



MIDWIVES
COLLEGE OF UTAH
MIDWIFING MIDWIVES

**TITLE IV POLICY AND PROCEDURE
MANUAL**

2014

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About this Manual

This manual contains policies and procedures for managing Midwives College of Utah's (MCU) Federal Student Aid program. It was initially developed using recommendations from the Department of Education's Federal Aid Administrator's assessments tools, including the basic policies list and intermediate policies list. In addition to the policies and procedures included in the manual, the Financial Aid Department reviewed and/or updated three institutional policies that are required for submission with the Title IV Eligibility and Certification Approval Report (ECAR):

- Admissions Policy
- Satisfactory Academic Progress Policy
- Refund Policy

These policies are available in the Institutional Policy and Procedure Manual. Please see relevant excerpts from this manual: 1) Appendix A; 2) Appendix B; and 3) Appendix C.

Maintaining Title IV Policies and Procedures

MCU Financial Aid Department (FAD) develops and maintains the MCU Title IV Policy and Procedure Manual using a formal, regularly scheduled review process. The FAD will format this manual in accordance with standard institutional policy and procedures.

Implementation Detail

1. The FAD will attempt two FSA Assessments per award year for a detailed review of a specific topic and/or policy and procedure.
 - If deficiencies are found, the FAD will create an Action Plan using the Department of Education's template and will implement changes within same award year, if possible.
2. The Financial Aid Department will also complete an annual review (generally each summer) of entire Title IV Policy and Procedure manual for currency, and making updates and/or corrections as needed.
3. When a change or correction is needed outside of the regularly scheduled reviews, it will be brought up during staff meeting. All staff will have the opportunity to weigh in. The President and the relevant departments may meet further to discuss the changes/corrections and create changes/corrections collaboratively. The FAD is responsible for ensuring final changes are made to the manual and coordinating any relevant changes required to the MCU Website, Policy and Procedure Manual and Student Catalog

Adequate Title IV Checks and Balances, and Staffing Policy

Policy

The procedures for the awarding and disbursing of federal student aid have been divided into three branches: Financial Aid, Student Finances, and MCU's Third-Party Servicer, Weber & Associates.

All other departments within MCU are responsible for conveying information that may impact upon student aid eligibility to the Financial Aid Department.

- Financial Aid, Student Finances, Registrar, the President, Academic Dean, Graduate Dean, and Clinical Dean have monthly staff meetings to discuss policy updates, department agendas, student concerns, and department requests.
- Financial Aid, Student Finances, Registrar, the President and the Academic Dean meet once a month to discuss student progress. Student progress is also tracked electronically on a "Student Progress Checklist" within a Google Document available to these departments.

Rationale

MCU ensures that there are adequate checks and balances, and staffing, to meet Department of Education's requirements for institutional eligibility and administrative capacity.

The Registrar is responsible for tracking, admissions information, enrollment, leave of absence, credits attempted and completed, withdrawals and drops, and Major Map changes. The Registrar is responsible for informing the Financial Aid Department of any changes that may impact student eligibility.

The Academic Dean/Student Coach works with Financial Aid Department to track student progress, engagement, unofficial/official withdrawals.

The Financial Aid Department is in charge of awarding federal student aid to eligible degree seeking students in good academic standing. It is the duty of this department to verify that the student qualifies for financial aid, and both advise and award the student properly based on the student's FAFSA information, enrollment record, grade level, financial aid history, verification information and academic standing.

Student Finances checks the federal bank account for federal student aid funds every day. When federal student aid funds are received in the federal bank account, the funds are transferred out of the bank account into the school's bank account that day and disbursed to the students. Student Finances maintains strict records that comply with the standards of the Department of Education. Each month, Student Finances Department also submits the required bank statements from the federal Title IV bank account to the Weber & Associate's financial analyst for reconciliation. Student Finances Department notifies the Financial Aid Department of private loans received via a Dropbox tracking sheet, so that the Financial Aid Department can make award adjustments accordingly.

MCU's Third-Party Servicer, Weber & Associates, reviews MCU's student award packages, double checks NSLDS history, submits the NSLDS reports that the financial aid department enters, requests and reconciles student verification data and enters it into the system, confirms signed MPNs, and draws down funds in G5. For an in depth outline of Weber & Associate's contract of duties, please see Appendix D.

The Financial Department Manager reviews student account information, reconciles fiscal records, and attends monthly budget meetings with Student Finances and the President. The Financial Department Manager also submits MCU's yearly EZ Audit.

General Division of Responsibilities		
	Person responsible	Required Date
Financial Aid Department sends out an email to students at the beginning of each semester asking students to indicate their interest in financial aid. The Department will also advise students to complete their entrance counseling and sign their Master Promissory Notes.	Financial Aid Department	Beginning of Semester
Financial Aid Department reviews the student's FAFSA and academic record to verify student's eligibility. Financial Aid Department also checks the student's loan history before awarding.	Financial Aid Department	As needed
Financial Aid Department will follow up with student if necessary, and request further documentation for verification as needed.	Financial Aid Department	As needed
Financial Aid Department will input the student's award package into the start form and verify that all information has been reviewed and believed to be accurate.	Financial Aid Department	As needed
Third-party servicer will review the start form for errors and notify Financial Aid if an error has been made. The processor also reviews the attached documentation for verification and requests further information when needed.	Third-party servicer	After students award packages are in the system
Financial Aid will sign the current award list that the Third-party servicer verifies. This	Third-party servicer and	As needed

permits the Third-Party Processor to pull the funds that will be directed to MCU's federal bank account.	Financial Aid	
Financial Aid will send Student Finances the current award list and the date that the funds are expected to come in. The current award list specifies each student's grant/loan name and dollar amount.	Financial Aid and Student Finances	As needed
Student Finances creates a tracking sheet for each student on which monies are disbursed in the order of fees, then current semester COP and the following semester COP. The balance is returned to the student as a cost of living allowance.	Student Finances	The day that funds are received into MCU's federal bank account.
Student Finances records funds on student account, notifies student of disbursement, and enters disbursement into Quick Books.	Student Finances	The day that funds are received into MCU's federal bank account.
Student Finances writes cost of living checks and directs office staff to print and mail check.	Student Finances	After communication with student.
Financial Aid ensures compliance with the benchmarks of the Department of Education, by means of, but not necessarily limited to: submitting IPEDS survey collections, updating computer processing systems to correlate with award years, sending the necessary financial information to third-party processor for creation of budgets, keeping track of student's enrollment.	Financial Aid	As needed.

