EST. 1980
MIDWIVES COLLEGE OF UTAH
MIDWIFING MIDWIVES

MCU provides an educational structure and an integrated learning environment for individuals to become midwives of technical expertise, professional excellence, and personal greatness—namely Midwives of Excellence

TITLE IV POLICY AND PROCEDURE MANUAL

2026

Contents

MCU's Title IV Parameters

The academic calendar/award year for the undergraduate program is non-term. This determination is made based on several characteristics listed in Volume 3, Chapter 1 of the Federal Student aid handbook. Graduate Students using Title IV funds must be enrolled at least half time to retain eligibility for Title IV.

School officials will be responsible for monitoring the completion of the credit hours and confirming the completion of those scheduled hours with the third party servicer.

MCU Title IV Processing Policy

The tuition for students receiving Title IV funds will be calculated at the current tuition rate. Students receiving federal student aid are expected to complete a minimum of 12 credits per 30 week payment period to remain on a disbursement schedule that helps ensure eligibility for a disbursement at the beginning of each payment period. Students who do not earn 12 credits by the end of their 30 week payment period may be required to pay tuition out of pocket until they have earned the 12 credits required for their next disbursement. Students should always complete a minimum of 6 credits per 30 week payment period in order to fulfill the enrollment minimum required of Title IV. Students must open their courses for the trimester within 3 weeks of the start date of each trimester.

Financial aid is awarded under the assumption that you will attend school for the entire period for which the aid was awarded. When you withdraw after receiving financial aid, you may no longer be eligible for the full amount of aid you originally received. If you withdraw after beginning to attend, the amount of financial aid you earned must be determined. Federal law specifies how MCU must determine the amount of Title IV financial aid you have earned, and how much must be repaid. If you received less aid than the amount you earned, you may be able to receive those additional funds. If you received more aid than you earned the unearned funds must be returned.

Transfer Credits and Accreditation

Credits earned at a direct entry midwifery program will not transfer to a CNM program at this time. Some colleges and universities have taken direct entry midwifery program credits in the past, but this is not guaranteed. If you anticipate transferring credits or a degree to another institution, you should contact that institution directly regarding credit transferability. Direct entry

midwifery programs that are accredited by the Midwifery Education Accreditation Council (MEAC) will very often accept credits from other MEAC accredited schools. MCU is MEAC accredited and does accept other MEAC accredited schools transfer credits.

MCU will also accept credits from other institutions accredited by a US Department of Education recognized accrediting agency. Transfer credits must have a C grade or above. MCU follows a trimester format and credits transferred from quarter and trimester systems will be reduced in value accordingly.

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 the same award year, if possible.
2. The Financial Aid Department will also complete an annual review (generally each summer) of the entire Title IV Policy and Procedure manual for currency, and make 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

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
- register with MCU's third party servicer
- demonstrate financial need (for most aid programs).
- be enrolled as a regular student in an eligible program per the current ECAR.
- not be receiving Title IV funds simultaneously in a 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 making satisfactory academic progress (SAP).

Note: This list contains general eligibility factors only.

Implementation Detail

MCU is a non-term credit hour program, as designated by the Department of Education. 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 with the third party servicer prior to making a second disbursement of this student's program.

Financial Aid Advising

MCU's Financial Aid Department is available to counsel students on financial aid options. Contact information is available on MCU's website at https://www.midwifery.edu/staff-faculty/.

Policy
The Financial Aid Department is 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 Detail
One-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.
- Advising is also available through MCU's financial aid information site *"My Student Finances and Financial Aid"* and via official school email

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).

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, SAI, and COA.

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

Credits in Payment Period (12)=1
Credits in Academic Year (24)=2

Weeks in Payment Period (30)=1
Weeks in Program Academic Year (60)=2

Implementation Detail

1. The Financial Aid Department (FAD) creates initial Pell Grant awards.
   - This is done for each student at the beginning of the award year, and again each payment period on a student-by-student basis, using the DOE FAFSA Simplification ACT:
     - A Maximum Pell Grant Award (Max Pell)
     - Student Aid Index (SAI)-calculated Pell Grant, determined by subtracting the student's SAI from the annual published maximum Pell Grant amount
     - A Minimum Pell Grant Award (Min Pell)
   - Awards are input into the third party servicer's "Funding Estimate". 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 "Funding Estimate," 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 2025, use 24-25 ISIR).
2. Second disbursement will be made under the next year ISIR (ex: January 2026, use 25-26 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 SAI may be substituted with unsubsidized loans.

