Merced College
2025-2026 Merced College P&P

11/16/2026

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Section 1: Manual Introduction

1.1 Introduction to the Financial Aid Office

Include a statement introducing your school's financial aid office to staff and others (such as appeals committees, other offices, or auditors) that may have reason to use or review the information contained in your policies and procedures manual.

Include the financial aid office's:

- Location(s)
- Hours of operation
- Fax and telephone numbers
- Email address
- Public website
- Social media sites, as applicable

Clarify the use and scope of the manual.

Response:

Federal regulations mandate that institutions have written policies and procedures. In addition to the federal requirement, there are many benefits to having a written document outlining Federal Student Financial Aid policies and procedures.

These benefits include:

- Distribution of information to appropriate offices outside the financial aid office for the purpose of informing and fostering an understanding of the complexity and operation of financial aid.
- As a referral guide to assist in maintaining consistency in the problem-solving process.
- As an important component of a comprehensive training program.

The Merced Community College District (MCCD) financial aid offices coordinate federal, state, private, and institutional financial aid programs for both the Merced College main campus and the Los Banos campus. This entails determining student eligibility for the various financial aid programs, and assisting students in trying to determine their best financing options.

Merced College:

- Financial aid office mailing address: 3600 M Street, Merced, CA 95348
- Financial aid office physical address: Lesher Student Services Building, 3rd Floor, Room 312
- Phone number: 209.384.6031
- Hours of operation: Monday - Friday, 8:00 a.m. to 5:00 p.m.

Los Banos Campus:

- Financial aid office mailing address: 3600 M Street, Merced, CA 95348
- Financial aid office physical address: 22240 Highway 152, Building A, Los Banos, CA 93635
- Phone number: 209.826.3495
- Hours of operation:
  - Monday: 8:00 a.m. - 2:45 p.m.
  - Tuesday-Friday: 8:00 a.m. - 5:00 p.m.*

* Thursday closed 12:00 p.m. - 2:00 p.m. Friday closed 1:00 p.m. - 2:00 p.m.

Email address: financialaid@mccd.edu

1.2 Purpose and Philosophy of the Financial Aid Office

To provide perspective to individual policies, include:

- The institution's mission statement
- Operative financial aid principles
- A brief history of the institution's financial aid operation
- The philosophy of the financial aid office

Include a statement that describes how the philosophy and operation of the financial aid office complement and support the school's philosophy and mission.

Response:

Statement of Purpose:

The purpose of this manual is to record policies and procedures surrounding the delivery of financial aid for the MCCD financial aid offices. If no policy or procedure addresses a given issue, the director of financial aid (DFA) will use professional judgment based upon the intent of all financial aid programs and office practices. For purposes of this manual, definitions of policy and procedures are as follows:

Policy: A statement that guides present and future decisions and actions.

Procedure: A series of steps to be followed in order to properly administer all financial aid programs.

This manual is intended to provide the following:

- Provide the financial aid staff and interested parties with current policies and procedures that pertain to eligibility assessment for federal, state, and college programs.
- Provide all staff members with general and specific responsibilities of the office, their individual responsibilities, and the financial aid office relationship to other departments within the MCCD.
- Provide each staff member with general office procedures in order that a systematic and consistent approach may be taken in the operation of all programs, ensuring that similar operations will be handled in a uniform manner.
- Provide a quick reference to various practices.
- Facilitate the orientation and training of personnel when changes occur.

Financial Aid Purpose:

The purpose of financial aid within the MCCD financial aid offices is to ensure that all students have an opportunity to obtain a college education, and that no student will be denied that opportunity because of lack of funds. Most financial aid is awarded to students based on financial need to meet college costs. Therefore, the financial aid application process is set up to uniformly measure how much financial aid each individual student needs for college based on the individual circumstances of the student and the student's family.

- Each college in the MCCD has an obligation to assist eligible students in realizing their goals.
- MCCD financial aid offices will publish an annual cost of attendance (COA) budget that states total student expenses realistically by including, where applicable, off-campus costs, At-home costs for dependent and independent students, including room and board, cost of books, cost of transportation, personal expenses, and miscellaneous expenses; and a COA for students enrolled less-than-half-time (less than six units).
- Parents are expected to contribute according to their means, taking into account their income, assets, number of dependents, and other relevant information. Students themselves are expected to contribute from their own assets and earnings, including appropriate borrowing against future earnings.
- Financial aid will be offered only after a determination that the resources of the family are insufficient to meet the student's educational expenses. The amount of aid offered will not exceed the amount needed to meet the difference between the student's total educational expenses and the family's resources.

- The amount and type of self-help expected from students will be related to the circumstances of each individual.
- The financial aid office will review its financial aid COA budgets annually and adjust them, if necessary, to reflect changes in the financial needs of students and the expenses of attending any MCCD college. MCCD financial aid offices have an obligation to inform students and parents of the financial aid offer once eligibility has been determined and verification completed, based on the financial aid office's receipt of a Free Application for Federal Student Aid (FAFSA) Submission Summary (FSS) and/or the Institutional Student Information Report (ISIR) or a California Dream Act Application (CADAA).
- Because the amount of financial aid awarded reflects the economic circumstances of students and their families, all MCCD colleges will refrain from any public announcement of the amount of aid offered and encourage students and others to respect the confidentiality of this information.
- All documents, correspondence, and conversations between and among aid applicants, their families, and the financial aid office are confidential and entitled to the protection ordinarily arising from a counseling relationship.

The objectives of the financial aid office revolve around the major functions of the office. Those functions include:

- The awarding and disbursal of funds.
- Reporting at the institutional, state and federal levels.
- Providing a satisfying, open-door policy to assist students.

Merced Community College District Mission Statement:

The MCCD mission is to promote student success, to provide our diverse community with educational opportunities, and to transform lives.

Financial Aid Office Mission Statement:

Central to the purpose of financial aid is the belief that each student and that student's family, to the extent possible, have the primary responsibility to pay for the student's college education. Financial aid is made available to assist students when family resources are not sufficient to meet college costs.

Philosophy:

MCCD believes that a consistent and equitable approach to the awarding of financial aid will enable students to attend Merced Community Colleges who would not otherwise have the financial resources to enroll. It thereby encourages a student population that is culturally, economically, socially and geographically diverse.

Goals:

The goal of the MCCD financial aid offices is to provide financial assistance to those in need, thereby allowing eligible students to continue their education. The financial aid programs at MCCD are administered according to the following principals:

- The primary responsibility for financing education lies with the students and their families. When the total resources they can provide do not meet expenses, MCCD will do as much as possible to assist so that the student will not be denied an education.
- Interested individuals will be made aware throughout the year of financial aid opportunities. Students must submit a FAFSA or a CADAA each year for which they expect to be considered for financial aid.
- A confidential financial aid package will be developed and offered to a student based on individual need and circumstances, but without regard to age, sex, race, color, religion, national origin or disability.
- Planning/counseling sessions are important. They can help students plan for the most efficient use of their resources for education, including their own and any financial aid they may have received. They are held on an as-needed basis with any student.

The MCCD financial aid offices operate within federal and state guidelines and adhere to all other standards of individual programs.

1.3 Policies and Procedures Development Responsibilities

Avoiding Implicit Bias with Staff Engagement



Engage your staff in reviewing your policies, processes, and forms. This will help to ensure a larger representation of different perspectives has been involved, but this will also help to convey to your staff that creating an inclusive environment is a priority at your school. Be open to feedback from both staff and students.

Aid offices are encouraged to create email and counseling standards for staff to use when communicating with students and parents, incorporating the form guidance outlined above. It is important to incorporate language in all our student interactions.

Include a summary of the policies and procedures development process at your school and specify who has responsibility for policy development. If a financial aid committee influences policy development, define its role. Identify the committee members' positions within the school's organizational chart.



In areas where other offices and personnel share responsibility in the implementation of financial aid policies and procedures, a good practice would be to involve personnel from those offices in the policies and procedures development process. If the institution uses this approach, identify the positions of those personnel, and include a description of their roles in this section.

Response:

The MCCD director of financial aid (DFA) will ensure that each college and interested parties have adequate representation when policies and procedures are being developed, changed, or discussed.

The policy and procedure committee may consist of a group of representatives district-wide; recommended to include a vice president of student services, a dean of students, and a financial aid supervisor, along with a representative from the following departments:

- The admissions and records office.
- The counseling office.
- The business and fiscal services office.

1.3.1 Responsible Personnel

Add a brief statement about who is responsible for ensuring others are aware of any change to existing policies and procedures or the development of new ones. Include information about the latest update and how often policies and procedures are reviewed.



A good practice may be to develop a method for notifying other offices and/or personnel of policies and procedures changes. Email lists or listservs, for instance, are a good idea and are relatively easy to implement.

Response:

Under the supervision of the district director of financial aid, financial aid supervisors will be the persons responsible for ensuring that their individual campus is aware of any changes to existing policies and procedures or the development of new policies. If new programs are being added, it will be the responsibility of the vice president of instruction to notify the financial aid supervisor so that information can be added to the Program Participation Agreement (PPA) and submitted to the Department of Education (ED) for funding approval. Policies and procedures will be updated on an annual basis.

1.3.2 Documents and Methods

Indicate what documents and methods are used to keep abreast of new regulations, laws, and U.S. Department of Education (ED) policy guidance that might impact the financial aid office's policies and

Resources:

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procedures. Add a cross-reference to the list of resources and reference documents in the appendix of the manual. Point out the location of these paper and/or electronic documents and who is responsible for keeping the financial aid office's collection of publications current.

Include any electronic method used to make the school aware of statutory and regulatory changes that may affect your policies and procedures. For example, ED's Knowledge Center, a part of the FSA Partners website, has a notification service that sends subscribers daily or weekly emails of recent Knowledge Center postings, such as Dear Colleague Letters, Electronic Announcements, and Federal Registers. Although schools are not required to subscribe to this notification service, they must have access to the FSA Partners site and keep abreast of all Title IV statutory or regulatory changes and any new ED guidance.



Also, NASFAA's daily *Today's News* announces changes to the statute, regulations, and ED guidance as they occur. The financial aid office and other institutional personnel should subscribe to these services.

Response:

Financial aid reference documents and publications are kept in two locations:

- District Office (district director of financial aid).
- Individual campus financial aid offices.

The MCCD financial aid offices will use the following reference documents published by ED and professional organizations:

- Federal Student Aid Handbook
- FSA Partner Connect
  - Electronic Announcements
  - Handbooks, manuals, and guides
  - Federal Registers
  - Dear Colleague Letters
- State Chancellor's Office - Chief Financial and Administrative Officers (CFAO)
- California College Promise Grant (CCPG) manual
- National Association of Financial Aid Administrators (NASFAA) Newsletters
- California Community College Newsletters
- California Student Aid Commission (CSAC) Alert Letters
- CSAC Cal Grant Manual
- California Association of Financial Aid Administrators Association (CASFAA) Releases
- California Community Colleges Student Financial Aid Administrators Association (CCCSFAAA) Federal and State regulatory Releases

The MCCD financial aid offices will maintain memberships in the following professional associations:

- National Association of Student Financial Aid Administrators (NASFAA).
- California Community Colleges Financial Aid Administrators Association (CCCSFAAA).
- California Association of Financial Aid Administrators (CASFAA).
- Western Association of Student Financial Aid Administrators (WASFAA).

The DFA and each financial aid supervisor will subscribe to receive regulatory notifications from the following listservs in order to ensure that they have the most current regulations and statutory information, along with receiving daily announcements that might have an impact on federal and state financial aid.

- CFAO
- CCCSFAAA
- CSAC
- NASFAA
- CASFAA
- WASFAA

1.4 Implicit Bias Awareness & Individual Development Policy



Best Practices for Implicit Bias Awareness & Individual Development

1. **Acknowledge implicit bias exists.** It is impossible to escape the influences and consequences of our country's history. Despite our best intentions and efforts, none of us are immune to implicit bias. It is a universal human experience so accepting this reality is a key first step in addressing implicit bias.

2. **Get curious about your own biases.** Take the Harvard Project Implicit Bias Test; it provides an opportunity for self-understanding of our own individual biases.

3. **Create new and deeper connections**. Start a conversation to create deeper connections and get to know people who come from different backgrounds or have different perspectives than you.

4. **Reconsider stereotypes.** We must challenge and question the assumptions we make about others with the goal of fair treatment for everyone, regardless of their identities.

5. **Consider whose voices are and are not represented.** In meetings, committees, and other places where decisions are made, ensure diverse perspectives are included and authentically welcome.

6. **Foster learning and training.** Encourage, create, and utilize campus, community, and online resources to engage in diversity, equity, inclusion, and social justice learning and training focused on implicit bias. Seek out learning through articles, videos, podcasts, etc., and participate in training opportunities that encourage learning about implicit bias.

7. **Develop action steps.** Use the guiding questions and information in the "Why Do Diversity & Inclusion Matter" section of the NASFAA Diversity Toolkit to develop awareness and action steps.

Policies

Response:

The MCCD financial aid offices strive to engage staff in development opportunities to learn more about implicit bias, the ways in which they can take action to challenge stereotypes and be mindful of others when decisions are made and communications, i.e., websites, emails, etc., are developed. The MCCD financial aid offices are committed to furthering access to students from diverse backgrounds and fostering understanding among staff about best practices for engaging with students from diverse backgrounds and developing communications that are inclusive.

This policy will be reviewed annually with the DFA to ensure its continued relevance and effectiveness in promoting an inclusive and equitable environment within the MCCD financial aid offices.

Procedures

Response:

Training Programs:

- Implement regular training programs on implicit bias awareness for all staff members in the MCCD financial aid offices.

Self-Assessment Tools:

- Encourage staff members to reflect on their attitudes and beliefs and how they might influence

their decision-making processes.

Cultural Competency Training:

- Include discussions on how cultural nuances may influence financial aid processes and interactions with students.

Inclusive Policies and Procedures:

- Review and update financial aid policies and procedures to ensure they are inclusive and considerate of diverse needs.
- Incorporate feedback from staff members who may have insights into potential biases within existing processes.

Diverse Hiring Practices:

- Promote diversity in the recruitment and hiring process for the MCCD financial aid offices.

Inclusive Language and Communication:

- Promote the use of inclusive language in all communications, both internal and external.

Leadership Commitment:

- Demonstrate leadership commitment to diversity, equity, and inclusion by actively participating in initiatives and communicating the importance of these values.

1.X - Reserved for Institutional Use

This section is reserved for any institution-specific area of policies and procedures not covered in previous sections. It may be necessary to include several sub-sections of institution-specific content within this area. If there is no institutional content, simply leave the area blank, or mark the box Complete as preferred.

Section 2: Administrative Organization and Office Management

2.1 Institutional and Divisional Structure

In this section, show compliance with the regulations which require written procedures or written information regarding the responsibilities of various offices with respect to the offering and disbursing of aid.

Include a statement which clearly demonstrates compliance with the checks and balances and separation of functions requirements.

Include institutional, divisional, and office organizational charts to illustrate the school's structure.

Summarize areas of responsibilities and relationships between various offices, such as the registrar, accounting, bursar, admissions, academic affairs, scholarships, and financial aid offices. Include all offices that play any role in administering and ensuring compliance for Title IV programs and provide a list of designated contacts in these offices. You might use a flow chart to illustrate the relationships between offices.

 The use of flowcharting is illustrated in NASFAA's "Formulating, Implementing, and Evaluating Policies and Procedures Guide."

Resources:

668.16(b)(3)
668.16(c)
668.16(b)(4)
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024

Response:

The Merced Community College District (MCCD) financial aid offices have adequate checks and balances for separating the responsibilities of awarding and disbursing aid. It recognizes that there must be separation of duties to correctly oversee the administration of financial aid and has outlined what each office's primary responsibility should be.

The Financial Aid Office:

The financial aid office is responsible for determining a student's eligibility for financial aid, and the student fees office is responsible for the disbursement of the financial aid. This separation of duties creates the necessary checks and balances to meet federal compliance. The MCCD has a tier one (T1) arrangement with a third-party servicer called BankMobile Disbursements, a technology solution, powered by BMTX, Inc. for the disbursing of credit refunds.

The student has choices on how to receive their refund:

- Deposit to an existing account: the funds are transferred to an existing account the same business day BankMobile receives funds from the school. It takes one or two business days for the receiving bank to credit the money to a student's account.
- Deposit to a BankMobile Vibe checking account: If a student opens a BankMobile Vibe checking account, funds are deposited on the same business day BankMobile receives funds from the school.
- Paper check: If the student does not choose one of the above two options, a paper check will be issued to the student. Students are instructed to be sure their address is updated by visiting the admissions and records office in person.

The Student Fees Office:

The student fees office ensures that credit refunds are released in a timely manner so that cash management rules are met.

- No office at the MCCD has both the functions of authorizing payments and disbursing or delivering funds for any student receiving FSA funds.
- The financial aid office awards financial aid funds and authorizes the disbursement of that aid. The student fees office disburses/delivers this assistance to the student's account.
- No individual authorizes both aid and disburses the aid.
- These two functions are performed by individuals who are not members of the same family—where family is defined. No one individual authorizes aid and disburses the aid. Additionally, these departments do not employ both a parent, sibling, spouse, child, spouse's parent or sibling, or sibling's or child's spouse to process opposite sides of these functions (authorization and

disbursement).

- These two functions are performed by individuals who do not together exercise substantial control over the school.
- No one person has the computer rights to change data that affect both authorization and disbursement.

2.2 Financial Aid Office Structure and Position Responsibilities

In this section, you can show how you comply with the requirement to provide trained and adequate staffing for the administration of Title IV aid. Americans with Disabilities Act (ADA) facilities requirements for employees might also be addressed here. Include the following:

- The financial aid office organizational chart
- A diagram of the physical layout of the office, indicating where staff members are stationed, if possible
- A summary of the areas of responsibility within the financial aid office including, at a minimum, job descriptions for financial aid office positions.

Resources:

668.16(b)(2)
668.16(b)(1)
28 CFR 35
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024
28 CFR 36.301-311
34 CFR 104

Response:

Title	Name
Director of Financial Aid	Jason Judkins
Financial Aid Coordinator	Marysol Contreras
Financial Aid Outreach Coordinator	Arturo Garcia
Financial Aid Advisor	Andraya Gutierrez
Financial Aid Advisor	Vacant
Financial Aid Advisor	Delia Regalado
Financial Aid Advisor	Selina Setterberg
Financial Aid Technician	Andrea Maravilla
Financial Aid Technician	Bradly Peltier
Financial Aid Technician	Ashleigh Rice
Financial Aid Technician	Nora Rocha
Financial Aid Technician	Alexia Casillas
Financial Aid Technician	Tiffany Ramirez
Student Services Assistant	Brandon Iniguez

Director of Financial Aid (DFA):

Responsibilities of the DFA aid include but are not limited to:

- Provide policy and regulatory analysis.
- Provide guidance on training and cross training.
- Provide technical infrastructure support and lead MCCD collaboration during implementation of financial aid system conversion.
- Work directly with the financial aid system analyst and IT Ellucian Colleague programmers to ensure proper system integrity and integration.
- Develop a policy and procedure manual giving guidance, consistency and a standard method of processing a student's file.
- Respond to audit findings, file federal, state and/or local reports in cooperation with the college(s).
- Assist with the preparation and filing of responses to audit exceptions reports.
- Assist with the submission of federal and state reports that impact the district office (such as BFAP, FISAP, and MIS) with review of college data transmission for accuracy.
- Keeps current on changes in laws and regulations to ensure that the district remains in compliance.
- Prepares required reports and reconciliation payment documents.

- Maintains financial aid disbursement records.
- Monitors financial aid awarding system processes.
- Monitors financial aid operations.
- Manages campus Cohort Default Rate.
- Evaluate financial aid staff performance at each college to ensure each financial aid office is following federal and state regulations and following consistent guidelines.

Financial Aid Coordinator (FAC):

Responsible for the Federal Student Aid (FSA) programs and the California Student Aid Commission (CSAC) to ensure that the MCCD:

- Advises and counsels students and parents about financial aid.
- Assists in the development and/or revisal of the written policies and procedures manual.
- Determines students' eligibility for financial aid.
- Makes financial aid awards to students.
- Monitors students' satisfactory academic progress (SAP).
- Maintains school and student records, documents, the administration of financial aid, and provides data for reports.
- Reconciles student originations and disbursements through COD.
- Maintains federal and state electronic security agreements.
- Maintains accurate records in the financial aid systems.
- Coordinates state grants programs.
- Processes Pell Grants, FSEOG, Federal Work Study (FWS) eligibility, Cal Grants, EOP and CARE Grants, Student Loans, Private Scholarships, CHAFEE Grants, Dream Act awarding, and the Governor's Fee waiver Program.

Financial Aid Outreach Coordinator (FAOC):

- Advises and counsels students and parents about financial aid.
- Exercise professional judgment during student appointments for dependency overrides, income adjustments, unaccompanied youth and other special circumstances.
- Outreach:
  - Establish and maintain liaison with community agencies/groups, area high schools, and adult schools to promote and assist with the application for financial aid programs.
  - Give presentations on campus as requested: guidance classes and division meetings, nursing student orientations, college night, and others as requested.
- Create financial aid flyers and brochures.
- Meet with students and their parents as requested.

Financial Aid Advisor (FAA):

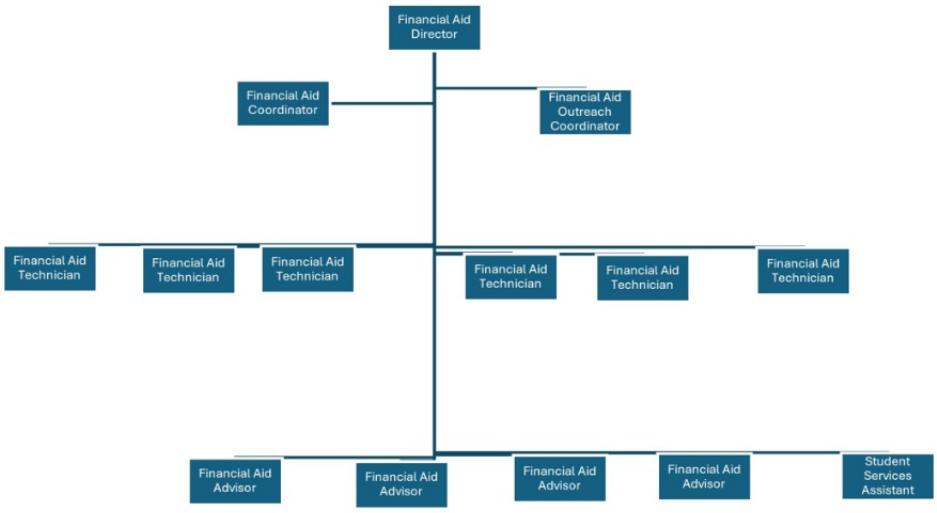
- Reviewing students' file for completeness and accuracy,
- Advises and counsels students and parents about financial aid.
- Packaging student files, counseling students/parents regarding financial aid rules and regulations,
- Notifying students by email/mailers concerning Satisfactory Academic Progress (SAP) during the semester;
- Answering students' questions regarding mailers.

Financial Aid Technician (FAT):

- Reviewing students' file for completeness and accuracy.
- Advises and counsels students and parents about financial aid.
- Packaging student files, counseling students/parents regarding financial aid rules and regulations.
- Reconciling Title IV and state funds on a monthly schedule.
- Performing Return to Funds (R2T4) calculations.
- Notifying students by email/mailers concerning Satisfactory Academic Progress (SAP) during the semester.
- Answering students' questions regarding mailers.
- Coordination of Petitions Committee.
- Reconciles Cal Grants through WebGrants.
- Processes federal student loan applications.
- Calculates the Return of Title IV funds, and authorizes post-withdrawal disbursements to students.

Student Services Assistant (SSA):

- Advises and counsels students and parents about financial aid.
- Accepts and evaluates applications of potential program participants.
- Interviews potential participants and completes preliminary determination of eligibility to participate in program involved.
- Assists students by providing information regarding the types of services available.
- Gathers and compiles data regarding needs and status of students.
- Assists students with applications and checks applications for accuracy and completeness.



2.2.1 Personnel Policies

Policies

The school's policies should include the conditions for hiring, evaluating, promoting, taking disciplinary action, and terminating a staff member. Include your school's policies for conducting background checks when hiring new staff, particularly in management and supervisory positions, and whether they have been debarred or suspended by a federal agency.

Also address policies for not knowingly hiring any individuals who have committed crimes involving federal, state, or local government funds. The policies should indicate that it will not knowingly hire individuals who:

Resources:

2 CFR 3485
668.14(b)(18)(i)
601.21
668.14(b)(27)
668.14(b)(22)
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024
668.14(b)(18)(iii)

- Have been convicted of, plead nolo contendere, or found guilty of a crime pertaining to funds from federal, state, or local government sources;
- Have been either administratively or judicially determined to have committed fraud pertaining to funds from federal, state, or local government sources;
- Owe a liability for violation of requirements for Title IV or HEA program funds and are not making either payments according to the repayment agreement of the liability; or
- Have experience at a school that incurred a federal fund loss in excess of five percent of the school's annual Title IV program funds (for schools with a ten-percent or higher equity owner).

34 CFR 84
668.14(c)(1)
668.14(b)(28)
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024
668.16(d)(2)
Federal Register, 7/28/09, p. 37446
2024-25 FSA Handbook, Vol. 2, Ch. 1, August 2024

You may want to cross-reference the school's human resources, employment, or personnel manual, if applicable.

You might want to describe or cross-reference your school's policies for compliance with applicable anti-discrimination and civil rights statutes and regulations. Drug-free workplace requirements might also be addressed or cross-referenced here if the school receives campus-based funds.

If your school participates in any Title IV loan program, state your school's code of conduct prohibiting conflicts of interest by financial aid office staff related to the Title IV loan programs. Include the following:

- Identification of all personnel covered by the code
- Policies for administering, publicizing, and enforcing the code

State your institution's policies governing the activities (e.g., service on advisory boards) of institutional employees and officers having financial aid responsibilities (including education loans and institutional financial aid) with a private education loan lender or group of lenders. Include policies regarding expenses paid for or provided by a private education loan lender or groups of lenders and reporting those expenses to the U.S. Department of Education (ED). Include or cross-reference any applicable state government reimbursement policies.

If your institution or any institution-affiliated organization participates in a preferred lender arrangement, indicate whether your institution has adopted a single code of conduct to address participation in a Title IV loan program as well as participation in a preferred lender arrangement (see Section 4.2.5).

Response:

In support of a safe, ethical, and compliant educational environment, the MCCD maintains clear and comprehensive policies governing the employment lifecycle of staff members. These policies outline job descriptions, union agreements, promotion, disciplinary action, and termination. Background checks are a critical part of the hiring process, ensuring that individuals have not been debarred or suspended by federal agencies and have no disqualifying criminal history involving misuse of federal, state, or local government funds. The MCCD is committed to not knowingly employing individuals who violate federal or state financial regulations, including those related to Title IV or the Higher Education Act (HEA).

Procedures

Include procedures for checking the debarment or suspension status of potential employees during the hiring process, as well as how the school checks to ensure it does not knowingly hire employees who have committed crimes involving Title IV aid. Include information on performance evaluations (e.g., evaluation criteria, frequency, appeals, etc.) The procedures should also address absence approvals and dress code. You may want to cross-reference the school's human resources, employment, or personnel manual, if applicable.

Describe or cross-reference how financial aid office employees are informed of anti-discrimination, civil rights, and drug-free workplace (if receiving campus-based funds) requirements, and explain how all are enforced.

Describe procedures for administering, publicizing, and enforcing the code of conduct, including how the institution monitors for and addresses conflicts of interest. If another office is responsible for the code of conduct, you may want to cross-reference that office's policies and procedures.

Also include procedures explaining how and to whom institutional employees and officers are to

report expenses provided for or paid by a private education loan lender or group of lenders for activities associated with these entities.

Response:

Further details about the MCCD employment policies and procedures can be found on the Human Resources website.

2.3 Frequent Contact Information

Provide titles, job descriptions, telephone numbers, and email addresses of all employees elsewhere in the school with whom financial aid office staff members have frequent contact regarding the administration of the Title IV aid programs. You might also want to provide the same information (e.g., financial aid employee titles, job descriptions, email addresses, telephone numbers, etc.) to other school offices.

Resources:

668.16(b)(3)
668.16(b)(4)

Response:

The financial aid office at the MCCD plays a crucial role in supporting students by providing access to federal, state, and institutional financial aid programs. In partnership with other departments across campus, such as admissions, student fees, and the registrar's office, the financial aid office ensures that students receive the resources necessary to fund their education. These collaborations are essential for the seamless processing of financial aid applications, disbursement of funds, and overall student support. To maintain efficient operations, the financial aid office works closely with various campus units, including information technology services, to ensure the proper functioning of financial aid systems. Below is an overview of the key departments, their roles, and contact information, helping ensure effective communication and coordination for the benefit of MCCD students.

Student Fees Office:
General Description: The student fees office handles student billing, payments, fee waivers, tuition installment plans, and disburses financial aid refunds.

Contact Information:

Merced College Campus: Lesher Building, Third Floor

Phone: 209.384.6210

Email: studentfees_custsvc@mccd.edu

Los Banos Campus: Student Services Building, Room LB-A145, Mailstop 53

Phone: 209.386.6752

Email: studentfees_custsvc@mccd.edu

Business and Fiscal Services:
General Description: Oversees accounting, budgeting, payroll, and financial reporting for the university and its auxiliaries.

Contact Information:

Location: Administration Building, 3600 M Street, Mail Stop 09

Phone: 209.384.6267

Business & Fiscal Servicesis handled through the website.

Educational Opportunity Program (EOP)
General Description: EOP supports first-generation, low-income, and historically underrepresented students through academic advising, counseling, and resources.

Contact Information:

Location: Mailstop 10

Phone: 209.381.6596

Email: eopsfrontdesk@mccd.edu

Admissions and Records:
General Description: Manages the admission process for prospective students, including application review and recruitment efforts and the evaluation of transcripts and enrollment verification.

Contact Information:

Merced College Campus: Lesher Student Services Building, 2nd Floor, 3600 M Street

Phone: 209.384.6187

Email: admissions@mccd.edu

Los Banos Campus: Student Services Building, 22240 Highway 152

Phone: 209.826.3495

Email: admissions@mccd.edu

Information Technology Services:
General Description: Provides IT support for campus systems, including student information systems and financial aid platforms.

Contact Information:

Technology Support is handled through the website.

2.3.1 Third-Party Servicers

Note: ED published guidance which provided additional information on what may be considered functions of a third-party servicer in the administration of Title IV aid in GEN-23-03 which included a prohibition on contracting with foreign or foreign-owned third-party servicers. GEN-23-08 rescinded the prohibition and removed the implementation date of September 1, 2023. GEN-23-08 also rescinded the guidance in GEN-16-15 and the March 8, 2017, Electronic Announcement, *Updated Third-Party Servicer Questions and Answers* prohibiting contracts between colleges and foreign-owned or operated servicers. Further guidance will be provided by ED in the future. Schools should continue to identify contractors and functions that may fall under the third-party servicer guidance in the interim.

Policies

If your institution contracts with a third-party servicer to administer any aspect of the institution's participation in any Title IV program, state your institution's policies for entering third-party servicer contracts. Identify who has the authority to authorize the use of third-party servicers.

Your school's policy should prohibit entering a contract with third-party servicers, including organizations, agencies, or individuals, who employ individuals who:

- Have been convicted of, plead nolo contendere, or found guilty of a crime pertaining funds from federal, state, or local government sources;
- Have been either administratively or judicially determined to have committed fraud pertaining funds from federal, state, or local government sources;
- Owes a liability for violation of requirements for Title IV or HEA program funds and is not making either payments according to the repayment agreement of the liability; or
- Have experience at a school that incurred a Federal fund loss in excess of five percent of the school's annual Title IV program funds (for schools with a ten-percent or higher equity owner).

Response:

The MCCD recognizes the importance of efficient and effective financial aid administration to support its students. In certain instances, the financial aid office may enter into contracts with third-party servicers to enhance the delivery of financial aid services. This policy will be subject to periodic

Resources:

668.2(b), Third-party servicer
GEN-23-08
668.25
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024
GEN-15-01
GEN-12-08
668.14(b)(18)(ii)

review and revision as needed to ensure alignment with the goals and objectives of the MCCD and changes in relevant laws or regulations. The vice president of administrative services has the authority to authorize and approve all third-party contracts.

Procedures

Cross-reference all third-party contracts, if any, to administer any aspect of the institution's participation in the Title IV programs. For each contract, identify and list the contact information of all third-party servicer personnel assigned to the institution under the contract. Also identify the institutional employee(s) responsible for monitoring the work performed by the third-party servicer and addressing any problems with the work performed.

Response:

The MCCD has the following third-party servicer contracts:

Servicer Name	Contract Signer	Services Offered
Ellucian	Dawn Brajkovich	Verification Document Completion and Upload
National Student Clearinghouse (NSC)	Sean McTighe	Enrollment Reporting
BankMobile Disbursements	Katherine Kenne	Credit Refunds
Blue Icon Advisors, LLC	Mindy Kaplan Eline, Executive Director	Policies & Procedures Development

Resources:

2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024

2.4 General Financial Aid Office Administration

Provide a description of routine office operations. This should include but is not limited to:

- Office hours and services (e.g., extended hours for nontraditional students)
- Calendar of financial aid activities (weekly, monthly, etc.)
- Staff meetings

Response:

Financial Aid Office:

General Description: The financial aid office administers federal, state, and institutional aid programs, ensuring compliance with Title IV and California state regulations and supporting students in financing their education.

Contact Information:

Merced College Campus: Lesher Student Services Building, 3rd Floor, Room 312

Phone: 209.384.6031

Hours of operation: Monday - Friday, 8:00 a.m. to 5:00 p.m.

Los Banos Campus: 22240 Highway 152, Building A, Los Banos, CA 93635

Phone: 209.826.3495

Hours of operation:?

- Monday: 8:00 a.m. - 2:45 p.m.
- Tuesday-Friday: 8:00 a.m. - 5:00 p.m.*

* Thursday closed 12:00 p.m. - 2:00 p.m. Friday closed 1:00 p.m. - 2:00 p.m.

Email: financial.aid@csuci.edu

All important dates and deadlines are listed on the financial aid website.

2.4.1 Accommodations for Disabilities

Ensuring an Inclusive and Accessible Website

It is vital that the guidance for financial aid office forms should also apply to language you develop for your aid office's website.

It is important to ensure that students with disabilities have the same access as nondisabled students. For example, when developing content on your website, you should be mindful of students using screen readers and other devices. Many institutions have web accessibility initiatives on their campuses to ensure accessibility. Check what resources your institution has available to assist in your efforts.

Find more information on best practices for addressing implicit bias in NASFAA's *Implicit Bias Toolkit.*

Policies

Provide a description of the accommodations the school provides for students with disabilities, including compliance with the ADA.

Response:

Disabled Students Program and Services (DSPS):

The MCCD educational experience is accessible to every student. The staff embraces the diversity that each student brings to the MCCD and through their support, students can develop the academic ability, confidence, and self-advocacy necessary for success.

DSPS is committed to providing equal access to educational opportunities for students with disabilities. Disabled Student Programs & Services provides reasonable accommodations to students with verifiable disabilities who are enrolled in classes at Merced College. Reasonable accommodations include test-taking assistance, assistive computer technology, sign language interpreters, classroom material in an alternate format, and learning disability assessment.

Procedures

Describe how the financial aid office meets the special needs of students with disabilities and complies with ADA requirements.

Response:

The financial aid office complies with Section 504 and Accommodations for Disabilities (ADA). Staff will provide accommodation as needed by a request from a student and may seek support from the DSPS office to meet the needs of students.

Resources:

28 CFR 35
28 CFR 36
34 CFR 104
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024

2.4.2 Staff Customer Service Interactions

Best Practices for Avoiding Implicit Bias in Communication

As there are many ways to communicate with students, the challenge becomes how to effectively manage communications and manage expectations when communicating with students. The purpose of this policy is to provide clarity to the student experience and promote student engagement.

Some benefits of ongoing and effective communication are:

- Building trust;
- Preventing or resolving problems;
- Creating better relationships;
- Providing clarity and direction;
- Increasing engagement;
- Improving productivity; and
- Promoting team building.

Any communications sent to the student body should align with the college or university's values and mission statement. Communications should be student-focused, consistent, and relevant to the topics which will enhance the student experience. Communications to students should be through institution-approved avenues (email, phone, text, social media, etc.). It is recommended that a student-focused team be charged with all communication to ensure consistency and a communication calendar be developed. Communications should provide clarity and be consistent with any change that impacts the student body.

Professionalism in Communication


In all communications, staff are reminded of their responsibility to serve the interests of the institution and always ensure appropriate content. Staff should ensure appropriate response times are adhered to when communicating with students. A fair judgement should be made regarding the nature of the issue at hand, however all communication requiring a response should be acted on within five working days. During absence or when staff will not be able to respond in a reasonable time, staff should provide an autoreply to their emails with details of an alternative contact.

Complaints

Students should be provided with clear instructions of how and where to submit complaints/grievances and provided a timeline for a response or resolution.

Policies

The school's policies should clearly state the communication methods, e.g., in-person, phone, email, or virtual, used to relay financial aid information to the student. Also indicate the conditions under which a student my be better served using an individual appointment with a staff member in the financial aid office.

Response:

The financial aid office exercises all methods of communication while interacting with students, depending upon the needs of the student. These methods include in person, phone, email, or virtual appointments. The MCCD utilizes a phone tree where all incoming calls rotate to the next available staff person, which helps to prevent a student's call from going to voicemail. Calls are monitored by the DFA to ensure good customer service is being offered and that all information relayed to students is accurate.

Procedures

Include information about customer service interaction, both in-person and virtually, who schedules appointments, and how the school ensures students are scheduled to see appropriate staff members (e.g., students scheduled with staff based on last name, student ID, or some other identifier).

Response:

The financial aid office has a front counter to handle all walk-ins, which is staffed on a rotation basis. Students check in at a kiosk and are called forward for service. The financial aid lab also handles students on a walk-in basis, and financial aid staff are available if needed to support students in the lab. Student appointments are scheduled for special circumstances related to a professional judgment request or a dependency override. Students can also schedule online virtual appointments. Every Friday, the majority of the financial aid staff work remotely from home, and a few staff work out of the learning resource center.

On an ongoing basis, surveys are conducted with the students to determine if any areas of customer service need to be improved upon. The financial aid staff regularly participate in customer service training. In the event a student needs to be escalated due to a situation beyond the financial aid staff's expertise, the DFA will be called upon to handle that type of situation.

Resources:

668.16(h)

2.4.3 Treatment of Correspondence/Forms


When evaluating your institution's processes, it is important to do so from top to bottom, including an evaluation of your office's forms. As aid professionals we must remember that many of the policies and concepts that are part of our day-to-day procedures are new to our students and their families.

Some federal requirements may appear to students as biased, such as verification to low-income students . It is the role of the aid office to help explain these requirements to the best of our ability and assist students in resolving these eligibility requirements.

Using Inclusive Language

 All external communications should be written in a way that everyone can understand.

Inclusive language should acknowledge diversity and be sensitive to the differences between us. Inclusive language will help your messaging resonate with a larger audience and ensure your students feel a part of the community.

Make sure that the language you are using is inclusive and does not turn potential students off or make them feel as though they are not what the institution is looking for.

• Only request data that is necessary to meet a form's intended purpose. Evaluate each data element to ensure it is essential to completing/resolving the task or issue to which it is related.

• Be precise and use clear and plain language. Neurodiverse students often struggle to answer questions or follow instructions that can be interpreted in a variety of ways or depend upon social assumptions. When using acronyms be sure to explain what they represent.

• Use chosen or preferred name whenever possible.

• Be sure to use gender-neutral pronouns. When providing examples, use "they" or "their" in an effort to not alienate individuals. This will also help ensure you are not making assumptions about the student's or parent(s)'s gender identities.

• Offer assistance on your forms and include your office's contact information. Create an environment that is not only accommodating to students but is openly welcoming to questions.

• If your office has the ability, ask a student for their preferred pronouns, and make a notation in your system for future reference.

• If your forms are primarily web-based/online, be sure you make it known that an alternative paper version is readily available as well.

• Be careful not to make assumptions about familial relationships. For example, use "parent(s)" instead of "parents" and be mindful that extended family may be part of the household.

• Use "parent 1" and "parent 2" instead of "mother" and "father."

• Use person-first language. When using descriptive language, put the person before the condition or situation. For example, use "person who is disabled" and "a person experiencing homelessness."

Policies

Describe all categories of correspondence and forms (paper and electronic) received and used by the financial aid office. You may want to cross-reference the forms and document collection and tracking sections of the manual.

Response:

MCCD uses the Student Forms platform provided by the Ellucian Company to collect required documents needed to complete verification. Students create an account in Student Forms and upload their documents directly into their portal account.

For all other forms, MCCD has a list of forms on their website for students to complete. These forms can be completed by the student electronically. Once submitted, the financial aid office will receive a notification.

Procedures

Provide step-by-step procedures for handling correspondence and forms, including:

- Who receives, distributes, and responds to routine correspondence
- Use of form letters
- Use of electronic services (e.g., email communications, online student access and submission using electronic signatures, etc.)

Resources:

GEN-01-06
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024

- Responsibility for outgoing mail, email, etc.

Provide step-by-step procedures for distribution of financial aid information, applications, and forms, including who is responsible for them and where they are stored, etc.

Response:

For verification documents, the students are sent a communication advising them how to sign into the Student Forms platform to create an account and upload their verification documents.

For other types of forms or communications, the FAT checks the mailroom and distributes correspondence depending on the type. The FAA monitors the financial aid email correspondence and will answer directly or forward to the appropriate persons. For forms completed electronically from the forms link on the website, the financial aid office will receive a notification that the FAAs monitor.

Forms and correspondence received from students are uploaded into the student's file. If a document is not needed, the financial aid staff will securely shred the document.

The FAT will submit periodic correspondence to outside agencies, such as overpayment letters related to Return to Title IV (R2T4), scholarships, or outside housing agencies. The financial aid director will submit statements on college letterhead, depending upon the nature of the correspondence.

2.4.4 Incoming Electronic Communications

Policies

Describe the routing of incoming communication, e.g., telephone calls, virtual calls, or emails, in the financial aid office.

Response:

See Section 2.4.3 Treatment of Correspondence/Forms

Procedures

Indicate who is responsible for incoming communications, when these communications are referred to professional staff, and how to determine which staff receives the referral (e.g., a list of topics or frequently asked questions and the persons designated to handle each specific topic/question).

Response:

See Section 2.4.3 Treatment of Correspondence/Forms

2.4.5 Confidentiality of Student Records

Policies

Describe the school's Family Educational Rights and Privacy Act (FERPA) and Gramm-Leach-Bliley Act (GLBA) policies as they relate to routine financial aid office operations. You might want to cross-reference section 2.6 (Information Sharing and the Family Educational Rights and Privacy Act). For GLBA, you may wish to cross-reference bursar or accounting office policies and procedures and include such information as:

•The individual(s) designated to coordinate and implement the institution's information security program.

•Risk assessment which addresses three required areas:

♦Employee training and management;

♦Information systems, which may include network and software design, processing of information, data storage, transmission and disposal;

♦Detection, prevention, and response to attacks, intrusions, or other possible systems failures;

• Oversight of service providers. Please note, ED nor Federal Student Aid are considered service providers for institutions. See GENERAL-24-46.

Resources:

16 CFR 313.3(n)
16 CFR 314
GEN-16-12
16 CFR 314.4
16 CFR 314.5
34 CFR 99
GEN-15-18
Electronic Announcement, 4/24/24 (GENERAL-24-46)
Electronic Announcement, 2/9/23 (GENERAL-23-09)
Electronic Announcement, 9/5/17
Electronic Announcement, 2/28/20
FTC Safeguards Rule
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024

•Evaluation and adjustment of information security program as needed with the results of testing

•Incident response plan to respond and recover from any security event which may affect the confidentiality, integrity, or availability of customer information

•Documentation of the safeguards in place for each risk identified.

Response:

The Family Educational Rights and Privacy Act (FERPA): This is a federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education (ED). FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level.

Gramm-Leach-Bliley Act: The Gramm-Leach-Bliley Act (GLBA), enacted in 1999, mandates that financial institutions, including higher education institutions, protect the privacy and security of customer information. The GLBA comprises three main components: the Financial Privacy Rule, the Safeguards Rule, and the Pretexting Provisions. These rules require institutions to explain their information-sharing practices, develop a comprehensive information security program, and protect against unauthorized access to sensitive data.

How GLBA Relates to MCCD: As a higher education institution, MCCD collects, stores, and processes a significant amount of personally identifiable information (PII) and nonpublic personal information (NPI) related to students and employees. Compliance with the GLBA ensures that MCCD maintains the confidentiality, integrity, and availability of this sensitive information.

Which GLBA Provisions Apply and Do Not Apply to MCCD: The GLBA provisions that apply to MCCD include the Safeguards Rule, which requires the implementation of an information security program, and the Financial Privacy Rule, which mandates transparency in information-sharing practices.4 The Pretexting Provisions, which protect against social engineering attacks, also apply. However, certain financial-specific provisions may not be directly applicable to MCCD.

Security Plan: Overview: MCCD's Information Security Plan is designed to meet the requirements of the GLBA and protect sensitive information from unauthorized access, use, or disclosure. The plan includes specific measures and protocols to ensure compliance and enhance the overall security posture of the institution.

Qualified Individual: The chief Information security officer is designated as the qualified individual responsible for overseeing, implementing, and enforcing the information security program.

Reporting: The chief information security officer will submit a written report to the board of trustees at least annually each fiscal year. This report will detail the status of the information security program, identified risks, and mitigation efforts.

Risk Assessment: Each department within information technology will conduct a written risk assessment, with assistance from information security, twice a year. These risks will be evaluated and compiled into a final risk assessment for the district as a whole. The final risk assessment will include:

How MCCD will categorize and evaluate risks it faces: The criteria for assessing the confidentiality, integrity, and availability of customer information in information systems

The adequacy of existing controls as they relate to the risks identified:

- How identified risks will be mitigated or accepted based on the risk assessment.
- How the information security program will address the risks.

The risk assessment will cover risks related to:

- Customer, student, or employee, PII or NPI.
- Information systems, including software and hardware used in the storage, access, and transmission of sensitive information.
- Employee behavior and security awareness, with additional emphasis on those encountering sensitive information.
- Any in-house developed code.

Monitoring and Testing: Information security will run a penetration test at least annually using either in-house staff or by contracting with a third-party cybersecurity vendor. Additionally, comprehensive vulnerability assessments will be conducted at least twice a year and after any significant changes in any system.

Safeguards and Controls:

The information security program will undergo review and adjustment at least once every fiscal year based on information gathered during risk assessments, emerging threats, or industry best practices to:

- Authenticate and permit access only to authorized users.
- Prevent unauthorized access or dissemination of staff or student information.
- Limit user access to staff or student information following the Principle of Least Privilege.
- Identify and manage the data, personnel, devices, systems, and facilities considered "mission critical."
- Encrypt all customer information at rest and in transit, except where infeasible.

NOTE: Where encryption is deemed infeasible, the chief information security officer must approve adequate compensating controls:

- Adopt and update secure development practices for in-house developed applications that interact with or store staff or student information.
- Implement multi-factor authentication for any individual accessing any information system.
- Ensure staff and student data is retained for the minimum period required by law.
- Develop, implement, and maintain procedures for the secure disposal of information that is past its retention period. For financial information protected under GLBA, this is a period of no more than two years after the last transaction involving this data.
- Improve or update the district's change management processes.
- Adopt or improve policies, procedures, and controls to monitor and log the activity of authorized users and detect unauthorized access or modification of staff or student data by such users.

Procedures

Describe what types of information may be released, as well as to whom and how it may be released (e.g., by telephone, email, in-person, etc.) and the procedures to ensure record confidentiality as it relates to student workers (e.g., signing a confidentiality statement). You will want to cross-reference section 2.6.1 (Internal Disclosures) and any 2.6 subsections as applicable.

Response:

The Family Educational Rights and Privacy Act (FERPA):

All student records of MCCD are kept in accordance with the provisions of the FERPA regulation of 1974. Students may request access to academic records which personally identify the student. The student may challenge the accuracy of the record or the appropriateness of its retention. Student consent is needed for the release of records covered by the Act to outside parties (i.e., other schools, prospective employers) except for those agencies entitled to access under the provisions of the Act (i.e., campus officials, federal educational and auditing officers). These provisions apply to records received and used after November 19, 1974.

Under FERPA, education records are defined as records that are directly related to a student and are maintained by an education agency or institution or by a party acting for the agency or institution. Education records can exist in any medium, including typed, computer generated, videotape, audiotape, film, microfilm, microfiche, and email, among others.

Education records do not include such things as:

- Sole possession records, i.e., records/notes in sole possession of the maker, used only as a personal memory aid and not revealed or accessible to any other person except a temporary substitute for the maker of the record (this might include notes an instructor makes while providing career/professional guidance to a student);

- Medical treatment records that include but are not limited to records maintained by physicians, psychiatrists, and psychologists;
- Employment records when employment is not contingent on being a student, provided the record is used only in relation to the individual's employment;
- Records created and maintained by a law enforcement unit used only for that purpose, are revealed only to law enforcement agencies of the same jurisdiction, and the enforcement unit does not have access to education records;
- Post-attendance records, i.e., information about a person that was obtained when the person was no longer a student (alumni records) and does not relate to the person as a student.

According to FERPA, personally identifiable information (PII) in an education record may not be released without prior written consent from the student. Some examples of information that may not be released without prior written consent of the student are:

- Birth date,
- Religious affiliation,
- Citizenship,
- Disciplinary status,
- Ethnicity,
- Gender,
- Grade point average (GPA),
- Marital status,
- SSN/student I.D.,
- Grades/exam scores, and
- Test scores (e.g., SAT, GRE, etc.)

Copies of the full text of the FERPA policy are available in the admissions and records office. Questions with respect to a student's prerogative under the FERPA should be directed to the Registrar.

Gramm-Leach-Bliley Act (GLBA):

- All permanent, temporary, and contract staff must undergo information security awareness training at least every fiscal year.
- Users with access to sensitive data will undergo additional training for handling confidential information at least once every fiscal year.
- Users with administrative access to any system will complete specialized cybersecurity training at least once every fiscal year.
- At the discretion of the chief information security officer, additional training may be required for information security department personnel and for certain information technology personnel involved in managing the information security program.
- Information security/cybersecurity training will be required before access to related systems/functions is granted.

Incident Response: The chief information security officer is responsible for maintaining and updating the district's Incident Response Plan. This plan includes actions to be taken during and after an incident, and procedures to follow should an incident require notifying the Federal Trade Commission.

Service Providers and Contracts: All vendors with access to MCCD systems will undergo a risk assessment to determine their risk level before formal selection. Vendors will undergo reevaluation at renewal to monitor changes in risk levels. MCCD will ensure that contracts with covered vendors include provisions sufficiently covering data security.

Evaluation and Revision of the Information Security Program: The vice chancellor

of information technology and institutional research and the chief information security officer will review the district's information security staffing and knowledge levels, along with current cybersecurity trends, on an annual basis and adjust as necessary. By adhering to these guidelines, MCCD demonstrates its commitment to protecting sensitive information and maintaining compliance with GLBA.

2.5 Records Management and Retention

Policies

List all offices involved in Title IV records management and retention. Describe each office's responsibilities. For example, a school may have a Federal Perkins Loan office that maintains all promissory notes. Characterize how this office interacts with the financial aid office in the management and retention of these records. Include information regarding record retention timeframes and the disposition of records after the expiration of the record retention timeframe.

Resources:

668.14(b)(4)
674.19(e)
675.19(b)
676.19(b)
682.610(b)
685.309(c)
686.38
690.82(a)
2024-25 FSA Handbook, Vol. 6, Ch. 1, June 2024
668.24
2024-25 FSA Handbook, Vol. 6, Ch. 3, June 2024
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024

Response:

Records related to school eligibility: The MCCD must establish and maintain on a current basis any application the school submitted for FSA program funds. Other program records that must be maintained include:

- Program Participation Agreement (PPA), approval letter, and Eligibility and Certification Approval Report (ECAR).
- Application portion of the FISAP.
- Accrediting and licensing agency reviews, approvals, and reports.
- State agency reports, audits, and program review reports.
- Self-evaluation reports.
- Other records, as specified in regulation, pertain to financial responsibility and standards of administrative capability.

Records relating to student eligibility: The MCCD must keep records that substantiate the eligibility of students for FSA funds, such as:

- Cost of attendance information.
- Documentation of a student's satisfactory academic progress (SAP).
- Documentation of the student's program of study and the courses in which the student was enrolled.
- Data used to establish student admission, enrollment status, and period of enrollment.
- Required student certification statements and supporting documentation.
- Documents used to verify applicant data and resolve conflicting information.
- Documentation of all professional judgment decisions.
- Financial aid history information for transfer students.

Records for Title IV aid recipients: The MCCD must maintain records for each Title IV recipient that include but are not limited to:

- The FAFSA Submission Summary (FSS) or Institutional Student Information Record (ISIR) used to determine a student's eligibility for FSA program funds,
- Application data submitted to the Department of Education (ED), lender, or guaranty agency by the school on behalf of the student.
- Documentation of each student's borrower's eligibility for Title IV, HEA program funds (e.g., records that demonstrate that the student has a high school diploma, GED, or the ability to benefit),
- Documentation relating to each student's borrower's receipt of Title IV, HEA program funds, including but not limited to:
  - The amount of the grant, loan, or FWS award; its payment period; its loan period, if appropriate;

and the calculations used to determine the amount of grant, loan, or FWS award.

- The date and amount of each disbursement of grant or loan funds, and the date and amount of each payment of FWS wages.
- The amount, date, and basis of the school's calculation of any refunds/returns or overpayments due to or on behalf of the student, or the treatment of Title IV, HEA program funds when a student withdraws.
- The payment of any overpayment or return of Title IV, HEA program funds to ED.

- Documentation of information collected at any initial or loan exit counseling required by applicable program regulations.
- Reports and forms used by the school in its participation in a Title IV, HEA program, and any records needed to verify data that appear in those reports and forms.
- Documentation supporting the school's calculation of its completion or graduation rates, and transfer-out rates.

Fiscal records: The MCCD must keep fiscal records to demonstrate its proper use of FSA funds. A school's fiscal records must provide a clear audit trail that shows that funds were received, managed, disbursed, and returned in accordance with federal requirements. The fiscal records a school must maintain include but are not limited to the following:

- Records of all FSA program transactions.
- Bank statements for all accounts containing FSA funds,
- Records of student accounts, including each student's institutional charges, cash payments, FSA payments, cash disbursements, re- funds, returns, and overpayments required for each enrollment period.
- General ledger (control accounts) and related subsidiary ledgers that identify each FSA program transaction (FSA transactions must be separate from school's other financial transactions).
- Federal Work-Study payroll records.
- The fiscal operations report portion of the FISAP.

The MCCD must also maintain records that support data appearing on required reports, such as:

- Pell Grant statements of accounts.
- Cash requests and quarterly or monthly reports from the G5 payment system.
- FSA program reconciliation reports.
- Audit reports and school responses.
- State grant and scholarship award rosters and reports.
- Accrediting and licensing agency reports.
- Records used to prepare the income grid on the FISAP.

Loan program records: There are special record keeping requirements in the Direct and FFEL loan programs. The MCCD must maintain:

- A copy of the paper or electronic loan certification or origination record, including the loan amount and the period of enrollment.
- The cost of attendance, estimated financial assistance, and expected family contribution used to calculate the loan amount (and any other information that may be required to determine the borrower's eligibility, such as the student's Federal Pell Grant eligibility or ineligibility).
- The dates that the school disbursed the loan funds to the student, and the amounts disbursed.
- Documentation of the confirmation process for each academic year in which the school uses the multi-year feature of the Master Promissory Note (MPN). This may be part of the borrower's file, but acceptable documentation can also include a statement of the confirmation process that was

printed in a student's handbook or other financial aid publication for that school year. The documentation may be kept in paper or electronic form. There is no retention limit for this documentation; you must keep it indefinitely because it may affect the enforceability of loans.

The MCCD must keep records relating to a student's borrower's eligibility and participation in the Federal Family Education Loan (FFEL) or Direct Loan (DL) program for three years after the end of the award year in which the student last attended the school. A school must keep all other records relating to the school's participation in the FFEL or DL program for at least three years after the end of the award year in which the records are submitted.

Campus-Based records: The MCCD participates in the Federal Supplemental Educational Opportunity Grant (FSEOG) and must keep the FISAP and any records supporting the data used to create it (e.g., the source data for the income grid) for three years from the end of the award year in which the FISAP is submitted.

Record Retention Periods: The MCCD must retain all required records for a minimum of three years from the end of the award year. However, the starting point for the three-year period is not the same for all records. For example, FFEL or DL reports must be kept for three years after the end of the award year in which they were submitted, while borrower records must be kept for three years from the end of the award year in which the student last attended.

Location: The MCCD must make its records readily available to ED at a location of the school designated by the ED. These include any records of transactions between the school and the financial institution where it deposits FSA funds. A school is not required to maintain records in any specific location. For example, it may be more appropriate for a school to maintain some records in the financial aid office while maintaining others in the student fees office, the admissions office, or the office of the registrar. The responsible administrator in the office maintaining the records should be aware of all applicable record retention requirements.

Resources:

668.24(d)
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024
668.24(f)

Procedures

Describe how the school maintains and complies with all Title IV record retention requirements. Include information such as:

- A description of the school's recordkeeping systems (e.g., imaging system, paper folders, etc.)
- An explanation of any automated procedures
- The treatment and maintenance of:
  - Active records
  - Inactive records
  - Hard copy records
  - Electronic records
  - Microfilmed records
  - Records on CDs, discs, tapes, or other media
- The access and availability of records for inspection by auditors, reviewers, etc.
- Disposition of records after the expiration of the record retention time frame

If you used the subsection format (e.g., 2.5.1, 2.5.2, etc.), the financial aid office procedures would be detailed under subsection 2.5.1, and so on. For procedures of other offices, you could cross-reference those offices' policies and procedures and include provisions for interoffice communications.

Response:

Most recent records are stored electronically on a shared drive. For records in a paper format from previous years, those are stored in a locked storage area in the facilities office. The MCCD retains all required records for a minimum of three years from the end of the award year. However, the starting point for the three-year period is not the same for all records. For example, FFEL or DL reports are kept for three years after the end of the award year in which they were submitted, while borrower records are kept for three years from the end of the award year in which the student last attended.

Destruction of Records: The board of trustees shall order the destruction of records by a method that assures the record is permanently destroyed, e.g., shredding burning, and pulping. The superintendent/president or designee shall supervise the classification and destruction ofwithecords and electronically stored information (ESI). The district must preserve ESI that is relevant to actual or potential litigation pursuant to the Federal Rules of Civil Procedure. The district shall comply wi the Federal Rules of Civil Procedure and produce relevant ESI in the form in which it is ordinarily maintained or readily usable. An annual report shall be made to the Board of Trustees regarding the classification and destruction of records and ESI.

2.5.1 Safeguarding Electronic Records

Policies

Describe the school's policies as they relate to maintaining and safeguarding electronic records.

Response:

Unless otherwise designated by the superintendent/president, the vice president of information technology services is the information security officer (ISO) for the district. Technology managers are management-level employees reporting to the ISO or the vice president of information technology services who are tasked with overseeing the various aspects of the district's information systems. Authorized ITS staff are employees or contractors designated by the ISO or by the vice president of information technology services to manage or maintain the district's information systems, or to carry out other tasks relevant to information security, and who are acting within the scope of their defined job responsibilities or under the direction of one of the district's technology managers. The Information system should be broadly construed to mean any computer, network, or associated equipment, including, but not limited to, printers, removable media, and peripheral devices.

For the purposes of this administrative policy, the district's information systems include those owned or controlled by the district even if they are not physically present on campus. This includes any systems that are hosted off campus or managed by another organization or company on the district's behalf. When referring to the district's information systems, "security" will mean the integrity and availability of network and computing devices, and the confidentiality of any information stored on district computer systems or electronic media or transmitted over the network.

An attack occurs when a person intentionally attempts to violate the security of a district computer system. This definition includes any such attempt whether it is carried out locally (with physical access to a district computer system) or remotely (over a computer or telephone network). This definition also includes any attack conducted by means of an automated program, such as a virus or worm, which does require continued action by the attacker. A breach occurs when a person violates the security of the district's computer or information systems without authorization.

Procedures

Describe how the school monitors and updates electronic functions such as password protection, password changes at set intervals, access revocation for unsuccessful logins, user identification and entry point tracking, random audit surveys with supervisors, and security tests of the coded access systems.

Response:

Roles and Responsibilities of the ISO: The ISO for the district is responsible for maintaining and enforcing this administrative procedure. The ISO is responsible for overseeing the development and deployment of information security standards and procedures throughout the district.

Roles and Responsibilities (All Users): The security of the district's information systems is the shared responsibility of all users (staff and students). Users should attempt to adhere to this administrative procedure and any standards or procedures defined in accordance with this administrative procedure. Employees and contractors should report any breach or attempted breach of security to their immediate supervisor, to the ISO, or to other campus staff members as designated by the ISO. Students and other users should report any breach or attempted breach to any of the district's technology staff, or, in the alternative, to any staff member. Employees and contractors should not attempt to breach the district's security measures except as part of an authorized security test or audit in accordance with the security auditing and testing procedures defined according to this administrative procedure. All other users, including, but not limited to, students and guests, should not attempt to breach the security of the district's information systems under any circumstances.

Resources:

16 CFR 314.4
16 CFR 314.5
FTC Safeguards Rule
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024

Security Standards: To ensure the security of the district's computer and information systems, the ISO will oversee the development of applicable security standards for all computer workstations, servers, network devices, and other devices or peripherals. The standards will define best practices intended to reduce the chance of a security breach. The ISO will also oversee the development of standards and procedures governing portable devices and removable storage devices. These standards should ensure that sensitive or personal information stored on these devices will not be compromised if the device is lost or stolen. The ISO will also oversee the development and execution of procedures to implement the defined security standards, to respond to and recover from a breach of security, and to audit or test the security of the district's computer and information systems. All security standards and procedures must be approved by the technology and research master planning committee.

Auditing and Testing: For the purposes of this administrative procedure, auditing is the process of verifying that the district's computer and information systems are configured and deployed according to the defined security standards and that the district's staff follows any defined security procedures and best practices. For the purposes of this administrative procedure, testing is the process of analyzing the district's computer and information systems from an offensive perspective. Such testing could include scanning, probing, or attacking, the district's computer systems from the Internet, or from a campus network. The ISO will oversee the development of auditing and testing procedures to ensure the security of the district's information systems. The ISO will ensure that the district's technology staff, or a designated entity, audit the district's computer and information systems on a periodic basis. Such auditing may, at the discretion of the ISO or as defined in the procedures developed according to this administrative procedure, be confined to a subset of the district's total information systems in order to reduce the time and resources required.

The ISO will ensure that the district's technology staff, or a designated entity, test the security of the district's information systems on a periodic basis. Because such testing has the potential to adversely impact the use of the district's information systems, the ISO will ensure that appropriate measures are taken to limit any adverse impact. Such measures may include restrictions on the types of testing to be done or when and how such testing will be carried out. Such testing may, at the discretion of the ISO or as defined in the procedures developed according to this administrative procedure, be confined to a subset of the district's information systems in order to reduce the time and resources required.

Privacy and Monitoring: All users of the district's information systems should respect the privacy of all other users as guided by this administrative procedure and Acceptable Use Policy and Administrative Procedure 3720. The district has an obligation to comply with any applicable laws or regulations regarding identity theft and the electronic exchange of copyrighted material. The privacy provisions of this policy are not intended to prevent the district from taking any actions that are necessary to meet such legal requirements. For the purposes of privacy and monitoring, any activity which must be authorized by the ISO may, in his or her absence, be authorized by another district vice president designated by the ISO or designated by the superintendent/president.

Standard ITS Practices: The district reserves the right to monitor its computer networks to maintain security and to gather usage information. Monitoring will be undertaken routinely by authorized ITS staff in the normal course of their duties to maintain technical security and operational efficiency of a system or service. Such monitoring may include the use of intrusion detection systems which are able to monitor computers and networks for signs of a security breach or attack.

The district may use software to detect, prevent, or remove spam, fraud, phishing, viruses, and spyware or other malicious software. The district may deploy such software on servers and individual workstations. The software may be used to detect and/or block spam, phishing, fraud, viruses, and spyware or other malicious software email to and from individual email accounts. The district may also configure software on individual workstations to log non-personal information relevant to the security or operation of the application, systems, or service. Any extraordinary action taken to monitor the district's network or information services must be authorized by the ISO or another manager designated by the ISO in accordance with this and other district policies and in accordance with applicable law.

Students and Guests: If the authorized ITS staff, or other employees acting in a related role, suspect that a student or other non-employee has violated this policy or any other policy regarding the district's information systems, the authorized ITS staff may prevent that person from using the district's information systems on a temporary basis. If any adverse action is taken, or the staff

feels that further action is needed, the matter should be referred to the appropriate dean or vice president.

Staff and Faculty: The provisions of this policy are not intended to supersede or revise any existing policies or collective bargaining agreements with regard to employee discipline.

In order to ensure the security and integrity of the district's information systems, investigation and monitoring of the district's information systems may occur in response to any suspected attack against the district's information systems. Such investigation and monitoring will be performed at the discretion of the ISO in accordance with district policy and any applicable laws. When investigating an attack, there is no presumption that the person to whom a workstation or account is assigned is necessarily the person responsible for an attack.

If, at any point, in the estimation of the authorized ITS staff, the attack in question appears to have been carried out or facilitated by a district staff member, the authorized ITS staff may temporarily deny that staff member access to the district's information systems pending further instructions from the ISO or human resources. The authorized ITS staff may continue to investigate the scope of the attack and to limit any resulting damage. Any disciplinary investigation should be conducted by Human Resources in accordance with the district's policies, including policies regarding employee discipline or termination, as well as with any collective bargaining, agreements and with any applicable laws or regulations.

If the authorized ITS staff have determined that an individual workstation was used in an attack, or that an attack passed through the workstation, but that the employee to whom the machine was assigned did not participate in or have knowledge of the attack, then the authorized ITS staff should keep the employee informed of any investigative activities that may affect him or her. The employee's privacy should be respected at all times. Any suspected violations of district policy, including this administrative procedure and the Acceptable Use Policy and Administrative Procedure 3720, should be turned over to human resources for further action. The authorized ITS staff may take any necessary steps to protect the district's information systems including denying access to those systems by users suspected to have violated the district's policies. Electronic data, information and material created or copied by authorized ITS staff will be treated confidential during monitoring and investigation, and all collected data will be destroyed if determined not relevant. Access to such information will be strictly on a need-to-know basis for technical or administrative purposes.

Backup storage: In accordance with the district's backup standards and data retention policies, the district may backup and store any files or information stored on the district's information systems. The ISO will oversee the development and deployment of standards for data storage to ensure that backups are stored in a physically secure manner or are encrypted to protect their information.

Notice and Education: This administrative procedure will be posted on the campus electronically so that it is available to all district employees. This administrative procedure will also be disseminated via email to all district employees on an annual basis. The ISO will oversee the development of a program to educate district information systems users about implemented security standards and procedures, and measures that users can take to protect themselves in an online environment and to protect the security and privacy of district information systems.

2.6 Information Sharing and the Family Educational Rights and Privacy Act

Policies

Give a brief explanation of the purpose of FERPA and its role at your school. Include information such as:

- The type(s) of records parents and/or eligible students may inspect and review
- What information the school includes in its annual notification
- The limitations on inspecting and reviewing education records
- The parameters for amending education records
- The conditions by which prior consent is required to disclose information
- The conditions under by which prior consent is not required to disclose information
- Which school officials or entities are considered by the school to have legitimate educational interest, including any third-party to whom the school has outsourced institutional services

Resources:

99.30
99.31
Electronic Announcement, 9/5/17
99.3, Directory information, Disclosure, Education records
99.10
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024
99.12
99.20
99.7
99.2

- The conditions to disclose information to other educational agencies or institutions
- What personally identifiable information will be disclosed in directory information
- What personally identifiable information parents and eligible students can prevent from being disclosed in directory information
- What provisions apply to law enforcement records

99.34
99.37
99.8

 See ED's *Model Notification of Rights under FERPA for Postsecondary Institutions* on ED's website.

Response:

The MCCD complies with FERPA to safeguard the privacy of student education records. At the MCCD, the protection of student information is a priority. The release of PII related to student records is governed by FERPA and is subject to strict regulations. Under FERPA, the only information that may be released without prior written consent is data covered by FERPA or the Free Application for Federal Student Aid (FAFSA). Furthermore, under Title 34, Code of Federal Regulations (CFR) § 1090(a)(3)(C)(i) and FERPA § 99.31(a)(1), the release of this data is limited to specific situations.

In relation to routine financial aid office operations:

- **Confidentiality of Records:**
  - All financial aid records and conversations involving aid applicants are treated confidentially.
  - Access to student records is restricted to authorized personnel within the MCCD.
- **Information Sharing:**
  - Consent from students is obtained before disclosing personally identifiable information to third parties, except in cases allowed by FERPA.
- **Authorized Personnel:**
  - Only designated staff within the financial aid office have access to student financial aid information.
- **Data Security Measures:**
  - Some student records are stored in the school's secure student information system.
  - Physical safeguards, such as locked filing cabinets, are in place to protect hard copies of documents.

FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level. Students to whom the rights have transferred are considered to be eligible students.

- Parents or eligible students have the right to inspect and review the students' education records maintained by the school. Schools are not required to provide copies of records unless, for reasons such as great distance, it is impossible for parents or eligible students to review the records. Schools may charge a fee for copies.
- Parents or eligible students have the right to request that a school correct records which they believe to be inaccurate or misleading. If the school decides not to amend the record, the parent or eligible student then has the right to a formal hearing. After the hearing, if the school still decides not to amend the record, the parent or eligible student has the right to place a statement with the record setting forth his or her view about the contested information.
- Generally, schools must have written permission from the parent or eligible student to release any information from a student's education record. However, FERPA allows schools to disclose those records, without consent, to the following parties or under the following conditions (34 CFR § 99.31):
  - School officials with legitimate educational interest.

- Other schools to which a student is transferring;
- Specified officials for audit or evaluation purposes;
- Appropriate parties in connection with financial aid to a student;
- Organizations conducting certain studies for or on behalf of the school;
- Accrediting organizations;
- To comply with a judicial order or lawfully issued subpoena;
- Appropriate officials in cases of health and safety emergencies; and
- State and local authorities, within a juvenile justice system, pursuant to specific State law.

Schools may disclose, without consent, directory information such as a student's name, address, telephone number, date and place of birth, honors and awards, and dates of attendance. However, schools must tell parents and eligible students about directory information and allow parents and eligible students a reasonable amount of time to request that the school not disclose directory information about them. Schools must notify parents and eligible students annually of their rights under FERPA.

Procedures

Include information such as:

- How the office restricts the inspection and review of records by students, parents, and other parties
- How a parent or eligible student may amend an education record
- The steps a parent or eligible student takes to prevent personally identifiable information from being disclosed in directory information

Response:

Guidelines for Disclosure:

- Permitted Disclosures:
  - FERPA Data: Student records may only be disclosed to other school officials who have a legitimate educational interest in the information or as required for the administration of financial aid.
  - FAFSA Data: FAFSA data will only be shared with the administration for the purpose of processing applications, awarding, and administering financial aid, and only as permitted under the provisions of FERPA and FAFSA.
- Prohibited Disclosures:
  - FAFSA and FERPA data may not be shared with third-party agencies unless the student has provided written consent.
  - Third-party agencies that may not receive data without consent include, but are not limited to:
    - Scholarship Agencies
    - Tribal Agencies
    - Housing Authorities
    - Public Assistance Agencies
    - Other agencies requesting financial aid data
- Written Consent Requirement:
  - Written consent must be signed by the student before any release of data to third-party agencies. The release is granted solely for the purposes of applying for, awarding, or administering financial aid.
- Authorization to Release Student Information:
  - This form is available to students through Forms on the website. A

- Data Evaluation by Financial Aid Staff:
  - The financial aid staff will assess the request and determine what information can be disclosed. Typically, only aggregated data will be shared unless it is for the purpose of awarding a scholarship. In such cases, the requesting agency must present written consent from the student for FAFSA data to be shared.
- NASFAA Decision Tree: For guidance on releasing data in compliance with financial aid administration, please consult the NASFAA Decision Tree, which provides a clear framework for decision-making regarding data disclosure.

The MCCD adheres to FERPA and FAFSA regulations to ensure that all student information is handled appropriately and with respect to privacy. Any release of data to third parties requires the student's explicit written consent unless explicitly allowed under applicable regulations.

2.6.1 Internal Disclosure

Policies

Describe in detail the type(s) of student information the financial aid office will share with other school officials, as well as contractors, consultants, volunteers, or other parties to which the school has outsourced services or functions. For example, disclosure of FAFSA data with another office or individual depends entirely on the data being shared and how that office or individual intends to use that data.

You should specify the difference between FAFSA data and Federal Tax Information (FTI).

FAFSA data includes:

- The fact that the FAFSA was filed in and of itself;
- Answers to questions the student and parents are required to answer on the FAFSA for the calculation of the student aid index (SAI);
- Institutional Student Information Record (ISIR) and FAFSA Submission Summary (FSS) data;
- Key processing results;
- Student aid index (SAI);
- Student's financial aid history as reflected in the National Student Loan Data System (NSLDS);
- Non-federal tax information (FTI) ISIR data to determine award eligibility, and the resulting awards and disbursement data (including Federal Pell Grant eligibility);
- Federal Work-Study (FWS) awards and pay dates; and
- Information contained in the Common Origination and Disbursement (COD) System.

FTI includes:

- Tax year;
- Tax filing status;
- Adjusted gross income (AGI);
- Number of exemptions and number of dependents;
- Income earned from work;
- Taxes paid;
- Educational tax credits;
- Untaxed Individual Retirement Arrangement (IRA or Individual Retirement Account) distributions;
- IRA deductible and payments;
- Tax exempt interest;
- Untaxed pension amounts;
- Schedule C net profits/losses;

Resources:

HEA 483(a)(3)(E) [20 USC 1090]
99.33(a)
20 USC 1098h(c)(1) and (2)
26 USC 6103(l)(13)
99.31(a)(1),(9)-(11),(13)-(14),(16)
99.36
Electronic Announcement, 5/12/23 (GENERAL-23-34)
Electronic Announcement, 9/5/17

- Indicators for Schedules A, B, D, E, F, and/or H;
- IRS response code which indicates the status of the tax filer/FTI with the IRS, to include one of the following:
  - Tax filer and FTI provided to the FTI Module (FTIM),
  - Not found at the IRS,
  - Found and a nonfiler,
  - Found but IRS not able to provide information.
- Total Parent Allowances Against Income;
- Parent Payroll Tax Allowance;
- Parent Income Protection Allowance (IPA);
- Parent Employment Expense Allowance (PEEA);
- Parent Available Income (PAI);
- Parent Adjusted Available Income (PAAI);
- Parent Contribution (PC);
- Student Payroll Tax Allowance;
- Student Income Protection Allowance (IPA);
- Student Allowance for Parents' Negative Adjusted Available Income;
- Student Employment Expense Allowance (SEEA);
- Total Student Allowances Against Income;
- Student Available Income (StAI);
- Student Contribution from Income (SCI);
- Student Adjusted Available Income (SAAI);
- Total Student Contribution from SAAI;
- Student total income;
- Parent total income; and
- FISAP total income.

Additionally, the school should indicate the conditions under which services or functions are outsourced.

 As a good practice, you may include a policy about what type(s) of student information student employees may access.

Response:

Purpose: This policy establishes the procedures and guidelines for handling, sharing, and protecting Federal Tax Information (FTI) at the MCCD in compliance with federal regulations and institutional responsibilities. The goal is to ensure that the MCCD properly manages FTI while safeguarding student privacy and meeting legal requirements for sharing sensitive financial data, as outlined in FERPA, the IRS Publication 1075, Section 6103(l)(13) of the Internal Revenue Code (IRC), and the Federal Student Aid (FSA) Data Privacy and Security Guidelines.

Scope: This policy applies to all employees, contractors, and third parties who may have access to or be involved in the handling of FTI at the MCCD, including but not limited to the financial aid office and other departments involved in student services.

Definitions:

- **Federal Tax Information (FTI):** Information derived from an individual's federal tax return, including but not limited to adjusted gross income (AGI), income earned from work, tax filing status,

exemptions, dependents, and educational credits.

- **Data Sharing:** The act of releasing FTI to third parties, organizations, or individuals outside of the institution.
- **Authorized Personnel:** Employees or individuals who have been explicitly authorized by the institution to access or share FTI as part of their job duties.
- **Student Consent:** Written permission obtained from a student to share their FTI with designated individuals or organizations for specific purposes while adhering to the FERPA regulations.

See Sections 2.4.5 Confidentiality of Student Records and 2.6 Information Sharing

Procedures

Clearly identify the school employees who have the right to access student information with and without prior consent. Indicate differences in access (if any) that financial aid office personnel have to student records.

 As a condition of employment, your procedures may include a requirement that employees, particularly student employees, sign a confidentiality statement upon accepting a position with the financial aid office.

Describe the internal procedures to release student information to other school officials.

Response:

Authorization for Data Sharing: FTI will not be shared with anyone, including other departments within the institution, without the student's explicit written consent.

A consent form must be completed by the student to grant permission to release or discuss FTI. The form should specify:

- The recipient(s) of the information.
- The purpose for which the information is being shared.
- The duration of the consent.

The consent form allows the MCCD to share or discuss FTI with specified individuals or organizations while still adhering to FERPA regulations. The completed consent form will be stored securely and reviewed periodically to ensure that FTI is only shared with authorized recipients for approved purposes.

Approved Purposes for FTI Disclosure: FTI may only be shared for the following purposes:

- To assess and administer federal financial aid in accordance with the student's cost of attendance.
- For specific, approved purposes as requested by the student or other authorized parties.
- As required by law or in response to a lawful request from a governmental agency.

FTI will never be disclosed for purposes not specified in the student's consent form, and it will not be shared with any external parties beyond those explicitly named.

Data Security and Handling: FTI must be securely stored and transmitted: The data should always be protected during both storage and transmission to ensure it cannot be accessed or intercepted by unauthorized individuals.

Digital records containing FTI must be stored within the Colleague Ellucian system, Student Forms, or the FSA Partner Portal: All systems containing FTI must be password-protected, and access should be restricted to authorized staff members only: These systems must require passwords for access, and only staff members who are authorized to handle FTI should be able to access these systems.

Employee Training and Compliance:

- All employees who handle FTI must complete mandatory training on this policy and federal regulations regarding data privacy.

- Employees will be required to sign an acknowledgment of this policy and understand their obligations for handling FTI.
- The MCCD will conduct periodic audits to ensure compliance with this policy and federal regulations.

Accountability: The MCCD expects all personnel handling FTI to adhere strictly to this policy and applicable federal regulations. Failure to follow these guidelines may result in the restriction of access to FTI systems and may be addressed through appropriate institutional processes.

Periodic Review and Updates: This policy will be reviewed annually to ensure it remains aligned with current federal regulations and best practices. The policy will be updated as necessary to reflect changes in laws, institutional needs, or technology.

See Sections 2.4.5 Confidentiality of Student Records and 2.6 Information Sharing

2.6.2 External Disclosure

Policies

The school's policies should clearly state the types of and conditions under which information may be shared with students' parents or other educational agencies or institutions (e.g., state and local educational authorities, ED, accrediting agencies, law enforcement agencies, courts of law, etc.). Also provide the names of any state or local educational authorities and federal officials and agencies that may re-disclose personally identifiable student information without consent.

Note: Electronic Announcement, 7/13/23 (GENERAL-23-56) provides guidance to schools regarding nondisclosure agreements and former financial aid administrators or employees of the institution. NDAs do not prohibit former employees from speaking to ED about the administration of Title IV programs.

Response:

See Sections 2.4.5 Confidentiality of Student Records and 2.6 Information Sharing

Procedures

Include information about the receipt of court orders, subpoenas, and other requests by law enforcement agencies. Describe how such requests are addressed and who is responsible for responding to them. Cross-reference any authorization procedures in section 2.6.3 (Authorization Consent Form).

Response:

See Sections 2.4.5 Confidentiality of Student Records and 2.6 Information Sharing

Resources:

HEA 483(a)(3)(E) [20 USC 1090]
99.33(b)
20 USC 1098h(c)(1) and (2)
26 USC 6103(l)(13)
99.31(a)(2)-(16)
99.36
Electronic Announcement, 4/8/24 (GENERAL-24-35)
Electronic Announcement, 7/13/23 (GENERAL-23-56)
Electronic Announcement, 5/12/23 (GENERAL-23-34)
Electronic Announcement, 9/5/17
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024

2.6.3 Authorization Consent Form

Policies

Describe the authorization consent form used to grant access to or re-disclosure of student records (e.g., what information it collects, such as name, student ID, etc.). Describe the circumstances under which the consent authorization must be signed and include information about required signatures.

The policy should state the purpose of the disclosure, indicate which records the consent will disclose, identify the party to whom the disclosure may be made, and include a date and signature. Include information about where and how long consent forms are maintained. Include a copy of the authorization consent form in the forms appendix. Cross-reference section 2.6.5 (FERPA Related Recordkeeping Requirements).

Response:

See Section 2.6 Information Sharing and the Family Educational Rights and Privacy Act.

Resources:

99.32
99.30
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024

Procedures

Describe how the student or parent can initiate the information release process and specify a timeframe by which the person requesting the information will receive it. Include a description of how your school documents the student's file when access has been granted without the student's or parent's permission (e.g., files examined in an audit).

Resources:

2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024

Describe the form you include in a student's record when access has been granted without the student's or parent's permission (e.g., files examined in an audit). Include a copy of this form in the forms appendix.

Response:

See Section 2.6 Information Sharing and the Family Educational Rights and Privacy Act.

2.6.4 Information Release via Telephone

Policies

Your policies should also address when and what type of information will be released via the telephone. Describe the circumstances under which personnel will release information to someone other than the student, such as a dependent student's parent or independent student's spouse.

Resources:

2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024

Response:

Information regarding the student can be released to the student over the phone. Information can be released to a student's parent, spouse, or others identified on the FERPA form by the student, if they are listed on the form.

Procedures

Illustrate how office staff will ensure the person on the telephone has a right to receive the requested information, and what methods will be used to confirm the caller's identity.

Response:

Financial aid office staff will verify that they are speaking to the student by requiring the student to provide their school ID number. If there is any doubt, the student might also be asked for their date of birth, address, or other identifying information. At times, students may be asked to go to their portal and set up a virtual appointment to be sure they are speaking with the student.

If the individual contacting the office is someone other than the student, the financial aid office staff will verify that the person has been granted access via the FERPA form. If the person has not been granted access, the financial aid office staff will explain why information cannot be provided and will encourage the person to reach out to the student regarding the completion of the FERPA form.

2.6.5 FERPA Related Recordkeeping Requirements

Policies

Explain that the school must 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. For each request, indicate the parties who have 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.

Resources:

99.32
99.33(b)
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024

Response:

See Sections 2.4.5 Confidentiality of Student Records and 2.6 Information Sharing

Procedures

Indicate how the record of each request for access, disclosure, and re-disclosure is included and maintained in the student's education records for as long as the records are maintained. Cross-reference section 2.5 (Records Management and Retention) as necessary.

Response:

See Sections 2.4.5 Confidentiality of Student Records and 2.6 Information Sharing

2.X - Reserved for Institutional Use

This section is reserved for any institution-specific area of policies and procedures not covered in previous sections. It may be necessary to include several sub-sections of institution-specific content within this area. If there is no institutional content, simply leave the area blank, or mark the box Complete as preferred.

Section 3: Financial Aid Programs

3.1 Institutional Eligibility Requirements

To participate in the Title IV programs, the school must meet one of the following definitions of an eligible institution:

- Institution of higher education;
- Proprietary institution of higher education; or
- Postsecondary vocational institution.

Indicate which definition(s) your school meets. Indicate where to find documentation substantiating the school's institutional eligibility. Such documents may include, but are not limited to:

- Program Participation Agreement (PPA)
- Eligibility and Certification Approval Report (ECAR)
-  Accrediting agency letters
  - *Note: If any portion of a program is offered via distance education, it must be evaluated by its accrediting agency for effective delivery of distance education, as a substantive change if it meets or exceeds the distance education 50 percent threshold, and must follow any policies and procedures set by its institutional accrediting agency regarding distance education. See GEN-23-09 for details and exceptions.*
- State authorization or licensure documents indicating the school is authorized to offer programs through distance education or correspondence courses to students living in states other than where the school is physically located.

 Schools must determine that its programs have programmatic accreditation and meet education requirements for licensure in states where the institution is located, in states where the school enrolls distance education or correspondence students, and for any state that students attest they intend to seek employment. The school must also ensure programs comply with all state laws related to closure, i.e., record retention, teach-out plans or agreements, and tuition recovery funds or surety bonds.

An institution must make accreditation and licensing information and documentation available to enrolled and prospective students upon request. You may wish to cross-reference the student consumer section of your manual that addresses this requirement.

 If a school is controlled or owned by a foreign source, it must file two disclosure reports to ED each year. The first report is due by January 31 and the second report by July 31.

Schools that are not controlled or owned by a foreign source who receive a foreign gift or enter into a foreign contract, with a single or combined value of $250,000 or more, must file an online report with ED by the earlier of January 31 or July 31.

The report should include the following information:

- If the school is substantially controlled or owned by a foreign source, as well as the identity of the source, date the ownership or the control began, and any changes resulting from it
- Foreign gifts, included restricted gifts, with an individual or combined worth of $250,000 or more (including restricted gifts) within a calendar year
- Foreign contract amounts, including other terms, meeting the $250,000 or more (including restricted contracts) within a calendar year
- Identification, address, and type of the foreign source indicating if the source is: a foreign government; foreign legal entity; an individual who is not a citizen or national of the United States (U.S.) or a U.S. territory of protectorates; or an agent acting on behalf of one of these three

Resources:

600.2, Distance education
600
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024
600.4
2024-25 FSA Handbook, Vol. 2, Ch. 1, August 2024
600.9
668.14(b)(32)
600.5
Electronic Announcement, 8/24/23 (GENERAL-23-70)
600.6
668.14
Electronic Announcement, 10/20/23 (GENERAL-23-86)
Electronic Announcement, 9/21/23 (GENERAL-23-77)
GEN-23-09
HEA 117
20 U.S.C. Sec. 1011f
Federal Register, 11/13/20
Section 117 Foreign Gift and Contract Reporting Frequently Asked Questions
Electronic Announcement, 3/15/24 (GENERAL-24-22)
Electronic Announcement, 11/29/23 (GENERAL-23-107)
Electronic Announcement, 11/21/23 (GENERAL-23-106)
Electronic Announcement, 6/22/20

sources

- Detailed description of conditions or restrictions for conditional or restricted gifts.

Response:

The Merced Community College District (MCCD) participates in the Title IV programs as an institution of higher education. MCCD has eight schools that offer a range of online, in-person and hybrid programs designed to meet each student's learning goals, whether a student is interested in academic advancement, career training, transfer opportunities, or lifelong learning.

MCCD offers programs that are approved and listed on the Eligibility and Certification Report (ECAR) and on the Program Participation Agreement (PPA). MCCD's programs have programmatic accreditation and meet all education requirements.

Policies

An institution must periodically undergo recertification of its eligibility; the duration of eligibility is primarily linked to the expiration of its PPA.

Further, with certain exceptions, an institution's eligibility at any point is contingent upon its compliance with limitations on the number of:

- Regular students it enrolls without a high school diploma or its equivalent
- Regular students enrolled in correspondence courses
- Correspondence courses it offers
- Confined or incarcerated students enrolled as regular students

An institution's eligibility is also contingent upon whether the:

- Institution or one of its affiliates with the power to direct or cause the direction of the management of institutional policies files for bankruptcy or has an order for relief in bankruptcy entered against it; or
- Institution, its owner, or its chief executive officer has pled guilty to, pled nolo contendere to, or is found guilty of a crime involving the acquisition, use, or expenditure of Title IV funds, or has been judicially determined to have committed fraud involving Title IV funds.
-  Institution does not possess a repeated or unresolved significant negative finding or action by a Federal or State agency, court, or accrediting agency.

State your institution's policies with regard to monitoring its Title IV eligibility and:

- Identify who tracks the expiration of the PPA and who coordinates the recertification process
- Identify who is responsible for updating the information contained in your institution's PPA and ECAR (e.g., additional locations and new programs)
-  Ensure the PPA is signed by an authorized representative of the institution and for proprietary and private nonprofits, an representative authorized by an entity with direct or indirect ownership of the institution if the entity has the power to exercise institutional control
- State your institution's compliance with any of the limitations to which it is subject and who is responsible for monitoring compliance, or explain why the institution is exempt from a limitation.

If appropriate, you may wish to cross-reference the policies of other offices with compliance responsibility, but be sure to include in your manual the policies for any functions specific to the financial aid office.

Response:

MCCD offers programs that are approved and listed on the ECAR and on the PPA. The director of financial aid (DFA) in the financial aid office is responsible for tracking the expiration of the ECAR and PPA and coordinates the recertification process. The DFA is also responsible for making sure the ECAR and PPA are updated when new programs are added or when any changes take place that

Resources:

600.10(d)
668.16(k)(2)(i)
600.20(b)(2)
600.20(e)(3)
668.13(b)
668.14(g)
668.14(h)
600.7
600.7(b)(1) - (2)
600.7(c)
668.16(n)
600.21
668.32(c)(2)(ii)
600.2, Additional Location; Branch campus, Confined or incarcerated individual
668.14(a)(3)

require these documents to be updated.

Procedures

Detail how the financial aid office carries out its involvement in monitoring institutional eligibility. You may also wish to cross-reference procedures of other responsible offices.

Response:

Whenever the DFA is notified of any changes that affect the ECAR or PPA, they will log into FSA Partner Connect and click on the E-App where it says, “use the E-App to recertify or update information.” Once all appropriate signatures are collected, the signature page can be uploaded. All copies of the ECAR and PPA are kept in a folder on the shared drive.

3.1.1 Program Eligibility

Policies

To qualify as an eligible institution, the school must offer at least one eligible program and it is the school's responsibility to ensure a student is enrolled in an eligible program before disbursing Title IV aid. Provide a general definition of an eligible program for purposes of offering Title IV aid, as applicable to your institution type. If your school offers a comprehensive transition and postsecondary program for students with intellectual disabilities, detail how it meets the criteria specific to such programs.

Describe all eligible programs at your school (or groups of programs with the same characteristics) and include (at a minimum) the program's:

- Measurement of progress (i.e., clock hours or credit hours)
- Definition of an academic year
- Length of program, both in clock or credit hours and weeks of instructional time
-  Adherence to gainful employment requirements (GE) and financial value transparency requirements, including limiting the number of hours in a GE program to the greater of the minimum number of clock hours, credit hours, or the equivalent required for training in the recognized occupation for which the program prepares the student, as established by the state in which the institution is located or, in some cases, another state
- Structure (i.e., semesters, trimesters, quarters, subscription-based, nonstandard terms, or nonterm)
- Use of clock/credit hour conversion (if applicable)
- Recognized credential earned (e.g., academic degree, professional degree, vocational certificate, or other recognized educational credential)
- Equivalent of an associate degree (if applicable)
- Use of direct assessment (if applicable)
- Eligible prison education programs
- Any other applicable provisions (e.g., completion and placement rates)

Response:

- MCCD offers the following eligible schools of study. It is the responsibility of the financial aid office to ensure a student is enrolled in an eligible program before disbursing Title IV financial aid:
- School of Agriculture and Industrial Technology,
- School of Allied Health and Public Safety,
- School of Arts and Social Sciences,
- School of Athletics and Sport Sciences,
- School of Business and Economics,
- School of Education,

Resources:

600.10(c)
668.2 (b), Subscription-based program
668.8
668.231
668.232
2024-25 FSA Handbook, Vol. 2, Ch. 5, August 2024
668.3
668.8(b)(2), (3)
2025-26 FSA Handbook, Vol. 3, Ch. 1
668.14(b)(26)
Federal Register, 12/31/24, p. 107130
Federal Register, 10/10/23, pp. 70004 to 70193
600.2, Educational program
668.8(c)(3)
668.8(d)
668.8(g)
668.408(a)(2)-(4)
668.236
668, Subpart S
Electronic Announcement, 11/5/19
GEN-24-06
668.8(k), (l)
Electronic Announcement, 2/14/25 (GE-25-02)
668.8(a)
Electronic Announcement, 1/17/25 (GE-25-01)
668.8(b)
Electronic Announcement, 11/13/24 (GE-24-10)
668.10
Electronic Announcement, 9/13/24 (GE-24-08)
668.8(e)
Financial Value Transparency and Gainful Employment Information Frequently Asked Questions
GEN-23-05
2024-25 FSA Handbook, Vol. 2,

- School of Humanities and Liberal Arts, and
- School of Science, Technology, Engineering and Mathematics (STEM).

Other programs offered are:

- Merced College Online,
- Career and Technical Education,
- Adult Education and Noncredit,
- Workforce Education,
- Community Education,
- Honors Program,
- Digital Skills Training,
- Credit for Prior Learning,
- Rising Scholars,
- Work Experience Education, and
- California Virtual Campus.

MCCD functions as a semester-based credit hour institution. An academic year can include the fall semester, spring semester, and summer semester. For financial aid purposes, summer is a trailer. For students enrolled in both the fall and spring semesters, financial aid is set up for 32 weeks. Each semester has 16 weeks of instruction. For the summer semester, it is set up for 12 weeks.

Financial Value Transparency (FVT) and Gainful Employment (GE) Regulations:

Adherence to these regulations, including limiting the number of hours in a GE program to the greater of the minimum number of credit or clock hours required for training in the recognized occupation for which the program prepares the student, as established by the state in which the institution is located. The deadline to submit the FVT/ GE reports to the National Student Loan Data System (NSLDS) for the 2025 award year is September 30, 2025.

Currently, the MCCD does not have any programs that would be considered gainful employment.

Procedures

Explain how your school determines a program's eligibility, referencing the offices responsible for this determination. Also, explain how your school re-evaluates the eligibility of existing programs and changes to existing programs, as well as how those changes are reported (if required). You may wish to cross-reference the reporting and recordkeeping section of the manual. Describe how your school ensures a student is enrolled in an eligible program.

Indicate the accrediting agency that recognizes each program, unless the program is not required to be accredited.

Include any information about how the state agency approves the program if the program requires state authorization. Also include information on how the school demonstrates it has been established by name as an educational institution by a state through a specified method or other action issued by an appropriate state agency or state entity, as well as on how the school demonstrates it is authorized to operate educational programs beyond secondary education, including programs leading to a degree or certificate. Unless it is a tribal or federal institution, also include information about the state's procedures to review and appropriately act on complaints concerning the institution, including enforcement of applicable state laws.

If your institution offers a comprehensive transition and postsecondary program for students with intellectual disabilities, describe the program, including:

- The institution's procedures for determining whether or not enrolled students are making satisfactory progress as defined for its comprehensive transition and postsecondary program for students with intellectual disabilities
- The number of weeks of instructional time and the number of semester or quarter credit hours or clock hours in the program, including the equivalent credit or clock hours associated with noncredit

Ch. 2, August 2024

Resources:

2024-25 FSA Handbook, Vol. 2, Ch. 2, August 2024
2024-25 FSA Handbook, Vol. 2, Ch. 5, August 2024
600.2,State authorization reciprocity agreement
600.9(a), (b)
668.43(a),(c)
Federal Register, 7/3/18
Federal Register, 6/24/14, pp. 35692 to 35693
GEN-15-10
GEN-14-04
GEN-13-20
GEN-12-13
GEN-11-05
GEN-11-01
668.232(b), (c), (d), (e)
668.156
668.157
2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024
GEN-15-09
GEN-16-09

or reduced credit courses or activities

- A description of the educational credential offered (e.g., degree or certificate) or identified outcome or outcomes established by the institution for all students enrolled in the program

If your school offers an eligible career pathway program, describe the program, including:

- Describe how the institution determines an eligible career pathway program and document the basis for such a determination. The institution must meet the statutory requirement that an eligible career pathway program consist of two connected education components, an adult education component integrated with a Title IV eligible postsecondary program component.
- The institution's procedures to allow a student who does not have a high school diploma (or its recognized equivalent), or who did not complete a secondary school education in a homeschool setting, to be eligible for Title IV, HEA student assistance (Title IV aid) through ability to benefit (ATB) alternatives

Indicate the accrediting agency your institution notified regarding your comprehensive transition and postsecondary program for students with intellectual disabilities.

Response:

It is the responsibility of the admissions and records office to ensure that a student is enrolled in an eligible program. The re-evaluation of new and existing program eligibility and changes to existing programs is governed by this office. Since the admissions and records office inputs all eligible programs for each student's program of study into the system, all units identified in the system are considered units that can apply to the student's program of study when the financial aid office verifies enrollment units for financial aid.

The MCCD is accredited by the Western Associations of Schools and Colleges (WASC). The accrediting agency aids the MCCD in developing and sustaining effective educational programs, while assuring the community that the accredited institution has met the high standards of quality and effectiveness.

Electronic Announcement, 10/22/15
P. L. 113-235
HEA 484(d)(2)
668.2
668.32

3.1.1.1 Ineligible Programs

Policies

Provide a definition of an ineligible program for purposes of awarding Title IV aid, as applicable to your institutional type.

Response:

The following programs are not eligible for Title IV financial aid:

- Environmental Horticulture,
- Pest Control Advisor,
- Computer Programming,
- Cloud Computing,
- Computer Systems Professional,
- Cybersecurity,
- Network Professional,
- Security Professional,
- System Administrator,
- Computer-Aided Design & 3D Modeling,
- Drone Media,
- Drone Technology,
- Basic Electronics,
- Paramedicine: Pre-Professional,
- California State University General Education Breadth, and

- Intersegmental General Education Transfer Curriculum.

MCCD also does not offer Title IV financial aid to the Adult Education and Noncredit programs, Community Education programs, or Credit for Prior Learning.

Procedures

List all programs that do not meet the definition of a Title IV-eligible program and describe the procedures to ensure students enrolled in these programs do not receive Title IV aid.

Response:

To ensure that Title IV financial aid is not offered to students in certain programs, the school's student information (SIS) system will flag a program as Title IV eligible. If that designation is not there, then funds will not be awarded.

3.1.1.2 Evaluation of New Programs

Policies

List the evaluation criteria a new program must meet in order to be considered an eligible program, and indicate the parties or offices responsible for this evaluation.

Resources:

600.10(c)

Response:

The MCCD must update information about its educational programs when completing its recertification application and whenever a new program is established. This includes updating Classification of Instructional Programs (CIP) codes, program names, and program lengths.

The vice president of instruction will inform the DFA of new courses or programs that have been approved by the campuses' curriculum committee. Once this information is received, the DFA will update the E-App and submit it to the Department of Education (ED) for approval. No financial aid will be given to students enrolled in these courses until approval has been granted by ED.

Procedures

Include a description of the procedures followed to evaluate the eligibility of new programs and how new programs are reported. You may wish to cross-reference the reporting and recordkeeping section of the manual.

Resources:

2024-25 FSA Handbook, Vol. 2, Ch. 5, August 2024

Response:

Within 10 days of receiving final approval to add the program from the accreditation agency, governing authority, and other oversight bodies, MCCD must submit an E-App with the appropriate sections completed and copies of the approvals from the accrediting agency and state authorizing agency. ED will evaluate the submission and, if they approve the program, send a revised ECAR and approval letter to MCCD. Any new program must have ED approval prior to awarding and disbursing Title IV funds.

3.1.2 Administrative Capability

To maintain its participation in the Title IV program, an institution must demonstrate it has the capability to administer the programs adequately by meeting certain criteria. Give a brief explanation of administrative capability and include information about the administrative capability standards schools are expected to demonstrate. While it is not required that you list all of the criteria in your manual, doing so many prove helpful to financial aid office staff members or other nonfinancial aid office persons who may review your policies and procedures manual.

Resources:

668.16(n)
668.16
668.16(k)
668.16(t)
668.16(u)
668.16(r)
668.16(q)

 Changes to 668.16 became effective July 1, 2024. It is recommended that these regulations are reviewed to ensure all areas are covered in your policies and procedures. These changes include the following:

- The institution must not have been subject to a significant negative action or finding and not lost eligibility to participate in another federal educational assistance program due to an administrative action against the institution
- Principals and affiliates must not be debarred or suspended or involved in any activity which may cause debarment or suspension
- Less than half of an institution's total Title IV revenue can come from gainful employment (GE)

programs that are failing the GE metrics

- Institutions must not engage in substantial misrepresentation, which is defined in 668.71(c) or aggressive and deceptive recruitment
- Providing adequate career services to eligible students who receive Title IV aid
- Providing geographically accessible clinical or externship opportunities related to and required for completion of the credential or licensure within 45 days of the student's completion of required coursework

Policies

Response:

The MCCD demonstrates administrative capability by hiring and training financial aid administrators and support staff to adequately administer the Title IV HEA programs in accordance with federal regulations and the new policies as outlined in GEN 24-07.

Procedures

Response:

- Administers Title IV HEA programs in accordance with all statutory provisions. The MCCD participates in an annual Uniform Guidance Single Audit and has not been subject to any significant negative action or finding and has not lost eligibility to participate in federal educational assistance programs due to an administrative action against the institution.
- Designates a capable individual to be responsible for administering all Title IV HEA programs in which the institution participates and for coordinating those programs with the institution's other federal and state programs of student financial assistance.
- Utilizes an adequate number of qualified persons to administer the Title IV HEA programs in which the institution participates.
- MCCD has a senior leadership team that oversees the Title IV management under the direction of the DFA. Office staff regularly participate in the National Association of Student Financial Aid Administrators (NASFAA) training courses, and they also participate in conferences and ED training.
- Has written procedures for or written information indicating the responsibilities of various offices with respect to the approval, disbursement, and delivery of Title IV aid and the preparation and submission of reports.
- Administers Title IV HEA programs with adequate check and balances in its system of internal controls and divides the functions of authorizing payments and disbursing funds.
- For the purposes of determining student eligibility for assistance, MCCD has established, published, and applied standards of satisfactory academic progress in accordance with the provisions specified in CFR 668.34. CSUCI has a satisfactory academic progress (SAP) policy that meets federal requirements.
- Develops and applies an adequate system to identify and resolve discrepancies in the information received from various sources with respect to a student's application for federal aid.
- Make referrals to the Office of the Inspector General (OIG) of ED for investigation based on false information, forgery, and fraud or credible information indicating that an employee, third-party servicer, or other agent of the institution may be engaged in fraud, a breach of fiduciary responsibility or other illegal conduct.
- The financial aid office is dedicated to customer service and providing appropriate information and adequate financial aid counseling to students so that they can make informed financial decisions.
- MCCD does not engage in any misrepresentation which would be defined as aggressive and deceptive recruitment.
- Has provided all program and fiscal reports and financial statements required for compliance in a timely manner.
- Has a cohort default rate (CDR) that is less than 25% for each of the three most recent fiscal years during which rates were issued. The CDR for MCCD is 0% based upon the most recent three-year

cohort default rate data.

- Shows no evidence of significant problems that would impact the institution's ability to administer Title IV aid. During the fiscal year 2024 audit, there were no findings.

3.1.2.1 Provisions

Policies

The institution must administer the Title IV program in accordance with all applicable statutory and regulatory provisions. Any additional special arrangements, agreements, or limitations into which it has entered must also be observed.

Response:

See Section 2: Administrative Organization and Office Management

See Section 2.1 Institutional Divisional Structure

Procedures

Describe how the provisions, arrangements, agreements, and limitations are monitored. Include information about all offices involved, as well as the role they play, in ensuring the school is administratively capable.

Response:

See Section 2: Administrative Organization and Office Management

See Section 2.1 Institutional Divisional Structure

Resources:

668.16(a)

3.1.2.2 Administration

Policies

The institution must:

- Designate a capable individual to be responsible for administering and coordinating the institution's financial aid programs
- Use an adequate number of qualified persons to administer the Title IV programs, which includes clear and adequate financial aid counseling on the cost of attendance, source and amount of each type of aid, net price, and the method by which aid is determined and disbursed (You may wish to cross-reference the financial aid office structure and position responsibilities section of your manual if it addresses this criterion.)
- Communicate to the individual designated as responsible for administering Title IV programs all the information received by any institutional office that impacts a student's Title IV eligibility

Response:

See Section 2: Administrative Organization and Office Management

See Section 2.1 Institutional Divisional Structure

Procedures

List the person responsible for administering and coordinating the institution's financial aid programs. List the person(s) who administer the Title IV programs. Include information about all offices involved and the qualifications of these individuals.

Describe how the institution ensures communication of information that impacts a student's Title IV eligibility received by any institutional office to the person(s) listed as responsible for administering and coordinating the institution's financial aid programs.

Response:

See Section 2: Administrative Organization and Office Management

See Section 2.1 Institutional Divisional Structure

Resources:

668.16(b)(1), (2), (3)
668.16(h)
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024

3.1.2.3 Responsibilities of Institutional Offices

Policies

The institution must have written procedures for or written information indicating the responsibilities of

Resources:

various offices with respect to the approval, disbursement, and delivery of Title IV program assistance and the preparation and submission of reports to the U.S. Department of Education (ED). You may wish to cross-reference the institutional and divisional structure section of your manual if it addresses this criterion.

Response:

See Section 2: Administrative Organization and Office Management

See Section 2.1 Institutional Divisional Structure

668.16(b)(4)

Procedures

Describe the responsibilities of other institutional offices as they relate to the administration of Title IV programs with respect to the:

- Approval, disbursement, and delivery of financial assistance, including the requirement that Title IV funds must be disbursed to students in a timely manner that best meets the needs of students
- Preparation and submission of reports to ED (cross-referencing the reporting and recordkeeping section of this manual)

Response:

See Section 2: Administrative Organization and Office Management

See Section 2.1 Institutional Divisional Structure

Resources:

668.16(s)

3.1.2.4 Separation of Duties

Policies

The institution must administer the Title IV programs with adequate checks and balances in its system of internal controls. The functions of authorizing payments and disbursing or delivering Title IV funds must be divided among organizationally independent individuals so no office has responsibility for both functions. You may wish to cross-reference the institutional and divisional structure section of your manual if it addresses this criterion.

Response:

See Section 2: Administrative Organization and Office Management

See Section 2.1 Institutional Divisional Structure

Procedures

Describe how the authorizing and disbursing functions are handled to ensure the separation of duties and functions. Include the procedural responsibilities of all offices involved.

Response:

See Section 2: Administrative Organization and Office Management

See Section 2.1 Institutional Divisional Structure

Resources:

668.16(c)
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024

3.1.2.5 Records

Policies

The institution must establish and maintain records as required under the General Provisions and individual Title IV program regulations. You may wish to cross-reference the records management and retention section of your manual.

Response:

See Section 2: Administrative Organization and Office Management

See Section 2.1 Institutional Divisional Structure

Procedures

List all offices involved in records management and retention. Describe each office's responsibilities. You may wish to cross-reference the records management and retention section of your manual.

Response:

Resources:

668.14(b)(4)
668.16(d)(1)
674.19(e)
675.19(b)
676.19(b)
682.610(b)
685.309(c)
686.38
690.82(a)
668.24
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024

See Section 2: Administrative Organization and Office Management

See Section 2.1 Institutional Divisional Structure

3.1.2.6 Electronic Processes

Policies

The institution must participate in the electronic processes identified by ED. If the institution implements electronic signatures in its financial aid processes, you should outline the associated policies here. You may also wish to cross-reference other sections of the manual to which electronic signatures apply.

Response:

The financial aid office utilizes electronic processes that are required to be considered administratively capable of participating in federal student aid programs. It is the responsibility of the DFA to ensure compliance with the administrative capability requirements. The MCCD has also implemented Ellucian Student Forms for students to complete, sign, and upload verification documents.

Procedures

List and describe the institution's participation in electronic processes mandated by ED. If the institution implements electronic signatures in its financial aid processes, you should outline the associated procedures here. You may also wish to cross-reference other sections of the manual to which electronic signatures apply.

Response:

The federal and state electronic platforms and processes include:

- **FSA Partner Connect:** FSA Partner Connect is the website library of Federal Student Aid (FSA) resources, including the FSA Handbook, regulation updates, and guidance. The Student Aid Internet Gateway (SAIG) Enrollment website has been retired, and all enrollment actions, including new or updated enrollments, are handled through FSA Partner Connect. There are quick links to the following platforms:
  - **Common Origination and Disbursement (COD)**: This is used to reconcile and maintain the Federal Pell Grant and Federal Direct Loans.
  - **National Student Loan Data System (NSLDS):** This is used to verify FSA program payments and overpayments, transfer student monitoring, enrollment reporting, Pell lifetime eligibility used (LEU) status and receiving and submitting Gainful Employment reporting data.
  - **eZ-Audit:** This is used to submit the annual compliance audit and audited financial statements.
  - **2025-26 FAFSA Partner Portal:** A website for financial aid administrators to access the 2025-26 FAFSA information.
- **TDClient:** This is the software used to import/export Pell records to/from the Central Processing System (CPS/SAIG). This is also the software used to maintain the Pell database and records.
- **G5:** Used to draw down Title IV funds as well as make returns of excess cash electronically. The site provides continuous reporting capability of an institution’s funding by program and year.
- **Student Forms:** A platform provided by the Ellucian Company to collect required documents from students and to complete verification.
- **California Student Aid Commission (CSAC) and WebGrants:** This is the web-based database used to process and maintain State of California student records and payment of the various California state programs.

Resources:

668.16(o)
GEN-01-06
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024

3.1.2.7 Checking Validity of High School Completion

Policies

An institution must develop and follow policies and procedures to evaluate the validity of a student's high school completion if the institution or ED has reason to believe that the high school diploma is not valid or was not obtained from an entity that proves secondary school education (i.e., a diploma mill).

Resources:

668.16(p)
2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024

Procedures must include collecting at least one of the following from the high school:

- Transcripts;
- Written descriptions of course requirements; or
- Written statements from high school officials attesting to the rigor and quality of coursework.

If the high school is regulated by a state or tribal authority, documentation confirming the high school is recognized by the appropriate agency.

You might cross-reference your institutional policies in 3.1.2.8, "Information Discrepancies".

Policies should include the resources used to confirm the validity of the documentation, such as the education department or agency for the state in which the high school is located, companies that evaluate transcripts from foreign high schools, or other institutions of higher education.

2024-25 FSA Handbook, Vol. 2, Ch. 1, August 2024

Response:

According to Title IV regulations, a student must be qualified to study at the postsecondary level to receive financial aid. A student may qualify by meeting any of the following criteria:

- Receive a high school diploma
- Receive a GED certificate
- Complete a secondary level home schooling program

Students may self-certify that they have completed a high school diploma or GED or a home-school program at the secondary level as defined by state law. If a student indicates on the FAFSA that they have received a high school diploma or GED and the school has reason to question the accreditation of the high school or the graduation status of the student, a copy of the high school transcript, diploma or GED certificate may be required. Online high school diplomas will be evaluated for validity in accordance with the ED and CSAC guidance. MCCD reserves the right to disallow an online high school diploma that, upon investigation, appears to lack validity.

Procedures

Define the office(s) responsible for evaluating the validity of a student's high school completion. Describe potential criteria or circumstances which would prompt concern regarding the validity of a student's high school completion or the entity providing the secondary education, such as a high school which charges a fee for a diploma but provides little or no educational instruction for the diploma.

Response:

If there is any question regarding the validity of a high school transcript, ED has published the Database of Accredited Postsecondary Institutions and Programs (DAPIP) that lists schools that are accredited by accrediting agencies recognized by the Secretary of Education.

3.1.2.8 Information Discrepancies

Policies

The institution must develop and 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. You may wish to cross-reference the conflicting and inaccurate information section of your manual.

The institution must refer for investigation to ED's Office of Inspector General (OIG) any credible information indicating a Title IV aid applicant, school employee, or third-party servicer may have engaged in fraud or other criminal misconduct or fraud in connection with the Title IV programs.

Resources:

668.16(f)
668.16(g)
2025-26 FSA Handbook, Vol. AVG, Ch. 5
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024

Response:

See Section 7: File Review and Verification and See Section 14: Title IV Fraud

Procedures

Describe the system used to identify discrepancies in information received from different sources with respect to a student's application for Title IV aid, as well as the methods used to communicate that

information to the financial aid office. List the steps taken to resolve such discrepancies. Describe any steps taken to consult with your school's legal counsel before referring a case to the OIG, and describe the steps required to refer a case to the OIG.

Response:

See Section 7: File Review and Verification and See Section 14: Title IV Fraud

3.1.2.9 Reviews & Proceedings

Policies

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

- Program reviews conducted by ED, an accrediting agency, or a state agency
- Audits conducted by ED, an accrediting agency, or a state agency
- Internal audits
- Findings made in any criminal, civil, or administrative proceeding

The institution must not be debarred, suspended, or engaged in any activity that is a cause for debarment or suspension and must not have any principal or affiliate of the institution, or an individual who currently exercises or previously exercised substantial control of the institution who is or has been debarred, suspended, or engaged in any activity that is a cause for debarment or suspension.

Response:

See Section 16: Audits

Procedures

Indicate the procedures for maintaining and accessing the latest program reviews conducted by ED, an accrediting agency, or a state agency. Include the latest program reviews and provide the findings from the latest audits completed by any of these entities at your institution.

Note: As part of its on-going training efforts, NASFAA's Compliance Engine allows administrators to evaluate their programs in a centralized, shared online space. The Self-Evaluation Checklists Guide is the basis of the Compliance Engine checklists. Toggle to the Compliance Engine checklists using the button in the upper right of any page.

NASFAA's Standards of Excellence (SOE) Review Program, administered by Blue Icon Advisors, is an objective, confidential peer review that will help your school provide students and their families with quality customer service, deliver financial aid funds in a cost-effective manner, maximize resources, and ensure regulatory compliance. When you choose a NASFAA Standards of Excellence Review, you receive a confidential assessment of your operations by qualified, experienced financial aid peer reviewers; unbiased reports highlighting your program's strengths and weaknesses without penalties or fines; and strategic recommendations for achieving excellence. Additional information is available on the NASFAA Blue Icon Advisors website.

Information regarding ED's audit processes may be found on ED's eZ-Audit website.

Response:

See Section 16: Audits

Resources:

668.16(j)
668.16(k)
2024-25 FSA Handbook, Vol. 2, Ch. 8, August 2024
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024
2024-25 FSA Handbook, Vol. 2, Ch. 4, August 2024

3.1.2.10 Cohort Default Rates

Policies

The institution's Federal Direct Student Loan (Direct Loan), Federal Family Education Loan (FFEL), and/or Federal Perkins Loan cohort default rates must not exceed the thresholds defined by ED. If the institution participates in a default prevention or reduction plan, outline the policies of that plan (whether imposed by the institution or by ED).

Response:

The Federal Cohort Default Rate (CDR) is calculated and provided annually by ED. The resulting calculation is posted on the ED website. The CDR is reviewed and monitored annually by the DFA.

Resources:

668.16(m)
668.171(c)(2)(viii)
668 Subpart N
674.5
GEN-14-03
GEN-05-14
Cohort Default Rate Guide

Resources:

Electronic Announcement 2/24/25 (LOANS-25-03)
Electronic Announcement, 9/23/24 (LOANS-24-08)
2024-25 FSA Handbook, Vol. 6, Ch. 5, June 2024
2024-25 FSA Handbook, Vol. 2, Ch. 4, August 2024

Procedures

Include your institution's latest cohort default rates for Direct Loan, FFEL, and/or Federal Perkins Loans, as applicable. If the institution utilizes ED's Default Reduction Assistance Program (DRAP) for Federal Perkins Loans, include the process by which the institution identifies borrowers for DRAP.

Response:

The MCCD fiscal year (FY) 3-Year (2020, 2021, and 2022) CDR is 0%.

3.1.3 Financial Responsibility

Institutions must meet certain financial standards to begin and continue participation in the Title IV programs. Some of the standards are general, and some are specific to institution type (public, nonprofit, for-profit).

There are several new general requirements which institutions must meet to be considered financially responsible.

To demonstrate financial responsibility, the institution must:

- Have the ability to meet all of its financial obligations while providing the resources necessary to comply with the administration of Title IV program requirements;
- Maintain a composite score of at least 1.5 in its Equity, Primary Reserve, and New Income ratios yield; and
- Possess sufficient cash reserved to return make the required unearned Title IV funds.

Institutions must also demonstrate the ability to:

- Pay Title IV credit balances, as required;
- Make payments in accordance with any existing, undisputed financial obligation; and
- Make payroll payments in accordance with its published payroll schedule.

Institutions also cannot borrow funds from retirement or restricted funds without authorization.

Note, this is not an exhaustive list of new requirements; refer to Subpart L of 668 for a complete explanation of the fiscal responsibility requirements, including changes in ownership.

For detailed information, you might cross-reference the policies and procedures manual of the office primarily responsible for compliance with the financial standards.

Resources:

668.171(b)(3)
Federal Register, 10/31/23, pp.74568 to 74710
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024
668.171
668, Subpart L
Electronic Announcement, 8/24/23 (GENERAL-23-70)
668.171(b)(1)
668.171(b)(2)
668.173
668.176
668.171(g)

Policies

Response:

The MCCD, as a Title IV-participating institution, maintains financial responsibility standards as required under 34 CFR 668 Subpart L.The college ensures it has the necessary financial resources to provide the education promised to students and to meet all regulatory and administrative financial obligations related to Title IV federal student aid programs.

Procedures

Response:

During the 2022-2023 academic year, the MCCD completed the 5-Year Merced College Educational Master Plan (EMP), which was a collaborative and participatory process and approved by the Board

of Trustees. The EMP is the guiding plan to lead the college through a five-year cycle. The Educational Master Planning Committee (EMPC) is the governing body providing oversight and tracking/reporting the progress to constituencies throughout the college.

The EMP is the over-arching guiding plan, and the district is currently working on the Strategic Implementation Plan (SIP) which includes the operational tasks and activities to get the important work of the master plan completed.

3.1.4 Reporting & Reconciliation

The institution 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. List all the required Title IV reports and financial statements. The procedures will be different for each report. Items that must be reported and reconciled are listed in the *FSA Handbook,* Volume 4, Appendix A and B. The institution should provide examples of policies and procedures for program reports, fiscal reports, and financial statements.


Note: The Single Audit Act is a requirement of the Office of Management and Budget (OMB) and not of the U.S. Department of Education (ED). NASFAA does not regularly track Single Audit Act submission deadlines. Please reach out to your school's Single Audit Act compliance contact or the Office of Federal Financial Management at GrantsTeam@omb.eop.gov


Institutions must be aware of financial triggers which may be indicators of financial instability. Triggers are financial events or conditions which may occur between when an audited financial statement is submitted and may demonstrate a significant adverse effect on the financial condition of the institution. There are three triggers, including two types of mandatory triggers and discretionary triggers. When certain triggers occur, ED must be notified within 21 days of the trigger event.

Policies

Response:

It is the policy of the MCCD through the financial aid office to submit all required reports to ED on or before the required deadline date. MCCD provides all program reports, fiscal reports, and financial statements required for compliance with Title IV program provisions. It also continuously reconciles the Title IV programs in which it participates on at least a monthly basis.

Procedures

Response:

MCCD must be aware of financial triggers which may be indicators of financial instability. Triggers are financial events or conditions which may occur when an audited financial statement is submitted and may demonstrate a significant adverse effect on the financial condition of the institution. There are three triggers, including two types of mandatory and discretionary ones. Triggering events must be reported within 21 days of the event.

Below is a list of all the required Title IV reports and financial statements:

- Annual Fiscal Operations Report and Application to Participate (FISAP)
- Annual A-133 Uniform Guidance Audit through eZ-Audi.
- Monthly Enrollment and program level student enrollment information to the Clearinghouse
- Monthly Federal Pell Grant and Federal Direct Loan reporting to COD
- Monthly Bank Reconciliations and Federal Drawdowns

The financial aid office reconciles all Pell Grant disbursement activity monthly and at the end of the award year. After confirming a zero cash balance, the DFA will officially process a close out of the award year with COD. All reconciliation records are stored for audit purposes on the shared drive.

Resources:

668.16(i)
674.19(d)
675.19(b)(2)(iv)
676.19(b)(2)
668.171(c)
685.300(b)(5)
2024-25 FSA Handbook, Vol. 2, Ch. 4, August 2024
668.171(d)
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024
2024-25 FSA Handbook, Vol. 4, Ch. 5, April 2024
668.239
GEN-24-07
2024-25 FSA Handbook, Vol. 4, Ch. 6, April 2024
2024-25 FSA Handbook, Vol. 4, Appendix A
2024-25 FSA Handbook, Vol. 4, Appendix B
Electronic Announcement, 9/28/23 (GENERAL-23-83)

3.1.4.1 Fiscal Operations Report and Application to Participate

Note: Additional information regarding the FISAP may be found on ED's Common Origination and Disbursement (COD) System website.

Policies

Institutions that participate in any of the campus-based programs must accurately prepare the Fiscal Operations Report and Application to Participate (FISAP). The FISAP must be submitted in a timely manner on an annual basis.

Response:

The MCCD DFA in the financial aid office is responsible for completing the FISAP report in an accurate and timely manner meeting all reporting deadlines on an annual basis.

Procedures

Enumerate the step-by-step procedures by which the FISAP is completed, verified for accuracy, and submitted to ED. Indicate which offices and personnel are responsible for each step. Include a FISAP preparation and submission schedule.

Response:

The DFA in the financial aid office compiles the FISAP data, which can be extracted from the Ellucian Colleague system and reviewed for accuracy. Once completed, the FISAP file is transmitted via EDConnect. The process is started as early as possible to ensure that the FISAP is submitted by the Sept 30th deadline.

Resources:

2024-25 FSA Handbook, Vol. 6, Ch. 1, June 2024

3.1.4.2 National Student Loan Data System

Policies

The institution must accurately report student information to the National Student Loan Data System (NSLDS), such as Federal Pell Grant, Teacher Education Assistance for College and Higher Education (TEACH) Grant, and Federal Supplemental Educational Opportunity Grant (FSEOG) overpayments and for transfer student monitoring.

Detail the school's NSLDS Enrollment Reporting policies for coordinating and reporting campus level and program level student enrollment data. Indicate which campus office is responsible for responding to Enrollment Reports submitted to the school for completion, and detail the role of any third-party servicer used in this process. Also indicate who is responsible for ad hoc changes to a student's enrollment status information. Indicate all related reporting time frames and deadlines. Cross-reference the policies and procedures of any other offices involved in the Enrollment Reporting process.

NSLDS reference materials and user documentation may be found on ED's Federal Student Aid (FSA) Knowledge Center.

Response:

The MCCD uses NSLDS for Transfer Monitoring for transfer students and for reporting the enrollment status of each student.

Procedures

Detail the steps required to complete and verify the accuracy of student information reported to NSLDS. Identify the personnel responsible for each step.

Response:

The MCCD is required to add transfer students to the NSLDS Transfer Monitoring to ensure Pell Grant funds are not disbursed by another school before GRTS disburses Pell Grant. MCCD is required to report enrollment data to the NSLDS at least every 60 days. MCCD must also respond to NSLDS within 15 days of receiving a roster file. The date of determination is the date when the school becomes aware of a student's enrollment status change. The FAC in the financial aid office handles transfer monitoring.

For reporting enrollment statuses, the admissions and records office provide enrollment reporting data in partnership with the National Student Clearinghouse (NSC).

Resources:

GEN-98-14
NSLDS Transfer Student Monitoring & Financial Aid History User Guide and Record Layouts
2024-25 FSA Handbook, Vol. 4, Ch. 5, April 2024
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024
674.19(f)
682.210(c)
GEN-14-17
GEN-14-07
NSLDS Enrollment Reporting Guide
685.309(b)

3.1.4.3 Program-Specific Reporting

Note: Additional information regarding COD may be found on ED's COD System website under COD Resources.

Policies

Explain the institution's responsibilities as they relate to program-specific reporting, such as COD System reporting responsibilities for Federal Pell Grants, FSEOG, TEACH Grants, FWS wages, and Direct Loans.

Note: FWS wages for the previous calendar year are reported back to ED using COD.

Response:

See Section 3.1.4 Reporting & Reconciliation

Resources:

GEN-13-13
Electronic Announcement, 7/21/23 (CB-23-13)
2025-26 COD Technical Reference, February 2025

Procedures

Include a reconciliation schedule and identify the office and personnel responsible for reconciling each financial aid program. Enumerate the step-by-step procedures by which each report is completed, verified for accuracy, and submitted to ED. Indicate which offices and personnel are responsible for each report. Include a submission schedule for each report.

Response:

See Section 3.1.4 Reporting & Reconciliation

Resources:

674.19(d)
676.19(b)(2)
675.19(b)(2)(iv)
685.300(b)(5)
2024-25 FSA Handbook, Vol. 4, Ch. 5, April 2024
2024-25 FSA Handbook, Vol. 4, Ch. 6, April 2024

3.1.4.4 Non-Title IV Program-Specific Reporting

Policies

Explain the institution's responsibilities as they relate to other non-Title IV program-specific reporting, e.g., state.

Response:

The MCCD is responsible for providing all reporting and reconciliation of the California State Grant programs with the California Student Aid Commission (CSAC).

Procedures

Include a reconciliation schedule and identify the office and personnel responsible for reconciling each non-Title IV program. Enumerate the step-by-step procedures by which each report is completed, verified for accuracy, and submitted to the applicable entity. Indicate which offices and personnel are responsible for each report. Include a submission schedule for each report.

Response:

Reconciliation is conducted every two weeks after each disbursement, but at a minimum, monthly. The DFA and the FAC run reconciliation reports through the SIS and compare it to the COD reports. The financial aid office meets with fiscal services to review state and federal programs to reconcile if needed.

Reconciling all the California State Grant programs is done monthly by the FAC.

3.1.5 Copyright Infringement and Peer-to-Peer File Sharing

Policies

Detail your school's written plans to effectively combat the unauthorized distribution of copyrighted materials by users of the school's network, including at least one technology-based deterrent. Include any measures used to educate the school's community about the appropriate and inappropriate uses of copyrighted materials, as well as about the legal alternatives available for downloading or otherwise acquiring copyrighted materials. Include any disciplinary actions taken against individuals who engage in unauthorized distribution of copyrighted materials. Also detail your school's policies related to unauthorized peer-to-peer file sharing, including any disciplinary actions taken against students who engage in such activity.

You may wish to cross-reference the copyright infringement and peer-to-peer file sharing disclosures in the consumer information section of the manual.

Response:

Academic Honesty:

Resources:

668.14(b)(30)
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024

Academic dishonesty is a violation of the Standards of Student Conduct (Board Policy 5500). The college has the responsibility to ensure that grades assigned are indicative of the knowledge and skill level of each student. Acts of academic dishonesty make it impossible to fulfill this responsibility.

Academic dishonesty includes, but is not limited to, cheating, plagiarism, collusion, and misuse of college computers and software.

COPYRIGHT AND PIRACY POLICY

The district supports the Higher Education Opportunity Act and Digital Millennium Copyright Act, which outlines efforts to eliminate the illegal distribution of copyrighted material. Under the law, college administrators may be obligated to provide copyright holders with information about users of the district's information network who have violated the law. Accordingly, students are prohibited from using the information network to illegally download and/or share music, video, and all other copyrighted intellectual property. Illegal forms of downloading and file sharing as well as the unauthorized distribution of copyrighted materials are violations of the law and may subject offenders to academic sanctions from the college as well as criminal and civil penalties, including a lawsuit brought by the Recording Industry Association of America (RIAA). In addition to being illegal, file sharing drains the district's network bandwidth, which slows computer connections for students and employees who are using the network for legitimate academic purposes and creates an unnecessary financial burden to the College. Board Policy 3710 and Administrative Procedure 3710 Intellectual Property and Copyright are policies with consequences to ensure that students effectively use the information network and respect music and other forms of intellectual property as we

Procedures

Describe your school's procedures for detecting copyright and peer-to-peer file sharing violations and how your school handles unauthorized distribution of copyrighted materials and peer-to-peer file sharing, including any disciplinary procedures related to each type of violation. Also describe your school's procedures for periodically reviewing the effectiveness of these measures.

Include details on how your school consults with its information technology officer(s) or other designated officials to periodically review and offer legal alternatives for downloading or otherwise acquiring copyrighted materials.

Response:

Academic Honesty:

Disciplinary actions may include an oral reprimand, a failing grade on all or part of a particular paper, project, or examination, or the assignment of an "F" grade in cases where the dishonesty is more serious, premeditated, or a repeat offense. Serious or repeated offenses may also result in suspension from the college.

The academic honesty procedure was developed by the Merced College Academic Senate and is administered by the office of the vice president of student services (Administrative Procedure 5540). Copies are available from the office of student services

COPYRIGHT AND PIRACY POLICY

The district has developed policies with consequences to ensure that students effectively use the information network and respect music and other forms of intellectual property as well as conduct responsible use of the internet. These policies are available from the president's office or from the learning resources center.

3.2 General Title IV Student Eligibility Requirements

Note:


NASFAA Monograph, Satisfactory Academic Progress, gives comprehensive satisfactory academic progress (SAP) guidance, including a SAP checklist and sample SAP policies. It is located on the NASFAA website at https://www.nasfaa.org/. Select Tools & Resources, Publications, and then Monographs.


Schools should designate one or more individuals to monitor policies and procedures of other offices which may impact student eligibility and coordinate with those responsible individuals or

offices to ensure Title IV compliance. Email groups or listservs including responsible individuals might be a good practice on your campus.

Policies

Describe the general student eligibility criteria. The student must:

- Be enrolled as a regular student in an eligible program
-  Be enrolled in an eligible Prison Education Program (PEP)
- 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 first enrolled prior to July 1, 2012, the school must document the student's qualifying enrollment and the student's successful completion of one of the following ability-to-benefit (ATB) alternatives:
    - Have a passing score on an independently administered, ED-approved ATB test
    - Complete at least six 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
  - For students first enrolled on or after July 1, 2012, the ATB alternative are available *only* if the student also is enrolled in an eligible career pathway program. The school must document the student's qualifying enrollment and the successful completion of one of the ATB alternatives
  - 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
- 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)

Resources:

668.20
2024-25 FSA Handbook, Vol. 1, Ch. 3, February 2024
2024-25 FSA Handbook, Vol. 1, February 2024
2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024
668.32(a)-(b)
668, Subpart P
Federal Register, 10/28/22, pp. 65429 to 65444
GEN-16-09
668.32(e)
GEN-14-06
GEN-15-09
600.2, Recognized equivalent of a high school diploma; Regular student
GEN-12-03
P.L. 114-113, Sec. 313
668.32(e)(2)-(5)
668.156
668.32
Federal Register, 10/31/23, pp.74568 to 74710
668.2
668.157(b)
Electronic Announcement, 4/9/24 (GE-24-03)
668.32(i)
668.36
2024-25 FSA Handbook, Vol. 2, Ch. 2, August 2024
668.32(d)
668.33
668 Subpart I
668.32(h)
668.32(g)(1)-(4)
668.35(a)-(h)
668.34
668.32(f)
668.32(m)
668.32(n)
668.231(a)
668.233(a)
GEN-11-01
668.5
668.39
668.38
GEN-01-09
GEN-12-09

- 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
- 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

If your institution enrolls students in a comprehensive transition and postsecondary program for students with intellectual disabilities, describe the eligibility criteria for students enrolled in such a program. Enrolled students must meet all of the general student eligibility criteria noted above except the student:

- Does not have to be enrolled for the purpose of obtaining a degree or certificate
- Is not required to have a high school diploma, a recognized equivalent of a high school diploma, or have passed an ATB test
- Must be making satisfactory progress according to the institution's published standards for students enrolled in its comprehensive transition and postsecondary programs

Be sure to include any other areas that require special consideration and may impact student eligibility, such as:

- Admissions policies for conditional admission students, early admission students, students admitted under ATB provisions, international students, nonresident students, etc.
- Enrollment policies which impact the Title IV programs, such as determining registration status, enrollment tracking, etc.
- Multi-institutional agreements, such as consortium/contractual agreements, study abroad, etc.
- Enrollment in remedial courses, correspondence courses, preparatory coursework, and teacher certification coursework
- Transfer student academic transcript evaluations, financial aid history, satisfactory academic progress, etc.

Stipulate any exceptions which are made to admissions policies and explain why these exceptions are made.

Response:

General Title IV Student Eligibility Requirements for Federal aid:

To be considered eligible for and receive Title IV aid in the MCCD, a student must meet the following specific requirements:

- Be a U.S. citizen or eligible non-citizen,
- Be a “regular student,” enrolled in an eligible program that leads to a degree, certificate, or a degree with a transfer program,
- Not be enrolled simultaneously in elementary or secondary school,
- Have a valid Social Security Number,
- 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, and
- Be making satisfactory academic progress (SAP).

A regular student must meet one of the following academic criteria:

- Have a high school diploma or its recognized equivalent (e.g., GED),
- Have a passing score on an approved California Community Colleges ability-to-benefit (ATB) state

process which enables adults without a high school diploma or GED to access federal financial aid through Eligible Career Pathway Programs (ECPP),

- Be home schooled and obtain a secondary school completion credential for home schooling provided by the state of California.

General Title IV Student Eligibility Requirements for state of California aid:

To be eligible for state of California grants, students must also:

- Be a resident of California and have financial need based on the criteria for the California College Promise Grant or Cal Grant Programs.

Procedures

Describe the procedures and documentation requirements associated with each student eligibility criterion listed under the *Policies* section above (e.g., citizenship status or Social Security Number, etc.). If your institution offers a comprehensive transition and postsecondary program for students with intellectual disabilities, note the exceptions to the criteria.

As some student eligibility criteria may be listed in a separate section of the manual, such as File Review and Verification or SAP, you may wish to cross-reference these sections. You might cross-reference program eligibility and the resolution of C-code sections of your manual. Moreover, since the resolution of many student eligibility issues requires the collection of documentation, you may wish to cross-reference the forms and document collection and tracking sections as well.

Procedures related to other criteria might include an explanation of how the financial aid office determines a financial aid applicant has been admitted as a regular student and how to determine whether the academic credential criterion is met.

Describe the use of NSLDS to check financial aid histories and include an explanation of the procedures which result from prescreening and postscreening of application data.

Response:

It is the responsibility of the FAC to be sure students have met all the eligibility criteria prior to awarding financial aid.

3.3 Federal Financial Aid Programs in Which Institution Participates

There are various approaches that may be used to structure this part of your manual. One approach is to list each federal financial aid program in which you participate and include one general category of policies and procedures with general student eligibility requirements, student selection requirements, minimum and maximum packaged amounts including aggregate maximum amounts, disbursement schedules, reporting requirements, and the various offices that participate in the operation of the financial aid program.

Another approach is to establish separate policies and procedures under each program. Under this approach, each bullet listed below would become a subsection under each program; the subsection number is shown in brackets. For example, the first bullet shows program-specific application process [3.3.x.1]. In your policy outline, the "x" would be replaced with the last digit of the program heading. If the **Federal Work-Study (FWS) Program** section were first, its heading would be 3.3.1. The subsection addressing the **Program Application Process** would be labeled **3.3."1".1**, where "x" has been replaced with the last digit of the FWS section number.

Policies

Describe each financial aid program in which your school participates. Include information regarding:

- Program-specific application processes, such as master promissory notes (MPNs) for Direct Loans [3.1.x.1]
- Program-specific student eligibility requirements, such as students with baccalaureate degrees are ineligible for Federal Supplemental Educational Opportunity Grant (FSEOG) [3.3.x.2]
- Student selection requirements (e.g., define exceptional financial need for FSEOG recipients) [3.3.x.3]
- Minimum and maximum amounts, including aggregate maximum amounts, if any (e.g., the FSEOG Program has an annual minimum amount of $100, and annual maximum of $4,000, and no

aggregate maximum amount) [3.3.x.4]

- Disbursement schedules, including schedules for special student groups, such as correspondence students, students in study abroad programs, etc. [3.3.x.5]
- Program-specific reporting requirements (You may wish to cross-reference the reporting section of the manual.) [3.3.x.6]
- Which offices participate in the operation of the program (e.g., if the campus OneStop office collects verification documents) [3.3.x.7]

Response:

The Merced Community College District participates in at least five Title IV Programs:

- Federal Pell Grant Program
- Federal Supplemental Educational Opportunity Grant (FSEOG)
- Federal Work Study
- Federal Direct Loans
- Bureau of Indian Affairs (BIA) (Native American Students Only)
- Veteran's benefits

The Merced Community College District also participates in the State Cal Grant Program. AmeriCorps Program, CHAFEE Grant, OSHER and other scholarships that are made available through local and business organizations, community service organizations, employers, foundations, and any number of other sources.

The MCCD participates in the following Federal Programs:

Federal Pell Grant: The award amount is based on a federal formula according to need and enrollment status. MCCD uses Formula 1 for Pell Grants. The Federal Pell Grant is available to students who are pursuing their first undergraduate degree. Students must meet the student aid index (SAI) or federal poverty levels and family size requirements to be eligible for this grant. The grant amount is based on the student's SAI and number of credit hours the student is enrolled in. Students must meet satisfactory academic progress standards and have not met the Federal Pell Grant Lifetime Eligibility Usage (LEU) limit of 600%. The maximum yearly award is $7,395 for the 2025-2026 award year.

Federal Supplemental Educational Opportunity Grant (FSEOG): FSEOG is a grant offered to undergraduates who demonstrate exceptional financial need and are enrolled full-time. Since funding for this grant is limited, priority is given to students who apply by the March 2nd priority filing date. The annual award is $800.

Federal Work-Study (FWS): FWS is a federal need-based program administered by the financial aid office. Funding is limited and offered on a first-come, first-served basis. The program provides part-time jobs for undergraduate students with financial need, allowing them to earn money to help pay education expenses. The program encourages community service work and work related to the student's course of study.

Federal Subsidized and Unsubsidized Direct Loans: The MCCD participates in the Federal Direct Subsidized and Unsubsidized Loan programs to give students the full range of options available for paying for college. These federal loan programs offer a secure, government-regulated, and reasonably affordable way for students to invest in their goal of higher education.

Federal Parent Direct PLUS Loans: The MCCD does not offer Parent PLUS loans.