Institutional Eligibility

Policy

The Financial Aid Department is responsible for submitting a timely and complete Eligibility and Certification Approval Report (ECAR) to the Department of Education (ED) at the time of recertification or for reporting changes or updates. This department is also responsible for coordinating the response from ED in regard to any reported changes that affects the institutions eligibility, and for meeting any reporting timelines established by ED with regards to the ECAR.

The Financial Aid Department, with the President and the Third-Party Servicer, are also responsible for ensuring that ED approved programs meet minimum standards for Title IV purposes.

The President ensures that MCU is legally authorized to provide postsecondary programs in all states in which the institution is considered to have a presence.

Implementation Detail (Procedure)

MCU saves a copy of its E-App (with date submitted) and all supporting documentation electronically in the MCU Dropbox.

The signed Program Participation Agreement Form (PPA) is kept in the locked file closet at the MCU offices.

The academic calendar for the currently approved program is non-term.

- This determination is made based on several characteristics listed on page 3-5 of Volume 3, Chapter 1 of the Federal Student aid handbook.
- The school's academic year for purposes of Title IV will be 24 semester credit hours and 60 weeks. This is the minimum time frame and maximum credits allowed within this time frame under the non-term definition.

Student Title IV Eligibility

Policy

To be eligible for Federal Student Aid (FSA) funds, all students must meet minimum requirements established by the Department of Education. MCU ensures eligibility requirements are met before awarding and disbursing of FSA funds.

All students must:

- have a complete Free Application for Federal Student Aid (FAFSA) on file with MCU
- demonstrate financial need (for most aid programs).
- be enrolled as a regular student in an eligible program per the current ECAR.
- not be enrolled simultaneously in elementary or secondary school.
- have a high school diploma or its recognized equivalent (e.g., a GED).
- have a valid Social Security Number with the Social Security Administration (some exceptions are permitted).
- be a U.S. citizen or eligible noncitizen.
- be registered with Selective Service, if required.
- be making satisfactory academic progress (SAP).

Note: This list contains general eligibility factors only.

Implementation Detail (Procedure)

Students will be scheduled to take at least twelve credit hours. Twelve credit hours are considered full time for Title IV purposes. A student's initial award will be disbursed at the start of this 12 credit term. The student will receive a second disbursement of their initial award upon the completion of the initial twelve credit hours and in a minimum of 15 weeks.

The Financial Aid Department, with the help of the Registrar, is responsible for monitoring the completion of the credit hours and confirming the completion of those scheduled hours with the Weber representative prior to making a second disbursement of this student's program.

When a student enrolls for a term that requires a clinic, the student's financial aid award will be based on the total number of credit hours scheduled including the course work and the credit for the clinical credit. The student will be eligible for a second disbursement as soon as the total number of credit hours including the clinical credit hours has been complete.

Financial Aid AdvisingPolicy

The Financial Aid Department responsible for providing financial aid advising.

Rationale

This policy is intended to describe the various means MCU uses to inform students of their rights and responsibilities with regards to federal student aid funding.

Implementation DetailOne-on-One Advising Appointments

- Students are informed of advising opportunities with their award letter.
- Advising is generally by appointment, and is conducted over the phone.

Written Guidance

- New Student Acceptance Letter Pamphlet: students must sign that they understand and agree to the terms outlined in their letter.
- College catalog and website: contains general information about the financial aid programs, including how to apply, relevant policies and procedures (ex: Satisfactory Academic Progress).

Verification PolicyPolicy

Student ISIRS may be selected for verification by the Department of Education or by Midwives College of Utah. Applications are not considered complete, and aid will not be disbursed, until after the verification is complete. Award letters are created after verification is complete, so there should be no resulting overpayment of funds.

Implementation Detail (Procedure)

1. The Third-Party Servicer and the MCU Financial Aid Department (MCU Fin Aid) reviews all ISIRs.
 - New students: ISIR review occurs after students are accepted into the program and are officially enrolled.
 - Continuing students: ISIR review occurs when a student is eligible for the next payment period that falls under the new ISIR.
2. MCU Fin Aid notifies students by email if they have been selected for verification by Central Processing System. When selected MCU instructs the student to complete the Third-Party servicer verification worksheet and provide supporting documentation.
3. The student submits all required documentation to MCU. MCU forwards this to the Third-Party Servicer.
4. Third-Party Servicer performs the verification.
 - If additional follow-up is needed, the Third-Party servicer informs MCU. MCU will contact by email the student until the application is considered complete.
 - If verification is determined to be complete, the Third-Party servicer informs MCU. MCU notifies the student by email.
 - The Third-Party Servicer makes corrections to application information based on results of verification.

ISIRs may also be selected for verification if the MCU financial aid department receives internal information that conflicts with the ISIR. MCU will request documentation by email, as appropriate, to resolve the conflicting information and forward this to Weber for review.

If additional follow-up is needed, the Third-Party servicer informs MCU. MCU will contact the student by email until the application is considered complete.

Once verification is determined to be complete, the Third-Party servicer informs MCU. MCU notifies the student by email.

Professional Judgment Policy

Policy

Professional Judgments (PJs) may be made in limited, unique circumstances on a case-by-case basis. The conditions addressed by PJs must differentiate the individual student from a group of students.

