

**TITLE IV ADMINISTRATION  
POLICIES AND PROCEDURES  
MANUAL**



**CENTRAL  
STATE UNIVERSITY**

## **Introduction**

Welcome to the Title IV Administration Policies and Procedures Manual. This document is designed to serve as a comprehensive guide to the policies and procedures governing the administration of Title IV federal student aid programs at Central State University.

The manual is intended for use by staff and administrators involved in the management, disbursement, and oversight of financial aid at Central State University, ensuring compliance with federal regulations and institutional standards.

## **Purpose of the Manual**

The purpose of this manual is to provide clear and concise instructions for the administration of Title IV programs, which include the following federal student aid programs:

- Federal Pell Grants
- Federal Direct Loans (Subsidized and Unsubsidized)
- Federal Direct PLUS Loans
- Federal Work-Study (FWS)
- Federal Supplemental Educational Opportunity Grants (FSEOG)

This manual outlines the roles, responsibilities, and procedures required to effectively manage these funds in accordance with Title IV of the Higher Education Act of 1965, as amended, and the associated federal regulations (34 CFR Part 668).

## **Scope and Applicability**

This manual applies to all personnel involved in the administration of Title IV student aid, including but not limited to:

- Financial Aid Office staff
- Business Office staff
- Registrars and Admissions personnel
- Compliance and Internal Audit teams
- Institutional leadership involved in decision-making related to financial aid and student services

Additionally, this manual is intended to guide both day-to-day operations as well as more complex scenarios, such as audits, investigations, and the handling of financial aid appeals.

## **Overview of Title IV Programs**

Title IV programs are designed to assist eligible students in meeting the costs of their higher education. The federal government provides financial support through grants, loans, and work-study programs to help ensure that a postsecondary education remains accessible to

students regardless of their financial background. The Title IV programs are administered by the U.S. Department of Education, and institutions must adhere to stringent eligibility and compliance requirements to participate.

This manual covers the following key areas:

1. Eligibility Requirements for Title IV programs, including student eligibility, institutional participation, and program-specific criteria.
2. Application Process for financial aid, including FAFSA submission, student verification, and award determination.
3. Disbursement and Packaging procedures for awarding Title IV funds and ensuring timely and accurate disbursement to eligible students.
4. Return of Title IV Funds (R2T4) rules and regulations in cases of student withdrawal or program interruption.
5. Reporting and Recordkeeping obligations, including the timely submission of required reports to the Department of Education and maintenance of accurate records.
6. Compliance and Auditing standards to ensure adherence to federal regulations and the institution's own policies, including handling audits, program reviews, and internal controls.
7. Communication and Student Support to ensure that students are informed about their rights and responsibilities regarding Title IV aid.

#### **Goal of This Manual**

The goal of this manual is to support the efficient, accurate, and compliant administration of Title IV programs, thereby contributing to the success of our students and the institution's overall mission. By following the procedures outlined in this document, [Institution Name] will ensure compliance with federal requirements, minimize financial aid errors, and enhance the quality of services provided to students.

#### **Manual Updates and Revisions**

Federal regulations and institutional procedures may change over time, and it is important that this manual be regularly reviewed and updated. Staff members are encouraged to remain informed about updates to this manual, as well as changes to federal and state regulations related to Title IV administration. All revisions to this manual will be communicated through official channels, including email notices, staff meetings, and training sessions.

#### **Contact Information**

For questions or further clarification regarding the policies and procedures outlined in this manual, please contact the Financial Aid Office at:

- Phone: (937) 376-6008 or Email: [financialaid@centralstate.edu](mailto:financialaid@centralstate.edu)

### **Importance of Strict Adherence**

**Strict adherence to the policies and procedures outlined in this manual is required to maintain compliance with federal regulations and ensure that Title IV funds are administered accurately and responsibly. Non-compliance may result in penalties, including the loss of eligibility to participate in federal student aid programs, financial liabilities, and potential audits by the U.S. Department of Education.**

**The procedures in this manual are designed to protect both students and the institution, ensuring that students receive the correct amount of aid based on accurate information and that federal funds are used in accordance with the law.**

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

**Thank you for your attention to these important guidelines and for your commitment to maintaining the integrity of our financial aid program.**

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**Attendance and Enrollment Policy – Confirming Attendance Prior to Disbursement  
Central State University  
Wilberforce, OH**

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Area of Responsibility:	Office of Financial Aid
Responsible Contact:	Director of Financial Aid
Policy Identification:	Attendance and Enrollment Confirmation Policy – Confirming Attendance Prior to Disbursement
Effective: Date (Last Approved):	For Review

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## Background and Purpose

The regulatory requirement for institutions to confirm that a student has begun attendance before disbursing federal financial aid is outlined in 34 CFR 668.21. This regulation mandates that if a student does not begin attendance in a payment period or period of enrollment, the institution must return all Title IV funds disbursed for that period. Therefore, institutions must verify a student's attendance before disbursing federal financial aid to ensure compliance with this regulation.

## Scope

This policy applies to all Title IV recipients.

## Policy Statement

Central State University will not disburse Federal Financial Aid funds to a student's account until it has been confirmed that the student has begun attendance in the courses for which they are enrolled during the applicable payment period.

## Procedures

### Attendance Verification Process

- **Instructor Reporting**
  - Instructors are required to record and report student attendance during the term.
  - Attendance must be submitted on the 6<sup>th</sup> and 10<sup>th</sup> day in Banner by all instructors. Then, instructors indicate non-attendance at the first and second interim grade reporting period and the final grade report with a grade of FZ and the last date of attendance.

### **Institutional Designation – Non-Attendance Taking**

Because Instructors record and report student attendance for a limited period (6<sup>th</sup> and 10<sup>th</sup> day of each term), Central State University is considered a “non-attendance taking” institution. Subsequent grades and information reported by Instructors is used to determine the withdrawal date for any student identified as no longer attending.

□ **Data Collection**

- The Registrar's Office will collect or verify attendance data from instructors promptly after the reporting deadline stated above (6<sup>th</sup> and 10<sup>th</sup> day of term).
- The Registrar's Office runs a report on instructors who do not submit information by the deadline. This report is distributed to deans and department chairs who inform instructors that they must submit any missing information within 48 hours.
- Attendance records will be compiled and maintained in the student information system and/or Registrar's Office.

### **Attendance Verification for Financial Aid Disbursement**

1. Financial aid funds will not be disbursed until student attendance is verified based on the institution's Add Drop and/or Census Date.
2. The Registrar's Office will compile enrollment records after the Add Drop and/or Census Date to confirm attendance in at least one eligible course.
3. The Financial Aid Office will use these records to determine student eligibility for disbursement of Title IV funds.
4. If a student is not recorded as attending any course by the Add Drop and/or Census Date, their financial aid disbursement will be withheld.
5. Students who fail to establish attendance by the deadline will have their financial aid canceled accordingly.
6. Under the Title IV reporting requirements, "attend a course" refers to academically related activities that include, but are not limited to, the following:
  1. physically attending a class where there is an opportunity for direct interaction between the instructor and students.
  2. submitting an academic assignment; taking an exam, completing an interactive tutorial, or participating in computer-assisted instruction.
  3. attending a study group that is assigned by the school.
  4. participating in an online course discussion about academic matters; and
  5. initiating contact with a faculty member to ask a question about the academic subject studied in the course.

The Financial Aid Office adherence to this policy and process will support ongoing compliance with this Federal regulation.

**POLICY: Satisfactory Academic Progress (Title IV SAP)**  
**Central State University, Wilberforce, Ohio**

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<b>Area of Responsibility:</b>	Office of Financial Aid
<b>Responsible Contact:</b>	Director of Financial Aid
<b>Policy Identification:</b>	Satisfactory Academic Progress (Title IV SAP)
<b>Effective: Date (Last Approved):</b>	For Review

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## Background and Purpose

The Higher Education Act requires recipients of Title IV funds to maintain Satisfactory Academic Progress as they move forward in earning a degree. The United States Department of Education (USDOE) requires that institutions have a reasonable policy for monitoring that progress. The USDOE considers a satisfactory academic progress policy to be reasonable if it meets both the qualitative and quantitative criteria, which will be explained later. Central State University has established the following policy Title IV SAP policy.

## Scope

The Title IV SAP policy applies to all students/recipients (undergrad, grad, etc.) and includes an assessment of all payment periods, regardless of whether the student received financial aid during a specific payment period.

The USDOE also requires that the SAP policy for Title IV students be *at least as* strict as the SAP policy for students enrolled in the same program of study who are not receiving Title IV funds. The SAP policy for Title IV recipients can also be *stricter* than the policy for non-recipients enrolled in the same program. The Title IV SAP policy applies equally to all students within categories, e.g., full-time, part-time, on-ground, online, etc. This Title IV SAP policy is stricter than the policy on Academic Standing for students who are not Title IV recipients. An evaluation is conducted annually to determine if the student meets the criteria.

## SAP Evaluation

### Frequency

The Institution requires that an academic progress evaluation be conducted at the end of each payment period for students in programs lasting one year or less. For all other programs, an SAP evaluation is conducted annually, at the end of the Spring term. Because SAP must be evaluated for every term during which the student was enrolled for the period, an additional cumulative (Fall/Spring/Summer) evaluation is required if any Title IV recipient also attends the summer term that immediately follows Spring. Students who fail to meet the standard will receive communication via email that includes options for regaining eligibility (discussed later in this policy).

### Quantitative (PACE) - Undergraduate and Graduate

To maintain financial aid eligibility, all students must complete at least 67% of the total credit hours attempted **cumulatively**. Courses that are accepted as transfer credits are counted as attempted and earned when calculating PACE. The calculation is as follows:



Cumulative number of credits a student successfully completed.  
Cumulative number of credit hours a student attempted.

### Qualitative (GPA) – Undergraduate\*

To maintain financial aid eligibility, UG students are required to maintain a cumulative 2.0 GPA.

### Qualitative (GPA) – Graduate\*

In order to maintain financial aid eligibility, GRAD students are required to maintain a cumulative 3.0 GPA.

\*For program lengths of two or more years, students are required to achieve a minimum “C” average or equivalent at the end of the 2<sup>nd</sup> year to maintain Title IV eligibility.

### Rounding Rules

Central State University uses the standard rounding rules on any SAP measurements for both qualitative and quantitative components (i.e., round up .5 and higher, round down if below .5). A student is either making SAP for all Title IV programs or is not. You cannot say a student is making SAP for Pell but not for Direct Loans.

### Maximum Allowable Time (150%)

Students shall remain eligible for financial aid if they complete their program before attempting 150% of the total number of credits required for the program. The college uses credit hours to determine Maximum Timeframe. For example, a student pursuing an undergraduate degree at Central State University (which requires at least 120 credit hours for completion) may attempt a maximum of 180 credit hours or 150% of the length of the program during his /her tenure at the University. (150% X 120= 180). Similarly, a student pursuing a graduate degree may attempt a maximum of 150% of the credit hours required to complete the program. Transfer credit officially accepted as coursework for the program in which the student is enrolled shall be included in this calculation.

Failure to meet either Quantitative (PACE) and/or Qualitative (Cumulative GPA) will result in the student being non-compliant with the SAP Policy. If a student is suspended or expelled from the University, for any reason, the student will not be eligible for Federal aid until the minimum SAP standards are met.

## Satisfactory Academic Progress Status Definitions

### Good Standing

A status assigned to a student that has met both quantitative and qualitative standards for SAP at the end of the evaluation period (annually, or by term if on Financial Aid Probation)

### Financial Aid Suspension

Failure to meet either Quantitative (PACE/Maximum Timeframe) and/or Qualitative (Cumulative GPA) will result in the student being non-compliant with the SAP Policy. In those cases, students may be placed on Title IV SAP Suspension. Students may appeal Suspension and if approved, be placed on Probation. Removal from financial aid does not prevent students from enrolling at the university

without financial aid if, based on their academic standing with the university, they are otherwise eligible to continue their enrollment and pay. However, in the event that a student is suspended or dismissed from the university for poor academic performance, his/her eligibility for financial aid is suspended until he/she is eligible to enroll again at the college and meets the minimum SAP standards.

### Financial Aid Appeal Process

Students who have their federal financial aid eligibility suspended for failure to make SAP may submit a formal appeal. To appeal, a student must file a written request regarding their financial aid suspension status within 10 days of receiving written notification. All appeals should be submitted in writing with supporting documentation to the attention of **Office of Financial Aid, Central State University, 1400 Brush Row Road, Wilberforce, Ohio 45384.**

In some instances, an interview may be scheduled for the student to address any questions concerning the appeal request. The appeal request will be addressed by the Office of Financial Aid and all decisions are final.

#### The financial aid appeal letter should:

- Include the student's name, address, phone number, and student ID number.
- Include the appropriate documentation relating to the situation that caused the student not to meet the SAP guidelines (injury or illness, death of family member, or other special circumstances)
- Clearly state why the student was not able to make SAP.
- State what has changed in the student's situation that will allow the student to demonstrate his/her ability to meet SAP in the next payment period.
- Detail what the student will do differently academically if they are granted an appeal to continue.

If the appeal is **approved, the student will be placed on Financial Aid Probation.** Incomplete appeals will not be considered. Each appeal will be considered on its own merit. The student will be informed in writing as to the status of the appeal. Appeal decisions are considered final and uncontestable.

### Financial Aid Probation

Only students whose appeals have been granted will be placed on Financial Aid Probation. Financial Aid Probation **is for the next enrolled payment period only unless it is determined by the academic plan that the student may need a longer probation period.** At the end of the next payment period, all enrolled students on probation will have their academic record reviewed to determine if they have met the requirements for SAP and/ or the requirements of their academic plan. The academic plan will then become part of the student's financial aid file and classroom plan of study. Students who make progress after being on Financial Aid Probation for a semester are moved to a "good standing" status. Students that do not maintain the required standards will be placed back on Financial Aid Suspension.

### Re-Establishing Satisfactory Academic Progress

Students must meet the guidelines established for SAP as stated above in order to regain eligibility to receive Federal Financial Aid. Students denied their appeal must meet these requirements at their own expense. Eligibility cannot be reestablished simply by being out of school for a set period or by paying for a certain number of courses with one's own funds.

## Grades and Other Impacts on SAP

### Course Withdrawals

These grades will be included as credits attempted, but not earned and will have an adverse effect on the student's ability to maintain satisfactory academic progress.

### Incomplete Grades

Incomplete grades are processed in the SAP calculation as attempted credits, not yet earned and may affect eligibility.