Annual Federal Direct Loan Limits

Grade Level	Dependent	Independent	Subsidized Max

Freshman (0-30 units)	$5,500	$9,500	$3,500
Sophomore (31-59 units)	$6,500	$10,500	$4,500

Aggregate Federal Direct Loan Limits for Undergraduates

	Dependent	Independent
Subsidized	$23,000	$23,000
Subsidized/Unsubsidized Combined	$31,000	$57,500

Procedures

Describe the school's procedures for complying with criteria for each federal aid program. Include, at minimum, the following information:

- Detailed steps for the processing of each program-specific application (e.g., MPNs for Direct Loans) [3.3.x.1]
- Detailed steps followed to ensure program-specific student eligibility requirements are met [3.3.x.2]
- Explanation of how student selection requirements are monitored [3.3.x.3]
- Explanation of how minimum and maximum amounts, including aggregate maximum amounts, if any, are monitored [3.3.x.4]
- Description of the disbursement schedules for the program, including schedules for special student groups, such as subscription-based students, students in study abroad programs, etc. [3.3.x.5]
- Detailed steps for meeting program-specific reporting requirements (You may want to cross-reference the reporting section of the manual.) [3.3.x.6]
- List of all the offices that participate in the operation of the program, including a description of each office's responsibilities [3.3.x.7]

Response:

Federal Pell Grant, FSEOG and FWS: The first step in determining a student's eligibility for Federal Pell Grant, FSEOG and FWS is by the completion of the FAFSA.

Federal Subsidized and Unsubsidized Loans: To apply for a Federal Direct Loan a student must do the following:

- From the student's MCCD student email, the student must send a request to the financial aid office, including their name and student ID number,
- Student applicants must have a completed financial aid file with no outstanding tasks,
- Be making satisfactory academic progress (SAP),
- Must be enrolled in a minimum of six units of non-remedial/non-ESL coursework,

The financial aid office will review the student's file to ensure they meet the above criteria and are eligible. If the student meets the eligibility requirements, an email will be sent to the student to complete the Merced College Financial Aid Direct Loan Questionnaire along with instructions how to complete the master promissory note (MPN) and the loan entrance counseling.

3.3.1 Federal Work-Study Program

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 and encourages students receiving FWS assistance to participate in community service activities.

Resources:

675.1(a)

Best Practices for Equity

Provisions of the FWS Program may be seen as subjective as many times students may be offered an allocation and not use the funds, or offered and not aware of the program, or perhaps offered funds based on the FAFSA question not knowing what it meant. To eliminate any confusion and to provide equity the following is recommended:

• Automatic packaging should be the standard to all eligible students.

• Develop a policy which allows you to offer FWS to those who are admitted late or late completing the FAFSA (consider resource and knowledge inequities).

• Consistent student outreach to inform eligible populations of the availability of FWS funds and deadlines.

• Coordinate with appropriate offices to ensure job placement and interview processes have equity requirements based on student experience for equal opportunity.

• Develop priority deadlines that encourage productivity but are not punitive, so that exceptions can be made.

• Provide flexibility to first-time freshmen to consider the unknown.

• Ensure job postings use inclusive language so as not to alienate populations.

• Consider using FWS funds to create positions such as tutors, ambassadors, and academic services to assist with outreach efforts proactively.

Policies

Describe your school's policies regarding the administration of the FWS Program. State your policy to:

- Make employment under FWS reasonably available, to the extent of available funds, to all eligible students
- Provide FWS employment that will, to the maximum extent practicable, complement and reinforce the educational program or career goals of each student receiving assistance under the FWS Program
- Assure FWS employment may be used to support programs for supportive services to students with disabilities
- Inform all eligible students of the opportunity to perform community services
- Consult with local nonprofit, governmental, and community-based organizations to identify community service opportunities

Response:

The student employment program at the MCCD is designed to provide work experience in a vocational or academic field, as closely related to the student's major as possible. The FWS provides employment opportunities for students who submitted a Free Application for Federal Student Aid (FAFSA) and have demonstrated financial need. The purpose of this federally funded program is to enable students to earn a portion of their educational expenses.

- Students will be paid only for time worked regardless of award allocation. They cannot work past their allotted hours and/or awarded amount.
- A student cannot hold more than one FWS job at a time. Also, a student cannot hold a FWS job and a non-FWS (general fund) job within the MCCD at the same time. These guidelines may not be changed unless at the discretion of the DFA.
- Students must be enrolled as a full-time student and working toward completion of a program of study at the MCCD.

Eligibility:

To be determined eligible for a FWS position, a student must meet the following requirements:

- Demonstrate financial need based on family financial information submitted on the Free Application for Federal Student Aid (FAFSA) for the current year, and all other forms required by the Merced College Financial Aid Office. All required forms and documents must be submitted on time;

Resources:

675.8(c)-(f)
GEN-23-01

deadlines are established by the Merced College Financial Aid Office. Late submission may delay the student's hire date.

- Be continuously enrolled as a full-time student (12 units or at least 6 units with a Disabled Student Services exception). If the student drops below 6 units, their position will be terminated. Only those students who are enrolled are eligible to participate in the FWS program during the fall/spring term.
- Meet the MCCD's financial aid SAP standards. Any student who goes on financial aid disqualification will be disqualified from FWS employment.
- Be a citizen, immigrant, refugee, or a permanent resident alien of the United States.
- Have a valid driver's license or California ID.

To be determined eligible for general fund position, a student must meet the following requirements:

- Be continuously enrolled as a full-time student (12 units) during a regular semester (Fall/Spring) and at least one academic course (minimum 3 units) during a summer semester. If the student drops below the required unit level, their position will be terminated. Only those students who are enrolled are eligible to participate in a general fund position.
- Be a citizen, immigrant, refugee, permanent resident alien or have a social security card and authorization to work in the United States.
- Have a valid driver's license or California ID.

Procedures

Describe the process of identifying eligible FWS applicants. Explain how the school:

- Determines minimum and maximum FWS offer amounts
- Packages FWS offers
- Ensures each student does not receive a FWS offer exceeding the student's demonstrated financial need
- Monitors FWS earnings
- Works with other campus offices that participate in the operation of the FWS Program
- Identifies community service jobs, including reading and math tutoring jobs

Resources:

675.9
675.10
2024-25 FSA Handbook, Vol. 6, Ch. 2, June 2024
673.5(a)(2)
675.2(b), Community Services
675.8(f)

Response:

Students are responsible for finding employment on or off campus through the MCCD website where students can view open positions and apply for FWS positions. Once the student is hired and the application is received, the FAC that handles FWS will review and determine if the student meets the qualifications for FWS. The FAC will reach out to the student regarding the next steps. An award is the maximum amount that the student may earn during the specified award period. Awards are subject to revision, increase, or decrease because of changes to a student's situation and/or funding availability.

3.3.1.1 General Employment Conditions & Limitations

Policies

Explain your policies for enforcing the conditions and limitations of the FWS Program under which students may be employed by the school; a federal, state, or local public agency; a private nonprofit organization; or a private for-profit organization.

Resources:

675.20(a)-(c)
2024-25 FSA Handbook, Vol. 6, Ch. 2, June 2024

Response:

See Section 3.3.1 Federal Work Study Programs

For more information, please see the 2025-2026 Student Employment Handbook.

Procedures

Describe the process of identifying eligible on-campus and off-campus employers for the FWS Program, including community service jobs. Describe how you will determine whether a job also carries academic credit. List all documentation and forms used. Include information on all offices involved and assigned responsibilities. You may wish to cross-reference other appropriate sections

Resources:

GEN-22-05
2024-25 FSA Handbook, Vol. 6, Ch. 2, June 2024

of the manual and include copies of FWS forms in the forms section of the appendix.

Response:

See Section 3.3.1 Federal Work Study Programs

For more information, please see the 2025-2026 Student Employment Handbook.

3.3.1.2 Federal Share Limitations

Policies

State the school's policies for determining the federal share of FWS wages paid to a student when work is performed for the school; federal, state, or local public agencies; private nonprofit organizations; private for-profit employers; or community service employers. Describe the school's policies for the use of the federal share for tutoring and family literacy jobs as well as jobs in the field of emergency preparedness and response. State your policies for using institutional resources to pay the nonfederal share of a student's FWS wages.

Response:

Seven percent of the school's federal authorization must be used in a community service position. Of the seven percent, at least one student must be placed in a reading tutor or family literacy position.

Procedures

Identify federal and nonfederal restrictions and requirements for payment of the federal share of FWS wages. Identify the process for tracking federal and nonfederal payment of FWS wages for students employed in tutoring and family literacy jobs.

Response:

Outside employers are vetted before any contract or hiring can take place. Contracts are created for each position, and earnings are tracked within our payroll system. Positions are monitored to make sure the MCCD meets all requirements. Contracts are also submitted to our annual audit for review.

Resources:

675.26
675.27
2024-25 FSA Handbook, Vol. 6, Ch. 2, June 2024
2024-25 FSA Handbook, Vol. 6, Ch. 1, June 2024

3.3.1.3 Fiscal Procedures & Recordkeeping

Policies

State your policies for establishing and maintaining an internal control system of checks and balances that ensures no office can both authorize payments and disburse funds to students. The institution must reconcile expenditures in the FWS Program and must meet reporting requirements, which includes reporting to COD using the campus-based schema. Describe your policy for FWS records management and retention.

Response:

See Section 3.3.1 Federal Work Study Program and Section 3.3.1.1 General Employment Conditions & Limitations.

Procedures

Describe the responsibilities of other institutional offices as they relate to the administration of the FWS Program with respect to the:

- Approval and disbursement of FWS funds
- Preparation and submission of reports to ED

List all the offices involved in FWS records management and retention. Describe each office's responsibilities. Include information regarding record retention time frames. You may wish to cross-reference the records management and retention and disbursement sections of your manual.

Response:

The financial aid technician (FAT) and our fiscal payroll office review and reconcile payments monthly. The FAT makes sure students are eligible with enough unmet need and will monitor earnings so that they do not go over their need, in addition to verifying unit and SAP requirements to maintain the position.

Fund Maintenance: There is a separate account for the FWS program used to record and maintain the student's monthly gross earnings. The awards from and refunds to the fund is identified per

Resources:

668.16(i)
Electronic Announcement, 7/21/23 (CB-23-13)
675.19
2025-26 COD Technical Reference, Vol. 4
2024-25 FSA Handbook, Vol. 6, Ch. 1, June 2024

student, rather than in lump sum amounts

3.3.1.4 Job Location and Development Program

Policies

Describe your school's policies regarding the administration of the Job Location and Development (JLD) Program. Explain:

- The use of JLD funds to establish and administer the JLD Program
- Allowable costs to administer the JLD Program and the use of FWS funds to pay up to 80 percent of the allowable costs
- Staffing a JLD Program office
- Reporting JLD expenditures on the FISAP
- Written agreements between your school and other eligible schools to establish and operate a JLD Program

Resources:

675, Subpart B
675.32
675.33
2024-25 FSA Handbook, Vol. 6, Ch. 2, June 2024
675.19
675.36
675.34

Response:

At MCCD, the JLD program is a part of the FWS program. MCCD can use part of the federal funds it receives under the FWS program to establish or expand a JLD program. The JLD program locates and develops off-campus job opportunities for students who are currently enrolled and want a job regardless of financial need. This means that jobs may be located and developed under the JLD program for FWS and non-FWS eligible students.

Under the JLD program, MCCD must locate and develop off-campus jobs that are suitable to the scheduling and other needs of the employed student and must, to the maximum extent practicable, complement and reinforce the educational program or vocational goal of

the student. JLD jobs may be part-time or full-time, for either a for-profit or a non-profit employer.

When establishing or expanding a program to locate and develop off-campus jobs, including community service jobs, MCCD may use up to the lesser of 10% of its FWS allocation and reallocation, or $75,000. Every year it is the same amount of $46,454.

Allowable costs to administer the JLD program and the use of FWS funds to pay up to 80% of the allowable costs include:

- Staff salaries and benefits, if they are the same as those paid to other institutional employees in comparable positions and are not paid to a student employed through the FWS Program,
- Partial salaries and benefits for the staff person that reports the expenditures on the FISAP,
- Travel expenses related to JLD activities,
- Printing and mailing costs for brochures about the JLD Program,
- JLD telephone charges, including installation of a separate line for off-campus employers,
- JLD costs for supplies, equipment, and furniture,
- JDL costs for newspaper or other types of advertising that inform potential employers of the services that the JLD program offers, and
- JLD workshops for students and employers.

Costs that are not allowable are costs related to purchasing, constructing, or altering the facilities that house a JLD project. Indirect administrative costs are also not allowed. One example of an indirect administrative cost is a portion of the salary of someone who is not directly involved in the program, such as the JLD director’s supervisor. Other examples of indirect administrative costs are lighting, heating, or custodial costs incurred as part of the normal operations of the facility in which the JLD program is administered. At MCCD, this would be the financial aid office or the career and transfer center.

Procedures

Describe the process of identifying students seeking off-campus employment. Explain how the school will locate and develop off-campus jobs and which individuals or offices are responsible for doing so.

Response:

The 10% JLD is provided to the career and transfer center to meet the needs of the program.

- Job placement: Stats were comprised based on total number of jobs, hourly wages for a 6-hour period and then multiplied by 12 months to get yearly wages and totals.
- Formula: Total number of jobs, wages, 6-hour period, 12 months.
- The institutional share (matching contribution) and allowable costs of JLD (e.g., staff, supplies, travel) must comply with limits set by federal guidance. MCCD uses it for employee share to develop jobs and advertise jobs; EAB Navigate, and Eureka.
- To their best ability, MCCD is meeting the FWS FISAP requirements of keeping current job descriptions; selection documentation, aligned majors/programs of study, and dates for off-campus jobs.
- Jobs are open to all students, regardless of FWS eligibility.
- The back-up data (an excel spreadsheet with job descriptions) has evidence of MCCD trying to reinforce students' educational programs. The job posting must select appropriate program of study or guided pathways, school of opportunities.
- Data was retrieved from Jobspeaker, which is used to document data for FWS job location development. Jobs are communicated via Jobspeaker, EAB Navigate (FWS JLD District Match), and students identify applicable skillsets using Eureka.

3.3.2 Second Federal Program (e.g., Federal Pell Grant Program)

The Federal Pell Grant Program is a grant program for postsecondary students who have not yet received a baccalaureate or first professional degree and demonstrate exceptional financial need. Postbaccalaureate students who are enrolled in a teaching certificate or licensing program at an eligible institution may also receive a Federal Pell Grant.

Policies

Describe your institution's policies and procedures regarding the administration of the Federal Pell Grant. Explain:

- Determination of the amount to package a student
- Calculation of the Federal Pell Grant based on the Student Aid Index (SAI), Pell Grant Formula used, Pell cost of attendance, and enrollment intensity
- Calculation of a Federal Pell Grant for a payment period
- Calculation when a payment period occurs in two award years
- Determination of eligibility of the Federal Pell Grant to transfer students who attended another school in the same award year
- Providing Federal Pell Grant for correspondence study, if applicable
- Providing Federal Pell Grant for students in an eligible prison education program (PEP)
- Determination of eligibility for payment
- Frequency of payment
- Recovery of overpayments
- Handling of Pell potential overawards (POP)
- Recalculation of the Federal Pell Grant
- Offering Year-Round Pell

Resources:

690.61
2024-25 FSA Handbook, Vol. 4, Ch. 3, April 2024
2025-26 FSA Handbook, Vol. 3, Ch. 3
2025-26 FSA Handbook, Vol. 7, Ch. 4
2025-26 FSA Handbook, Vol. 7, Ch. 3
690.63
690.64
690.62
2025-26 FSA Handbook, Vol. 7, Ch. 5
690.65
600.2, confined or incarcerated individual
2025-26 FSA Handbook, Vol. 7, Ch. 2
2025-26 FSA Handbook, Vol. 7, Ch. 6
690.66
668.32(c)(2)(ii)
668.236
690.62(b)
2025-26 FSA Handbook, Vol. 7, Ch. 1
690.75
690.76
690.79

- Pell Lifetime Eligibility Used (LEU)
- Students who qualify for the maximum Federal Pell Grant under the Special Rule and Legacy IASG students
- How students obtain books and supplies by the seventh day of a payment period
- Accounting
- Maintenance and record retention
- Report submittal

Response:

The Federal Pell Grant Program is a grant program for postsecondary students who have not yet received a baccalaureate degree and demonstrate exceptional financial need. Eligibility and award amounts are calculated using the FAFSA form, which determines a student aid index (SAI) based on family income, assets, household size, and the number of family members in college. The enrollment intensity will also determine the actual amount of Pell Grant a student is eligible for.

On the FAFSA there is a question regarding any parent who may have lost their life either while on duty in the military after September 11, 2001, or while performing duties as a public safety officer. Rather than receiving an Iraq and Afghanistan Service Grant, the student will receive a maximum Pell Grant award. Eligibility for this type of Pell Grant is as follows:

- The child of a parent or guardian who died in the line of duty while (a) serving on active duty as a member of the Armed Forces on or after September 11, 2001; or (b) actively serving as and performing the duties of a public safety officer; and
- The student was under 24 years old or enrolled in college at least part-time at the time of their parent's or guardian's death.

Procedures

Response:

Federal Pell Grants are considered to be the first source of aid to the student, and packaging FSA funds begins with Pell Grant eligibility. A correctly determined Pell Grant is never adjusted for other forms of aid. Therefore, if a student's aid package exceeds their need, the over-alignment is eliminated by reducing other aid. The Institutional Student Information Record (ISIR) provides the SAI, which is necessary to determine the Pell Grant amount for the award year.

Application for the Pell Grant is made using the FAFSA. Eligibility is based on financial need CSUCI requires all students seeking financial assistance to complete the FAFSA to determine their eligibility for the Pell Grant.

Maximum and minimum Pell Grant eligibility are determined based on tax filing requirements, family size and composition (i.e., single parent or non-single parent), Federal poverty guidelines, and state of residence. If a student qualifies for a maximum Pell Grant, the SAI is not used to determine the amount of that grant. An SAI-calculated Pell Grant is determined by subtracting the student's calculated SAI from the annual published maximum Pell Grant amount, then rounding to the nearest $5. If the SAI calculated Pell Grant is less than the published minimum Pell Grant amount, the student is ineligible for an SAI-calculated Pell Grant. However, the student may still be eligible for a minimum Pell Grant if they meet the minimum Pell Grant eligibility requirements. For additional information please refer to the 2025-26 Student Aid Index (SAI) and Pell Grant Eligibility Guide.

20 U.S. Code Sec. 1070A [HEA Section 401(c)]
690.80
690.67
668.164(m)
2025-26 FSA Handbook, Vol. 7, Ch. 8
20 U.S. Code Sec. 1087mm(b) [HEA 473(b)]
GEN-23-11
Electronic Announcement, 3/15/24 (GRANTS-24-03)
690.81
690.82
668.239
690.83

3.3.3 Reserved

3.3.4 Fourth Federal Program (e.g., Federal Supplemental Educational Opportunity Grant Program)

The Federal Supplemental Educational Opportunity Grant (FSEOG) Program is one of the campus-based programs. Funds for the campus-based programs are generally made up of federal and institutional dollars, however, depending on the school, up to 100 percent of the federal share may be provided to students without an institutional contribution. FSEOG may be provided to undergraduate students of exceptional financial need who have not completed their first

Resources:

2024-25 FSA Handbook, Vol. 6, Ch. 6, June 2024

baccalaureate degree and who are financially in need of this grant to enable them to pursue their education. Priority for FSEOG must be given to Federal Pell Grant recipients with the lowest SAIs.

Policies

Describe your policies and procedures regarding the administration of the FSEOG. Explain:

- Communication of outside resources to the aid office
- Referral of FSEOG overpayments
- Restoration of funds to program account
- Overaward tolerance
- Written notification of overpayment
- Offer amounts
- Payment amount and frequency
- Records reconciliation and retention
- Matching method
- Selection of students

Response:

The Federal Supplemental Educational Opportunity Grant (FSEOG) is a grant offered to undergraduates who demonstrate exceptional financial need and are enrolled in at least half-time status. Since funding for this grant is very limited, priority is given on a first-come, first-serve basis. Students with a valid Institutional Student Information Record (ISIR) will be first priority. The award is $800 annually ($400 per semester). Pell Grant recipients must have a -1,500 SAI to be eligible for FSEOG funds.

- Selected students and awarded students who are below six units will have FSEOG awards cancelled for the term.
- Remaining FSEOG funds will be recycled and awarded to students based on a first-come, first-serve basis.

Procedures

Response:

The financial aid office utilizes the Ellucian Colleague Financial Aid System to automatically award and disburse student aid for the fall, spring, and summer semesters. The FSEOG awards are included as part of this automated process.

The awarding process allocates a portion of the total FSEOG fund allocation to students indicating their intent to enroll in the fall and spring semesters of the academic year. A portion of the allocation is reserved and awarded to students beginning enrollment in the spring semester. Additionally, a re-award process is utilized to reallocate unused funds if students initially awarded do not use all the FSEOG funds awarded to them.

In the event a subsequent ISIR record is received for an FSEOG recipient, which reflects an SAI greater than -1,500, the FSEOG award will be cancelled, and the funds will be removed from the student's account.

Resources:

668.16(b)(3)
673.5(b)
673.5(f)(5)
673.5(f)(2)
676.16(d)
673.5(d)
673.5(f)(4)
676.20(a)-(c)
2024-25 FSA Handbook, Vol. 6, Ch. 1, June 2024
668.24
676.16(a)(1), (2)
676.19(b)(1), (2)
668.22(a)(3)
2024-25 FSA Handbook, Vol. 6, Ch. 6, June 2024
668.32
676.9
676.10
GEN-24-05

3.3.5 Fifth Federal Program (e.g., Teacher Education Assistance for College and Higher Education Grant Program)

The Teacher Education Assistance for College and Higher Education (TEACH) Grant is a federal grant available to undergraduate and graduate students who want to pursue a teaching career in a high-need field. Students must sign an Agreement to Serve or Repay and teach in a school serving low-income students (Title I schools) after graduating. If a recipient does not fulfill the service requirement, funds convert into a Direct Unsubsidized Loan.

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Policies

Describe your policies and procedures regarding the administration of the TEACH Grant, if applicable to your school and student population. Explain:

- Annual amount
- Aggregate amount
- Calculation of the amount for the payment period
- Formula used
- Student Aid Report (SAR) or Institutional Student Application Record (ISIR) deadline
- Recalculation
- Determining eligibility for transfer students
- Use of funds from two Scheduled Awards
- Sequestration
- Counseling requirements
- Loan limit exclusion for converted grants
- Notification requirements and student's right to cancel

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Procedures

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Resources:

686.2(d)
686.21(a)(1),(b)
668.165(a)
686.21(a)(2)
668.23
686.22
2024-25 FSA Handbook, Vol. 9, Ch. 3, July 2024
686.22(b)-(g)
686.20(b)
668.21
686.35
Electronic Announcement, 5/5/25 (GENERAL-25-20)
686.24
686.22(i)
686.32
2024-25 FSA Handbook, Vol. 9, Ch. 1, July 2024
2024-25 FSA Handbook, Vol. 9, Ch. 2, July 2024
685.203(k)
686.43(b)
686.31(e)

3.3.6 Sixth Federal Program (e.g., Federal Direct Student Loan Program)

The Federal Direct Student Loan (Direct Loan) program encompasses the Direct Subsidized, Direct Unsubsidized, Direct PLUS and Direct Consolidation Loan Programs. Typically, institutions opt to break the Direct PLUS Loan into a separate category as it has different criteria than the Direct Subsidized and Direct Unsubsidized loans. Loan funds for these programs are provided by the federal government to students and parents through postsecondary institutions.

Policies

Describe your policies and procedures in regard to the administration of the Direct Loan program. Explain:

- Aggregate loan limits
- Annual loan limits
- Application process
- Borrower eligibility
- Entrance counseling
- Exit counseling
- Loan origination
- Master promissory notes
- PLUS loan counseling
- Reporting

Response:

Federal Subsidized and Unsubsidized Direct Loans: The MCCD participates in the Federal Direct Subsidized and Unsubsidized Loan programs to give students the full range of options available for paying for college. These federal loan programs offer a secure, government-regulated,

Resources:

685.203(d), (e), (g), (i), (k)
2025-26 FSA Handbook, Vol. 8, Ch. 4
685.203(a)-(c), (f), (h)(j)
685.201(a),(b)
2025-26 FSA Handbook, Vol. 8, Ch. 1
685.200
685.309
685.304(a)
2025-26 FSA Handbook, Vol. 8, Ch. 2
685.304(b)
685.301
2025-26 FSA Handbook, Vol. 8, Ch. 3
685.102(b), Master promissory note
685.200(b)(5)
685.200(c)(2)
685.301(c)

and reasonably affordable way for students to invest in their goal of higher education.

Federal Parent Direct PLUS Loans: The MCCD does not offer Parent Direct PLUS loans.

Annual Federal Direct Loan Limits

Grade Level	Dependent	Independent	Max Subsidized Limit
Freshman (0-30 units)	$5,500	$9,500	$3,500
Sophomore (31-59 units)	$6,500	$10,500	$4,500

Aggregate Federal Direct Loan Limits for Undergraduates

	Dependent	Independent
Subsidized	$23,000	$23,000
Subsidized/Unsubsidized Combined	$31,000	$57,500

Procedures

Response:

First-time Direct Loan borrowers are required to complete a student loan entrance counseling requirement and a master promissory note (MPN), before loan funds can be disbursed. The amounts are determined by the student's grade level:

When a student withdraws, drops below half-time enrollment status, stops attending, graduates or completes their program of study; a student loan exit counseling is required.

3.3.7 Seventh Federal Program

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Policies

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Procedures

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

3.4 State Aid Programs in Which Institution Participates

Please refer to the approaches described in the federal aid programs section (Section 3.3).

Policies

Describe each state aid program in which your school participates. Include information regarding:

- Program-specific application policies [3.4.x.1]
- State guidelines for student eligibility (e.g., must be a state resident for five years, must be an undergraduate student, etc.) [3.4.x.2]
- Minimum and maximum amounts, including aggregate maximum amounts, if any [3.4.x.3]
- Student notification process (e.g., state communicates directly with student about eligibility, amounts, disbursement schedules, receipt of funds, etc.) [3.4.x.5]
- Institutional notification process (e.g., how the school is notified of eligible students, amounts, disbursement schedules, receipt of funds, etc.) [3.4.x.5]
- Institutional reporting requirements (e.g., reconciliation reports, report frequency, who is responsible for report completion, etc.) [3.4.x.6]
- What office is responsible for returning funds (e.g., students withdraw and state has a refund policy, funds for no shows, etc.) [3.4.x.7]
- Institutional application for participation in state programs and the frequency of completing such an

application [3.4.x.8]

Response:

The MCCD participates in the following California Grant programs:

- Cal Grant B
- Cal Grant C
- Extended Opportunity Programs and Services (EOPS)
- CARE Program
- Chafee Grant
- California Promise Grant
- MC4Free
- Student Success Completion Grant (SSCG)

Procedures

Describe the school's procedures for complying with criteria for each state aid program. Include, at a minimum, the following information:

- Detailed steps for the processing of each program-specific application [3.4.x.1]
- Detailed steps followed to ensure state guidelines for program-specific student eligibility requirements are met [3.4.x.2]
- Explanation of how minimum and maximum amounts, including aggregate maximum limits, if any, are monitored [3.4.x.3]
- Detailed steps for the institution's responsibilities in the student notification process [3.4.x.4]
- Description of how the institution [3.4.x.5]:
  - Processes notifications of student eligibility and amounts
  - Processes funds received from the state
  - Disburses funds, including disbursement schedules
- Detailed steps for meeting program-specific reporting requirements, including report types, report frequency, who is responsible for report completion, etc. [3.4.x.6]
- Description of the process for returning funds and the office and individuals responsible for the return of the funds [3.4.x.7]
- Step-by-step application procedures for participation in the state program, indicating which offices and personnel are responsible for each step and a submission schedule [3.4.x.8]
- Explanation of how the financial aid office is notified of state aid made to students [3.4.x.9]

Response:

Cal Grant B: Cal Grant B Entitlement and Competitive awards provide up to $1,648 for books and living expenses, for full-time community college students. If a student transfers to an eligible four-year college or university, Cal Grant B also helps pay tuition, fees, and living expenses.

Cal Grant C: The Cal Grant C program provides funding to students pursuing an occupational or technical program. Cal Grant C awards pay up to $1,094 at any California Community College

For the Cal Grant awards, graduating high school seniors must have verification data submitted by their high schools. GPA data can be submitted through Merced College once a student has completed 24-degree applicable units. Reestablished GPAs may be submitted for community college competitive Cal Grant B awards students who have completed 16-degree applicable units. All Merced Colleges submit Cal Grant GPA verification and Cal Grant Enrollment verification through electronic files uploaded to the WebGrants system. A paper GPA verification document may be completed by the college if a student requires an additional GPA factor from a college outside the Merced District. Students must be enrolled at least half-time (6 units) to receive a Cal Grant. Awards for less than full-time (12 units) are prorated based on enrollment status.

Extended Opportunity Programs and Services (EOPS): EOPS is a State of California funded program, which may provide services in the form of grants, books, loans, employment, and other support services to high need, educationally disadvantaged students who are California residents. Students must be enrolled full-time and must complete the FAFSA to apply. The EOPS office determines eligibility. Types and amounts of awards vary depending on the funding available.

CARE Program: The CARE program is a service provided through the EOPS office to assist the single parent student that has a dependent child and receives TANF (cash aid),.The additional services to CARE eligible students include CARE orientation and workshops, CARE grants, meal cards, gas cards, parking permits, and bus passes.

CARE is a program unique to the State of California and the California Community Colleges and exists on campuses statewide. It was established as a supplemental component of EOPS to provide support services and activities for the welfare-dependent, single head of household student population. In concert with the recent Welfare Reforms Legislation, the CARE program works collaboratively with the CalWORKs program. Students can participate both in CARE and CalWORKs and may receive from both programs.

Chafee Grant: Chafee Grant can provide up to $5,000 annually to foster youths and former foster youths to use for vocational school training or college courses. Eligible students (including Dream Act eligible) must have been in foster care between their 16th and 18th birthday and not have reached their 22nd birthday as of July 1st of the award year. Chafee applicants must complete the FAFSA and complete the required verification with the financial aid office. The financial Aid office will transmit a need analysis report through WebGrants for all eligible Chafee Grant students.

California Promise Grant: If you have a California College Promise Grant, you may be able to use it to cover any classes you enroll in via the CVC Exchange. You will first need to re-apply for the California College Promise Grant by visiting the Exchange Profile Class Schedule. Select the pay now button next to your course, and then choose California Promise Grant (CCPG) from the payment options to be directed to the teaching college financial aid application process. As a reminder, the teaching college is the college teaching the course you found on cvc.edu. For the MCCD, the student will need to add the school code (001237) to the FAFSA or Dream Act application. Once downloaded, Merced College will post the California College Promise Grant.

MC4Free: The Mc4Free eligibility is as follows:

- California residents or students who are eligible for AB540, SB68, or SB1141 or SB2000.
- Complete the FAFSA or Dream Act application.
- Enroll in 12 or more units.
- Students must maintain satisfactory academic progress
- Complete the MC4Free Commitment Contract
- AB 1342 (M.Dahle): This bill clarifies that a student who enrolls in community college after having enrolled in community college as a special part- or full-time student or dual enrollment student, is a first time student for purposes of the California College Promise Program upon the student's enrollment in community college after high school graduation. The bill amends Education Code Section 76396.3.

Student Success Completion Grant (SSCG) offers up to $8,000 per year for full-time Cal Grant B or C recipients to encourage on-time completion of a degree or certificate.

3.4.1 First State Program (e.g., State Grant)

Response:

See Section 3.4 State Aid Programs in Which Institution Participates

3.4.2 Second State Program (e.g., State Work-Study)

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

3.4.3 Third State Program (e.g. out-of-state program which can't be used at your school)

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

3.5 Institutional Aid Programs

Please refer to the approaches described in the federal aid programs section (Section 3.3).

Policies

Describe each institutional aid program. Include information about:

- Program-specific application policies [3.5.x.1]
- Student eligibility guidelines [3.5.x.2]
- Minimum and maximum amounts, including aggregate maximum limits, if any [3.5.x.3]
- Student notification (e.g., how the student is informed of aid, disbursement schedules, etc.) [3.5.x.4]
- Institutional reporting requirements (e.g., reconciliation reports, report frequency, who is responsible for report completion, etc.) [3.4.x.5]
- Office responsible for determining eligibility and fund reconciliation [3.5.x.6]
- Information about communications between the financial aid office and the office responsible for making the institutional aid offers (if outside of the financial aid office) [3.5.x.7]

Response:

The MCCD participates in scholarships that are made available through local and business organizations, community service organizations, employers, state foundations, and any number of other sources. Scholarships are usually based on academic achievement, demonstrated leadership, community involvement, need, or a combination of those factors. Each college posts information about its scholarships when application materials or information is made available to the college.

Procedures

Describe the school's procedures for complying with criteria for each institutional aid program. Include, at a minimum, the following information:

- Detailed steps for the processing of each program-specific application [3.5.x.1]
- Detailed steps followed to ensure institutional guidelines for program-specific student eligibility requirements are met [3.5.x.2]
- Explanation of how minimum and maximum amounts, including aggregate maximum limits, if any, are monitored [3.5.x.3]
- Detailed steps for the institution's responsibilities in the student notification process [3.5.x.4]
- Detailed steps for meeting program-specific reporting requirements, including report types, report frequency, who is responsible for report completion, etc. [3.5.x.5]
- Description of the determination of eligibility and how the fund is reconciled, including a list of all the offices involved and a description of each office's responsibilities [3.5.x.6]
- Explanation of how the financial aid office is notified of institutional aid offers made to students (if by an office outside of the financial aid office) [3.5.x.7]

Response:

Students should consult the transfer center, the office of the dean of student services, and the associated student union for information about scholarships. Information on the MCCD Chancellor's Trophy is posted in the student services office at each campus.

For more information, the MCCD provides a Scholarship website.

3.5.1 First Institutional Program (e.g., Dean's Scholarship)

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

3.5.2 Second Institutional Program (e.g., Alumni Loan Program)

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

3.6 Other Aid Programs

Please refer to the approaches described in the federal aid programs section (Section 3.3).

Policies

Describe any other aid programs available, such as Vocational Rehabilitation, Workforce Investment Act (WIA), etc., and information about:

- Program-specific application policies [3.6.x.1]
- Student eligibility guidelines [3.6.x.2]
- Minimum and maximum amounts, including aggregate maximum limits, if any [3.6.x.3]
- Student notification (e.g., how the student is informed of aid, disbursement schedules, etc.) [3.6.x.4]
- Application and/or participation agreement the school must complete (if any) with the outside agency [3.6.x.5]
- School official who is notified about students receiving aid from other programs (if this person is not a financial aid administrator, include information about how the financial aid office is informed about eligible students and amounts) [3.6.x.6]
- Information related to any required reports submitted to the granting-agency/donor, such as reconciliation reports [3.6.x.7]
- The office responsible for receiving and returning funds [3.6.x.8]

Response:

Bureau of Indian Affairs Native American Indian students may receive educational grants from the Federal Bureau of Indian Affairs (BIA).

Procedures

Describe the school's procedures for complying with the criteria for each aid program. Include, at minimum, the following information:

- Detailed steps for the processing of each program-specific application [3.6.x.1]
- Detailed steps followed to ensure guidelines for program-specific student eligibility requirements are met [3.6.x.2]
- Explanation of how minimum and maximum amounts, including aggregate maximum limits, if any, are monitored [3.6.x.3]
- Detailed steps for the institution's responsibilities in the student notification process [3.6.x.4]
- Step-by-step procedures for the application to participate in the program, indicating which offices and personnel are responsible for each step and including a submission schedule [3.6.x.5]
- Designation of the person to be notified when a student receives aid from a program in this category [3.6.x.6]
- Detailed steps for meeting program-specific reporting requirements, including report types, report frequency, individuals responsible for report completion, etc. [3.6.x.7]
- Description of how funds are received and returned, including a list of all offices involved and a description of each office's responsibilities. [3.6.x.8]

Response:

A student must be able to prove that he or she is a member of a federally recognized tribe. BIA requires applicants first to apply for a Federal Pell Grant. Applications for BIA grants for California Tribes are available by writing to the Bureau’s Office, Office Indian Education, 2800 Cottage Way, Sacramento, CA 95825 or by calling 916.978.6000.

3.6.1 First Other Program (e.g., Vocational Rehabilitation program)

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

3.6.2 Second Other Program (e.g., Health and Human Services health professions student aid program)

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

3.X - Reserved for Institutional Use

This section is reserved for any institution-specific area of policies and procedures not covered in previous sections. It may be necessary to include several sub-sections of institution-specific content within this area. If there is no institutional content, simply leave the area blank, or mark the box Complete as preferred.

Response:

Rising Scholars: Our rising scholars program currently collaborates with Valley State Prison (VSP), Central California Women's Facility (CCWF), United States Penitentiary, Atwater (USP) & Juvenile Justice Correctional Complex (JJCC) to expand opportunities and to build strong pathways from incarceration to academia. We understand that students who have experienced the criminal justice system can face significant barriers to academic and career success. We strive to eliminate these barriers and are dedicated to opening opportunities and academic achievement for those who have been system impacted.

Rising Scholars Program Services:

- Academic counseling with a counselor who has specialized experience working with system impacted students.
- Referral to campus and community resources.
- Assistance navigating Financial Aid.
- Private computer lab, free campus printing, and school supplies.
- Transportation and meal assistance as needed.
- Textbook assistance as needed.
- Skills building workshops, events, and field trips.
- A Rising Scholars Program stole at graduation.

On campus we serve formerly incarcerated, and systems impacted students.

Merced College Rising Scholars Office:

Bizzini Interdisciplinary Academic Center: IAC Building B - Rising Scholars Travis Hicks – Dean of Rising Scholars 209.381.6489.

Merced College

Valley State Prison (VSP)

Classes are held at Valley State Prison; Chowchilla, CA

Central California Women's Facility (CCWF) – CDCR

Classes are held at Central California Women's Facility; Chowchilla, CA.

Iris Garrett Juvenile Justice Correctional Complex (JJCC)

Classes are held online at Merced College and in person at Iris Garrett Juvenile Justice

Correctional Complex, Merced, CA.

United States Penitentiary, Atwater (USP)

Classes are held at USP via Webex and in person at Camp in United States Penitentiary, Atwater, CA.

Section 4: Institutional Requirements Relating to Educational Loans

4.1 Private Education Loan Disclosures

Policies

If the institution or any of its institution-affiliated organizations provides information regarding a private education loan from a lender to a prospective borrower, the institution or institution-affiliated organization also must provide the following disclosures regardless of whether a preferred-lender arrangement exists:

- Information required under section 128(e)(11) of the Truth in Lending Act (TILA) for private education loans
- The borrower may qualify for loans or other assistance under Title IV programs
- The terms and conditions of loans under the Title IV programs may be more favorable than those of private education loans

The financial aid office staff should be aware of institutional policies and practices for providing information about private education information to prospective borrowers. Identify any administrative office, academic office, and institution-affiliated organization that provides information about private education loans. State your institution's policies for providing information about private education loans to prospective borrowers.

Response:

Not applicable for the Merced Community College District (MCCD) financial aid offices.

Procedures

Explain how institutional offices and institution-affiliated organizations are made aware of the disclosure requirements. Describe procedures for making the required disclosures, when they must be made, and in what format. Identify who is responsible for ensuring the information about private education loans is presented distinctly from information about Title IV loans, monitoring any change in the disclosure requirements, updating the disclosure information as needed, and making the disclosure information available to each institutional office and institution-affiliated organization. If another office is responsible, you may want to cross-reference that office's policies and procedures.

Response:

Not applicable for the Merced Community College District (MCCD) financial aid offices.

Resources:

601.11(a-c)
601.2(b), Institution affiliated-organization and Private education loan
Federal Register, 8/14/09, pp. 41194 to 41257
Federal Register, 10/28/09, p. 55628
Electronic Announcement, 3/2/22 (GENERAL-22-12)
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024

4.2 Preferred Lender Arrangements

Policies

If an institution or any of its institution-affiliated organizations has a preferred lender arrangement with private education loan lenders, the institution or institution-affiliated organization must:

- Annually compile and maintain a preferred lender list of private education loan lenders, and make the list available to students attending the institution and their families
- Provide certain disclosures related to education loans and each loan offered pursuant to a preferred lender arrangements
- Submit an annual report about its preferred lender arrangements to the U.S. Department of Education (ED)

  Note: NASFAA confirmed with ED the preferred lender arrangement annual report has not been implemented.

- Comply with regulatory requirements regarding the use of the lender's name as well as the institution's name and institutional identifiers in the marketing of private education loans

In addition, the institution must develop, publish, and enforce a preferred lender code of conduct prohibiting a conflict of interest.

State your institution's policies regarding preferred lender arrangements with private education loan lenders. Explain how all institutional offices and departments, as well as institution-affiliated

Resources:

601.10(a)-(d)
601.2(b), Education loan and Preferred Lender arrangement
601.21
Federal Register, 10/28/09, pp. 55628 to 55629
601.12
601.20
668.14(b)(28)
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024

organizations, are made aware of this policy. Identify who has the authority to enter into a preferred lender arrangement with a private education loan lender.

Identify all private education loan lenders with which the institution or any institution-affiliated organization has a preferred lender arrangement.

Response:

Not applicable for the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe your institution's procedures for entering into a preferred lender arrangement with a private education loan lender.

Response:

Not applicable for the Merced Community College District (MCCD) financial aid offices.

4.2.1 Preferred Lender Lists

Policies

If the institution or any of its institution-affiliated organizations participates in a preferred lender arrangement, state your institution's policies for compiling a preferred lender list and making the list and accompanying disclosures available to students attending the institution and their families. Describe each of the criteria the institution uses in establishing a preferred lender arrangement.

Response:

Not applicable for the Merced Community College District (MCCD) financial aid offices.

Resources:

601.10(d)
668.14(b)(28)
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024

Procedures

Describe the procedures for compiling the institution's preferred lender list, including the method used to select the private education loan lenders and how the institution ensures there are not less than two lenders that are not an affiliate of any other lender listed. Explain how the institution informs students and their families about the list and makes it available. If another office is responsible, you may want to cross-reference that office's policies and procedures.

Describe how the financial aid office ensures it does not deny or unnecessarily delay the processing of a private education loan from a lender not on the institution's preferred lender list.

Response:

Not applicable for the Merced Community College District (MCCD) financial aid offices.

4.2.2 Preferred Lender Arrangement Disclosures

Policies

If the institution or any of its institution-affiliated organizations participates in a preferred lender arrangement, it must disclose on its website and in all informational materials that describe or discuss education loans:

- The maximum Title IV grant and loan aid available
- The information identified on the ED-developed model disclosure form for each type of education loan offered pursuant to a preferred lender arrangement

Note: NASFAA confirmed with ED the model disclosure form has not been implemented yet.

Resources:

601.10(a)(1)
601.10(a)(2)
601.10(b)
601.10(c)
601.20
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024

There are additional disclosures the institution or institution-affiliated organization must provide for each type of private education loan offered pursuant to a preferred lender arrangement. The additional disclosures must be provided on the institution's or institution-affiliated organization's website and in all informational materials that discuss or describe private education loans. The institution must disclose information required under section 128(e)(11) of TILA, and the institution-affiliated organization must disclose information required under section 128(e)(1) of TILA.

State your institution's policies for providing the required disclosures annually to students and their families in a manner that allows them to take the information into account before selecting a lender or applying for an education loan.

Response:

Not applicable for the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe procedures for making the required disclosures, when they are made, and in what format(s). Identify who is responsible for ensuring the information about Title IV loan and grant maximums is presented in an easy to understand format, monitoring any change in the disclosure requirements, updating the disclosure information as needed, and making the disclosure information available to each institutional office and institution-affiliated organization. If another office is responsible, you may want to cross-reference that office's policies and procedures.

Response:

Not applicable for the Merced Community College District (MCCD) financial aid offices.

4.2.3 Preferred Lender Arrangement Annual Report

[Note: At the time this section of the Manual was finalized, ED had not established a due date for the report or to whom the report should be sent. Watch NASFAA's Today's News for updated information about the report's due date and to whom it must be sent.]

Policies

If the institution or any of its institution-affiliated organizations participates in a preferred lender arrangement, state your school's policies for providing the annual report to current and prospective students and their families, and for making the report available to the public.

Resources:

601.20

Response:

Not applicable for the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe procedures for preparing the report, submitting it to ED, providing it to students and their parents, and making it available to the public. Identify who has responsibilities for the report. If another office is responsible for the report, you may want to cross-reference that office's policies and procedures.

Response:

Not applicable for the Merced Community College District (MCCD) financial aid offices.

4.2.4 Marketing of Private Education Loans

Policies

If the institution or any institution-affiliated organization participates in a preferred lender arrangement, state your institution's policy for use of its name, emblem, mascot, logo, and other institutional identifiers by individuals or entities not a part of or affiliated with the institution.

Resources:

601.2(b)
601.12
Electronic Announcement, 3/2/22 (GENERAL-22-12)
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024

Note: Income Share Agreements used to finance a student's postsecondary education are considered private education loans and therefore subject to the same required disclosures as private education loans.

Response:

Not applicable for the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe procedures for requesting the use of and using the institution's name, emblem, mascot, logo, and other institutional identifiers by individuals or entities not a part of or affiliated with the institution. Describe procedures for ensuring the lender's name is displayed in all private education loan information and documents in a way that clearly indicates the lender, not the school, offers or makes the loan. If another office is responsible for use of the institution's name and other institutional identifiers, you may want to cross-reference that office's policies and procedures.

Response:

Not applicable for the Merced Community College District (MCCD) financial aid offices.

4.2.5 Preferred Lender Arrangement Code of Conduct

Policies

If the institution or any of its institution-affiliated organizations participates in a preferred lender arrangement, state your code of conduct policies. Identify all personnel of the institution and any institution-affiliated organization as well as others (i.e., the institution's trustees and board of director members) covered by the code. Include policies for administering, publicizing, and enforcing the code of conduct.

Indicate whether the institution has implemented a single code of conduct to address participation in a preferred lender arrangement as well as in a Title IV loan program. See Section 2.2.1.

Response:

Not applicable for the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe procedures for administering, publicizing, and enforcing the code of conduct, including how the institution monitors for and addresses conflicts of interest. If another office is responsible for the code of conduct, you may want to cross-reference that office's policies and procedures.

Response:

Not applicable for the Merced Community College District (MCCD) financial aid offices.

Resources:

601.2(b), Officer
601.21
668.14(b)(27)
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024

4.3 Private Education Loan Applicant Self-Certification Form

Policies

State your institution's policy for providing the Private Education Loan Applicant Self-Certification form and the information needed to complete it.

Response:

The Merced Community College District (MCCD) financial aid offices have an institutional policy that they do not market or advertise private student loans and will not certify a private student loan even if the student submits a Private Education Loan Applicant Self-Certification form.

Procedures

Describe procedures for providing the Private Education Loan Applicant Self-Certification form to private education loan applicants. Identify which office has responsibility for providing it and the information needed to complete the form. If it is not the financial aid office, explain how the responsible office obtains information regarding the student's cost of attendance and estimated financial assistance. (See Section 18.1.)

Response:

Not applicable for the Merced Community College District (MCCD) financial aid offices.

Resources:

601.11(d)
668.14(b)(29)
GEN-13-15
Electronic Announcement, 7/6/23 (GENERAL-23-55)
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024

4.4 Direct Loan Disclosures

Policies

[Note: At the time this section of the Manual was finalized, ED had not yet implemented the model disclosure form for schools participating in the Direct Loan Program. Watch NASFAA's Today's News for updated information about the report's due date and to whom it must be sent.]

If the institution participates in any of the Direct Loan programs, state your school's policies for making information in the model disclosure form available to current and prospective students or their families.

Response:

Not applicable for the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe your school's procedures for making the information in the model disclosure form available and for providing the information when required. If another office is responsible for these requirements, you may want to cross-reference that office's policies and procedures.

Response:

Not applicable for the Merced Community College District (MCCD) financial aid offices.

Resources:

601.30

4.X - Reserved for Institutional Use

This section is reserved for any institution-specific area of policies and procedures not covered in previous sections. It may be necessary to include several sub-sections of institution-specific content within this area. If there is no institutional content, simply leave the area blank, or mark the box Complete as preferred.

Section 5: Student Consumer Information Requirements

5.1 Federal Student Consumer Information Requirements

In addition to requiring institutions to provide student consumer information under a number of categories, federal regulations require institutions annually to notify enrolled students of the types of consumer information it must make available. Policies and procedures related to the annual notification of enrolled students are in subsection 5.1.1, and those related to the categories of information that must be annually disclosed are in subsections 5.1.2 through 5.1.10.

The regulations distinguish information that must be given to enrolled versus prospective students, to current versus prospective employees, to prospective student-athletes, and to parents, coaches, guidance counselors, and the general public. Several of these terms have specific meanings defined in regulation which you may want to list here.

Some of this information must be sent or given to the consumer automatically, and some must be provided only upon request. This may involve offices other than financial aid. The office that produces and maintains the information may not necessarily be the office responsible for disseminating it.

Schools must designate one or more individuals to regularly monitor and coordinate the content and dissemination of consumer information. It is important for the financial aid office to remain in contact with the individuals responsible for keeping this information current.

You may find it helpful to construct a chart for this section of your policies and procedures manual, showing each category of required information and, for each category:

- The office charged with gathering and maintaining it
- The office or individual responsible for disseminating it
- Who must receive it and under what circumstances (i.e., unsolicited or only upon request)
- The method of dissemination
- A calendar showing when information is updated

You may find it sufficient in some of the subsections that follow to cross-reference the policies and procedures of other offices, or to refer to institutional publications.

This section of the template is organized mainly by category of information, on the premise that offices other than financial aid will have primary responsibility for certain categories. Alternately, you could choose to organize it mainly by recipient, showing the information that must be sent to enrolled students, prospective students, current employees, coaches, etc.

You may find it helpful to refer to NASFAA's *Comprehensive List of Consumer Information and Disclosure Requirements*.

Response:

The Merced Community College District (MCCD) is required to provide consumer information under a number of categories. MCCD is also required to notify enrolled students of the types of consumer information it must make available. Prospective and current students may contact the respective office for additional information.

MCCD recognizes that understanding the complexities of financial aid, accurate and timely dissemination of information to consumers is vital. Several policies have been implemented to ensure appropriate dissemination is achieved.

Resources:

34 CFR 668 Subpart D
668.41(a)
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024
668.44

5.1.1 Notice to Enrolled Students

Policies

This subsection of your manual only details those policies and procedures associated with providing the notice to enrolled students. The institution annually must distribute to all enrolled students a notice that lists and briefly describes the following types of consumer information which the institution must make available:

- Financial assistance available to students enrolled at the institution

Resources:

668.41(d)(4)
668.41(d)(3)
668.41(a), Notice, On-campus student housing facility
668.41(d)(1)
668.41(d)(2)

- Institutional information
- Educational programs designed to meet requirements for professional licensure or certification required for employment
- The institution's graduation or completion rate and, if required, its transfer-out rate
- The institution's annual campus security report
- The institution's annual fire safety report, if the institution maintains any on-campus student housing facility
- The institution's athletic program participation and financial support report, if the institution is required to compile this report
- The student's rights under the Family Educational Rights and Privacy Act (FERPA)
- The institution's retention rate as reported to the Integrated Postsecondary Education Data System (IPEDS)
- The institution's placement of, and types of employment obtained by, graduates of the institution's degree or certificate programs
- The types of graduate and professional school education in which graduates of the institution's four-year degree programs enroll, if the institution offers a four-year degree program

The notice must be provided to each student individually and must explain how students may obtain the information.

Response:

Federal regulations mandate that Student Rights and Responsibilities be provided to all enrolled students on an annual basis and to all prospective students. The following is a list of the required disclosures, summary descriptions, and information to obtain a detailed copy of each disclosure.

- Financial assistance available to students enrolled at MCCD
- Institutional information and Annual Report
- Educational programs designed to meet requirements for professional licensure or certification required for employment
- The institution's graduation or completion rate and, if required, its transfer-out rate
- The institution's annual campus security report
- The institution's annual fire safety report if the institution maintains any on-campus student housing facility
  - Not applicable to the Merced Community College District (MCCD) becuse there is no on-campus housing.
- The institution's athletic program participation and financial support report, if the institution is required to compile this report
- The student's rights under the Family Educational Rights and Privacy Act (FERPA) and Privacy of Records.
- The institution's retention rate as reported to the Integrated Postsecondary Education Data System (IPEDS)
- The institution's placement of, and types of employment obtained by, graduates of the institution's degree or certificate programs
- The types of graduate and professional school education in which graduates of the institution's four-year degree programs enroll, if the institution offers a four-year degree program
  - Not applicable to the Merced Community College District (MCCD) because it is a two-year college.

Please Note: Prior to leaving his position of President, Joe Biden signed the Stop Campus Hazing Act into law, which will give institutions several requirements to track and report hazing incidents to campus security or local police on campus. Additional information can be found in the article in

668.41(g)
668.42
668.43
668.45
668.47
668.41(e)
668.41(d)(5)
668.41(d)(6)
668.43(a)(5)(v), (vi)
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024
668.46(b)
668.49(b)
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024
668.41(c)(1)
99.7
668.41(c)

NASFAA Today's News that was sent previously to all institutions. Schools will be required to collect and document statistics on hazing incidents on their campus effective January 1, 2025. Although the reporting piece of this requirement does not take place until October 2026. Schools may need to put procedures in place now to ensure they meet the requirements.

Procedures

When you construct your procedures, be sure to include:

- Who is responsible for providing the notice
- When and in what format the notice is provided
- How students may obtain the consumer information, including the name(s) and contact information of the individual(s) designated full time to assist students in obtaining the consumer information

Response:

Notifications are sent to students and staff every Fall and Spring semester. That way all students who enroll at any time during the academic year will receive the notification. They are sent out via email and/or text messages by the business analyst.

Resources:

668.41(a), Notice
668.41(c)
668.44

5.1.2 Financial Aid Information

Policies

The institution must publish and make readily available to enrolled and prospective students:

- A description of all available financial aid programs (including both need-based and non-need-based programs), and for each of those programs:
  - Procedures and forms required to apply
  - Student eligibility requirements
  - Criteria for selecting recipients and for determining aid amounts
- The terms and conditions of loans students receive under the Federal Direct Student Loan (Direct Loan) program.
- Certain information about offered financial aid, specifically:
  - General conditions and terms applicable to any employment provided to a student as part of the student's financial aid package
  - Terms of any loan that is part of a student's aid package, a sample loan repayment schedule for sample loans, and the necessity for repaying loans
  - Method and frequency of financial assistance disbursements to students
  - Method used by the school for Title IV-eligible students to obtain or purchase required books and supplies by the seventh day of a payment period, as well as how the student may opt out
- Rights and responsibilities of student aid recipients, including:
  - Criteria for continued eligibility under each program
  - Standards of satisfactory academic progress
  - Criteria by which the student who has failed to maintain satisfactory academic progress may re-establish eligibility for financial assistance
-  **The availability of professional judgment adjustments for special or unusual circumstances to students accepted for admission and who have completed a FAFSA**
- The exit counseling information the institution provides and collects from student borrowers under the Federal Perkins Loan, Federal Family Education Loan (FFEL), and Direct Loan programs

You may want to cross-reference the sections of your manual that *describe* the information listed above, if this section of your manual only details those policies and procedures associated with *disseminating* the information.

Response:

Resources:

668.41(d)(1)
668.42
668.42(a)(1),(2)
668.42(b)(1)
GEN-22-15
2024-25 FSA Handbook, Vol. 6, Ch. 2, June 2024
668.42(b)(2)
668.42(b)(3),(4)
668.42(a)(4)
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024
HEA 479A
668.42(c)
2025-26 FSA Handbook, Vol. 8, Ch. 2
668.164(m)

The MCCD financial aid offices are comprised of dedicated financial aid professionals committed to serving students by providing information to secure the necessary financial resources to meet educational goals. The types and amounts of financial aid MCCD offers or recommends are subject to availability of funds, enrollment status and financial need. MCCD students have a variety of financial aid programs available for assistance. Programs vary in eligibility criteria, aid amounts, and repayment options. Information related to current financial aid news, important deadlines, the application process, financial aid forms, the cost of attendance (COA) and the net price calculator (NPC), types of financial aid, federal work study (FWS), scholarships, types of state grants, and the California Dream Act is available through the Financial Aid website. In addition, this website has a comprehensive list of frequently asked questions to provide students with additional information and resources.

For students that are Title IV eligible to be able to purchase or obtain the required books and supplies by the seventh day of a payment period, MCCD students can utilize the textbook website for information on how to obtain a textbook.

Procedures

When you construct your procedures, include:

- Who is responsible for maintaining the accuracy and timeliness of the information
- How and in what format the information is disseminated
- How requests from prospective students for this information are fulfilled, including time lines
- If dissemination is by Internet or (for enrolled students only) intranet, how the exact website address is conveyed to students and what provision is made for fulfilling requests for the information on paper
- The individual or group of individuals designated full time to assist students in obtaining the information, and how students are informed of that service

Response:

The director of financial aid (DFA) is responsible for making sure the information on the financial aid website is updated on an annual basis.

Resources:

668.41(b)
668.41(c)(2)
668.44

5.1.3 Institutional Information

Policies

The institution must make certain information about itself readily available upon request to enrolled and prospective students. The information itself is likely maintained by offices other than financial aid (except possibly the cost of attendance data and the summary of the return of Title IV funds requirements); you may want to list those offices here.

For those institutional information disclosures for which the financial aid office is responsible, you may want to cross-reference the sections of your manual describing that information. This section of your manual should address the *dissemination* (rather than content) of institutional information. It should include statements as to who is responsible for making each required piece of information available.

The institution must make available to enrolled and prospective students information related to:

- Accreditation and licensing of the institution
- Academic programs, facilities, and instructional personnel
- Cost of attending the institution
- Services and facilities for students with disabilities
- Student body diversity
- Net price calculator
- Refund policies
- Return of Title IV funds requirements
- Prohibition of arbitration agreements

Resources:

668.41(d)(2)
668.43
668.43(a)(6)
GEN-22-15
668.43(b)
668.43(a)(5)
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024
HEA 485(a)(1)(E)
668.43(a)(1)
668.43(a)(7)
GEN-13-07
668.43(a)(2)
668.43(a)(4)
685.300(d)-(f)
685.300(e)
GEN-23-10
99.7(a)(1)
668.41(c)
20 U.S. Code Sec. 1015b [HEA § 133]
GEN-10-09
668.231(a)

- Prohibition of class action waivers

Schools also must make policy decisions regarding FERPA requirements and fulfill certain notification requirements.

In addition, the law also requires the institution to post certain pricing information regarding recommended and required textbooks for each of its courses on the institution's online course schedule or linked to the course schedule from another site, such as a college-designated bookstore.

Response:

MCCD makes available to enrolled and prospective students the following information related to:

- Accreditation and licensing of the institution
- Academic programs, facilities, and instructional personnel
- Cost of attending the institution and the Cost of Attendance
- Services and facilities for students with disabilities
- Student body diversity
- Net price calculator
- Refund policies
- Return of Title IV funds requirements and policy
- FERPA
- Satisfactory Academic Progress (SAP) Appeals
- Professional Judgment (PJ) Appeals

Procedures

State by whom, how, when, and to whom required institutional information is provided, or cross-reference the policies and procedures of the responsible offices.

Response:

The director of financial aid (DFA) is responsible for making sure the information on the financial aid website is updated on an annual basis.

Resources:

668.41(b)
668.41(c)(2)
668.44

5.1.4 Completion or Graduation Rate

Policies

An institution must annually prepare its completion or graduation rate, and if applicable, its transfer-out rate, and must make these rates available to enrolled or prospective students through appropriate publications, mailings, or electronic media. This section of your manual should address the *dissemination* (rather than content) of this information and include statements as to who is responsible for preparing the rates and who disseminates them.

Resources:

668.41(d)(4)
668.45

Response:

The institutional effectiveness department at MCCD is responsible for preparing information on graduation and retention rates. This information must be prepared and reported annually.

Procedures

Explain by whom, how, when, and to whom the rates are provided, and/or cross-reference the policies and procedures of the responsible office(s).

Resources:

668.41(b)
668.41(c)(2)
668.44

Response:

The graduation and retention rates are provided by MCCD and the Integrated Postsecondary Education Data System (IPEDS). The institutional effectiveness department performs the institutional calculations and places that information on the MCCD website. The IPEDS surveys require mandatory reports. The graduation rate is determined by the IPEDS definition of the cohort of students that entered in the Fall and completed by the June of the 6th year from enrollment. The retention rate is determined by the cohort of students in the Fall that returned to the institution in the

Fall of the next, subsequent year. The retention rate is determined by the cohort students in the Fall that are enrolled in the 2nd Fall.

5.1.5 Annual Security Report

Policies

An institution must distribute an annual security report—including crime statistics and campus policies and procedures regarding security matters—to enrolled students and current employees. 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 must also be submitted to the U.S. Department of Education (ED), as required.



The Stop Campus Hazing Act was enacted on December 23, 2024, which includes several new tracking and reporting requirements for incidents of hazing reported to campus security or local police on campus. These include:

- Inclusion of hazing statistics in the annual security report. Schools must start compiling data by July 1, 2025.
- Institutions must have hazing policies in place by June 23, 2025.
- Compilation of a Campus Hazing Transparency report, a compiled report of hazing which summarizes findings concerning any student organization found to be in violation of institutional hazing policies. The report must include:
  - The name of the student organization;
  - A general description of the violation that resulted in the finding; and
  - Dates related to the alleged incident, the initiation of the investigation, when the investigation ended with a finding, and when the institution provided notice to the organization of the finding.

The Campus Hazing Transparency report must be prominently displayed on the institution's public website and must be displayed by December 23, 2025. Thereafter, the report must be updated at least twice a year to include all incidents involving a student organization and hazing, if applicable.

Indicate who:

- Compiles, maintains, distributes, and submits the crime statistics to ED
- Constructs and reports the institution's policies regarding campus security

Response:

MCCD distributes an annual security report, which includes crime statistics and campus policies and procedures regarding security matters to enrolled students and current employees. MCCD also ensures 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 submitted to the U.S. Department of Education (ED), as required.

Resources:

668.41(b)
668.41(c)(2)
668.46(c)
668.41(e)
668 Subpart D, Appendix A
668.44
GEN-14-13
The Clery Act Appendix for FSA Handbook
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024
P.L. 118-173
668.46(b)

Procedures

Indicate:

- How the annual security report is disseminated to the various target groups
- The procedures that must be followed to request a copy of the full report

You may also want to cross-reference the policies and procedures and/or publications of other offices with responsibility for these disclosures and reports.

Response:

Pursuant to the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, the Annual Security Report (ASR) is now available for viewing on the Crime Stats website.
It contains the current security and safety-related policy statements, emergency preparedness and evacuation information, crime prevention and sexual assault prevention information, and information about drug and alcohol prevention programming. The ASR also contains statistics of Clery crimes for MCCD for 2021, 2022, and 2023. A copy of the ASR is available by downloading it from the website.

Resources:

668.41(b)
668.41(c)
668.41(e)

5.1.5.1 Timely Warnings and Emergency Notifications

Policies

An institution must make timely warnings to the campus community about certain crimes reported to campus security authorities or local police agencies and considered threats to students and employees. An institution also must follow emergency notification as well as emergency response and evacuation procedures if there is an immediate threat to the health or safety of students or employees occurring on campus. Identify for each type of notification, who is responsible for providing the notification, under what circumstances, and who should be notified.

Response:

The Clery Act mandates that MCCD issue a timely warning for all Clery Act crimes that occur on campus that are reported to campus security authorities or local police agencies; and considered by the institution to represent a serious or continuing threat to students and employees.

Procedures

Describe how each notification is provided. You may also want to cross-reference the policies and procedures of the office(s) with responsibility for each of these notifications.

Response:

The emergency preparedness office encourages students to go to the Emergency Preparedness website for all emergency updates. The website will help students stay up to date with the latest emergency alerts. for the Merced and Los Banos campuses. Visitors to the MCCD campuses are advised to call 911 for any emergencies.

These messages may include, but are not limited to evacuation warnings or orders, severe weather advisories, community policing incidents, searches for missing at-risk individuals and public health alerts.

The MCCD also has an app called Campus Shield that all students are encouraged to download.

Resources:

668.46(e)
668.46(g)
The Clery Act Appendix for FSA Handbook
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024
2024-25 FSA Handbook, Appendix E, August 2024

5.1.5.2 Campus Crime Log

Policies

If an institution maintains a campus police or security department it must maintain and make available a daily crime log. Identify who is responsible for making the campus crime log available and who may have access to the log's information.

Response:

The MCCD Police Department will respond to all 911 calls that occur on district grounds. Officers are trained to handle incidents that may require first aid, victim assistance, emergency notifications, and de-escalation of violent situations with the responsibility to apprehend.

The MCCD Campus Police Officers will investigate all crimes that occur on district grounds. Campus Police Officers will provide a factual written documentation supporting their findings.

Procedures

Describe procedures for making the log available. You may also want to cross-reference the policies and procedures of the office(s) responsible for the log.

Response:

The Campus Police Department's main office is located on the Merced Campus with office hours Monday through Friday, 8:00 a.m. to 4:30 p.m. and security available 24/7. During the summer, office hours are closed on Fridays.

Merced Campus Police Department: 209.386.6600

Los Banos Campus Police: 209.381.6425

Police personnel enforce federal, state, and local laws, including criminal laws and vehicle code violations, as well as investigate all criminal and traffic cases that occur on Merced Campus, Los Banos Campus, and the Business Resource Center. The Campus Police Department also provides policing for a variety of events held on the Merced campus for the community at large.

As a Peace Officer Standards and Training (P.O.S.T.) certified police department, MCCD Police

Resources:

668.46(f)
The Clery Act Appendix for FSA Handbook
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024
2024-25 FSA Handbook, Appendix E, August 2024

respond to a variety of calls for service which include calls for crimes in progress and medical calls for sick or injured persons in addition to vehicle collisions. Campus Police operates as a separate jurisdiction working in conjunction with the Merced Police Department.

5.1.6 Student-Athlete Completion or Graduation Rate

Policies

An institution that provides athletically-related aid must prepare an annual report concerning the completion or graduation rate and transfer-out rate, if applicable, along with related statistics of its athletic aid recipients. When an institution offers athletically-related aid to a prospective student-athlete, it must provide the report to the student and to the student's parents, high school coach, and guidance counselor.

Indicate who is responsible for preparing the report and for disseminating it.

You may want to cross-reference the policies of office(s) responsible for aspects of this requirement that are not a function of the financial aid office.

Response:

Not applicable to the Merced Community College District (MCCD)

Procedures

Describe how the office responsible for disseminating the report receives the names of prospective student-athletes being offered athletically-related aid and how the information is distributed. If this requirement is satisfied by membership in a qualifying national collegiate athletic association, state it. Also indicate how and when the financial aid office is informed of athletically-related aid offers made to prospective and current student athletes. You may want to cross-reference procedures or publications of other offices responsible for meeting these requirements.

Response:

Not applicable to the Merced Community College District (MCCD)

Resources:

668.41(f)
668.48
668.45(a)-(e)
668.44
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024
2024-25 FSA Handbook, Appendix E, August 2024

5.1.7 Athletic Program Participation and Financial Support Report

Policies

A co-educational institution that has an intercollegiate athletic program must make its annual athletic program participation and financial support report available to enrolled students, prospective students, and the general public. The institution also must submit the report to ED. Indicate here who is responsible for compiling this report, making it available, responding to requests for it, and submitting it to ED.

Response:

Not applicable to the Merced Community College District (MCCD)

Procedures

Describe how the institution makes this report easily accessible and how the institution promptly fulfills requests for it. Indicate how and when the report is submitted to ED. You may want to cross-reference the procedures or publications of the responsible office(s).

Response:

Not applicable to the Merced Community College District (MCCD)

Resources:

668.41(g)
668.47
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024

5.1.8 Annual Fire Safety Report

Policies

If an institution maintains any on-campus student housing facility, it must distribute an annual fire safety report to enrolled students and current employees. 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 must also be submitted to ED, as required.

Indicate who:

- Compiles, maintains, distributes, and submits the fire statistics to ED

Resources:

668.41(a), On-campus student housing facility
668.41(b)
668.41(c)(2)
668.41(e)
668.49(a)-(c)
The Clery Act Appendix for FSA Handbook

- Constructs and reports the institution's policies regarding fire safety

2024-25 FSA Handbook, Appendix E, August 2024

Response:

Not applicable to the Merced Community College District (MCCD) because there is no on-campus housing.

Procedures

Indicate:

- How the fire safety report is disseminated to the various target groups
- The procedures that must be followed to request a copy of the full report

You may also want to cross-reference the policies and procedures and/or publications of other offices with responsibility for these disclosures and reports.

Response:

Not applicable to the Merced Community College District (MCCD) because there is no on-campus housing.

5.1.8.1 Fire Log

Policies

If an institution maintains any on-campus student housing facility, it must maintain and make available a fire log. Identify who is responsible for making the fire log available and who may have access to the log's information.

Resources:

668.49(d)
The Clery Act Appendix for FSA Handbook

Response:

Not applicable to the Merced Community College District (MCCD) because there is no on-campus housing.

Procedures

Describe procedures for making the fire log available. You may also want to cross-reference the policies and procedures of the office(s) responsible for the fire log.

Response:

Not applicable to the Merced Community College District (MCCD) because there is no on-campus housing.

