



Chapter 10

Financial Aid Policy and Procedures

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10.001 - Financial Aid Mission Statement

The Eastern Oklahoma State College (Eastern) Financial Aid office is committed to taking a proactive role in supporting the recruitment, retention, and academic success of our student population. The latest technology will be used to inform prospective and current students of the resources and services available to them to secure funds for financing their education. We will advise students of their eligibility for financial assistance in a timely manner and educate them about the financial and academic responsibilities associated with the receipt of that aid.

Our goal is to ensure the delivery of student aid funds is conducted accurately, expeditiously, and with integrity. We will treat all students with care and respect and at all times maintain the confidentiality of personal information of our students and their families.

Forms and Materials

All financial aid forms are available on Eastern's financial aid website. Also, a link for the FAFSA and Direct Loan Master Promissory Note are available on our website.

10.002 – Satisfactory Academic Progress (SAP) Procedure

The Financial Aid Office of Eastern Oklahoma State College administers student financial aid programs from federal and state sources. The U.S. Department of Education (DOE) requires schools to develop and implement policies by which academic progress is evaluated and monitored. Federal regulations (CFR 668.34) require Eastern to follow a policy to measure if a student receiving Title IV aid is making satisfactory academic progress toward a degree or certificate. Eastern will evaluate students' Satisfactory Academic Progress (SAP). Eastern evaluates progress at the end of each semester. Every student's progress is measured at each evaluation as follows:

- Qualitative Progress (GPA requirement)
- Quantitative Progress (Time-based)

These criteria evaluate: the quality and quantity of the academic work students complete and progress toward completion of an academic program. The satisfactory academic progress requirements listed below are minimum standards. Students are encouraged to exceed all the requirements whenever possible.

This policy indicates the standards used to measure Satisfactory Academic Progress (SAP) at Eastern for purposes of financial aid eligibility. Funds affected by this policy include all applicable federal, state, and college funds including but not limited to Federal Pell Grant, Federal Supplemental Education Opportunity Grant (SEOG), Federal Direct Loans, Federal Direct PLUS (Parent) Loans, Federal Work Study, State Scholarship (OHLAP) and Grant (OTAG) programs.

The criteria contained in the policy are applied to all eligible degrees and certificate seeking students. Students who do not meet the requirements of the policy are notified by email sent to the student's Eastern student email account and by regular mail.

Students who fail to make Satisfactory Academic Progress are initially given a warning period during which time they may continue being awarded aid (if otherwise eligible). Students who do not meet the requirements by the end of the warning period are denied future financial aid and considered suspended. A student may appeal against the suspension of financial aid due to exceptional circumstances. Exceptional circumstances may include but are not limited to illness, death of an immediate family member, or traumatic events in the student's life.

10.003 – Requirements for Satisfactory Academic Progress

Qualitative Progress Requirement

Students' cumulative Eastern grade point average (GPA) will be evaluated each semester. In order to meet graduation requirements for all students and programs, a cumulative 2.0 GPA is considered making SAP.

Quantitative Progress Requirement

At the end of each semester, a student must have satisfactorily completed two-thirds (2/3) of cumulative attempted hours, including transfer credits. Note: Attempted credit hours are those courses for which any grade appears on the student's transcript, including transfer credits, remedial courses, withdrawn courses, and repeated courses.

Maximum Time Frame Requirement

Students must progress through their program to ensure that they will graduate within the maximum timeframe. Eastern calculates the pace at which a student is progressing by dividing the total number of hours the student has successfully completed (including transfer credits) by the total number he/she has attempted. A student is ineligible for financial aid when it becomes mathematically impossible for him/her to complete his/her program within 150% of its published length.

The maximum timeframe for which an undergraduate student may receive financial assistance may not exceed 150% of the published length of the student's academic program measured in credit hours, whether or not federal aid was received by the student during this time.

For instance, if the published length of an academic program is 64 credit hours, the maximum time frame during which the student will be eligible to receive financial aid must not exceed 96* credit hours, note this will include transfer hours and prior learning credits that apply toward the degree. *64 credit hours X 150% = 96 credit hours.

10.004 – Course Completion for Satisfactory Academic Progress

Incompletes

An incomplete (I) grade may be given to a student who, because of illness or other unique circumstances, has not been able to complete a course in the prescribed amount of time. A

student receiving an “I” grade from an instructor will need to work with the instructor and Registrar regarding the terms of their “I” contract. The grade will be considered attempted but not completed until the “I” is removed and changed to a valid letter grade.

Repeated Courses

Students may receive financial aid for repeating courses. A student shall have the prerogative to repeat any course up to 4 attempts, including the initial attempt, to achieve a higher grade. Only the highest grade earned of the 4 attempts will be used in the calculation of the GPA. Any attempt after the first 4 attempts will be used in the calculation of the GPA. All attempts shall be recorded on the transcript with the earned grade for each course listed in the semester earned. Exceptions to the limit to the number of attempts may be approved at the discretion of the Vice President of Academic Affairs or his/her designee.

A student may retake for credit any course in which a grade of “D” or “F” has been earned.

Withdrawal from a Course

Courses that a student withdraws from after the refund period are considered in “hours attempted” toward the maximum time frame as well as in cumulative attempted hours used in calculating completion rate.

Transfer Credits

Transfer credit hours are subject to the Satisfactory Academic Progress measurements. Eastern Oklahoma State College calculates the pace at which a student is progressing by dividing the total number of hours the student has successfully completed (including transfer credits) by the total number he/she has attempted.

Changes in Major or Degree

Students who want to change their major or degree must contact their Eastern Advisor to request the change. The student is eligible to receive aid for no more than 150% of the credit hours required to complete the new program of study. The 150% limit is applied to all credit hours earned by the student while enrolled at Eastern Oklahoma State College, and includes transferred credits accepted from previously attended institutions.

10.005 - Consequences of Failure to meet SAP Requirements

Warning

The first time a degree/certificate seeking student fails to maintain satisfactory academic progress by the end of the semester, a warning period is automatically given. The student will receive an email of warning, and the student does not need to appeal. The student has this warning period to improve his/her standing so he/she can meet the requirements of this policy. During this warning period the student will receive financial aid through the regular process, assuming the student meets all other eligibility requirements. If after this warning period the student fails to improve enough to meet the satisfactory academic requirements, financial aid eligibility will be suspended.

Suspension of Aid - Appeal Process

A student who has had his/her financial aid suspended after a warning period because he/she is not meeting the requirements of this policy has the right to appeal. A student may appeal against the suspension of financial aid due to exceptional circumstances. Exceptional circumstances may include but are not limited to illness, death of an immediate family member, or traumatic events in the student's life. The student must provide supporting documentation to demonstrate the circumstance for not meeting the requirements of this policy.

Outcome of the Appeal can be:

- Aid continues to be terminated.
- The aid may be reinstated for a probation limited period of one (1) semester as determined by the Financial Aid Appeals Committee. The Financial Aid Appeals Committee makes the final determination.

Appeal Steps

Students who wish to appeal their termination of financial aid must complete the following steps:

1. Submit the Financial Aid Suspension Appeal Form and letter of request to the Financial Aid Appeals Committee.
2. Provide all required or requested documents, such as an updated plan of study provided by the academic advisor.
3. Provide supporting documentation with the appeal form, such as grade changes, medical documentation, or other materials supportive of the appeal.
4. The Appeal Form and all documents should be received at Eastern Oklahoma State College Financial Aid Office.

Appeal Deadline

File your appeal as early as possible but no later than one (1) week prior to the start date of classes each semester. Allow up to fourteen (14) days to process your appeal once received by the Eastern Financial Aid Office.

Notification of Appeal Determination

Students are normally notified in writing through the Eastern student email if their appeal for reinstatement of financial aid is approved or denied.

Student's responsibilities if appeal is granted

If a student's appeal is approved, he/she will be placed on Financial Aid Probation status. While on probation, the student may receive financial aid for one (1) semester.

To be eligible for aid for subsequent semesters, the student must meet the terms of the appeal. For all probation students this includes:

- Successfully completing all the courses attempted during the semester with no withdrawals from classes or a final grade of "F", "I", or "W" to increase their cumulative completion rate to meet standards.

- Increase cumulative GPA to 2.0 or higher after the Probation semester.
- Follow the academic plan that was submitted with their appeal.

Additional requirements may be listed on the appeal approval notice.

This policy was created and is maintained to be following Federal regulation 34CFR 668.34

10.006 – Aid Award Philosophy

Eastern Oklahoma State College's award philosophy reflects the use of electronics in receiving Institutional Student Information Records (ISIR), packaging of awards, and sending PELL payments.

ISIR's are downloaded from the Central Processing System (CPS) on a year-to-date order electronically. Thereafter, ISIR's will be downloaded at least once a week and more often depending on the amount coming in and peak periods. Corrections will be sent daily during peak periods and at least once a week in slow periods.

A tracking letter will be sent to each student who lists our school requesting information. This letter will explain that the Financial Aid department has received their ISIR and indicate documentation needed to process the file.

After all requirements for tracking and satisfactory academic progress have been met a student can be awarded Federal funds.

Financial Aid Awarding

Students will be awarded Pell Grant strictly by the Federal Student Aid Pell chart.

Students will be awarded Direct Stafford Loans when they have completed a Master Promissory Note, completed Entrance Counseling, and a Loan Request Form, in addition to all FAFSA requirements.

Students are awarded the Oklahoma Tuition Aid Grant (OTAG) by completing the FAFSA. Requirements are developed by the state and include being an Oklahoma resident and attending an Oklahoma school, receiving a Pell Grant, majoring in an area of study that leads to critical occupation employment, and making satisfactory academic progress.

Students are awarded Federal work-study based on eligibility and desire for student employment. Students will work less than twenty (20) hours a week at minimum wage.

In addition to grants, loans, and federal work-study, institutional scholarships, outside scholarships, WIA, Veterans Benefits, Tribal grants and scholarships, and other financial aid awards will be added to the student's awards as received. Financial Aid will be awarded for the maximum amount possible depending on the student's need and the availability of funds.