### Repeated Courses

Repeated coursework will be counted as attempted hours each time the course is taken, and the student receives financial aid for that course. Financial aid recipients may repeat a failed course as many times as necessary to pass the course, but each course repeat will count as an attempted course in the quantitative calculation for SAP. A financial aid recipient may repeat a passed course only once and receive financial aid for that repeated course.

### Change Of Major

A student may change from one major to another during attendance at the University. Students who change from one major to another are still expected to maintain Satisfactory Academic Progress and complete the course work within the time frame or hour limitation stated unless an appeal is approved. Students who change majors frequently may be referred to the Dean's office for academic counseling.

### Consortium/Contractual Coursework

Courses taken under a written agreement will be considered in both qualitative (GPA) and quantitative (PACE/Max Timeframe) components of SAP.

### Transfer Coursework

Transfer students will be evaluated on the number of semester hours transferred in as both attempted and earned, **plus** the hours and the GPA earned while in attendance at Central State University.

### Completion Of Degree Requirements

For coursework offered in modules, students may complete degree requirements early in a module that ends prior to the end of the payment period/semester. In this case, quantitative and qualitative measures, and final graduation approval, will not be determined until end of semester SAP processing. The student is considered enrolled until the end of the payment period/semester for that final period of study.

Additional information can be found by visiting the university's Financial Aid Office.

**POLICY: Withdrawal and Return of Title IV Funds (R2T4)**  
**Central State University, Wilberforce, Ohio**

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Area of Responsibility:	Office of Financial Aid
Responsible Contact:	Director of Financial Aid
Policy Identification:	Withdrawal and Return of Title IV Funds

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## Background and Purpose

The Federal Higher Education Act (HEA) of 1965 was amended in 1998, and new regulations were established regarding Title IV student financial aid programs. An overpayment occurs when the student receives more aid than he or she was eligible to receive. This can occur when a student withdraws.

Students who leave the Central State University prior to the end of the semester should follow the University guidelines for withdrawing from the University. An Official Withdrawal Form must be obtained from the Office of the Registrar or on the university's website. The Withdrawal Form must be completed by the respective offices listed on the form and returned to the Office of the Registrar for the student to be considered **officially withdrawn**. The withdrawal date is the date the student began the Official Withdrawal process or otherwise provided official notification of withdrawal to the institution. Students who stop attending all their classes but fail to complete the withdrawal process are considered **unofficially withdrawn**. The withdrawal date is the midpoint of the payment period or the last date of attendance or academic activity. The U.S. Department of Education has established guidelines for institutions to follow for students who withdraw (officially or unofficially). The Office of the Registrar updates all offices and reports enrollment and withdrawal information to the National Student Loan Data System, via the National Student Clearinghouse. The policy listed below applies to students who officially and unofficially withdraw from the University.

## Scope

The Department of Education requires that the Return to Title IV (R2T4) policy address how Title IV funds are handled when a recipient of those funds ceases to be enrolled (100% withdrawal) prior to the end of a payment period or period of enrollment. These requirements do not apply to a student who does not actually begin attendance or reduces enrollment hours at the school. For example, when a student reduces his or her course load from 12 credits to 9 credits, the reduction represents a change in enrollment status, not a withdrawal. Therefore, no Return of Title IV Funds (R2T4) calculation is required.

Title IV funds are awarded to a student under the assumption that the student will attend school for the entire period for which the assistance is awarded. When a student withdraws, the student may no longer be eligible for the full amount of Title IV funds that the student was originally scheduled to receive. Up through the 60% point in each payment period or period of enrollment, a pro rata schedule is used to determine the amount of Title IV funds the student has earned at the time of withdrawal. After the 60% point in the payment period or period of enrollment, a student has earned 100% of the Title IV funds the student received and was scheduled to receive during the period.

If a recipient of Title IV grant or loan funds withdraws from the college after beginning attendance, the Financial Aid office performs an R2T4 calculation to determine the amount of Title IV aid earned by the student. If the amount disbursed to the student is greater than the amount the student earned, the unearned funds must be returned. If the amount disbursed to the student is less than the amount the student earned, and for which the student is otherwise eligible, he or she is eligible to receive a Post-Withdrawal Disbursement (PWD) of the earned aid that was not received.

Because a student begins earning Title IV funds on the first day of attendance, even if the student withdraws before the school's census date, the school must perform an R2T4 calculation using the number of days the student attended class. The school must include in the R2T4 calculation all forms of Title IV aid that were disbursed or that could have been disbursed, even if the student receives a full tuition refund.

## When A Student Is Considered to Have Withdrawn for R2T4 Purposes

A student is considered to have withdrawn from a term/semester/payment period if the student does not meet one of the withdrawal exemptions and one of the following occurs:

- Does not complete all the days in the payment period or period of enrollment that were scheduled to be completed.
- ceases attendance and is not scheduled to begin another course within a payment period or period of enrollment for more than 45 calendar days after the end of the module the student ceased attending.
- unable to resume attendance within a payment period or period of enrollment for more than 60 days after ceasing attendance. This applies to programs offered without terms where applicable. The college does not have an approved Leave of Absence policy.

Students who have completed the official withdrawal process will be identified through a report created by the Registrar (Via a system generated report) and the R2T4 will be executed by the Financial Aid team. Students who do not complete the official withdrawal process (unofficial withdrawals) will be identified in a different system generated report produced by the IT office and the Registrar. Instructors submit attendance on the 6<sup>th</sup> calendar day and the 10<sup>th</sup> calendar day of the term. After that, if a student stops attending, instructors submit the last date of attendance at the first interim, second interim, or final grade period in the attendance file in Banner. The grade is entered as FZ along with the last date of attendance is entered.

### R2T4 Withdrawal Exemptions

Starting on September 2, 2020, the USDOE established withdrawal exemption criteria which allows a student who ceased enrollment to **NOT** be considered a withdrawn student for Title IV purposes, which means that **NO** R2T4 calculation is required for that student. Before the institution conducts an R2T4 calculation for a student who has ceased enrollment, the institution will review the student's circumstances to see if the student qualifies for any of the R2T4 withdrawal exemptions.

The withdrawal exemption categories are as follows:

## 1. Withdrawal exemption for graduates/completers

- completing all the requirements for graduation before completing the days or hours in the period that was scheduled to be completed is not considered a withdrawn student (this exemption applies to all types of programs (including those with or without modules)

## 2. Withdrawal exemptions for programs offered in modules

- successfully completing one module that includes 49 percent or more of the number of days in the payment period, excluding scheduled breaks of five or more consecutive days and all days between modules
- successfully completing a combination of modules that when combined contain 49 percent or more of the number of days in the payment period, excluding scheduled breaks of five or more consecutive days and all days between modules
- successfully completing coursework equal to or greater than the coursework required for the institution's definition of a half-time student under 34 CFR 668.2(b) for the payment period

***NOTE: All the withdrawal exemptions apply to both undergraduate and graduate students if the student and program meet the underlying exemption criteria (i.e., the program is offered in modules, the students are completers, etc.). Finally, a student only needs to meet one of the withdrawal exemptions to be exempt from R2T4.***

## General Title IV Principles with Special Applicability in The Return of Title IV Aid

### Definition of a Title IV recipient\*

A recipient of a grant or a loan is a student who has received Title IV funds or has met the conditions that entitled the student to a late disbursement. The R2T4 requirements apply only to the receipt of or qualification for aid that can be included in the calculation.

***\*Note: If the student never actually attended during the payment period or period of enrollment, this does not apply. Likewise, if a student attended but was not and could not have been disbursed Title IV grant or loan funds prior to withdrawal, the student is not considered to have been a Title IV recipient.***

### Verification

The institution requires that all documents required for verification be submitted no later than 120 days after the student's last day of attendance or by the deadline established each year by the Department of Education (typically mid-September), whichever is earlier. The institution will make any applicable post-withdrawal disbursement of the student's Pell Grant. This information is included in the consumer

materials provided to students.

Central State University adheres to the following rules when completing an R2T4 calculation for a student subject to verification:

- The institution will offer any post-withdrawal disbursement of loan funds within 30 days of the date the school determined the student withdrew.
- The institution will return any unearned Title IV funds it is responsible for returning within 45 days of the date the school determined the student withdrew.
- The institution will do a new R2T4 calculation once verification is complete and offer any funds as soon as possible if unable to meet the 30-day deadline because verification is not complete.
- The institution will provide the student or parent the minimum 14-day response time to decide if they are accepting a post-withdrawal disbursement of Direct Loan funds
- The institution will disburse any Title IV grant funds a student is due as part of a post-withdrawal disbursement within 45 days of the date the school determined the student withdrew and disburse any loan funds a student accepts within 180 days of the date the school determined the student withdrew.
- The institution will only include Aid disbursed or Aid that could have been disbursed in the R2T4 calculation those Title IV funds not subject to verification if a student subject to verification has not provided all required verification documents in time for the school to meet the R2T4 deadlines.
- The institution will perform a new R2T4 calculation based on all the aid the student qualified for based on the completed verification documents and will make the appropriate adjustments for students who fail to provide all required verification documents in time for the institution to meet the R2T4 deadline but later provides those documents prior to the applicable verification deadline

#### When a student is selected after receiving a disbursement

If a student is selected for verification after withdrawing, the institution will apply the following rules:

- The institution will not complete verification if the student does not intend to reenroll for the award year and no further disbursements will be made and will not return eligible funds disbursed before the student withdrew.
- If the institution does not complete verification prior to the R2T4 deadline, it will perform the calculation based on the Title IV aid not subject to verification that was disbursed and could have been disbursed when the student withdrew and must return whatever the results indicate.
- If the institution completes verification, it will recalculate the student's aid eligibility based on the verified ISIR/EFC and take the following actions as applicable.
  1. If the recalculation results in a reduction of aid eligibility, the student is responsible for resolving any overpayment of Title IV grant funds. The institution will follow the rules that apply to overpayments that are a student's responsibility.

2. The institution will do a new R2T4 calculation including in Step 1 all Title IV aid for which the student is eligible based on the verified ISIR/EFC.
  - If verification results in eligibility for additional Pell Grant funds, The institution will include the additional amount as aid that could have been disbursed.

***Note: that if the school did not originate any more Direct Loan funds or award any more FSEOG funds before the student stopped attending, The institution will not include such funds as aid that could have been disbursed.***

- If verification results in a reduction of a student's eligibility for Title IV funds, the institution will only include the reduced amounts as aid disbursed or aid that could have been disbursed in the revised R2T4 calculation.
3. Return or make a post-withdrawal disbursement of Title IV funds as required by the new R2T4 calculation.
    - If a school is required to return more funds than it did under the previous R2T4 calculation, The institution will return the additional amounts and make the appropriate adjustments to what it reported to NSLDS, entered in COD, and/or referred to a Default Resolution Group.
    - If the school is required to make a post-withdrawal disbursement, the institution will follow the rules regarding post-withdrawal disbursements.

***Note: If the student fails to complete verification in the time allowed by the school, the results of the previous R2T4 calculation stand.***

If the student is still in attendance when selected, the institution will verify his or her application before making further disbursements. In addition, if verification does not justify all the aid already disbursed, the student must return any Title IV Grant aid for which he or she is not eligible. The student may keep any Direct Loan funds received and FWS wages earned.

### When verification is completed before the R2T4 deadlines

The institution will offer any post-withdrawal disbursement of loan 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 disbursement of grant funds within 45 days of that date. If a student provides all documents required for verification after withdrawing but before the verification submission deadline, and in time for the institution to meet the 30-day R2T4 deadline, the institution performs the R2T4 calculation including all Title IV aid for which the student has established eligibility because of verification and for which the conditions of a late disbursement had been met prior to the student's loss of eligibility due to withdrawal. (34 CFR 668.164(j)(2).)



### When verification is completed after the R2T4 deadlines

The institution will perform a new R2T4 calculation considering all Title IV aid for which the student has established eligibility based upon verification and for which the conditions of a late disbursement have been met prior to the student's loss of eligibility due to withdrawal as aid that could have been disbursed, if before the verification deadline but after the institution has completed the R2T4 calculation, a student provides all the documentation required for verification. If, because of verification, the student's eligibility for Federal Pell Grant, Iraq and Afghanistan Service Grant, Federal Supplemental Educational Opportunity Grant (FSEOG), and TEACH Grant funds has been reduced, only the reduced amount is included in the new R2T4 calculation.

### When verification is not completed

If a student who has withdrawn does not provide the required documents in time for the institution to complete the verification process and meet the previously noted R2T4 deadlines, the institution will only include the Title IV aid that was not subject to the verification process in the R2T4 calculation. If a student who fails to provide all required verification documents, the only Title IV aid that may be included in an R2T4 calculation are Direct PLUS Loan funds, Direct Unsubsidized Loan funds and TEACH Grant funds (verification is not required for receipt of these funds) for which the conditions of a late disbursement were met prior to the student's loss of eligibility due to withdrawal.

A student who fails to provide the required documentation in time for the institution to complete verification and meet the R2T4 deadlines is responsible for returning any Title IV grant funds subject to verification that was already disbursed prior to being selected for verification.

If the institution made an interim disbursement to a student who fails to provide all the documents required for verification in time for the school to meet applicable R2T4 deadlines, the student has failed to establish eligibility for the Title IV funds affected by verification. With interim disbursements, the institution will return Title IV funds and not include any of those funds as aid that was or could have been disbursed in the R2T4 calculation.

## **Principles With Unique Applications in the Return of Title IV Aid**

### Date of determination at institutions that are *not required to take attendance*

For official withdrawals, the withdrawal date is the earlier of the date the student began the official withdrawal process or otherwise provided official notification of withdrawal to the institution. The withdrawal date for a student who does not provide notification (Unofficial withdrawal) is the midpoint (the 50% point) of the payment period or period of enrollment, unless the school chooses to use a last date of attendance at an academically related activity.

The Financial Aid office will use the student's withdrawal date, as determined by the Registrar, to calculate whether Title IV funds must be returned. "Academic attendance" and attendance at an "Academically related activity" are defined as:

Academic Engagement: Active participation by a student in an instructional activity related to the student's course of study.

1. Attending a synchronous class, lecture, recitation, or field or laboratory activity,

- physically, or online, where there is an opportunity for interaction between instructor and student.
2. Submitting an academic assignment.
  3. Taking an assessment or exam.
  4. Participation in an interactive tutorial, webinar or other computer-assisted instruction.
  5. Participation in a study group, group project, or online discussion that is assigned by the institution.
  6. Interacting with an instructor about academic matters (academic engagement)

### Importance of date of determination

The Date of Determination and Last Date of attendance are determined by the Office of the Registrar.

