



# **Title IV Policy and Procedure Manual 2025 - 2026**

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## About this Manual

This manual contains policies and procedures for managing Nossi College of Art & Design's Federal Student Aid program. It was developed using recommendations from the Department of Education's Federal Aid Administrator's assessments tools.

## Maintaining Title IV Policies and Procedures

Nossi College of Art & Design Financial Aid Department and the President & CEO develops and maintains the Nossi College of Art & Design Title IV Policy and Procedure Manual using a semi-annual (December and May) review process. This process reviews the entire manual for currency and makes updates and/or corrections as needed. When a correction is needed outside of the regularly scheduled review, it will be brought up during staff meetings. All staff will have an opportunity to participate. The President & CEO and any relevant departments may meet further to discuss the changes/corrections. The Financial Aid Department collaborates with the Marketing Department to ensure required changes are made to the Policy and Procedure Manual, the Nossi College of Art & Design website and the catalog.

## Adequate Title IV Checks and Balances, Staffing and Separation of Duties

### Policy

The procedures for the awarding and disbursing of federal student aid have been divided into three branches: Financial Aid, Business Office, and Nossi College of Art & Design's Third-Party Servicer, Gemcor.

All other departments within Nossi College of Art & Design are responsible for conveying information that may impact upon student aid eligibility to the Financial Aid Department.

- Financial Aid, Student Finances, Director of Academic Operations, the President & CEO, Vice President for Academic Affairs, and Program Directors/Chairs (if applicable) have semester staff meetings to discuss policy updates, department agendas, student concerns, and department requests.
- Financial Aid, Director of Academic Operations, President & CEO, Program Directors/Chairs, and the Vice President for Academic Affairs meet weekly to discuss student progress. Student progress is tracked electronically on a "Student Progress Checklist" within a Google Document available to these departments.
- President & CEO, Vice President for Academic Affairs, and Program Directors/Chairs have mandatory Faculty Meetings semesterly to update the Faculty on any policy and or procedure changes.

### Procedure

Nossi College of Art & Design ensures that there are adequate checks and balances, and

staffing, to meet the Department of Education's requirements for institutional eligibility and administrative capacity.

The Director of Academic Operations is responsible for tracking, admissions information, enrollment, leave of absence, credits attempted and completed, withdrawals and drops, and Satisfactory Academic Progress. The Director of Academic Operations is responsible for informing the Financial Aid Department of any changes that may impact student eligibility.

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.

The Business Office maintains strict records that comply with the standards of the Department of Education. The Business Office receives the Award Journals from Gemcor which outlines the funds directly deposited into the Federal Funds bank account from Gemcor/Department of Ed. The Business Office requests confirmation from the President & CEO that the funds have been deposited into the Federal Funds Account. The Business Office uses the Award Journal to post Title IV funds to student accounts. Once those funds are posted, the Business Office gives the Daily Award Journal to the President & CEO so they can move the funds from the Federal Funds account to the Main operating account. The funds are transferred from the Federal Funds account to the Operating Account within 1-3 business days after receipt of funds. Once the transfer is complete, the President & CEO returns the Daily Award Journal with an ACH payment receipt that shows the funds were moved accordingly. Each month, the Business Office also submits the required bank statements from the Federal Title IV bank account to the financial analyst/accountant and Gemcor for reconciliation. The Business Office in cooperation with the Financial Aid Office reconciles the Federal Funds bank statement and the Daily Award Journals showing received Title IV funding on a monthly basis.

Nossi College of Art & Design's Third-Party Servicer, Gemcor, downloads ISIR records, reviews Nossi College of Art & Design's student requested/approved federal aid, send originations and disbursements through COD, reconciles Pell Grants including MRR and POP records, confirms signed MPNs, Entrance Counseling, Exit Counseling and draws down funds in G6.

Gemcor's contract of duties, see following page.



**GEMCOR, Inc.**

**Institutional Servicing and Software**

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**Email Address:**  
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## **Servicing Agreement**

This agreement is made on this 1<sup>st</sup> day of July 2019, between GEMCOR Inc., an Illinois corporation, hereinafter referred to as GEMCOR, and *Nossil College of Art*, hereinafter referred to as the SCHOOL. Both parties hereby agree to the following terms and conditions of this agreement:

### **Section 1 : Programs**

A. GEMCOR agrees to provide consulting and data processing services to assist the SCHOOL in the administration of the programs listed below using commonly accepted accounting and federally mandated program procedures;

- i. Federal Pell Grant Program
- ii. Federal Campus Based Programs
- iii. Federal Direct Student Loan Program

### **Section 2 : Responsibilities of the Parties**

A. GEMCOR agrees to provide the following services to the SCHOOL under this agreement:

- i. Provide the SCHOOL with technical support concerning the administration of Title IV programs.
- ii. Maintain safeguards to protect Title IV recipient information in GEMCOR's possession from access by unauthorized persons; password protect and encrypt email transmissions by GEMCOR of data containing personally identifiable information; ensure compliance with the provisions of the Family Educational Rights and Privacy Act regarding Title IV recipient information in GEMCOR's possession.
- iii. Review verification and "C" code material on ISIRs containing verification or "C" code flags in accordance with federal guidelines except when the SCHOOL approves such files under its own authority.
- iv. Process Title IV program awards including the determination of student awards, preparation of daily award journals, and daily submission of all award origination records to the COD System.
- v. Initiate requests for the electronic transfer of Title IV funds into the SCHOOL's federal funds checking account for the purpose of disbursement of said funds to eligible students by the SCHOOL.
- vi. Monitor an individual federal checking account for the SCHOOL including sequential transaction numbers for tracking and audit trail purposes as well as reconciliation of the account's monthly statements.
- vii. Prepare, and electronically transmit daily to the USDE, information supporting the institution's disbursement or return of HEA, Title IV federal student financial assistance funds to eligible recipients.
- viii. Update and alert the SCHOOL of changes in federal regulations and statutes, which affect the programs covered under this agreement, through seminars, newsletters, special bulletins, and electronic mail.
- ix. Provide the SCHOOL with access to, and use of, GEMCOR's TEAM Software System for the purposes of packaging and maintenance of students' awards for the programs listed in Section 1 of this agreement. GEMCOR will provide the SCHOOL with unlimited user accounts with TEAM System access.
- x. Transmit electronic corrections of ISIR data to the Central Processor if the SCHOOL uses GEMCOR's destination point for ISIR correction transmissions.
- xi. Provide the SCHOOL with training and support regarding compliance with the requirements of the NSLDS Enrollment Reporting process.
- xii. Prepare and provide the SCHOOL with annual audit packages containing award information and evidence of Title IV award and fund reconciliations for use by the SCHOOL's CPA during required compliance audits.
- xiii. Prepare and file the SCHOOL's annual Fiscal Operations Report and Application for Funds (FISAP) with data supplied by the SCHOOL and from GEMCOR's internal records.
- xiv. Confirm the eligibility of Title IV recipients with the SCHOOL at the point the SCHOOL reports a disbursement of Title IV, HEA funds, including a periodic examination by GEMCOR of sampled recipient files in accordance with federal regulations at 34 CFR 668.164(b)(3).
- xv. Provide the SCHOOL, upon its request, with TRAX® Student Records Tracking System Software, including unlimited technical support, maintenance, and non-customized upgrades, allowing the SCHOOL to license and use said software for the computerized management of on-campus student records. A separate use license is required for each campus operated by the SCHOOL.
- xvi. Have an internal control audit performed on GEMCOR's systems and on the compliance of its procedures with federal regulations. Such audit will be performed by a Certified Public Accounting firm annually and shall include the required Servicer Information Sheet which further describes the responsibilities of the SCHOOL and GEMCOR relative to Title IV, HEA program administration.
- xvii. Except as limited by the terms of Section 6(B) of this agreement, provide the SCHOOL with access to any and all of its records relating to the administration of Title IV, HEA program funds by GEMCOR for purposes of inspection, examination, audit, or other form of review to ensure administrative compliance.
- xviii. Provide the SCHOOL with a Client Procedure Manual further outlining and describing the responsibilities of each party with respect to the administration of the Title IV, HEA program(s) listed in Section 1.

