

<b>NEOMED ACADEMIC POLICY</b>	<b>POLICY NO: 3349-AC-260</b>
<b>ACADEMIC POLICY TITLE:</b> Financial Aid Eligibility, Application, and File Verification Policy	<b>EFFECTIVE DATE:</b> May 1, 2021 <b>REVISED AND UPDATED:</b> May 23, 2024
<b>RESPONSIBLE DEPARTMENT:</b> Office of Financial Aid	<b>APPROVAL AUTHORITY:</b> Office of the Provost and Senior Vice President for Academic Affairs

**(A) PURPOSE**

The purpose of this policy is to establish eligibility criteria and identify the relevant forms and processes required to qualify for Financial Aid at NEOMED.

**(B) SCOPE**

This policy applies to all students enrolled in any degree or certificate program at the University who wish to be considered for Federal Title IV Financial Aid, Health Resources and Services Administration ("HRSA") Funding, or NEOMED-Based Financial Aid, and outlines the process. This policy details the circumstances in which a student's Financial Aid application would be subject to a review process called Verification.

Financial Aid policies are written and revised with the intent of being compliant with regulations set forth from the United States Department of Education and other agencies from which NEOMED receives funding. In the event new regulations are created or existing regulations are revised or removed, the most up to date regulations will be enforced regardless of whether the process of updating this policy has been completed.

**(C) DEFINITIONS**

- (1) "Student Aid Index" (SAI), also known as "Expected/Estimated Family Contribution (EFC)", is a calculation of what the family of a student may be able to contribute (though not expected to pay) toward education costs based on income, asset, and household size data reported on the Free Application for Federal Student Aid (FAFSA).
- (2) "Family Educational Rights and Privacy Act" (FERPA) refers to the federal law that governs release of, and access to, student education records. University officials are required to protect the confidentiality of student education records as well as regulate access and disclosure both by the student and others, as established by the Office of the Registrar in accordance with FERPA.

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- (3) "Federal Verification" refers to the process used by both the U.S. Department of Education and NEOMED to confirm information a student or prospective student has provided on the FAFSA, which may include parental income and demographic information.
- (4) "Free Application for Federal Student Aid" (FAFSA) refers to a federal application used to determine a student's eligibility for Financial Aid. The resulting EFC or SAI is used to establish a student's financial need for NEOMED-Based Financial Aid. The FAFSA is required annually.
- (5) "Health Resources and Services Administration Funding" (HRSA Funding) refers to federal funding that is awarded to NEOMED through a grant application process and is administered by the NEOMED Office of Financial Aid utilizing the terms and conditions set forth by HRSA. Funding under HRSA includes but is not limited to Title VII Loan Programs (i.e., Loan for Disadvantaged Students, Primary Care Loan, Health Professions Student Loan) and the Scholarship for Disadvantaged Students.
- (6) "NEOMED-Based Financial Aid" includes all funding from the NEOMED Foundation, NEOMED operating budget, and NEOMED business arrangements. Institutional funds available to NEOMED students include scholarships (need and non-need), need-based loans, and forgivable loans.
- (7) "Student Aid Report (SAR) Comment Codes" refers to an alert that is placed on a Student Aid Report that indicates a student is ineligible for Federal Financial Aid until the issue(s) are resolved.
- (8) "Title IV Financial Aid" refers to funding from the Federal Student Aid Office of the U.S. Department of Education. Title IV Financial Aid funds available to NEOMED students include loans from the William D. Ford Federal Direct Loan (Direct Loan) Program, Direct Unsubsidized Loans, and Direct PLUS Loans (Graduate PLUS).

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**(D) FINANCIAL AID ELIGIBILITY**

- (1) For a student to be eligible for Federal Title IV Financial Aid, HRSA funding, and/or NEOMED-Based Financial Aid, they must:
  - (a) Be admitted to a degree granting, accredited program in which NEOMED has received approval to offer by both the Higher Learning Commission and the Ohio Department of Higher Education. Certificate programs are not eligible for Federal Title VI Financial Aid or HRSA Funding but may be eligible for NEOMED-Based Financial Aid.
  - (b) At the time of admittance, a student must have obtained either a bachelor’s degree, or at least 72 credit hours of undergraduate coursework. Students who are admitted without either will not be eligible to receive Title IV Financial Aid or HRSA funding until such time as their undergraduate plus NEOMED coursework equals to or is greater than 72 credit hours, but are eligible for funding through the NEOMED-Based Financial Aid Programs. Eligibility will begin the payment period after the students combined earned credit hours is equal to or greater than 72 credit hours. Eligibility will not begin during a payment period and will not be retroactive.
  - (c) Be enrolled at half-time status or greater to qualify for Title IV Financial Aid and NEOMED-Based Financial Aid, and full-time status or greater to qualify for HRSA Funding, defined as:
    - (i) Colleges of Dental, Medicine, and Pharmacy
      - (a) Full Time Status: 9 credits or greater
      - (b) Three-Quarter Time Status: 6.5 – 8.5 credits