Upon the President's approval, the Financial Aid Department is eligible to make PJ decisions. The Financial Aid Department is responsible for maintaining documentation for all requests and decisions, regardless of the outcome.

MCU will complete verification on the student's ISIR prior to reviewing a professional judgment request.

- Exception: this requirement does not apply to students seeking a dependency override.

MCU will resolve all conflicting information prior to reviewing a professional judgment request.

It is the responsibility of the student to seek PJ requests. MCU will not seek out students with unusual circumstances to recommend PJ requests.

PJs will not automatically carry over from one award year to the next.

- Students must request the same PJs each award year (ex: addition of dependency care costs to EFC).
- MCU may make the same adjustment for multiple years provided that acceptable documentation is provided each time.

MCU will not make direct changes to the Expected Family Contribution (EFC). MCU may make changes to the data elements that determine EFC, including:

- Income
- US Income Taxes Paid
- Assets
- Household Size
- Number in College

Rationale

The Financial Aid Office will refer closely to guidance put forth by the Department of Education in reviewing PJ requests and will never use PJs to intentionally circumvent the law or regulations.

Implementation Detail

1. To request a professional judgment, students must contact the Financial Office.
 - Students must provide documentation to substantiate their request. Examples of documentation include, but are not limited to:
 - i. *Cost of Attendance Adjustment Requests*: account statements, receipts, letters from providers, proof of out-of-pocket expenses
 - ii. *EFC Data Element Adjustment Requests*: tax documents, proof of out-of-pocket expenses, letter of change/termination of employment, divorce/separation decrees, death certificate
 - iii. *Dependency Override Requests*: letter from a third party (ex: member of clergy, caseworker, counselor). Third-Party servicer worksheet.
2. To evaluate the requests, the Financial Aid Office collects supporting documentation, reviews relevant rules and regulations, notifies the President of her recommendation.

3. The President reviews the recommendations and supporting documentation, and approves or denies the Professional Judgment request.
4. The Financial Aid Office follows up, as needed, based upon the PJ request. The Third-Party servicer makes changes to the student ISIR if needed.

When possible, the PJ decisions are made final one week before the start of the student's payment period.

General Awarding, Packaging, and Disbursing

Policy

MCU packages aid in accordance with federal regulations and guidance published in the Federal Student Aid Handbook.

Implementation Detail

1. The Financial Aid Department monitors potential financial aid applicants in two ways:
 - New Students: whether an Institutional Student Information Record (ISIR) has been received
 - Continuing Students: eligibility based on credit completion and anticipated enrollment
2. The Financial Aid Department downloads the student's ISIR from the Third-Party Servicer's "Virtual Financial Aid Office" (VFAO), a secure site that provides services for schools to submit information on students requesting aid.
 - "Eagle Express" is an electronic application within VFAO that stores student ISIRS. The Financial Aid Department is able to search for students by name, social security number, and award year and download student ISIRs. ISIRs cannot be reviewed on "Eagle Express."
3. The Financial Aid Department imports ISIRs into ED Express where they can be reviewed.
4. The Financial Aid Departments reviews the ISIRs and checks each student's financial aid history on NSLDS. For ISIRs flagged for verification, see *Verification Policy*.
5. If the ISIR is deemed complete, the Financial Aid Department determines the student's eligibility and issues the student an official MCU financial aid award letter (see "Award Letter Process" below).
6. Once the student consents to the award, the Financial Aid Department inputs the student's financial aid information onto a "Start Form," an electronic application within the VFAO. The Start Form is the primary way the Financial Aid Department requests the processing of students from the Third-Party Servicer.
 - i. The Financial Aid Department fills out the Start Form, which includes the student's name, Social Security Number, award year, academic year, dependency status, program of study, grade level, attendance mode, course price, total cost of education, academic status, start date, expected graduation date, status effective date, whether the student

- lives with parents or on campus, total credit hours in the program, number of transfer credits, credits earned up to date, loan period and disbursement dates for Direct Loans and disbursement dates for Pell.
- ii. The Start Form is then electronically signed by the Financial Aid Department and received by the Third-Party Servicer for review. Start Forms are usually submitted in batches by the Financial Aid Department.
7. After double checking the student's eligibility in NSLDS and ensuring that the student completed entrance counseling and the Master Promissory Note, the Third-Party Servicer then creates a "Payment List" that includes each student's name and Social Security number, with the amount of Pell and Direct Loans that are scheduled to be disbursed to that student, and the date of that scheduled disbursement.
 8. The Financial Aid Department must sign the Payment List.
 9. After the Payment List is signed, the Third-Party Servicer draws down the funds from G5 into the MCU Federal Bank Account.
 10. The Third-Party Servicer sends an electronic receipt to the Financial Aid Department in the form of "Checks" for each student.
 11. The Financial Aid Department maintains these checks electronically.
 12. The Payment List is then electronically sent to Student Finances in order to guide the department on when to expect the student funds, and how much of each loan/grant is disbursed to each student.

Award Letter Process

- The MCU Official Award Letter explains the amount the student is eligible for in Pell, Subsidized, and Unsubsidized funds for that award year. Funds are packaged in the following order: Pell, Outside Scholarships/Grants, Private Student Loans, Subsidized Direct Loans, Unsubsidized Direct Loans. Students are generally dissuaded from taking out private loans because it may impact the amount of federal loan funds for which they are eligible.
- The award letter details how the disbursements are spaced out, generally two disbursements per academic year.
- Also, the award letter explains that new students receive a federal student aid disbursement when they are scheduled for twelve credits, and receive all other disbursements after they have completed twelve credits and are scheduled for another twelve.
- Information on the mandatory completion of entrance counseling and the Master Promissory Note is also included in the award letter.
- Students also receive an accompanying email from the Financial Aid Department that requires the student to consent to each loan/grant amount before they are processed. The consents are received via email and stored electronically in a "Loan Consent" folder.
- The email also requests that the student report any additional education loans, grants or scholarships that the student will be receiving for the award year in order for the Financial Aid Department to adjust the award accordingly.

