessed by the institution or associated servicer

Other T1 Requirements

JP offering T1 accounts ensures:

- Financial accounts and access devices are not marketed as credit cards.
- No credit is allowed, and students cannot be charged fees for transactions or withdrawals that exceed their account balance, except for inadvertently authorized overdrafts, which incur no fees.
- Students have convenient access to Title IV, HEA program funds via domestic withdrawals and transfers without charges throughout their enrollment, after credit balance funds are deposited.
- All T1 requirements are met.
- A webpage is provided with the terms and conditions of the contract.
- Account terms are in the best financial interest of the students.

Note: The U.S Department of Education considers the requirement met when:

- JP conducts independent reviews every two years to ensure fees are consistent with or below market rates, considering evidence such as consumer complaints and regulatory findings.
- Contracts for T1 arrangements allow JP to terminate based on student complaints or if fees exceed prevailing market rates.

T1 requirements cease when a student is no longer enrolled, and there are no pending Title IV disbursements. JP can still share enrollment status information with the servicer for regulatory compliance.

12.14.1 Federal Participation in the ACH for Tier 1 Arrangements

When T1 accounts are opened for students through Automated Clearing House (ACH) credit of Title IV funds, they are established in the student's name at a financial institution.

All Title IV funds deposited into accounts accessed via prepaid cards are required to:

- Be held at a financial institution.
- Meet pass-through deposit or share insurance requirements, ensuring the Federal Deposit Insurance Corporation (FDIC) or the National Credit Union Share Insurance Fund (NCUSIF) coverage for the funds.
- Not be linked to a line of credit or loan agreement that triggers repayment upon receiving the payments.

The financial institution provides consumer protection and complies with the requirements of the Electronic Fund Transfer Act.

12.14.2 Non T1 Arrangements

Circumstances not subject to T1 regulations include:

- General marketing by a financial institution that doesn't specify account types or opening methods (not direct marketing as outlined in 34 CFR 668.164(f)(3).
- Sponsoring on-campus facilities with branding that doesn't promote specific accounts.
- A lease permitting the operation of an on-campus branch or on-campus ATMs
- Providing a general list of area financial institutions to students, not as part of a contract.
- Allowing students to access Title IV credit balances via school-issued stored-value cards without third-party involvement.

12.15 Systems Resources Used for Disbursements

- ctcLink, https://myaccount.ctclink.us/
- Common Origination and Disbursement (COD)

Section 13: Return to Title IV (R2T4)

13.1 Overview and General Requirements

HEA, Section 484B
34 CFR 668.22

Title IV funds are offered to a student under the expectation that the student will attend school for the entire period for which the funds were offered. When a student completely withdraws, they may no longer be eligible for the full amount of Title IV funds they were originally offered.

A student who withdraws from some, but not all classes that are applicable to their Title IV-eligible program of study is generally not subject to the Return to Title IV (R2T4) requirements. For example, a student initially enrolled in four classes for a term and subsequently, after two weeks, withdraws from one of the classes but continues to be enrolled in all other classes. In this situation, the R2T4 requirements do not apply because the student remained enrolled in three classes.

The requirements for treating Title IV funds when a student withdraws apply to any recipient of a Title IV grant or Direct loan funds who ceases attendance. All students receiving federal financial aid who completely withdraw, *officially or unofficially*, are subject to Return of Title IV (R2T4) requirements. Any federal financial aid recipient who withdraws within the first 60% of the term (measured in calendar days) owes a portion of financial aid (excluding Federal Work-Study funds) back to the federal government and a portion back to the institution. Washington State financial aid (excluding State Work Student Funds) may be owed back as well, depending on the institution's state aid repayment policy. The institution may also owe a portion of the refund of institutional costs.

The institution must first determine whether a student was eligible to receive any Title IV funds when determining whether the R2T4 requirements apply. The R2T4 requirements apply only to the receipt of or eligibility for Title IV aid that can be included in the calculation, except for Federal Work-Study (FWS) funds. The R2T4 requirements do not apply to a student if the only Title IV aid that the student has received or could have received was FWS funds.

Because a student begins earning both Title IV and Washington State funds on the first day of attendance, even if the student withdraws before the census date, an R2T4 calculation is required using the number of days the student attended. In addition, all forms of Title IV aid (except for FWS funds) that were disbursed or that could have been disbursed must be included in the R2T4 calculation, even if the student receives a full tuition refund. This state repayment calculation will depend on the institution’s state aid repayment policy JP.

13.1.1 Key Concepts:

- Withdrawal: The institution must apply the R2T4 requirements when certain students cease attendance (Officially or Unofficially) in all classes on which their Title IV aid was based during a payment period or period of enrollment.

  <<Insert College Withdraw Requirements>>

  Title IV Recipient: A Title IV recipient is a student who has received a Title IV grant or Direct loan funds or who meets the requirements to receive a late disbursement. The R2T4 requirements do not apply to all students who withdraw from their classes. Instead, JP must apply the requirements only to withdrawn students who are Title IV recipients. (Requirements for late disbursement can be found in the Disbursement section of the P&P).

  Note: If the student never actually began attendance for the payment period or period of enrollment, R2T4 does not apply. Likewise, if a student began attendance but was not and could not have been disbursed Title IV grant or loan funds prior to withdrawal, the student is not considered to have been a Title IV recipient, and requirements for R2T4 do not apply.

- Washington State Aid Recipient: A Washington State Aid recipient is a student who has received Washington State funds or who meets the requirements to receive a late disbursement. The Washington State Aid rules closely follow federal Title IV regulations, with some modifications allowed. Therefore, it's important for each institution to have their own state aid repayment policy updated.

- Title IV Aid: The following Title IV aid programs are subject to the R2T4 requirements (FWS is not subject to the R2T4 requirements) 34 CFR 668.22(a)(3)
  - o Federal Pell Grant
  - o TEACH Grant
  - o Federal Supplemental Educational Opportunity Grant (FSEOG), and
  - o Federal Direct Loans

- Earned Aid: A withdrawn student's earned aid is the amount of Title IV aid to which the student is entitled, based upon the percentage of the payment period or period of enrollment completed as of the date of withdrawal. A student's earned aid may be either disbursed or undisbursed at the time of withdrawal.

- Unearned Aid: If the amount of earned Title IV aid is less than the amount disbursed as of the date of withdrawal, the difference is the amount of unearned aid that must be returned to the Title IV programs by the institution, by the student, or both.

- Institutional Charges: For the purposes of R2T4, institutional charges are the charges **initially assessed** for Title IV eligible coursework to the student for the payment period or period of enrollment. Institutional charges typically include tuition, fees, housing, and food (if contracted with the institution), and other educational expenses that are paid directly to JP. DCL GEN-00-24; 34 CFR 668.22(g)(1)(ii)(2); 34 CFR 668.22(g)(2)

- Post-Withdrawal Disbursement (PWD): If the amount of Title IV funds earned by a student is more than the amount disbursed as of the date of withdrawal, the institution must disburse, or offer to disburse, the difference in a post-withdrawal disbursement. 34 CFR 668.22(a)(6)

13.1.2 The R2T4 Formula:
The Title IV regulations provide a specific formula to determine the amount of Title IV funds the Title IV recipient has earned when they have withdrawn from the institution. The amount earned is calculated based on the percentage of the payment period or period of enrollment the student had completed at the time of withdrawal.

13.1.3 The R2T4 Process:
The steps outlined below summarize the overall R2T4 process:

Step 1: Determine if the student is considered to have withdrawn from the payment period or period of enrollment.
Step 2: Determine the student's Title IV aid information (aid disbursed and aid that could have been disbursed)
Step 3: Determine the student's withdrawal date.
Step 4: Determine the percentage of earned aid.
Step 5: Determine the amount of earned aid.
Step 6: Determine the amount of unearned aid.
Step 7: Determine the school and student shares of unearned aid.

R2T4 Timelines

NOTE: Notify the student of the return of unearned aid

Number of Days from the Date of Determination		
14 Days	30 Days	45 Days

For schools required to take attendance:	For schools not required to take attendance:	School:
● Determine the student unofficially withdrew within 14 calendar days after the last date of attendance (LDA)	● Determine the student unofficially withdrew by the earlier of: o End of the payment period or period of enrollment o End of the academic year, or o End of the student's educational program All schools: ● Perform the R2T4 calculation ● Notify the student of a grant overpayment	● Return institutional share of unearned grant funds to the Title IV programs as soon as possible, but no later than 45 days after the date of determination of the student's withdrawal. *Student:* ● Repay any overpayment within 45 days from the date the college notified the student of the overpayment.

Step 8: Make post-withdrawal disbursement (if any).

The JP is the point of contact for withdrawing from the College. Official withdrawal procedures can be found in JP catalog JP.

- JP refund policy dictates that fees will be refunded in full for coursework dropped on or before the *Last Day to Drop Classes*, or for coursework canceled by JP.
    - The JP process is separate from the R2T4 calculation. Students may appeal charges through this process if they meet specific criteria (For non-R2T4-related change appeals; students may consult the Drop with Refund Petition; R2T4 processes remain governed by federal guidelines).
- In all cases, the federal repayment policy supersedes JPrefund policy for students receiving federal financial aid and completely withdrawing from JP.
- These policies are outlined in the JP.
- Students are notified by JP
  of the required deadlines, such as the deadline to withdraw and the withdrawal process.

Tuition refunds following a student's withdrawal have no impact on the amount of Title IV aid that the student has earned under a R2T4 calculation. For example, if a student withdraws during a term and JP provides a full tuition refund (i.e., medical reasons), JP may not return more Title IV aid than the R2T4 calculation specifies unless JP gets the student's permission to do so; this includes Direct Loans as well.

If a student drops classes or is administratively dropped/withdrawn by JP on the same day the student withdraws, or if JP granted a retroactive withdrawal for a student, the enrollment status/intensity and charges are not adjusted to reflect the dropped classes for R2T4 purposes. Even if a student paid all institutional charges and ceased enrollment prior to Title IV funds being disbursed, if they could have been disbursed, JP must determine the Title IV funds earned by the student and follow the procedures relating to PWD.

R2T4 Processing Business Process Guide

13.2 Determining Withdrawal Date

Policy

The Financial Aid Office uses the last date of enrollment as recorded by JPdesignated staff member for students who initiate the official withdrawal process or notify the College in writing their intent to withdraw. Students who did not officially withdraw or notify JP of the intent to withdraw, the Financial Aid Office uses the last date of academically related activity, as reported by instructors, or the midpoint (50%) of the quarter. This date determines how much, if any, a student must repay.

Definitions:

- Official Withdrawal: Students contact JP and request to withdraw from all of their classes or drop classes online.
- Unofficial Withdrawal:
    - Students who ceased attending classes and did not begin the official withdrawal process or provide notification of their intent to withdraw. Students who did not officially withdraw and instructors did not report any last day of attendance will be assumed to have completed 50% of the quarter.
    - Students who did not officially withdraw and earned zero credits/units will be assumed to have unofficially withdrawn. If none of the student's estimated LDAs exceed the 60% timeframe for the quarter, the midpoint of the quarter will be used as LDA.
- Census Date: Is a snapshot of the student's enrollment for the term (quarter), which means the credits/units are locked and aid for the quarter is adjusted to reflect the enrolled credits/units

<<Example, Insert College Definition>>

The following are examples of academically related activity, also known as academic attendance:

- Attending a synchronous class, recitation, lecture, field activity, or laboratory activity, either physically or online, where there is an opportunity for direct interaction between the instructor and students;
- Submitting an academic assignment;

- Taking an exam or assessment;
- Participating in an interactive tutorial, webinar, or other interactive computer-assisted instruction;
- Participating in a school-assigned study group, online discussion, or group project; or
- Interacting with a faculty member regarding the academic subject studied in the course.

Procedure

- Reports of students who withdrew/ceased attendance are generated weekly.
- The Financial Aid Office will complete an R2T4 calculation to determine the amount of federal financial aid the student earned.
- The Financial Aid Office will return funds to the federal programs, in the order according to federal regulations, on the student's behalf, and the return will be reflected as a charge on the student's account.
- The Financial Aid Office will send a letter or email letter notification to the student's college e-mail address indicating the outcome of the R2T4 calculation, including additional information regarding repayment. (if required)
- The student is responsible for any and all College charges resulting from an R2T4 calculation.

<<Insert College Procedures>>

13.2.1 R2T4 Withdrawal Exemptions:

Under the September 2, 2020, final regulations, the U.S. Department of Education established withdrawal exemption criteria that, if met, allow a student who has withdrawn or otherwise ceased attendance NOT to be considered a withdrawn student for Title IV purposes, meaning no R2T4 calculation is required for that student.

The final regulations also include the revision to the definition of a program "offered in modules" for Title IV purposes to only include a program that uses a *standard term or nonstandard-term academic calendar, is not a subscription-based program, and has a course or courses in the program that do not span the entire length of the payment period or period of enrollment* (34 CFR 668.22(l)(6)).

The withdrawal exemptions apply to both undergraduate and graduate students. A student only needs to meet one of the criteria to qualify for the exemption. The withdrawal exemptions are only used to determine if the student meets one of the withdrawal exemptions.

The withdrawal exemption categories are as follows:

1. Successful completion of all requirements for graduation
   Students who successfully complete (*i.e., earn a passing grade*) all requirements for graduation from his or her program before completing the days or hours in the period the student was scheduled to complete are exempt from the R2T4 requirement.

- Aid recalculation rules apply
- This applies to all programs (with or without modules), including clock-hour programs.

2. Programs offered in modules
   In standard-term and nonstandard-term programs offered in modules, it's not considered a withdrawal if a student successfully completes (*i.e., earns a passing grade*) Title IV eligible coursework:
   1. Equal to or greater than coursework required for JP definition of a half-time student for the period [34 CFR 668.2(b)](#)
   2. Half-time enrollment is at least half the workload of the applicable minimum requirements outlined in the definition for a full-time student

   In a program offered in modules, a student is not considered to have withdrawn if the student successfully completes *(i.e., earns a passing grade)* the following*:*
   1. One module that includes 49% or more of the number of days in the payment period, excluding scheduled breaks of five or more consecutive days and all days between modules, or
   2. A combination of modules that, when combined, contain 49% or more of the number of days in the payment period, excluding scheduled breaks of five or more consecutive days and all days between modules. The 49% figure may NOT be rounded up (i.e., 48.7% cannot be rounded up to 49%). The 49% figure is based on the number of days in the overall payment period, not 49% of the modules the student was enrolled in for a particular payment period.

3. Written Confirmation
   Students who provide written confirmation to the Financial Aid Office at the time of ceasing attendance in a part of the term that they plan to attend another course later in the same payment period are not considered to have withdrawn from the term.
   - Note: Written confirmation of a later class is required; registration alone does not meet this requirement. If the student does not provide written confirmation of plans to return to JP later in the same payment period or term, JP considers the student to have withdrawn and begins the R2T4 process.
   - However, if the student does return to JP in the same term, even if they did not provide written confirmation of plans to do so, the student is not considered to have withdrawn and is eligible to receive the Title IV funds for which the student was eligible before ceasing attendance.

Final Rules published in the January 3, 2025, Federal Register provide for an optional exemption in which the college would not need to perform an R2T4 calculation if certain conditions are met, *as outlined below. This regulation is effective July 1, 2026, but the college has the option for early implementation beginning February 3, 2025* ***(SBCTC Colleges did not early implement this option)****. If the college chooses not to implement the optional withdrawal exemption, students who received a Direct Loan but* *did not begin attendance will be able to repay their loans under the terms of their Master Promissory Note (MPN) rather than the previous practice of receiving a demand letter for the full payment.*

- *The student is treated as never having begun attendance for the payment period or period of enrollment;*
- *The school returns all Title IV grant and loan funds disbursed to the student or parent (including any credit balances delivered to the student or parent) for the payment period or period of enrollment;*
- *The school refunds all institutional charges to the student for the payment period or period of enrollment; and*
- *The school writes off or cancels any payment period or period of enrollment balance owed by the student to the school due to the school's return of Title IV funds.*

13.2.2 Student Never Establishes Eligibility for Title IV Aid

The R2T4 requirements do not apply to a student who never establishes Title IV eligibility for the following situations:

- There is no FAFSA® Submission Summary (FSS) or Institutional Student Information Record (ISIR) processed by the Federal Processing System (FPS);
- The student never attends any classes;
- The institution cannot document the student's attendance in at least one class;
- The student is not eligible for federal financial aid.

Any Title IV aid disbursed based on anticipated enrollment must be returned to the applicable Title IV programs.

13.3 Return of Title IV Funds and Deceased Students

If a student who is a Title IV aid recipient subsequently dies before completing the payment period or period of enrollment, JP must perform the R2T4 calculation and return any funds for which the institution is responsible. The student's estate is not responsible for returning any Title IV funds. JP cannot make a post-withdrawal disbursement to a deceased student's estate.

13.4 Calculating Earned/Unearned Title IV Aid

Policy

The U. S. Department of Education requires that JP determine the amount of Federal Title IV aid earned by a student who withdraws or fails to complete the period of enrollment. JP must determine the earned and unearned portions of Title IV aid as of the date the student ceased attendance based on the amount of time the student spent in attendance. Up through the 60% point in the period of enrollment, a pro rata schedule is used to determine the amount of Title IV funds the student has earned at the time of withdrawal.