Whenever possible, the student will be awarded all waivers, grants, and scholarship aid first, followed by employment and then loans.

Award amount of student eligibility is based upon the result of a need analysis subject to limitation of fund maximums.

All students will be awarded based upon enrollment as of the official enrollment date, which falls at the end of the drop period.

In all cases, when a reduction of previously awarded aid is required because of receipt of scholarship or other change, the student's aid will be repackaged by reducing or eliminating loans when possible before adjusting employment or scholarships.

The Financial Aid office will strive to assist students in applying for financial aid from local, state, and federal government organizations, and to provide students with general advisement regarding the application process. The Financial Aid Office will assist students in securing on-campus employment and provide information about additional sources of assistance when possible.

10.007 – Misrepresentation Policy

Eastern Oklahoma State College is prohibited under federal regulations (34 CFR 668.71, 668.72, 668.73, 668.74, CDL GEN-11-05) from making any false, erroneous, or misleading statement directly or indirectly to a student, prospective student, general public, accrediting agency, state agency, or to the U.S. Department of Education.

Eastern Oklahoma State College strives to provide accurate, honest and clear information in print, online, broadcast media or oral presentations. Eastern will not provide any false, erroneous, or misleading statements to a student, prospective student, general public, accrediting agency, state agency or to the U.S. Department of Education.

A misleading statement includes any statement that has the likelihood or tendency to deceive or confuse. A statement is any communication made in writing, visually, orally, or through other means.

Misrepresentation is defined as any false, erroneous or misleading statement made by an institution or one of its representatives directly or indirectly to a student, prospective student, family of either, accrediting agency, state agency, any members of the public, or the U.S. Department of Education. This includes the dissemination of a student endorsement or testimonial given under duress or because the institution required the student to provide the endorsement to participate in a program Federal regulations further provide that substantial misrepresentation is any misrepresentation on which the person to whom it was made could reasonably be expected to rely, or has reasonably relied, to that person's detriment.

The regulatory provisions describe misrepresentation by Eastern, one of its representatives, or other related parties with respect to:

- The nature of an institution's educational programs
- The nature of an institution's financial charges
- The employability of an institution's graduates
- Relationship with the U.S. Department of Education.

A Title IV eligible institution, its representatives, or any organization or person with whom the eligible institution has an agreement may not describe the eligible institution's participation in the Title IV, Higher Education Act programs in a manner that suggests approval or endorsement by the U.S. Department of Education of the quality of its educational programs.

Procedures

Eastern prohibits the use of statements that tend to misrepresent academic programs or related admissions and financial aid procedures.

The Director of Marketing and Communications is responsible for ensuring all promotional materials, print and electronic advertisements, videos and other marketing materials are accurate, honest and clear. Electronic copies of all materials will be archived in the Office of Marketing and Communications.

The Vice President of Academic Affairs is responsible for the training of employees under his/her supervision regarding misrepresentation of the following areas:

- admissions requirements
- accreditation status
- transfer of course credits
- requirements for successfully completing the course of study or program
- the institution's size, location, facilities or equipment
- programs as they relate to employability
- the number, availability and qualifications, including the training and experience, of faculty
- availability of tutorial or specialized instruction, guidance and counseling
- nature or extent of any prerequisites established for enrollment
- degree, diploma, certificate of completion that the student is awarded up on completion of the course of study
- placement or employment services
- knowledge about current or likely future employment conditions, compensation, or opportunities

The Vice President of Business Affairs and the Director of Financial Aid is responsible for the training of employees under their supervision regarding misrepresentation of the following areas:

- financial assistance including financial aid, scholarships, loans
- tuition and fees
- refunds if a student does not complete a program

Disciplinary Action

Any violation of this policy will be taken seriously and Eastern will ensure that it is not repeated. Any employee's conduct resulting in disciplinary actions from misrepresentation activity will be documented in the Office of Human Resources and maintained in the employee's personnel file. Any Eastern employee who violates this policy may be subject to disciplinary action up to and including termination. Concerns about possible misrepresentation may be reported to the Vice President of Academic Affairs or the Vice President of Business Affairs.

10.008 – Gainful Employment Policy

Eastern Oklahoma State College will publicly make available the following information for prospective students on the institution's website and program-specific promotional materials for each of its "Gainful Employment" programs, as designated by the U.S. Department of Education. Eastern will use the disclosure form issued by the U.S. Department of Education to provide the information.

- The name and U.S. Department of Labor's Standard Occupational Classification (SOC) code of the occupations that the program prepares students to enter, along with links to occupational profiles on the U.S. Department of Labor's ONET Web site or its successor site.
- The on-time graduation rate for students completing the program.
- Normal time to complete the program (in weeks, months or years).
- The tuition and fees the institution charges a student for completing the program within the normal time.
- The typical costs for books and supplies (unless those costs are included as part of tuition and fees), and the cost of room and board, if applicable.
- The job placement rate for students completing the program, if required by the state or accreditor.
- The median loan debt incurred by students who completed the program (separately by Title IV loans, private loans, and institutional debt).
- Other information the U.S. Department of Education provided to the institution about the program.

10.009 – GED Availability Statement

After July 1, 2012, students seeking federal financial aid at Eastern Oklahoma State College must have a high school diploma or GED. If a student does not have a high school diploma or GED, they can be directed to the following location for information about the GED training program:

McAlester Adult Learning Center

2801 N. A. Street
McAlester, OK
Phone: 918-423-4008

Idabel Adult Learning Center
1203 SE Quincy Street
Idabel, OK
Phone: 580-286-3056

10.010 – Financial Aid Programs Available at Eastern

Federal programs

- Federal Pell Grant
- Federal Supplemental Educational Opportunity Grant (SEOG)
- Federal Work Study Program (FWS)
- Federal Direct Student Loan Program (DL)

State programs

- Oklahoma's Promise
- Oklahoma Tuition Aid Grant (OTAG)
- Other state scholarships

Financial Aid Processing

All financial aid programs at Eastern are processed based on the student's completed FAFSA, unless they are not a needs-based award, such as a merit-based award or an outside scholarship. In that case, they can be awarded without a completed FAFSA. The process for awarding aid is as follows:

- The financial aid office electronically receives students' Institutional Student Information Records (ISIR's).
- Students are then sent a tracking letter stating information that is needed to start completing their file to process aid.
- If corrections are needed on the ISIR the financial aid office makes them electronically as part of the verification process. A student may also return their corrections to the processor themselves.
- If the ISIR states that the student is in default at a previous institution from receipt of Title IV funds, or in default on a student loan, no further aid from Title IV can be given. The student must arrange repayment and be cleared by the other institution(s).
- Academic transcripts from all previous post-secondary institutions must be received prior to receiving aid to measure Satisfactory Academic Progress.
- Satisfactory Academic Progress is figured on all students. Students not eligible to receive federal funds due to ineligibility status will be notified by mail or email (Using their Eastern email account).
- Pell awards should never exceed the total scheduled award. Amounts on PELL annual payment charts are for full-year awards and must be divided by two (2) semesters.

- An award letter is generated stating Pell eligibility to students meeting all requirements. Other awards the student has received are also included in the award letter. Students are able to review this award letter in their Self-Service account.

Students must provide necessary information to verify and complete their financial aid file by the last day of the academic year in which they apply. If a student fails to provide the information necessary to verify their application, Title IV aid cannot be awarded. It is ultimately the student's responsibility to return the requested information for verification purposes. If a student does not respond to the letter and email request for further information, no further action can and will be taken.

Rights and Responsibilities of Students Receiving Financial Assistance

You have the right to receive the following information from the College:

- Information on financial assistance that is available, including information on all federal, state, local, private and institutional financial aid programs.
- Information on the procedures and deadlines for submitting applications for each available program, grant and/or scholarship.
- Information on how the College selects financial aid recipients.
- Information on how the College determines your financial need.
- Information on how the College determines each type and amount of assistance in your financial aid package (award letter).
- Information on how and when you will receive your aid.
- Information on how the College determines whether you are making satisfactory academic progress (SAP), and the consequences if you are not.
- Information on your federal work study job, including the job description, hours of work, what your duties will be, what the rate of pay will be, and how and when you will be paid.
- Information on the location, hours, and counseling procedures of the Financial Aid Office.
- You may gain access to any of the above information online via the College website or by requesting the information directly from the offices.

As a financial aid student, you must accept the following responsibilities to ensure that your aid is processed correctly and that you know what consequences may arise if you fail to complete your course work or withdraw from school or classes:

- You must complete your admissions application and the Free Application for Federal Student Aid (FAFSA) and submit them on time to the correct addresses.
- The FAFSA must be completed online and be received no later than March 1 (our priority deadline date) if you wish to receive your maximum eligible aid package.
- We will continue to process aid applications after March 1, however, Supplemental Educational Opportunity Grant (SEOG), Oklahoma Tuition Aid Grant (OTAG-state grant) and Federal Work Study funds may be exhausted by the time late applications are received.

- New students should complete and submit admissions applications in the November/December time frame so that when their information is received, their aid package (award letter) can be processed in a timely manner.
- You will not receive a financial aid award letter until you are admitted to the College.
- You must be making satisfactory academic progress (SAP) toward a degree objective in order to be eligible to receive financial aid at Eastern.
- You must submit accurate and complete information in your FAFSA application and in any other documents or forms requested. Reporting inaccurate and/or incomplete information will delay the processing of your aid or result in a penalty being assessed by the federal government.
- You must complete and return all other documents, verification forms, and reports requested by the Financial Aid Office with corrections and/or new information.
- You are responsible for reading and understanding all applications, reports, letters and forms that you are asked to sign, and keeping copies of them.
- You must accept responsibility for all agreements that you sign with the federal government and the College.
- You must perform the work that is agreed upon in the contract if you sign a work study contract.
- You must be aware of the College's withdrawal and refund policies and procedures and know the consequences of withdrawing from classes or school. This information is extremely important as, under certain circumstances, you could find yourself owing the College an unpaid balance or having to repay federal funds refunded to you.