5.1.9 Other General Disclosures

Policies

The institution must make the following information readily available through appropriate publications, mailings, or electronic media to enrolled and/or prospective students:

Resources:

668.41(d)(3)
668.43(a)(17)
668.45(a)(1)
668.41(d)(5)
668.41(d)(6)
668.14(b)(10)
20 U.S.C. 1092(a)(1)(V)
668.43(a)(18)
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024

- The institution's retention rate of certificate- or degree-seeking, first-time, full-time, undergraduate students as reported annually to IPEDS
- The institution's placement rate of, and types of employment obtained by, graduates of the institution's degree or certificate programs reported annually to IPEDS
- The types of graduate and professional school education in which graduates of the institution's four-year degree programs enroll if the institution offers a four-year degree program
- The most recent data and other information available concerning employment and graduation statistics, as well as relevant state licensing requirements, related to job placement rate advertisements used to attract students (if any are used by the institution)
- Information describing the institution's policies regarding vaccinations

You may want to cross-reference the sections of your manual that *describe* the information listed above if this section of your manual only details those policies and procedures associated with *disseminating* the information.

Response:

The MCCD must make the following information readily available through appropriate publications, mailings, or electronic media to enrolled and/or prospective students:

- The institution's retention rates, graduation rates, and placement rates, as reported annually to IPEDS, can be found under required reports, completion rates, and graduation rates under Notice of Required Disclosures.
- Information describing the institution's policies regarding vaccinations can be found under Student Support. Per Executive Order 803, MCCD requires that all new students enrolled for course credit must submit documentation of vaccination or immunity for hepatitis B. Other recommended immunizations are hepatitis A, human papillomavirus, influenza, measles, mumps, and rubella, meningococcal B, pneumococcal, poliovirus, tetanus-diphtheria-pertussis, and varicella.

Procedures

When you construct your procedures, include:

- Who is responsible for maintaining the accuracy and timeliness of the information
- How and in what format the information is disseminated
- How requests from prospective students for this information are fulfilled, including time lines
- If dissemination is by Internet or (for enrolled students only) intranet, how the exact website address is conveyed to students and what provision is made for fulfilling requests for the information on paper
- The individual or group of individuals designated full time to assist students in obtaining the information, and how students are informed of that service

You may also want to cross-reference the policies and procedures and/or publications of other offices with responsibility for these disclosures.

Response:

The institutional effectiveness department curates MCCD's institutional data and tells the complex stories of the campus community. They help the college understand itself and make data-informed decisions by building interactive data tools and conducting in-depth analyses.

The MCCD student support department supports the well-being of the students by providing basic health care services.

Resources:

668.41(b)
668.41(c)(2)
668.44

5.1.10 Drug and Alcohol Abuse Prevention Information

Policies

An institution must provide annually, in writing, in a way that will reach each student who is taking one or more classes for academic credit (excluding continuing education students and regardless of the length of the program), and each employee certain information which is part of its drug and alcohol abuse prevention program, including institutional sanctions for violations of its standards of conduct regarding drugs and alcohol. An institution must also provide to every student upon enrollment a separate, clear, and conspicuous written notice with information on the penalties associated with federal and state convictions for the sale or possession of illegal drugs by students while enrolled and receiving Title IV aid.

Resources:

86.100(a)
668.40
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024
2024-25 FSA Handbook, Appendix E, August 2024

Response:

Under the Drug-Free Schools and Communities Act Amendment of 1989, MCCD is required to distribute its Substance Abuse Policy to faculty, staff, and students. On an annual basis, MCCD will distribute to all faculty, staff, and students a copy of this policy.

Procedures

When you construct your procedures, include:

- Who is responsible for maintaining the accuracy and timeliness of the information
- How and in what format the information is disseminated
- If dissemination is by Internet or intranet, how the exact website address is conveyed to students and what provision is made for fulfilling paper requests for the information

- The individual or group of individuals designated to assist students in obtaining the information, and how students are informed of related services

You may wish to cross-reference the policies and procedures of the office(s) responsible for providing the information and related services, as well as the manual section addressing Drug-Free Workplace requirements.

Response:

This notice is distributed to all faculty, staff, and students via email on an annual basis. If there are questions regarding the policy or if additional resources are requested, the following departments can be contacted:

For Opioid Overdose Prevention, students and staff should make themselves aware of this resource on the website. For substance abuse, information can be found on the Health Resource website.

5.1.11 Voter Registration Information

Policies

Under the National Voter Registration Act of 1993, institutions in most states and the District of Columbia must make a good faith effort to distribute voter registration forms to their students. If required under the Act, the institution must make the voter registration forms widely available to its students, and it must individually distribute the forms to its Title IV-eligible degree and certificate-seeking students. Detail those policies associated with disseminating voter registration materials here.

Resources:

668.14(d)
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024
2024-25 FSA Handbook, Appendix E, August 2024

Response:

The California Secretary of State is committed to making voter information and online registration available. The MCCD provides information on voter registration by hosting an event every Fall semester.

Procedures

Indicate by whom, how, when, and to whom required voter registration materials are provided. Cross reference the policies and procedures of any responsible offices.

Response:

The Association of Students at Merced College (ASMC) assists with voter registration on the campus.

5.1.12 Peer-to-Peer File Sharing

Policies

An institution must make information readily available to enrolled and prospective 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. Institutions should provide legal alternatives for downloading or otherwise acquiring copyrighted material. Institutions should provide enrolled students with a brief description of its policy with respect to unauthorized peer-to-peer file sharing in an annual notice to students containing the list of consumer information it must disclose and the procedures for obtaining this consumer information.

Resources:

668.14(b)(30)
668.43(a)(10)
GEN-10-08
2024-25 FSA Handbook, Vol. 2, Ch. 6, August 2024
2024-25 FSA Handbook, Appendix E, August 2024

Response:

The MCCD supports the Higher Education Opportunity Act and Digital Millennium Copyright Act, which outlines efforts to eliminate illegal copyrighted material distribution. Under the law, college administrators may be obligated to provide copyright holders with information about users of the district's information network who have violated the law. Accordingly, students are prohibited from using the information network to illegally download and/or share music, video, and all other copyrighted intellectual property. Illegal forms of downloading and file sharing as well as the unauthorized distribution of copyrighted materials are violations of the law and may subject offenders to academic sanctions from the College as well as criminal and civil penalties, including a lawsuit brought by the Recording Industry Association of America (RIAA). In addition to being illegal, file sharing drains the district's network bandwidth, which slows computer connections for students and employees who are using the network for legitimate academic purposes and creates an unnecessary financial burden to the College. The district has developed policies with consequences to ensure that

students properly use the information network and respect music and other forms of intellectual property as well as conduct responsible use of the Internet. These policies are available from the President's Office or from the Learning Resources Center.

Procedures

When you construct your procedures, include:

- Who is responsible for maintaining the accuracy and timeliness of the information
- How and in what format the information is disseminated
- If dissemination is by Internet or intranet, how the exact website address is conveyed to students and what provision is made for fulfilling paper requests for the information
- The individual or group of individuals designated to assist students in obtaining the information, and how students are informed of related services, e.g., legal alternatives for downloading or otherwise obtaining copyrighted material

Response:

The district has developed policies with consequences to ensure that students properly use the information network and respect music and other forms of intellectual property as well as conduct responsible use of the Internet. These policies are available from the President's Office or from the Learning Resources Center.

Resources:

668.41(b)
668.41(c)(2)
668.44

5.1.13 Arrangements with Financial Account Providers, Including Tier One (T1) and Tier Two (T2) Arrangements

Policies

An institution that has an arrangement with a financial account provider to process Title IV credit balances, or to offer, market, or provide accounts to which Title IV credit balances could be disbursed, must disclose certain information depending upon the type of arrangement.

- Within 60 days following the end of the award year, the the institution must conspicuously disclose the contract(s) that establish the T1 or T2 arrangement(s), except for any portions that, if disclosed, would compromise personal privacy, proprietary information technology, or the security of information technology or of physical facilities. .
- Prior to disbursement of any Title IV aid, the institution must disclose information to students regarding features and fees of the accounts covered by the arrangements and options available in selecting an account. ED will establish the format for providing this information.
- The institution must conspicuously display on its web page the monetary and non-monetary benefits exchanged by all parties under the contract during the past award year, the number of students with financial accounts at any time during the past award year, and the mean and median costs to students associated with the accounts covered by the contract. ED will establish the format for providing this information. For subsequent award years, the contract must be posted within 60 days following the end of the award year. An institution meeting specific criteria may qualify for an exemption for posting this information.

Resources:

668.164(d)(4)(i)(B)
668.164(e)(2)(vi)
668.164(f)(4)(iii)
Federal Register, 07/18/17, p.32736
Cash Management Elec. Ann. #8 7/3/17
668.164(e)(2)(vii)
668.164(f)(4)(iv)
Cash Management Electronic Announcement #7, 06/16/17
2024-25 FSA Handbook, Appendix E, August 2024
Federal Register, 10/30/15, pp. 67168 to 67172

Response:

See Section 2.1 Institutional Divisional Structure

Procedures

Describe your school's procedures and timelines for posting the T1 and/or T2 disclosures on its website, where in relation to the institution's home page the information is posted, the URL for the posting, and the individuals and offices responsible for the posting.

Response:

See Section 2.1 Institutional Divisional Structure

5.2 State-Required Consumer Information

Describe any state-required consumer information not addressed by the previous sections of your manual. Include information about who is responsible for reviewing and updating it, as well as the frequency and method of distribution.

Response:

Not applicable to the Merced Community College District (MCCD)

5.3 Accrediting Agency Consumer Information

If your accrediting agency requires your school to provide consumer information to your students not addressed by the previous sections of your manual, list it here. Include information about who is responsible for reviewing and updating it, as well as the frequency and method of distribution.

Response:

Not applicable to the Merced Community College District (MCCD)

5.4 Title IV Loan Counseling

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). All graduate PLUS borrowers must undergo entrance counseling before receiving the first disbursement of a graduate PLUS.

In addition, *all student borrowers* of a loan made under the Federal Perkins Loan, Direct Loan, or FFEL programs must undergo exit counseling shortly before the borrower ceases at least half-time enrollment at the institution.

Resources:

685.304(a)
685.304(b)
GEN-15-06
2025-26 FSA Handbook, Vol. 8, Ch. 2
674.42(b)
682.604(a)

5.4.1 Entrance Counseling

Policies

This section of your manual details those policies and procedures associated with providing the required entrance counseling. You may want to cross-reference the sections of your manual that describe the information that must be conveyed during the counseling. Identify who must undergo entrance counseling and which office is responsible for conducting entrance counseling.

Resources:

685.304(a)

Response:

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). In addition, all student borrowers of a loan must undergo exit counseling shortly before the borrower ceases at least half-time enrollment at MCCD.

First-time Federal Direct Loan borrowers are required to complete an entrance counseling session before loan funds can be disbursed. The counseling informs the student of important information regarding the loan in regard to interest rates and options for paying the loans back.

Procedures

When you construct your procedures, include information regarding:

- How the counseling is conducted, including entrance counseling for borrowers enrolled in correspondence or study abroad programs
- A description of how the institution ensures the borrower receives the counseling materials, and participates in and completes the counseling if the institution conducts entrance counseling through interactive electronic means
- How the institution makes an individual with expertise in the Title IV programs reasonably available shortly after entrance counseling to answer the borrower's questions

Resources:

685.304(a)(3)-(5)
2025-26 FSA Handbook, Vol. 8, Ch. 2

Response:

First-time borrowers must complete a master promissory note (MPN) and entrance loan counseling on the Federal Student Aid website. Once the student completes the counseling, a file from the Common Origination and Disbursement (COD) can be uploaded into the MCCD system showing they have been completed. Students are informed about the entrance counseling on their Financial Aid Offer and on the financial aid website.

5.4.2 Exit Counseling

Policies

This section of your manual details those policies and procedures associated with providing the

Resources:

required exit counseling. You may want to cross-reference the sections of your manual that describe the information that must be conveyed and collected during exit counseling. Identify who must undergo exit counseling and which office is responsible for conducting exit counseling.

Response:

The Department of Education (ED) requires all student borrowers of Federal Direct Loans to complete the loan exit counseling for Federal Direct Loans. Borrowers must complete a loan exit when they drop below half-time enrollment status, withdraw, or graduate.

Procedures

When you construct your procedures, include information regarding:

- How the counseling is conducted, including exit counseling for borrowers enrolled in correspondence or study abroad programs
- A description of how and when the institution provides exit counseling materials to borrowers who withdraw or fail to complete exit counseling as required
- How the institution obtains the information required to be collected during exit counseling

Response:

nformation regarding Federal Direct Loan Exit Counseling can be found on the Federal Student Aid website. Once a student drops below half-time enrollment status, is withdrawn, or is cleared for graduation, they must complete the exit counseling requirement. The students are sent an email communication which explains the requirement and provides instructions for completing the process. Once the student completes the counseling, a file from the Common Origination and Disbursement (COD) can be uploaded into the MCCD system showing it has been completed.

If after 30 days the student has still not completed exit counseling, the student is sent a second notice with the same information that was included in the initial notice.

674.42(b)
682.604(a)
2025-26 FSA Handbook, Vol. 8, Ch. 2
685.304(b)

5.5 Teacher Education Assistance for College and Higher Education (TEACH) Grant Counseling

Prior to receiving the first disbursement of a TEACH Grant, the student must undergo initial counseling. If a student receives more than one TEACH Grant, the institution must ensure that the student receives additional counseling prior to the first disbursement of each subsequent TEACH Grant. In addition, an institution must ensure that exit counseling is conducted with each TEACH Grant recipient before he or she ceases to attend the institution.

Resources:

686.32

Policies

Response:

Not applicable to the Merced Community College District (MCCD)

Procedures

Response:

Not applicable to the Merced Community College District (MCCD)

5.5.1 Initial Counseling

Policies

This section of your manual details those policies and procedures associated with providing the required initial counseling. You may want to cross-reference the sections of your manual that describe the information that must be conveyed during the counseling. Identify who must undergo initial counseling and which office is responsible for conducting initial counseling.

Resources:

686.32(a)(3)
686.32(d)

Response:

Not applicable to the Merced Community College District (MCCD)

Procedures

When you construct your procedures, include information regarding:

- How the counseling is conducted, including initial counseling for recipients enrolled in correspondence or study abroad programs

- A description of how the institution ensures the recipient receives the counseling materials, and participates in and completes the counseling if the institution conducts initial counseling through interactive electronic means
- How the institution obtains the information required to be collected during initial counseling

Response:

Not applicable to the Merced Community College District (MCCD)

5.5.2 Subsequent Counseling

Policies

This section of your manual details those policies and procedures associated with providing the required subsequent counseling. You may want to cross-reference the sections of your manual that describe the information that must be conveyed during the counseling. Identify who must undergo subsequent counseling and which office is responsible for conducting subsequent counseling.

Resources:

686.32(b)(3)
686.32(d)

Response:

Not applicable to the Merced Community College District (MCCD)

Procedures

When you construct your procedures, include information regarding:

- How the counseling is conducted, including subsequent counseling for recipients enrolled in correspondence or study abroad programs
- A description of how the institution ensures the recipient receives the counseling materials, and participates in and completes the counseling if the institution conducts initial counseling through interactive electronic means
- How the institution obtains the information required to be collected during subsequent counseling

Response:

Not applicable to the Merced Community College District (MCCD)

5.5.3 Exit Counseling

Policies

This section of your manual details those policies and procedures associated with providing the required exit counseling. You may want to cross-reference the sections of your manual that describe the information that must be conveyed during the counseling. Identify who must undergo exit counseling and which office is responsible for conducting exit counseling.

Resources:

686.32(c)
686.32(d)
2025-26 FSA Handbook, Vol. 8, Ch. 2

Response:

Not applicable to the Merced Community College District (MCCD)

Procedures

When you construct your procedures, include information regarding:

- How the counseling is conducted, including exit counseling for recipients enrolled in correspondence or study abroad programs
- A description of how and when the institution provides exit counseling materials to recipients who withdraw or fail to complete exit counseling as required
- How the institution obtains the information required to be collected during exit counseling

Response:

Not applicable to the Merced Community College District (MCCD)

5.X - Reserved for Institutional Use

This section is reserved for any institution-specific area of policies and procedures not covered in previous sections. It may be necessary to include several sub-sections of institution-specific content within this area. If there is no institutional content, simply leave the area blank, or mark the box

Complete as preferred.

Section 6: Applications and Forms

6.1 Application Process

Policies

State your application policies here:

- Discuss the application methods and/or forms your students use to apply for aid
  - Describe how students and contributors with an SSN apply for and use an FSA ID. Provide details on the use of the FSA ID.
  - Describe how contributors with an SSN apply for and use an FSA ID.
  - Describe communication with applicants under the age of 13 to ensure compliance with Children's Online Privacy Protection Act (COPPA) of 1998.
  - Describe how incarcerated applicants and contributors complete the Free Application for Federal Student Aid (FAFSA®), if the institution has an approved prison education program (PEP).
- Describe how students learn about your application processes

Explain why your school uses certain application forms or methods. For example, if your school uses only the FAFSA® as the basis of your financial aid process, then state that here. If your state requires a separate application for state aid, explain here. If your school requires an institutional aid application, then explain why and when you use that application.

If you require an institutional application for all aid applicants or different types of students, such as freshmen, transfer, graduate, summer session, nondegree, and study abroad students, indicate that here.

Response:

For federal and state financial aid, students and parents complete the Free Application for Federal Student Aid (FAFSA) or the California Dream Act Application (CADAA). For students attending the Merced College campus or the Los Banos campus, the federal school code is 001237. In order to complete the FAFSA electronically, the student and parent must create an FSA ID username and password for completing their portion of the FAFSA form and for signing the FAFSA.

To apply for an FSA ID, students and parents with a social security number (SSN) need to log into studentaid.gov, where they will create an account by providing their full name, date of birth, SSN, email address, and a chosen username and password. This acts as their FSA ID, which they then use to access and electronically sign federal student aid applications. Contributors without an SSN can create an FSA ID, but they will be asked a few knowledge-based questions to verify their identity.

There are several ways that students are informed about the MCCD application process:

- The financial aid office website: The financial aid office maintains a comprehensive website that provides detailed information on the financial aid application process. This includes a video guide, and links to the necessary forms. The website is regularly updated to reflect any changes in policies or procedures.

- One-on-one counseling: Students have access to one-on-one counseling with a financial aid counselor (FAC) who can answer specific questions and provide personalized guidance through the application process. The website lists the contact information for office, phone, and counseling hours.

- Financial aid lab: The financial aid lab is located in the Lesher Student Services building, 3rd floor, room 312. And staff is available to help guide students through the application process

- Email Notifications and Reminders: The financial aid office sends out email notifications and reminders about important deadlines, required documents, and any updates related to financial aid applications. These communications help keep students on track throughout the application period.

Resources:

20 U.S. Code Sec. 1090 [HEA§483]
2025-26 FSA Handbook, Vol. AVG, Ch. 2
Electronic Announcement, 12/6/24 (GENERAL-24-140)
Electronic Announcement, 11/21/24 (APP-24-14)
Electronic Announcement, 7/30/24 (GENERAL-24-94)
2025-26 FSA Handbook, Vol. AVG, Ch. 1
Electronic Announcement, 2/5/24 (APP-24-02)
Electronic Announcement, 7/18/14
2025-26 FAFSA Specifications Guide, Vol. 1

The State of California does not require students to complete a separate application for state aid, but for state financial aid, the FAFSA or CADAA must be submitted by the deadline and meet all eligibility, financial, and minimum grade point average (GPA) requirements of either program.

Procedures

Describe the steps taken as each (federal, state, and/or institutional) application is received:

- Provide details about which staff members are responsible for processing the aid applications
- Indicate how they are processed

Give a brief explanation of the FAFSA process at your school and note the role, if any, the school plays in the application process. For example, if the school submits the FAFSA electronically via the FAFSA Partner Portal (FPP) indicate that here. FAFSA Partner Portal is located at https://fafsa.partnerportal.ed.gov/#/home.

Address the following procedures:

- Identification and treatment of incomplete applications
  - Who is responsible for reviewing applications
- Steps taken when students submit paper FAFSA Submission Summaries or electronic FAFSA Submission Summaries including:
  - Checking whether the school is listed on the output document
  - Who adds the school to ensure it receives an Institutional Student Information Record (ISIR)
  - How and when this is done
- Processes for reviewing initial and subsequent ISIRs (You may wish to cross-reference the file review section of your manual.)
  - Who is responsible for reviewing ISIRs
  - How and when this is done

 If unusual circumstances are identified during the application process, give details about that process and what follow-up information may be requested. You may wish to cross-reference the file review and professional judgment (PJ) sections of the manual.

Response:

The FAFSA and CADAA applications are both student-initiated. The student is responsible for verifying that they have Merced College listed on their FAFSA or CADAA. MCCD receives the data via an Institutional Student Information Record (ISIR) that is received electronically via the FAFSA Partner Portal (FPP).

The FAFSA applications are received via EdConnect, and the CADAA applications are received via WebGrants. The ISIRs are uploaded into both the Ellucian Colleague and the Student Forms systems. The FACs are responsible for reviewing all initial and subsequent applications. On a daily basis, the ISIRs are loaded into the systems, and a report is run identifying ISIRs whose eligibility needs to be reviewed due to changes made to their applications.

Provisional Independent Status: Initial and renewal applicants who indicate an unusual circumstance on their FAFSA form will submit their application under a provisional independent status. The FAC will notify students of the school's process, requirements, and timeline to review adjustment requests after their FAFSA form is submitted. Student Forms will assign the following forms:

- Provisional Independent Certification (003)
- Homeless or at Risk of Homelessness Certification (325).

Resources:

668.16(f)
Electronic Announcement, 8/7/23 (GENERAL-23-63)
2025-26 FSA Handbook, Vol. AVG, Ch. 5
2025-26 FAFSA Specifications Guide, Vol. 6
2025-26 FSA Handbook, Vol. AVG, Ch. 1
2025-26 FAFSA Specifications Guide, Vol. 1

6.2 Forms

Policies

Describe all forms (other than application forms) used in the financial aid process at your school:

- If you require different forms for different types of students, such as dependent, independent, freshmen, transfer, graduate, summer session, nondegree, and study abroad students, indicate that here (e.g., different verification forms for dependent versus independent students)
- Explain why these separate forms are used
- Describe all forms you use to resolve incomplete applications, such as an incomplete application form, additional information form, etc.
- Include sample forms in the manual appendix and cross-reference the appendix here (You may also want to cross-reference the document tracking and collection section of the manual.)

It may be helpful to identify the various processes used by your office to ensure you consider all of the forms.

Response:

MCCD uses Student Forms to complete verification, clear C-Codes, and to resolve conflicting information. Student Forms is also used to complete the satisfactory academic (SAP) process. Documents that are outstanding are also identified in the Ellucian Colleague system. All other forms can be found on the financial aid website.

Procedures

Provide information about:

- The form format, e.g., paper or electronic
- How often and who is responsible for updating forms
- Where forms are stored
- Who is responsible for ensuring they are available
- How they are distributed and tracked
- Any follow-up processes


You may also want to cross-reference section 2 of the manual which covers the confidentiality of student records and information sharing and Family Educational Rights and Privacy Act (FERPA).

Response:

Students are directed to the Student Forms portal to submit documents to the financial aid office with the following instructions:

- Go to verifymyfafsa.com
- Login with your Merced College Portal Username and Password
- Enter/confirm your student information
- Click 'Register Account' button

Student Forms sends out reminders to students regarding any missing documents. These messages are sent via email or text, depending upon what method the student has chosen when they created their Student Forms account.

A student's file will be considered complete once all required documents are received and reviewed. A student's file must be complete prior to determining their financial aid award, and any disbursements are made.

6.3 Deadlines

Policies

Note the yearly deadline for submission of the FAFSA set by the U.S. Department of Education (ED). Include information about other deadlines, such as:

- The school's application deadlines for Title IV campus-based funds

Resources:

668.53(a)(1)
Federal Register, 9/18/24
668.60

668.164(i)-(k)
2025-26 FSA Handbook, Vol. AVG, Ch. 1
2025-26 FAFSA PDF

- The last date by which a school must receive a FAFSA Submission Summary or ISIR to make a Title IV disbursement
- The last date by which Title IV loans can be processed to ensure compliance with cash management regulations
-  Deadlines for submission of all applications and forms (e.g., institutional forms, verification worksheets, various comment code resolution documentation, etc.)
-  Verification deadlines
- Deadlines for institutional programs (e.g., employment, scholarships, loans, etc.)
- State program deadlines

Address any policies relating to late applicants and any procedures for accommodating exceptions to institutional policies. (You may want to cross-reference the PJ section of the manual.)

Response:

MCCD must adhere to all Federal and State deadlines.

FAFSA: The FAFSA for the 2025–2026 aid year must be submitted by June 30, 2026, at 11:59 PM Central Time (CT).

- The last date that MCCD must receive an ISIR to make a Title IV disbursement in the 2025-2026 award year is June 30, 2026.
- The deadline for all 2025-2026 paperwork is July 7, 2026.
- The deadline to submit any FAFSA corrections or updates by MCCD is 11:59 p.m. Central time (CT) on September 12, 2026.

The California state priority deadline for the FAFSA and CADAA: The FAFSA and CADAA for the 2025-2026 aid year must be submitted by April 2, 2025.

MCCD Scholarships: The application deadline for each scholarship is listed on the Scholarships website.

Procedures

Provide details on how students are informed of deadlines and how they are monitored. List the steps for accommodating exceptions to institutional policies. Cross-reference the PJ section of the manual as well.

Response:

A student selected for verification is provided with written correspondence directing the student to their portal to submit any additional information requested. Once the student logs in to Student Forms, the student will be able to see the task(s) assigned to them and will receive consent reminders via text every 14 days and email every 10 days. A description of the required documents is provided as well as the procedures for submitting the information to the financial aid office. If a student does not complete verification by the established deadline, they will not receive a financial aid offer. If the student later completes the verification request prior to the end of the payment period, all aid may be awarded and disbursed as outlined in the federal regulations. Federal regulations state that verification documents must be submitted within 120 days from the last day of enrollment or September 19, 2026, whichever is earlier. The last date that aid can pay out is 180 days after the last date of enrollment.

Identity Verification: If a student is selected for Tracking Groups V4 or V5, the verification must be submitted within 60 days of the financial aid office requesting it.

Financial aid verification deadlines and scholarship deadlines are listed on the MCCD website. MCCD understands that there are times when students may encounter delays in obtaining documents required for review within a reasonable period of time. MCCD will encourage a priority deadline but will receive and process documents up to the Department of Education (ED) timelines.

6.4 Document Assignment, Collection, and Tracking

Policies

Explain your school's document assignment, collection, and tracking system for all applications and forms. If certain documents are assigned, collected, or tracked in an automated or manual fashion, indicate that here.

- Identify any third-party servicer your school uses and describe their responsibilities in the processing of student financial aid applications
- Identify who may access ED's data systems to draw down and transmit applicant data
- Describe policies for protecting application data from access and disclosure by unauthorized personnel

Resources:

GEN-23-08
GEN-16-12
GEN-15-01
Electronic Announcement, 2/16/23 (GENERAL-23-10)
GEN-15-18
GEN-16-15
GEN-23-03

Response:

MCCD utilizes Ellucian Colleague and Student Forms for document assignment, collection, and tracking. Student Forms provides a safe, upload experience that protects the student's privacy and protects the student's personally identifiable information (PII).

Procedures

Give a step-by-step narrative of the document assignment, collection, and tracking procedures. Include information such as:

- How students and/or parents are notified of required documents
- How documents are tracked (i.e., in an automated or manual process)
- The frequency of document requests
- Steps taken once documents are received
- Steps taken to protect applicant documents and data from access and disclosure by unauthorized personnel
- Processes for returning incomplete documents
- Methods by which additional information is requested
  - Is this procedure manual or automated
- Person(s) responsible for overseeing these processes
  - Who is responsible for reviewing incoming documents

Resources:

GEN-16-12
GEN-15-18
Electronic Announcement, 9/16/21 (GENERAL-21-57)
Electronic Announcement, 2/16/23 (GENERAL-23-10)

You may want to cross-reference the forms section of the manual.


Cross-reference section 2 of the manual which covers the confidentiality of student records and information sharing and Family Educational Rights and Privacy Act (FERPA).

Response:

Students are initially notified if they have been chosen for verification or may be required to provide MCCD with additional information by a comment on the FAFSA Submission Summary (FSS). Each student's ISIR is loaded into both the Ellucian Colleague System and into Student Forms. MCCD currently relies on Student Form prompts when reviewing verification and C-Codes that may result in MCCD requesting additional documentation.

Student Forms automatically populates the requirements needed based on the ISIR verification groups and/or the ISIR comment codes. The same information is also loaded into the Ellucian Colleague System. The student receives notifications weekly from Student Forms, informing them of any needed documents that need to be submitted. Students are notified via the student's email address, and text messages if the student has chosen that method of communication.

6.5 Pre-Packaging Appeals

Policies

Describe your institution's policy for addressing student/parent appeals prior to the packaging

Resources:

process. Give examples of conditions that might trigger an appeal and situations that would warrant an appeal approval or denial [e.g., a change in student resources, the availability of student aid funds, or changes to the student aid index (SAI)]. If your institution exercises PJ discretion in addressing pre-packaging appeals (e.g., dependency overrides, offering Direct Unsubsidized Loan funds to students whose parents refuse to complete the FAFSA and provide no financial support), cross-reference the PJ section of the manual here.

Response:

See Section 10: Professional Judgment (PJ)

Procedures

Describe the pre-packaging appeal process. Information should include at a minimum:

- How students are informed of the right to appeal
- The step-by-step appeal process, including any deadlines or time frames by which appeals must be received
- Documentation required in support of an appeal
- Who is responsible for reviewing appeals and how that individual or committee goes about reviewing them
- Information about how and when students are notified of appeal outcomes

Response:

See Section 10: Professional Judgment (PJ)

GEN-11-15
GEN-17-08
2025-26 FSA Handbook, Vol. AVG, Ch. 5
GEN-21-02
GEN-22-15
GEN-11-04
GEN-08-12
GEN-08-01
GEN-03-07
HEA 479A

6.X - Reserved for Institutional Use

This section is reserved for any institution-specific area of policies and procedures not covered in previous sections. It may be necessary to include several sub-sections of institution-specific content within this area. If there is no institutional content, simply leave the area blank, or mark the box Complete as preferred.

Section 7: File Review and Verification

7 - File Review - Intro

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.

The process of performing a file review can branch off into several different actions as mentioned above. For this reason, you have several choices of how to illustrate your policies and procedures. For example, you could use a flowchart to visualize options and to recognize applicant follow-up questions that may be prompted during verification. Alternatively, you might create a verification checklist (paper or electronic) to guide staff members through the verification process.

Response:

Verification is the process of confirming the accuracy of student and parent information reported on the Free Application for Federal Student Aid (FAFSA). Only a portion of the student population is selected for verification. The school has the authority and may be required to verify additional students. Students may be selected for verification if there is a discrepancy or a condition, which is unusual and warrants investigation. Students are notified that they are selected for verification on the FAFSA Submission Summary (FSS).

If there are changes in federal regulations or institutional policies and procedures, this policy will be updated. Staff training will be provided with all staff to ensure compliance. Financial aid staff are encouraged to seek additional guidance provided in the Federal Student Aid (FSA) handbook, which serves as the superseding governing law. (FSA Handbook 2025-2026 Application and Verification Guide).

Merced Community College District (MCCD) verifies all students who have been selected by the Department of Education (ED) for any of the verification categories. However, students may be asked to provide additional information if further investigation is needed to resolve a discrepancy. MCCD uses the Student Forms platform provided by the Ellucian Company to collect required documents and to complete verification. Documents needed to complete verification are identified in both Student Forms and in the financial aid management system, which for MCCD is the Ellucian Colleague System. During the review of the student's file, in addition to verification, the financial aid advisor (FAA) 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 FAA must also review subsequent Institutional Student Information Records (ISIRs) for changes that may affect the applicant's financial aid eligibility. For these reasons, verification is considered under the broader process of file review.

Upon receipt of the Institutional Student Information Record (ISIR), a document tracking letter-to-do checklist item is automatically generated in the Ellucian Colleague system for any student who is selected for verification. These required to-do items inform the student of additional information, which is required to complete the financial aid verification process.

The students have 30 days to submit the required information. If students do not submit required documentation within 30 days, the student will be sent a subsequent notification every month thereafter. Although reminder notifications are sent to students monthly, failure of students to meet the initial 30-day deadline will indicate that they are no longer interested in pursuing financial aid and no further action will be taken to process their financial aid.

The financial aid office will verify all Pell Grant eligible students who submit all required documentation within the federal deadline that is published in the federal register each year. The financial aid office will complete verification for all other financial aid applications who fail to meet the deadline as workload permits. In addition, students who withdraw or cease attendance must meet

post-withdrawal late disbursement deadlines. Required documentation items are identified, and a receipt date is maintained in a file tracking system and in the Ellucian Colleague System. All required documents are identified upon receipt of the financial aid office. When all the requested items have been received, the financial aid coordinator (FAC) will pull the student's ISIR, mark all required documents as "received" and route it to the FAA for verification. As reviewed, corrections will be made for any change in data, and additional corrections may be queued by the FAA for transmission via the FAFSA Processing System (FPS) or the Ellucian Colleague System. When the corrected ISIR is received, a final review of the file takes place, and an award is made if the student is eligible.

Documentation submitted to the financial aid office must be legible, appropriate, and have the student's ID number for identification purposes. If the student submits a document that is not legible, the document will be returned, and appropriate documentation will be requested. Students selected for verification who fail to submit verification documents will not be awarded financial aid.

Because the financial aid office is liable for disbursements made prior to verification, it is the policy of the financial aid office not to award or disburse funds until verification is complete. MCCD's policy does not allow interim disbursements. Students must complete the verification process before aid is awarded or disbursed.

7.1 Verification

7.1.1 Selection of Applicants to be Verified

Policies

Briefly describe the customized approach to the federal selection of applications for verification by the FAFSA Processing System (FPS). Indicate that 100 percent of federally-selected applications must be verified. Reference any *Federal Registers*, Dear Colleague Letters, and any additional U.S. Department of Education (ED) guidance related to completing verification for federally-selected applicants.

State your policies regarding the selection of applicants or data elements to be verified, beyond those selected by the FPS, including the criteria for institutional selection, if any. Also, include a description of any analysis performed to determine which students or data elements to select for institutional verification. Specify the percentage of applicants the school will verify for institutional purposes. For example, if your school verifies freshman applicants at a different rate than continuing students, be sure to indicate that here.

Specify any timeframes associated with verification requirements, and state when verification must be completed during the financial aid packaging cycle—before offering Title IV aid, after preliminary offer but before disbursement, before or after loan origination, etc.

Identify all applicants excluded from verification. Absent conflicting information, the entire application (student data, and if applicable, contributor, i.e. spousal or parental 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, and Teacher Education Assistance for College and Higher Education (TEACH) Grants
- Transfer students who completed verification at the previous school and the current school obtains a letter from the previous school indicating verification was completed and the ISIR transaction of the verified application
- Applicants who are selected for verification after they are no longer enrolled and all Title IV disbursements have been made (including late disbursements)

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

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

Resources:

668.54
GEN-17-08
Federal Register, 9/4/24, pp. 71896 to 71898
Federal Register, 1/24/24, pp. 4553 to 4559
2025-26 FSA Handbook, Vol. AVG, Ch. 4
668.60(c)(1)
668.53
668.60(a)
668.60(b)(2)
668.54(b)
Program Integrity Q&A, Verification - Introductory Verification Questions
GEN-24-10
Electronic Announcement, 9/13/17

- Dependent applicant's contributors when both contributors are mentally incapacitated

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

Identify all eligible applicants for whom modification and waiving of some statutory and regulatory provisions applies under the Higher Education Relief Opportunities for Students (HEROES) Act. Eligible applicants include persons:

- Serving on active duty during a war or other military operation or national emergency;
- Performing qualifying National Guard duty during a war or other military operation or national emergency;
- Residing or employed in an area declared a disaster area by any federal, state, or local official in connection with a national emergency; or
- Who have suffered direct economic hardship as a direct result of war, other military operation, or national emergency.

Identify all applicants for whom the waiving of regulatory provisions applies when a federally declared disaster affects the offering of aid.

Response:

MCCD will verify all FAFSA applicants who have applied for financial aid and for whom the FAFSA Processing System (FPS) has been selected for verification. The FAA will verify all mandatory items identified by ED per the FSA Handbook. A student who elects not to receive any financial aid based on the FAFSA information and who is selected for verification will not be offered Title IV federal or state need-based financial aid.

Verification Exclusions:

There are times when the FAA does not need to verify a student's application. However, a student file must still be reviewed to resolve conflicting information. The FAA should document the basis for the verification of exclusion. Other information not excluded must still be verified according to all other requirements.

Verification of the FAFSA information is not required of a student in the following situations:

- Death of the student: The FAA does not have to continue verification if the student died before verification was completed. MCCD cannot make any additional disbursements, except for Federal Work Study (FWS) funds already earned, to any of the student's beneficiaries. MCCD cannot originate or disburse a Federal Direct Loan or consider any interim disbursement of Pell Grant or Federal Supplemental Educational Opportunity Grant (SEOG) funds to be an overpayment.
- Not an aid recipient: The student will not receive Title IV aid for reasons other than a failure to complete verification. This includes being ineligible for that aid and withdrawing without receiving it.
- Non-need-based aid recipient: The student is eligible to receive only unsubsidized student financial assistance, which includes non-need-based scholarships. This includes all students whose student aid index (SAI) is equal to or exceeds the student's cost of attendance (COA).
- Post enrollment: The student was selected for verification after ceasing to be enrolled at MCCD and all disbursements were made.
- Applicant verified by another school: MCCD's policy is to not accept the verification by another school and will complete verification.

Unless the FAA has reason to believe it is inaccurate, they do not have to verify the reported FAFSA information of the parents of a dependent student if any of the following apply (including in cases where there is only one parent):

- Both parents are mentally incapacitated.
- Both parents are deceased.

- The parents are residing in a country other than the United States and cannot be contacted by normal means. *
- The parents cannot be located because the student does not have and cannot get their contact information.

If it is determined that both parents fall into one of these categories listed above, the FAA will counsel the student on a dependency override special circumstance.

Unless the FAA has reason to believe it is inaccurate, they do not have to verify the reported FAFSA information of the spouse of an independent student if any of the following apply:

- The spouse is mentally incapacitated.
- The spouse is deceased.
- The spouse is residing in a country other than the United States and cannot be contacted by normal means. *
- The spouse cannot be located because the student does not have and cannot get their contact information.

* Given technological advances in communications, the concept of “normal means of communication” varies based on the country in which the individuals reside; however, it is rare that parents cannot be reached by normal means of communication. If one parent can be reached, parental information must be verified.

The review of subsequent ISIR transactions and postscreening:

When subsequent ISIRs are received, they must be reviewed to determine if changes that were made impact a student’s eligibility, even if the student was already awarded.

- Subsequent ISIRs with a process date prior to the student’s last date of attendance in the current award year must be reviewed and, if selected, verified to resolve any change affecting the SAI and eligibility.
- If a subsequent ISIR is received for a student whose file has already been verified, the ISIR does not need to be verified again but should be reviewed for possible errors and issues affecting eligibility that would have been effective while the student was enrolled at MCCD.
- If selected for verification with a process date after the student has ceased attendance, verification is not required unless the student returns for a later period of enrollment within the same aid year.

If, as the result of any of these scenarios, the SAI and awards change, any over award must be resolved. If the SAI is lower and the Pell Grant eligibility is greater, the student is eligible for the higher Pell Grant amount if the disbursement can be made within federal deadlines for verification and disbursement. Awards disbursed after the end of a term must be based on completed classes only.

Resources:

668.54(a),(b)

Procedures

Describe the process of identifying applicants or applications selected for verification. Include a statement regarding the process of identifying and verifying subsequent or additional applications or data elements. Explain how the institution will monitor the number of selected applicants to ensure verification policies are enforced. Include a description of the method and internal controls the institution will use to ensure consistent application of its verification procedures.

Response:

Students are identified as selected for verification in both Student Forms and in the Ellucian Colleague System based upon information received from the ISIR upload into both systems. The FAA systematically verifies only those data elements required by the federal and state regulations. However, the FAA may request additional information if further investigation is needed to resolve a discrepancy.

Students that are institutionally selected for verification will be processed under the V1 standard verification group:

- To institutionally select a student, the FAA must request verification in Student Forms and include

the reason for institutionally selecting the student. The FAA must also update the Ellucian Colleague System by updating the verification status flag and marking that student's record as "required to be performed" under the verification flag.

- If a student submits unsolicited documents to the financial aid office or into Student Forms, the FAA must review those documents for accuracy with the ISIR data.

If any of these or other exclusions are confirmed, the FAA will follow the guidelines for verification exclusions as outlined in the FSA Handbook and be responsible for waiving the task/document(s) in Student Forms and making appropriate comments in the Ellucian Colleague System.

A student's FAFSA may be selected for verification after a disbursement of aid has been made. MCCD will notify the student and verify the required information before making any subsequent disbursement of funds. If subsequent disbursements have not yet been disbursed, the funds will not be disbursed until verification is completed.

If verification changes the eligibility of the amount of financial aid disbursed, the student is responsible for repaying all aid for which they were not eligible, excluding Federal Direct Loan funds already disbursed and FWS that was already earned. If the student fails to submit verification documentation, they are not eligible for any subsequent disbursements and are responsible for repaying all aid for which they were not eligible.

If an applicant's verification has been completed and a subsequent ISIR is uploaded with a different tracking group change, no disbursements of any Title IV aid may be made until verification of the new group has been completed. If Title IV aid had been disbursed prior to the institution receiving an ISIR with the new verification group and the applicant does not satisfactorily complete verification, MCCD is not liable for those previously made disbursements. However, the applicant is liable for the full amount of Title IV aid that was disbursed.

Since there are various reasons that an ISIR would have an NSLDS postscreening, the FAA is required to resolve all postscreening C Codes before making any future disbursements.

7.1.2 Acceptable Documentation and Forms

Policies

Include a statement that ED publishes a notice in the *Federal Register* annually which details acceptable documentation for Free Application for Federal Student Aid (FAFSA®) information subject to verification for a given award year. Also, include a statement regarding any additional guidance ED publishes through Dear Colleague Letters (GEN) and Electronic Announcements. Provide a clear explanation of required documents and the applicant's responsibilities for submitting them. Provide the timeframe in which an applicant must provide documentation for verification of application information. Also, indicate the consequences of an applicant's failure to provide required documentation within the specified timeframe. You may want to cross-reference the application and forms as well as the document collection and tracking sections of the manual.

List all acceptable documentation and forms used. Include information about:

- Verification worksheets used (if any), and whether your school uses a standardized or customized verification worksheet
- Official Internal Revenue Service (IRS) tax transcripts, unaltered federal tax information (FTI) data transferred to FAFSA online using the FUTURE Act Direct Data Exchange (FA-DDX), and alternative documents (such as a copy of the filed income tax return and the applicable schedules, Tax Return Transcript, Record of Account Transcript, Return Transcript for Taxpayer (RTFTP), Tax Return DataBase View (TRDBV) transcripts for victims of identity theft, and 1040X tax returns for amended tax filers)
- Documentation required to separate income and tax information for joint tax filers who are no longer married
- Untaxed income documentation (e.g., all untaxed income reported on U.S. individual tax returns, excluding schedules; W-2 forms for contributions to retirement plans; etc.)
- Signature requirements, giving a brief explanation of who must sign submitted forms
- Timeframe or deadline by which documents must be received (if stated in application and forms and/or document collection and tracking sections, cross-reference that information here)

Resources:

668.56
668.53(a)
668.53(b)
GEN-01-06
668.57
Federal Register, 9/4/24, pp. 71893 to 71898
2025-26 FSA Handbook, Vol. AVG, Ch. 4
668.60(c)(1)
Electronic Announcement, 12/19/23 (GENERAL-23-118)
Electronic Announcement, 8/29/24 (GENERAL-24-108)
Program Integrity Q&A, Verification, DOC-Q12/DOC-A12
GEN-24-10
Electronic Announcement, 4/1/24 (GENERAL-24-29)
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024

If you use online or electronic forms with electronic signatures to meet verification (or any other file review) requirements, detail how your school meets all of the requirements for the use of electronic documents and signatures found in GEN-01-06, the *U.S. Department of Education Standards for Electronic Signatures in Electronic Student Loan Transactions*, and other ED guidance. Include your school's policy for obtaining voluntary consent for electronic transactions and communications.

You may wish to reference additional guidance regarding the verification process as found in the *Application and Verification Guide* of ED's *Federal Student Aid (FSA) Handbook*.

Indicate circumstances when the Professional Judgment Flag (PJ Flag) is set on the ISIR, including when:

- There are changes (corrections, updates, or PJ adjustments) to FTI that is retrieved from the IRS via the FA-DDX, and the FAA determines a need to override the FTI and trigger a recalculation of the student aid index (SAI);
- There are required corrections to FTI retrieved from the IRS via the FA-DDX when an amended tax return was filed with the IRS after the FAFSA was completed, and the FAA determines there is a need to override the FTI and trigger a recalculation of the SAI;
- There are individuals who file both an IRS tax return and a tax return with Puerto Rico or another U.S. territory and the FTI from the IRS must be corrected to reflect the territory tax return and override the FTI from the FA-DDX; or
- The FAA uses their PJ discretion to make PJ adjustments to non-FTI data (such as the Foreign Earned Income Exclusion, child support received, assets, etc., but not the cost of attendance).

Response:

ED publishes a notice in the Federal Register annually which details acceptable documentation for FAFSA information subject to verification for a given award year. Additional information may be provided by ED through Dear Colleague Letters (GEN) and Electronic Announcements (EA). Also, the NASFAA Today's News and AskRegs Knowledgebase are resources utilized by the financial aid offices to remain current on any verification changes.

If a student is selected for verification and refuses or fails to submit the required documentation by the date requested, the student will not receive any federal or state funds. If the student later completes the verification request prior to the end of the payment period, all aid may be disbursed as outlined in the federal regulations. Federal regulations state that verification documents must be submitted within 120 days from the last day of enrollment. The deadline to submit corrections or updates to the 2025-2026 FAFSA is September 12, 2026.

Important Deadlines and Consequences: Students must adhere to all posted deadlines on the website

Late Disbursements:

If a student submits verification documentation after the term is complete and they are no longer enrolled or have withdrawn, they may be eligible for a late disbursement if the student had a processed FSS or ISIR with an official SAI while enrolled. To process the late disbursement, the FAA would need to follow the procedures for a late disbursement as stated in the FSA Handbook. For students that withdraw and they are now an R2T4, the file will be reviewed by the appropriate FAA that is handling R2T4 students.

Acceptable documentation and forms used:

- Verification Worksheets (through Student Forms).
- Official Internal Revenue Service (IRS) tax transcripts, unaltered federal tax information (FTI) data transferred to the FAFSA using the Future Act Direct Data Exchange (FA-DDX), and alternative documents, such as:
  - A copy of the filed income tax return and the applicable schedules, signed by the student or
  - A copy of the filed income tax return and the applicable schedules, with the Tax Preparer's Tax Identification Number (PTIN).
  - Record of Account Transcript.
  - Return Transcript for Taxpayer (RTFTP).

- Tax Return Database View (TRDBV) transcripts for victims of identity theft. **
- 1040X tax returns for amended tax filers. ***
- Documentation required to separate income and tax information for joint tax filers who are no longer married

- A signed copy of the filed income tax return.
- W-2 forms to determine what percentage of the income was for each filer
- Untaxed income documentation:
  - All untaxed income reported on the filed income tax returns.
  - W-2 forms
  - Any other documentation requested for untaxed income.

** Victims of Identity Theft: Victims of Identity theft who are unable to provide a tax transcript or use the IRS FA-DDX must submit the following:

- A signed and dated Financial Aid Statement form in Student Forms indicating that they were a victim of IRS tax-related identity theft and that the IRS has been made aware of the tax-related identity theft and
- A signed copy of the 2023 tax return, applicable schedules, and an IRS 4674C letter confirming identity theft.

Tax filers may inform the IRS of the tax-related identity theft and obtain a TRDBV transcript by calling the IRS's Identity Protection Specialized Unit at 800.908.4490. The IRS will authenticate the tax filer's identity and provide the filer with a TRDBV transcript that will look different than a regular transcript, but that can be used for verification. Tax filers who cannot obtain a TRDBV transcript may instead submit another official IRS transcript or equivalent document provided by the IRS if it includes all income and tax information required to be verified. No signature or stamp is required unless the FAA doubts the authenticity of the TRDBV transcript.

*** Filers of Amended Returns: Per GEN 24-29, the FA-DDX will transfer only the most recent AGI and filing status and the original values for other tax return elements. If the student is selected for verification by FPS, the MCCD financial aid offices will complete verification according to the requirements for non-amended tax filers.

If the MCCD financial aid offices are made aware that the student or another contributor filed a 1040-X and amended the return, then the FAA would need to request the following documents to complete verification:

- A signed copy of the 1040X form that was filed and
- An IRS Tax Return Transcript (that will only include information from the original tax return) or any other IRS Tax Return Transcript, or
- A signed copy of the income tax return) and the applicable schedules that were filed with the IRS or other relevant tax authority of a U.S. territory, or a foreign government that lists 2022 tax account information of the tax filer.

For V4 and V5 Verification:

Students who cannot appear in person may submit the V4 or V5 notary endorsement. This must be returned to the financial office with the appropriate government issued picture identification used with the notary via the U.S. Postal Service (USPS)l. The form cannot be faxed or sent electronically.

Procedures

Give a step-by-step narrative of the document assignment, collection, and tracking procedures. Include information such as:

- How students and/or parents are notified of required documents
- How documents are entered into the financial aid system, including system interfaces with other offices (e.g., in an automated or manual manner)

Resources:

GEN-01-06
Program Integrity Q&A, Verification, DOC-Q12/DOC-A12
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024

- Information about the frequency of document requests
- Steps taken once documents are received
- Processes for returning incomplete documents
- Methods by which additional information is requested
- Person(s) responsible for overseeing these processes
- Methods and internal controls used to make sure documents are not lost or misfiled

If you use online or electronic forms with electronic signatures to meet verification (or any other file review) requirements, detail your school's procedures for ensuring electronic documents, signatures, and transactions meet all ED requirements. Also detail your school's procedures for obtaining voluntary consent from students and parents when using electronic transactions and communications.

You may want to cross-reference the application and forms, as well as the documentation collection and tracking sections here.

Response:

When an ISIR is loaded into Ellucian Colleague and Student Forms and the student is selected for verification, the student is sent a missing information letter from MCCD notifying the student of the following information:

- That they have been selected for verification and that additional documentation is required.
- The letter directs the student to the Student Forms portal.

The Dependent or Independent Verification Web Forms are hosted in Student Forms and are completed online. Students and parents can upload all required documentation through Student Forms.

If the documents are incomplete or are completed incorrectly, the FAA will reject the document in Student Forms. The FAA must provide a detailed description of the reason for the rejection, which is then communicated to the student or parent via email and/or text messaging and is also displayed in Student Forms. Additional comments are also made in the Ellucian Colleague System.

If additional documents are needed after preliminary documentation has been submitted and the student has submitted the documents by the deadline, the FAA will add the requested tasks or documents in Student Forms. Students and parents will be notified through Student Forms via email and/or text when additional documentation is required.

7.1.3 Data Elements to be Verified

Policies

Include an explanation that ED publishes a notice in the *Federal Register* annually which identifies the FAFSA information subject to verification for each award year. Describe the Verification Tracking Groups and which data elements must be verified for each tracking group. You should also list any application information selected by the institution for verification along with a description of any analysis performed to identify application information subject to institutional verification.

Describe any changes to verification that ED makes during the award year and the effective date of those changes.

Explain when corrections have to be submitted to the FPS. Include information about the corrections cycle at your school, including the average time to process corrections.


Confined and incarcerated students in an eligible Prison Education Program (PEP) are only required to be verified for identity or Statement of Educational Purpose under V4 or V5. Verification is waived for this population under V1.

Response:

Each year, ED publishes a notice in the Federal Register identifying the FAFSA information which

Resources:

668.56
668.59(a)
Federal Register, 9/4/24, pp. 71897 to 71898
2025-26 FSA Handbook, Vol. AVG, Ch. 4
GEN-24-10

must be verified for that year. The verification requirements will vary by the tracking group. The OFA policy is to follow federal guidelines and verify all required items as identified in the selected tracking group. Students who are selected for verification will be placed in one of the three following groups. The group determines which FAFSA information must be verified for the student.

V1 Standard Verification Group-Tax Filers: For students or contributors that indicated that they did file a tax return, MCCD must verify the following:

a. Adjusted gross income (AGI)

b. Income earned from work

c. U.S. income tax paid

d. Untaxed portions of IRA distributions

e. Untaxed portions of pensions

f. IRA Deductions and Payments

g. Tax exempt interest income

h. Education Credits

i. Foreign income exempt from federal taxation

j. Family size ***

Items (a) through (h), if transferred directly from the IRS and unchanged, do not need to be verified. When information is not transferred from the IRS, and for item (i), the following documentation is sufficient for verification:

- A transcript obtained at no cost from the IRS or other relevant tax authority of a U.S. territory (Guam, American Samoa, the U.S. Virgin Islands) or commonwealth (Puerto Rico and the Northern Mariana Islands), or a foreign government, that lists 2022 tax account information of the tax filer; or
- A signed copy of the income tax return and the applicable schedules that were filed with the IRS or other relevant tax authority of a U.S. territory, or a foreign government that lists 2022 tax account information of the tax filer.

Qualified rollovers from one retirement account to another are not taxable, and they should not be counted as untaxed income (Untaxed portions of IRA distributions (d) or Pensions (e) above). Since neither a tax transcript nor FTI transferred via the FA-DDX identifies rollovers, MCCD must get documentation from the tax filer. This could be a signed statement with the rollover amount or a notation by the filer on the tax transcript or tax return that includes the word “rollover” beside any applicable item, like the instruction the IRS gives for Form 1040. The annotation must be signed and dated by the filer.

V1 Standard Verification Group-Non-Tax Filers: For students or contributors that indicated that they did not file a tax return, MCCD must verify the following:

- Income earned from work
- Family size ***

If the student or a contributor is self-employed but states they are not required to file a tax return, If the sum of the non-filer’s net earnings from self-employment from all jobs is $433 or less, then the non-filer does not owe self-employment tax and does not need to file a tax return.

Non-filers with FTI:

Students or contributors that indicated that they did not file a tax return, but there is FTI data reported on the FAFSA, will be reviewed by the FAA. The FAA will reach out to students to collect tax documents and submit an ISIR correction on the student’s behalf.

Unmarried and Both Parents Are Living Together or Married Filing Separately:

Tax return information for both parents and/or spouses listed on the ISIR must be collected and reviewed. With a married student or the married parents of a dependent student, if one spouse files separately and the other does not file a return but has some income; add the income earned from work of the spouse who did not file a return to the AGI of the spouse who did.

Marital Status Change After the FAFSA was Submitted):

Individuals who filed a joint tax return, but whose marital status changed after the end of the prior calendar year and was not reflected on the FAFSA, must submit documentation requested by Student Forms, which could be a divorce decree, proof of legal separation, 2022 Tax Return documents, and W-2s.

If the parent or student has not legally separated, but is living separately and apart, the FAA will add a request for Parent/Student Proof of Separation or Divorce in Student Forms. The student and/or parent must upload supporting documentation, such as a rental/lease/mortgage agreement indicating separate addresses.

Separation of Income:

MCCD will utilize the proportional distribution method to calculate the taxes paid. The percentage is calculated by determining the percentage of the joint AGI attributable to the individual and then multiplying the percentage by the taxes paid reported on the joint return.

*** See Family Size information below

V4: Custom Verification Group: Students must verify the following:

- Identity using an unexpired government-issued acceptable form of identification

V5: Aggregate Verification Group:

This group is a combination of V1 and V4. Tax filers and non-tax filers must verify the items listed in the V1 Standard Verification Group. Students must also verify Identity and Statement of Educational Purpose.

If a student's financial aid awards must be revised due to ISIR corrections resulting from verification, those changes are entered into the Ellucian Colleague System, and a revised financial aid offer is generated. Funds are removed from the student's account and refunded to the appropriate federal or state fund. The student then repays the school for the owing balance it creates.

*** Family Size:

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

- A statement signed by the applicant and, if the applicant is a dependent student, by one of the applicant's parents, that lists the name and age of each family member for the 2025-26 award year and the relationship of that family member to the applicant.

For a dependent student, MCCD does not have to verify family size in the following situations:

- The family size is reported as two with a single, divorced, separated, or widowed parent; or
- The family size is reported as three with parents who are married or are unmarried and living together.

For an independent student, MCCD does not have to verify family size in the following situations:

- The family size is reported as one if the student is single, divorced, separated, or widowed, or
- The family size is reported as two if the student is married or remarried.

If the student and/or parent are required to submit a statement regarding family size for verification, the appropriate document will be populated in Student Forms for the student/parent to complete.

Family size needs to align with the answers to the relevant dependency status questions, such as the one about having dependents other than a spouse. If verification reveals that answers do not match, the FAFSA form needs to be corrected so that the information is in alignment.

Foreign Earned Income Exclusion:

Verification of the Foreign Earned Income Exclusion is limited to those who report an exclusion

amount on the FAFSA and who have been selected for verification. If an application is selected for verification with either the V1 or V5 verification tracking flag, and the contributor entered an amount in the Foreign Earned Income Exclusion field, MCCD will have to verify that amount. Since the Foreign Earned Income Exclusion is not FTI retrieved using the FA-DDX, it must be manually reported on the FAFSA; therefore, it must be verified even if all other FTI was transferred from the IRS and is unchanged.

Since the Foreign Earned Income Exclusion is not transferred from the IRS, the September 19, 2023, Federal Register states that the following documentation is sufficient for verification of this data element:

Items (a) through (h), if transferred directly from the IRS and unchanged, do not need to be verified. When information is not transferred from the IRS, and for item (i) (the Foreign Earned Income Exclusion), the following documentation is sufficient for verification:

- A transcript obtained from the IRS, or a foreign government, that lists 2022 tax account information of the tax filer; or
- A copy of the income tax return and the applicable schedules that were filed with the IRS or a foreign government that lists 2022 tax account information of the tax filer.

Please Note: IRS Form 2555 (Foreign Earned Income) is not listed as acceptable documentation. If a copy of the federal tax return is used to complete verification, the 1040 and Schedule 1 will be needed to complete verification of the Foreign Earned Income Exclusion even though the exclusion only appears on Schedule 1 and not the 1040 itself. This is true even if the items in (a) through (h) do not need to be verified because they were transferred and unchanged. This results in the school having to review the 1040 for potential conflicting information even though the other tax data was retrieved via the FA-DDX.

Also, according to ED, the Foreign Earned Income Exclusion is not FTI transferred into the FAFSA using the FA-DDX because the FAFSA Simplification Act does not list it as a data element that can be included in FTI. Therefore, this field is manually entered by the student or contributor.

Procedures

Include a step-by-step description of the verification process. For example, if the financial aid staff member is responsible for recording changes to verification data elements electronically in the student system, or manually on a paper verification checklist, indicate how this is done. You might want to cross-reference additional guidance regarding the verification process as found in the *Application and Verification Guide* of ED's *FSA Handbook*.



A good practice might be to create a file review checklist, which includes all required verification items and other institution-specific file review elements. This checklist could be duplicated and used by financial aid staff members who review student files. Such a checklist can be an online form.

Explain how changes to FAFSA Submission Summaries/ISIRs are sent or transmitted to the FPS for reprocessing, and how verification status codes are reported for Federal Pell Grant-eligible applicants and deadlines.

Explain the school's procedures for reporting the verification results for students who are selected to verify identity and Statement of Educational Purpose using the FAFSA Partner Portal (FPP). Indicate who is responsible for reporting the verification results values.



The functionality which allows schools to report the results of V4 and V5 verification manually or via batch files is not expected to be available until after the release of the 2026-27 FAFSA application.

Response:

Verification Process:

When documents are submitted, the FAA will complete the file review in Student Forms. The student's documents in the Ellucian Colleague System will be updated to an approved status. Any required corrections will be made directly on the FAFSA Partner Portal (FPP). Financial aid funds will

Resources:

Federal Register, 9/4/24, pp. 71893 to 71898
2025-26 FSA Handbook, Vol. AVG, Ch. 4
Federal Register, 9/18/24, p. 67462
Electronic Announcement, 6/18/14
Electronic Announcement, 2/24/25 (APP-25-07)
Electronic Announcement, 5/23/24 (GENERAL-24-63)

not be disbursed until verification is done.

V1 Standard Verification Group-Tax Filers:

The FAA verifies the following data elements for each student (and parent if the student is dependent) selected for verification who is a tax filer:

Using the Tax Return:

If applicants or contributors had their information transferred to the FAFSA using the IRS FA-DDX, then no further verification of the AGI is needed. If the FAA needs to verify the AGI, a paper or electronic copy of the return can be used if it contains a signature. Acceptable examples would include, but are not limited to:

- A signed paper return that the student either mailed or brought to the school.
- A signed paper return that the student faxed or scanned and emailed.
- An electronic copy that the student signed with a stylus or finger.
- An electronic copy that we consider signed because it has an image of the student's signature attached.

However, a signature on Form 8879, the IRS for e-file Signature Authorization, is not an acceptable substitute for a signature on the tax return.

For persons who have a tax professional prepare their return, instead of a copy of the return with the filer's signature, the name and PTIN of the preparer or has their SSN or EIN and has been signed, stamped, typed, or printed with their name and address is sufficient. Note that the IRS requires paid preparers to have a PTIN.

If a person did not retain a copy of their 2023 tax information and it cannot be located by the IRS or the relevant government agency, they must submit a signed statement indicating that they did not keep a copy of their tax information as well as documentation from the taxing authority indicating that the information cannot be located. For an IRS filer, either a copy of Form W-2 for each source of employment income received for 2023 or, if they are self-employed, a signed statement certifying the amount of AGI and taxes paid can be used. For someone who filed an income tax return with a government of a U.S. territory or commonwealth or a foreign central government, accept a copy of a wage and tax statement or a signed statement certifying the amount of AGI and taxes paid for 2023.

Using the Tax Transcript:

If applicants or contributors are unable to transfer data via the FA-DDX, an IRS tax return transcript for the student, spouse, and/or parents to document information from the tax return can be used. Before requesting a transcript, they should allow enough time to pass after filing the return; it takes the IRS two to four weeks to process returns filed electronically and six to eight weeks for mailed returns. Tax transcripts submitted to MCCD for verification do not need to be signed by the tax filer.

The tax return transcript may show a per computer amount for some tax data that is different from what the filer reported to the IRS. The per computer amount should be used because it corrects mathematical errors and is more accurate than what appears on the original return. Also, if a transcript indicates "recomputed <tax return item> per computer," that amount may be ignored for verification.

Filers of Non-IRS Tax Returns:

A transcript from a government of a foreign nation or a U.S. territory or commonwealth that has all the filer's income and tax data to be verified can be accepted. A copy of the tax return, which must be signed by the filer or one of the filers of a joint return, can be accepted. Use the income and tax data that most closely corresponds to what is on the IRS tax return and convert monetary amounts into U.S. dollars as appropriate. If there is a question about the accuracy of the information on the signed copy of the return, the filer must provide a copy of the tax account information issued by the tax authority.

Unavailable Tax Returns:

If the contributor did not save (or lost) a copy of their tax return and is unable to get a tax return transcript from the IRS, the following may be accepted, in lieu of these documents

- A signed statement indicating that they did not keep a copy of their tax information

- Documentation from the taxing authority indicating that the information cannot be located
- W-2s for each source of employment income, or a wage and income transcript from the IRS
- If self-employed, a signed statement certifying their AGI and taxes paid

Self-Employed:

If the contributor is self-employed, a copy of Schedule C must be collected.

Untaxed IRA, Untaxed Pensions, IRA Deductions/Payments, Education Credits, Tax Exempt Interest:

Using the signed Tax Return, IRS FA-DDX or Tax Return Transcripts, verify each person whose **financial data was reported on the FAFSA.**

Foreign Income Exempt from Federal Taxation:

Using the signed Tax Return or Tax Return Transcripts, the FAA must determine if it is appropriate to use professional judgment (PJ) to increase the AGI by the amount of the exempted foreign income to determine the student's eligibility for the automatic maximum Pell Grant. If the FAA decides to use PJ, the FAA may move the foreign earned income amount from the untaxed income to the AGI.

V1 Standard Verification Group-Non-Tax Filers:

The FAA verifies the following data elements for each student selected for verification who did not file taxes, but who earned income:

Income Earned from Work:

Independent students/spouses and parents of dependent students not required to file must submit:

- A signed statement certifying that the individual has not filed and is not required to file a 2023 tax return and listing the sources and amounts of the 2023 income earned from work.
- Dependent/Independent Verification Web form in Student Forms satisfy this requirement
- For individuals without an SSN, ITIN or EIN, include that they do not have an SSN, ITIN, or EIN
- All copies of W-2's or IRS Wage & Income Transcript (equivalent document).
- Verification of non-filing (VONF) for individuals who would file a return with a relevant tax authority other than the IRS dated on or after October 1, 2024.

Tax Extension Filers:

If a student and/or parent who files a tax extension is selected for verification, federal regulations state that the school must complete verification in a timely manner. To complete verification, when taxes are not yet filed due to an IRS approved tax extension, students and/or parents will be asked to submit the following information:

- Verification web form in Student Forms
- A copy of the IRS approval of an extension beyond the automatic six-month extension for tax year 2023 (if the additional extension deadline has passed, will need to submit 2023 Tax Return)
- Copies of 2023 Form W-2's for each source of employment income or an equivalent document or
- If self-employed, submit a typed and signed statement on the Financial Aid Statement Form in Student Forms certifying the 2023 AGI and taxes paid.

MCCD cannot delay verification while waiting for the student and/or parent to supply the filed tax return information. Once the FAA completes verification and reconciles any conflicting information, the student is eligible for Title IV funds without any further delay. After all the appropriate documentation has been collected and verified, the students' file will be considered complete.

Exceptions:

The FAA may request a Tax Return or additional tax information to resolve conflicting information on a case-by-case basis.

The FAA verifies the following data elements for each student selected for verification using the listed documentation:

- Family Size: If discrepancies exist between the verification web form in Student Forms, the FAFSA,

and/or tax documents, the FAA must resolve the discrepancy. If the student and/or parent are required to submit a statement regarding family size for verification, the appropriate document will be populated in Student Forms for the student/parent to complete.

- Sibling, Parent or Spouse Also Enrolled at MCCD: If, on the verification web form in Student Forms, the student indicates a sibling, parent or spouse is also enrolled at MCCD as part of the household, the FAA must resolve any conflicting information if it exists. The FAA should review both verifications (if a family member is also selected for verification) and make every attempt to complete the files at the same time. If one is selected and the other is not, the FAA must review the ISIR record for the non-selected sibling/parent/spouse and resolve any existing conflicting information. The FAA may need to institutionally select the other household member for verification if conflicting information exists and cannot be resolved with current documentation. If the other household member fails to submit their verification items in a timely manner, the FAA may verify the file in hand and make detailed comments in the Ellucian Colleague System on both student records for tracking purposes. It is the responsibility of the FAA to track and review/re-verify the student's records once all documentation has been submitted by both parties.

Tracking Group V4 (Custom):

Students must verify their identity and statement of educational purpose. Students are identified from files received from FPS.

Tracking Group V5 (Aggregate):

Students must verify their identity and statement of educational purpose in addition to the items in the standard V1 verification tracking group. Students are identified from files received from FPS.

The Identity/Statement of Educational Purpose must be either:

- Presented in-person to the designated person in the student accounts or financial aid office or
- Notarized and the hard copies with wet signatures must be mailed to the financial aid office (cannot be uploaded to Student Forms by the student or sent electronically).
- Students may present a valid, government-issued photo ID via a video call to an authorized institutional individual if they cannot appear in person.

Applicants may be moved from previously assigned groups V1 and V4 to verification group V5 based on corrections made to the applicant's FPS record or on other information available to the Department. See information regarding GEN 24-84 in Section 7.1.1 Selection of Applicants Verified.

Reporting results for groups V4 and V5:

The verification results of identity for any student must be reported via the FPS. Select ‘Identity Verification Results’ option from the main menu, enter school identifiers, year, and the student identifiers. This process should be done at the beginning of each month for the previous month.

One of the following numeric codes (that most applies) will then be entered:

1. Verification completed in person; no issues were found.
2. Verification completed using notary; no issues were found.
3. Verification attempted; issues found with identity. Reserved by the Department for future use. No response from applicant or unable to locate.
4. Reserved by the Department for future use.

Results should be reported within 60 days following the initial request for verification of documentation. If there is a change in a result that has already been submitted, a new code may be submitted using the above process, which should occur within 30 days.

7.1.4 Conflicting and Inaccurate Information



Best Practices for Avoiding Implicit Bias in the Verification Process

In compliance with CFR 668, Subpart E, the institution will verify all federal student aid applicants whose applications have been selected for verification by the ED. An applicant is defined as a recipient of or an applicant for Federal Title IV aid who enrolled at the institution during the award year. If a student's application is selected for verification, the student must complete the verification process or forfeit federal student aid, and the student will be responsible for any charges incurred.

