



Policies & Procedures Manual

2023-2024 Award Year

The Office of Financial Aid Services
5-17-2023

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SECTION 1: MANUAL INTRODUCTION

The purpose of this manual is to provide Connecticut State Community College (CT State) financial aid staff with the financial aid policies and procedures required to administer all sources of financial aid both compliantly and effectively. The policies and procedures within this document are in alignment with the mission and objectives of the institution, as well as the Connecticut State Colleges & Universities system, and its governing board, the Connecticut Board of Regents for Higher Education.

This document may also serve as a resource in both compliance audits and federal program reviews.

1.1 INTRODUCTION TO THE FINANCIAL AID OFFICE

CT State is a large, complex institution with multiple locations throughout the State of Connecticut. The Office of Financial Aid Services operates mainly out of a central office and 12 campus locations.

CONNECTICUT STATE COMMUNITY COLLEGE

Website: <https://ctstate.edu>
Financial Aid Office Website: <https://ctstate.edu/financial-aid>
Financial Aid Office Email: CTState-FinancialAidStaff@ct.edu

OPEID: 007635-00
Federal School Code: 007635
Grantee UEI: V9HAESFBZHD4
TIN: 30-1342540

OFFICIALS

Dr. O. John Maduko	President
Kerry Kelley	Vice President of Finance and Administration
Steven J. McDowell	Associate VP for Financial Aid Services & Title IV Compliance

US DEPARTMENT OF EDUCATION EMERGENCY CONTACT

Name: Steven J. McDowell
Title: Associate VP for Financial Aid Services & Title IV Compliance
Phone: 860-612-7030
Email: mcdowells@ct.edu

CENTRAL OFFICE

Address: 185 Main Street, New Britain, CT 06051

Central Office Email: BOR-FinAid@ct.edu

Campus Staff Help Email: BannerFinAidHelp@commnet.edu

Documentation Website: <https://www.commnet.edu/finaid>

STAFF

Steven J. McDowell	Associate VP for Financial Aid Services & Title IV Compliance
Shana Saccullo	Director of Financial Aid Operations & Compliance
Susie Medeiros	Associate Director of Financial Aid Systems
Bryan Lewis	Associate Director of Non-Federal Programs
Lisa Boyko	Associate Director of Federal Programs
Margaret Malaspina	Regional Director of Financial Aid Operations & Outreach
Irene Martin	Regional Director of Financial Aid Operations & Outreach
Omar Livingston	Regional Director of Financial Aid Operations & Outreach
Beth-Anne Egan	Director of Veterans Affairs/Chief Certifying Official

Below is a listing of each campus location.

Note: OPEID branch codes will be updated once affirmed by the US Department of Education; additional changes pending for Quinebaug's Main Street location and Cybulski Community Reintegration Center.

ASNUNTUCK CAMPUS

OPEID:	007635-	Monica Kedzior	Campus Supervisor
Address:	170 Elm Street, Enfield, CT 06082	Alicia St. Peter	Financial Aid Specialist
Phone:	860-253-3030	Monica Charubin	Financial Aid Assistant
Fax:	860-253-3029		
Email:	AS-FinAid@asnuntuck.edu		

CAPITAL CAMPUS

OPEID:	007635-00	Jose Velez-Otero	Campus Supervisor
Address:	950 Main Street, Hartford, CT 06103	Aleidy Dominguez-Jorge	Financial Aid Specialist
Phone:	860-906-5090	Kendra Lee	Financial Aid Specialist
Fax:	860-906-5092	Douglas Haddad	Financial Aid Specialist
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GATEWAY CAMPUS

OPEID:	007635-	Ryan Jones	Campus Supervisor
Address:	20 Church Street, New Haven, CT 06510	Amy Poskus	Financial Aid Specialist II
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Fax:	203-285-2036	Jennifer Vorel	Financial Aid Specialist
Email:	GW-FinAidHelp@gatewayct.edu		

HOUSATONIC CAMPUS

OPEID:	007635-		
Address:	500 Lafayette Blvd, Bridgeport, CT 06604	Mirjeta Murati	Campus Supervisor
Phone:	203-332-5047	Erika DeJesus	Financial Aid Specialist
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Email:	HC-FinAid@hcc.commnet.edu	Jessica Griffin	Financial Aid Specialist

MANCHESTER CAMPUS

OPEID:	007635-	Anna Torres	Campus Supervisor
Address:	Great Path, Manchester, CT 06045	Yanidza Betancourt	Financial Aid Specialist II
Phone:	860-512-3380	Elizabeth Gregonis	Financial Aid Specialist
Fax:	860-512-3381	Paula Arango	Financial Aid Specialist
Email:	MA-FinAid@manchestercc.edu	Katherine Player	Financial Aid Specialist

MIDDLESEX CAMPUS

OPEID:	007635-		
Address:	100 Training Hill Rd, Middletown, CT 06457	Julia Harding	Campus Supervisor
Phone:	860-343-5741	Michael Amouzou	Financial Aid Specialist II
Fax:	860-343-3014	Lora Wymer	Secretary II
Email:	MX-FinancialAid@mxcc.edu		

NAUGATUCK VALLEY CAMPUS

OPEID:	007635-	Catherine Hardy	Campus Supervisor
Address:	750 Chase Pkwy, Waterbury, CT 06708	Jennifer Camera	Financial Aid Specialist
Phone:	203-575-8284	Johanis Ayala	Financial Aid Specialist
Fax:	203-575-8157	Brenda Perez	Financial Aid Specialist
Email:	NV-FinAid#@nv.edu		

NORTHWESTERN CT CAMPUS

OPEID:	007635-		
Address:	Park Place East, Winsted, CT 06098	Daniel Roberts	Campus Supervisor
Phone:	860-738-6329	Jacqueline Boyce	Financial Aid Specialist
Fax:	860-738-6437	Kiersten Balboni	Financial Aid Assistant
Email:	NW-FinAid@nwcc.edu		

NORWALK CAMPUS

OPEID:	007635-	Fany Stubbs	Campus Supervisor
Address:	188 Richards Avenue, Norwalk, CT 06854	Jessica Peralta Ramos	Financial Aid Specialist
Phone:	203-857-7023	Javier Figueroa	Financial Aid Specialist
Fax:	203-857-7310	Cindy Shiwgobin	Financial Aid Assistant
Email:	NK-FinAid@norwalk.edu		

QUINEBAUG VALLEY CAMPUS

OPEID:	007635-	Logan Tashea	Campus Supervisor
Address:	742 Upper Maple St, Danielson, CT 06237	Philhemina Boone	Financial Aid Specialist
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Fax:	860-932-5753		
Email:	QV-FinAid@qvcc.commnet.edu		

THREE RIVERS CAMPUS

OPEID:	007635-	Hong-Yu Kovic	Campus Supervisor
Address:	574 New London Tpke, Norwich, CT 06360	Rashita Parker	Financial Aid Specialist II
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Fax:		Sara Pearson	Financial Aid Specialist
Email:	FinancialAidHelp@threerivers.edu		

TUNXIS CAMPUS

OPEID:	007635-		
Address:	271 Scott Swamp Rd, Farmington, CT 06032	Sandra Vitale	Campus Supervisor
Phone:	860-773-1422	Giancarlo Carbone	Financial Aid Specialist II
Fax:	860-676-8906	Amanda Crowley	Financial Aid Specialist
Email:	TX-FinAid@tunxis.edu	Maline Lekram	Financial Aid Specialist

ADDITIONAL LOCATIONS

MacDougall-Walker Correctional Institution
1153 East South Street
Suffield, CT 06078
OPEID: 007635-

Gateway-North Haven Campus
88 Bassett Road
North Haven, CT 06473
OPEID: 007635-

Osborn Correctional Institution
335 Bilton Road
Somers, CT 06071
OPEID: 007635-

Naugatuck Valley-Danbury Campus
190 Main Street
Danbury, CT 06810
OPEID: 007635-

Robinson Correctional Institution
285 Shaker Road
Enfield, CT 06082
OPEID: 007635-

Quinebaug Valley-Windham Technical HS
210 Birch Street
Willimantic, CT 06226
OPEID: 007635-

Willard Cybulski Correctional Institution
391 Shaker Road
Enfield, CT 06082
OPEID: 007635-

Brooklyn Correctional Institution
59 Hartford Road
Brooklyn, CT 06234
OPEID: 007635-

Corrigan-Radgowski Correctional Center
986 Norwich-New London Turnpike
Uncasville, CT 06382
OPEID: 007635-

York Correctional Institution
201 West Main Street
Niantic, CT 06357
OPEID: 007635-



1.2 PURPOSE AND PHILOSOPHY OF THE FINANCIAL AID OFFICE

To support the education achievement of our students, CT State awards financial aid funds from available resources to promote access to higher education, facilitate completion, enable personal and professional growth, and ultimately contribute to the economic prosperity of the State of Connecticut.

The financial aid operation at CT State is a centralized, enrollment management model. There exists a central office staff to focus on aid strategy, operations, aid delivery, and compliance, and campus-based staff to meet directly with students in the application and awarding of all available sources and types of financial aid. Due to the expansive size of CT State, our organizational structure provides for three regional-based staff to assist with operations, outreach activities, and campus management. The regions are divided as follows:

- Region 1: Gateway, Housatonic, and Norwalk campuses
- Region 2: Asnuntuck, Naugatuck Valley, Northwestern Connecticut, and Tunxis campuses
- Region 3: Capital, Manchester, Middlesex, Quinebaug Valley, and Three Rivers campuses

Veterans Affairs is also managed by the Office of Financial Aid Services. This is demonstrated using a chief certifying official, with additional certifying officials placed within each campus to assure that veterans have access to their benefits to attend CT State.

POLICIES

The BOR is responsible for approving certain policies for CT State. All BOR policies may be referenced at <https://www.ct.edu/regents/policies>. Relevant financial aid policies include:

- [Satisfactory Academic Progress for Financial Aid Recipients](#)
- [Financial Aid Policy, Philosophy, and Code of Conduct](#)

1.3 POLICIES AND PROCEDURES - DEVELOPMENT RESPONSIBILITIES

This centralized manual was initiated during the Fall of 2020 and is updated annually for the prospective award year. Updates to the manual throughout the year are incorporated, as needed, by central office staff.

All major changes are reviewed and approved by the Associate Vice President for Financial Aid Services & Title IV Compliance, with input from relevant staff members and departments to ensure that the needs of all student populations have been considered.

1.3.1 RESPONSIBLE PERSONNEL

Other offices who may participate in the development and/or implementation of financial aid policies and procedures on a regular basis may include, but are not limited to the following areas:

- President's Cabinet
- Bursar
- Finance/Accounting
- Registrar/Enrollment Services
- Admissions
- Advising

Use of existing distribution lists inclusive of offices above will be utilized to disseminate information, as appropriate.

1.3.2 DOCUMENTS AND METHODS

The central office is accountable for ensuring the college has complete and compliant financial aid policies and procedures. Therefore, the central office is responsible for ensuring that its staff remains current with Title IV and state law, and all regulations within, through rigorous training.

This is accomplished through professional memberships and participation in learning activities, training sessions, webinars, meetings, and professional conferences that include the following sources:

- US Department of Education/Federal Student Aid (ED/FSA)
- National Association of Student Financial Aid Administrators (NASFAA)
- Eastern Association of Student Financial Aid Administrators (EASFAA)
- Connecticut Association of Professional Financial Aid Administrators (CAPFAA)
- American Association of Collegiate Registrars and Admissions Officers (AACRAO)

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

1.4 IMPLICIT BIAS AWARENESS & INDIVIDUAL DEVELOPMENT POLICY

CT State maintains a commitment to diversity, equity, and inclusion among the student population, but also among faculty, staff, and administrators. This is evidenced through our Notice of Nondiscrimination:

Connecticut State Community College does not discriminate on the basis of race, color, religious creed, age, sex, national origin, marital status, ancestry, present or past history of mental disorder, learning disability or physical disability, sexual orientation, gender identity or expression, veteran status, criminal record, genetic information or any other federal or state protected class in its employment, programs, and activities.

This effort is championed in CT State through the position of Vice President of Diversity, Equity, and Inclusion.

John-Paul Chaisson-Cardenas, PhD, MSW
Vice President of Diversity, Equity, and Inclusion
[Jchaisson-cardenas@commnet.edu](mailto:jchaisson-cardenas@commnet.edu)
860-612-7056

CSCU additionally requires all management/confidential employees to participate in Diversity, Equity, and Inclusion Training with the goal of enhancing the system's DEI strategy, tactics, policies, approaches, and resources across CSCU for academic affairs, student affairs, enrollment management, and finance. Topical information includes a discussion of relevant laws, civil rights, free speech, whistleblower, retaliation, ethics, race, sex, orientation, searches, and investigations. This training also assists in the understanding of microaggressions and implicit bias, as well as discussing an equity mindset relative to leadership, affinity spaces, intersectionality, presence, belonging, inclusivity, and oppression using past research.

As a financial aid office, we understand that implicit biases exist naturally. Therefore, we seek to provide our staff with the ability to recognize and understand their own potential biases through self-examination using the Harvard [Project Implicit](#) Bias Test. We do not award financial assistance to students based on any area that may constitute discrimination toward our financial aid applicants. As such, we treat all students equally and on a first come, first served fund-available basis.

SECTION 2: ADMINISTRATIVE ORGANIZATION AND OFFICE MANAGEMENT

CT State is held under the purview of the Connecticut Board of Regents for Higher Education (BOR) under the Connecticut State Colleges & Universities (CSCU) system, which governs the following schools:

- Central Connecticut State University
- Charter Oak State College
- Connecticut State Community College
- Eastern Connecticut State University
- Southern Connecticut State University
- Western Connecticut State University

HISTORY OF THE CONNECTICUT BOARD OF REGENTS FOR HIGHER EDUCATION

Pursuant to Subsection (a) of Section 211 of Public Act 11-48, the BOR's assumption of licensing and accrediting duties, and providing of postsecondary education programs was effective on July 1, 2011. That year, the three previously separate Board of the Connecticut State University System, the Community-Technical College System, and Charter Oak State College were consolidated into one system with a single Board of Regents for Higher Education (BOR). Prior to the establishment of the BOR, the former State Department of Higher Education, which was overseen by the Connecticut Board of governors for Higher Education (BOGHE), was the sole body tasked with monitoring compliance with CT regulations for licensure and accreditation of institutions and programs of higher learning. The BOGHE ceased to operate on July 1, 2011. Its successor organization is the BOR, which is the governing board for CSCU. The duties, operation, and authority of the BOR, including accreditation and licensing authority, are prescribed within the Connecticut General Statutes, Title 10a-6, Duties of the Board of Regents for Higher Education.

While the BOGHE ceased to exist on July 1, 2011, the legacy Boards continued until December 31, 2011. That transition period included in the enabling legislation (Public Act 11-48) required the three legacy boards to remain in office from July 1, 2011, until December 31, 2011, in order to facilitate the transition of duties and responsibilities to the BOR. However, the three legacy boards could not take any action after July 1, 2011, unless it was ratified by the BOR.

On January 1, 2012, the BOR is also authorized to act, as necessary, as the Board of Trustees for the Community-Technical Colleges, the Board of Trustees for the Connecticut State University System, and the Board for State Academic Awards (which is the board for Charter Oak State College) pursuant to sections 10a-71, 10a-88, and 10a-143 of the Connecticut General Statutes, as amended. The specific powers and duties of the Board are prescribed in Title 10a of the Connecticut General Statutes and are further delineated in policies adopted by the Board from time to time.

The BOR has 21 members consisting of 15 voting members (nine appointed by the Governor, four by legislative leaders, and two by students) and six non-voting ex-officio members, including two representatives from the Faculty Advisory Committee. Administration, oversight, support, and coordination of CSCU are carried out through the President of CSCU and the System Office. A documented history of the BOR and its membership is located at <https://www.ct.edu/regents>.

The BOR studies and considers the needs of Connecticut's residents and industry, and established strategies to achieve them; sets statewide tuition and student fee policies; establishes financial aid policies; reviews, licenses, and accredits academic programs; and, in collaboration with institutional stakeholders, conducts searches for and selects campus leadership. In addition to governance responsibilities, the BOR also holds broad responsibilities for development and coordination of higher education policy across our institutions.

A single administrative system office was created to provide overall support, promote collaboration, improve transfer among institutions, and achieve administrative efficiencies and financial opportunities. Being a single system has allowed CSCU to leverage their collective talent to ensure the continued access, affordability, and student success that their institutions deliver.

FORMULATION OF CONNECTICUT STATE COMMUNITY COLLEGE

Previously, there existed 12 independent community colleges within the CSCU system. In April 2017, at the request of the BOR, the CSCU president outlined the students first initiative, which proposed two strategies to address these structural concerns. The charge from the BOR was to focus on fostering student success and long-term sustainability of the system. This called for consolidating the 12 community colleges into one singly accredited institution. Rather than closing campuses and limiting access, the first strategy focused on finding administrative savings. The second proposed system wide consolidation of administrative back-office functions, which began in Spring 2019. In addition, a work group was convened to outline a plan for the consolidated Community College. The plan calls for a singly accredited college with 12 campuses, a consolidated organizational structure, and integrated administrative motions. The target effective date for the single college structure is Fall 2023.

In June 2018, the BOR approved a plan to regionalize their Community College system and to align curriculum over a longer time. Before seeking a single accreditation in 2023. In 2019, CSCU began to regionalize the Community College system and prepare for a singly accredited Community College by creating a new leadership structure. CSCU continues to reduce management costs, protect and improve student services, contain tuition, and preserve locations as they move forward towards a single Community College model with multiple campus locations.

The target date for the completion of this merger of all 12 community colleges into Connecticut State Community College is July 1, 2023, for the 2023-2024 award year. The most recent information on the state of the merger, as well as organizational updates, may be found at <https://www.ct.edu/merger>.

CONNECTICUT STATE COLLEGES & UNIVERSITIES: MISSION STATEMENT

The Connecticut State Colleges & Universities contribute to the creation of knowledge and the economic growth of the state of Connecticut by providing affordable, innovative, and rigorous programs. CSCU's learning environments transform students and enable over 140,000 Connecticut residents annually to pursue their personal and career goals. CSCU has five goals that focus on access, affordability, student success, innovation and economic growth, and equity.

The mission of CSCU is located at <https://www.ct.edu/regents/mission>.

2.1 INSTITUTIONAL AND DIVISIONAL STRUCTURE

CT State is led by the position of President and is accompanied by a supporting [Cabinet](#). Under the direction of the Cabinet, CT State provides the following public documents regarding our strategic plan, academic catalog, and student handbook.

Strategic Plan (Draft):	https://www.ct.edu/files/pdfs/CT-State-Strategic-Plan.pdf .
2023-34 Academic Catalog (Draft):	http://ct.catalog.acalog.com/index.php?catoid=2
Student Handbook (Draft):	https://ctstate.edu/images/Student_Handbook_presentation.pdf

Note: Draft document links will be updated when final.

CT State is seeking accreditation through NECHE, which satisfies the US Department of Education's accreditation requirement of the institution to provide Title IV funding to eligible students. The institution also works with the following accreditors/certifying agencies for specialized programs:

- Accreditation Board for Engineering and Technology
- Accreditation Commission for Education in Nursing, Connecticut State Board of Examiners for Nursing

- Accreditation Counsel for Education in Nutrition and Dietetics
- Accreditation Counsel for Occupational Therapy Education
- Accrediting Bureau of Health Education Schools
- American Bar Association
- American Culinary Federation Education Foundation Accrediting Commission
- American Health Information Management Association Professional Certificate Approval Program
- American Library Association - Allied Professional Association
- American Veterinary Medical Association, Committee on Veterinary Technician Education and Activities
- American Welding Association
- Association of Collegiate Business Schools and Programs
- Commission on Accreditation for Health Informatics and Information Management Education
- Commission on Accreditation in Physical Therapy Education
- Commission on Accreditation of Allied Health Education Programs, Accreditation Review Council on Education in Surgical Technology and Surgical Assisting
- Commission on Accreditation of Allied Health Education Programs, Committee on Accreditation of Educational Programs for the Emergency Medical Services Professions
- Commission on Accreditation of Allied Health Education Programs, Joint Review Committee on Diagnostic Medical Sonography
- Commission on Accreditation of Allied Health Education Programs, Medical Assisting Education Review Board
- Commission on Dental Accreditation/American Dental Association
- Commission on Opticianry Accreditation
- Committee on Accreditation for Respiratory Care
- Fire and Emergency Services Higher Education
- ISO 9001-2015 Manufacturing Certification
- Joint Review Committee on Education in Radiologic Technology
- Joint Review Committee on Nuclear Medicine Technology
- National Association for the Education of Young Children
- National Association of Schools of Music
- National Automotive Technician Education Foundation, Automotive Service Excellence Education Foundation
- The National Institute for Metalworking Skills

CONNECTICUT STATE COMMUNITY COLLEGE: MISSION STATEMENT

Connecticut State Community College provides access to academically rigorous and innovative education and training focused on student success. The college supports excellence in teaching and learning, makes data informed decisions, promotes equity, and advances positive change for the students, communities, and industries it serves.

CONNECTICUT STATE COMMUNITY COLLEGE: VISION STATEMENT

Connecticut State Community College will be recognized for exceptional student success, educational leadership, and transformative collaboration with business and industry, government, educational, and key stakeholders while advancing diverse opportunities for Connecticut's citizens and communities.

DIVISIONAL STRUCTURE

The Office of Financial Aid Services reports up through the Office of Enrollment Management. The Associate Vice President for Financial Aid Services & Title IV Compliance reports to the Vice President of Enrollment Management, who reports directly to the President.

The financial aid offices at each CT State campus location are staffed by qualified personnel and all utilize the same instance of administrative procedures for the Federal Student Aid (FSA) programs, including an adequate system of internal checks and balances. Both the institutional organization and the system setup separates the functions of authorizing payment and disbursing or delivering funds so that no single person or office exercises both functions for any student receiving FSA funds.

CT STATE CENTRAL OFFICE PRIMARY RESPONSIBILITIES:

This office is part of the Office of Enrollment Management within the CT State structure as the leader in strategy and compliance for the college related to Title IV administration. Its mission is to provide the colleges, students, and their families with leadership and direction in all areas of financial aid administration to increase opportunities for student access and success in higher education through:

- Policy Analysis, Research, and Development
- Federal and State Compliance
- Strategy and Operations
- Financial Aid Program Management
- Information System Management
- Staff Training

CAMPUS FINANCIAL AID OFFICES PRIMARY RESPONSIBILITIES:

To support the educational achievement of CT State students, the Financial Aid Office awards funds from available resources to promote access to higher education, facilitate completion, enable personal and professional growth, and ultimately contribute to the economic prosperity of the State of Connecticut. To demonstrate this commitment, our campus aid offices:

- Administer aid compliant with federal and state laws and regulations and with institutional policy and procedure.
- Provide financial access to the college for as many eligible students as current funding will allow.
- Assist students in meeting the direct costs of tuition, fees, books, and supplies, as well as assisting students in funding indirect costs such as room, board, personal, and transportation expenses.
- Offer guidance to students, families, and campus staff related to financial aid administration.
- Execute functions such as verification, loan processing, awarding/packaging aid, and executing the policies and procedures within this manual.
- Analyze the effectiveness and efficiency of the financial aid delivery system, including the Financial Aid Office, the Finance/Bursar's Office and other campus departments/offices.
- Participate actively in events, programs, activities related to enrollment to impact outreach, retention, and graduation.
- Work collaboratively with all relevant offices, staff, and faculty in supporting the enrollment goals of the college.

FINANCE OFFICE RESPONSIBILITIES:

The Finance Department develops and implements fiscal and administrative policy, and provides professional advice, fiscal analysis, and recommendations to the Chief Financial Officer, the Board, and the colleges on matters related to sound financial planning, spending and revenue budgets, financial forecasts, fiscal modeling, and collective bargaining costs. The department manages and oversees accounting, financial reconciliation, fiscal

reporting, internal and external audits, and the development and implementation of the biennial operating budget and interface with the capital budget for the system and twelve colleges. Staff process all vendor A/P payments for the colleges and system; monitor all financial accounts, budgets, and financial condition for compliance with national accounting standards, budgetary and policy requirements and plans; direct the implementation and on-going maintenance of automated financial systems, system controls and user training and support; and provide system office financial and business office support functions.

The CT State Finance Office oversees the management of G5 and Title IV drawdowns in accordance with college disbursement and return activity.

BURSAR RESPONSIBILITIES:

Campus Bursars are responsible for student billing and revenue collection. In addition to collecting and posting payments on student's accounts, the Bursar Offices oversee payment plans, financial aid refunds, and the collection of past due tuition. The Bursar's Office also processes refunds from over payments, class withdrawals, college withdrawals, and status changes.

REGISTRAR RESPONSIBILITIES:

The Registrar must maintain student academic records, oversee registration for both credit and non-credit students, process enrollment verifications and transcripts, provide the final degree audit, and complete the end of term processing.

ADMISSIONS/ENROLLMENT SERVICES/TESTING PRIMARY RESPONSIBILITIES:

The college Admissions and Enrollment Services Offices provide and manage a full range of student recruitment, admissions, and enrollment services. The colleges have an extensive collaborative and cooperative relationship with a wide array of executive, academic, professional, and administrative people within the college and in the external environment, to have critically important contacts and relationships with school administrators, counselors, students, and parents and with key members of community organizations, service groups, churches, foundations, and local governments.

ACADEMIC ADVISING RESPONSIBILITIES:

Guided Pathways Advisors assist students with registering for the right courses, building a balanced schedule, and reviewing their academic plan. They also assist students in locating resources related to basic needs and mental health.

HUMAN RESOURCES RESPONSIBILITIES:

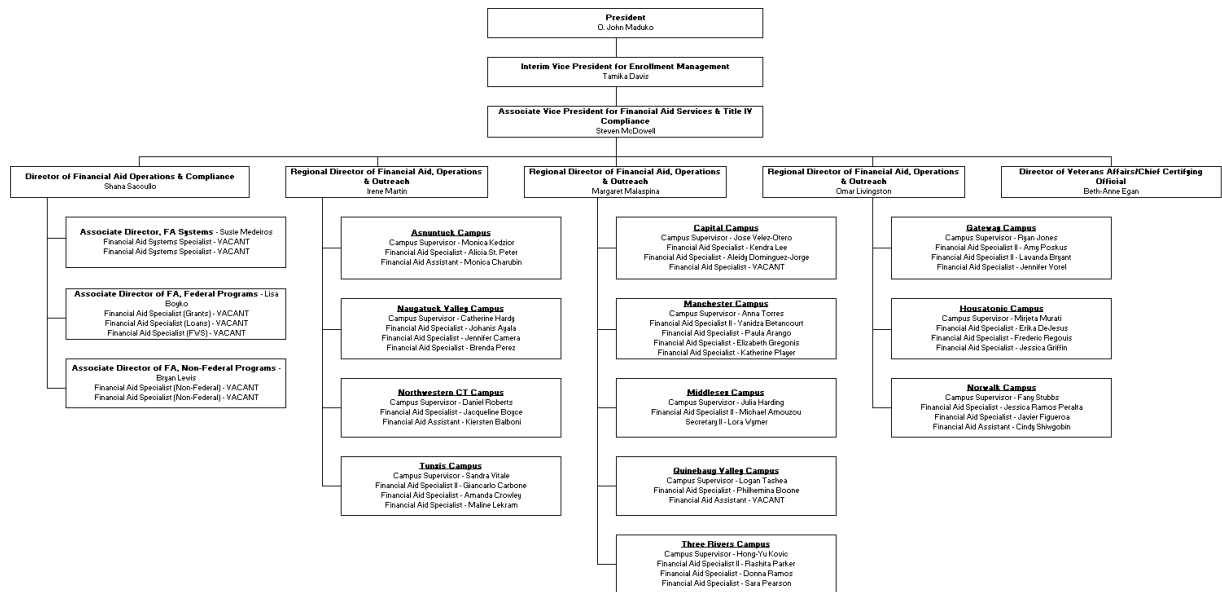
Through a shared services model, Human Resources process payroll for faculty, staff, administrators, and eligible student workers. This includes working with employee benefits, employment verification, background checks, job announcements, research for payroll/retirement purposes, contract payments, CORE administration, and union contract management.

DISABILITY SERVICES RESPONSIBILITIES:

Disability services specialists are housed at each campus to assist those students who require assistance under applicable state and federal laws.

2.2 FINANCIAL AID OFFICE STRUCTURE AND POSITION RESPONSIBILITIES

The Associate Vice President for Financial Aid Services & Title IV Compliance is responsible for the oversight of financial aid administration and veteran's affairs at CT State. An organizational chart is provided below.



Organization Chart as of May 12, 2023

Central office staff members or campus staff members have the authority for authorizing eligible disbursements, but only the staff in the Finance Office may post funds to each student account (disbursement). To validate, Banner (our student information system of record), separates these two functions. As advised by Ellucian, the system's student information system provider, only financial aid staff with awarding access may run the "disbursement" procedure in Banner to authorize disbursements, and only staff in the Finance and Bursar Office who have access to establishing detail codes may run the process to post financial aid payments to the student account.

In addition, the Banner system security set up has adequate controls to ensure that staff cannot modify or update data elements under the authority and responsibility of other offices. For example, Financial Aid Office staff are not able to change data elements that are entered by the Registrar's Office. Additional Banner security roles only allow individuals with special security classifications in the Financial Aid Offices to make changes to the programs that determine student need and awards, and the system maintains an audit trail, so it is possible to identify the individuals who make such changes.

Position descriptions relevant to the Office of Financial Aid Services are located in the appendix of this manual. Financial aid staff are provided with training on an annual basis through a variety of resources, which includes:

- US Department of Education conferences and web-based training
- NASFAA conferences and web-based training
- EASFAA conferences and web-based training
- CAPFAA conferences and web-based training
- Internal training as needed by CT State, which includes the use of the Banner student information system

Qualified financial aid staff are hired through a rigorous process maintained by Human Resources. Each staff is required to complete ongoing training with varying degrees of frequency as required by CSCU and governing labor contracts.

STAFF TRAINING

CT State employees are subject to routine training on a variety of topical areas, including but not limited to State of Connecticut Diversity Training, Sexual Harassment Training, Title IX Training, Workplace Violence Prevention Training, Ethics Training, FERPA Training, GLBA Training, and SANS IT Security Training. Further information on the frequency of each training is available from the Human Resources Department.

Financial aid staff are additionally subject to the provisions of our [Financial Aid Code of Conduct](#). Staff are provided a copy of the code through email on January 1 and July 1 of each year, with training provided as needed.

2.2.1 PERSONNEL POLICIES

The CSCU Diversity and Inclusion Center of Excellence under the Human Resources Shared Services (HRSS) Office sets procedures for all relevant CSCU policies and all state and federal EEO/AA/Civil Rights laws including, but not limited to, Title VII, Title IX, and the ADA.

They provide guidance and direction on search compliance and diversity recruitment efforts. They develop Affirmative Action plans and provide reasonable accommodations for employees or job applicants in accordance with the Commission on Human Rights and Opportunities (CHRO), AA regulations, and the ADA. They conduct and coordinate state mandated training (diversity, sexual harassment, Title IX and ADA). They investigate allegations of discrimination and sexual harassment and make recommendations for resolution in collaboration with the Labor Relations Center of Excellence, and they facilitate informal resolution/mediation of complaints. The CSCU Center of Diversity and Inclusion Center works with the college Centers of Excellence in efforts to promote diversity, inclusion, and equity and to ensure that each college is compliant with the ADA requirements for employees and students.

The BOR establishes policies for Human Resources under Section 4: Human Resources, with further information located at <https://www.ct.edu/regents/policies>. BOR policies include:

- Non-discrimination, Affirmative Action, Sexual Harassment, and Title IX
- Reporting Attendance
- Code of Ethics
- Financial Disclosure
- Political Activity and Employment
- Professional Development
- Recruiting and Hiring
- Evaluation of Management and Confidential Professional Employees
- Non-continuation, Discipline, Reprimand, Suspension and Termination
- Classification of positions and compensation levels

The CT State Human Resources function is centralized and all matters for recruiting, hiring, and onboarding including pre-employment screenings, and annual performance evaluations are managed by the CSCU Human Resources Shared Services (HRSS) Office. All college HR functions report centrally to the HRSS Office and to the VP of Administration/Chief Financial Officer. This includes ADA, which falls under the HRSS's Diversity and Inclusion Center for Excellence.

2.3 FREQUENT CONTACT INFORMATION

Contact information of relevant central office staff are noted below:

Department	Name	Email Address	Phone Number
Admissions	Tamika Davis	davist@ct.edu	860-612-7019
Academic Advising	Michael Buccilli	buccillim@ct.edu	860-612-7013
Accounts Receivable	Madeline Santiago	santiagom@ct.edu	860-723-0631
Enrollment Management	Tamika Davis	davist@ct.edu	860-612-7019
Finance/Administration	Kerry Kelley	kelleyk@ct.edu	860-612-7028
Finance (G5)	Melinda Cruanes	cruanesm@ct.edu	860-723-0656
Financial Aid	Steven McDowell	mcdowells@ct.edu	860-612-7030
President's Office	Ann Harrison	harrisona@ct.edu	860-612-7025
	John Maduko	madukoj@ct.edu	860-612-7035
Registrar/Enrollment Services	Gayle Barrett	barrettg@ct.edu	860-612-7012

2.3.1 THIRD-PARTY SERVICERS

The nature of any contractual agreement between CT State and a third-party servicer are performed by the CSCU Procurement team, subject to all applicable State of Connecticut contracting laws. CT State maintains its active list of third-party services within its Eligibility & Certification Approval Report (ECAR).

2.4 GENERAL FINANCIAL AID OFFICE ADMINISTRATION

The President provides for a monthly meeting of the CT State Leadership Council, comprised of CT State Cabinet members, AVPs, Deans, and Campus CEOs. Issues surrounding financial aid are communicated to the group at-large, as needed.

The Vice President of Enrollment Management meets bi-weekly with the AVP for Financial Aid Services & Title IV Compliance. The AVP conducts standing bi-weekly leadership and strategy meetings with direct reports. Regional positions meet bi-weekly with Campus Supervisors, and Campus Supervisors meet regularly with their teams on campus. Meetings across all parties also take place on an ad-hoc basis through the year, as needed.

The Office of Financial Aid Services maintains an operational calendar as a means to meet the deadlines of recurring tasks and established deadlines (see appendix).

2.4.1 ACCOMMODATIONS FOR DISABILITIES

POLICY

The BOR and CSCU leadership expect that each institution remains compliant with the Americans with Disabilities ACT (ADA) and assigns a member of the Human Resources team to function with that responsibility. The BOR provides an ADA statement that each college president must complete, sign, and return to the CSCU HR Shared Services Office.

The accommodations, which each student services office is expected to provide, are determined using the Reasonable Accommodation Request Form and Health Care Provider Release Form identified within the procedure for requesting reasonable accommodations under the ADA.

The statement and procedure are located at <https://www.ct.edu/files/pdfs/policy-ADA-ccc.pdf>.

PROCEDURE

Campus Supervisors work with representative ADA Coordinators to ensure that the Financial Aid Office follows the ADA for both employees and students. Each office maintains at least one handicap accessible space with signage that includes braille.

2.4.2 STAFF CUSTOMER SERVICE INTERACTIONS

POLICY

Students may meet with financial aid staff on a walk-in basis during office hours based on staff availability or may make an appointment. Students are not screened to make an appointment, although staff members scheduling appointments may attempt to answer student questions without the need for an appointment, if possible.

PROCEDURE

Most of the college financial aid offices have a financial aid office assistant who staffs the reception desk, although other staff and work-study students may staff the reception desk at times as well. Appointments are scheduled by the staff member at the reception desk or who answers the phone or email by the student requesting the appointment. Appointments are available in person or online via the phone or remote conference.

The identity of the student is verified in person with the Student ID or government issued ID if available, or by the student's name, student ID number, and other identifying information such as registered coursework or other information known only to the student.

2.4.3 TREATMENT OF CORRESPONDENCE/FORMS

POLICY

Common forms are published on the Central Office website for internal access, which may be linked by legacy campuses as needed, at <http://www.commnnet.edu/finaid/Forms.aspx>. Students must print, complete, and provide a wet signature on documents requiring a signature, though they can submit the completed document via fax, mail, or in person. Students also have the option of submitting documents electronically to the Financial Aid Office when logged into my.commnnet.edu and/or Self-Service Banner through the ScanOptics secure digital drop box at <https://cscu.easy-forward.com>. The colleges do not provide an e-signature option for submitting documents at this time.

For document imaging, the Hyland OnBase Unity Client is a document imaging system that allows the ability to import, scan, store, and retrieve electronic documents.

PROCEDURE

Each office has designated staff who receive documents from walk-in students and via fax; they are also responsible for outgoing mail. Staff will note incoming documents are received in the Banner system and then file the documents in the students' paper files. Outgoing email notifications are generated by the Banner system, by the staff member trained in the office to run that procedure.

CSCC financial aid staff members are required to recuse themselves from working on the file of students that they are related to or have a personal relationship or friendship with, due to a possible conflict of interest. For these procedures, refer to Section 15.2 of this manual.

DOCUMENT IMAGING WITH HYLAND ONBASE:

Documents imported into OnBase will be assigned to specific document types/groups and indexed utilizing Banner Student IDs. The procedures to do so are located at:

<http://www.comnet.edu/finaid/Documents/Hyland%20Onbase%20Unity%20Client%20-%20Document%20Imaging.pdf>.

THIRD PARTY SERVICER FOR VERIFICATION - INCEPTIA:

All colleges utilize Inceptia to perform student verification. Inceptia has an online portal (Verification Gateway) that students access to complete the verification process using their own forms, which meet the federal requirements. Students may also utilize the designated CT State common forms. In those situations, office staff may upload the forms to Inceptia for processing and verification or may perform verification for students on a case-by-case basis.

Inceptia receives student documents through their Verification Gateway portal or via fax. E-sign is available to students via Inceptia using DocuSign. Inceptia stores documents in their document imaging systems for 5 years. All documents are also provided to CT State via pdf format, available through the local college administrator section of the Verification Gateway portal.