Borrower Based Academic Year: Loan Period is 60 weeks and 24 earned credits. The loan period includes two 30 week/12 earned 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 change from one award letter to the next depending upon changes to the student's SAI, COA, outside sources of aid, grade level, dependency status, annual and aggregate loan limits. To receive the first full-time disbursement, the student must be:

- Scheduled for at least 12 trimester credit hours

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

- Have earned prior 12 trimester credit hours in a minimum of 30 weeks, and
- Be scheduled for an additional 12 trimester credit hours.

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

<u>Implementation Detail</u>

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

1. The Financial Aid Department (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 "Funding Estimate". See General Awarding policy for details on awarding and disbursing.
   - Award letters are maintained electronically.
   a) Students must consent to receiving the direct loan funds by accepting their offered aid in Populi, via the student's Financial Aid page. New borrowers must sign the Master Promissory Note (MPN) and complete 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 Department enters enrollment start date in the "Funding Estimate." The third-party servicer tracks students with a 30-day wait period based on this date.
4. The Financial Aid Department 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 Department 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 Department. This is tracked in the student progress spreadsheet. The Financial Aid Department 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 Department via the Third-Party Servicer.
   - Graduates: Students must provide proof of exit counseling when they submit their graduation application. The President notifies the Financial Aid Department when a

student graduates. Changes are made to the student's NSLDS records by the Financial Aid Department via the Third-Party Servicer.

All loan records are maintained manually in MCU Financial Aid Department 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)

National Student Loan Data System (NSLDS®)

Policy

MCU ensures timely report enrollment statuses to the National Student Data System (NSLDS®) within the required timeframe. Students who enter into an agreement regarding a Title IV, HEA loan will have their loan information submitted to the National Student Loan Data System (NSLDS®) The information will be accessible by authorized agencies, lenders, and institutions. We encourage prospective and enrolled students to check their NSLDS history by logging on to the Student Access NSLDS® website.

Implementation Detail

MCU's Financial Aid Department is responsible for updating NSLDS® enrollment statuses within 30 days of a student status confirmation report from the Secretary. MCU will complete and return that report via NSLDS® to the Secretary within 30 days of receipt; and unless it expects to submit its next student status confirmation report to the Secretary within the next 60 days, notify the Secretary within 30 days if it discovers that a Direct Subsidized, Direct Unsubsidized, or Direct PLUS Loan has been made to or on behalf of a student who enrolled at that school but has ceased to be enrolled on at least a half-time basis.

The Registrar is responsible for notifying the Financial Aid Department of student status changes within 10 business days via email, and the Student Progress Checklist. A list of new upcoming new students is provided to the Financial Aid Department via the Student Progress Checklist no later than two weeks before the financial aid award letter deadline.

Entrance Counseling, Exit Counseling and Master Promissory Note
Policy

MCU is committed to providing students the necessary resources to make informed decisions about federal student loan borrowing. MCU requires that students complete entrance counseling, exit counseling, and sign their MPNs on studentaid.gov. The Financial Aid Department is available to provide students the resources and information to complete those necessary steps.

Implementation Detail

The Financial Aid Department makes every effort to have all students complete and receive confirmation of official entrance and exit counseling. Students are notified that they must sign the Master Promissory Note and complete entrance counseling on studentaid.gov 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. Upon withdrawal or graduation, the Financial Aid Department sends an "Exit Counseling" email reminder instructing students to complete exit counseling on studentaid.gov. Beginning in Winter 2017, all new students are required to successfully complete the Financial Aid Literacy course in their PROD 100 class. For questions regarding the MPN or entrance and exit counseling, office hours appointments by phone with the Financial Aid Department are available by request. As of Summer 2017, students who do not complete exit counseling upon withdrawal will not be able to access their official transcripts.