The school may also select applications for verification if there is conflicting information. Verification is done by collecting the documents the student used to complete the FAFSA and comparing them with the information the student provided on the FAFSA. A student may not receive financial aid until the verification process is complete. Verification of required documents is generally completed within two weeks after submission of all documents. During peak periods (e.g., April through September) more time should be allowed.

- Establish a set of requirements to review.
- Aim not to be too restrictive.
- Routinely run the data to determine the need to continue verifying unselected students.
- Publish the data findings for transparency's sake.

Additionally, a school should note and/or remove from policies items that are verified unnecessarily:

- Other untaxed income (e.g., from W-2s).
- Payments to tax-deferred retirement plans.
- Child support received or paid, etc.
- Military and clergy housing allowances.
- Exceptionally low or zero income.
- Dependency status questions (Being under 24 and an independent student is not a red flag).
- Level of support provided to individuals (for inclusion in family size).
- Number in college.

Policies

Explain what constitutes conflicting information and indicate who may make a determination that conflicting information exists. Indicate here whether only the conflicting data elements are documented or whether any conflicting information triggers a full verification of the student's file. Detail any documentation requirements you have set for commonly occurring conflicting information situations. You may cross-reference another section of the manual if resolution of conflicting information is treated separately from verification. In addition, verification of applicants who are not federally selected may be defined here.

Explain the school's procedures for identifying and resolving any potential conflict in data transferred by the student or parent from the IRS resulting in IRS response codes 203, 206, or 212.

Indicate the policies for referring instances of suspected fraud to ED's Office of Inspector General (OIG). You may wish to cross-reference the fraud section of the manual.

Response:

Resources:

668.16(f)
668.54(a)(2)
2025-26 FSA Handbook, Vol. AVG, Ch. 5
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024
2025-26 FAFSA Specifications Guide, Vol. 5
668.16(g)(1)
GEN-11-17
Electronic Announcement, 8/21/20

Conflicting Information

The financial aid office will review additional information to ensure that no conflicting information exists within the student's financial aid or with other information held by other offices at MCCD. The following list will be reviewed but is not an exhaustive list. Financial aid staff will review any information that comes to their attention that appears to conflict with information on the student's financial aid application.

- PJ approved by another institution
- Dependency Override granted by another institution
- Tax Return shows parent single head of household and the FAFSA/ISIR shows the same person as married
- Parent or student report on their FAFSA and sign a verification worksheet that they will not file a

tax return. If staff members have reason to believe that they would have been required to file a U.S. Income Tax Return, as the amount of reported income is greater than or equal to the minimum amount required to file as indicated in the instructions provided on the 1040.

- Questionable inclusion of a member in the household when there is doubt that the parent of a dependent student or the independent student is providing most of the support for the household member.
- Veterans Affairs benefits verified by the certifying official do not match the FAFSA.
- Duplicate SSN Flag
- Admissions information indicates student is in an ineligible program
- Declared major has a program status code of not active
- Financial aid major or program is not an eligible program
- High School information is consistent between FAFSA and Admissions

In addition, the financial aid office will implement an audit of verification records that insures 10% of selected applications are reviewed a second time to identify any areas needing improvement. Each problem identified will be addressed in updated policies and procedures, and training.

The FPS adds comment codes and text to the student's transaction to provide information to the student and to the school about the student's processed FAFSA. The comment codes and text are provided on the student's FSSs and on the ISIRs that are uploaded into the Ellucian Colleague System and Student Forms. Each comment code is three digits in length and can be found in the ISIR file.

In the context of the FAFSA, a C Code is a specific numerical code that indicates a discrepancy or issue with information provided on the application, while a C Flag is a marker that is set when a certain comment code is present, signifying that the issue needs to be resolved before aid can be disbursed. The C Code explains the problem, and the C Flag alerts that action is required to fix it. All C Codes must be cleared before a student is awarded. If a C Code is not resolved, the student will not be awarded Title IV funds.

2025-2026 FAFSA Specification Guide, Volume 7 - Comment Codes

Federal and state aid cannot be disbursed to a student whose conflicting application information has not been resolved. If conflicting information is discovered after aid is awarded or disbursed, the FAA must resolve the conflicting information, and the student will be required to pay aid received more than his/her eligibility unless the student is no longer enrolled for the award year. All conflicts must be resolved regardless of whether the student was selected for verification or not.

Procedures

Resources:

668.53(a)(5)

Detail how the applicant reconciles conflicting or inaccurate information with the financial aid office, and how the application is tracked during this process. Describe how applicants are notified when documentation is necessary to resolve conflicting information, and indicate how this documentation is processed by the financial aid office. Include the steps that must be followed for referrals to OIG. You may cross-reference another section of the manual if resolution of conflicting information is treated separately from verification. You may also wish to cross-reference the document collection and tracking, as well as the forms sections of the manual.

Response:

MCCD is required to resolve conflicting information regardless of the source or whether the student is selected for verification. Common examples of conflicting information include questions on the status of a student's high school diploma, academic progress, enrollment, and tax filing status. It can also arise from other offices such as admissions, the registrar, or academics providing information that conflicts with the FAFSA. If the FAA has conflicting information concerning a student's eligibility or if they have any reason to believe the student's application information is incorrect, they must resolve the discrepancies before disbursing Title IV funds. If the FAA discovers conflicting information during the process of a PJ, it must be resolved prior to processing the PJ. Financial aid may only be disbursed once all conflicting information is resolved. The FAA must document their findings and include an explanation that justifies their decision.

When a subsequent ISIR is received that either has a C Code or some other changes, such as

changes to marital status, conflicting tax filing status, conflicting asset information, or other changes to financial data that impacts a student's Title IV eligibility, then the student will be asked to submit the documents needed to resolve the conflicting information. The FAA will add the required documents to Student Forms.

If a discrepancy is noted after disbursing Title IV funds, the FAA must reconcile the conflicting information and take appropriate action under the specific program requirements. Depending on the outcome, funds may have to be returned.

The only exception is when the student dies during the award year or is no longer enrolled and will not be re-enrolled. If the student later enrolls, the FAA must resolve conflicting information at that time.

If the conflicting or inaccurate information indicates that there may be fraud on the part of the student/parent, the financial aid office is required to refer applicants who may have engaged in fraud or other criminal misconduct in connection with aid applications to the Office of the Inspector General (OIG) of ED, or if more appropriate, to a state or local law enforcement agency having jurisdiction to investigate the matter. Referrals to local or state agencies must be reported on an annual basis to the Inspector General. Any referrals to the OIG will be made by the director of financial aid.

The Department's OIG updated how it receives and processes suspected fraud ring complaints. Institutions now submit fraud ring complaints through the Department's OIG encrypted complaint web portal. Because the portal is encrypted, institutions no longer need to encrypt submitted documents.

7.1.5 Student Notification of Verification Changes

Policies

Describe the school's policies about notifying the applicant of the results of verification, if because of verification, the applicant's SAI changes and results in a change in their Title IV grant, campus-based, or loan amounts. Also, indicate the procedures the institution requires an applicant to follow to correct application information that is in error.

Response:

Once MCCD receives the confirmed verified ISIR transaction back from FPS, the student is notified on their FSS and receives a revised financial aid offer.

Procedures

Indicate the method by which the institution notifies an applicant of the results of verification and/or changes in the applicant's Title IV grant, campus-based, or loan amounts. You may wish to cross-reference the financial aid offer/package notification section of the manual.

Response:

Notification Upon Completion of Verification:

An email/text communication will be sent from Student Forms when the file review process is completed, and the Student Forms status is updated to verified. Once verification is completed and a verified ISIR is on file, the student will be sent a financial aid offer.

In the event that a student's financial aid awards must be revised due to ISIR corrections resulting from verification, conflicting information, a C Code resolution, an approved appeal or a correction that a student makes on their FAFSA that may change a student's SAI and award after the student was initially awarded and disbursed, an email notification will be generated to notify the student of those award changes. Any excess funds are removed from the student account and refunded to the appropriate federal or state account. If it creates an owing balance, the student then repays MCCD for the amount they owe for any funds that need to be returned.

Resources:

668.53(a)(3)
668.53(a)(4)
2025-26 FSA Handbook, Vol. AVG, Ch. 4

7.1.6 Interim Disbursements

Policies

Describe the school's policies regarding interim disbursements, including those made after it completes verification but before receiving processed ISIR corrections. If it makes such disbursements, describe which students are eligible to receive an interim disbursement. If you consider students for interim disbursements on a case-by-case basis, indicate what situations would qualify a student for a disbursement, such as a delay in receiving a revised FAFSA Submission Summary or ISIR. Indicate which staff has the authority to approve an interim disbursement. Also

Resources:

668.58
668.61
2025-26 FSA Handbook, Vol. AVG, Ch. 4

indicate from which programs (e.g., Federal Pell Grant, Federal Supplemental Educational Opportunity Grant (FSEOG), or Federal Work-Study (FWS) the school will make interim disbursements or if you will originate, but not disburse, a Federal Direct Student Loan (Direct Loan). You should also include the school's policies for the recovery of overpayments caused by interim disbursements. You might wish to cross-reference the disbursements section of the manual.

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Procedures

Indicate the methods the school uses to identify students who are eligible to receive an interim disbursement, including any situations or triggers which warrant automatic review of a student's file. Detail the process the school uses to determine whether or not it will make an interim disbursement. Also indicate how the school notifies students of interim disbursements and the conditions for receiving the funds. You should also include your procedures for recovering overpayments from interim disbursements.

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

7.2 Clearance of Database Matches, Reject Codes, C-Codes, Comment Codes, and Other Edits

Briefly describe the various database matches and explain why and when database matches occur. Explain the conditions that trigger reject codes and C-codes. Also describe any other comment codes, edits, or flags, such as Unusual Enrollment History (UEH), which affect a student's eligibility for Title IV aid, and which need resolution by the student and/or the school.

You should review ED's annual publications of *FAFSA Specifications Guide,* Volumes 6 and 7 to ensure your policies and procedures account for all database matches, reject codes, C-codes, comment codes, edits, and other flags which may impact a student's or contributor's Title IV eligibility. You may wish to reference these publications for additional guidance.

Resources:

2024-25 FSA Handbook, Vol. 1, February 2024
2025-26 FAFSA Specifications Guide, Vol. 6
NSLDS Transfer Student Monitoring & Financial Aid History User Guide and Record Layouts
2025-26 FAFSA Specifications Guide, Vol. 7

Resources:

2024-25 FSA Handbook, Vol. 1, Ch. 2, February 2024
NSLDS Transfer Student Monitoring & Financial Aid History User Guide and Record Layouts
2025-26 FAFSA Specifications Guide, Vol. 6
SAVE Guide to Immigration Documents
2025-26 FAFSA Specifications Guide, Vol. 7
2024-25 FSA Handbook, Vol. 1, Ch. 4, February 2024

Policies

Indicate your school's policy regarding the resolution of database matches, reject codes, C-codes, comment codes, edits, and flags (e.g., before packaging, before disbursing aid, etc.). Include information about documents and/or forms used, and identify who is responsible for the resolution.

Explain the consequences of failure to clear database matches, reject codes, C-codes, comment codes, edits, and flags that affect the student's eligibility. You may want to cross-reference the postscreening, document collection and tracking, and forms sections of the manual.

Explain your school's policy regarding the use of third-party verification using the U.S. Citizenship & Immigration Services' (USCIS) Systematic Alien Verification for Entitlements (SAVE) system to confirm a non-U.S. citizen's eligibility for Title IV aid.

You might consider using an *If/Then Decision Table* to chart your policies. Moreover, writing your policies and procedures with conditions can provide a clear illustration of the various steps taken to

review and resolve database matches, reject codes, and C-codes.

For example, an If/Then decision table could show:

- If a C-code appears on the student's FAFSA Submission Summary or ISIR with a comment indicating the student's name doesn't match the Social Security Administration's (SSA) records, then the student must provide the school with documentation, such as a marriage certificate or court order to explain the discrepancy in name
- If the student provides documentation to verify their name, then the application must be resubmitted to the FPS for the SSA database match
- If the student resubmits their application with the verified name and the application is rejected, then there is an error with the student's name in the Social Security database and the student must contact the SSA to have its database updated to prevent future problems

Note: You may wish to create a subsection that details the policies specific to each database match, reject or C-code, comment code, edit, or flag (e.g., 7.2.1 Social Security Administration, 7.2.2 Department of Homeland Security, 7.2.8 Unusual Enrollment History, etc.). For example, in the case of an Unusual Enrollment History (UEH) flag of "3" (comment code 277), you would indicate what documentation is necessary to resolve the flag, as well as who is responsible for reviewing that documentation and determining if is sufficient to satisfy the UEH flag, or if additional documentation is necessary, and whether the student's Title IV eligibility can continue or must be terminated. If you create a separate subsection for each database match, reject or C-code, comment code, edit, or flag, be sure to include the specific procedures that address each one.

You could also create sub-subsections under each subsection to distinguish between eligibility issues. For example, under subsection 7.2.4, National Student Loan Data System (NSLDS), you could create subsections to outline your policies and procedures related to Title IV loan defaults (7.2.4.1) and Title IV loan and grant overpayments (7.2.4.2).

You may wish to cross-reference the postscreening, document collection and tracking, and forms sections of the manual as necessary for each subsection.

Response:

The FPS C Flag is set on a student's record based on their eligibility conditions. Comments that generate the FPS C Flag are arranged by the areas that the comments are associated with. In the context of the FAFSA, a comment code (often referred to as a C Code) is a specific numerical code that indicates a discrepancy or issue with information provided on the application, while a comment flag (often referred to as a C Flag) is a marker that is set when a certain comment code is present, signifying that the issue needs to be resolved before aid can be disbursed; essentially, the comment code explains the problem, and the comment flag alerts that action is required to fix it.

- DHS Primary Match: 155, 288, 289, and 326
- DHS Secondary Match: 293 and 294
- Social Security Administration Citizenship Status: 018 to 020
- Veterans Affairs Match Flag: 158 to 160
- National Student Loan Data System (NSLDS): 162 to 165, 216, 217, 221 to 253, 255, 256, 258, 260, 261, 264, 265, 276, and 277
- NSLDS Match: 162 to 165
- Contact/Loan Type: 216 and 217
- Potential Pell Overpayment: 221 to 226
- Potential FSEOG Overpayment: 227 to 232
- Potential Perkins Overpayment: 233 to 238
- Potential TEACH Grant Overpayment: 239 to 244
- Potential Iraq and Afghanistan Service Grant Overpayment: 245 to 250
- Discharged Loan: 251
- Bankruptcy: 252

- Subsidized Loan Limit: 253, 255, 256, and 258
- NSLDS postscreening: 260 and 261
- Pell Lifetime Limit: 264 and 265
- Unusual Enrollment History: 276 and 277
- Foreign Income Exempt: 040, 076, 096, and 127
- Foreign Income: 303
- Unaccompanied Youth: 325

All C Codes must be cleared before a student is awarded. If a C Code is not resolved, the student will not be awarded Title IV funds.

Procedures

Include a description of the process or methods used to contact students about database matches, reject codes, C-codes, comment codes, or other student eligibility edits or flags. Describe the steps taken to identify and resolve these issues. Also, indicate the steps to be taken when a reject or C-code, comment code, or other edit or flag is resolved. For example, if a non-U.S. citizen's status for Title IV aid was not confirmed through the Department of Homeland Security's database match and there is a conflict after receiving the secondary match, the financial aid administrator must request a third step verification using the SAVE system, indicate exactly how the financial aid administrator must do this.

You may wish to cross-reference the postscreening, document collection and tracking, and forms sections of the manual.

Response:

If an ISIR is received with a C Code that requires a document submission, then Student Forms populates the required documentation or student action needed to resolve the C Code.

Resources:

NSLDS Transfer Student Monitoring & Financial Aid History User Guide and Record Layouts
2025-26 FAFSA Specifications Guide, Vol. 7
2025-26 FAFSA Specifications Guide, Vol. 6

7.2.1 Social Security Administration (SSA)

Policies

Response:

If the SSA did not confirm the citizenship status of the student, the school must obtain documentation to verify the citizenship status or eligible non-citizenship status of the applicant to resolve the issue and move forward with aid packaging. If the comment code cannot be resolved, then the student is not eligible for Title IV aid.

Documentation that can be used for U.S. Citizenship status:

- U.S. birth certificate
- U.S. passport card or book (signed, current and not expired)
- U.S. Certificate of Citizenship or Naturalization (signed)
- U.S. Birth Abroad Certificate
- U.S. Certificate of Foreign Service Birth

Documentation that can be used for Eligible Non-Citizenship status:

- Permanent Resident Card (front and back)
- Passport page stamped "Processed for I-551" along with pages identifying the student
- Form I-94 (departure record) stamped "Processed for I-551"
- Form I-94 stamped one of the following:
  - Refugee
  - Asylum granted

- Parolee (I-94 confirms paroled for a minimum of one year – include documentation of permanent residency application, if applicable)
- T-Visa holder
- Cuban Haitian entrant

If the newest ISIR confirms eligibility, the student will be cleared and awarded. If the newest ISIR does not confirm eligibility, the student's information will be sent to the DHS-SAVE process. Once confirmed as eligible by DHS-SAVE, the student will be cleared and awarded.

Procedures

Response:

- Determination of status: The FAFSA generates a C Code that lets the FAA know that additional information is needed before the student can be determined as eligible for aid.
- Notification of status: The student's Student Forms account will populate an outstanding requirement for the student to submit documentation regarding their citizenship/eligible non-citizen status.
- Student submits documentation: The student uploads the required documentation into their Student Forms account.
- Review of documentation: The FAA reviews the documentation to determine if the student is eligible for aid immediately or needs additional confirmation.
- Determination of eligibility: If the FAA determines that the student is eligible based on the documentation provided by the student or additional confirmation, the student requirement and C Code are cleared, and they are eligible for aid.

The student must provide documentation of U.S. citizenship status (U.S. passport, Certificate of Naturalization or Birth Certificate). If the student is an eligible non-citizen, the school must make a correction and provide the Alien Registration Number based on the documentation provided by the student. Then the C Code can be cleared, and the student can be cleared and awarded.

7.2.2 Department of Homeland Security (DHS)

Policies

Response:

Student Secondary Confirmation

MCCD has established the following procedures relative to the secondary citizenship confirmation process for Title IV financial aid applicants who have indicated that they are eligible non-citizens or permanent residents of the United States. If the ISIR does not confirm eligible Title IV applicant status and the student submits reasonable evidence of eligible status, the school will initiate the secondary confirmation process through the Immigration and Naturalization Service (INS) and Department of Homeland Security (DHS).

- All students who indicate an eligible status, but whose eligible status is not confirmed by the tape match as evidenced on their ISIR or SAR must be given a copy of these procedures.
- Students have 30 days from the date the institution receives the ISIR/SAR or 30 days from the student's receipt of this document (whichever is later) to submit documentation for consideration of eligible non-citizen status.
- Failure to submit the information by the deadline prevents the institution from disbursing any Title IV funds or certifying the student as eligible for any Title IV funds.
- The institution will not make the decision regarding "eligible non-citizen" status without the student having the opportunity to submit documentation supporting a claim of eligibility.
- Students must submit documentation of their current immigration status to the Financial Aid Office. This Documentation must be official documents from the INS. To initiate the required process, students must submit INS documents which are legible and which demonstrate the latest status with INS.
- The institution will initiate secondary confirmation within 10 business days of receiving both the

output documents and the student's immigration status documents.

Procedures

Response:

DHS assigns an Alien Registration Number (ARN) to most non-citizens, which FSA uses to identify which applications must be sent to DHS for immigration status verification. If the applicant indicates on the FAFSA form that they are an eligible non-citizen and provides an ARN, identifying information is sent to the DHS for eligible non-citizen verification.

The results of the match will be on the output documents by a match flag in the "FAA Information" section under the headings DHS Primary Status, DHS Secondary Match Status (Secondary Confirmation Flag), and DHS Case Number on the FAFSA Submission Summary and ISIR. There will also be a comment about the results in the output document.

If the match is unsuccessful, the DHS match status will determine the student's eligible non-citizen status category:

- Successful Match (Y primary match status). Comment code 154.
- Record was not sent to DHS due to data entry errors (blank match status). Comment codes 022, 019 or 020.
- Student's non-citizen status/category has not yet been confirmed (N primary match status and C Code). Comment code 155.
- A case has already been submitted (D primary match status). Comment code 288.
- An invalid A-Number was provided (I primary match status). Comment code 289.

There are a number of acceptable documents outlined in Section 7.2.1 Social Security Administration (SSA).

DHS Secondary Match Statuses and Comment Codes

- Y, 292: Student's eligibility confirmed. Aid can be processed.
- C, 294: Student's eligible non-citizen status has not yet been verified. MCCD must wait ten (10) business days for another ISIR with an updated match result. If there is no update, MCCD must begin the third-step verification process.
- N, 293: The student's immigration status/category was not confirmed. MCCD must now perform third-step verification.
- P: Pending the result of Secondary DHS Match, the student's case is still processing. MCCD must wait for an updated ISIR with a secondary match status before proceeding. There is no Comment code associated with this match status.

DHS Case Number on the ISIR

When a record is processed through the FPS match with DHS, a 15-digit case number is assigned to the student and printed in the "FAA Information" section of the FSS and ISIR. This 15-digit number, along with the applicant's date of birth, is needed to access the student's DHS-SAVE record, and to submit a third-step verification request through DHS-SAVE.

Third-Step Verification

If the student did not pass secondary confirmation or if MCCD has conflicting information about their immigration status/category after receiving a primary or secondary match result, the FAA must review the record for third-step verification.

- Request the student's most current, unexpired immigration document. When it is submitted, make a copy of it.
- Carefully review the student's immigration documentation against the status/category and document descriptions below.
- Determine whether the student's immigration documentation supports eligibility for Title IV aid. If it does not support an eligible status, the student is not eligible now but may be eligible when they provide eligible non-citizen documentation. Third-step verification should not be performed for this

student.

Only when students have unsuccessful SSA and DHS matches, or if there is conflicting information, MCCD must perform third-step verification using the DHS-SAVE system to confirm that their documentation supports one of the following non-citizen status categories:

- Lawful permanent residents
- Conditional resident aliens
- Conditional entrants
- Refugees
- Persons granted asylum
- Persons paroled into the U.S. for at least one year
- Ukrainian citizens and nationals
- Afghan citizens and nationals paroled into the U.S. between July 31, 2021, and September 30, 2023
- Cuban Haitian Entrants
- Victims of human trafficking/Battered immigrants-qualified aliens
- Jay Treaty students.

If MCCD is required to verify a student's citizenship status, the required documentation will be populated in Student Forms. Students are informed that failure to provide additional documentation demonstrating their eligible non-citizenship status may result in their inability to receive Title IV funds. The DHS-SAVE results are added to the student's Student Forms account.

7.2.3 [Reserved]

Policies

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7.2.4 National Student Loan Data System (NSLDS)

Policies

Response:

All C Codes must be cleared before a student is awarded. If a C Code is not resolved, the student will not be awarded Title IV funds. See Section 7.2 Clearance of Database Matches, Reject Codes, C Codes, Comment Codes and Other Edits for a list of all NSLDS Comment Codes.

If the student's FAFSA indicates that the student is close to or has exceeded the federal aggregate loan limit or owes an overpayment, the FAA must review the student's NSLDS record on the NSLDS website. These conditions will need to be cleared before additional federal grants can be awarded. If the student has exceeded their federal loan aggregate loan limits, a Reaffirmation Agreement will need to be submitted before additional federal grants can be awarded.

Procedures

Response:

All NSLDS C Codes must be cleared before a student is awarded. If a C Code is not resolved, the student will not be awarded Title IV funds. The resolution required for all NSLDS C Codes can be found in the 2025-2026 FAFSA Specification Guide, Volume 7 - Comment Codes.

7.2.5 Department of Justice (DOJ)

Policies

Response:

On December 27, 2020, the FAFSA Simplification Act was enacted into law as part of the Consolidated Appropriations Act, 2021. The Act made many important changes to the Higher Education Act of 1965 (HEA) and the FAFSA, which eliminated the suspension of eligibility for Title IV aid for drug-related convictions that occurred while receiving Title IV aid.

7.2.6 Department of Defense (DOD)

Policies

Response:

On December 27, 2020, the FAFSA Simplification Act was enacted into law as part of the Consolidated Appropriations Act, 2021. The Act made many significant changes to the Higher Education Act of 1965 (HEA) and the FAFSA, which eliminated the requirement for male students to register with the Selective Service before the age of 26 to be eligible for Title IV aid.

The Department of Defense match is currently used to determine eligibility for the IASG. SAR Comment Code 298 sometimes appears on the student's ISIR but does not create a C Code.

7.2.7 [Reserved]

Policies

Response:

This was formerly used for Drug Convictions.

On December 27, 2020, the FAFSA Simplification Act was enacted into law as part of the Consolidated Appropriations Act, 2021. The Act made many significant changes to the Higher Education Act of 1965 (HEA) and the FAFSA, which eliminated the suspension of eligibility for Title IV aid for drug-related convictions that occurred while receiving Title IV aid.

7.2.8 Unusual Enrollment History (UEH)

Policies

Response:

NSLDS flags students whose record contains unusual enrollment information. This may result in comment code 276 for possible enrollment pattern problems which the school may need to resolve or comment code 277 for questionable enrollment patterns which the school must resolve.

Procedures

Response:

276 Code: The FAA must review the student's enrollment and financial aid records to determine if, during any of the last four award years, the student received a Pell Grant or a Direct Loan at MCCD. If so, no additional action is required. If not, using information from the NSLDS, the FAA must identify all institutions where the student received a Pell Grant or Direct Loan for any of the previous four award years. The FAA must then determine whether academic credit was earned at each of those institutions during the award year for which the student received a Pell Grant or Direct Loan. Based on those determinations, discussions with the student may be necessary.to get additional information as to why no credit was earned.

277 Code: Using information from the NSLDS, the FAA must identify all institutions where the student received a Pell Grant or a Direct Loan for any of the last four award years. The FAA must then determine whether academic credit was earned at each of those institutions during the award year for which the student received a Pell Grant or a Direct Loan. Based on those determinations, discussions with the student may be necessary.to get additional information as to why no credit was earned.

Resources:

GEN-13-09
GEN-15-05
Electronic Announcement, 1/10/17
2024-25 FSA Handbook, Vol. 1, Ch. 3, February 2024
Electronic Announcement, 11/23/22 (GENERAL-22-93)
Electronic Announcement, 1/20/16

7.2.9 Department of Veterans Affairs

Policies

Response:

The FAFSA Simplification Act aligns the definition of veteran with the definition used by the U.S. Department of Veteran Affairs (VA) to determine veterans' benefits. Generally, a veteran is an individual who:

- Served on active duty in the U.S. armed forces (Army, Navy, Air Force, Marines, Space Force, or Coast Guard) for other than training and who was discharged or released under a condition other than "dishonorable," or

- Served on active duty for training or inactive duty for training in the U.S. armed forces and was disabled from injury incurred or aggravated in the line of duty.

Members of the National Guard or Reserves are only considered veterans if they were called up to active federal duty by presidential order for a purpose other than training. It does not matter how long the active duty lasted or if the student returned to reserve status afterward, but, as with the other qualifying veterans, the student must have had a character of service that was not "dishonorable."

The FAFSA form also tells students to answer "Yes" to the question about veteran status if they are not yet a veteran but will be by June 30, 2026.

Students serving in ROTC or currently attending a U.S. military academy are not veterans. Additionally, students who attended a U.S. military academy or military preparatory school but were discharged prior to commission (commonly known as "early exit cadets") are not veterans.

Procedures

Response:

If a student indicates they are a veteran in Question 5, the FPS performs a match with VA records to confirm that status. The VA sends the result back, which appears as a match flag in the FAA information section of the output document. For VA Match Flags 2, 3 and 4 (listed below) a comment and a C Flag will appear on the FSS and ISIR only if veteran status is the sole reason that the student would be independent.

- VA Match Flag 1: Confirmed.
- VA Match Flag 2: Not a Qualifying Veteran.
- VA Match Flag 3: Not found by VA.
- VA Match Flag 4: Active Duty. If a student is currently on active duty, they are not veterans yet. However, if their active duty will end by June 30, 2025, they count as a veteran for purposes of determining dependency status.

If the student is not a veteran and will not be one by June 30, 2026, they must correct their answer to Question 5 and invite at least one parent to contribute to their FAFSA form.

7.3 Review of Subsequent ISIR Transactions and Postscreening

Note: You may wish to create a subsection that details the policies specific to each postscreening process (e.g., 7.3.1 Defaults, 7.3.2 Overpayments, 7.3.3 Change in Disability Status, etc.). For example, in the case of defaults, you would indicate what documentation is necessary to clear the default status, as well as who is responsible for reviewing that documentation. If you create a separate subsection for each postscreening process, be sure to include the specific procedures that address each one.

Policies

Explain why the school must review subsequent ISIR transactions, such as for any changes made by the student or parent or updates due to postscreening processes (e.g., defaults, overpayments, Unusual Enrollment History, transfer student monitoring, etc.). Indicate the time frame within which you review them (e.g., weekly, biweekly, monthly). Also, indicate who is responsible for reviewing these subsequent transactions.

Resources:

2024-25 FSA Handbook, Vol. 1, Ch. 3, February 2024
2025-26 FSA Handbook, Vol. AVG, Ch. 5
NSLDS Transfer Student Monitoring & Financial Aid History User Guide and Record Layouts

Response:

When subsequent ISIRs are received, they must be reviewed to determine if changes that were made impact a student's eligibility, even if the student was already awarded.

- Subsequent ISIRs with a process date prior to the student's last date of attendance in the current award year must be reviewed and, if selected, verified to resolve any change affecting the SAI and eligibility.
- If a subsequent ISIR is received for a student whose file has already been verified, the ISIR does not need to be verified again but should be reviewed for possible errors and issues affecting eligibility that would have been effective while the student was enrolled at MCCD.

- If selected for verification with a process date after the student has ceased attendance, verification is not required unless the student returns for a later period of enrollment within the same aid year.

If, as the result of any of these scenarios, the SAI and award change, any over award must be resolved. If the SAI is lower and Pell Grant eligibility greater, the student is eligible for the higher Pell amount if the disbursement can be made within federal deadlines for verification and disbursement. Awards disbursed after the end of a term must be based on completed classes only.

Procedures

The procedures for the review of a subsequent transaction should include, but are not limited to, the following information:

- How subsequent ISIR transactions are identified
- What items are reviewed (e.g., checked for subsequent verification selection, C-code problems, unauthorized student/parent changes, NSLDS postscreening, etc.)
- How problems are resolved (e.g., procedures for contacting students)
- What actions are taken if student becomes eligible or ineligible for Title IV aid

You may want to cross-reference the manual section that addresses clearance of database matches, reject codes, C-codes, comment codes, and other student eligibility edits for flags.

Response:

The FAA must review all subsequent ISIR transactions that are received. If any additional documents are needed to clear up a subsequent C Code, the student will be required to submit that documentation before any future disbursements can be made.

Notification Upon Revision of a Financial Aid Offer:

Upon revision of the financial aid offer due to changes in enrollment status, updates to FAFSA applications that trigger a subsequent ISIR, receipt of outside resources or other instances, students will receive a revised financial aid offer. These are triggered manually by the FAA because of any changes made to a student's original financial aid offer.

7.3.1 Defaults

Policies

Response:

A student is not eligible for FSA funds if they are in default on a Federal Direct Loan or owe an overpayment on an FSA grant or loan, and they have not made a repayment arrangement for the default or overpayment. Also, neither the parent nor the student may be in default or owe an overpayment on an FSA loan or grant in order for a parent to receive a PLUS loan. A student is ineligible if they inadvertently exceed the annual or aggregate loan limits.

Procedures

Response:

- When the FAFSA is processed, the FPS matches the student against the NSLDS to see if they are in default, owes an overpayment, or has exceeded the loan limits. Students with a C Flag on their ISIR indicate a problem that must be resolved. Also, NSLDS uses a postscreening process to inform schools about changes to a student's financial aid history such as a defaulted loan, overpayment, or loan limit problem.
- Students that inadvertently exceed the annual or aggregate loan limits can regain eligibility by repaying the extra amount borrowed or by making satisfactory payment arrangements with the loan servicer.
- Students in default on an FSA loan can resolve the default by repaying the loan in full (including consolidation), making satisfactory repayment arrangements, or through loan rehabilitation.
- If the FSS or ISIR shows that the student is ineligible because of a default, but the student has resolved the default, the student must provide documentation from the holder of the defaulted loan proving the student is no longer in default and is in good standing.

7.3.2 Overpayments

Policies

Response:

The financial aid office requires all C Codes for overpayments to be resolved for applicants identified on the ISIR.

Procedures

Response:

The student would need to provide an Overpayment Clearance letter from ED to clear the overpayment.

7.3.3 Change in Disability Status

Policies

Response:

If a student's ISIR indicates that the student loans have been discharged due to a disability, the FAA does not need to do anything. A discharge does not impact a student's ability to receive other types of financial aid.

Procedures

Response:

If the student indicates they want to pursue federal student loans, then a signed physician certification is required. The physician must assess the impact of the student's disability against the ability to earn income in light of what the student would normally be able to earn without the disability and/or illness (this calls for a judgment decision as to the ability to earn income despite the disability).

7.3.4 Postscreening Process

Policies

Response:

The financial aid office requires all C Codes for NSLDS postscreening to be resolved for applicants identified on the ISIR.

Procedures

Response:

Since there are various reasons that an ISIR would have an NSLDS postscreening, the FAA is required to resolve all postscreening C Codes before making any future disbursements.

7.4 Additional Institution-Specific Data Elements

Policies

Resources:

668.54(a)(3)

It is important to note that not all data elements an institution uses to calculate a student's aid eligibility are required verification data elements for Title IV financial aid programs. For instance, many institutions use family financial information such as home equity to calculate eligibility for institutional funds. In that case, treatment of such items should be described in the file review policies and procedures.

List each additional data element your institution collects and uses in its need analysis calculation(s) for institutional funds (i.e., data elements not included in the Federal Methodology need analysis calculation, such as home equity). Explain the purpose for including each of these data elements in your institutional need analysis calculations. Also, describe and list the documents the school requires to verify each additional data element, as well as any institutional deadlines associated with verifying additional data.

You may want to cross-reference the data elements to be verified section of the manual.

Response:

Since there are various reasons that an ISIR would have an NSLDS postscreening, the FAA is required to resolve all postscreening C Codes before making any future disbursements.

Procedures

Include a step-by-step description of how these additional institution-specific need analysis data elements are included in the file review process. For example, if the financial aid staff member is responsible for recording changes to these additional institution-specific verification data elements electronically on the student system, or manually on a paper file review checklist, indicate how this is done. Also, explain how documentation is requested and processed by the financial aid office.


A good practice might be to create a file review checklist, which includes all of the Title IV financial aid verification items and other institution-specific file review elements. This checklist might be duplicated and used by financial aid staff members who review student files.

Response:

Since there are various reasons that an ISIR would have an NSLDS postscreening, the FAA is required to resolve all postscreening C Codes before making any future disbursements.

7.X - Reserved for Institutional Use

This section is reserved for any institution-specific area of policies and procedures not covered in previous sections. It may be necessary to include several sub-sections of institution-specific content within this area. If there is no institutional content, simply leave the area blank, or mark the box Complete as preferred.

Section 8: Student Budgets

8.1 Various Student Populations

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 schools should include in this section of the policies and procedures manual.

Policies



A postsecondary institution establishes its budget based on average costs for the categories of tuition/fees, books/course materials/supplies/equipment, transportation, living expenses (e.g., room/board), and personal/miscellaneous. In addition, standard costs for dependent care, disability-related expenses, professional license, certification, or credential, and Title IV loan fees are added for affected student populations. The costs for each category are determined annually through a data-driven review of consumer and student surveys that are evaluated to ensure effective standards to support a moderate standard of living. Efforts are taken to reduce systemic bias in determining the student categories and associated costs to accurately reflect the experiences of the students within each student category.

Resources:

P.L. 117-103
P.L. 116-260
GEN-22-15
Federal Register, 11/4/22, pp. 66683 to 66684



The *FAFSA Simplification Act,* enacted into law with the *Consolidated Appropriations Act, 2021,* amended by the *Consolidated Appropriations Act, 2022,* modified several components in the COA. These changes were implemented for the 2023-24 award year. Information regarding these specific changes are included in the following sections that correspond to the specific COA components.

List the various student populations for which you construct separate budgets. Explain the reasons why each group should be treated differently. Examples of possible budget categories include:

- Freshmen
- Upperclassmen
- Undergraduates
- Graduate or professional students
- Doctoral students
- Students in study-abroad programs
- Students attending under consortium or contractual arrangements
- Students who pay out-of-state tuition
- Students living in institutional housing (with or without dependents)
- Students living off campus
- Students living at home with parents
- Students living in military base housing or receiving a basic housing allowance

Response:

Determining eligibility for financial aid at Merced Community College District (MCCD) largely depends on the cost of attendance (COA). MCCD provides a detailed breakdown of all necessary expenses for undergraduate students. These 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.

The COA is based on the cost of a student's tuition and fees and estimated cost of books, course materials, supplies and equipment, living expenses (food and housing), transportation, miscellaneous personal expenses and Title IV loan fees for the academic year (fall and spring semesters). Costs for dependent care and disability-related expenses may be added when self-identified.

Procedures

Resources:

Describe the steps to assign a particular budget to a given student. For example, the computer system may sort records by student type, or a financial aid staff member may manually assign a budget to each student. Indicate where or how the information needed to assign a budget is obtained. Additionally, housing information may be obtained from residence life. Books, course materials, supplies, and equipment information may be provided by the student's program of study, the bookstore, or from student surveys.

GEN-22-15

Response:

When the Institutional Student Information Record (ISIR) is loaded into the Ellucian Colleague system, a COA is established for the student based on whether the student lives off campus or with parents, the program of study, and the grade level that Ellucian Colleague has identified for the student. Initially, the financial aid office assumes that all students will be enrolled as full-time students. Those who will not enroll for full-time hours must alert the financial aid office of their enrollment status.

The costs for each category are determined annually using the California Student Aid Commission (CSAC) student expense budget, along with the MCCD local fees and non-resident fees.

8.2 How Budgets are Derived and Updated



NASFAA Monograph, *Developing the Cost of Attendance*, defines acceptable expenses and outlines consistent approaches for establishing reasonable levels for those expenses, while avoiding specific citations of figures, averages, or ranges. Due to differences between different categories of students, it is recommended that different budgets be created to reflect these different circumstances. It is available on NASFAA's website under Publications from the Tools and Resources tab.



The NASFAA FAFSA Simplification Implementation Checklist for Schools is a tool for schools to implement changes to the cost of attendance that were effective the 2023-24 award year. It is available on the NASFAA website under Policy from the Advocacy, Policy & Research tab



Best Practices to Reduce Implicit Bias in the Budget

• Check Surveys for Nonresponse Bias – When surveying students, check the demographic data of the survey respondents against student demographic averages to ensure that you captured responses from a representative sample. If the survey does not include a representative sample, who has not contributed to the calculation of average costs? How might the cost data for those students be gathered more effectively?

• Test the Budget Efficacy Using Personas – After setting a budget, create a variety of student personas to ensure that the budget would provide a moderate standard of living for most students across all demographics. Consider what costs are a special circumstance that should only be increased through professional judgment (PJ) and what costs are normal for a particular student population, even if that student population is a minority population.

• Analyze Budget Appeals to Inform the Standard Budget – Routinely analyze budget appeals that have been submitted to determine whether there is systemic bias in the standard budget. What are the most requested appeal categories? Who does the standard budget not serve?

• Use Budget and Appeal Data to Advocate – Financial aid administrators have data that could be used to advocate for student support in the wider institutional system. Disaggregated data showing that a particular student population is struggling to access affordable housing, food, or transportation could result in changes elsewhere in the system that could better support student success and financial wellness.

Policies

List the required basic components used to derive a student budget. The basic components are:

- Tuition and fees
- Books, course materials, supplies, and equipment (An allowance for costs required for all students enrolled in the same program of study. Includes a reasonable allowance for the upfront purchase

Resources:

668.16(b)(3)
2025-26 FSA Handbook, Vol. 3, Ch. 2
HEA 472

or rental of equipment (e.g., computer), supplies, or materials.)

- Living expenses (e.g., room and board)
    - *Food costs:* A standard allowance reflecting three meals a day, which may be either on- or off-campus
    - *Institutionally-owned housing costs*: An allowance for housing, with or without dependents, based on either the average or the median amount for similar-type residents.
    - *Off-campus housing costs:* An allowance for housing that reflects off-campus housing costs (e.g., rent or other types of housing costs).
    - *Dependent students living with parents:* A standard allowance for living costs greater than zero.
- Transportation (An allowance which may include such costs between a student's residence and campus or place of work.)
- Miscellaneous personal expenses (for students enrolled at least half-time)

The basic budget components are the same for students taking all or a part of a program via distance education.


The sources used to determine budget component costs (e.g., averages from the College Board, Consumer Expenditure Survey, or Consumer Price Index and survey students to obtain cost and budget data).

If your school has written agreements with other institutions (e.g., consortium or contractual arrangements), the budget must reflect all hours in which a student enrolls at all participating schools that are applicable to the student's degree or certificate. Budgets must also be calculated or recalculated to include only costs for periods of enrollment of other than nine months (e.g., summer periods).

If your school has on-campus housing and uses a separate budget category for these students, include how you verify the residence status for students who may or may not have initially indicated on-campus housing from those who are actually residing on campus.

Your policy should address:

- The rationale used to determine the amount assigned to each budget component for each category you listed in section 8.1
- The prohibition of certain types of adjustments to the tuition and fees component of the COA
    - Prohibition against offering tuition discounts, and subsequently reducing the tuition and fees component of the COA, to students who pay tuition early
    - Prohibition against including overtime charges in the COA for students who fail to complete a program within the established timeframe
    - Prohibition against including finance charges in the COA
    - Prohibition against including the hours taken in an adult education component when determining a student's COA and enrollment status
    - Prohibition against including educational expenses for coursework provided by an ineligible institutions which exceeds the regulatory maximum under a written arrangement
    - Prohibition against including educational expenses associated with a gap-year experience (e.g., travel, experiential activity, and/or travel)
    - Prohibition against including educational expenses for first-time distance educational programs without recognized accrediting agency approval
    - Prohibition of including educational expenses for instruction provided at a Title IV-eligible foreign institution in which:

GEN-22-15
Federal Register, 9/2/20, p. 54781
HEA 472(1)
HEA 472(2)
HEA 472(3)
HEA 472(10)
600.51(d)
668.5(d)(3)(i)
668.5(g)
GEN-15-09
668.5(h)(2)
668.8(m)
GEN-23-07
GEN-22-07
Electronic Announcement, 3/5/19

♦ The entire course is delivered via distance education

♦ Any coursework, work, special studies, or research which exceeds the 25 percent maximum threshold provided at a Title IV-eligible or ineligible U.S. institution

- Whether actual or average costs are used
- When and why adjustments are made to student budgets
- Students attending under consortium or contractual arrangements
- How often budget components are reviewed and updated (e.g., annually)

Response:

The student budget is an integral component in the financial aid equation. Standard student budgets reflecting the average student population COA at a modest, but adequate standard of living are used to award financial aid.

The director of financial aid (DFA) collects information to prepare standard costs on an annual basis. All costs are based on limitations to the amounts and other criteria set forth in the federal regulations.

Direct Costs: In accordance with state guidelines, the MCCD Board of Trustees sets fees and non-resident tuition costs. Since the determination of state tuition may not occur until late summer or may be revised during an academic year, an estimate of tuition charges is used to award aid until actual costs are approved. This estimated information is established by using previous year's costs plus an estimated percentage increase. Students who do not establish California residency are charged with an out-of-state fee. An average tuition cost for full-time students is used to determine the exact tuition cost for the standard budget.

Indirect Costs: Indirect costs consist of the following types of expenses incurred by students:

- Books and supplies,
- Food and housing,
- Transportation, and
- Miscellaneous items.

Food and housing expenses are divided into two categories:

- Living with parents.
- Living off campus.
- Miscellaneous items include personal expenses for clothing, toiletries, medical/dental, recreational, etc.

Students enrolled in less than six units will have only tuition, fees, books and transportation calculated for the COA budget

Upon request, the financial aid office may review and, if appropriate, adjust a student's budget. Students should submit appropriate documentation.

Examples of changes to standard budgets include:

- Childcare: The cost of childcare for students with dependent children may be added to a standard budget.
- Special needs: Disabled students or students with special problems may be allocated funds to cover reasonable costs associated with disabilities or problems that are not already covered by other resources.
- Enrollment in Cooperative Education: Additional expenses related to cooperative education study and work on or off campus.
- The purchase or upgrade of a computer.

Procedures

Your procedures should include:

- How budget amounts are derived (including any averages used)
- How budget amounts are calculated or adjusted to reflect enrollment for periods of other than nine months
- A description of the methods used to derive, review, and update budget component amounts (e.g., surveys, questionnaires, student documentation, interviews, etc.)
- How budgets are documented (e.g., in the student's file or on a budget assignment screen in the computer system)
- How budget assignments are verified for consistency and accuracy

Response:

The costs for each category are determined annually using the California Student Aid Commission (CSAC) student expense budget, along with the MCCD local fees and non-resident fees.

8.3 Additional Costs

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

- Dependent care expenses
- Federal loan fees
- Study abroad expenses
- Additional costs for students with disabilities when those costs are not paid by another agency or entity
- Cooperative education program expenses
- Costs to obtain a certification, license or first professional credential
- Living expenses for less-than-half-time students for not more than three semesters, of which no more than two may be consecutive, at the institution's option

Resources:

HEA 472(a)(8)
HEA 472(a)(9)
HEA 472(a)(10)
HEA 472(a)(13)
HEA 472(a)(14)
HEA 472(a)(12)
GEN-22-15
GEN-06-05
HEA 472(b)

Policies

Explain:

- The circumstances under which your school will or will not include additional costs in a student's budget
- The timing of budget adjustments (e.g., before packaging, after financial aid offers, etc.)
- Whether the student must request a budget review and under what circumstances the financial aid office initiates it
- Who is responsible for determining additional costs
- Whether certain forms of aid are used to cover certain additional expenses
- The types of documentation required to substantiate additional costs

Resources:

2025-26 FSA Handbook, Vol. AVG, Ch. 5
2025-26 FSA Handbook, Vol. 3, Ch. 2
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024

The law does not specify what documentation you must collect for expenses such as dependent care or disability-related expenses. You can document these expenses in any reasonable way, such as documenting an interview with the student or obtaining a written statement from the student or other appropriate sources.

Response:

The following cost components must be added for students upon request or if the school has another way of identifying those students and assigning the cost component when constructing the COA, as applicable:

- Dependent care expenses.
- Disability-related expenses (when costs are not paid by another agency or entity).
- Study abroad expenses.
- Cooperative education program expenses.

- The purchase or upgrade of a computer.

Procedures

Describe:

- How students incurring additional costs are identified or made aware of the possibility to increase their budgets
- The process by which a student requests a budget increase (e.g., by filling out a form, writing a letter, etc.)
- How an existing financial aid offer package is modified
- How the student's record is annotated and documented to show the additional cost component, such as:
  - Whether it is a manual or automated process
  - How proper documentation is assured
  - Where and in what format supporting documentation is kept
- How students are notified of any budget changes or appeal outcomes

You may wish to cross-reference the forms and correspondence and the document collection and tracking sections of the manual.

Response:

See Section 10: Professional Judgment (PJ).

8.4 Budget Restrictions

Certain student categories are restricted with regard to allowable budget components. The restricted budget categories are:

- Correspondence students
- Incarcerated or confined students enrolled in a prison education program (PEP)
- Less-than-half-time students

Resources:

HEA 472(b)
HEA 472(a)(6)
HEA 472(a)(7)
GEN-22-15
2025-26 FSA Handbook, Vol. 3, Ch. 2

Policies

Describe your policies addressing the budget exceptions for any of these categories that apply at your school. Include a description of the budget components allowed for each category.

Response:

Less Than Half-Time (LTHT) Students: The COA for LTHT students must include only the following budget components:

- Tuition and fees.
- Books, course materials, supplies, and equipment.
- Transportation.
- Dependent care, disability-related expenses, study abroad expenses and cooperative education costs (if applicable upon request).

Under the statute, living expenses (food and housing) may be (but are not required to be) included for a LTHT student up to three semesters or the equivalent, with no more than two semesters being consecutive, if the student has such costs. MCCD may include these costs on a case-by-case basis. Miscellaneous personal expenses cannot be included for LTHT students.

Procedures

Explain:

- How the school derived the amount for each component
- How students in these groups are identified

- How the financial aid office ensures the student budgets for these groups are correct and/or adjusted accordingly

Response:

A student's enrollment status is determined by the credit hours that are available in the Ellucian Colleague system. If a student's enrollment status changes, the FAC will adjust the student's award accordingly.

8.5 Budget Waivers

When a specific component of a student's budget is waived or explicitly paid by another source, special treatment may be necessary. Some examples are:

- Tuition and fees waived or paid by another organization, such as an employer or the Workforce Investment Act (WIA) Programs, or housing and food charges waived or paid for a student employed as a resident assistant (RA)
- Sources of state assistance designated as an offset of a specific budget component and thereby excluded from both the student's budget and the other financial assistance

Resources:

HEA 480(j)(3)
2025-26 FSA Handbook, Vol. 3, Ch. 2
GEN-06-05

Policies

Describe in your policy when and how budget components are waived and the documentation used to confirm the waiver.

Response:

The MCCD financial aid office will be notified of all scholarships and outside aid that is designated to be applied to tuition and fees.

Procedures

Explain:

- How the financial aid office is notified of the waiver
- How students are identified
- How the financial aid office ensures adjustments are correctly made to the cost component, and if necessary, the estimated financial assistance

Response:

The student fees office will notify the financial aid office if tuition and fees are waived. The financial aid office will update the student's award if needed. In addition, the financial aid office is included in conversations if other financial aid (OFA) is being awarded.

8.6 Budget Appeals

Policies

Explain when you might consider adjusting a student's budget based on an appeal. Give examples of legitimate reasons for budget revisions. List reasons budget revision requests might be denied. Indicate who is responsible for reviewing appeals. If there is a committee, define its role. Include information about required documentation (if any), time frames by which an appeal must be submitted, and when students will receive a response. You may want to cross-reference the forms and correspondence and PJ sections of the manual here.

Resources:

668.53(c)
HEA 479A(a)
HEA 479A(b)
2025-26 FSA Handbook, Vol. AVG, Ch. 5
668.42(c)

Response:

COA adjustments can be made on a case-by-case basis for a range of added expenses not covered in the student's standard budget as long as the adjustments fit into one of the statutorily defined categories.

See Section 10: Professional Judgment (PJ).

Procedures

Describe the appeal process step-by-step, to include the following:

- How the appeal process is made known to students

- How a student requests a review of their budget
- What documentation is necessary for budget appeals, if any
- How student appeals are routed within the financial aid office
- How the student is notified of the appeal outcome

You may wish to cross-reference the document collection and tracking, and the offering and packaging sections of the manual.

Response:

COA adjustments can be made on a case-by-case basis for a range of added expenses not covered in the student's standard budget as long as the adjustments fit into one of the statutorily defined categories.

See Section 10: Professional Judgment (PJ).

8.X - Reserved for Institutional Use

This section is reserved for any institution-specific area of policies and procedures not covered in previous sections. It may be necessary to include several sub-sections of institution-specific content within this area. If there is no institutional content, simply leave the area blank, or mark the box Complete as preferred.

Section 9: Packaging Financial Aid

9.1 Packaging Philosophies

Policies

Many financial aid offices use the school's mission as the basis for their packaging philosophies and objectives for offering student financial aid funds. Describe your packaging philosophies for offering all types of financial aid, both need-based and non-need-based. Provide information regarding any strategies used, such as leveraging or gapping. State the objectives of these strategies (e.g., to attract a certain type of student, for retention purposes, to aid as many students as possible, to aid the neediest students to the maximum extent possible, etc.).

Describe the roles of any other offices, such as admissions, that are involved in formulating your school's packaging philosophies. Indicate who is responsible for reviewing your packaging philosophies to ensure they reflect the school's mission and are effective in supporting that mission. Describe the measures by which that assessment is made. State what percentage of your student body generally receives financial aid.

Response:

The primary purpose of the Merced Community College District (MCCD) financial aid office is to provide students with financial resources to enable them to pursue a high-quality educational experience. The staff is committed to providing timely financial assistance while complying with all federal, state, and college policies and regulations. The vision is to ensure that all students have the chance to pursue higher education regardless of financial circumstances. MCCD campuses strive to provide innovative and comprehensive financial assistance programs that empower students to achieve their academic and career aspirations.

The MCCD packaging process is designed to effectively address the financial needs of students by utilizing a combination of various forms of financial aid. Funding is distributed on a first-come, first-served basis, subject to the availability of resources. This aid packaging approach aims to provide financial support that comprehensively meets students' financial requirements through diverse types of financial assistance.

Procedures

Describe the process for making changes or adjustments to the institution's packaging philosophies. Are they reviewed on a regular basis or as a part of the institution's strategic planning process? Are there substantive changes to the institution's mission or goals? What is the process for ensuring existing packaging philosophies are aligned with the institution's new strategic objectives?

Response:

Financial Aid Application & Priority Deadline: To maximize eligibility for financial aid, students are required to submit their Free Application for Federal Student Aid (FAFSA) or California Dream Act Application (CADAA) by the state priority deadline of March 2, 2025, and September 2, 2025. Meeting this deadline will ensure consideration for the Federal Supplemental Educational Opportunity Grant (FSEOG), Federal Work Study (FWS), State University Grant (SUG), Middle-Class Scholarships, and new Cal Grant aid.

Need & non-need-based aid: Financial aid at MCCD is divided into two primary categories: need-based aid and non-need-based aid.

Need-Based Financial Aid:

- Need-based aid is designed to help cover the difference between the cost of attendance (COA) at the college and what the student and their family can afford to pay out of pocket.
- The amount of need-based financial aid a student is eligible to receive depends on their financial situation, as provided in the applications for federal, state, or other relevant agencies.
- These applications require detailed financial information (such as income, family size, etc.), which is then used to assess a student's financial need. Need-based aid aims to support students from families with lower financial resources, helping make higher education more accessible.

Non-Need-Based Financial Aid:

- Unlike need-based aid, non-need-based aid is offered without regard to the student's financial situation.
- The COA primarily determines this type of aid, which is the estimated cost for one year of study at the college.
- Non-need-based aid can be offered for reasons such as academic excellence, athletic talent, community service, or leadership qualities. It is given based on merit or achievements rather than financial need.

In summary, need-based aid addresses financial gaps based on what the family can afford to contribute. In contrast, non-need-based aid is offered for merit or specific abilities without considering the family's financial situation.

Determining Financial Need: At MCCD, financial aid can be offered up to the COA with need-based and non-need-based aid. Need-based financial aid plays a crucial role in reducing barriers to higher education for students and families who may otherwise be unable to afford college costs. The college's need-based packaging philosophy is designed to ensure:

- Equal treatment of students with similar financial circumstances.
- Need is the only criteria used to package most undergraduate financial aid.

Calculating Financial Need: The following formula determines financial need:

Cost of Attendance (COA) - Student Aid Index (SAI) = Financial Need

This approach ensures that aid is distributed equitably and supports those who require the most assistance in financing their education.

Calculating Remaining Need: Remaining need, also called unmet need, considers all forms of other financial assistance (OFA) the student can be expected to receive during the student's enrollment for the academic year. When packaging need-based aid, the actual amount offered cannot exceed the student's remaining need, which is identified by the equation:

Cost of Attendance (COA) - Student Aid Index (SAI) - Other Financial Assistance (OFA) = Remaining Need

This approach ensures that aid is distributed equitably and supports those who require the most assistance in financing their education.

9.2 Available Funds and Number of Eligible Students

Policies

Before beginning the packaging process, the financial aid office must know the total amounts and sources of financial aid available for assistance and project the number of students who will receive that aid. In addition, you must periodically assess how expenditures compare to amounts offered and adjust your packaging parameters if warranted. Use this section of your manual to describe in detail the process used to determine the amount of each fund you will offer to your financial aid recipient population.

Begin by listing all financial aid programs over which the school has control, and for each detail the source (e.g., federal, state, institution, etc.) and its recent funding and utilization history at your school. Cross-reference the financial aid programs section of your manual here.

Include the use of historical data (e.g., enrollment patterns, attrition data, funding statistics, etc.) to derive or project available offer amounts. Include the following for each financial aid program:

- Average financial aid offers
- Number of students funded
- Final percentage of available funds utilized
- Individuals involved in the budgeting process and determination of amounts

Using this information, project how much you can provide from each program to avoid over- or under-

utilization of funds.

Response:

Before beginning the packaging process, the financial aid office must know the total amounts and sources of financial aid available for assistance and project the number of students who will receive that aid.

- Federal Direct Subsidized and Unsubsidized Loans: The financial aid office determines the amount of Federal Direct Loans by reviewing the students' grade level, enrollment status, and aggregate loan limits. The Department of Education (ED) governs these amounts.
- Federal Direct PLUS Loans: The MCCD does not offer Parent Federal Direct PLUS Loans.
- Federal Pell Grant: The Federal Pell Grant is determined by multiple factors, including the SAI, the student's dependency status, family size, and adjusted gross income (AGI) of the student and/or the parent, and the state of legal residence. The Ellucian Colleague system is programmed to know the correct Pell Grant amount the student should be awarded based upon the data from the Institutional Student Information Record (ISIR).
- Federal Supplemental Educational Opportunity Grant (FSEOG) program: Pell Grant recipients with the lowest expected SAI (-1,500) will be considered first for FSEOG. The award amount is $800 annually, split evenly between the fall and spring semesters.
- Federal Work Study (FWS): Since funds are limited, priority is given to continuing undergraduate, stateside students who are currently employed in the FWS program.
- Educational Opportunity Program (EOP) grants: Provides college access to first-generation students whose educational and economic circumstances have limited their college opportunities.
- California State Grants:
  - The California Student Aid Commission (CSAC) offers the following Cal Grants:. \Cal Grant B,
  - Cal Grant C,
  - Extended Opportunity Programs and Services (EOPS),
  - CARE Program,
  - Chafee Grant,
  - California College Promise Grant (CCPG),
  - MC4Free, and
  - Student Success Completion Grant (SSCG).
- All Institutional Aid Programs: The MCCD participates in scholarships that are made available through local and business organizations, community service organizations, employers, state foundations, and any number of other sources. Scholarships are usually based on academic achievement, demonstrated leadership, community involvement, need, or a combination of those factors. Each college posts information about its scholarships when application materials or information is made available to the college.

Students should consult the transfer center, the office of the dean of student services, and the associated student union for information about scholarships. Information on the MCCD Chancellor's Trophy is posted in the student services office at each campus.

For more information, the MCCD provides a Scholarship website.

See Section 3.3 Federal Aid Programs in Which Institution Participates
See Section 3.4 State Aid Programs in Which Institution Participates
See 3.5 Institutional Aid Programs

Procedures

Describe how the financial aid office is notified of all financial aid programs and amounts available to offer from each. For example, if other institutional offices provide funds which the financial aid office is responsible for packaging, (e.g., institutional grants or scholarships), indicate how the financial aid

office is notified. You may want to cross-reference the financial aid programs section of the manual here.

Indicate the source of the information used to project total financial aid to be packaged and explain the process by which the final figures are derived. If multiple individuals are involved in this process, define the role of each.

Response:

See Section 3.3 Federal Aid Programs in Which Institution Participates
See Section 3.4 State Aid Programs in Which Institution Participates
See 3.5 Institutional Aid Programs

9.2.1 Usage of the ACA for Campus-Based Program Amounts

Schools are entitled to deduct an administrative cost allowance (ACA) for each campus-based program's allocation from which it spends funds. The ACA can be used for institutional expenses incurred to administer these programs, but the school is not required to claim it; instead, schools may use their full allocations for student aid. The ACA for these programs may be deducted from any or all of the individual programs. Whether and how the school claims the ACA determines the amount of available campus-based dollars available to offer.

Resources:

673.7
2024-25 FSA Handbook, Vol. 6, Ch. 1, June 2024

Policies

Describe your school's policies regarding the use of the ACA and who is responsible for deciding whether it will be claimed. Explain how this decision affects the packaging process and the campus-based aid dollars available for students.

Response:

MCCD is entitled to deduct an administrative cost allowance (ACA) for each campus-based program's allocation from which it spends funds. The ACA is used for institutional expenses incurred to administer these programs, such as training and personal development of the financial aid office staff. The director of financial aid (DFA) is responsible for deciding whether it will be claimed. By claiming the ACA, it reduces the total amount of funds available to award students.

Procedures

If your school claims the ACA, describe how it calculates the amount for which it is eligible and how it attributes the ACA to the various campus-based programs. Include an example of how these amounts are calculated. If another office is responsible for handling the ACA, indicate the individuals involved and state how the financial aid office obtains the resulting figures. For audit and program review purposes, describe the school's procedures for documenting the ACA was used appropriately. You may want to cross-reference the procedures of any other responsible office.

Resources:

673.7(c)
2024-25 FSA Handbook, Vol. 6, Ch. 1, June 2024

Response:

MCCD only uses $5,000 of the ACA from the FWS and FSEOG programs. The remainder is used to award students. This amount has historically only been $5,000 to use administratively, and it is anticipated that it will remain this amount in future award years.

9.3 Packaging Groups

Policies

Some schools use different packaging techniques or philosophies for different categories or groups of students (e.g., full-time undergraduates, incoming freshmen, returning juniors and seniors, graduate students, students in certain educational programs). Differences may lie in the degree of gapping; in the mix of grant, work-study, or loan offers; or in other aspects of packaging. Describe any packaging categories the financial aid office has established and give a brief explanation of why the category has been established. Explain how you decide the portion of each financial aid program fund dedicated to each category. State the amount or percentage of each source of funds allocated by the school to each category. Cross-reference the consumer information section of your manual here.

Resources:

GEN-22-15

Response:

MCCD utilizes packaging strategies for different groups of students to ensure equitable, compliant, and effective distribution of financial aid resources. These packaging groups are based upon student academic level, program type, and aid eligibility, and they reflect differences in the COA, enrollment

patterns, and available aid programs.

The aid application type categorizes students enrolling at MCCD:

- FAFSA or
- CADAA.
  - Enrollment terms: Fall and Spring, Fall only, Spring only, and Summer only.
  - Differences in packaging may include the amount of federal grant funding, state grant funding, institutional grant funding, FWS eligibility, and federal loan limits, based on financial need, eligibility criteria, and state and federal policies.

Procedures

Describe how students within each category are identified and how you ensure consistent and fair treatment of all students within each packaging group.

Response:

To ensure fair and consistent packaging within each group, MCCD follows these procedures:

- Student Identification:
  - The student's academic career, class level, and program of study are used to determine packaging groups.
  - Financial aid application type (FAFSA or CADAA) and the term of enrollment (Fall, Spring, or Summer) are factored in.
- System Processing:
  - The financial aid system (Ellucian Colleague) is configured with automated packaging plans corresponding to each group.
  - Students are assigned to packaging plans at the time their financial aid application is loaded and evaluated.
- Consistency and Equity:
  - All students within the same group are subject to the same eligibility rules, COA models, and awarding hierarchy.
  - Regular audits and reviews are conducted to monitor discrepancies and ensure adherence to policy.
- Fund Management:
  - Budget offices and financial aid leadership coordinate to allocate funding pools prior to awarding.
  - Adjustments to fund distribution (e.g., reallocation of unused FWS or institutional grants) are made based on actual enrollment and usage trends.
- Communication:
  - Students are notified of their aid packages via the MCCD student portal.
  - Differences in aid by category are documented in public-facing materials and outreach efforts to ensure transparency.

9.4 Determining Amounts

Policies

Once the financial aid office knows the total amount of funds to expend, projects the number of students who will qualify for the various types of financial aid, and sets up its packaging groups, the next step is to determine the amount to be offered from each fund over which the school has control.

Describe your policies for determining minimum and maximum amounts, and who is responsible for this determination. Indicate how this determination is made for students who transfer to a program during the award year. Reference your policy regarding gapping and/or unmet need if these packaging strategies play a role in calculating the amount offered to each student. If you have

different amounts for various student categories, note that here and explain why certain categories have different amounts.

Response:

The financial aid office determines minimum and maximum award amounts for each program based on federal, state, California Community Colleges (CCC) systems, and institutional guidelines.

- Award limits are set using program-specific rules (e.g., Pell scheduled awards, Cal Grant ceilings, and FSEOG & FWS availability.
- For institutional scholarships, the responsible academic department or entity submits awards to the financial aid office for posting.
- The DFA, in consultation with the information technology services (ITS) office, is responsible for setting annual minimum/maximum award thresholds in the system, ensuring compliance by updating the item types.
- Transfer students entering mid-year are packaged according to available eligibility and prorated funding (e.g., Cal Grant, FSEOG & FWS availability).

Procedures

Describe how the financial aid office determines the amount for each program. Describe the use of historical data (e.g., enrollment patterns, attrition data, funding statistics, etc.) to derive amounts. Give details about any formula(s) used to calculate amounts.

Explain how the responsible financial aid administrator monitors fund balances, not only to ensure funds are fully utilized but also to avoid over-expenditure of funds. This may be a collaborative effort between financial aid and other offices (e.g., accounting office, business office); if so, cross-reference the other offices' policies and procedures here.

Response:

The financial aid office uses historical data (enrollment patterns, attrition, and prior-year fund utilization) and current-year allocations to project award amounts.

- Automated formulas in Ellucian Colleague determine awards such as Pell Grant (SAI-based formula), and FSEOG ($800 fixed annual award).
- Manual review applies to FWS (based on the FAC's discretion, job availability, and prior participation) along with department and outside-managed scholarships.
- Fund balances are monitored via monthly reconciliation. The financial aid coordinators (FACs) review balances and provide updates to the DFA, who may reallocate funds or adjust parameters to prevent overspending or underutilization.

9.4.1 Program-Specific Amount Determinations

Policies

Your packaging policies should include information about program-specific criteria, such as:

- Scheduled Awards under the Federal Pell Grant, and the Teacher Education Assistance for College and Higher Education (TEACH) Grant programs
- Making a reasonable portion of campus-based aid available to less-than-full-time and independent students
- Identifying eligible students who qualify for a maximum Federal Pell Grant under the Special Rule and whose parent or guardian died as a result of military service in Iraq or Afghanistan after September 11, 2001 or while actively serving as and performing duties of a public safety officer and as of January 1, 2025 are less than 33 years old
- Selecting students with lowest student aid indexes (SAIs) and Federal Pell Grant eligibility for priority packaging of Federal Supplemental Educational Opportunity Grant (FSEOG)
- Identifying and selecting eligible students for purposes of offering TEACH Grants
- Identifying eligible students who qualify for a Federal Direct Loan (e.g., Direct Subsidized Loan, Direct Unsubsidized Loan, PLUS Loan)

Resources:

686.21
2025-26 FSA Handbook, Vol. 8, Ch. 4
2024-25 FSA Handbook, Vol. 9, Ch. 3, July 2024
2025-26 FSA Handbook, Vol. 8, Ch. 1
GEN-25-02
685.200
675.10(c)
Electronic Announcement, 5/5/25 (GENERAL-25-20)
690.62(a)
The 2025-26 Student Aid Index (SAI) and Pell Grant Eligibility Guide
676.10(b)

You may want to cross-reference the financial aid program section of the manual.

- Identifying and selecting eligible incarcerated students who qualify for a Federal Pell Grant

Response:

Federal Pell Grant awards follow the Department of Education (ED) formula based on the SAI and scheduled awards.

A student may qualify for a Pell Grant under one of three eligibility categories:

- Maximum Pell Grant (Max Pell): $7,395.
- Minimum Pell Grant (Min Pell): $740.
- Calculated Pell Grant: Based on the Student Aid Index (SAI).

Eligibility is determined by multiple factors, including:

- Student dependency status.
- Family size.
- Adjusted gross income (AGI) of the student and/or parent.
- State of legal residence.

Students or contributors who did not file federal taxes are automatically assigned to an SAI of -1500, which qualifies them for the Maximum Pell Grant.

For students receiving a calculated Pell Grant, the award is determined using the following formula:

Pell Amount = Maximum Pell Grant – SAI

The resulting amount is then rounded to the nearest $5 as follows:

- If the result ends in one or two, round down to zero.
- If it ends in three or four, round up to five.
- If it ends in six or seven, round down to five.
- If it ends in eight or nine, round up to the next zero.

Reference: U.S. Department of Health & Human Services (HHS) Poverty Guidelines for 2025

Iraq and Afghanistan Service Grant (IASG) & Children of Fallen Heroes (CFH): Students who meet eligibility criteria for IASG or CFH are awarded the maximum Pell Grant amount for the year, even if their calculated SAI would not otherwise make them Pell-eligible. Eligibility requires that the student has not reached their 33rd birthday as of January 1, 2025.

The parent or guardian must have died in the line of duty as either:

- A member of the U.S. Armed Forces serving on or after September 11, 2001, or
- A public safety officer actively serving at the time of death.

Per current regulations, the Department of Defense (DOD) no longer verifies eligibility. Students must self-identify the FAFSA.