2.4.4 TELEPHONE

POLICY

CT State utilizes CMD Outsourcing Solutions as a financial aid call center to provide timely support to students with phone inquiries. For inquiries that are not able to be answered by CMD, they are immediately referred to the office for resolution.

Each office has identified staff to answer incoming calls to the main financial aid office line referred by CMD, with backup staff identified. Since staffing in general is limited, phone support to students is more of a team approach to ensure that incoming calls are handled.

PROCEDURE

The types of support provided by CMD, as well as the escalation procedures for the point at which CMD would send a call back to the local college financial aid office to address, are handled in accordance with the terms of the contractual agreement.

TIER 1 SUPPORT:

- Inbound calls or support requests defined as "How To"/"Frequently Asked Questions" (FAQs) and can usually be found on each college's website or through knowledge of institutional processes.
- This type of support would require read only access to Banner so Help Desk staff can authenticate and inform students of their current status.
- Outbound calls designed to prompt a specific action or gather specific data from target group.

TIER 2 SUPPORT:

- This type of support would require read only access to Banner so Help Desk staff can authenticate and inform students of their current status.
- Tier 2 support also includes providing account status information.

TIER 3 SUPPORT

- Tier 3 support is defined as complex questions that require a level of expertise found among the campus staff. Tier 3 questions will be escalated via warm transfer or the vendor ticketing system to the appropriate college's department or staff member.

The availability, operational reliability, and response times of the services to be delivered under the agreement are as specified below.

NORMAL HOURS OF OPERATION

- Seven (7) days per week, with the exception of seven (7) State holidays (Memorial Day, Thanksgiving Day, Christmas Day, Independence Day, New Year's Day, Labor Day and Easter Day).
- Live service shall be available Monday-Thursday, 8am-10pm; Friday, 8am-8pm; Saturday, 8am-5pm; and Sunday 10am-5pm (Eastern Time).

2.4.5 CONFIDENTIALITY OF STUDENT RECORDS

POLICY

CT State's information security policies are outlined in Section 2.5.1 and 2.6. CSCU requires each college to develop and implement policy and procedure for compliance with ensuring information security and confidentiality of students records with all applicable federal and state laws, including FERPA and GLBA. Campus leaders in financial aid and information technology on each campus have the responsibility for identifying and assigning the appropriate security roles in Banner and administering requests for financial aid access. Once those requests for access are made, either the AVP for Financial Aid Services & Title IV Compliance, or designated staff member will review and approve/deny the request. The same procedure is followed for removing access for users.

The following designations are made for the ownership and responsibility of data for financial aid purposes:

- Data Owner: Vice President for Enrollment Management
- Data Owner Designee: AVP for Financial Aid Services & Title IV Compliance
- Data Owner Designee: Campus Supervisors

PROCEDURE

Student information may only be released in accordance with the CSCU FERPA policy. Please refer to Sections 2.6, 2.6.1, 2.6.2, and 2.6.3 for further information on policy and procedures to do so.

All staff are required to participate in FERPA training when they begin employment with CT State, and to annually complete a Security Awareness training which incorporates additional FERPA training. Student workers must sign a FERPA Confidentiality Acknowledgment statement that they understand the policy and will adhere to it.

2.5 RECORDS MANAGEMENT AND RETENTION

POLICY

CT State utilizes the Banner student information system as the system of record. Student records in that system are not deleted or disposed of. Effective May 24, 2021, all colleges utilize a document imaging system through Hyland's OnBase product. Documents in the imaging system fall under the IT Record Retention policy and are retained permanently, as are Banner student records. There are no microfilmed student records, or records on CDs or other media.

The Record Retention Policy for paper documents is a State of Connecticut policy and outside of the scope of the BOR. All paper records are stored by the CT State Public Library System under the record retention policy for the State of Connecticut Public Record (Policy 05: Disposition of Public Records), which requires 3 years following the academic year for all financial aid records which are forwarded to the Connecticut State Library System for retention. Electronic records with Banner, the system of record, are permanently retained.

The Associate Vice President for Enrollment & Retention Services is the coordinator for the policy and process for records management and retention. This role is sometimes referred to as "Data Steward." Offices wanting to move records to storage must complete a request form and submit to the AVP, or designee, for submission to the CT State Public Library for approval in order to move paper records to storage and retention. Disposition of records after the record retention time frames is handled by the Connecticut State Public Library System, upon receipt of a formal written request from the college to dispose of the records, signed by the Data Steward.

The following offices at each college are involved with Title IV records management and retention, and the types of documents each office maintains, and the record retention time frames.

Offices with Student Records	Types of Documents
Admissions	Admissions and Application Status
Advising/Counseling	Degree Audit and Advising Information
Bursar/Student Accounts	Student Charges
Finance (G5)	Ledger Information
Financial Aid Office	Financial Aid Application and Eligibility Documents
Human Resources	FWS Hiring and Payroll Information
Registrar/Enrollment Services	Academic Records and Registration Activity

The State of CT schedule for record retention is located at: <https://atlas.ct.gov/Portal/pages/index.jsp>.

PROCEDURE

Institutions submit the request to transfer student records to storage to the CT State Library System at least 30 days in advance, using form RC-150. The form must be completed by the financial aid Campus Supervisor and submitted to the college Data Steward for review and approval. Once approved, the college Data Steward will submit the request to the CT State Library System for approval. Records will be transferred for storage upon approval.

Colleges must also submit a request for destroying records that are retained using Form RC-108 once those timeframes for record retention have been reached. The Campus Supervisor completes the form RC-108 and submits to the college Data Steward for review, sign-off, and submission to the CT State Library System.

For more information: <https://ctstatelibrary.org/combined-site-search/#stq=public%20records&stp=1>.

2.5.1 SAFEGUARDING ELECTRONIC RECORDS

POLICY

The Information Security Policy passed by the BOR requires the individual colleges to develop and implement information security policies at the local college level and develop and deploy training for them at the colleges as well.

The CSCU Office of Information Technology maintains a Policy & Governance section located at <https://www.ct.edu/it/policy>. This repository includes all policy documents, governance documents, and the IT Strategic Plan.

The CSCU Information Security Policy details the organization and governance for all participants under the policy, and the responsibilities for each.

The CSCU Information Security Program Office (ISPO), under the guidance of the Chief Information Security Officer, develops and maintains the CSCU Information Security Program. The program includes policies, standards, procedures, processes, and guidelines.

The ISPO is also responsible for:

- Developing and implementing security policies, standards and procedures which reflect best practices in information security for higher education;
- Completing IT Risk Assessments and Security Impact Analysis' for IT solutions that may impact the overall IT security of CSCU;
- Implementing and managing the Incident Response Program, this includes, incident identification, documentation, containment and assessment, eradication and recovery, notification and follow up;
- Implementing and managing the Information Security and Awareness Training Program including reporting compliance;
- Implementing and managing the Security Metrics and reporting program;
- Working with external organizations and cloud providers to ensure compliance with CSCU security requirements and the Vendor Compliance Program;
- Reviewing on-going compliance with laws and regulations related to information security;
- Providing guidance and assistance to college/universities in the development of their Campus Information Security Programs;
- Implementing and managing of the Vulnerability Management and Threat Intelligence program, and;
- Assisting Information Security Owners with completion of System Security Plans, SSP.

The ISPO repository is located at <https://www.ct.edu/it/security>.

The BOR also maintains a policy related to the design, implementation, operational management, and assurance/compliance of the information security program.

Relevant IT Policies:

- <https://www.ct.edu/files/policies/5.5%20Design%20Imp%20Ops%20and%20Compliance%20of%20IT%20Security%20functions.pdf>
- https://www.ct.edu/files/it/BOR_IT-004.pdf

PROCEDURE

CT State's information security plans at the college levels are designed to integrate the need for Information security with the need to support the mission of the college and to accommodate the fundamental purposes for which our academic enterprise exists. CT State advances academic, economic, civic, personal, and cultural growth by providing comprehensive, innovative and affordable learning opportunities to diverse populations. They are a learning-centered community committed to access, excellence and relevance. As information and technological distribution channels continue to proliferate, so do associated risks. This proliferation of risk combined with increasing regulation and penalties associated with security breaches creates a tendency to view security as the end-goal instead of as one activity that supports the essential business of education. While CT State strives to maintain an information security agenda that maximizes confidentiality, integrity, and availability of information and technology resource, the methods and protocols must be enablers of our institutional processes. In order to maintain a proper balance between maximum security and institutional operations this plan is designed to be flexible enough to readily accommodate changes in both technology security means and methods and the academic demands of the institution.

CT State's Financial Aid Security Procedures includes basic guidance and procedures for Banner security roles and classes for financial aid staff, covering the following areas:

- Family Educational Rights and Privacy Act (FERPA)
- Federal Trade Commission (FTC) "Red Flags Rule"
- Gramm-Leach-Bliley Act (GLBA)
- Higher Education Act (HEA)
- Program and Participation Agreement (PPA)
- Privacy Act of 1974 (as amended)
- Student Aid Internet Gateway (SAIG) Agreement

<http://www.commnet.edu/finaid/Documents/Security%20Policies%20and%20Procedures%20%20Sept%202015.pdf>

2.6 INFORMATION SHARING AND FERPA

POLICY

The Family Educational Rights and Privacy Act (FERPA) affords eligible students certain rights with respect to their educational records. An "eligible student" is a student who is 18 years of age or older, or who attends a postsecondary institution at any age. These rights are distributed to students annually by way of an annual notice. Policy: <https://www.ct.edu/files/policies/2.2%20FERPA%20and%20Directory%20Info.pdf>

Family Educational Rights and Privacy Act (FERPA) Notice and Directory Information Policy

The Family Educational Rights and Privacy Act (FERPA) affords students certain rights with respect to their education records. These rights include:

1. The right to inspect and review the student's education records within 45 days of the day the College or University receives a request for access. Students should submit to the registrar, dean, head of the academic department, or other appropriate official, written requests that identify the record(s) they wish to inspect. The College or University official will make arrangements for access and notify the student of the time and place where the records may be inspected. If the records are not maintained by the College or University official to whom the request was submitted, that official shall advise the student of the correct official to whom the request should be addressed.

2. The right to request amendment of an education record that the student believes is inaccurate. Students may ask an appropriate College or University official to amend a record that they believe is inaccurate, misleading or a violation of the student's right to privacy. However, FERPA is not intended to provide a process to question substantive judgments that are correctly recorded. Consequently, FERPA amendment requests do not allow a student to contest a grade in a course because the student believes that a higher grade should have been assigned. To request amendment of an education record, the student should write to the official, clearly identifying the part of the record he or she wants changed and specifying why he/she believes it is inaccurate. The institution will notify the student of the decision. If the institution decides not to amend the record as requested by the student, a College or University official will advise the student of his or her right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.

3. The right to provide written consent before the College or University discloses personally identifiable information (PII) from the student's education records, except to the extent that FERPA authorizes disclosure without consent. FERPA permits disclosure without a student's prior written consent under the FERPA exception for disclosure to school officials who have a legitimate educational interest. A "school official" is a person employed by a College or University in an administrative, supervisory, academic, research, or support staff position (including law enforcement unit personnel and health staff); a person serving on the Board of Regents; an employee of the Connecticut State Colleges and Universities system office; or, a student serving on an official committee, such as a disciplinary or grievance committee. A school official also may include a volunteer or contractor outside of the College or University who performs an institutional service or function for which the College or University would otherwise use its own employees and who is under the direct control of the College or University with respect to the use and maintenance of PII from education records, such as an attorney, auditor, or collection agent or a student volunteering to assist another school official in performing his or her tasks. A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for the College or University. Upon request, the College or University also discloses education records to officials of another school in which a student seeks or intends to enroll without the prior consent of, or notice to, the student.

FERPA also permits disclosure of education records without consent in connection with, but not limited to:

- To comply with a judicial order or a lawfully issued subpoena;
- To appropriate parties in a health or safety emergency;
- In connection with a student's request for or receipt of financial aid, as necessary to determine the eligibility, amount or conditions of the financial aid, or to enforce the terms and conditions of the aid;
- To certain officials of the U.S. Department of Education, the Comptroller General, to state and local educational authorities, in connection with certain state or federally supported education programs;
- To accrediting organizations to carry out their functions;
- To organizations conducting certain studies for or on behalf of the College or University;
- The results of an institutional disciplinary proceeding against the alleged perpetrator of a crime of violence to the alleged victim of that crime with respect to that crime.
- Directory information as defined in the policy of the Board of Regents.

4. The right to refuse to permit the College or University to release Directory Information about the student, except to school officials with a legitimate educational interest and others as indicated in paragraph 3 above. To do so, a student exercising this right must notify the University's or College's Registrar, in writing. Once filed, this notification becomes a permanent part of the student's record until the student instructs the University or College, in writing, to remove it. A student may exercise his or her right to opt out of Directory Information, prohibiting disclosure of the student's information without the student's consent as noted in section 3, except however, that pursuant to the Solomon Amendment, military recruiters must be provided the same access to student information as is provided to nonmilitary recruiters.

5. The right to file a complaint with the U.S. Department of Education concerning alleged failures by Colleges to comply with the requirements of FERPA. The name and address of the Office that administers FERPA is:

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-4605

Directory Information Policy

Acknowledging that Directory Information is FERPA protected information that may be disclosed at the discretion of a College or University, it is the policy of the Board of Regents for Higher Education for the Connecticut State Colleges and Universities that disclosure of Directory Information is within the sole discretion of the College or University. Colleges and Universities may disclose Directory Information without the prior consent of the student only as provided herein.

The Board of Regents for Higher Education has designated the following as Directory Information:

For purposes of access by school officials of the Colleges and Universities governed by the Board of Regents for Higher Education, the following is designated as Directory Information:

- Student's legal name
- Permanent mailing address
- Month and day of birth
- Photographs
- Student identification number, User ID, or other unique identifier
- Email address
- Telephone number
- University or College previously attended or currently attending
- Dates of attendance
- Full vs. part-time student status
- Academic honors and awards
- Class standing/year
- Major, minor, concentration and/or program of study
- Degree(s)/Certificate(s) candidacy
- Degree(s)/Certificate(s) earned
- Previous Institutions attended
- Graduation expected/completion dates

For purposes of access by military recruiters only, the following is designated as Directory Information (Student Recruiting Information):

- Student's legal name
- Permanent mailing address
- Student email address (issued by the institution)
- Telephone number
- Age
- Place of birth
- Class standing/year
- Major and/or program of study
- Degrees received
- Most recent educational institution attended

For purposes of participation in any recognized activity or sports, the following is designated as Directory Information:

- Student's preferred name
- City and State of Residence
- Dates of attendance
- Class standing/Year
- Recognized activity or sport
- Team performance statistics
- Team position
- Photos and videos
- Athletic honors and awards
- Height and weight of athlete

For purposes of disclosure to/access by the general public, the following is designated as Directory Information:

- Student's preferred name
- Permanent mailing address
- Photographs
- Dates of attendance
- Major, minor, concentration and/or program of study
- Degree/Certificate candidacy
- Degree(s)/Certificate(s) earned
- Academic honors and awards
- Full vs. Part-time status
- Anticipated graduation date
- Graduation date

PROCEDURE

CT State has both electronic and paper copies of student records. Electronic records in the Banner system are password protected and only authorized users have access. Paper files are stored in locked offices and file rooms which are only available to authorized staff.

Students who wish to request amendment of an educational record should write to the college official, usually the Registrar, clearly identifying the part of the record he or she wants changed and specifying why he/she believes it is inaccurate. The institution will notify the student of the decision. If the institution decides not to amend the record as requested by the student, a college official will advise the student of his or her right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when notified of the right to a hearing.

If a student does not want directory information released, the student has a right to refuse to permit the college to release Directory Information, except to school officials with a legitimate educational interest. To do so, a student exercising this right must notify the Registrar in writing. Once filed, this notification becomes a permanent part of the student's record until the student instructs the institution, in writing, to remove it.

2.6.1 INTERNAL DISCLOSURE

POLICY

Financial Aid staff may share student information with other school officials as well as contractors, consultants, volunteers, or other parties to which the college has outsourced services or functions, per section 3 below from the FERPA policy.

"The right to provide written consent before the College or University discloses personally identifiable information (PII) from the student's education records, except to the extent that FERPA authorizes disclosure without consent. FERPA permits disclosure without a student's prior written consent under the FERPA exception for disclosure to school officials who have a legitimate educational interest.

A "school official" is a person employed by a College or University in an administrative, supervisory, academic, research, or support staff position (including law enforcement unit personnel and health staff); a person serving on the Board of Regents; an employee of the Connecticut State Colleges and Universities system office; or, a student serving on an official committee, such as a disciplinary or grievance committee. A school official also may include a volunteer or contractor outside of the College or University who performs an institutional service or function for which the College or University would otherwise use its own employees and who is under the direct control of the College or University with respect to the use and maintenance of PII from education records, such as an attorney, auditor, or collection agent or a student volunteering to assist another school official in performing his or her tasks. A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for the College or University. Upon request, the College or University also discloses education records to officials of another school in which a student seeks or intends to enroll without the prior consent of, or notice to, the student."

The types of information provided to the servicer who performs verification includes the FAFSA and supporting documentation. The type of information provided to call center servicers includes basic information available in Banner such as financial aid status, admissions status, registration status, and student accounts information. Information provided to collectors typically includes the student's name, contact information, and student account balance. Information typically provided to school officials in other offices includes awards and award amounts, depending on the office and need for the information.

PROCEDURE

All school employees may have access to student information without prior consent per the FERPA policy if they have a legitimate educational reason to do so. Security class restrictions in the Banner systems may restrict access to only student information typically needed for their job role. Staff who want financial aid information or other student information that they do not have access to in Banner must contact the Director of Financial Aid or Registrar, depending on the type of student information, to discuss their student data request and to demonstrate their need for the information.

Staff are provided with the FERPA policy when hired and are subject to annual training. Financial Aid staff are not required to sign a confidentiality statement but are expected to maintain complete confidentiality of student records.

2.6.2 EXTERNAL DISCLOSURE

POLICY

Financial Aid staff may share student information with outside agencies who qualify as “school officials” under the FERPA policy as described in Section 2.6. Below is a list of the typical types of disclosures that are made, from the FERPA policy.

FERPA also permits disclosure of education records without consent in connection with, but not limited to:

- To comply with a judicial order or a lawfully issued subpoena;
- To appropriate parties in a health or safety emergency;
- In connection with a student's request for or receipt of financial aid, as necessary to determine the eligibility, amount or conditions of the financial aid, or to enforce the terms and conditions of the aid;
- To certain officials of the U.S. Department of Education, the Comptroller General, to state and local educational authorities, in connection with certain state or federally supported education programs;
- To accrediting organizations to carry out their functions;
- To organizations conducting certain studies for or on behalf of the College or University;
- The results of an institutional disciplinary proceeding against the alleged perpetrator of a crime of violence to the alleged victim of that crime with respect to that crime.
- Directory information as defined in the policy of the Board of Regents.

Parents may request to discuss their student’s records with the college staff. In accordance with the FERPA policy, information is shared only with those parents for whom the college has a signed FERPA release by the student on record in the college Registrar’s Office which specifically gives permission for the college to share information with the named parent.

Please see Section 2.6.3 and 2.6.4 for more information.

PROCEDURE

Information requests may be made to the Campus Registrar or Dean of Students. Once the Registrar receives a request from a student for review of their records or a copy of their records, the Registrar will respond within 45 days to accommodate the student.

School officials requiring student financial aid information make those requests directly to the financial aid office. The financial aid office will generally respond within 5 days with that information.

Non-school officials, such as law enforcement officials requesting student information, must make all requests for student information directly to the Registrar’s Office. Those requests, if in person, are generally handled on the same day. If the request is not in person, the request is generally handled within 5 days.

2.6.3 AUTHORIZATION FORM

POLICY

If a student wants to review their own records and/or request a copy of their records, the student should submit a request in writing to the Registrar at their college using the designated form. Parents may not request to review and/or receive a copy of a student’s records. That request must come from the student through the use of an authorization form.

In compliance with the portions of the FERPA policy as shown below and for school officials as defined within the FERPA policy, the colleges will provide FERPA provided student records ONLY to school officials with a legitimate educational interest to have that information, without a written authorization.

FERPA affords students certain rights with respect to their education records. These rights for CSCC students include:

The right to inspect and review the student's education records within 45 days of the day the College or University receives a request for access. Students should submit to the registrar, dean, head of the academic department, or other appropriate official, written requests that identify the record(s) they wish to inspect. The College or University official will make arrangements for access and notify the student of the time and place where the records may be inspected. If the records are not maintained by the College or University official to whom the request was submitted, that official shall advise the student of the correct official to whom the request should be addressed.

The right to provide written consent before the College or University discloses personally identifiable information (PII) from the student's education records, except to the extent that FERPA authorizes disclosure without consent. FERPA permits disclosure without a student's prior written consent under the FERPA exception for disclosure to school officials who have a legitimate educational interest. A "school official" is a person employed by a College or University in an administrative, supervisory, academic, research, or support staff position (including law enforcement unit personnel and health staff); a person serving on the Board of Regents; an employee of the Connecticut State Colleges and Universities system office; or, a student serving on an official committee, such as a disciplinary or grievance committee. A school official also may include a volunteer or contractor outside of the College or University who performs an institutional service or function for which the College or University would otherwise use its own employees and who is under the direct control of the College or University with respect to the use and maintenance of PII from education records, such as an attorney, auditor, or collection agent or a student volunteering to assist another school official in performing his or her tasks. A school official has a legitimate educational interest if the official needs to review an education record in order to fulfill his or her professional responsibilities for the College or University. Upon request, the College or University also discloses education records to officials of another school in which a student seeks or intends to enroll without the prior consent of, or notice to, the student.

Non-School Officials:

Non-school officials are only granted access to education records in compliance with a judicial order or a lawfully issued subpoena, as described in the portion of FERPA policy below. FERPA also permits disclosure of education records without consent in connection with, but not limited to:

- To comply with a judicial order or a lawfully issued subpoena;
- To appropriate parties in a health or safety emergency;
- In connection with a student's request for or receipt of financial aid, as necessary to determine the eligibility, amount or conditions of the financial aid, or to enforce the terms and conditions of the aid;
- To certain officials of the U.S. Department of Education, the Comptroller General, to state and local educational authorities, in connection with certain state or federally supported education programs;
- To accrediting organizations to carry out their functions;
- To organizations conducting certain studies for or on behalf of the College or University;
- The results of an institutional disciplinary proceeding against the alleged perpetrator of a crime of violence to the alleged victim of that crime with respect to that crime.
- Directory information as defined in the policy of the Board of Regents.

At most CSCC colleges, non-school officials must report to the Registrar's Office at the college and present the judicial order and/or subpoena, and the Registrar will coordinate the gathering of the required records and document the release of the information. At most of the CSCC colleges, non-school officials are not required to

complete an additional authorization form. They must only provide an original judicial order and/or subpoena, and a government issued ID.

PROCEDURE

Once the Registrar receives a request from a student for review of their records or a copy of their records, the Registrar will respond within a reasonable timeframe to accommodate the student.

School officials requiring student financial aid information make those requests directly to the financial aid office. The financial aid office will generally respond within 5 days with that information.

Non-school officials must make all requests for student information directly to the Registrar's Office, at most CCCC colleges. Those requests, if in person, are usually handled on the same day. If the request is not in person, the request is usually handled within 5 days.

2.6.4 INFORMATION RELEASE VIA TELEPHONE

POLICY

Students can call directly to the financial aid office at their local campus. Only directory information is released if the caller cannot be identified as the student. Once the student's identity is verified, the student's financial aid information, student account's information, and any information which impacts the student's eligibility for aid is discussed with the student on the phone.

The college staff will not disclose any non-directory information to anyone except the student, unless that person has a FERPA Waiver Form signed by the student. In that case, for some colleges, the staff will disclose parental information only.

The FERPA Waiver Form may be housed by Enrollment Services, and is available at

<https://ctstate.edu/uploads/Forms-Documents/Enrollment-Services/Registration-Forms/CT-State-Student-Information-Release-Authorization-FINAL-PAPER-03222023.pdf>

CMD Outsourcing Solutions, the call center of CT State, has the following policy statement for releasing student information per the contract:

"In all respects, Contractor shall comply with the provisions of the Family Educational Rights and Privacy Act (FERPA). For purposes of this contract, FERPA includes any amendments or other relevant provisions of federal law, as well as all requirements of Chapter 99 of Title 34 of the Code of Federal Regulations, as amended from time to time. Nothing in this agreement may be construed to allow Contractor to maintain, use, disclose or share student information in a manner not allowed by federal law or regulation or by this contract. Contractor agrees that it shall not provide any student information obtained under this contract to any party ineligible to receive data protected by FERPA. This section shall survive the termination, cancellation or expiration of the contract."

PROCEDURE

The identity of the student is typically verified by asking for two of the following in addition to the student's name: Banner ID, date of birth, and last four digits of the social security number.

The Student module of Banner houses a record of completion, if any, of a FERPA form for a student.

CMD's procedural statement per the contract:

"When students call in the agents always verify if they are speaking with the student or the parent. We do not speak to parents unless there is FERPA information in the RAHCOMM screen and they are able to verify the

student's information. When verifying the student's information we ask for the student's ID number, first and last name, and date of birth. If the student does not have their student ID we look them up by first and last name and still verify 2 other factors such as DOB and email address or mailing address."

2.6.5 FERPA RELATED RECORDKEEPING REQUIREMENTS

POLICY

The colleges maintain a record of each request for access to and each disclosure of personally identifiable information from a student's education records, as well as the names of state and local educational authorities and federal officials and agencies that may re-disclose personally identifiable student information without consent. At most colleges, this record is maintained by the Registrar. For each request, the college notes who requested or received personally identifiable information from the education records, as well as the legitimate educational interest those parties had in making such requests or obtaining such information.

For more information on record retention policy, please refer to Section 2.5. For more information on what information is protected by FERPA, refer to Section 2.6.

PROCEDURE

Requests must go through the Registrar at most of the institutions. For records that have already been submitted to the CT Public Library System for storage, the college must submit a request to the CT Public Library System for transfer of the record back to the college, using Form RC-150.

For more information on the record retention procedure, please refer to Section 2.5.

2.7 CYBER SECURITY

POLICY

CT State required to comply with the following items related to Cyber Security:

- FSA Program Participation Agreement
- Student Aid Internet Gateway Agreement
- Gramm-Leach-Bliley Act of 2002
- [GEN 15-18](#) – Protecting Student Information
- [GEN 16-12](#) – Protecting Student Information
- Family Educational Rights and Privacy Act
- Connecticut General Statutes [36a-701b](#) and [4e-70](#)

All Title IV postsecondary institutions are financial institutions per the Gramm-Leach-Bliley Act of 2002. In accordance with the institution's PPA and SAIG Agreement, CT State has the following GLBA safeguards in place:

- Maintains a documented data security program
- Designates staff to coordinate the program
- Identifies reasonably foreseeable internal and external risks to data security via formal, documented risk assessments of:
 - Employee training and management
 - Information systems, including network and software design, as well as information processing, storage, transmission, and disposal

- The ability to detect, prevent, and respond to attacks, intrusions, or other system failures
- Controls the risks identified by providing information safeguards with regular testing to monitor effectiveness
- Oversees service providers by:
 - Taking reasonable steps to select and retain service providers that are capable of maintaining appropriate safeguards for the FSA, student, and school information at issue
 - Requiring service providers by contract to implement and maintain such safeguards
- Evaluates and adjust the data security program in light of:
 - The results of required testing/monitoring
 - Any material changes to operations or business arrangements
 - Any other circumstances that may have a material impact on the information security program.

The CSCU Information Security Program Office is responsible for the ongoing development and maintenance of the Information Security Program. This is done under the guidance of the Chief Information Security Officer.

Refer to the CSCU Information Security Program Office for more information: <https://www.ct.edu/it/security>

PROCEDURE

All institutions within CSCC are required to report to the US Department of Education both actual and suspected data breaches on the same day that the data breach is detected or suspected.

A data breach is defined as "any unauthorized disclosure, misuse, alteration, destruction, or other compromise of information, such as unauthorized access."

To report a breach, email cpssaig@ed.gov with a copy to the:

- CSCU Chief Information Officer
- College President/CEO
- Regional President
- Vice President for Enrollment Management & Student Affairs
- Associate Vice President for Financial Aid Services & Title IV Compliance

The email should include the:

- Date of the breach (known or suspected),
- Impact of the breach (number of records, number of students, etc.),
- Method of the breach (hack, accidental disclosure, etc.),
- Information security program point of contact (email address and phone number are required),
- Remediation status (complete, in-process, etc. with detail), and
- Next steps (as needed).

You can also email FSAschoolcybersecurity@ed.gov. If you cannot email, you should call the Department's security operations center (EDSOC) at 202-245-6550 to report the data listed above. EDSOC operates 24 hours a day, seven days per week. If both previous breach reporting methods fail, you should call or email Tiina Rodrigue at 202-377-3887 or tiina.rodrigue@ed.gov. After the initial report, breach status updates can be emailed directly to Tiina.

ED established the Privacy Technical Assistance Center (PTAC) as a "one-stop" resource for educational institution on privacy issues. PTAC has developed a checklist of critical breach response components and steps to assist in building a comprehensive data breach response capability. Please review the [Data Breach Response Checklist](#) for guidance. Also visit [PTAC](#) for more information and for additional guidance on student privacy concerns.

Refer also to ED's FSA [Cybersecurity Compliance webpage](#), a centralized location for guidance related to cybersecurity and data protection.

SECTION 3: FINANCIAL AID PROGRAMS

3.1 INSTITUTIONAL ELIGIBILITY REQUIREMENTS

POLICY

As of May 1, 2023, all individual community colleges are fully accredited by the New England Commission of Higher Education (NECHE). CT State is in the process of seeking approval from NECHE to become a singly accredited institution as a result of the proposed merger of Connecticut's 12 community colleges, with a proposed effective date of July 1, 2023. The most up to date information is available at <https://www.ct.edu/merger>.

College Name	Accreditation Status	Effective Date
Asnuntuck Community College	Continued in Accreditation	2016
Capital Community College	Continued in Accreditation	2017
Gateway Community College	Continued in Accreditation	2016
Housatonic Community College	Continued in Accreditation	2012
Manchester Community College	Continued in Accreditation	2012
Middlesex Community College	Continued in Accreditation	2014
Naugatuck Valley Community College	Continued in Accreditation	2013
Northwestern CT Community College	Continued in Accreditation	2013
Norwalk Community College	Continued in Accreditation	2015
Quinebaug Valley Community College	Continued in Accreditation	2012
Three Rivers Community College	Continued in Accreditation	2013
Tunxis Community College	Continued in Accreditation	2022

Source: <https://www.neche.org/institutions/ct/>

As of May 1, 2023, all individual community colleges are fully certified by the US Department of Education. The Program Participation Agreement (PPA) and Eligibility and Certification Approval Report (ECAR) for each college is available at <https://eligcert.ed.gov>.

College Name	Certification Type	Recertification Date
Asnuntuck Community College	Full	06/30/2023
Capital Community College	Full	12/31/2025
Gateway Community College	Full	12/31/2025
Housatonic Community College	Full	06/30/2024
Manchester Community College	Full	12/31/2027
Middlesex Community College	Full	06/30/2027
Naugatuck Valley Community College	Full	09/30/2023
Northwestern CT Community College	Full	12/31/2025
Norwalk Community College	Full	06/30/2025
Quinebaug Valley Community College	Full	09/30/2024
Three Rivers Community College	Full	12/31/2027
Tunxis Community College	Full	06/30/2028

CT State does not offer correspondence coursework. The only incarcerated students enrolled are associated with the Second Chance Pell Experimental Site Initiative, which constitutes less than 25% of all enrolled students. None of the individual community colleges have filed for bankruptcy, or do they have an order for relief in bankruptcy entered against them. None of the individual campus Presidents/CEOs have pled guilty to, pled nolo contendere to, or have been judicially determined to have committed fraud involving Title IV funds.

The AVP is responsible for monitoring institutional Title IV eligibility. This includes making any relevant updates to the E-App and performing all required recertification activities with the US Department of Education.

PROCEDURE

The AVP for Financial Aid Services & Title IV Compliance is responsible for monitoring institutional Title IV eligibility. This includes making any relevant updates to the E-App and performing all required recertification activities with the US Department of Education.

Communication channels include campus announcements of instructional or operation changes, as needed.

3.1.1 PROGRAM ELIGIBILITY

POLICY

CT State offers both transfer/general education degrees as well as vocational degrees and non-degree programs. The eligible non-degree programs are at least 16 credit hours, span an academic year, and lead students to become gainfully employed or receive a recognized credential. None of the institutions offers a comprehensive transition and postsecondary program for students with intellectual disabilities.

CT State provides financial assistance to students based on a standard term with credit hours. The academic year is 30 weeks in length and 24 credit hours.

Each institution grandfathers in Ability-to-Benefit (ATB) students; the system does not have ATB students under the Career Pathway provisions.

A listing of all academic programs is searchable to the public at <https://ctstate.edu/programs>, which includes the locations offering each program.

STUDENT COMPLAINTS

In compliance with the HEOA of 2008, CSCU investigates all written and signed student complaints against the colleges and universities in the CSCU system. Additionally, CSCU also provides prospective and enrolled students with contact information for filing complaints with our accrediting agency and other appropriate state agencies. Students seeking to file a formal complaint may do so using the CSCU Complaint Process, available at <https://www.ct.edu/complaint>.

PROCEDURE

The approval process for academic programs within each institution follows the following workflow:

1. Programs are developed locally and brought to the Academic Council for review and recommendation. The Council consists of the CSCU Provost and Senior Vice President for Academic & Student Affairs, as well as all Academic Deans from each CSCU institution.

2. Programs are then presented to the Academic and Student Affairs Committee of the BOR. The Committee has an opportunity to comment and provide feedback on the program, as needed.
3. Upon recommendation of the Committee, the program is brought to the full BOR for approval.
4. Upon approval of the BOR, program information is transmitted to the Connecticut Office of Higher Education.
5. Within 10 days of approval, CT State will provide any required updates to the E-App, as required.

STUDENT COMPLAINTS

Any complaints that are submitted through the formal complaint process that consider CT State will be worked toward resolution between the system office, the College, and the student. Any complaints made on behalf of a student directly to the US Department of Education or US Department of Veteran's Affairs will be managed at the College and responded to accordingly.

3.1.1.1 INELIGIBLE PROGRAMS

POLICY

Not all academic programs are Title IV-eligible. Specifically, those credit-based non-degree programs that do not meet the minimum threshold are ineligible.

PROCEDURE

Ineligible programs are not assigned Title IV eligibility within the Banner student information system, namely within the STVMAJR and RWVMAJR forms. This prevents any federal, state, and institutional financial aid from being disbursed to students not in an eligible academic program.

3.1.1.2 EVALUATION OF NEW PROGRAMS

CT State evaluates new programs to ensure they meet the following for Title IV eligibility during the initial review process, which is subsequently reviewed by the applicable BOR Committee and the full BOR:

- Degree or Non-Degree (Certificate) approvals by state (if required), accreditor, and ED.
- Non-Degree (Certificates) must be at least 16 credit hours plus one year in length (unless the institution is also considered vocational). Eligible programs must also lead to gainful employment in a recognized occupation.
- Standard, Non-Standard, Non-Term considerations.
- CBE or Direct Assessment may require additional consideration.
- Delivery modalities may require additional consideration.
- All support services in place.

PROCEDURE

Academic programs that are new, modified, or discontinued follow the process identified in Section 3.1.1. From the system office, the program will go to the CT Office of Higher Education for recording. Certificate programs then need to go to ED for inclusion on the schools' Eligibility Certification and Approval Record (ECAR) within 10 days of approval, as required. Associate programs do not need approval by ED unless otherwise noted by a provisional recertification status.

3.1.2 ADMINISTRATIVE CAPABILITY

CT State makes concerned and concise efforts to meet the standards of administrative capability as provided in 34 CFR 668.16. This is demonstrated when CT State:

- Administers Title IV programs in accordance with all statutory provisions applicable to Title IV or the Higher Education Act.
- Designates a capable individual to be responsible for administering the Title IV/HEA programs and coordinating those with institutional and other aid or resources.
- Uses an adequate number of qualified staff to administer the Title IV/HEA programs in which the institution participates.
- Communicates to the individual designated to administer the Title IV/HEA program all information needed for determining student eligibility.
- Ensures adequate checks and balances are in place to handle approval, disbursement, and delivery of federal funds.
- Establishes and maintains appropriate and required records for Title IV/HEA programs.
- Reports all required information to the U.S. Department of Education applicable to Title IV/HEA programs.
- Develops a process by which student progressing is accessed.
- Develops a system by which any discrepancies are identified and resolved during the student application process for federal aid.
- Refers to the Office of Inspector General any cases of suspected fraud involving federal funds.
- Provides adequate financial aid counseling to eligible students.
- Provides all required fiscal and program reports in a timely manner.
- Show no significant problems that affect the institution's ability to administer federal funds.
- Does not have any principal or affiliate debarred or suspended.

POLICY

CT State administers Title IV aid in accordance with all applicable statutory and regulatory provisions as monitored by the Connecticut Auditors of Public Accounts (APA), a legislative agency of the State of Connecticut, with the primary mission to audit state agencies. APA utilizes ED's single audit requirements. Part of the auditing process will determine the schools are administratively capable.

PROCEDURE

Refer to Section 16 (Audits) for additional information.

3.1.2.2 ADMINISTRATION

POLICY

CT State has designated the AVP for Financial Aid Services & Title IV Compliance as a capable individual to administer the Title IV/HEA programs. The AVP coordinates the dissemination of relevant information impacting Title IV eligibility to all affected parties within the college. This College's financial aid office and staffing structure are discussed in Section 2 of this manual.

PROCEDURE

CT State performs annual benchmarking of adequate staffing volume using the NASFAA Staffing Model on an annual basis. This tool is available at https://www.nasfaa.org/staffing_model.

Note: Due to the COVID-19 pandemic, NASFAA has not updated their Staffing Model since 2019. This analysis will be repeated when the model becomes available in 2023.

3.1.2.3 RESPONSIBILITIES OF INSTITUTIONAL OFFICES

POLICY

The Financial Aid Office awards eligible students with funding from federal, state, and institutional sources, as well as external scholarships and private educational loans. The Business Office delivers refunds to students. The Financial Aid Office reports disbursement information to ED through Common Origination and Disbursement (COD). The Business Office draws down federal funds from G5.