- The Financial Aid office will offer any amount of a post-withdrawal disbursement that is not credited to the student's account. The student response for Direct loan funds is due within 30 days.
- If the student or parent submits a timely response that instructs the institution to make all or a portion of a Direct Loan post-withdrawal disbursement, The institution will disburse the funds within 180 days of the date of determination.
- Title IV grant post-withdrawal disbursements must be made within 45 days if required to be provided directly to the student and within 180 days if paying for allowable charges on the student's account.
- The institution will document a student's withdrawal date and maintain the documentation as of the date of determination.
- Within 30 days of the date of determination, the institution will notify a student if a grant overpayment is due.
- When collecting an overpayment CSU requires repayment of the full amount of the overpayment within two years of the date of determination.
- The institution will return the amount of Title IV funds for which it is responsible no later than 45 days after the date of determination.

### Use of payment period or period of enrollment

The institution will indicate whether the calculation is being done based on a payment period or based on a period of enrollment. For students who withdraw from semester programs, the college performs the R2T4 calculation on a payment period. The institution will use the same basis (payment period or period of enrollment) in its calculations for all students within a program who cease attendance.

### Rounding

Final repayment amounts that the school and student are each responsible for returning or any post-withdrawal disbursements may be rounded to the nearest dollar, except that disbursements may not be rounded up if such rounding would cause the amount disbursed to exceed the student's annual or aggregate award limits, including Pell Grant lifetime eligibility.

Percentages are calculated to four decimal places and rounded to three decimal places. The third

decimal place is rounded up if the fourth decimal place is five or above. For example, .4486 would be rounded to .449, or 44.9%.

The one exception to the rounding rule occurs in determining the percentage of Title IV program assistance earned. Students who withdraw at any point after the 60% point in the payment period or period of enrollment have earned 100% of their Title IV funds. If the standard rounding rules were used in this situation, a quotient of .6001 through .6004, which is greater than 60%, would be rounded down to .600 (60%), and the student would not have earned 100% of his or her Title IV aid. To recognize that students completing more than 60% of the period (by any amount) earn 100% of their Title IV aid, amounts of .6001 through .6004 are not rounded for the purpose of determining whether a student has earned 100% of the Title IV funds for the term.

## Institutional Charges

Institutional charges are used to determine the portion of unearned Title IV aid that the school is responsible for returning. The institution includes all appropriate fees, as well as applicable charges for books, supplies, materials, and equipment when calculating R2T4. CSU's Business Office is responsible for the timely return of funds to the Department of Education.

## Funds to Include in a R2T4 Calculation

The calculation of earned Title IV funds includes the following Title IV grant and loan funds if they were disbursed or could have been disbursed to a student for the payment period or period of enrollment for which the calculation is being performed.

- Pell Grant
- Iraq and Afghanistan Service Grant
- TEACH Grant
- FSEOG
- Direct Loans

## Steps in the R2T4 Process

**Step 1:** Determine whether the student is considered to have withdrawn from the payment period or period of enrollment.

**Step 2:** Determine if the student is eligible for an R2T4 exemption.

**Step 3:** Determine the student's withdrawal date.

**Step 4:** Determine the percentage of earned aid.

**Step 5:** Determine the amount of earned aid.

**Step 6:** Determine the amount of unearned aid.

**Step 7:** Determine the school and student shares of unearned aid.

**Step 8:** Allocate unearned aid to an appropriate aid program.

**Step 9:** Offer post-withdrawal disbursements (if any)

**Step 10:** Make necessary systems updates (internal/external)

**Step 11:** Notify other college offices as necessary.

If disbursed aid exceeds earned aid:

1. Determine the amount of unearned aid by subtracting earned aid from disbursed aid.
2. Distribute the responsibility for returning unearned aid between the school and the student.
3. If unearned funds must be returned, allocate unearned aid to programs from which the student was funded.
4. Return the institution's share and any funds repaid by the student or refer the overpayment to ED within the required time frame.

If earned aid exceeds disbursed aid:

1. Determine the amount of a PWD by subtracting disbursed aid from earned aid.
2. If a PWD is due, determine the sources from which it will be funded and credit any grant portion towards allowable and/or authorized unpaid charges.
3. Offer and obtain the student's, or parents in the case of a parent PLUS, authorization to credit the loan portion of the PWD towards allowable and/or unpaid charges.
4. Directly disburse to the student any amount of a PWD of grant funds which is not credited toward allowable and/or authorized unpaid charges.
5. Offer the student, or parent PLUS borrower, any portion of the PWD disbursement of loan funds not credited towards unpaid charges and make the PWD if the offer is accepted.

## Consumer Information

Central State University will provide the following information to students when aware that the student is considering withdrawal:

- sufficient information for a student or prospective student to determine the procedures for withdrawing and the financial consequences of doing so.
- an estimate of how much Title IV aid the student will retain and how much aid may need to be returned upon withdrawing.
- information on both the school's refund policy and the R2T4 requirements and the interaction between the two
- Information explaining how the school might adjust a student's charges to consider any return of funds the school might be required to make.
- Information that explains whether he or she withdraws institutional charges that were previously paid by Title IV funds might become a debt that the student would be responsible for paying.
- identify the office(s) that the institution has designated to accept notification of official withdrawals.

## Applicable Deadlines

Two main deadlines that impact most R2T4 calculations are: the 45-day time frame for the Return of Title IV Funds and the 30-day required notification of the need for authorization to make a post withdrawal disbursement of Direct Loan funds.

Any action taken after a deadline, even a correction, is a violation of that deadline requirement. So, when the institution corrects an R2T4 calculation and, as a result, returns funds after the 45-day deadline, it is a late return. Likewise, if a school makes a correction and fails to notify a student or parent that they are eligible for a post-withdrawal disbursement within 30 days of the date of the institution's determination that the student withdrew, the school has violated that deadline.

## Return of Title IV Funds by the School

The institution will 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:

1. Unsubsidized Direct Loans (other than Direct PLUS Loans)
2. Subsidized Direct Loans
3. Direct PLUS Loans (parent or graduate)
4. Federal Pell Grants for which a return of Title IV funds is required.
5. Iraq and Afghanistan Service Grant, for which a return of Title IV funds is required.
6. FSEOG for which a return of Title IV funds is required.
7. TEACH Grants for which a return of Title IV funds is required.

***NOTE: Under the September 2, 2020, final regulations, the order of return of Title IV funds was slightly modified with respect to Iraq and Afghanistan Service Grants.***

The institution will return unearned funds as soon as possible but no later than 45 days after the date of determination of a student's withdrawal by:

- depositing or transferring the funds into the school's federal funds bank account
- initiating the return of funds to the Department electronically using the "Refund" function in G6
- issuing a check to the USDOE

## Responsibilities in the Return of Title IV Funds by the Student

If a student owes a repayment to the Pell Grant Program, the Financial Aid office will notify the student by certified mail within 30 days that he/she must repay the overpayment. Overpayments are any amount of unearned Title IV funds that must be returned by the student to the Department of Education. The Financial Aid office will report to the Department of Education the amount of Title IV grant fund overpayment when it exceeds \$50. The student must return funds to the Title IV fund from which they were received. The student must return the net amount disbursed from each funding source. A student is required to repay 50 percent of the grant assistance he or she received. The student (or parent, if a federal PLUS loan) returns funds to the loan programs in accordance with the terms of the loan and to grant programs as an overpayment. In other words, the student will be repaying any unearned loan funds in the same manner that he or she will be repaying earned loan funds.

The Financial Aid office will send notification to the student in writing within 30 days of the date of the determination that the student withdrew, and a grant overpayment is due. In the notification the following repayment options are available:

1. Pay in full within 45 days.
2. Establish repayment arrangements with the institution.
3. Establish repayment arrangements with the Department of Education

If the student defaults in the repayment agreement, the institution will report within 30 days to the Department of Education and National Student Loan Data System (NSLDS) that the student is in overpayment status.

***NOTE: The student automatically retains eligibility for Title IV assistance for 45 days after the institution sends the notification of a grant overpayment and request for repayment arrangements to the student.***

## Credit Balance

When the calculation results in a credit balance as a result of a post-withdrawal disbursement, a refund will be issued to the student within 14 days of the calculation or confirmation from the student if the post-withdrawal includes a Direct Loan payment.

## Correcting a Return Calculation

Any corrective action taken after the time frame, even a correction, is a violation of that deadline requirement. Therefore, if the College corrects a Return of Title IV Funds calculation and, as a result, returns funds after the 45-day deadline, it is a late return.

In addition, if a correction is made and the College fails to notify a student or parent that they are eligible for a Post-Withdrawal Disbursement within 30 days of the date of the College's determination that the student withdrew, the College has violated that deadline.

## Changing a Return Calculation

Changes that aren't corrections are allowed only if the change can be made in time for the College to meet any applicable Return of Title IV Funds deadline.

A change is not a correction if a calculation (return/post-withdrawal disbursement) was correct at the time it was processed. For example, a Financial Aid Office staff member that used the midpoint as the withdrawal date may want to go back and revise an already processed Return of Title IV Funds calculation to use the last date of attendance at an academically related activity past the midpoint. Such a change is not a correction, because the use of the midpoint was not a mistake – as would be, using the wrong amount of a Pell Grant disbursement. Similarly, the signing of a promissory note after a calculation is processed is not a correction because failing to sign a promissory note is not a mistake. CSU University is never required to do a recalculation of a change that is not a correction.

**Financial Aid Awarding Policy  
Central State University  
Wilberforce, OH**

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Area of Responsibility: Office of Financial Aid  
Responsible Contact: Director of Financial Aid  
Policy Identification: Financial Aid Awarding Policy  
Effective Date (Last Approved): For Review

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## Background and Purpose

Central State University offers financial aid to all eligible students based upon financial need and academic standing. Central State University utilizes the Free Application for Federal Student Aid (FAFSA) to determine the financial aid applicant's eligibility for grants, loans, and federal work study.

## Scope

This policy applies to all CSU Financial Aid Applicants

## Financial Need

Most of the Financial Aid programs are awarded based on financial need. When applying for Federal Student Aid via the FAFSA, the information reported by students is used in a formula established by the Department of Education. The formula calculates the **Student Aid Index (SAI)**, an amount used to determine a student's eligibility to receive need-based aid such as Pell Grants, Federal Supplemental Educational Opportunity Grants (FSEOG), Federal Work-Study (FWS), and Direct Subsidized loans. Students without need may apply for the Direct Unsubsidized loan and parents of dependent students may apply for aid through the Direct PLUS loan. The Office of Financial Aid does not automatically renew financial aid, as the SAI is recalculated each year. Students must meet the specific awarding criteria for each aid type and maintain Satisfactory Academic Progress. Financial need is determined using the formula:

$$\text{Financial Need} = \text{COA} - \text{SAI}$$

## Cost of Attendance

The cost of attendance at CSU, which includes tuition, fees, room and board, books, supplies, transportation, and personal expenses, is for an academic year (two semesters) and based on the assumption that a student will be enrolled full-time (12 to 18 credit hours) each semester. Students are awarded aid in an amount to cover up to the full Cost of Attendance, depending on eligibility and availability of funds.

## Award Notification

Each year students are required to complete a Free Application for Federal Student Aid (FAFSA) for consideration for most types of financial aid. Students may accept or decline any portion of the financial aid award package by emailing the Financial Aid Office. All aid offers are contingent on the availability of federal, state, and institutional funds and the student's continued eligibility. Students can view financial aid awards online via their official student email account.

The Office of Student Financial Aid has developed a philosophy of awarding various types of aid to students that is designed to meet several objectives given the resources available.

The objectives are:

1. Meeting the needs of as many students as possible.
2. Awarding aid up to the full cost of attendance where eligible.
3. Awarding each student the best combination of funds available based on eligibility.
4. Awarding the total amount of funds available during the award period.
5. Awarding funds according to Institutional Guidelines and/or scholarships requirements.

## Awarding Aid on the Basis of Hours Enrolled

All Financial aid awarded by the Central State University Financial Aid Office will be based on the number of hours/credits for which the student is registered. Unless the student has indicated otherwise, it is assumed that the student will be enrolling as a full-time degree seeking student each semester (minimum of twelve credit hours). The award notification letter outlines the exact types and amount of aid received for each period of enrollment during the academic year. For students who are enrolled less than full-time, all affected aid will be reduced. Other aid (*i.e.*, state grants or outside full-time scholarships) that require full-time attendance may be cancelled. Students receiving loans must be enrolled in a minimum of six credits. The Financial Aid Offices relies on data and information from the Office of the Registrar to monitor and adjust aid awards based on changes in enrollment and will adjust aid throughout the Academic Year as necessary.

## Adjustments to Financial Aid Award

If there is a change in the student's SAI, financial aid awards may be adjusted to accommodate the new SAI. Student aid awards may also be adjusted based on annual or aggregate loan maximums, changes in enrollment status (enrolled credits/hours), new information regarding student eligibility (*i.e.* Defaulted loans) or results of Satisfactory Academic Progress evaluations. Students are notified of adjustments to their aid awards via email and can review their official student account at any time for adjustments made to their Financial Aid award.

## Over Awards and Aid Reductions

Receipt of outside awards and/or resources will result in a review of financial aid packages to ensure that the student is not over-awarded. An Over Award happens when a student has more aid than the published Cost of Attendance. Over-awards are usually the result of the student receiving aid that the Financial Aid Office was not aware of when it completed the student's financial aid package and/or processed a loan application for the student. When the total of all aid received by the student exceeds the student's cost of attendance, awards will be adjusted (cancelled or reduced) in order to eliminate the over award. Federal Work-Study awards and loans will be reduced before any reduction is made to scholarship or grant awards.



**Disbursement and Reconciliation of FSA Funds Policy**  
**Central State University**  
**Wilberforce, Ohio**

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Area of Responsibility:	Office of Financial Aid
Responsible Contact:	Director of Financial Aid
Policy Identification:	Disbursement and Reconciliation of FSA Funds Policy
Effective: Date (Last Approved):	For Review

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### Background and Purpose:

The disbursement of Title IV funds is a critical component of ensuring that eligible students receive timely and accurate financial aid to support their educational expenses. This policy outlines the eligibility criteria, processes, and requirements for the disbursement of these funds, ensuring compliance with federal regulations and institutional policies.

