



## Financial Aid Office Policy and Procedures Manual

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### School of Nursing Financial Aid Office Staff:

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### Duke School of Nursing Financial Aid Office

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**Office location: 1150 Pearson Building, 307 Trent Drive**

**Office hours: Monday – Friday, 8:30am – 5:00pm**

### DUSON Mission Statement

The mission of the Duke University School of Nursing (DUSON) is to create a center of excellence for the advancement of nursing science, the promotion of clinical scholarship, and the education of clinical leaders, advanced practitioners and researchers. Through nursing research, education, and practice, students and faculty seek to enhance the quality of life for people of all cultures, economic levels and geographic locations.

The DUSON Financial Aid Office strives for the same excellence through a high level of customer service. We make financial assistance available to accepted students who due to economic circumstances could not otherwise attend. Financial assistance for nursing students is available in the form of scholarships, grants, traineeships, loans, and loan repayment programs to eligible U.S. citizens. Private loans are available to international students with a U.S. cosigner.

## SECTION 1: OVERVIEW

### DUSON Financial Aid Policies and Procedures

The DUSON Financial Aid Director is responsible for developing policies and procedures related to financial aid for the school. For policies related to merit scholarships, the Director works in conjunction with DUSON faculty chair of the selection committee for that program. For need-based scholarships, the Director and Business office collaborate regarding policies and procedures, with approval going through the Associate Dean, Finance and Administration.

Updated policies and procedures are communicated through the Financial Aid section of the DUSON website. New policies or changes may also be communicated through the weekly DUSON communications email, emails directly to

students, faculty, or staff, or to OASS staff or DUSON academic program staff to be communicated on to students and faculty, respectively.

### **Federal Financial Aid Updates**

The DUSON Financial Aid office keeps abreast of federal regulations through a variety of resources. This includes the Federal Student Financial Aid Handbook, Dear Colleague Letters, NASFAA newsletters, IFAP website, webinars, and monthly Graduate and Professional meetings led by the Assistant Vice Provost and Director, Financial Aid.

The following operating policies are designed to assure that the Financial Aid Office is effective in carrying out its responsibilities:

1. All students must apply for need-based financial assistance by submitting the FAFSA to the DUSON Financial Aid Office (School Code 002920).
2. All financial assistance available to DUSON students shall be administered through the Financial Aid Office. The selection of students to receive certain designated scholarships shall be submitted by the responsible department to the Financial Aid Office for processing. Outside student resources received by other offices (such as the Bursar's Office or paid directly to the student) must be reported to the Financial Aid Office.
3. The Financial Aid Office shall maintain adequate records to ensure proper administration of aid funds. This includes ensuring that aid given is not in excess of need and/or the cost of attendance and that aggregate awards do not exceed total expenditures of funds under each program.
4. Selection of students to receive financial aid will be made without regard to age, sex, race, color, religion, sexual orientation, national origin, disability or marital status.
5. Priority consideration for returning student aid is given to students whose files are complete by May 1st.
6. All students applying for aid are required to apply annually for federal assistance.

## **SECTION 2: ADMINISTRATIVE ORGANIZATION OF THE FINANCIAL AID OFFICE**

### **Division of Responsibility between Financial Aid and Fiscal Offices**

There exists a clear and separate division of responsibility for the administration of financial aid programs which are divided between the FAO, the DUSON Business Office, Student Loan Office and the Bursar/Cashier's Office. In order to maintain this division, each office is accountable for the following responsibilities.