The financial aid system (Ellucian Colleague) flags FAFSA records where the student has indicated IASG/CFH eligibility. The FAC reviews the student record to confirm eligibility documentation if required (e.g., death certificate, agency notification). The award is then system-packaged as a maximum Pell Grant award, subject to sequestration adjustments.
If the student is otherwise Pell-eligible, the system ensures that the IASG or CFH designation overrides the SAI-based calculation so that the student receives the maximum scheduled Pell Grant. Students are notified in writing that their Pell eligibility was determined under IASG/CFH provisions.

Cal Grant awards are state-funded grants administered by the California Student Aid Commission (CSAC). Eligible students may receive a Cal Grant B or Cal Grant C.

2024-25 FSA Handbook, Vol. 9, Ch. 1, July 2024
2025-26 FSA Handbook, Vol. 7, Ch. 2
Electronic Announcement, 4/29/24 (GENERAL-24-50)
2024-25 FSA Handbook, Vol. 6, Ch. 6, June 2024
2024-25 FSA Handbook, Vol. 9, Ch. 2, July 2024
686.11
GEN-24-05
2025-26 FSA Handbook, Vol. 7, Ch. 1
20 U.S. Code Sec. 1070A [HEA Section 401(c)]

New Cal Grant recipients must:

- Submit a FAFSA or CADAA and GPA Verification by May 2, 2025, or September 2, 2025.
- Be a U.S. citizen, eligible non-citizen, or AB 540 eligible.
- Be a California resident.
- Must meet the GPA minimum requirement.
- Be enrolled at least half-time.
- Have income and assets below established ceilings.
- Demonstrate financial need above minimum.
- Meet SAP.
- Not owe state or federal refund or have a default/delinquent student loan.

Renewal Cal Grant Recipient must:

- Submit FAFSA or CADAA.
- Be enrolled at least half-time.
- Have at least 10% remaining Cal Grant eligibility.
- Have all payments from previous year posted on WebGrants.
- Have income and assets below established ceilings.
- Demonstrate financial need above minimum.
- Meeting SAP.
- Not owe state or federal refund or have a default/delinquent student loan.

Awarding Criteria:

- Must be awarded a Cal Grant by CSAC.
- Must meet 2025–2026 Income and Asset Ceiling Guidelines.
- GPA for new students for Cal Grant B is 2.0%.
- Must demonstrate minimum financial need of at least $700.
- Awards are prorated based on enrollment (FT, 3Q, HT)
- Students with Dependent Children Access Award (SWD) only if students are indicated dependent on the FAFSA or CADAA.

FWS funds are limited. Priority is given to continuing undergraduate students who are currently employed in the FWS program. New students may be considered for FWS; however, it will be based upon the availability of funds, which is determined annually.

Awarding Process:

- The FWS coordinator manually packages awards.
- The award amounts vary depending on financial need, job availability, and funding levels.

Eligibility Requirements:

- Students must demonstrate financial need.
- Must be enrolled in at least six units per semester.

FSEOG is awarded to eligible students who meet the following criteria:

- Have an SAI of -1,500.
- Meet the priority filing deadline of April 2, 2025.
- They are enrolled in 12 or more units (full-time status).

- FSEOG funds are limited and are awarded on a first-come, first-served basis until funds are exhausted.
- Award Amount: $800 per year.

Federal Direct Loans are low-interest loans available to eligible undergraduate students who meet the following criteria:

- Submit a valid FAFSA for the academic year.
- Be enrolled at least half-time.
- Maintain Satisfactory Academic Progress (SAP).
- Not be in default on a federal student loan or owe a repayment on a federal grant.
- Complete entrance loan counseling and sign a master promissory note (MPN) prior to the first disbursement.

There are two types of Federal Direct Loans for undergraduates:

- Subsidized: Based on financial need; the government pays the interest while in school at least half-time.
- Unsubsidized: Not need-based; student is responsible for interest at all times.

Procedures

Describe how program-specific criteria are met and who in the financial aid office is responsible for this aspect of packaging.

Response:

The Ellucian Colleague system is configured with the awarding parameters outlined above. Students who are unable to be mass packaged are processed manually.

9.5 Package Construction

Policies

Once the available financial aid and amount parameters are determined, you are ready to write your package construction policies. Institutions are expected to have equitable and consistent packaging policies. Include a statement that eligible students are packaged equitably and consistently within established need parameters. Include such information as:

- Packaging timing (e.g., before verification, after file review, etc.)
- Applicable gift aid and self-help packaging ratios
- Percentage of student need that is met and/or left unmet (i.e., gapping) during packaging
- Reservation of funds for late applicants or multiple start date programs
- Packaging sequence within each packaging category or group

Briefly explain the concept of need—that is, cost of attendance (COA) minus SAI equals financial need. Explain the treatment of other financial assistance (OFA) and the remaining need concept for the campus-based programs (i.e., need minus other OFA equals remaining need). Explain the calculation for non-need-based aid, e.g. Direct Unsubsidized Loans, Direct PLUS, and TEACH Grants, the OFA is subtracted from the COA (i.e. COA minus OFA equals remaining eligibility). State the school's treatment of OFA provided by a state and designated by the state to offset a specific COA component. Note that if such OFA is excluded from either OFA or COA, then the amount of that OFA must be excluded from both. You may want to cross-reference the student budgets section of the manual here.


NASFAA Monograph, *Developing the Cost of Attendance*, defines acceptable expenses and outlines consistent approaches for establishing reasonable levels for those expenses, while avoiding specific citation of figures, averages, or ranges. Additional information may be found under Publications, available from the Tools & Resources tab on the NASFAA website.

Resources:

GEN-16-05
GEN-06-05
HEA 480(j)
2025-26 FSA Handbook, Vol. 3, Ch. 2
2025-26 FSA Handbook, Vol. 3, Ch. 3

Response:

All students are packaged equitably and consistently within federal, state, CCC, and institutional need parameters.

- Packaging Timing: Students are initially packaged after the verification and file review are completed. The awards will be updated as needed.
- Gift Aid vs. Self-Help: Priority is given to grant and scholarship aid before loans and FWS.
- Unmet Need: MCCD attempts to meet as much need as possible; however, limited state and institutional funding mean some students may experience unmet need

Procedures

Describe how the financial aid office ensures its packaging policies are being followed. Provide information about who in the financial aid office is responsible for overseeing the packaging process. Also, describe how the financial aid office ensures all students are packaged equitably and consistently within any federal, state, and institutional guidelines. Indicate which aspects of packaging are manual and which aspects are automated. For automated systems, include a listing of all packaging codes used and a description of the financial aid offered with each. You may wish to cross-reference the packaging groups and package notification sections of the manual.

You may want to illustrate the packaging process from beginning to end using a flowchart. Alternatively, detailing the packaging process step-by-step might be used, as in the following example:

Step 1: The assistant director generates a preliminary report of all students for whom verification is complete and are ready for packaging

Step 2: The assistant director gives the packaging report to the packaging counselor

Step 3: The packaging counselor reviews the report to ensure the students selected were sorted into appropriate categories or groups

Step 4: After reviewing the report, the packaging counselor sets a flag to have the computer system run the final automated packaging program during its next scheduled run

Step 5: The packaging counselor reviews the resulting Funds Balance Report to ensure the amounts of funds offered to each student category follow policy guidelines

Step 6: After reviewing the Funds Balance Report, the director revises the packaging parameters to adjust the amounts of funds provided from each financial aid program to prevent overspending

Step 7: The packaging flag is reset and automated packaging rerun

Step 8: After reviewing the second Funds Balance Report, the director authorizes the financial aid offers to be finalized

Step 9: Student financial aid offers are sent

Response:

Packaging is primarily automated through the Ellucian Colleague system; but manual adjustments could be made for scholarships, FWS, and special exceptions. The Ellucian Colleague system is set up with the following stacking policy:

- Federal Pell Grant
- State Grants.
- Scholarships.
- FSEOG.
- FWS
- Federal Direct Subsidized Loans.
- Federal Direct Unsubsidized Loans.

9.6 Packaging Other Educational Resources



Best Practices for Avoiding Implicit Bias in Scholarship Programs

Implicit bias refers to the stereotypes, biases, and attitudes we unconsciously hold that influence our actions, understanding and decisions. They can be helpful in that they allow us to quickly make decisions, and in other situations, they can be unhelpful in that they allow us to unconsciously exclude, marginalize, or devalue others. We must therefore become aware of our unintentional applied biases and work towards more inclusivity. Schools should review, evaluate, and streamline their entire process of administering scholarship funds to identify areas and reduce the occurrence of implicit bias when offering scholarships.

• Financial aid offices should work collaboratively with the advancement office when onboarding new scholarships. This will help with the donor agreement and/or relationship.

• Scholarship applications should be considered to accommodate all demographics.

• Depending on the scholarship agreements, scholarship selections could vary across many departments. It is effective to have a liaison in the financial aid office to communicate across many departments.

Securing Funds

From the onset of raising funds, schools will want to maintain a donor-friendly culture while being strategic in knowing well, and communicating to donors, the needs of their student population. To this point, financial aid and advancement offices should work together when onboarding new scholarships. Schools should strategize about how best to help students in need while also casting a wide enough net to include and attract a diverse group of student applicants, accommodating all student demographics.

Donor agreements can then be written to be clear and concise, including donor criteria and with sufficient flexibility to allow for proper administration. For instance, if a donor wishes a scholarship to be provided to full-time students (e.g., 12-19 credits), it is important that another credit requirement does not then contradict this intent. In other words, the donor agreements should not then specify another number of credits (e.g., 15 credits) which can then create a contradiction in packaging strategy. Donor agreements should also include flexible disbursement timelines in support of students.

While donor agreements may specify the criteria that an applicant must meet in order to receive funds, it is important to consider restrictions and preferences that will invite scrutiny or legal challenge, such as scholarships that are limited to a particular race or gender.

Application Process

While scholarships may be administered directly or via scholarship management system, it is important that there is a system/mechanism in place to set a deadline, promote the application, manage submissions, offer scholarships, and produce reports useful to colleges, donors, and students.

Scholarship applications should be designed so that schools collect only pertinent information that help with better awarding decisions. Information that can be gathered/verified (e.g., GPA, degree, class) from a school's student information system can be pulled separately, thus providing ease of application completion.

Schools should be intentional in their communication, awareness, and targeted efforts to attract applicants (including at-risk students).

Scholarship Selection Process

Well-defined purposes of scholarships and selection criteria will ensure that applicants are judged on the same scale and students are not left without understanding how all is evaluated. When selecting scholars, it is best to remove personally identifiable information such as name, date of birth, postal code.

Schools may also wish to implement a scholarship rubric to give scholarship committee members and students clarity in the selection process.

Scholarship committee members, including alumni, should be provided with implicit bias awareness training. Also, depending on the scholarship agreements, scholarship selections could vary across

many departments. It is effective to have a liaison in the financial aid office to communicate across many departments.

Scholarship Reporting

Scholarship committees should articulate why specific students were selected as well as how their selection in a particular year furthers the purpose of the scholarship, therefore, demonstrating a school's commitment to student success. This is also an opportunity to connect scholars with their donors.

Applicant and recipient data can be used to track trends over time, better understand the applicant pool, and see how exactly scholarships funds were used and how students who received aid fared overall. Data review will allow student representation in scholarship decisions to be evident and/or reveal bias trends that should be reviewed and updated.

Be transparent about the scholarship office and all review committee policies.

Policies

Resources:

HEA 480(j)

Your packaging policies must address how outside or other educational resources are considered in the packaging process. The Higher Education Act of 1965 (HEA), as amended, and regulations provide specific guidance for packaging with certain forms of OFA. The HEA also lists sources of student aid other than Title IV funds in the definition of other OFA. Schools should establish policies for the treatment of each type of OFA in the packaging process.

You may wish to create subsections, including but not limited to those forms of OFA listed in subsections 9.6.1 to 9.6.6 that follow. In addition to any program-specific criteria, include a statement about how the financial aid office coordinates certain benefits (if necessary) and other OFA with Title IV funds. You may wish to cross-reference the administrative capability section of the manual here. Include information about how the financial aid office ensures the student's Title IV aid, in combination with OFA, does not exceed a student's need. You may wish to cross-reference the overawards and overpayments section of the manual.

Response:

The financial aid office works with the Merced College Foundation to coordinate the scholarship drive. The foundation office supports the donors and secures scholarship funding to be listed on the annual scholarship drive. The financial aid office oversees the annual scholarship drive and awards funding based on donor criteria for our students. The scholarship committee selects students to award, and the financial aid office is notified of the students selected and the amount to award. The foundation office handles the donor agreements and works with the fiscal office and the financial aid office on funding amounts that are listed every year.

Procedures

Explain how the financial aid office learns about other OFA (e.g., scholarships, state programs, etc.) before and after packaging Title IV aid. Detail internal communication procedures to ensure the financial aid office is notified of aid over which it has no control (e.g., direct posting to the student's financial aid record when merit scholarships are provided by academic departments, emails from the housing office when submitting tuition waivers for residence hall advisors, etc.). You may wish to cross-reference the administrative capability section of the manual. A flowchart might be used to illustrate communications among the various offices.

Response:

The scholarship drive is through an online platform. Students log in and answer questions to determine their eligibility. Some scholarships may also be based on the student's major. Once the scholarships are identified to be potentially eligible, the student can upload personal statements and letters of recommendation.

The financial aid office will award the scholarship awardees that have been selected and then will disburse funding if the student continues to meet all the donor criteria. After awarding and disbursement, the financial aid office and our foundation office will meet to reconcile the remaining donor funding.

9.6.1 Student Support Services Grants

Policies

Resources:

State your school's policy regarding the Student Support Services (SSS) Grant Program. Include

student eligibility criteria, such as SSS Grant recipients must also be eligible for Federal Pell Grants. Include information about documentation, forms, and correspondence used, as well as who is responsible for overseeing the program.

HEA 402D

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe how eligible students are identified. Detail internal communication and/or reporting procedures to ensure the financial aid office is notified of grants. Explain how SSS funds are packaged. Indicate the effect of SSS when students are packaged with Federal Work-Study (FWS) and/or loan funds.

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

9.6.2 Gaining Early Awareness and Readiness for Undergraduate Programs Funds

Policies

State your school's policies for offering Gaining Early Awareness and Readiness for Undergraduate Program (GEAR-UP) funds. Include information about eligibility criteria, documentation, forms and correspondence used, and who is responsible for overseeing the program.

Resources:

HEA 404E

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe how recipients are identified. Detail internal communication and/or reporting procedures to ensure the financial aid office is notified. Explain the effect of GEAR-UP funds when students have been packaged with Title IV aid.

Resources:

694.13
694.14

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

9.6.3 AmeriCorps Benefits

Policies

State your school's policy for coordinating Corporation for National and Community Service (AmeriCorps) education and post-service benefits. Specify how students may use AmeriCorps. Specify how AmeriCorps is included as OFA when determining eligibility for Direct Unsubsidized Loans. Specify how AmeriCorps is not considered OFA when determining eligibility for Direct Subsidized Loans. Explain in your policy whether or not for campus-based and TEACH Grant purposes, your school chooses to exclude as OFA a portion of any Direct Subsidized Loan that is equal to or less than the amount of the student's AmeriCorps benefit paid for the cost of attendance. Include information about documentation, forms and correspondence used, and communications between the school and the AmeriCorps program.

Resources:

673.5(c)(3)
685.102(b), Estimated financial assistance
2025-26 FSA Handbook, Vol. 3, Ch. 3

Response:

The Segal AmeriCorps Education Award is offered to individuals who complete a term of service and can be used to pay for a range of educational expenses, like repaying qualified student loans or future tuition payments. The AmeriCorps benefit will be considered a federal scholarship (not a waiver). It will follow non–need-based scholarship rules.

Procedures

Describe how eligible students are identified. Detail internal communication and/or reporting procedures to ensure the financial aid office is notified of AmeriCorps benefits received. Explain the repayment process if the benefit is designated to repay eligible student loans.

Resources:

45 CFR 2528.10

Response:

The financial aid office will be notified via email from epayments@americorps.gov. The email will indicate that a pending request has arrived and is awaiting action. The financial aid office will verify eligibility and for what term the funds are for and will certify the request. Once certified, the

fiscal office will notify the financial aid office when the funds are received via EFT. The financial aid office will then disburse the funds to the student's account.

The AmeriCorps Disbursement Rules are as follows:

- A FAFSA is not required.
- SAP is not required.
- Minimum enrollment: 1 unit

9.6.4 Vocational Rehabilitation Benefits

Policies

State your school's policy for packaging students who will receive vocational rehabilitation benefits. If your school has an agreement with the state agency specifying how vocational rehabilitation benefits will be coordinated with other forms of aid, indicate that here. Include information about documentation, forms and correspondence used, the offices responsible for coordinating with the local vocational rehabilitation office, and a contact person at that local office (if available).

Resources:

2025-26 FSA Handbook, Vol. 3, Ch. 3

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe how eligible disability-related costs are included in the student's COA. You may wish to cross-reference the COA section of your manual here. Outline your procedures for packaging and/or repackaging based on a student's vocational rehabilitation benefits. Explain how the school will monitor these applicants and notify the vocational rehabilitation office of any changes that would affect the student's financial aid package. Detail internal communication and/or reporting procedures to ensure the financial aid office is notified of vocational rehabilitation benefits received.

Resources:

GEN-06-19

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

9.6.5 Bureau of Indian Affairs Grants

Policies

State your school's packaging policy regarding Bureau of Indian Affairs (BIA) Grants. Include information about documentation, forms and correspondence used, the individual responsible for coordinating with the BIA, and the BIA contact (if available).

Resources:

673.6(b)
673.6(c)
2025-26 FSA Handbook, Vol. 3, Ch. 3

Response:

Bureau of Indian Affairs Native American Indian students may receive educational grants from the Federal Bureau of Indian Affairs (BIA).

Procedures

Describe how students are initially packaged and how packages are revised with BIA Grants to supplement the aid packages. Explain how overawards are eliminated by reducing other aid in the following sequence:

Resources:

673.6

1. Loans;
2. Work-study; and
3. Grants other than Federal Pell Grants.

Indicate the method by which students are notified of BIA funds, as well as how students are informed of any special conditions for retaining BIA Grants. Detail internal communication and/or reporting procedures to ensure the financial aid office is notified of BIA funds.

Response:

A student must be able to prove that he or she is a member of a federally recognized tribe. BIA requires applicants first to apply for a Federal Pell Grant. Applications for BIA grants for California Tribes are available by writing to the Bureau's Office, Office Indian Education, 2800 Cottage Way, Sacramento, CA 95825 or by calling 916.978.6000.

9.6.6 Health and Human Services Program Grants and Loans

Policies

State your school's packaging policies regarding U.S. Department of Health and Human Services (HHS) Program grants and loans (e.g., Scholarships for Disadvantaged Students, Nursing Student Loans, etc.). State how the school incorporates Title IV guidelines when packaging Title IV aid with Titles VII and VIII funds. Include information about documentation, forms and correspondence used, and the school coordinator responsible for overseeing the program.

Resources:

42 USC Chapter 6A, Subchapter V; Health Professions Education
HHS SFA Guidelines

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe how eligible students are identified. Detail internal communication and/or reporting procedures to ensure the financial aid office is notified of HHS program funds received. Indicate how funds are packaged with campus-based program funds. Indicate the treatment of these funds for non-Title IV recipients. Specify how aggregate loan amounts are monitored for the HHS student loan programs (i.e., Health Professions Student Loans, Nursing Student Loans, etc.).

Resources:

HHS SFA Guidelines

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

9.7 Employer-Provided Educational Assistance

Policies

State your school's policy on the treatment of employer-provided educational assistance provided to eligible students under section 127 of the Internal Revenue Code (IRC). Include information about documentation, forms and correspondence used, and the offices responsible for coordinating the program.

Resources:

IRS Pub 970, Tax Benefits for Education, Chapter 10

Response:

When a student's employer offers tuition reimbursement for their employees, either the student or the employer can reach out to the student fees office. Both the student and the employer will be directed to the Make a Payment website for additional information.

Procedures

Describe how students and their families are informed of how employer-provided educational assistance benefits are applied at your school. Indicate the method by which students are notified of these benefits and how they affect aid packages. Detail internal communication and/or reporting procedures to ensure the financial aid office is notified of benefits received.

Response:

There are two parts needed for the student fees office to allow for sponsor billing.

1. Students submit an authorization to release information form from Admissions.
2. Students submit an authorization to pay on their account for the employer.

9.8 Crossover Payment Periods/Summer Financial Assistance

Policies

If your school calendar consists of crossover periods (i.e., a payment period that crosses over July 1), describe your policies for offering funds for crossover periods for each of the Title IV programs and state your school's policies for making funds available for summer attendance. Also indicate whether you:

- Assign crossover periods to the prior year or the upcoming year for Federal Pell Grant
- Assign crossover periods to the prior year or the upcoming year for TEACH Grant
- Use campus-based funds for the crossover period from the prior year's allocation or the upcoming year's allocation
- Adjust the COA to reflect periods of other than nine months when offering TEACH Grant, campus based, or Federal Direct Student Loan (Direct Loan) funds for the crossover period

Resources:

690.64(a)(2)
GEN-22-15
Federal Register, 11/4/22, pp 66683 to 66684
2024-25 FSA Handbook, Vol. 6, Ch. 2, June 2024
2025-26 FSA Handbook, Vol. 3, Ch. 3
2025-26 FSA Handbook, Vol. 8, Ch. 6
2024-25 FSA Handbook, Vol. 9,

- Offer Federal Work-Study (FWS) for summer costs only to students who are enrolled during the summer, or offer FWS as a means of pre-earning their upcoming year's FWS, stating how earnings are attributed
- Use a scheduled academic year (SAY) or borrower-based academic year (BBAY) for Direct Loan purposes
- Treat summer as a leader or trailer for Direct Loan purposes for programs with certain structures

Explain changes in packaging associated with the FAFSA Simplification Act which eliminated any type of prorating for family financial strength reflected in the SAI, regardless of the number of payment periods attended, and whether you package summer separately, use a retroactive approach, or package only as part of the upcoming award year. Include a statement of the requirement to use the same award year SAI when offering campus-based and Direct Loan funds for the same crossover period.

Response:

MCCD does not utilize crossover payment periods for summer financial assistance. All federal, state, and institutional aid eligibility is determined according to the standard academic year, and the summer term is treated as a trailer to the academic year.

Financial aid eligibility for summer is based on the current award year FAFSA, COA, and SAI. MCCD does not split or assign crossover periods between award years. MCCD applies the same SAI for all programs within a single award year. No prorating of SAI occurs based on the number of payment periods attended.

Procedures

Explain how you:

- Identify and track summer aid applicants and recipients (e.g., an institutional form indicating intent to enroll during the summer)
- Determine the amount of aid available from each aid program for summer
- Reconcile summer aid amounts with the rest of each student's award year package to ensure program maximums are observed
- Ensure FWS earnings are paid from the appropriate award year's allocation or track any summer carry-back amounts
- Document each student's file with the student's intent to enroll during the subsequent term or payment period when offering FWS during periods of nonattendance
- Determine and record each student's eligibility for summer aid
- Notify recipients of their summer aid eligibility

Include information about documentation, forms, and correspondence used, cross-referencing these sections of the manual (if appropriate). You may also wish to cross-reference the packaging notification section of the manual.

Response:

Identification of Summer Applicants: Students are identified for summer aid consideration when they enroll in summer courses.

- All summer aid is processed as part of the trailing term of each academic year.
- Eligibility is based on the FAFSA and remaining annual or aggregate eligibility.
- Pell Grants are automatically awarded at full-time (12 units) enrollment, then adjusted based on actual units at census.
- MCCD does not offer FWS for summer.

Ch. 3, July 2024
2025-26 FSA Handbook, Vol. 7, Ch. 2
2025-26 FSA Handbook, Vol. 8, Ch. 3

9.9 Package Notification

Policies

Describe how students are notified of their student financial aid packages. Describe your school's

Resources:

notification and the type of information it includes. Cite the regulatory requirement that the notification includes any amounts the student can expect to receive from each Title IV program, as well as disbursement amounts and disbursement dates for each aid type. Indicate that subsidized and unsubsidized Direct Loan amounts are listed separately if the aid offer includes these funds. Explain the student's responsibilities (if any) upon receipt of the notification and the ramifications of his or her failure to respond. If the notification is used to satisfy other Title IV program consumer information requirements, identify them here and cross-reference the consumer information section of your manual, if appropriate.

668.165(a)
2025-26 FSA Handbook, Vol. 3, Ch. 3
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024

 As a good practice, the notification should:

- Provide COA information, breaking down both direct and indirect costs
- Explain the SAI
- Provide the student's total need and remaining need after gift aid
- Indicate total amounts of gift aid and self-help aid offered
- Indicate the enrollment periods, terms, or payment periods in relation to offers and disbursements to pay educationally-related student costs
- Detail the amounts and types of aid offered and any conditions linked to eligibility for each aid type
- Specify the assumptions used to offer aid (e.g., enrollment and anticipated living status)
- Outline what must be done to accept or decline any part of the offered aid, including the need to complete and return specific materials (e.g., signed copy of the paper notification and/or loan promissory note)
- Indicate any response dates for all materials and acceptable method(s) of response (e.g., secured website, email, phone call, signed and returned letter, etc.)
- Include financial aid office email and/or standard mail addresses, phone and fax numbers, and staff contact names and titles
- Provide links to consumer information, National Student Loan Data System (NSLDS), and a glossary of standard financial aid terms
- Disclose student financial aid rights and responsibilities, including appeal, revision, and renewal policies, as well as standards students must meet to continue to receive aid

 NASFAA's Award Letter and Consumer Information Task Force published a report to provide financial aid offer best practices along with a glossary of standardized terms. The task force's report may be found within Improving Financial Aid Offers under the Advocacy, Policy & Research tab on the NASFAA website.

Response:

Both prospective and continuing students are notified by email to their student email account of their eligibility for federal, state, institutional, and private aid programs. Students are directed to access their Student Forms account to see if additional documentation is needed. Students can also access their Student Forms portal to see their financial aid offer and to view their satisfactory academic progress (SAP) status.

In accordance with 34 CFR § 668.165(a), each financial aid offer includes the amounts of aid the student can expect to receive from each Title IV program, disbursement amounts, and a clear distinction between Direct Subsidized Loans and Direct Unsubsidized Loans, if both are offered.

Notification Content: Each aid notification includes the following elements:

- Cost of Attendance (COA): A breakdown of direct (tuition, fees, etc.) and indirect (books, transportation, personal) costs.
- Student Aid Index (SAI): Explanation of the figure and its role in determining eligibility.
- Financial Need Summary: Total need, gift aid offered, and remaining need after grants and scholarships.

- Financial Aid Summary:
  - Total amounts of gift aid and self-help aid (loans/work-study).
  - Separation of Title IV funds by type (Pell Grant, FSEOG, Direct Subsidized Loan, Direct Unsubsidized Lan)/
- Eligibility Conditions: Enrollment level, living arrangements, and other assumptions used in the offer.
- Acceptance Instructions: Steps to accept or decline all or part of the aid offered.
- Response Deadlines and Methods: Specific due dates and accepted methods (secure website, email, phone, or signed letter).
- Contact Information: Financial aid office email, mailing address, phone, fax, and staff contact names/titles.
- Consumer Information:
  - Link to MCCD student rights and responsibilities.
  - National Student Loan Data System (NSLDS).
  - Glossary of financial aid terms.

Student Responsibilities:

Students must review their financial aid offer promptly and follow the instructions to accept or decline any portion of their aid. This process is done via their student portal in Student Forms. Failure to respond by the stated deadline may result in cancellation or delay of awards. Students are responsible for completing all required documents (e.g., master promissory note and entrance counseling) before disbursement.

Procedures

Describe how and when notifications are sent to students (e.g., the notifications are generated electronically and emailed to students, paper letters are sent via postal service, etc.). Outline procedures followed when students accept or decline aid offers, if required per the notification. Include information about following up on any returned notifications. Describe the procedures followed when a student does not respond to the notification, if that is required (e.g., automatic reminders via email, phone calls, paper notices).

Resources:

2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024
2024-25 FSA Handbook, Vol. 2, Ch. 7, August 2024

Response:

At the end of the import process, the financial aid office will send notifications to students to review their status. When a student is awarded and will be disbursed, the financial aid office sends another notification informing the student what the estimated disbursement date is.

Once funds are awarded and disbursed, the student fees office sends a refund file to BankMobile and students are notified to choose a preference for their refund.

9.9.1 Packaging Appeals

Policies

Provide the school's policies on aid adjustments based on appeals made by students (e.g., unusual circumstances that may warrant a dependency override, special circumstances, such as the loss of parental income, etc.). Indicate who is responsible for reviewing appeals. If this is done by a committee, list the committee make-up and define its role in the appeal process. Explain how a student is informed of the appeal process. Include information about required documentation (if any) and indicate time frames for submitting appeals and for school responses. Give examples of legitimate reasons for approving aid revisions as well as reasons for denying revision requests. You may want to cross-reference the professional judgment (PJ) section of the manual here.

Resources:

GEN-11-15
2025-26 FSA Handbook, Vol. AVG, Ch. 5
GEN-22-15

 NASFAA Monograph, *Professional Judgment in Eligibility Determination and Need Analysis*, identifies a variety of situations in which it may be appropriate to use PJ in need analysis and explores ways financial aid administrators may develop good practices and consistent treatment of aid applicants at their individual institutions. Monographs are available online within Publications

under the Tools & Resources tab on the NASFAA website.

Response:

See Section 10: Professional Judgments

Procedures

Describe the appeal process and include the following:

- How a student requests a review of their aid package by appealing
- How student appeals are routed within the financial aid office
- How the student is notified of the appeal outcome

If appeal forms are involved, you may wish to cross-reference the forms and correspondence, and the document collection and tracking sections of the manual.

Response:

See Section 10: Professional Judgments

9.9.2 Aid Package Revisions

Policies

Give examples of conditions that might trigger an aid package revision (e.g., change in enrollment intensity prior to a Federal Pell Grant census date). You may want to include your policies on Federal Pell Grant and other recalculations here, or you may wish to cross-reference the aid programs section of your manual. Describe any policies regarding which funds are revised (e.g., students are given a choice of loans or work-study, etc.). Include information about the responsible person for overseeing the revision process. You might want to cross-reference the packaging, other educational resources, overawards and overpayments, professional judgment, verification, and/or application postscreening sections of the manual.

Resources:

2025-26 FSA Handbook, Vol. 7, Ch. 3
690.80

Response:

MCCD reviews student financial aid eligibility continuously throughout the award year to ensure compliance with federal, state, and institutional regulations. A student's aid package may be revised at any time if new information is received that affects eligibility or award amounts.

Revisions may occur due to automated system processes, staff-initiated actions, or regulatory data updates. The financial aid office utilizes Ellucian Colleague to manage, document, and notify students of all aid adjustments.

Examples of conditions that may result in a financial aid package revision include:

- Receipt of a subsequent Institutional Student Information Record (ISIR) with corrected or updated FAFSA data.
- Change in COA due to adjustments in housing, tuition, or program costs.
- Change in enrollment status or intensity, such as dropping below full-time.
- NSLDS post-screening results show new or updated Title IV loan or grant information.
- Identification of conflicting information requiring resolution.
- Professional judgment or special circumstance appeals resulting in an updated SAI or adjusted budget.
- Transfer monitoring results or overlapping financial aid periods from other institutions.
- Potential Overpayment (POP) for Pell grant or concurrent enrollment notifications.
- C-flags or comment codes requiring further review or documentation.

Revisions may affect one or more aid programs, depending on the change. Adjustments are made to ensure compliance with federal and state need analysis and over award rules.

- Pell Grant and other Title IV aid are recalculated when enrollment changes occur before the Pell census date.

- Institutional and state grants are adjusted in alignment with current enrollment and eligibility rules.
- Federal Direct Loans and FWS may be reduced, canceled, or replaced depending on student choice and remaining need.

The FACs are responsible for initiating, reviewing, and approving revisions in CampusLogic/Student Forms. The DFA or designated FAC oversees the accuracy and compliance of all aid adjustments. System-generated revisions (e.g., triggered by ISIR corrections or post-screening) are also monitored.

Procedures

Describe how, and the time frame within which, revisions are made (e.g., a staff member manually changes the offer in the computer system, or the system automatically revises aid when a flag is set on the student's record). Include an explanation of how students are notified of any revisions. Indicate who is responsible for overseeing this process. You may wish to cross-reference the package notification section of the manual.

Response:

Every import of new ISIR information, the FAC will review the subsequent ISIRS for changes and potential verification conflicts. The FAC may flag a student's financial aid record for additional information and place the award on hold until verification is complete.

9.10 Overawards and Overpayments

Policies

Overawards and overpayments can occur for a variety of reasons including receipt of internal or external forms of OFA and institutional error. The financial aid office must have adequate internal controls in place to ensure a student does not receive more Title IV aid than the amount for which the student is eligible. Include definitions of an overaward and an overpayment when describing your policies for preventing and identifying them.

Provide information about overawards and overpayments caused by institutional error and describe the school's liability. Also address overawards and overpayments for which the student is liable. Your policies should include examples of circumstances that cause overawards and overpayments, as well as your policies regarding the treatment and resolution of each. You may wish to cross-reference the packaging other educational resources section of the manual here.

Resources:

673.5(a)
685.301(a)(4)
686.21(c)
2024-25 FSA Handbook, Vol. 4, Ch. 3, April 2024
686.21(d)

Response:

If a student is determined to be an overaward due to either staff error or new conflicting information, the award will be on hold until the error or conflicting information is corrected. If the financial aid office determines that the error or conflicting information cannot be corrected, the financial aid office will work with the fiscal office to adjust the award, return Title IV funds, if needed, and create a student's debt, if required.

Procedures

Describe all measures taken to prevent overawards and overpayments, including how the financial aid office monitors student records to identify them (e.g., a weekly overaward report is generated based on scholarships posted to students' accounts by the bursar's office). List steps involved and interoffice communications regarding funds offered to or received by students.

Describe how the financial aid office determines if an overaward or overpayment is due to an institutional error for which the school is liable or if an overaward is the student's responsibility. Detail how you resolve overawards and overpayments when they are the student's liability and when they are the school's liability. Include a statement that Federal Pell Grant awards are never reduced to resolve overawards of campus-based aid, TEACH Grant funds, or overpayments of Direct Loan funds.

Resources:

673.5(f)
686.34
690.79
2024-25 FSA Handbook, Vol. 4, Ch. 3, April 2024

Response:

If a student is determined to be an overaward due to either staff error or new conflicting information, the award will be on hold until the error or conflicting information is corrected. If the financial aid office determines that the error or conflicting information cannot be corrected, the financial aid office will work with the fiscal office to adjust the award, return Title IV funds, if needed, and create a student's debt, if required.

9.10.1 Resolving an Overaward or Overpayment When Student is Liable

Policies

Provide examples of circumstances that cause overawards or overpayments for which the student is responsible. For example, in a situation where a student does not report receipt of an external scholarship to the financial aid office, but the business office reports receipt of those funds to the financial aid office, a potential overaward for which the student is liable is discovered and must be resolved. Address allowable options for resolving overawards and overpayments under your policies, including:

- Increasing the student's budget (if warranted)
- Adjusting the value of the data elements used to calculate the student's SAI (if warranted)
- Invoking the $300 tolerance for campus-based aid
- Reducing or canceling aid
- Terminating the student's FWS employment
- Returning undelivered loan proceeds

Describe your policy when an overaward or overpayment cannot be eliminated by one of the aforementioned options. Include details such as:

- The school's attempts to collect any overaward or overpayment amounts, such as requesting that the student return FSEOG funds to the school
- Reporting the overpayment status to NSLDS
- The school's repayment of funds to the Title IV program account on the student's behalf, turning the overaward into an institutional debt
- Referral of any Federal Pell Grant, TEACH Grant, or FSEOG overpayments to the U.S. Department of Education (ED) Collections

Response:

If the overaward is due to a student being liable, the financial aid office will adjust awards, which could create a debt on the student's account.

Resources:

673.5(e)
2024-25 FSA Handbook, Vol. 4, Ch. 3, April 2024
673.5(f)
673.5(d)
686.34(b)
686.34(c)
690.79(b)
690.79(c)

Procedures

Describe the action(s) taken to resolve overawards or overpayments when the student is liable. An *If/Then Decision Table* is one way to illustrate this procedure.

For example, the student is eligible for a Direct Subsidized Loan. After the loan is originated for an amount that fully covers his or her need, the student receives an external scholarship for $1,000. Now the student is overawarded by $1,000.

Possible action:

Step 1

If … the school has not received any of the loan funds

Step 2

Then … it will cancel the original loan and reprocess a second loan for a lesser amount

OR

Possible action

If … the school determines the student has additional educational expenses, the student's budget will be increased

Then … the school will reassess to see if an overaward still exists

OR

Possible action

If … the student has received the first disbursement

Resources:

673.5(f)(3)
673.5(f)(4)
686.34(b)
686.34(c)
690.79(b)
2024-25 FSA Handbook, Vol. 4, Ch. 3, April 2024
690.79(c)

But ... the school has not received the second disbursement

Then … the school will cancel the second disbursement

OR

Possible action

If … the student has received both disbursements

Then … no action will be taken

Describe how the financial aid office notifies the student of the actions taken when an overaward or overpayment is identified and resolved. Include information about how the school responds to student objections.

Describe the steps taken to notify a student in writing that the student owes a Title IV overaward or overpayment if the financial aid office is unable to eliminate the overaward or overpayment. Include details about how the school attempts to collect the overaward or overpayment. Describe the steps taken when reporting overpayments to NSLDS. You may want to cross-reference the reporting and reconciliation section of the manual.

Response:

The student fees office sends notifications to students that due to an overaward, there is a debt on the account that needs to be paid.

9.10.2 Resolving an Overaward or Overpayment When School is Liable

Policies

Describe the action(s) taken to resolve overawards and overpayments when the school is liable. State that students are not liable for Federal Pell Grant, TEACH Grant, or FSEOG overawards or overpayments caused by school error and that such overawards or overpayments cannot be corrected by reducing subsequent disbursements. Your policy should also state that an overaward or overpayment for which the school is liable cannot be considered a student overpayment or reported to NSLDS, nor is the overpayment amount considered OFA or financial aid when packaging. Your policy should also address the resolution of an overaward or overpayment that is the school's liability, including:

- Immediate restoration to the program account by the school of Federal Pell Grant, TEACH Grant, or FSEOG funds incorrectly provided but previously disbursed
- Immediate correction of pending Federal Pell Grant, TEACH Grant, or FSEOG amounts and disbursements
- The school's policies for collecting the debt subsequently owed to the institution

Resources:

686.34(a)(2)
673.5(f)(2)
690.79(a)(2)
2024-25 FSA Handbook, Vol. 4, Ch. 3, April 2024

Response:

Students may become overawarded when their total financial aid exceeds their calculated financial need or COA. Overawards typically occur when a student who was initially eligible for specific aid becomes ineligible due to a change in COA, enrollment status, receipt of a subsequent ISIR, conflicting information, outside scholarships, or other eligibility updates.

If the liability is on the school, the financial aid office will act appropriately to reduce, return, or cancel any funds that have been awarded. The financial aid office will notify the fiscal office of any liability, and the fiscal office will return funds through the appropriate federal and state processes.

Allowable Overaward: There are instances where overawards are allowed and are not required to be cleared. For example, when a student was eligible for their loan at the time of disbursement and later became ineligible due to a change in enrollment.

Overpayment: An overpayment occurs when a student receives more Title IV aid than they are eligible to receive after funds have been disbursed. Overpayments are typically identified through a student-actionable C-flag on the ISIR or through alerts such as the COD POP report.

Procedures

Describe the action(s) taken to restore incorrectly disbursed Federal Pell Grant, TEACH Grant, and FSEOG funds to the appropriate Title IV account. Also describe the procedures for adjusting the student's aid package to reflect the correct amounts. You may wish to cross-reference the packaging

Resources:

673.5(f)
686.34

and the package notification sections of the manual.

690.79
668.21
2024-25 FSA Handbook, Vol. 4, Ch. 3, April 2024

Describe and explain how disbursed and undisbursed Federal Pell Grant, TEACH Grant, FSEOG, and Direct Loan funds are returned to the Title IV program if the student never begins attendance in the classes for which the aid was provided. Describe the steps taken to collect and return funds that were already disbursed directly to the student.

Also detail the procedures for notifying the student of his or her institutional debt and of the procedures the student is to follow for repaying that debt. Include deadlines. You should also indicate the procedures the student should follow, and the actions taken when the student objects to the school's attempts to collect an institutional debt.

Response:

For an overaward, a debt letter will be sent to the student from the financial aid office with directions on repaying the debt through the student fees office.

When an overpayment indicator is present, a task is automatically generated for the student in Student Forms. The student is prompted to submit the required documentation or take the specified action to resolve the issue. Once the student's documentation is received, a FAC reviews the information and completes the resolution process.

The following Title IV programs may generate an overpayment status:

- Federal Pell Grant.
- Federal Supplemental Educational Opportunity Grant (FSEOG).
- TEACH Grant.
- Iraq and Afghanistan Service Grant.
- Federal Direct Loans.
- Federal Perkins Loans.

Please Note: MCCD does not participate in the Federal Perkins Loan program or the TEACH Grant program.

For Pell Grant and FSEOG overpayments, students can clear the overpayment by establishing a repayment agreement with the U.S. Department of Education (ED). The FACs are encouraged to contact ED's Default Resolution Group (DRG) to confirm repayment arrangements and document the resolution in NSLDS for students who have a C-flag indicating an overpayment for these programs.

For Direct Loan overpayments, students must either reaffirm, consolidate, or fully repay the excess amount. The FAC will verify the completion of reaffirmation or consolidation by reviewing NSLDS and documenting the resolution..

Students with a C-flag indicating loan default are required to make satisfactory repayment arrangements with their loan servicer and complete six consecutive, on-time monthly payments before regaining Title IV eligibility. FACs confirm successful completion by reviewing NSLDS and documenting the resolution.

9.X - Reserved for Institutional Use

This section is reserved for any institution-specific area of policies and procedures not covered in previous sections. It may be necessary to include several sub-sections of institution-specific content within this area. If there is no institutional content, simply leave the area blank, or mark the box Complete as preferred.

Section 10: Professional Judgment (PJ)

10.1 PJ Authority and Individuals Who May Exercise It

The Higher Education Act of 1965 (HEA), as amended provides the authority for the financial aid administrator to exercise discretion in a number of areas when a student has special or unusual circumstances. This authority is known as professional judgment (PJ). It allows the financial aid administrator to treat a student individually when conditions exist that differentiate that student from a class of students. PJ decisions must be made on a case-by-case basis as the result of examining and documenting an individual student's unique circumstances.

Resources:

HEA 479A
2025-26 FSA Handbook, Vol. AVG, Ch. 5
GEN-22-15



Schools may not have a policy of refusing to consider PJ requests.



Best Practices for Avoiding Implicit Bias

While implicit bias cannot be completely removed from those who make decisions, implicit bias can be effectively identified and purged from institutional policies and procedures with sufficient understanding, diversity, cooperation, transparency, and accountability. Given this, financial aid offices should:

1. Ensure that policymakers and appeal adjudicators have completed thorough training in the areas of implicit biases. These individuals should understand what implicit biases are, how to identify them, and how to cooperatively mitigate their effect on students and families.

2. Where possible, aim for the policy and appeal decisions to be made by highly diverse committees composed of multiple professionals both within and outside of the financial aid office. These committees should consider including diversity officers, faculty, and staff to create a well-rounded cooperative that is poised to identify and mitigate implicit biases.

3. Ensure your institution's required documentation and how your office adjusts for specific situations are well documented in your policies and procedures to ensure consistency across all student populations.

4. Identify and maintain demographic data related to their appeal populations and be ready to present this data for regular review by diversity personnel. These reviews should seek to identify areas where policies or procedures may be improved and/or examine ways to create greater equity among negatively affected populations.

5. Consider removing unnecessary personal identifiers or bias-prone contexts from files before being reviewed by committees.

6. Ensure all appeal procedures and forms are ADA accessible.

7. Identify and target marginalized populations to ensure they are aware of the beneficial appeal options available to them.

8. Recommend training for the professional judgment process and incorporate quarterly audits to ensure consistent decisions within similar scenarios.

Policies

List financial aid office staff with the authority to exercise PJ. If a committee handles all PJ requests of a given nature, define its role and membership. If your school only utilizes a committee to review the financial aid office's decision upon further appeal by the student, describe that committee as well. Indicate that the financial aid administrator's decision is final and cannot be appealed to the U.S. Department of Education (ED).

Resources:

668.53(c)
2025-26 FSA Handbook, Vol. AVG, Ch. 5

Provide information about when PJ will be exercised (e.g., before packaging, after conflicting or inconsistent information has been resolved, etc.). You may want to cross-reference the file review and conflicting and inaccurate information sections of the manual. Note that if a student has been selected for verification (by either ED or the school), you must complete verification before exercising PJ.

 However, schools are not required to verify information which will be removed using PJ.

Schools also have the option of completing verification and professional judgement on the same Institutional Student Information Record (ISIR) transaction. You might want to cross reference the verification section of the manual.

Response:

The Merced Community College District (MCCD) exercises the authority the Higher Education Act (HEA) provides to consider special or unusual circumstances that cannot be considered on the Free Application for Federal Student Aid (FAFSA) or California Dream Act Application (CADAA) when determining a family's ability to pay for educational expenses. Professional judgment (PJ) discretion is granted explicitly in statute and may only be exercised on a case-by-case basis. MCCD has provided a guideline framework to use PJ when modifying data to calculate the student aid index (SAI), performing dependency overrides, resolving conflicting information, changes to the standard budget, reporting fraud cases, and determining a student to be an unaccompanied homeless youth. Once a PJ decision is made, it cannot be appealed to higher administration within MCCD or to the Department of Education (ED).

MCCD financial aid counselors (FACs) can exercise discretion in certain areas when a student's family has a special or unusual circumstance that is not adequately addressed by need analysis, regulations, or legislation. ED does not regulate PJ. The HEA explicitly authorizes MCCD to exercise PJ in the following areas:

- Dependency status (dependent to independent only):
- Certain data elements used to calculate the SAI.
- Cost of attendance (COA).
- 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 FAFSA:
- Denial or reduction of Federal Direct Student Loan eligibility.

The FACs at MCCD have the authority to exercise PJ in cases where a student's family faces special or unusual circumstances that are not adequately addressed by the standard need analysis, regulations, or legislation. ED does not regulate the exercise of PJ. The decisions made by the FAC are final and cannot be appealed to ED.

The financial aid office will review all requests for a PJ. If the SAI is already -1,500 to zero, it would not be necessary to burden the student and/or family with the completion of additional forms and documentation since they will already be receiving the maximum amount of awards they would be eligible for.

Procedures

Describe the PJ process step by step. Include information such as how the individual or committee evaluating PJ requests is informed when the student's request for consideration and applicable supporting documentation are ready for review.

Response:

PJ can be applied either before or after the financial aid packaging process, making sure that any conflicting or inconsistent information is addressed. It is important to understand that if either ED or the school has selected a student for verification, the verification process must be completed before PJ is applied. However, MCCD is not required to verify information that will be adjusted using PJ. Schools may also conduct verification and apply PJ simultaneously on the same Institutional Student Information Record (ISIR) transaction. All changes must be made via the FAFSA Processing System (FPS), The California Student Aid Commission (CSAC) WebGrants, and the CampusLogic Student Forms account.

10.2 Circumstances for Which PJ Adjustments are Allowed and Resulting Actions Taken

The financial aid administrator can exercise discretion in certain areas when a student's family has a special circumstance, e.g., unique financial situations such as the loss of a job or an unusual

Resources:

circumstance, such as an adjustment to dependency status, that is not adequately addressed by need analysis, regulations, or legislation. ED does not regulate PJ. **Schools must disclose publicly that students may request an adjustment based on special or unusual circumstances.** 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 student aid index (SAI)
- Cost of attendance (COA)
- Direct Unsubsidized Loan eligibility for dependent students whose parents have ceased supporting the student financially, will not support the student in the future, **or** refuse to complete the Free Application for Federal Student Aid (FAFSA®)
- Denial or reduction of Federal Direct Student Loan (Direct Loan) eligibility

 NASFAA Monograph, *Professional Judgment in Eligibility Determination and Need Analysis*, identifies a variety of situations in which it may be appropriate to use PJ in need analysis and explores ways financial aid administrators may develop good practices and consistent treatment of aid applicants at their individual institutions. Monographs are available under Publications from the Tools & Resources tab.

 NASFAA Monograph, *Developing the Cost of Attendance*, defines acceptable expenses and outlines consistent approaches for establishing reasonable levels for those expenses, while avoiding specific citation of figures, averages, or ranges. Monographs are available under Publications from the Tools & Resources tab.

Policies

Describe special and/or unusual circumstances that might trigger the use of PJ at your institution and the situations for which adjustments are allowed. Include examples such as:

- Elementary or secondary tuition paid by the family (adjust either SAI data element or COA component)
- Unusually high medical or dental expenses not covered by insurance nor accounted for in the Income Protection Allowance (IPA) calculation in the need analysis formula, if the school's policy is to use the IPA when making such adjustments (adjust SAI data element or COA component)
- Unusually high childcare or dependent care expenses (adjust either SAI data element or COA component)
- Unemployment of a dependent student's parent or an independent student or student's spouse (adjust SAI data element or COA component)
- Cases where a student or a student's family member is a dislocated worker (adjust SAI data element or COA component)
- Parents enrolled at least half time in a degree, certificate, or other program leading to a recognized educational credential at an eligible institution (adjust SAI data element)
- Natural disasters impacting a family's income or assets (adjust SAI data element)
- Conversions of traditional individual retirement accounts (IRAs) to Roth IRAs (adjust SAI data element)
- Abusive family relationships (adjust dependency status)
- Changes in a student's housing status resulting in homelessness (adjust dependency status, SAI data element, or COA component)
- Indication that the student does not intend to repay a student loan(reduce or deny loan amount requested)

Describe the guidelines used when adjusting a student's financial aid offer if the PJ outcome increases their eligibility (e.g., the school might have a policy to provide institutional grant funds

GEN-08-12
HEA 479A
GEN-15-06
GEN-11-15
HEA 480(d)(1)(I)
GEN-22-15
GEN-16-03
GEN-03-07
GEN-21-02
Electronic Announcement, 9/30/21 (APP-21-18)
HEA 479A(c)
HEA 480(d)(2)
GEN-08-01
685.301(a)(8)

before increasing a loan in some circumstances, or to offer loan funds before grant funds in others). You may wish to cross-reference the packaging revisions section of the manual here.

Describe circumstances for which PJ restrictions apply. Include examples such as:

- An independent student cannot be made dependent
- Changes cannot be made to the Federal Methodology need analysis formula
- Bottom-line SAI adjustments cannot be made
- No new cost components may be added to the COA
- Costs incurred after students are no longer enrolled (e.g., graduate school admissions tests) cannot be added to the COA

Response:

The FAFSA Simplification Act amends section 479A of the HEA to distinguish between different categories of professional judgment: The following PJ adjustments may be processed by the FAC. This is not an exhaustive list as PJ deals with unique circumstances.

Special Circumstances refer to the financial situations that justify an aid administrator adjusting data elements in the COA or the data elements that affect the SAI calculation.

Income Adjustment: If a student, their spouse, or a contributor to a dependent student's income experiences a significant drop in income for the current year compared to the base year, and this change does not accurately reflect their financial situation, the student may request an appeal.

- Loss of employment/income (laid off, reduction of hours).
- Other loss of income (alimony, child support, retirement/pension, social security (taxed), workers' compensation, or military discharge benefits) that have ceased or have been reduced.
- Legal separation or divorce occurred after filing the FAFSA or the CADAA.
- Death of a parent or spouse where the death occurred after filing the FAFSA or the CADAA.
- One-time non-recurring lump sum payment received.
- Out of pocket medical or extraordinary expenses were paid.

PJ During a Disaster, Emergency or Economic Downturn: The FAFSA Simplification Act, enacted into law as part of the Consolidated Appropriations Act, 2021, and amended by the Consolidated Appropriations Act, 2022, codifies previous guidance from ED (as issued in earlier Dear Colleague Letters) to use statutory authority to exercise professional judgment during a disaster, emergency, or economic downturn.

FACs may, during a qualifying emergency:

- Determine that the income earned from work for an applicant is zero if the applicant can provide paper or electronic documentation of receipt of unemployment benefits or confirmation that an application for unemployment benefits was submitted; and
- Make additional appropriate adjustments to the income earned from work for a student, parent, or spouse, as applicable, based on the totality of the family's situation, including consideration of unemployment benefits.

Cost of Attendance (COA): MCCD FACs can use PJ to adjust a student's COA if they demonstrate significant financial hardship or unique situations not reflected on the FAFSA or the CADAA, potentially including factors like unusual medical expenses, dependent care costs, and number in college. COA PJs could also include the purchase of a computer, additional books or supplies needed for a program of study, or additional travel expenses.

Unusual Circumstances refer to the conditions that justify an aid administrator adjusting a student's dependency status based on a unique situation (e.g., human trafficking, refugee or asylee status, parental abuse or abandonment, incarceration), more commonly referred to as a dependency override.

A FAC may consider dependency overrides (dependent to independent only) on a case-by-case basis for students with unusual circumstances. Unusual circumstances include students who no longer have any relationship with their parents for reasons such as severe estrangement from parents, abandonment by parents, an abusive family environment that threatens the student's health or safety, or the student being unable to locate their parents. If a student is in any of the mentioned circumstances, the student may meet with a FAC before starting the process. A parent's refusal to contribute to the student's education or their unwillingness to provide FAFSA or verification information, or the parent's assertion that they do not claim the student for income tax purposes and the student demonstrates self-sufficiency does not qualify as unusual circumstances for a dependency override.

Provisionally Independent: Both first time and renewal applicants who indicate on their FAFSA form that they have an unusual circumstance will be granted provisional independent status. They will be able to complete the form without providing parental information. They will also receive an estimate of their federal student aid eligibility, which will be subject to a final determination by MCCD. If MCCD approves their unusual circumstances, their independent status will carry over when they renew their FAFSA form in future award years, and they will be considered independent for as long as they remain at MCCD and their circumstances remain unchanged.

A student may have both a special circumstance and an unusual circumstance. FACs may appropriately adjust each student's situation with appropriate documentation. See GEN-22-15 for additional guidance and discussion of the changes made by the FAFSA Simplification Act.

Originating Direct Loans: Under certain conditions, the HEA gives financial aid administrators the authority to deny a Direct Loan or reduce the amount of a Direct Loan for which the borrower is eligible.

Direct Unsubsidized Loan Only: A FAC may exercise PJ authority to award only a Direct Unsubsidized Loan to a dependent student if the student's parents refuse to file the FAFSA or have ended financial support of the student.

Please Note: If the dependent student's parents refuse to complete the FAFSA, the student must complete the student portion of the FAFSA only. When the FAFSA asks the student to provide parental information, the student should indicate on the FAFSA that their parents are unwilling to provide their information. The student will also need to answer yes to the question indicating they want to apply for Direct Unsubsidized Loans only.

Once this is done, the dependent student will receive a rejected FAFSA Submission Summary, and the school will receive a rejected SIR with a comment code 049. The student will need to self-identify and follow up with the FAS office to continue the process of determining if they are eligible for just the Unsubsidized Direct Loan.

- The parents must then sign a statement indicating that they: refuse to fill out the FAFSA on the student's behalf; or
- Do not provide any financial support to the student, indicating the date the support ended and will not provide any financial support to the student in the future.

If the parents refuse to sign and date a statement to this effect, the FAC must get documentation from a third party (the student himself is not sufficient), such as a teacher, counselor, cleric, or court.

Dependency Override Alternative: As an alternative to the above, the FAC could also choose to use PJ to perform a dependency override to make the student independent if the FAC feels the student's circumstances are unusual and warrant such consideration.

Limiting Student or Parent Borrowing: Under certain conditions, the HEA gives financial aid administrators the authority to deny a Direct Loan or reduce the amount of Direct Loan for which the borrower is eligible. When denying or reducing Direct Loan or Direct PLUS eligibility, the statute and regulations require the financial aid administrator to:

The FAC must make the determination on a case-by-case basis. The FAC must document the student's file and notify the student or parent borrower, in writing, of the reasons for his or her PJ

decision and any actions taken. The FAC must not discriminate against any borrower or applicant in obtaining a loan based on race, national origin, religion, sex, marital status, age, disability status, or income.

If a borrower indicates they are unwilling to repay student loans, you may:

- Document the conversation with the borrower and include it in her file;
- Obtain a signed statement from the borrower indicating an unwillingness to repay; or
- Obtain other documentation that shows a previous history of unwillingness to repay student loans.

Procedures

Describe how each student or parent need analysis data element is adjusted. Include information such as:

- Who is responsible for adjusting need analysis data elements
- A description of the adjustment process (e.g., how staff calculates the value of revised data elements; a financial aid counselor enters all PJ data element adjustments and sets an FAA Adjustment flag; an electronic batch process then automatically recalculates SAIs for all flagged records and generates a report reflecting the recalculation results; finally, a counselor uses the report to adjust financial aid packages based on the new SAIs)
- The procedures for returning (ISIRs) or FAFSA Submission Summaries to the FAFSA Processing System (FPS) for reprocessing and/or the procedures for adjusting and transmitting the data electronically using ED's FAFSA Partner Portal (FPP) or Electronic Data Exchange application processing software (EDExpress).

Also describe how each student COA component is adjusted. Include information on who is responsible for making such adjustments.

You may want to illustrate the PJ adjustment process from beginning to end using a flowchart. Alternatively, detailing the adjustment process step by step might be used.

Response:

For income adjustments, the FAC may use projected-year income for any 12-month period that more accurately addresses the family's financial circumstances.

For example, if the circumstances occurred in 2024, the FAC can use the 2024 tax return for the appeal. However, if the circumstances occurred in 2025 or 2026, the FAC would need to project the income for that year by gathering the appropriate documentation. Note that if the income from either 2024, 2025, or 2026 more accurately reflects the family's situation, the school may use either year's income as the projected income for the 2025-26 award year.

It is essential to document the determination in the student's file and indicate that PJ was used when submitting adjustments to the ISIR in the FPS. If the circumstances extend from one year to the next, MCCD can reuse the same documentation, if it supports the continued application of PJ based on the same projected year income. The projected calendar year income (January to December) is typically used to calculate the projected year income.

Students or parents whose primary source of income comes from self-employment cannot appeal for projected year income if the business is still operational. They can only appeal after they have filed a federal income tax return for the base year in which the income change occurred. On a case-by-case basis, a FAC may consult with the director of financial aid (DFA) to use projected income from self-employment and review the federal income tax return for the year when the income was projected, ensuring the estimates are accurate. Additionally, consideration should be given to excluding one-time income distributions shown on base year tax returns by collecting both the base year and the previous year's federal income tax returns to confirm that the distribution was indeed a one-time occurrence.

Separation of Income: Individuals who filed a joint return, but whose marital status changed after the end of the prior calendar year and was not reflected on the FAFSA. This would include legal separation, divorce, or death of a parent or spouse that occurred after filing the FAFSA or the CADAA.

For calculating total tax:

Tax Table Method (preferred method)

Proportional Distribution Method

- New AGI/ Old AGI = %
- % x old Taxes paid= New tax paid

The FAC may use either method even if the results are different.

If the parent or student have not legally separated, but are living separate and apart, the FAC will add a request for Proof of Marital Separation and the student/parent must upload supporting documentation (i.e., rental/lease/mortgage agreement indicating separate addresses, etc.).

All PJ changes must be made in the FPS, the CSAC/WebGrants system, and the CampusLogic Student Forms systems.

10.3 Requests for PJ Consideration

Policies

When describing your policies for considering PJ requests from students and parents, include details such as:

- The method by which students and parents may submit requests (e.g., your school generally requires all PJ requests to be uploaded via the school's web-based portal, but allows exceptions under certain circumstances)
- Deadlines by which requests for PJ consideration must be received
- Supporting documentation required by the school, including time frames and deadlines for submission
- Signature requirements (e.g., at least one parent must sign a PJ request submitted for a dependent student)
- The financial aid office's philosophy on treatment of PJ requests made by the same student or parents in subsequent years (e.g., imposing a one-year limit on a student who requests PJ consideration every year based on the same set of circumstances)

Response:

Students who wish to appeal should first schedule a meeting with a FAC to discuss their specific circumstances. During this meeting, the FAC will help determine the required documentation needed to support the appeal.

There is no deadline for students to submit a PJ request. A PJ request can be applied either before or after the financial aid packaging process.

Procedures

Describe the process of how students and parents submit requests for PJ consideration to the financial aid office and outline the actions taken once PJ requests are received. Include information such as:

- How students and parents are made aware that PJ consideration may be requested, and adjustments may be possible (to the extent allowable under school policy), keeping in mind, schools **must** publicly disclose that students may request a PJ based on special or unusual circumstances
- **Schools are required to review all requests for a determination of independence as soon as possible, but no later than 60 days after the student enrolls**
- Any institutional forms or other documentation required by the school(You may wish to cross-reference the forms and correspondence and the document collection and tracking sections of your manual here.)

Resources:

GEN-22-15
2025-26 FSA Handbook, Vol. AVG, Ch. 5

- How requests are routed to appropriate financial aid office personnel
- Actions taken if PJ requests or other documents are submitted without required signature(s) or are otherwise incomplete
- Actions taken when requests are submitted without adequate supporting documentation
- How and when students and parents are notified once requests are approved or denied, as well as any subsequent actions to be taken (e.g., a revised financial aid notification will be mailed within a week of any approved PJ adjustments)

Response:

If the student chooses to apply for a PJ appeal, the student can send an email to financialaid@mccd.edu.

The FAC will open an appeal in Student Forms and request documentation that will be needed for the appeal. Once the student uploads all the necessary documents into their Student Forms account, the file will fall into the "Appeal Review" section of the workflow. The FAC will then review the PJ appeal and either accept the documents or reject it with an explanation to the student explaining why it is rejected.

Timing of Determinations of Independence: The FACs will review all requests to determine independence as quickly as possible, but no later than 60 days after the student enrolls. Although, it is not intended to inhibit FACs from making such a determination when a student requests one later in an award year. The FACs will act on a request for a determination of independence within 60 days of the student making such a request. MCCD may only accept such requests if a student provides the requested documentation within the 60-day timeframe.

10.4 PJ Documentation

The law gives the financial aid administrator the authority to request supplemental information beyond that which is reported on the FAFSA and to collect other documentation which supports a well-informed, well-reasoned PJ decision. This is important because the special or unusual circumstances upon which a PJ decision is based, as well as any actions taken as a result of that decision, must be thoroughly documented in the student's file. If you decide a student's situation does not warrant special consideration, this decision must also be noted and maintained in the student's file.

Resources:

GEN-08-12
HEA 479A
GEN-17-08
2025-26 FSA Handbook, Vol. AVG, Ch. 5
GEN-11-15
GEN-22-15
GEN-16-03
GEN-03-07

Note, all dependency overrides and determinations of homelessness will carry over to the following year. Schools will not have to reconfirm each year unless there is conflicting information.

Policies

Describe your policies regarding PJ documentation, including dependency overrides accepted from other institutions. Provide examples of acceptable documentation for specific circumstances (e.g., a student who incurs unusually high childcare expenses might submit a statement of costs from a day care center or copies of cancelled checks, as well as an explanation of why it is necessary to incur childcare expenses that are higher than normal for that community).

Include examples of documentation required for PJ requests by the same student or parent in subsequent years (e.g., a student who requests a budget increase to include additional transportation expenses three years in a row).

Describe the consequences of failing to submit complete and accurate documentation and note any deadlines by which documents must be received. You may wish to cross-reference the forms and correspondence section of your manual here.

Response:

Special Circumstances: Students, spouses, or contributors requesting the use of an income adjustment must submit the following in all cases:

- A completed appeal form via the student's Student Forms account.
- A 2024 federal tax return including all schedules, W2s, 1099s, etc.

- If using projected year income, the required projected year income form via Student Forms, along with any required documentation to substantiate a projected year income. The FAC needs to be sure to verify any other untaxed income/benefits received in the base year (i.e., unemployment compensation, worker's compensation, Social Security payments, disability payments, child support, etc.) The verification submitted must indicate the total amount per month received.
- All required supporting documentation based on the circumstances. *
- Verification of family size and number in college.

Acceptable unemployment documentation should be submitted no more than 90 days from the date it was issued. However, MCCD may use discretion to accept documentation older than 90 days under their general professional judgment authority if they do not have reason to believe there is conflicting information.

* **Additional Documentation:** Students/parents must also include the following additional documentation according to the specific circumstance:

Loss of employment/income (laid off, reduction of hours)

- Unemployment award letter.
- Termination notices from employers.
- Copy of the latest paycheck stub issued by employers (should include year-to-date gross income).

Other loss of income (alimony, child support, retirement/pension, social security (taxed), workers' compensation, or military discharge benefits). For benefits received that have ceased or have been reduced, the following documentation is required:

- A benefit statement listing the total amount received
- A revised benefit statement and/or court documents listing updated amounts to receive with an effective date.

If a legal separation, divorce, or separation occurred after filing the FAFSA or CADAA. MCCD would need to address whether marital status changes after filing the FAFSA or CADAA would benefit the student to make the change. If it does not benefit the student, then MCCD should use the original FAFSA information. If MCCD determines it would benefit the student, the following documentation would be needed:

- Alimony (spousal support) and/or child support agreements, proof of when payments start/end if applicable
- Divorce decree or legal separation agreement and proof of separate residences, i.e., utility bills, lease agreement, etc.

Death of a parent or spouse if the death occurred after filing the FAFSA or CADAA:

Death certificate.

One-time non-recurring lump sum payment received:

- Documents detailing one-time payment amount, source, and reason.

Out-of-pocket medical or extraordinary expenses were paid:

- Documents detailing out-of-pocket expense amount(s) not covered by insurance, source(s), and reason(s).

Number in college:

- A billing statement from the other college showing all charges and how much is owed will be required..

Cost of attendance changes:

- Receipts depending upon the nature of the expense.

Unusual Circumstances: Students requesting a dependency override must submit the following in all cases:

- The unusual circumstances form in Student Forms.
- A letter from a professional person, third-party sources knowledgeable of the student's unusual circumstances. The third-party sources may include a teacher, counselor, medical authority, member of the clergy, prison administrator, government agency, or court and should provide enough details to establish the unusual circumstances.
- A letter from a person having comprehensive knowledge regarding the existence of the adverse condition.

Dependency overrides will carry over from one year to the next. All documentation can be carried forward to the current award year without another dependency override needing to be submitted. Dependency overrides granted by other institutions are not automatically honored at MCCD. The FAC must verify that the student is independent based on documentation submitted to the financial aid office.

Procedures

Describe the process of requesting PJ documentation. Include details such as:

- How the student or parent is notified of documentation submission requirements
- How the student or parent is informed of the specific type of document they must submit (e.g., a doctor's statement for a parent who has lost wages due to a prolonged illness)
- Actions taken if requested documentation is insufficient or unclear (e.g., the financial aid counselor calls the student to clarify the information verbally and then notes conversation in the student's file, or the counselor mails the document back to the student requesting written clarification)
- Actions taken if required documents are submitted after deadlines have passed

You may wish to cross-reference the document collection and tracking section of your manual here.

Response:

Students who wish to appeal should first schedule a meeting with a FAC to discuss their specific circumstances. During this meeting, the FAC will help determine the required documentation needed to support the appeal.

10.X - Reserved for Institutional Use

This section is reserved for any institution-specific area of policies and procedures not covered in previous sections. It may be necessary to include several sub-sections of institution-specific content within this area. If there is no institutional content, simply leave the area blank, or mark the box Complete as preferred.

Section 11: Disbursements

11.1 Definition of Disbursements and Disbursement Methods

Policies

The financial aid office staff should be aware of institutional policies and procedures regarding the disbursement of Title IV funds even though these activities are under the purview of another office. (See Section 2.1 regarding the separation of functions.) Awareness of the institution's disbursement practices will assist the financial aid office in providing better counseling and clearer instructions regarding how students and parent PLUS borrowers receive Title IV funds for which they are eligible. You may want to cross-reference the responsible office's disbursement policies here.

Define disbursement and state your institution's policies for disbursing Title IV funds in a timely manner by crediting the student's institutional ledger account and/or by making direct payments to students and parent PLUS borrowers. If the funds are directly disbursed, include specific information regarding how the funds are paid [i.e., by check, electronic funds transfer (EFT) to a designated financial account, and/or cash]. Address whether your school:

- Uses institutional funds in advance of receiving Title IV funds to make disbursements to students and/or parent PLUS borrowers
- Shows a student's institutional charges have been offset by Title IV funds when no monies (institutional or federal) have been credited to the student's institutional ledger account
- Disburses Title IV funds only after the receipt of Title IV funds

If your school is not a foreign institution, identify whether your school disburses Title IV funds under a:

- Tier one (T1) arrangement with a third-party servicer under which the third-party servicer performs one or more functions associated with processing direct payments of Title IV funds to students on behalf of the school, and offers one or more financial accounts under the arrangement or directly markets the account to students itself or through an intermediary
- Tier two (T2) arrangement between the school and a financial institution, or an entity that offers financial accounts through a financial institution, under the financial accounts are offered and marketed directly to students enrolled at your school

Describe your institution's policy for providing a way for a Title IV eligible student to obtain or purchase, by the seventh day of a payment period, the books and supplies required for the payment period if, 10 days before the beginning of the payment period:

- The school could disburse the Title IV funds for which the student is eligible
- Presuming the funds were disbursed, the student would have a Title IV credit balance

Also, describe the institution's policy under which a Title IV eligible student may opt out of the method the school provides for the student to obtain or purchase books and supplies.