PROD 1000 Financial Aid Literacy Course: MCU believes that additional entrance counseling in a classroom setting positively correlates with improved financial planning for the student and lower default rate. This session will explore the fundamentals of becoming a federal student aid borrower at MCU. In addition to loan counseling, students will leave the session having a better understanding of the disbursement process and important deadlines, their academic responsibilities as it pertains to eligibility, and a brief training on where to locate financial aid resources on our webpage. Repayment responsibilities and options will be explored as well. This course is required and students must pass its exam. Incoming students may access this training module via My Financial Aid, where they can also explore further financial aid topics relevant to their time at MCU and beyond.

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

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 in Volume 3, Chapter 1 of the Federal Student aid handbook.
- The school's academic year for purposes of Title IV will be 24 earned trimester credit hours and 60 weeks.

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.

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

- Financial Aid, Student Finances, Registrar, the President, Academic Dean, and Clinical Department chair have monthly staff meetings to discuss policy updates, department agendas, student concerns, and department requests.
- VP of Finance & Operations, Student Finances, Registrar, Clinical Department chair, and the Student Services team 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 earned, 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 Services Department 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 Disbursing 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 within two business days 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 third party servicer'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 reviews MCU's student award packages, double checks NSLDS history, 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 the Third Party Servicer's contract of duties, please see Appendix D.

The VP of Finance and Operations reviews student account information, reconciles fiscal records, and attends monthly budget meetings with Student Finances and the President. The VPFO 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 trimester 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 Trimester
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 transmit the student's award package to the Third-Party Servicer and verify that all information has been reviewed and believed to be accurate.	Financial Aid Department	As needed
Third-party servicer will review the award package 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 confirm the current award list that the Third-party servicer verifies. This permits the Third-Party Servicer to pull the funds that will be directed to MCU's federal bank account.	Third-party servicer and Financial Aid	As needed

Financial Aid will send Student Finances Disbursing 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 Disbursing	As needed
Student Finances Disbursing creates a tracking sheet for each student on which monies are disbursed in the order of first trimester of the payment period COP and	Student Finances Disbursing	The day that funds are received into

allowable fees, second trimester of the payment period COP & fees. The balance is returned to the student as a cost of living allowance.		MCU's federal bank account.
Student Finances Disbursing records funds on student account, and notifies student of disbursement.	Student Finances Disbursing	The day that funds are received into MCU's federal bank account.
Student Finances Disbursements collects banking information from students and distributes cost of living allowance via direct deposit. In the event the student doesn't provide banking information, student finances disbursing writes cost of living checks and directs office staff to print and mail check.	Student Finances Disbursing	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 servicer for creation of budgets, keeping track of student's enrollment.	Financial Aid	As needed.

General Awarding, Packaging, and Disbursing
Policy

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

"Core" is an electronic application within the Third Party Servicer 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.

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 credits earned and anticipated enrollment.

2. The Financial Aid Department downloads the student's ISIR from the Third-Party Servicer's CORE system, a secure site that provides services for schools to submit information on students requesting aid.

3. ISIR files are grouped by file type and award year. The system will automatically log the imported ISIR files in real time once they are loaded to the CORE system. The third party servicer uploads these ISIRS to the students files.

4. The Third-Party Servicer monitors new ISIRS that come in and notifies the Financial Aid Department of any change in SAI for the current award year. If applicable, the Financial Aid Department makes award changes based on the new SAI. Over awards must be returned.

5. The Financial Aid Department reviews the ISIRs and checks each student's financial aid history on NSLDS. For ISIRs flagged for verification, see *Verification Policy*.

6. 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).

7. Once the student consents to the award by accepting their aid types in Populi, the Financial Aid Department inputs the student's financial aid information onto a "Funding Estimate," an electronic application within the CORE. The Funding Estimate is the primary way the Financial Aid Department requests the processing of students from the Third-Party Servicer.
   - The students fill out the student initiated file with the third party servicer if planning on receiving Financial Aid with their name, social security number, DOB, program enrolled in, address, phone number, Form of Proof of Graduation, start date with MCU, and Location of MCU. The Financial Aid Department will put in the Student ID, transfer credits, graduation date, remaining credits in Program, scheduled credits and attempted credits for each student. After all this information is added to each student, the Financial Aid Department will process the student and bring it over to the Third Party Servicers Files where we can review ISIR'S and upload all the necessary documents. The Financial Aid Department fills out the Funding Estimate after the student consents to the awards in Populi. The Third Party Servicer will review and approve the Funding Estimate if correct.
   - The Funding Estimate is then electronically signed by the Financial Aid Department and received by the Third-Party Servicer for review. After Funding Estimates have been accepted, students will be added to a disbursement batch.