Title IV reconciliation is the process by which a school reviews and compares Title IV aid (grants, loans, and Campus-Based aid) recorded on the United States Department of Education (USDOE) systems (COD, G6, and NSLDS) with the information in the school's internal records. Through reconciliation, disbursement and cash discrepancies are identified and resolved in a timely manner to ensure the school meets all regulatory requirements. The (USDOE) requires that institutions must document their disbursement and reconciliation processes and retain any documentation for audit and review purposes.

### Scope:

Disbursement eligibility must be reviewed, and reconciliation must be completed for all Title IV recipients (disbursing Title IV funds by crediting the student's institutional ledger account). Conducting reconciliation frequently can help ensure that the institution is properly exercising its fiduciary responsibilities to safeguard federal funds and ensure that they are used as intended. Under the cash management regulations, the institution has a fiduciary responsibility to have a system in place to:

- safeguard FSA funds.
- ensure FSA funds are used only for the purposes intended.
- act on the student's behalf to repay a student's FSA education loan debt when the school is unable to pay a credit balance directly to the student.
- return to the Department any FSA funds that cannot be used as intended.

The institution will perform internal reconciliation to compare business office records of funds requested, received, disbursed, and returned to financial aid office records of funds awarded to students. The institution will perform external reconciliation to compare the reconciled internal records to the USDOE's records of funds received and returned, and of grants or loans originated and disbursed to students at the school. Central State University will ensure that the USDOE's records reconcile with the school's records, both at the cumulative and individual student levels, when it performs external reconciliation. In addition, the institution will ensure all payments date match at the student ledger level and individual record in

COD. Reconciliation is a shared responsibility between the business office and the financial aid office. Central State University will:

- define responsibilities of key individuals and offices
- document the disbursement and reconciliation procedures.
- build in regular communication between the business office, financial aid office, and school's technical staff.
- compare internal student accounts and business office/bursar records with financial aid office records and resolve any discrepancies.
- balance all subsidiary accounts to the general ledger.
- ensure that all drawdowns and refunds of cash are accounted for and applied to the correct FSA program and award year.
- ensure that all batches have been sent to and accepted by the COD System, all disbursements and adjustments are accurately reflected in the COD System, and all responses are imported into the school's system (BANNER).
- ensure that all unbooked loans are booked or inactivated (reduced to \$0) for Direct Loans
- resolve all outstanding rejected records.
- return all refunds of cash via G6.
- request any remaining funds owed to the school based on actual disbursements accepted by the COD System (Pell, Direct Loan, TEACH) or reported as expenditures on the FISAP (Campus- Based Programs

## Responsibilities

### **Financial Aid Office:**

- Ensure compliance with Title IV regulations for awarding, disbursing, and reconciling funds.
- Notify students of disbursements and assist in resolving eligibility issues.

### **Business Office:**

- Manage the receipt and posting of Title IV funds.
- Participate in monthly and annual reconciliation processes.

### **Office of Sponsored Programs and Research**

- Return all Title IV refunds via G6.
- Participate in monthly and annual reconciliation processes.

## Disbursement Eligibility Criteria

### 1. General Eligibility:

- The student must be enrolled or accepted for enrollment in an eligible program. The institution will confirm that students actually began attendance in the period of enrollment for which the funds were awarded.
- The student must have a valid Free Application for Federal Student Aid (FAFSA) on file.
- The student must meet all federal Title IV eligibility requirements, including citizenship, Selective Service registration (if applicable), and satisfactory academic progress (SAP).

2. Enrollment Status:
  - Disbursement amounts are prorated based on enrollment status (full-time, three-quarter time, half-time, or less-than-half-time) as applicable to specific Title IV programs.
3. Verification:
  - If selected for verification, the student must complete the process and resolve all conflicting information before disbursement.
4. Financial Aid Packaging:
  - The student's financial aid package must be completed, ensuring that total aid does not exceed the student's cost of attendance (COA).
5. Outstanding Requirements:
  - Any outstanding documentation or requirements (e.g., entrance counseling, Master Promissory Note, or documentation for unusual enrollment history) must be resolved before disbursement.
6. First-Time Borrowers:
  - For first-time Federal Direct Loan borrowers, disbursement cannot occur until 30 days after the start of the program.
7. Late Disbursements:
  - Eligibility for Late Disbursement, as defined by regulations, is determined on a case-by-case basis and it must be no later than 180 days after the institution determines that the student withdrew or became ineligible.

## Disbursement Overview:

1. Timing:
  - Disbursements are scheduled by the Financial Aid Office and are generally at the beginning of each term/payment period, with subsequent disbursements made at regular intervals as needed.
2. Electronic Fund Transfers (EFTs):
  - Title IV funds are received via EFT from the USDOE and credited to the student's account by the Business Office within three business days of receipt.
3. Notification of Disbursement:
  - Students are notified in writing within 30 days of disbursement, including the amount and type of aid credited to their account.
4. Credit Balances (Refunds):
  - Credit balances resulting from Title IV funds are refunded to the student by the Business Office within 14 days of the disbursement.

## Title IV Credit Balances

Central State University defines a credit balance as when the total of the credits posted to a student's account (e.g., Payments, Loan Disbursements, Scholarships, etc.) exceed the total of the charges applied or applicable to the account for a specific term or semester. A credit balance eligible for refund to a student is one where the applicable charges and credits have been posted to the student's account and eligibility for such funds has been reviewed and confirmed or adjusted based on current enrollment, or any other applicable conditions. All students shall receive a refund of amounts over direct cost within 14 days from the date a credit is created to their student account.

## Reconciliation Criteria and Procedures

### Internal Reconciliation:

The first step in the reconciliation process is to confirm that the business office records of actual disbursements posted to student accounts are consistent with financial aid office records of student awards and scheduled disbursement amounts. Both offices should also agree on the amount of funds that should have been drawn down from G6 to cover the funds disbursed to students.

Discrepancies that occur between financial aid and business office data are usually caused by a lapse in communication. Note that these discrepancies often do not show up in comparison to the financial aid office's records to COD records, or in the comparison of drawdowns/returns between the business office and the G6 payment system. For instance:

- the financial aid office notifies the business office that the student is eligible for payment on a certain date, but the disbursement record is rejected by the COD System. If the financial aid office doesn't tell the business office to cancel the disbursement, the business office draws down funds and makes a disbursement to the student that is not supported in the COD System or in the financial aid office's records.
- the business office cancels a disbursement and/or makes a refund of cash to the G6 system without informing the financial aid office. Thus, the original amount will still be included as a disbursement but will not be reflected in the net Cash Receipts.

***NOTE: the date of disbursement listed in the student's account must also be the same date listed on COD.***

Discrepancies can be avoided by establishing daily or weekly communication touchpoints between the two offices or by scheduling a data comparison between the two office systems. Resolving differences in internal reconciliation will lead to smoother external reconciliation with the USDOE's official data.

Internal reconciliation should also include steps to reconcile cash transactions such as drawdowns and cash refunds. The institution will ensure that bank statements correctly reflect all funds drawn or returned and that this information matches the school's ledgers and other internal records. The institution will confirm that any returns of Title IV aid calculated by the financial aid office are reflected correctly in the business office student account records and that any funds that are not necessary to cover immediate need (excess cash) have been returned to the USDOE.

The institution will begin the internal reconciliation process by comparing a monthly financial aid office roster of scheduled Title IV disbursements to a monthly business office cash detail report that reflects Title IV funds drawn down and Title IV funds disbursed for the month. The institution will resolve any discrepancies if found.

In addition, the institution will compare business office and financial aid office records of adjustments (refunds of cash) made during the month. At times, returns of cash due to withdrawals performed by the financial aid office aren't applied by the business office. In addition, sometimes adjustments made by the business office aren't noted in the financial aid office. Either of these omissions can cause an internal discrepancy that will affect a school's ending cash balance and should be resolved before the institution begins the external reconciliation process.

### External Reconciliation

Central State University will reconcile its internal reconciliation records with the USDOE's COD and G6 records. The institution will perform internal reconciliation first and then external reconciliation, this way there will be fewer discrepancies to resolve during external reconciliation.

### Reconciliation In the Pell Grant Program

The institution will perform at a minimum monthly reconciliation of the school's Pell Grant Program.

Central State University will compare:

- The records of Pell Grant awards and scheduled disbursements to students made in the financial aid office to awards on individual student accounts in the business office.
- The record of disbursements in the school's Pell Grant Program ledger to the record of Pell Grants disbursed to students in the business office.
- The individual and program records of all adjustments (positive and negative) made during the period
- On an individual and program basis, the record of Pell Grants disbursed to students in the COD System to the records of Pell Grant disbursements in the business office.

Reconciliation for the Pell Grant Program will include verifying that individually and cumulatively:

- Records of student awards and pending disbursements calculated and maintained by the financial aid office match the records of pending disbursement data received or maintained by the business office.
- Business office records of actual disbursements posted to student accounts are consistent with financial aid office records of student eligibility and applicable award and disbursement amounts.
- Records of disbursements in the general ledger match those in subsidiary ledgers (e.g., student ledgers and accounts)
- The actual disbursements posted to students' accounts internally match the actual disbursements accepted in the COD System (including any adjustments to actual disbursements)
- Cumulative school and COD records of Pell Grant disbursements match net draws (drawdowns minus cash refunds) in G6 for the award year in the Pell Grant Program
- Any remaining excess cash balances have been returned to the Department per cash management regulations
- All reconciliation efforts have been documented for future reference, and all identified balance issues have been resolved in a timely manner.

### Reconciliation in the Campus-based Programs

The institution will reconcile its Campus-Based program and financial records at a minimum monthly. In addition, the institution will perform annual reconciliation of its annual participation in the Campus-Based programs when it completes the Fiscal Operations Report (FISOP). The FISOP is parts III, IV, V, and VI of the Fiscal Operations Report and Application to Participate (FISAP).

The institution will reconcile, at a minimum monthly, their Campus-Based funds drawn down through G6 to their designated bank accounts accounting for any discrepancies. In addition, the institution will have a system that reconciles the drawdowns for the award year at least monthly in the individual Campus-Based Programs, plus any funds provided by the school or received from other sources to the amounts expended in the Campus-Based programs.

### Reconciliation and the Federal Supplemental Educational Opportunity Grant (FSEOG) Program

Central State University will reconcile at least monthly and account for any discrepancies between FSEOG awards given to students during an award year plus the administrative cost allowance (ACA) and any:

- federal funds drawn down during the award year for FSEOG awards.
- funds carried forward from the prior year, carried back from the upcoming year, or transferred from FWS during the award year.
- any nonfederal funds (both institutional and noninstitutional) made available for grants to students during the award year.
- any other resources designated as FSEOG awards to students

### Reconciliation and the Federal Work-Study (FWS) Program

The institution will reconcile at least monthly the amount of funds drawn down and received to the amounts disbursed to students or returned to the Department. Specifically, these are the federal funds drawn down during the award year for FWS awards, plus funds carried forward or back, or transferred from FSEOG for that award year, plus any nonfederal (both institutional and noninstitutional) funds made available for FWS payments to students during the award year versus FWS funds paid to students during the award year, plus ACA, plus job location and development expenditures. The institution will account for any discrepancies. In addition, the institution will examine their FWS program and fiscal records at the start of the award year and monthly thereafter.

### Reconciliation in the Direct Loan Program

The institution will reconcile cash (funds it received from the G6 system to pay its students) with disbursements (actual disbursement records) it submitted to the Common Origination and Disbursement (COD) system monthly.

The institution will use as the starting point for reconciliation the ending cash balance (ECB) on the School Account Statement (SAS) that the COD System sends to the school each month. The SAS is the Department's official record of the school's cash and disbursement transactions. The ECB is simply the difference between the net drawdowns/payments your school has received from the G6 payment system and the actual disbursement information you've reported to the COD System (and the COD System has accepted) for individual students and parents (known as total net booked disbursements).

Ideally, the net drawdown/payments the school has received in the past month will be fully substantiated by the total net disbursements the school has reported (including any subsequent adjustments). Therefore, the school's monthly ECB should be as close to zero as possible keeping timing variances in mind.

Sometimes the difference between total net booked disbursements and net drawdowns/payments is just a matter of end-of-month timing— funds were delivered to the school's account at the end of one month and the disbursements were reported to the COD System at the beginning of the next month (or vice versa). If there are legitimate reasons for a positive or negative ECB from month to month, you may not need to correct or update any of the information the school has provided to the COD or G6 systems. Just document the reasons for the differences and you are done reconciling for that month.

When the ECB for a month is greater or less than zero, the institution will account for any differences between the net totals for booked disbursements and drawdowns/payments. The SAS provides

information that the Department has recorded for the school's actual disbursements to students and cash transactions (payments/drawdowns). This information is a starting point to identify the underlying reasons for the non-zero ECB.

During the review, there may be omissions or errors in the school's transactions with COD and G6 Systems. For instance, some disbursement data for the students was submitted to, but not accepted by, COD or that G6 transactions were entered for the wrong award year. In these cases, you will need to resubmit corrected disbursement records to the COD System or correct earlier transactions on the G6 system. Ensuring that the school records match exactly the data in the COD System is an example of external reconciliation.

It is also possible that the discrepancy results from inconsistencies between information in the school's financial aid system and information kept by its business office—these will need to be resolved by comparing and correcting the school's records. This is an example of internal reconciliation. To have a common set of figures to reconcile against the COD System, the school should complete an internal reconciliation prior to the required monthly external reconciliation.

#### Definitions:

- Ending cash balance—beginning cash balance + net drawdowns/payments – total net booked disbursements.
- Net drawdowns/payments—cash receipts (drawdowns + drawdown adjustments + returns) – refunds of cash (refunds)
- Total net booked disbursements—booked disbursements + booked adjustments (upward or downward)

#### Reconciling ED and School Records

The SAS (sent by COD) includes both disbursement data and cash transactions from COD. This ED system data must be reconciled with data in the school's financial aid and business offices.