Inceptia is contracted to perform verification on applications selected; the college may perform verification on applications that are self-selected.

PROCEDURE

An automated process, typically done during off-peak hours, transmits awards to student accounts which are then reviewed by the Finance Office to determine if an overage (credit balance) is to be delivered to the student. Where appropriate, the Finance Office will place a refund amount on the student account which is then delivered through direct deposit or paper check to the student. The refund process is handled completely by the Finance Office. Any credit balances owed to students are delivered within 14 days.

CT State contracts with Inceptia to perform verification on federal aid applications; financial aid staff members address any “C” codes or rejects. Once verification is completed and “C” codes have been satisfied, the applications are awarded federal funds. The financial aid staff is also responsible for awarding state aid, institutional aid, and external aid (when applicable).

Financial aid staff members report disbursements to COD. After ED accepts disbursement records, funds are made available through G5. The Finance Office draws down funds from G5 which are deposited into the appropriate college bank accounts.

3.1.2.4 SEPARATION OF DUTIES

POLICY

CT State maintains a distinct separation of duties between the Financial Aid Office and the Business Office, which are validated by the disbursement process coded within Banner (see Section 11).

The Financial Aid Office approves and awards all funding from federal, state, and institutional sources, as well as external scholarships and private educational loans (when applicable). The Business Office delivers refunds to students. The Financial Aid Offices report disbursement information to ED through COD. The Business Office draws down federal funds from G5.

PROCEDURE

An automated process, typically done during off-peak hours, transmits awards to student accounts which are then reviewed by the Finance Office to determine if an overage (credit balance) is to be delivered to the

student. Where appropriate, the Finance Office will place a refund amount on the student account which is then delivered through direct deposit or paper check to the student. The refund process is handled completely by the Finance Office. Any credit balances owed to students are delivered within 14 days.

CT State contracts with Inceptia to perform verification on federal aid applications; financial aid staff members address any “C” codes or rejects. Once verification is completed and “C” codes have been satisfied, the applications are awarded federal funds. The financial aid staff is also responsible for awarding state aid, institutional aid, and external aid.

Financial aid staff members report disbursements to COD. After ED accepts the disbursement record, funds are made available through G5. The Finance Office draws down funds from G5 which are deposited to institutional bank accounts.

3.1.2.5 RECORDS

POLICY

Historically, legacy community colleges had operated as paper-based, with these documents shredded or transferred to storage, as appropriate, at the appropriate time. Records are kept in locked file cabinets in designated secure rooms. As of May 2021, CT State has adopted the use of OnBase to digitize documentation and move away from a paper-based office. Refer to Section 2.5 for Record Retention policies.

PROCEDURE

Refer to Section 2.5 for procedures related to Record Retention.

3.1.2.6 ELECTRONIC PROCESSES

POLICY

CT State participates in all of the following electronic processes:

- Electronic records exchanged with Common Origination and Disbursement (COD)
- Electronic records exchanged with National Student Loan Data System (NSLDS)
- Electronic records exchanged with Central Processing System (CPS)
- Fiscal Operations Report and Application to Participate (FISAP)
- Update of the Program Participation Agreement (PPA) and Application to Participate in the Federal Student Financial Aid Programs (E-App).

The verification process is performed by Inceptia. Institutions permit students to electronically sign verification documents through DocuSign by way of Inceptia's Verification Gateway.

PROCEDURE

CT State uses various Banner processes to accommodate all the electronic data exchange processes identified above. In addition, the updating of information (i.e., updating the E-App, completing the FISAP) is done by way of access through the appropriate ED channels.

3.1.2.7 CHECKING VALIDITY OF HIGH SCHOOL COMPLETION

POLICY

BOR policy, by way of affirmation of the prior community college Board of Trustees policy, indicates regular (e.g., degree or certificate-seeking) students will be required to provide a copy of either their high school diploma, GED, or high school transcript to matriculate as a “regular” (degree or certificate-seeking) student. These documents need to be submitted to the Admissions department, which is initiated during the application process. If a student is a GED recipient, the student must provide a copy of the GED transcript. Admissions will review all GED and high school transcripts to confirm that they are official documents. If Admissions determines that a GED or high school transcript may have been tampered with, a request will be made to the respective institution to validate the document. If a request is made, all transcripts or official documents must be presented to Admissions in a sealed envelope with the school/institution logo or faxed from the official school/institution where the student received the transcript or official document.

Any fees associated with obtaining the transcript are the responsibility of the student. No student financial aid will be disbursed for the student if Admissions does not have documentation that properly validates high school graduation.

PROCEDURE

To verify that a school is legitimate, Admissions will check the state department of education website. Home schooled students will be required to provide a transcript from their local school district or a transcript certified by a parent. Appropriate steps would be enforced in other states as well. A student that submits a diploma or official document from a foreign country will have their document translated by an appropriate official to verify that their diploma is a valid high school diploma.

3.1.2.7 INFORMATION DISCREPANCIES

POLICY

CT State keeps a close check on situations where students, school employees, or third-party servicers may have or attempted to engage in fraud or other criminal misconduct in connection with the Title IV programs. In such a situation, the institution will refer credible information for investigation to ED’s Office of Inspector General (OIG). For additional information, refer to Section 15 on Title IV Fraud.

The institutions apply an adequate system to identify and resolve discrepancies in the information it receives from different sources with respect to a student's application for Title IV aid. The process is otherwise known as resolving conflicting information. For additional information, refer to Section 7.1.4 on Conflicting and Inaccurate Information.

PROCEDURE

If the school suspects that a student, employee, or other individual has misreported information and/or altered documentation to increase student aid eligibility or to fraudulently obtain federal funds, it must report those suspicions and provide any evidence to ED’s Office of Inspector General (OIG). Refer to Section 15 (Title IV Fraud) for more information.

3.1.2.9 REVIEWS & PROCEEDINGS

POLICY

To demonstrate administrative capability, CT State must show no evidence of significant problems that affect the institution's ability to administer a Title IV program, as identified in:

- Reviews, assessments, and audits conducted by ED, the New England Commission of Higher Education, or the State of Connecticut
- Findings made in any criminal, civil, or administrative proceeding.

The institution must not be debarred, suspended, or engaged in any activity that is cause for debarment or suspension and must not have any principal or affiliate of the institution that is debarred, suspended, or engaged in any activity that is a cause for debarment or suspension.

PROCEDURE

As a public institution of higher education, CT State falls under a state auditing process by which the State of Connecticut's Auditors of Public Accounts (APA) reviews sample students within various audit tests. APA follows up on prior year audit findings to ensure there are no repeat findings. All APA Audit Reports for CT State and legacy community colleges are part of Connecticut's Statewide Single Audit.

Historical audit reports are publicly available: <https://wp.cga.ct.gov/apa/audits/reports/>

All financial statement reports are publicly available: <https://www.ct.edu/finance#documents>

Program reviews and ED communications are sent to the College, NECHE, and BOR Chair. Documents are reviewed by the appropriate BOR committee and discussed/adopted formally at board meetings.

Board agendas and minutes, which would include these documents, are publicly available:

<https://www.ct.edu/regents/meetings>

3.1.2.10 COHORT DEFAULT RATES

POLICY

CT State participates in the Federal Direct Student Loan Program and employs default management measures to assist in mitigating high cohort default rates.

PROCEDURE

None of the legacy colleges have had an ED default prevention plan imposed upon them. All the institutions direct students to complete the ED-administered Entrance Counseling online. All schools require first-time borrowers to do electronic Entrance Loan Counseling and complete a Master Promissory Note. Returning borrowers are not required to do Entrance Loan Counseling, and valid Master Promissory Notes are good for ten years. Returning borrowers are only required to complete a Master Promissory Note if the original note has expired.

CT State contracts with ECMC to assist with their default prevention strategies. This includes the use of a financial literacy platform, annual debt letters, and loan counseling for students in grace and approaching default, as needed.

Official Cohort Default Rates are available at <https://nsldsfa.ed.gov/cdr-searchable-database/school/search>.

College Name	OPE-ID	FY19 CDR
Asnuntuck Community College	011150-00	3.1
Capital Community College	007635-00	1.6
Gateway Community College	008037-00	2.6
Housatonic Community College	004513-00	3.2
Manchester Community College	001392-00	0.7
Middlesex Community College	008038-00	2.2
Naugatuck Valley Community College	006982-00	4.7
Northwestern CT Community College	001398-00	2.9
Norwalk Community College	001399-00	2.4
Quinebaug Valley Community College	010530-00	N/A
Three Rivers Community College	009765-00	0.7
Tunxis Community College	009764-00	4.2

The national average FY19 CDR for public two-year colleges is 3.5%.

3.1.3 FINANCIAL RESPONSIBILITY

All institutions are in good standing with NECHE, which has nine accreditation standards for evaluation. Standard Seven (Institutional Resources) includes Section 7.4 to 7.20 on Financial Resources. If NECHE had determined any of legacy community colleges had not met accreditation financial standards, this information would be reported to the US Department of Education.

3.1.4 REPORTING & RECONCILIATION

The College must provide all program reports, fiscal reports, and financial statements required for compliance with Title IV program provisions. It must also continuously reconcile the Title IV programs in which it participates on at least a monthly basis.

3.1.4.1 FISCAL OPERATIONS REPORT AND APPLICATION TO PARTICIPATE (FISAP)

POLICY

Each legacy community college completes and submits their own FISAP. The central office staff provides the means to generate information needed to complete the FISAP through the Banner student information system. CT State will complete a single FISAP that encompasses all campus locations.

PROCEDURE

The following steps are taken to prepare for and submit the FISAP:

PART I: IDENTIFYING INFORMATION, CERTIFICATION AND WARNING

Section A: Identifying Information

- Check to make sure the institution name, institution address, OPEID, type of school, length/type of longest program information of the institution is correct as this information is usually pre-populated.
- Determine if any additional information needs to be provided.
- Check to make sure the Financial Aid Administrator information is correct.
- Provide the name and address of any private financial aid consultant firm if any is used for the processing of aid.

Section B: Certification and Warning

- Make sure of the accuracy of the name and other information for the Chief Executive Officer.
- This individual is who will sign off on the completed report when it is finished and submitted.

PART II: APPLICATION TO PARTICIPATE

Section A: Request for Funds for the Award Year

- Determine appropriate amounts to request for Federal Supplemental Educational Opportunity Grant and Federal Work Study allocations.

Section B: Federal Perkins Loan Program Liquidation Request

- Disregard

Section C: Waiver Request for the Underuse of Funds

- Complete this section if funds were unexpended for the aid year, and this request needs to be made.

Section D: Information on Enrollment

- Indicate if the institution follows a traditional or non-traditional calendar.
- Provide information on enrollment for the year. This information is obtained from the Institutional Research Office.

Section E: Assessments and Expenditures

- Report the total tuition and fees collected for the year. This information is obtained from the Finance Office.
- Report the total amount of Federal Pell expenditures for the aid year.
- Report the total amount of state grants and scholarship expenditures for the aid year.

Section F: Information on Eligible Aid Applicants Enrolled for Award Year

Run the RORFSxx process from the Student Information System to retrieve the information for this section.

PART III: FEDERAL PERKINS LOAN PROGRAM FISCAL OPERATIONS REPORT

Disregard this section.

PART IV: FSEOG PROGRAM FISCAL OPERATIONS REPORT

Section A: Federal Funds Authorized for FSEOG

- Finalize the adjusted FSEOG authorization for the aid year.

Section B: Federal Funds Available for FSEOG Expenditures

1. FWS funds transferred to and spent in FSEOG
2. Federal Perkins Federal Capital Contribution funds transferred to and spent in FSEOG
3. FSEOG funds transferred to and spent in FWS.
4. FSEOG funds carried back and spent
5. Additional FSEOG funds carried back and spent for summer enrollment
6. Past year funds carried forward and spent in current year
7. Current year funds carried forward to be spent in next year
8. Current year funds carried back and spent in previous year
9. Additional current funds carried back and spent for previous summer enrollment
10. Total federal funds available for FSEOG

Section C: Funds to FSEOG Recipients

1. Total funds to FSEOG recipients
2. Non-federal share of funds to FSEOG recipients

Section D: Federal Funds Spent for FSEOG Program

1. Federal share of funds to FSEOG recipients
2. Administrative cost allowance claimed
3. Federal funds spent for FSEOG

Section E: Use of FSEOG Authorization

1. Expended FSEOG authorization
2. Unexpended FSEOG authorization

PART V: FEDERAL WORK-STUDY (FWS) PROGRAM FISCAL OPERATIONS REPORT

Section A: Federal Funds Authorized for FWS

1. Final adjusted FWS authorization

Section B: Federal Funds Available for FWS Expenditures

1. Federal Perkins Federal Capital Contribution funds transferred to and spent in FWS
2. FSEOG funds transferred to and spent in FWS
3. FWS funds transferred to and spent in FSEOG
4. Current year FWS funds carried back and spent in previous year.
5. Additional current year FWS funds carried back and spent for previous summer employment
6. Previous year funds carried forward and spent in the current year.
7. Current year funds carried forward to be spent in next year.
8. Current year funds carried back and spent in previous year.
9. Additional current year funds carried back and spent for previous summer employment
10. Total federal funds available for current year FWS

Section C: Total Compensation for FWS

1. Total earned compensation for FWS Program
2. Total institutional share of earned compensation

Section D: Funds Spent from Federal Share of FWS

1. Total federal share of FWS earned compensation
2. Administrative cost allowance claimed
3. Federal share of Job Location and Development (JLD) Program expenditures
4. Total federal funds spent for FWS

Section E: Use of FWS Authorization

1. Expended FWS authorization
2. Unexpended FWS authorization

Section F: Information about the Job Location and Development (JLD) Program

1. Disregard this section.

Section G: Information About FWS Students Employed in Community Service Activities

Request information from the department processing the FWS expenditures.

1. Number of students in community service employment
2. Federal share of community service earned compensation
3. Non-federal share of community service earned compensation

Section H: Information about FWS Students Employed as Reading Tutors of Children or Employed in Family Literacy Activities

1. Number of FWS students employed as reading tutors of children or employed in family literacy activities
2. Federal share of earned compensation for FWS students employed as reading tutors of children or employed in family literacy activities
3. Total earned compensation for FWS students employed as reading tutors of children or employed in family literacy activities

Section I: Information about FWS Students Employed as Mathematics Tutors of Children

1. Number of FWS students employed as mathematics tutors of children
2. Federal share of earned compensation for FWS students employed as mathematics tutors of children
3. Total earned compensation for FWS students employed as mathematics tutors of children

Section J: Information about FWS Students in Civic Education and Participation Activities

1. Number of students in civic education and participation activities
2. Federal share spent for students in civic education and participation activities.
3. Total spent for students in civic education and participation activities.

PART VI: PROGRAM SUMMARY THE FISCAL OPERATIONS REPORT

- Run the RORFSxx process in Banner to retrieve the information for this section.

3.1.4.2 NATIONAL STUDENT LOAN DATA SYSTEM

POLICY

The Registrar's Office/Enrollment Services completes enrollment reporting via the National Student Clearinghouse for the purposes of transmission to NSLDS. This is reported monthly.

PROCEDURE

The Registrar's Office/Enrollment Services reports enrollment information monthly to the National Student Clearinghouse (NSC). NSC sends back to the college error reports for those that must have corrections made. The Registrar works through the error reports and submits any corrections, as necessary.

The Registrar's Office/Enrollment Services is also responsible for reporting to NSLDS any ad hoc drop dates due to unofficial withdrawals or students "stopping out."

3.1.4.3 PROGRAM-SPECIFIC REPORTING

POLICY

Institutions generally begin sending origination records to COD during the early summer, as dictated by any required releases by Ellucian. Disbursement records are sent to COD beginning five (5) days in advance of the start of a payment period.

COD processes are run at least weekly beginning at the start of the payment period.

PROCEDURE

All institutions complete both internal and external reconciliation of federal funds both monthly and at the end of the academic year. Reconciliation will be done to compare the following:

- Financial Aid Totals (RFIBUDG)
- COD Totals
- General Ledger/Student Account Totals
- G5 Totals

In addition, the year-end reconciliation will also include totals included on the FISAP.

Both monthly and year-end reconciliation between the Financial Aid Office and Business Office records will be confirmed by representatives from each department. A common document evidencing the totals will be signed by the representatives. The reconciliation document plus any supporting evidence will be archived and accessible to either department. Any discrepancies will be notated with an explanation.

3.1.5 COPYRIGHT INFRINGEMENT AND PEER-TO-PEER FILE SHARING

POLICY

The BOR's policy on Student Code of Conduct includes copyright infringement (see 27(e) on page 12):

<https://www.ct.edu/files/policies/2.1%20StudentCodeofConduct.pdf>

PROCEDURE

CSCU provides a [Copyright Guide](#) to provide information to help CSCU faculty and staff understand copyright law and apply this understanding to exercise their rights to make academic use of materials.

3.2 GENERAL TITLE IV STUDENT ELIGIBILITY REQUIREMENTS

POLICY

CT State ensures all students receiving federal funds meet the following general student eligibility criteria:

- Be enrolled as a regular student in an eligible program
- Not be enrolled simultaneously in elementary or secondary school
- Meet one of the following academic criteria:
 - Have a valid high school diploma
 - Have the recognized equivalent of a high school diploma, including:
 - A General Education Development Certificate (GED)
 - A state certificate issued after passing a state-authorized test, recognized by the state as the equivalent of a high school diploma
 - An academic transcript indicating the successful completion of a two-year program in which all credits apply towards fulfilling bachelor's degree requirements
 - Documentation indicating a student seeking to enroll in a program that leads to at least an associate degree – but did not complete high school graduation requirements – excelled academically in high school and meets admissions requirements as indicated in formal, written admissions policies

- For students enrolled prior to July 1, 2012 and for students enrolled in an eligible career pathway program on or after July 1, 2014, meet one of the following ability-to-benefit (ATB) alternatives:
 - Have a passing score on an independently administered, ED-approved ATB test
 - Complete at least 6 credit hours or 225 clock hours that apply directly toward the student's current academic program
 - Complete a state process approved by ED if/when one is approved
 - Be home schooled, and
 - Obtain a secondary school completion credential for home schooling provided by the student's home state, if one is offered, or
 - Have completed a secondary school education in a home school setting that qualifies as an exemption from compulsory attendance requirements under state law
- Have a valid Social Security Number, if required
- Be a U.S. citizen or eligible noncitizen
- Be registered with Selective Service, if required
- Sign a Statement of Educational Purpose, which certifies he or she will use federal student financial aid only to pay educational costs
- Not be in default on a Title IV loan or, if in default, have made satisfactory repayment arrangements with the loan holder
- Have not obtained loan amounts that exceed annual or aggregate loan limits made under any Title IV loan program
- Not be liable for an overpayment of a Title IV grant or Federal Perkins Loan, or if liable, have made satisfactory repayment arrangements with the holder of the debt
- Be making satisfactory academic progress (SAP)
- Not have property which is subject to a judgment lien for a debt owed to the U.S., or if subject to a judgment lien, have made satisfactory repayment arrangements with the debt holder
- Not have been convicted of an offense involving the possession or sale of illegal drugs that occurred while the student was enrolled and receiving Title IV aid
- Have completed repayment of funds to either ED or the holder of a loan, as applicable, if the student has been convicted of, or pled nolo contendere or guilty to, a crime involving fraud in obtaining Title IV aid.

Students are awarded based on estimated full-time enrollment. Federal Pell Grants, in addition to other financial aid awards as appropriate, are recalculated as of the determined census date for each payment period.

PROCEDURE

CT State utilizes Banner as its student information system. Most of the eligibility requirements related to Title IV are hard coded into Banner by default. Other eligibility requirements are checked during the verification process. The institutions use Inceptia to verify federal aid applications. "C" code issues are addressed by the financial aid staff members at each individual institution.

3.3 FEDERAL AID PROGRAMS

POLICY

CT State participates in all federal student aid programs, except the TEACH program. CT State awards all sources of federal funding within designated regulatory requirements.

PROCEDURE

The College uses Banner to facilitate the delivery of federal student aid, much of which is pre-programmed to adhere to federal requirements.

CT State publishes its Financial Aid Guide for students, which details information about participation in the federal aid programs. The Guide is located at <https://www.ct.edu/admission/finaidguide>.

Refer to Section 9 (Packaging Financial Aid) for specific fund-related information.

3.3.1 FEDERAL WORK-STUDY PROGRAM

POLICY

The Federal Work-Study Program provides part-time employment to students attending institutions of higher education who need the earnings to help meet their costs of postsecondary education. This campus-based program and encourages students receiving FWS assistance to participate in community service activities.

PROCEDURE

In development

3.3.1.1 GENERAL EMPLOYMENT CONDITIONS AND LIMITATIONS

POLICY

Refer to Section 3.3.1.

PROCEDURE

Refer to Section 3.3.1.

3.3.1.2 FEDERAL SHARE LIMITATIONS

POLICY

Capital, Gateway, Housatonic, Naugatuck, and Norwalk Community Colleges have a Title III designation. As such, none are required to provide a 25% match to federal funds. All other colleges provide a 25% institutional share. It has yet to be determined if CT State qualifies with a Title III designation.

PROCEDURE

Any applicable institutional shares are supplied by the college's tuition set-aside program (institutional aid).

3.3.1.3 FISCAL PROCEDURES AND RECORDKEEPING

POLICY

In development

PROCEDURE

All colleges manage FWS funds, approve the award amounts, and reconcile the funds at the end of the Award Year. Career Services posts the jobs that are available to students. Delivery of the FWS funds will be handled by the Payroll Department. Paid amounts are available within the Banner financial aid module for reconciliation purposes.

Refer to Section 2.5 for additional information on record management and retention.

3.3.1.4 JOB LOCATION AND DEVELOPMENT PROGRAM

POLICY

CT State does not participate in the Job Location and Development Programs.

PROCEDURE

Not applicable.

3.4 STATE AID PROGRAMS

POLICY

The Roberta B. Willis Scholarship Program is available to Connecticut residents attending at least half-time, as administered by the Connecticut Office of Higher Education. This program is enacted under Connecticut General Statute 10a-173.

Effective with the Fall 2020 semester and in accordance with Public Act 19-117 (sections 362-364), the Board of Regents administers the Pledge to Advance Connecticut (PACT) program, a last-dollar funding initiative for eligible students to defray the costs of tuition and fees after other sources of financial aid have been applied.

PROCEDURE

Refer to Section 9 (Packaging Financial Aid) for additional information.

3.4.1 THE ROBERTA B. WILLIS SCHOLARSHIP PROGRAM

The Roberta B. Willis Scholarship Program is administered by the CT Office of Higher Education. This program, enacted under CGS 10a-173, contains both a Need-Merit and Need-Based component. OHE annually distributes a Student Financial Aid Handbook to participating institutions to ensure program components are considered in the award-making process.

Refer to the OHE Student Financial Aid Handbook for additional program details.

<http://www.commnet.edu/finaid/Documents/2020-21%20Student%20Financial%20Aid%20Handbook.pdf>

3.4.2 THE PLEDGE TO ADVANCE CONNECTICUT (PACT) PROGRAM

The PACT program is administered within CT State and was enacted under Public Act 19-117. On December 19, 2019, the BOR adopted a Manual to assist in the administration of the program in accordance with the relevant state law.

Refer to the BOR PACT Manual for additional program details.

BOR PACT Manual: <https://www.ct.edu/files/pdfs/pact%20manual.pdf>

PACT Procedural Guide: <http://www.comnet.edu/finaid/Documents/PACT%20Procedure.pdf>

3.5 INSTITUTIONAL AID PROGRAMS

POLICY

Institutional aid, more commonly known as the tuition set-aside program, is available to supplement the aid packages of Connecticut residents who demonstrate financial need. This fund is subject to Connecticut General Statute 10a-77(f) and any subsequent BOR action applicable to the use of this fund.

PROCEDURE

On April 15, 2015, the BOR affirmed (BR 15-035) a prior policy which designates a minimum of 15% of net tuition revenues to be utilized for this program. Board policy also affirms that recipients must be Connecticut residents.

Those students that are ineligible to complete a FAFSA may also have access to this fund, but must complete a separate application, the Aid Application for CT Undocumented Students (AACTUS).

3.5.1 FOUNDATION AWARDS

All foundation awards are made at the discretion of the affiliated campus foundation and are considered estimated financial assistance for students.

3.6 OTHER AID PROGRAMS

POLICY

Other educational resources are also considered within a student's financial aid package and depending up on the type and amount may impact any need-based federal aid. Defaults set within the Banner system prevent over-awards of need-based aid. However, if an additional resource is added outside of the auto-packaging process an over-award may occur and would require resolution.

PROCEDURE

Staff utilize use a monitoring report (RORCALC) to learn of any possible over-award situations which need to be addressed. The information from this report shows third-party resources that have been credited to the student's account by another department.

Additionally, the Potential Overaward Report (RWPOVRAD) report is available to identify both need and cost of attendance over awards within a single payment period.

3.6.1 VOCATIONAL REHABILITATION PROGRAM

Each institution's finance office (e.g., Bursar) handles Vocational Rehabilitation Benefits and other sources of aid, crediting to the student account and then identifying this as a resource for the financial aid office.

Institutions may use the Professional Judgment process to add any educationally related disability expenses to a student's Cost of Attendance.

SECTION 4: INSTITUTIONAL REQUIREMENTS RELATING TO EDUCATIONAL LOANS

4.1 PRIVATE EDUCATION LOAN DISCLOSURES

POLICY

When an institution processes a private educational loan, the required disclosure information under section 128(e)(11) of the Truth in Lending Act (TILA) is provided to the borrower. The disclosure informs the borrower they may qualify for loans or other assistance under Title IV program under which the terms and conditions of loans under the Title IV programs may be more favorable than those of private education loans.

CT State does not promote private educational loans. Therefore, no Code of Conduct is provided to consumers. The Financial Aid Office does have an office policy with a code of conduct regarding private educational loans. This Code of Conduct was voluntarily adopted in 2007 at the recommendation of Connecticut's Attorney General. The BOR formally adopted the code in 2017.

The Financial Aid Policy for CSCU Community Colleges, which contains the Code of Conduct, is located at: <https://www.ct.edu/files/policies/5.9%20Financial%20Aid%20Policy%20Philosophy%20Code%20of%20Conduct%20Community%20Colleges.pdf>

PROCEDURE

Loan originations from private lenders are received by the institutions in a variety of ways. Primarily, students find a lender and initiate the completion of a private loan application. The lender then either emails or mail by U.S. Postal Service a certification form.

When a request for certification is received, the Financial Aid Office checks to see if the student is enrolled, whether the student should be counseled on federal aid availability if they may be eligible, and if there is room in the student's Cost of Attendance.

If the loan can be certified, the loan certification form is completed for the student and disbursement dates are set according to the student's course schedule.

The student's Cost of Attendance may be adjusted to make sure the loan period is correct.

The loan certification form is then submitted to the lender either electronically or through postal mail.

The loan funds are then entered into RPAARSC with the scheduled disbursement dates.

Once the loan is certified and entered into Banner, the student is sent the required loan disclosure. This notification is then logged into RUAMAIL.

When the funds are received by ACH, the Business Office alerts the Financial Aid Office. The funds are then transmitted to the student's account. The Business Office then reviews the account and processes a refund to the student if the funds exceed the student's direct charges.

4.2 PREFERRED LENDER ARRANGEMENTS

CT State does not have any preferred lender arrangements or preferred lender lists that are disseminated to students. As such, there is no preferred lender arrangement annual report to create and distribute. CT State does not market private education loans to its students.

4.3 PRIVATE EDUCATION LOAN APPLICANT SELF-CERTIFICATION FORM

POLICY

As part of the TILA requirements, all private loan borrowers must complete a Self-Certification Form and provide this document to the lender.

PROCEDURE

When CT State provides the required private loan disclosure information, a self-certification form is sent to the student to be completed and it is the responsibility of the borrower to submit the completed form to the lender.

4.4 DIRECT LOAN DISCLOSURES

At the time this manual was finalized, ED had not yet implemented the model disclosure form for schools participating in the Direct Loan Program.

SECTION 5: STUDENT CONSUMER INFORMATION REQUIREMENTS

While many consumer information requirements must be provided directly to students, CT State maintains this information through its Student Right to Know webpage at <https://ctstate.edu/consumer-information>.

5.1 FEDERAL STUDENT CONSUMER INFORMATION REQUIREMENTS

The Associate Vice President for Enrollment and Retention Services maintains oversight of the consumer information requirements and dissemination as required.

5.1.1 NOTICE TO ENROLLED STUDENTS

POLICY

Required consumer information disclosures are disseminated to enrolled students by way of direct email from the College, which includes information on how to obtain paper copies of these disclosures. This is done on at least an annual basis.

PROCEDURE

The following disclosures are subject to dissemination by the Associate Vice President for Enrollment and Retention Services, or designee.

- Rights under the Family Educational Rights and Privacy Act (FERPA)
- Contact information for assistance in obtaining financial aid
- information for individuals with disabilities
- Financial assistance available to students enrolled at the institution
- Student body diversity
- Price of attendance and Net Price Calculator
- Refund Policy, Withdrawal Policy, and Return of Title IV Funds Policy
- Academic programs
- Faculty, staff, and instructional facilities
- Transfer of credit/Articulation policies
- Institutional and program accreditation, approval, or licensure
- Annual campus security report
- Copyright infringement policies and sanctions (including computer use and file sharing)
- Vaccination policy
- Retention rate as reported to the Integrated Postsecondary Education Data System (IPEDS)
- Graduation and completion date, and if required, transfer-out rate

5.1.2 FINANCIAL AID INFORMATION

POLICY

CT State participates in the Federal Pell Grant Program, Federal Supplemental Educational Opportunity Grant Program, Federal Direct Loan Programs, Federal Work-Study Program, Federal Iraq and Afghanistan Service Grant Program, the State of Connecticut Scholarship and Grant Programs, various college-based grant programs, and administer private loans for their students. This information is published in multiple places and is readily available to all current and prospective students, including:

- CT State Financial Aid Webpage (<https://ctstate.edu/financial-aid>)
- CT State Financial Aid Guidebook (<https://www.ct.edu/admission/finaidguide>)

PROCEDURE

The Associate Vice President for Financial Aid Services and Title IV Compliance is responsible for the ongoing review and update of all consumer information requirements directly related to financial aid, including where it is published, accuracy, and timeliness of the information provided.

A description of all available financial aid programs (including both need-based and non-need-based programs) including student eligibility requirements is included in Section 3 (Financial Aid Programs) of this manual. For the application procedures and forms to apply, refer to Section 6 (Applications and Forms). For the criteria for selecting recipients and for determining aid amounts, refer to Section 9 (Packaging Financial Aid).

The terms and conditions for Federal Direct Loans, Federal Work-Study, and other types of aid are described in Section 3 (Financial Aid Programs) of this manual.

The rights and responsibilities of student aid recipients including criteria for continued eligibility and the Satisfactory Academic Progress standards described in Sections 3.2 (General Title IV Student Eligibility Requirements), Section 7 (File Review and Verification, which includes multiple eligibility requirements such as database matches and comment code resolution), and Section 12 (Satisfactory Academic Progress).

5.1.3 INSTITUTIONAL INFORMATION

POLICY

The Associate Vice President for Enrollment and Retention Services is accountable for the ongoing review and update of all consumer information requirements in every location where it is published, and for ensuring the accuracy and timeliness of the information provided.

This information is provided within the CT State Student Handbook, as well as the CT State Student Right to Know webpage.

PROCEDURE

The college makes certain information about their respective campus is readily available upon request to enrolled and prospective students. These disclosures are prepared, maintained, and disseminated as required by federal law. They include:

- The student's rights under the Family Educational Rights and Privacy Act (FERPA)
- Information for Individuals with Disabilities
- Student Body Diversity
- Price/Cost of Attendance
- Refund Policy, Withdrawal Policy, and Return of Title IV Funds Policy
- Academic Programs, Faculty, Staff, and Instructional Facilities
- Transfer of Credit / Articulation Policies
- Institutional and Program Accreditation, Approval or Licensure
- Required Textbook Information

5.1.4 COMPLETION OR GRADUATION RATE

POLICY

The Associate Vice President of Institutional Effectiveness and Planning is responsible for the determination of the college's completion or graduation rate and transfer-out rate and must make these rates available to enrolled or prospective students through appropriate publications, mailings, or electronic media.

PROCEDURE

The calculated rates are published within the CT State Student Right to Know webpage.

5.1.5 ANNUAL SECURITY REPORT

POLICY

CT State distributes an annual security report, including crime statistics, campus policies, and procedures regarding security matters, to enrolled students and current employees by email. The responsible position for the collection and dissemination of this information is the Chief of Police/Director of Public Safety.

PROCEDURE

The institution must also ensure prospective students and prospective employees are informed of the availability of the report and given an opportunity to obtain it. The statistics portion of the report is also be submitted to the U.S. Department of Education, as required.

5.1.5.1 TIMELY WARNINGS AND EMERGENCY NOTIFICATIONS

POLICY

The Chief of Police/Director of Public Safety is responsible for distributing timely warnings and directing emergency notifications to students and staff of the college.

PROCEDURE

NOTIFICATION OF AN EMERGENCY ON CAMPUS

There are a variety of methods and tools available to notify the college community about an emergency on campus. These include:

- The fire alarm horns and public address system
- The telephone emergency paging system
- Text messaging with myCommNet Alerts.
- The college email system
- The college homepage and college police homepage
- Hard-copy postings on doors and bulletin boards and on campus monitors
- Bull horns and cruiser public address system
- Person-to-person contact by Emergency Response Team members
- Various radio and television stations

TYPES OF EMERGENCY NOTIFICATIONS

- Emergency Evacuation
- Non-Evacuation Emergency
- Shelter-In-Place
- Armed Hostile Intruder
- Crime Alert Timely Warning

5.1.5.2 CAMPUS CRIME LOG

POLICY

CT State is required to maintain and make available a daily crime log, as well as a responsible party for making sure the log is available within each campus location.

PROCEDURE

All crime logs are available upon request.

5.1.6 STUDENT-ATHLETE COMPLETION OR GRADUATION RATE

CT State does not administer athletic aid, and therefore this is not a required disclosure.

5.1.7 ATHLETIC PROGRAM PARTICIPATION AND FINANCIAL SUPPORT REPORT

CT State does not administer athletic aid, and therefore this is not a required disclosure.

5.1.8 ANNUAL FIRE SAFETY REPORT AND FIRE LOG

CT State does not provide on-campus housing, and therefore this is not a required disclosure.

5.1.9 OTHER GENERAL DISCLOSURES

POLICY

CT State provides retention rates and other general disclosures to students, staff, and the public.

CT State does not prepare placement rates for any of their programs, nor are they required to provide employment and/or graduation rates for any programs. The college does not use placement rates or promises of employment in any publications or advertising.

PROCEDURE

This information is available on the CT State's Consumer Information webpage: <https://ctstate.edu/consumer-information>.

5.1.10 DRUG AND ALCOHOL ABUSE PREVENTION INFORMATION

POLICY

CT State provides a drug and alcohol abuse prevention program, which is provided annually and in writing to all students and employees via email. This information is also provided to each new student upon enrollment as a separate conspicuous written notice with information on the penalties associated with federal and state convictions for the sale or possession of illegal drugs by students.

PROCEDURE

This information is available on the CT State Student Right to Know webpage.

5.1.11 VOTER REGISTRATION INFORMATION

POLICY

As required under the National Voter Registration Act of 1993, CT State is required to make a good faith effort to distribute voter registration forms to their students, and to make the voter registration forms widely available to its students. It must individually distribute the forms to its Title IV-eligible degree and certificate-seeking students.

PROCEDURE

This information is available on the CT State Student Right to Know webpage.

5.1.12 PEER-TO-PEER FILE SHARING

POLICY

CT State makes information readily available to enrolled students regarding institutional policies related to unauthorized peer-to-peer file sharing, including disciplinary actions that are taken against students who engage in illegal downloading or unauthorized distribution of copyrighted materials using the institution's information technology system. They also provide legal alternatives for downloading or otherwise acquiring copyrighted material and provide enrolled students with a brief description of its policy with respect to unauthorized peer-to-peer file sharing in the annual notice to students containing the list of consumer information it must disclose and the procedures for obtaining this consumer information.

PROCEDURE

The College Catalog and Student Handbook detail information related to peer-to-peer file sharing.

5.1.13 ARRANGEMENTS WITH FINANCIAL ACCOUNT PROVIDERS (TIER 1 AND 2 ARRANGEMENTS)

The college has not entered into a Tier 1 or Tier 2 arrangement. CT State administers its own credit balance refunds to students.

5.2 STATE-REQUIRED CONSUMER INFORMATION

Effective July 1, 2014, institutions in the State of Connecticut are required to utilize the Shopping Sheet for providing uniform financial aid information to current and prospective students as required under Public Act 13-95, shown below:

"Section 1. (NEW) (Effective July 1, 2014) Each institution of higher education, as defined in section 10a-55 of the general statutes, and for-profit institution of higher education licensed to operate in this state shall provide uniform financial aid information to every prospective student who has been accepted for admission to such institution. Each institution shall provide such information prior to such institution's enrollment deadline for purposes of providing each student with sufficient time to make an informed decision about enrollment. Each institution shall use the financial aid shopping sheet developed by the Consumer Financial Protection Bureau and the United States Department of Education pursuant to the Higher Education Opportunity Act, P. L. 110-315, to provide such information."

The College Financing Plan (formerly known as the Federal Shopping Sheet) is made available to students through Self-Service Banner as both a printable PDF and a unique web link for student use.

5.3 ACCREDITING AGENCY CONSUMER INFORMATION

CT State does not have any consumer information requirements imposed by its accreditors.

5.4 TITLE IV LOAN COUNSELING

5.4.1 ENTRANCE COUNSELING

POLICY

Prior to receiving the first disbursement of a Direct Subsidized Loan or Direct Unsubsidized Loan, the student must undergo Entrance Counseling unless the student has received a prior Direct Subsidized Loan, Direct Unsubsidized Loan, Federal Stafford Loan, or Federal Supplemental Loan for Students (SLS).