The DUSON Financial Aid Office is responsible for the following:

- Collect supporting documentation for the determination of aid eligibility
- Determine student eligibility for financial assistance
- Award federal aid in compliance with laws, regulations, and policies
- Notify students of aid eligibility (loans and scholarships/grants)
- Review annually the need-based scholarship methodology
- Compile and complete financial aid institutional, state and federal reports

The DUSON Business Office is responsible for the following:

- Administer federal grant and traineeship programs
- Compile and complete all federal grant funding reports
- Prepare a master list of scholarships awarded for the current year and update as appropriate
- Fund Management

The Duke Bursar's office is responsible for the following:

- Maintain and disburse accurate bills
- Collect payments for student accounts
- Disburse funds to students
- Report outside scholarships received to the FAO

The Duke Student Loan Office is responsible for the following:

- Process school loan certification
- Process Electronic Funds Transfers to the student accounts
- Administer the Nurse Faculty Loan Program
- Administer the Direct Loan Program

A complete organization chart for the Duke University School of Nursing is available on the DUSON intranet or by request.

### **Financial Aid Office Operations**

The Financial Aid Office is open and available to service students from 8:30 am - 5:00 pm Monday through Friday. General financial aid forms are available within the Financial Aid section of the School of Nursing website: <http://nursing.duke.edu/financial-aid>. General financial aid application information is routed to the Financial Aid Counselor. Emails are responded to within 24 hours.

Phone calls are answered in a friendly and professional manner (i.e., School of Nursing Financial Aid Office. May I help you?). All Financial Aid staff log in and are available through the main financial aid phone number. Students are directed to their Financial Aid Counselor if available, and automatically routed to the next available Financial Aid staff if that person is not available. Every attempt is made to return calls the same business day, and no later than the next business day.

Students are not required to make appointments to meet with Financial Aid Staff. However, students wishing to make an appointment can contact the DUSON Financial Aid Office directly by phone: 919.684.9663 or email: [son\\_finaid@dm.duke.edu](mailto:son_finaid@dm.duke.edu).

The job descriptions for each position in the Financial Aid Office are available on the DUSONnet. The personnel policies of staff members are outlined in the Duke University Staff Handbook, which is distributed to employees. Performance evaluations are conducted on an annual basis. The PEP evaluation form provided by Duke Human Resources is used for FAO employees. Forms must be completed by immediate supervisors.

DUSON Financial Aid staff meetings are called at the discretion of the Financial Aid Director.

### **Records Management**

All records and conversations between an aid applicant, his/her family and the staff of the FAO are confidential and entitled to the protection ordinarily given a counseling relationship. DUSON assures the confidentiality of student educational records in accordance with institutional, state, and federal laws including the Family Educational Rights and Privacy Act (FERPA) of 1974. More information regarding FERPA, including what is and is not considered directory information, is available through the [Office of the University Registrar](#).

The FAO maintains all financial aid information electronically. Official financial aid award information, including the financial aid award letter communication, as well as a checklist of items received and any relevant comments, are kept in PeopleSoft. Any relevant documents are stored in ImageNow. The FAO also uses Qualtrics surveys for additional financial aid application questions, and those are stored in the Financial Aid shared drive.

Physical records for students who graduated on or prior to May 2013 are in off-site storage. The FAO keeps inactive records for three years. All financial aid files are retained for three years after submission of the FISAP report. Any records involved in any claim or expenditure which has been questioned by federal audit are retained until the question is resolved. After the appropriate time period, records are shredded.

### **2017 Financial Aid Calendar**

JANUARY

3 - Spring term financial aid disbursement

5 – DNP Spring orientation financial aid presentation

11- Spring classes begin

18 – ABSN Spring orientation financial aid presentation  
25 – Spring Drop/Add ends  
Duke Preferred Lender List reviewed and updated for 2017-18  
Forms and deadlines updated on the website for 2017-18

#### FEBRUARY

8 – ABSN Fall 2017 ABSN webinar  
20-24 – Fall 2017 MSN Interview Days  
20 – Registration begins for summer semester  
24 - Tuition voted on by the Board of Trustees  
Fall 2017 aid year activation and checklist assignment begins  
Spring 2017 exit loan counseling sessions