After the 60% point in the period of enrollment, a student has earned 100% of the Title

IV funds he or she was scheduled to receive. For a student who withdraws after the 60% point-in-time, there are no unearned funds. Any required repayment is allocated back to the Title IV programs in the order specified by law.

- A student must repay the portion of the original grant overpayment that is in excess of half of the total Title IV grant funds that he or she received or could have received. The student does not have to repay grant overpayments of $50 or less per program. 34 CFR 668.22(h)(3)(ii)
- Any repayment of Title IV loans is to be repaid under the conditions of the existing promissory note.
- A student who owes a grant repayment remains ineligible for further Title IV assistance until the grant is repaid, unless the student and the U.S. Department of Education agree on a satisfactory repayment arrangement.
    - The U.S. Department of Education allows a student to retain eligibility for 45 days from the date that the institution sends the repayment notification to the student. To continue eligibility past 45 days, the student will either have to pay the overpayment in full or make satisfactory arrangements with the U.S. Department of Education to repay.
    - If the school returns the overpayment portion on behalf of the student, the student owes an **institutional debt** and remains **eligible** for federal aid.

Procedure

The Financial Aid Office is responsible for determining the number of days in the term based on the institution's published academic calendar, maintained by the JP, to use as the denominator in the calculation of earned/unearned funds. The determination of the number of days in the term should be completed using the R2T4 procedures, which include a term calculator.

The Financial Aid Office will determine the percentage of Title IV assistance the student earned up through the 60% point in the term.

For example, if the student completed 30% of their payment period or period of enrollment, they earn 30% of the assistance they were originally scheduled to receive (The remaining 70% is considered unearned and must be returned to the appropriate Title IV programs). Once they have completed more than 60% of the payment period or period of enrollment, they earn all the assistance that they were scheduled to receive for that period.

- The amount of earned financial aid is calculated on a daily basis from the first day of classes. The process uses a calendar rather than business days.
- Earned aid is determined by taking the number of days attended before enrollment ceased, divided by the total number of days in the term (first day of instruction until the last day of finals, excluding breaks of 5 days or more).
- The percentage of assistance earned is equal to the percentage of the payment period or period of enrollment completed as of the day the student withdrew, based on the withdrawal date or last date of academically related activity as recorded in the student records system.
- If the withdrawal occurs after the 60% point in the term, then the percentage

earned is 100%, and no refund/repayment is required.

The difference between the earned Title IV assistance and 100% equals the percentage of unearned Title IV funds subject to repayment by JP and/or the student. JP is responsible for returning to the federal aid accounts all unearned institutional charges and will return the unearned institutional charges to the Title IV programs in the order indicated below 34 CFR 668.22(i):

1. Unsubsidized Direct Stafford Loan
2. Subsidized Direct Stafford Loans
3. Direct PLUS Loans
4. Federal Pell Grant
5. Federal SEOG
6. Other Title IV assistance

Students are billed as an institutional charge through JP student receivables system for any financial aid funds repaid by JP.

If a student is entitled to aid that could have been disbursed prior to the student's withdrawal but had not been, the student may be entitled to the disbursement of that aid.

- If the earned aid is a federal grant, those funds will automatically be disbursed to the student.
- If the earned aid is in the form of a federal Direct Stafford Loan or Direct PLUS Loan, the student will be notified of the amount to which he/she is entitled. The student must notify the Financial Aid Office if he/she wish those funds to be disbursed. They will not be disbursed automatically.

13.5 Post-Withdrawal Disbursements (PWD)

Post-Withdrawal Disbursements – 34 CFR 668.22(a)(6)
Title IV aid to be disbursed or returned - 34 CFR 668.22(a)(4) or (5)
Disburse Grants Before Loans – 34 CFR 668.22(a)(6)(i)
Time Frame for Post-Withdrawal Disbursement of Grant Funds –
Cash Management Requirements for Student and Parent Authorizations – 34 CFR 668.165(b)
Time Frame for Notification of Eligibility for Post-Withdrawal Disbursement of Loan Funds – 34 CFR 668.22(a)(6)(iii)(A)
Deadline for Responding to an Offer of a PWD of Loan Funds – 34 CFR 668.22(a)(6)(iii)(A)(5)

Policy
A PWD may be required if the total amount of the Title IV aid earned as of the withdrawal date is more than the amount that was disbursed to the student. To be eligible to receive a post-withdrawal disbursement, students must have a complete financial aid file (verification completed and all documents satisfied) and meet all eligibility requirements.

Any PWD disbursement credited to the student's account will follow the cash management rules regarding authorizations and allowable charges. The only charges that can be paid with a PWD without the student or parent PLUS borrower authorization are current award year charges for tuition, fees, and institutionally provided food and housing, and prior year charges of $200 or less for tuition, fees, and institutionally provided food and housing.

A PWD, whether credited to the student's account or disbursed to the student or parent directly, must be made from available grant funds before available loan funds. Available grant or loan funds refer to Title IV aid that could have been disbursed to the student but was not disbursed as of the date of JP determination that the student withdrew. 34 CFR 668.22(a)(6)(i)

While the R2T4 calculation includes Title IV funds as aid that could have been disbursed, JP cannot make PWD based on the scenarios listed below:

- Second or subsequent Direct Loan disbursement to, or on behalf of, a student who did not graduate or successfully complete the loan period;
- Direct Loan to a first-time, first-year undergraduate who withdrew before completing the first 30 days of their program at JP that is not exempt from the delayed delivery or disbursement requirement;
- Direct Loan to a borrower who has not signed a promissory note; or
- Second Direct Loan disbursement to a student who withdrew before successfully completing the first payment period, which ends when the student completes both half of the weeks of instruction and half of the credit/unit hours in the academic year definition of a nonterm clock-hour program, or nonstandard-term credit-hour program with terms that are not substantially equal.

Post-Withdrawal Disbursement Timeless **Unless otherwise specified, the number of days begins from the date the College determined the student withdrew.**			
14 Days	30 Days	45 Days	180 Days
Student (or parent for PLUS Loans):	*College:*	*College:*	*College:*
• Minimum number of days the College must allow the student, or parent, to confirm post-withdrawal loan disbursement	• Notify the student, or parent, of eligibility for post-withdrawal Title IV loan disbursement and request confirmation from the borrower	• As soon as possible, but no later than 45 days, make a post-withdrawal disbursement of Title IV grant funds directly to the student	• As soon as possible, but no later than 180 days, if paying for allowable charges on the student's account • As soon as possible, but no later than

			180 days, make a PWD of Title IV loan funds

Procedure
JP

PWD of Title IV Grant Funds: PWD disbursements are either credited to the student's account to satisfy current outstanding allowable charges or paid directly to the student. JP may credit the student's account with the PWD of Title IV grant funds to cover current allowable charges without obtaining the student's permission for tuition, fees, and food and housing (if the student contracts with JP). JP must credit the student's account with the PWD for current charges within 180 days of the date of determination. Outstanding charges other than current charges will require the student's authorization to credit the student's account with Title IV grant funds. Any amount of PWD grant disbursement not credited to the student's account to cover allowable charges will be disbursed to the student within 45 days after the date of determination that the student withdrew. 34 CFR 668.22(a)(6)(ii)(B)(1)

JP may not delay its disbursement processes while it ascertains whether a student wishes to receive the grant funds he or she is entitled to. However, while JP is processing the disbursement or notifying the student about his or her eligibility for a post-withdrawal disbursement of grant funds, JP may, at its discretion, notify the student that it may be beneficial to turn down all or a portion of the grant funds to preserve grant eligibility for attendance at another institution. Of course, if the student independently contacts JP and states that he or she does not wish to receive a grant disbursement, JP is not required to send it. GEN-12-18 includes information on a student's Pell declination process.

PWD of Title Loan Funds: JP will notify a student, or parent for a Direct Parent PLUS Loan, in writing prior to making any post-withdrawal disbursement of loan funds, whether those loan funds are to be credited to the student's account or disbursed directly to the student (or parent).

- The information provided in this notification must include the information necessary for the student or parent for a Direct Parent PLUS Loan, to make an informed decision as to whether the student or parent would like to accept any disbursement of loan funds and must be provided within 30 days of the date of JP determination that a student has withdrawn. 34 CFR 668.22(a)(6)(iii)(A)
- The notice must request confirmation of any post-withdrawal disbursement that the student or parent, as applicable, wishes JP to make.
- The notice must identify the type and amount of the loan funds JP wishes to credit to the student's account or disburse directly to the student or parent, and explain that a student, or parent for a Direct Parent PLUS Loan, may accept or decline all or a portion of the funds.

- The notice must explain to the student, or parent for a Direct Parent PLUS Loan, the obligation to repay the loan funds, whether they are disbursed to the student's account or directly to the borrower.
- The notice must make clear that a student, or parent for a Direct Parent PLUS Loan, may not receive as a direct disbursement, loan funds that JP wishes to credit to the student's account, less JP agrees to do so. If the student, or parent for a Direct Parent PLUS Loan, does not wish to accept some or all of the loan funds that JP wishes to credit to the student's account, JP must not disburse those funds.
- JP must advise the student or parent that JP may set a deadline of 14 days or more and make clear that if the student or parent does not respond to the notification within the time frame, JP is not required to make the PWD.

Once JP has received confirmation from a student, or parent in the case of a Direct PLUS Loan, that they want to receive the PWD of loan funds, JP must make the PWD of Title IV loan proceeds as soon as possible, but no later than 180 days after the date of JP determination that the student withdrew. 34 CFR 668.22(a)(6)(iii)(C)

13.6 Returning Unearned Funds

Title IV Aid to Be Returned – 34 CFR 668.22(a)(4)
Amount of Unearned Title IV Aid Due from the School – 34 CFR 668.22(g)
Order of Return of Title IV Funds – 34 CFR 668.22(i)
Time Frame for Return of Title IV Funds – 34 CFR 668.22(j)(1)
Initial Amount Due from Student – 34 CFR 668.22(h)
Return of Title IV Funds by the Student – 34 CFR 668.22(h)(3)(i) and 34 CFR 668.22(h)(3)(ii)
Satisfactory Repayment Arrangements – 34 CFR 668.22(h)(4)(i)(B) and 34 CFR 668.22(h)(4)(i)(C)
Repayment Arrangements with Schools – 34 CFR 668.22(h)(4)(iii)
Two-Year Maximum – 34 CFR 668.22(h)(4)(iii)(B)

Policy
When an R2T4 fund is due, JP and the student may both be responsible for returning the funds. Any amount that JP repays will be billed to the student.

Funds Owed by JP: JP must return unearned Title IV funds for which it is responsible within 45 days of the date it determined the student withdrew 34 CFR 668.22(j)(1). The funds will be returned in the order below as prescribed by federal regulations, within 45 days from the date of determination that a student withdrew 34 CFR 668.22(i):

1. Unsubsidized Direct Stafford Loans (other than Direct PLUS Loans)
2. Subsidized Direct Stafford Loans
3. Direct PLUS Loans
4. Federal Pell Grant for which a return of Title IV funds is required
5. FSEOG for which a return of Title IV funds is required
6. TEACH Grants for which a return of Title IV funds is required

Loan Funds Owed by the Student or Parent: Students or parent PLUS borrowers with unearned Title IV loan funds to return will repay the loans according to the terms of the promissory note, 34 CFR 668.22(h)(3)(i).

Written notification is made to a borrower when JP pays a refund or return of Direct Loan funds to the U.S. Department of Education on behalf of the student at the time the Direct Loan funds are returned or refunded to the U.S. Department of Education, 34 CFR 685.306(a)(2).

Grant Funds Owed by the Student: JP will notify students that they have 45 days to repay the unearned portion of their Title IV funds. The notification will include consequences for failure to repay and options for repayment.

Student Grant Overpayments of $50 or Less: The student does not have to repay a grant overpayment of $50.00 or less per grant program for grant overpayments resulting from the student's withdrawal. JP is not required to attempt recovery of that overpayment, report it to National Student Loan Database System (NSLDS), or refer it to the Default Resolution Group (DRG). 34 CFR 668.22(h)(3)(ii)

Procedure

Funds Owed by JP:

Withdrawal reports are generated and acted upon each week, and JP designated staff member is notified immediately when there are unearned institutional charges that result in repayment of aid to the federal accounts. Funds are generally returned to the federal accounts within 30 days, but not more than 45 days, as provided in law. The Bursar's Office performs the return:

- Deposits or transfers the funds into JP federal funds bank account;
- Initiates the return of funds to the U.S. Department of Education electronically using the "Refund" function in G5; or
- Issues a check to the U.S. Department of Education

If JP owes a portion of the repayment as part of the R2T4 process, JP is permitted to seek repayment of this amount from the student.

- **Any amount that** JP **repays for this process will be billed to the student, creating a student financial obligation to** JP**.**
- If a student does not pay funds due to JP to cover their balance, the student's records will be placed on financial hold.
- A financial hold or obligation means he/she will not be permitted to register for classes or receive transcripts until the balance is paid.

Funds Owed by the Student:

The Financial Aid Office will notify students within 30 days of determining that the student withdrew of their responsibility to repay the overpayment. In the notification, information to the students includes the following:

- The student owes an overpayment of Title IV funds.
- The student's eligibility for additional Title IV funds will cease if the student fails to

take action by the 45th day following the date JP sent the notification to the student.

- The options for repayment that the student can take to remain eligible for Title IV funds beyond the 45 days.
- Consequences if the student fails to take action during the 45 days.
- The student's responsibility is to contact JP to discuss their repayment options within a 14-day response deadline.

If the student fails to take action to resolve the overpayment during the 45 days, JP will report the student's overpayment to the National Student Loan Database System (NSLDS) within 45 days of determination.

The student's overpayment will also be referred to the Default Resolution Group (DRG) for collection by using one of the following options:

- By Mail to:
  Student Loan Processing Center – Overpayments
  P.O. Box 4157
  Greenville, Texas 75403
- By FAX to (240) 931-3320

13.7 Overpayment Resolution

Policy

A student who owes a grant repayment remains ineligible for further Title IV assistance until the grant is repaid, unless the student and the U.S. Department of Education agree on a satisfactory repayment arrangement.

Procedure

The options that the student can take to remain eligible for Title IV funds beyond 45 days.

- The student may repay the overpayment in full to JP, 34 CFR 668.22(h)(4)(i)B) and (C).
- The student may sign a repayment agreement with JP (this is optional), 34 CFR 668.22(h)(4)(iii). There is a two-year maximum that JP may allow for repayment, 34 CFR 668.22(h)(4)(iii)(B).
- The student may sign a repayment agreement with the U.S. Department of Education.

After JP has reported and referred the student's overpayment to the U.S. Department of Education, JP will provide the student with the phone number and address for the Default Resolution Group. The student may contact DRG:

- By calling 1-800-621-3115
- Sending an email through Send Email | Debt Resolution (ed.gov)
- Writing to the Default Resolution Group at the following address:
  U.S. Department of Education
  Default Resolution Group

P.O. Box 5609
Greenville, Texas 75403

13.8 Leave of Absence (LOA)

Not all colleges have an established written policy regarding Leaves of Absence; however, pursuant to Washington Administrative Code (WAC) requirements, a written policy is mandatory specifically for medical Leaves of Absence.

JP

<<Insert College Procedures>>

13.9 Systems/Resources Used for R2T4

- ctcLink, https://myaccount.ctclink.us/
- ctc Link Reference Center: R2T4 Processing Business Process Guide
- Common Origination and Disbursement
- National Student Loan Data System (NSLDS) - Log-in Required
- EdExpress - Log-in Required

Section 14: Institutional Refunds

14.1 Overview and General Requirements

2024-2025 Federal Student Aid (FSA) Handbook, Volume 5, Chapter 1

An institutional refund represents the amount and type of an institutional charge returned to a student due to withdrawal from one or more classes, complete withdrawal from the institution, or class cancellation initiated by JP.

JP refund policy determines the amount to be returned to the student, which is typically based on one or more of the following factors:

- The date of the withdrawal,
- The percentage of the term completed,
- The number of credits/units from which the student withdrew.

JP may consider other factors, such as a student’s financial need, in implementing its policy.

Institutional refunds should not be confused with Return to Title IV funds (R2T4) requirements. Federal regulations do not dictate what JP may charge a student or how those charges are refunded. Also, the withdrawal date that JP uses in determining refunds is not required to be the same as the withdrawal date used in the R2T4 funds calculations. However, JP refund policy must comply with any applicable state, accrediting agency, or other outside agency requirements.

14.2 Institutional Refunds

Policy

JP follows the Revised Code of Washington refund policy RCW 28B.15.605. The JP is responsible for developing, updating, and distributing the institutional refund policy, as well as how it is disseminated.

The student is responsible for officially withdrawing from one or more classes before JP established refund deadline. The amount of the refund will depend on the date of the withdrawal. If the withdrawal date is after JP established refund deadline, no refund will be issued, unless approved through the JP.