B. In accordance with the compliant administration of Title IV, HEA program funds, the SCHOOL's responsibilities include but are not limited to:

- i. State licensure, accreditation, and USDE eligibility and certification for facilities and programs.
- ii. Institutional policies and procedures
- iii. Consumer information
- iv. Student contact, advisement, and training
- v. Packaging Title IV aid using GEMCOR's TEAM Software System
- vi. Attendance and academic progress documentation and evaluation
- vii. Confirmation of student eligibility
- viii. Disbursement of federal student aid to eligible recipients
- ix. On-campus staff management
- x. Withdrawal determination and calculations
- xi. Payment of federal and non-federal refunds
- xii. Placement and enrollment services and reporting
- xiii. Protection of personally identifiable information (PII) from unauthorized access

General Division of Responsibilities	Person responsible	Required Date
Financial Aid Department/Nossi College of Art & Design notifies all current students to file the FAFSA on October 1 <sup>st</sup> of each year with instructions including the tax year used on the FAFSA.	Financial Aid Department and the Marketing Department	October 1st
Financial Aid Department reviews the student's FAFSA and academic record to verify student's eligibility. Financial Aid also checks the student's loan and grant history before awarding. Director of Academic Operations notifies Financial Aid of enrollment changes.	Financial Aid Department/ Director of Academic Operations	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 inputs the student's award package into the Semester Roster, Gemcor and software system and verifies all information was reviewed and believed to be accurate. Up to 10 days before classes start each semester, Financial Aid approves Title IV funds in Gemcor	Financial Aid Department	As needed
Gemcor will review the requested/approved aid for errors and work with Financial Aid to correct any errors. Gemcor then sends originations and disbursements to COD and draws down funds from G6.	Third-party servicer / Financial Aid	After students' award packages are in the system
Gemcor deposit from G6 into the Nossi College of Art & Design Federal Bank Account and notifies the Business Office providing a Daily Journal.	Gemcor/Business Office	As Needed
Business Office in cooperation with the Financial Aid Office reconciles aid as it come in. They also reconcile monthly.	Financial Aid and Business Office	As needed and monthly reconciliation
Business Office 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 an overage check.	Business Office	When funds are received in Nossi College of Art & Design's federal bank account
Business Office records funds on student account, notifies student of disbursement, and enters disbursement into Quick Books.	Business Office	The day funds are received into Nossi College of Art & Design's federal bank account
Business Office produces overage checks and checks are made available to students.	Business Office	After discussion with student

## Institutional Eligibility

## Policy

Basic criteria to be an eligible institution to participate in Federal Student Aid, a school must.

- Be legally authorized by a state to provide a postsecondary education program in that state.
- Be accredited by a nationally recognized accrediting agency or have met the alternative requirements, if applicable, and
- Admit as regular students only individuals with a high school diploma or its recognized equivalent or individuals beyond the age of compulsory school attendance in the state where the institution is located.

Nossi College of Art & Design meets all above criteria.

- The President ensures that Nossi College of Art & Design is legally authorized to provide postsecondary programs in all states in which the institution is considered to have a presence.
- Nossi College of Art & Design is accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC).
- Our admissions process only enrolls individuals with a high school diploma or its recognized equivalent.

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

## Procedure

Nossi College of Art & Design saves a copy of its E-App (with date submitted) and all supporting documentation electronically in the Nossi College of Art & Design Google Drive.

The signed Program Participation Agreement Form (PPA), E-APP and ECAR is printed and kept in the locked file cabinet at the Nossi College of Art & Design offices.

## **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. Nossi College of Art & Design ensures eligibility requirements are met before awarding and disbursing of FSA funds.

All students qualifying for Title IV Aid must:

- have a complete and approved Free Application for Federal Student Aid (FAFSA) on file with Nossi College of Art & Design.
- 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
- be a U.S. citizen or eligible noncitizen.
- be registered with Selective Service, if required.
- be making satisfactory academic progress (SAP).
- not be in Default on federal loans.
- have not exceeded Pell Grant LEU or Loan Eligibility.

Note: This list contains general eligibility factors only.

### **Procedure**

The Financial Aid Office using the above criteria to review each student file and awards aid based on twelve credit hours. Twelve credit hours are considered full time for Title IV purposes. The Director of Academic Operations is responsible for monitoring the scheduled hours. Financial Aid is notified of any reduced credit hours and adjusts aid accordingly as needed. A student's initial award will be disbursed at the start of first term of the academic year.

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. Any C flags (ex. SSA Cannot confirm U.S. Citizenship, Pell LEU close or at limit, Loan eligibility close or at limit) will be documented and resolved before awarding. For citizenship status issues we would require current immigration documentation such as Permanent Resident Card, U.S. Passport etc. NSLDS Loan and Pell history would be printed and reviewed for each student that shows usage on the ISIR. Documentation will be scanned into the student information system.

## **Cost of Attendance - Creating Budgets**

### **Policy**

The Higher Education Act (HEA) of 1965 defines the cost of attendance (COA) components of all Title IV programs. These components have both direct and indirect expenses that are considered when a student attends college. The HEA specifies the components to be included. The COA must be used in determining a student's eligibility for Title IV financial aid funding. The policy requires a school periodically review and update the COAs if necessary. The components of the budget determinations must be fully documented and appropriate.