#### MARCH

2017-18 cost of attendance budget reviewed and established (including average tuition and loan fees)  
2017-18 budgets sent to SISS office to be added to PeopleSoft  
2017-18 packaging plan updates to SISS  
Update prompts for 3C Engine assignment if needed (check date range within CommGen set up as well)  
10 - Spring Break begins at 7pm  
20 – Spring classes resume  
20 – Information Session financial aid presentation  
24,31 – ABSN Fall 2017 Duke Days

#### APRIL

5 – Registration begins for fall 2017  
16 – ABSN Spring classes end  
17-19 – ABSN Spring final exams  
19 - Spring graduate classes end

#### MAY

2017-18 packaging begins for returning students  
1 - FAFSA Priority Filing Date for returning students  
6 – Graduate final exams end  
7 – Summer term financial aid disbursement  
14 – DUSON spring graduation  
15 – ABSN Summer classes begin  
17 – Graduate Summer classes begin  
31 – Last day of summer Drop/Add.

#### JUNE

8 – ABSN Spring 2018 Financial Aid webinar  
16 – Renewal Financial Aid Awards available for all students meeting priority filing deadline

#### JULY

University Scholar announced  
1 – Fall 2017 Informatics scholarship deadline  
21, 28 - Spring 2018 ABSN Duke Days

#### AUGUST

7-ABSN Summer classes end  
10– Graduate Summer classes end  
11 – ABSN Summer exams end  
13- Graduate Summer exams end

- 18 - Fall financial aid disbursement
- 25 - Fall new student orientation financial aid presentations
- 28 – Fall classes begin

#### SEPTEMBER

- 8- Last day of Fall Drop/Add
- DUSON information session
- Fall 2017 exit loan counseling sessions
- 2016-17 financial aid annual data reporting

#### OCTOBER

- 6 – Fall break begins at 7pm
- 11 – Fall classes resume
- NCHED reporting

#### NOVEMBER

- 1 – Registration begins for Spring 2018
- 21 – Graduate Thanksgiving break begins at 10:30pm
- 22 – ABSN Thanksgiving break begins at 11:00pm
- 27 – ABSN Fall classes end
- 27 – Fall graduate classes resume
- 28 - ABSN Fall final exams begin

#### DECEMBER

- 1 – ABSN Fall final exams end
- 1 – Fall Graduate classes end
- 1 – Spring 2018 Informatics scholarship deadline
- 2 – Fall graduate classes end
- 9 – DUSON hooding and recognition ceremony
- 18 – Graduate final exams end

### **SECTION 3: FINANCIAL AID PROGRAMS**

Financial aid programs which are available to students attending DUSON are listed on the Financial Aid section of the School of Nursing website. The DUSON Financial Aid Office awards federal and institutional resources listed below based on the eligibility criteria outlined.

#### **Federal**

- Federal Grad PLUS Loan
- Federal Direct Subsidized Loan
- Federal Direct Unsubsidized Loan
- Nurse Faculty Loan Program
- Federal Nurse Anesthetist Traineeship

#### **Institutional**

- DUSON Need-Based Scholarship
- DUSON Merit scholarship
- University Scholars
- North Carolina Community College Faculty Scholarship
- Informatics scholarship

#### **Federal**

To be eligible to receive Federal assistance, a student must:

1. Be enrolled at least half time (4.5 credit hours Fall, 4.5 credit hours Spring, 3 credit hours Summer for Graduate Students; 6 credit hours/semester for ABSN and post-Bachelor's Certificate Students) in an eligible program of study.
2. Be a U.S. citizen, U.S. national, or U.S. permanent resident or reside in the United States for other than a temporary purpose (supportive documentation may be required to verify residency or citizenship status).
3. Maintain satisfactory academic progress in their course of study.
4. Not be in default of any loan or owe a repayment on a Federal Pell Grant, FSEOG, or State Grant.
5. Demonstrate financial need (if applicable).

Federal aid is awarded in accordance with the Department of Education guidelines. Federal loans are awarded after any grants or scholarships, and are applied toward any unmet cost of attendance.

### **Institutional**

All institutional scholarships are awarded prior to the student's first semester and carried throughout the student's DUSON career. These scholarships must be applied toward tuition.