If JP initiates the cancellation of classes, a 100% refund will be issued automatically to the student unless the student enrolls in a replacement class. If the replacement class is for fewer credits/units than the canceled class, the difference will be refunded.

Procedure

Student refunds are nearly identical for student self-pay or financial aid.

- Cash payments are usually refunded with a check. Credit card payments may be refunded either by check or returned to the credit card.
- To initiate the student refund check, JP must apply a check refund item type to the student account, which will send the liability to JP.
- For an electronic refund, the JP should apply either a credit card or a BankMobile refund item. Then, JP will process the refund to the student's credit card or submit an Electronic Funds Transfer (EFT) to BankMobile, depending on the fund type.

14.3 Withdrawal Policy

Policy

The JP establishes the official date of withdrawal for students based upon the date the student initiates the process by contacting <<Insert Office Name, for example, Student Advising, Financial Aid, Registrar, etc. Office). All withdrawals must be approved by JP.

Requests for approval must be submitted in writing JP when withdrawal procedures are initiated.
If a student is administratively withdrawn from school, the withdrawal date will be established by the office responsible for the action.

JP

Procedure

The student is responsible for officially dropping one or more classes or withdrawing completely from JP. The student may drop classes by utilizing one of the following options:

- Online through ctcLink
- In writing by submitting JP
- Email to JP official email

The withdrawal request will be reviewed within JP days, and the student will be notified of JP decision via JP official notification process.

14.4 Institutional Refund Components

Policy
Refunds will be made when a student withdraws from one or more classes or when a student completely withdraws from all classes by JP established deadline in the following situations:

- When a student pays more than the total amount due for institutional charges,
- When the total amount of disbursed financial aid exceeds the direct charges on a student's account,
- If a student drops individual courses within a specified refund period.

JP publishes academic calendars with specific cutoff dates that determine the percentage of tuition and fees eligible for a refund.

Procedure
Refunds are calculated based upon net charges for credits/units dropped if occurring prior to the official reporting date (based on JP established schedule/deadline).

- Overpayment of Tuition and Fees: the excess is credited to the student's account and processed as a refund.
- Financial Aid Disbursement: the excess funds are refunded to the student.
- Course Withdrawal: A prorated refund for the charges associated with those courses is issued.

<<Insert College Procedures>>

14.5 Institutional Refund and Repayment Appeals

Policy
JP will acknowledge a petition JP of a refund decision or exceptions to the refund policy to JP.

JP academic calendar will specify the last day for withdrawal with a refund.

Procedure

The student will submit a JP and explanation of extenuating circumstances to JP. The student must submit a request for refund by JP established deadline for the term for which the refund is requested.

Refund petitions JP must include, but may not be limited to, appropriate documentation to support the extenuating circumstances. It is the student's responsibility to follow JP petition JP procedure, guidelines, and timelines.

The petition JP will be reviewed within JP days and the student will be notified of the decision via JP official notification process.

<<Insert College Procedures>>

14.6 Systems/Resources Used for Institutional Refunds

- ctcLink, https://myaccount.ctclink.us/

Section 15: Satisfactory Academic Progress (SAP)

15.1 Overview

Federal regulations require that colleges set standards that the student must meet to continue to be eligible for Title IV financial aid. Satisfactory Academic Progress (SAP) measures the successful completion of a student's academic program using multiple standards.

SAP for students receiving federal Title IV financial assistance will be evaluated at the end of each payment period after grades are posted, to determine eligibility for the following academic term. This review is based on the student's entire academic record (including transfer credits/units, if accepted by JP even if a student did not receive financial aid for a previous period of enrollment.

All enrollment within a term, including flex-term courses (mini-terms, modules, or sessions), and exclusions JP, are assessed as part of the full term. To be eligible for financial aid, the student must comply with all standards regarding cumulative grade point average (qualitative), completion rate (quantitative), and maximum time frame. 34 CFR 668.34

1. Qualitative Measure: This utilizes a student's cumulative grade point average (GPA) across all coursework and requires a student to maintain a 2.0 cumulative GPA.
2. Quantitative Measure: This uses a student's pace of completion (PACE) across all coursework and requires a student to maintain a minimum of <<Insert College Percentage, for example 66.67%>> or greater cumulative credit/unit completion rate (including transfer credits/units, if accepted by JP).
3. Maximum Time Frame (MTF): This calculates that all required coursework should be completed within 150% of the published length of the student's program of study.

At the end of each review period, the SAP evaluation will result in a SAP status. The SAP statuses below reflect both the policy terminology and corresponding system status codes to ensure consistency and clarity:

<<This is an Example, Insert College Statuses>>

- Good Standing (MEETS): Student meets all SAP standards and is eligible for Title IV aid.
- Warning (WARN): Student does not meet SAP standards for the first time and is placed on Financial Aid Warning for one term but remains eligible for Title IV aid.
- Probation (PROB): Student has an approved SAP appeal and is eligible for Title IV aid for one term. While on probation, the student is required to meet the 66.67% pace and a cumulative GPA of at least 2.0 to return to Good Standing. Students who do not meet SAP while on probation at the end of the term will be placed on suspension.
- Max Time Frame (MAXT): Student on suspension due to the maximum timeframe.

- Suspension (SUSP): Student did not meet SAP standards, or the SAP appeal was denied.

Transfer Credits/Units: Credits/units from other institutions that are recognized by JP Registrar will count towards PACE and MTF for the student's degree or eligible certificate. Transfer Credits/units are not included in the GPA calculation.

Consortium credits/units on the transcript will count as attempted credits/units for PACE and MTF. The student's GPA will count in the calculation of GPA.

Developmental or Prerequisite Coursework: For financial aid purposes, "for-credit developmental courses" are English, Math, and Human Development courses which are deemed below the 100 level. Classes below 100 level, ***excluding*** Adult Basic Education Classes and high school + classes, will count in the calculation of GPA and term/cumulative attempted credits/units.

Pre-requisite means any course above 100 level needed to enter into minimum degree requirements.

<< Insert College Procedures>>

For example, A maximum of 45 for-credit developmental/pre-requisite courses will be excluded from the maximum time-limit requirement. Once 45 credits have been reached, financial aid will no longer pay for these courses. Developmental and prerequisite course progress is included in GPA/qualitative and Pace of Progression/quantitative standards.

Repeat Coursework: Will count as attempted credits/units and, if passed, will be considered earned. Earned coursework may be repeated one time, with financial aid.

<< Insert College Procedure>>

Grade changes: Federal regulations as prescribed in 34 CFR 668.34(a)(3) states that SAP calculations must be performed at established intervals which must coincide with the end of a payment period. When there is a grade change within a term after the SAP calculation has been completed,

<<Insert College Procedure for student self-identifying grade changes and example>>

Change of Major or Program: For students receiving Title IV federal financial aid, the number of times that a student may request a change will depend on JP policy for changing their declared major or academic program.

<<Insert College Procedures>>

JP grading policy can be found at JP.

[2024-2025 Federal Student Aid Handbook, Volume 1, Chapter 1: School Determined Requirements]

Business Process Guide in PeopleSoft is available at [CTC Link – SBCTC SAP Business Process]

[Current Bachelor's Degree Programs]

15.2 Same As or Stricter Than

Policy

JP SAP policy is the same as or stricter than the general standards for students enrolled in the same academic program(s) who are not receiving Title IV aid by each of the individual schools.

The standards against which all financial aid recipients are measured include Quantitative, Qualitative, and Maximum Time Frame. SAP will be calculated at the end of each payment period (quarter).

Procedure

The Director of Financial Aid at JP is responsible for reviewing the SAP policy to ensure it meets all federal requirements and seeking final approval for implementation from the appropriate JP.

JP financial aid staff works closely with representatives from the <<Insert Office Name, for example Student Services Office) to communicate the importance of the SAP policies and to develop procedures on how the Financial Aid Office is notified of any changes made by JP in its academic policies.

15.3 Qualitative Measure

Policy

In order to be considered as meeting satisfactory academic progress, students must meet a JP in their program of study at each SAP evaluation.

Procedure

The student's cumulative GPA will be evaluated at the end of each payment period (quarter) once final grades are posted. Students who do not meet the GPA minimum requirement are notified through their ctcLink account and provided with information regarding appeal procedures, if applicable.

The following procedures are used to review the qualitative standards:

- The Financial Aid Office utilizes ctcLink to run SAP via batch or per student.
- Students who do not meet the SAP minimum requirements will receive JP and will be provided with information regarding their SAP status, appeal procedures and appropriate checklists, if applicable.

15.4 Quantitative Measure

Policy

Pace of progression (PACE) is the percentage of credits/units completed compared to credits/units attempted.

In order to make satisfactory academic progress, students must complete a minimum of 66.67% of cumulative credits/units attempted. This minimum considers academic work regardless of whether or not financial aid has ever been received for that coursework or for the student at all.

Procedure

- A student's academic progress will be evaluated at the end of payment period (quarter).
- Students who do not meet the PACE minimum requirements will receive JP and will be provided with information regarding their SAP status, appeal procedures and appropriate checklists, if applicable

The following are variations of credits/units attempted:

- All college-level courses and pre-requisite courses (see definition above*)
- Credits/units transferred from other schools to JP and recorded in ctcLink
- Pass (P), Satisfactory (S), Credit (CR) grades are considered as "completed"
- Grades of JP are considered as "not completed"; however, the credits/units attempted will be included in the PACE and MTF calculation.

15.5 Maximum Time Frame

Policy

The number of units to complete a certificate or degree varies based on the program of study (major). Federal regulations specify a maximum time frame not to exceed 150% of the published length of the academic program in which the student must complete the program.

- For example:
    - Certificate program of 30 units X 150% = 45 units for the Maximum Time Frame
    - AA degree program of 60 units X 150% = 90 units for the Maximum Time Frame

A maximum of 45 credits/units will be allowed for required development coursework. If at any point it is determined that a student cannot mathematically complete their program within this maximum time frame, they will no longer be eligible for Title IV student aid. This determination applies regardless of whether the student has previously received financial aid.

The number of programs of study (degrees) changes permitted is JP and/or a student who are within JP credits/units of completing their current program of study will not be permitted to change programs (with the benefit of financial aid) until their current program is completed.

Procedure
Courses used to determine if a student is meeting the Maximum Timeframe criteria are as follows:

- All courses for which the student registered, including repeat courses, remedial coursework, JP

, and credits/units transferred from other institutions and accepted by JP. Note the following are excluded JP.

- Courses transferred through a consortium agreement.
- Repeated courses in which JP has been applied.
- Credits/units earned in the Running Start/Dual-Credit program, if applicable.

Students who do not meet the Maximum Time Frame minimum requirements will receive JPand will be provided with information regarding appeal procedures, if applicable.

15.6 Financial Aid Warning

Policy
Students will be placed on Warning Status if:

- The student does not meet one or more SAP standards at the end of a term or payment period.
- It is the first SAP failure after a previous SAP evaluation where the student was meeting standards.

The Warning Status lasts only one term the student is enrolled. An enrolled student in Warning will move into Good Standing if they are able to improve their GPA and completion rate to the standard described above or moved to a suspended status if they are not able to improve their GPA and/or completion rate.

JP

Procedure
Students will be notified via JP official means of communication to students of their Warning Status.

While on financial aid warning, students will be eligible for financial aid during their warning term when,

- The student remains eligible for aid and program changes during a period of financial aid warning and does not need to file an appeal.
- Students will need to raise their GPA and/or completion rate and stay below the 150% completion threshold at the completion of their term on warning to meet SAP requirements and continue receiving aid in subsequent terms.

After the applicable warning period, students not in good standing or those not meeting SAP during the initial evaluation will not have eligibility for any further financial aid until they have met the requirements for SAP or have been granted an appeal approval. To do so, students may follow the appeal process or the reinstatement procedures as outlined below by JP for students who are receiving financial aid.

15.7 Financial Aid Probation

Policy
A financial aid probation status may be given to students who successfully appeal their Suspension Status and will be given one quarter to return to Good Standing.

- A student may also be placed on a Financial Aid Academic Plan JPas a condition of the appeal.

Procedure
Students who regain financial aid eligibility through an approved appeal will be placed on Financial Aid Probation for one probationary quarter. During this probationary period, the student is eligible to receive financial aid.

At the conclusion of the probationary quarter, JP will evaluate the student's academic record to determine whether the student:
- Has met all Satisfactory Academic Progress (SAP) standards and is returned to Good Standing, or
- Has failed to meet SAP standards and will be placed on the appropriate SAP status in accordance with College policy.

The probationary quarter is included in the student's total enrollment and attendance timeframe for SAP evaluation purposes, including maximum timeframe calculations.

If, at the end of the probationary period, the student is not meeting SAP standards, the student's academic progress will be reviewed in accordance with the terms outlined in the JP. Continued financial aid eligibility will be determined based on compliance with the requirements of that approved academic plan.

15.8 Appeals

JP
Policy
To comply with Section 484(a)(2) of the Higher Education Act of 1965 and make decisions regarding appeals concerning academic progress, financial aid offers, and/or other matters related to the administration of student financial assistance in accordance with 34 CR 668.34, a student who has lost financial aid eligibility due to extenuating circumstances may appeal.

Per federal regulation, extenuating circumstances that may be considered in the appeal process include:
- personal illness or accident,

- serious illness or death within the family, or
- other unforeseen circumstances beyond the reasonable control of the student.

Per federal regulations, the condition or situation that caused the student not to meet satisfactory academic progress standards must be resolved. It should not negatively affect the student's ability to complete coursework successfully.

Students who experienced unforeseen circumstances beyond their control that prevented them from meeting SAP requirements may submit a SAP Appeal to JP Financial Aid Office by the established deadline .

Appeals are reviewed by the Financial Aid Office. Students will be notified of the decision as soon as possible, typically within JP days. However, processing times may be extended during peak periods. Students should submit appeals promptly to ensure timely review and avoid delays in financial aid disbursement.

JP

Procedure
Appeals will be reviewed in the order in which they are received. The appeal must be received at JP Financial Aid Office no later than the established deadline by JP for the term they are filing an appeal.

Required documentation for all Financial Aid Satisfactory Academic Progress Appeals:
<<Insert College Procedures>> For example...

- A completed Financial Aid Satisfactory Academic Progress Appeal Form
    - <<Insert College Form Name for example, The Petition for Reinstatement of Financial Aid form>> is used when the SAP suspension is due to not meeting the qualitative or quantitative SAP requirements.
    - <<Insert College Form Name for example, The Petition for Extension of Financial Aid form>> is used when the SAP suspension is due to the maximum timeframe requirement.
- A detailed explanation of the extenuating circumstances that prevented the student from meeting Satisfactory Academic Progress requirements:
    - What outside circumstances resulted in the SAP suspension?
    - When did these circumstances occur?
    - Documentation to support the statement
    - How have the extenuating circumstances been resolved?
    - Student's plan of action for academic improvement
    - For maximum timeframe appeals, explain any degree or career changes, previous degree(s), repeated/failed coursework, or intentional coursework that contributed to the suspension.
- Meet with <<Insert Staff Title, for example an Academic Advisor) to complete the Academic Plan and the appeal form, if required.

Circumstances that constitute a Financial Aid Satisfactory Academic Progress Appeal and their corresponding documentation include, **but are not limited to**:

- Medical, including Mental Health Conditions*
    - Doctor's statement
    - Medical bill or discharge paperwork
    - Record of doctor/therapy appointments
    - Doctor's letter

*Note: May be limited by HIPA standards.

- Death of a Family Member or Guardian
    - Documentation establishing an immediate relationship with the deceased.
        - Birth certificate
        - Court documents
        - Other official documentation listing parent, guardian, or other immediate family member, such as a death certificate, will, estate, or obituary.
- Life-Altering Events
    - Documentation showing circumstances outside of the student's control, such as divorce, domestic violence, sexual assault, unexpected loss of housing, major family disruptions, court-mandated relocation, custody changes, or incarceration of a primary financial provider, etc.
    - Police reports, restraining orders, or court documents
    - Letters from social workers, psychiatrists, clergy, attorneys, or other official documents.
    - Insurance claim for property loss
- Military Service Obligations
    - Military orders, Letter from commanding officer, DD-214, or other official military records
- New or Additional Caregiver Responsibilities
    - Medical records of the individual requiring care,
    - Legal guardianship or custody documents
    - Letter from a healthcare provider
- Maximum Time Frame, if applicable <<Insert College Procedures>>
    - Documentation must support the reason(s) that contributed to exceeding the maximum time frame.

Financial Aid Satisfactory Academic Plan Deadlines by Term JP:

Fall Term	
Winter Term	
Spring Term	
Summer Term	

Outcome of a Financial Aid Satisfactory Academic Progress Appeal

- If a Financial Aid SAP Appeal is approved:
    - The student will receive JP .
    - Students on suspension due to not meeting the qualitative and/or quantitative SAP requirements will have a SAP status of "Probation" for

one quarter. Depending on JP SAP process, the student may need to develop an “Academic Performance Plan” detailing the steps to meet SAP standards during the probationary term.