The colleges use Banner to direct students to studentaid.gov to complete Entrance Counseling.

PROCEDURE

The college administers Entrance Counseling to students by providing a tracking requirement in Banner Self-Service that directs students to studentaid.gov. Completed Entrance Counseling files are downloaded and matched to student records in Banner when available. Entrance Counseling is required for new borrowers prior to their first disbursement of a Direct Loan.

Campus Supervisors is responsible for gathering, maintaining, and disseminating any required loan information to borrowers at their institutions. Information requirements are reviewed annually and updated accordingly.

5.4.2 EXIT COUNSELING

POLICY

Students who withdraw, graduate, or fall below half-time enrollment are required to complete Exit Counseling within 30 days of the designated activity.

PROCEDURE

The institutions utilize Banner to produce a report (RRREXIT) that defines the population of students eligible to complete the exit loan requirement when designated as withdrawn, graduated, or with less than half-time enrollment. A tracking requirement is added to the student's record in Banner Self-Service, and the student is provided instructions on how to complete the requirement through studentaid.gov. Completed exit counseling files are downloaded and matched to student records in Banner when available.

Students may be additionally notified of the requirement by postal mail or by messaging to their college email address.

Campus Supervisors responsible for gathering, maintaining, and disseminating any required loan information to borrowers at their institutions. Information requirements are reviewed annually and updated accordingly.

5.5 TEACHER EDUCATION ASSISTANCE FOR COLLEGE AND HIGHER EDUCATION GRANT COUNSELING

CT State does not participate in the TEACH Grant program.

SECTION 6: APPLICATIONS AND FORMS

6.1 APPLICATION PROCESS

POLICY

To be considered for federal financial aid, CT State students must complete a [Free Application for Federal Student Aid](#) (FAFSA). The FAFSA form collects financial and other information used to calculate the expected family contribution (EFC). It also determines a student's overall eligibility based on data matches with other federal agencies.

First time filers must create an FSA ID. The FSA ID allows students and parents to access Federal Student Aid's online system. Dependent students and parents of dependent students need to apply for their own separate FSA ID. Independent students need to apply for their own FSA ID as well. The FSA ID serves as a pin number, a signature, and is also used when accessing the online Federal Student Aid website.

The FAFSA application opens October 1st of each year (unless otherwise noted by ED) for the following academic year and can be completed online at <https://studentaid.gov/h/apply-for-aid/fafsa>. It can also be completed via the myStudentAid mobile app featuring myFAFSA. Applicants can find the app in the app store on their mobile device. Students who have limited access to the internet may complete a FAFSA via the phone at 1-800-433-3243. They will receive a paper Student Aid Report (SAR) that needs to be signed by both the student (and parent for dependent students) and returned to the central processor at the address provided on the form. The student is emailed a Student Aid Report (SAR) detailing the data they input. The school electronically receives an Institutional Student Information Record (ISIR).

To be considered for federal financial aid at CT State, a student must minimally:

- Be accepted for admission to the college and enrolled in a degree or eligible certificate program.
- Have a high school diploma, GED, or recognized equivalent.
- Be a U.S. citizen with a valid Social Security number or be an eligible non-citizen with a valid alien registration number.
- Complete the FAFSA or Renewal Application for the correct academic year.
- Have a clean NSLDS record.
- Maintain Satisfactory Academic Progress as stated in the Student Handbook.
- Provide any other documents requested by the Financial Aid Office for completion of the student's financial aid file.

It is the responsibility of the student to provide information, documentation, forms, and signed documents in a timely manner when requested to do so. Failure to follow through with such requests will result in the delay of the financial aid process and/or eligibility of the financial aid program.

When completing the FAFSA, students must use the Federal School Code 007635. Note that this is the Federal School Code of Capital Community College that will transition into CT State. Until the merger of CT State is completed by the US Department of Education, each of the legacy community college Federal School Codes still appear in the FAFSA lookup. Students who identify any of the legacy community colleges on their FAFSA are contacted and asked to update their application to include the 007635 code so that their financial aid may be

processed accordingly. To assist CT State and its students in making sure we receive each student's financial aid application, we have engaged Inceptia to provide outbound email and phone outreach for impacted students.

The Federal School Codes of the legacy community colleges are:

College Name	Federal School Code
Asnuntuck Community College	011150
Capital Community College/CT State	007635
Gateway Community College	008037
Housatonic Community College	004513
Manchester Community College	001392
Middlesex Community College	008038
Naugatuck Valley Community College	006982
Northwestern CT Community College	001398
Norwalk Community College	001399
Quinebaug Valley Community College	010530
Three Rivers Community College	009765
Tunxis Community College	009764

The financial aid offices located among the campuses of CT State provide guidance and assistance to prospective, new, and continuing students concerning the financial aid application process. They answer questions and assist with completing the FAFSA.

The colleges provide general application and eligibility information in the Student Handbook and on the individual schools' financial aid website. New and prospective students receive FAFSA information upon acceptance. Current students receive multiple email reminders to renew their FAFSA for the upcoming school year. CT State additionally supports 10 on-ground locations for the Connecticut Talent Assistance Cooperative ([CONNTAC](#)), a TRIO Program, which provides FAFSA assistance to economically disadvantaged students. Each location supports one full-time staff.

AID APPLICATION FOR UNDOCUMENTED CT STUDENTS (AACTUS)

Under Connecticut Public Act 18-2, undocumented students who are Connecticut residents (eligible for in-state tuition) are eligible for institutional financial aid funding by way of completing the Aid Application for Undocumented CT Students (AACTUS). Information on the AACTUS, including the paper application, is available on [Connecticut State Community College's Financial Aid website](#), as well as each community college's website.

To be considered for institutional financial aid as an undocumented student under the law, a student must meet certain age, residency, and criminal history requirements in addition to signing an affidavit of eligibility. It must be signed in front of a Notary Public and submitted to the financial aid office via mail, fax, or hand delivered. Eligibility requirements and deadlines are as follows for two groups of eligible students:

Check the statements below if you are a Veteran student applying for aid:	Check the statements below if you are a student applying for aid:
<input type="checkbox"/> I am a CT resident.	<input type="checkbox"/> I am a CT resident.
<input type="checkbox"/> I am an honorably-discharged veteran of the armed forces of the United States and have attached my DD-214 (Certificate of Release or Discharge from Active Duty) to prove so.	<input type="checkbox"/> I was sixteen years of age or younger when I arrived in the United States and have continuously resided in the U.S. since such arrival.
<input type="checkbox"/> I was fifteen years of age or younger when I arrived in the United States and have continuously resided in the U.S. since such arrival.	<input type="checkbox"/> I was thirty years of age or younger on June 15, 2012 (birthdate 6/15/1982 or later).
<input type="checkbox"/> I was thirty years of age or younger on June 15, 2012 (birthdate 6/15/1982 or later).	<input type="checkbox"/> I completed high school level education in CT for at least two years.
<input type="checkbox"/> I completed high school level education in CT for at least two years.	<input type="checkbox"/> I graduated from high school in CT, or the equivalent thereof.
<input type="checkbox"/> I graduated from high school in CT, or the equivalent thereof.	<input type="checkbox"/> I have not been convicted of a felony in any state in the U.S.
<input type="checkbox"/> I have not been convicted of a felony in any state in the U.S.	<input type="checkbox"/> I am currently without legal immigration status but have filed an application to legalize my immigration status or will file such application as soon as I am eligible.
<input type="checkbox"/> I am currently without legal immigration status but have filed an application to legalize my immigration status or will file such application as soon as I am eligible.	

In addition, institutional aid may only be granted to students if they would have otherwise qualified for aid excepting their undocumented status. For example:

- All students must meet the same Satisfactory Academic Progress standards to receive aid
- Male students must register with Selective Service, if required
- Dependent students must supply parent information
- Dependency overrides may be possible per college policy and professional judgment
- Students and parents earning over that year's filing threshold must file an income tax return

PROCEDURE

The FAFSA application is completed online at the Federal Student Aid's website and sent to the Central Processing System (CPS) for processing. Once the CPS has run their checks (database matches, inconsistencies, and possible mistakes), Connecticut State Community Colleges have access to any ISIR records that have their school code. Connecticut State Community College Financial Aid Directors, or office designees, retrieve their ISIR records through EdConnect and deposit them to their PROD\Reports\EDE folder within the Protective Enclave three times per week at minimum. Nightly, a scheduled, automated process will scan this folder for any ISIR files within a given aid year and run dataload parts 1-3 to load the information into Banner. The technical staff within the CT State Community College Central Office maintains this automated process. In addition to uploading the ISIRs, this automated process checks for application completeness, federal verification selections, and C-Flags. The Banner jobs invoked during this process will batch post any requirements (verification, c-flag documentation, etc.) to each student's record within the Banner system. For those students who do not meet the matching criteria determined within the dataload process when compared with general person records (last name, birthday, birth month, birth year, social security number), their ISIR information is delivered into Banner's suspense tables for manual matching, or automated matching in some instances.

Campus staff use the Dataload Summary Report to manage new ISIR records that have been brought into the college. This daily summary report, delivered by award year, contains a list of each student's name and Banner ID, along with their assigned tracking, budgeting, and packaging group, as well as the student's EFC, gross need,

scheduled Pell Grant, and unmet need. Staff members will review the list on a daily basis and determine if the student is ready to be awarded or has an incomplete file.

In addition to the Dataload Summary Report, students whose first ISIR transaction is matched to an existing Banner ID will be emailed an indication that the college has received their FAFSA. This email also includes information on accessing their my.commnet.edu account. The dataload report will contain information on matched ISIRs to existing Banner IDs, non-matched ISIRs to students who may not have an existing Banner ID, and any discrepancies noted between subsequent ISIRs received for a student that college staff must review and resolve, if required. If the student has an incomplete file, the financial aid administrator will verify that the application process program added the correct missing item to the tracking screen and an electronic notification via my.commnet.edu is sent to the student. In addition, it is recommended individual colleges send a personal email or call the student. If the file is complete and ready to award, the staff member will either manually award the student or set the student up to be auto packaged. The student will be notified via my.commnet.edu when their financial aid award is ready for review.

Subsequent ISIRs are reviewed on a regular basis. Refer to Section 7.3 for the associated policy and procedure.

AACTUS

The AACTUS application is completed via a paper process. Students submit the AACTUS application directly to the school where it is date stamped, manually tracked in the Banner system (received then changed to reviewed) by a financial aid staff member, reviewed for accuracy, and then filed in the paper file.

When a student submits an AACTUS application to the office, the college shall enter a tracking requirement in RRAAREQ, marked as received with the applicable date, to note the receipt of the application (xAACTU, where "x" is replaced by the college code).

If the AACTUS application is incomplete, the financial aid staff member will update RRAAREQ with the appropriate code, make a note in the Banner system (on RHACOMM) and notify the student either via direct email, an additional tracking requirement within Self-Service Banner, or a personal phone call.

6.2 FORMS

POLICY

The financial aid office uses a common set of forms, and procedures for applying those forms, across all campus locations of the College. Each form is reviewed annually, at minimum, for any required changes.

PROCEDURE

All forms used by the CT State financial aid office are housed at <http://www.commnet.edu/finaid/forms.aspx>. These include, but are not limited to the following:

- Aid Application for CT Undocumented Students (AACTUS)
- Satisfactory Academic Progress Appeal Form
- Special Circumstances Form
- Loan Request Form
- Unusual Enrollment History Form
- Consortium Agreement Form
- PACT Appeal Form
- Verification Forms

Additional reference materials are located at http://www.commnet.edu/finaid/Reference_Materials.aspx.

CT State works with Inceptia to complete the verification process. Inceptia's Verification Gateway portal requires students (and a parent of dependent students) to create secure accounts, complete task lists associated with their verification requirements, and electronically sign their forms. Schools retain the option of completing the verification process directly with the student as opposed to working within the Verification Gateway. There are additional forms that Connecticut State Community Colleges use, which are listed below. Forms common to all institutions are maintained by the Central Office and are located on their website. Forms are updated annually, or more often as needed.

All forms are required to be logged in Banner using the RRAAREQ form for tracking requirement logging with an appropriate status. These documents and statuses are also visible to students within Self-Service Banner. Although students may hand-deliver forms to the office, students are encouraged to submit their forms electronically using <https://cscu.easy-forward.com>.

6.3 DEADLINES

POLICY

Students should pay close attention to the published deadlines for financial aid applications, processing, and awarding. In some cases, the deadline is a priority filing deadline and used as a tool to encourage students to complete the application process early so that they have access to all available funding options and their financial aid is awarded in a timely manner and prior to the bill being due. Other deadlines are set forth by federal regulation and no exceptions can be made for the awarding or processing of financial aid.

- The FAFSA application cycle is 21 months. For the 2023-2024 award year, applications are accepted beginning October 1, 2022 through June 30, 2024.
- **Priority filing deadlines:** Students who wish to have their financial aid in place as a payment method for courses before they begin should have their applications and all requested documents complete by the priority filing deadlines below. This includes the AACTUS application.
 - **Fall Semester: July 15**
 - **Spring Semester: November 15**
 - **Summer Session: April 1**
- Priority filing deadline for Connecticut State Community College Title IV campus-based funds is July 15 prior to the award year.
- Priority filing deadline to be considered for PACT funding is priority July 15 for Fall semesters, and priority deadline November 15 for Spring semesters.
- Requested verification documents must be submitted to Inceptia through their Verification Gateway portal, or the financial aid office if they selected the student for verification, within 30 days of the end of the term that the student was attending, or financial aid will not be calculated and awarded for that term. However, if the term is the summer semester, then the documents must be submitted prior to the end of the student's assigned academic year.
- Loan acceptance and requirements must be completed prior to December 1st for a Fall disbursement, May 1st for a spring disbursement and July 1st for a summer disbursement.
- Loans need to be certified by the end of the term for which they were attending at least half time.
- Foundation scholarship deadlines vary by fund and are listed on each institution's specific website.
- The Official Deadline Notice at the Federal Register for the 2023-2024 academic year has additional deadlines and information if needed.

PROCEDURE

Established priority deadlines are reviewed annually, with exceptions made as needed for extraordinary circumstances.

6.4 DOCUMENT ASSIGNMENT, COLLECTION, AND TRACKING

POLICY

Institutions are required to collect and retain certain documents for each student's financial aid application. The document assignment and processing system is set up through Banner.

Students (and parent(s) of a dependent student) must submit all documents related to verification to Inceptia. They do this through their Verification Gateway portal unless otherwise identified by the college to complete the verification process locally.

PROCEDURE

If the student has an outstanding tracking requirement, the financial aid administrator will verify that the application process program added the correct missing item to the tracking screen and an electronic notification via my.comment.edu is sent to the student. The student can log in to self-service and see what documentation is required in order to be awarded financial aid. In addition, some schools may send a personal email or call the student directly. Students will continue to receive weekly emails directing them to check my.comnet.edu for their missing requirements.

Students can submit all documents other than verification documents, including the Aid Application for CT Undocumented Students (AACTUS), directly to any CT State campus location via secure email, mail, walk-in, or fax. Institutions provide all students with a secure portal to upload outstanding documents: <https://cscu.easy-forward.com>.

All paper documents received by the financial aid office are date stamped, manually tracked in the Banner system by a financial aid staff member, reviewed for accuracy, and then filed in the paper file.

If a submitted document is incomplete, the financial aid staff member will update RRAAREQ with the appropriate code, make a note in the Banner system (on RHACOMM) and notify the student either via direct email, email through my.comment.edu, or a personal phone call.

6.5 PRE-PACKAGING APPEALS

POLICY

CT State allows students to request a professional judgment or review a special circumstance at any time.

PROCEDURE

Refer to Section 10 (Professional Judgment) for additional information on financial aid appeals.

SECTION 7: FILE REVIEW AND VERIFICATION

Reviewing a student's file often involves more than just the verification process. File review is used to ensure an applicant has met all of the required student and program eligibility criteria for which financial aid is offered. You may want to cross-reference the student eligibility and program eligibility sections of the manual. In addition to verification, the financial aid administrator must review an applicant's file for database matches, reject or C-codes, and other comment codes, edits, or flags that affect a student's eligibility for Title IV aid. The financial aid administrator also reviews a student's file for need analysis data elements not included in the federally required verification process but designated as necessary verification data elements by the school. Schools must also review subsequent Institutional Student Information Records (ISIRs) for changes that may affect the applicant's aid eligibility. For these reasons, verification is considered under the broader process of file review.

7.1 VERIFICATION

7.1.1 SELECTION OF APPLICANTS TO BE VERIFIED

POLICY

CT State contracts with Inceptia to communicate and complete the verification process for applicants that have been selected by the CPS (Central Processing System) for verification.

Inceptia seeks to verify 100% of all applications that have been selected for verification by the CPS. Under certain circumstances, financial aid administrators may verify a file in lieu of Inceptia. Financial aid administrators may select a student for verification if they discover discrepancies between known information and information included in the student's ISIR.

Institutions will exclude the following populations from verification, absent conflicting information (the entire application, including both student and parent data, may be excluded under the following circumstances):

- Applicants who die during the award year (regardless of conflicting information)
- Applicants who will not receive Title IV aid for reasons other than failure to complete verification
- Applicants who are only eligible to receive unsubsidized Title IV student financial assistance— Direct Unsubsidized Loans, parent or graduate PLUS Loans, Teacher Education Assistance for College and Higher Education (TEACH) Grants, and Iraq and Afghanistan Service Grants (IASGs)
- Applicants who are selected for verification after they are no longer enrolled, and all Title IV disbursements have been made (including late disbursements)

Parental data (but not student data) can be excluded from verification in the following circumstances:

- Dependent student's parents when both parents reside outside the United States and cannot be contacted by normal means of communication
- Applicant's parents when both parents cannot be located because their contact information is unknown
- Dependent applicant's parents when both parents are mentally incapacitated

An applicant's spousal information may be excluded when the spouse is deceased, mentally incapacitated, residing in a country other than the United States, and cannot be contacted by normal means, or the spouse's contact information is unknown.

Though possible by statute, the Connecticut State Community Colleges do not accept another school's previous verification for transfer students. For transfer students who have been selected for verification to be eligible for federal student aid, they must supply required documentation to the college via Inceptia.

PROCEDURE

Requirements related to verification are posted to student records in Banner during the nightly ISIR Dataload process. The designated FAA at each school sends email communications to student college email accounts, where students are directed to the my.comnet.edu portal to review outstanding requirements. If a student is selected for verification, the student will be assigned a tracking requirement that contains that college's unique URL to Inceptia's Verification Gateway (VG). Within VG, students (and one parent, if dependent) will be instructed to create a login to complete the verification process. In addition to emails, students may receive paper letters, telephone calls, personalized emails, and/or in person counseling about specific requirements and documentation needs directly from the college.

Should a student submit documentation directly to the college, or if the college self-selects the student to resolve conflicting information, the college retains the ability to complete the verification on-site and make corrections to the affected ISIR transaction, as needed. If this practice is employed, college staff must suspend the verification within VG, which will indicate to Inceptia that the college has completed the verification and the student no longer needs to be contacted.

Inceptia is notified via CPS of all students who were selected for verification within the institutions during the same timeframe as the school by drawing down duplicate ISIR transactions only for students who are selected for verification. After the initial email communication is sent out by the college, Inceptia continues to follow up and communicate directly with the student. Their timeline is listed in the chart below:

Communication	Audience	Frequency
Welcome & Create VG Account Email	Student and Parent (if dependent)	Sent once immediately after ISIR is loaded
Welcome & Create VG Account Postcard (English/Spanish)	Student: Sent only if there is no email address provided on the FAFSA	Mailed once via USPS immediately after ISIR is loaded
Reminder to Create VG Account Email	Student and Parent (if dependent)	Every 15 days, up to 10 attempts, or until the account is created
VG Account Created Email/Text	Student and Parent (if dependent)	Sent after the account is created
Incomplete Application Reminder Email/Text	Student and Parent (if dependent)	Sent every 15 days for up to 20 attempts or until further action is taken on the account
Pending Task List Item Expiration Reminder Email/Text	Student and Parent (if dependent)	Sent the day the item is set to expire
Task List Updated Email/Text	Student and Parent (if dependent)	Sent as needed
Reminder to E-Sign Account Email/Text	Student and Parent (if dependent)	Sent every 5 days up to 5 times after the task list is 100% complete and the e-sign process has not been completed
Task List Complete and Account is E-Signed	Student and Parent (if dependent)	Sent when the task list is complete and the account has been e-signed. This alerts the student/parent that the account is in review
Deadline Reminders Email/Text	Student and Parent (if dependent)	Sent 30, 15, and 5 days to final deadline
Verification Complete Email/Text	Student and Parent (if dependent)	Sent once verification is completed

7.1.2 ACCEPTABLE DOCUMENTATION AND FORMS

POLICY

Federal Verification

It is the responsibility of the student selected for verification to provide all acceptable documentation required to complete the review process. Requested documents must be submitted to Inceptia, or the financial aid office, within 30 days of the end of the term that the student was attending, or financial aid will not be calculated and awarded for that term. However, if the term is the summer semester, then the documents must be submitted prior to the end of the student's assigned academic year. Meeting this deadline does not guarantee awarding of financial aid. The Connecticut State Community Colleges maintain a priority deadline of July 15, as certain forms of aid are limited and distributed on a first-come, first-served basis. In addition, certain forms of aid must be originated by deadlines related to student enrollment (e.g., Pell Grant within 120 days of the student's last day of enrollment and Direct Loans by the last day of classes for the term for the loan period). It is CT State policy that verification must be completed prior to packaging any Title IV aid, and prior to Title IV aid being originated in COD and/or disbursed to the student.

Acceptable documentation includes at a minimum:

- The applicable verification worksheet must be completed accurately and legibly.
- Official Internal Revenue Service (IRS) tax transcripts, unaltered data transferred to FAFSA on the Web using the IRS Data Retrieval Tool, and alternative documents (such as Tax Return Database View transcripts for victims of identity theft and 1040X tax returns for amended tax filers). Signed tax returns are accepted if all other options are unavailable.
- Non-tax filers who report income earned from work will be required to provide W-2's and also the IRS non-filing letter dated on or after October 1 of the corresponding tax year.
- Signed statement concerning any untaxed income or benefits (e.g., statement confirming child support paid/received; all untaxed income reported on US individual tax returns, excluding schedules; W-2 forms for contributions to retirement plans; etc.)
- Signed statement concerning household size.
- Signed statement concerning number enrolled at least half time in an accredited post-secondary school.
- Signatures are required for students and parents (as applicable) on the verification worksheet.

CT State will accept all documentation outlined by ED under the applicable Federal Register notice and corresponding Dear Colleague Letter that outlines the data elements and documents required for this process.

PROCEDURE

Students who are selected for verification are notified via email of their outstanding documentation requirements within my.commnet.edu. Inceptia's VG also presents students with the requirements needed. Inceptia is responsible for collecting, reviewing, and verifying all documents. Nightly, the Banner system is updated to reflect those students who have completed verification through Inceptia. This is accomplished by reaching into their database through a secure FTP process, which will in turn complete any requirements needed to satisfy verification in Banner.

During the verification process, when conflicting information is found between the information provided on the applicant's application and documents available at the school concerning the applicant's eligibility, it will be resolved by the party (either Inceptia or the school) that detects the discrepancy. Specifically, Inceptia will resolve conflicting information regarding IRS DRT Flags 06 and 07 for those students selected by CPS. In all cases, the designated staff member must document in detail the discrepancy, the documentation requested to resolve the situation, and ultimately the resolution decision for audit purposes. It is the responsibility of the school to resolve conflicting information that occurs after verification has been completed. Disbursements are not made until conflicting information is resolved.

In the event a currently enrolled student who has already been awarded aid is subsequently selected for verification on a late arriving/subsequent ISIR, he or she will go through the same process of completing verification through Inceptia. If a student fails to complete the verification process prior to the next payment period, the student will be placed on a billing hold, future aid will not be released and the student will not be permitted to register/attend future classes until verification is completed.

Inceptia utilizes electronic signatures for students (and a parent of a dependent student). As such, it complies with the Standards for Electronic Signatures outlined in [GEN-01-06](#).

If it is determined during the verification process that a student is attempting to perpetrate fraud, the school will conduct an investigation. Inceptia will make detailed written referrals of potential fraud or other criminal misconduct to the Director of Financial Aid at the attending institution and to the Associate Vice President Financial Aid Services & Title IV Compliance (Central Office), who will make a report to the college President after investigating the documents. In case of potential employee fraud, refer to Section 15 (Title IV Fraud) of this manual.

Refer to Sections 6.1 (Application Process) and 6.2 (Forms) for additional information.

Additional information regarding [Verification procedures through Banner](#) can be found on [Connecticut Community Colleges' Policies and Procedures website](#).

7.1.3 DATA ELEMENTS TO BE VERIFIED

POLICY

Federal Verification is an ED mandated process that requires CT State to request, review, and if necessary, correct a student's FAFSA data as permitted under the applicable Federal Register Notice and corresponding Dear Colleague Letter.

As in prior years, CPS may "reselect" students previously verified under the V1 or V4 tracking groups for V5-type verification. Only data elements and documentation not previously appraised needs to be reviewed in these cases. Refer to [Electronic Announcement dated August 7, 2017](#) for details about the requirements for conflicting information reviews outside the verification process.

PROCEDURE

Inceptia is responsible for completing the verification process. Once it is complete, the Banner system is updated to reflect that the student has completed verification. If Inceptia updated a student's FAFSA, the attending CT State will receive an updated ISIR with the verified EFC. The institutional FAA will move forward with awarding the student.

Inceptia will report on a monthly basis the verification results for students who are selected to verify identity and high school completion (V4/V5) using the FAA Access to CPS Online.

All documentation submitted to Inceptia will be held for 5 years. Within VG, each student's file contains a binder of the information collected and used to complete the verification process.

A student is not packaged or awarded Title IV Aid prior to the completion of the verification process. In the event a student had been awarded aid, and then selected for verification on a subsequent ISIR, any notices of change in the award amounts are provided within a "revised" offer notification.

7.1.4 CONFLICTING AND INACCURATE INFORMATION

POLICY

Aid administrators will identify conflicting information regardless of the source and regardless of whether the student is selected for verification. The FAA will reach out to students individually to determine what additional documents are needed to clear up the conflicting information. Once it has been determined which data elements are accurate the FAA will make any changes to FAFSA data through FAA Access to CPS Online. Inceptia does not review and resolve conflicting information unless the ISIR has been selected for verification. Whichever party determines conflicting information is the one to collect documentation, review, and resolve the matter.

PROCEDURE

CT State review all subsequent transactions for a student for the entire processing year. ISIRs are examined for changes in EFC or for changes in any “C” flags once the transaction is uploaded into Banner.

If the college suspects that a student or an employee has misreported information and/or altered documentation to fraudulently obtain federal funds, the act may be reported, and evidence provided to the Office of Inspector General.

Refer to Sections 15.1 Student Fraud and 15.2 Institutional and Third-Party Fraud.

7.1.5 STUDENT NOTIFICATION OF VERIFICATION CHANGES

POLICY

The Financial Aid Office will notify students if their financial aid award changed as a result of verification.

PROCEDURE

Colleges will send a notification via my.commnet.edu to the student when their financial aid has been adjusted because of verification. The revised award letter will be explained in detail as to what was changed.

7.1.6 INTERIM DISBURSEMENTS

POLICY

CT State does not allow for interim disbursements.

PROCEDURE

There is no applicable procedure.

7.2 CLEARANCE OF DATABASE MATCHES, REJECT CODES, C-CODES, COMMENT CODES, AND OTHER EDITS

POLICY

There are a variety of issues that can appear on a student's ISIR that must be resolved prior to awarding financial aid. The Central Processing System (CPS) adds comment codes and text to the SAR/ISIR to provide information to the student and to the school about the student's processed FAFSA.

Annually, and more often if needed, Central Office staff reviews ED's annual publication of The ISIR Guide and SAR Comment Codes and Text to ensure that all policies and procedures account for all database matches, reject codes, C-Codes, comment codes, edits, and other flags which may impact a student's and/or parent's Title IV eligibility.

PROCEDURE

A "C" printed next to the EFC on the ISIR means the student has an eligibility problem that must be resolved before Title IV aid can be awarded to the student. Below is a list of common areas associated with "C" codes:

- Social Security Administration (SSA)
- Department of Homeland Security (DHS)
- Selective Service System Match
- National Student Loan Data System (NSLDS)
- Department of Defense (DoD)
- Department of Justice (DOJ) via ED Hold File
- Veterans Affairs Status Match
- Drug Convictions (FAFSA Question #23)
- Unusual Enrollment History
- Pell LEU
- Aggregate Loan Limits / Subsidized loan lifetime limits

In the event a student has an eligibility problem associated with a "C" Code, a specific tracking requirement will be posted during the nightly dataload process. The financial aid administrator can review the tracking requirements on the Data Load Summary Report. Weekly, the financial aid administrator sends notifications to students via my.comnet.edu to inform them of the eligibility problem and what documentation is required for it to be resolved. The student is responsible for providing the necessary documentation to the financial aid office so that the "C" code issue can be resolved. The financial aid administrator will review the document to make sure it resolves the "C" code eligibility problem. If the documentation satisfies the requirements, the financial aid administrator will clear the "C" code in the system, make a note on RHACOMM, and file or scan the documents to the student's file.

The financial aid administrator investigating the "C" code is responsible to ensure that proper documentation is maintained in the student's file when provided. Failure to provide documents required to clear the "C" code will result in ineligibility of future Title IV disbursements.

Additional emails are sent if no documentation has been received by the financial aid office or if more documents are needed. Students are instructed to return the documents as soon as possible in order to complete their file and be awarded Federal Student Aid.

In most cases, the Financial Aid Office will submit all corrections to the CPS based on the documentation submitted by the student. If the student needs to make the change such as supplying an electronic signature with an FSA ID, the student will be notified by email that they need to make that type of correction.

7.2.1 SOCIAL SECURITY ADMINISTRATION (SSA)

POLICY

For 2023-2024, the following comment codes are associated with Social Security Administration Citizenship Status: 146. The following comment coders are associated with Student's Social Security Number Match: 63 and 64. All FAFSA applications are matched with Social Security Administration (SSA) records to verify citizenship status, name, date of birth, and social security number (SSN). The CPS will reject the application for insufficient information if name, date of birth, or SSN is not provided.

CT State requires require the student to submit a copy of the social security card, confirming the name and SSN, or to correct the FAFSA if errors were made during the initial FAFSA filing.

For a full discussion on social security database matches refer to Volume 1, Chapter 2 of the FSA Handbook. The SAR Comment Codes and Text may be a helpful guide to help resolve "C" code issues.

PROCEDURE

The financial aid administrator will review the document to make sure it resolves the "C" code eligibility problem. If the documentation satisfies the requirements, the financial aid administrator will clear the "C" code in the system, make a note on RHACOMM, and file or scan the documents to the student's file.

7.2.2 DEPARTMENT OF HOMELAND SECURITY (DHS)

POLICY

For 2023-2024, the following comment codes are associated with DHS Matches: 46, 105, 109, 141, 142, and 144. An applicant who is a permanent resident or other eligible noncitizen must provide documentation confirming their status in order to receive federal student aid.

The financial aid administrator must collect documentation confirming the student's eligible citizenship status. Students must submit one of the following documents to Connecticut State Community College Financial Aid Office in order to establish eligibility for federal financial aid:

- Certificate of Naturalization or Certificate of Citizenship
- U.S. Birth Certificate
- U.S. Passport or Passport Card
- Permanent Resident Card or Resident Alien Card
- Arrival/Departure Record (Form I-94)
- Jay Treaty Card

Students receive a message through my.commnet.edu informing them they need to provide proof of their citizenship or eligible non-citizenship status. The documents must be submitted within 30 days, or the student may not be eligible for Federal financial aid funds.

Information on verifying citizen or eligible non citizenship status can be found in the FSA Handbook, Volume 1 (Student Eligibility).

PROCEDURE

The financial aid administrator should review the specific action required to resolve the "C" code in The SAR Comment Codes and Text. Using the citizenship documentation that the student provided, the financial aid

administrator should proceed to resolve the “C” code eligibility problem based on the action required. In some cases, the financial aid administrator will need to utilize the SAVE system to resolve the “C” code. Detailed instructions on how to resolve a “C” code by using the SAVE system can be found in the [October 16, 2019 Electronic Announcement](#). If the action taken and/or documentation satisfies the requirements, the financial aid administrator will clear the “C” code in the system, make a note on RHACOMM, and file or scan the documents to the student’s file.

7.2.3 SELECTIVE SERVICE SYSTEM (SSS)

POLICY

As part of the [Consolidated Appropriations Act, 2021](#), the Selective Service criteria was removed from student eligibility requirements for Title IV aid. Although associated comment codes and messaging (e.g. 30, 33, or 57) may appear on the ISIR, schools are instructed to ignore them.

PROCEDURE

The financial aid administrator should review the specific action required to resolve the “C” code in The SAR Comment Codes and Text. The financial aid administrator must make an eligibility determination after reviewing all of the submitted documentation. If the financial aid administrator believes the student knowingly and willfully failed to register, the student is not eligible for federal student aid. If the financial aid administrator believes the student did not knowingly or willfully fail to register, they are eligible for federal student aid.

Using the documentation that the student provided, the financial aid administrator should proceed to resolve the “C” code eligibility problem based on the action required. If the action taken and/or documentation satisfies the requirements, the financial aid administrator will clear the “C” code in the system, make a note on RHACOMM, and file or scan the documents to the student’s file. If the student is deemed ineligible, the financial aid administrator will make a note on RHACOMM accordingly.

7.2.4 NATIONAL STUDENT LOAN DATA SYSTEM (NSLDS)

For 2023-2024, the following comment codes are associated with NSLDS: 10, 20, 38, 39, 41, 42, 43, 65, 66, 67, 77, 79, 86, 90, 100, 101, 102, 107, 115, 116, 124, 132, 133, 134, 135, 136, 138, 254 to 256, 260, 289 to 294, 309 to 314, 346, 347, 392, and 393.

UEH comment codes 359 and 360 are addressed further below.

A person generally isn’t eligible for Federal student aid if they are in default on a direct loan or owe an overpayment on any Title IV grant or loan and have not made a repayment arrangement for the default or overpayment.

For a parent to receive a PLUS Loan, neither the parent nor the student may be in default or owe an overpayment on a direct loan or grant (though a parent in default on a PLUS loan does not make a student ineligible for aid). If the student’s FAFSA indicates that they are at or near the Federal aggregate loan limit or may be in default or owes an overpayment, the financial aid administrator must pull and review the student’s NSLDS record. The NSLDS record should be filed in the student’s file.

If the student is at their federal aggregate limit, they are no longer eligible to receive additional funds from that loan or grant.

If the student is near their federal aggregate limit for a loan or grant, the student will be awarded their remaining eligibility.

If the student is in default or owes an overpayment, the school will notify the student and request additional information before completing the financial aid package.

For a full discussion on NSLDS database matches refer to Volume 1, Chapter 3 of the FSA Handbook. The SAR Comment Codes and Text may be a helpful guide to help resolve “C” code issues.

PROCEDURE

The financial aid administrator should review the specific action required to resolve the “C” code in The SAR Comment Codes and Text. Using the documentation that the student provided, the financial aid administrator should proceed to resolve the “C” code eligibility problem based on the action required. If the action taken and/or documentation satisfies the requirements, the financial aid administrator will clear the “C” code in the system, make a note on RHACOMM, and file or scan the documents to the student’s file.

7.2.5 DEPARTMENT OF JUSTICE (DOJ) VIA ED HOLD FILE

POLICY

The CPS uses application data to calculate the EFC and to match against several databases, including the Department of Justice (DOJ).

For a full discussion on DOJ database matches refer to Chapter 1 of the Application and Verification Guide in the FSA Handbook.

PROCEDURE

The financial aid administrator should review the specific action required to resolve the “C” code in The SAR Comment Codes and Text. Using the documentation that the student provided, the financial aid administrator should proceed to resolve the “C” code eligibility problem based on the action required. If the action taken and/or documentation satisfies the requirements, the financial aid administrator will clear the “C” code in the system, make a note on RHACOMM, and file or scan the documents to the student’s file.

7.2.6 DEPARTMENT OF DEFENSE (DOD)

POLICY

The CPS uses application data to calculate the EFC and to match against several databases, including the Department of Defense (DoD). This match may determine a student's eligibility for an Iraq & Afghanistan Service Grant (IASG).

For a full discussion on DoD database matches, and IASG, refer to Chapters 1 and 3 of the Application and Verification Guide in the FSA Handbook.

PROCEDURE

The financial aid administrator should review the specific action required to resolve the “C” code in The SAR Comment Codes and Text. Using the documentation that the student provided, the financial aid administrator

should proceed to resolve the “C” code eligibility problem based on the action required. If the action taken and/or documentation satisfies the requirements, the financial aid administrator will clear the “C” code in the system, make a note on RHACOMM, and file or scan the documents to the student’s file.

7.2.7 DRUG CONVICTIONS (FAFSA QUESTION 23)

POLICY

As part of the [Consolidated Appropriations Act, 2021](#), the drug conviction criteria was removed from student eligibility requirements for Title IV aid. Although associated comment codes and messaging (e.g. 53, 54, 56, or 58) may appear on the ISIR, schools are instructed to ignore them.

PROCEDURE

The financial aid administrator should review the specific action required to resolve the “C” code in The SAR Comment Codes and Text. Using the documentation that the student provided, the financial aid administrator should proceed to resolve the “C” code eligibility problem based on the action required. If the action taken and/or documentation satisfies the requirements, the financial aid administrator will clear the “C” code in the system, make a note on RHACOMM, and file or scan the documents to the student’s file.

7.2.8 UNUSUAL ENROLLMENT HISTORY (UEH)

POLICY

For 2023-2024, the following comment codes are associated with Unusual Enrollment History: 359 and 360. Students who have been flagged with an Unusual Enrollment History (UEH) flag will be required to submit college transcripts for each institution attended during any one of the four award years prior to the current award year at Connecticut State Community College in addition to completing an Unusual Enrollment History Form with the college.