- If a student is close his/her lifetime borrowing limit for grants and loans, the Financial Aid Department indicates how much the student has left to borrow or earn in the email.
- Students are given the Financial Aid Department's contact information for questions or concerns. Financial Aid Counseling is performed either over email or over phone.

Creating Budgets

Implementation Detail (Procedure)

1. The Third-Party Servicer requests that the Financial Aid Department fill out their budget worksheet each award year. The budget worksheet includes information on the school's fees, tuition, books, and supplies for each year of each program.
2. The Third-Party Servicer takes those figures and adds the cost of living expenses.
3. The Third-Party Servicer then creates an official budget for each academic year in academic each program and divides the Cost of Education up each month leading up to the maximum months in our defined academic year. Dependent and Independent students have different budgets.
4. The budgets are then sent back to the Financial Aid Department for review.
5. Final budgets must be signed and sent back to the Third-Party Servicer.

Pell Grant Program

Policy

Student eligibility for Pell Grant is based upon need, as determined by the student ISIR, by enrollment status, Cost of Attendance, and by lifetime eligibility. All students, including transfer students, have prior Pell history reviewed.

Scheduled Award: maximum amount a student can receive for full-time, full-year.

Annual Award: maximum amount a student would receive during a full academic year for a given enrollment status, EFC, and COA.

MCU uses Formula 4 to calculate Pell Grant annual award. Formula 4 is the scheduled award multiplied by the lesser of:

$\frac{\text{Credits in Payment Period (12)}}{\text{Credits in Academic Year (24)}}=1$

$\frac{\text{Weeks in Payment Period (30)}}{\text{Weeks in Program Academic Year (60)}}=1$

To receive the first full-time disbursement, the student must be:

- Scheduled for at least 12 semester credit hours

To receive the second full-time disbursement, the student must:

- Have completed prior 12 semester credit hours in a minimum of 15 weeks, and
- Be scheduled for an additional 12 semester credit hours.

Disbursements occur year-round and are based on individual student progress.

Implementation Detail

1. The Financial Aid Director (FAD) creates initial Pell Grant awards.
 - This is done for each student at the beginning of the award year, and again each semester on a student-by-student basis, using the Department of Education's Pell Chart (via the third-party servicer).
 - Awards are input into the third party servicer's "Start Form". See General Awarding policy for details on awarding and disbursing.
 - Award letters are maintained electronically.
2. The FAD maintains the internal credit tracking spreadsheet to monitor student progress and credit completion.

All Pell records are documented in the "Start Form," including but not limited to:

- Pell Grant Amount
- Payment Period
- Calculations used to determine Pell Grant award
- Date of disbursement
- Amount, Date, Basis of refund or overpayment calculations (including R2T4)

Students with a first disbursement in the May payment period will fall under a crossover payment period.

1. First disbursement will be made under the current year ISIR (ex: May 2014, use 13-14 ISIR).
2. Second disbursement will be made under the next year ISIR (ex: January 2015, use 14-15 ISIR).

Direct Loan Program

Policy

When awarding student loans, Pell Grants are considered first source of aid. Subsidized loans are awarded before unsubsidized loans.

The student EFC may be substituted with unsubsidized loans.

Borrower Based Academic Year

Loan Period is 60 weeks and 24 credits. The loan period includes two 30 week/12 credit payment periods, based upon individual student progress. The student may only receive up to their annual loan limit each loan period.

General awarding

Loan disbursement amounts may increase or decrease from one payment period to the next depending upon changes to the student's EFC, COA, outside sources of aid, grade level, dependency status, annual and aggregate loan limits.

Implementation Detail

If an award amount is increased from one payment period to the next, the Financial Aid Officer must release the second award, and then create a different award for the increased amount.

1. The Financial Aid Director (FAD) creates initial Direct Loan awards.
 - This is done for each student on a case-by-case basis.
 - Awards are input into the third party servicer's "Start Form". See General Awarding policy for details on awarding and disbursing.
 - Award letters are maintained electronically.
 - Students must consent to receiving the direct loan funds via email. Consents are stored electronically in the Loan Consent form (MCU internal system).
 - i. Consent must be made via MCU's internal email system.
 - ii. For new borrowers, consent includes statement that borrower has signed the Master Promissory Note (MPN) and completed entrance counseling.
2. Students are notified that they must complete the MPN and entrance counseling with their initial award letter.
 - The third-party servicer confirms completion of the MPN and entrance counseling electronically. Funds are not released until confirmation has been received.
3. The Financial Aid Officer enters enrollment start date in the "Start Form." The third-party servicer tracks students with a 30-day wait period based on this date.
4. The Financial Aid Office makes any award adjustments as needed. The third-party servicer reviews all awards and all adjustments, and follows up with MCU as needed.

5. The Financial Aid Office makes every effort to have all students complete and receive confirmation of exit counseling.
 - Withdrawn Students: The Registrar (official withdrawal) or Student Finances (financial withdrawal) notifies the Financial Aid Office. This is tracked in the student progress spreadsheet. The Financial Aid Office sends an official withdrawal letter, which includes the R2T4 calculation and exit counseling instructions. Changes are made to the student's NSLDS records by the Financial Aid Office via the Third-Party Servicer.
 - Graduates: The President notifies the Financial Aid Office when a student graduates. The Financial Aid Office sends exit counseling instructions at this time. Changes are made to the student's NSLDS records by the Financial Aid Office via the Third-Party Servicer.

All loan records are maintained manually in MCU Financial Aid Office electronic records. This includes, but is not limited to:

- Subsidized and Unsubsidized Loan Amount
- Loan Period
- Calculations used to determine Direct Loan award
- Date of disbursement
- Amount, Date, Basis of refund or overpayment calculations (including R2T4)

Return of Title IV Funds

Policy

The requirements for Title IV program funds when a student withdraws are separate from any refund policy that the school may have. Therefore, the student may still owe funds to the school to cover unpaid institutional charges. The school may also charge the student for any Title IV program funds that the school was required to return. A copy of the school's refund policy is contained in the MCU Catalog.