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(c) Half Time Status: 4.5 – 6 credits

(d) Less than Half Time Status – Less than 4.5 credits

(ii) College of Graduate Studies

(a) Full Time Status: 8 credits or greater

(b) Three-Quarter Time Status: 6 – 7.5 credits

(c) Half Time Status: 4 – 5.5 credits

(d) Less than Half Time Status: Less than 4 credits

(d) Meet the [U.S. Department of Education's Federal Student Aid eligibility requirements](#) for purposes of Federal Title IV Financial Aid.

(e) Be engaged in credit-bearing coursework that is required for degree conferral to be considered for Title IV Financial Aid. Coursework/elective registration that is not required for degree completion is not eligible for Title IV Financial Aid and may affect eligibility for HRSA Funding and NEOMED-Based Financial Aid.

(2) Students who are ineligible for Federal Title IV Financial Aid may be eligible for private student loans and should contact the Office of Financial Aid for guidance.

**(E) DEPENDENCY STATUS**

(1) Federal Title IV Financial Aid

(a) The U.S. Department of Education stipulates that students who are in a graduate/professional program working on a master's/doctorate degree

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are classified as independent for Financial Aid purposes. This classification may vary from income tax classifications.

- (b) Students will not be required to place parental data on the FAFSA to qualify for Federal Title IV Financial Aid.
- (2) NEOMED-Based Financial Aid
- (a) Students are not required to place parental income and asset data on the FAFSA to qualify for NEOMED-Based Financial Aid.
- (3) HRSA Funding
- (a) The determination of whether a student must include parental data or not depends on the HRSA Funding program for which a student could be eligible.
  - (b) Scholarship For Disadvantaged Students
    - (i) Parental information must be provided on the FAFSA as a means of determining economically disadvantaged status and financial need. HRSA does provide exceptions to this, providing the student is age 24 and not claimed on their parents' federal income tax for the last three (3) years. Documentation will be required to substantiate their independent status.
  - (c) Health Professions Student Loan and Loan for Disadvantaged Students
    - (i) Parental information must be provided on the FAFSA as a means of determining qualifying for these need-based student loans. Exceptions would be if a student could provide documentation that their parents are deceased.

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(d) Primary Care Loan

- (i) Parental information must be provided on the FAFSA as a means of determining financial need. HRSA does provide exceptions to this, providing the student is age 24 and not claimed on their parents' federal income tax for the last three (3) years. Documentation will be required to substantiate their independent status.

- (e) While the inclusion or omission of parental data may affect student eligibility for HRSA Funding, neither the inclusion nor omission of parental data affects student eligibility for Title IV Financial Aid Direct Loan funding or NEOMED-Based Financial Aid.

**(F) DOCUMENTS FOR FINANCIAL AID ELIGIBILITY AND DISBURSEMENT**

- (1) Federal and NEOMED application materials required prior to the issuing of a Financial Aid offer will depend on the financial aid program a student is seeking.:

- (a) Title IV Financial Aid:

- (i) FAFSA –The FAFSA is required annually. The U.S. Department of Education evaluates FAFSA data to establish a student's eligibility for Financial Aid, including, but not limited to the following items:

- (a) Citizenship Status;

- (b) Degree Seeking/Year in College;

- (c) Parent and Student Adjusted Gross Income, assets, number in household and college;

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- (d) Student housing status;
  - (e) Unusual Enrollment History ;
  - (f) Title IV Financial Aid Direct Loan aggregate borrowing.
- (b) NEOMED-Based Financial Aid, HRSA Funding:
- (i) FAFSA Application - The resulting SAI is used to establish a student's financial need for NEOMED-Based Financial Aid. The FAFSA is required annually.
  - (ii) Financial Aid Supplemental Application – Students applying for Financial Aid must complete a separate application that requests demographic information not obtained elsewhere in order to qualify for NEOMED-Based Financial Aid, , and disclosure of any outside scholarship source that will be paid to the University on behalf of the student.
- (c) Documents required to receive a disbursement of Federal Title IV Financial Aid, HRSA Funding, or NEOMED-Based Financial Aid include, but are not limited to, the following:
- (i) Title IV Financial Aid Direct Loan Promissory Notes – prior to a Title IV Financial Aid loan disbursement, a student must complete a Direct Loan Master Promissory Note for each of the loan programs they apply for, a Direct Subsidized/Unsubsidized Promissory Note, or a Direct Graduate PLUS Promissory Note. Students complete their promissory note(s) online at the [Federal Student Aid website](#). Confirmation of completion will be sent securely to NEOMED by the Department of Education. In general, once linked to a loan, promissory notes are valid for 10 years. NEOMED will use valid 10-