10.011 – Institutional and Program Eligibility

Eastern Oklahoma State College has been authorized by the U.S. Secretary of Education to participate in federal financial aid programs authorized by Title IV of the Higher Education Act of 1965 as amended. Eastern is authorized to administer these programs for two-year degree programs as well as non-degree programs listed in the Eligibility and Certification Approval Report.

The Program Participation Agreement between Eastern Oklahoma State College and the U.S. Department of Education is maintained in the Financial Aid Director's office and allows the Financial Aid Office to participate in the following operative Title IV programs:

- Federal Pell Grant Program
- Federal Direct Student Loan Program
- Federal Supplemental Educational Opportunity Grant Program
- Federal Work-Study Program
- Iraq and Afghanistan Service Grant

Education and Certification Approval Report

The Director of Financial Aid is responsible for the timely and complete submission of the Eligibility and Certification Approval Report (ECAR) to the Department of Education.

Eastern Oklahoma State College will report to the U.S. Secretary of Education the following changes no later than ten (10) days after the change occurs:

- Institution name change or name change of a branch or location
- Institution address or address change of a branch or location
- The establishment of an accredited and licensed location which will offer 50 percent or more of an educational program
- A change in the way program length is measured
- A decrease in the level of program offering
- A new President or CFO of the institution
- A new Title IV Financial Aid Administrator
- The closure of a branch of location
- The governance of the institution
- Establishing or reestablishing eligibility of a gainful employment program
- Discontinuing a gainful employment program
- Ceasing to provide a gainful employment program for a consecutive twelve (12) month period
- Losing program eligibility or gainful employment program
- Changing the name, CIP code, or credential level of a gainful employment program

10.012 – Title IV & Military Tuition Assistance Refunds

Definition of Withdraw

A student is considered to have withdrawn if the student does not complete all the days in the period of enrollment that the student was scheduled to complete.

Official Withdrawal Process

A student wishing to withdraw from college must initiate withdrawal procedures no later than the 10th week of the semester, in the Enrollment Management Office. Completed withdrawal forms and final processing will be performed in the Registrar's Office.

Institutional Refund Policy

Refunds of fees paid will be 100% during the Drop/Add period at the beginning of each semester. Drop/Add which reduce the total fees paid will be refunded to the student. Total withdrawals during the Drop/Add period will provide a 100% refund of fees paid.

Withdrawals after the Drop/Add period will require 100% payment of all fees for the withdrawal to be processed. Refunds will not include non-refundable fees. Title IV recipients are exempt from this policy and will have refunds calculated according to the prescribed "Return of Title IV Funds" regulations.

Establishing Last Date of Attendance

For students who officially withdraw, the date of beginning the official withdrawal process will be considered the student's last date of attendance for calculation purposes. For students who do not officially withdraw, the last date of attendance documented by their instructors will be used.

If no last date of attendance is documented, it is assumed that the student attended 50% of the enrollment period. Students who do not earn any passing grades, and have a combination of I, W, NP, AW or F grades, are considered to be “unofficial withdrawals”. Students who officially withdraw and students who unofficially withdraw will be subject to the R2T4 requirements when receiving Title IV funds.

A student receiving federal financial assistance who completely withdraws from classes at Eastern will be subject to the Return of Title IV (Federal) Funds (R2T4) as required by the Federal Student Handbook. The policy only applies to federal financial aid received by the student.

Financial Aid is returned in the following order:

- Federal Direct Unsubsidized loans (other than PLUS loans)
- Federal Direct Subsidized loans
- Federal Direct PLUS loans
- Federal Pell Grants
- Federal Supplemental Education Opportunity Grant (SEOG)
- Any other Federal (Title IV) program

This policy assumes a student “earns” his/her financial aid based on the period of time the student remains enrolled through the semester. Upon withdrawal, the Financial Aid Office will determine the date of the student’s withdrawal on record in the Office of the Registrar and will calculate the amount of financial assistance the student “earned” while enrolled in classes according to the following formula:

Number of Calendar Days Enrolled Divided by Total Number of Calendar Days in the Semester (excluding breaks of at least five days)

A student, who completely withdraws at or before 60% of the term, may have to return a portion of their unearned federal financial aid. They may owe tuition, fees or a repayment of federal funds. A Return of Title IV Funds calculation determines the percentage of financial aid students have earned. This is based on the number of calendar days students attended, divided by the number of calendar days in the enrollment period.

For example, if a student completed 20% of the payment period, they earn 20% of the federal funds that they were originally scheduled to receive. A student that has not completed 60% of the term may have to return a portion of their unearned financial aid. In order to determine the amount of the semester a student completed; the Return of Title IV Funds calculation will use the student’s last date of attendance. For students who officially withdraw, the date of withdraw will be considered the student’s last date of attendance for calculation purposes.

For students who do not officially withdraw, it is assumed that the students attended 50% of the enrollment period, unless otherwise documented by their instructors. Students who do not earn any passing grades, and have a combination of I, W, NP, AW or F grades, are considered to be

“unofficial withdrawals”. Their federal aid eligibility will be recalculated as described in this policy.

Eastern Oklahoma State College must return funds, based on calculations, up to the total net amount from each source, in the following order:

- Unsubsidized Federal Direct Loan
- Subsidized Federal Direct Loan
- Parent Loans for Undergraduate Students (PLUS)
- Pell Grant
- Federal SEOG
- Any other Title IV programs

The return of funds must be completed no later than 45 days after the date the school determined the student withdrew. The school will return the lesser amount of the aid to be returned, as compared to the institutional charges, multiplied by the percentage of unearned aid. The student may also be responsible for returning a percentage of unearned financial aid. This amount will be the difference between the amount of Title IV aid due from school, and the amount of Title IV aid to be returned. Any federal grant funds that a student is required to repay will be returned to the Department of Education by the institution, on the student’s behalf. The student will return any unearned loan amounts in accordance with the terms of the promissory note. The student will be responsible for paying any unpaid charges incurred by the institution having to return Title IV funds. These will be billed through the Business Office.

Post-Withdrawal Disbursement

If the student did not receive all of the funds earned, he/she may be due a post-withdrawal disbursement. If the post-withdrawal disbursement calculation indicates that a post withdrawal disbursement is due from grant funds and the student has outstanding institutional charges, the funds are automatically applied to the student’s account. If the calculation indicates that a post-withdrawal disbursement is due from loan funds, the student/parent is sent a letter notifying him/her of the amount available. The student/parent is asked to return the letter within fourteen (14) days indicating whether he/she wishes to receive the aid and if so, the amount.

Eastern Oklahoma State College may not make a Post-Withdrawal Disbursement to the account or estate of a student who is deceased. Also, a student's estate is not required to return any Title IV funds.

Notification

Letters are mailed to all students and parents (Parent Loans for Undergraduate Students only) any time aid is returned because of the R2T4 calculation. The letters are mailed to the students’ permanent address.

School and Student Responsibility for Return of Unearned Federal Funds

The students and the school are both responsible for returning unearned federal financial aid to the federal government. The student will be billed for any amount due because of the return of federal aid funds (R2T4) calculation.

Direct Loans

When Eastern must return Direct Loans, those will be returned directly to the Department of Education on behalf of the borrower. Any loan funds that the student must return, the student will (or the parent for a Direct PLUS Loan) repay in accordance with the terms of the promissory note. That is, the student or parent will make scheduled payments to the holder of the loan over a period of time.

The Direct Loan recipient must also complete Exit Counseling upon withdrawal.

Procedures for the Return to Title IV Funds

No-Shows

Instructors will confirm the accuracy of their class roster and turn in no-shows to the office of the Vice President of Academic Affairs by the end of the third (3) week of the semester. The Registrar's Office will remove the non-attending students from their classes and their charges will be removed.

The Financial Aid Office will remove awards for any student marked as a no-show.

Official Withdrawals

The student picks up an Official Withdrawal Form from the Registrar's Office.

The student receives the required signatures from each office needed.

The Financial Aid Office instructs the student to complete Exit Counseling online and informs the student there may be a return of financial aid owed due to the withdrawal.

The R2T4 calculation is performed by the Financial Aid Office in the Ellucian Colleague system. For comparison, a manual R2T4 provided by the Department of Education is randomly completed.

The Financial Aid Office makes the award adjustments. The Business Office will return the required funds back to G5.

A copy of the R2T4 printout is placed in the student's file. If the student has any returns, a letter is mailed to the student's permanent address notifying the student of the amount(s) owed, and a copy is placed in the student's file.

The Financial Aid Office will also run a total withdrawal report every two (2) weeks from the beginning of the semester through the last date to withdraw and run the R2T4 process for any student who did not already submit an official form to the Financial Aid Office for signature.

Unofficial Withdrawals

At the end of the semester, the Financial Aid Office will run a report of all students that earned a 0.00 grade point average (GPA). Financial Aid officers will determine if they earned this GPA because they have a combination of W, I, AW, or F grades.

The Financial Aid Office will run the R2T4 calculation in the Ellucian Colleague system for any Title IV recipient appearing on the report, using the last date of attendance as reported by instructors, or 50% if there is no last date of attendance provided. For comparison, a manual R2T4 provided by the Department of Education is randomly completed.

The Financial Aid Office makes the award adjustments. The Business Office will return the required funds back to G5.

A copy of the R2T4 printout is placed in the student's file. If the student has any returns, a letter is mailed to the student's permanent address notifying the student of the amount(s) owed, and a copy is placed in the student's file.