    - Students on suspension due to the maximum timeframe will have a SAP status of MAXT.
    - The student account will be reviewed for eligibility and any other outstanding Financial Aid requirements.
    - If applicable, revisions will be made to students’ financial aid offer.
    - Students’ files will be documented with the Financial Aid SAP Appeal decision, the date of the action, and the person(s) involved in the determination.
- If a Financial Aid SAP Appeal is pending and requires additional information/documentation for review:
    - The student will receive notification through JP official notification process.
        - The student will be responsible for contacting JP <<Insert Office Name, for example Financial Aid Office>> directly regarding the request for additional information/documentation.
    - If the additional information/documentation is received before the term deadline outlined previously, it will be added to their previously submitted Financial Aid SAP Appeal. It will be returned to the committee for review.
    - If the additional information/documentation is not received before the term deadline <<Insert College Procedures>> outlined previously, the student’s Financial Aid SAP Appeal will be denied, and the student will be responsible for payment of the outstanding balance reflected on their student account.
- If a Financial Aid SAP Appeal is denied:
    - The student will receive notification through JP official notification process.
    - The student’s file will be documented with the decision, date of the action, and the person(s) involved in the determination.
    - The student will be responsible for the payment of the outstanding balance reflected on their student account or it would be their responsibility to drop their courses by the 100% refund deadline to avoid any charges.
- All decisions made by the Financial Aid Office are final.

15.9 Regaining Eligibility

Policy

A student who has been suspended due to financial aid SAP eligibility may be reinstated after the student meets the minimum GPA requirement of a 2.0 and a minimum completion rate of 66.67%, and other applicable Title IV qualifications.

Procedure

A student must be able to complete their degree or certificate within the 150% timeframe.

<<Insert College Procedures>>

15.10 Notices

Policy

Students are informed of requirements to meet SAP in order to receive Title IV aid in the JP Catalog and are actively notified via JP official means of communication with students.

For passive notice, SAP requirements are also published on JP website, JP, and referenced throughout various communications with students.

Students who do not meet SAP will be notified via JP official means of communication with students.

Procedure

The Director of Financial Aid at JP is responsible for placing the SAP requirements in the College Catalog and actively notifying students via JP official means of communication.

The student will receive written notification through JP official notification process, and their SAP status will be available on the ctcLink portal in the Award Summary under the Financial Aid Tile. Changes/updates to the students' statuses are also received via the same methods.

15.11 Washington State SAP Policy

The Washington College Grant Team issued guidance on April 17, 2024, stating that the State Satisfactory Academic Progress will align with the Federal Satisfactory Academic Progress policy beginning with the 2024-2025 academic year.

Programs subject to Washington State Satisfactory Academic Progress standards are,

- Washington College Grant (WCG)
- College Bound Scholarship (CBS)
- State Work Study (SWS)
- Passport to College (PTC) Scholarship

15.12 Systems/Resources Used for Satisfactory Academic Progress

- ctcLink, https://myaccount.ctclink.us/

Section 16: Financial Aid Fraud

16.1 Overview

34 CFR 668.16(g)
Dear Colleague Letter (GEN-11-17)
Mitigating Enrollment Fraud - Institutional Practices & Reporting Obligations - 2023-02-24 final

Financial Aid Fraud is the intentional misrepresentation, deception, or falsification of information for the purpose of securing student financial aid funds (federal, state, or institutional) that the individual is not eligible for or not eligible to the extent received. It can be committed by students, institutional employees, or third parties and may involve false statements, fake documentation, or misuse of funds.

An indication of fraud is when financial aid is applied for, received, or not spent for its intended purpose, generally through theft, misappropriation, or false statements. Violations can lead to loss of aid eligibility, repayment obligations, institutional penalties, and criminal prosecution.

In recent years, federal financial aid programs have seen an increase in fraud, particularly involving distance education. An institution without effective fraud prevention policies risks disbursing aid to students who have no intent to complete coursework, which can negatively impact students and institutions by increasing cohort default rates, increasing uncollectible accounts, and failing in its responsibility as a steward of the taxpayer investment in the student assistance programs.

This policy establishes:

- Procedures to ensure compliance with statutory and regulatory requirements governing financial aid.
- Procedures and actions taken by institutions to prevent and address fraudulent activities.
- Steps for reporting suspected fraud, investigating cases, and ensuring complianc e with regulations.

The policy is designed to protect students' financial aid and ensure the integrity of the e ducational process. All college staff members are responsible for detecting and reporting fraud.

Responsibilities in this Policies and Procedures (P&P) manual are institutional and not department specific. Colleges must define local roles and enforce separation of duties in accordance with applicable federal and state regulations and internal control standards to prevent and detect fraud in Title IV and state financial aid programs.

16.2 Student Fraud

Policy

JP refers any suspected cases of fraud to the proper authorities. Common examples of financial aid fraud include, but are not limited to:

- Falsified documents or forged signatures on an application, verification documents, loan promissory notes, or any other documents submitted to the Financial Aid Office
- False claims of independent status.
- False claims of citizenship.
- Use of false identities (identity theft or “Ghost Students”), including aliases or the use of another person’s Social Security Number.
- Forgery of signatures or certifications on documents, such as institutional aid applications, the FAFSA® or WASFA, documents submitted for verification, and loan promissory notes.
- False statements of income, assets, or household size.
- Enrollment manipulation (registering for courses and withdrawing after disbursement of funds).
- Patterns of misreported information from one year to the next.

Investigations will include:

- The gathering and careful review of a suspicious student’s academic and financial aid files,
- Construction of a written chronology (supported by documentation) of financial and academic events at the college involving the student at issue,
- Review of the student’s financial aid lender history as reported by National Student Loan Database System (NSLDS), and
- Other applicable information.

Procedure
To identify cases of suspected fraud, JP has developed and implemented a system of checks and balances to resolve conflicting information with respect to a student’s application for federal, state, and institutional aid programs. Some sources JP may use to resolve these conflicts are:

- All student aid applications (e.g., federal, state, institutional, etc.).
- Need analysis documents (e.g., Institutional Student Information Records (ISIRs) and Student Aid Reports (SARs).
- Copies of state and federal tax returns.
- Information regarding a student’s citizenship.
- Previous educational experience (e.g., falsified school credentials, such as a high school or college diploma).
- Documentation of the student’s Social Security Number.
- JP

If an admissions or financial aid application is suspected to be fraudulent, JP is responsible for trying to verify the student’s identity. JP will contact the student to schedule an in-person or virtual meeting and ask the student to submit documentation to verify their identity. This documentation may include, but is not limited to:

- Unexpired government-issued photo identification (ID), such as, driver's license, state-issued identification card, passport, or visa
- Official transcripts from any other institution of higher education the student has previously attended
- Proof of residency at the address listed on the student's records
- Employment Authorization document

If the student does not comply, there is no response, or insufficient information is provided, the applicant/student must be reported to ctcLink Support through the Washington State Board for Community and Technical Colleges (SBCTC) in the ticketing system.

- JP local security administrator must lock the fraudulent student account and place the "Fraudulent Account" (SXF) service indicator on the account.
- JP files a ticket in SolarWinds. Find complete instructions in the Reporting Fraudulent Applications and Student Accounts to SBCTC Quick Reference Guide (QRG).
    - JP must immediately apply the "Under Investigation for Fraud" (SXI) service indicator in SolarWinds (ctcLink ticket system), indicating the application/student is being investigated.

If there is **documented monetary loss** (refers to the verified financial impact to the institution, federal government, or financial aid program resulting from fraudulent activity involving Title IV or other student aid funds), JP must report to:

- Washington State Auditor's Office, **and**
- SBCTC Business Operations
- See Referral section below

Additional information for reporting state aid fraud can be found in the WCG and CBS program manuals.

If the **monetary loss is federal financial aid fraud**, JP must also report to the U.S. Department of Education Office of Inspector General (OIG).

16.3 Institutional and Third-Party Fraud

Policy

In accordance with Federal regulations requiring institutions to report individuals who purposely supply false or misleading information to receive student financial aid, JP will report to the Office of Inspector General (OIG) any individual committing fraud on an application for financial aid, or any individual who fraudulently manipulates the financial aid programs or process for personal gain.

JP will refer employees or services who are suspected of having engaged in fraud or other criminal misconduct in connection with the Title IV programs to the U.S. Department of Education's Office of Inspector General (OIG).

Common examples of criminal misconduct by college employees or third parties include, but are not limited to:

- Altering income data, Satisfactory Academic Progress (SAP) records, or enrollment status to maintain Title IV eligibility for students or institutional gain.
- Failing to return unearned Title IV aid for students who withdraw early or deliberately delaying withdrawal processing to retain more funds.
- Reporting students as attending when they never began classes to retain Pell Grant or loan disbursements.
- Offering aid to ineligible recipients (friends, family, or fabricated students).
- Diverting institutional or donor funds for personal or unauthorized use.
- Forgery of signatures or certifications.
- Any credible information indicating that any employee, third-party servicer, or other agent of the institution that acts in a capacity that involves the administration of the Title IV programs, or the receipt of funds under those programs, may have engaged in fraud, misrepresentation, conversion, or breach of fiduciary responsibility, or other illegal conduct involving the Title IV programs.
- Disbursement or authorization of Title IV funds to an ineligible student.
- Payment of any commission, bonus, or other incentive payment based in any part, directly or indirectly, upon success in securing enrollments or the offering of financial aid to any person or entity engaged in any student recruitment or admission activity or in making decisions regarding the offering of Title IV federal student aid program funds.

The type of information that an institution must refer to the U.S. Department of Education's Office of Inspector General (OIG) is that which is relevant to the eligibility of funding of the institution and its students through the Title IV programs.

JP

Procedure
JP financial aid staff attends training at state, regional, and national training conferences and is trained to be alert for any signs of fraud when reviewing financial aid files.

JP will refer any third-party servicer who may have engaged in fraud, breach of fiduciary responsibility, or other illegal conduct involving the Federal Student Aid (FSA) Programs.

In general, investigations will include:

- The gathering and careful review of a suspicious student's academic and financial aid files,
- Construction of a written chronology (supported by documentation) of financial and academic events at the collegeinvolving the student at issue,
- Review of the student's financial aid lender history as reported by NSLDS, and
- Other relevant information.

Should a potential case of fraud be uncovered:

- The case is referred to JP for review and investigation.
- The JP will consult with JP administration and/or legal counsel prior to referring it for investigation to the Office of the Inspector General (OIG) of the U.S. Department of Education or any agency outside JP.

16.4 Fraud Detection

Policy
Financial Aid staff are responsible for carefully reviewing financial aid applications, ISIR data, verification documents, and all supporting documentation for accuracy, completeness, and consistency.

Staff must review financial aid applications for conflicting information, altered or suspicious documents, identity discrepancies, or other indicators of potential fraud.

Procedure
When a potential issue is identified, financial aid staff are required to document the concern and promptly refer the matter to the Financial Aid Director or designated compliance official for further review.

The Financial Aid Office will suspend processing and disbursement of aid, when appropriate, until the issue is resolved.

The office is responsible for maintaining proper documentation, ensuring corrective actions are taken when necessary, and referring confirmed or suspected fraud to institutional leadership.

Through ongoing staff training, internal controls, file reviews, and compliance monitoring, the Financial Aid Office helps safeguard financial aid funds and ensures they are awarded only to eligible students in accordance with federal, state, and institutional regulations.

16.5 Referrals

Policy
When a fraudulent financial aid application is suspected, enrollment fraud detection relies on JP staff and faculty to identify, confirm, and report.

Based on the results of this investigation, the Financial Aid Office, other relevant JP representatives, and JP legal counsel will jointly determine whether the evidence supports reporting the matter to appropriate authorities.

Procedure
Federal Reporting Requirements
JP will refer applicants who are suspected of having engaged in fraud or other criminal misconduct in connection with the Title IV programs to the U.S. Department of Education's Office of Inspector General (OIG).

U.S. Department of Education Office of Inspector General (OIG) Contact Information Address: OIG Headquarters, U.S. Department of Education, 400 Maryland Avenue, SW, Washington, DC 20202-1500

Website: https://oig.ed.gov/contact-us

Hotline: https://oig.ed.gov/oig-hotline

Phone: 1-800-MIS-USED (1-800-647-8733)

Hours: M, W 9–11 a.m. T, Th 1–3 p.m.

Regional Offices: An updated listing of regional offices and contact information is available at https://oig.ed.gov/contact-us

If it is determined that the issue is to be reported to the U.S. Department of Education Office of Inspector General, one of the following methods will be used:

- Completing a Hotline Complaint Form online
- Downloading a hardcopy of the Hotline Complaint Form, completing it, and mailing or faxing it to the U.S. Department of Education Office of Inspector General.
- Calling the toll-free number (1-800-MIS-USED).
- Calling a U.S. Department of Education Office of Inspector General in the school's area (regional offices and contact information are available at https://oig.ed.gov/contact-us).
- Suspected fraud rings at schools should be submitted through the encrypted complaint web portal at https://oighotlineportal.ed.gov.

State Reporting Requirements

Financial aid fraud in Washington State has become a significant concern, with reports of ghost students and fraudulent applications. The Washington State Board for Community and Technical Colleges (SBCTC) has implemented measures to detect and report fraudulent student activity, including technical guidance, tools, policies, and resources.

Based on the results of this investigation, the Financial Aid Office, other relevant JP representatives, and JP legal counsel will jointly determine whether the evidence supports reporting the matter to appropriate authorities.

Instances of financial fraud (monetary loss of any amount) must be reported to both the Washington State Auditor's Office (SAO) and SBCTC Business Operations with documentation. All state agencies must immediately notify the SAO of any fraud, loss of public resources, or suspected illegal activity targeting public resources. There is no monetary threshold that waives this requirement so any real or suspected fraudulent applications or real or attempted fraudulent access to financial aid must be reported. RCW 43.9.185 Loss of public funds—Illegal activity—Report to state auditor's office.

Submit Fraud Report to Washington State Auditor's Office.

SBCTC Business Operations
Based on the results of the fraud investigation, the Financial Aid Office, other relevant JP representatives, and JP legal counsel will jointly determine whether the evidence supports reporting the matter to appropriate authorities.

After reporting to the SAO, reporting through the online form to notify SBCTC Business Operations, including a description of the information provided to the SAO is completed.

Submit Fraud Report to SBCTC Business Operations.

16.6 Fraud Prevention

Policy
The Financial Aid Office is committed to ensuring the integrity of all federal, state, and institutional financial aid programs. The office maintains internal controls and review processes designed to prevent suspected financial aid fraud and abuse in compliance with all applicable regulations.

Procedure
Staff are responsible for carefully reviewing all application information, including ISIR data, verification documents, identity information, and any conflicting or unusual information that may indicate potential fraud or misrepresentation. When indicators of possible fraud are identified, staff must document the concern in the student's record and immediately notify the Financial Aid Director or designated compliance official.

- The office will suspend further processing and disbursement of aid, as appropriate, until the issue is reviewed.
- The Financial Aid Director or designee will conduct a review of the student's records, request additional documentation if necessary, and determine whether an error, discrepancy, or suspected fraud exists.

If fraud is confirmed or strongly suspected, the Financial Aid Office will:

- Take appropriate corrective action,
- Adjust or cancel financial aid,
- Return funds to the appropriate program, if necessary, and
- Document all findings and actions taken.

Documentation of suspected fraud, investigations, and resolutions will be maintained in accordance with institutional record retention requirements, and these procedures will be reviewed periodically to ensure ongoing effectiveness and compliance.

16.7 Systems/Resources Used for Financial Aid Fraud

- Resources for Financial Assistance Administrators | WSAC

Section 17: Audit Standards (Quality Assurance)

17.1 Overview

The administration and oversight of federal, state, and institutional financial aid is a shared responsibility across the College and is not limited solely to the Financial Aid Office. Effective financial aid administration requires coordinated involvement from multiple departments, including but not limited to academic affairs, admissions, registrar, business/finance, information technology, and institutional leadership. Each area plays a critical role in ensuring compliance with applicable regulations, accurate data reporting, timely communication, and the appropriate stewardship of financial aid funds.

Any institution of Higher Education that participates in one or more Federal Student Aid (FSA) program(s) must generally have an independent public accountant or a government auditor conduct an annual audit. The audit must include,

- A compliance audit to confirm that the institution follows the laws and regulations for Title IV programs that it participates in as an institution.
- An audit of its financial statements, which provides the U.S. Department of Education with the information needed to assess the institution's overall financial responsibility.

Single audits, which are financial and compliance audits of public or private nonprofit institutions of higher education, are performed in accordance with Subpart F—Audit Requirements of Title 2 of C.F.R., Chapter II, Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 C.F.R. part 200) and the Compliance Supplement.

To demonstrate compliance with Title IV financial and administrative standards, institutions are required to submit a compliance audit and a financial statement audit that meet specific regulatory requirements, including the following,

- The audits must be conducted in accordance with the Generally Accepted Accounting Principles (GAAP) and the Generally Accepted Government Auditing Standards (GAGAS).
- They must include all Title IV, HEA program transactions that have occurred since the period covered by the institution's last compliance audit.
- They must be prepared by an independent public accountant or a government auditor, except that a government auditor must meet the government auditing standards qualification and independence standard, including standards related to organizational independence.
- All single audits are submitted to the Federal Audit Clearinghouse, and single audits of institutions of higher education are also submitted to the U.S. Department of Education's eZ-Audit system.
    - o The compliance audit and financial statement audit may be performed by different auditors, but they must be submitted as one package via the U.S. Department of Education's eZ-Audit website.