#### Sources of Discrepancies

- Timing issues—funds are drawn down and disbursed in a different month from the month student/parent records are sent to COD.
- Drawdowns, drawdown adjustments, or refunds of cash made in the wrong award year.
- Disbursement batches not yet sent to COD (or sent to COD but not acknowledged)
- Rejected disbursements/adjustment to disbursement records that have not been resolved.
- Disbursements reported to COD but unbooked because of future disbursement dates.
- Downward disbursement adjustments made and accepted in COD, but funds are not returned or used for other eligible borrowers within regulatory time frames or vice versa
- Disbursements reported to COD by the aid office but not reported by the aid office to the business office for payment.
- Disbursements made by the business office but not supported by disbursement records in the financial aid office system and COD (internal reconciliation)
- School data loss (should be rare)

#### Booked vs. Unbooked Disbursements

For a disbursement to be considered booked, it must consist of the following three components:

- It must be a part of an accepted loan origination record (as submitted to the COD System by the institution)

- It must have an accepted master promissory note (MPN) associated with it (linked MPN)
- It must be reflected as an actual disbursement in the COD System (the disbursement release indicator = “True” and the date of disbursement must have occurred)

Once these three things occur, the loan is booked and sent to the loan servicer assigned to the borrower, and the student is liable in accordance with the terms and conditions stated in the MPN. Unbooked disbursements include any future-dated transactions with disbursement dates falling after the end of the report.

#### Internal Reconciliation for Direct Loans

The Financial Aid office will compare their Direct Loan records with the business office to ensure that they match, including disbursement dates and amounts. The institution will perform Direct Loan reconciliation, at a minimum once a month and will occur before the USDOE required monthly reconciliation to the Direct Loan SAS.

The business office will review its Direct Loan account bank statement to ensure that funds drawn and returned are in the appropriate year. In addition, the business office will need to regularly monitor the account to comply with cash management regulations, i.e., making sure that funds are drawn for immediate need and any funds that cannot be used within cash management guidelines are returned timely.

The Financial Aid office will communicate frequently with the business office to be in compliance with reporting disbursements and disbursement adjustments in the COD System within 15 days, making sure that their systems are in sync. It is very important that the date funds are credited to a student’s account in the institution’s general ledger or any subledger of the general ledger or paid to a student directly is the disbursement date that the institution’s FA office reports to the COD System. This date is reported to the Direct Loan servicers and is the point at which interest begins to accrue on the loan funds.

Lapses in communication between the institution’s FA office and the business office often result in discrepancies that do not show up in comparison with the financial aid office’s records with the COD System or in a comparison of drawdowns/returns between the business office and the G6 payment system. For example:

- The financial aid office notifies the business office that the student is eligible for payment on a certain date, but the disbursement record is rejected by the COD System. If the financial aid office doesn’t tell the business office to cancel the disbursement, the business office draws down funds.
- and makes a disbursement to the student that is not supported in the COD System or in the financial aid office’s records.
- The business office cancels a disbursement and/or makes a refund of cash to the G6 system without informing the aid office. Thus, the original amount will still be included in the net booked disbursements on the SAS but will not be reflected in the net cash receipts.

Daily or weekly communication occurs between the financial aid and business offices or by scheduling a data comparison between the two office systems. Resolving differences in internal reconciliation will lead to smoother external reconciliation with the Department’s official data as reflected in the SAS.

#### External Reconciliation for Direct Loans

External reconciliation is when a school compares its reconciled internal records to USDOE’s records of funds received and returned and loans originated and disbursed to students. At a minimum, the institution



will complete this reconciliation monthly to ensure that data is correct in all systems and that cash management and disbursement reporting timelines are being met. The institution will perform internal reconciliation first to ensure fewer discrepancies to resolve during external reconciliation.

### Documenting Monthly Reconciliation

A school has completed its monthly reconciliation when all differences between the Direct Loan SAS and the school's internal records (Direct Loan system, financial aid office, and business office system) have been resolved or documented and the school's ending cash balance is zero. The institution will have a clearly outlined reconciliation process and documentation in both the business office and financial aid office procedures.

## Steps in Monthly Reconciliation

1. Compare financial aid office records with business office disbursements. Look for:
  - Refunds of cash made by the business office to G6 but not recorded in the financial aid office system.
  - Disbursements made by the business office but not recorded in the financial aid office system or not sent to COD and accepted.
  - Instances when the financial aid office calculated a return of aid and reported a downward adjustment to COD, but the information was not recorded in the business office system and the funds were not returned to G6.
2. Reconcile with SAS data from USDOE. Upon receiving the monthly SAS, first compare the cash summary information to your internal records. If the subtotals and ECB match or any discrepancies can be explained and documented, you are done. If not, then proceed with the next step of comparing SAS cash detail with student account records in the business office (or elsewhere). Look for:
  - End-of-month submissions that were processed by COD in the next month.
  - Cash transactions attributed to wrong award years.
  - Funds drawn down from one award year but "recycled" to make disbursements for loans in a different award year.
4. Compare SAS loan/disbursement details with financial aid office records. (The "Loan Compare" function in DL Tools can be used to import school data and compare it to the SAS loan disbursement detail.) Look for:
  - Disbursement batches not yet sent to COD (or sent to COD but not acknowledged)
  - Rejected disbursements that have not been resolved.
  - Disbursements reported to COD but unbooked because of future disbursement dates.
5. Remember, you must document reasons for any discrepancies in the ECB. The institution will maintain documented results of its monthly reconciliation to provide to auditors and reviewers at their request. Keep in mind that historical records of reconciliation issues can be useful for later review or to update new or returning staff members. Each month you should:
  - Identify, resolve, and document all discrepancies. Track those due to timing to make sure that the missing transactions appear in the next month's SAS.

- Identify any discrepancies due to misreporting or internal miscommunication and take necessary corrective actions to ensure they will not recur in the following month.
- Document all reconciliation efforts, including any reasons for an ending cash balance, for future reference.

## The School Account Statement

The institution will reconcile the information on the SAS to its internal records monthly. If more frequent reconciliation is needed, the institution will request an SAS disbursement detail on demand report on an as-needed basis. The SAS is like a bank statement and gives the Department's official cash balance as of the end date of the reported period, based on data submitted by the school. It also gives detailed cash and loan or disbursement transactions for that reported period.

Each month the COD System sends the SAS to the SAIG Mailbox. This report is generated by the COD System during the first full weekend (Saturday and Sunday) of the month with data through the end of the previous month (for example, the first weekend in September, the COD System generates a report for August and sends it to the school). The SAS reflects all cash transactions performed in G6 as reported to the COD System and all loan and disbursement details reported by the school and accepted in the COD System.

**Note: The institution will receive a separate SAS for each award year that it participates in the Direct Loan program until processing the current award year is closed out as directed by ED. Since schools often have multiple award years open at the same time, they may receive more than one SAS for a month.**

The SAS is broken down into the following four sections:

1. Cash summary
2. Disbursement summary (by loan type)
3. Cash detail report
4. Loan or disbursement detail report

Three sections of the SAS are particularly useful for reconciliation:

1. *Cash Summary*: This section of the SAS provides the USDOE's official ECB for the school for the reported period. The ECB is the difference between net drawdown of cash and net booked disbursements. The cash summary contains both a monthly and a year-to-date (YTD) summary of cash and loan data processed in the COD System for that program year. This section can be compared to summary information on the school's internal systems. The comparison may then identify areas where further research is needed.

Ultimately, if a school's net drawdowns/payments are equal to its total net booked disbursements, its ECB will equal zero.

2. *Cash Detail*: The cash detail section of the SAS provides detail on cash transactions processed in the COD System during the reported period. This includes drawdowns, drawdown adjustments, or refunds of cash. If the monthly option is chosen, this section will only include cash transactions processed in the COD System during that month. If the YTD option is chosen, the section will include cash transactions processed

in the COD System from the start of the program year through the end date of the report. If you choose the monthly option, this section will not include any cash transactions requested or sent during the month but not processed in the COD System until after the last day of that month.

*3. Loan Disbursement Detail:* The Loan Detail/Loan Disbursement Activity Level section of the SAS contains loan detail transactions at either the loan level or the individual disbursement transaction level, depending on the school options chosen. If loan details are requested at the loan level, the SAS will contain one record per loan, with YTD disbursement information. If loan details are requested at the disbursement activity level, the SAS will contain all actual disbursement and disbursement adjustment activity that occurred during the preceding month or year-to-date (depending on the options selected by the school) as reported by the school and accepted by the COD System. This portion of the report is helpful because it allows schools to match individual (student by student) COD accepted disbursements and adjustments against the individual disbursements and adjustments reflected in the school's financial aid system. By identifying discrepancies between disbursements in the COD System and your financial aid system, you will be able to resolve the differences. In the following sections, we'll explain how to compare the summary and detail reports to your school data to identify any underlying discrepancies that may be affecting the ECB.

## Reconciling USDOE (COD) and School Records

The SAS (sent by COD) includes both disbursement data and cash transactions at COD (but received from G6). This data in USDOE systems must be reconciled with data in the school's financial aid office and business office. Discrepancies can occur for a variety of reasons, such as:

- Timing issues—funds are drawn down and disbursed in a different month from the month student/parent records are sent to COD.
- Misreporting of drawdowns or returns of aid—for instance, drawdowns or returns attributed to the wrong award year.
- Actual disbursements or adjustments that have not been processed in COD—including records batched but not sent by the financial aid office, and unresolved reject.
- Actual disbursements reported to COD by the aid office but not to the business office for payment.
- Payments made or not made by the business office that are not reported to the financial aid office.

## Other Tools and Reports for Direct Loan Reconciliation

### COD Reports

- School Account Statement (SAS)—The Department issues an award year- specific SAS, like a bank statement, monthly to schools participating in the Direct Loan Program. The SAS contains the Department's official ending cash balance for the school and award year, as well as a record of all detailed transactions (cash and actual disbursement data) processed in the COD System during the reported period. Use the summary- and detail-level information contained in the SAS to reconcile to its internal records.
- SAS disbursement detail on demand—ad-hoc report that allows schools to get SAS disbursement detail data independent of the school's monthly SAS file. This report can be requested via the new report request page on the COD website.

- SAS disbursement detail on demand report reader and instructions—formats the fixed length SAS disbursement detail on demand report into an Excel spreadsheet. Found under the COD resources link at the bottom of any COD website page.
- Pending Disbursement Listing—This report provides a list of all pending disbursements reported and can help identify future funding needs, identify pending disbursements that should be reported as actual, and identify awards or disbursements that need to be deactivated (reduced to zero).
- Direct Loan Actual Disbursement List—This weekly report displays actual disbursements from the previous Saturday (seven days before the report generation date) through the following Friday (one day before the report generation date). Actual disbursements appear on the report based on the date posted indicating when each actual disbursement or adjustment is posted on the COD System. The report includes booked, unbooked, and future dated actual disbursements and adjustments, provided they are created within the reporting period.

#### COD Webpages

- School Summary Information—Provides an overview of the current funding level (CFL) as well as cash greater than accepted and posted disbursements over 30 days. It is a great tool to confirm that the institution is reporting disbursements in a timely manner to substantiate the funds drawn.
- School Funding Information and School Funding History Report—Lists the current available balance, net drawdowns, net accepted and posted disbursements, and cash > net accepted and posted disbursement balances as well as last CFL changes. The institution will make reviewing the balances for each program and award year on this page a regular part of the processes. The school funding history report can be accessed through a link at the bottom of the school funding information screen. This report displays year-to-date funding authorization (current funding level or CFL) information, program type, and award year. This report also contains a history of cash activity transactions.
- School Summary Financial Information—Provides close to real time balance information, formatted similarly to the year-to-date cash summary section of the SAS.
- Cash Activity—Provides up-to-date drawdown and refund of cash detail activity as well as days remaining for on time reporting. This information is sent to the COD System from G6 and can be used to reconcile internal bank statements and cash transactions.
- Anticipated Disbursement Queue—The anticipated disbursement queue page on the COD website allows you to view anticipated disbursements currently on file in the COD System and to search by award year, program, disbursement date range, and SSN. They can select up to one hundred records at a time and submit them as actual disbursements and can also export the anticipated disbursement list.

### Central State University Best Practices for Reconciliation

During the month, the financial aid and business offices will ensure:

- all funds received have been substantiated with actual accepted disbursements in the COD System by regularly checking the financial aid database for any unsent or rejected batches and/or disbursements.
- any downward adjustments have been accompanied by either a refund of cash or a disbursement of funds to another eligible student in the same program and award year (within cash management regulations)
- any excess funds have been returned to the Department as a refund of cash.
- all funds requested are for disbursements to be made within the period of immediate need (three business days) and that funds are disbursed within that period or returned to the Department
- all awards and disbursements are reported within the 15-day reporting period allowed by regulation
- after the disbursement date, the reconciliation process will take place no later than 5 business days after disbursement unless this date is near the month-end close date.
- If the disbursement is near the month-end close date, reconciliation will be completed before the close of the prior month.
- After the reconciliation is complete, the Office of Sponsored Programs and Research (OSPR) is notified to request funds from G6.
- OSPR verifies that the general ledger agrees with the amount of the funds to be requested. Additionally, OSPR reviews the COD documentation and ensures it agrees with the general ledger and G6.

**Record Retention Policy  
Central State University  
Wilberforce, OH**

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Area of Responsibility: Office of Financial Aid  
Responsible Contact: Director of Financial Aid  
Policy Identification: Record Retention Policy  
Effective: Date (Last Approved): For Review

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## Background and Purpose

In compliance with 34 CFR § 668.24, Central State University maintains accurate and complete records for all Title IV Federal Student Aid programs. CSU maintains the financial and other institutional records necessary to determine its institutional eligibility, financial responsibility, and administrative capability.

The college, via the Title IV Program Participation Agreement and its state and accreditation records, has established and maintains records that document the eligibility of its academic programs for Title IV funds. The required records are readily available for review by any authorized entity or authorized CSU representatives. All required records are maintained in acceptable formats as specified by regulatory authorities. Authorized requests for records can be made to the Director of Financial Aid. This policy ensures proper documentation, retention, and accessibility of financial aid records to support program integrity and regulatory compliance.

## Scope

This policy applies to all financial aid staff, administrators, and departments responsible for handling Title IV financial aid records, including but not limited to student eligibility, application materials, disbursement records, and program administration.

## Record-Keeping Requirements

### Types of Records Maintained

Central State University will maintain the following records as required by **34 CFR § 668.24**:

- Student Eligibility Records: FAFSA applications, verification documents, student enrollment status, satisfactory academic progress (SAP) evaluations, and professional judgment determinations.
- Financial Aid Disbursement Records: Award letters, loan origination records, grant disbursement reports, and refund calculations.
- Program Administration Records: Reconciliation reports, Return of Title IV Funds (R2T4) calculations, compliance audit reports, Cost of Attendance (Budget) records and program participation agreements.
- Fiscal Records: General ledger accounts related to Title IV aid, bank account reconciliations, and student account ledgers.