Military Tuition Assistance

A student who officially or unofficially withdraws from a course at or before 60% of the term, may be required to return a portion of their unearned Military Tuition Assistance. Students may owe tuition, fees, or a repayment of the tuition assistance. A return of Military Tuition Assistance funds calculations determines the percentage of funds the student has earned. This is based on the number of calendar days the student has attended, divided by the number of calendar days in the enrollment period. For students who officially withdraw, the date of withdraw will be considered the student's last day of attendance for calculation purposes. For students who do not officially withdraw, it is assumed that the students completed 50% of the enrollment period, unless otherwise documented by their instructor. The return of Military Tuition Assistance funds must be completed no later than 45 days after the date the school determined the student withdrew. The school will return the lesser amount of aid to be returned, as compared to the institutional charges, multiplied by the percentage of unearned aid. If a student stops attending due to a military service obligation and they notify Eastern of the obligation, the College will work with you to identify possible solutions that will not result in a debt for the returned portion.

10.013 – Financial Assistance Verification

To apply for federal financial aid, a student submits a Free Application for Federal Student Aid (FAFSA) to the Central Processing System (CPS). Because students sometimes make errors on their application, there is a process for verifying applications and making corrections.

Eastern has established and uses written policies and procedures for verifying an applicant's FAFSA information.

Selection of Applications to be Verified

The Financial Aid Office will verify all financial aid applications flagged for verification by the U.S. Department of Education

The Financial Aid Office will verify any financial aid application that appears to contain incorrect information.

NOTE: Federal regulations stipulate that an institution may require an applicant to verify any FAFSA information that it specifies. On occasion, the College may therefore require a student to verify any FAFSA information and to provide any reasonable documentation.

Verification Exemptions

Eastern may not complete verification on these applicants, but in case of conflicting information, only a deceased student would be exempt.

- Death of a student
- Not an aid recipient
- Eligible for only unsubsidized student financial assistance
- Applicant verified by another school
- Post enrollment after all disbursements have been made

Further, unless Eastern has reason to believe that the information reported by a dependent student is incorrect, it will not verify the applicant's parents' FAFSA information if:

- the parents are residing in a country other than the United States and cannot be contacted by normal means of communication;
- both parents or the custodial parent has died;
- the parents cannot be located because their contact information is unknown and cannot be obtained by the applicant; or
- both of the applicant's parents are mentally incapacitated.

Lastly, unless Eastern has reason to believe that the information reported by an independent student is incorrect, it will not verify the applicant's spouse's information if:

- the spouse is deceased;
- the spouse is mentally incapacitated;
- the spouse is residing in a country other than the United States and cannot be contacted by normal means of communication; or
- the spouse cannot be located because his or her contact information is unknown and cannot be obtained by the applicant.

IRS Data Retrieval Tool (DRT): The IRS DRT is the fastest, easiest and most secure method of meeting verification requirements. To verify tax data, the U.S. Department of Education and the College encourage students and parents to use the IRS DRT to import data from their tax return directly to the FAFSA, either at the initial FAFSA filing or through the FAFSA correction process. For the retrieved data to be acceptable documentation of tax data, it is necessary that neither the student nor the parents change the data after it is transferred from the IRS.

IRS Tax Return Transcript

If a student or parent cannot or will not use the IRS DRT, they must provide a transcript obtained from the IRS that lists tax account information for the academic year being requested.

Requesting a Tax Return Transcript

A student or parent may request an IRS Tax Return Transcript from the IRS, free of charge, in one of the following ways:

- online by downloading an immediate PDF
- by mail after submitting an online request
- by submitting a telephone request by calling 1-800-908-9946
- by mail after submitting a paper request form (IRS Form 4506T-EZ or IRS Form 4506-T)

Victims of Identity Theft

When the IRS determines whether a tax filer has been or likely was a victim of identity theft, it will not allow him/her to use the IRS DRT process or get a tax return transcript until the matter has been resolved, which can take up to a year for complex cases. For a tax filer who is a victim of identity theft, the college will accept for verification:

- a Tax Return DataBase View (TRDBV) transcript obtained from the IRS by calling the IRS's Identity Protection Specialized Unit (IPSU) toll-free number at 800-908-4490; and
- a statement signed and dated by the tax filers indicating that they were victims of IRS tax-related identity theft, and that the IRS has been made aware of the tax-related identity theft.

Filing an Amended Return

A student or parent who files an amended return cannot use the IRS DRT process. Instead, he/she may submit to the Financial Aid Office:

- an IRS Tax Return Transcript (that will only include information from the original tax return and does not have to be signed), or any other IRS tax transcript(s) that include all of the income and tax information required to be verified; and
- a signed copy of the amended tax return (IRS Form 1040X) that was filed with the IRS.

On occasion, the college may also require that the student or parent submit an IRS tax account summary.

Tax Filing Extensions

A student or parent who has been granted a tax filing extension must provide a copy of IRS Form 4868, Application for Automatic Extension of Time to File U.S. Individual Income Tax Return.

Foreign Tax Filers

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

Non-filers

A student or parent who is not required to file a U.S tax return is required to submit the Eastern Verification Worksheet and copies of all IRS W-2 Forms to verify income earned from work. If

an individual who is required to submit an IRS W-2 Form is unable to obtain one in a timely manner, the College may permit that individual to provide a signed statement that includes:

- the amount of income earned from work;
- the source of that income; and
- the reason that the IRS Form W-2 is not available in a timely manner.

If the College questions a claim that the tax filer has not, will not, and is not required to file a IRS income tax return, Eastern will require the applicant to submit a “Verification of Non Filing Letter” from the IRS that the tax filer did not file a IRS income tax return. The request for “Verification of Non-Filing Letter” can be obtained by the tax filer requesting an IRS Tax Return Transcript as outlined above.

Deadlines and Failure to Submit Documentation

A student whose FAFSA information has been selected for verification must submit all documentation required for verification to the Financial Aid Office within fourteen (14) days. If a student does not submit all documentation within fourteen (14) days, there will be a delay in his/her financial aid awards. No financial aid awards will be disbursed without complete verification.

For students selected for verification, the college must have verification documents and a valid output document no later than 120 days after the last day of enrollment or the final deadline for the aid year, whichever comes first.

For Direct Subsidized Stafford Loans, Direct Unsubsidized Stafford Loans, and Parent Loans for Undergraduate Students, borrowers must have all verification documentation complete as well as have a Master Promissory Note (MPN) completed and Entrance Counseling completed for first-time borrowers one week before the last date of each semester. If the student provides the documentation after the deadline, the college will reevaluate the student’s eligibility for aid and award aid based on the availability of federal funds at the time of document submission.

Correcting Errors on FAFSA Information

Upon receipt of their Student Aid Report (SAR), the student should review all information listed on the SAR and submit for processing any errors reported on the original FAFSA to the Central Processing System. For students selected for federal verification, students will be given links to the Eastern webpage, where Eastern Verification Worksheets can be found. Students (and parents) should print and complete the documentation and return it to the Financial Aid Office by U.S. mail, email, or fax.

If a student’s FAFSA information changes as a result of Eastern’s verification process, the college will:

- submit for processing changes to the FAFSA information determined to be in error;
- recalculate the student’s Federal Pell Grant based on the recalculated EFC;
- award the student’s financial aid package based on the recalculated EFC; and

- notify the student through an Award Letter in the Self-Service student portal of his/her financial aid package.

Note: Although the college will be able to submit most changes to FAFSA information, on occasion it may be necessary for the student to submit changes directly to the CPS. In such cases, the college will notify the student in writing (by U.S. mail or email) as to which data items must be corrected by the student and submitted for processing to the CPS.

Referral of Fraud Cases

Students and parents are advised that Eastern will refer to the Office of Inspector General (OIG) any credible information indicating that an applicant for Federal Student Aid may have engaged in fraud or other criminal misconduct in connection with FAFSA applications. Common misconduct includes false claims of independent status, 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.

10.014 – Conflicting Financial Aid Data

Discrepant tax data

Eastern Oklahoma State College expects Financial Aid Administrators (FAAs) to have a fundamental understanding of relevant tax issues that a layperson with basic tax law information can evaluate. Because conflicting data often involve such information, FAAs must have a fundamental understanding of relevant tax issues that can considerably affect the need analysis. FAAs are obligated to know:

- whether a person was required to file a tax return
- what the correct filing status for a person should be
- that an individual cannot be claimed as an exemption by more than one person. FAAs utilize Publication 17 of the IRS, Your Federal Income Tax, it can be viewed on the Web at www.irs.gov.

Resolution of conflicting information

Financial aid will not be disbursed until conflicting information has been resolved. Even if the conflict concerns a previous award year, FAAs will still investigate it. The matter is considered resolved when the FAA has determined which data are correct. FAAs will document the findings and explain why their decision is justified.

Applicants selected for verification – If Eastern has reason to believe that any information on the application used to calculate the EFC is discrepant or inaccurate (or if any supporting documentation is discrepant or inaccurate), Eastern requires the applicant to provide adequate documentation to resolve the conflict.

Applicants not selected for verification – Eastern resolves conflicting information regardless of whether or not the applicant was selected for verification. The Financial Aid Office reviews all

tax returns provided to the school even if they were not requested. All “C” Codes on the ISIR are reviewed and resolved by the financial aid office.

Other applicant information received by the school – Eastern has an adequate internal system to identify conflicting information that it may have regardless of the source. Staff in the Registrar’s Office, the Business Office and the Financial Aid Office work closely to ensure information that could impact the financial aid status of each student is provided and reviewed.

Procedures to identify and resolve discrepancies

Procedures to identify and resolve discrepancies in the information that the institution receives from different sources with respect to a student’s application for Title IV aid.

Eastern identifies all student aid applications, need analysis documents, Statements of Registration Status, and eligibility notification documents presented by or on behalf of each aid applicant. Eastern collects IRS Tax Return Transcripts for tax filers who did not utilize the IRS DRT (Data Retrieval Tool) within the FAFSA. For non-filers, the student and/or parent will mark their non-filing status on the verification worksheet and W-2 forms will be collected. In certain cases, when deemed necessary, a “statement of non-filing status” will be requested from a student or parent. This form is requested from the IRS website.