The [University Scholars](#) program is a highly selective scholarship. All applicants to the school are considered based on their Admissions application. The top three applicants from each degree program (ABSN, MSN, DNP) are selected for nomination. The Program Directors and Associate Dean for Academic Affairs (ADAA) reviews the nominees and the ADAA selects the recipient to represent the School of Nursing.

[DUSON Need-based scholarships](#) are awarded to degree-seeking students who apply for financial aid based on the expected family contribution (EFC) on the FAFSA. Eligibility for graduate student need-based scholarship is based on the FAFSA EFC, the DUSON financial aid application, and the academic program of study, and awarded automatically through PeopleSoft as part of the student's financial aid package.

For ABSN students, in addition to the FAFSA, students must submit the CSS Profile and 2015 student federal tax return information. Students who are married must include 2015 federal tax information for his/her spouse. Students born after January 1, 1988 must also submit parent 2015 federal tax return information.

Qualified students receive a fixed award amount divided over six semesters for MSN students, five semesters for DNP students, nine semesters for Nurse Anesthesia students, and four semesters for ABSN students. Students with transfer credit or who have already completed required coursework would receive the scholarship for a prorated number of semesters.

[North Carolina Community College scholarships](#) are automatically awarded at an amount of 15% tuition per semester for eligible admitted students. No separate application is required.

[Informatics scholarships](#) will be awarded for two new fall 2017 students and two new spring 2018 students. Each scholarship covers up to \$20,000 of tuition to complete the student's MSN Informatics Program of study (\$10,000 per year for two years). Students may apply for this special scholarship one time only, prior to the first semester in which they are enrolled in the Nursing Informatics Program. The successful student can have the first year's \$10,000 Scholarship renewed in their second year for \$10,000. Non-degree students are not eligible to apply.

Students apply by completing a Qualtrics survey and submitting an essay as outlined on our website. The student information and essays, along with GPA information provided by OASS, are reviewed by a committee of Informatics faculty, who will then select the scholarship recipients.

[DUSON merit scholarships](#) are awarded to one student per program cohort (Fall 2017: 1-ABSN, 1-MSN, 1-NAP-DNP, 1-Post-Master's DNP; Spring 2018: 1-ABSN, 1-MSN, 1-Post-Master's DNP). Each scholarship is awarded for a fixed amount and number of semesters, and the total amount is equal to approximately 50% of the program's tuition. Students apply by submitting an essay to the Financial Aid office by the deadline posted on the Financial Aid website. The admissions committee from each program reviews the essays and determines the methodology for selecting the merit scholarship recipient. The Financial Aid office communicates that decision to all scholarship applicants.

**Cullman scholarships** are awarded to ABSN and MSN students participating in an eligible DUSON-sponsored global clinical immersion experience. Students participating in programs in the Caribbean or Central America will receive \$600 scholarships and students participating in Asia or Africa will receive \$300 scholarships.

Other institutional funds are grant funded and administered in accordance with the terms of the grant. If a separate application is required, that information is communicated by the Financial Aid section of the School of Nursing website. The Financial Aid and Business office work with the appropriate faculty and academic department staff regarding the application requirements, number of awards, and review process. Students are notified of scholarship decisions via email and/or hard copy letter.

#### **SECTION 4: STUDENT LOAN POLICIES AND PROCEDURES**

Student loan policies and procedures are created and maintained by Duke's Student Loan office. For more information, please visit their website: <http://financialaid.duke.edu/loans>.

#### **SECTION 5: STUDENT CONSUMER INFORMATION**

The staff in the Financial Aid Office recognizes that in order to understand the complications of Financial Aid, accurate and timely dissemination of information to consumers is vital. Several policies have been implemented to ensure appropriate dissemination is achieved. The consumer information policies are developed and maintained by the main Duke campus. For more information, please visit: <http://duke.edu/services/ethicscompliance/heoa/index.php>.