In some cases, information from the above records must be shared with the U.S. Department of Education in support of processing Federal Student Aid for CSU students (i.e. entering or transmitting program Cost of Attendance data to the Common Origination and Disbursement system, updating student level enrollment data in the National Student Loan Database, etc.) or to maintain compliance with the overall administration of Federal Student Aid Programs. All financial aid and disbursement transactions records are maintained in a systematically organized manner, with each student having their own Financial Aid file and Account Ledger transaction records. In addition to Financial Aid records, CSU maintains records regarding each Title IV recipient's admission, enrollment status, program and courses, and academic progress.

### Record Retention Period

Per 34 CFR § 668.24, all Title IV-related records will be retained for a minimum of three (3) years **from** the end of the award year in which the aid was awarded and disbursed. However, records associated with audits, program reviews, or legal actions will be retained until the issue is resolved, even if it extends beyond the three-year requirement.

### Storage and Accessibility

- Records will be maintained in both electronic and paper formats.
- Secure storage solutions, including password-protected databases and locked file cabinets, will be used to prevent unauthorized access.
- Financial aid records will be readily accessible for compliance reviews, audits, and regulatory inspections.

### Security and Confidentiality

- Access to student financial aid records will be restricted to authorized personnel only.
- Compliance with FERPA (Family Educational Rights and Privacy Act) and institutional data protection policies will be enforced.
- Regular security audits will be conducted to ensure data protection and prevent unauthorized access.

The aforementioned policies and procedures will be reviewed and updated as necessary to ensure compliance with FSA regulations.

## **File Review and Federal Verification Policy Central State University, Wilberforce, OH**

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Area of Responsibility: Office of Financial Aid  
Responsible Contact: Director of Financial Aid  
Policy Identification: File Review and Federal Verification

Effective: Date (Last Approved): For Review

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### **Background**

To be considered for federal student aid, a student must complete the Free Application for Federal Student Aid (FAFSA). The FAFSA collects financial and other information used to calculate the student/family Expected Family Contribution (EFC) and to determine a student's eligibility. The U.S. Department of Education (USDOE) has developed a process for schools to verify FAFSA application data and to make corrections where necessary. The Federal Verification process must be completed for applicants selected by the USDOE's Central Processing System (CPS) and for those selected by the institution. There are exclusions to completing the verification process; however, they are rare and regulated by the USDOE. Additionally, the institution conducts a File Review to ensure that Comment Codes and Conflicting Information is also resolved prior to the disbursement of aid.

### **Purpose**

The USDOE also requires that institutions have written policies describing certain components of the verification process and institutional procedures. The institution has established the following policy in accordance with the Federal Student Aid Handbook, the NASFAA Verification Self-Evaluation Guide and Federal Registers. Central State University utilizes a Third-Party software and servicer to manage its File Review and Federal Verification process, Campus Logic. With that, the institution still retains ultimate responsibility for compliance with File Review and Federal Verification requirements.

### **Scope**

The Department of Education (ED) will randomly select student applications for verification. This affects a small percentage of a school's applicant pool, but all applicants selected by ED must be verified unless there is an exception regulated by ED. Central State University is also allowed and reserves the right to institutionally select applicants for verification if we have reason to believe that FAFSA information is not accurate, or that there is conflicting information that needs to be resolved. The Financial Aid Office (FAO) will be alerted if a student's application has been selected for verification via comment codes and text appearing on the institutional Student Information Record (ISIR), which is the school output document resulting from the student's FAFSA. This document describes the institution's policy for compliance with the USDOE standards and requirements related to File Review and the Federal Verification process.

### **Required Policies and Procedures**

The following requirements are addressed within this policy:

- The time-period in which students must submit verification documentation,
- The consequences for failing to submit those documents in time,



- The method used to notify students if their Title IV aid amounts change,
- The procedure we will follow to correct FAFSA data,
- The procedure we will follow to refer a student to the Office of Inspector General (OIG).
- Notification to students selected for verification of an explanation of their rights and responsibilities,
- Completing verification for a selected student if required, before exercising professional judgment.

## Selection of Applicants

Per Federal regulations, the institution will verify applications selected by ED of students who will receive or have received subsidized student financial assistance; the Pell Grant, Federal Educational Opportunity Grant (FSEOG), Federal Work-Study (FWS) and Direct Subsidized Loan programs. Verification is not required for students who are only eligible for unsubsidized student financial assistance; the Teacher Education Assistance for College and Higher Education Grant (TEACH), Direct Unsubsidized Loan, Direct PLUS loan programs; the Iraq and Afghanistan Service Grant. However, the institution may select any aid applicant for which it believes there is inaccurate or conflicting information. Students who are eligible for both subsidized and unsubsidized Title IV aid may not avoid verification by accepting only unsubsidized aid; they must complete verification to receive any Title IV aid.

## Tracking Groups and Documents Required for Federal Verification

There are several tracking groups for which the student could be assigned as part of the Federal Verification process. The Department of Education has defined the verifiable items required for each tracking group. Central State University will adhere to all verification requirements established by the U.S. Department of Education in accordance with [34 CFR 668.56](#)

## Changing Tracking Groups

A student may move from Verification Tracking Group V1 or V4 to group V5 based on corrections made to his or her ISIR or on other information available to the Department. If verification was already completed for the previous group, the student is only required to verify the V5 information that was not already verified. If verification was not completed for the previous group, the student needs to verify all the required V5 information.

No disbursements of Title IV aid may be made until the V5 verification is satisfactorily completed. If the student doesn't complete verification, the school is not liable for any Title IV aid it disbursed prior to receiving the group V5 ISIR. The student is liable for the full amount because without verification there is no evidence he or she was eligible for that aid.

## Acceptable Documentation

The following chart lists, for the 2024-2025 award year, the FAFSA information that an institution and an applicant and, if appropriate, the applicant's parent(s) or spouse may be required to verify. The chart also lists the acceptable documentation that must be provided to Central State University for that information to be verified.

FAFSA information	Acceptable documentation
<p><i>Income information for tax filers</i> (a) Adjusted Gross Income (AGI) (b) Income Earned From Work (c) U.S. Income Tax Paid (d) Untaxed Portions of IRA Distributions (e) Untaxed Portions of Pensions (f) IRA Deductions and Payments (g) Tax Exempt Interest Income (h) Education Credits (i) Foreign Income Exempt from Federal Taxation</p> <p><i>Income information for tax filers with special circumstances</i> (a) Adjusted Gross Income (AGI) (b) Income Earned from Work (c) U.S. Income Tax Paid (d) Untaxed Portions of IRA Distributions (e) Untaxed Portions of Pensions (f) IRA Deductions and Payments (g) Tax Exempt Interest Income (h) Education Credits (i) Foreign Income Exempt from Federal Taxation</p>	<p>Items a through h, if transferred directly from the IRS and unchanged, do not need to be verified. When information is not transferred from the IRS, and for item i, the following documentation is sufficient for verification: (1) A transcript <sup>1</sup> obtained at no cost from the IRS or other relevant tax authority of a U.S. territory (Guam, American Samoa, the U.S. Virgin Islands) or commonwealth (Puerto Rico and the Northern Mariana Islands), or a foreign government, that lists 2022 tax account information of the tax filer; or (2) A copy of the income tax return <sup>1</sup> and the applicable schedules <sup>1</sup> that were filed with the IRS or other relevant tax authority of a U.S. territory, or a foreign government that lists 2022 tax account information of the tax filer. (3) If item d or e contains a rollover, collect a signed statement confirming the amount of the rollover in the untaxed pension or IRA distribution. Note that even if d or e are transferred as FTL, rollovers still need to be verified as they are manually entered.</p> <p>(1) For a student, or the parent(s) of a dependent student, who filed a 2022 joint income tax return and whose income is used in the calculation of the applicant's student aid index and who at the time the FAFSA was completed was separated, divorced, widowed, or married to someone other than the individual included on the 2022 joint income tax return— (a) A transcript obtained from the IRS or other relevant tax authority that lists 2022 tax account information of the tax filer(s); or (b) A copy of the income tax return and the applicable schedules that were filed with the IRS or other relevant tax authority that lists 2022 tax account information of the tax filer(s); and (c) A copy of IRS Form W-2 <sup>2</sup> for each source of 2022 employment income received or an equivalent document. <sup>2</sup></p>
	<p>(2) For an individual who is required to file a 2022 IRS income tax return and has been granted a filing extension by the IRS beyond the automatic six-month extension for tax year 2022— (a) A signed statement listing the sources of any 2022 income and the amount of income from each source; (b) A copy of the IRS's approval of an extension beyond the automatic six-month extension for tax year 2022; <sup>3</sup> (c) A copy of IRS Form W-2 <sup>2</sup> for each source of 2022 employment income received or an equivalent document; <sup>2</sup> and (d) If self-employed, the signed statement must indicate the amount of estimated AGI and U.S. income tax paid for tax year 2022.</p>

(3) If d or e contains a rollover, collect a signed statement confirming the amount of the rollover in the untaxed pension or IRA distribution. Note that even if d or e are transferred as FTI, rollovers still need to be verified as they are manually entered.

*Note:* An institution may require that, after the income tax return is filed, an individual granted a filing extension beyond the automatic 6-month extension submit tax information by obtaining a transcript from the IRS, or by submitting a copy of the income tax return and the applicable schedules that were filed with the IRS that lists 2022 tax account information. When an institution receives such information, it must be used to reverify the income and tax information reported on the FAFSA.

(4) For an individual who was the victim of IRS tax-related identity theft—  
• A Tax Return DataBase View (TRDBV) transcript<sup>1</sup> obtained from the IRS;  
and  
• A statement signed and dated by the tax filer indicating that he or she was a victim of IRS tax-related identity theft and that the IRS has been made aware of the tax-related identity theft.

*Note:* Tax filers may inform the IRS of the tax-related identity theft and obtain a TRDBV transcript by calling the IRS's Identity Protection Specialized Unit (IPSU) at 1-800-908-4490. Unless the institution has reason to suspect the authenticity of the TRDBV transcript provided by the IRS, a signature or stamp or any other validation from the IRS is not needed. (5) For an individual who filed an amended income tax return with the IRS, a signed copy of the IRS Form 1040X that was filed with the IRS for tax year 2022 or documentation from the IRS that include the change(s) made to the tax filer's 2022 tax information, in addition to one of the following— (a) Updated income and tax information from the IRS or an ISIR record with all tax information from the original tax return; (b) A transcript obtained from the IRS that lists 2022 tax account information of the tax filer(s); or (c) A signed copy of the 2022 IRS Form 1040 and the applicable schedules that were filed with the IRS.

*Income information for non-tax filers*  
Income Earned from Work

For an individual who has not filed and, under IRS or other relevant tax authority rules (e.g., the Republic of the Marshall Islands, the Republic of Palau, the Federated States of Micronesia, a U.S. territory or commonwealth or a foreign government), is not required to file a 2022 income tax return—

(1) A signed and dated statement certifying— (a) That the individual is not required to file a 2022 income tax return; and (b) The sources and amounts of earnings, other income, and resources that supported the individual(s) for the 2022 tax year;

(2) For individuals without a Social Security number (SSN), Individual Taxpayer Identification Number (ITIN), or Employer Identification Number (EIN), that they do not have an SSN, ITIN, or EIN;

(3) A copy of IRS Form W-2 <sup>2</sup> for each source of 2022 employment income received or an equivalent document <sup>2</sup>; and

(4) Except for dependent students, verification of non-filing <sup>4</sup> for individuals who would file a return with a relevant tax authority other than the IRS dated on or after October 1, 2023.

*Note:* The collection of documentation to verify income earned from work is also used to determine if the applicant (and the applicable spouse or parent) was required to file a U.S. income tax return for the 2022 tax year.

Family Size

Since family size is based on the number of individuals listed and claimed on the IRS tax return, if transferred directly from the IRS and unchanged, family size does not need to be verified. However, when information is not transferred from the IRS, or if the applicant updated their family size when presented with the opportunity to do so on their FAFSA, the following documentation is sufficient for verification:

A statement signed by the applicant and, if the applicant is a dependent student, by one of the applicant's parents, that lists the name and age of each family member for the 2024-2025 award year and the relationship of that family member to the applicant.

*Note:* Verification of family size is not required if—

- For a dependent student, the family size indicated on the ISIR is two and the parent is single, separated, divorced, or widowed, or the household size indicated on the ISIR is three if the parents are married, remarried or unmarried and living together; or
- For an independent student, the family size indicated on the ISIR is one and the applicant is single, separated, divorced, or widowed, or the household size indicated on the ISIR is two if the applicant is married or remarried.

Identity/Statement of Educational Purpose

(1) An applicant must appear in person and present the following documentation to an institutionally authorized individual to verify the applicant's identity:

(a) An unexpired valid government-issued photo identification<sup>5</sup> such as, but not limited to, a driver's license, non-driver's identification card, other State-issued identification, or U.S. passport. The institution must maintain an annotated copy of the unexpired valid government-issued photo identification that includes—

- i. The date the identification was presented; and
- ii. The name of the institutionally authorized individual who reviewed the identification; and

(b) A signed statement using the exact language as follows, except that the student's identification number is optional if collected elsewhere on the same page as the statement:

*Statement of Educational Purpose*

I certify that I \_\_\_\_\_ am

(Print Student's Name)

the individual signing this Statement of Educational Purpose and that the Federal student financial assistance I may receive will only be used for educational purposes and to pay the cost of attending for 2024-2025.

(Name of Postsecondary Educational Institution)

\_\_\_\_\_

(Student's Signature)      (Date)

\_\_\_\_\_

(Student's ID Number)

(2) If an institution determines that an applicant is unable to appear in person to present an unexpired valid government-issued photo identification and execute the Statement of Educational Purpose, the applicant must provide the institution with— (a) A copy of an unexpired valid government-issued photo identification,<sup>5</sup> such as, but not limited to, a driver's license, non-driver's identification card, other State-issued identification, or U.S. passport that is acknowledged in a notary statement or that is presented to a notary; and (b) An original notarized statement signed by the applicant using the exact language as follows, except that the student's identification number is optional if collected elsewhere on the same page as the statement:

*Statement of Educational Purpose*

I certify that I \_\_\_\_\_ am

(Print Student's Name)

the individual signing this Statement of Educational Purpose and that the Federal student financial assistance I may receive will only be used for educational purposes and to pay the cost of attending \_\_\_\_\_ for 2024-2025.