To resolve a UEH flag of “2,” (SAR comment code 359) the financial aid administrator must check the student’s enrollment and financial aid records through NSLDS to determine if, during any of the four award years prior to the current award year, the student received a Pell Grant or Direct Loan at CT State. If so, no further action is required unless the financial aid administrator has reason to believe that the student remains enrolled just long enough to collect student aid. If this is the case, follow the instructions for UEH flag “3.”

To resolve a UEH flag of “3,” (SAR comment code 360) the financial aid administrator must collect and check the student’s academic records to determine if they received academic credit at the school(s) they attended during any one of the four award years prior to the current award year. Using data from NSLDS determine for each prior attended institution, whether academic credit was earned during the award year in which the student received Pell or Direct Loan funds. Earning academic credit means completing one or more credit-hour.

- If the student did earn academic credit at all of the schools previously attended for a relevant award year, document the decision and add the supporting documents to the student’s file.
- If the student did not earn academic credit at a previously attended school, the financial aid administrator must obtain documentation from the student explaining why the student failed to earn academic credit. The financial aid administrator must determine whether the documentation provided supports the reasons described by the student and that the student did not enroll only to receive credit balance funds.

If the student with a UEH flag of 3 provides documentation that supports an acceptable reason for failing to receive academic credit, document the decision and add the supporting documentation to the student’s file.

If the student with a UEH flag of 2 or 3 fails to provide documentation or does not provide an acceptable reason for failing to receive academic credit, they are no longer eligible for federal student aid. Notify the student in writing that they are no longer eligible for federal financial aid and indicate how they can regain eligibility. This can include successful completion of academic credit or meeting the requirements of an academic plan that is established by the financial aid administrator. In general, all institutions require students to complete 6 credits (or complete 100% of all registered courses) and earn a GPA of 2.0 or higher during the probation semester. For more details on the Department of Education's guidance on UEH's refer to Volume 1, Chapter 3 of the FSA Handbook.

PROCEDURE

The financial aid administrator should review the specific action required to resolve the “C” code in The SAR Comment Codes and Text. Using the Unusual Enrollment History Form and documentation that the student provided, the financial aid administrator should proceed to resolve the “C” code eligibility problem based on the action required. If the action taken and/or documentation satisfies the requirements, the financial aid administrator will clear the “C” code in the system, make a note on RHACOMM, and file or scan the documents to the student’s file.

7.3 REVIEW OF SUBSEQUENT ISIR TRANSACTIONS AND POST-SCREENING

POLICY

ED regulations generally require institutions to review all subsequent transactions for a student for the entire processing year even if an earlier ISIR has been verified. It is the responsibility of the Director of Financial Aid at each school to ensure that subsequent ISIRs are reviewed. In addition, it is the responsibility of the Director of Financial Aid and Financial Aid Administrators to ensure that appropriate action has been taken to notify the student of any circumstances that make the student no longer eligible for Federal Student Aid.

PROCEDURE

Students with subsequent ISIR transactions are listed on the Data Load Summary Report that is available for daily review. Any financial aid that has already disbursed to the student’s account is pulled back and future disbursements are placed on hold.

The financial aid administrator should determine if the EFC or if the post-screening reason (code) impacts eligibility for aid. The financial aid administrator should reference The ISIR Guide for post-screening code reasons. If the EFC has not changed and post-screening reason does not impact financial aid eligibility, no action is generally required. If the EFC does change but it either doesn’t affect the amount and type of aid received or the data elements that changed were already verified, no action is required.

If the post-screening code requires a resolution, the financial aid administrator will review the post-screening reason, NSLDS, and the current financial aid award to resolve the issue. The financial aid administrator may need to adjust the financial aid award as a result of the post-screening.

If the student needs to provide documentation, they will be notified. When the post-screening issue is resolved, the financial aid administrator will comment on the Banner system (RHACOMM), re-disburse any financial aid, and file the documentation.

7.3.1 DEFAULTS

POLICY

After submitting the FAFSA, ED attempts to match the information provided with what is on NSLDS. This is to ensure that students are not in default on any previously borrowed student loans, are not close to or over aggregate federal loan limits, and a grant overpayment is not owed.

PROCEDURE

Students who have previously borrowed and have defaulted on a Federal Direct Loan will be eligible to borrow a Direct Loan at a CT State once they have paid the previous loan in full, have consolidated a previously defaulted loan, or have made satisfactory repayment arrangements, generally defined as having made six consecutive monthly payments. The student must provide documentation from the holder of the loan indicating that a satisfactory repayment plan has been approved and six consecutive monthly payments have been made or a promissory note marked "Paid in full" is submitted.

7.3.2 OVERPAYMENTS

POLICY

Students may receive Federal Student Aid only to the extent they show financial need. Total resources, regardless of the source, generally must not exceed a Federal Student Aid recipient's demonstrated need (i.e., the difference between COA and EFC). Colleges may not overaward the student when packaging Federal Student Aid. Need for the Pell Grant program is determined independently, and the student's Pell Grant award is not reduced due to other resources. However, awards under the campus-based programs and, with certain exceptions, the Direct Loan program, must be adjusted in accordance with specific regulations and procedures in order to avoid overpaying the student, even if the student receives additional unanticipated resources after packaging is completed. If a student receives more aid than they were supposed to, it must be repaid. Students who have received financial aid and withdraw from the institution during the academic term or payment period, or were overawarded, or if eligibility changes, may need to return or repay some or all of the funds received. This may result in a debt owed to the institution. Financial Student Aid recipients will be billed for any unearned funds and resulting unpaid charges.

Below are some examples of why a student might have to repay all or part of a Pell Grant:

- Early withdrawal from the program for which the grant was disbursed
 - Change in enrollment status in a way that reduced eligibility for the funds
 - Receipt of an outside scholarship or grant that reduced Need for Federal Student Aid
-

PROCEDURE

The first measure taken to prevent over-awarding of need-based aid is defaulted within the Banner system, which is set to prevent over-awards when auto-packaging. For other resources that are entered or made known after packaging, the RORCALC report is run periodically to identify possible over-award situations.

A second measure to identify and resolve over-awards is through the RWPOVRAD (Potential Overaward Report) report in Banner. This report provides for the identification of potential need and cost of attendance overawards within a single payment period for resolution by college staff. This process is completed at least two times each week.

Federal Pell grant awards are never reduced to resolve an over-award. Possible actions taken to resolve an over-award include reallocating Federal Direct Subsidized Student Loan to Federal Direct Unsubsidized Student Loan, reduction or cancellation of Campus-Based aid or other need-based aid (except Pell) or utilizing the \$300 tolerance for over-awards of Campus-Based funds. Iraq and Afghanistan Service Grants may be reduced if it alone exceeds a student's cost of attendance. The financial aid director or designated financial aid staff review the overaward.

For more detail regarding overpayments and how to resolve them, refer to Section 9.10: Packaging Financial Aid or 13.5.1 Overpayment Resolution.

7.3.3 CHANGE IN DISABILITY STATUS

POLICY

Students with Direct Loans may qualify to be discharged if the borrower/obligation holder becomes totally and permanently disabled. Except for veterans who qualify for a total and permanent disability (TPD) discharge based on a determination by the Department of Veterans Affairs (VA) that they are unemployable due to a service-connected disability, ED monitors the status of borrowers who have received a TPD discharge for a three-year period.

PROCEDURE

If a borrower whose prior loan was discharged due to a total and permanent disability wishes to take out another Direct Loan, they must obtain a physician's certification (the student only needs to obtain the physician certification once; the school keeps a copy of it in the student's file. But the school must collect a new borrower acknowledgment from the student each time he receives a new loan) that he has the ability to engage in substantial gainful activity, and he must sign a borrower statement acknowledging that the new federal loan can't later be discharged for any present impairment unless it deteriorates so that he is again totally and permanently disabled.

A further discussion on loan discharges can be found in Volume 1, Chapter 3 of the FSA Handbook.

7.3.4 POST-SCREENING PROCESS

POLICY

NSLDS uses a post-screening process to let schools know when there are significant changes (such as a defaulted loan or an overpayment) to a student's financial aid history. If NSLDS finds a case where a student's eligibility has changed, CPS will generate a new ISIR record and push it to the school for review.

A post-screening code on the pushed ISIR that will help the financial aid administrator determine what changed. The ISIR Guide lists all post-screening codes, including a description of the issue.

PROCEDURE

Students with post-screening codes are listed on the Dataload Discrepancy Report. Any financial aid that has already disbursed to the student's account is automatically pulled back and future disbursements are placed on hold.

The financial aid administrator should determine if the post-screening reason (code) impacts their eligibility for aid. The financial aid administrator should reference The ISIR Guide for post-screening code reasons.

If the post-screening reason does not impact financial aid eligibility, no action is generally required.

If the post-screening code requires a resolution, the financial aid administrator will review the post-screening reason, NSLDS, and the current financial aid award to resolve the issue. The financial aid administrator may need to adjust the financial aid award as a result of the new information in NSLDS.

If the student needs to provide documentation, they will be notified. When the post-screening issue is resolved, the financial aid administrator will comment on the Banner system (RHACOMM), re-disburse any financial aid, and file the documentation.

7.4 STAFF ACKNOWLEDGEMENT OF APPLICANT

POLICY

To mitigate potential conflicts of interest and the possibility of fraudulent activity, all Financial Aid Office staff are required to recuse themselves from working on the file of any student whom they are related to or have a personal relationship or friendship with.

Refer to Section 15 (Title IV Fraud) for additional information.

PROCEDURE

Financial aid staff members recusing themselves from working on the file of students that they are related to or have a personal relationship or friendship must indicate such a relationship to the Director of Financial Aid. The Director will assign another staff member to assume responsibility for the student's application and record. The Director must document this in the RHACOMM form in Banner.

Should the relationship involve the Director of Financial Aid, the Director shall indicate such a relationship to the Associate Vice President for Financial Aid Services & Title IV Compliance, who will assign another staff member to assume responsibility for the student's application and record. The AVP must document this in the RHACOMM form in Banner.

SECTION 8: STUDENT BUDGETS

The terms *budget*, *cost of attendance (COA)*, and *cost of education* are used synonymously among financial aid professionals. We will use the term budget to explain what is included in this section.

8.1 VARIOUS STUDENT POPULATIONS

POLICY

Student budgets are designed to provide students with an accurate projection of reasonable costs, and to enable the financial aid office to formulate an appropriate aid package. CT State utilize the following basic budgets:

- In State: with Parent or Off Campus
- Out of State: with Parent or Off Campus
- NEBHE: with Parent or Off Campus

Additionally, there are several specialized budgets assigned to students in specific programs such as Allied Health, Manufacturing, and Dental Hygiene. The programs with specialized budgets have additional costs associated such as more expensive books or special program supplies. Degree and certificate programs have the same student budgets. The Connecticut State Community Colleges utilize the period-based budgeting feature within Banner.

PROCEDURE

Aid applicants are assigned to one of the six basic groups as part of the dataload process when ISIRs are imported. All specialized budgets are automatically assigned based on any pre-defined criteria. Students who do not fall into one of these budget groups will be placed into a “Default” budget group for error review and reassignment by college staff.

8.2 HOW BUDGETS ARE DERIVED AND UPDATED

POLICY

The basic student budget components used by CT State include the components identified below. All budgets are initially provided to students based upon full-time enrollment (12 credits per semester) for a nine-month academic year (24 credits per year). Student budgets are prorated according to actual enrollment at census.

- Tuition and Fees
 - Tuition and fees are annually set by the Board of Regents unless otherwise noted. This includes additional fees for specialty programs, such as those in the Allied Health or Manufacturing fields. Prior year rates for this component are used and then updated once the new rates are adopted by the Board.
- Books and Supplies
 - Books and supplies cost are taken from the most recent Trends in College Pricing publication by the College Board for two-year colleges. This value shall be increased by the Consumer Price Index value cited in the College Board’s Living Expense Budget for the applicable award year and rounded to the nearest whole number. Students in the Nursing program use digital books through an arrangement with Follett and are charged a media fee equally over four semesters, which is captured in the specific program budget.
- Room and Board
 - The room and board component is initially derived from the College Board’s Living Expense budget for low 9-month budgets in the United States for the applicable award year, using the “housing” component which evaluates both room and board costs. “Off Campus” Room and Board costs are determined using the College Board’s Living Expense Budget for low 9-month budgets in the applicable academic year. “With Parent” Room and Board costs are determined using the College Board’s Living Expense Budget for low 9-month budgets in the applicable academic year less a factor of 25%. The prevailing value for the low housing component shall be annually factored by the Cost-of-Living Index for Connecticut, provided by The Council for Community and Economic Research to provide a more localized reflection of room and board expenses.
- Transportation
 - The transportation component is initially derived from the College Board’s Living Expense budget for low 9-month budgets in the United States for the applicable award year, using the “transportation” component. “Off Campus” transportation costs are determined using the

College Board's Living Expense Budget for low 9-month budgets in the applicable academic year. "With Parent" transportation costs are determined using the College Board's Living Expense Budget for low 9-month budgets in the applicable academic year less a factor of 25%. The prevailing value for the low transportation component shall be annually factored by the Cost-of-Living Index for Connecticut, provided by The Council for Community and Economic Research to provide a more localized reflection of transportation expenses.

- **Miscellaneous Personal Expenses**
 - The miscellaneous personal expense component is initially derived from the College Board's Living Expense budget for low 9-month budgets in the United States for the applicable award year, using the "miscellaneous" component. "Off Campus" miscellaneous costs are determined using the College Board's Living Expense Budget for low 9-month budgets in the applicable academic year. "With Parent" miscellaneous costs are determined using the College Board's Living Expense Budget for low 9-month budgets in the applicable academic year less a factor of 25%. The prevailing value for the low miscellaneous component shall be annually factored by the Cost-of-Living Index for Connecticut, provided by The Council for Community and Economic Research to provide a more localized reflection of miscellaneous expenses.
- Internet usage costs of \$50 per month, or \$450 per 9-month award year shall be added for each student as an independent component.

Note: College Board Living Expense values are developed based on data from the most recent Consumer Expenditure Survey, produced by the Bureau of Labor Statistics, including consideration for the Consumer Price Index. The County Level Index reflects current expenses based on an econometric model that identifies key determinants of an area's cost of living.

Budgets for students utilizing Consortium Agreements will be based upon the budget of the identified "Home School."

For all of the basic components, average costs are used rather than actual. The budget appeal process is outlined in Section 8.6.

PROCEDURE

Aid year budget development begins in November prior to the award year when the Banner new year setup begins.

Derivation of each budget component is in the above section policy, including tuition and fees, books and supplies, room and board, transportation, miscellaneous personal expenses, and internet costs.

All budgets are initially provided to students based upon full-time enrollment (12 credits per semester) for a nine-month academic year (24 credits per year). Student budgets are prorated according to actual enrollment at census through the period-based budgeting functionality in the Banner system. However, some students with part of term enrollment may require manual review and revision.

Once individual budget components are determined for the year, the amounts are provided to the individual schools for input into RBRPBGR (Period Budget Group Aid Year Rules). Relevant aid year-specific rules are rolled over but require review prior to activation.

As ISIRs are loaded into the Banner system, a batch process is run to auto-assign students to a budgeting group based upon existing Banner and ISIR data. Student budgets are captured in the Banner system in RBAPBUD (Applicant Period Budget). These are reviewed for accuracy through daily monitoring reports.

For students in high-cost programs such as Allied Health, Manufacturing, and Nursing, additional program-specific fees are assigned to the cost of attendance prior to packaging.

8.3 ADDITIONAL COSTS

POLICY

To ensure consideration of all educationally related expenses when awarding, additional cost components may be added to a student budget, as needed.

Components that may be added to the basic budget for additional documented costs are:

- Loan Fees
 - Loan fees are included in each student's budget, calculated as an undergraduate average using the following formula:

$$\frac{\$5,500 + \$6,500 + \$9,500 + \$10,500}{4} \times \text{Fee for loans disbursed after 10/1/23}$$

- Additional Educational Costs for Students with Disabilities
 - Students must notify the financial aid office if they have these additional expenses. This is handled through Professional Judgment, and documentation of the expense is required.
- Computer Expense
 - The purchase of a personal computer would also be handled through Professional Judgment requiring documentation of cost. This cost is added to the Books and Supplies budget component.
- Program-Specific Expenses
 - Specialty programs, including those within the Allied Health and Manufacturing fields may include program-specific fees that are assigned during the initial budgeting process.

PROCEDURE

Information to inform students of the opportunity to request a budget adjustment is published, at a minimum, in the Student Handbook and on campus websites. The adjustment process proceeds through a Professional Judgment consideration with the student completing a Special Circumstances Form.

See Section 8.6 on procedural guidance for processing appeals.

8.4 BUDGET RESTRICTIONS

POLICY

Certain student categories are restricted from containing certain allowable budget components. These include less-than-half-time students, and incarcerated students for those colleges participating providing Pell Grants to incarcerated students.

- Incarcerated Students: Only tuition, fees, and book costs are allowed under the constraints of the experiment.

- Less-Than-Half-Time Students: Federally allowable budget components include tuition, fees, and books, however allowances for room and board are available on a case-by-case basis for no more than three semesters, of which only two may be consecutive.

PROCEDURE

Incarcerated students are assigned to a budget group through a cohort code assignment upon admission to the college, which reflects only direct costs. Students initially within this population who are no longer incarcerated but continue their education at the college must have their cohort code expired within the Banner Student module in order to provide for the inclusion of indirect costs into their cost of attendance.

All other students are packaged with a full-time budget with all basic budget components. Period-based budgeting is run once each semester's census has been established, which adjusts their budget according to their actual enrollment. For students who are enrolled less than half-time, the budget is adjusted to only include tuition, fees, and books. Allowances for room and board are available on a case-by-case basis for no more than three semesters, of which only two may be consecutive.

8.5 BUDGET WAIVERS

POLICY

Budget waivers must be applied, or the resource must otherwise be taken into consideration when such is offset by payment from a third-party.

PROCEDURE

When a third-party payment is made to a student account, this is identified as a resource through RPAARSC. All resource amounts are displayed in summation on ROARMAN and are treated as Estimated Financial Assistance. This may influence the student's overall financial aid package by reducing unmet need and requires review for a potential overaward.

8.6 BUDGET APPEALS

POLICY

Budget appeals are allowable in situations where the student budget is not reflective of the student's true educational expenses and may subsequently influence the award amount.

Budget adjustments may be considered on a case-by-case basis based upon an appeal made by the student and processed as a Professional Judgment. The situations will vary but may include additional educational expenses as supported by documentation provided by the student.

Situations where an appeal may be warranted:

- Purchase of a personal computer.
- Students with a one-time exceptional expense beyond their control which increased their educationally related cost (e.g., COVID-19, natural disaster).
- Students with higher-than-average transportation expenses due to circumstances beyond their control.

Appropriate documentation must be submitted within the period of enrollment or other specified timeframe for consideration. If inadequate documentation is submitted, or if the appeal and documentation is submitted outside of the specified deadline, the appeal will be automatically denied.

Each appeal shall be reviewed by a committee comprised of at least three college officials, one of which must be a financial aid administrator. Each appeal decision is considered final and may not be appealed to a higher authority.

PROCEDURE

If a student submits a Special Circumstances Form, a review will be conducted by way of a committee (described above).

Evidence of the professional judgment process is documented within the imaging system, and a comment is made in RHACOMM. Upon approval, the student's budget is adjusted accordingly.

SECTION 9: PACKAGING FINANCIAL AID

9.1 PACKAGING PHILOSOPHIES

POLICY

CT State is held to the [Financial Aid Policy](#) adopted by the Board of Regents. This policy additionally provides for adherence of the Financial Aid Code of Conduct.

With support from the Board of Regents, CT State has developed an institutional packaging philosophy to ensure the consistent, fair, and equitable distribution of available funds in order to provide financial assistance to eligible students. To support the educational achievement of our students, each institution shall award financial aid funds from available resources to promote access to higher education, facilitate completion, enable personal and professional growth, and ultimately contribute to the prosperity of the State of Connecticut.

To assist prospective students and financial aid applicants with their decision-making process, colleges must provide timely financial aid awards. The Board of Regents recommends that colleges require students provide only information consistent with the annual requirements provided by the US Department of Education and Federal Student Aid in an effort to remove barriers to entry and place students on a path to success.

Financial assistance is available from federal, state, and institutional sources; it is awarded to students that apply and meet certain eligibility criteria. Available funds shall be packaged based on Financial Need, as determined by federal methodology calculations resulting from completion of a Free Application for Federal Student Aid (FAFSA). Financial Need is defined as a student's Expected Family Contribution (EFC) as compared to a Cost of Attendance (COA). Financial aid awards shall not exceed a student's Cost of Attendance (COA). Aid eligibility which is contingent on Financial Need may be influenced by the presence of other forms of financial assistance available to students, as well as the colleges' policies for distributing their allocated resources.

CT State auto-packages a student's eligibility for Federal Direct Subsidized and Unsubsidized Loans, but not Federal Direct PLUS Loans.

PROCEDURE

Institutions begin awarding financial aid to eligible student generally in the spring for the upcoming award year.

Financial aid awards are made throughout the year on a first-come, first-served basis that is subject to available funding. All students are initially awarded based on estimated full-time enrollment and fulltime costs. Applicants whose financial aid applications are complete by college-specific priority deadlines will receive maximum consideration in the distribution of funding resources and according to funding criteria. Colleges shall give special attention to those students with exceptional Financial Need.

A student's financial aid award is subject to adjustment at any point in the academic year due to reasons including, but not limited to a correction by the college, changes made to FAFSA information, the receipt of financial assistance from outside sources, and/or changes in federal, state, or institutional appropriations.

9.2 AVAILABLE FUNDS AND NUMBER OF ELIGIBLE STUDENTS

POLICY

CT State participates in the Federal Pell Grant and Federal Direct Loan programs, as well as the Federal Supplemental Educational Opportunity Grant and Federal Work Study programs as campus-based funds. The college does not provide TEACH Grants.

The Roberta B. Willis Scholarship Program is a state-funded program available to Connecticut residents attending at least half-time. This program, offered in both a need-based and need-merit format, is administered by the Connecticut Office of Higher Education and is subject to annual appropriations by the State of Connecticut. The Pledge to Advance Connecticut (PACT) program is a state-funded program available to Connecticut residents attending at least half time. This program is provided as a last dollar offering provided to cover eligible tuition and fee expenses and is subject to annual appropriations by the State of Connecticut.

The Connecticut State Grant is an institutionally funded aid program available to Connecticut residents who demonstrate financial need by way of completing a FAFSA. This program is also available to students eligible who complete an AACTUS application. This institutional program is derived using at least 15% of tuition revenues. Foundation awards are also available in varying degrees from each of the institution. The timing of these various funding sources drives a repackaging model as funds from these sources or awards to students are made known.

PROCEDURE

CT State is typically made aware of its annual appropriation for the Roberta B. Willis Scholarship and PACT programs at the conclusion of each legislative session. Eligibility criteria is delineated through state law. The CT State Grant allocation is provided by the college Chief Fiscal Officer.

9.2.1 CAMPUS-BASED PROGRAM AMOUNTS

POLICY

CT State distributes FSEOG funding to students with exceptional need and provides work-study placements within the college and in community service roles. These funds are added to eligible student aid packages, as appropriate.

Participation in the campus-based funds provides for an Administrative Cost Allowance (ACA), which may be used to offset the costs associated with the administration of federal funds. If taken, any ACA payments are not taken into account when awarding students.

PROCEDURE

FSEOG funds are awarded to students with an eligible EFC of zero (0) as the first selection group. Subsequent selection groups may be determined using the annual Pell Chart as guidance.

Any ACA payment is calculated from the campus-based allocations per the federal formula. These funds are then used to offset the costs associated with administering these funds, which may be linked to operating budget costs or professional development expenses, or other eligible costs.

Institutions shall utilize students with a zero (0) EFC as the first selection group for FESOG funds. Subsequent selection groups may be determined using the annual Pell Chart as guidance.

9.3 PACKAGING GROUPS

POLICY

CT State provides award notifications to student based a 9-month EFC. Awards are initially presented reflective of a full-time enrollment status; however, awards will prorate as the enrollment status changes.

PROCEDURE

Students are placed into one of six packaging groups, assigned in order of applicability.

1. Not Admitted – No Student Status
2. No ISIR
3. Second Chance Pell
4. High Fee
5. Standard
6. Packaging Default

Students are packaged on a rolling basis as ISIRs are drawn in from CPS, thus providing the most equitable approach to each student applying for aid.

9.4 DETERMINING AMOUNTS

POLICY

Each institution seeks to fund a student's direct costs, consisting of tuition, fees, and an allowance for books and supplies.

Annual Federal Pell grant amounts are determined by ED and announced to schools in spring prior to the aid year. Any changes to Federal Direct Loan amounts would be announced around the same timeframe. Campus-based allocations are also announced during the spring prior to the aid year and monitored throughout the year. State allocations (Roberta B. Willis Scholarship Program and PACT) are subject to the State of Connecticut's budgetary cycle and announced at the end of each legislative session. Award amounts are subject to applicable state laws.

Institutional aid is awarded to address any existing gap in an aid package after federal and state sources are applied and up to a predetermined amount according to packaging group.

Foundation awards and other external award amounts are provided and applied, as needed.

PROCEDURE

CT State begins its awarding cycle each spring for the upcoming award year. Funds are awarded on a first come, first served basis. The following order of need-based grant/scholarship funding is applied in the packaging process:

1. Federal Pell Grant
2. Federal Supplemental Educational Opportunity Grant
3. Roberta B. Willis Scholarship Program
4. Pledge to Advance Connecticut Program
5. CT State Grant

Direct Subsidized and Unsubsidized Loans are automatically applied to each eligible student. Federal PLUS Loans are not automatically packaged.

Historical aid packages, changes to tuition and fees, and other avenues are explored annually to help influence any funding amounts, typically limited to the CT State Grant, which has the most flexibility.

9.4.1 PROGRAM-SPECIFIC AMOUNT DETERMINATIONS

POLICY

Pell Grant and Direct Subsidized and Unsubsidized loan amounts are calculated in accordance with regulatory requirements and awarded to students to reflect their maximum eligibility for the award year. Campus-based funds are distributed to those students who demonstrate the most need (FSEOG) and an interest in working while enrolled at CT State (FWS). CT State monitors for students eligible for IASG and HEROES grants.

The Roberta B. Willis Scholarship Program and PACT funds provide predetermined award amounts based on a statutory calculation.

Institutional aid is used to supplement an aid package when needed, or when a student is not eligible for any other funds.

PROCEDURE

CT State uses Banner as its student information system and tool for financial aid delivery. Funds are auto-packaged to the extent that funds are available, using equity packaging amounts of \$5,800 for students in the Standard packaging group, and \$6,100 for students in the High Fee packaging group.

9.5 PACKAGE CONSTRUCTION

POLICY

Applicants are packaged after verification has been completed, and on a continuously rolling basis as ISIRs are received and verified throughout the aid year. Applicants are packaged as full-time (12 credits), full-year (9-month award year). If the enrollment status is less-than-full-time, the award is adjusted at the time of enrollment until the established census date.

PROCEDURE

Colleges ensure packaging policies are being followed through system defaults in the Banner system used to handle financial aid administration. Batch processes are run with population selections which trigger actions based-upon pre-defined parameters from RWPXP01 (Batch Packaging). This customized batch packaging process includes the following Banner processes, and may be run by aid year, in update or simulation, and by packaging group:

- RPEPKG - Packaging Process
- RPRSAWD - Simulation Award Report
- RORCALC - Calculated Values Process
- RORBPST - Batch Posting Process

Award notifications are sent by email to students who have been packaged with financial aid. Subsequently, RSRENRL (Financial Aid Enrollment Hours) is run to adjust the student's enrollment level in ROAENRL to match the actual enrollment as of the college-wide census date each semester. The RWPXP02 (Batch Disbursement) process will then memo, authorize, or transmit aid to the student account.

9.6 PACKAGING OTHER EDUCATIONAL RESOURCES

POLICY

Other educational resources are also considered within a student's financial aid package and depending up on the type and amount may impact any need-based federal aid.

Defaults set within the Banner system prevent over-awards of need-based aid, however, if an additional resource is added outside of the auto-packaging process an over-award may occur.

PROCEDURE

Financial Aid Office staff use a monitoring report (RORCALC) to learn of any possible over-award situations which need to be addressed. The information from this report shows third-party resources that have been credited to the student's account by another department. Additionally, the RWPOVRAD report is available to identify both need and cost of attendance overawards within a single payment period.

9.6.1 STUDENT SUPPORT SERVICES GRANTS

POLICY

CT State have any Student Support Services (SSS) Grant Program funds awarded to students.

PROCEDURE

N/A

9.6.2 GAINING EARLY AWARENESS AND READINESS FOR UNDERGRADUATE PROGRAM FUNDS

POLICY

In process

PROCEDURE

In process

9.6.3 AMERICORPS BENEFITS

POLICY

The CT State finance office (e.g., Bursar) handles AmeriCorps benefits after receiving a request for an AmeriCorps payment to be certified. The designated official determines if the student meets the eligibility and if the amount requested is appropriate. When the request information is processed, a response is submitted back to AmeriCorps who will then release funds if approved. The receipt of the funds and application to the students account is then identified as a resource for the financial aid office through the RPAARSC form and treated as Estimated Financial Assistance.

PROCEDURE

A student will submit a request through the AmeriCorps account to have AmeriCorps funds certified for application to the student's account. This request is routed to the State Community College individual who is the designated contact and administrator. The request is reviewed for eligibility and appropriate amount and processed through electronic submission. AmeriCorps will then release the funds to the institution to apply to the student's account. The Bursar will apply these funds and identify these as a resource for the financial aid office to review for any impact on previously awarded need-based aid.

9.6.4 VOCATIONAL REHABILITATION BENEFITS

POLICY

The CT State finance office (e.g., Bursar) handles Vocational Rehabilitation Benefits, crediting to the student account and then identifying this as a resource for the financial aid office, as needed.

PROCEDURE

CT State uses the Professional Judgment process to add any educationally related disability expenses to a student's Cost of Attendance, if applicable.

9.6.5 BUREAU OF INDIAN AFFAIRS GRANTS

POLICY

The local Finance Offices intake these funds, which are treated as a resource/EFA.

PROCEDURE

The receipt of the funds and application to the students account is then identified as a resource for the financial aid office through the RPAARSC form and treated as Estimated Financial Assistance. The financial aid office personnel periodically run RORCALC, a monitoring report, to identify possible over-awards. The student's financial aid package is reviewed at this time. Over-award situations are resolved by reduction or reallocating other need-based aid.

9.6.6 HEALTH AND HUMAN SERVICES PROGRAM GRANTS AND LOANS

POLICY

The CT State finance office provides intake for these funds, which are treated as a resource/EFA.

PROCEDURE

The receipt of the funds and application to the students account is then identified as a resource for the financial aid office through the RPAARSC form and treated as Estimated Financial Assistance. The financial aid office personnel periodically run RORCALC, a monitoring report, to identify possible over-awards. The student's financial aid package is reviewed at this time. Over-award situations are resolved by reduction or reallocating other need-based aid.

9.7 EMPLOYER-PROVIDED EDUCATIONAL ASSISTANCE

POLICY

The CT State finance office provides intake for these funds, which are treated as a resource/EFA.

PROCEDURE

The receipt of the funds and application to the students account is then identified as a resource for the financial aid office through the RPAARSC form and treated as Estimated Financial Assistance. The financial aid office personnel periodically run RORCALC, a monitoring report, to identify possible over-awards. The student's financial aid package is reviewed at this time. Over-award situations are resolved by reduction or reallocating other need-based aid.

9.8 SUMMER FINANCIAL ASSISTANCE

POLICY

CT State treats summer as a trailer. Students are eligible to receive their remaining Scheduled Pell Grant award if they received less-than-full-time during the award year. Students may also be eligible for a 150% Pell Grant award if they received 100% of their Scheduled Pell Award during the Fall and Spring semesters and are enrolled in at least 6 eligible credits during the summer. If a student drops below 6 credits prior to frozen enrollment during the summer, they would no longer be eligible for their 150% Pell Grant award. During each Spring semester, student budgets are updated to reflect a budget greater than 9 months. Any remaining Campus-Based funds may also be applied to ensure the annual allocation is expended. Federal Student Loans are awarded using a Scheduled Academic Year (SAY).

CT State does not require an application to have aid processed for summer.

PROCEDURE

Internal reports are available to identify federal aid students who are enrolled for summer, as well as those who have remaining eligibility for their Scheduled Award of 100%. The reports are manually reviewed to determine loan eligibility as well as whether a student has either remaining Pell Grant eligibility or Year-Round Pell eligibility. The student's budget is updated to reflect summer enrollment. Summer awards are automatically updated in Banner when a summer budgetary component is added, and a Scheduled Pell Award is recalculated to reflect 150%. Campus-based aid is generally expended during the fall and spring semesters.

9.9 PACKAGE NOTIFICATION

POLICY

CT State provides an award notification email to students' college email accounts when their aid is awarded. Students are instructed to review award information through Banner Self-Service. Students are also able to see award information through the College Financing Plan (formerly known as the Shopping Sheet), which is provided in Banner Self-Service and is separate functionality that combines information into a standard award letter format. The Connecticut State Community Colleges use a common offer notice template to notify students of the aid offer.

PROCEDURE

The financial aid office generates email notifications to college email accounts, which are sent to students once financial aid has been awarded. These notifications are logged into RUAMAIL. Package revision notifications are handled in the same manner.

9.9.1 PACKAGING APPEALS

POLICY

CT State posts information on their websites regarding requesting appeals, but most appeal situations are identified in conversation with the student. A conversation with the student is also what guides determination of appropriate documentation needed for processing an appeal.

Students are required to complete a Special Circumstances Form to have their appeal request considered. Appeals are considered by a committee of at least three college officials, in which one must be a financial aid administrator. As such, the decision of the committee is final and is not for consideration to a higher authority.

PROCEDURE

Students must complete a Special Circumstances Form, which is submitted to the financial aid office for review. The financial aid office will notify the student regarding supporting documentation to submit, or any clarification needed.

If the appeal is approved, the affected data elements shall be updated, and the EFC recalculated for additional eligibility and the student notified in writing. If the appeal is denied, the student shall be notified in writing. In all cases, the decision and communication are logged in RHACOMM for future reference. All applicable documentation is stored within the imaging system.

9.9.2 AID PACKAGE REVISIONS

POLICY

CT State awards federal aid under the assumption the student will be enrolled full-time. Awards are revised based upon actual enrollment levels.

PROCEDURE

On the 21st day of classes in a traditional semester, each college freezes student enrollment for data reporting purposes. In conjunction with this process, Financial Aid runs the RSRENRL process, which freezes student

enrollment for financial aid awarding and disbursement purposes (the student's Pell Recalculation Date). This is the enrollment status by which the Federal Pell grant will be calculated for the term. If the student adds or drops classes, the Federal Pell grant will not be recalculated after this date.

The RWPXP01 process is then run to recalculate the Federal Pell grant based upon the enrollment level, and the grant is transmitted to the student account for refund processing.

The daily disbursement reports are reviewed for adjustments, rejects, and warnings. These reports are then acknowledged as reviewed and archived as evidence in case needed for reference.

9.10 OVERAWARDS AND OVERPAYMENTS

POLICY

Students may be considered over-awarded when need-based aid that has been awarded exceeds the student's unmet need. When these situations occur, they must be addressed to ensure that need-based aid stays in balance with unmet need. Connecticut State Community Colleges revise need-based award packages when becoming aware of additional resources the student has, such as external scholarships, which exceed the student's unmet need. Actions to balance need-based aid with unmet need include reallocating Federal Direct Subsidized Loans to Federal Direct Unsubsidized Loans and/or cancellation of some need-based aid.

PROCEDURE

The first measure taken to prevent over-awarding of need-based aid is defaulted within the Banner system, which is set to prevent over-awards when auto-packaging. For other resources that are entered or made known after packaging, the RORCALC report is run periodically to identify possible over-award situations.

A second measure to identify and resolve over-awards is through the RWPOVRAD (Potential Overaward Report) report in Banner. This report provides for the identification of potential need and cost of attendance overawards within a single payment period for resolution by college staff. This process will be completed at least two times each week.

Federal Pell grant awards are never reduced to resolve an over-award. Possible actions taken to resolve an over-award include reallocating Federal Direct Subsidized Student Loan to Federal Direct Unsubsidized Student Loan, reduction or cancellation of Campus-Based aid or other need-based aid (except Pell), or utilizing the \$300 tolerance for over-awards of Campus-Based funds. Iraq and Afghanistan Service Grants may be reduced if it alone exceeds a student's cost of attendance. The financial aid director or designated financial aid staff review the overaward.

9.10.1 RESOLVING AN OVERAWARD OR OVERPAYMENT WHEN STUDENT IS LIABLE

POLICY

All external scholarships, AmeriCorps, Vocational Rehabilitation, Health and Human Services, and employee benefits go through the Bursar's Office at Connecticut Community Colleges which is identified as a resource in RPAARSC. To resolve the over-award situation, the following actions may be taken:

- Increasing the student budget (if warranted)
- Using the \$300 allowable tolerance for Campus-Based funds
- Reducing or canceling awards in which case this is taken as a receivable to be collected from the student.

PROCEDURE

The Connecticut State Community Colleges take the following actions to correct an overaward or overpayment when the student is responsible:

- If a Federal Direct Student Loan has not been disbursed, it is cancelled or reduced to allow for the additional funds.
- If there is a determination the student had additional educational expenses, the student's budget may be increased as appropriate which may accommodate the difference.
- If the student has received one disbursement of a loan but not the second, the later disbursement will be cancelled to resolve the overaward.

Whenever the award is revised, this triggers a revised award notification to be sent to the student and logged into RUAMAIL. All instances of overpayment decisions are thoroughly logged into RHACOMM for reference.

9.10.2 RESOLVING AN OVERAWARD OR OVERPAYMENT WHEN SCHOOL IS LIABLE

POLICY

All external scholarships, AmeriCorps, Vocational Rehabilitation, Health and Human Services, and employee benefits go through the Bursar's Office at Connecticut Community Colleges which is identified as a resource in RPAARSC. To resolve the over-award situation, the following actions might be taken:

- Increasing the student budget (if warranted)
- Using the \$300 allowable tolerance for Campus-Based funds
- Reducing or canceling awards in which case this is taken as a receivable to be collected from the student.