The Financial Aid Office uses a verification worksheet to retrieve data, depending on the student verification tracking group. If conflicting information can be determined from the worksheet, corrections will be made to remedy the incorrect data. At certain times, more information may be requested, and the student can turn in verification from an outside source to document the data element before corrections can be made to rectify the incorrect information. All conflicting information will be reviewed and resolved before the student file is considered complete and any awards are made.

The Financial Aid Office will review all ISIRS, even if the previous transaction was reviewed. All “C” flags and comment codes will be reviewed. All NSLDS data on the ISIR will be reviewed for default, overpayment, and loan limit status. Selective Service and Social Security match information will be reviewed.

Important! If the Financial Aid Office suspects that a student, or other individual, has intentionally misreported information or altered documentation to fraudulently obtain federal financial aid funds, the office can report its suspicions, and will provide the evidence, to the Office of Inspector General, U.S. Department of Education, for review. Suspicious activities will be reported directly to the Dallas Texas Office of the Inspector General, U.S. Department of Education.

The Office of Financial Aid at Eastern will report to the Office of Inspector General all instances of suspected fraud where a financial aid applicant, employee, or other individual has misreported and/or altered documentation for the purpose of increasing aid eligibility or fraudulently obtaining federal funds.

Documentation for all financial aid submissions that result in conflicting information may at the discretion of Eastern be turned over to the U. S. Department of Education for review.

10.015 – Immigration Documentation for Title IV Funds

Eastern Oklahoma State College requests proof and secures confirmation of the immigration status of applicants for Title IV, HEA student financial assistance who claim to meet the eligibility requirements of 668.33(a)(2).

The Registrar’s Office at Eastern processes and registers immigration documents for the college. The Registrar’s Office also works with students to explain and resolve immigration issues such as program extensions, school transfers, re-entry procedures and related matters that should occur.

To be eligible to receive Title IV, HEA program assistance, a student must:

- Be a citizen or national of the United States; or
- Provide evidence from the U.S. Immigration and Naturalization Service that he/she:
 - Is a permanent resident of the United States; or
 - Is in the United States for other than a temporary purpose with the intention of becoming a citizen or permanent resident.

If a student asserts that he/she is a citizen of the United States on the Free Application for Federal Student Aid (FAFSA), the U.S. Immigration and Naturalization personnel attempts to confirm that assertion under a data match with the Social Security Administration.

If the Social Security Administration confirms the student's citizenship, the U.S. Immigration and Naturalization personnel reports the confirmation to Eastern Oklahoma State College and the student.

If the Social Security Administration does not confirm the student's citizenship assertion under the data match with the U.S. Immigration and Naturalization, the student can establish U.S. citizenship by submitting documentary evidence of that status to Eastern. Before denying Title IV, HEA assistance to a student for failing to establish citizenship, Eastern will give a student at least thirty (30) days’ notice to produce evidence of U.S. citizenship.

Eastern requires any student that was born outside of the United States to provide documentation to verify his/her citizenship. That documentation would include, but is not limited to the following:

- A birth certificate (American citizen born out of the country because of a parent’s military duty, for example)
- Copies of citizenship “green” card
- A Driver’s License
- A Social Security Card
- Any other documentation associated with the student’s eligible non-citizen status

Students that cannot provide this information are considered International and must submit the required documentation for international students. Students will be provided with documentation in writing of a secondary confirmation. The correspondence will include information concerning the consequences of a failure to provide the documentation by the set deadline, a clear explanation of the documentation the student must submit, and the students' responsibilities with respect to compliance.

Secondary Confirmation

Per federal regulations, Eastern has a policy for requesting proof and securing confirmation of the immigrant status of applicants for Title IV HEA student financial assistance who claim to meet the eligibility requirements. When a student's output document (SAR/ISIR) does not confirm a student's status as an eligible non-citizen, the student must provide Eastern with appropriate documentation showing that he/she is a permanent resident or other eligible non-citizen. Eastern will initiate a secondary confirmation of this documentation with the U.S. Department of Homeland Security (DHS) to ensure validity.

If the student does not pass the automated secondary confirmation, they must provide an unexpired documentation showing he/she is an eligible non-citizen. If conflicting information is provided about his/her immigration status they will be sent through the last resort confirmation process.

As a last resort, if the Financial Aid Office determines that the documentation is legitimate, the G-845 document is forwarded to the U.S. Citizenship and Immigration Services (USCIS)

- The G-845 will be submitted within ten (10) days from the date Eastern receives the results of the primary confirmation. If the student does not comply with the supporting documentation within this deadline, FSA funds may not be awarded.
- The student is informed that no determination of the student's eligibility will be made until an opportunity to submit immigration status documents is provided.
- The G-845 is submitted to the United States Citizenship and Immigration Services (USCIS) for final determination.

The following is a partial list of documentation that may be used as evidence; however additional documentation may be required:

Lawful permanent residents are non-citizens who are legally permitted to live and work in the U.S. permanently. The standard document is the Permanent Resident Card (Form I-551 since 1997) or Resident Alien Card (Form I-551 before 1997). Both forms are referred to colloquially as "green cards," though they have changed colors over the years. Possessors of the older Alien Registration Receipt Card (Form I-151, issued prior to June 1978) should have replaced it with a newer card, but for receiving FSA funds it is acceptable as evidence of permanent residence.

Permanent residents may also present an Arrival/Departure Record (CBP Form I-94) or the Departure Record (Form I-94A, which is used at land border ports of entry) with the endorsement "Processed for I-551. Temporary Evidence of Lawful Admission for Permanent

Residence. Valid until _____. Employment Authorized.” Under certain circumstances, the I-94 will no longer be issued to students who are not refugees, asylees, or parolees. Students without I-94 documentation may have their status confirmed by a Customs and Border Patrol (CBP) stamp, showing class of admission and date admitted, on their passport, although an I-551 is preferable, if available. The form will have an A-Number annotated on it and is acceptable if the expiration date has not passed.

The U.S. Department of State issues a machine-readable immigrant visa (MRIV) in the holder’s passport. The MRIV will have a U.S. CBP inspector admission stamp, and the statement “UPON ENDORSEMENT SERVES AS TEMPORARY I-551 EVIDENCING PERMANENT RESIDENCE FOR 1 YEAR” will appear directly above the machine-readable section. An MRIV with this statement, contained in an unexpired foreign passport and endorsed with the admission stamp, constitutes a temporary I-551, valid for one (1) year from the date of endorsement on the stamp.

The USCIS issues the United States Travel Document (mint green cover), which contains the Reentry Permit (Form I-327) and the Refugee Travel Document (Form I-571). It is used by lawful permanent residents (as well as refugees and asylees) and is annotated with “Permit to Reenter Form I-327 (Rev. 9-2-03).”

If the student has an I-551 with a baby picture, he/she should update the I-551 with the USCIS. Permanent residents are expected to get a new picture and be fingerprinted at the age of 14. Eastern may submit the documents to USCIS and pay a student who has an I-551 with a baby picture as long as confirmation has been obtained that it belongs to the student. Eastern obtains confirmation by comparing the I-551 to a current photo ID that has the student’s name, date of birth, and signature. The current ID must also be consistent with any identifying information in the student’s file.

A student who has an approved application for permanent residence on file with the USCIS and who is waiting for a permanent resident card should have an I-797 Approval Notice from USCIS indicating such, as well as an alien number, which will give notice of current status. Note that an application for permanent resident status alone is not sufficient for determining eligibility for FSA funds.

If a person is applying to suspend deportation, he/she must request a hearing before an immigration law judge who will render an oral or written decision. If that is favorable, the USCIS will give the applicant a Form I-551, which will certify his/her lawful permanent resident status. There is no special category for people who have been granted suspension of deportation.

Conditional resident aliens are eligible for aid if their documentation has not expired. They may have a valid I-551, I-94, I-94A, or a passport with an MRIV bearing the statement “Upon endorsement serves as temporary I-551 evidencing permanent residence for 1 year.”

The Marriage Fraud Amendments established a two-year conditional permanent resident status for alien spouses of U.S. citizens or legal immigrants whose marriage took place less than two years before the spouse applied for permanent resident status. This status may also apply to any of the spouse’s children who are aliens.

Form I-551 of a conditional permanent resident alien is the same as I-551 that is issued to regular permanent residents, except that the card for a conditional permanent resident expires in two years, as opposed to ten (10) years for the regular card. A conditional permanent residents must file a petition for removal of this restriction in the ninety (90) days before the end of the two (2) years. The USCIS will review the petition and, if the result of the review is satisfactory, drop the restriction and issue new documents.

Refugee Status continues unless revoked by DHS or until lawful permanent resident status is granted, which refugees apply for after one (1) year (although they may remain in refugee status much longer). They may have a Form I-94 or I-94A annotated with a stamp showing admission under Section 207 of the Immigration and Nationality Act (INA). They may also have the old Refugee Travel Document (Form I-571) or the newer U.S. Travel Document annotated with “Refugee Travel Document Form I-571 (Rev. 9-2-03).”

Refugees are given indefinite employment authorization.

Individuals granted asylum can apply for permanent residence after one (1) year. Asylee status continues unless revoked by DHS or until permanent resident status is granted. Asylees will have an I-94 or I-94A with a stamp showing admission under Section 208 of the INA. They may also have the same travel documents described for refugees. Persons granted asylum in the United States are authorized for indefinite employment.

Persons paroled into the U.S. for at least one (1) year must provide evidence (such as having filed a valid permanent resident application) from the DHS that they are in the U.S. for other than a temporary purpose and intend to become a citizen or permanent resident. Their documentation must have a stamp indicating that the student has been paroled into the United States for at least one (1) year, with a date that has not expired (federal student aid cannot be disbursed after the document has expired).

Cuban-Haitian entrants as defined by Section 501(e) of the Refugee Education Assistance Act (REAA) of 1980. Such students will have a stamp across the face of the I-94 indicating that they have been classified as a “Cuban-Haitian Entrant (Status Pending).” Under certain circumstances, the I-94 will no longer be issued to students who are not refugees, asylees, or parolees. Students without I-94 documentation may have their status confirmed by a Customs and Border Patrol (CBP) stamp, showing class of admission and date admitted or paroled on their passport. Note that a document showing that the holder is a Cuban-Haitian entrant is valid even if the expiration date has passed.