(Name of Postsecondary Educational Institution)

\_\_\_\_\_

(Student's Signature)      (Date)

\_\_\_\_\_

(Student's ID Number)

<sup>1</sup> This footnote applies, where applicable, whenever an income tax return, the applicable schedules, or transcript is mentioned in the above chart.

The copy of the 2022 income tax return must include the signature of the tax filer, or one of the filers of a joint income tax return, or the signed, stamped, typed, or printed name and address of the preparer of the income tax return and the preparer's Social Security number, Employer Identification Number, or Preparer Tax Identification Number.

For a tax filer who filed an income tax return other than an IRS form, such as a foreign or Puerto Rican tax form, the institution must use the income information (converted to U.S. dollars) from the lines of that form that correspond most closely to the income information reported on a U.S. income tax return.

An individual who did not retain a copy of his or her 2022 tax account information, and for whom that information cannot be located by the IRS or other relevant tax authority, must submit to the institution—

- a. Copies of all IRS Form W-2s for each source of 2022 employment income or equivalent documents; or
- b. If the individual is self-employed or filed an income tax return with a government of a U.S. territory or commonwealth or a foreign government, a signed statement certifying the amount of AGI and income taxes paid for tax year 2022; and
- c. Documentation from relevant tax authorities other than the IRS that indicates the individual's 2022 tax account information cannot be located; and
- d. A signed statement that indicates that the individual did not retain a copy of his or her 2022 tax account information.

If an individual who was the victim of IRS tax-related identity theft is unable to obtain a TRDBV, the institution may accept an equivalent document provided by the IRS or a copy of the signed 2022 income tax return the individual filed with the IRS.

<sup>2</sup> An individual who is required to submit an IRS Form W-2 or an equivalent document but did not maintain a copy should request a duplicate from the employer who issued the original or from the government agency that issued the equivalent document. If the individual is unable to obtain a duplicate W-2 or an equivalent document in a timely manner, the institution may permit that individual to provide a signed statement, in accordance with 34 CFR 668.57(a)(6), that includes—

- (a) The amount of income earned from work;
- (b) The source of that income; and
- (c) The reason why the IRS Form W-2, or an equivalent document, is not available in a timely manner.

<sup>3</sup> For an individual who was called up for active duty or for qualifying National Guard duty during a war or other military operation or national emergency, an institution must accept a statement from the individual certifying that he or she has not filed an income tax return or a request for a filing extension because of that service.

<sup>4</sup> If an individual is unable to obtain verification of non-filing from a relevant tax authority and, based upon the institution's determination, it has no reason to question the student's or family's good-faith effort to obtain the required documentation, the institution may accept a signed statement certifying that the individual attempted to obtain the verification of non-filing from the relevant tax authority and was unable to obtain the required documentation.

<sup>5</sup> An unexpired valid government-issued photo identification is one issued by the U.S. government, any of the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, a federally recognized American Indian and Alaska Native Tribe, American Samoa, Guam, the Virgin Islands, the Commonwealth of the Northern Mariana Islands, the Republic of the Marshall Islands, the Federated States of Micronesia, or the Republic of Palau.

## Reporting Results for V4 and V5 Tracking Groups

Starting with the 2022–23 award year, if a student is selected for verification under the V4 or V5 verification tracking group, institutions will not be required to obtain verification of high school completion documentation. This means for the V4 tracking group, institutions will only be required to obtain student identity and statement of educational purpose information. For the V5 tracking group, institutions will still verify all items from Verification Tracking Group V1 (financial and tax information, household size), along with student identity and statement of educational purpose; however, institutions will not be required to obtain documentation of high school completion (unless the institution's admission policy requires documentation; the CSU admissions policy requires this documentation). This information is reported online via the ED website. The institution is required to report results no more than 60 days following its first request to the student for documentation of identity. Inaccurate and untimely reporting may subject the school to audit findings. If there is a change in a result already submitted, you can submit the new code and must make that change within 30 days of becoming aware that a change occurred. The most recent submission will supplant prior award year submissions. The confirmation page must be printed and maintained on file.

## Notification to Student, Timeline for Completion of Verification and Interim Disbursements

The institution has programmed its FA Student Information System (SIS) to automatically assign verification documents upon receipt of the ISIR record, and to notify the student via a Missing Information Letter (sent via email and made available online to the student). The institution's missing information letter describes the document requirements depending on the Verification Tracking Group, the timeline for completion and consequences of not completing the File Review and Verification process. In general, students are expected to submit Verification documents by March 1 of each Academic Year. However, due to FAFSA filing dates, internal processing schedules and other operational priorities, students are normally expected to submit verification documents within 30 days of receipt of the written Missing Information Letter. However, Federal Verification will be completed for students up to 120 days after the student's enrollment in the award year, assuming all other eligibility criteria have been met (valid ISIR, corrected ISIR, began attendance, etc.). We will notify the students that they have been selected for verification via email, along with their rights and responsibilities. If students fail to complete the Federal Verification process, they forfeit any aid for which they may have been eligible to receive. Central State University does not make interim disbursements of aid while students complete the Verification process. The institution will complete verification upon receipt of all documents required and notify the student of Verification results in writing via email or via online access to the student portal, including any changes to the students aid eligibility as a result of Verification.

## Verification Process

If the student submits the required documents, the verification process will commence. The following actions may be taken throughout the verification process:

- Confirm the receipt and accuracy of all documents.
- Compare the ISIR field values to the information submitted on the Verification Worksheet and any other documents received.
- Utilize the Tax Transcript Matrix to identify the appropriate fields and values on the tax documents.
- Identify the discrepant items and note the items that indicate an ISIR correction is required if a



discrepancy exists.

- Update the Verification Status Code only after the review and all corrections have been made.
- notify the student when verification is completed (via SIS entry, email, or other secured media).
- notify the student when additional documentation is required (via SIS entry, email, or other secured media).
- notify the student when corrections have been made as a result of verification and the impact to eligibility (via SIS entry, email, or other secured media).
- report changes and corrections due to verification or the resolution of conflicting information directly to the FPS via the student information system (SIS).
- If the student requests Professional Judgment, verification will be completed (if selected) prior to exercising professional judgment.

**NOTE:** Changes to the ISIR will only be made if an ISIR correction is required due to verification, conflicting information or student error and there must be supporting documents in the student file. Verification documents, signed student statements, or other documentation submitted by the student will support the corrections. Applicants that are not selected for verification by ED or who are exempt from verification but choose to submit taxes or other supplemental forms will not be considered selected for verification. However, all documents provided to the institution will be used in reviewing the student application and as the basis for correcting reported application items. A student's submission of documentation that is not required may result in conflicting information, which the institution will resolve prior to completing verification, or notify the student of the requirement to resolve the conflict.

## Separation of Income

If a selected student filed a joint income tax return for the required tax year (or the parents of a dependent student), but the student (or the parent) is considered separated, divorced, or widowed at the time the student completes the FAFSA, the student 's (or parent's) income must be separated out from the former spouse 's income.

The following forms are required to complete the division of income process:

- Joint federal tax return
- Applicable tax schedules
- Applicant (or parent) and spouse W2's
- A signed statement (in lieu of W2's if unable to obtain)

Certain information is required to be reviewed to complete the division of income calculation. The institution will utilize the following fields and information identified below:

### Using A Joint Return to Figure Individual AGI And Taxes Paid

If the filer of a joint return has become widowed, divorced, or separated since filing the return, it may be necessary to determine the individual's income and taxes paid using the joint return and W-2 forms. If a W-2 is not available (the filer is self-employed for example) or if a duplicate copy from the employer who issued the original W-2 is not available in a timely manner, the school may permit the filer to provide a signed statement that certifies the base year AGI and U.S. taxes paid. If he has divorced and married someone new, then the new spouse's income and assets would also need to be included. Add the income amounts from the individual's W-2 forms to any other income that can be extracted from the joint return. Any interest or business income earned on joint accounts or investments should be

assessed at 50%. The same procedure should be used to divide business or farm losses. Also, if the AGI listed on the joint return was adjusted, you should reduce the individual's AGI by the portion of the adjustment that applies solely to him or her. For example, if an adjustment was made for moving expenses, which applies to the couple jointly, only 50% of the adjustment amount can be applied against the individual's income. An AGI figure can be calculated for the individual filer. A signed statement from the filer certifying that the data from the joint return were accurately assessed is sufficient documentation for this method. Use one of the following methods to figure the individual's taxes paid:

- Tax table (CSU preferred method):  
Using the IRS Tax Table or Tax Rate Schedule for the appropriate year, calculate the amount of tax that would have been paid if a separate return had been filed. Use the deduction and number of exemptions the individual could have claimed if he or she had filed a separate return. (If itemized deductions were taken, count only the portion of those deductions that could have been claimed on a separate tax return.)
- Proportional distribution:  
Determine what percentage of the joint AGI was attributable to the individual, and then assess the joint taxes paid by that same percentage.

## Conflicting Information

Central State University resolves conflicting financial aid application data for all aid applicants. Conflicting information is resolved regardless of whether the applicant was selected for verification. If conflicted data is present, appropriate documentation is requested from the student (via SIS entry, email, or other secured method).

The institution does not consider the following as conflicting information:

- Tax Exemptions different from Household Size
- Dependent members of the Household above the age of 24 years old
- Marital Status and Tax Filing status when Marital status date supports tax filing status (i.e., divorced in 2021, Married Filing Joint in 2020)
- assumptions made by the USDOE Federal Processing System
- student excluding himself from verification worksheet (adjustments to household size necessary)
- zero income reported with Federal Means Tested Benefits received.

## Resolution of Conflicting Information

Central State University does not disburse aid until it has resolved conflicting information. The institution has resolved any conflict when it has determined which data is correct, used that data to complete the verification process, made all appropriate corrections and documented the circumstances. All determinations must be clearly documented in the student file and/or SIS.

## Resolution of C-Codes

The institution will resolve all C-Codes identified on ISIRs by obtaining appropriate documentation from the student and/or their family. No federal student aid will be disbursed until all flagged issues are resolved, and the student's eligibility is confirmed.

## Acceptable Documentation

### Citizenship Status (C-Code: 146-149)

- **Acceptable Documentation:**
  - U.S. passport or passport card.
  - Certificate of Citizenship (Form N-560 or N-561).
  - Certificate of Naturalization (Form N-550 or N-570).
  - Permanent Resident Card (I-551).
  - Immigration status documentation from the Department of Homeland Security (DHS)

### Selective Service (C-Code: 30)

- **Acceptable Documentation:**
  - Selective Service registration confirmation
  - Written statement or official documentation explaining exemption (e.g., born before 1960, female, or certain visa holders).

### Default on Federal Loans or Overpayment of Federal Aid (C-Code: 115-116)

- **Acceptable Documentation:**
  - Letter from the loan servicer or guaranty agency confirming the loan is no longer in default.
  - Letter from the Department of Education confirming the overpayment has been resolved.

### Unusual Enrollment History (C-Code: 359)

- **Acceptable Documentation:**
  - Official transcripts from all previously attended institutions during the flagged award years.
  - Written explanation for unusual enrollment patterns (e.g., medical issues, personal hardship) supported by third-party documentation if applicable.

### Social Security Number (C-Code: 63)

- **Acceptable Documentation:**
  - Copy of the student's Social Security card.
  - Documentation from SSA confirming the correction of their records.

### Drug Convictions (C-Code: 53)

- **Acceptable Documentation:**
  - Completion of a qualified drug rehabilitation program.
  - A written statement detailing the dates of convictions and confirmation of completion of any required rehabilitation.

## Resolution Process

Students will be notified through their institutional email or student portal regarding the C-Code(s) on their ISIR, the required documentation, and submission deadlines. Students must submit all required documentation to the Financial Aid Office within 30 days of notification. The Financial Aid Office will

review all submitted documentation. If corrections to the FAFSA are required, the Financial Aid Office will make updates through the Department of Education's Federal Processing System (FPS). Students will be notified of the resolution outcome and any changes to their financial aid eligibility.

## Updating Data and Making Corrections

If discrepancies are identified during verification or the resolution of C-Codes, the institution will update the FAFSA through its Student Information System, via electronic transmission to the Department of Education's Federal Processing System. Students will be notified in writing via email or in person of any changes to their financial aid package.

## Exemptions from Verification

A student is excluded from verification if one of the following conditions applies:

### Death

- The student dies before completing the verification process.
- No further action is required to verify their eligibility.

### Incarceration

- The student is incarcerated at the time of verification.

### Certain Unsubsidized Aid Only

- The student is only eligible for and receiving **unsubsidized Title IV aid**, such as:
  - Direct Unsubsidized Loans
  - Direct PLUS Loans (Parent or Grad PLUS)
  - TEACH Grants
  - Iraq and Afghanistan Service Grants (IASG)

### Applicant Who is Not a Title IV Aid Recipient

- The student is not receiving any Title IV federal student aid for the award year.

### Late FAFSA Filing

- The student was selected for verification **after they are no longer enrolled** and are not seeking aid for a future term.

### Verified by Another Institution

- If the student completed verification for the same award year at another institution, and CSU has obtained a letter or ISIR showing the completed verification from the previous institution.

### Spousal or Parental Ineligibility

- When the spouse or parents of a dependent student are:
  - Deceased.
  - Mentally incapacitated.
  - Residing in a country where the documentation cannot be obtained.
  - Unable to be located despite reasonable attempts to contact them.

### Other Exceptions Related to Immigration or Citizenship

- For certain non-citizens, if the institution cannot reasonably obtain documentation required to

resolve the issue and if the resolution is not material to the student's eligibility.

## OIG Referrals

If throughout the completion of the verification process, the FA Office believes that the student/family reported information is questionable or they have reason to believe that the data is fraudulent, the DFA will review the file data and discuss the circumstances with institutional leadership. After the institution's review, a determination will be made as to whether the situation is conflicting information to be resolved by the student, or if a report should be made to the Office of Inspector General, Potential reportable offenses may include:

- False claims of independent student status
- False claims of citizenship
- Use of false identities
- Forgery of signatures or certifications
- False statements of income

**National Student Loan Data System Enrollment Reporting Policy  
Central State University  
Wilberforce, Ohio**

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Area of Responsibility: Office of Registrar  
Responsible Contact: Registrar  
Policy Identification: National Student Loan Data System Enrollment Reporting Policy  
Effective: Date (Last Approved): For Review

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## Background and Purpose

This policy details how Central State University confirms and reports the enrollment status of all current Title IV students, while addressing the students to be reported, the frequency and timing of reporting, and the validation and reconciliation of records to the National Student Loan Database System (NSLDS) via the National Student Clearinghouse (NSC). Timely and accurate reporting of student enrollment statuses is vital to maintaining compliance with certain Federal Title IV requirements. The university must confirm and report the enrollment status of all Title IV students, while maintaining all related documentation.