#### **Rights and Responsibilities of Students on Aid**

As a recipient of financial aid, there are certain rights and responsibilities of which students should be aware. These rights and responsibilities of students on financial aid are listed in the following documents:

1. The DUSON Bulletin
2. The Financial Aid Award Notification
3. The Master Promissory Note

Students have the right to know the:

1. Financial aid programs available at DUSON
2. Application process which must be followed to be considered for aid
3. Criteria used to select recipients and calculate need
4. DUSON refund and repayment policy
5. FAO policies surrounding satisfactory academic progress
6. Special facilities and services available for the handicapped

Students are responsible for:

1. Completing all forms accurately and by the published deadlines
2. Submitting information requested by FAO staff in a timely manner
3. Keeping the FAO informed of any changes in address, name, marital status, financial situation, or any change in student status
4. Reporting to the FAO any additional assistance from non-University sources such as scholarships, loans, fellowships, and educational benefits
5. Notifying the FAO of a change in enrollment status
6. Maintaining satisfactory academic progress
7. Re-applying for aid each year

A description of the fees for attendance is published in the DUSON Bulletin and the DUSON website. An estimated budget for the total cost of attendance is published on the DUSON Financial Aid award letter and tuition estimates are posted on the DUSON Admissions website. The refund policy is outlined in the DUSON Bulletin and on the DUSON website. A description of the academic programs offered at DUSON is listed in the DUSON Bulletin. Additional information may be obtained from individual departments.

Only information published, provided, or referred by Financial Aid Office staff is valid. Any additional information should be verified with staff from the Financial Aid Office.

Student retention and completion data is gathered by the Registrar's Office.

The Student Disability Access Office provides information and assistance to students with disabilities who are in need of special accommodations. This office should be contacted for additional information.

Information concerning accreditation is listed in the DUSON Bulletin. Additional information may be obtained from the Office of the Dean.

## SECTION 6: APPLICATIONS AND FORMS

### Application Process

As federal loans are the main resource offered to DUSON students, the FAFSA is the primary application requirement for financial aid and the federal EFC is the basis for determining financial need. The Duke School Code is 002920. The federal government now requires the use of prior-prior-year financial information, so the 2015 federal tax information should be used to complete the 2017-18 FAFSA.

A DUSON financial aid survey is also required for newly admitted degree-seeking graduate students to be considered for need-based scholarship and assists us in collecting additional information regarding the student, including outside resources received and any special circumstances. A CSS Profile is required for ABSN students wishing to be considered for need-based scholarship, as are relevant student/spouse/parent 2015 federal tax documents. All required tax documents should be submitted through the College Board's IDOC service.

Form links and deadlines are posted on the Financial Aid section of the School of Nursing website. In addition, deadlines are communicated to new ABSN students through a Financial Aid webinar and/or by email.

The FAFSA and additional application materials (if required) appear on the student's DukeHub/Applicant Self-Service as a To Do item until it has been completed.

Additional documents may be requested to complete processing of the aid request. Notifications of these additional required documents are sent to students by email. Below are documents which may be required.

1. Federal Tax Transcript – students selected for federal verification and not able to use the IRS data retrieval must request an official federal tax transcript from the IRS.
2. Verification Worksheet - a document which collects updated information submitted on the FAFSA. Students who are selected for verification must submit a federal verification worksheet by the **last day of classes** of the final semester of enrollment in the academic year. Dependent students must obtain a parent's signature. Independent students must obtain a spouse's signature if applicable. An Aid Administrator may request a Verification Worksheet to resolve conflicting documentation.
3. Citizenship/Residency Verification - a document which collects proof that the student has citizenship status eligible for financial aid purposes. For eligible noncitizens, Document Verification Request Form G-845 will be required, along with copies of the student's Department of Homeland Security documentation.
4. Non-Filer Statement – a document which verifies that a student did not file a tax return.
5. Certification of Separation – a document which verifies that a married student is separated and living separately from his/her spouse.
6. Employment Verification - a letter which verifies a student, spouse, or parent's change in employment status. This letter must be written by the current or former employer, whichever is appropriate.
7. Other documents as requested and communication by the Financial Aid Administrator.