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year promissory notes already on file with the lender, even if completed prior to matriculation at NEOMED. Students who prefer to complete a new promissory note each year should contact the Office of Financial Aid to notify the office of their intent to use a single year promissory note.

- (ii) Title IV Financial Aid Student Loan Counseling – prior to a Federal Title IV Financial Aid loan disbursement, Entrance Counseling for Graduate or Professional students is required when a Direct Unsubsidized Loan or Direct Graduate PLUS Loan has not previously been received. Entrance counseling is an online module containing content related to the rights and responsibilities related to borrowing a federal student loan. Upon ceasing enrollment, student loan exit counseling is required. Exit counseling is an online module containing content related to ensuring students understand and are prepared to repay student loans after their enrollment drops below Half Time Status or graduation. Both counseling modules can be completed online at the [Federal Student Aid website](#). Confirmation of completion will be sent securely to NEOMED by the Department of Education.

There are circumstances where a student may be denied a Graduate PLUS Loan and additional counseling may be required. Students who will be required to complete additional counseling will be contacted by the lender, Direct Loans and NEOMED Office of Financial Aid.

- (iii) Title VII Promissory Note – prior to a Title VII Loan disbursement, students will be required to complete a promissory note, final disclosure, truth in lending, rights and responsibilities, and a private loan self-certification form. The Promissory Note is digital and

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requires electronic signatures. A Title VII Promissory Note is required annually.

- (iv) Title VII and NEOMED-Based Loan Counseling – prior to a Title VII and NEOMED-Based Loan disbursing, student loan entrance counseling is required. Students will be required to watch a video and acknowledge their understanding of the terms and conditions of the loan(s) they received.
- (v) NEOMED Foundation Loan Promissory Note – some students may be eligible for need-based student loans offered through NEOMED. These private student loans will require the student to complete a promissory note and final disclosure, rights and responsibilities, terms and conditions, reference form, and private loan self-certification form prior to disbursement. Promissory notes will be required each academic year a student receives funding.
- (d) While not required, the NEOMED Office of Financial Aid encourages Financial Aid applicants to complete the following forms:
  - (i) Consent to participate in electronic delivery and signatures.
    - (a) Voluntary Consent allows for communication of authorizations, notifications, and transactions related to Federal Student Aid to be transmitted electronically. This includes, but is not limited to, the FAFSA, Master Promissory Notes, required loan counseling, accepting and declining Financial Aid, authorizations to hold and release Financial Aid, consent to release FERPA protected data, communications using email, and the ability to submit Financial Aid offer decisions through Student Self-Service.

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Students who consent to electronic delivery and signatures acknowledge that they:

- (i) Have the right to withdraw their consent for electronic communications at any time.
- (ii) Understand that the NEOMED Office of Financial Aid's primary point of contact is the student's NEOMED email address and that they will not be able to request alternate email address for the purpose of email delivery.
- (iii) Have the right to request a paper copy of any electronic document sent at any time.
- (iv) Are responsible for the installation, maintenance, and operation of their own computer, web browser, and software. NEOMED is not responsible for errors or failures due to any malfunction of a student's personal computer, web browser, software, or computer viruses or related problems.

(b) Students who do not consent to electronic delivery and signatures acknowledge that:

- (i) At any time, the student can consent to participate in electronic delivery and signatures.
- (ii) All communications will be sent through the United States Postal Service ("USPS"), first to a local address on file. If no local address is on file, a permanent address will be used. It is the student's responsibility

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to ensure that an updated USPS address is on file with the Office of the Registrar. The student will not be exempt from deadlines due to delays with USPS delivery.