As provided under section 498(c)(1) of the HEA, 34 CFR 668.171(a), the Secretary determines whether an institution is financially responsible based on the institution's ability to,

- Provide the services described in its official publications and statements.
- Meet all its financial obligations.
- Provide the administrative resources necessary to comply with Title IV, HEA program requirements.

An institution is **not** deemed able to meet its financial or administrative obligations if,

- It fails to make refunds under its refund policy, return Title IV, HEA program funds for which it is responsible under 34 CFR 668.22, or pay Title IV, HEA credit balances as required under 34 CFR 668.164(h)(2);
- It fails to make repayments to the U.S. Department of Education for any debt or liability arising from the institution's participation in the Title IV, HEA programs.
- It fails to make a payment in accordance with an existing undisputed financial obligation for more than 90 days.
- It fails to satisfy payroll obligations in accordance with its published payroll schedule.
- It borrows funds from retirement plans or restricted funds without authorization.
- It is subject to an action or event described in 34 CFR 668.171(c) (mandatory triggering events), or an action or event that the U.S. Department of Education has determined to have a significant adverse effect on the financial condition of the institution described in 34 CFR 668.171(d) (discretionary triggering events).
- The institution or any persons affiliated with it are not subject to a condition of past performance. 34 CFR 668.174(a) or (b).

Both the compliance audit and the financial statement audit must be conducted on a fiscal year basis. When an institution's fiscal year does not coincide with an award year, the institution's compliance audit will cover parts of two award years.

An institution's compliance and financial statement audits performed under the OIG's Audit Guide must be submitted to the U.S. Department of Education by the date that is the earlier of:

- Thirty days after the later of the date of the auditor's report for the compliance audit and the date of the auditor's report for the audited financial statements; or
- for audits performed under the Compliance Supplement of 2 CFR Part 200, which is for public and private nonprofit schools, the deadline is nine months after the end of the school's fiscal year.

In addition to audit requirements, a Direct Loan institution is required to implement and document a quality assurance process within their financial aid office operations to ensure compliance with federal program requirements and meeting program objectives. 34 CFR 685.300(b)(9)

17.2 Type of Audit

Policy

JP is a public institution and is subject to the requirement of a Single Audit by an independent auditor.

The Office of Inspector General (OIG) also conducts audits of postsecondary institutions. The OIG has the authority to audit any program or entity that relates to the U.S. Department of Education's programs and operations or that receives funds from the U.S. Department of Education, including colleges and universities that receive Title IV funds. An OIG or other federal audit does not satisfy the requirement that an institution has annual compliance and financial statement audits performed by an independent public accountant.

Each year, Washington State Community and Technical Colleges (SBCTC) select areas of operations or programs to review, based on risk. Federal and State grants are also reviewed for compliance with regulations at each College and fund recipient.
Each College receives feedback outlining the results of the review, including recommendations for improvements. Management receives summary reports, along with recommendations for program guidance enhancement, to encourage continuous improvement in communication with the Colleges and other fund recipients (System Audits and Reviews).

Procedure
JP offices involved in the audit may include,
- Fiscal Services (Controller's office)
- Accounts Payable
- Purchasing
- Human Resources/Payroll
- Enrollment Services
- Financial Aid
- Student Accounts
- <<List Additional Offices, as determined by the College>>

JP offices responsible for addressing and reconciling any findings are:
- The <<Insert Office Name, for example Student Financial Aid Office is responsible for financial aid findings. These findings are addressed by JP.
- The JP is responsible for all other findings <<Insert Findings and Appropriate Office Name, for example Student Credit Balance deficiencies – Student Accounts Office>>. JP << Insert Staff Title, for example the Director of the Business Office) refers the findings to the appropriate personnel.

The timeframe to respond to the audit findings is based upon the end date of the audit and the deadline(s) set by the auditor for producing the annual audit report. The JP is responsible for the coordination of the responses from the various departments of JP.

The <<Insert Office Name, for example the Accounting Office>> coordinates any repayments (as a result of liabilities) to ED to ensure completion within the designated timeframe. The Financial Aid Office is responsible for making repayments and adjustments to student files, if required.

External audit results and reports are reviewed and discussed with college Management and the <<Insert Appropriate Entity, for example Board of Trustees>> with appropriate corrective action taken on all audit comments.

Reviews of the records conducted by external auditors and monitors provide feedback and ensure JP financial reports are fairly presented in accordance with generally accepted accounting principles.

Monitoring activities include external audits designed to monitor internal controls applicable to financial, operational, and compliance objectives, and internal reviews at various management levels that monitor and report on integrity of information, effectiveness of operations, safeguarding of assets, and compliance with various governance.

17.3 FSA Compliance Audits

Policy

JP has an annual compliance audit done by an independent public accountant, JP according to GAGAS and the guidance contained in the Compliance Supplement or the appropriate audit guide.

JP is required to have audits performed under the guidelines of the Single Audit Act and the Compliance Supplement for 2 CFR Part 200 Subpart F, which has distinct auditing and submission requirements.

Institutions under the Single Audit Act have an audit submission deadline of the earlier of 30 calendar days after receipt of the audit report, or nine months after the end of the audit period. In addition, a copy of the audit as well as Data Collection Form SF-SAC must be submitted online to the Federal Audit Clearinghouse.

Procedure

<u>Performing the Audit</u>

JP must make its program and fiscal records, as well as individual student records, available to the auditor.

1. JP receives the date that an audit is to occur, along with a list of documents and student files that will need to be available during the on-site visit. These requests are forwarded to <<Insert Staff Title, for example Controller>>.
    a. Both the financial aid and business offices should be aware of the dates the auditors will be at JP receives the list of documents requested by the auditor, the JP gathers the required material and pulls the files that were requested. The Financial Aid Office uploads all the requested documents to the designated location managed by the <<Insert Office Name, for example the Controller’s Office).

2. JP is available throughout the audit process to respond to inquiries made by the auditors.
3. If audit findings are received from the auditor, JP will respond to the findings with a corrective action plan, if applicable.
4. At the end of the on-site review, the auditor conducts an exit interview. This exit interview is usually conducted with the personnel from JP financial aid and other relevant offices.
5. The final report is prepared by the auditor and submitted to JP.

<<Insert College Procedures>>

Review of FSA Audit Submissions
The U.S. Department of Education reviews the audit report for format and completeness and to ensure that it complies with the government's auditing standards.

The U.S. Department of Education uses the general information to initially determine whether the audits are materially complete and prepared in accordance with applicable accounting standards. Based on the financial data, they also make a preliminary determination whether JP is financially responsible. They determine whether JP must provide additional information or if they should take further action.

Based on the audit findings and JP written explanation, the U.S. Department of Education will determine if any funds were spent improperly. Unless JP has properly appealed the decision, it must repay any improperly spent funds within 45 days.

Access to Records
Throughout the audit process, and for other examinations such as program reviews and state reviews, JP is required to cooperate fully with its independent public accountant or a government auditor, the U.S. Department of Education and its inspector general, the Comptroller General of the United States, its accrediting agency, and the appropriate guaranty agency.

Once the audit is complete, JP must give the U.S. Department of Education and the OIG access to all records and documents needed to review the audit.

- An institution that uses a third-party servicer must give the U.S. Department of Education and the OIG access to all records and documents needed to review a third-party servicer's compliance or financial statement audit.
- In addition, JP contract with the auditor must specify that the auditor will give the U.S. Department of Education and the OIG access to the records and documents related to the audit, including work papers.

Cooperation includes providing timely and reasonable access to records (including computer records) for examination and copying and to personnel for the purpose of obtaining relevant information.

17.4 Audited Financial Statements

Policy

JP financial statements cover its most recently completed fiscal year and are prepared on an accrual basis in accordance with GAAP. It is audited by an independent public accountant, JP, according to GAGAS and the instructions in the guide appropriate for JP.

Annual financial statements are prepared in a manner consistent with the modified accrual method prescribed by <<Name of Entity>> <<Include Link>>.

The U.S. Department of Education uses information from the College's audited financial statements to evaluate the College's compliance with financial standards. The U.S. Department of Education may require that JP submit additional information.

JP financial statements are audited annually by an external audit firm, JP. The resulting financial reports and supplemental documents are published by the <<Insert Office Office, for example Finance Office). In addition, as an entity of the State of Washington, the College's financial statements are included in the JP.

Day-to-day operations form the foundation of JP financial reports. Due to the reporting requirements, all College personnel must behave in a fiscally responsible manner and record financial transactions in accordance with applicable rules and regulations.

Procedure

Preparing financial statements and communicating financial information are critical accounting functions. Financial statements reflect the current year's budget to actual comparisons.

The basic financial statements include:

1. Statement of Financial Position (Balance Sheet) - reflects assets, liabilities, and net assets of the organization and classifies assets and liabilities as current or non-current/long-term
2. Statement of Activities (Income Statement) - presents support, revenues, expenses, and other changes in net assets of the organization, by category of net asset (unrestricted, temporarily restricted, and permanently restricted)
3. Statement of Cash Flows (Development Sheet) - reports the cash inflows and outflows of the organization in three categories: operating activities, investing activities, and financing activities
4. Statement of Functional Expenses (Summarized by Program Totals) – presents the expenses of the organization in both a natural, or objective, format and by function (i.e., which program or supporting service was served)

JP must submit to the U.S. Department of Education a set of acceptable financial statements for its latest complete fiscal year (or such fiscal years as requested by the U.S. Department of Education), as well as any other documentation the U.S. Department of Education deems necessary to determine financial responsibility.

- For fiscal years beginning on or after July 1, 2024, financial statements submitted to the U.S. Department of Education must match the fiscal year end of the entity's annual return(s) filed with the IRS.
- Financial statements submitted to the U.S. Department of Education must include the Supplemental Schedule required under 34 CFR 668.172(a) and section 2 of appendices A and B to 34 CFR Part 668 Subpart L, and be prepared on an accrual basis in accordance with generally accepted accounting principles (GAAP), and audited by an independent auditor in accordance with generally accepted government auditing standards (GAGAS), issued by the Comptroller General of the United States and other guidance contained in 2 CFR part 200; or in audit guides developed by and available from the U.S. Department of Education's Office of Inspector General, whichever is applicable to the entity, and provided that the Federal student aid functions performed by that entity are covered in the submission.

<<Insert College Procedures>>

Frequency of Preparation
JP designated staff member prepares accurate financial statements in accordance with generally accepted accounting principles and distributes them in a timely manner. In meeting this responsibility, the following policies shall apply:

- A standard set of financial statements described in the preceding section shall be produced monthly, by the JP of each month.
- The monthly set of financial statements is prepared on the accrual method of accounting, including all receivables and accounts payable received by the JP of the month.
- All financial statements and applicable supporting schedules are reviewed and approved by JP.
- After approval by JP, a complete set of financial statements bi-monthly shall be prepared and distributed as follows: JP
  1. Treasurer and Finance Committee Members
  2. Executive Director
  3. Board of Directors>>

Related-Party Disclosures, 34 CFR 668.23(d)(1)
As part of the financial statements that JP is required to provide to the U.S. Department of Education, JP must include a detailed description of related entities based on the definition of a related entity as set forth in Accounting Standards Codification (ASC) 850.

The disclosure requirements under 34 CFR 668.23(d)(1) extend beyond those of ASC 850 to include all related parties and a level of detail that would enable the U.S. Department of Education to readily identify the related party. Such information must include, but is not limited to,

- The name, location, and a description of the related entity, including the nature and

- The amount of any transactions between the related party and JP, financial or otherwise, regardless of when they occurred.

If there are no related party transactions during the audited fiscal year, or related party outstanding balances are reported in the financial statements, management must add a note to the financial statements to disclose this fact.

Record Retention

JP retains records as required by law and destroys them when appropriate. The destruction of records is approved by the JP and logged into the Organization's Destroyed Records Log.

The formal records retention period for the following records is as follows:
<<Insert Applicable Documents/Retention Periods >>

Document	**Retention Period**
Accounts payable ledgers and schedules	7 Years
Accounts receivable ledgers and schedules	7 Years
Audit reports	Permanently
Bank reconciliations	2 Years
Bank Statements	3 Years
Chart of Accounts	Permanently
Cancelled Checks	7 Years
Contracts, mortgages, notes, and leases (expired)	7 Years
Correspondence: General (Customers, Vendors, etc.)	2 Years
Legal and important matters only	Permanently
Deeds, mortgages, and bills of sale	Permanently
Determination letter for income tax exemption	Permanently
Depreciation schedules	Permanently
Duplicate deposit slips	2 Years
Employment applications	3 Years
Expense analyses/expense distribution schedule	7 Years
Financial statements: Year-end	Permanently
Other Optional General ledgers/year-end trial balance	Permanently
Insurance policies (expired)	3 Years
Insurance records (polices, claims, etc.)	Permanently
Internal audit reports	3 Years
Internal reports	3 Years
Invoices (to customers, from vendors)	7 Years
Minute books of directors, bylaws, and charters	Permanently
Notes receivable ledgers and schedules	7 Years
Payroll records and summaries	7 Years
Personnel records (terminated)	7 Years

Property records (incl. depreciation schedules)	Permanently
Purchase orders: Purchasing department copy	7 Years
Purchase orders: Other copies	1 Year
Retirement and pension records	Permanently
Tax returns and worksheets, examination reports, and other documents relating to IRS determination	Permanently
Time sheets/cards	7 Years
Trademark registrations and copyrights	Permanently
Training manuals	Permanently
Withholding tax statements	7 Years

17.5 Direct Loan Quality Assurance

Policy

JP follows published guidelines for quality assurance regarding Direct Loans in the Financial Aid Office, following the published guidance by the U.S. Department of Education on November 13, 2013. The program,

- Identifies appropriate staff members within the financial aid office and other campus offices that will initiate and maintain the quality assurance system.
- Indicates which office(s) are responsible for reviewing and updating the process to ensure JP complies with the Direct Loan quality assurance component.
- Indicates where the information is located and when it was last reviewed and updated.

Procedure

The quality assurance process documents that JP is,

- Reporting loan records, disbursements, and adjustments to disbursements correctly to the Common Origination and Disbursement (COD) System.
- Disbursing and returning loan funds in accordance with regulatory requirements.
- Disbursing the correct loan amount to the correct student.
- Completing monthly reconciliation and Program Year Closeout.

JP may use any of the following reports available via the COD System to assist with evaluating the effectiveness of JP Direct Loan processes and procedures. Information about the various reports can be found in the 2024-2025 COD Technical Reference.

- COD School Monitoring Report (produced by the COD System)
- Direct Loan Booking Warning Report (produced by the COD System)
- Counseling Report (produced by the COD System)
- Actual Disbursement List (produced by the COD System)
- Pending Disbursement Listing (produced by the COD System)
- School Account Statement (SA) (produced by the COD System)
- SAS on Demand (produced by the COD System)
- Direct Loan processing reports and queries (produced from JP software system)
- Direct Loan Tools (DL Tools)
    - Direct Loan SAS Comparison Report

- COD website (school summary, financial information, funding information, cash activity, refunds of cash, and action query screens)

In addition, assistance can be found by reaching out to the COD customer service representative/reconciliation specialist with questions regarding COD data or system navigation.

Contact the FSA Partner and School Relations Center
Phone: 1-800-848-0976
Phone Support Hours: Monday - Friday: 10:00 A.M. to 6:00 P.M. Eastern Time Zone
Email: CODSupport@ed.gov
Address: U.S. Department of Education, P.O. Box 1130, Fairfax, VA 22038

Direct Loan Quality Assurance Process
34 CFR 685.300(B)(9)
Direct Loan – Activity 2
JP programs and its borrower population.

Reporting loan records, disbursements, and adjustments to disbursements correctly to the Common Origination and Disbursement (COD) System

- The Financial Aid Administrator (FAA) utilizes Oracle software product, PeopleSoft, colloquially referred to as ctcLink utilizes PeopleSoft to originate all Federal Direct Loans.
- PeopleSoft generates a disbursement roster and the <<Insert Office Name, for example Registrar>> verifies enrollment of the students on the list and provides approval to the <<Insert Office Name, for example Student Financials Office>> to draw down the funds; post credit to the student account (within three days); and refunds any excess payments (within fourteen days).

Measurable Assessment
- Ensuring all loan records maintain “Acceptable” status within our system until the end of the year closeout.
- Responding in a timely manner to COD School Monitoring Reports, COD 30 Day Warning Reports.
- Comparing the COD Pending Disbursement Reports and Actual Disbursement Reports with the system record.