Conditional entrants are refugees who entered the United States under the seventh preference category of P.L. 89-236 or whose status was adjusted to lawful permanent resident alien under that category. They had to have entered the U.S. prior to the enactment of the Refugee Act of 1980. Students may have an I-94 with a stamp displaying “Section 203(a)(7)” and indicating that the person was admitted to the United States as a conditional entrant. Because the predecessor of the DHS stopped using this category after March 31, 1980, you should not disburse FSA funds if the student has an I-94 with conditional entrant status granted after that date.

Eastern has an established procedure to ensure due process for the student if FSA funds are disbursed but the Financial Aid Office later determines (using secondary confirmation) that the student isn't an eligible non-citizen. Eastern will notify the student of his/her lack of eligibility and the student will be given an opportunity to contest the decision by submitting to Eastern any additional documents that support their claim to be an eligible non-citizen. If the documents appear to support the student's claim, Eastern will submit them to U.S. Citizenship and Immigration Services (USCIS) using paper secondary confirmation. Eastern will then notify the student of the final decision, based on the secondary confirmation results.

10.016 - Iraq and Afghanistan Service Grant Program

The Iraq and Afghanistan Service Grant is awarded to a student whose parent or guardian died as a result of performing military service in Iraq or Afghanistan and the student is not receiving a Federal Pell Grant only because of that program's need requirement. The Iraq and Afghanistan Service Grant award amount provided to an eligible student for an award year may not exceed the maximum Federal Pell Grant for that award year with adjustments, if necessary, for things such as the student's enrollment status and the student's Title IV Cost Of Attendance (COA) used to determine financial need.

The Iraq and Afghanistan Service Grant is not based on an eligible student's financial need nor is it considered estimated financial assistance that reduces the amount of any other Federal student aid that the student may also qualify for. Effective with the 2012-2013 award year, the duration of a student's eligibility to receive an Iraq and Afghanistan Service Grant is limited to a total of 12 semesters (or its equivalent).

Eastern follows a process to ensure only eligible students receive funds under the Iraq and Afghanistan Service Grant Program and award adjustments are made accurately and timely

Eastern follows a process to identify the ISIRs that contain the DoD Match Flag utilizing data from the Ellucian Colleague system. Enrollment staff will contact the Financial Aid Office for students self-reporting eligibility so that a verification of eligibility can take place.

For Applicants with a Pell-Eligible EFC

Eastern follows a process to ensure that all Title IV aid is awarded based on an EFC of zero, without regard to the students' calculated EFC.

For applicants with an EFC that are not Pell-Eligible

Eastern follows a process to ensure students are eligible to receive an award under the Iraq and Afghanistan Service Grant Program, without regard to the calculated EFC. The amount of the Iraq and Afghanistan Service Grant Program award is the same as the maximum Pell Grant for the award year, adjusted for the student's enrollment status and cost of attendance. All other Title IV aid must be awarded based on the student's calculated EFC.

10.017– Federal Direct Loans & Plus Loans Policy

Loan Programs

Eastern Oklahoma State College participates in the William D. Ford Federal Direct Stafford Loan Program. Loans available are the Subsidized Direct Stafford Loan, Unsubsidized Direct Stafford Loan, and Parent Loan for Undergraduate Students (PLUS).

Every award year, all students who are interested in Federal Title IV or state aid must complete the FAFSA (Free Application for Federal Student Aid) online at www.fafsa.ed.gov. An EFC (expected family contribution) is calculated by the Department of Education (ED) based on the data reported on the FAFSA and this EFC is used to determine eligibility for need based aid, including the Subsidized Stafford Loan. To determine a student's financial need, the EFC is subtracted from the COA (cost of attendance) which is determined by the Financial Aid Office. The COA includes tuition, fees, books, supplies, room, board, personal expenses, and transportation expenses. Students may also be eligible for an Unsubsidized Stafford Loan and parents of a dependent student may be eligible for a PLUS (Parent Loan for Undergraduate Students) loan.

These loans **must** be repaid, and both annual and aggregate loan limits, when applicable, are determined by ED.

Direct Loan Packaging Policy

It is the philosophy of Eastern that loans should be taken out as the last alternative for financing a student's education. Pell Grants are the first source of aid. All grants, scholarships, and employment programs are encouraged before seeking loans. It is also recognized that in many cases, a student loan may be the only viable alternative for meeting educational expenses and is to be considered as an investment in the education and future of students.

All of a student's estimated financial assistance, unless specifically prohibited from being used in the calculation [certain VA], is used to determine the student's eligibility for loans. If the student meets eligibility requirements, Subsidized Direct Stafford Loans are always offered first. Next, Unsubsidized Direct Stafford Loans are offered, which may include amounts that are substituted for the Expected Family Contribution (EFC).

Students are directed to the Eastern Financial Aid web site for information and instructions on how to apply. The links to the required Entrance and Exit loan Counseling and the Master Promissory Note are online.

Students will have loans awarded if they have completed Master Promissory Note (MPN) and entrance counseling on file. Student loans can be disbursed after the students have completed the loan request form confirming the loan types and amounts, they wish to borrow.

Note: If a student is in default on a previous loan, no federal aid, including Stafford loans, will be awarded.

Federal Direct Loan/PLUS Processing

For all direct loans, Eastern will confirm that the borrower is eligible by:

- ensuring the student has completed a FAFSA
- determining that the student is enrolled at least half-time and making satisfactory progress
- reviewing the NSLDS information on the ISIR to ensure the student is not in default, does not owe an overpayment on a Title IV grant or loan, or will not exceed the annual or aggregate loan limits
- ensuring that the amount of the loan, along with other aid totals, will not exceed the student’s financial need
- ensuring that the loan disbursement dates meet cash management and disbursement requirements
- determining Pell Grant eligibility and including in the package before awarding loans
- determining the student’s eligibility for Subsidized Direct Stafford Loan before awarding Unsubsidized Direct Stafford Loan
- ensuring that the amount of the loan award will not exceed the student’s annual or aggregate loan limit
- prorating the annual loan limit for an undergraduate enrolled in a remaining period of study that is shorter than an academic year

Loan Limits

Loan limits for first year and second year undergraduates:

Year	Dependent Students (except students whose parents are unable to obtain PLUS Loans)	Independent Students (and dependent undergraduate students whose parents are unable to obtain PLUS Loans)
First-Year Undergraduate Annual Loan Limit	\$5,500—No more than \$3,500 of this amount may be in subsidized loans.	\$9,500—No more than \$3,500 of this amount may be in subsidized loans.
Second-Year Undergraduate Annual Loan Limit	\$6,500—No more than \$4,500 of this amount may be in subsidized loans.	\$10,500—No more than \$4,500 of this amount may be in subsidized loans.
Subsidized and Unsubsidized Aggregate Loan Limit	\$31,000—No more than \$23,000 of this amount may be in subsidized loans.	\$57,500 for undergraduates—No more than \$23,000 of this amount may be in subsidized loans. \$138,500 for graduate or professional students—No more than \$65,500 of this amount may be in subsidized loans. The graduate aggregate limit includes all federal loans received for undergraduate study.

Because Eastern is a community college, there will be no third-year or beyond direct loans certified. There will be no graduate or professional direct loans certified.

Parent Loans for Undergraduate Students (PLUS)

There are no fixed annual or aggregate loan limits for Direct PLUS Loans. The total Direct PLUS Loan amount borrowed by one parent or borrowed separately by more than one parent on behalf of a dependent student may not exceed the student's estimated cost of attendance minus other financial aid awarded for the period of enrollment. This is the only borrowing limit for Direct PLUS Loans.

Refusing to Originate a Loan

Eastern will only refuse to originate the loan for an individual borrower or originate a loan for an amount less than the borrower's maximum eligibility when it is determined to be appropriate. Eastern will ensure that the decisions are made on a case-by-case basis, and do not constitute a pattern or practice that denies access to borrowers because of race, sex, color, income, religion, national origin, age, or handicapped status.

When Eastern decides not to originate a loan or to reduce the amount of the loan, the Financial Aid Office will document the reasons and provide the explanation to the student in writing. Eastern does not have a policy of limiting Direct Loan borrowing on an across-the-board or categorical basis.

Loan Awards and Disbursements

Students must have the following items completed to be eligible to be awarded Direct Stafford Loans:

- a complete financial aid file
- is enrolled at least half-time
- a Master Promissory Note
- Entrance counseling has been confirmed.

After the student completes the Eastern Oklahoma State College Student Loan Form verifying the amounts and types of loans desired, the loan can be processed and applied to the student account. The disbursements will be made after the end of the drop/add period each semester. Eastern will make at least one (1) disbursement in each term of the student's loan period.

Loan Counseling

Each student borrowing through the Direct Loan Program must have completed entrance counseling documentation on record. Eastern will verify that the student has completed the counseling. If the student has not completed the counseling, he/she will be directed to www.studentloans.gov. If a student has completed entrance counseling, it need not be repeated for subsequent loans.

When a student is found to have ceased at least half-time study at Eastern, that student will be directed to complete exit counseling. Each student who graduates, withdraws, or otherwise ceases attendance at Eastern will be notified of the requirement to complete the required exit

counseling within thirty (30) days after the school learns the borrower is no longer at least a half-time student.

Documentation of the completed entrance and exit counseling will be maintained in the student loan file. Financial aid personnel will be available to answer questions after students complete either the entrance or exit counseling and notify the Financial Aid Office of their questions or concerns.

Deferments and Forbearance

A deferment is a period during which repayment of the principal and interest of the direct loan is temporarily delayed.