8. 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 "Disbursement List" that includes each student's name, Social Security number, award year, and payment periods with the amount of Pell and Direct Loans that are scheduled to be disbursed to that student, and the date of that scheduled disbursement.

9. The Financial Aid Department must confirm the Disbursement List.

10. After the Disbursement List is signed, the Third-Party Servicer draws down the funds from G5 into the MCU Federal Bank Account.

11. The Third-Party Servicer sends an electronic receipt to the Financial Aid Department in

the form of "Checks" for each student.

12. The Financial Aid Department maintains these checks electronically.

13. The Disbursement List is then electronically sent to Student Finances Disbursing 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, Subsidized Direct Loans, Unsubsidized Direct Loans, Private Student 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 full disbursements after they have earned 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. Students consent to their loans/grants by Accepting their aid on their Financial Aid page in Populi.

• 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 to their 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.

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.

PJs will not automatically carry over from one award year to the next.
  i. Students must request the same PJs each award year (ex: addition of dependency care costs to SAI).
  ii. 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 Student Aid Index (SAI). MCU provides documentation to third party servicer where they will make the changes to the data elements that determine the SAI, including:
  ● Income
  ● US Income Taxes Paid
  ● Assets
  ● Household Size
  ● Number in College

Rationale

The Financial Aid Department 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. 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. *SAI 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 Department collects supporting documentation, reviews relevant rules and regulations, notifies the President of PJ recommendation.
3. The President reviews the recommendations and supporting documentation, and approves or denies the Professional Judgment request.
4. The Financial Aid Department follows up, as needed, based upon the PJ request. The Third-Party servicer makes changes to the student ISIR if needed.

Special Circumstances

An aid administrator may use PJ on a case-by-case basis to adjust the student's cost of attendance or the data used to calculate his or her SAI. This adjustment is valid only at the school making the change. Students may request an adjustment based on special circumstances. This could include (but is not limited to) the following...

The law gives some examples of special circumstances that MAY be considered (HEA Sec. 479A):

- Change in employment status, income, or assets

- Change in housing status (e.g., homelessness)

- Tuition expenses at an elementary or secondary school

- Medical, dental, or nursing home expenses not covered by insurance

- Child or dependent care expenses

- Severe disability of the student or other member of the student's household

- Other changes or adjustments that impact the student's costs or ability to pay for college

Satisfactory Academic Progress (SAP)

Rationale

All financial aid recipients must maintain Satisfactory Academic Progress (SAP) to remain eligible for Title IV, HEA programs.

SAP evaluations at MCU consist of a qualitative standard only: students must maintain a cumulative GPA of 2.5 or higher. As a non-term institution, MCU is exempt from requiring a quantitative evaluation. However undergraduate students must be on pace to complete their program within 150% of the published length of the program.

For the Associate and Bachelor degree, program length is measured in credit hours. For the Master's degree, length is measured according to minimum program length (in months/years).

Undergraduate SAP Policy

Policy

In order to achieve SAP, the student must maintain a cumulative GPA of 2.5 or higher.

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).

Extensions: If a class is not completed at the time of the SAP evaluation (for example, if a student takes an extension), the class will count as an Incomplete only for SAP purposes. Incompletes are not calculated into a student's GPA. Once the grade posts for the extended

course(s), the grade(s) will be included in the cumulative GPA for all subsequent SAP evaluations.

In order to help students protect their Title IV eligibility, Financial Aid recipients should contact the Financial Aid Department before requesting an extension.

MCU Grade Replacement Policy: Per federal regulations, any grade earned toward a student's degree must count in an SAP evaluation. While under MCU's Grade Replacement Policy, the F grade may be replaced on a student's adjusted GPA on their MCU transcript, the GPA used for Title IV SAP evaluations does take the original F grade into account.