### **Procedure**

Each aid year in the month of December, the Financial Aid Office and the President & CEO will review the COAs and update the appropriate components. Any adjustment is based on predicted cost or cost increases (tuition, fees, books and supplies, room and board, transportation, misc. personal expenses). Nossi College of Art & Design charges a flat rate fixed tuition by program. The tuition charged each semester does not change with the number of enrollment hours (however, Pell Grant and loan eligibility are based on enrollment

hours). A student's tuition does not increase if they stay continuously enrolled.

Worksheets will be used yearly for each COA that is prepared. The worksheet includes an area for details to document the process in determining the component amounts. Research and documentation will be attached to the worksheet for confirmation of the amounts calculated. The final COAs will be prepared on an excel spreadsheet. The COAs will be based on 30 weeks teaching/instruction for an academic year (2 semesters). The COAs will represent a modest budget by which a student can reasonably live while attending Nossi College of Art & Design. The COAs are provided to Gemcor (Third Party Servicer). Components to the COA can only be altered for an individual student through a Professional Judgment.

## Financial Aid Advising

### Policy

The Financial Aid Department is responsible for providing financial aid advising. This policy is intended to describe the various means Nossi College of Art & Design uses to inform students of their rights and responsibilities with regards to federal student aid funding.

### Procedure

#### One-on-One Advising Appointments

- Students are informed of their financial aid opportunities and options either in person or by phone for both incoming new students and continuing students
- Advising is generally by appointment but can happen by drop in/on demand as well.

#### Written Guidance

- New and continuing students must accept what aid they choose and sign their financial aid offer which also includes terms and conditions of the aid.
- The college catalog (printed and on the Nossi College of Art & Design website): contains general information about the financial aid programs, including how to apply, costs, relevant policies and procedures (ex: Satisfactory Academic Progress).

## Verification

### Policy

Student ISIRS may be selected for verification by the Department of Education or by Nossi College of Art & Design. Applications are not considered complete, financial aid offer letters will not be prepared and federal aid will not be disbursed, until verification is completed. Therefore, any financial aid is based on the post verification approved SAI.

### Procedure

1. Nossi College of Art & Design Financial Aid Department 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. Nossi College of Art & Design Financial Aid notifies students by email if they have been selected for verification. When selected, Nossi College of Art & Design instructs the student to complete the verification worksheet and use the IRS Data Link on the FAFSA if needed. Nossi College of Art & Design may also request documentation which could include IRS Tax Transcripts, W2s etc.
3. Once all required documentation is received, Nossi College of Art & Design Financial Aid Office completes the Verification process using the Nossi College of Art & Design Verification Checklist and if the IRS Data Retrieval Tool was not used, the IRS Tax Return Matrix.
4. The student submits all required documentation to Nossi College of Art & Design. Nossi College of Art & Design reviews and processes verification for each student that is selected. The Verification Checklist has a place to mark when Verification is complete and the approved transaction number that the Title IV aid will be paid on. The ISIR is marked "approved" in Gemcor and then Gemcor only allows aid to be paid from that transaction (locking ISIRs).

ISIRs may also be selected for verification if the Nossi College of Art & Design financial aid department receives information that conflicts with the ISIR. Nossi College of Art & Design will request documentation by email, as appropriate, to resolve the conflicting information. Any conflicting information will be resolved before a Financial Aid Offer letter is prepared.

If additional follow-up is needed, Nossi College of Art & Design will contact the student by email until the application is considered complete.

Once verification is determined to be complete, Nossi College of Art & Design notifies the student by email if the SAI and Title IV aid changes and proceeds to the Financial Aid Offer Letter. When Title IV Aid is requested/approved in Gemcor, the Nossi College of Art & Design Financial Aid Office documents in Gemcor that Verification is approved (completed).

Locking ISIRs: When Verification is complete and aid is entered into Gemcor, we mark that transaction as "approved" (showing Verification is complete) and Gemcor essentially "locks" the ISIR and only allows Title IV aid to be paid on that transaction. Subsequent transactions are still reviewed for issues such as C flags etc.

## Professional Judgment

### Policy

Professional Judgments (PJs) may be made in limited, unusual circumstances on an individual case-by-case basis and would not include students identified as a "group." The Financial Aid Administrators are eligible to make PJ decisions. The Financial Aid Department is responsible for maintaining documentation for all requests and decisions, regardless of the outcome. Together, the Nossi College of Art & Design Financial Aid Administrators review each Professional Judgment request on a case-by-case basis.

Nossi College of Art & Design will complete verification on the student's ISIR prior to implementing a professional judgment request. This does not apply to a Dependency Override.

Nossi College of Art & Design will resolve all Conflicting Information prior to reviewing a professional judgment request.

It is the responsibility of the student to seek PJ requests. Nossi College of Art & Design will not seek out students with unusual circumstances to recommend PJ requests.

Nossi College of Art & Design's Financial Aid Office will use guidance by the Department of Education in reviewing PJ requests and will never use PJs to intentionally circumvent the law or regulations.

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 SAI).
- Nossi College of Art & Design may make the same adjustment for multiple years provided that acceptable documentation is provided each time.
- Nossi College of Art & Design will not make direct changes to the Student Aid Index (SAI). Nossi may make changes to the data elements that determine SAI, including:
  - Income
  - US Income Taxes Paid
  - Assets
  - Household Size
  - Number in College

### **Procedure**

To request a professional judgment, students must contact the Financial Aid Office. Students must provide documentation to substantiate the request. Examples are:

- Needs Analysis Request (data elements): account statements, receipts, letters from providers, tax documents, proof of out-of-pocket expenses, letter of change/termination of employment, divorce/separation decrees, death certificate.
  - Dependency Override Requests: letter from a third party, letter from a person of authority (ex: member of clergy, caseworker, counselor, teacher) and a detailed letter from the student requesting a Dependency Override.
1. To evaluate the requests, the Financial Aid Office collects supporting documentation, reviews relevant rules and regulations.
  2. Professional Judgments are implemented by the Financial Aid Department through the FAFSA Partner Portal.
  3. Students are informed by email of the decision to approve or deny the request. If approved, they are informed of the results and how it affected their financial aid.

## **General Awarding/Packaging and Disbursing**

### **Policy**

Nossi College of Art & Design packages aid in accordance with federal regulations and guidance published in the Federal Student Aid Handbook. Nossi College of Art & Design

Financial Aid Department will not award Title IV aid until Verification is completed, Conflicting Information is resolved, and we have a clean/approved ISIR. Nossi College of Art & Design awards using Federal Methodology.