Situations in which a student with Direct Loans may apply for a deferment:

- During a period of at least half-time enrollment in college or career school
- During a period of study in an approved graduate fellowship program or in an approved rehabilitation training program for the disabled
- During a period of unemployment or inability to find full-time employment
- During a period of economic hardship (including Peace Corps service)
- During a period of active-duty military service during a war, military operation, or national emergency
- During the thirteen (13) months following the conclusion of qualifying active-duty military service, or until you return to enrollment on at least a half-time basis, whichever is earlier, if
 - the student is a member of the National Guard or other reserve component of the U.S. armed forces and
 - the student was called or ordered to active duty while enrolled at least half-time at an eligible school or within six months of having been enrolled at least half-time.

Most deferments are not automatic, and the student will need to submit a request to their loan servicer. For those students enrolled on at least a half-time basis, the student can also contact the Financial Aid Office for more information.

If a student does not qualify for a deferment but has difficulty making loan payments, the student may be able to qualify for a forbearance. The student will request discretionary forbearances from his/her lender for reasons of financial hardship or illness. The lender may or may not grant the forbearance.

The lender is required to grant forbearance when the student meets eligibility requirements for any of these reasons:

- The student is serving in a medical or dental internship or residency program and meets specific requirements.
- The total amount the student owes each month for all the student loans received is twenty (20) percent or more of the student's total monthly gross income (additional conditions apply).

- The student is serving in a national service position for which he/she received a national service award.
- The student is performing teaching service that would qualify for teacher loan forgiveness.
- The student qualifies for partial repayment of loans under the U.S. Department of Defense Student Loan Repayment Program.
- The student is a member of the National Guard and has been activated by a governor, but the student is not eligible for a military deferment.

Repayment Plans

The following information is an overview of repayment plans, courtesy of Federal Student Aid.

Overview of Direct Loan and FFEL Program Repayment Plans			
Repayment Plan	Eligible Loans	Monthly Payment and Time Frame	Eligibility and Other Information
<u>Standard Repayment Plan</u>	<ul style="list-style-type: none"> • Direct Subsidized and Unsubsidized Loans • Subsidized and Unsubsidized Federal Stafford Loans • all PLUS loans • all <i>Consolidation</i> Loans (Direct or FFEL) 	Payments are a fixed amount. Up to 10 years (up to 30 years for Consolidation Loans).	All borrowers are eligible for this plan. You'll pay less over time than under other plans.
<u>Graduated Repayment Plan</u>	<ul style="list-style-type: none"> • Direct Subsidized and Unsubsidized Loans • Subsidized and Unsubsidized Federal Stafford Loans • all PLUS loans • all <i>Consolidation</i> Loans (Direct or FFEL) 	Payments are lower at first and then increase, usually every two years. Up to 10 years (up to 30 years for Consolidation Loans).	All borrowers are eligible for this plan. You'll pay more over time than under the 10-year Standard Plan.

<p><u>Extended Repayment Plan</u></p>	<ul style="list-style-type: none"> • Direct Subsidized and Unsubsidized Loans • Subsidized and Unsubsidized Federal Stafford Loans • all PLUS loans • all Consolidation Loans (Direct or FFEL) 	<p>Payments may be fixed or graduated.</p> <p>Up to 25 years.</p>	<ul style="list-style-type: none"> • If you're a Direct Loan borrower, you must have more than \$30,000 in outstanding Direct Loans. • If you're a FFEL borrower, you must have more than \$30,000 in outstanding FFEL Program loans. • Your monthly payments will be lower than under the 10-year Standard Plan or the Graduated Repayment Plan. • You'll pay more over time than under the 10-year Standard Plan.
<p><u>Revised Pay As You Earn Repayment Plan (REPAYE)</u></p>	<ul style="list-style-type: none"> • Direct Subsidized and Unsubsidized Loans • Direct PLUS loans made to students • Direct Consolidation Loans that do not include PLUS loans (Direct or FFEL) made to parents 	<ul style="list-style-type: none"> • Your monthly payments will be 10 percent of <i>discretionary income</i>. • Payments are recalculated each year and are based on your updated income and family size. • If you're married, both your and your spouse's income or loan debt will be considered, whether taxes are filed jointly 	<ul style="list-style-type: none"> • Any Direct Loan borrower with an eligible loan type may choose this plan. • Your monthly payment can be more than the 10-year Standard Plan amount. • You may have to pay income tax on any

		<p>or separately (with limited exceptions).</p> <ul style="list-style-type: none"> Any outstanding balance on your loan will be forgiven if you haven't repaid your loan in full after 20 or 25 years. 	<p>amount that is forgiven.</p> <ul style="list-style-type: none"> Good option for those seeking Public Service Loan Forgivenness (PSLF).
<p><u>Pay As You Earn Repayment Plan (PAYE)</u></p>	<ul style="list-style-type: none"> Direct Subsidized and Unsubsidized Loans Direct PLUS loans made to students Direct Consolidation Loans that do not include (Direct or FFEL) PLUS loans made to parents 	<ul style="list-style-type: none"> Your maximum monthly payments will be 10 percent of discretionary income. Payments are recalculated each year and are based on your updated income and family size. If you're married, your spouse's income or loan debt will be considered only if you file a joint tax return. Any outstanding balance on your loan will be forgiven if you haven't repaid your loan in full after 20 years. 	<ul style="list-style-type: none"> You must be a <i>new borrower</i> on or after Oct. 1, 2007, and must have received a <i>disbursement</i> of a Direct Loan on or after Oct. 1, 2011. You must have a high debt relative to your income. Your monthly payment will never be more than the 10-year Standard Plan amount. You'll pay more over time than under the 10-year Standard Plan. You may have to pay income tax on any amount that is forgiven. Good option for those seeking Public Service Loan Forgivenness (PSLF).

<p><u>Income-Based Repayment Plan (IBR)</u></p>	<ul style="list-style-type: none"> • Direct Subsidized and Unsubsidized Loans • Subsidized and Unsubsidized Federal Stafford Loans • all PLUS loans made to students • Consolidation Loans (Direct or FFEL) that do not include Direct or FFEL PLUS loans made to parents 	<ul style="list-style-type: none"> • Your monthly payments will be 10 or 15 percent of discretionary income. • Payments are recalculated each year and are based on your updated income and family size. • If you're married, your spouse's income or loan debt will be considered only if you file a joint tax return. • Any outstanding balance on your loan will be forgiven if you haven't repaid your loan in full after 20 or 25 years. • You may have to pay income tax on any amount that is forgiven. 	<ul style="list-style-type: none"> • You must have a high debt relative to your income. • Your monthly payment will never be more than the 10-year Standard Plan amount. • You'll pay more over time than under the 10-year Standard Plan. • Good option for those seeking Public Service Loan Forgiveness (PSLF).
<p><u>Income-Contingent Repayment Plan (ICR)</u></p>	<ul style="list-style-type: none"> • Direct Subsidized and Unsubsidized Loans • Direct PLUS Loans made to students • Direct Consolidation Loans 	<ul style="list-style-type: none"> • Your monthly payment will be the lesser of <ul style="list-style-type: none"> ◦ 20 percent of discretionary income, or ◦ the amount you would pay on a repayment plan with a fixed payment over 12 years, adjusted according to your income. • Payments are recalculated each year and are based on your updated income, family size, and the 	<ul style="list-style-type: none"> • Any Direct Loan borrower with an eligible loan type may choose this plan. • Your monthly payment can be more than the 10-year Standard Plan amount. • You may have to pay income tax on the amount that is forgiven. • Good option for those seeking Public Service Loan

		<p>total amount of your Direct Loans.</p> <ul style="list-style-type: none"> • If you're married, your spouse's income or loan debt will be considered only if you file a joint tax return or you choose to repay your Direct Loans jointly with your spouse. • Any outstanding balance will be forgiven if you haven't repaid your loan in full after 25 years. 	<p>Forgiveness (PSLF).</p> <ul style="list-style-type: none"> • Parent borrowers can access this plan by consolidating their Parent PLUS Loans into a <i>Direct Consolidation Loan</i>.
<p><u>Income-Sensitive Repayment Plan</u></p>	<ul style="list-style-type: none"> • Subsidized and Unsubsidized Federal Stafford Loans • FFEL PLUS Loans • FFEL Consolidation Loans 	<p>Your monthly payment is based on annual income.</p> <p>Up to 15 years.</p>	<ul style="list-style-type: none"> • You'll pay more overtime than under the 10-year Standard Plan. • The formula for determining the monthly payment amount can vary from <i>lender</i> to lender.

Direct loan borrowers should contact their lender or servicer with specific questions about repayment and repayment options.

Administrative and Fiscal Control

The Registrar Office completes and submits student status confirmation reports using the National Student Loan Clearinghouse every thirty (30) days. By maintaining the 30-day submission routine, all student enrollment information is updated to meet requirements.

Records for Direct Loans are retained to provide documentation of the student eligibility, disbursements, and counseling notices. Most of the documentation is kept within the campus Ellucian Colleague system. There is a paper loan file kept in the Financial Aid Office that contains a copy of the Master Promissory Note, verification of entrance counseling, copies of notification letters to the student, and any other pertinent information for the student loan. In an

effort to maintain the requirement that Direct Loan records are kept for three (3) years after the student last attended, the paper files in the Financial Aid Office are retained for seven (7) years.

The Business Office maintains fiscal records that account for the receipt and expenditure of Title IV program funds with general accounting principles. All Direct Loan funds are received and used only for disbursement of Direct Loans to eligible borrowers.

Borrower responsibilities and defenses

A student has certain responsibilities and defenses with his/her Direct Loans. The borrower must provide a statement that the loan will be used for the cost of the student's attendance, that the borrower is eligible for the loan, information concerning any FFEL and/or Direct Loans the borrower holds, including Federal Consolidation Loan or Direct Consolidation Loan, and a statement authorizing the school to release to the Secretary of U.S. Department of Education (DOE) information relevant to the student's eligibility to borrow or have a parent borrow on the student's behalf. The student borrower must notify the U.S. Department of Education of any changes in name, address, student status of less than half-time, employer or employer's address. The student borrower must also promptly notify the school of any changes in address during enrollment.