To request an official withdrawal, all students must contact the Registrar about his/her intent to withdraw. The law specifies how Midwives College of Utah must determine the amount of Title IV program assistance that a student earns if the student withdraws from school, either voluntary or involuntary. The withdrawal date that is used in determining a student's refund or repayment will be defined as the actual date that the student begins the withdrawal process, or the student's last day of academically related activity, should the student leave the school without notification.

The U.S. Department of Education requires Midwives College of Utah to use the Return of Title IV Funds Policy for students who withdraw from school and who are receiving Federal Title IV student financial aid. Title IV funds refer to federal financial aid programs authorized under the Higher Education Act of 1965 (as amended). The Title IV programs that are covered by this law are: Federal Pell Grants, Iraq Afghanistan Service

Grants, Academic Competitiveness Grants, National SMART Grants, Stafford Loans, PLUS Loans, Federal Supplemental Educational Opportunity Grants (FSEOGs), and Federal Perkins Loans.

When a student withdraws during a payment period, the amount of Title IV program assistance that a student has earned up to that point is determined by a specific formula. If a student received (or MCU or parent received on student's behalf) less assistance than the amount that the student earned, the student may be able to receive those additional funds. If the student received more assistance than earned, the school and/or student must return the excess funds.

The Department of Education expects a student to "earn" the financial aid they receive. Students who receive federal aid in the form of a Federal Pell Grant, or Federal Stafford Student Loan(s) are expected to earn those funds by attending school and completing the time in the term for which they are paid.

The Return to Title IV Calculation is calculated within 30 calendar days of the withdrawal date. The Return to Title IV funds are returned back to the government within 45 calendar days.

The amount of assistance that a student has earned is determined on a pro rata basis. For example, if a student was scheduled to complete 30% of the student's payment period at the time the student withdrew, the student earns 30% of the assistance that the student was originally scheduled to receive. Once a student has completed more than 60% of the payment period, the student earns all the assistance that the student was scheduled to receive for that period. The percentage of the period completed is calculated as follows:

Number of calendar days completed in the period / Total number of calendar days in the payment period

The completion date of the payment period must be projected based on the student's progress as of the withdrawal date. In general, to calculate the number of days in the period, the following example applies.

Example:

Determine the percentage of credits earned:

Number of credits completed (4) / Number of credits in payment period (15)

= Percentage of credits earned (.267)

Determine the number of days in the period:

Number of days attended (43) / Percentage of credits earned (.267)

= Number of days in the period (161)

If a student did not receive all of the funds that the student earned, the student may be due a post-withdrawal disbursement. If the post-withdrawal disbursement includes loan funds, the school must get the student's permission before it can disburse them. A student may choose to decline some or all of the loan funds so that the student does not incur additional debt. The school may automatically use all or a portion of a student's post-withdrawal disbursement (including loan funds, if the student accepts them) for tuition, fees and books/supplies. For all other school charges, the school needs the student's permission to use the post-withdrawal disbursement. If the student does not give permission, the student will be offered the funds. However, it may be in the student's best interest to allow the school to keep the funds to reduce the student's debt at the school.

There are some Title IV funds that a student is scheduled to receive that cannot be disbursed to the student once the student withdraws because of other eligibility requirements. For example, if the student is a first-time, first-year undergraduate student and the student has not completed the first 30 days of the student's program before the student withdraws, the student will not receive any Direct Loan funds that the student would have received had the student remained enrolled past the 30th day.

If the student receives (or the school or parent receives on the student's behalf) excess Title IV program funds that must be returned, the school must return a portion of the excess equal to the lesser of:

1. The student's institutional charges multiplied by the unearned percentage of the student's funds, or
2. The entire amount of excess funds.

The funds are returned in the following order:

1. Unsubsidized Direct Loan
2. Subsidized Direct Loan
3. Pell

The school must return this amount even if it didn't keep this amount of the student's Title IV program funds. If the school is not required to return all of the excess funds, the student must return the remaining amount. Any loan funds that the student must return, the student (or the student's parent for a PLUS Loan) repay in accordance with the terms of the promissory note. That is, the student makes scheduled payments to the holder of the loan over a period of time.

Any amount of unearned grant funds that a student must return is called an overpayment. The amount of a grant overpayment that a student must repay is half of the grant funds a student received or was scheduled to receive. A student does not have to repay a grant overpayment if the original amount of the overpayment is \$50 or less. A student must make arrangements with the school or the Department of Education to return the unearned grant funds.

Students who do not begin or stop attendance in a course may be subject to this policy, if not actively attending at least one other course. Students in this situation are required to confirm their written intent to attend the course scheduled later in the term. If a student provides written confirmation of the intent to attend but fails to attend, the student will be withdrawn as of the date of the last attendance. Students may change the date of their intent to return only when received by the College prior to the original return date.

Implementation Detail

1. The Financial Aid Department will notify the student via email of the amount of Return to Title IV (R2T4) funds that the school must return to the government, the amount that the student must return, and will require that the student performs exit counseling at studentloans.gov.
2. Student Finances will then deduct the school's Return to Title IV funds from the student account and adjust the student's remaining balance accordingly.
3. Student Finances will post the R2T4 and balance to the student's account and, will notify the student via email.

Appendix

Appendix A

Admissions Policy & Procedure

Midwives College of Utah (MCU) Admissions Committee will conduct a qualitative and quantitative review of each applicant to determine acceptance. The Admissions Committee members are the Registrar, Graduate Registrar, President, Academic Dean and two to three faculty members. Per Title IV requirements, MCU admits as regular students only persons who—(i) Have a high school diploma; (ii) Have the recognized equivalent of a high school diploma; (iii) Are beyond the age of compulsory school attendance.