Retaking Coursework: In alignment with Federal Student Aid nonterm school guidelines, students can not receive credit toward a disbursement for retaking coursework that received a D- or better initially.

Implementation Detail

Financial aid recipients will have their progress evaluated every 30 weeks by the Financial Aid Department. This time frame corresponds to the undergraduate Title IV payment period of 30 academic weeks. Academic progress of Title IV students will be conveyed to relevant departments such as the Registrar, Student Finances, and House Mentor.

Important: At Midwives College of Utah, Summer term is no different than our Winter and Fall terms; it is a 15-academic week term in which all students must be enrolled.

Graduate SAP Policy

Policy

In order to achieve SAP, the graduate student must maintain a cumulative GPA of 3.0 or above. Graduate students must also open at least 2 credits per trimester (i.e. be enrolled half-time) to be eligible for Financial Aid:

- Half-time status for Title IV purposes is a minimum of 2 credits/trimester.
- Full-time status for Title IV purposes is a minimum of 4 credits/trimester.

Graduate students enrolled half-time (2 credits/trimester) must complete both credits within the trimester they are opened.

A graduate student who fails to maintain half-time enrollment, or who falls below the 3.0 GPA threshold, will be issued a Financial Aid Warning.

MCU Grade Replacement Policy: Per federal regulations, any grade earned toward a student's degree must count in an SAP evaluation. While under MCU's Grade Replacement Policy, a non-passing grade may be replaced on a student's adjusted GPA on their MCU transcript, the GPA used for Title IV SAP evaluations does take the original non-passing grade into account.

<u>**Implementation Detail**</u>

Evaluations of SAP for graduate students will be conducted at the end of every 15 academic week trimester, and again at the end of the payment period. Academic progress of Title IV graduate students will be evaluated by the Financial Aid Department, and conveyed to relevant departments such as the Registrar, Student Finances, and the Coaching Department. The academic year for Title IV graduate students is defined as 45 weeks, comprising of two 22.5-week payment periods.

Maximum and Minimum Time Frames: Graduate students will naturally need to take more than the minimum number of credits per trimester for some trimesters in order to complete within stated time frames, but the maximum and minimum time frame remains 4 years and 2 years, respectively, and this will align with the proposed major maps.

Graduate Students must also be on pace to complete their program within 150% of the length of the program.

SAP and Incompletes, Withdrawals, Repeats, and Transfer Credits

The following applies to both undergraduate and graduate programs:

Incomplete Grades*:* Credit hours in which a student receives a grade of "I" are included in the number of attempted hours but do not count as successfully completed hours.

Withdrawals*:* Credit hours in which a student receives a grade of "W" are included in the number of attempted hours but do not count as successfully completed hours. Withdrawals are also not included in the student's GPA calculation.

Remedial Courses: MCU does not offer remedial courses.

Transfer credits*:* Transfer credits are included in the total number of attempted hours for the measurement of maximum time frame, but excluded from the GPA calculation. Transfer credits must have a grade of C or higher to count.

Academic Reassessment: The financial aid SAP measurement is always based on the grades and the completion rate of the student's attempted hours, not the adjusted credit total that may result from academic reassessment.

Financial Aid Warning

Upon evaluation at the end of each payment period, undergraduate or graduate students who fail to meet SAP standards will be issued a Financial Aid Warning via internal MCU email system. The student may continue to receive assistance under the Title IV, HEA programs for one payment period (30 weeks) despite determination that the student is not making SAP. 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 following the period 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, below), and

b.) If the student is appealing for the second time, the student must also submit and agree to follow an academic plan approved by the student's House Mentor 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 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 payment 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

An undergraduate or graduate student who has not made SAP while on Financial Aid Warning can appeal to reestablish their 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:

i. Why they haven't met the academic standards required, and

ii. What has changed in the student's situation that will allow them to demonstrate SAP at the next evaluation.

For second-time appeals, the student must also create an academic plan with their House Mentor that will ensure that they will achieve SAP for the next evaluation. The student's House Mentor must approve of this academic plan by signing the student's appeal letter. 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.