Include a statement that the institution may not penalize Title IV recipients for nonpayment of fees due to financial aid regulations or delays attributable to the school (e.g., if the school is subject to the 30-day delayed disbursement provisions for first-time student borrowers).

If Prison Education Programs (PEPs) are offered, the school must ensure confined or incarcerated students do not receive Title IV credit balances.

Response:

The Merced Community College District (MCCD) financial aid offices determine the student's eligibility for financial aid, and the student fees office is responsible for the disbursement of the financial aid funds. Students receiving financial aid will have all funds directly applied towards their charges on their student account. If part of the aid includes scholarships and grants, they will be used before any loans to pay for charges (tuition and mandatory institutional fees) If the financial aid funds exceed a student's institutional charges, the student fees office will issue the credit refund for the remaining credit balance.

The MCCD has a tier one (T1) arrangement with a third-party servicer called BankMobile

Resources:

668.16(c)(2)
GEN-23-08
668.16(s)
668.162
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024
Electronic Announcement, 11/21/23 (GENERAL-23-106)
668.163
GEN-16-15
668.161(a)(1)
Prison Education Program Questions and Answers
GEN-23-03
668.164(c)
675.16(e)
668.161(b)(i),(iii)-(vi),(viii)-(ix)
GEN-22-14
668.164(d)
Federal Register, 10/30/15, pp. 67127 to 67128, 67141 to 67151
675.16(a)(9)
668.164(e)
Electronic Announcement, 5/12/16, Cash Management Q&A
668.164(f)
668.164(a)
668.14(b)(21)
685.303(b)(5)
668.164(m)

Disbursements, a technology solution, powered by BMTX, Inc. for the disbursing of credit refunds.

Procedures

Describe any procedures carried out by the financial aid office related to each disbursement method used by the school. Describe any procedures used to provide qualifying Title IV eligible students a way to obtain or purchase, by the seventh day of a payment period, required books and supplies. Include procedures for identifying qualifying Title IV recipients under the special provisions for books and supplies. Also indicate the procedures a Title IV eligible student may follow to opt out of the method the school provides for the student to obtain or purchase books and supplies.

Include institutional safeguards that ensure the separation of functions. Also indicate safeguards that prevent penalizing Title IV recipients for nonpayment of fees due to financial aid rules or disbursement/delivery delays attributable to the school.

Response:

For students to be able to purchase books and other course materials by the seventh day of a payment period, Merced Community College District (MCCD) has implemented the Smart Start Course Materials Program. MCCD has an opt-out model and includes digital and physical required materials. This means that all students are automatically enrolled in the Smart Start program when they register for their courses. Students who are not interested in the material savings can opt out of the program each term with no penalty.

When students register for classes, a $21.50 per unit charge called Smart Start allows students to access their materials on the first day of class. This is a mandatory charge, but also the students can opt out.

Resources:

668.164(m)

11.1.1 Disbursing Title IV Funds Under a T1 Arrangement

(See also 11.3.6 regarding student consent to receive direct disbursements under a T1 arrangement)

Resources:

668.164(e)

Resources:

GEN-23-08
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024
668.164(e)(2)(ix)
GEN-16-15
668.164(e)(2)(v)
668.164(e)(2)(i)
668.164(e)(2)(ii)
668.164(e)(2)(iv)
GEN-23-03
GEN-22-14
Federal Register, 10/30/15, pp. 67173 to 67174
668.164(e)

Policies

If your school disburses Title IV funds under a T1 arrangement, state your school's policy for offering enrolled students the option of receiving direct payment of their Title IV funds through deposits to a financial account offered, or designated by the student, under the arrangement. Describe criteria used to choose which financial accounts to offer students. Include policies for ensuring that for each financial account the school offers under the agreement:

- The terms of financial account(s) offered enrolled students under the arrangement are not inconsistent with the best interests of students opening them
- The financial account or access device is not marketed or portrayed as, or converted into, a credit card
- No personally identifiable information about a student is shared with the third-party servicer and no access device, or any representation of an access device, is sent to the student before the student chooses to open a financial account offered

- Students do not incur any cost for opening the account or initially receiving an access device, and as specified in the regulations, for point-of-sale transactions, balance inquiries, or withdrawals
- Students have convenient access to the Title IV funds held in their account, including at the times the school or third-party servicer makes direct payments of Title IV funds into the financial accounts

Response:

The MCCD has a tier one (T1) arrangement with a third-party servicer called BankMobile Disbursements, a technology solution, powered by BMTX, Inc. for the disbursing of credit refunds.

The student has choices on how to receive their refund:

- Deposit to an existing account: the funds are transferred to an existing account the same business day BankMobile receives funds from the school. It takes one or two business days for the receiving bank to credit the money to a student's account.
- Deposit to a BankMobile Vibe checking account: If a student opens a BankMobile Vibe checking account, funds are deposited on the same business day BankMobile receives funds from the school.

Paper check: If the student does not choose one of the above two options, a paper check will be issued to the student. Students are instructed to be sure their address is updated by visiting the admissions and records office in person

Procedures

Describe procedures for making direct disbursements of Title IV funds under the T1 arrangement to a financial account opened by the school or third-party servicer or designated by the student, including who is responsible for making the direct disbursements, how the disbursements are made, and when. Include procedures for students to obtain any device needed to access the disbursed Title IV funds.

Describe procedures for disclosing the contract for any T1 arrangement on the school's website and providing the U.S. Department of Education (ED) with an up-to-date URL for the contract.

Response:

Instructions are available to all students on the school's financial aid website. Students have the option to choose which option they want to receive their Title IV fund by logging onto their student portal and choosing the BankMobile button under the financial aid section. The student fees office is responsible for handling and monitoring the BankMobile transactions.

Resources:

668.164(d)(1)
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024
668.164(e)
Federal Register, 10/30/15, pp. 67169 to 67172
GEN-23-08
GEN-23-03
GEN-22-14
GEN-16-15
668.164(e)(2)(vii)
668.164(e)(2)(viii)

The BankMoble contract is available on the school website.

11.1.2 Disbursing Title IV Funds Under a T2 Arrangement

(See also 11.3.6 regarding consent to receive direct disbursements under a T2 arrangement)

Resources:

668.164(f)

Resources:

668.164(f)(2)
668.164(f)(3)
GEN-23-08
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024
GEN-16-15
668.164(f)(4)(xi)
668.164(f)(4)(viii)
GEN-23-03
668.164(f)(4)(vii)
668.164(f)(4)(i)
668.164(f)(4)(x)
GEN-22-14
668.164(f)(4)(vi)

Federal Register, 10/30/15, pp. 67173 to 67174

Policies

If your school disburses Title IV funds under a T2 arrangement, state your school's policy for offering enrolled students the option of receiving direct payment of their Title IV funds through deposits to a financial account offered, or designated by the student, under the arrangement. Describe criteria used to choose which financial accounts to offer students. Include policies for ensuring that for each financial account the school offers under the agreement:

- Complies with regulatory requirements related to the marketing and the cobranding of the account with the school's name, logo, mascot, or other affiliation
- The terms of financial account(s) offered enrolled students under the arrangement are not inconsistent with the best interests of students opening them
- The financial account or access device is not marketed or portrayed as, or converted into, a credit card
- No personally identifiable information about a student is shared with a financial institution, or its agents, and no access device, or any representation of an access device, is sent to the student before the student chooses to open a financial account offered
- Students do not incur any cost for opening the account or initially receiving or validating an access device
- Students have reasonable access to the Title IV funds held in their account, including at the times the school or third-party servicer makes direct payments of Title IV funds into the financial accounts

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe procedures for making direct disbursements of Title IV funds to a financial account under a T2 arrangement, including who is responsible for making the direct disbursements, how the disbursements are made, and when. Include procedures for students to obtain any device needed to access the disbursed Title IV funds.

Describe procedures for disclosing the contract for any T2 arrangement conspicuously on the school's website and providing ED with an up-to-date URL for the contract.

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Resources:

668.164(d)(1)(A)
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024
668.164(f)
Federal Register, 10/30/15, pp. 67169 to 67172
GEN-23-08
GEN-23-03
GEN-22-14
GEN-16-15
668.164(f)(4)(iv), (v)

11.2 Disbursement Dates and Schedules

Policies

Define the payment period(s) for each of your school's Title IV eligible academic programs. Identify the disbursement timeframe for each payment period, including the earliest a Title IV disbursement (other than Federal Work-Study [FWS]) will be made. Address whether your school will pay a student's Title IV funds in a single payment or in installments during the payment period, the conditions for doing so, and which Title IV program disbursements (other than FWS) will be paid in installments during the payment period. You may want to cross-reference the responsible office's policies here. You may also wish to cross-reference all applicable program-specific sections of the manual.

Address your institution's policies regarding late disbursements, including retroactive payments for completed payment periods. Define the difference between late disbursements and post-withdrawal disbursements. (See Section 13.4 regarding post-withdrawal disbursements.) Describe the financial aid office's involvement, if any, in determining eligibility for late and retroactive disbursements.

Indicate who is responsible for establishing disbursement schedules for Federal Direct Student Loans

Resources:

668.164(i)
668.164(b)
668.164(j)
Federal Register 11/1/07, p. 62017
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024
Federal Register 8/8/07, pp. 44623, 44636 to 44639
668.164(k)
2025-26 FSA Handbook, Vol. 3, Ch. 1
685.303(d)

(Direct Loans) and what those schedules generally are.

Response:

The payment periods for financial aid correspond to the fall, spring, and summer payment periods. For financial aid purposes, the summer period is a trailer. The fall and spring periods are substantially equal in length. Federal Direct loans are released according to the payment period. However, the subsidized and unsubsidized loans cannot be released until the student has completed the master promissory note (MPN) and entrance counseling.

The payment dates are listed on the school's financial aid website. The director of financial aid (DFA) establishes the disbursement date schedule. The dates listed on the website are for all financial aid disbursements.

Pell Enrollment Intensity: Pell Grant payments will be based on unit level. Enrollment intensity is the percentage of full-time enrollment at which a student is enrolled, rounded to the nearest whole percent. For example, if full-time enrollment is 12 credit hours and the student is enrolled in 7 credit hours, the enrollment intensity would be 7 ÷ 12 × 100% = 58.3% (rounded to 58%). SEOG, Cal Grant, and other state grants are prorated based on a student's enrollment status per term.

Regarding late disbursements, the deadline dates listed on the website indicate the last day to submit a student loan application. Federal Direct Loans are not automatically awarded based upon the student's FAFSA data and grade level. The student must request a loan by completing the student loan application. For a student to be eligible for a late disbursement, the Federal Direct Loan would need to have been originated, and the student would need to have completed the MPN and the entrance counseling.

668.4
668.164(a)

Procedures

Describe how:

- The financial aid office is informed about the school's disbursement schedules if another office establishes the schedules
- Students are informed of disbursement schedules
- Late disbursements are authorized and reconciled

Cross-reference the procedures of all offices involved. You may want to cross-reference the student consumer information and program-specific sections of your manual, as well.

Response:

The payment dates are listed on the school's financial aid website. The MCCD financial aid offices establish the disbursement date schedule. The Schedule of Payments dates listed on the website are for all financial aid disbursements.

11.3 Student and Parent Authorizations

Policies

Students and, in the case of parent PLUS, parents may authorize the school to:

- Disburse Title IV funds by crediting the student's account to pay for educationally-related goods and services at bookstores or book exchanges operated by entities having a lease or contractual arrangement with the institution
- Disburse FWS funds by crediting the student's institutional ledger account to pay allowable current award year charges for tuition, fees, contracted food and housing, and other institutionally-provided, educationally-related goods and services
- Disburse FWS funds by crediting the student's institutional ledger account to pay allowable prior award year charges
- Disburse Title IV funds (other than FWS) by crediting the student's institutional ledger account to pay allowable current award year, educationally-related institutional charges other than tuition, fees, and contracted food and housing

Resources:

668.165(b)(1)(ii)
668.164(d)(4)
675.16(b)(1)(ii)
GEN-12-21
668.164(e)(2)
675.16(d)(1)(ii)
668.164(f)(4)
675.16(b)(1)(i)
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024
668.165(b)
668.164(c)
Federal Register, 10/30/15, pp. 67151 to 67155

- 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 food and housing

- Hold, on behalf of the student or parent, excess Title IV funds (credit balances) on the student's institutional ledger account

- Disburse Title IV funds under a T1 or T2 arrangement to a financial account opened by the school or designated by the student

Schools are not required to offer students and parent PLUS borrowers the services covered by these authorizations. Schools also have the option of offering the services only to certain groups of students and/or parent PLUS borrowers. In addition, different institutional offices may be responsible for collecting authorizations. Identify each service your school offers that requires an authorization and which office is responsible for collecting the authorization. If another office is responsible, you may want to cross-reference that office's policies and procedures here or in the appropriate authorization subsection that follows.

Response:

The MCCD financial aid offices disburses all Title IV funds to the student by crediting the student's account. Any excess Title IV funds are released to the student and are never held on the student's account.

It is the policy of the MCCD financial aid offices to not offer Federal Direct Parent PLUS loans,

Federal work study (FWS) students do not have the option to have their FWS funds posted to their account. FWS wages are paid by the payroll office on the 10th of each month for the hours worked, Students have the option to have the payments directly deposited to the student's savings or checking account.

11.3.1 Disbursing FWS Funds to Pay Current Award Year, Institutional Charges for Tuition, Fees, Contracted Food and Housing, and Other Allowable, Educationally-Related Goods and Services

Policies

State your school's policy for obtaining a student's authorization to disburse FWS wages by crediting the student's institutional ledger account to pay current award year charges for tuition, fees, contracted food and housing, and other allowable, educationally-related goods and services. Specify how frequently this authorization is collected and its duration. Identify whether your school:

- Offers this service to all or only certain categories of FWS recipients
- Has an established deadline for students to request this service

Resources:

668.164(c)(3)(ii)(A)
668.164(c)(4)
668.164(c)(5)
675.16(d)(1)(i)
675.16(b)(1)(i)
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe procedures for informing students of this service, for collecting the authorization without coercing the student, and for complying with a request to modify or cancel an authorization. Identify who is responsible for these processes.

If your school uses electronic processes to obtain the authorization, describe institutional safeguards to prevent fraud and abuse.

Resources:

2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024
675.16(d)(2)-(4)

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

11.3.2 Disbursing FWS Funds to Pay Allowable, Prior Award Year, Institutional Charges

Policies

State your school's policy for obtaining a student's authorization to disburse FWS wages by crediting

Resources:

the student's institutional ledger account to pay allowable prior award year charges. Include the school's policy for ensuring no more than $200, in current award year funds from all Title IV programs, is used to satisfy a student's prior award year charges. Specify how frequently this authorization is collected and its duration. Identify whether your school:

- Offers this service to all or only certain categories of FWS recipients
- Has an established deadline for students to request this service

668.164(c)(3)(ii)(B)
675.16(b)(1)(ii)
675.16(b)(2)
675.16(d)(1)(i)
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe procedures for informing students of this service, for collecting the authorization without coercing the student, and for complying with a request to modify or cancel an authorization. Identify who is responsible for these processes.

If your school uses electronic processes to obtain the authorization, describe institutional safeguards to prevent fraud and abuse.

Resources:

2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024
675.16(d)(2)-(4)

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

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 Food and Housing

Policies

State your school's policy for obtaining a student's and parent PLUS borrower's authorization to disburse Title IV funds by crediting the student's institutional ledger account to pay allowable, current year, educationally-related charges other than tuition, fees, and contracted food and housing. Identify whether your school:

- Offers this service for the disbursement of all or only certain Title IV program funds
- Offers this service to all or only certain categories of Title IV recipients
- Has an established deadline for students and parent PLUS borrowers to request this service

Resources:

668.164(c)(3)(ii)(A)
668.165(b)(1)(i)
668.164(c)(4)
668.164(c)(5)
GEN-22-15
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe procedures for informing students and parents of this service, for collecting the authorization without coercing the student or parent, and for complying with a request to modify or cancel an authorization. Identify who is responsible for these processes.

If the school uses electronic processes to obtain the authorization, describe institutional safeguards to prevent fraud and abuse.

Resources:

668.165(b)(2)-(4)
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

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 Food and Housing

Policies

State your school's policy for obtaining a student's and a parent PLUS borrower's authorization to disburse current year Title IV funds by crediting the student's institutional ledger account to pay prior award year, allowable, educationally-related charges other than tuition, fees, and contracted food and housing. Include the school's policy for ensuring no more than $200, in current award year funds from all Title IV programs, is used to satisfy a student's prior award year institutional charges. Specify how frequently this authorization is collected and its duration. Identify whether your school:

- Offers this service for the disbursement of all or only certain Title IV program funds
- Offers this service to all or only certain categories of Title IV recipients

Resources:

668.164(c)(3)(ii)(B)
668.165(b)(1)(i)
GEN-22-15
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024

- Has an established deadline for students and parent PLUS borrowers to request this service

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe procedures for informing students and parents of this service, for collecting the authorization without coercing the student or parent, and for complying with a request to modify or cancel an authorization. Identify who is responsible for these processes.

If your school uses electronic processes to obtain the authorization, describe institutional safeguards to prevent fraud and abuse.

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Resources:

668.165(b)(2)-(4)
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024

11.3.5 Holding Excess Title IV Funds (Credit Balances)

Policies

State your school's policy for obtaining a student's and a parent PLUS borrower's authorization to hold excess Title IV funds on the student's institutional ledger account. For each Title IV program for which funds are held, indicate the maximum period the school will hold funds. Specify how frequently this authorization is collected and its duration. Identify whether your school:

- Offers this service for the disbursement of all or only certain Title IV program funds
- Offers this service to all or certain categories of Title IV recipients
- Has an established deadline for students and parent PLUS borrowers to request this service

If Prison Education Programs (PEPs) are offered, the school must ensure confined or incarcerated students do not receive Title IV credit balances.

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Resources:

668.165(b)(1)(ii)
668.165(b)(5)(iii)
675.16(d)(1)(ii)
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024
Electronic Announcement, 11/21/23 (GENERAL-23-106)
Prison Education Program Questions and Answers

Procedures

Describe procedures for informing students and parents of this service, for collecting the authorization without coercing the student or parent, and for complying with a request to modify or cancel an authorization. Identify who is responsible for these processes. Describe how the funds are held, accounted for, and released by the end of the maximum holding period. Identify who is responsible for monitoring any Title IV funds held.

If your school uses electronic processes to obtain the authorization, describe institutional safeguards to prevent fraud and abuse.

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Resources:

668.165(b)(2)-(5)
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024
675.16(d)(2)-(5)
Electronic Announcement, 11/21/23 (GENERAL-23-106)

11.3.6 Disbursing Title IV Funds Under a T1 or T2 Arrangement

Policies

If, under a T1 or T2 arrangement, the school disburses Title IV funds into a financial account opened by the school or designated by the student, the school should describe its policy for providing students the option to receive Title IV funds under T1 or T2 arrangement and to obtain the student's written confirmation to open the financial account or to designate a financial account.

Response:

See Section 11.1.1 Disbursing Title IV Funds Under a T1 Arrangement

Resources:

668.164(d)(4)
668.164(e)(2)
668.164(f)(4)
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024

Procedures

Describe the procedures for developing and implementing a selection process and the procedures for the student to exercise their option to receive Title IV disbursement under a T1 arrangement and, if applicable, a T2 arrangement, including when students are given the option to make a selection

Resources:

668.164(d)(4)
2024-25 FSA Handbook, Vol. 4,

and who is responsible for monitoring the section process. Describe the steps the school will take if a student changes their previously selected payment option.

If your school uses electronic processes to obtain the authorization, describe institutional safeguards to prevent fraud and abuse.

Response:

See Section 11.1.1 Disbursing Title IV Funds Under a T1 Arrangement

Ch. 2, April 2024
668.164(e)(2)
668.164(f)(4)
Federal Register, 10/30/15, pp. 67151 to 67157

11.4 Student and Parent Notifications

Policies

Under certain circumstances, schools are required to provide notifications to students and parent PLUS borrowers. (See also Section 13.4 for notifications related to post-withdrawal disbursements.) A school must:

- Notify a student of the amount of funds the student and/or their parent can expect to receive under each Title IV program, including the amount of FWS authorized to be earned, and how and when the funds will be disbursed
- Notify a borrower of a Title IV loan's anticipated disbursement date and amount, their right to cancel all or a portion of the loan, and the procedures and time frame for requesting cancellation if the school disburses the loan proceeds by crediting the student's account
- Notify a Teacher Education Assistance for College and Higher Education (TEACH) Grant recipient of the grant's anticipated disbursement date and amount, their right to cancel all or a portion of the grant, and the procedures and time frame for requesting cancellation if the school disburses the grant's proceeds by crediting the student's account

Different institutional offices may be responsible for providing the notifications. If another office is responsible, you may want to cross-reference that office's policies and procedures here or in the appropriate notification subsection that follows.

Response:

If a student wants to receive a Federal Direct Loan as part of their award package, they must send a request to the financial aid email from their Merced College student's email account. Federal Direct Loan applicants must meet the following minimum requirements:

- Have a completed financial aid file with no outstanding tasks.
- Be making Satisfactory Academic Progress (SAP).
- Be enrolled in a minimum of six units of non-remedial/non-ESL coursework.

The financial aid office will review the student's financial aid file to ensure they meet all the above requirements and are eligible to receive and complete a Federal Direct Loan request form.

- If the student is eligible, they will be advised to complete the Merced College Financial Aid Direct Loan Questionnaire.
- If the student is not eligible, they will receive an email explaining why.

Students are advised to refer to the Schedule of Payments for upcoming disbursements. The actual disbursement date will be confirmed on the loan notification that is sent to the student's email.

Please note:

- Borrowers have a right to cancel all or a portion of their loan. Students have a 14-day window after disbursement to cancel or modify their loan. This notice is on the application along with an email notification.
- Merced College has the right to reduce or deny loans on a case-by-case basis.

Resources:

668.165(a)(2)-(6)
675.16(a)(3)
668.165(a)(1)
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024
686.31(e)

11.4.1 Amounts of Expected Title IV Funds and Disbursement Information

Policies

State your school's policy for notifying a student of the amount the student and/or their parent can expect to receive under each Title IV program, including the amount of FWS authorized to be earned, and how and when those funds will be disbursed.

Resources:

675.16(a)(3)
668.165(a)(1)

Response:

The MCCD financial aid offices send a financial aid offer notification email with a link to the students' MC Portal account to review their financial aid awards.

Procedures

Describe your school's procedures for providing this notification, including when it is sent, and the format used. If your school uses electronic processes to provide the notification, describe institutional safeguards to ensure the security and confidentiality of the student's information. Identify the institutional office responsible for sending the notification. If more than one office is responsible for complying with this notification requirement, describe the information each office is responsible for providing.

Resources:

2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024

Response:

The MCCD financial aid offices send an electronic notification of disbursements to the student's school email address. Students wishing to view their financial aid offer and disbursement notifications must login with their school credentials.

11.4.2 Crediting Title IV Loan Proceeds and the Borrower's Cancellation Right

Policies

State your school's policy for notifying a borrower about the crediting of Title IV loan proceeds to the student's institutional account, the loan's anticipated disbursement amount and date, and the borrower's right to cancel the loan or disbursement. Include your school's policy for honoring cancellation requests received after the deadline for requesting cancellation.

Resources:

668.165(a)(2)-(6)

Response:

Student borrowers have a right to cancel all r a portion of their loan. Students have a 14-day window after disbursement to cancel or modify their loan. This notice is on the student loan application and disbursement notification.

Procedures

Describe your school's procedures for providing this notification, including when it is sent, and the format used. If the school uses electronic processes to provide the notification, describe institutional safeguards to ensure the security and confidentiality of the student's information. Identify the institutional office responsible for sending the notification.

Resources:

2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024

Describe the procedures for responding to a borrower's request for the cancellation or reduction of the loan, including the school's affirmative confirmation process if your school uses one. Identify who is responsible for monitoring borrower requests for loan cancellation or reduction, returning loan proceeds, and informing the borrower of the outcome of a cancellation request.

If more than one office is responsible for complying with this notification requirement, describe each office's responsibilities.

Response:

The MCCD financial aid offices notify the students by email of the right to cancel at the time of the disbursement. The student borrower is advised to contact the financial aid office by email if they want to cancel or modify their loan. The email is forwarded to a financial aid technician to review and work with the financial aid coordinator or the DFA to make the required adjustments.

11.4.3 Crediting TEACH Grant Funds and the Student's Cancellation Right

Policies

State your school's policy for notifying a student about the crediting of TEACH Grant funds to the student's institutional account, the anticipated disbursement amount and date, and the student's right to cancel the grant or disbursement. Include your school's policy for honoring cancellation requests received after the deadline for requesting cancellation.

Resources:

668.165(a)(2)-(6)
686.31(e)

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe your school's procedures for providing this notification, including when it is sent, and the format used. If the school uses electronic processes to provide the notification, describe institutional safeguards to ensure the security and confidentiality of the student's information. Identify the institutional office responsible for sending the notification.

Describe the procedures for responding to a student's request for the cancellation or reduction of the grant, including the school's affirmative confirmation process if your school uses one. Identify who is responsible for monitoring student requests for grant cancellation or reduction, returning grant funds, and informing the student of the outcome of a cancellation request. If a cancellation request is received after the regulatory deadline and the school's policy is not to honor late cancellation requests, describe the procedures for notifying the student to contact the Direct Loan servicer.

If more than one office is responsible for complying with this notification requirement, describe each office's responsibilities.

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Resources:

2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024

11.5 Undeliverable Title IV Funds

Policies

State your school's policy for returning, to the appropriate program account, Title IV funds the school is unable to disburse directly to the student or parent PLUS borrower (i.e., checks returned to the school as undeliverable or electronic fund transfers [EFTs] that are rejected). Indicate whether your school attempts to locate the student or parent PLUS borrower before returning the undeliverable Title IV funds.

Response:

The financial aid office and the student fees office work together in the case of undeliverable Title IV funds. Most funds are disbursed to the student through the BankMobile process. If the student has not set up their disbursement preference, BankMobile will mail a check 21 days after the disbursement. The student fees office, along with BankMobile, will attempt to contact the student by email and phone to encourage the student to set up a direct deposit.

Procedures

Describe your school's procedures for handling undeliverable Title IV funds, including all measures the school takes to locate the student or parent PLUS borrower. Explain procedures for ensuring undeliverable Title IV funds do not escheat to the state, the institution, or any third party, and that they are returned to the appropriate program account within the regulatory time frame. Describe how the financial aid office is informed of any Title IV funds returned.

Cross-reference the procedures of all offices involved.

Response:

The student fees office receives a list of undeliverable funds that have not been received by the student or are stale dated. The student fees office will attempt to contact the student by email and by phone to try to verify the address where the check was sent.

If the student cannot be reached within a reasonable period, the student fees office will work with the financial aid office to return the funds back to the appropriate fund source. The student will be notified of this revision to their original financial aid offer.

Resources:

668.164(l)
2024-25 FSA Handbook, Vol. 4, Ch. 1, April 2024
2024-25 FSA Handbook, Vol. 4, Ch. 2, April 2024

11.6 Recovery of Title IV Disbursements When Student Does Not Begin Attendance

Policies

State your school's policy for monitoring student enrollment to determine whether a student began attendance in a payment period, and thus, is eligible for Title IV assistance for the payment period. If your school is not required to take attendance, include the school's policy for documenting that the student began attendance in the payment period. Address the treatment of disbursed Title IV funds if a student does not begin attendance or the school cannot document that the student began

Resources:

674.16(f)
685.303(b)(4)
2024-25 FSA Handbook, Vol. 4, Ch. 3, April 2024

attendance in a payment period.

676.16(d)
GEN-13-02
668.21

Response:

Title IV funds are not disbursed if a student does not begin attendance. The MCCD financial aid offices utilize the student information system (SIS) system to monitor enrollment. The Pell Grant and Cal Grant freeze date (census day) will be applied to determine course enrollment eligibility. The number of units a student is enrolled in by the census day will determine the amount of Pell Grant or Cal Grant is awarded.

Procedures

Describe your school's procedures for monitoring whether a student begins attendance in a payment period. Address which office is responsible and how attendance is documented. Explain how the financial aid office is informed if a student never begins attendance in a payment period or the student's attendance cannot be documented.

Cross-reference the procedures of all institutional offices involved.

Response:

The financial aid office also runs a process on a weekly basis to see if any students have completely withdrawn for Return to Title IV (R2T4) purposes. If needed, a calculation is performed to determine any institutional or student liabilities, or a post-withdrawal disbursement due.

11.X - Reserved for Institutional Use

This section is reserved for any institution-specific area of policies and procedures not covered in previous sections. It may be necessary to include several sub-sections of institution-specific content within this area. If there is no institutional content, simply leave the area blank, or mark the box Complete as preferred.

Section 12: Satisfactory Academic Progress

12.1 Process Overview and Responsibilities

To be eligible for Title IV aid, a student must maintain satisfactory academic progress (SAP). Under the administrative capability requirements, your school must establish, publish, and apply reasonable standards for measuring if students are maintaining SAP. The financial aid satisfactory academic progress standards must be the same as, or stricter than, the standards the school uses for students who are not receiving Title IV aid (see section 12.2).

Because there is more than one condition the school is monitoring to determine a student's SAP, you might want to use an ***If/Then*** *Decision Table* to chart your policies. For example:

- **If** the student has made acceptable quantitative progress for the payment period or year being measured, **then** review the student's qualitative progress
- **If** the student has failed either quantitative or qualitative progress, **then** put the student on financial aid warning or deny future Title IV aid (according to your policy)
- **If** the student is enrolled in remedial courses, **then** review the total hours to ensure the student has not exceeded the allowable remedial course limit (according to your policy)

If SAP standards are established by another office, you should cross-reference the policies and procedures of that office. You could also summarize those policies in the relevant subsections below and indicate how these subsections are kept up to date.

If monitoring SAP is a responsibility shared among several offices, you should list those offices, describe the role each plays in the process, and indicate how interoffice communication is achieved.

Response:

Federal and State regulations require that all financial aid recipients maintain satisfactory academic progress (SAP) to receive financial aid. In compliance with these regulations, SAP will be checked for all students after every semester, regardless of whether financial aid was received. SAP is evaluated based on all courses taken at MCCD, plus transfer units and upper division units from prior colleges.

Students meeting all the following requirements are in SAP satisfactory status and can be considered for financial aid or reinstatement of financial aid:

- Be officially enrolled in and attending as an undergraduate, in an eligible program that leads to completion of an AA/AS/AAT/AST degree or an approved certificate program.
- Qualitative Measure: Students must maintain a minimum cumulative grade point average (GPA) of 2.0. If all classes are taken on a pass/fail basis, the GPA requirement will not apply. Instead, a percentage of passed to attempted units will be calculated. A, B, C, D, RD, and F grades are used to calculate a student's GPA. It is the student's responsibility to inform the financial aid office when an Incomplete "I" grade is changed to a letter grade and credit has been awarded. Until that time, "I" grades will be computed as attempted but not completed units. Transferable units from prior colleges are not included in the GPA calculation.
- Quantitative Measure (pace of progression}: Students must receive credit for at least 67% of the total units attempted. Withdrawal (W}, incomplete (I or IP}, no credit (NC or NP}, report delay (RD} and failing (F or FW} grades are considered units attempted. Transferable units and all upper division units from prior colleges will be included when determining a student's pace of progression.
- Maximum Timeframe: Attempted less than 150% of the maximum cumulative units required for completion of their program, for example:
  - Certificate programs: If 30 units are needed to complete the certificate program, the maximum timeframe allowed to complete the program would be 45 attempted units.
  - Degree and transfer degree programs: If 60 units or more are needed to graduate; the maximum timeframe to complete the program would be 90 attempted units

Students who have completed an AA/AS or higher will be considered to have exceeded the maximum timeframe. Individual student calculations will be based on officially enrolled eligible program requirements.

Resources:

668.16(e)
668.32(f)
2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024
668.34
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024

- Up to 30 units of remedial and ESL coursework may be excluded from the student's cumulative units attempted.
- All repeated coursework and courses disregarded under Academic Renewal will be included in the total attempted units.
- All units accepted, as well as all upper division units from prior colleges will be included when determining a student's maximum timeframe. The financial aid office reserves the right to require official academic transcripts from all prior colleges attended before determining a student's financial aid progress status.
- If at any point it is determined that the student cannot complete their course of study within the maximum timeframe, the student will be immediately disqualified from future financial aid for the remainder of his or her program, even if he or she is meeting the current SAP standards outlined above.
- Sap calculations will be determined after 12 initial units have been attempted.

Please Note: Students exceeding the maximum timeframe must re-appeal each academic year until their special program or educational plan ends.

12.2 Same As or Stricter Than

Policies

Indicate if your school's SAP policy for Title IV students is as strict as (it may be stricter than) the school's standards for students enrolled in the same educational program who are not receiving Title IV aid. This does not apply to the frequency with which the quantitative and qualitative components are checked. If the Title IV SAP policy is the same as the school's academic policy, include a statement describing how the policy meets minimum Title IV requirements (e.g., if the minimum Title IV requirement for a student in their second academic year is a "C" average or academic standing consistent with requirements for graduation; the school's academic policy would have to reflect that as well). If the Title IV SAP policy is stricter than your school's academic SAP policy, include a statement describing how the policies differ in addition to the statement describing how the policy meets Title IV requirements. Provide information about how often your Title IV SAP policy is reviewed and evaluated.

Response:

The MCCD policy meets the requirement for strictness as it matches the institutional policy for a student enrolled in the same educational program who is not receiving Title IV assistance. All enrolled students at the MCCD receiving federal, state, and institutional financial aid assistance must meet the minimum SAP standards as outlined in the SAP policy. The information is available from the following sources:

- The Merced College Catalog,
- The Merced College Website, and
- During in-person and online orientations.

Procedures

Indicate who in the financial aid office reviews the Title IV SAP policy to ensure it meets all federal requirements and describe how this is done. Include information about how the financial aid office is notified if the school changes its academic policies.

Response:

The director of financial aid (DFA) reviews the policy annually to ensure any academic policies are reflected in the SAP policy.

Resources:

668.34(a)(1)
668.42(c)(2)
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024
2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024

12.3 Categories of Students

Policies

Different SAP standards may be used for different student categories (e.g., full-time, part-time, undergraduate or graduate students, or students enrolled in certain educational programs). If your institution has established categories of students, describe these categories and the reasons for establishing them. Include a statement describing consistent treatment within each student category.

Resources:

668.34(a)(2)
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024

Define the applicable standards for each category of students as you complete subsections 12.4 to 12.8.

2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024

Response:

Merced College only has undergraduate students who must maintain a cumulative 2.0 GPA. The pace of an undergraduate student's program completion will be evaluated when a student has reached 60 attempted units. If it is determined by the financial aid office that the student will be unable to complete his/her program of study within the maximum timeframe allowed, all financial aid will be terminated.

Procedures

Describe how student categories are monitored and who is responsible for this process. Include information about any correspondence sent to these students. You may want to cross-reference any correspondence sent to these students in the forms section of the appendix.

Response:

The financial aid office will review each student's record at the end of each academic semester. Students who do not meet the SAP requirements at the end of their first semester will be notified by the financial aid office that they have been placed in financial aid warning status. If, while on financial aid warning status, students fail to meet the SAP standards for the second time, they will be placed on financial aid disqualification status and all aid for the term will be cancelled. Students can still receive the California Promise Grant (CCPG) even if they are in a financial aid disqualification status. Students may reinstate eligibility by complying with SAP standards in a term without receiving financial aid.

12.4 Qualitative Measure

Policies

Specifying a student's minimum acceptable grade point average (GPA) must be a component of the school's SAP policy. If the school does not measure GPA, the policy must include some other comparable factor that is measurable against a standard. The qualitative standard can be a fixed or a graduated standard. If a student is enrolled in a program of more than two academic years in length, at the end of the second academic year the student must have a GPA of at least a "C" or its equivalent, or have an academic standing consistent with the school's requirements for graduation. The end of the second academic year is defined as the student being enrolled in the school for four semesters or six quarters regardless of a student's enrollment status.

Resources:

668.34(a)(6)
668.34(a)(4)
2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024
ED Program Integrity Q&A — Satisfactory Academic Progress, R-Q1/R-A1, R-Q2/R-A2
668.34(a)(11)
2024-25 FSA Handbook, Vol. 2, Ch. 2, August 2024

Describe the qualitative standard students are expected to meet at the end of each payment period or year. Include information such as:

- Whether the measurement is fixed or graduated
- The frequency of measuring a student's GPA (or comparable measure)
- The minimum GPA (or comparable measure) expected at the end of each evaluation period [See section 12.5]
- A statement that at the end of the second academic year a student must have a "C" average, its equivalent, or have an academic standing consistent with graduation requirements
- How a student's GPA measurement may be affected by credits transferred from other school(s)
- The consequences of not meeting the qualitative standards (e.g., the student is put on financial aid warning, or the student is denied future Title IV aid)
- Who measures qualitative progress

Response:

Students receiving financial aid must maintain a cumulative 2.0 GPA. Grades of W, F, FW, CR, NC, P, NP, and I will be monitored and included toward the calculation of the GPA. The completion of a course grade of I (incomplete) will not be included for purposes of determining enrollment status in a subsequent term. Instructors are strongly urged to use the FW grade for students who fail due to late term withdrawal. A student with a grade of F who is being processed for payment by the financial aid office may be required to provide documentation from the grading instructor that the grade was earned by the student. The student must have attended class for the term and earned a failing grade

by such measure as determined by instruction that qualifies a grade of F.

Procedures

Provide a detailed description of how qualitative progress is checked, how frequently, and by whom. Include information such as:

- How the financial aid office receives this information (e.g., the registrar's office provides a report with qualitative information for Title IV students or the financial aid office runs an automated process after grades are official)
- How qualitative progress is documented (e.g., a notation is made in the student's file or a code is entered into the student's electronic record)
- How students are informed of qualitative progress or lack thereof (You may want to cross-reference any correspondence sent to students in the forms section of the appendix.)

Response:

The financial aid office runs the qualitative measure for SAP after every semester on all students. This is run through the Colleague SIS system. That status is reflected on the student's financial aid record in Colleague. The financial aid office will then batch post appeals in the CampusLogic/Student Forms platform. Students are notified by an email/text from Student Forms about the need to submit an appeal. It also displays the student's SAP status in Ellucian Self-Service

12.5 Quantitative Measure

Policies

The quantitative measure of SAP includes two parts. The first part is to set a maximum time frame, measured by attempted credit, clock hours or calendar time, by which a student must complete an academic program. The second part includes determining whether a student in a standard or nonstandard term, non-subscription-based program is on pace to complete the academic program within the set maximum time frame. As soon as it becomes apparent a student will be unable to complete their academic program within the maximum time frame, either by falling below the pace standard or when it becomes mathematically impossible to complete the program within the maximum time frame, the student is ineligible for Title IV aid.

- A school's policy should explain how maximum time frame, together with pace, comprise the quantitative standard
- Describe the elements of the quantitative standard, as defined in Sections 12.5.1 and 12.5.2

Note: The evaluation of pace is not required for nonterm and subscription-based programs, though maximum timeframe is still applicable to all programs, regardless of structure.

Response:

The pace of a student's program completion will be evaluated when a student has reached 60 attempted units. If it is determined by the financial aid office that the student will be unable to complete his/her program of study within the maximum timeframe allowed, all financial aid will be terminated.

Pace of Progression:

Students must complete 67% of units attempted each semester to complete their program. The financial aid office will review each student's record at the end of each semester. Students will be advised of the requirement to complete their program and to discuss their academic plan with an academic counselor.

Resources:

668.34(a)(6)
668.34(a)(5)
668.34(b), Maximum timeframe
668.34(a)(5)(ii)
2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024
Federal Register, 9/2/20, p. 54742
668.34(a)(11)
GEN-14-23
2024-25 FSA Handbook, Vol. 2, Ch. 2, August 2024

	Units Attempted	Must Complete	Units Attempted	Must Complete
PLEASE NOTE: Attempted units are all units/classes in which the student was enrolled thru census week. Therefore some W's may be included in the "attempted unit" total.	0.5	0.5	14	9.5
	1	1	14.5	10
	1.5	1	15	10
	2	1.5	15.5	10.5
	2.5	2	16	11
	3	2	16.5	11
	3.5	2.5	17	11.5
	4	3	17.5	12
	4.5	3	18	12
	5	3.5	18.5	12.5
	5.5	4	19	13
	6	4	19.5	13
	6.5	4.5	20	13.5
	7	5	20.5	14
	7.5	5	21	14
	8	5.5	21.5	14.5
	8.5	6	22	15
	9	6	22.5	15
	9.5	6.5	23	15.5
	10	7	23.5	16
	10.5	7	24	16
	11	7.5	24.5	16.5
	11.5	8	25	16.5
	12	8	25.5	17
	12.5	8.5	26	17.5
	13	9	26.5	17.5
	13.5	9		

Procedures

Provide a detailed description of how quantitative progress is checked, how frequently, and by whom. Include information such as:

- How the financial aid office receives quantitative information about Title IV recipients (e.g., registrar's office provides a report with quantitative data for Title IV recipients)
- A description of the review process (e.g., manual or automated)
- How the financial aid office documents a student's quantitative progress (e.g., notation is made in the student's file or a code is entered into the student's electronic record)
- How students are notified of their progress or lack of progress (You may want to cross-reference any correspondence sent to these students in the forms section of the appendix.)

Response:

The financial aid office runs the quantitative measure for SAP after every semester on all students. This is run through the Colleague SIS system. That status is reflected on the student's financial aid record in Colleague. The financial aid office will then batch post appeals in the CampusLogic/Student Forms platform. Students are notified by an email/text from Student Forms about the need to submit an appeal. It also displays the student's SAP status in Ellucian Self-Service

12.5.1 Maximum Timeframe

Policies

The school's satisfactory academic progress policy must specify a maximum timeframe in which an undergraduate student must complete the program. In addition, it must include a quantitative standard for students enrolled in the school's graduate program(s), if applicable. The school decides the most appropriate measurement. A school's maximum timeframe policies should include information such as:

- For credit hour programs, the standard used to measure the maximum timeframe (e.g., credit hours or calendar time)
- For clock hour programs, the standard used to measure maximum timeframe (i.e., no more than 150 percent of the published length of the program, measured in cumulative clock hours and expressed in calendar time)
- The maximum timeframe (e.g., 150 percent of credit hours attempted, calendar time, or clock hours scheduled)
- A maximum timeframe by which a graduate student must complete the program (as defined by the school if your school has a graduate program)
- A statement that part-time attendance counts in the maximum timeframe calculation
- A statement that attempted hours are counted for all terms including transfer credits, hours for which the student did not receive financial aid, as well as those the school may waive under an academic amnesty policy
- The consequences of exceeding, or being unable to complete, program requirements within the maximum timeframe (e.g., the student is denied future Title IV aid)
- A statement that a student who exceeds the maximum timeframe is ineligible for financial aid warning or financial aid probation (although a school may allow students to appeal maximum timeframe and students may be placed on an academic plan, if the appeal is approved)

Response:

The financial aid office is required to monitor students to ensure that the program of study will be completed within the maximum timeframe. The financial aid office will review each student's record at the end of each semester. Students will be advised of the requirement to complete their program and to discuss their academic plan with an academic counselor.

Students should complete their educational objective within a maximum timeframe of 150%, or 90 attempted semester units for a standard two-year program. Programs shorter than two (2) years will be monitored for completion of the same 150%-unit maximum timeframe. All completed and accepted transfer units are also counted in the 90 units attempted when used toward a degree or certificate at the MCCD.

A student who uses transfer credits from colleges outside the MCCD must submit transcripts for evaluation by an academic counselor or the admissions and records office. Those units will be included in the calculation of the 150% program for maximum timeframe.

Students with a bachelor's degree or other graduate degree are considered to have surpassed the maximum timeframe and will be required to complete a financial aid petition/appeal to be considered for a student loan.

Grades of withdrawal, fail, fail withdrawal, no credit, credit, pass, no pass, incomplete, and in progress will be monitored and included toward the calculation of the 150% maximum unit timeframe. If it is determined that the student will not be able to complete the program within the timeframe, financial aid will be discontinued without the possibility of an appeal.

Procedures

Give a detailed description of how maximum timeframe is checked and monitored, including information such as:

- How maximum timeframe is set for each academic program (e.g., if the number of allowed credits differs by major or by degree program)
- How to determine whether a student will either exceed, or be unable to complete program requirements, within the maximum timeframe

Resources:

Federal Register, 10/29/10, p. 66887
668.34(b), Maximum timeframe
2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024

- Who monitors when a student will be unable to complete their academic program within the maximum timeframe

Response:

The financial aid office runs the maximum timeframe measure for SAP after every semester on all students. This is run through the Colleague SIS system. That status is reflected on the student's financial aid record in Colleague. The financial aid office will then batch post appeals in the CampusLogic/Student Forms platform. Students are notified by an email/text from Student Forms about the need to submit an appeal. It also displays the student's SAP status in Ellucian Self-Service

12.5.2 Pace

Policies

The school's quantitative measure must specify the pace at which a student must progress through their educational program to ensure the student will complete the program within the maximum time frame. A student's pace must be measured at each evaluation. The school calculates a student's pace by dividing the cumulative number of hours the student has completed by the cumulative number of hours the student has attempted or by determining the number of hours the student should have completed when the evaluation is performed.. The school is not required to include remedial courses in the calculation of a student's pace. For transfer students, an institution must consider credits accepted towards the student's program in both the hours earned and hours attempted categories. A school's pace policies should include information such as:

- A description of how a student's pace is calculated
- The pace at which students are expected to progress toward degree completion, including any separate standards used for categories of students (see Section 12.7)
- A statement that a student's pace is measured at each evaluation
- A statement regarding the institution's treatment of remedial courses
- The inclusion of credits accepted towards a transfer student's program in both the hours earned and hours attempted categories

Note: The evaluation of pace is not required for nonterm and subscription-based programs, though maximum timeframe is still applicable to all programs, regardless of structure.

Response:

See Section 2.5 Quantitative Measure

Procedures

Give a detailed description of how a student's pace is calculated and monitored, including information such as:

- A description of the calculation process (e.g., manual or automated)
- How the financial aid office documents a student's pace (e.g., notation is made in the student's file or a code is entered into the student's electronic record)

Response:

See Section 2.5 Quantitative Measure

Resources:

668.34(a)(6)
668.34(a)(5)
ED Program Integrity Q&A—Satisfactory Academic Progress, SAP-Q3/SAP-A3, SAP-Q4/SAP-A4
668.34(a)(5)(ii)
2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024
Federal Register, 9/2/20, p. 54742

12.6 Evaluation Periods

Policies

To ensure the student is making sufficient progress both quantitatively and qualitatively, your SAP policy must provide for regular evaluation. Schools may evaluate SAP as frequently as every payment period, but no less often than annually. The SAP evaluation must coincide with the end of a payment period.

Some schools may have programs which use different evaluation periods for measuring SAP (e.g., students in a certificate program may be evaluated after every payment period, while students in a

Resources:

668.34(a)(3)
2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024

four-year program are evaluated annually). If your school has programs with different frequencies of evaluation, explain that here. You may wish to address each program or group of programs with the same set of standards in separate subsections of this part of your manual.

When describing the evaluation periods include information such as the:

- Length (e.g., payment period or annually)
- Student's minimum pace for making SAP (i.e., the quantitative progress)

Response:

Federal and State regulations require that all financial aid recipients maintain SAP to receive financial aid. In compliance with these regulations, SAP will be checked for all students after every semester, regardless of whether financial aid was received. Progress is evaluated based on all courses taken at MCCD, plus transfer units and upper division units from prior colleges.

Procedures

Define the evaluation period(s) used to check and monitor SAP. Include information such as:

- How evaluation periods are defined for each program (e.g., payment period, annually)
- The number of evaluation periods defined for SAP for each program

Response:

See the procedures in Sections 12.4 Qualitative Measure, 12.5 Quantitative Measure, and 12.5.1 Maximum Timeframe.

12.6.1 Financial Aid Warning

Policies

Schools which evaluate SAP after every payment period may place students who fail to meet either the pace component, the GPA component, or both, on financial aid warning for one payment period. Students on financial aid warning remain eligible to receive Title IV funds. If your school evaluates SAP after each payment period and uses financial aid warnings, explain your policy in detail here, including information such as:

- The length of financial aid warning (i.e., one payment period)
- The condition(s) for being placed on financial aid warning (e.g., a student is automatically put on financial aid warning the first time the student fails to make SAP, or each student is reviewed on a case-by-case basis before being put on financial aid warning, etc.)
- The student's responsibilities during a financial aid warning period (e.g., student must meet SAP standards by the end of the warning period)
- The consequences of failing to meet those responsibilities (e.g., student will be denied future aid until regaining eligibility by meeting the school's Title IV SAP standards)
- Any limits on allowable financial aid warning periods during a student's enrollment

Resources:

668.34(b), Financial aid warning
668.34(a)(8)(i)
668.34(c)(1)
668.34(c)(2)(i)
2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024

Response:

If a student does not maintain a cumulative 2.0 GPA or higher and a 67% completion rate, the student will be placed on warning status. Students who are placed on warning status may continue to receive financial aid for one semester. Students who complete a semester on warning must have their academic progress reviewed before their financial aid eligibility for the following semester is determined.

Procedures

Describe the steps taken to put a student on financial aid warning. For example, if financial aid staff is responsible for recording a code in a computer system, indicate who is responsible and give a detailed description of how this is done. Describe the steps taken to monitor that students meet any required conditions.

Include information on how a student is informed about being placed on financial aid warning (e.g., student is sent a letter explaining this status and the consequences of not making SAP after the next payment period). You may want to cross-reference any correspondence sent to students in the forms

section of the appendix.

Response:

The financial aid office runs the SAP process after every semester on all students. This is run through the Colleague SIS system. That warning status is reflected on the student's financial aid record in Colleague. The financial aid office will then batch post appeals in the CampusLogic/Student Forms platform. Students are notified by an email/text from Student Forms about the need to submit an appeal. It also displays the student's SAP status in Ellucian Self-Service

12.6.2 Financial Aid Probation

Policies

If a student successfully files a SAP appeal, the student will be placed on financial aid probation for one payment period. Students on financial aid probation are eligible for Title IV aid. If the student will require more than one payment period to re-establish eligibility with SAP standards, the student can also be placed on an academic plan. The student will be on financial aid probation during the first payment period of the academic plan. Provide a detailed description of your policy regarding financial aid probation, including information such as:

- The conditions for being placed on probation (e.g., a student is placed on probation for one payment period after successfully appealing a determination they are not making SAP)
- The student's responsibilities during probation [e.g., meet SAP standards at the end of the payment period (or term) or meet the conditions of their academic plan]
- The consequences of failing to meet those responsibilities (e.g., the student will be denied future aid until regaining eligibility by meeting the school's Title IV SAP standards)
- Any limits on allowable probationary periods

Response:

Financial aid probation is a temporary status granted to students who have not met SAP standards but have successfully appealed their SAP status. Students on financial aid probation may continue to receive financial aid for one additional semester.

Students with an approved appeal are considered to be on probation. Students on probation must meet all of the following requirements each semester to maintain financial aid eligibility:

- Be enrolled in and attending an eligible AA/AS/AAT/AST degree, transfer requirement, or certificate program,
- Receive credit for at least 67% of the total units attempted during a regular semester with at least 6 enrolled Academic units (excluding Academic recovery courses and Physical Education courses), and
- Achieve a minimum GPA of 2.0.
- If all classes are taken on a credit/non-credit basis, the GPA requirement will not apply.

Appeals approved for students who have exceeded the maximum timeframe will only be eligible for the specific courses needed for their primary educational goal.

Students who complete a semester on probation must have their academic progress reviewed before their financial aid eligibility for the following semester is determined. If a student meets all requirements for the GPA and completion rate during the probation semester, the probation status will continue for the following semester.

Procedures

Describe the steps taken to put a student on financial aid probation. For example, if financial aid staff is responsible for recording a code in a computer system, indicate who is responsible and give a detailed description of how this is done. Describe the steps taken to monitor that students meet required conditions.

Include information about how a student is informed about being placed on financial aid probation (e.g., student is sent a letter explaining this status and the consequences of not making SAP after the next payment period). You may want to cross-reference any correspondence sent to students in the forms section of the appendix.

Resources:

668.34(a)(8)(ii)
668.34(b), Financial aid probation
668.34(c)(2)(ii)
668.34(c)(4)
668.34(c)(3)
2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024
668.34(d)(2)

Response:

The financial aid technician (FAT) assigned to review SAP appeals reviews the SAP appeals in the CampusLogic/Student Forms platform. If the appeal is approved in Student Forms, it will be updated and the student will be notified of the SAP approval. Then the student's SAP status will be updated in Colleague and placed on a SAP probation status and their financial aid is reinstated for one semester.

12.7 Appeals

Policies

Schools may have an appeal procedure for students who fail to make satisfactory academic progress. In order to approve a student's appeal, the institution must determine the student will be able to meet its SAP standards by the end of the subsequent payment period or develop an academic plan for the student which, if followed, ensures they will be making SAP by a specified point in time. Describe your policy regarding SAP appeals, including information such as:

- Whether or not you allow students to appeal a determination they are not making SAP
- Which SAP standards can be appealed
- How students are informed about the appeal process
- The role of any individual or committee in the appeal process and who makes up the committee
- Whether there is a specific appeal form (You may wish to cross-reference the forms section of the manual.)
- How an appeal is submitted (e.g., school may require all appeals be written, even though this is not a federal requirement)
- The number of times a student can submit an appeal (e.g., whether or not second appeals are considered or under what conditions multiple appeals may be considered)
- The deadline by which an appeal must be received and the time frame by which a student may expect to receive a response to the appeal
- Any terms and conditions associated with approved appeals


Describe examples of mitigating circumstances by which an appeal might be approved so personnel have a general understanding of what these circumstances are (e.g., family member's death, illness, etc.).

Response:

Under certain conditions, students placed on financial aid disqualification may file an appeal for consideration of reinstatement of financial aid eligibility. The following are examples of reasons a student may file an appeal: For all appeals for reinstatement of financial aid, supporting documentation is required.

- Inability to complete their course of study within the maximum timeframe due to a change of academic major (Note: Change in degree objective/major more than once without extraordinary circumstances does not constitute sufficient reason for failing to meet SAP or exceeding the 150% of Academic Program, AA/AS/AAT/AST degree or Certificate).
- Documented serious injury, illness or medical condition requiring a doctor's care
- Death of an immediate family member (copy of death certificate is required)
- Other documented extenuating circumstances that were beyond the student's control

The following are not considered extenuating circumstances beyond a student's control:

- Personal problems not requiring professional intervention
- Poor time management
- Unaware of academic progress policies or other college requirements

Resources:

668.34(a)(9)
668.34(b), Appeal
668.34(a)(10)
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024
668.34(c)(3)(ii), (iii)
2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024
668.34(d)(2)(ii), (iii)
668.42(c)(2)(ii)

- Not following an Academic Counselor's recommendations
- Transportation problems
- Childcare problems

Procedures

Provide details regarding the SAP appeal process from the time the financial aid office receives an appeal until the student is notified of the outcome. Include information about who in the financial aid office is responsible for receiving, reviewing, and making appeal decisions. If there is a committee, describe its membership and role in the appeal process. You may want to cross-reference the professional judgment (PJ) section, Section 10, of the manual.

Include information about how the student is informed of the appeal outcome and who is responsible for making adjustments to the student's record and financial aid offer, if warranted. You may want to cross-reference any correspondence sent to students in the forms section of the appendix.

Response:

To file an appeal for reinstatement of financial aid, the student must submit all the following:

- A completed appeal form through Campus Logic/Student Forms,
- An educational plan from the MCCD counseling office,
- A written statement to the financial aid office indicating the circumstances that prevented the student from making SAP and what has changed to allow the student to make SAP at the next evaluation, and
- Supporting documentation that includes the semesters where there was a lack of progress.

The appeal, along with all documentation, will go to the Appeals Committee which will review all submitted information and make a decision. The Appeals Committee is composed of an administrator, an academic counselor, a financial aid staff member, and a student representative. All decisions made by the Appeals Committee are final. SAP appeal results will be sent to the student via email or through the CampusLogic/Student Forms platform.

12.7.1 Documentation

Policies

Adequate documentation is critical. A student who appeals must submit information explaining why they failed to meet SAP standards and what has changed in the situation which will allow the student to make SAP by the next evaluation. Additionally, since third parties may be used to document the mitigating circumstances surrounding a SAP appeal, give examples of documentation your school will accept to support an appeal. Some examples might include but are not limited to:

Resources:

668.34(a)(9)(iii)
2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024

- Newspaper obituaries or death certificates to substantiate deaths
- Physician's written statement to substantiate illness or accident
- Written statement from clergy, family member, or other third party who knows the student's situation
- Written statement from academic advisor or professor

Response:

It is a requirement that SAP appeals be submitted with the appropriate documentation to further substantiate the student's mitigating circumstances. Examples of documentation that may be requested are listed below:

- Severe illness, medical condition, or injury: Signed & dated letter from a physician on office letterhead; legible copy of accident report.
- Death of a family member: Death certificate and/or obituary.
- Traumatic life-threatening events such as fire or hurricane: Evidence of such an event such as an insurance claim or FEMA application.
- Other circumstances beyond the control of the student (the student must explain in detail the

nature and dates of the unexpected circumstance): Appropriate documentation which will verify the situation.

Procedures

Describe the following procedures:

- How appeals and documentation are tracked and forwarded to the staff (or committee) who reviews appeals
- Action taken if an appeal is received without proper documentation
- Action taken if documentation is submitted without an appeal
- How the financial aid office documents the action taken as a result of an appeal

You may want to cross-reference any correspondence sent to the student in the forms section of the appendix. You may also wish to cross-reference the forms and the document collection and tracking sections of the manual.

Response:

If an appeal is deemed incomplete due to missing information, the appeal will be rejected, and the student must resubmit for review again. When an appeal is rejected, the student is notified and provided with additional details of what must be included in the appeal to be deemed complete. This process is always documented in Campus Logic/Student Forms as well as in their student file.

12.7.2 Academic Plans

Policies

Schools have the option of developing an academic plan for a student who does not meet SAP standards, but successfully files an appeal. While financial aid probation is an option for students who could meet SAP standards at the end of the next payment period, an academic plan is appropriate for a student who would require more time to be in compliance. Academic plans must be developed on a student-by-student basis, and designed in such a way that, if followed, the student will be meeting SAP standards by a specified point in time. The academic plan may specify the student will be evaluated more frequently than other students.

The SAP regulations do not address the development of academic plans. Plans may be as simple as a mathematical calculation specifying the percentage of coursework the student must complete, or as detailed as a course-by-course plan toward degree completion. If your institution uses academic plans as part of its SAP appeals, describe your policy for their use, including information such as:

- Which students will use academic plans (e.g., only first- and second-year students or the decision is made on a case-by-case basis)
- What is included in academic plans (e.g., a course-by-course plan for degree completion or a mathematical calculation specifying the student's new pace)
- The role of financial aid office staff and other institutional staff in developing and monitoring academic plans
- How the institution will monitor students' compliance with their academic plans
- How often the student will be evaluated under their plan

Response:

All students who submit a SAP appeal must first meet with their academic advisor in the counseling office to create an academic plan that will assist the student in reaching good academic standing.

Procedures

Provide details regarding your school's use of academic plans in the SAP appeal process from the point it decides a student should use a plan through the time the student is meeting the school's SAP standards. Include information about how students who could benefit from the use of academic plans are identified. Also describe the process you use to develop plans, including all involved staff. Detail the system you use to monitor student compliance with academic plans.

Include information about how the student is informed of the conditions in the academic plan,

Resources:

Federal Register, 10/29/10, p. 66886
ED Program Integrity Q&A—Satisfactory Academic Progress, ACP-Q1/ACP-A1, ACP-Q3/ACP-A3, ACP-Q4/ACP-A4
668.34(c)(3)(iii)(B)
668.34(d)(2)(iii)(B)
2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024

compliance with the plan, and who is responsible for adjusting the student's record. You may want to cross-reference any correspondence sent to students in the forms section of the manual.

Response:

The academic plan is created on a student-by-student basis. An academic plan will need to be submitted with each SAP appeal until the student is no longer on SAP for quantitative, qualitative, or maximum timeframe disqualification.

12.8 Regaining Eligibility

Policies

A student not making SAP may re-establish eligibility on their own, either because an appeal was denied, the school does not permit appeals, or because the student did not submit an appeal. The institution must define specific procedures for a student to re-establish SAP on their own. It is up to the school to determine when such students are again meeting SAP.

Other than when an appeal is granted, a student can regain eligibility only by taking action that brings them into compliance with the qualitative and quantitative components of your school's academic progress standard. Neither paying for one's classes nor sitting out a semester affects a student's SAP standing, so neither is sufficient to re-establish eligibility.

Describe the standards or criteria by which a student can re-establish eligibility. Include information about the period for which the student will resume receiving aid after re-establishing eligibility.

Response:

Students who are disqualified from receiving financial aid can regain their eligibility by meeting the SAP standards which would be to complete the required 67% of the attempted units and raise the cumulative GPA to at least 2.0 with academic classes, pass one regular semester with at least 6 units (completing all attempted classes with C or better) and be under the maximum timeframe for their program. Students may also remove deficiencies for prior academic years during the summer session without financial aid.

Procedures

Describe how the financial aid office determines a student has re-established Title IV eligibility because they are making acceptable SAP (e.g., the student is responsible for notifying the financial aid office or the registrar notifies the financial aid office, etc.).

Include information about the steps the financial aid office takes to reinstate a student's Title IV aid eligibility.

Response:

Students must notify the financial aid office when this option is used.

Resources:

668.34(a)(9)(i)
668.34(a)(10)
2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024

12.9 Treatment of Nonpunitive Grades, Repeated Courses, Audited Courses, Pass/Fail Courses, Withdrawals, and Incompletes

Policies

Provide the school's definitions of nonpunitive grades, repeated courses, audited courses, pass/fail courses, withdrawals, and incompletes. Cross-reference your policies regarding the definition of a full-time student. Then describe how these courses are treated in the school's SAP policy. (All grades earned in courses that apply towards fulfilling a student's program requirements must be included in SAP calculations.) Include information such as:

- The maximum number of allowable repeated courses, withdrawals, and incompletes (if any)
- Acceptable reasons/conditions for course repetitions, withdrawals, and incompletes (if any)
- A timeframe by which an incomplete course must be completed and the consequences of not meeting that timeframe

Note: Pass/fail coursework counts as attempted for SAP purposes but are not factored into the qualitative component for SAP purposes when there are just a few courses under this grading system. However, a program comprised mostly or completely of pass/fail coursework must be counted in both the qualitative and quantitative components.

Response:

Resources:

668.34(a)(6)
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024
2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024

Federal regulations allow students to receive federal student aid for one repeat of a previously passed course. A grade of D or better is considered passing. W's do not count as repeats. If a student attempts a course for the third time after previously receiving a passing grade in that course, they will no longer be eligible for payment for those units if they previously received Title IV funding for the course.

Procedures

Explain the process used to track and monitor students who have nonpunitive grades, repeated courses, audited courses, pass/fail courses, withdrawals, and incompletes. If another office monitors this process, indicate the name of the office and describe how and who in the financial aid office is notified about these students. You may want to cross-reference any correspondence sent to these students in the forms section of the manual.

Response:

The Ellucian Colleague system removes remedial and ESL courses from the SAP calculation when the financial aid office runs the SAP process.

12.10 Treatment of Remedial, Enrichment, and English as a Second Language Courses

Schools are given latitude in defining the effect of remedial, enrichment, and English as a Second Language (ESL) courses on SAP but are required to address these courses in their policies.

Resources:

668.20
ED Program Integrity Q&A—Satisfactory Academic Progress, SAP-Q3/SAP-A3, SAP-Q4/SAP-A4

Resources:

668.34(a)(5)(ii)
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024

Policies

If your school offers remedial, enrichment, or ESL courses, describe your policies and how these courses impact a student's SAP standing. Remedial courses are required to be included in the qualitative component, although they need not be included in the student's GPA. An institution may calculate a GPA used for SAP purposes that includes the grades from the remedial courses or use another method to determine the qualitative measure for remedial coursework. Remedial courses are not required to be included in the quantitative measurement. You might want to take into account the fact that no more than one year's worth of noncredit or reduced credit remedial coursework may be included in a student's enrollment status or cost of attendance and ESL courses do not count against the one-year limitation. Cross-reference the need analysis and program eligibility sections of your manual that address these issues.

Response:

Remedial Coursework:

If a student receives financial aid for remedial coursework, and completes one year or 30 units, no further aid will be paid for remedial study. The student may continue to enroll in remedial classes, but financial aid payments will be calculated only for degree-applicable coursework.

English as a Second Language (ESL) Coursework:

Students who enroll in excessive ESL coursework (over 45 units) without enrolling in classes leading toward their stated educational major or goal will be notified by the financial aid office and requested to meet with an academic counselor to determine proficiency to enroll in at least one class leading toward the declared major. ESL students will be strongly urged to enroll in coursework that will assist them in completing their educational goal.

ESL and remedial coursework will count toward the 2.0 GPA and 67% completion requirements. However, all ESL and 30 units of remedial coursework will be subtracted in the calculation of the maximum timeframe allowed.

Procedures

Describe the steps taken to monitor remedial, enrichment, and ESL courses, including information such as:

- How the financial aid office receives information about Title IV students enrolled in these classes
- How the financial aid office tracks and monitors students enrolled in these types of courses
- Who in the financial aid office is responsible for monitoring students enrolled in these types of courses
- How students are informed once they reach the maximum limit allowed by your policy, including details about any warnings students may receive before reaching the maximum limits

You may want to cross-reference any correspondence sent to these students in the forms section of the appendix.

Response:

The Ellucian Colleague system removes remedial and ESL courses from the SAP calculation when the financial aid office runs the SAP process.

12.11 Treatment of Consortium, Change of Major, Second Degree, and Second Major Courses

Policies

Courses taken under a written agreement (e.g., a consortium or contractual agreement) must, at a minimum, be included in a student's pace calculation. Otherwise, there are no specific federal requirements regarding students earning credits through a consortium/contractual agreement, students who change their major, or students working on second degrees or second majors; however, you must decide how these students will be treated with regard to the maximum time frame.

Describe your school's policy regarding consortium/contractual hours, major changes, second degrees, and second majors. Include a statement about how the school accounts for all hours attempted (e.g., so that no one group of students has more than the maximum amount of time for degree completion).

Response:

Change of Major & Double Major: If the student completes the degree requirements of both programs simultaneously, the student can receive aid from both programs until completion. The school must calculate SAP separately for students enrolled in two different degree programs, leading to two different degrees. All units will be counted for SAP when changing majors.

Resources:

ED Program Integrity Q&A—Satisfactory Academic Progress, SAP-Q5/SAP-A5
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024

Procedures

Provide a step-by-step description of how student categories are identified (e.g., the registrar notifies the financial aid office of major changes). Include information about who in the financial aid office is responsible for monitoring the SAP of these student categories. You might want to cross-reference any correspondence sent to these students in the forms section of the appendix.

Response:

Once the SAP evaluation has been performed, the financial aid office will need to wait until the next SAP evaluation period to determine if a student is meeting the SAP requirements. Regardless of the major change, all units taken at the institution will be accounted for in the annual SAP calculation.

12.12 Completion of Degree Requirements

Policies

Describe your school's policies regarding degree completion. For example, a student who has completed all the coursework for his or her degree or certificate but has not yet received the degree or certificate cannot receive further financial aid for that program.

Response:

Students who have completed an AA/AS or higher degree will be considered to have exceeded the maximum timeframe and will no longer be able to receive financial aid. Students with a maximum timeframe status can submit an appeal. Appeals approved for students who have exceeded the maximum timeframe will only be eligible for the specific courses needed for their primary educational goal.

Resources:

2024-25 FSA Handbook, Vol. 1, Ch. 1, February 2024

Procedures

Describe how the financial aid office monitors a student's completion of degree or certificate

requirements (e.g., the registrar provides a report of all financial aid recipients who have fulfilled all degree or certificate requirements). You may want to cross-reference any correspondence sent to these students in the forms section of the manual.

Response:

Degree completion is reflected in Ellucian Colleague and will be included in the SAP process that is run after every semester.

12.13 Notices

Policies

Schools are required to publish and make their SAP policy readily available to all current and prospective students. Describe your policy for publishing your school's SAP policy. You may want to cross-reference the process used for the academic progress policy your school uses for all of its students if the policy and/or the process are the same. Include information such as:

- The individual(s) responsible for publishing your school's SAP policy
- How, when, and where the policy is published (i.e., URL on your school's website, catalogue, financial aid brochure, etc.)
- Frequency of review and update of the SAP publication and the individual(s) responsible for these tasks

 You may wish to cross-reference the Student Consumer Information Requirements, Section 5, of the manual.

Response:

The MCCD SAP policy is available from the following sources:

- The Merced College Catalog,
- The Merced College Website, and
- During in-person and online orientations.

The DFA updates the SAP information annually.

Procedures

Describe the method used by your school to make the financial aid office SAP policy readily available to currently enrolled and prospective students. Include information on how and when students are notified of the availability of the SAP policy and the procedures they must follow to obtain a copy of the policy.