### **Procedure**

1. The Financial Aid Department monitors potential financial aid applicants in two ways:
  - New Students: whether an Institutional Student Information Record (ISIR) was received.
  - Continuing Students: eligibility based on credit completion, anticipated enrollment and ISIR has been received.
2. The Financial Aid Departments reviews the ISIRs and any C flags or ISIR issues are resolved. For ISIRs flagged for verification, see Verification Policy. The Financial Aid Advisors checks each student's financial aid history on NSLDS for Pell LEU and Loan eligibility. For continuing students, transcripts are also reviewed to determine number of credit hours/classes earned.
3. If the ISIR is deemed clean and approved, the Financial Aid Department determines the student's eligibility and issues the student an official Nossi College of Art & Design financial aid offer (see "Financial Aid Offer Process" below).
4. If a student/parent chooses to use Title IV aid to directly pay some or all their Music City Housing, LLC charges, an Authorization form will be on file. (See "Identifying Credit Balances and Waivers" section for complete details on Music City Housing, LLC charges). In addition to tuition and fees, rent from Music City Housing, LLC will be included as a charge on the financial aid offer with an authorization in place.
5. The roster is completed and maintained by the financial aid department and kept up to date with any changes. Prior to the start of the new semester. the Director of Academic Operations will provide the financial aid and business office with a list of new enrollments, graduates, transfers, re-enrolls, and students who are making a program change. With this information the business office will add to the student's ledger any applicable registration or graduation fees. The financial aid office will verify that these fees match the roster. The financial aid office prior to the start of a new semester will do a graduate ledger review to ensure all tuition, and F and I grades that need to be charged and any transfer classes that need to be credited are updated on the roster. The financial aid office will give any updates to the business office to make the appropriate posts to the student's ledger The credit/charge report from the SIS will be used as checks/balance to assure the tuition, fees and credits were posted to the student's ledger.
6. After funds are requested/approved in Gemcor, Gemcor reviews for errors and works with the Financial Aid Office to correct errors. Gemcor processes all origination and disbursement records through COD. Gemcor draws down the funds from G6 into the Nossi College of Art & Design Federal Bank Account.
7. Gemcor creates a Daily Journal report showing what is drawn down and deposited from G6 and is sent to the Business Office. Report includes name, social security number, aid type and net amount disbursed. The Business Office uses the Daily Journal report to post funds to student ledgers. See "Reconciliation" for total Disbursement and Reconciliation process flow.

### **Financial Aid Offer Process**

- Nossi College of Art & Design Financial Aid Department will not award Title IV aid until Verification is completed, Conflicting Information is resolved, and we have a clean/approved ISIR.
- Ensure that the student has completed Entrance Counseling and Master Promissory Note if student has indicated they will use a Direct Loan. If a Parent applies for a Parent PLUS loan we ensure we have the results and if approved the Parent MPN is on file as

well. These are kept at both Nossi College of Art & Design and Gemcor.

- Financial Aid Advisors determine what the student is eligible for using the FAFSA results including the SAI, NSLDS loan history and grant history, transcripts (grades) etc.
- Students receive a notification on their student portal or meets with Financial Aid in person to accept any offered aid that they choose to use before the aid is processed.
- Once a student has finalized the aid they choose to use, Nossi College of Art & Design Financial Aid Advisors input the approved funds into the student information system, the Roster and in Gemcor.

### **Posting Process**

#### **Gemcor**

Daily, Gemcor transmits disbursement information received from its client schools to the COD. After the disbursement information is received back the next day from the COD, Gemcor draws down the funds from G6 and sends a disbursement notification, known as the Daily Award Journal to the Business Office. The school uses the date of the disbursement notification as the posting date on the student's account ledger and posts the funds within three days of receipt. Since the disbursement information is sent to COD prior to posting the disbursement to the student's account ledger, the process is in compliance with the 15-day rule.

#### **Business Office**

Nossi College of Art & Design ensures student ledger accounts accurately record all of the student's fiscal activity. In the posting function, the Business Office receives the Daily Award Journal from Gemcor and begins processing funds in the Student Information System (SIS, here after) based on the batches listed in the award journal. The Business Office and the Financial Aid office work together to ensure that the Daily Award Journal matches the SIS and the Financial Aid Roster before funds can be posted. When processing each batch, the Business Office checks to make sure the batch total matches the amount on the Daily Award Journal. The Business Office prints a batch report from the SIS that provides the students name, the amount of funds posted, and the fund source and again checks to ensure both the Award Journal and the SIS match. In addition, cash payments, scholarships, and any other funds received are posted to the student's account ledger in chronological order as individual entries with a running account balance. If a Title IV credit balance results, the Business Office will issue an overage/stipend check to the student within 14 days.

## **NSLDS**

NSLDS (National Student Loan Data System) is accessed only by Nossi College of Art & Design Financial Aid Advisors and the IPEDS Keyholder for school reporting purposes. NSLDS is a centralized, integrated view of a student's Pell Grants and Title IV loan history. They are tracked from the first approval through closure. Financial Aid Advisors use this information when preparing aid for each academic year, to review when determining a student's eligibility if the system generates a new ISIR flagging Pell LEU or loan limits etc. NSLDS information is also used and provided to the student for both Entrance and Exit Counseling.

Students can view their personal NSLDS information by logging into studentaid.gov. Their profile will provide personalized information such as federal student loan balance, disbursement dates and loan servicer contact information.

## Attendance Verification

### Policy

Nossi College of Art & Design is an attendance taking institution.

### Procedure

A student begins earning Title IV funding on the first day of classes. Instructors enter the students' attendance in Moodle, the LMS system, each day. The Director of Academic Operations pulls the attendance from Moodle to enter into the SIS. The Director of Academic Operations will run an attendance report on Thursdays. Each week a list of "at risk" students will be discussed in the Friday Retention meeting and a course of action will be discussed for each student.

## Satisfactory Academic Progress

### Policy

See Nossi College of Art & Design School Catalog printed or on digital version on the [nossi.edu](http://nossi.edu) website.

### Procedure

The Director of Academic Operations manages Satisfactory Academic Progress. They notify Financial Aid of any student that is dismissed because of SAP. Financial Aid would then start the Exit Counseling (Withdrawing at the end of a semester and not returning) process for that student.

Each semester after all final grades have been entered into the student information system, the Director of Academic Operations will run a cumulative GPA report as well as a credit completed report. Utilizing the SAP policy, the Director of Academic Operations evaluates all students' cumulative GPAs and earned percentage of credits. Those who met requirements noted on the SAP policy remain in good academic standing. Those who fall below the requirements listed on the SAP policy (too low a cumulative GPA and/or not reaching the required percentage of credit hours) will be placed on academic warning. The Director of Academic Operations will then send the student a letter and an email notifying them that they have been placed on academic warning. The letter and email will state which criteria they did not meet which caused them to be placed on academic warning. The student is required to meet with the Vice President of Academic Affairs to sign their semester academic plan. The plan will help the student understand what grades they will need to earn during their warning period to be placed back on satisfactory progress.