PROCEDURE

The Connecticut State Community Colleges take the following actions to correct an overaward or overpayment when the student is responsible:

- If a Federal Direct Student Loan has not been disbursed, it is cancelled or reduced to allow for the additional funds.
- If there is a determination the student had additional educational expenses, the student's budget may be increased as appropriate which may accommodate the difference.
- If the student has received one disbursement of a loan but not the second, the later disbursement will be cancelled to resolve the overaward.

SECTION 10: PROFESSIONAL JUDGMENT

10.1 PJ AUTHORITY AND INDIVIDUALS WHO MAY EXERCISE IT

POLICY

Campus Supervisors and their designates have the authority to exercise professional judgment. Any required verification must be completed, and any conflicting or inconsistent information must be resolved before a professional judgment will be exercised. The decision made by the Director or designated staff member is final and cannot be appealed to ED.

PROCEDURE

Students wishing to be considered for professional judgment must submit a written request, along with the Special Circumstances Form to the financial aid office indicating the reason(s) they believe to be special circumstances. The form can be obtained by either going to the financial aid website or visiting the Financial Aid Office. In addition to completing the Special Circumstances Form, students (and parents if applicable) must provide supporting documentation to the Financial Aid Office to determine if the requested professional judgment is justified. Documentation may include, but is not limited to:

- Most recent federal tax returns
- W-2s
- Letter of explanation
- Termination notice
- Copy of unemployment record (if applicable)
- Most recent pay stub (if applicable)
- Disability award (if applicable)
- Any other notice of benefits determination (if applicable)
- Court records, death certificate or other legal documentation
- Childcare receipts or copy of childcare contract
- Medical expense receipts
- Third party verification for a dependency override
- Copy of divorce decree or leases verifying separate residences
- Current and previous years' federal tax returns; Current pay stub; Unemployment benefit documentation/layoff documentation
- Proof of reduction in hours worked
- Medical or dental bills not covered by insurance

For additional reference, please refer to:

- Budget Appeals: Section 8.6
- Packaging Appeals: Section 9.9.1
- SAP Appeals: Section 12.1

10.2 CIRCUMSTANCES FOR WHICH PJ ADJUSTMENTS ARE ALLOWED AND RESULTING ACTIONS TAKEN

POLICY

Financial Aid Office staff members can exercise discretion in certain areas when a student's family has special or unusual circumstances that are not adequately addressed by need analysis, regulations, or legislation. The HEA explicitly authorizes the financial aid administrator to exercise PJ in the following areas:

- Dependency status (dependent to independent only)
- Certain data elements used to calculate the expected family contribution (EFC)
- Cost of attendance (COA)
- Satisfactory academic progress (SAP)
- Direct Unsubsidized Loan eligibility for dependent students whose parents have ceased supporting the student financially, will not support the student in the future, and refuse to complete the Free Application for Federal Student Aid (FAFSA)
- Denial or reduction of Federal Direct Student Loan (Direct Loan) eligibility

The circumstances outlined as “special circumstances” by CT State include, but are not limited to:

- Loss of employment due to the termination, layoff, disability, retirement, company closing, plant shutdown, etc.
- Separation or divorce
- Death of an individual whose information was reported on FAFSA
- Documented excessive medical or dental expenses
- Childcare, dependent care, or elder care expenses
- Natural disasters impacting a family’s income or assets
- Conversions of traditional IRAs to Roth IRAs
- Family relationship where it is impossible or unsafe to collect parental information
- Parents enrolled at least half time in a degree, certificate, or other program leading to a recognized educational credential at an eligible institution (adjust EFC data element)

The following special circumstances will not be considered at CT State:

- An independent student cannot be made dependent
- Changes cannot be made to the Federal Methodology need analysis formula
- Bottom-line EFC adjustments cannot be made
- Costs incurred after students are no longer enrolled (e.g., graduate school admissions tests) cannot be added to the COA
- Home repairs
- Discretionary debt
- Previous education debt
- Mortgage/vehicle payments
- Voluntary reduction in employment income

PROCEDURE

After all documentation is collected, the Campus Supervisor or designated staff member will evaluate the material for professional judgment consideration. A second review of the appeal by another financial aid staff member is required. Each school can choose to structure the first and second review as they deem most appropriate for their office (for example: weekly meeting, Banner workflow, internal document routed between the two staff members). The professional judgment decision will be approved or denied based upon all information submitted.

If the professional judgment is approved, the financial aid administrator will make the necessary updates to the corresponding data element(s) on the ISIR from RNANAx and will check the professional judgment flag on RNANAx. The financial aid administrator must wait for the updated ISIR to load into the Banner system before revising the financial aid award.

For a dependency override, the financial aid administrator will make the changes directly in the Banner system or in FAA Access. If they make the change in FAA Access, the financial aid administrator must wait for the updated ISIR to load to the Banner system before revising the financial aid award.

If the review of the professional judgment results in an increase to the Cost of Attendance, the financial aid administrator will document the file, increase the COA on the budget screen (RBAPBUD) and offer additional financial aid if applicable.

In general, professional judgments related to child/dependent/elder care expenses will update a data element to update the EFC. The student may be awarded additional need-based grant funds, including Pell if applicable. In general, medical expenses will result in an increase to the COA. The student will be offered additional loan eligibility.

In general, professional judgments related to loss of income, divorce, or reduction in income will result in a change to a data element on the FAFSA, resulting in a decreased EFC. The student will be awarded Pell, or increased Pell, if eligible, campus-based aid, institutional grants if funding is available, or direct loans.

A revised award notification will be emailed to the student indicating any new or revised award amounts. The new financial aid award can be seen in the student's Banner Self-Service account.

10.3 REQUESTS FOR PJ CONSIDERATION

POLICY

Each college publishes on the individual school's websites and in the Student Handbook information regarding professional judgment considerations. The institutions require that students and parents of dependent students submit the completed Special Circumstances Form either electronically or by submitting it in person to the Financial Aid Office.

The email must be sent from the student's school email account and the message must be encrypted. Information received that is not encrypted and/or from personal email accounts will not be reviewed. Digital submissions may be utilized through <https://cscu.easy-forward.com>.

Requests for professional judgment and all supporting documentation can be turned in through the payment period but must be approved prior to the end of the payment period. Exceptions will be considered on a case-by-case basis. All appeals will be reviewed within 14 days after receipt of all required and supporting documentation. Response times may vary during high peak processing times.

Professional judgment requests made in subsequent years for the same set of circumstances will be reviewed and evaluated on a case-by-case basis.

PROCEDURE

The financial aid administrator will notify the student if the Special Circumstances Form is incomplete or additional supporting documentation is required. The financial aid administrator will work with the student and/or parents of dependent students until all required documentation is collected. If the student/parent(s) are unable to supply sufficient supporting documentation the professional judgment request will be denied.

After a decision has been made, the financial aid administrator will notify the student via email or mail of the professional judgment decision and impact the decision has on the student's aid eligibility. Any relevant notes, including the outcome of the appeal, should be documented in RHACOMM.

10.4 PJ DOCUMENTATION

POLICY

In addition to completing the Special Circumstances Form listed above, students (and parents of dependent students) must provide supporting documentation to the Financial Aid Office to determine if the requested professional judgment is justified. Documentation may include, but is not limited to:

- Most recent federal tax returns

- W2's
- Letter of explanation
- Termination notice
- Copy of unemployment record
- Most recent pay stub
- Disability award
- Any other notice of benefits determination
- Court records, death certificate or other legal documentation
- Childcare receipts or copy of childcare contract
- Medical expense receipts
- Third party verification for a dependency override
- Copy of divorce decree or leases verifying separate residences
- Current and previous years' federal tax returns
- Current pay stub; Unemployment benefit documentation/layoff documentation
- Proof of reduction in hours worked
- Medical or dental bills not covered by insurance

PROCEDURE

Refer to Section 10.2.

SECTION 11: DISBURSEMENTS

11.1 DEFINITION OF DISBURSEMENTS AND DISBURSEMENT METHODS

POLICY

CT State coordinates financial aid disbursements with Finance to deliver funds to students. Disbursement is defined as crediting the student's institutional billing account and subsequently delivering funds in excess of direct charges to the student. The system works under the "Advance Payment" method where federal funds are drawn down from G5 prior to disbursements to students. Within three (3) business days of the drawdown from G5, the colleges disburse Title IV aid and pay credit balances to students within 14 days of the balance occurring.

Disbursements are handled "in-house," delivering refunds to students either through direct deposit to identified bank accounts or by paper check. Title IV eligible recipients are not penalized for nonpayment of fees due to financial aid regulations or delays attributable to the school. Since disbursements are handled "in house," the colleges are not subject to Tier One or Tier Two disclosure regulations associated with use of a third-party servicer.

PROCEDURE

Until frozen enrollment occurs at the designated census date, financial aid awards are first packaged based on full-time enrollment. If a student enrolls at a less than full-time rate, the disbursement process will prorate the student's financial aid award according to the rules within each designated fund and based upon the student's current hours enrolled. RPEDISB (Disbursement) is run each night by way of automation, which will provide for this update, but colleges are able to complete this process at-will using ROAIMMP (Applicant Immediate Process). The disbursement process also transmits aid to the student's billing account as a credit. The Finance department then reviews student accounts to process any refunds to be delivered to students.

A separation of functions exists with the financial aid offices awarding aid and the financial side delivering aid to students. Ellucian maintains documentation that distinguishes the separation of duties between awarding and disbursement for compliance purposes:

"Ellucian met with folks from ED in policy as well as various other areas from FSA including some of their attorneys. The discussion was to help educate them on how software vendors operated with respect to this functionality. Ellucian carved out some overall examples and reference points for their understanding and allowed them to ask questions. Our overall advice to them was as long as clients have established their set up of the overarching security (the same person who establishes the application of payments and AR Detail Codes is not the same person who defines Fund Codes and processes financial aid within the Banner Financial Aid product). We helped them understand our training and consulting services, Ellucian Customer Support (ActionLine), and Development support. In particular, Ellucian shared with them how consultants go out and provide guidance to schools that are implementing our software. They were satisfied that our software accomplished a distinct separation of duties provided that schools adhere to specific procedures in establishing security across the systems. So even though it may appear to the untrained Banner observer that someone in financial aid is 'awarding and disbursing' federal funds, in fact there are built in areas specific to the separation of duties that our clients have the ability to leverage. This would be the case regardless of who kicked off the RPEDISB job (the financial aid administrator, the person over in student accounts receivable, the student via self-service product, or anyone else who may eventually have the ability to run the job knowingly or unknowingly).

Separation of Duties and the Disbursement Process in Banner

To the untrained eye, it may appear that there is no clear separation of duties because of the automation within Banner. If you look under the hood in the Banner system, it is clear when you are able to prove that the same people who have access to AR activities such as establishing detail codes (which include priority codes and the application of payments) and disbursement do not have the access to awarding. In turn, you must ensure that the same folks who have access to financial aid activities such as awarding and the disbursement process do not have access to establishing detail codes. The disbursement routine in Banner Financial Aid is a neutral routine that can be run by anyone, anywhere with the appropriate security access to produce the same results. By running disbursement you are only 'handing over the information' for Accounts Receivable to process. It is Account Receivable rules and established detail codes, priorities and application of payments that actually puts the money onto the accounts. The establishment of detail codes with priorities and application of payments as opposed to awarding is where the Banner system draws the line between separations of duties."

Providing Qualifying Title IV Students with Books and Supplies

The Central Office works in conjunction with the bookstore provider, Follett, to apply financial aid credit balances for books and supplies through a voucher system to all financial aid students. Students are allotted the lesser of the COA component or their assumed credit balance for use at the bookstore. This allowance is fed to Follett for each eligible student daily, with multiple updates throughout the day to accommodate changes. When a student makes a purchase against their aid, the charge is automatically fed to the student's account.

Students who utilize financial aid dollars at the bookstore will have any associated charges considered institutional charges, which will be included in any R2T4 calculation.

The bookstore process runs on the following schedule:

- **Fall Semesters:** July through October
- **Spring Semesters:** October to February
- **Summer Sessions:** May through July

11.1.1 DISBURSING TITLE IV FUNDS UNDER A T1/T2 ARRANGEMENT

POLICY

CT State processes all financial aid disbursements in house and are therefore exempt from T1 or T2 provisions. There is no associated procedure.

11.2 DISBURSEMENT DATES AND SCHEDULES

POLICY

The Connecticut State Community Colleges operate under a traditional calendar with fall and spring semesters comprising the standard academic year of at least 30 weeks. A summer session is established as a trailer to the standard academic year. The first disbursement for each term is made ten (10) days after the designated census date each traditional semester, noted as the 21st day for each Fall and Spring semester. A student's Pell Recalculation Date (PRD) is performed at the census date after the college's overall census is taken.

For students who do not have a PRD issued at the college's overall census date, further assessments to determine an individual student's date shall be taken using the designated Banner process RSRENRL.

Frozen enrollment for summer sessions is contingent on the number of modules within the session and generally takes place within the latest scheduled module of the summer session. The enrollment status for a student is held or frozen at the status for this day and federal aid is calculated based upon this status.

Institutions will make late disbursements, including retroactive payments for completed payment periods. A retroactive payment will be made to a student currently enrolled for whom there was a delay in processing an award for a valid ISIR.

A post-withdrawal disbursement will be made to a student no longer enrolled for the period earned or completed while enrolled. The financial aid office uses monitoring reports to identify which students might be subject to a retroactive for post-withdrawal disbursement.

PROCEDURE

Until frozen enrollment occurs at the designated census date, financial aid awards are first packaged based on full-time enrollment. If a student enrolls at a less than full-time rate, the disbursement process will prorate the student's financial aid award according to the rules within each designated fund and based upon the student's current hours enrolled. RPEDISB (Disbursement) is run each night by way of automation, which will provide for this update, but colleges are able to complete this process at-will using ROAIMMP (Applicant Immediate Process). RPEDISB also transmits aid to the student's billing account as a credit. The Finance department then reviews student accounts to process any refunds to be delivered to students. A separation of functions exists with the financial aid offices awarding aid and the financial side delivering aid to students.

The college's overall census is taken at the 21st calendar day of each traditional Fall and Spring semester and is automatically run centrally by the system office IT staff. Immediately following, student Pell Recalculation dates are made using the RSRENRL process in Banner, which is also run by the system office IT staff. Winter and Spring RSRENRL jobs are run concurrently since winter credit hours are included in spring enrollment. The RSRENRL job finalizes and locks a student's credit hour enrollment for disbursement.

For students who do not have a FAFSA on file at the time of census, or for students who first enroll in late start courses after census, RSRENRL must be run subsequent times in Add Mode to create a PRD for students without the recalculation.

Disbursement of aid occurs ten (10) calendar days from the census date. If the disbursement date falls on a weekend, the disbursement date is the Monday following the 10th day after census. Students are notified of all disbursement information including dates on which refunds will be delivered.

11.3 STUDENT AND PARENT AUTHORIZATIONS

POLICY

CT State collects authorizations from students (or parents in the case of parent PLUS loans), which allow the school to:

- Disburse Title IV funds by crediting the student's account to pay educationally related goods and services at the college bookstore.
- Disburse Title IV funds (other than FWS) by crediting the student's institutional ledger account to pay allowable current year educationally related institutional charges other than tuition, fees, and contracted room and board.
- Disburse Title IV funds (other than FWS) by crediting the student's institutional ledger account to pay allowable prior award year educationally related institutional charges other than tuition, fees, and contracted room and board.
- Hold excess Title IV funds on the student's institutional ledger account.

These authorizations are collected and retained by the Finance Department and are available for student completion within Banner Self-Service. In a coordinated effort with the Finance Department, the Financial Aid Office will help students on how to complete the authorization form.

PROCEDURE

A Title IV Authorization is available for students to complete in Banner Self-Service. There are two tracking requirements that will post in RRAAREQ, which are not required for packaging or disbursement.

- PY: Title IV Authorization for Prior Year Charges up to \$200
- TIV: Title IV Authorization for Non-Institutional Charges

The Title IV Authorization link is always available in Banner Self-Service for a student to complete or update. Responses are logged in TVAAUTH and tracking requirement statuses are automatically updated in RRAAREQ.

11.3.1 DISBURSING FWS FUNDS TO PAY CURRENT AWARD YEAR, INSTITUTIONAL CHARGES FOR TUITION, FEES, CONTRACTED ROOM & BOARD, AND OTHER ALLOWABLE, EDUCATIONALLY RELATED EXPENSES

POLICY

Institutions do not disburse FWS funds to pay current award year institutional charges. Therefore, authorizations are not collected.

PROCEDURE

N/A

11.3.2 DISBURSING FWS FUNDS TO PAY ALLOWABLE, PRIOR YEAR, INSTITUTIONAL CHARGES

POLICY

The Finance Department is responsible for reviewing student accounts to determine if federal aid can be applied to allowable institutional charges.

PROCEDURE

After aid is transmitted through the disbursement process, the finance department reviews students accounts and determines refund amounts which are placed on the student accounts. Refunds are processed in-house and delivered through direct deposit to the student's identified checking account or mailed as a paper check within 14 calendar days.

11.3.3 DISBURSING TITLE IV FUNDS (OTHER THAN FWS) TO PAY ALLOWABLE, CURRENT YEAR, EDUCATIONALLY RELATED, INSTITUTIONAL CHARGES OTHER THAN TUITION, FEES, AND CONTRACTED ROOM & BOARD

POLICY

Colleges use an online form to collect authorization from students to pay educationally related institutional charges other than tuition and fees as provided in Banner Self-Service.

PROCEDURE

The Finance Department collects authorization information from students through an online form the student completes. The Banner system is set to exclude non-allowable charges for which the student has not provided authorization when determining a refund owed to the student.

11.3.4 DISBURSING TITLE IV FUNDS (OTHER THAN FWS) TO PAY ALLOWABLE PRIOR AWARD YEAR, EDUCATIONALLY RELATED, INSTITUTIONAL CHARGES OTHER THAN TUITION, FEES, AND CONTRACTED ROOM & BOARD

POLICY

Colleges use an online form to collect authorization from students to pay up to \$200 of allowable prior award year charges. This authorization is available to students within Banner Self-Service.

PROCEDURE

If a student has given authorization to use current award year funds to cover an allowable prior award year, the Finance Department will first ensure there are funds available in excess of the current year charges to retroactively pay up to \$200 of a previous award year balance.

11.3.5 HOLDING EXCESS TITLE IV FUNDS (CREDIT BALANCES)

POLICY

Colleges collect authorizations from students to hold until the end of the term excess Title IV funds during a term for a future charge if the student has authorized this action to occur. The authorization is available to students within Banner Self-Service and may be amended at any time.

PROCEDURE

After a student's aid has been credited to their student account and during the review of student accounts, a refund would not be processed if a student has requested through the authorization form funds be held for future charges. The refund is processed and released by the end of the term if no additional charges have been incurred.

11.3.6 DISBURSING TITLE IV FUNDS UNDER A T1 OR T2 ARRANGEMENT

POLICY

Not applicable. All Connecticut State Community Colleges handle all disbursement actions in-house.

PROCEDURE

N/A

11.4 STUDENT AND PARENT NOTIFICATIONS

CT State notifies students and parents of disbursement timeframes through the student portal and through a published FAQ information. For Title IV loans, students and parents are sent a Right to Cancel notice through an automated letter generation process at the time of disbursement.

11.4.1 AMOUNTS OF EXPECTED TITLE IV FUNDS AND DISBURSEMENT INFORMATION

POLICY

Students are made aware of their financial aid awards, including disbursement amounts, through Self-Service Banner. In addition, the Business Office provides a notification to students of their disbursement amounts. Students are notified of loan disbursements by a letter sent to them. The letter provides information on the Right to Cancel, early repayment on the student loan, and the approximate time frame the refund will be available to the student.

PROCEDURE

Colleges send automated messages to students indicating disbursement amounts at each occurrence. Colleges also send an automated Right to Cancel notification to students when a loan is disbursed to the student's account. These communications are logged into RUAMAIL.

11.4.2 CREDITING TITLE IV LOAN PROCEEDS AND THE BORROWER'S CANCELLATION RIGHT

POLICY

All students who accept a federal direct student loan are sent a Right to Cancel when their federal student loan is disbursed to their student account.

PROCEDURE

Colleges send an automated Right to Cancel notification to students when a loan is disbursed to the student's account. These communications are logged into RUAMAIL.

11.4.3 CREDITING TEACH GRANT FUNDS AND THE STUDENT’S CANCELLATION RIGHT

POLICY

CT State does not administer TEACH funds.

PROCEDURE

N/A

11.5 UNDELIVERABLE TITLE IV FUNDS

POLICY

Unclaimed property consists of checks never cashed and negative accounts receivable balances. Federal regulations (Blue Book) stipulate that Title IV aid cannot be escheated but must be returned to the US Department of Education. Refunds for the financial aid year, determined to include Title IV aid, will be handled separately via Financial Procedure 5.26 (Refunds). Refunds will be considered Title IV refunds if aid exceeds the charges (for a single aid year). After Title IV aid is returned, any remaining balance of the refund, considered non-Title IV aid, will be marked for escheatment to the State of Connecticut in the appropriate year.

PROCEDURE

Refunds will be considered Title IV refunds, if the Title IV aid exceeds the charges (for a single aid year). Students, who have un-cashed Title IV refund checks, will be notified (via letter and e-mail, if possible) that a check was cut and mailed to them which has not yet been cashed. If the student does not contact the college or cash the check by the specified date, the check will be cancelled, and the funds returned to the Federal Aid program from which they originated.

The process outlined below, will run twice a year, in May, and August:

- Letters and emails are sent.
- Students will be given a date by which to respond.
- Following that, checks will be cancelled, and any non-Title IV aid portion marked for future escheatment.
- The Financial Aid Office receives a list of impacted students.
- The Financial Aid Office reduces student awards in 2-3 business days.

11.6 RECOVERY OF TITLE IV DISBURSEMENTS WHEN STUDENT DOES NOT BEGIN ATTENDANCE

POLICY

The BOR's "Policy on Grading, Notations, and Academic Engagement" includes a Never Participated (NP) enrollment status, which is assigned for students who are determined to have not academically engaged in the period of enrollment leading up to the census date. Courses with an NP designation are not counted toward a college's official census and are not eligible to receive financial aid for courses assigned this status.

PROCEDURE

This policy requires the assignment of the NP enrollment status for students who have not engaged in an academically related activity during the period preceding and up to the census date of the period of enrollment. Students with this designation will not have aid calculated for any affected course.

SECTION 12: SATISFACTORY ACADEMIC PROGRESS

12.1 PROCESS OVERVIEW AND RESPONSIBILITIES

The BOR maintains a policy on Satisfactory Academic Progress related to financial aid.

[Satisfactory Academic Progress Policy for Student Financial Aid Recipients at CSCU Community Colleges](#)

Federal regulations require that a student receiving financial aid under the Title IV programs make satisfactory academic progress (SAP) in accordance with the standards set by the Board of Regents, and the US Department of Education pursuant to 34 CFR 668.34. The contents of this policy were approved by the Board of Regents on April 7, 2016, and are effective for periods of enrollment subsequent to the Spring 2017 semester. The SAP requirements are implemented by the Financial Aid Office at each CSCC college. Questions concerning this policy should be addressed to Directors of Financial Aid Services at the attending Connecticut State Community Colleges.

In order to maintain eligibility for financial aid, students must be making satisfactory progress towards completion of their degree or certificate program. Recipients of financial aid under the Title IV programs, state aid and/or other financial aid programs directly administered or certified by the CSCC colleges must meet the minimum SAP standards in order to continue to be eligible for aid. Some certificate programs are not eligible for financial aid and therefore the minimum SAP standards do not apply to students matriculating in those programs.

The minimum SAP standards are set in order to ensure that students complete their program and successfully graduate with the minimum cumulative grade point average of 2.0 required for graduation, within the maximum timeframe allowed by federal law. A student's cumulative academic history is evaluated at the end of each payment period/semester, including the summer term, and prior to the subsequent term's financial aid disbursement.

SAP is administered by the Financial Aid Director or designated staff member at the individual college at the end of each term after grades are due. The Financial Aid Office collaborates with the Registrar to ensure that this deadline has passed, and the Registrar has run the appropriate processes to post grades. The process is automated in Banner and is customized for CSCC. Basic procedures are included in this policy and procedure manual.

The college Directors of Financial Aid Services will bring policy and procedure issues which require addressing to the attention of the Associate Vice President of Financial Aid at the CSCC Central Office.

Below are the Financial Aid SAP statuses used in Banner at CSCC and the impact on packaging and disbursement of each status.

FINANCIAL AID SAP STATUSES IN BANNER

SAP Code	SAP Status	Description	Impact
EXCPTN	Exception	Default SAP status used when SAP cannot be calculated. Various reasons include lack of admission and non-credit status	Prevents packaging and disbursement
INTAID	Institutional Aid Only	Institutional Aid only allowed	Prevents packaging and disbursement of federal and state aid
MAXHRS	Maximum Hours Reached	Student has met/exceeded the maximum number of attempted credits in accordance with the SAP policy	Prevents packaging and disbursement
NOHIST	No Academic History	The student does not yet have rolled grades in the Banner Student tables	Allows packaging and disbursement
NOTREV	Not Reviewed	The default initial SAP status assigned to students during the ISIR dataload process who do not have a previous SAP status calculated. This status will update to another status upon running the SAP calculation.	Prevents packaging and disbursement
NOTSAP	Unsatisfactory Progress	Student is not meeting the standards of the SAP policy	Prevents packaging and disbursement
PROBWV	Probation/Waiver	Student was assigned NOTSAP or MAXHRS, but successfully appealed to regain eligibility for aid with consideration for an academic plan	Packaging and disbursement allowed
SATPRG	Satisfactory Progress	Student is meeting the standards of the SAP policy	Packaging and disbursement allowed
WARN	Warning	The student has failed to meet the standards of the SAP policy for the first time, and is given one additional payment period to meet the designated level of progression	Packaging and disbursement allowed

Note: Packaging is only prevented if the student has not already been packaged in Banner for the award year. Disbursements made prior to the update of the student's SAP status however will be reversed when the SAP status is updated.

12.2 SAME OR STRICTER THAN

POLICY

As required by federal law, the SAP standards for financial aid recipients is at least as strict as or stricter than the college's standards for good academic standing as shown below and meeting CSCC's minimum GPA requirement for graduation of 2.0.

The BOR's Academic Progress Policy (different than the SAP Policy) provides for an academic warning to students who have attempted less than 12 credits and have earned a 1.49 cumulative GPA or less. The Region I office of ED

reviewed this approach and these standards in comparison to the financial aid SAP standards and provided a written response to confirm that the SAP standard meets the requirement to be “at least as strict” as the academic standard for good standing. This document is retained and is available upon request.

The SAP policy is reviewed annually by the Associate Vice President for Financial Aid Services & Title IV Compliance at the CT State Central Office for compliance with federal law, including the “at least as strict as” requirement. If any updates are required, the policy will undergo a review process at the CSCC Central Office for approval by the Vice President for Enrollment Management, the BOR Academic and Student Affairs Committee, and ultimately the BOR.

Any new policy will be formally communicated to the Financial Aid Directors at each college, with training provided as appropriate, system changes planned for and implemented, and the new standards formally communicated to students and the campus community prior to implementation of the policy.

CSCC Standards for Good Academic Standing (*applies to all students including those not receiving aid*)

Credits Attempted	Minimum Cumulative GPA	Minimum Pace Requirements
0 - 11.99	0.0	0%
12 - 30.99	1.7	50%
31+	2.0	50%

SAP Standards for Certificate Seeking Financial Aid Recipients

Credits Attempted	Minimum Cumulative GPA	Minimum Pace Requirements
0 - 11.99	0.0	0%
12+	2.0	67%

SAP Standards for Degree Seeking Financial Aid Recipients

Credits Attempted	Minimum Cumulative GPA	Minimum Pace Requirements
0 - 11.99	0.0	0%
12 - 30.99	1.7	50%
31 - 49.99	2.0	50%
50 - 59.99	2.0	60%
60+	2.0	67%

PROCEDURE

Both academic standing and satisfactory academic progress are assessed at the conclusion of each period of enrollment (fall, winter, spring, summer). A review of the benchmarks for both GPA and Pace that demonstrate adherence to the “as strict or stricter than” requirement are noted below.

STANDARD FOR GOOD ACADEMIC STANDING (ALL STUDENTS)

Credits Attempted	Minimum Cumulative GPA	Minimum Pace
0 – 11.99	0.0	0%
12 – 30.99	1.7	50%
31+	2.0	50%

SAP STANDARD FOR CERTIFICATE SEEKING STUDENTS (FINANCIAL AID ONLY)

Credits Attempted	Minimum Cumulative GPA	Minimum Pace
0 – 11.99	0.0	0%
12+	2.0	67%

SAP STANDARD FOR DEGREE SEEKING STUDENTS (FINANCIAL AID ONLY)

Credits Attempted	Minimum Cumulative GPA	Minimum Pace
0 – 11.99	0.0	0%
12 – 30.99	1.7	50%
31 – 49.99	2.0	50%
50 – 59.99	2.0	60%
60+	2.0	67%

12.3 CATEGORIES OF STUDENTS

POLICY

All institutions serve undergraduate students only. The categories of students that require monitoring for SAP include associate degree students and undergraduate certificate students. Students are not monitored differently under SAP by enrollment status, as the SAP standards are cumulative measures.

PROCEDURE

Certificate-seeking students have different minimum SAP standards to meet than the degree-seeking students due to the shorter length of their program. The minimum SAP requirements for both categories of students are programmed into Banner and are monitored via the Banner SAP procedure.

12.4 QUALITATIVE MEASURE

POLICY

The qualitative measures for SAP are cumulative and have graduated GPA standards. Evaluation of the GPA standard occurs upon the student's initial receipt of an ISIR at the institution, at the end of each term of enrollment.

QUALITATIVE SAP STANDARDS FOR CERTIFICATE SEEKING FA RECIPIENTS

Credits Attempted	Minimum Cumulative GPA
0 - 11.99	0.0
12+	2.0

QUALITATIVE SAP STANDARDS FOR DEGREE SEEKING FA RECIPIENTS

Credits Attempted	Minimum Cumulative GPA
0 - 11.99	0.0
12 - 30.99	1.7
31 - 49.99	2.0
50 - 59.00	2.0
60+	2.0

At the end of each term after the SAP procedure is completed, students not meeting the minimum SAP requirements receive a general email communication to their official college email address directing them to review Banner Self-Service for further information.

PROCEDURE

SAP is administered by central office staff at the end of each term after grades are rolled by the Registrar. The Financial Aid Office collaborates with the Registrar to ensure that this deadline has passed, and the Registrar has run the appropriate processes to post grades. The process is automated in the Banner system. Detailed procedures can be found in the Satisfactory Academic Progress in Banner procedure maintained by the central office.

RWPSAPR (SAP Assignment Process) is the customized process that shells the delivered ROPSAPR (SAP Assignment) calculation process with the automatic generation of a report and update of the student's SAP status in Banner. The batch process is run by term. The calculation will occur for all students with a FAFSA on file (with data in the Banner Financial Aid RORSTAT table) in the applicable award year.

The RWPSAPR process produces an output report, which allows the financial aid administrator to review both a student's Previous SAP and Current SAP (status for the term the process was run) status. The report also includes attempted and completed credits, pace percentage, and Inclusive GPA. The Inclusive GPA is cumulative for all coursework throughout a student's academic career at the college and differs from a student's academic GPA. This output report serves as a record of how SAP was assessed for each student, and is also used to identify students who need a manual evaluation of their SAP status, including:

1. Students on Probation who aren't meeting the minimum SAP standards but may be meeting the minimum terms of an academic plan.
2. Students with an Exception status whose SAP progress was not evaluated in Banner for various reasons and need to be reviewed and manually evaluated.

SAP Report (RWRXS01)

This is a report that may be run at any time for any semester. This report will detail the output of RWPSAPR, but without performing a calculation on any student.

SAP Letters

Letters are generated out of Banner using the ROREMAL page. Each letter type is setup in RORELTR, which includes SAP Letters.

12.5 QUANTITATIVE MEASURE

POLICY

The quantitative measure for SAP includes two parts, Pace and Maximum Timeframe.

PROCEDURE

The procedures for evaluating all three components of SAP are a single customized Banner process. Refer to 12.5.2, 12.5.3 and 12.5.4 for procedures for each measure.

12.5.1 MAXIMUM TIME FRAME

POLICY

Students may receive financial aid for any attempted credits in his/her program of study that do not exceed 150% of the published length of the student's educational program at CT State. For example, students enrolled in a 60-credit degree program may receive financial aid for a maximum of 90 attempted credit hours. Similarly, students enrolled in a 30-credit certificate program may receive financial aid for a maximum of 45 attempted credit hours. All attempted credits at the college are included in the calculation. The 150% maximum credit hours rule is applicable to students who change majors, programs, or who pursue a double major. The college does not reset the number of attempted credits if a student changes their program of study.

At the end of each term after the SAP procedure is completed, students not meeting the minimum SAP requirements receive a general email communication to their official college email address directing them to review Banner Self-Service for further information.

PROCEDURE

The procedures for evaluating all three components of SAP are a single customized Banner process. Refer to Section 12.4 under Qualitative Measure for the further information on the procedures to identify students not meeting the minimum standards and the procedures for communicating SAP status to students.

12.5.2 PACE

POLICY

The qualitative measures for SAP are cumulative and graduated GPA standards. Evaluation of the pace standard occurs upon the student's initial receipt of an ISIR at the institution, at the end of each term of enrollment.

PACE STANDARDS FOR CERTIFICATE SEEKING FINANCIAL AID RECIPIENTS

Credits Attempted	Minimum Pace Requirement
0 - 11.99	0%
12+	67%

PACE STANDARDS FOR DEGREE SEEKING FINANCIAL AID RECIPIENTS

Credits Attempted	Minimum Pace Requirement
0 - 11.99	0%
12 - 30.99	50%
31 - 49.99	50%
50 - 59.99	60%
60+	67%

At the end of each term after the SAP procedure is completed, students not meeting the minimum SAP requirements receive a general email communication to their official college email address directing them to review Banner Self-Service for further information.

PROCEDURE

The procedures for evaluating all three components of SAP are a single customized Banner process. Refer to Section 12.4 under Qualitative Measure for the further information on the procedures to identify students not meeting the minimum standards and the procedures for communicating SAP status to students.

12.6 EVALUATION PERIODS

POLICY

The evaluation periods are defined by the standard term payment period for all programs.

PROCEDURE

CT State evaluates both the qualitative and pace components of SAP after every period of enrollment (fall, winter, spring, and summer).

12.6.1 FINANCIAL AID WARNING

POLICY

Students who fail to meet the minimum satisfactory academic progress standards for the first time will be placed on Warning for one term, and only once during their academic career at the college. Students on Warning are eligible to receive financial aid for one additional payment period. Students on Warning who fail to meet the minimum SAP standards at the end of the Warning term are ineligible for financial aid for subsequent terms of enrollment and are placed on Unsatisfactory Progress.

The college will communicate a status of Unsatisfactory Progress to students and provide information about the available Appeal process via email.

The Warning period will be the student's next semester or period of enrollment at the college. The college will communicate the Warning status to these students and inform them that they must meet the academic progress standard by the end of the subsequent enrollment period in order to maintain eligibility to participate in the financial aid programs at the college.

Students on Warning who meet the minimum SAP standards at the end of the Warning term are eligible to continue receiving financial aid for subsequent terms of enrollment as long as the student continues to meet the minimum SAP standards and all other eligibility requirements.

Those students who meet the minimum SAP standards after a Warning period but at a later date fail again to meet the minimum SAP standards are ineligible for financial aid at that point and placed directly onto Unsatisfactory Progress status.

PROCEDURE

The procedures for evaluating all three components of SAP are a single customized Banner process at the CCCC colleges. Refer to Section 12.4 under Qualitative Measure for the further information on the procedures to identify students not meeting the minimum standards and the procedures for communicating SAP status to students.

Students on Financial Aid Warning status will receive notification via email. A student's SAP information is available within Self-Service Banner.

12.6.2 FINANCIAL AID PROBATION

POLICY

Students on Unsatisfactory Progress status who submit an appeal of that status, and whose appeal has been approved, regain financial aid eligibility for one term on a probationary status. The terms of the student's Financial Aid Probation are set by the college during the Appeal Process.

At the end of the probationary semester, the student's academic progress will be evaluated. If the student has met the minimum SAP standards, the student's SAP status is updated to "Satisfactory Progress." If the student has not met the minimum SAP standards but is meeting the required terms of the academic plan, the student may continue to receive financial aid in the following semester by way of a continued probationary period.

If the student fails to meet the terms of the academic plan in any subsequent semester, the student will become ineligible to receive aid from any financial aid program at the college until the student is able to once again meet the minimum requirements for academic progress. Student progress will continue to be monitored at the end of each semester with the same terms in place until the student is in compliance with this policy.

Students on Financial Aid Probation status will receive notification via email. Students who effectively regain eligibility after a Probation period will have their status updated to "Satisfactory Progress" in accordance with the policy. A student's SAP information is available within Self-Service Banner.

PROCEDURE

The procedures for evaluating all three components of SAP are a single customized Banner process at the CCCC colleges. Refer to Section 12.4 under Qualitative Measure for the further information on the procedures to identify students not meeting the minimum standards and the procedures for communicating SAP status to students.

The progress of students on Financial Aid Probation who have not met the minimum SAP standards is evaluated manually to determine if the student is meeting the term of their academic plan. Students requiring this evaluation are identified via the output report from the RWPSAPR program. The steps are as follows:

1. These students are identified in the output of RWPSAPR as those with a prior term value of Probation (PROBWV) and current term value of Unsatisfactory Progress (NOTSAP).
2. This cohort of students is manually reviewed to determine which were on an academic plan.
3. Those on academic plan are evaluated manually to determine if the student has successfully met the minimum terms of the academic plan which was approved with the appeal.
 - If yes, the student will be placed back on Probation status (PROBWV) and continue to be eligible for financial aid for the next term of enrollment. The financial aid administrator will manually update the student's SAP status in Banner.
 - If no, the student will remain on either the Unsatisfactory Progress or Maximum Hours Reached status and be ineligible for aid. Those students will receive an email communication. Refer to Section 12.4 for the associated procedure.