Disbursing and returning loan funds in accordance with regulatory requirements

Disbursing:

- The FAA confirms the student has met Satisfactory Academic Progress (SAP) requirements and enrollment requirements.
- The FAA requests the disbursement using our system which utilizes COD integration.
- The FAA imports the approved and booked notification from COD into Peoplesoft.
- Our system generates the Disbursement Roster.
- The <<Insert Office Name, for example Student Financials Office
- >> initiated the draw down of funds in G5.
- The JPposts the credit to the student account (within three days); and refunds any excess payments (within fourteen days).

Returning:

- The system notifies the FAA of student enrollment status changes which may indicate a potential change in the FSA funds (the student may also notify the FAA).
- The FAA notifies the JPto return funds (to reduce a subsequent draw down from G5).
- The FAA reviews student accounts on a routine basis. In addition, our system alerts the FAA to issues affecting the student's FSA eligibility.

Measurable Assessment

- Ensuring all loan records maintain "Accepted" status within our system until the end of the year closeout.
- Monitoring the enrollment, SAP, and eligibility alerts within our system and responding appropriately.
- Responding in a timely manner to COD School Monitoring Reports, COD 30 Day Warning Reports.
- Comparing the COD Pending Disbursement Reports and Actual Disbursement Reports with the system records.

Disbursing the correct loan amount to the correct student

- The FAA schedules disbursement dates for approved funds.
- The JP uses that schedule to draw down funds from G5.
- Funds are applied to the student account (within three days); and refunds any excess payments (within fourteen days).

Measurable Assessment

- Ensuring all loan records maintain "Accepted" status within our system until the end of the year closeout.
- Monitoring the enrollment, SAP, and eligibility alerts within our system and responding appropriately.

- Responding in a timely manner to COD School Monitoring Reports, COD 30 Day Warning Reports.
- Comparing the COD Pending Disbursement Reports and Actual Disbursement Reports with system records.

Completing monthly reconciliation and Program Year Closeout

- The FAA received the SAS and works with the JP to create a monthly reconciliation document that shows balance between our system, COD and G5.

Measurable Assessment
- Maintaining timely and accurate monthly reconciliation records.
- Maintaining timely and accurate year-end closeout documentation.

17.6 Systems/Resources Used for Audit Standards
- 9.2 FA - Financial Aid Business Process Guides | ctcLink Reference Center

Section 18: Resources & Reference Documents

Some useful resources and reference documents, consisting of college websites, U.S. Department of Education (ED) publications/websites, and National Association of Student Financial Aid Administrators (NASFAA) websites (membership may be needed).

Consistent use of the **Resources and Reference Documents** section of a Financial Aid Policies & Procedures (P&P) manual is critical to ensuring accuracy, compliance, and operational consistency. By anchoring policies to current source documents—such as the Federal Student Aid Handbook, Dear Colleague Letters, Electronic Announcements, and state aid manuals—staff can confidently interpret and apply requirements, reduce reliance on institutional memory, and respond effectively to audits, program reviews, and staff turnover.

Regularly consulting and updating this section supports regulatory change management, promotes uniform decision-making, and demonstrates a proactive compliance culture where policies are not static documents, but living procedures aligned with governing authority.

College Resources: <<Insert College Resource & Reference Documents, you may separate this by college departmental resources for example, Financial Aid Office resources, Student Account Office Resources, Admissions Office Resource, etc.>>

- College Financial Aid Calendar
- College Disbursement Dates
- BankMobile Disbursement Process
- College CARES Act/Higher Education Emergency Relief Fund (HEERF)
- College Cost of Attendance and Eligibility
- College Frequently Asked Questions
- College Financial Aid Resources
- College Financial Literacy
- Financial Aid Council (FAC) Homepage

ctcLink Resources:

- ctcLink Enhancement Requests
- ctcLink Financial Aid Support
- ctcLink PeopleSoft Production Operations Dashboard
- ctcLink Point of Contact (PoC)
- ctcLink Reference Center FA Quick Links
- ctcLink Support eList (email listserv)
    - DirFinAid Listerv
- ctcLink Training
- Most Commonly Used Financial Aid ctcLink Queries

SBCTC/WSAC Related Resources:

- Financial Aid | WSAC
- Resources for Financial Assistance Administrators | WSAC

- Submit Fraud Report to SBCTC Business Operations

Common Origination and Disbursement (COD)

- System Technical Reference

NSLDS Resources

- User Resources
- Newsletter
- NSLDS Transfer Student Monitoring & Financial Aid History User Guide and Record Layouts (March 2026) (Updated April, 7, 2026)
- FVT/GE User Guide

Federal Student Aid Handbooks

- Current and Previous Years FSAHandbooks

FAFSA® Processing Specifications

- 2025-2026
  - FAFSA® Specifications Guide
  - FAFSA®® Specifications Guide Volume 6 – ISIR Guide
  - FAFSA®® Specifications Guide Volume 7 – Comment Codes
- 2026-2027
  - FAFSA® Specifications Guide
  - FAFSA®® Specifications Guide Volume 6 – ISIR Guide
  - FAFSA®® Specifications Guide Volume 7 – Comment Codes

NASFAA Resources

- One Big Beautiful Bill Act Web Center
- Monographs
- Quick Reference Guides
- Tip Sheets
- Aid Offer Comparison Worksheet
- AskRegs Service and Knowledgebase Q&As
- Comprehensive List of Consumer Information and Disclosure Requirements
- Compliance Engine
- Compiled Title IV Regulations
- FAFSA® Simplification Web Center
- Fresh Start Web Center
- How-to-Guides
- Title IV Eligibility Checklist: Considerations for Adding New Programs and Locations
- Self-Study Guides
- Verification Data and Federal Tax Forms Comparison
- Webinars

- Newsletters

Other Financial Aid Related Resources:

- Annual Unique Entity Identifier (UEI) registration renewal
- Audit Guide, Audits of Federal Student Financial Assistance Programs at Participating Institutions and Institution Servicers
- Clery Act Appendix for FSA Handbook
- Code of Federal Regulations (CFR)
- Cohort Default Rate Guide
- Common Manual Unified Student Loan Policy, Council on Higher Education Loan Programs
- Coronavirus Aid, Relief, and Economic Security (CARES) Act Information
- Dear Colleague/Partner Letters
- E-App Home Page
- E-App & Third-Party Servicer Inquiry Form Updates
- Electronic Announcements
- Electronic Data Exchange (EDE) Technical Reference (see FAFSA® Specifications Guide)
- ED Program Integrity Information - Questions and Answers
- 2017 Program Review Guide for Institutions
- FAFSA® Simplification Information
- FAFSA® Central
- FAFSA® Issue Alerts
- FAFSA® Pell Eligibility and Student Aid Index (SAI) Guide
- Federal Registers
- Federal Student Aid's What's New
- Federal Student Aid Training
- FISAP Technical Reference
- FSA Partner Connect Help Center
- Guide for Audits of Proprietary Schools and for Compliance Attestation Engagements of Third-Party Servicers Administering Title IV Programs
- Higher Education Emergency Relief Fund (HEERF) Information [Including HEERF I, HEERF II, and HEERF III]
- SAVE System Instructions for U.S. Department of Education (School) Users Version 4.0
- Student Aid Reference Desk
- Submit Fraud Report to OIG

Section 19: Acronyms & Glossary

Acronym	Term	Definition
ACA	Administrative Cost Allowance	A school participating in the Campus-Based Programs is entitled to an ACA for an award year if it provides employment under the FWS Program or awards grants under the FSEOG Program to students in an award year. The ACA may be used to help offset administrative costs.
ACH	Automated Clearing House	The primary system that agencies use for electronic funds transfer (EFT). With ACH, funds are electronically deposited in financial institutions, and payments are made online.
ADA	Americans with Disabilities Act	The Americans with Disabilities Act (ADA) is a federal civil rights law that prohibits discrimination against people with disabilities in everyday activities. The ADA prohibits discrimination on the basis of disability just as other civil rights laws prohibit discrimination on the basis of race, color, sex, national origin, age, and religion.
AEI	Additional Eligibility Indicator	Students may be eligible to receive up to 150% of their Pell Grant or Iraq & Afghanistan Service Grant (IASG) Scheduled Award for an award year. This provision is called Year-Round Pell/Year-Round IASG, or additional Pell/additional IASG. A student's additional aid eligibility is denoted by the "Additional Eligibility Indicator" or AEI in COD.
AGI	Adjusted Gross Income	An individual's adjusted gross income as reported to the Internal Revenue Service (IRS). The rules for calculating AGI are set by the IRS, not the Department.
APA	Asset Protection Allowance	The FAFSA® asset protection allowance excludes a certain amount of assets from the calculation of a student's Student Aid Index (SAI). The amount of the allowance varies based on factors such as parents' age and the student's dependency status.
ARN	Alien Registration Number (also known as A-number)	An identifying number assigned by Department of Homeland Security (DHS) to identify and keep track of individuals who have been or are in contact with the immigration process. Used by the U.S. Department of Education to verify the immigration status of noncitizens applying for federal student aid.

ASR	Annual Security Report	A report a participating school is required to compile and file annually with the Department that summarizes the school's compliance with the institutional security policies and crime statistics requirements of 34 CFR 668.46.
ATB	Ability to Benefit	Students may become eligible for Title IV aid through the ATB alternatives in one of two ways: 1. If a student first enrolled in an eligible postsecondary program **prior to July 1, 2012** (regardless of receipt of any Title IV aid), the student may enroll in any eligible program and can become eligible through one of the ATB alternatives. 2. If a student first enrolled in an eligible postsecondary program **on or after July 1, 2012**, the student may only become eligible through one of the ATB alternatives if the student is enrolled in an eligible career pathway program. See below for more details about eligible career pathway programs. An ATB student need not be enrolled concurrently in both the eligible postsecondary program and the component for attaining a high school diploma or its recognized equivalent.
AVG	Application and Verification Guide	A guide intended for college financial aid administrators and counselors who help students with the financial aid process and completing the Free Application for Federal Student Aid (FAFSA®) form, verifying information, and making corrections and other changes to the information reported on the FAFSA® form.
AY	Academic Year	An academic year is the period of time in which a student completes a defined number of credit or clock hours and instructional weeks, as established by the institution for the purpose of measuring educational progress. For federal financial aid purposes, the academic year must meet minimum requirements defined by the U.S. Department of Education (generally at least 30 weeks of instructional time for credit-hour programs and a minimum number of credit or clock hours, depending on the program type). The academic year is used to determine

		loan eligibility, annual loan limits, and satisfactory academic progress evaluation periods.
AY	Award Year	An award year is the federal financial aid cycle that runs from July 1 of one calendar year through June 30 of the following calendar year. It is the period for which a student applies for and may receive federal student aid based on a specific FAFSA®. For example, the 2026–2027 award year includes aid awarded for payment periods beginning on or after July 1, 2026, and ending on or before June 30, 2027. The award year is used to determine aid eligibility, applicable regulations, and annual funding limits for federal financial aid programs. Schools have the option to designate the summer term as either a header or trailer for the award year. **Header Semester:** The first term of the academic year, typically summer, which precedes the fall semester and is considered the beginning of the financial aid award year. **Trailer Semester:** The final term of the academic year, typically summer, which follows the spring semester and concludes the financial aid award year.
BBAY	Borrower-Based Academic Year	An academic year standard that may be used to measure Direct Loan annual loan limit progression (i.e., when a borrower becomes eligible for a new annual loan limit). Unlike a Scheduled Academic Year (SAY), a BBAY follows an individual student's academic progress and does not begin and end at the same time each year.
BFET	Basic Food Education and Training	Offered through the Department of Agriculture's Food and Nutrition Service (FNS), the Basic Food Employment and Training (BFET) program is another means by which the State Board for Community and Technical Colleges (SBCTC) facilitates access to federal workforce education and training dollars to enable basic food recipients to gain the skills necessary for employment. The target population is basic food recipients, not currently on TANF.
CAP	Corrective Action Plan	Statement of the corrective actions related to noncompliance, to include a responsible official,

		milestones toward completion of the action, metrics that measure progress and remediation, and dates when these milestones will be addressed. CAPs are to be maintained by the organization, and the status is to be reported as directed.
CB	Campus-Based Programs	Federal student aid programs under which funds are provided to participating institutions for awards to eligible students. The Campus-Based Programs include the Federal Perkins Loan Program, the Federal Work-Study (FWS) Program, and the Federal Supplemental Educational Opportunity Grant (FSEOG) Program. (Note: The authority for institutions to make new Federal Perkins Loans ended effective September 30, 2017.)
CBS	College Bound Scholarship	Eligible College Bound students who fulfill the program requirements get free public college tuition, or an equivalent amount for an approved private college or career school.
CDR	Cohort Default Rate	The number of students in a cohort who default on their loans during a fiscal year divided by the total number of students in the cohort, expressed as a percentage.
CFH	Child of Fallen Heroes Scholarship Act	Under the CFH Act, an otherwise Pell-eligible student whose parent or guardian died as a result of active service in the line of duty as a Public Safety Officer (defined under 42 U.S.C. 3796b, or a fire police officer) may receive the maximum Pell Grant and increased amounts of other federal student aid if the student was less than 24 years old when the parent or guardian died, or was enrolled at an institution of higher education at the time of the parent or guardian's death.
CFL	Current Funding Level	The total amount of cash available for a school to draw down at any point in time is a subset of the school ceiling amount (SCA). A school's current funding level may be adjusted based on the amount of substantiated cash. A change in CFL will directly impact the SCA. In G5, the CFL is called the Authorization.
CFR	Code of Federal Regulations	The codification of the rules published in the Federal Register by agencies of the federal government. Each volume of the CFR is updated once each calendar year and issued quarterly.

		The volume for Education, Title 34, is updated on July 1 of each year. Cited as "34 CFR."
CIP	Classification of Instructional Programs	A taxonomic scheme that supports accurate tracking and reporting of fields of study and program completion activities. (CIP user site)
COA	Cost of Attendance	The cost in dollars for a period of enrollment (such as an academic year). The COA for a student is an estimate of that student's educational expenses for the period of enrollment. Defining a student's COA is the first step in establishing a student's federal student aid package. It sets the limit on the total federal student aid a student may receive. For a detailed explanation of the components included in Cost of Attendance, see the Higher Education Act, as amended, Part F, Section 472.
COD	Common Origination and Disbursement	The system is used to process records for the Pell Grant, TEACH Grant and Direct Loan programs.
CPS/SAIG	Central Processing System/Student Aid Internet Gateway	Vendor and system designed by the U.S. Department of Education for viewing or correcting SAR information, requesting or analyzing ISIR data, and calculating and managing the return of federal student aid program funds.
CTC	Community and Technical Colleges	Each year, about 307,000 students train for the workforce, prepare to transfer to a university, gain basic math and English skills, or pursue continuing education. Students, graduates, and community partners increase the state's quality of life and economic vitality as entrepreneurs, employees, consumers, and taxpayers.
ctcLink	ctc (Community and Technical Colleges)	ctcLink is an enterprise-resource-planning (ERP) system (built on Oracle PeopleSoft) used by the public community and technical colleges in Washington state.
DCL	Dear Colleague Letter	An ad hoc publication by the U.S. Department of Education addressing significant policy, system, and training issues and intended for college financial aid administrators and other customers.
DHS	Department of Homeland Security	The Department of Homeland Security (DHS) is a U.S. federal executive department responsible for safeguarding the country against terrorist attacks and ensuring preparedness for natural disasters and other emergencies. Its work includes customs, border, and immigration

		enforcement, emergency response, antiterrorism efforts, and cybersecurity.
DL	William D. Ford Federal Direct Loan Program	A federal student loan program under which eligible students and parents borrow directly from the U.S. Department of Education at participating schools. Loans include Direct Subsidized, Direct Unsubsidized, Direct PLUS, and Direct Consolidation Loans.
DOB	Date of Birth	The day, month, and year that an individual was born. This information is essential for various official documents, such as passports and birth certificates. It is often requested on forms and applications to verify identity or age.
DOD	Date of Determination	The date when an institution determines that a student has ceased attendance.
DOD	Department of Defense	The United States Department of Defense is an executive department of the U.S. federal government charged with coordinating and supervising the six U.S. armed services: the Army, Navy, Marines, Air Force, Space Force, and the Coast Guard, for some purposes, and related functions and agencies.
DOJ	Department of Justice	The Department of Justice (DOJ) is a federal executive department of the U.S. government responsible for overseeing the enforcement of federal laws and the administration of justice. Its primary functions include prosecuting criminal and civil cases, managing federal law enforcement agencies, and upholding civil rights.
DPA	Destination Point Administrator	The school employee is responsible for ensuring secure access to the SAIG (a communication system between the school and ED systems). The DPA is responsible for assigning and providing access via SAIG for other employees of the school.
DRI	Disbursement Release Indicator	A "tag" on the Common Record that designates a record as an Actual Disbursement Record. It signals the COD System to post the disbursement amount to an award (loan/grant).
DRT	IRS Data Retrieval Tool	The feature that allows students and parents who are using FAFSA® on the Web and who have already submitted their federal tax return to electronically retrieve certain tax data from the IRS database for entry on their FAFSA®.
DRN	Data Release Number	A four-digit unique student identifier that schools may use in combination with an applicant's