The Director of Academic Operations will re-evaluate the student's cumulative GPA and percentage of credit hours earned at the end of the student's warning period. If the student has reached the criteria as noted in the SAP policy, they will be placed in satisfactory

academic standing. The Director of Academic Operations will notify the student of their new status via mail and email. If the student does not meet the criteria set in the SAP policy the student will be academically dismissed and withdrawn prior to the following semester. The Director of Academic Operations will notify the student of their new status via mail and email.

An academically dismissed student who meets the criteria to return will return on academic probation. The student will have up to two semesters to reach satisfactory academic standing. The student will meet with the Vice President of Academic Affairs to go over their new semester academic plan. At the end of the probation period, the Director of Academic Operations will review the student’s cumulative GPA and percentage of credits hours earned. If the student is on a two semester plan the Director of Academic Operations will review after the first semester back, to determine if the student can reach satisfactory academic progress by the end of the second semester. The Director of Academic Operations will notify the student by mail and email if they are on pace to reach satisfactory academic standing or if they will be academically dismissed. If a student’s academic plan is for one semester, the student will either meet criteria to be placed in satisfactory academic standing or the student will be academically dismissed. The Director of Academic Operations will notify the student via mail and email of their new status.

## Federal Pell Grant

### Policy

The Federal Pell Grant is designed to help pay college-related expenses. The exact dollar award is determined by congress. The amounts can change yearly. Funds are calculated each year based on:

- the student’s Expected Family Contribution SAI (from an approved ISIR and verified if selected)
- the Cost of Attendance
- the number of enrolled hours the student is attending in each term for classes required for the major.

### Procedure

Initial Calculation: The initial calculation of the Federal Pell Grant would be done when we have a student’s approved ISIR (all issues resolved including C Flags, Verification, etc.). We would use the enrollment status of full time if estimating the Pell Grant or the actual enrollment status if available. NSLDS Pell Grant history is reviewed for each student before awarding to review Pell LEU.

For federal student aid purposes, full-time enrollment for programs offered in standard terms is 12 credit hours. Below is a chart of enrollment intensity relative to full-time. Note that enrollment intensity cannot exceed 100% for purposes of Pell Grant proration.

Credit Hours	Enrollment Category (Old)	Enrollment Intensity (New)
12 (or more)	Full-Time	100%
11	Three-Quarter Time	92%
10		83%

9		75%
8	Half-Time	67%
7		58%
6		50%
5		42%
4	Less-than-Half-Time	33%
3		25%
2		17%
1		8%

Year-Round Pell allows a student to receive Federal Pell Grant funds for up to 150 percent of the student's Pell Grant Scheduled Award for an award year but not more than 3 disbursements. This provision is effective beginning with the 2017–2018 award year.

**Pell Grant Recalculations:** Pell Grant Recalculations happen if a student's enrollment hours change during the drop/add period and the change would affect the amount of Pell Grant the student was initially awarded. Pell Grants are also affected if a student withdraws during a semester before the student has earned 100% of the value of their federal Title IV aid. This would be recalculated in processing a Return of Title IV Funds (R2T4).

**Book Disbursement:** Students are responsible for purchasing their own books. Nossi College of Art & Design does not have a bookstore. Nossi College of Art & Design does not receive any Title IV funds at the college before the start date of a semester. Overage checks are made available within 14 days of the start date of a semester.

## 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 30 weeks and 24 credits. The loan period includes two 15 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 SAI, COA, outside sources of aid, grade level, dependency status, annual and aggregate loan limits. Students who only have 15 weeks in their academic year instead of 30 weeks, will have their loans prorated (for example: graduating students).

### Procedure

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 Advisor creates initial Direct Loan awards.
  - This is done for each student on a case-by-case basis.
  - Students must consent to receiving the direct loan funds. Consents are stored electronically in Nossi College of Art & Design's internal student information system.
  - Awards are input into the third-party servicer's software, as well as the student information system.
  - Award letters are maintained electronically.
2. Students are notified that they must complete the MPN and entrance counseling with their initial award estimate.
  - Nossi College of Art & Design and Gemcor confirms completion of the MPN and entrance counseling electronically. Funds are not released until confirmation has been received.
3. The third- party servicer reviews all awards and all adjustments and follows up with Nossi College of Art & Design as needed. The Financial Aid Office makes any award adjustments as needed.

## Entrance Counseling

### Policy:

It is a requirement by the Department of Education that any student that will receive federal loans must complete Federal Entrance Counseling (and the MPN Master Promissory Note) before the first disbursement of a federal loan. Nossi College of Art & Design Financial Aid Office notifies each student, both in person and by email, that they must complete the required Federal Entrance Counseling and provides the appropriate information to do so. Nossi College of Art & Design and Gemcor both retain documentation that the student completed Entrance Counseling and the MPN before disbursing a loan.

### Procedure

If meeting with a student in person or communication by email, Nossi College of Art & Design Financial Aid Advisors will email the Federal Entrance Counseling Guide to each student and will also provide the Nossi College of Art & Design Entrance Counseling instructions.

## Exit Counseling

### Policy:

Exit Counseling is a requirement by the Department of Education that any student that has received federal loans and graduates, drops below half time, withdraws, or does not return must complete Exit Counseling. Federal Exit Counseling provides information to the student to prepare them to repay their federal loan(s). Nossi College of Art & Design Financial Aid Office notifies each student in any of these situations that they must complete Exit Counseling and provides all necessary documentation to meet federal guidelines.

- **Withdrawn Students:** The Director of Academic Operations (official 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 and third-party records

by the Financial Aid.

- Graduates: The Director of Academic Operations notifies the Financial Aid Office of the students scheduled to graduate each semester. The Financial Aid Office sends exit counseling instructions at this time. Changes are made to the student's NSLDS and third-party records by the Financial Aid.

### **Procedure**

Nossi College of Art & Design Financial Aid Advisors will conduct Exit Counseling Sessions in person with graduating students. Graduating students will be asked to bring their laptop. We will provide each student with a copy of their NSLDS Loan History along with the loan servicer contact information. We will go over the information in the Federal Exit Counseling Guide which has already been emailed to the student. We will then have them complete Exit Counseling online and complete the Nossi College of Art & Design Exit Interview sheet.

We will meet in person, when available, with students who drop below half time, withdraw, or do not return and go through an individual exit counseling session. Students should complete Exit Counseling online at [studentaid.gov](http://studentaid.gov). These students, they will be provided with their NSLDS Loan History, the Nossi College of Art & Design Exit Interview Sheet, their Loan Servicer contact information, and we will email the Federal Exit Counseling Guide. In situations where we are unable to meet in person with a student, we will email them on both their Nossi College of Art & Design email and personal email address their NSLDS Loan History, Nossi College of Art & Design Exit Interview Sheet, their Loan Servicer contact information, and the Federal Exit Counseling Guide. The student will be emailed within 30 days of learning that the borrower has withdrawn or failed to complete the semester. Proof that a student was emailed to complete Exit Counseling will be printed and scanned into their record.