Rationale

In order to attract and maintain students who will achieve their personal educational goals and succeed as an MCU student acceptance without regard to gender, race, marital status, ethnic origin, creed, age or sexual orientation or disability, the admissions policy must be clearly defined and assessed.

Faculty, students and staff are given the opportunity to periodically evaluate student admissions criteria in order to assure relevant input from all stakeholders. The Admissions Committee considers feedback and reviews previous semester candidates to determine success rate and identify emerging patterns of concern.

Implementation Detail

	Person responsible	Required date
Applicant interviews are completed by Registrar and Graduate Registrar. New applicants and required application materials are tracked through the on-line Applicant Manager.	Registrar interview undergrads; Graduate Registrar interview graduate students	Before semester acceptance deadline
Registrar works with student to assure timely submission of all application documents.	Registrar	By specified deadlines
Academic Dean and Faculty Admissions Committee (comprised of volunteer faculty) review applicant essays and input scores on essay quality and applicant's writing ability. Committee also provides qualitative commentary on each candidate. Scores and input recorded on the Applicant Interview Tracking Tool spreadsheet.	Academic Dean / Faculty Admissions Committee	Prior to Admissions committee review
Registrar reviews applicant documents and assigns a score for the following categories: former college transcript GPA, letters of reference, birth experience, obstacle plan, financial plan, and completion of application. Registrar provides qualitative commentary from one-on-one interview.	Registrar	
Admissions committee meets to review applicants, interview notes, and cumulative score for all application materials. Quantitative score ranking and qualitative	President, Ad Asst., Registrar, Grad Registrar, & faculty	One week after application deadline
analysis are both considered in determining students accepted.	member	
Students are notified if accepted or declined	Registrar	Two weeks after application deadline

Appendix B

Satisfactory Academic Progress (SAP) Policy and Procedure:

Rationale

The field of midwifery is a rigorous and complex study. Academic excellence and timely succession through the program is expected and will assure student success in regard to Midwives College of Utah's mission and student academic progress.

In order to assist students in achieving satisfactory academic progress, and in addition to the procedures outlined below, the President, Coaching Department, Student Finances and Financial Aid departments conduct monthly Student Progress Meetings to identify students who are at risk of not meeting SAP. The Student Progress Checklist is updated and made available to all relevant staff members electronically. Furthermore, evaluations are conducted at the end of each 15-week semester. Students who failed to achieve 75% progress in the classes assigned to their major map for the given semester will be identified as At Risk. At Risk designation does not affect Title IV funding, however, students who remain At Risk for two semesters in a row (30 weeks) may be placed on Academic and Financial Aid Warning.

The following satisfactory academic progress (SAP) standards apply to all MCU students, regardless of educational program and Title IV participation.

Implementation Detail

SAP Evaluations

Evaluations of satisfactory academic progress will be conducted in 30-week intervals for both Title IV and non-Title IV students. This corresponds to the Title IV payment period of roughly 30 weeks, or two 15-week semesters. Academic progress will be evaluated by the Coaching Department, and conveyed to the Registrar, Student Finances, and Financial Aid departments through email.

In order to achieve Satisfactory Academic Progress, the student must maintain a GPA of 2.5 or higher over the course of the evaluation period, and achieve 75% progression through the period. 75% progression is calculated by dividing cumulative hours *completed* with a C or better by cumulative hours *attempted*. A course is considered attempted if it has been activated.

Students must also be on pace to complete their program within 150% of the length of the program. For the Associate and Bachelor degree, length is measure in credit hours. For the Masters degree, length is measured according to minimum program length (in months/years).

For programs longer than two years, students must have a cumulative GPA of at least a 2.5 (B-) or its equivalent at the end of the second academic year (120 weeks).

SAP and Incompletes, Withdrawals, Repeats and Transfer Credits

If a class is not completed by the end of a 30-week evaluation period (for example, if a student takes an extension), the class will count as an Incomplete only for SAP purposes. While Incompletes are not calculated into a student's GPA, they are considered "attempted" courses and are therefore included in the determination of whether the student has achieved 75% progress through the period. Course withdrawals are also not included in the student's GPA calculation.

When a course is repeated or an extension completed, the original grade is deleted and GPA is recalculated using the new grade.

Transfer credits are excluded from GPA; in order to be accepted, however, transfer credits must have a grade of C or higher. Transfer credits do count toward the 150% maximum time frame.

Students are permitted to take one 15-week time out during the course of their program. Students may finish courses currently enrolled in during the duration of the time out and will not be allowed to enroll in any new courses during the time out. If the time out falls at the end of the evaluation period, any grades achieved and courses completed during the time out will be used in determining whether SAP has been achieved during that evaluation period. If the timeout falls at the beginning of the evaluation period, grades achieved and courses completed during the time out will be retroactively applied to the previous period's SAP determination, and SAP for the current period will be based off of courses enrolled in during the semester following the timeout.

SAP and Title IV Students

Students who fail to make Satisfactory Academic Progress may be ineligible for assistance under Title IV, HEA Programs. The following section describes how financial aid eligibility is affected by failure to achieve SAP.

Academic Warning

Upon evaluation at the end of each 30-week period, students who fail to meet SAP standards will be issued an Academic Warning by the Academic Dean for the following reasons:

- Student does not complete PROD 100 within one semester.
- Student fails to make 75% progress within a 30 week period (two MCU semesters). Seventy-five percent progression is calculated by dividing cumulative hours completed with a C or better by cumulative hours attempted. A course is considered attempted if it has been activated.
- Student has a cumulative GPA under 2.5

Academic Probation

The Academic Dean will issue an Academic Probation for the following reasons:

Student has not met the remediation expectations from an Academic Warning

- Student has not met the remediation expectations from an Academic Warning
- A second incident of academic integrity violation occurs
- Student fails to follow action plan when an honor policy violation has occurred and is placed in the student's file

Financial Aid Warning

Students who are issued an Academic Warning will also be issued a Financial Aid Warning via email. The student may continue to receive assistance under the Title IV, HEA programs for one evaluation period despite determination that the student is not making satisfactory academic progress. Financial Aid Warning status may be assigned without an appeal or other action by the student.