- (iii) No email exchanges will be permitted and all requests for information must be made either in person or in writing with a wet signature.
  - (iv) Phone conversations will be permitted after Verification of identity.
  - (v) Unless the student changes their elections, consent to participate in electronic delivery and signatures only need to be completed once.
- (ii) Title IV Financial Aid Authorization – federal regulations limit the use of Federal Title IV Financial Aid to allowable charges and for charges assessed within the academic year for which they were issued. Students can authorize NEOMED Financial Aid and Bursar (Accounting Office) to utilize Federal Title IV Financial Aid to:
- (a) Cover non-allowable charges that may be assessed to a student's account. Non-allowable charges include, but are not limited to, parking violations, , printing allowances, and health insurance. This authorization does not apply to instructional and mandatory fees for non-degree programs or elective/coursework not required for a degree conferral in eligible programs that are ineligible for Title IV Financial Aid, as well as late fees and non-sufficient fund returns assessed to the university when direct deposit funds are returned due to a designated account being closed.

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(b) Use Financial Aid to cover a balance from a previous academic year, up to \$200.00.

- (iii) FERPA Release – Federal regulations prohibit the Office of Financial Aid to discuss detailed account information with anyone other than the student. A student can designate individual(s) to contact the Office of Financial Aid to discuss matters regarding their Financial Aid. Designee(s) will be required to confirm personally identifiable information of the student before office personnel will release information.
- (iv) Title IV Financial Aid Annual Student Loan Acknowledgment – students are encouraged to complete an online counseling session that allows students to see how much they have borrowed and preview an estimate of their monthly payment. Annual Student Loan Acknowledgment can be completed online at [studentaid.gov](http://studentaid.gov). Confirmation of completion will be sent securely to NEOMED by the Department of Education.

**(G) VERIFICATION AND FILE REVIEW**

- (1) All student Financial Aid applications will be reviewed for accuracy through a process called “file review.” FAFSA applications may also be randomly selected for a more robust review through a process called Federal Verification. Depending on the method of selection, students may be expected to submit supporting documentation to confirm the information placed on the FAFSA or to resolve conflicting information that may exist between the FAFSA and supplemental application data. There are three types of Verification:
  - (a) Federally Selected – The U.S. Department of Education will randomly select a population of students enrolled at an institution of higher

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education to be reviewed through a formal Verification process. Students federally selected will be assigned into a grouping and will be instructed by NEOMED on additional documents that are needed. Students will not be eligible for Federal Title IV Financial Aid, HRSA Funding under Title VII, and NEOMED-Based Financial Aid until federal Verification documents are submitted and the Office of Financial Aid has reviewed and made necessary corrections to the student's FAFSA.

- (b) Institutionally Selected – Institutions of higher education can randomly select any Financial Aid application to be Verified prior to awarding Financial Aid. Examples can include, but are not limited to: conflicting information of application materials or being provided unsolicited tax documents. NEOMED reviews all applications for accuracy. Items that are Verified are based on the types of aid a student is seeking.
  - (i) Federal Title IV Financial Aid Recipients - Items verified include, but are not limited to: degree seeking, year in college, seeking a graduate/professional degree.
  - (ii) HRSA Funding and NEOMED-Based Financial Aid – Items Verified include, but are not limited to: desired degree, year in program, seeking a graduate or professional degree, adjusted gross income, income taxes paid, IRA deduction, educational credits, household size, number in college, tax deferred pensions.
  - (iii) Students who have had their Title IV Financial Aid Federal Verification completed can receive Federal Title IV Financial Aid without the completion of HRSA and NEOMED-Based Financial Aid Verification/file review; students will not be eligible for HRSA Funding or NEOMED-Based Financial Aid until Verification is complete.

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(c) Student Aid Report ("SAR") Comment Codes – Students may be required to submit additional documentation to the Office of Financial Aid if they have certain SAR codes listed on their FAFSA. Unresolved Comment Codes will prevent the Office of Financial Aid from issuing a Financial Aid offer. Comment Codes include, but are not limited to: citizenship status, conflicting information, selective service registration, unusual enrollment history, or default status on a Title IV Financial Aid Direct Loan or Perkins Loan. Students whose SAR has a listed Comment Code may be contacted by the Office of Financial Aid with instructions on how to resolve their specific issue. Required resolution to Comment Codes is completed in accordance with the U.S. Department of Education guidance published annually.