All loan records are maintained manually in Nossi College of Art & Design Financial Aid Office and with Gemcor. 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)

Loan Repayment: This is part of the loan counseling (both Entrance and Exit). Financial Aid Advisors emphasize the importance of repaying loans during one-on-one counseling, when speaking to classes etc. Students can use the repayment calculator, FSA Loan Simulator.

<https://studentaid.gov/loan-simulator/>.

## **Nossi College of Art & Design Default Prevention Policy and Procedure**

### **Policy**

Nossi College of Art & Design maintains written policy and procedures for the default prevention/aversion activities performed by Nossi College of Art & Design and those performed

by WISS (Wright International Student Services Default Management Solutions- a third-party servicer).

### **Procedure**

The Nossi College of Art & Design's Default Prevention Policy and Procedure is designed to promote student and school success and reduce student loan defaults in the Federal Loan Program by advising students at initial enrollment and graduation, Entrance and Exit counseling for all borrowers, Financial Literacy, accurately updating of student status' as well as overseeing student's progress, attendance, and retention across campus.

Nossi College of Art & Design partners with Wright International Student Services Default Management Solutions. A chart showing the division of responsibilities is at the end of this procedure.

**WISS- Information Security**– The WISS Policy and Procedure Manual starting on pg. 30 outlines how the information is safeguarded when it is being transmitted between both parties. The only communication between Nossi College of Art & Design and WISS is handled through their secure portal. If a security breach occurs, it must be reported to the Department of Education that same day.

Nossi College of Art & Design- [Information Security Policy and Procedure Policy](#)

### **Advising Students**

During initial admissions/financial aid advising, students must complete the Nossi College of Art & Design Financial Aid Application which gathers current address, phone numbers and personal references. We also go over the Nossi College of Art & Design Statement of Student Responsibilities information sheet and explain the implications of borrowing student loans. The information sheet also talks to them about withdrawing during a semester. If they withdraw during a semester before they have earned all the value of their financial aid, some or all of their federal aid will have to be returned to the government and they would owe the school a balance. They would still be responsible for repaying their loans. All students sign this form and it is retained in their file. We feel this is a first step in default prevention and helping the student understand their responsibilities in accepting a federal student loan.

- **Entrance Counseling**  
Regulations require that first time borrowers of the federal loan program receive entrance counseling. During Entrance Counseling, Nossi College of Art & Design Financial Aid Advisors explains how the master promissory note works and instructs the student to complete the mandatory Entrance Counseling which educates them on how much in loans they are borrowing, budgeting, and loan repayment options. Entrance Counseling also goes over default prevention options such as forbearance and deferment. If possible, we will go over this in person and have the student complete the counseling on studentaid.gov. If the student must do it online, they are sent all appropriate information to complete it online. The federal Entrance Counseling Guide is emailed to all students needing to complete Entrance Counseling whether in person or completing online on their own.

Nossi College of Art & Design makes every attempt to collect as much contact

information about borrowers. We collect personal information and references on the Nossi College of Art & Design Financial Aid Application, the Admissions Application and on the federal Master Promissory Note at time of enrollment to facilitate future contact if needed. These activities are done to ensure a more knowledgeable, responsible borrower, and result in fewer defaults.

- **Exit Counseling**

Exit counseling is an effective way to prevent defaults and is often the last opportunity that borrowers have to work with an advisor regarding their loans. In-depth counseling that focuses on fully explaining repayment plans and choices that fit the borrowers' needs is valuable in laying the groundwork to establishing a successful payment plan with their Loan Servicer. Exit counseling is the opportunity to clear up any misconceptions students may have about their loan obligations and re-emphasize the consequences of default. Nossi College of Art & Design takes full advantage of this opportunity to work with our students. Here is information from our policy and procedure manual thoroughly describing the process.

Nossi College of Art & Design Financial Aid Advisors will conduct Exit Counseling Sessions in person with graduating students. Graduating students will be asked to bring their laptop. We will provide each student with a copy of their NSLDS Loan History along with the loan servicer contact information. We will go over the information in the Federal Exit Counseling Guide which has already been emailed to the student. We will then have them complete Exit Counseling online and complete the Nossi College of Art & Design Exit Interview sheet.

We will meet in person, when available, with students who drop below half time, withdraw, or do not return and go through an individual exit counseling session. Students should complete Exit Counseling online at [studentaid.gov](http://studentaid.gov). These students, they will be provided with their NSLDS Loan History, the Nossi College of Art & Design Exit Interview Sheet, their Loan Servicer contact information, and we will email the Federal Exit Counseling Guide. In situations where we are unable to meet in person with a student, we will email them on both their Nossi College of Art & Design email and personal email address their NSLDS Loan History, Nossi College of Art & Design Exit Interview Sheet, their Loan Servicer contact information, and the Federal Exit Counseling Guide. The student will be emailed within 30 days of learning that the borrower has withdrawn or failed to complete the semester. Proof that a student was emailed to complete Exit Counseling will be printed and scanned into their record.

### **Financial Literacy and Default Management**

Nossi College of Art & Design campus wide continues to educate students throughout their time on financial literacy and default management.

Success Strategies classes for all new start students dedicates a class time per term to Budgeting (Financial Literacy). This is the week that the Financial Aid Office visits each class in person. Examples of Items discussed:

- Implications of withdrawing from school during a semester or not returning
- Importance of making a plan to repay your loans
- Importance of planning and budgeting
- Letting the students know that we want to work with them individually to try to keep their loan debt as low as possible.
- Outside Scholarships

- We utilize the FSA Money Management Checklist and email it to all students annually during the spring semester. When counseling in person, we encourage students to reduce their loan debt if possible and be responsible borrowers. The Financial aid offer email clearly gives the option to decline, accept a reduced amount or accept in full the student loan. We encourage responsible borrowing. A link to the checklist is included in the financial aid offer email: <https://studentaid.gov/sites/default/files/money-management-checklist.pdf>

### **Default Prevention and Retention Staff**

Nossi College of Art & Design has an up-to-date retention plan. Our VP of Academic Affairs and Director of Academic Operations are dedicated to student retention. Nossi College of Art & Design contracts with WISS, a third-party servicer with years of experience for Default Prevention. Default Management at Nossi College of Art & Design is a school wide effort and is not to be the responsibility of only a single office.

### **Communication Across Campus**

Accurate and timely communication among the college entities is designed to comply with regulations regarding the school's standards of administrative capabilities, accurate and timely reporting of borrowers' enrollment status, and satisfactory academic progress.