### Application Review Procedure



Graduate applications are reviewed through survey reports in Qualtrics and saved on the shared drive. The Financial Aid Counselor updates the student's checklist in PeopleSoft to reflect receipt of the application and notes any outside awards or special circumstances. College Board materials are available for view through the College Board website and are also loaded by the Undergraduate Financial Aid office through an automated process into PeopleSoft and ImageNow.

The Financial Aid Director or Financial Aid Counselor runs a report for students within a specified program and admit term who have been accepted and have a FAFSA. This list is distributed to the Counselors to review and package the students (based on alphabet), with the Director assisting if needed during heavier packaging times. This list of students ready to package is also available within PeopleSoft in the Financial Aid Dashboard.

If students are missing information or if additional information is needed due to Federal Verification selection, the student is emailed notifying him/her of the missing documents, links to forms (if applicable), and where/how to send the information. If the student has made an error on the FAFSA (such as indicating Graduate Student and applying for the ABSN program), the student is instructed to go to <http://www.fafsa.ed.gov> and correct this information.

If student has submitted FAFSA and we did not receive it in our system, the FAFSA record (ISIR) is requested through the Department of Education via FAA Access.

### **DUSON Forms**

As previously mentioned, the DUSON financial aid application survey is required for newly admitted students as part of the need-based review process. This form assists with determining additional resources and benefits a student may receive (such as being a Duke employee) as well as the types of aid the student is interested in (such as Nurse Faculty Loan Program).

If a student is awarded a DUSON scholarship, they are directed to review the Scholarship Conditions and Restrictions, available on our website, and answer yes/no to the applicable questions within the DukeHub under the Financial Aid tab. This item appears on their DukeHub To Do list as well.

If a student has extenuating circumstances and is requesting a cost of attendance adjustment or professional judgment, the Financial Aid Counselor sends a form to the student to complete, along with any relevant supporting documentation, if applicable. This form is available on our shared drive. The cost of attendance credit hour survey is available on the DUSON Financial Aid website under Forms.

Forms are reviewed by the Financial Aid office on an annual basis and updated accordingly. Edits of online forms are submitted to dusonweb to update. If applicable, copies of forms are stored on the Financial Aid Shared Drive under Forms and Publications.

DUSON Financial Aid forms may be found on our website at: <http://nursing.duke.edu/financial-aid/financial-aid-forms>.

### **Deadlines**

Priority filing deadlines for all students are posted on the DUSON Financial Aid website.

2017-18 FAFSA is available until June 30, 2018. However, FAFSA information and any additional documents required for federal verification or to resolve FAFSA comment codes must be received to the school by the **last day of classes** in your final semester to receive a loan disbursement.

DUSON graduate students must apply for need-based scholarship prior to their first semester of attendance. For ABSN need-based scholarship applicants, all application materials must be submitted by the priority deadline to guarantee scholarship consideration. If additional scholarships are available, late scholarship applicants will be considered for these remaining funds.

All DUSON merit scholarship applications/essays must be submitted by the posted deadline for consideration. **LATE APPLICATIONS WILL NOT BE CONSIDERED.**

Additional school scholarship application and deadlines are posted on the Financial Aid section of the DUSON website.

North Carolina state fund deadlines are posted to CNFC.org (with links from the DUSON financial aid website).

Because institutional funds are limited, scholarship deadlines must be strictly enforced.

### **Document Assignment, Collection, and Tracking**

Financial Aid application information is stored electronically on the Financial Aid shared drive or in ImageNow. Relevant communications, special circumstances, or additional information may be added as a PeopleSoft comment. Information submitted by mail or fax are scanned and saved in ImageNow. IDOC tax documents are available on the College Board website and loaded into ImageNow. FAFSAs and CSS Profiles are stored electronically in PeopleSoft. PeopleSoft checklists are utilized to track receipt of financial aid application materials.