Leave of Absence

<u>**Policy**</u>

In the event that a financial aid recipient needs to take a Leave of Absence, the student and school must comply with the following:

All Students: To formally request a Leave of Absence, ALL students MUST:

a) Inform Student Finances, and/or Financial Aid of their request and discuss financial aid implications, as appropriate.
b) Submit a written and signed request to the Registrar for a Leave of Absence and include the following information:
- Beginning and ending dates of the LOA requested
- Reason for the LOA request.

The following are acceptable reasons for a leave of absence: military, medical, jury duty, loss of job, family emergency, employment emergency or other reasons which demonstrate the student's circumstance.

Late requests may be considered for approval if they include an explanation of the unforeseen circumstances that prevented the earlier submission of the request.

Financial Aid Students: Must complete the steps required of ALL STUDENTS and comply with the following:

Financial aid students must contact the Financial Aid Department as soon as possible upon determining that they would like to request a Leave of Absence (LOA) to discuss the impact on student aid. Students who do not return from an approved LOA will have all future loan disbursements canceled. The loan repayment grace periods established on all previously disbursed loans will have begun as of the first day of the student's approved LOA. Therefore, if the student does not return from an approved LOA, the student may have exhausted some or all of the grace period and may be required to enter into immediate repayment on previously disbursed loans. Students will need to contact their lender regarding grace period rules and requirements. If the student does not return following the leave of absence period, MCU will consider the student as having permanently withdrawn and will apply its refund policy.

Please note that your LOA may not exceed 180 days. If your LOA exceeds 180 days, MCU will consider the student as having permanently withdrawn and will apply its refund policy. LOA will be issued in accordance to MCU's policies and procedures located in the handbook.

Withdrawing: Treatment of Title IV Aid When a Student Withdraws

Official Withdrawal: A student may officially withdraw by contacting the Registrar about their intention to withdraw. The official withdrawal date will be the date the student fills out the withdrawal request form. If the student was unable to contact the Registrar due to an extenuating circumstance such as a car accident, the withdrawal date will be the date that the extenuating circumstance occurred.

Administrative Withdrawal: A student will be issued an administrative withdrawal if the student fails to begin attendance in a course within the add/drop period of the start of the trimester without the school's permission. The student is considered a withdrawal for Title IV purposes, and the school will consider the school determined withdrawal date the last day of the add/drop period.

Unofficial Withdrawal: Guided by MCU's Academic Progress Policy, an unresponsive student will be given four weeks to respond to an Academic Probation email and letter. Letter of explanation and intent must be received within four weeks of the probation or the student will be un-enrolled from a matriculated program and considered an unofficial withdrawal for Title IV purposes. The school determined withdrawal date will be the date outlined in the Academic Probation email.

Note: 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 Student Handbook.

To request an official withdrawal, all students must contact the Registrar about their 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/credits in the trimesters for which they are paid.

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:

When no credits have been earned toward payment period: Number of calendar days completed in the period / Total number of calendar days in the payment period.

When credits have been earned toward payment period: Number of credits earned in the payment period / 12 credits

The completion date of the payment period must be projected based on the student's progress as of the withdrawal date.

If a student did not receive all of the funds that the student earned, the student may be due a post-withdrawal disbursement. Per Department of Education guidance: "A school must offer any post-withdrawal disbursement of loans funds within 30 days of the date of the school's determination that the student withdrew, and return any unearned funds and make a post withdrawal of grant funds within 45 days of that date."

If the post-withdrawal disbursement includes loan funds, the school must get the student's permission before it can disburse them. The student will receive this request for permission via email from the Financial Aid Department. The student will have 30 days to either confirm the disbursement to the student account or the direct disbursement of a post-withdrawal disbursement. The notification must make it clear that if the student or parent does not respond to the notification within the time frame, the school is not required to make the post-withdrawal disbursement.

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:

      a.)   The student's institutional charges multiplied by the unearned percentage of the student's funds, or

      b.)   The entire amount of excess funds.

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.