Response:

This information is available on the website

https://www.mccd.edu/pay-for-college/financial-aid/financial-aid-policies/

Resources:

668.16(e)
668.42(c)(2)
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024

12.X - Reserved for Institutional Use

This section is reserved for any institution-specific area of policies and procedures not covered in previous sections. It may be necessary to include several sub-sections of institution-specific content within this area. If there is no institutional content, simply leave the area blank, or mark the box Complete as preferred.

Policies

Response:

Assembly Bill 789 requires California institutions to have SAP policies that meet all the following requirements:

- GPA and pace of completion must be set at the minimum federal standards in 34 CFR 668.34(a);
- SAP standards and appeals process must be provided to students during new student orientation and be included (in student-friendly language) on the institution's website, course syllabi, website,

and financial aid award letters. Faculty will also be requested to include student-friendly language on course syllabi regarding the standards and appeal process;

- Students must be notified when the student has not met SAP standards following every term of enrollment;
- GPA and pace of completion standards can only be based on cumulative measures (not individual terms);
- Remedial coursework must be excluded from maximum timeframe calculations if the institution offers remedial coursework;
- Students who fulfill the terms and conditions of the student's academic plan must be allowed to remain on financial aid probation as defined by Section 668.34(b) of Title 34 of the Code of Federal Regulations, including continuing to receive financial aid for any term for which the student fulfills the terms and conditions of the student's academic plan.
- In the case of a satisfactory academic progress determination for a transfer student, when calculating maximum timeframe as defined by Section 668.34(b) of Title 34 of the Code of Federal Regulations, only include those credits from other institutions that count towards the student's current program of study.
- Accept both electronic and hard copy financial aid appeals for any student who is ineligible to receive financial aid due to the determination that the student did not meet "satisfactory academic progress," as defined by the institution where the student is enrolled, subject to all of the following:
  - A student who loses financial aid eligibility may appeal the determination during any subsequent term following loss of financial aid eligibility. The institution shall not limit the total number of appeals that may be submitted by a student throughout the duration of the student's enrollment. The institution may limit the number of appeals per term, but each appeal that is denied shall be subject to the second review process pursuant to clause (vi). The institution shall not impose deadlines for submitting an appeal that is earlier than three weeks before the end of each term.
  - A student who previously disenrolled while being ineligible to receive financial aid may appeal the loss of financial aid upon reenrollment, and the timing for consideration of the appeal shall allow the student, if the student meets the criteria for financial aid reinstatement, to qualify for reinstatement upon the first term of reenrollment.
  - The institution shall provide a student who is ineligible to receive financial aid with written notice of the financial aid appeals process, including the process for a student to file an appeal, information about the second review process for an appeal that is denied as described in clause (vi), and how a student may request a second review.

In reviewing a student's appeal, the institution may consider any additional special circumstances that the institution deems appropriate, and shall consider a broad range of special circumstances, including, but not limited to, any of the following:

- Death of a relative or other significant person.
- Injury or illness, including, but not limited to, behavioral health conditions, of the student or a relative or other significant person.
- Pregnancy or birth of a child.
- Homelessness.
- Loss of childcare.
- Loss or change in employment.
- Loss of access to personal or public transportation.
- Being a victim of a serious crime, including, but not limited to, domestic abuse, even if the crime was not reported or did not result in criminal prosecution or civil liability.
- Natural disaster.
- Change of majors.
  - The institution shall review a student's appeal and notify the student of the appeal decision within 45 days of submission of a complete appeal. The institution shall not disenroll a student for

nonpayment of tuition and fees while the student's appeal is pending.

- The institution shall provide a second review process for an appeal that is denied if requested by the student. The second review shall be conducted by a reviewer who did not participate in the first review.
- The institution shall waive any requirement for third-party written documentation of the special circumstances forming the basis of an appeal if that documentation cannot be reasonably obtained by the student and the student signs a statement attesting to the veracity of the special circumstances presented as the grounds for appeal. This subparagraph shall not be interpreted to require institutions to provide retroactive financial aid for a term preceding the term in which a student re-enrolls.

Procedures

Response:

MCCD currently follows all the practices listed above. All practices are considered when reviewing a student's appeal.

Section 13: Return of Title IV Funds

13.1 Process Overview and Applicability

The return of Title IV funds (R2T4) requirement is a complex process involving a great deal of interoffice cooperation and coordination. Flowcharts of the processes at your institution could be very helpful visual aids. A flowchart provides an overview of the major steps in the overall process and the offices that have responsibilities for those steps, indicates the order in which those steps need to be taken, helps to identify bottlenecks in the process, and points out where communication is needed between offices. The flowchart can also show if/then decision points and conditional branching.

Your flowchart might, for example, show:

- Which office or offices are designated as contact points for students who wish to withdraw
- How the contact office communicates that information to other affected offices
- Who determines the withdrawal date for R2T4 purposes and reports it to other institutional offices, to the National Student Loan Data System (NSLDS), and/or other agencies
- Who calculates the return of Title IV funds
- Who is responsible for ensuring the proper amounts are returned to the appropriate Title IV programs in a timely manner
- Who will notify the student of his or her obligation to repay funds, who tracks the repayment, whether a repayment agreement will be offered and monitored by the institution, as well as the timing and responsibility for referring overpayments to the U.S. Department of Education (ED)
- Acceptable methods of payment for repaying funds under an agreement with the institution (e.g., cash, personal check, cashier's check, credit card, debit card, money order)
- Holds that will be placed on the student's school records or account, and who is authorized to release them once the student's obligation has been satisfied
- Who will record the student's obligation to repay a Title IV overpayment in NSLDS
- Who offers the student any earned post-withdrawal disbursement (PWD), when responses are due, and how responses (or lack thereof) are handled
- How long each step in the process may be allowed to take, considering the regulated timeframes

In addition to, or in place of, a flowchart, you may wish to outline the overall process as a series of steps, again showing responsibilities for each and perhaps cross-references to your flowchart, appropriate subsections of your manual, or the policies and procedures of other responsible offices. For example, you might divide the process as follows:



***Step 1*:** Determine if the student is not considered to have withdrawn for the payment period or period of enrollment because the institution has opted to:

- treat the student as never attended courses;
- refund all institutional charges;
- returns all Title IV grants and loans (including Title IV credit balances delivered to the student or parent; and
- write off any unpaid balances due to the return of disbursed Title IV funds

Step 2: If the student is considered to have withdrawn from the payment period or period of enrollment, determine if the student is eligible for an R2T4 exemption

***Step 3*:** Determine the student's withdrawal date, if the student is not eligible for an R2T4 exemption

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

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

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

Resources:

668.22(a)(6)(ii)(B)(1)
668.22(a)(6)(iii)
668.22(j)
668.22(a)(2)
668.22(i)
668.22(a)(6)
668.22(a)(6)(ii)(A)(2)
668.22(a)(2)(ii)
668.22(a)(6)(ii)(B)(2)
668.22(a)(2)(ii)(A)(6)
668.22(a)(2)(ii)(A)(6)(i)
668.22(l)(9)
668.22(a)(2)(ii)(A)(6)(iii)
668.22(a)(2)(ii)(A)(6)(ii)
668.22(a)(2)(ii)(A)(6)(iv)
668.22(b)
668.22(c)
668.22(e)(2)
668.22(e)
668.22(e)(3)
668.22(e)(4)
668.22(g)(1)
668.22(h)
668.164(j)(3)(i)
668.22(a)(6)(ii)(A)(1)

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

***Step 8*:** Allocate unearned aid

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

If disbursed aid exceeds earned aid:

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

If earned aid exceeds disbursed aid:

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

Cross-reference subsection 13.4—Post-Withdrawal Disbursements.

Response:

The Higher Education Act of 1965 (HEA) requires institutions to perform a Return of Title IV Funds (R2T4) calculation when a recipient of Title IV funds ceases to be enrolled (complete withdrawal) prior to the end of a semester. These requirements do not apply to a student who does not actually begin attendance in a semester at the Merced Community College District (MCCD).

Title IV funds are offered to a student under the assumption that the student will attend school for the entire period for which the assistance is offered. When a student withdraws, the student may no longer be eligible for the full amount of Title IV funds that the student was originally scheduled to receive. If a recipient of a Title IV grant or loan funds withdraws from MCCD after beginning attendance, the financial aid office must perform an R2T4 calculation to determine the amount of Title IV assistance earned by the student. If the amount disbursed to the student is greater than the amount the student earned, the unearned funds will be returned. If the amount disbursed to the student is less than the amount the student earned and for which the student is otherwise eligible, he or she is eligible to receive a post-withdrawal disbursement (PWD) of the earned aid that was not received.

Policies

Before writing a policy and implementing procedures for the R2T4, it is necessary to understand the principles and conditions that dictate when a school must perform an R2T4 funds calculation. For example, typically only students who do not complete the days in the payment period or period of enrollment they are scheduled to complete are subject to the R2T4 formula. However, there are certain circumstances when a student may qualify for an R2T4 exemption, completing only a portion of the payment period or period of enrollment they are scheduled to complete. Additionally, some students who have dropped other classes are treated as having changed enrollment status rather than as having completely withdrawn; others are considered to have completely withdrawn from school under the R2T4 requirements. You may want to review the resources listed in the column to the left, then compose a policy that defines students for whom the R2T4 calculation is required. You might want to include:

- A list of situations that would not require your school to perform an R2T4 calculation, including but not limited to a student who was offered Federal Work-Study (FWS) only; who is treated as if they

Resources:

Federal Register 11/1/1999, pp. 59016 to 59044
668.22(l)(2)
2024-25 FSA Handbook, Vol. 5, Ch. 1, May 2024
668.22(l)(3)
Federal Register, 9/2/20, pp. 54742 to 54818
668.22(l)(9)
Federal Register, 1/24/24, p. 4555
668.22(l)(6)
GEN-04-12

never attended courses, all institutional charges are waived, and all Title IV funds that were disbursed are returned to the respective Title IV programs; who qualifies for an R2T4 exemption; who dropped classes but did not completely withdraw; who never began attendance in any classes; or for whom the institution cannot document at least one day of class attendance; etc.

- The difference between a withdrawal and a change in enrollment status for R2T4 purposes for courses offered in modules or mini-terms (if your school offers these types of courses)
- The difference between an R2T4 calculation change and a correction, including any applicable requirements and deadlines. For example, an R2T4 calculation change occurs if the school is able to update information for the R2T4 calculation within the R2T4 deadline. A correction occurs when a mistake was made in the R2T4 calculation.
- A list of Title IV programs to which the R2T4 requirements apply
- The conditions under which a student qualifies for an R2T4 exemption
- The use of an optional, fixed point in the payment period or period of enrollment or R2T4 freeze date to determine the number of days a student enrolled in modules is scheduled to complete that is used in the denominator of the R2T4 calculation
-  Cross-references to the relevant consumer information sections of the manual

Other policies relating to the overall process as well as interoffice and intra-office communications will be laid out by your flowchart, but should be formulated as formal written statements with corresponding procedures.

Be sure to define relevant terms and principles for this section, such as:

- Title IV grant or loan recipient
- Period of enrollment and payment period
- Institutional charges
- Title IV disbursement
- Title IV leave of absence (LOA), if applicable,
- The date of the institution's determination that a student withdrew
- What constitutes academic engagement
- Programs offered in modules and determination of the number of days a student is scheduled to complete
- Re-entry or transfer into a nonterm credit-hour or clock-hour program within and after 180 days
- R2T4 exemptions include:

    a. Completing program graduation requirements

    b. Successful completion, including what is considered successful completion, of one or more modules, equaling 49 percent or more of the countable days in the payment period or period of enrollment the student was expected to complete

    c. Successful completion of coursework, including what is considered successful completion of coursework (e.g., non-failing or incomplete grades), in one or more modules equal to what the school considers to be half-time enrollment

    d. Providing written confirmation at the time of withdrawal that the student will resume studies within the timeframe specified in the regulations according to the student's program type

If any of the above terms have been defined in another subsection, you may want to include a cross-reference there to avoid duplication.

Response:

If a student ceases attendance (drops or withdraws) from all Title IV eligible courses in a semester, the student must be considered a withdrawal for Title IV purposes. If the student never actually begins attendance for the semester, the R2T4 regulations do not apply. If a student begins

668.22(g)(3)
2024-25 FSA Handbook, Vol. 5, Ch. 2, Pt. 1, May 2024
GEN-11-14
668.22(a)(1)
668.22(a)(2)
GEN-04-03
2024-25 FSA Handbook, Vol. 2, Ch. 4, August 2024
668.22(a)(2)(ii)
GEN-00-24
668.22(a)(2)(iii)
668.4
668.22(a)(3)
600.2, Academic engagement
668.22(g)(1)(ii)
668.22(g)(2)
668.22(l)(4)
668.22(d)(1)
668.164(j)(2)
Federal Register, 1/3/25, pp. 470 to 504
668.164(a)
2024-25 FSA Handbook, Vol. 2, Ch. 2, August 2024
668.22(l)(7)
668.22(l)(8)
668.4(f),(g)
668.22(a)(2)(iii)(B)

attendance but has not been disbursed Title IV aid prior to the withdrawal, the student is not considered to have been a Title IV recipient and the R2T4 regulations do not apply. In these cases, Title IV funds would be handled in accordance with regulations for returning funds for students who do not register or fail to begin attendance.

Whenever the MCCD determines that a student has withdrawn, the student is no longer considered to be enrolled and in attendance. Therefore, the student is no longer eligible for in-school status or an in-school deferment on their federal loans. The MCCD must report the student as withdrawn in the National Student Loan Data System (NSLDS) Enrollment Reporting.

The MCCD's R2T4 policy applies to all registered students receiving financial aid assistance. Students are considered recipients of Title IV federal financial aid if they are eligible to receive or have received funds from one or more of the following programs for the semester:

- Federal Pell Grant
- Federal Supplemental Educational Opportunity Grant (FSEOG)
- Federal Direct Loans
- Subsidized
- Unsubsidized

If a student is a FWS employee, they are no longer eligible to receive FWS payments effective immediately when they withdraw from the semester. Students who were offered only FWS do not require an R2T4 calculation upon withdrawal.

For the purposes of a student withdrawal, the following definitions apply.

- Title IV grant or loan recipient: A student who has been awarded Pell or FSEOG funds or an individual that has been awarded and accepted Federal Direct Subsidized or Unsubsidized loans. If the student has not accepted all or a portion of the loan offer, then the MCCD does not consider that individual eligible for consideration of a PWD. In addition, if the student accepts the loan and it has been originated but has not completed the master promissory note (MPN), this must be completed by the student before the R2T4 calculation is performed.
- Period of enrollment and payment period: When determining how to process the R2T4 calculation, a school must decide to utilize either the period of enrollment or payment period. The MCCD is a standard term school and uses the payment period when completing the R2T4 calculation. The payment period is the period for which the aid is given.
- Institutional charges: These are charges billed by the MCCD and contracted by the student. All students will have tuition and fees.
- Title IV disbursement: Title IV aid (Pell, FSEOG, Subsidized and Unsubsidized Loans) that were disbursed to the student's account to cover institutional charges with any excess being refunded directly to the student.
- Title IV Leave of Absence (LOA): The MCCD does not have an official Title IV approved LOA policy.
- The date the institution determines the student withdrew: The date that the student initiates the withdrawal process is the withdrawal date. For unofficial withdrawals, the last day the student was physically present or participated in an academically related event for the course, as recorded by the instructor. The registrar's office will notify the financial aid office of the student's official or unofficial withdrawal date.
- Academic engagement: Active participation by a student in an instruction activity related to the course of study is required.
- Modules: A course that does not span the entire length of the term. The MCCD does not have any programs offered in modules.

Non-Title IV programs (such as scholarships, State of California grants, and state university grants) are not part of the R2T4 calculation; however, they may be subject to a reduction in cases of withdrawal based on institutional policy. State aid programs cannot exceed tuition fee charges and will be reduced accordingly to avoid an over award.

Students who complete all graduation requirements for the program before completing the number of days or hours in the scheduled period are not considered withdrawn.

Once the financial aid office is notified that the student withdrew, the R2T4 calculation is completed to determine the amount of Title IV aid the student earned. If there is an amount of Title IV aid that needs to be returned, the financial aid office has 45 days to return any unearned Title IV funds to the appropriate Title IV program. If the amount of earned aid is more than the disbursed amount, a PWD will be made. The financial aid office is required to automatically disburse any earned grant funds in a PWD within 30 days after the school determined the student withdrew. Federal Direct Loans require that a student respond to a PWD within 15 days to qualify for the disbursement of loans. The 15 days is the maximum timeframe and cannot be extended. The school has 180 days to disburse loans from the student's official withdrawal date. The financial aid office is required to notify a student of their exit counseling requirement within 30 days of the school determining the student has officially withdrawn.

Some students may be selected for verification by the Department of Education (ED). Verification documents need to be submitted and reviewed before any Title IV aid can be disbursed. If a student selected for verification withdraws before their aid disburses, this aid would be treated like a PWD. An initial calculation is done using the student's official withdrawal date, and any federal grants awarded at the time the student withdrew. A PWD would be made only using federal grant Title IV aid. The student has 120 days from the date the student withdrew or 120 days from the end of the semester, whichever is sooner, to submit verification documents to be considered for any need-based aid. Once the documents are reviewed, another PWD offer will be sent, including the federal grant aid if the verification documents are submitted within the given timeframe. Federal grants will be disbursed automatically within 30 days of determination. The Pell Grant must be disbursed within 120 days from the official withdrawal date.

The MCCD utilizes a census date for both full-term semesters and for programs that do not span a full term. The census date is used for recalculating the Pell Grant based upon the actual enrollment status.

Procedures

Your procedures will need to describe how withdrawn students are identified, both for official and unofficial withdrawals. Include the treatment of students who qualify for an R2T4 exemption, who receive all failing grades, and identify who is responsible for making these determinations.

Other necessary procedures for this subsection might include how communication among offices is achieved, such as liaison designations for each office. Timing requirements should also be addressed, including all of the actions that must occur within specified timeframes from the point of the institution’s determination that a given student has withdrawn. The school should explain who is responsible for monitoring students who do not return as they indicated within their program's regulated timeframe so an R2T4 calculation can be performed.

You will also need procedures for communicating information about the withdrawal process to students such as the office or offices to which a student reports the intent to withdraw and how the student begins the withdrawal process. You may wish to cross-reference the consumer information section of the manual.

Response:

Official withdrawals:

- The student submits the appropriate withdrawal form to the registrar.
- The admission and records office will notify the financial aid office of all financial aid student withdrawals prior to the 60% date. The financial aid technician will request a withdrawal query configured from the Ellucian Colleague system on a regular basis to complete the Return of Title IV (R2T4) funds within the required timeline.

Unofficial withdrawals:

An unofficial withdrawal is identified at the end of the semester and after grades are officially posted, an audit is run to identify those students who did not earn a passing grade. For students that earn an FW grade, the financial aid office will reach out to the faculty to confirm the last date of attendance

Resources:

GEN-04-12
GEN-04-03
2024-25 FSA Handbook, Vol. 5, Ch. 2, Pt. 1, May 2024
668.22(a)(2)(ii)(A)(3)-(5)
668.22(a)(2)(ii)(C)

and academic activity. If there is no response from the faculty, then the 50% midpoint is used as the unofficial withdrawal date. If the student receives a combination of W, Incomplete (I), and/or FW grades, the financial aid office reviews and determines if the student is considered withdrawn for Title IV purposes.

Once the student's R2T4 eligibility has been met, the financial aid technician will perform and complete the R2T4 calculation to determine the amount of federal financial aid the student earned. The financial aid coordinator will return the funds to the federal programs, in the order required according to federal regulations, on the student's behalf.

Order of return of Title IV funds:

- Unsubsidized Direct Loans (other than Direct PLUS Loans)
- Subsidized Direct Loans
- Federal Pell Grants for which a return of Title IV funds is required
- FSEOG for which a return of Title IV funds is required

An email notification is sent to the student's school email address indicating the outcome of the R2T4 calculation including additional information regarding repayment. The student fees office will handle any owing balance that the student is responsible for due to any R2T4 calculation

13.2 Withdrawal Date

Indicate your policies and procedures on the determination of the withdrawal date. If this determination is the purview of another office, you should cross-reference that office's policies and procedures manual, or reproduce those policies and procedures here along with periodic review and update procedures. If the formulation of these policies and procedures is a joint undertaking in which the financial aid office participates, you should document that process here.

Policies

The regulations specify whether your institution is required to take attendance for Title IV purposes. This determination dictates what you must address in your policies. As such, your policies need to include:

- The definition of the institution's withdrawal date (including official and unofficial withdrawals and for programs offered in modules), the definition of the date of the institution's determination that a student withdrew (for an institution not required to take attendance), and the use (if any) of documented last dates of academic engagement or attendance in academically-related activities
- Who determines the withdrawal date for a student and the timing of determining the withdrawal date
- What happens if the student fails to earn a passing grade in at least one course
- Whether a student is allowed to rescind his or her withdrawal notification, and what happens if the student subsequently ceases attendance
- The determination of a withdrawal date for R2T4 purposes for those students who, because of extenuating circumstances, are unable to officially withdraw
- Whether your school is required to take attendance for Title IV purposes because some outside entity, such as an accrediting or state agency, requires the school to monitor attendance for segments of your student population
- If the student provided written confirmation of his or her return within the regulated timeframe according to program type (e.g., standard, nonstandard, nonterm, or subscription-based), and R2T4 calculation requirements if the student changes his or her return date or does not return as scheduled
- Whether your school has a Title IV-approved LOA policy, how that policy affects the determination of whether a student has withdrawn, and the offices that are responsible for various aspects of the LOA process

Definitions relevant to this subsection might include:

- The date of the institution's determination that a student withdrew (for an institution not required to

Resources:

668.22(b)
668.22(c)
2024-25 FSA Handbook, Vol. 5, Ch. 1, May 2024
668.22(l)(3)
668.22(l)(9)
Federal Register, 1/24/24, p. 4555
668.22(l)(6)
GEN-04-12
668.22(l)(7)
2024-25 FSA Handbook, Vol. 5, Ch. 2, Pt. 1, May 2024
GEN-11-14
GEN-04-03
668.22(c)(2)(i)
600.2, Academic engagement
668.22(c)(1)(iv)
668.22(b)(3)(i)(A)
668.22(a)(2)(ii)(A)(3)-(5)
668.22(a)(2)(ii)(B)
668.22(a)(2)(ii)(C)
668.22(d)
668.22(c)(5)

take attendance)

- Academic engagement and attendance at academically-related activities (e.g., exams, assignments, etc.)
- The beginning of the institution's withdrawal process and official notification to the institution
- Programs offered in modules

If any of the above terms have been defined in another subsection, you may want to include a cross-reference there to avoid duplication.

Response:

The MCCD is a school that is not required to take attendance.

Withdrawal Date:

If the student withdraws from all courses by the deadline date listed on the website, the final course withdrawal date is considered the student's withdrawal date, or LDA. Within the federal R2T4 calculation formula, the LDA determines the amount of federal aid earned by the student for a given semester.

Unofficial Withdrawal:

Students who fail to notify the MCCD of their intent to withdraw before the end of the semester and subsequently receive FW grades for all their enrolled courses in a semester are considered unofficially withdrawn. Federal regulations require that the MCCD complete an R2T4 calculation for unofficial withdrawals using a withdrawal date based upon the date the faculty member indicates or, if there is no response from the faculty member, at the midpoint of the semester.

If the original R2T4 calculation is performed and a student's grade(s) changes from an unofficial withdrawal (FW) to an official withdrawal (W), the MCCD is not required to update the R2T4 calculation, as it was correct at the time it was processed. Per the Federal Student Aid (FSA) Handbook: "A change is not a correction if a calculation (R2T4 or PWD) was correct at the time it was processed. An institution is never required to do a recalculation of a change that is not a correction."

Procedures

Describe how your school determines a Title IV recipient's withdrawal date. Include information about who is responsible for this determination and how this information reaches the financial aid office. All required time frames should be delineated as well.

Procedures for this subsection should clearly explain:

- How the school determines and documents withdrawal dates under the various circumstances identified by your policies
- How a student rescinds his or her withdrawal notification
- Actions taken when a student rescinds his or her withdrawal notification, and how the continued attendance of that student is monitored
- Interoffice communications
- Documentation of academic engagement and attendance in academically-related activities, as applicable, and who is permitted to certify it

If information regarding a leave of absence (LOA) is not included here, you may wish to cross-reference other subsections of your manual that describe the effect of a LOA on a student's Title IV eligibility, and/or the policies and procedures of other offices that describe the institution's LOA policy, how that policy is communicated to each student, and how a student granted a LOA is tracked.

Response:

Title IV funds are awarded to a student under the assumption that the student will attend school for the entire period for which financial aid is awarded. When a student withdraws from all classes, the financial aid award amount for the student is affected. When a student receives a combination of

FW's, NC's, I's or all F's, we must treat it as if the student dropped all classes.

According to Federal Student Aid regulations:

- When a student fails to begin attendance in all classes but receives financial aid, the entire amount must be returned. The student is considered a "no show". The institution will return all federal funds disbursed to the student back to the Department of Education, and the student will be billed for the amount returned.
- When a student withdraws before completing more than 60% of the term, the student may no longer be eligible for the full amount of Title IV funds that the student was originally scheduled to receive. The financial aid office will perform a return of funds calculation to determine how much the institution and/or the student must return.
- When a student withdraws after completing more than 60% of the term, the student will not owe any repayment to the institution or the Department of Education. The student will have earned 100% of the financial aid. When a student withdraws and the return of Title IV funds calculation performed indicates that a student has not received all financial aid entitled to, it is called a post-withdrawal disbursement (PWD).

13.3 R2T4 Formula Calculation

Policies

Your policies should describe:

- Who performs the R2T4 calculation and the method used, such as manual paper worksheets, spreadsheets, or software. (If worksheets are used, you may want to cross-reference them in the forms section of the Appendix.)



Note: ED includes the R2T4 funds worksheets in the *FSA Handbook,* Vol. 5, Appendix. ED has a Web-based application that can be used to calculate earned and unearned aid. The application is available via the Common Origination and Disbursement (COD) website.

- What triggers an R2T4 calculation, including any necessary interoffice communication
- The use of payment period versus period of enrollment, if applicable
- Determination of the scheduled number of days to use for the denominator when a student is only enrolled in modules
- The proration of institutional charges if the student is charged for more than one payment period at a time
- The treatment of disbursements that were pending due to verification and interim disbursements for a student who withdrew prior to completing verification, if applicable (cross-referencing your verification and/or disbursement policies as necessary)

You may want to include the following definitions in this subsection:

- Period of enrollment and payment period
- Institutional charges (provide examples)
- Noninstitutional charges (provide examples)
- Title IV aid that could have been disbursed (provide examples)

> *Note: The amount of Federal Supplemental Educational Opportunity Grant (FSEOG) included in the calculation depends upon the matching method the school uses. For example, if the individual recipient or aggregate method is used, 75 percent of the student's grant is used in the calculation because 75 percent of the amount is from federal funds. When using the funds specific match, 100 percent of the funds are considered federal, so one hundred percent of the grant is used in the calculation.*

If any of the above terms have been defined in another subsection, you may want to include a cross-reference there to avoid duplication.

Resources:

2024-25 FSA Handbook, Vol. 5, Appendix, Return of Title IV Aid Worksheets, May 2024
668.22(e)(5)
668.22(l)(2)
2024-25 FSA Handbook, Vol. 5, Ch. 1, May 2024
668.22(l)(9)
GEN-04-12
668.22(g)(3)
2024-25 FSA Handbook, Vol. 5, Ch. 2, Pt. 1, May 2024
668.58(a)(2)(i)(B)
668.58(b)(1)(i)
GEN-04-03
GEN-00-24
668.4
668.22(g)(1)(ii)
668.22(g)(2)
668.22(l)(1)
676.21
668.164(j)(3)

Response:

The MCCD utilizes the Ellucian Colleague system to complete the R2T4 calculations. The outline below illustrates how the amount of Title IV aid earned by the student is determined:

Calculate the percentage of the semester completed by the student:
Days Completed ÷ Days in Semester = Percentage Completed

- If the calculated percentage exceeds 60 percent, then the student has earned the full amount of Title IV aid for the semester.

Apply the percentage completed to the student's Title IV eligibility (as of the withdrawal date):
Total Aid Eligible x Percentage Completed = Earned Aid

Determine the amount of unearned aid to be returned to the appropriate Title IV aid program:
Total Disbursed Aid - Earned Aid = Unearned Aid

See Section 13.1: Process Overview and Applicability

Procedures

Explain how the fact that a student has withdrawn is conveyed to the office responsible for the R2T4 calculation and how the data used to perform the R2T4 calculation is derived. For example, explain how:

- The period of time the student was enrolled is determined
- The person doing the R2T4 calculation knows the amount of Title IV aid disbursed and Title IV aid that could have been disbursed
- Institutional charges are determined; etc.
- Disbursements pending because of verification and interim disbursements made to a student who withdrew prior to completing verification are treated, if applicable (cross-referencing your verification and/or disbursement procedures as necessary)

State how each R2T4 calculation is documented and maintained (e.g., a copy of the worksheet is placed in the student's file, in the electronic record generated by an automated R2T4 calculation, in ED's return of Title IV funds software database, etc.).

Response:

See Section 13.1: Process Overview and Applicability

13.4 Post-Withdrawal Disbursements

Policies

Provide a brief definition of a post-withdrawal disbursement (PWD) and describe the circumstances under which a PWD must be made. Indicate who is responsible for notifying the student or parent of the availability of post-withdrawal disbursements, and who will track the notification and authorization to make the disbursement. Include the time frame by which the school must make the offer and receive the response, and the consequences of a student or parent not responding to a PWD notification.

Resources:

668.22(a)(5)
668.22(a)(6)
668.164(j)
Federal Register, 1/24/24 pp. 4554 to 4555
GEN-04-03
GEN-04-12
2024-25 FSA Handbook, Vol. 5, Ch. 2, Pt. 1, May 2024

Response:

If the calculation produces a credit to the student's account (when the amount of aid earned is greater than the amount that has been disbursed to the student's account), any grant funds will be applied to the account without notification. However, if Federal Direct Loan funds are eligible to disburse under these conditions, the borrower will be notified via email informing them of their eligibility, and the borrower must confirm in writing that they want the loan to be disbursed. If no confirmation is received by the financial aid office within 30 days of the email sent date, the loan offer will be cancelled.

Procedures

Describe:

Resources:

668.22(a)(6)(iii)(A)

- How a student or parent PLUS borrower is notified of eligibility for a PWD and within what time

frame

- How the PWD notification and authorization is tracked
- How the student's or parent PLUS borrower's response is handled
- The priorities for disbursement (e.g., from grants first, paid to outstanding institutional charges before being paid directly to student, etc.)
- Timelines for making the PWD disbursement

Include any copies of correspondence sent to the student and/or parent in the forms section of the Appendix.

Response:

Students who qualify for a PWD must meet the following:

- Completed financial aid file (verification and all tracking requirements satisfied) and met all eligibility requirements.
- If the total amount of the Title IV aid earned as of the withdrawal date is more than the amount that was disbursed to the student (e.g. in the case where a student withdraws prior to the first disbursement date of the term).
- Grants from a PWD may be credited to the student's school account without obtaining student permission.
- Federal Direct Loans from PWD must be obtained as a confirmation from the student before making any disbursement of loan funds within 14 calendar days after receipt of the email notification.

13.5 Returning Unearned Funds

Policies

Describe the determination of the institutional and student shares of unearned aid, and the order of returning those funds to the appropriate Title IV program.

Resources:

668.22(g)-(i)
2024-25 FSA Handbook, Vol. 5, Ch. 2, Pt. 2, May 2024

Response:

The financial aid office will follow federal regulations to determine the proportions of aid disbursed that must be returned by the institution and by the student. However, the MCCD will return the entire amount of federal aid that was not earned by the student to the federal government. If the R2T4 calculation results in a credit balance on the student's account, that credit balance must be disbursed as soon as possible and no later than 14 days after the calculation of the R2T4. The student is required to pay any balance owed back to the MCCD.

Order of Return defined by Federal Regulations:

- Unsubsidized Federal Direct Loans
- Subsidized Federal Direct Loans
- Federal Pell Grants
- FSEOG

Procedures

When describing your procedures, include information such as:

Resources:

668.22(j)
668.22(h)(4)(ii)
668.22(h)(4)(iv)

- How students are notified if they owe a Title IV grant overpayment
- What office is responsible for returning any unearned funds

List the timelines and conditions for:

- Returning the school's portion of unearned funds
- Notifying a student of any Title IV grant overpayment owed
- Reporting any overpayment to NSLDS if the student has neither repaid it nor made satisfactory repayment arrangements to repay it

Include any copies of correspondence sent to the student and/or parents in the forms section of the Appendix.

Response:

Institutional responsibilities are as follows:

- The MCCD determines first and is the lesser of the total amount of unearned aid or an amount equal to institutional charges multiplied by the percentage unearned. The percentage unearned is the complement of the percentage earned.
- To identify students affected by this policy and complete the Return of Title IV Funds (R2T4) calculation.
- To inform the student of the result of the R2T4 calculation and any balance owed to the MCCD because of a required return of funds.
- To return any unearned Title IV aid that is due to the Title IV programs and, if applicable, notifying the borrower's holder of federal loan funds of the student's withdrawal date. The return of unearned Title IV funds has to be done within 45 days of the date of determination (DOD).
- To notify student loan borrowers of eligibility for a PWD, if applicable.

Student's responsibilities are as follows:

- Becoming familiar with the R2T4 policy and how withdrawing from all courses affects eligibility for Title IV aid.
- Notifying the official MCCD representative of intent to withdraw prior to ceasing enrollment.
- Resolving any outstanding balance owed to MCCD resulting from a required return of unearned Title IV aid.
- Resolving any repayment to ED because of an overpayment of Title IV grant funds.

13.5.1 Overpayment Resolution

Policies

State whether the institution will return funds on behalf of a student who owes an overpayment and consider the returned funds as the student's debt to the institution. If so, indicate the circumstances under which this is done. State whether the institution will enter into a repayment agreement with the student. Describe the consequences of owing an overpayment on the student's eligibility for future Title IV aid, as well as any ramifications concerning institutional services

Resources:

GEN-06-05
GEN-17-08
2024-25 FSA Handbook, Vol. 5, Ch. 2, Pt. 2, May 2024

Response:

The MCCD will return the funds on the student's behalf, which will create an owing balance to the school. The student should contact the student fees office to determine the amount that they will be charged for the time they were enrolled. Students are responsible for repaying the MCCD for any remaining balance owed because of funds returned due to the R2T4 calculation.

Procedures

When describing your procedures for resolving overpayments, include information such as:

Resources:

2024-25 FSA Handbook, Vol. 5, Ch. 2, Pt. 2, May 2024

- How repayment agreements (if any) are executed and tracked, including timelines
- Who is responsible for completing an Overpayment Referral form if the school reports overpayments to ED Debt Resolution Services, giving a step-by-step description of this process (cross-referencing the Overpayment Referral form in the forms section of the Appendix)
- A description of an Overpayment Referral form, including information about who uses the form as well as when and why it is used



Note: ED provides information on the required data and format for reporting overpayments on its website.

- Information about why and when a student will be reported to NSLDS, outlining the procedures for

doing so, and who is responsible for this process

- How student eligibility for future Title IV aid or services from the school is monitored if the student re-enrolls

Include any copies of correspondence sent to the student and/or parent in the forms section of the Appendix.

Response:

Repayment arrangements/agreements are handled by the student fees office.

13.X - Reserved for Institutional Use

This section is reserved for any institution-specific area of policies and procedures not covered in previous sections. It may be necessary to include several sub-sections of institution-specific content within this area. If there is no institutional content, simply leave the area blank, or mark the box Complete as preferred.

Section 14: Institutional Refunds

14 Institutional Refunds

Resources:

2024-25 FSA Handbook, Vol. 5, Ch. 1, May 2024

An institutional refund represents the amount and type of an institutional charge that is returned to a student because of the student's withdrawal from one or more courses, or because of a complete withdrawal from the institution. An institution's refund policy sets the amount to be returned to the student, which is typically based on one or more of the following factors: the date of the withdrawal, the percentage of the term or hours completed, the number of credits or hours from which the student withdrew, or the usage of facilities or supplies. However, an institution may choose to consider other factors, such as a student's financial need, in the implementation of its policy.

An institution should not confuse its institutional refund policy with return of Title IV funds requirements. No federal regulation dictates what an institution may charge a student or how those charges are refunded. In addition, the withdrawal date that an institution uses in determining refunds is not required to be the same as the withdrawal date used in return of Title IV funds calculations. However, an institution's refund policy must comply with any applicable state, accrediting agency, or other outside agency requirements.

An institution's refund policy may be expressed as *either* the:

- Schedule of revised institutional charges incurred by students who change their enrollment status based on the length of time they remain enrolled or the use of services and facilities; **or**
- Amount or percentage of original institutional charges to be refunded to the student based on the date the student's enrollment status changed.

Policies

If another office is responsible for administering the school's refund policy, simply cross-reference that office's policies and procedures manual or some other publication that explains the refund policy and process. If cross-references to another office's policies and procedures manual are used, include only those policies and procedures that describe the financial aid office's role (if any) in the school's refund process in this section of the manual. For example, if your school's policy allows special treatment of high-need students, the financial aid office might have to certify whether a given student has demonstrated high need prior to the institutional refund calculation by that other office. This certification process should be included in the financial aid office's policies and procedures manual.

If your school's refund policy is largely unchanging, you may wish to incorporate it here for reference even though the policy originates with some other office. Include information such as:

- The office(s) responsible and the method(s) used to determine the date the student's enrollment status changed
- State or accrediting agency requirements that may apply
- The institutional office responsible for developing, updating, and distributing the institutional refund policy, as well as how it is disseminated
-  Cross-references to the relevant consumer information sections of the manual
- How the percentage or amount of the institutional refund is determined (e.g., it is based on the number of days enrolled, a flat rate, etc.)
- An explanation of how and why categories of students are treated differently (e.g., out-of-state students, graduate students, etc.) in the refund process

Provide a timeline by which calculations are performed, the student's account must be adjusted, students and/or other entities are notified, and institutional refund payments must be paid.

Response:

It is the student's responsibility to request a refund. Students must submit a refund request form and set up their eRefund Account.

The general refund policy covers the following fees:

- Enrollment fees,
- Non-resident tuition,
- Health fees,
- Student representation fees,
- Student body fees,
- Instructional material fee,
- Foliett access book program fee,
- Parking fee, and
- Transportation fee.

Procedures

Describe how the school's refund process is initiated (e.g., is it an automatic process or is the student required to request a refund). Provide a step-by-step description of how institutional refunds are calculated and who is responsible for each step. Describe in detail how the student and/or other entities are notified of the results of the refund calculation, and any other communications sent. Provide sample copies of correspondence sent to students and/or other entities in the forms section of the appendix and cross-reference them here.

Response:

Students may submit a request for a refund if withdrawing from courses within the first two weeks of a full semester (16-week) course or, in the case of non-16-week courses, before 10-percent of the class meetings have passed.

After the second week of a full-semester course, or after 10-percent of the class meetings have passed on a non-16-week course, no refunds are available. Any additional classes added after the respective refund period will incur financial responsibility.

14.1 Institutional Refund Components

Policies

List the components used in your institutional refund calculation, such as tuition, fees, institutionally provided books, course materials, supplies, and equipment, living expenses (housing and food), student insurance, etc. Describe policies regarding returning equipment. Include information about nonrefundable charges such as student activity fees, parking fees, etc.

Describe the role of the financial aid office in determining the refund components, if any. Cross-reference the policies and procedures of other offices responsible for determining refund components.

Response:

See Section 14: Institutional Refunds

Procedures

Describe how the school determines if a component is an institutional or noninstitutional charge (i.e., a charge to the student's account collected by the institution but passed through to an unaffiliated entity). Include information such as:

- How the determination of the charge is documented
- How the student is informed about returning equipment
- Deadlines or timeframes for returning equipment

Cross-reference the policies and procedures of other offices responsible for determining if a component is an institutional or noninstitutional charge.

Response:

See Section 14: Institutional Refunds

14.2 Institutional Refund and Repayment Appeals

Policies

If your school allows students to appeal the amount of an institutional refund, the amount of outstanding charges, or the repayment of institutional aid, explain the appeal process and give examples of reasons an appeal may be approved or denied. The policy may list examples such as a serious illness, a call-up to active duty in the military, or an employer-mandated transfer as examples of approved appeals. Similarly, forgetting a deadline for dropping a class, or a refusal to provide financial aid requested documents may be listed as examples of denied appeals.

Specify the office, or the individuals by position, that review appeals. If a committee reviews the appeals, indicate the make-up of the committee. If the financial aid office is involved in the appeal process, describe its involvement. If there is an appeal schedule or deadline, describe it (e.g., appeals are accepted before the end of the term; or appeals must be submitted within 60 days or prior to the end of the award year, whichever is later). If the financial aid office is not involved in the appeal process, you may want to cross-reference the responsible office's policies here.

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe the appeal process here. Include information such as:

- How the student initiates an appeal
- Deadlines pertaining to submitting an appeal
- How appeals are reviewed
- How often appeals are reviewed (if there is a schedule, mention that here)
- How the student will be notified about the appeal's outcome
- How and when adjustments are made to the student's school account, if needed
- How and when students are notified of applicable account adjustments

You may want to cross-reference any correspondence sent to students included in the forms section of the appendix.

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

14.2.1 Documentation

Policies

Describe the type of documentation required to process an appeal, including:

- Any institutional form(s) required for submitting an appeal
- Examples of acceptable documentation, such as a doctor's statement for those who withdraw due to illness
- Deadlines by which documentation must be received
- The consequences of not submitting documentation

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

Procedures

Describe the action taken once documentation is received and the follow-up process if documentation is incomplete. Include information about how documentation is routed to the appropriate person(s) and where the documentation is maintained. Cross-reference the document collection and tracking section of the manual.

Response:

Not applicable to the Merced Community College District (MCCD) financial aid offices.

14.X - Reserved for Institutional Use

This section is reserved for any institution-specific area of policies and procedures not covered in previous sections. It may be necessary to include several sub-sections of institution-specific content within this area. If there is no institutional content, simply leave the area blank, or mark the box Complete as preferred.

Section 15: Title IV Fraud

15.1 Student Fraud

Institutions must refer applicants who are suspected of having engaged in fraud or other criminal misconduct in connection with the Title IV programs to the U.S. Department of Education's (ED's) Office of Inspector General (OIG). The regulations require only that the institution refer the suspected case for investigation, not that it reaches a firm conclusion about the propriety of the applicant's conduct. The institution should confer with its legal counsel before making an OIG referral.

Resources:

668.16(f)
2025-26 FSA Handbook, Vol. AVG, Ch. 5
668.16(g)
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024

To determine suspected fraud, the school must develop and apply an adequate system to identify and resolve discrepancies in the information received from different sources with respect to a student's application for Title IV aid. Some of these areas include but are not limited to:

- All student aid applications (e.g., federal, state, institutional, etc.)
- Need analysis documents (e.g., Institutional Student Information Records [ISIRs] and FAFSA Submission Summaries[FSS])
- Copies of federal income tax transcripts or acceptable alternatives and state income tax returns
- Information regarding a student's citizenship
- Use of false identities
- A student's previous educational experience (e.g., school credentials such as high school diplomas or academic transcripts)
- Documentation of the student's Social Security Number (SSN)
- Other factors relating to the student's eligibility for funds under the Title IV aid programs

Policies

Resources:

668.16(g)(1)
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024

Describe your policies regarding suspected fraud. Provide examples of financial aid fraud such as:

- Falsified documents or forged signatures on applications, certifications, verification documents, or loan promissory notes
- False statements of income
- False statements of citizenship
- Use of false or fictitious names or aliases, addresses, or SSNs, including the deliberate use of multiple SSNs
- False claims of independent status
- Patterns of misreported information from one year to the next

Response:

The Merced Community College District (MCCD) financial aid offices assume that students and families will not provide misleading or fraudulent information, documents, or signatures. There are times when students or parents will misunderstand or misinterpret the question and will make an error on their documents. However, there are times when students or parents commit fraud. Students and parents who willfully submit fraudulent information will be fully investigated possible. All cases of fraud and abuse will be reported to the proper authorities.

Examples of financial aid fraud would include the following:

- Falsified documents or forged signatures on applications, certifications, verification documents, or loan promissory notes, or
- False statements of income, or
- False statements of citizenship, or
- Use of false or fictitious names or aliases, addresses, or SSNs, including the deliberate use of multiple SSNs, or

- False claims of independent status, or
- Patterns of misreported information from one year to the next.

Documents are reviewed most thoroughly when a student's Free Application for Federal Student Aid (FAFSA) is selected for federal verification. However, there may be times when a student has not been selected for federal verification, but documentation will still be requested for review based on inconsistencies that raise a flag for financial aid office staff.

After a review of the information and any documentation requested still brings up a concern about a potential fraud, the financial aid staff would refer the situation to the director of financial aid (DFA). If the DFA suspects fraud, the student information will be referred to the district director and the dean of students. Following their review, the final step would be for the DFA to make a referral to the Office of the Inspector General (OIG).

Procedures

Using the *If/Then Decision Table* in a step-by-step format is one way to illustrate your procedures for identifying and reporting suspected fraud. For example:

Step 1:

If … the student's application has been selected for verification, **then** the verification counselor reviews all required documents, such as the need analysis document (ISIR), tax transcripts, etc. **If** the verification counselor suspects fraudulent information (e.g., the signatures on the verification worksheet do not match those from the previous year)

Step 2:

Then … the verification counselor refers the file to the financial aid director for review.

Step 3:

If … after the financial aid director reviews the document(s), he or she suspects fraud,

Step 4:

Then … the financial aid director confers with the school's legal counsel.

Step 5:

If … the school's legal counsel feels there is suspected fraud,

Step 6

Then … the institution contacts OIG by calling 1-800-MISUSED.

You could use this format to chart other procedures used in reviewing student documents, such as subsequent ISIR transactions, C-code clearance, etc. You may want to cross-reference the file review and the document collection and tracking sections of the manual.

Response:

The MCCD admissions and records offices have implemented third-party software, called LightleapAI, to help eliminate fraudulent students from continuing the admission process. But if, in an aid administrator's judgment, there has been intentional misrepresentation, false statements, or alteration of documents which have resulted or could result in the awarding or disbursement of funds for which the student is not eligible, the case will be referred to the district director and dean of students for possible disciplinary action. After investigating the situation, if the district director believes there is a fraudulent situation, all information will be reported to the OIG or the local law enforcement agency.

If it is a matter of conflicting information, the financial aid office needs to collect additional documentation. If the conflicting or inaccurate information indicates that there may be fraud on the part of the student/parent, the financial aid staff is required to refer students who may have engaged in fraud or other criminal misconduct in connection with aid applications to the DFA.

The DFA will review the student's aid file with the appropriate aid administrator, and if the decision is made to pursue the possibility of denying or canceling financial aid, a written request to make an appointment is sent to the student. If the student does not make an appointment, the DFA may do

one of the following:

- Will not process the financial aid application until the situation is resolved satisfactorily.
- Will not award financial aid.
- Will cancel financial aid.
- Will determine that financial aid will not be processed in future years.

All processing of the application or disbursement of funds will be suspended until the district director or dean of students has made the decision whether the student shall be required to make an appointment. Fraudulent situations are reported to the OIG.

15.2 Institutional and Third-Party Fraud

The regulations provide the following example of criminal misconduct regarding institutional fraud:

- Payment 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

Resources:

668.14(b)(22)
668.16(g)(2)
Electronic Announcement, 12/17/24 (GENERAL-24-145)
2024-25 FSA Handbook, Vol. 2, Ch. 1, August 2024
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024
GEN-11-05
668.43(b)
GEN-14-04

 There must be a state complaint process in place for complaints about fraud or false advertising at the institutional level. Contact information must be provided to enrolled and prospective students for filing complaints. These must be handled by the state attorney general's office or a state agency as long as it has the authority to review, investigate, and resolve complaints against the school.

 FSA's Office of Enforcement will also take reports of potential violations of the Title IV programs from current or former employees, vendors, third-party servicers, students, contractors of postsecondary institutions, and any other relevant individual at Ed.gov/FSATips or FSATips@ed.gov.

Policies

Describe your school's policies and procedures to identify and investigate information indicating any employee, third-party servicer, or other agent of the institution acting in a capacity involving the administration or receipt of Title IV funds may have engaged in fraud or any illegal conduct involving the Title IV programs. If other offices are involved, you might want to cross-reference their policies here.

Resources:

668.16(g)(2)
GEN-23-08
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024
GEN-15-01
GEN-11-05
GEN-16-15

 Describe any training provided to institutional staff on identifying and preventing fraud and abuse of the financial aid programs. Include examples of fraud (e.g., the business office knowingly authorizes the release of Title IV funds to an ineligible student) so all staff will have a frame of reference for identifying and reporting suspected fraud.

Response:

MCCD staff work with information technology services (ITS) and student services on Identifying and preventing fraud and abuse of financial aid programs. Financial aid staff also participate in training programs offered through State and Federal organizations on preventing fraud.

Procedures

Describe how the financial aid office identifies suspected institutional or third-party servicer fraud. Explain what action is taken once suspected fraud is identified (e.g., the school's legal counsel is notified immediately). Include information about how other institutional offices, such as the business, admissions, and/or accounting offices, etc., communicate suspected Title IV fraud to the responsible office. You may want to cross-reference the procedures of all involved offices.

Response:

Applications to the MCCD colleges are vetted through the institution using internal and third-party services to identify potential fraudulent applications. The financial aid office will also flag a student's Institutional Student Information Record (ISIR) record using the FAFSA data and will require the

student to provide proof of identity. In addition, the institution has checks and balances with any third-party servicers that contract to work with the institution.

15.3 Referrals

If the school suspects a student, employee, or other individual has misreported information and/or altered documentation to increase student aid eligibility or to obtain federal funds fraudulently, it must report those suspicions and provide any evidence to ED's OIG.

The OIG Hotline: Fraud Prevention website at https://oig.ed.gov/oig-hotline 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*)

 ED's OIG has updated how it receives and processes information about suspected fraud rings at schools. Schools can submit fraud ring complaints through the OIG's encrypted complaint web portal at https://oighotlineportal.ed.gov

Resources:

Electronic Announcement, 8/21/20
2025-26 FSA Handbook, Vol. AVG, Ch. 5
GEN-11-17
2024-25 FSA Handbook, Vol. 2, Ch. 3, August 2024

Policies

Describe your school's policy for making referrals to the OIG. Include a statement identifying which school office or personnel have the authority to make OIG referrals. If this is not under the purview of the financial aid office, cross-reference the responsible office's policies here.

Response:

The DFA will make the referral to the OIG regarding any fraudulent activity.

Procedures

Describe any actions taken to investigate the suspected fraudulent activity before reporting it to the OIG. If this is a shared institutional responsibility, briefly describe how all involved offices communicate with one another.

A flowchart might be a good tool to illustrate this procedure. For example, the admissions office suspects a forged signature on an academic transcript that a Title IV recipient submits. The admissions director reports this information to the financial aid office. The financial aid office calls the previous school and learns the student never attended. The financial aid office reports this information along with supporting documentation to the institutional lawyer. The lawyer refers the information to the OIG.

Provide details about how suspected fraud is referred to the OIG (e.g., by telephone, submitting a Hotline Complaint Form, etc.). If one office assumes all responsibility for reporting to the OIG, explain that here. You might want to cross-reference the procedures of all offices involved and provide copies of forms or correspondence in the appendix.

Response:

The DFA will review the student's documents with the admissions and records office regarding the suspected fraudulent activity. The ITS office may also be involved in reviewing the record and any connected activity. The DFA will also conduct an interview with any victim of identity theft to confirm any identity theft or suspected fraud using the victim's information. After working with institutional partners, the OIG will be notified.

The OIG can be made by filing the OIG online form

Hotline Office of Inspector General U.S. Department of Education:1.800.647.8733.

Address: 400 Maryland Avenue, SW Washington, DC 20202-1500

15.X - Reserved for Institutional Use

This section is reserved for any institution-specific area of policies and procedures not covered in

previous sections. It may be necessary to include several sub-sections of institution-specific content within this area. If there is no institutional content, simply leave the area blank, or mark the box Complete as preferred.

Section 16: Audits

16 Audits

A school that participates in any of the Title IV programs must undergo an annual compliance audit and an annual audit of the institution's financial statements by an independent auditor, who may be a certified public accountant or a government auditor.

 Independent auditors must substantiate the following calculations every year on an award year basis for the institution and/or its programs to maintain eligibility:

- Percentage of correspondence courses offered and the percentage of regular students who enroll in correspondence courses
- Percentage of regular students who are incarcerated
- Completion rates for confined or incarcerated individuals in nondegree programs at nonprofit institutions
- Percentage of regular students who lack a high school diploma or its recognized equivalent
- Completion and placement rates for short-term programs

Although a school's compliance and financial statement audits may be performed by different independent auditors, both audits must be submitted together as one package to the U.S. Department of Education (ED) .

Institutions and auditors are also required to evaluate compliance with regulations when using a servicer or financial institution to deliver credit balances using a card or other devices to access funds. This includes student consent to open an account before any card or other access device is provided to the student, except in the case of student ID cards, which may be used for multiple purposes.

Schools meeting certain eligibility criteria may request a waiver of annual audit submission requirements. If ED approves the school's request, the waiver applies only to the annual audit submission to ED. This means the school must still conduct an annual audit of its Title IV program administration, but it does not have to submit the audit report to ED for up to three years. At the end of the waiver period, the school must submit a compliance audit covering each individual fiscal year in the waiver period and a financial statement audit for the last year of the waiver period.

Schools are required to submit their compliance audit and audited financial statements to ED via the eZ-Audit Electronic Financial Reporting System website at https://ezaudit.ed.gov. Public and private nonprofit institutions must include copies of the Office of Management and Budget's (OMB's) Circular A-133, *Audits of States, Local Governments, and Nonprofit Organizations* (filed with the Federal Audit Clearinghouse. Foreign schools may use the eZ-Audit process as well.

 The *Step-by-Step Guide to Using eZ-Audit* contains guidance for submitting a school's compliance audits and audited financial statements. A separate guide is available for public institutions, for nonprofit institutions, and for proprietary institutions. These guides may be downloaded from https://ezaudit.ed.gov/EZWebApp/common/steps_to_create_submission.jsp.

 Note: The Single Audit Act is a requirement of the Office of Management and Budget (OMB) and not of the U.S. Department of Education (ED). NASFAA does not regularly track Single Audit Act submission deadlines.

Please reach out to your school's Single Audit Act compliance contact or the Office of Federal Financial Management at GrantsTeam@omb.eop.gov.

Response:

Resources:

668.23(b)
668.23(a)
HEA 487(c)
668.23(d)
600.7(b)
668.161(a)(2)
Electronic Announcement, 10/31/24 (GENERAL-24-127)
2024-25 FSA Handbook, Vol. 2, Ch. 4, August 2024
600.7(c)
Electronic Announcement, 12/21/23 (GENERAL-23-121)
600.7(g)
600.7(d)
668.8(e)(2)
668.8(f)
668.8(g)
668.164(e)(2)(i)
668.164(f)(4)(i)(B)
Electronic Announcement, 9/28/23 (GENERAL-23-83)
Electronic Announcement, 4/7/20
668.27
Electronic Announcement, 7/17/20
Guide for Financial Statement Audits and Compliance Attestation Engagements of Foreign Schools

To show administrative capability, the Merced Community College District (MCCD) must show no evidence of significant problems that affect their ability to administer a Title IV, HEA program, as identified in internal audits.

On or before April 1 of the fiscal year, the Board shall approve the selection of an auditor who shall be a certified public accountant licensed by the California State Board of Accountancy.

An auditing firm's contract shall be for no more than three years with two, one-year extensions. The audit shall include all funds under the control or jurisdiction of the district. The audit shall identify all expenditures by source of funds, and shall contain:

- A statement that the audit was conducted pursuant to standards and procedures developed in accordance with Education Code Section 84040.5, and
- A summary of audit exceptions and management recommendations.

The district shall file an audit report with other agencies specified in the California Community Colleges Chancellor's Contracted District Audit Manual, for the preceding fiscal year no later than December 31, unless this date is extended by the California Community Colleges Chancellor's Office.

The audit firm that currently conducts the annual compliance audit and audited financial statements for MCCD is:

CWDL
3131 Camino Del Rio North, Suite 820
San Diego, CA 92108
858.565.2700
https://www.cwdl.com/contact/

16.1 Type of Audit

The type of compliance audit a school undergoes depends on its type of control: public, nonprofit, or for profit. Audits for public and private nonprofit institutions must be conducted in accordance with the OMB Circular A-133.

Audits for for-profit institutions and third-party servicers must be conducted under Office of Inspector General's (OIG) *Guide for Audits of Proprietary Schools and For Compliance Attestation Engagements of Third-Party Servicers Administering Title IV Programs* (Audit Guide).

Audits for foreign institutions must be conducted using the OIG's *Guide for Financial Statement Audits and Compliance Attestation Engagements of Foreign Schools* (Foreign School Audit Guide).

Resources:

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 of Foreign Schools
2024-25 FSA Handbook, Vol. 2, Ch. 4, August 2024
Electronic Announcement, 4/17/23 (GENERAL-23-24)

Resources:

668.23(c)
GEN-23-08
668.25
668.23(a)(1)
GEN-15-01
668.23(g)(4)
668.27
GEN-16-15
668.23(e)
668.23(g)
2024-25 FSA Handbook, Vol. 2, Ch. 4, August 2024

Policies

Although the financial aid office may not be directly involved during each phase of an audit, staff should be knowledgeable about the process. A flowchart, if utilized, should show all institutional offices involved and illustrate the communication among these offices, the financial aid office, and the independent auditor. You might want to cross-reference the policies and procedures of all offices involved in the audit process.

 Note: GEN-23-08 rescinded the prohibition and removed the implementation date of September 1, 2023. GEN-23-08 also rescinded the guidance in GEN-16-15 and the March 8, 2017, Electronic Announcement, *Updated Third-Party Servicer Questions and Answers* prohibiting contracts between colleges and foreign-owned or operated servicers.

Audit policies should include information such as:

- The definition of an independent auditor, institutional policies for selecting an independent auditor, and the name of the independent auditor or auditing firm your school uses
- Your school's type of control and the type of audit the school must submit (e.g., a public school must submit its audit in accordance with OMB Circular A-133)
- A list of any third-party servicers contracted by your school
- A statement acknowledging your school's responsibility for any liability owed by the institution's third-party servicer for a violation incurred in servicing any aspect of the institution's participation in the Title IV programs (if applicable)
- An explanation of why the school would request a waiver of the annual audit submission requirements (if applicable)
- A description of all institutional offices involved in the audit process
- The name and title of individual(s) responsible for coordinating the overall audit process including knowing the dates the auditors will be at the school, and making sure someone is available to provide documentation and answer questions
- Financial aid office personnel who have contact with the auditor
- The type of Title IV records the financial aid office provides to the auditor
- The name and title of individual(s) responsible for coordinating staff for the exit interview
- The distribution list containing the names of individuals within the organization who will be notified of any audit findings
- The institutional office responsible for addressing and reconciling any audit findings, as well as the timeframe for doing so
- The name and title of individuals responsible for ensuring any Title IV funds identified during the audit as having been improperly disbursed are repaid within specified timeframes
- The name and title of individual(s) responsible for timely submission of audit reports to ED

Response:

Title IV, Uniform Guidance, and OMB Circular A-133 are all related to the auditing of entities that receive federal funds.

Procedures

Provide a step-by-step description of how the financial aid office participates in the audit process. Include information such as:

- How the financial aid office is notified of the records needed for an audit and who is responsible for coordinating with the auditor and providing the requested records
- How the records are accessed and provided to the auditor (e.g., electronic records are generated, paper files are manually retrieved, etc.)
- Who is responsible for documenting each file that is reviewed by an auditor and how this information is documented in the file
- How the financial aid office is notified of any audit findings
- How the financial aid office addresses any audit findings for which it is responsible within required timeframes

 It is a good practice to designate one individual in the financial aid office to communicate with the auditor and coordinate all records requested by the auditor.

Response:

The following offices are involved in the single audit process:

- The financial aid office.
- The student fees office.
- The registrar's office.
- The office of institutional effectiveness and technology support.

For the single audit, the information that is provided by various departments are listed below:

- Financial Aid Offers listing the award amounts
- Verification documentation
- Professional Judgment documentation
- Satisfactory Academic Progress (SAP) Appeals and SAP Statuses
- Pell Grant Records/Reports
- Student Account Information
- Return to Title IV (R2T4) Records.
- Withdrawal Records
- Policies and Procedures
- NSLDS Enrollment Records
- Third-Party Agreements
- Accreditation
- Federal Funds Bank Statements
- Schedule of Expenditures of Federal Awards (SEFA)
- Transcripts
- Gramm-Leach-Bliley Act (GLBA) compliance

CWDL Sure Link Portal: CWDL provides a Sure Link Portal to upload all A-133 documents needed for the audit.

16.2 Audit Submission Schedule

Compliance audits must be performed on a fiscal-year basis and must cover all Title IV transactions that have occurred since the school's previous compliance audit. Audits will cover the institution's most recently completed fiscal year. The school's audited financial statements must be prepared using accrual basis accounting in accordance with Generally Accepted Accounting Principles (GAAP) and audited according to Generally Accepted Government Auditing Standards (GAGAS) issued by the Comptroller General of the United States.

 A school that falls under the Single Audit Act follows submission requirements contained in OMB Circular A-133. A school that has its annual compliance audit and the audit of its financial statement performed in accordance with ED's *Audit Guide* must submit its audit by the earlier of:

- 30 days after the completion of the report, or;
- Six months of the end of the school's fiscal year.

Financial statements submitted to report the compliance audit must match the fiscal year of return(s) submitted to the Internal Revenue Service (IRS).

Resources:

668.23(b)(1),(2)
668.23(d)(1), (d)(2)(ii)
Electronic Announcement, 10/31/24 (GENERAL-24-127)
2024-25 FSA Handbook, Vol. 2, Ch. 4, August 2024
Electronic Announcement, 5/15/24 (CB-24-10)
Electronic Announcement, 4/17/23 (GENERAL-23-24)
668.23(a)(4),(5)
GEN-24-07

 If a school, whether foreign or domestic which offers Title IV aid, is owned directly or indirectly by a foreign entity with at least 50 percent voting power or equity interest, the school must provide documentation of the entity's status under the law of the jurisdiction where the entity is organized.

Documentation will include:

- Date of organization
- Current certification of good standing
- Copy of statute authorizing the entity's status
- Articles of organization and bylaws, and;
- Current operating or shareholders agreements

 The Single Audit Act is a requirement of the Office of Management and Budget (OMB) and not of the U.S. Department of Education (ED). NASFAA does not regularly track Single Audit Act submission deadlines.

Please reach out to your school's Single Audit Act compliance contact or the Office of Federal Financial Management at GrantsTeam@omb.eop.gov.

Policies

Indicate the time frame by which the financial aid office must provide information needed to complete the audit and to ensure the school's audit submission by the applicable due date. If other offices are involved in the process, you may wish to cross reference the policies of those offices.

Response:

The single audit is performed on a fiscal year basis and covers all Title IV transactions that have occurred since the last audit was performed.

Procedures

Describe when and how your school submits its annual audit. You may want to cross reference the responsible office's policies and procedures if it is not the financial aid office.

Response:

CWDL Sure Link Portal: CWDL provides a Sure Link Portal to upload all A-133 documents needed for the audit.

16.X - Reserved for Institutional Use

This section is reserved for any institution-specific area of policies and procedures not covered in previous sections. It may be necessary to include several sub-sections of institution-specific content within this area. If there is no institutional content, simply leave the area blank, or mark the box Complete as preferred.

Section 17: Reserved for Institution

17 Reserved for Institution

This section is reserved for any institution-specific area of policies and procedures not covered in sections 1 through 16. For example, an institution may choose to place the policies and procedures for the administration of private and/or institutional scholarship programs in this section of the manual.

Resources:

P.L. 117-2
P.L. 116-260
P.L. 116-136
34 CFR 685.222

Section 18: Appendices

18.1 Forms and Correspondence

Provide copies of all forms and correspondence the school uses for the administration of all Title IV programs and non-Title IV programs available to its students. If forms and correspondence are maintained in electronic format, indicate where documents are located. Such forms might include, but are not limited to:

- Appeal forms for professional judgment (e.g., budget adjustments, change of dependency status, etc.)
- Application forms [e.g., Free Application for Federal Student Aid (FAFSAs), institutional applications, scholarship forms, state aid forms, outside aid forms, etc.]
- Authorization forms for cash management requirements
- Authorization forms for use of electronic means to collect authorizations and to provide notifications
- Consortium/contractual agreement documents
- Consumer information and disclosure forms
- Entrance and exit loan counseling forms
- Family Educational Rights and Privacy Act (FERPA) authorization consent forms
- Federal Direct Student Loan (Direct Loan) active confirmation forms
- Federal Direct Student Loan Master Promissory Note (MPN)
- Federal Direct PLUS Loan Master Promissory Note (MPN)
- Financial aid offer communications (original and revised)
- I-9 forms for student employees
- Incomplete and/or missing information letters
- Off-campus student employment agreements
- Overpayment referral forms
- PLUS certification forms for parent and graduate borrowers (e.g., default/federal overpayment statement)
- Private Education Loan Application and Solicitation Disclosure Form
- Private Education Loan Approval Disclosure Form
- Private Education Loan Final Disclosure Form
- Private Education Loan Self-Certification Form
- Return of Title IV funds calculation worksheets
- Return of Title IV funds correspondence to students/parents
- Satisfactory academic progress correspondence
- Student employee timesheets
- Teacher Education Assistance for College and Higher Education (TEACH) Grant Agreement to Serve or Repay (ATS)
- Verification forms (dependent, independent worksheets, etc.)
- Withdrawal forms

Response:

General Forms Used in the Financial Aid Office:

Professional Judgment:

- All forms and documentation are collected through CampusLogic in the Student Forms account.

Return to Title IV:

1. Notice of the R2T4 Calculated Amounts Returned
2. Notice of the R2T4 Post-Withdrawal Disbursement

Satisfactory Academic Progress:

1. Satisfactory Academic Progress (SAP) Notice
2. SAP Suspension Notice
3. SAP Appeal Denied and/or Approved Notice

File Review and Verification: Financial Aid Forms

1. All forms and documentation are collected and reviewed through Student Forms.

18.2 Resources and Reference Documents

Some useful resources and reference documents, consisting of U.S. Department of Education (ED) publications, Web links, and NASFAA Tools and Resources, might include but are not limited to:

- 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, I 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
- FAFSA Specifications Guide (includes the Summary of Changes, FPS Schedule and Getting Help, Electronic Data Exchange and FAFSA Processing, Record Layouts, Processing Codes, Edits and Rejects, ISIR Guide, Comment Codes, Agency Matches, and Testing and Web Demo System volumes)
- Federal Registers
- Federal Student Aid Handbooks
- Federal Student Aid Training
- FISAP Technical Reference
- 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 Webinar materials
- NASFAA Self-Study Guides
- 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 Fresh Start Web Center
- NASFAA's How-to Guides
- NASFAA's Title IV Eligibility Checklist: Considerations for Adding New Programs and Locations
- NSLDS Enrollment Reporting Guide
- NSLDS Financial Value Transparency and Gainful Employment (FVT/GE) User Guide
- NSLDS FVT/GE Supplemental Training Resource
- NSLDS Newsletters
- NSLDS User Guide for Transfer Student Monitoring on the Web
- Program Integrity Information - Questions and Answers
- Program Review Guide for Institutions
- SAVE System Instructions for U.S. Department of Education (School) Users Version 3.0
- Student Aid Index (SAI) and Pell Grant Eligibility Guide (formerly the EFC Formula Guide)
- Student Aid Reference Desk (Ref Desk)

Response:

- CASFAA Website
- CSAC 2025-2026 Cal Grant Handbook
- 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
- Dear Colleague/Partner Letters
- Electronic Announcements
- FAFSA Pell Eligibility and Student Aid Index (SAI) Guide (formerly the EFC Formula Guide)
- FAFSA Specifications Guide 2025-2026
- Federal Registers
- Federal Student Aid Handbook: 2025-2026
- Federal Student Aid Training
- FISAP Technical Reference
- Guide for Audits of Proprietary Schools and for Compliance Attestation Engagements of Third-Party Servicers Administering Title IV Programs
- Health and Human Services Student Financial Aid Guidelines

- 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 Fresh Start Web Center
- NASFAA's How-to-Guides
- NASFAA's Title IV Eligibility Checklist: Considerations for Adding New Programs and Locations
- NASFAA Self-Study Guides
- NASFAA Webinar materials
- NSLDS Enrollment Reporting Guide
- NSLDS Newsletters
- NSLDS User Guide for Transfer Student Monitoring on the Web
- Program Review Guide for Institutions
- SAR Comment Codes and Text Guide (see FAFSA Specifications Guide)
- SAVE System Instructions for U.S. Department of Education (School) Users Version 3.0
- Student Aid Reference Desk (Ref Desk)
- The ISIR Guide 2025-2026 Volume 7 (see FAFSA Specifications Guide)

18.X - Reserved for Institutional Use

This section is reserved for any institution-specific area of policies and procedures not covered in previous sections. It may be necessary to include several sub-sections of institution-specific content within this area. If there is no institutional content, simply leave the area blank, or mark the box Complete as preferred.