12.7 APPEALS

POLICY

Students who are not eligible for financial aid due to not meeting the SAP requirements may request consideration for reinstatement of eligibility through the Appeal Process if the student's failure to meet SAP was the result of an unusual or extraordinary situation. Examples of personal mitigating circumstances could include illness or injury of the student or a dependent of the student, a death in the family, or other undue hardship as the result of special circumstances. This is completed by way of a SAP Appeal Form.

Only complete appeals are reviewed by a committee of at least two members, including one representative from financial aid. If an appeal is incomplete, the student will be notified in writing. The committee's decision is final and not subject to further appeal to a higher authority. The committee may meet in person or virtually.

There is no limit to the number of appeals that a student can submit, but a student can only appeal once per term. Students submitting an appeal in a subsequent term of not meeting SAP should have a different reason for not meeting the minimum SAP requirements or terms of their academic plan and a new plan for improving their academic performance, per federal guidance.

If the student's appeal is approved, the student will regain eligibility for financial aid on a probationary status for one term of enrollment.

If the student's appeal is denied and the student is already registered for the upcoming semester, the student is responsible for any monies owed to the college. If the student pays for the next semester, the student may appeal again after that semester.

SAP Appeals should be responded to within 14 days of receipt to provide students with adequate time to make enrollment decisions, but this does not preclude the committee from reviewing appeals on a rolling basis, especially if appeals are reviewed in a virtual environment.

PROCEDURE

Steps for a student to submit a SAP Appeal:

1. Complete the SAP Appeal Form, which is available on the College financial aid office websites.
2. Include a written explanation of the extenuating circumstance, including what has changed.
3. Provide third-party documentation to substantiate the written explanation.
4. Submit the appeal form to the financial aid office.

Should a review of the appeal determine that the student is not able to meet the contents of the SAP policy in one semester, an academic plan is required to gradually bring the student back into good standing. The committee is comprised of at least three members, one of which must be a member of the financial aid staff. The committee can meet in person or virtually to discuss the appeals together or may individually review the appeals and submit decisions independently, depending on the needs of the individual college. SAP appeals will be reviewed and responded to within 14 days.

When a SAP appeal is approved, the FAA must complete the approval process by making the following updates in Banner:

1. Document the receipt of the SAP Appeal Form within RRAAREQ.
2. Update the New SAP Status field to PROBWV for the term(s) during which this status was granted.
3. Check the Lock indicator for the probationary term.
4. Note that the SAP appeal was approved via a comment in RHACOMM.

Students receive notification of the appeal decision in writing via email. Refer to section 12.4 for procedures for SAP communications in Banner.

Students remain on probation one term at a time, with the exception of the winter intersession which is part of the spring payment period.

12.7.1 DOCUMENTATION

POLICY

Adequate documentation is essential to substantiate the reasons the student is submitting for consideration in their appeal both for the reasons why the student failed to make progress and what has changed that will make it possible for the student to achieve SAP over the next term(s) of enrollment. Acceptable documentation for students to submit with an appeal include newspaper obituaries or death certificates to substantiate deaths, physician's written statements to substantiate illness or accidents, and/or written statements from clergy, family members, high school counselors, academic advisors, faculty or others who know the student's situation.

PROCEDURE

All SAP appeals and documentation are maintained at the college in the student's file.

When a completed appeal is received, it is noted in the Banner system and the appeal is added to the imaging system. The appeal is added to a workflow to be addressed by the college Director of Financial Aid or designee. If the appeal is not complete, Banner is updated to reflect that, and the student is notified of the additional documentation required.

12.7.1 ACADEMIC PLANS

POLICY

Students who submit a SAP appeal are required to have met with an academic advisor and have developed an academic plan. The purpose of an academic plan is to support the student in bringing himself or herself back into compliance with the financial aid SAP standards by a specific point in time in order to ensure that the student will be able to successfully complete the degree or certificate program within the maximum timeframe. An example of typical terms of an academic plan may include, but is not limited to:

1. Register and successfully complete a minimum of six (6) credits; and
2. Successfully complete these courses with a minimum of a 2.0 GPA.

PROCEDURE

The financial aid office staff manually evaluates the student's progress at the end of the subsequent term of enrollment as described in Section 12.6.2. If the student is not yet meeting the minimum SAP standards but has met the required terms of the academic plan, the student may continue to receive financial aid in the following semester.

If the student fails to meet the terms of the academic plan in any subsequent semester, the student will become ineligible to receive aid from any financial aid program at the college until the student is able to once again meet the minimum requirements for academic progress.

Students on an academic plan will continue to be monitored at the end of each semester with the same terms in place until the student is in compliance with this policy.

12.8 REGAINING ELIGIBILITY

POLICY

A student's financial aid eligibility will be automatically reinstated at the time the student meets the minimum satisfactory academic progress standard.

Students regain eligibility for financial aid in two ways:

- Submit an appeal and the appeal is approved.
- Continue to enroll and pay their charges with funds other than financial aid, and once the student has improved sufficiently and is meeting the minimum SAP standards, the student's eligibility for financial aid will be reinstated.

PROCEDURE

Refer to Section 12.4 for associated procedures.

12.9 TREATMENT OF NONPUNITIVE GRADES, REPEATED COURSES, AUDITED COURSES, PASS/FAIL COURSES, WITHDRAWALS, AND INCOMPLETES

POLICY

TREATMENT OF ADMINISTRATIVE TRANSCRIPT NOTATIONS IN THE DETERMINATION OF FINANCIAL AID SAP STATUS:

1. Withdrawal (W): Course withdrawals are not included in the GPA calculation and are considered a non-completion of attempted work.
2. Incomplete (I): Incomplete courses are not included in the GPA calculation and are considered a non-completion of attempted work.
3. Audit (AU): Audited courses are not eligible for financial aid and are not included in the GPA calculation nor considered as attempted coursework.
4. Pass (P): Passing grades in a pass/fail option are treated as attempted credits which are earned but are not included in the calculation of the GPA.

5. Unearned F (UF) or No Grade (N): These historical notations for “unofficial withdrawals” for students who did not attend through the entire term are treated as attempted credits that were not earned and are included in the calculation of GPA as zero points earned.
6. Maintaining Progress (M): Used in developmental courses are similar to an incomplete grade and are treated as attempted credits that were not earned and are not included in the calculation of GPA.
7. Transfer (TR): All transfer credits added into the Banner system for a student are treated as attempted coursework which has been earned but are not included in the calculation of the GPA.

FAILING (F) GRADE

All failed grades are treated as attempted credits that were not earned and are included in the calculation of GPA as zero points earned. Beginning in 2020-21, all F-grades are assigned a last date of participation to assist in the identification of unofficial withdrawals.

GRADE CHANGES

Grade changes and updates such as grades reported that were not previously submitted and Incomplete grades that are updated with a final grade will be updated in student’s SAP status at end of the subsequent term of enrollment when SAP is evaluated again.

REPEAT COURSEWORK

Financial aid recipients are limited to one repetition of a previously passed course in their program of study. The second repetition of a previously passed course will not be eligible for financial aid payments.

PROCEDURE

The SAP procedure in Banner, RWPSAPR, is set up to treat each type of grade and situation noted herein as described in policy. The process is fully automated.

12.10 TREATMENT OF REMEDIAL, ENRICHMENT, AND ENGLISH AS A SECOND LANGUAGE COURSES

POLICY

Developmental and ESL coursework are included in both the calculation of the qualitative and pace components of SAP.

PROCEDURE

The staff manually evaluates the 30 attempted credits of developmental coursework to ensure that students do not receive aid for attempted coursework beyond that point. Assistance from the Registrar is required in identifying and reviewing this population.

12.11 TREATMENT OF CONSORTIUM, CHANGE OF MAJOR, SECOND DEGREE, AND SECOND MAJOR COURSES

POLICY

CONSORTIUM AGREEMENTS

All coursework taken at other colleges under a consortium agreement are required to be transferred to the institution at the end of the term of enrollment. The credits are treated as credits attempted and earned for passed coursework. This coursework is not included in GPA calculations since incoming credits would be treated as transfer credits.

CHANGE OF MAJOR/PROGRAM AND SECOND MAJORS

For students who change majors or change between certificate and degree programs, the student's cumulative academic history is still included in the determination of the student's SAP status for financial aid eligibility. All prior coursework is included in the determination of Pace and in the cumulative GPA calculation in determining the student's SAP standing. Federal law does not allow for consideration of an "academic amnesty" for returning students with or without a change of major/program. However, the colleges do offer an overall amnesty program for certain students (Fresh Start).

SECOND DEGREE STUDENTS

Second degree transfer students are treated the same under the SAP requirements as other transfer students. Second degree students who completed their degree at CSCC are treated the same under SAP as a Change of Program student. All prior coursework is included in the determination of Pace and in the cumulative GPA calculation in determining the student's SAP standing.

PROCEDURE

The Financial Aid Director or designated staff member at each college is responsible for running the SAP processes and monitoring SAP for their students. Consortium students are monitored to ensure that all completed coursework is transferred back to the college at the end of the term.

Change in major/program students and second-degree students do not require additional procedures as they do not require different treatment or additional monitoring under the SAP policy than other students.

12.12 COMPLETION OF DEGREE REQUIREMENTS

POLICY

Once a student has completed all requirements for graduation, the student is ineligible for further federal aid, even if the student has not applied for graduation and/or the degree has not yet been conferred.

PROCEDURE

This is monitored manually. Banner is updated to reflect the degree completion status and the student is ineligible to receive further financial aid as a matriculating student in that program. Assistance from the Registrar may be required as needed.

12.13 NOTICES

POLICY

CT State's SAP policy is a board-approved policy and is publicly available. The financial aid office makes the SAP policy available to students through the college website, the myCTstate platform, and through direct email notifications to students. This policy is also provided in our Financial Aid Guidebook, as well as the CT State Student Handbook.

PROCEDURE

The distribution channels for delivering the SAP policy to students is reviewed annually at the setup for the following year is conducted, as well as on an as-needed basis throughout the award year.

12.14 ADVISING REQUIREMENT

POLICY

The SAP advising requirement is not a part of the SAP qualitative or pace standard. It is an additional advising requirement within the SAP policy. Students falling below a cumulative GPA of 1.7 and/or a minimum cumulative pace of 50% are required to meet with advising staff prior to registering for applicable coursework. This includes students who have attempted less than 12 credits of coursework. Students falling within this GPA threshold are assigned a SAP Advising Hold, which prevents registration until such time as the student can meet with an academic advisor at the college.

The goal of this requirement is to proactively assist students who are academically at-risk and provide supports as needed.

PROCEDURE

Students affected by the SAP Advising Requirement are assigned a hold, which informs the student they are to receive academic advising as a facet of the SAP Policy. This hold prevents student registration and is assigned once per award year.

The hold is viewable in Self-Service Banner and informs the student they are to receive academic advising as a facet of the SAP policy thresholds in place in order to register for any future coursework.

The RWRSADV (SAP Advisory Report) process is automatically run after the Financial Aid ISIR Dataload process. RWRSADV applies the SAP Advisory Holds for students whose GPA is below 1.7 and/or pace under 50% completion of attempted credits, preventing registration until students receive academic counseling from designated staff member. The hold does not prohibit awarding financial aid to any affected student. Designated staff at each college may expire the SAP Advising Hold upon successful completion of an advising event.

Note: There is a difference between SAP status and SAP Advisory Hold status. Students may have SAP Advisory Holds but have a satisfactory SAP status.

SECTION 13: RETURN OF TITLE IV FUNDS

The Financial Aid Office is required by federal statute to recalculate federal financial aid eligibility for Title IV grant or loan recipients who withdraw, drop out, are dismissed, or take a leave of absence prior to completing 60% of a payment period or period of enrollment. This requirement includes “unofficial withdrawals,” which are defined as students who stop attending their classes but do not follow college policy and officially withdraw from class(es). The law requires that the student’s federal aid eligibility be recalculated in these situations and any federal Title IV aid not earned by the student be returned to ED.

Effective July 1, 2021, there is a caveat to the 60% point for some module R2T4s who have completed module courses which ended earlier in the term.

13.1 PROCESS OVERVIEW AND APPLICABILITY

POLICY

Each college is required to return a portion of the Title IV aid funds for students who did not attend/complete more than 60% of the payment period or period of enrollment. For students who completed 60% or less of the payment period, a pro-rata proportion of the federal aid must be returned to the federal aid programs. Recalculation is based on the percentage of earned aid using the following federal return of Title IV funds formula:

$$\% \text{ Payment Period Completed} = \frac{\# \text{ of Days Completed up to the Withdrawal Date}}{\text{Total Days in the Payment Period}}$$

The percentage of the term completed is also the percentage of federal aid earned by the student. If a student earned less aid than was disbursed, the college is required to return a portion of the funds, which can result in the student owing a balance to the college. If a student was eligible for and earned more aid than was disbursed to him/her, the college will make a post-withdrawal disbursement to the student’s account within 180 days of the student’s withdrawal.

R2T4 calculations are completed within 30 days after the date of the determination of the date of the student’s withdrawal, and funds are returned within 45 days after the date of determination.

OFFICIAL WITHDRAWALS

Official withdrawals are students who drop and/or withdraw from all classes during the term via course withdrawal forms or by withdrawing from the college. Of note, ED does not distinguish between a dropped course and a withdrawn course after the student has begun attendance in at least one course in the term. However, it is possible to have a student with an official withdrawal who has a passing grade from a module class that ended earlier in the term while still enrolled in the other classes which they eventually withdrew from.

UNOFFICIAL WITHDRAWALS

Unofficial withdrawals are students who typically have earned no passing grades for the payment period due to stopping attendance earlier in the term but did not officially withdraw from all their courses. These students will have all F grades or some combination of all W and F grades and/or dropped courses after the student had begun attendance in at least one course in the term. It is possible to have a student with an unofficial withdrawal who has a passing grade from a module class that ended earlier in the term while still enrolled in the other classes which they eventually stopped attending and/or withdrew from. Colleges are required both to be able to establish

that the student began attendance in each course and to do an R2T4 calculation on “unofficial withdrawals.” Faculty are required to report a “last date of attendance/participation” with every F-grade assigned. This allows the financial aid administrator to determine if the student is a completer or an unofficial withdrawal in that class. Per BOR policy, only students who have attended/participated for at least 60% point of the course can be considered for an Incomplete notation. Therefore, students with no passing grades which include an Incomplete are not reviewed for a potential return of funds.

TITLE IV GRANT OR LOAN RECIPIENT

A Title IV grant disbursement at all colleges includes disbursements to the student’s account of Pell Grant and Supplemental Educational Opportunity Grant (SEOG). A Title IV loan disbursement includes disbursements to the student’s account of any Direct Loan payment, including subsidized and unsubsidized loans, and PLUS loans borrowed by the student’s parent.

PERIOD OF ENROLLMENT OR PAYMENT PERIOD

All programs utilize a traditional semester calendar. Their periods of enrollment are defined as the fall, spring, and summer semesters. The winter term is included as a module of the larger spring semester.

TITLE IV DISBURSEMENT

Title IV aid is considered disbursed when it is applied to the student’s account.

INSTITUTIONAL CHARGES

These charges are used to determine the portion of unearned Title IV aid that the school is responsible for returning. Institutional charges include tuition and fees, as well as book charges if they are purchased via the voucher system at the college’s bookstore.

AID APPLICANTS NOT REQUIRING AN R2T4 CALCULATION

- Title IV grant and loan eligible students who withdraw before establishing eligibility, and are not eligible for a post-withdrawal disbursement.
- Title IV grant and loan recipients who withdrew from some coursework but remain concurrently enrolled in other courses.
- Federal Work-Study recipients who are not Title IV grant and loan recipients.
- Aid recipients who did not apply for or are not eligible for Title IV grant or loan aid.

PROCEDURE

The R2T4 process is initiated for official withdrawals by the student withdrawing and/or dropping all of their coursework. R2T4 calculations are performed on a payment period basis and are executed by a procedure within the Banner system. R2T4 calculations are performed weekly by the college Financial Aid Director or designee. This ensures that all calculations are completed within the 30-day timeframe and funds are returned by the Bursar Office within 45 days.

The weekly withdrawal procedure is predicated upon the Registrar running the student withdrawal process on a weekly basis.

At the end of each payment period/term after grades are posted, the R2T4 procedure is run to identify Unofficial Withdrawals and those calculations are completed within 30 days of the Date of Determination.

The following describes the R2T4 procedural steps in Banner:

- Step 1: Determines the student's withdrawal date
- Step 2: Determines the percentage of earned aid
- Step 3: Determines the amount of earned aid
- Step 4: Determines the amount of unearned aid
- Step 5: Determines the school and student shares of unearned aid
- Step 6: Allocates unearned aid
- Step 7: Determines and makes post-withdrawal disbursements (if any)

Once the calculation is completed, the student is notified via paper communication by the financial aid office. If a balance is due, the Finance Office will follow up with a bill.

Determination of the student's withdrawal date, including identification of and treatment of students receiving F-grades who did not complete their coursework, is described in Section 13.2.

13.2 WITHDRAWAL DATE

POLICY

All institutions are defined as not required to take attendance for Title IV purposes by any outside entity, or within any governing documents. The R2T4 process and the definitions for Withdrawal Date and the Date of Determination are made on the basis of a non-attendance taking institution.

For determining the last date of attendance for unofficial withdrawals, the student's most recently documented date of academic engagement in a class is submitted to the Registrar by the faculty member via the Banner system.

WITHDRAWAL DATE/LAST DATE OF ATTENDANCE (LDA)

A student's Withdrawal Date for the period of enrollment is used for calculating the numerator in the R2T4 calculation. The latest LDA of the LDAs for each course the student is registered in for the term is the Withdrawal Date used in the R2T4 calculation.

- For courses that a student has officially withdrawn from and for dropped courses, the Withdrawal Date is the date that the student officially withdrew from/dropped the course either at the Registrar's Office in person, or online.
- For courses where the student may be an Unofficial Withdrawal (F-grade), the student's LDA for the course is reported by the faculty when the F-grade is assigned. For students with all Fs and more than one course, the latest of the LDAs reported from each of the registered classes in the term is the LDA used for the R2T4 calculation.
 - For Unofficial Withdrawals who also have some courses with W-grades, the LDA/Withdrawal Date of the W-grade is also evaluated and compared with the reported LDAs of the courses with F-grades, and the latest LDA of all the courses is the Withdrawal Date used in the R2T4 calculation.

DATE OF DETERMINATION (DOD)/EFFECTIVE DATE

This is the "effective date" of the student's withdrawn status from courses from the term which has necessitated the R2T4 calculation. The latest effective date of the course withdrawal for each of the student's registered

courses for the term is the “Date of Determination” for the R2T4 calculation. The 30-day count for completing the R2T4 calculation begins with the Date of Determination.

- For courses that a student has officially withdrawn from, and for dropped courses, the Date of Determination is the date that the student officially withdrew from/dropped the course either at the Registrar’s Office in person, or online. The effective date of the withdrawal for each course is reviewed and the earliest of those dates is the Date of Determination for the R2T4 calculation. The Withdrawal Date and the Date of Determination are the same date for Official Withdrawals.
- For courses where the student is an unofficial withdrawal, the date that the Registrar runs the procedure to post grades at the end of the term is the Date of Determination for the R2T4 calculation.

MODULE

A module is any class that doesn't span the entire length of the payment period. Therefore, any class that does not either begin within 1 week of the start of the published term start date, and/or end within 1 week of the end of the published term end date is defined as a "module" for R2T4 purposes. CSCC does offer modular coursework to students. Specifically, all courses in the Winter Session are considered modules of the larger Spring semester, and traditionally summer courses do not span the entire length of the summer payment period. Modular coursework is also comprised within the traditional Fall and Spring semesters. Each college may provide varying modular parts of term.

MODULAR R2T4

If a student registers in even one module class, then the module approach to R2T4 calculations must be used. This involves evaluating the days attended based on the earliest start date for the enrolled classes and the latest end date, rather than on the term start and end dates. The following are module situations which may require an R2T4 calculation:

- Students who have dropped and/or withdrawn officially or unofficially from all courses and none of the courses span the full length of the term.
- Per final regulations published 9/2/2020, students who withdraw from all currently enrolled classes who completed and may even have a passing grade from a module class or classes that ended earlier in the term, and that class or classes did not comprise at least 49% of the payment period (a student who complete a Winter class and withdraws from all Spring term classes since Winter term is a part of Spring, or a student who withdraws from a late starting summer course after completing an earlier starting summer class).
- Students who withdraw from all currently enrolled classes who may be enrolled in a class that has not yet started (a student who withdraws from all fall classes, or a Winter student who withdraws and is registered for a Spring course that has not begun yet, or a student who withdraws from or drops an early starting Summer term class who remains registered for a late starting summer class that hasn’t begun yet). An R2T4 calculation is required and completed unless the student provides an “affirmative confirmation” in writing after withdrawing that the student will attend the course which has not begun yet.

PROCEDURE

The Registrar's Office at each college updates Banner with the withdrawal date based on the student’s date of official withdrawal on their withdrawal form for official withdrawals. For electronic withdrawal forms, this is an automatic update. For manually submitted withdrawal forms, the Registrar’s Office manually updates Banner as appropriate.

For unofficial withdrawals where there is an F-grade assigned at the end of the term, the faculty report the student's last date of engagement in the course based on their records of assignments submitted, tests and quizzes taken, and/or other documented class participation.

There is no official process for a student to rescind withdrawal from a course.

13.3 R2T4 FORMULA CALCULATION

POLICY

At the time of award year setup, standard semester start and end dates are reviewed in accordance with the predetermined common calendar for the community colleges (<https://www.ct.edu/academics/calendar>). The dates are also validated by the Banner Student Team to ensure adequate internal controls related to adequately processing origination/disbursement records and R2T4 records. Dates are again reviewed thirty days prior to the start of each Fall and Spring semester by the AVP for Financial Aid Services & Title IV Compliance and the AVP for Enrollment & Retention Services to ensure the correct start and end dates, as well as the same calendar break dates are housed in the student information system.

Office policies regarding modules and modular R2T4s are describes in Section 13.2.

Effective July 1, 2021, there is a caveat to the 60% point for some module R2T4s who have completed module courses which ended earlier in the term. For module R2T4s who have completed one or more modules in the term prior to withdrawal, if those modules comprise more than 49% of the denominator, no R2T4 calculation is required.

DAYS IN THE NUMERATOR

Used for calculating the percentage attended of the term in the R2T4 calculation.

- Numerator in a Standard R2T4: Count days from the Term Start Date to the LDA (inclusive of the Term Start Date and LDA), less any scheduled breaks of 5 consecutive days or more.
- Numerator in a Module R2T4: Count days from the Earliest Start Date of the registered courses that must be included for the R2T4 to the LDA, LESS any scheduled breaks of 5 consecutive days or more including breaks between module classes of 5 days or more.

DAYS IN THE DENOMINATOR

Used for calculating the percentage attended of the term in the R2T4 calculation.

- Denominator in a Standard R2T4: Count days from Term Start for R2T4 to Term End Date for R2T4 (inclusive of the Term Start Date and Term End Date, and both are the published term dates), less any scheduled breaks of 5 consecutive days or more.
- Denominator in a Module R2T4: For the classes that must be included, count days from earliest course Start Date to latest course End Date (inclusive of the start and end date), less any scheduled breaks of 5 consecutive days or more including breaks between module classes of 5 days or more.

REQUIRED TIMING

All R2T4 calculations are required by federal law to be completed within 30 calendar days from the Date of Determination. CSCC uses the Banner system to perform the calculation. Any aid funds that are required to be returned to the federal programs at the Department of Education via the G5 system must be returned within 45 days of the Date of Determination.

The Registrar processes all student withdrawals on a weekly basis. The Financial Aid Office also processes R2T4 calculations for withdrawn students on a weekly basis.

CRITICAL STUDENT DATA NEEDED FOR THE R2T4 CALCULATION

- Date of Determination/Effective Date for each course
- Last Date of Attendance/Withdrawal Date for each course
- Determination of the number of days the student attended in the term (numerator)
- Determination of the number of days the student was projected to attend in the term (denominator)
- Student's Institutional Charges required for the R2T4 for calculation
- Scheduled breaks of five days or more are not counted as part of the days in the term and are set up in Banner as such.

VERIFICATION

Withdrawn students who have not completed verification at the time of withdrawal may still complete verification under federal law and receive their aid. CSCC policy is not to award or disburse Title IV funds until any required verification of FAFSA information has been completed (i.e., no interim disbursements). However, if a student is selected for verification after disbursement, the disbursement is reversed and remains pending until verification is completed. The colleges do not make interim disbursements of Title IV aid.

All R2T4 situations where verification is incomplete at a CSCC college would involve a post-withdrawal disbursement. Within 30 days of the student's withdrawal date, the student is notified in writing of both the response required within 15 days to determine if the student is interested in receiving a post-withdrawal disbursement and the 30-day deadline from term end to complete verification in order to be eligible for a possible post-withdrawal disbursement.

The R2T4 calculation is completed within the 30-day regulatory timeline based on Title IV disbursements not subject to verification. The calculation should include aid awards based on the EFC which are subject to verification requirements as "Aid That Could Have Been Disbursed". If verification is completed by the student within the required deadlines, the calculation will be redone by the financial aid director or other designated staff member. Refer to Section 13.4 for further policy and procedure for Post-Withdrawal Disbursements. Verification does not include resolution of database match conflicts or comment codes.

PROCEDURE

R2T4: ORDER OF OPERATIONS

1. Determine if the student may be subject to an R2T4.
2. Determine if the student is eligible for a post-withdrawal disbursement and ensure all aid awards and disbursements are accurate before performing the calculation.
3. Perform R2T4 calculation with 30 days of the Date of Determination.
 - Based on full tuition charges PRIOR to application of any tuition adjustments the student might be eligible for due to withdrawing.
 - Use either the Modular or Standard R2T4 calculation, as appropriate.
4. Return the amount of federal funds to the federal programs (or student) that is required within 45 days of the Date of Determination.
5. Refund resulting credit balance on account within 14 calendar days (first to any grant overpayments to the federal programs and then to the student).

BANNER R2T4 PROCESS

1. Weekly Identification of Students who May Require an R2T4 Calculation
 - a. The Registrar's Office runs the student withdrawal process in Banner (SFRWDRL), which populates any pertinent R2T4 information on the SFAWDRL form. This is done on a weekly basis beginning the week prior to term start and continuing through term end and until all R2T4 calculations required to be processed are complete. The Withdraw Pending Status Change Report (SFRNOWD) may be additionally useful in identifying unofficial withdrawals.
2. Manual Validation Processes
 - a. Prior to performing any calculations – the FAA checks to be sure the students began all courses for which aid was awarded and recalculates aid awards as appropriate.
 - b. The FAA runs the RPRTIVC process in Banner which provides an output report of all students requiring a return of funds. The FAA manually verifies the TIV enrollment status, EFC, and disbursements to ensure they match.
 - c. Students who are FWS recipients should have their supervisors contacted to ensure that work is immediately discontinued.
3. Calculation of the R2T4
 - a. The FAA runs the R2T4 process in Banner, RPATIVC, first in simulation mode in order to validate that the FA enrollment status matches the enrollment status, EFC, and disbursement amounts one more time.
 - b. The RPATIVC is run by individual student and saved.
4. Manual Adjustments
 - a. The FAA manually adjusts the Pell awards and Loan awards in RPAAWRD for any required return of funds.
 - b. The FAA runs the ROAIMMP process for the correct amount paid and compares to the amount in RPAAWRD to ensure it's the same.
 - c. A third check is performed in the TSAAREV Banner screen to ensure all return of funds numbers match.
5. Additional Steps to Complete the Process
 - a. If a student is due a credit balance refund, the FAA contacts the Finance Office, or appropriate office, to hold the refund check until the R2T4 process is complete.
 - b. Once the calculation is complete and disbursed, the FAA emails the Bursar's Office to send an invoice and the Financial Aid Office sends an email or a letter to the student.
 - c. If the R2T4 involves a post-withdrawal disbursement, it is noted in RHACOMM. The Financial Aid Director or designated staff member reviews and monitors these comments and dates to ensure that the calculations are completed, and the post-withdrawal disbursement is made once verification is complete.
 - d. At the end of the semester, a designated staff member will review the disbursement amounts within Banner to ensure that the amounts authorized match the R2T4 amounts earned.

DROPS/WITHDRAWALS FOR PRIOR TO CENSUS

If a student drops/withdraws prior to census, the colleges work with the Registrar's Office to determine if there is evidence that the student participated in the class, even if just one day. The BOR's Policy on Grading, Notations, and Academic Engagement is the basis for determining engagement prior to census. A determination is made for those students as to whether they demonstrated active participation in accordance with ED's recommended definition and the BOR policy. A post-withdrawal disbursement calculation is performed for students who have proof of academic engagement in any coursework. For students without proof of academic engagement, the enrollment status is changed to reflect a "Never Participated" status for that course(s). The aid award is modified, and a post-withdrawal disbursement calculation performed if appropriate. If there are no courses with academic engagement, all aid is reversed, and the student is not subject to an R2T4 calculation since no aid was earned.

WINTER MODULE WITHDRAWALS

When a student is registered for courses in both the winter and spring terms, but withdraws during the winter term, an R2T4 calculation is completed unless the student provides “affirmative confirmation” in writing of his/her intent to continue with the spring term course.

Due to limitations within the Banner product, when students are enrolled within a winter/spring payment period and withdraw during the winter course or in between the winter and spring courses without continuing to the Spring, the FAA must perform the R2T4 calculation manually. The earliest start date, latest end date and other required data for the R2T4 calculation is gathered from the Banner RPATIVC report run in simulation mode. The Financial Aid Director or designated staff member then completes a manual calculation on paper using ED’s R2T4 Calculation Worksheets. The return results are input to Banner and the worksheet is saved in the student's file. Students withdrawing in the winter term are noted on the RPRTIVR – Return of Title IV Funds Recipient Withdrawn Status report.

SUMMER PAYMENT PERIOD WITHDRAWALS

The summer session is comprised of modules which do not span the entire length of the summer payment period. If the student has withdrawn from all courses in a term prior to the commencement of the later course in the term, all the days for which the student was originally registered in the payment period (all scheduled Parts of Term for all summer modules) will be included in the R2T4 calculation.

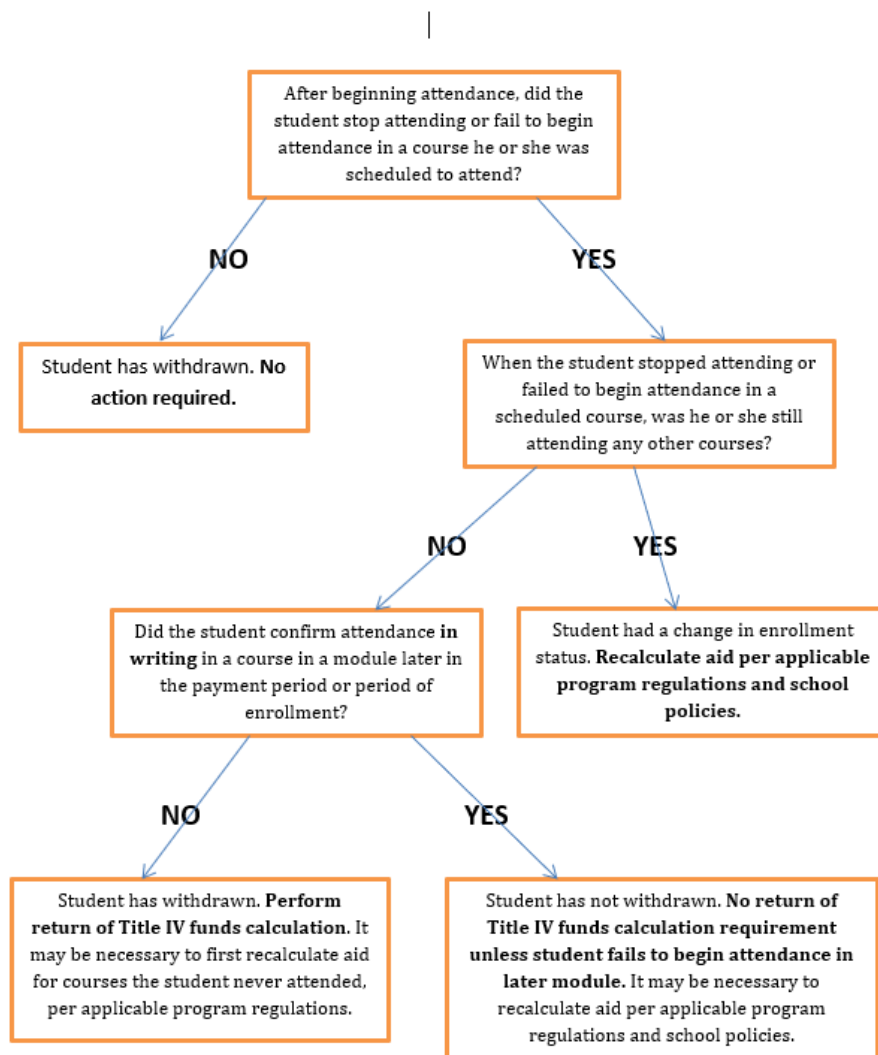
Students who withdraw from a module in summer and the next course the student is registered in is not scheduled to start within 30 days is required to have an R2T4 calculation performed unless the student provides “Affirmative Confirmation” in writing of their intent to attend the course. The Financial Aid Director or designated staff member will reach out to affected students for a Statement of Affirmative Confirmation via email or phone. The student must provide the confirmation in writing.

R2T4 FLOWCHART FOR MODULES

If the student completed a module course prior to the Withdrawal Date when all other enrolled courses are either withdrawn from and/or dropped, the student is still subject to an R2T4.

New regulations which go into effect on 7/1/21 which do not impact the following decision tree. They simply change the cutoff point for a return in the specific module situation when a student withdraws and/or drops all currently enrolled courses after having completed a prior module course, prior to the Withdrawal Date. This changes the threshold for returning funds from 60.01% attendance/participation in the payment period to 50%.

Determining Whether a Student Has Withdrawn from a Program Offered in Modules



13.4 POST-WITHDRAWAL DISBURSEMENTS

POLICY

Post-Withdrawal Disbursements (PWD) are calculated via the R2T4 formula and represent a disbursement due to the student based on the aid earned for the payment period. ED does not distinguish between a "withdrawal" from a course and a "drop" from a course once the student has begun attendance in at least one course in the payment period. ED has been specific in guidance that if the student's LDA is prior to the institution's Pell Recalculation Date (and therefore disbursement of Pell), the student is still due a post-withdrawal disbursement. In the event a student dropped or withdrew from some, but not all courses prior to census, their Pell Recalculation at Census would modify the financial aid award accordingly, and the student would not be owed a PWD.

TWO BASIC PWD SCENARIOS

1. Student who drops classes and has aid that has not disbursed:
 - Whether it is pre-census or post-census, an evaluation of whether a PWD must be done is required.
 - Since in a traditional semester environment, by regulation the college is allowed to use the student-initiated official withdrawal date as the date of determination and the withdrawal, the same is done for the drop date.
 - If all classes are dropped classes, the college is required to document that the student began attendance in at least one course. If not, the student did not establish eligibility for aid for the payment period and no R2T4 is required. If yes, the college proceeds with evaluating the student for a post-withdrawal disbursement.
2. Student who withdraws from classes and has aid that has not disbursed:
 - Whether the withdrawal is pre-census or post-census, the withdrawal date is the DOD and the LDA, and the student must be reviewed for a PWD.

The R2T4 procedures include an evaluation of official and unofficial withdrawals with undisbursed aid for a post-withdrawal disbursement. A PWD may or may not be eligible to be disbursed but must be included in the R2T4 calculation under TIV regulation. Banner R2T4 procedures and school policies ensure the following with all R2T4 calculations involving potential post-withdrawal disbursements.

The following are requirements for aid that could have been disbursed when assessing a student for a post-withdrawal disbursement:

BASIC REQUIREMENTS TO BE INCLUDED AS A POTENTIAL PWD IN THE R2T4 CALCULATION (EVEN IF IT IS NOT EVENTUALLY ELIGIBLE FOR DISBURSEMENT)

- The student must have an ISIR record with an official EFC.
- Undisbursed SEOG must have been awarded by the student's withdrawal date.
- Undisbursed direct loans must have been originated/awarded by the student's withdrawal date.
- Undisbursed PLUS Loan credit check of satisfactory received by the student's withdrawal date.
- Loan applicants must have been enrolled at least halftime on the withdrawal date in order to establish eligibility for the loan, and for the loan disbursement to be included in the R2T4 calculation as aid that could have been disbursed.

Additional Criteria for "Aid That Could Have Been Disbursed" to also be offered to the student (at least one of the following must be met)

- The colleges will disburse Title IV grant PWDs (Pell & SEOG) within 45 days of the DOD without confirmation from the student, as required by regulation.
- PWDs for eligible direct loan payments should be made within 7 days of receipt of the student's confirmation that the PWD is wanted, and within 180 days of the WD at the latest. In order for the loan to be eligible to be disbursed to the student, it must also meet the following criteria:
 - A loan MPN was signed prior to the R2T4 calculation.
 - The loan disbursement is the 1st disbursement of the loan for the loan period.
 - The college will have offered the loan PWD in writing to the student prior to disbursing it no later than 30 days after the DOD, and the provided the student 14 calendar days to respond. And the student responded affirmatively.

All PWD disbursements must meet regular late disbursement conditions and any other eligibility requirements such as maximum annual and lifetime limits and SULA.

“AID THAT COULD HAVE BEEN DISBURSED” WHICH CANNOT BE DISBURSED TO THE STUDENT

- A DL award originated but the MPN is not signed.
- A first loan disbursement for a first-time first year borrower who withdraws prior to the 30th day of the payment period.
- A second disbursement of Direct Loan since the student did not successfully complete the payment period.
- A first direct loan disbursement in a modular situation IF the student had not begun attendance in enough courses prior to withdrawing to establish halftime enrollment status – ie the course(s) bringing the student to halftime status had not started yet.