(2) Submission Timeline

(a) Application Cycle - The application cycle for the upcoming academic year varies depending on the type of Financial Aid a student is requesting. Application cycles are as follows:

(i) Title IV Financial Aid – Students may apply for federal student loans starting October 1 prior to the start of the academic year, and until shortly before the end of the academic year in which funding is needed. For example, the 2024-2025 application is available beginning on October 1, 2023 and must be received by the end of the 2024-2025 academic year. The ability of the Office of Financial Aid to process a late request for Title IV Financial Aid Funding is heavily dependent on the length of time it takes for the central processor to process a FAFSA, whether the student is selected for Federal Verification, the accuracy of FAFSA data, the amount of time needed to resolve any SAR C-Flags or Comment Codes as required by the U.S. Department of Education, and the ability of

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the Office of Financial Aid to turn-around a late request for Financial Aid.

(ii) HRSA Funding and NEOMED-Based Financial Aid

(a) Professional Students

(i) Continuing students and incoming students from a partner program: Applications are accepted starting October 1 prior to the start of the academic year, and until March 1 for priority consideration. Consideration will not be extended to students who submit applications after the March 1 priority deadline.

(ii) Newly Admitted Students– Applications are accepted starting October 1 prior to the start of the academic year, and until March 1 for priority consideration if admitted to NEOMED prior to March 1<sup>st</sup>. For students admitted after March 1<sup>st</sup>, students can apply for consideration by submitting documents by the first day of classes to be added to a waitlist.

(b) College of Graduate Studies

(i) For Summer and Fall enrollment

(A) Continuing and newly admitted dual enrolled students applications are accepted starting October 1 prior to the start of the academic year, and until March 1 for priority

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consideration. Consideration will not be extended to students who submit applications after the March 1 priority deadline.

- (B) Newly admitted, non-dual enrolled students – applications are accepted starting October 1 prior to the start of the academic year, and until March 1 for priority consideration if admitted to NEOMED prior to March 1<sup>st</sup>. For students admitted after March 1<sup>st</sup>, students can apply for consideration by submitting documents by the first day of classes to be added to a waitlist.

(ii) For Spring Term Enrollment

- (A) Newly admitted, non-dual enrolled students must submit their application materials by the first day of classes for consideration.

(3) Submitting Forms

- (a) The FAFSA, Title IV Financial Aid Direct Loan promissory notes, loan counseling, and annual student loan acknowledgment are each completed on the [Federal Student Aid website](#). Upon successful completion of the forms, NEOMED will securely receive electronic confirmation and the information will be uploaded to the student information system.
- (b) Institutional forms are completed online through the Student Self-Service portal. Students are required to use their credentials to log in and securely complete the information. Unless otherwise directed, supporting documentation will not be accepted if transmitted to NEOMED via

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unsecure email. NEOMED utilizes a secure document upload for students to transmit documentation that contains personally identifiable information through Student Self-Service. In rare circumstances, documents may need to be hand-delivered or sent to the Office of Financial Aid via USPS.

- (c) NEOMED Foundation Loan and HRSA Loan Promissory Notes are completed online on RSign. Students will receive a direct link to electronically complete and sign their promissory note. A copy of the note will be securely emailed to both the student and the Office of Financial Aid. A student can request a paper promissory note in lieu of an electronic promissory note by contacting the Office of Financial Aid.
- (4) Misrepresentation of Application Materials
  - (a) Financial Aid applicants are advised that personnel in the Office of Financial Aid must and will refer to the Office of Inspector General any credible information indicating that an applicant for Financial Aid may have engaged in fraud or other criminal misconduct in connection with FAFSA applications. Common misconduct includes false claims of citizenship, use of false identities, forgery of signatures of certifications, and false statements of income. Note that fraud is the intent to deceive as opposed to a mistake on an application. In addition, personnel in the Office of Financial Aid will also refer students to either their college's respective admission committee (for incoming students) or the NEOMED Student Conduct Council (for continuing students) for potential recension of admission or disciplinary action.
- (5) The policy of NEOMED is to comply with applicable Federal and state nondiscrimination and equal opportunity laws, orders, and regulations. As such, NEOMED's Office of Financial Aid is committed to providing equal opportunity and access to financial aid free from discrimination based on race, color, religion,

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<b>ACADEMIC POLICY TITLE:</b> Financial Aid Eligibility, Application, and File Verification Policy	<b>EFFECTIVE DATE:</b> May 1, 2021 <b>REVISED AND UPDATED:</b> May 23, 2024
<b>RESPONSIBLE DEPARTMENT:</b> Office of Financial Aid	<b>APPROVAL AUTHORITY:</b> <b>Office of the Provost and Senior Vice President for Academic Affairs</b>

national origin, ancestry, disability, age, sex, sexual orientation, gender identity, age, marital status, military status, or veteran status in the administration of financial aid.