Per Department of Education guidance, a school must return Title IV funds to the programs from which the student received aid during the payment period or period of enrollment as applicable, in the following order, up to the net amount disbursed from each source:

- Unsubsidized Direct Loans (other than Direct PLUS Loans)
- Subsidized Direct Loans
- Federal Perkins Loans
- Direct PLUS Loans
- Federal Pell Grants for which a return of Title IV funds is required
- FSEOG for which a return of Title IV funds is required
- TEACH Grants for which a return of Title IV funds is required
- Iraq and Afghanistan Service Grant, for which a return of Title IV funds is required

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.

Verification Policy
Policy

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

1. The Third-Party Servicer and the MCU Financial Aid Department (FAD) 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.
1. FAD notifies students by email if they have been selected for verification by Central Processing System. When selected FAD instructs the student to complete the Third-Party servicer verification worksheet and provide supporting documentation.
2. The student submits all required documentation to FAD. FAD forwards this to the Third-Party Servicer.
3. Third-Party Servicer performs the verification.
   - If additional follow-up is needed, the Third-Party servicer informs FAD. FAD will contact by email the student until the application is considered complete.
   - If verification is determined to be complete, the Third-Party servicer informs FAD. FAD 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 FAD receives internal information that conflicts with the ISIR. FAD will request documentation by email, as appropriate, to resolve the conflicting information and forward this to the Third-Party Servicer for review.

The Third-Party Servicer has a full-time verification manager that oversees the department and has successfully trained a staff to identify all aspects of verification per the regulations set forth by the Department of Education:

- Implemented a "File Review" system process that identifies all areas that need analysis on all ISIRs imported in to our system to prevent human error during the file review process of ISIRs
- Consolidated the verification team to only employees who perform verification, and no additional tasks so that those employees remain up-to-date and focused on the verification process as a whole
- Updated all verification documentation to not only reflect what the Department mandates, but also to make all verification easier to interpret for schools, students, and their own verification specialists.

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

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

TITLE IV CREDIT BALANCES POLICY

Paying Student Credit Balances

Policy

Midwives College of Utah's (MCU) policy on paying all student credit balances is modeled after the requirements of Title IV student credit balances. A Title IV credit balance occurs whenever MCU credits Title IV program funds to a student's account and those funds exceed the student's allowable charges for the payment period.

Implementation

MCU pays by check or direct deposit the excess Title IV program funds (the credit balance) as well as credit balances not related to Title IV funds directly to the student as soon as possible, but no later than *14 days after*:

- The date the balance occurred on the student's account, if the balance occurred after the first day of class of a payment period; or
- The first day of classes of the payment period if the credit balance occurred on or before the first day of class of that payment period.

Treatment of Title IV Credit Balances When Student Withdraws

Policy

This treatment applies only to the handling of Title IV credit balances when a student withdraws.

Implementation

When a student withdraws from MCU during a trimester, a Title IV credit balance is handled as follows:

- MCU does not release any portion of the Title IV credit balance to the student, and does not return any portion to the Title IV programs prior to the performing of the Return Calculation by MCU's Financial Aid Department.
- Financial Aid Department performs the Return Calculation, including any existing Title IV credit balance for the period in the calculation as disbursed aid.
- Any applicable refund policy (state, accrediting agency, institution, etc.) is applied to determine if doing so creates a new or larger Title IV credit balance.

Title IV credit balances are then allocated as follows:

- Any Title IV credit balance must be allocated first to repay any grant overpayment owed by the student as a result of the current withdrawal.
- MCU must return such funds to the Title IV grant account within 14 days of the date MCU performs the Return Calculation. (Although not included in a Return Calculation, any Title IV credit balance from a prior period that remains on a student's account when the student withdraws is included as Title IV funds when MCU determines the amount of any final Title IV credit balance when a student withdraws.)
- MCU must use the final credit balance first to satisfy any current student grant over payment.
- Within 14 days of the date that MCU performs the Return Calculation, MCU pays any remaining Title IV funds.

Holding Credit Balances

Policy

MCU may hold excess FSA funds (credit balances) if it obtains a voluntary authorization from the student or parent.

Implementation

Because FSA funds are awarded to students to pay current year charges, notwithstanding any authorization obtained by MCU from a student of parent, MCU must pay:
- Any remaining balance on loan funds by the end of the loan period, and
- Any other remaining FSA funds by the end of the last payment period in the award year for which they were awarded.