Financial Aid Probation

When a student fails to make satisfactory academic progress in the 30 weeks during which the student is on Financial Aid Warning, the student will lose eligibility for assistance under Title IV, HEA programs. Students will be notified of this via email. However, eligibility for financial aid may be reinstated and the student placed on Financial Aid Probation if:

- a. An appeal is filed by the student (See Financial Aid Probation Appeals Process), and
- b. The student agrees to follow an academic plan developed by the school that will ensure that the student is able to meet the school's SAP standards by the next payment period. For example, the department may choose to require the student to fulfill specific terms and conditions such as taking a reduced course load or enrolling in specific courses. At the end of one payment period (30 weeks) on Financial Aid Probation, the student must meet the school's SAP standards or meet the requirements of the academic plan developed by the department to qualify for further Title IV, HEA program funds.

Students who fail to make SAP while on Financial Aid Probation will be ineligible for funding under Title IV, HEA programs in the subsequent period.

Additionally, if a student fails to make SAP, or does not pass a course while on Financial Aid Probation, the Registrar and Academic Dean will meet with the student and determine if the student is an appropriate midwife candidate. The student may be dismissed from the program.

Financial Aid Probation Appeals Process

A student who has not made SAP while on Financial Aid Warning can appeal to reestablish his/her eligibility to receive assistance under the Title IV, HEA Programs. The following are acceptable reasons for filing an appeal:

- Serious medical condition accompanied by a doctor's note
- Insufficient communication between the student and faculty/staff due to extenuating circumstances
- Other special circumstances, such as the death of a family member.

The student must state in writing why he/she hasn't met the academic standards required, and what has changed in the student's situation that will allow him/her to demonstrate SAP at the next evaluation. The student must also meet with the Student Life and Leadership Department to create an academic plan that will ensure that he/she will meet SAP for the next evaluation. The student will be informed that they will lose eligibility for Title IV funding if they fail to meet SAP under the academic plan.

Students requesting an appeal to the policy are encouraged to submit documentation to support their request. The Department will take one of two actions: approve the appeal, place the student on Financial Aid Probation and recommend the student for an Academic Plan, or deny the appeal.

Consumer Information Requirements

The Financial Aid Department is responsible for ensuring MCU is compliant with the SAP Consumer Information Requirements under 34 CFR 668.42(c)(2). MCU must notify current and prospective students of this policy, including but not limited to standards for maintaining SAP and the criteria for reinstating eligibility.

Appendix C

Refund Policy

If a student chooses to withdraw from MCU, the following options are available:

If the student has **enrolled in fewer credits** than they have paid for but have **overpaid for less than ten (10) credits**, the credit value (calculated at the current tuition rate) will remain on the student's account for up to one year to be used toward continuing education or re-enrollment OR the student can donate credits to the Briana Blackwelder Equal Access Scholarship fund

If the student has **paid for ten (10) or more credits than enrolled in**, the student has the following options:

- a. The student can choose to have the credit value (calculated at the current tuition rate) remain on the student's account for up to one year to be used toward continuing education or re-enrollment.
OR
- b. The student can opt for a refund of 50% for any credit(s) beyond ten (10) credits the student did not enroll in.
OR
- c. Credits can be donated to Briana Blackwelder Equal Access Scholarship fund.

Major Map Revision

Minor major map revisions (moving classes from one semester to another) can be made upon student request. If a major map revision requires the program to be lengthened by one or more semesters, there will be a \$25 fee for major map revision. The student's payment plan will be recalculated to reflect the new length of time before graduation. If a major map revision extends the program's final deadline, a letter of rationale must be written by the student and approved by the MCU President.

Program Revision

If a student chooses to transfer from one degree program to another, there will be a charge of \$25 for major map revision.

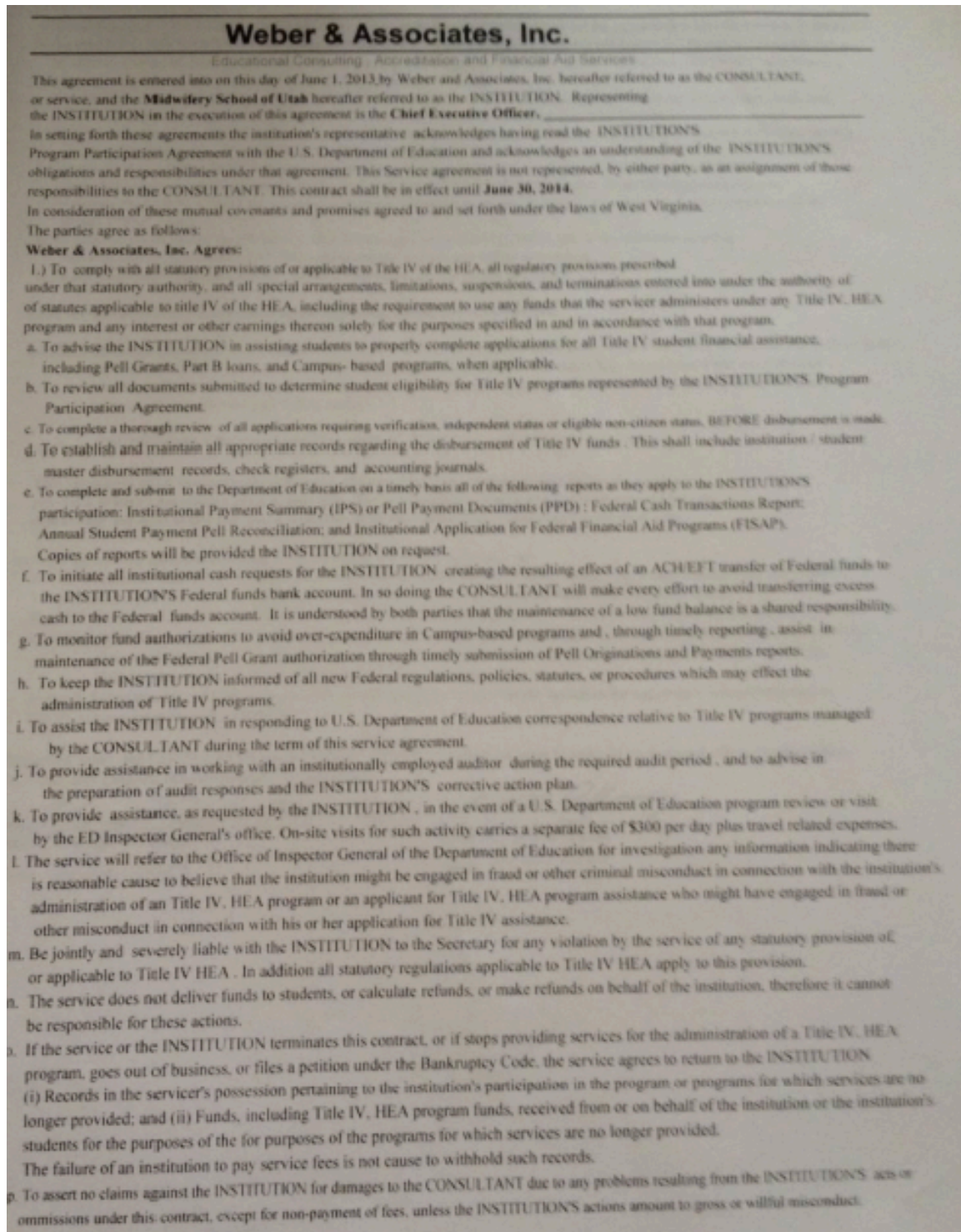
Veterans Administration Military Student Billing Policy and Procedure