Communication of information relevant to the prevention and management of defaults at Nossi College of Art & Design is a school-wide effort and is not be the responsibility of only a single office. Every Friday (as available) the Director of Academic Operations along with the VP of Academic Affairs, President & CEO, all Program Directors, Financial Aid Advisor, Admissions Director, meet either in person or on a teleconference call to go over the attendance of at-risk students from the last week. A plan is cultivated to help the student remain enrolled, improve attendance and to pass their classes.

### **Timely and Accurate Enrollment Reporting**

Nossi College of Art & Design's Financial Aid Advisor updates the NSLDS system. All new students are put on the Transfer Monitoring report. NSLDS is updated anytime their enrollment status changes while attending college. If a student withdraws or graduates NSLDS is updated with that information as well. We also are required by federal regulation to complete the NSLDS SSCR Report every 60 days to update every student status listed on the roster.

<b>Responsibilities</b>	<b>School</b>	<b>WISS</b>
<b>Debt Management Plan:</b>		
Review and Analyze Debt Management Plan (Yearly)	X	
Develop Strategies and New Initiatives	X	
<b>Financial Literacy:</b>		
Individual Student Meetings	X	
Entrance Counseling	X	
Exit Counseling	X	
<b>Cohort Default Rate:</b>		
Challenge Draft Rate	X	
Appeal Final Rate	X	
Cohort Default Rate Analysis	X	X
<b>Default Prevention</b>		
45-360 Days Delinquent Borrowers – Contact Borrower		X
Cohort Default Rate Reports		X
Monitor Cohort Default Rate	X	X
New Strategies and Initiatives	X	X
Reference Information	X	X
Request Portfolio Assistance Report from NSLDS	X	

## Identifying and Issuing Credit Balances and Waivers

### Policy

Nossi College of Art & Design follows the Department of Education's policy to issue Title IV Credit Balances within 14 days.

If a student chooses to "hold" some or all of the credit balance for a future semester within the loan period, they will complete and sign the "Treatment of Federal Student Aid Credit Balances and Voluntary Authorization to Retain Funds" (Credit Balance Waiver) form. These funds are held in a subsidiary ledger account designated for that purpose. Cash is maintained in this account at all times equal to the amount of funds the institution holds on behalf of students or parents.

### Procedure

The Business Office posts all federal student loans and grants to the student's ledger within 3 days of the G6 drawdown based on the daily award journal sent from Gemcor. Within 14 days of the start date of the semester the business office runs a student balance report from the student information system and together with the financial aid office compares the student balance report with the Financial Aid roster to ensure all funds are processed correctly. This process will determine if a student has a credit balance from Title IV disbursements. If a student has a credit balance waiver on file for the semester the business office reduces the requested funds from the student's ledger and moves those funds to the appropriate account at the bank. Any Credit Balance Waiver funds are held until the appropriate semester unless the student requests the funds to be redistributed. then posted back onto the student's ledger as requested. If there is no credit balance waiver, then any excess title iv funds are issued to the student or parent in the form of a check. Monitoring for Credit Balances continues throughout the semester. The business office continues to run a student balance report throughout the semester as funds continue to come in and insure that title iv credit balances are processed and distributed within 14 days.

Notification Process: Students are notified by the Business Office on their school email account within 14 days of the start of the semester to inform them that their overage check is available. Parent Plus overages are automatically mailed to the parent unless the parent requests to pick up the check from the campus or they indicated they want the overage to go to the student. The notification email includes pick up instructions for students/parents who are picking up their check on campus.

The business office will mail any unclaimed checks within 21 days after initial notification of availability. For all mailed checks, the business office makes a copy of the envelope with postage and attaches the copy to the appropriate check stub. For students or parents who elect to pick up their check from the campus, the business office requires a signature and date of pick up on the stub. The student/parent takes the check, and the business office retains the stub for our records. If a check is returned to the campus as undeliverable, the business office contacts the student to get an updated address for mailing.

In the event, funds need to be returned to the Department due to an un-negotiated check and/or undeliverable funds, Financial Aid will notify Gemcor and Gemcor will process the refund in COD. The business office will deposit the necessary funds in the Federal Funds

bank account for Gemcor to pull the funds from the Federal Funds account and return the funds to G6 and the Department within the 240 days allotted.

(Policy Effective September 2021) Music City Housing, LLC: Nossi College of Art & Design entered a contract with Music City Housing, LLC to provide housing for our students that wish to use this option. This contract, according to direction from the Department of Education, allows Nossi College of Art & Design to charge the student rent based on available funds payable to Music City Housing, LLC.

(Procedure Effective September 2021) - Music City Housing, LLC: For those students who wish to rent from Music City Housing, LLC, they can complete the form "Federal Title IV Authorization – Authorization to Pay Rent Charges Directly to Music City Housing, LLC from Financial Aid." This authorization will remain in effect for each subsequent pay period unless the student/parent chooses to revoke it. With this form in place, a student/parent authorization allows us to charge MCH rent funds to the student account, and it is included on the financial aid offer as a charge. If a student withdraws, these charges must be included in a Return of Title IV Calculation.

## Reconciliation

### Policy

Nossi College of Art & Design participates in the Direct Loan program and as is required, the business office reconciles funds submitted to COD by Gemcor through the G6 system. Reconciliation is completed monthly and annual audit is completed by a third-party accountant.

### Reconciliation Process

The Semester Financial Aid Roster, the financial aid awards entered in the SIS, and the Gemcor approved funds report are reconciled by the Financial Aid Office prior to funds being disbursed. Any discrepancies are corrected. The Financial Aid Office approves (requests) Title IV aid in Gemcor. Gemcor reviews the approved aid and works with the Financial Aid Office to correct any errors. Gemcor processes originations and disbursements through COD. Gemcor draws down funds from G6 and sends them to the Nossi College of Art & Design federal aid bank account. Gemcor sends a daily award journal to Financial Aid and Business office to show the funds for each student that was included in the deposit from G6. The Business office reconciles the amount posted on the student ledger by comparing it with the amount provided on the daily award journal. Gemcor reconciles the monthly the federal funds bank statement with G6. Nossi College of Art & Design Business Office reconciles monthly the funds sent from G6, the amounts in the federal bank account and the amounts posted to student ledgers and financial aid awards. The internal auditor also reconciles all Nossi College of Art & Design bank accounts monthly.

Gemcor, on behalf of Nossi College of Art & Design, completes reconciliation and reporting to G6, and COD. GEMCOR's policies and procedures regarding reporting and reconciliation of Nossi College of Art & Design's FSA data meet all the Department of Education's expectations relative to reconciliation of Nossi College of Art & Design's records and balancing of those records to the USDE's COD and G6 systems. Gemcor's reporting and reconciliation processes

occur daily regarding Nossi College of Art & Design's FSA disbursement records with COD, and further reconciliation of those disbursement records with daily cash drawdowns through G6. Further, Gemcor's monthly procedures reconcile Nossi College of Art & Design's federal funds account bank statements with Gemcor's general ledger system, as well as reconciling Nossi College of Art & Design's monthly Direct Loan Account Statements from the USDE with Gemcor's monthly Direct Loan fund activity. Any discrepancies are reviewed, and the appropriate adjustments are made to reconcile each account to zero.