AID THAT COULD HAVE BEEN DISBURSED AND WAS INCLUDED IN THE CALCULATION AND POTENTIALLY ELIGIBLE TO BE DISBURSED TO THE STUDENT BUT WILL NOT BE DISBURSED

- Direct Loan PWD payments eligible for disbursement but the student did not respond affirmatively that the student wants to receive the loan disbursement.
- Undisbursed grant and loan aid subject to verification if the student failed to complete verification. Only Title IV aid not subject to the verification requirements will remain disbursed, and the undisbursed grant and loan aid remains in the calculation as “Aid That Could Have Been Disbursed.”
- Withdrawals have until the college’s verification deadline to complete verification. In a situation where verification is not complete at the time the R2T4 calculation is completed, the calculation is required to be completed based on Title IV aid not subject to verification.
- The colleges maintain documentation in the student’s file of the notification process for Loan PWDs and the final determination made concerning disbursement.

PROCEDURE

The priorities for disbursement of PWDs are to disburse grants first and then loans. Disbursements are applied to the student’s account, and any credit balance would be issued to the student within the 14-day regulatory deadline.

Banner setup evaluates students for eligibility for a post-withdrawal disbursement based on the regulatory requirements listed above. If eligible, the R2T4 process will calculate the amount of the PWD payment. In addition to these procedures, additional manual steps required for processing R2T4 calculations requiring evaluation of a possible PWD include:

- Review of those students with undisbursed aid in the Banner RPATIVC report run in simulation mode, and review of that award to ensure the student is eligible.
 - Once the calculations are completed, Identification of those requiring a written offer of the PWD within 30 days of the Date of Determination and generation of that letter once the R2T4 calculation is completed. The student/parent is provided 15 days to respond in order to receive payment.
- Eligibility for the PWD payment pending approval by the student is noted in Banner
- When confirmation is received from the student that the disbursement is wanted Banner is updated, the disbursement is approved, and the documentation is retained in the document imaging system.
 - For loan PWDs not eligible for disbursement, Banner is updated to document that.

13.5 RETURNING UNEARNED FUNDS

POLICY

The R2T4 process encompasses a determination of the aid amount to be returned by the college, and a student's award is adjusted as accordingly. Refer to Section 11 on Disbursements for information on the disbursement of aid.

Funds not earned are returned to the appropriate federal program in the following order:

- Unsubsidized Direct Stafford loans
- Subsidized Direct Stafford loans
- Federal Parent (PLUS) loans
- Federal Pell Grants
- Federal Supplemental Opportunity grants

Aid funds required to be returned to the federal programs as a result of an R2T4 must be returned via the G5 system within 45 days of the Date of Determination. The Bursar's Office manages this function.

PROCEDURE

Unearned funds are returned via Banner and the G5 process by the Bursar Office. This is an automated process that is managed by the Bursar's Office. The Bursar's Office closely monitors the G5 fund balances. Any unearned funds are returned within the 3-day required timeframe if the college has a zero balance in G5.

13.5.1 OVERPAYMENT RESOLUTION

POLICY

Grant overpayments owed by a student due to an R2T4 calculation are returned to ED on behalf of the student. The R2T4 calculation will designate the grant payment due by the student, and the college will return those funds to the federal aid program for the student and charge the student directly. This policy prevents high need students from losing Title IV eligibility in the future due to an overpayment situation.

PROCEDURE

Banner is designed to make overpayment adjustments automatically to the student's aid award, and to the aid disbursement upon completion of the R2T4 calculation. The student's bill will reflect the full amount owed as a result of the R2T4. Both the amount required to be returned by the college and the overpayment amount that was required to be returned by the student are calculated.

Should an overpayment situation arise, colleges must notify a student of any obligation to return funds within 30 days of the Date of Determination. Follow-up reporting to NSLDS and ED's Debt Resolution Services is required when students do not return the funds within 45 days of the Date of Determination.

Students are ineligible to receive Title IV funding if they are in a Grant Overpayment status.

SECTION 14: INSTITUTIONAL REFUNDS

POLICY

The BOR develops fiscal and administrative policies related to all institutions under CSCU. The Central Office Finance and A/R Departments implement fiscal and administrative policies, which includes the institutional refund policy. The college Bursar Offices manage the policy at the college level. The financial aid offices do not have a responsibility to administer any policy related to refunds.

Residency determinations are made pursuant to [Connecticut General Statute 10a-29](#). Based on this determination, students are assessed tuition and fee rates in accordance with their residency status. The following categories exist:

1. Connecticut Residents
2. Non-Residents
3. New England Board of Higher Education (NEBHE)
 - o Equivalent to out of state but at a discounted rate.

The BOR has implemented a policy on Refund and Course Withdrawals for the Connecticut State Community Colleges: <https://www.ct.edu/files/policies/3.7-refund-policy.pdf>

The CSCU Provost and Senior Vice President for Academic and Student Affairs, or designee, shall be the presiding authority over the application of this policy to all community colleges. It shall be included in all college catalogs, student handbooks, and college websites, and shall be made available upon request.

In September 2017, the twelve community colleges adjusted their census date from the second week of the semester to the third to better align with the practices of the four state universities. However, the standing refund policy was never adjusted to align with the new census date.

In April 2020, the Board of Regents approved the Grading, Notations, and Academic Engagement Policy (20.052) to more accurately depict official student enrollment at the time of census. It became evident that the current community college policies on course withdrawals and refunds should be reviewed to ensure consistency in approaching both the active engagement of a student in their registered coursework, as well as the policies surrounding a student's ability to add/drop courses and/or withdraw from coursework.

Combined, these policies will confirm a student's active engagement in their registered coursework prior to each 15-week semester census and provides a uniform framework for refunding during the add/drop period through the end of the semester.

To provide for the equal treatment of all students, regardless of their method of payment for applicable course-related charges, it was recommended that the Board of Regents revise its refund policy for all community college students. The new policy seeks to correct the punitive nature of the current refund policy which impacted students both financially and in terms of their persistence rates and student success.

The policy is designed to remove the existing financial disincentives for early registration which charge a student for adjusting a class schedule. Further, CSCC students who have the most need will be allowed to adjust courses at the start of term without accruing a financial penalty they cannot afford. This modification also provides the opportunity for students to test the various instructional modalities without fear of penalty during the first seven calendar days of full-term semester courses.

The policy incorporates a new fee, the Late Drop Fee, to be assigned to students who drop any coursework under the definitions below. Students assigned a registration status of Not Participating (NP) shall have the Late Drop Fee assessed to each applicable course. This fee will be assessed at \$50 per course, with no per term cap.

Lastly, the new policy refined course withdrawal dates to better align with the majority of the four Connecticut State Universities.

A chart detailing the new tuition and fee structure is listed in 14.1.

REFUNDS OF TITLE IV AND OTHER FINANCIAL ASSISTANCE

This policy excludes the effect of the Return of Title IV Aid calculation for student aid recipients. The Financial Aid Office is required by federal statute to recalculate federal financial aid eligibility for Title IV grant or loan recipients who withdraw, drop out, are dismissed, or take a leave of absence prior to completing 60% of a payment period or period of enrollment unless otherwise noted by the US Department of Education. This includes “unofficial withdrawals,” which are defined as students who stop attending their classes but do not follow college policy and officially withdraw from class(es). Federal law requires that the student’s federal aid eligibility be recalculated in these situations and Title IV aid not earned by the student be returned to the US Department of Education.

It is recommended that students receiving financial assistance should consult with the Financial Aid Office prior to withdrawal to determine the financial impact that the Return of Title IV funds calculation will have. Funds not earned by the student are required to be returned to the appropriate federal program in the following order:

1. Unsubsidized Federal Direct Stafford Loans
2. Subsidized Federal Direct Stafford Loans
3. Federal Direct PLUS received on behalf of the student
4. Federal Pell Grants
5. Federal Supplemental Educational Opportunity Grants
6. Other grant or loan assistance authorized by Title IV of the Higher Education Act

Although not required under federal regulation at the time of this policy, after federal return obligations are satisfied, any remaining funding shall then be returned to the following programs at the discretion of the policy associated with that funding source:

1. Other State, Institutional, or Private financial assistance
2. Student

REFUNDS TO VETERANS

Students entering the armed services; being relocated by the military; or deployed, before earning degree credit will have 100% of term charges cancelled upon submitting notice in writing and a certified copy of enlistment papers.

PROCEDURE

REFUNDS

For Traditional Fall/Spring Semester Courses:

- Students who drop courses prior to the term or up until the 7th day of the term having elapsed (i.e. 10% of the term) will be entitled to a 100% refund of tuition and fees.
- Students who drop subsequently to the 7th day of the term but prior to the 21st day of the term having elapsed will be entitled to a 100% refund of tuition and fees less a “late drop” fee assessed at \$50 per dropped course.

- Students who withdraw subsequently to the 21st day of the term having elapsed will be charged 100% of all tuition and fees.

For Courses Offered in Abbreviated Terms (e.g., summer, winter, late start courses, etc.):

- Students who drop courses prior to the abbreviated term and up until 10% of the abbreviated term having elapsed will be entitled to a 100% refund of tuition and fees.
- Students who drop subsequently to 10% of the abbreviated term having elapsed but prior to 20% of the abbreviated term having elapsed will be entitled to a 100% refund of tuition and fees less a “late drop” fee assessed at \$50 per dropped course.
- Students who withdraw subsequently to 20% of the abbreviated term having elapsed will be charged 100% of all tuition and fees. Dates representing the 10% - 20% points of the respective abbreviated terms will vary according to each session/part of term in which the student is registered. Please see the Registrar or Bursar’s office for the exact dates on which the “late drop” fee will be assessed.

WITHDRAWALS

For Traditional Fall/Spring Semester Courses:

No course withdrawals will be accepted once 80% of the semester has passed. For a typical 15-week term, 80% of the term is considered the last day of the twelfth week of the term. A student may appeal the course withdrawal deadline due to mitigating circumstances.

For Courses Offered in Abbreviated Terms (e.g., summer, winter, late start courses, etc.):

No course withdrawals will be accepted once 80% of the abbreviated term has passed. For abbreviated terms, 80% is considered the last day of the business week of that period. A student may appeal the course withdrawal deadline due to mitigating circumstances.

Note: financial aid students who withdraw from summer courses subsequently to 20% of the abbreviated term having elapsed but prior to the summer financial aid census date may be charged 100% of tuition and fees for those courses with no corresponding/offsetting summer financial aid disbursement.

ADDING & DROPPING COURSES

FULL-TERM COURSES (15 WEEKS)

Students may drop courses through the end of business day of the 21st calendar day of the term. Courses dropped during this period would not appear on a transcript. Courses can only be added up to calendar day seven of a full, 15-week term.

ABBREVIATED TERM COURSES

Students may drop courses through the first 20% of an abbreviated term length. Courses dropped during this period would not appear on a transcript. Courses can only be added up to the first 10% of the abbreviated term length.

Note: specific dates/deadlines related to all aspects of the “add/drop” period are identified in the academic calendar.

NON-PARTICIPATION (ACADEMIC ENGAGEMENT)

The community colleges are required to verify the academic engagement of each student in each registered course by demonstrating “academic attendance” or an “academically-related activity” for Title IV purposes. This must be

completed prior to the predetermined census date of each traditional semester, as well as during periods of enrollment shorter than the traditional 15-week semester (i.e., summer terms and other abbreviated terms). Students who are determined to have not academically engaged in a period of enrollment leading up to census shall be assigned a registration status of “Never Participated (NP)” for each affected course. Students with the NP designation will be dropped from the course(s) they have not participated in and will be assessed a Late Drop Fee of \$50 for each affected course as outlined in policy.

14.1 INSTITUTIONAL REFUND COMPONENTS

POLICY

In addition to tuition charges, the fee components of the institutional refund calculation are noted below. Tuition and fee rates are located at <https://www.ct.edu/admission/tuition>.

Additional Fees	Time Due	CSCC Refund
Late Drop Fee	Due upon time of assessment. The fee will be assessed at \$50 per course, without a cap provided.	Non-refundable.
Supplemental Course Levels 1 & 2	Due date established by college	Same as tuition
Clinical Fees/Allied Health Fees	Due date established by college	Same as tuition
Nursing Media Fee	Due date established by college	Same as tuition
Nursing Program Learning Support & Assessment	Due date established by college	Same as tuition
Manufacturing Fee	Due date established by college	Same as tuition
College Services and Student Activity Fees	Due date established by college	Same as tuition
Transportation Fee	Due date established by college	Same as tuition
Materials Fee	Due date established by college	Same as tuition
Replacement ID Fee	Due date established by college	Non-refundable
Academic Evaluation Fee	Due date established by college	Non-refundable
Portfolio Fee	Due date established by college	Non-refundable

PROCEDURE

The institutional refund procedures are fully automated at each college through the Banner system via system set up at the Central Finance Office.

When a tuition refund is generated, a notification is generated and sent to the student and the information is also available in Banner Self-Service.

14.2 INSTITUTIONAL REFUND AND REPAYMENT APPEALS

POLICY

Appeals must fall under one of the following categories to be considered by the Refund Appeals Committee:

- Documented medical emergency
- Documented personal emergency
- Documented military relocation or deployment
- Incorrect advisement for the program of study

PROCEDURE

All appeals must include the Refund Appeal Form that is available online as well as each college Registrar's Office and Bursar/Business/Finance Office. The form includes instructions for submitting an appeal, and any relevant information regarding notification to the student of the outcome. Each appeal must contain supporting documentation to substantiate the appeal. This may include:

- A medical professional's note
- Hospital discharge documentation
- Obituary or death certificate
- Military deployment
- Other documentation on a case-by-case basis

TIMEFRAME TO APPEAL

Appeals are expected to be submitted during the term for which the appeal is being made.

APPEALS COMMITTEE

To provide consistency in decision-making, a Refund Appeals Committee from Connecticut State Community College (a subdivision of Connecticut State Colleges & Universities System Office) will make all appeal decisions in a timely manner upon review of the appeal form and any applicable documentation. The Committee should consist of the following membership:

1. Associate Vice President for Enrollment & Retention Services (or designee)
2. Associate Vice President for Financial Aid Services & Title IV Compliance (or designee)
3. Chief Financial Officer, CT State Community Colleges (or designee)

The Committee will respond to the student within 30 calendar days of the receipt of the request. A written response will notify the student of the outcome.

APPEAL STATUS

If the student's appeal is approved, the Registrar will update the student's registration status code in Banner and inform the Director of Finance/Bursar that a refund is due.

If the student's appeal is denied, the student is responsible for any monies owed to the college and that amount will remain on the student's account until paid.

All documentation for the appeal (including Appeal Form, substantiating documentation, and communication to student regarding the decision) shall remain with the student record in accordance with the Connecticut State Library's policies on Record Retention.

FINAL APPEALS

A final appeal of the decision of the Refund Appeals Committee may be made to the Vice President of Enrollment Management & Student Affairs (or designee). The decision of that official shall be final.

14.2.1 DOCUMENTATION

POLICY

Appeals must fall under one of the following categories to be considered by the Refund Appeals Committee:

- Documented medical emergency
- Documented personal emergency
- Documented military relocation or deployment
- Incorrect advisement for the program of study

PROCEDURE

All appeals must include the Refund Appeal Form that is available online as well as each college Registrar's Office and Bursar/Business/Finance Office. The form includes instructions for submitting an appeal, and any relevant information regarding notification to the student of the outcome.

SECTION 15: TITLE IV FRAUD

15.1 STUDENT FRAUD

POLICY

ED requires colleges to adopt reasonable safeguards and internal controls to protect against fraud and abuse. Colleges are also expected to refer any suspected cases of Title IV aid fraud, abuse, or misrepresentation to ED's Office of the Inspector General (OIG). The purpose of this policy is to address and prevent possible Title IV fraud by any student attending a CSCC institution.

If a college Financial Aid Office suspects that a student, employee, or other individual has misreported information and/or altered documentation to increase Federal Student Aid eligibility or to fraudulently obtain federal funds (i.e. identity theft), it must report those suspicions and provide any evidence to the OIG. Any individual suspecting fraud must report their concerns to the Director of Financial Aid, who in turn must report the matter to the Associate Vice President for Financial Aid Services & Title IV Compliance at the Central Office. The AVP will review the facts of the suspected fraud, including the review of any and all evidence, and refer the suspected offense to the Title IV Fraud Prevention Committee for review.

The final determination of the need to refer a case to the OIG is made, with the support of the Title IV Fraud Prevention Committee, by the Associate Vice President for Financial Aid Services & Title IV Compliance at the CSCC Financial Aid Office and the CSCC Vice President of Enrollment Management, with the recommendation of the CSCU Office of General Counsel.

If a determination is made that a referral is required, the Associate Vice President of Financial Aid & Title IV Compliance will be responsible for the official OIG referral, with the support of the college Director of Financial Aid in the gathering of any supporting documentation.

The following risk factors exist when making determinations of Title IV Fraud:

- An open admissions institution
- A low-cost institution so students can qualify for federal grant and loans, and receive significant portions of those funds as credit balance refunds
- Online courses are offered
- Fully online programs are offered (proctored or not)

Using the above risk factors as a baseline, the following types of Title IV Fraud are identified:

1. Not a “Legitimate” Student
 - Title IV loan applicants and Pell eligible applicants who are enrolled in college classes and applying for Title IV financial aid for the purposes of receiving financial aid refunds rather than for the goal of earning a degree or certificate.
 - One example of this are applicants who use false or fictitious names or aliases, addresses, or SSNs, including the deliberate use of multiple SSNs. Another example is what ED refers to as “Pell Runners,” which are applicants who jump from low cost college to college for the purpose of getting aid refunds but not getting an education.
2. Falsifying Aid Application Data
 - Title IV loan applicants and Pell eligible applicants who falsify data on their FAFSA or documents to support their federal financial aid application in order to receive more financial aid than the student would be eligible for, and therefore receive a larger credit balance refund. The student’s goal may still be to earn the college degree.

CT State maintains a proactive stance in the identification and resolution of possible fraudulent information. CT State also maintains a strict separation of duties as required by Federal law, and proactively investigates conflicting information. Furthermore, individuals employed within the Financial Aid Office receive training concerning the identification and resolution of cases involving possible fraudulent information.

INCEPTIA – THIRD PARTY SERVICER IDENTIFICATION OF SUSPECTED STUDENT TITLE IV FRAUD

CSCC contracts with Inceptia to perform verification. Under contract, if it is determined during the verification process that a student is attempting to perpetrate fraud, Inceptia will refer the issue to the college and the school will conduct an investigation as to whether the applicant, student, or employee has engaged in fraud or criminal misconduct.

Inceptia will make detailed written referrals of potential fraud or other criminal misconduct to the college Director of Financial Aid at the attending institution and to the CSCC Associate Vice President for Financial Aid Services & Title IV Compliance (Central Office), who will make a report to the college President after investigating the documents. In case of potential employee fraud, the CSCC Associate Vice President for Financial Aid Services & Title IV Compliance and local College President will be notified. In all cases, the attending Connecticut State Community College President will report to the Office of Inspector General (OIG). The attending Connecticut State Community College will fully comply with any requests from the OIG to support the investigation.

PROCEDURE

PROCEDURES FOR IDENTIFYING APPLICANTS WHO MAY NOT BE A “LEGITIMATE” STUDENT:

The college financial aid offices will pull a report each term of:

1. Loan applicants enrolled at least halftime and enrolled only in online courses without prerequisites.
2. Pell eligible applicants who are enrolled only in online courses without prerequisites.

The risk factors being evaluated include two or more applicants who share the following (which could result in the student(s) being identified as a possible financial aid fraud student):

- Share the same phone number or personal email address in the college computer system but not the same permanent address in the college computer system (Gmail addresses are functionally the same if you ignore the punctuation).
- Share the same permanent address in the college computer system, especially if it is an out of state permanent address.
- Share the same bank account number with the college’s vendor for issuing credit balance refunds, but do not have the same permanent address in the college computer system.
- Use the same IP address for 50% or more of their online coursework in college’s distance learning platform for instruction, but do not share the same permanent address in the college computer system.

Other flags for a possible student aid fraud situation which may be explored include:

- Students requesting an early disbursement of their loans to get their refund check.
- Students requesting a one term only loan in the fall semester.
- Any red flag that comes up for a faculty or staff member that a student may not be a legitimate student and could be enrolled to access loan refunds which is referred to the financial aid director for review.

PROCEDURES FOR IDENTIFYING APPLICANTS WHO MAY BE INTENTIONALLY FALSIFYING AID

APPLICATION DATA:

Applicants often make mistakes on their financial aid applications. Processes are in place for the financial aid administrators to identify and verify conflicting data in the files that they review. Sometimes those mistakes may be intentional, but in most cases the error probably is not intentional or if it was, the financial aid counselor would not be able to discern that. Also, based on comments by ED, or if an FAA identifies a situation of conflicting information that warrants it, the financial aid office will institutionally select a student for verification to validate the data provided by the student. Only blatant cases of suspected fraudulent information within the financial aid application will be referred by the Director of Financial Aid to the Title IV Fraud Prevention Committee.

The types of issues that administrators are trained to look for inconsistencies within the application and flag include the following:

- Falsified documents or forged signatures on applications, certifications, verification documents, or loan promissory notes
- False statements of income
- False statements of citizenship
- Patterns of misreported information from one year to the next
- False claims of independent status – therefore documentation is required for students under 24 who are independent for the following reasons:
 - Supporting a dependent

- Marriage
- Orphan and/or Ward of the Court
- Homeless status
- Veterans' status

NEXT STEPS FOR RESOLUTION OF REFERRED OR FLAGGED POTENTIAL FRAUD APPLICANTS:

1. If the Financial Aid Office determines from initial review on available data that there may be a fraud situation and additional data needs to be gathered, the designated office official will notify other student services offices via email, so staff are aware that this process has been initiated.
 - a. Staff should not discuss with the student the reason for the follow up. No mention of suspected fraud should be made to the student, until a determination is made, and then only by the Director of Financial Aid or designated staff member.
2. Additional financial aid verification documents will be added in the college student information system:
 - a. An official copy of the High School Diploma or transcript
 - b. Verification of Educational Purpose and Identity
 - c. With the requirement to meet in person with the director of financial aid or designated staff member to validate, with a 2-week turnaround time to respond.
 - d. In limited circumstances, students who indicate they cannot come in person for various reasons or are in a completely online program and live out of state (too far to drive) will be set up with a virtual appointment to validate with a financial aid administrator.
3. All pending aid disbursements will be placed on hold
 - a. Disbursements already made in the current term may be reversed, pending the outcome.

Requests for additional data will be sent out to other offices as appropriate, which may include:

- Information from the college's vendor for issuing credit balance refunds (any students sharing the same account number?)
- Attendance records from the college's distance learning platform for instruction.
- IP addresses used by the student.

The Financial Aid Office will review the financial aid files for overlap and possible conflicting or suspicious information, and evaluate other data collected once received. Upon review of the information gathered, or if the student doesn't respond to the information requested, The Director of Financial Aid or designates staff will refer the case to the AVP for review and evaluation by the Title IV Fraud Prevention Committee. Follow-up actions may include, but are not limited to:

- Referral to the OIG and cancellation of aid.
- Referral to the Vice President's office for a violation of conduct and possible suspension.
- Official notification to the student from the AVP to inform the student of the review and actions taken.
- Application of system hold to mitigate future enrollment at any other CACC institutions.

REPORTS/DATA TO IDENTIFY POTENTIAL CASES OF TIV FRAUD FOR INVESTIGATION:

A report, which includes loan applicants enrolled halftime in all online classes and all Pell applicants, is run monthly each payment period after registration opens. The following data will be included on the report:

- Permanent address, phone number, and personal email address
- FAFSA permanent address, phone number and student email address

THE TITLE IV FRAUD PREVENTION COMMITTEE WOULD INCLUDE LEADERSHIP FROM SEVERAL OFFICES SUCH AS:

- AVP for Financial Aid Services and Title IV Compliance (chair)
- AVP for Enrollment and Retention Services
- Vice President for Enrollment Management & Student Affairs
- Chief Financial Officer
- The Financial Aid Director from the attending college (as needed)
- Staff from other offices such as Admissions, Learning Assistance/Faculty Systems Support, and Bursar Offices (as needed)

Issues identified by the committee that represent legitimate cases for suspected Title IV fraud are be forwarded to CSCU Counsel for review and a recommendation for referral to the OIG. This includes both suspected student fraud and employee fraud. Meetings would be convened as needed or bi-annually to review the procedures to ensure they are being adequately implemented and are adequate for the needs of the college.

Referrals to the OIG are made by the Associate Vice President of Financial Aid Services & Title IV Compliance.

15.2 INSTITUTIONAL AND THIRD-PARTY FRAUD

POLICY

In 2007, the CT State legacy colleges voluntarily adopted a Financial Aid Code of Conduct in conjunction with the State of Connecticut Attorney General's recommendation. Subsequently, the Code has been adopted by the BOR. The Code restricts payments of any commission, bonus, or other incentive payment based in any part, directly or indirectly, upon success in securing enrollments, or the award of financial aid to any person or entity engaged in any student recruitment or admission activity, or in making decisions regarding the awarding of Title IV federal student aid (FSA) program funds. Financial aid staff are strictly required to adhere to these requirements, and annual training is provided as needed.

To mitigate potential conflicts of interest and the possibility of fraudulent activity, all Financial Aid Office staff are required to recuse themselves from working on the file of any student whom they are related to or have a personal relationship or friendship with.

PROCEDURE

Prompt HR attention and reporting occurs in the case of any employee, third party servicer, or other agent of the school, who acts in a capacity involving the administration of Title IV, HEA programs, or the receipt of funds under those programs may have engaged in fraud, misrepresentation, conversion or breach of fiduciary responsibility or other illegal conduct involving the Title IV, HEA programs.

If there is evidence of fraud by employees of the college or any third-party servicer, instances will be reported to the following positions for review and investigation:

- Associate Vice President for Financial Aid & Title IV Compliance
- Vice President for Enrollment Services
- President
- CSCU Vice President for Human Resources
- CSCU Office of General Counsel

Upon completion of an internal review and investigation, and at the advice of Counsel, the matter may be referred to the OIG by phone at 1-800-HHS-TIPS, and to local law enforcement.

Financial aid staff members recusing themselves from working on the file of students that they are related to or have a personal relationship or friendship must indicate such a relationship to the Director of Financial Aid. The Director will assign another staff member to assume responsibility for the student's application and record. The Director must document this in the RHACOMM form in Banner.

Should the relationship involve the Director of Financial Aid, the Director shall indicate such a relationship to the Associate Vice President for Financial Aid Services & Title IV Compliance, who will assign another staff member to assume responsibility for the student's application and record. The AVP must document this in the RHACOMM form in Banner.

15.3 REFERRALS

POLICY

If an employee suspects a student, another employee, third party servicer, or other individual has misreported information and/or altered documentation to increase student aid eligibility or to obtain federal funds fraudulently, the employee will report those suspicions to one or more of the following college leaders, depending on the type of suspected fraud, as outlined in the sections above:

- Associate Vice President for Financial Aid & Title IV Compliance
- Vice President for Enrollment Services
- President
- CSCU Vice President for Human Resources
- CSCU Office of General Counsel

If a determination is made to refer the case as suspected fraud to the OIG, the Associate Vice President for Financial Aid & Title IV Compliance will do so via a special complaint form online at <https://www2.ed.gov/about/offices/list/oig/hotline.html>, or via phone at 1-800-MIS-USED.

PROCEDURE

For cases of suspected student fraud, the CSCC Associate Vice President for Financial Aid & Title IV Compliance will lead an investigation of the matter through the Title IV Fraud Prevention Committee in collaboration with the college Financial Aid Director. Refer to Section 15.1 for more information.

In cases of suspected employee or third-party servicer fraud, the CSCU Vice President for Human Resources in the CSCU System Office, in collaboration with the CSCC Vice President for Enrollment Management & Student Affairs, will convene an ad hoc committee. The committee shall review the situation and investigate the matter, to include the appropriate college staff, as well as consultation with CSCU General Counsel as appropriate. Refer to Section 15.2 for more information.

If a situation of suspected Title IV fraud is not dismissed as a possibility, the Associate Vice President for Financial Aid & Title IV Compliance will be directed to make the referral to the OIG via the OIG Hotline: Fraud Prevention Website using the Hotline Compliant Form online.

The OIG Hotline: Fraud Prevention website (<https://www2.ed.gov/about/offices/list/oig/hotline.html>) contains information on the various methods by which a school can report suspected fraud, including:

- Completing a Hotline Complaint Form online
- Downloading a hardcopy of the Hotline Complaint Form, completing it, and mailing or faxing it to the OIG
- Calling the toll-free number (1-800-MIS-USED)
- Calling an OIG in the school's area (a list of offices and telephone numbers are provided in the FSA Handbook)

Examples of discrepancies that may be reported to the Inspector General include but are not limited to:

- False identity claims
- Forgery of signatures or certification
- False certification (Drug Free Workplace; Educational Purpose)
- False statements of income and assets
- Breach of fiduciary responsibility by an employee

SECTION 16: AUDITS

16.1 TYPE OF AUDIT

POLICY

CT State falls under the review of the State of Connecticut auditing system which is independent of the BOR. The Auditors of Public Accounts (APA) is a legislative agency of the State of Connecticut with the primary mission to audit state agencies. The office is under the direction of two state auditors appointed by the state legislature.

PROCEDURE

Annually, at least one of the twelve Connecticut State Community Colleges is subject to a compliance audit through a site visit under the state auditing system. All other institutions have student data reviewed annually, despite not being selected for a site visit. This procedure satisfies the U.S. Department of Education's annual Single Audit requirement.

The audit cycle typically begins in May of the fiscal year which is subject to audit. The Principal Auditor contacts the Associate Vice President for Financial Aid Services & Title IV Compliance for a preliminary set of data for each of the twelve institutions as a basis for review. The data is delivered electronically through the State of Connecticut Secure File Transfer System (<https://sft.ct.gov/>), which is accessed through CSCU's Protective Enclave. The audit concludes after the initial FISAP submission date.

College Directors of Financial Aid Services are notified electronically by the Principal Auditor, or designate, that their institution will be the subject of APA's annual site visit. The Principal Auditor, or designate, also requests a list of items in preparation for the site visit for review. Institutions not subject to the annual site visit will be notified via email by the Principal Auditor, or designate, to the college Director of Financial Aid Services for any audit related questions or tests based on a review of the data initially provided.

Audit reports are published for public review: <https://wp.cga.ct.gov/apa/>

16.2 AUDIT SUBMISSION SCHEDULE

POLICY

For institutions selected for compliance audits of any kind, the Director of Financial Aid shall notify the Associate Vice President for Financial Aid Services & Title IV Compliance. The AVP shall serve as the point of contact, as necessary, for each compliance audit. The AVP shall also review each audit document and provide responses as appropriate and in conjunction with the Director of Financial Aid.

A compliance audit is performed annually for each of the Connecticut State Community Colleges by the Auditors of Public Accounts for the State of Connecticut. Completed audits within the Single Audit report are transmitted through the Federal Audit Clearinghouse.

The Connecticut Office of Higher Education (OHE) performs compliance audits related to the Roberta B. Willis Scholarship Program. The basis of the audit is derived through the statutorily mandated Unit Data Reports to OHE.

PROCEDURE

Since all 18 publics in the State of Connecticut are included in this compliance audit (including the state flagship not under the purview of the BOR), there is typically one institution that submits through ED's eZ-Audit system on behalf of all others.

For the Roberta B. Willis Scholarship program audits conducted by OHE, the frequency of audit appears to be on a biannual schedule, but subject to the discretion of OHE. OHE conducts a site visit for each selected institution. At the conclusion of the audit, OHE will provide their findings in writing. The institution has the opportunity to accept or refute any findings in writing to OHE within 45 days. OHE will provide a response, as appropriate.

The AVP shall serve as the point of contact, as necessary, for each compliance audit. The AVP shall also review each audit document and provide responses as appropriate and in conjunction with the Director of Financial Aid.

SECTION 17: BANNER-RELATED DOCUMENTATION

POLICY

The Central Office maintains documentation related to the effective use of the financial aid module of the Banner student information system

PROCEDURE

Refer to the Central Office's website for information on the following topical areas:

- Policies & Procedures
- Processes & Reports
- Updates & Training
- Reference Materials
- Financial Aid Research & Analysis
- Contact & Support Information
- College Financial Aid Director Contact Information
- Forms
- Resources

The main page is located at <http://www.commnet.edu/finaid/default.aspx>.

All Banner procedural documentation is located at http://www.commnet.edu/finaid/Policies_Procedures.aspx.

SECTION 18: APPENDICES

18.1 FORMS AND CORRESPONDENCE

SECTION 1: MANUAL OUTLINE

No appendices

SECTION 2: ADMINISTRATIVE ORGANIZATION AND OFFICE MANAGEMENT

The organizational chart for Connecticut State Community College is in transition. This link provides the most recent iteration:

<https://www.ct.edu/files/pdfs/CT%20State%202023%20Organizational%20Structure%20with%20Bookmarks.pdf#page=71>.

FINANCIAL AID POLICY, PHILOSOPHY, AND CODE OF CONDUCT FOR CSCU COMMUNITY COLLEGES

<https://www.ct.edu/files/policies/5.9%20Financial%20Aid%20Policy%20Philosophy%20Code%20of%20Conduct%20Community%20Colleges.pdf>

JOB DESCRIPTIONS FOR FINANCIAL AID POSITIONS

Applicable job descriptions for financial aid staff are located at <https://www.ct.edu/hr/admin>.

MONTHLY FINANCIAL AID CALENDAR

Due to the routine update and maintenance of this calendar, it is not maintained in a publicly available space for widespread consumption. This calendar is available upon request.

SECTION 3: FINANCIAL AID PROGRAMS

No Appendices

SECTION 4: INSTITUTIONAL REQUIREMENTS RELATING TO EDUCATIONAL LOANS

No Appendices

SECTION 5: STUDENT CONSUMER INFORMATION REQUIREMENTS

No Appendices

SECTION 6: APPLICATIONS AND FORMS

AID APPLICATION FOR UNDOCUMENTED STUDENTS

<https://www.ct.edu/admission/finaid#undocumented>

SECTION 7: FILE REVIEW AND VERIFICATION

No Appendices

SECTION 8: STUDENT BUDGETS

No Appendices

SECTION 9: PACKAGING FINANCIAL AID

No Appendices

SECTION 10: PROFESSIONAL JUDGMENT

SPECIAL CIRCUMSTANCES FORM

<http://www.commnet.edu/finaid/Documents/2021-22%20Special%20Circumstances%20Appeal%20Form.pdf>

PACT APPEAL FORM

<https://www.ct.edu/files/pdfs/PACT%20Appeal%20Form.pdf>

SECTION 11: DISBURSEMENTS

No Appendices

SECTION 12: SATISFACTORY ACADEMIC PROGRESS

SAP POLICY

<https://www.ct.edu/files/policies/1.1%20Satisfactory%20Academic%20Progress%20Policy.pdf>

SAP APPEAL FORM

<http://www.commnet.edu/finaid/Documents/Satisfactory%20Academic%20Progress%20Appeal%20Form.pdf>

SECTION 13: RETURN OF TITLE IV FUNDS

No Appendices

SECTION 14: INSTITUTIONAL REFUNDS

POLICY ON REFUND AND COURSE WITHDRAWALS

<https://www.ct.edu/files/policies/3.7-refund-policy.pdf>

SECTION 15: TITLE IV FRAUD

No Appendices

SECTION 16: AUDITS

No Appendices

SECTION 17: BANNER-RELATED DOCUMENTATION

http://www.commnet.edu/finaid/Policies_Procedures.aspx

18.2 RESOURCES AND REFERENCE DOCUMENTS

- 150% Direct Subsidized Loan Limit Repeal Information
- 2024-25 Draft Student Aid Index (SAI) and Pell Grant Eligibility Guide (formerly the EFC Formula Guide)
- *Audit Guide, Audits of Federal Student Financial Assistance Programs at Participating Institutions and Institution Servicers*
- Clery Act Appendix for FSA Handbook
- Code of Federal Regulations (CFR)
- *Cohort Default Rate Guide*
- *Common Manual: Unified Student Loan Policy*, Council on Higher Education Loan Programs
- *Common Origination and Disbursement (COD) System Technical Reference*
- Coronavirus Aid, Relief, and Economic Security (CARES) Act Information
- Dear Colleague/Partner Letters
- Electronic Announcements
- *Electronic Data Exchange (EDE) Technical Reference*
- Federal Pell Grant Payment and Disbursement Schedules
- *Federal Registers*
- *Federal Student Aid Handbooks*
- Federal Student Aid Training
- *FISAP Technical Reference*
- *Foreign School Audit Guide*
- *Guide for Audits of Proprietary Schools and for Compliance Attestation Engagements of Third-Party Servicers Administering Title IV Programs*
- *Guide for Financial Statement Audits and Compliance Attestation Engagements for Foreign Schools*
- *Health and Human Services Student Financial Aid Guidelines*
- Higher Education Emergency Relief Fund (HEERF) Information [Including HEERF I, HEERF II, and HEERF III]
- NASFAA Monographs
- NASFAA Quick Reference Guides
- NASFAA Tip Sheets
- NASFAA's Aid Offer Comparison Worksheet

- NASFAA's AskRegs Service and Knowledgebase Q&As
- NASFAA's Comprehensive List of Consumer Information and Disclosure Requirements
- NASFAA's Compliance Engine
- NASFAA's Compiled Title IV Regulations
- NASFAA's Coronavirus (COVID-19) Web Center
- NASFAA's Fresh Start Web Center
- NASFAA's How-to-Guides
- NASFAA's Tax Transcript Decoder
- NASFAA's *Title IV Eligibility Checklist: Considerations for Adding New Programs and Locations*
- NASFAA U *Self-Study Guides*
- NASFAA Webinar materials
- *NSLDS Enrollment Reporting Guide*
- *NSLDS Newsletters*
- *NSLDS User Guide for Transfer Student Monitoring on the Web*
- Program Integrity Information - Questions and Answers
- *Program Review Guide for Institutions*
- *SAR Comment Codes and Text Guide*
- *SAVE System Instructions for U.S. Department of Education (School) Users Version 3.0*
- Student Aid Reference Desk (Ref Desk)
- *The EFC Formula Guide*
- *The ISIR Guide*