		identifying information to access the student's record if the school was not listed on the Free Application for Federal Student Aid (FAFSA®).
EA	Electronic Announcement	A communication tool used to convey guidance regarding the Title IV federal student aid programs. These announcements serve as primary resources for informing stakeholders about important updates, policies, and procedures related to student financial aid.
EAG	Early Achievers Grant	The Early Achievers Grant is a student financial aid program to help employed childcare providers and early learning educators complete certificates and associate degrees in early childhood education.
E-APP	Electronic Application Approval to Participate	Used by postsecondary institutions to apply for designations, initial participation, recertification, and other updates.
ECAR	Eligibility and Certification Approval Report	A summary of an institution's eligibility/certification information (Title IV program participation, institution's accreditor, state authorization, staff, additional locations, and eligible vocational programs).
ECPP	Eligible Career Pathway Program	An Eligible Career Pathway Program is a program that combines rigorous and high-quality education, training, and other services that: 1. Align with the skill needs of industries in the economy of the state or the regional economy involved. 2. Prepare an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937 (commonly known as the National Apprenticeship Act; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.). 3. Include counseling to support an individual in achieving the individual's education and career goals. 4. Include, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster. 5. Organize education, training, and other services to meet the particular needs of an individual in a manner that accelerates the

		educational and career advancement of the individual to the extent practicable. 6. Enable an individual to attain a high school diploma or its recognized equivalent, and at least one recognized postsecondary credential, 7. Help an individual enter or advance within a specific occupation or occupational cluster.
ED	United States Department of Education	A federal agency responsible for establishing national education policy, administering federal assistance to education, and coordinating educational programs.
EDE	Electronic Data Exchange	An electronic exchange system between the central processor and an institution under which • A student is able to transmit his or her application information to the central processor through his or her institution, and an ISIR is transmitted back to the institution. • A student through his or her institution is able to transmit any changes in application information to the central processor; and • An institution is able to receive an ISIR from the central processor for a student.
EFT	Electronic Funds Transfer	Generic term describing any transfer of funds between parties or depository institutions through electronic data systems.
EIN	Employer Identification Number	An identifying number issued by the IRS to businesses for tax filing purposes. The EIN preceded by the letters "ED" is the password for accessing the Electronic Application (e-App) that schools use to apply for and update institutional FSA eligibility.
e-Sign	Electronic Signatures in Global and National Commerce Act	Enacted on June 30, 2000, the E-Sign Act provides, in part, that a signature, contract, or other record relating to a transaction may not be denied legal effect, validity, or enforceability solely because it is in electronic form, or because an electronic signature or electronic record was used in its formation. Voluntary consent to participate in electronic transactions is required for all financial information provided or made available to student loan borrowers, and for all notices and authorizations to FSA recipients required under 34 CFR 668.165.
ESL	English as a Second Language	English as a Second Language program. Students enrolled in a program consisting solely

		of ESL instruction are eligible for FSA funds only from the Pell Grant program.
eZ Audit	eZ Audit	A web application designed by the U.S. Department of Education that provides schools with a paperless, single point of submission for financial statements and compliance audits required by Title IV participants.
FAA	Financial Aid Administrator	A professional who helps students and their families navigate the financial aid process. They are responsible for administering financial aid programs, including grants, scholarships, and loans, and providing counseling and guidance to students and families about the financial aid process.
FA-DDX	Financial Aid Direct Data Exchange	A process that allows the Department of Education to exchange federal tax information directly with the IRS for the Free Application for Federal Student Aid (FAFSA®).
FADL	Final Audit Determination Letter	The written notice of a determination issued by a designated Department official based on an audit of • An institution's participation in any or all of the Title IV, HEA programs; or • A third-party servicer's administration of any aspect of an institution's participation in any or all of the Title IV, HEA programs.
FAFSA®	Free Application for Federal Student Aid	The student aid application is provided under section 483 of the HEA, which is used to determine an applicant's eligibility for the federal student aid programs. See *Student Aid Application*.
FAIN	Federal Award Identification Number	A unique identifier assigned by a federal agency to each financial assistance award, such as grants or cooperative agreements. It is used for tracking and monitoring federal funds, ensuring compliance with regulations, and facilitating financial reporting and audits.
FCSWS	Federal Community Service Work-Study	Services that are identified by an institution of higher education through formal or informal consultation with local nonprofit, government, and community-based organizations, as designed to improve the quality of life for community residents, particularly low-income individuals, or to solve particular problems related to their needs. In order to be considered community

		service, the job has to be in an area that is open, accessible, and used by the community at large. For a more detailed list of community services, see 34 CFR 675.2.
FERPA	Family Educational Rights and Privacy Act	The law sets limits on the disclosure of personally identifiable information from school records and defines the rights of the student to review the records and request a change to the records. FERPA generally gives postsecondary students the right to • Review their education records, • Seek to amend inaccurate information in their records, and • Provide consent for the disclosure of their records.
FFEL	Federal Family Education Loan Program	The Federal Family Education Loan (FFEL) Program was a program that worked with private lenders to provide education loans guaranteed by the federal government. The FFEL Program ended in 2010. All loans are now made through the Direct Loan Program.
FISAP	Fiscal Operations Report and Application to Participate	An electronic application through which schools provide information on Campus-Based expenditures made during the award year just completed and apply for funds in the Campus-Based Programs in the upcoming award year.
FOTW	FAFSA® on the Web	The online version of the FAFSA® and the website where it is accessed.
FPRD	Final Program Review Determination	The letter from the Department follows an institution's response to the Program Review Report (PRR). The FPRD informs the institution of ED's final determination regarding each of the findings in the PRR and identifies liabilities, if any; provides instructions for payment of liabilities; notifies the institution of its right to appeal the existence of and amount of liabilities; and closes the program review if appropriate.
FPS	FAFSA® Processing System	A crucial component of the FAFSA® process, responsible for processing FAFSA® applications and determining eligibility for federal student aid. The FPS compares the data submitted by applicants with information from other government agencies to assess financial need

		and determine the appropriate level of financial aid.
FSA	Federal Student Aid	Federal student aid is aid from the government in the form of grants, loans, and/or work-study funds to assist students with college or career school.
FSA Training Center	Federal Student Aid Training Center	A comprehensive, online introductory course on school requirements for administering the FSA programs. Available at https://fsatraining.ed.gov/.
FSAIC	Federal Student Aid Information Center	Serves the public by providing information, in both English and Spanish, about the FSA programs and the application process. Customers include students, parents, and financial aid administrators seeking general information about federal grant and loan programs and specific assistance with the FAFSA®. 800/4-FED-AID (800-433-3243); 334-523-2691; TDD/TTY 800-730-8913 for the deaf or hearing impaired.
FSA ID	Federal Student Aid ID	An FSA ID is an account username and password combination that gives access to U.S. Department of Education online systems and can serve as a legal signature when completing electronic documents.
FSATC	Federal Student Aid Training Conference	A national training conference, hosted by FSA, is held every year in November/December.
FSEOG	Federal Supplemental Educational Opportunity Grant	The Federal Supplemental Educational Opportunity Grant (FSEOG) is a grant that is awarded to an undergraduate student who demonstrates exceptional financial need to help pay for their education. Awards can range from \$100–\$4000 and don’t need to be repaid.
FSS	FAFSA® Submission Summary	Formerly known as the *Student Aid Report* (SAR), it can tell the student about their financial aid eligibility, potential schools, making corrections or changes to their FAFSA® form, and next steps.
FTI	Federal Tax Information	A category of sensitive personal and financial details collected and maintained by government entities. This information is crucial for determining income, eligibility, and income-driven repayment plan options through the FAFSA® process. FTI includes details such as tax filing status, adjusted gross income (AGI), number of exemptions, number of dependents, and income earned from work.

FVT/GE	Financial Value Transparency/Gainful Employment	Legislation aimed at creating a transparency and accountability framework for career programs. It requires the U.S. Department of Education to assess whether these programs prepare students for gainful employment in recognized occupations. The Act includes reporting requirements for institutions, mandating them to provide financial aid data and enrollment information, which will help assess the value of the programs and their impact on students' earnings.
FWS	Federal Work Study	Federal Work-Study provides part-time jobs for undergraduate and graduate students with financial need.
FY	Fiscal Year	A fiscal year is a 12-month accounting period used by a higher education institution for budgeting, financial reporting, and reconciliation of all institutional funds, including financial aid. The fiscal year does not have to align with the calendar year.
G5	G5	G5 is a delivery system that supports program award and payment administration.
GED	General Education Development certificate or General Equivalency Diploma	An alternative credential for individuals who did not complete a traditional high school education. It certifies academic knowledge equivalent to a high school diploma and serves as a pathway for further education and employment opportunities.
GPA	Grade Point Average	A cumulative measure of a student's grades over time, where the grades have been converted to a numerical scale.
HEA	Higher Education Act	Federal legislation passed in 1965, with amendments and reauthorizations subsequently passed, authorizing federal postsecondary student financial aid programs and mandating that the programs be regulated and administered by the U.S. Department of Education.
HCM	Heightened Cash Monitoring	There are two payment methods (Heightened Management and Reimbursement) and three levels of heightened cash monitoring—Heightened Cash Monitoring 1 (HCM1), Heightened Cash Monitoring 2 (HCM2), and Reimbursement, through which the Department more closely monitors the expenditure of federal funds by schools whose policies and procedures have been called into question.

IASG	Iraq and Afghanistan Service Grant	A grant for students whose parent or guardian died as a result of military service performed in Iraq or Afghanistan after the events of 9/11. Under the new law (2024-25 onward), students who formerly would have gotten IASG are now eligible for the maximum Pell Grant. Also, students who got IASG in 2023-24 and met disbursement requirements may continue to get Pell under "legacy" eligibility.
IFAP	Information for Financial Aid Professionals (website)	The Federal Student Aid website was replaced by the Knowledge Center on Federal Student Aid's fsapartners.ed.gov website. The Knowledge Center provides information to financial aid professionals about the Title IV federal programs.
IHE	Institution of Higher Education	One of three types of institutions eligible for participation in the Federal Student Aid programs. The others are a *proprietary institution of higher education* and a *postsecondary vocational institution*. For more information, see 34 CFR 600.4.
IRS	Internal Revenue Service	A bureau in the U.S. Department of the Treasury. It is responsible for collecting taxes and the interpretation and enforcement of the Internal Revenue Code.
IPA	Income Protection Allowance	The Income Protection Allowance (IPA) is a component of the Student Aid Index (SAI) used in financial aid calculations for students. It is designed to account for modest living expenses and is included in the SAI calculation to reflect the financial needs of a family. Typically, approximately 30% of the IPA is allocated for food, 22% for housing, 9% for transportation, 16% for clothing and personal care, 11% for medical care, and 12% for other family consumption.
IPEDS	Integrated Postsecondary Education Data System	The system is maintained by the Department's National Center for Education Statistics. Via the IPEDS website, schools report their graduation, completion, and transfer-out rates.
ISIR	Institutional Student Information Record	An electronic record that the Department transmits to an institution, including an applicant's FAFSA® information, personal identification information, and SAI.
ITIN	Individual Taxpayer Identification Number	A 9-digit number the IRS issues if you need a U.S. taxpayer identification number for federal tax

		purposes, but you aren't eligible for a Social Security Number (SSN).
LDA	Last Date of Attendance	Refers to the last date in a semester that a student was engaged in an academically related activity. This date is important for documenting attendance records and can affect financial aid and grading.
LEU	Lifetime Eligibility Used	The sum of all annual Eligibility Used (EU) percentages for Pell Grant and Iraq and Afghanistan Service Grant recipients. The maximum a student may receive is the equivalent of 12 full-time semesters, or 6 scheduled awards (600%). The COD system tracks a student's Pell LEU percentage.
LOA	Leave of Absence	For Return of Title IV Funds purposes, a temporary interruption in a student's program of study that meets the requirements of 34 CFR 668.22(d). A school is not required to treat a leave of absence as a withdrawal if it is an approved leave of absence.
MFA	Multi-Factor Authentication	A security process that requires two or more types of verification to access a system.
MFI	Median Family Income	A statistical measure that represents the middle value of family incomes within a specific geographic area. Half of the families in that area earn more than the median, and half earn less.
MPN	Master Promissory Note	A promissory note that can be used to make one or more loans for one or more academic years (up to 10 years). An MPN lists the terms and conditions under which the borrower agrees to repay the loan and explains the borrower's rights and responsibilities.
Neg. Reg	Negotiated Rulemaking	Section 492 of the Higher Education Act (HEA) requires that, before publishing any proposed regulations to implement programs under Title IV of the HEA, the Department obtain public involvement in the development of those proposed regulations. *Negotiated Rulemaking* is the process the Department uses to obtain input from organizations and groups that represent the interests significantly affected by the proposed regulations.
NIST	National Institute of Standards and Technology	A measurement standards laboratory, which is a non-regulatory agency of the United States Department of Commerce. The institute's mission is to promote U.S. innovation and institutional

		competitiveness by advancing measurement science, standards, and technology in ways that enhance economic security and improve quality of life.
NPRM	Notice of Proposed Rulemaking	Proposed regulations that are published in the Federal Register with an invitation for the public to submit comments during a specified comment period.
NSC	National Student Clearinghouse	The source for trusted, authenticated, and secure education data insights.
NSLDS	National Student Loan Data System	The Department of Education's central database for student financial aid. It contains student-level data on recipients of Title IV loans and grants. Located on the web at https://nsldsfap.ed.gov/nslds_FAP/
OBBBA (OB3)	One Big Beautiful Bill Act	The One Big Beautiful Bill Act of 2025 aims to significantly reform education funding and student loan systems, impacting federal student aid and repayment plans.
OFA	Other Financial Assistance (formerly EFA)	Beginning in the 2024-25 award year, the FAFSA® Simplification Act replaces the term "Estimated Financial Assistance" (EFA) with "Other Financial Assistance" (OFA). Similar to EFA, OFA refers to the scholarships, grants, loans, and other assistance known to your school at the time that the student's aid was packaged. Historically, EFA was used as part of the formula for calculating the need for Title IV aid by subtracting it from the cost of attendance. Under the FAFSA® Simplification Act, the formula for determining a student's need for Title IV aid remains the same, except that EFC has been replaced by SAI and EFA has been replaced with OFA: **Need = Cost of Attendance (COA), minus SAI, minus OFA**.
OIG	Office of the Inspector General	An office within the U.S. Department of Education. Within the office, *Investigation Services* (IS) is responsible for all investigative activities relating to the Department's programs and operations and the prevention and detection of fraud and abuse in these programs and operations.

OPE ID	Office of Postsecondary Education Identification Number	An eight-digit number assigned to an institution upon approval to participate in Federal Student Aid programs. It is used throughout multiple systems to identify a school entity (the first six digits) and its individual locations (the last two digits).
PEP	Prison Education Program	Provides educational opportunities to incarcerated individuals, aiming to reduce recidivism and improve post-release employment prospects.
PII	Personally Identifiable Information	PII means information that can be used to distinguish or trace an individual's identity, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. Some information that is considered to be PII is available in public sources such as telephone books, public websites, and university listings. This type of information is considered to be Public PII and includes, for example, first and last name, address, work telephone number, email address, home telephone number, and general educational credentials. The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual can be identified. Non-PII can become PII whenever additional information is made publicly available, in any medium and from any source that, when combined with other available information, could be used to identify an individual.
PJ	Professional Judgement	Professional Judgment refers to the authority granted by the U.S. Department of Education to financial aid administrators to make case-by-case adjustments to a student's financial aid data values or dependency status due to special or unusual circumstances that are not reflected on the FAFSA®.
PLUS	Direct PLUS Loan	Direct PLUS Loans are federal loans that graduate or professional students (ending in 2026) and parents of dependent undergraduate students use to help pay for education expenses.
PPA	Program Participation Agreement	The agreement between the U.S. Department of Education and a school that affirms the school

		has been approved to participate in the federal student aid programs.
PWD	Post-Withdrawal Disbursement	A post-withdrawal disbursement (PWD) is a financial process that occurs when a student withdraws from a college or university and has earned more federal financial aid than was disbursed for the payment period.
PWL	Post-Withdrawal Letter	A written notice that a school must send to a student (or parent for a PLUS loan) after the student withdraws from school, when the student is entitled to Title IV aid that was not disbursed before withdrawal.
R2T4	Return to Title IV Funds	The calculation required when a recipient of Title IV aid withdraws from an institution during a payment period/period of enrollment in which the recipient began attendance. The calculation compares the amount of Title IV aid the recipient earned to the amount disbursed and determines whether funds must be returned, or the student is eligible for a post-withdrawal disbursement.
SAI	Student Aid Index (formerly EFC)	The SAI is an evaluation of the financial resources that may be available to contribute toward a student's education expenses. The EFC was calculated according to a formula specified in the law, and the SAI is likewise calculated according to formulas laid out in the FAFSA® Simplification Act. These formulas use information that applicants provide on their FAFSA® form, and, in most cases, federal tax information (FTI) that is retrieved directly from the IRS.
SAIG	Student Aid Internet Gateway	The internet-based tool that allows Federal Student Aid trading partners to securely exchange batch data with Federal Student Aid Application Systems. Through SAIG, organizations are eligible to enroll to exchange and access data with: • CPS (ISIR batch data, FAA Access to CPS Online services) • COD (Exchange Direct Loan, Pell, Iraq Afghanistan Service Grant, TEACH Grant batch data, COD Online services) • FISAP (eCampus-based access) • NSLDS (Enrollment Rosters, Electronic Cohort Default Rate (eCDR), NSLDS Online services)