## NSC as Enrollment Reporting Servicer

Central State University contracts with the National Student Clearinghouse (NSC) to assist with the workload of reporting and staying in compliance with enrollment reporting requirements. The NSC is a free enrollment reporting service commonly used by many Title IV schools throughout the United States. Even though the university contracts with the NSC for enrollment reporting, the university is still ultimately responsible for the timely, accurate and complete responses to the Enrollment Reporting Roster files from NSLDS, while also maintaining all pertinent documentation.

The university confirms and reports all student enrollments to the NSC. NSLDS sends the Enrollment Reporting roster files to the NSC, and the NSC will use the data file submitted by the university to complete the Enrollment Reporting file from NSLDS. If the NSC does not reply to the roster file within a timely manner, NSLDS will notify the university.

## Who is Reported?

All students, who are or were, enrolled in courses at the University for any semester (Fall, Spring and Summer) are reported.

## Reporting Schedule and Timing

Central State University submits the required enrollment information every 30 days during the fall and spring semesters and at the beginning and end of summer and each session (Fall/Spring/Summer I and Fall/Spring/Summer II). Reporting every 30 days ensures that any changes to enrollment, such as changes to enrollment statuses within the semester and withdrawn statuses, are reported in a timely manner. These statuses must be reported within 30 days of when the university first becomes aware of the status change. Central State University reports undergraduate and graduate records as separate files.

Graduation reporting is completed within 30 days of the last day of each semester (January, June and September). Graduation reporting is submitted as a separate file, notating the special status of (G). The date reported is the last date of the semester, which should coincide with the graduation date on the official grade transcript. This is the conferral date and not the commencement date.

Schools have 15 days to respond to an NSLDS enrollment reporting roster. Central State University reports all enrollment to the NSC. The NSC will complete the response within 15 days. Once the NSC submits the response, NSLDS will send an error report back to the NSC. The NSC will then send Central State University an Error Response File, which must be resolved by the university within 10 days. The Registrar will submit the resolved records and notify the Office of Academic Affairs when completed.

## Data Required to be Reported

Central State University's BANNER information system stores all the student enrollment data required to be reported.

1. Student demographic information – name, DOB, SSN, address, email address and phone number.
2. Campus and location –student's primary location (OPEID **003026**).
3. Programs – all programs each student is enrolled in, whether they are Title IV aid eligible or not.
  - a. Students enrolled in continuing education only require campus-level reporting and no program.
  - b. Changes to a student's program must be reported (withdrawal, graduation, and enrollment status changes).
4. Campus-level enrollment data – certification date, enrollment status, enrollment effective date, anticipated completion date, and term begin/end date.
5. Program-level enrollment data – CIP code, CIP year, credential level, published program length measurement, published program length, weeks in the Title IV academic year, program begin date, special program indicator, program enrollment status, and program enrollment effective date.
6. Specific fields –
  - a. Program indicator – Students enrolled in a program of study must have a Program-level enrollment reported, regardless if the program is eligible for federal student aid or not. The program indicator is under the Campus-level Record type and indicates if the student is enrolled in a program.
  - b. Effective dates, certification dates, and received dates –
    - i. Enrollment Status Effective Date: the date the current enrollment status reported for a student was first effective. This date only updates when a student's enrollment status changes. If a student stays continuously enrolled at the same enrollment status, the Effective Date stays the same. The Effective Date, and the related enrollment status, must be reported for both the Campus level and the Program level.
    - ii. Certification Date: the date Central State University certifies the enrollment information. Normally, this is the date the enrollment report is generated.

- iii. Received Date: the date NSLDS accepts and loads Central State University’s enrollment information in NSLDS.
- c. Withdrawal versus Graduation effective dates – a student can be reported as withdrawn and then later reported as graduated. Sometimes a student may stop out, and you will not know they graduated until a later date. In this case, once the student is determined to be graduated, Central State University must update the Campus-level and/or Program-level with a ‘G’ status.
- d. Graduation and anticipated completion dates – besides reporting a student’s graduated status date, anticipated completion dates are also required. It is important to report the anticipated completion date which is accurate as possible in order to assist in the correct servicing of the student’s loans. Misreporting the anticipated completion date could result in a student’s loan converting to repayment too early or too late.
- e. Enrollment statuses (Campus-level and Program-level) -

‘F’	Full-time	‘G’	Graduated
‘Q’	Three-quarter time	‘W’	Withdrawn
‘H’	Half-time	‘D’	Deceased
‘L’	Less than half-time	‘X’	Never attended
‘A’	Leave of absence	‘Z’	Record not found

## Validation of Enrollment Data

The university Registrar is the custodian of all student data within Central State University’s Banner information system. They enter and validate all enrollment status changes, including the review and reconciliation of data provided by faculty and other academic staff. They must resolve all errors or exceptions in the university’s Banner information system, to ensure accurate reporting to NSLDS. The Director of Financial Aid also reviews student withdrawal dates, in accordance with Return of Title IV requirements. The Registrar relies on accurate information from multiple sources at the University (admissions, academic departments, financial aid, etc.).

Refer to Step 1 of the *National Student Clearinghouse Processing Procedure* for step-by-step procedures on gathering and validating data.

## Resolving Errors

Occasionally there may be instances where data needs to be updated in NSLDS directly for a student or group of students. The most efficient way to update individual students is via the NSC.

1. Login to the NSC website – [studentclearinghouse.org](http://studentclearinghouse.org)
2. Click on the Student Look-up tab.
3. Enter the student’s identifying information and click Search.
4. Under the Enrollment History, there is an “Update Student Record” link – if there is a current enrollment file being processed, you have to wait until it’s completed before updating a student.
5. Update the student’s information and Save/Submit.

The student’s updated information will be submitted to NSLDS. If student information is directly updated in NSLDS, it can create conflicting information between the NSC and NSLDS.



## Other Resources

NSLDS Enrollment Reporting Guide (November 2022):

<https://fsapartners.ed.gov/sites/default/files/2022-11/NSLDSEnrollmentReportingGuideNovember2022.pdf>

NSLDS Enrollment Reporting Guide (November 2022) Appendices:

<https://fsapartners.ed.gov/sites/default/files/2022-11/NSLDSEnrollmentReportingGuideAppendicesNovember2022.pdf>

**Direct Loan Entrance and Exit Counseling Policy**  
**Central State University**  
**Wilberforce, OH**

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Area of Responsibility:	Office of Financial Aid
Responsible Contact:	Director of Financial Aid
Policy Identification:	Direct Loan Entrance and Exit Counseling Policy
Effective Date (Last Approved):	For Review

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## Background and Purpose:

The purpose of this policy is to ensure compliance with federal regulations and to provide students with the information needed to make informed decisions about borrowing and repaying Federal Student Loans. Central State University is committed to ensuring that all students who receive Direct Student Loans (subsidized and unsubsidized) fully understand their rights and responsibilities related to borrowing. In accordance with the U.S. Department of Education regulations, students must complete both **Entrance Counseling** before receiving their first loan disbursement, and **Exit Counseling** upon graduation, withdrawal, or less-than-half-time enrollment.

## Scope

This policy applies to all Direct Loan Borrowers

## Entrance Counseling:

- 1. Eligibility and Notification:**
  - All first-time borrowers of Direct Student Loans must complete **Entrance Counseling** before the first disbursement of their loan funds.
  - The Financial Aid Office will notify students who are required to complete Entrance Counseling via their official student email address, personal email address and/or the CSU student portal outlining the steps for completion.
- 2. Process for Completion:**
  - Students must complete **Entrance Counseling** through the Federal Student Aid website (<https://studentaid.gov>).
  - The counseling session provides information about the loan terms, borrower responsibilities, and repayment options.
  - The session must be completed in full for the loan disbursement to be processed.
  - Once completed, the system will automatically notify the CSU Office of Financial Aid that the student has met the requirement.
- 3. Tracking Completion:**
  - The Financial Aid Office will track the completion status of each student through the Banner SIS system and by viewing related records on Department of Education websites. Entrance Counseling responses are uploaded to Banner SIS daily or upon receipt from the U.S Department of Education, after which student document tracking is updated accordingly.

- Students will be flagged as incomplete if they have not finished Entrance Counseling by the time of the scheduled loan disbursement.
- If a student has not completed Entrance Counseling, their loan funds will not be disbursed until the requirement is met.

## Procedure for Exit Counseling:

1. **Eligibility and Notification:**
  - All students who have received Direct Student Loans and who are graduating, withdrawing, or dropping below half-time enrollment must complete **Exit Counseling**.
  - The Financial Aid Office will notify students of the requirement to complete Exit Counseling via their official student email address and/or the CSU student portal at least 30 days prior to their last day of enrollment or upon notification of graduation/withdrawal.
2. **Process for Completion:**
  - Students must complete **Exit Counseling** through the Federal Student Aid website (<https://studentaid.gov>).
  - The counseling session provides information about loan repayment options, grace periods, deferment, forbearance, and consolidation.
3. **Tracking Completion:**
  - The Office of Financial Aid will track the completion status of Exit Counseling for all students subject to this requirement. Exit Counseling responses are uploaded to Banner SIS daily or upon receipt from the U.S Department of Education, after which student document tracking is updated accordingly.
4. **Failure to Complete Exit Counseling:**
  - If a student fails to complete Exit Counseling, Exit Counseling materials will be mailed to their last known address and documented in their Financial Aid file for audit purposes.

## Responsibilities:

- **Students:**
  - Complete both **Entrance Counseling** (before the first loan disbursement) and **Exit Counseling** (upon graduation, withdrawal, or dropping below half-time enrollment) in a timely manner.
  - Ensure all required information is provided during the counseling sessions.
- **Office of Financial Aid:**
  - Ensure students are notified of the requirements for Entrance and Exit Counseling.
  - Track the completion of counseling sessions for all eligible students.
  - Notify students of any incomplete requirements to ensure loan disbursements or graduation are not delayed.
  - Maintain records of completed counseling sessions.

Central State University will take all necessary steps to ensure that students meet the regulatory requirements as set forth by the U.S. Department of Education.

**Admissions Policy – Verification of High School Completion**  
**Central State University**  
**Wilberforce, Ohio**

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Area of Responsibility:	Office of Admissions
Responsible Contact:	Director of Admissions
Policy Identification:	Admissions Policy – Verification of High School Completion
Effective: Date (Last Approved):	For Review

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## Background and Purpose

The purpose of this policy is to ensure that Central State University complies with federal regulations regarding student admissions eligibility as outlined in 34 CFR § 600.4. This policy establishes the criteria for admitting students as regular students in an eligible program and aligns with federal and state requirements. Central State University is a nonprofit institution of higher education that admits as regular students only individuals who meet at least one of the following criteria:

1. Possess a high school diploma.
2. Have the recognized equivalent of a high school diploma (e.g., General Education Development (GED) certificate, state-recognized high school equivalency credential, or completion of a secondary school education in a homeschool setting that is treated as a homeschool under state law).

Central State University Admission’s policy states that CSU reserves the right to evaluate the validity of a student’s high school completion if the institution or the Secretary has reason to believe that the high school transcript, diploma or equivalency document is not valid or was not obtained from an entity that provides secondary school education.

## Scope

This policy applies to all applicants for Admission to Central State University.

## Verification of High School Completion

1. Applicants for Admission must submit proof of high school completion, which may include:
  - An official high school transcript indicating graduation date.
  - Official documentation of a recognized high school equivalency credential (e.g., GED, HiSET, TASC).
2. Admissions personnel will verify the authenticity of submitted documents.
  - If documentation cannot be verified, the student must provide additional proof, or the application may be denied.
3. Unofficial transcripts will not be considered a means of verifying high school completion.

## Evaluating the Validity of High School Transcripts

- a. Transcripts are only deemed official if they are sent by one of the following:
  - i. Parchment.com (electronic delivery)
  - ii. National Student Clearinghouse (electronic delivery)
  - iii. Common App or Common Black College App (electronic delivery)
  - iv. Emailed to [admissions@centralstate.edu](mailto:admissions@centralstate.edu) directly from a school official with a verified school email address.
  - v. Delivered to Central State University Admissions Department in a sealed envelope, generated by the sending institution.

## Receiving Official High School Transcript

- I. Upon submission of an admissions application, and prior to application materials being reviewed for an admissions decision, applicants are required to submit an official high school transcript or equivalent proof of completion.
- II. The CRM (SLATE) auto-creates a checklist item of “Official High School Transcript” for applicants who indicate they are a first-time student. Applicants who have this outstanding checklist item are sent bi-weekly reminders, with instructions for submitting/requesting their official high school transcript.
- III. Applications will not be reviewed for a decision until an official transcript is received and attached to the student record in the Slate CRM.
- IV. Students without an Official High School transcript are identified in the SIS as “non-complete”, which in turn, prompts the Financial Aid Office to exclude them from disbursement activities. When the student submits an acceptable transcript, the student is then eligible for Financial Aid. The Financial Aid Office will continuously run system generated reports to identify newly eligible students.

Students who are admitted prior to their high school graduation are required to submit an updated Final Official High School Transcript to include graduation date and proof of maintaining 2.2 cumulative GPA throughout their senior year.

- I. Admission decisions for these students are communicated as “provisional until we receive the official final transcript satisfying our admission requirement of an unweighted GPA of at least 2.2, along with the graduation date, as outlined in the acceptance letter.
  - i. The CRM auto-creates a checklist item of “Official Final High School Transcript” for applicants admitted prior to high school graduation.
  - ii. Regular communications are sent via the CRM until this checklist item is satisfied.
  - iii. Admissions Recruiters maintain a caseload of assigned students, working to ensure that final official transcripts are received prior to the start of the semester. Once received, the recruiter will mark the checklist item as satisfied on the applicant record within the CRM.
  - iv. Confirmed students who do not submit a final official transcript by a pre-determined deadline (deadline is prior to the semester start date) are deemed ineligible to proceed as an enrolled student. A report of these students is generated from the CRM and provided to the Office of the Registrar who completes the task of dropping students from classes.

This policy ensures that Central State University complies with regulatory requirements while upholding fair and transparent admissions practices.