Midwives College of Utah (MCU) bills the Military for the student's classes according to the listing on their major map thirty (30) days prior to the semester start. MCU receives payment for those classes within 2-3 weeks. At the end of the semester or within 120 days of the class expiration, we submit the grades for the billed classes and the process is complete.

Because military student's classes are billed 30 days in advance of the start of a semester, their major maps may not be changed for the upcoming semester after the 15th of March, 15th of July or 15th of November. Once the student is billed for the class it cannot be moved or changed on the major map. The student has to complete classes invoiced to the military by the expiration date or the student has to reimburse the military for those funds.

Wording: We cannot say we are "a VA approved school." We can say that we are an "approved school for VA Benefits."

Appendix D



2) The INSTITUTION agrees :

- To provide the CONSULTANT with all necessary and accurate documentation to carry out the assigned activities described in 1) above.
- To inform the CONSULTANT of any changes in the status of the institution; including, but not limited to, change of ownership, change of address, change of financial aid coordinator, addition of new programs, limitations imposed by the INSTITUTION'S state licensing agency, Accrediting Commission, or the U. S. Department of Education.
- To provide the CONSULTANT with the INSTITUTION'S academic calendar, course offerings, tuition and fee structure, and other information needed to appropriately manage the INSTITUTION'S student financial assistance program.
- To follow all provisions of the U.S. Department of Education Program Participation Agreement and understand that final responsibility for proper management of Federal financial aid funds rests with the INSTITUTION.
- To provide the CONSULTANT with timely reports concerning student progress, change of status, withdrawal, refunds made, change of course or other information necessary to manage the INSTITUTION'S student financial assistance programs.
- To provide the CONSULTANT the necessary enrollment information, student start data, etc. necessary for the completion of the annual FISAP report.
- To assert no claim against the CONSULTANT for damages to the INSTITUTION, due to any problems resulting from services, unless the CONSULTANT'S actions amount to gross and willful misconduct.
- To pay all invoices from the CONSULTANT within fifteen days of receipt of invoice.

3) For services provided the institution agrees to pay fees for the following services:

Pell Grant Service. Fees based upon funds disbursed. \$25.00 per Pell student paid. Not to exceed 25 Pell students under these terms. Pell charges are assessed only if a student is paid the first Pell payment. No-shows who are processed and never paid are not charged. Second or subsequent Pell payments are not charged. When a student is paid in two fiscal years a new charge is assessed when the new year Pell is paid.

Federal Family Education Loan Processing. 57.50 per month and \$17.00 per loan certified.

This agreement shall automatically self-renew 45 days prior to its expiration date unless the service is provided written cancellation prior to that date. The service shall be required to provide advanced notice concerning the next year's charges, a minimum of 90 days prior to the agreement's expiration date.

4) Other agreements agreed to and made to be an official part of this agreement are:

EDE Services Annual Fee \$140.00 **or (but not both) Eagle Express \$240.00 Annual Fee. Complementary for 2013-2014.**

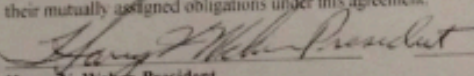
SURE Services Monthly Fee- \$30.00 per month. This fee covers the expenses incurred to connect with DOE.

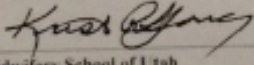
EDE Services - Corrections ISIRS 1.85 each. (This fee is charged only when an ISIR correction is done by the service.)

SSCR Services charged at \$1.15 per student. Fees normally assessed bi-monthly after the prior month is processed and submitted. Only students listed by the Department of Education's Student Status Confirmation Reports (SSCR) will be charged. Data for this service is gathered through the SURE service process.

Weber & Associates Inc. will establish a website for the institution to provide the institution the opportunity submit information. The VFAO one setup fee will be \$250.00.

In signing below the CONSULTANT and the INSTITUTION'S representative agree to make all professional efforts to accomplish their mutually assigned obligations under this agreement.


 Harry V. Weber President
 Date 5/22/2013


 Kara Coffey
 Midwifery School of Utah
 Date 5/22/2013