		• FMS (Lender Reporting System/Guaranty Agency Financial Reports) • CSB (Direct Loan Delinquency Reports, Borrower Services)
SAM	System for Award Management	A website operated by the General Services Administration's (GSA) Office of the Integrated Award Environment (IAE) that consolidates Central Contractor Registration (CCR), Online Representations and Certifications Application (ORCA), Federal Agency Registration (FedReg), and Excluded Parties List System (EPLS). An active SAM account is needed to submit an application for a federal grant, receive and manage federal funds, or register as a vendor or federal contractor.
SAP	Satisfactory Academic Progress	The process a school uses to determine if a student is meeting all of his or her educational requirements and is on target to graduate on time with a degree or certificate.
SAR	Student Aid Report	A report provided to an applicant by the Department showing the applicant's FAFSA® information and eligibility for federal student aid. SARs are the paper or electronic (eSAR) output documents that are sent to students or printed from the FAFSA® on the Web and the FAA Access to CPS Online websites. SARs and ISIRs contain the same processed student information in different formats.
SAS	School Account Statement	The SAS is similar to a bank statement and gives the Department's official cash balance as of the end date of the reported period, based on data submitted by the school. It also gives detailed cash, loan, and disbursement transactions for that reported period.
SAVE	Systematic Alien Verification for Entitlements System	DHS and the U.S. Department of Education collaborated to design and implement this system for schools to submit third-step verification requests and to check students' eligibility for Title IV aid. A unique SAVE user ID was issued to the Primary Destination Point Administrator (PDPA) at each school to access the SAVE system. If the student's immigration documentation appears to support an eligible noncitizen status, or if the school has conflicting information after

		receiving a secondary match result, the school must complete a third-step verification request through the SAVE system.
SAY	Scheduled Academic Year	A traditional academic year calendar as published in a school's catalogue or other materials. An SAY is a fixed period of time that begins and ends at a fixed time and is used to measure the Direct Loan annual loan limit progression.
SBCTC	Washington State Board for Community and Technical Colleges	The Washington State Board for Community and Technical Colleges - led by a nine-member governor-appointed board - advocates, coordinates, and directs Washington state's system of 30 public community and technical colleges.
SE9W		A credit-hour program that has nonstandard terms, in which all terms are substantially equal in length, and each term is at least 9 weeks in length.
SEAG	Student Emergency Assistance Grant	The SEAG program allows community and technical colleges to provide monetary assistance to students experiencing unforeseen emergencies or situations that affect the student's ability to remain enrolled in their classes.
SIS	Student Information System	A software application specifically designed to manage student-related data in educational institutions. It serves as a core system of record (SOR) for higher education institutions and supports routine administrative and academic activities.
SOR	System of Record	An authoritative source of data that contains information about students. This includes details such as the individual's education, financial transactions, or employment history, and often contains the individual's identifying number, symbol, or other identifier assigned to the individual.
SPD	School Participation Division	Responsible for ensuring that institutions of higher education comply with the requirements of the Federal Student Aid (FSA) programs. This division handles the application process for institutions to participate in the FSA programs, including the Application for Approval to Participate in the Federal Student Financial Aid Programs (E-App). It also provides support and

		oversight to ensure that institutions meet the necessary academic, financial, and administrative standards.
SSEH	Supporting Students Experiencing Homelessness	Participating in community and technical colleges may implement programs to assist students experiencing homelessness and those who were in foster care at the time of high school completion.
SSN	Social Security Number	A nine-digit number issued to U.S. citizens, permanent residents, and temporary (working) residents. Applicants submitting a FAFSA® must have a valid Social Security Number. SSNs are matched with the Social Security Administration. Students from the Freely Associated States do not usually have SSNs but may receive some forms of aid. See *Freely Associated States* for more information.
SUB	Direct Subsidized Loan	A Direct Subsidized Loan is a federal student loan where a borrower isn't generally responsible for paying interest while in an in-school, grace, or deferment period.
SULA	Subsidized Usage Limit Applies (in the DL Program)	The Subsidized Usage Limit (SULA) was a federal regulation that limited first-time borrowers' eligibility for Direct Subsidized Loans to a period not exceeding 150% of the length of their educational program.
SWS	State Work Study	State Work-Study is a form of financial aid for low- and middle-income students. Qualifying students get an approved job, on- or off-campus, to support their education.
T1	Tier One Arrangement	A financial contract between a school located in a state that has a contract with a third-party servicer under which 1. The servicer performs one or more of the functions associated with processing direct payments of Title IV, HEA program funds on behalf of the institution; and 2. The school or third-party servicer makes payments to— • One or more financial accounts that are offered to students under the contract; • A financial account where information about the account is communicated directly to students by the third-party servicer, or the institution on behalf of or in conjunction with the third-party servicer; or

		A financial account where information about the account is communicated directly to students by an entity contracting with or affiliated with the third-party servicer.
T2	Tier Two Arrangement	A financial contract between a school located in a state and a financial institution, or entity that offers financial accounts through a financial institution, under which financial accounts are offered and marketed directly to students enrolled at the institution.
TANF	Temporary Assistance for Needy Families	Temporary Assistance for Needy Families (TANF) is a federally funded, state-run program. Also known as welfare, TANF helps families pay for: - Food - Housing - Home energy - Childcare
TEACH	Teacher Education Assistance for College and Higher Education	A grant program authorized by Title IV of the HEA under which grants are awarded by an institution to students who are completing, or intending to complete, coursework to begin a career in teaching and who agree to serve for not less than four years as a full-time, highly qualified teacher in a high-need field in a low-income school. If the recipient of a TEACH Grant does not complete four years of qualified teaching service within eight years of completing the course of study for which the TEACH Grant was received or otherwise fails to meet the requirements of 34 CFR 686.12, the amount of the TEACH Grant is converted to a Direct Unsubsidized Loan that the recipient must repay in full, with interest charged from the date of each TEACH Grant disbursement.
TFA	Two-Factor Authentication (2FA)	Two-factor authentication enhances account security by requiring two forms of identification: something you know (e.g., a password) and something you have (e.g., a phone or authenticator app).
TPD	Total and Permanent Disability Discharge	Relieves the borrower from having to repay their federal student loan(s) and/or complete their TEACH Grant service obligation.
TSM	Transfer Student Monitoring	Process through which schools send student information to NSLDS, so the schools can be

		notified of relevant changes to a student's financial aid history and eligibility.
UEH	Unusual Enrollment History	A field in NSLDS that alerts schools to a pattern of enrollment and/or award history for either Pell Grants or Direct Loans that is unusual. Depending on the UEH flag (possible values include “N”, “2”, and “3”), schools may be required to check the student’s academic records and take remedial action. If a student cannot provide compelling documentation for a failure to receive academic credit for periods in which they received Title IV funds, the student may lose Title IV eligibility. For more details, see Volume 1, Chapter 3 of the FSA Handbook.
UEI	Unique Entity Identifier	A randomly generated alphanumeric code assigned to entities that register with the System for Award Management (SAM). It serves as a universal identifier for organizations seeking to do business with the federal government, including contractors and grant recipients.
UNSUB	Direct Unsubsidized Loan	An unsubsidized loan through the Direct Loan Program offers students a low, fixed interest rate and flexible repayment terms. It’s not based on financial need.
URR	Unit Record Report	The Unit Record provides data about Washington students who receive need-based financial aid. Every college that participates in the Washington College Grant program is required to complete the Unit Record Report at the end of each fiscal year.
USCIC	U.S. Citizenship and Immigration Services	Responsible for processing immigration and naturalization applications, establishing policies regarding immigration services, and ensuring the integrity of the immigration system. USCIS provides various services, including citizenship applications, green card processing, and other immigration-related forms and resources.
VA	U.S. Department of Veterans Affairs	VA offers benefits that can help Veterans buy, retain, or modify a home; earn a degree; start a career; stay healthy, and do much more in life after the military.
VNF	Verification of Non-Filing	An official letter, from the IRS or other relevant tax authority, which confirms that the purported non-filer has not filed for that year. This letter must be submitted to the school for all non-tax filers except dependent students. If the student,

		spouse, or parents were not required to file a tax return, the student should still report any income earned from work on the FAFSA® (see the AVG, Chapter 4).
WASFA	Washington Application for State Financial Aid	The Washington Application for State Financial Aid (WASFA) is for people who choose not to file a federal FAFSA® application. If the student has completed the FAFSA®, they have already applied for federal and state financial aid and do not need to complete the WASFA unless the college requires it.
WCG	Washington College Grant	Washington College Grant (WA Grant) gives eligible people more money for more types of education, like certificate programs, job training, apprenticeships, or college.
WG-A	Washington College Grant Apprenticeships	The WA Grant for Apprenticeship includes funding for qualified apprentices in a variety of programs in Washington. Eligible apprentices can receive money to cover costs associated with their apprenticeship program.
WRT	Worker Retraining	The Worker Retraining program can help pay for training expenses at Washington state's community and technical colleges and selected licensed private schools for those who have lost their jobs due to economic changes and for those receiving Unemployment Insurance (UI) benefits.
WSAC	Washington Student Achievement Council	The Washington Student Achievement Council (WSAC) is a cabinet-level state agency. They work to raise educational attainment through strategic engagement, program management, and partnerships.
WSOS	Washington State Opportunity Scholarship	Helps low- and middle-income Washington students earn degrees, certificates, or apprenticeships in high-demand trade, health care, or STEM fields and launch careers in Washington State.
YTD	Year to Date	Refers to the period beginning on the first day of the current calendar year or fiscal year up to the current date.

Section 20: Master Calendar

20.1 Overview

A **Financial Aid Office Master Calendar** is an essential tool for ensuring organization, compliance, and efficiency throughout the academic year. It provides a centralized timeline of critical tasks, deadlines, reporting requirements, and regulatory updates that guide daily operations and long-term planning.

By maintaining a comprehensive master calendar, the financial aid team can coordinate activities across departments, avoid missed deadlines, and ensure timely completion of federal, state, and institutional requirements. It also supports accountability, transparency, and proactive communication, helping staff manage peak periods effectively and sustain a consistent level of service to students.
Ultimately, a well-maintained master calendar strengthens compliance and contributes to the overall effectiveness of the financial aid office.

January	
	Winter Term Begins
	Update Net Price Calculator
	Title IV Reconciliation (Pell, DL, FSEOG, FWS)
	ISIR Load for next academic year (i.e., 2026-2027)
	PeopleSoft PUM Release
	State Reporting – Unit Record Report, Institutional Profile reports available from WSAC
	Report Foreign Gifts, Contracts, and Ownership by January 31st
	Tentative campus-based funding levels available, January 31st
February	
	Federal Pell Grant award amounts for each academic year are published by the U.S. Department of Education (ED) by February 1st
	IPEDS Reporting – Student Financial Aid; Graduation Rates; 200% Graduation Rates; Admissions
	Title IV Reconciliation (Pell, DL, FSEOG, FWS)
	Run Spring SAP
	State Reporting – Winter Interim Reports due to WSAC
	Draft Cohort Default Rates available
	Financial Aid Awareness Month
March	
	Campus-based closeout for unexpended funds due in the G6 system, March 1st
	Title IV Reconciliation (Pell, DL, FSEOG, FWS)
	Reminder: Test emergency response procedures annually
	Review and update the **SAP policy** for the upcoming term, March 31st

	Reminder: Review 2-3 policies and procedures
April	
	Spring Term Begins
	IPEDS Reporting – Fall enrollment; Finance, Human Resources; Academic Libraries
	Final Campus-based funding levels available, April 1st
	Title IV Reconciliation (Pell, DL, FSEOG, FWS)
	PeopleSoft PUM Release
	Various IPEDS reporting due
May	
	Title IV Reconciliation (Pell, DL, FSEOG, FWS)
	Conduct staff training on upcoming regulatory changes, May 15th
	WASFAA Conference (May 18-20, 2026, in Omni Rancho Las Palmas Resort & Spa in Rancho Mirage, CA) - https://www.wasfaa.org/annual_conference.php
	Run Summer SAP
	State Reporting – Spring Interim Reports due to WSAC
	New Direct Loan interest rates have been made available for the upcoming award year
	Reminder: Review and update the COA on the website
	Prepare for FISAP data collection, May 31st
June	
	Summer Term Begins
	NASFAA Conference (6/29 – 7/2/2026 in National Harbor, MD) - https://www.nasfaa.org/conference
	Title IV Reconciliation (Pell, DL, FSEOG, FWS)
	Electronic Announcement: DL Interest Rates for next academic year (i.e., 2027-2028)
	State Reporting – Unit Record Report manual available
	Last day for students to submit 2025-2026 FAFSA®, June 30th
	FSA Compliance Audit due through eZ-audit, June 30th, for January 1 to December 31 fiscal year schools
	Review and update the **SAP policy** for the upcoming term, June 30th
	Reminder: Review 2-3 policies and procedures
July	
	New 2026-2027 FAFSA® Year begins, July 1st
	Completion and Graduation rates made available to students, July 1st
	Implement new regulations, July 1st

	Title IV Reconciliation (Pell, DL, FSEOG, FWS)
	Complete Final Closeout of DL for prior year due July 31st
	Electronic Announcement: ISIR Guide for next academic year (i.e., 2027-2028)
	Electronic Announcement: Summary of Changes for Application Processing System Guide for next academic year (i.e., 2027-2028)
	PeopleSoft PUM Release
	State Reporting – Final Year-End Interim Reports (Reconciliation) due - https://wsac.wa.gov/unit-record
	Report Foreign Gifts, Contracts, and Ownership by July 31st
August	
	FISAP made available on COD, August 1st
	ED announces annual crime/fire safety survey due date
	Title IV Reconciliation (Pell, DL, FSEOG, FWS)
	Electronic Announcement: FAFSA® Information to be Verified & Acceptable Documentation for next academic year
	Pell ACA Payments for the current year and the prior year
	Run Fall SAP
	FWS – Earnings Report to COD due August 31st
	Complete final reconciliation of Campus-Based Programs (FWS, FSEOG, Perkins) for the prior year, August 31st
September	
	Fall Term Begins
	Last day for processing 2024-2025 FAFSA® corrections, September 13th
	Final deadline for 2022 FWS earnings corrections, September 13th
	Constitution Day Activities on or near September 17th
	Official Cohort Default Rates (CDR) available by September 30th
	Title IV Reconciliation (Pell, DL, FSEOG, FWS)
	Review EA – Comment Codes and Text for 2026-2027 to get ready for New Year Setup
	Pell Closeout for Current Year due September 30th
	Pell, TEACH & IASG closeouts for 2024-2025 due September 30th
	Report 2024 FWS earnings to COD, September 30th
	PeopleSoft PUM Release
	Complete FISAP due October 1 - FISAP Forms & Instructions: https://fsapartners.ed.gov/knowledge-center/library/resource-type/FISAP%20Form%20and%20Instructions
	Reminder: Review 2-3 policies and procedures

October	
	FAFSA® available for next academic year (i.e., for 2027-2028), October 1st
	FISAP due October 1st
	Annual Security Report made available to students and employees, October 1st
	Completer's lists & debt reporting for FVT/GE due October 1st
	FWS Reporting due October 1st
	New origination fees go into effect for loans disbursed on or after October 1st
	IPEDS Reporting – Institutional Characteristics; Completions; 12-month Enrollment
	Title IV Reconciliation (Pell, DL, FSEOG, FWS)
	New Year Setup for next academic year (i.e., 2027-2028)
	Financial Aid Day, October 15th
	WFAA Conference
	State Reporting – Unit Record Report final submission due to WSAC
	Various IPEDS reporting due
	Review and update **SAP policy** for the upcoming term, October 31st
November	
	Title IV Reconciliation (Pell, DL, FSEOG, FWS)
	Budget Setup for next academic year (i.e., 2027-2028)
	Packaging Setup for next academic year (i.e., 2027-2028)
	Review and Update forms for next academic year (i.e., 2027-2028)
	State Reporting – Fall Interim Reports due to WSAC
December	
	Title IV Reconciliation (Pell, DL, FSEOG, FWS)
	FSA Training Conference (virtual)
	FISAP corrections due December 15th
	Run Winter SAP
	Default Prevention Plans due for schools with Cohort Default rates at 30% or higher, December 30th
	FSA Compliance Audit due through eZ-audit, December 31st, for the July 1 to June 30 fiscal year schools
	Reminder: Review 2-3 policies and procedures

Supporting Tasks

	Daily import, communication management, and award process
	File Review
	Process appeals: SAP, Professional Judgments
	Process student loans
	Packaging/Mass Packaging
	Reconciliation: Pell, Direct Loan, FSEOG, FWS
	R2T4 process/reporting
	Send ISIR Corrections
	Verification of Identity Reporting (V4/V5) in FPP