The student has certain defenses which are specified in 34 CFR 685.206(c). The regulation states, in part, "(c)(1) [i]n any proceeding to collect on a Direct Loan, the borrower may assert as a defense against repayment, an act or omission of the school attended by the student that would give rise to a cause of action against the school under applicable State law." Inquiries regarding student defense against repayment should be directed to the U.S. Department of Education.

Default

Failure to repay a loan according to the terms agreed to results in default. For Direct Loan programs, the loan is in default if the student fails to make a payment for 270 days, if paid monthly (or 330 days, if payments are due less frequently). The student's lender is required to report the default to at least one national credit bureau. Students should contact their servicer for information about avoiding going into default or for information on getting out of default.

10.018 – Loan Disclosure Policies

The U.S. Department of Education requires institutions to disclose certain loan information. Eastern follows these loan disclosure requirements.

State Grant Assistance

Eastern informs all eligible borrowers, as defined in 34 CFR part 682, about the availability and eligibility of those borrowers for state grant assistance from Oklahoma and informs borrowers from another state of the source of further information concerning state grant assistance from that state.

Student Loan Information Published by the U.S. Department of Education

Eastern provides information published by the U.S. Department of Education to students at any time that information regarding loan availability is provided. The publication includes

information about the rights and responsibilities of students and schools under the Title IV, HEA loan programs.

National Student Loan Data System (NSLDS)

The National Student Loan Data System (NSLDS) is the U.S. Department of Education's central database for student aid. NSLDS receives data from schools, guaranty agencies, the Direct Loan program, and other U.S. Department of Education programs. NSLDS Student Access provides a centralized, integrated view of Title IV loans and grants so that recipients of Title IV Aid can access and inquire about their Title IV loans and/or grant data. Eastern will submit information for any student who enters into an agreement for a Direct Loan to the NSLDS and that information will then be available to authorized persons. Enrollment information is also submitted to NSLDS on a regular basis.

Entrance Counseling for Student Loan Borrowers

Prior to the first disbursement, Eastern will provide a first-time borrower of a Federal Direct Loan (other than consolidated or Parent PLUS loans) with comprehensive information on the terms and conditions of the loan and of the borrower's responsibilities. The information includes:

- An explanation of the use of the Master Promissory Note (MPN)
- An emphasis to the borrower on the seriousness and importance of the repayment obligation the student borrower is assuming
- A description of the likely consequences of default, including adverse credit reports, delinquent debt collection procedures under Federal law, and litigation
- The obligation of the borrower to repay the full amount of the loan regardless of whether the borrower completes program or completes within regular time for completion, is unable to obtain employment upon completion, or is otherwise dissatisfied with or does not receive the educational or other services the borrower purchased from the school
- Information about the monthly payment amounts based on
 - A range of student levels of indebtedness of Direct Subsidized Loan and Direct Unsubsidized Loan borrowers, or student borrowers with Direct Subsidized, Direct Unsubsidized, and Direct PLUS Loans depending on the types of loans the borrower has obtained; or
 - The average indebtedness of other borrowers in the same program at the same school as the borrower
- To the extent practicable, provide an explanation of the effect of accepting the loans to be disbursed on the eligibility of the borrower for other form of student financial assistance
- Information on the accrual and capitalization of interest
- Borrowers of unsubsidized loans have the option of paying interest while in school
- Definition of half-time enrollment and the consequences of not maintaining half-time enrollment

- Importance of contacting appropriate offices if student withdraws prior to completion of program of study
- Sample monthly repayment amounts
- Consequences of default
- Information about the NSLDS and how the borrower can access the borrowers' records
- Name and contact information for individuals to help answer student questions regarding their rights, responsibilities, or the loan's terms and conditions

Exit Counseling for Student Loan Borrowers

Eastern Oklahoma State College provides counseling to borrowers of loans under the FFEL, Federal Direct Loan, or Perkins Loan programs (other than consolidated or Parent PLUS loans) shortly before the student borrower ceases at least half-time study at the school. The counseling provides information on:

- Average anticipated monthly repayment amount
- Repayment plan options
- Options to prepay or pay on a shorter schedule
- Debt Management Strategies
- Use of Master Promissory Note
- The seriousness and importance of student's repayment obligation
- Terms and conditions for forgiveness or cancellation
- Copy of information provided by the U.S. Department of Education
- Terms and conditions for deferment or forbearance
- Consequences of default
- Options and consequences of loan consolidation
- Tax benefits available to borrowers
- The obligation of the borrower to repay the full amount of the loan regardless of whether the borrower completes program or completes within regular time for completion, is unable to obtain unemployment upon completion, or is otherwise dissatisfied with or did not receive the educational or other services the borrower purchased from the school
- Availability of the Student Loan Ombudsman's office
- Information about NSLDS. The U.S. Department of Education is required to provide a disclosure form for students and prospective students about NSLDS

Private Educational Loan Disclosures

Eastern does not recommend, promote, or endorse any lenders and does not have any preferred lender lists. The federal government is the sole lender for the Federal Direct Student Loans: Federal Direct Subsidized Stafford, Federal Direct Unsubsidized Stafford, and Federal Direct Parent loans.

Students should only consider obtaining private education loans after maxing out all eligibility for federal aid: Federal Pell Grant, Federal SEOG Grant, Federal Work-study, and Federal Direct Student Loans.

To determine federal aid eligibility, students should complete the Free Application for Federal Aid (FAFSA). Federal student loans often have more favorable terms than private loans. Private education loans are a last resort to meet education costs and should only be considered after exhausting all other aid options (federal, state, and institutional). Students should contact the Financial Aid Office prior to considering private education loans. For more information about private education loans visit the Smart Student Guide on the Eastern Financial Aid website.

Eastern recognizes and abides by the College Loan Code of Conduct.

10.019 - Ethical Principles for Education Loans

The purpose of this policy is to prohibit conflicts of interest in situations involving student financial aid and to establish standards of conduct for employees with responsibility for student financial aid. This policy applies to all employees who work in the Financial Aid Office and all other Eastern employees who have responsibilities related to educational loans or other forms of student financial aid.

Eastern's statement of Ethical Principles provides that the primary goal of institutional financial aid professionals is to help students achieve their educational potential by providing appropriate financial resources. The financial aid professionals shall:

- Be committed to removing financial barriers for those who wish to pursue postsecondary education.
- Make every effort to assist students with financial needs.
- Be aware of the issues affecting students and advocate their interests at the institutional, state, and federal levels.
- Support efforts to encourage students to aspire to and plan for education beyond high school.
- Educate students and families through quality consumer information.
- Respect the dignity and protect the privacy of students and ensure the confidentiality of student records and personal circumstances.
- Ensure equity by applying all need analysis formulas consistently across the institution's full population of student financial aid applicants.
- Provide services that do not discriminate on the basis of race, gender, ethnicity, sexual orientation, religion, disability, age, or economic status.
- Recognize the need for professional development and continuing education opportunities.

- Promote the free expression of ideas and opinions, and foster respect for diverse viewpoints within the profession.
- Commit to the highest level of ethical behavior and refrain from conflict of interest or the perception thereof.
- Maintain the highest level of professionalism.

10.020 – Code of Conduct for Education Loans

Eastern’s Code of Conduct applies to the officers, employees, and agents of Eastern with responsibilities with respect to education loans. These officers, employees, and agents are expected to always maintain exemplary standards of professional conduct in all aspects of carrying out his/her responsibilities, specifically including all dealings with any entities involved in any manner in student financial aid, regardless of whether such entities are involved in a government sponsored, subsidized, or regulated activity. The officers, employees, and agents of Eastern with responsibilities with respects to education loans should:

- Refrain from taking any action for his/her personal benefit.
- Refrain from revenue-sharing arrangements with any lender.
- Refrain from receiving gifts from a lender, a guarantor, or a loan service
- Refrain from any contracting arrangement which provides financial benefit from any lender or affiliate of a lender.
- Refrain from accepting compensation for any type of consulting arrangement or contract to provide services to or on behalf of a lender relating to education loans or for service on an advisory board, commission, or group established by lenders or guarantors, except for reimbursement for reasonable expenses.
- Refrain from steering borrowers to particular lenders or delaying loan certifications.
- Refrain from accepting offers of funds for private loans to students in exchange for promises regarding FSA loans, a specified loan volume, or a preferred lender arrangement.
- Refrain from participation in call centers or Financial Aid Office staffing assistance.
- Refrain from taking any action he/she believes is contrary to law, regulation, or the best interests of the students and parents he/she serves.
- Ensure that the information he/she provides is accurate, unbiased and does not reflect any preference arising from any aspect of student financial aid.
- Be objective in making decisions and advising Eastern regarding relationships with any entity involved in an aspect of student financial aid.

10.021 - Preferred Lender Lists

Eastern does not recommend, promote, or endorse any lenders and does not have any preferred lender lists. The federal government is the sole lender for the Federal Direct Student Loans:

Federal Direct Subsidized Stafford, Federal Direct Unsubsidized Stafford, and Federal Direct Parent loans.

It is the policy of Eastern to advise students that they should only consider obtaining private education loans after maxing out all eligibility for federal aid: Federal Pell Grant, Federal SEOG Grant, Federal Work-study, and Federal Direct Student Loans.

To determine federal aid eligibility, students should complete the Free Application for Federal Aid (FAFSA). Federal student loans often have more favorable terms than private loans. Private education loans are a last resort to meet education costs and should only be considered after exhausting all other aid options (federal, state, and institutional). Students should contact the Financial Aid Office prior to considering private education loans. For more information about private education loans, visit the Smart Student Guide to Financial Aid website.

Eastern makes an annual report to the U.S. Department of Education and provides:

- The minimum information the Department determines must be disclosed
- Information required for private loans under the Truth in Lending Act
- Detailed explanation of the reasons a school or school-affiliated organization participates in a preferred lender arrangement with the lender, including why the terms, conditions, and provisions of each type of loan are beneficial to the school's students or their families.