In the posting function, the business office receives the Daily Award journal from Gemcor and begins processing funds in the student information system based on the batches listed in the award journal. If there is a discrepancy, the business office contacts financial aid to correct the discrepancy so that it matches the award journal. When processing each batch, the business office prints a batch report from the student information system that provides the students name and amount of funds posted. The business office ensures that the batch report from the student information system matches the award journal. Within three days of received funds, the Nossi College of Art & Design business office reconciles the daily award journals with the batch report from the student information system and the Financial Aid Roster to ensure that the funds expected are posted to the student ledgers in compliance with regulations. The Nossi College of Art & Design Business Office reconciles, on a monthly basis, the daily award journals from Gemcor with Nossi College of Art & Design's Federal Funds bank statements to ensure that the funds received from Gemcor match the funds processed through the Federal Funds account. This reconciliation will also ensure that the funds posted to the Federal funds match the funds transferred to the Nossi College of Art & Design operating account.

Monthly Reconciliation: See above Process for Financial Posting Procedures. Monthly reconciliation is done in the first half of the month for the prior month in cooperation between the Business Office and the Financial Aid Office. Gemcor also reconciles monthly the Direct Loan and the Federal Pell Grant programs. When reconciling the Federal Funds bank statements with the Award journals, the Business Office assigns a letter (A,B,C, etc.) to each funding amount listed on the Federal Funds bank statement. Each letter is also assigned to the corresponding Award Journal. For example, A on the bank statement will also have a corresponding Award Journal that is notated with an A. These letters will show that the funds listed on the Federal Funds Bank Statement and the Daily Award Journal match.

Annual Reconciliation: Gemcor reconciles for Nossi College of Art & Design the Direct Loan and Pell Grant program annually and completes the closeout for the year. They will work with the Financial Aid office to correct any issues. The Internal Auditor also reconciles all accounts annually.

## Return of Title IV Funds - R2T4

### Policy

To request an official withdrawal, all students must contact Director of Academic Operations about their intent to withdraw. The law specifies how Nossi College of Art &

Design must determine the amount of Title IV program assistance that a student earns if the student withdraws from school, either voluntarily or involuntarily. The withdrawal date that is used in determining a student's refund or repayment will be defined as the student's last date of attendance which is recorded in the Nossi College of Art & Design student information system. The requirements for Title IV program funds when a student withdraws are separate from any institutional refund policy. Therefore, the student may still owe funds to the school to cover unpaid institutional charges. The school charges the student for any Title IV program funds that the school was required to return. A copy of the school's institutional refund policy is contained in the Nossi College of Art & Design Catalog.

The U.S. Department of Education requires Nossi College of Art & Design to use the Return of Title IV Funds Policy for students who withdraw from school prior to the end of the semester and who are receiving Federal Title IV funds. 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, Direct Subsidized and Unsubsidized Loans and Parent PLUS 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.

The Return to Title IV Calculation is performed within 14 calendar days (date of determination) of the last date of attendance or the date the student officially requests to withdraw. The Return to Title IV funds is returned back to the government within 45 calendar days.

The R2T4 form calculates the amount of aid earned based on the term start date, number of days in the term (term end date) and last date of attendance. The form calculates the amount of Title IV funds earned by a student based on the percentage of payment period or period of enrollment the student completed.

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. 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 and fees.

The funds are returned in the following order:

1. Unsubsidized Direct Loan
2. Subsidized Direct Loan
3. Parent PLUS Loan if applicable
4. Pell Grant

### **Procedure**

1. The R2T4 process would begin with a student requesting to withdraw or if a student has not been in attendance for 14 consecutive days. Nossi College of Art & Design conducts attendance retention meetings regularly to monitor possible withdrawal issues.
2. The Financial Aid Advisor uses the Nossi College of Art & Design Withdrawal Checklist printing all required documents. If an R2T4 is required, then the advisor would use the printed documentation to process the R2T4 supplied by Gemcor. The R2T4 and all

- supporting documents are scanned and sent to Gemcor for review and approval.
3. The R2T4 is approved returned from Gemcor to the Nossi College of Art & Design Financial Aid Advisor. if funds are required to be returned the financial aid advisor completes the following steps to ensure the funds are sent back within 45 days. The financial aid advisor enters the refunds off the R2T4 into Gemcor and gives the Business Office the detailed report of funds to be removed from the student ledger and returned. The amount of returned funds will be transferred from the operating bank account to the federal funds bank account. Gemcor will then process the refund and draw the necessary funds from the federal bank account to send back to G6. This part of the process happens on the same calendar day.
  4. NSLDS is updated with the student's withdrawal date.
  5. The student is required to complete Exit Counseling. See Exit Counseling Procedure for "in person" and "if student is not present" process.
  6. All documentation is scanned and kept in the student's file.
  7. Requesting a Leave of Absence – The Leave of Absence Policy, Leave of Absence Definition, Leave of Absence Requirements, Leave of Absence Approval Process, Failure to Return Policy, Impact of Leave of Absence on Financial Aid Policy and Procedure can be found in the Nossi College of Art & Design Catalog under Regulations.

## Audits

### Procedure

Nossi College of Art & Design's Certified Independent Auditor conducts an annual compliance audit of the administration of Title IV programs as well as an audit of the schools general purpose financial statements. Audits are conducted by the standards established by the U.S. General Accounting Office's Government Auditing Standards. It includes all Title IV, HEA program transactions that have occurred since the period covered by the institution's last compliance audit. The results of the audit are submitted through EZ Audit and also sent to our accrediting agency.

## IPEDS

The Integrated Postsecondary Education Data System (IPEDS) is a system of interrelated surveys conducted annually by the U.S. National Center for Education Statistics (NCES). IPEDS gathers information from every postsecondary institution that participates in the federal Title IV programs. The Higher Education Act of 1965 requires that institutions that participate in federal student aid programs report data on enrollments, program completions, graduation rates, faculty and staff, finances, institutional prices, and student financial aid. Nossi College of Art & Design's Designated Keyholder for IPEDS does the school reporting and makes sure we meet all deadlines. They work in conjunction with all necessary departments needed to complete the reporting.

## Record Retention

Nossi College of Art & Design keeps all student financial aid files for a minimum of five years beyond the end of their last attended term. In the summer semester, archived files are reviewed and financial aid files that are older than five years past their last academic term are shredded for security purposes.