Students are notified of required documents through the Financial Aid section of the School of Nursing website and through financial aid presentations. A small percentage of students are selected for federal verification and/or require additional information, and the Financial Aid Counselor emails the student to inform him/her of the reason for the request and any required forms or next steps needed by the student. A PeopleSoft checklist is generated through an automated PeopleSoft process when a student is selected for federal verification or when a C flag appears on the FAFSA (such as to confirm citizenship, selective service registration, etc.).

Once additional information is received, it is directed to the appropriate Financial Aid Counselor to finalize the award and include the information in the student's electronic file in ImageNow. If the information is incomplete, the student is notified by the Financial Aid Counselor via phone or email.

Once federal verification is completed, the flag indicating verification status is flipped accordingly in PeopleSoft. The Financial Aid Director runs queries periodically for any students with Verification status at Required or Pending and sends to Counselors for review and follow-up. The Undergraduate Financial Aid Office periodically runs verification audit reports and sends to us as well.

When all required documents are received, the student is considered complete and ready to be packaged. The Financial Aid Officer gathers all documentation and creates a student folder for new students and updates previous year files for returning students.

### **Pre-Award Appeals**

Because we have limited scholarship funds available at the school, appeals of the scholarship award decisions are not applicable. We will consider appeals in light of valid professional judgment reviews, and those are generally initiated through conversations (email, phone, in person) between the student and the Financial Aid Counselor or Financial Aid Director. Financial Aid Counselors email an Appeal Form to the student to complete and submit, along with supporting documentation.

Triggers for appeals typically involve involuntary loss of employment by the student or spouse (or parent of a dependent ABSN student), high medical expenses, or child or elder care. Students are instructed to provide documentation of the change in income or out-of-pocket expenses for a particular time period (typically a calendar year for income and academic year for expenses). The appeal would be reviewed by the Financial Aid Counselor, with additional review by the Financial Aid Director as needed.

Students would be notified of appeal decision by email. Any change to a financial aid award would be available for view on the DukeHub as well.

## **SECTION 7: FILE REVIEW**

## Verification

Verification is the process of confirming the accuracy of student reported data on financial aid applications. Only a portion of the student population is selected for verification. Students are notified that they are selected for verification on the FAFSA Student Aid Report (SAR). In addition, the student is notified via email that he/she has been selected for verification.

The DUSON Financial Aid Office verifies only those applicants identified by the Department of Education (DOE) or if there is a discrepancy or a condition which is unusual and warrants investigation. DUSON systematically verifies only those data elements required by the federal government. However, Financial Aid Counselors may request additional information if further investigation is needed to resolve a discrepancy.

The DUSON Financial Aid Office is required to resolve any discrepancies discovered in a student's file, regardless of whether the student is selected for verification. The Financial Aid Counselor will request additional information from the student to resolve the discrepancy.

For students selected for verification, an automated process assigns a PeopleSoft checklist to the student. The Financial Aid Counselor sends an email to the student as a reminder of the specific items needed and to let the student know the information may be mailed, faxed, or scanned and sent electronically. **All verification requirements must be satisfied by the last day of classes of the final semester of enrollment for the academic year, or June 1<sup>st</sup> for summer term enrollment.**

## Verification Exclusions

In the circumstances below, student verification is not required. The Financial Aid Counselor documents the specific reason within PeopleSoft if any of the following applies:

1. An applicant who died during the award year.
2. A student who does not receive Title IV funds.
3. A student who is eligible to receive only unsubsidized loans.
4. A transfer student whose verification has already been completed by another school for the given aid year. *The FAFSA data must remain unchanged and a letter is required from that school stating that verification was completed and provided the FAFSA transaction number.*
5. Student was selected for verification after ceasing to be enrolled at the school and after all Title IV aid has disbursed.

For dependent students, parent data does not need to be verified if any of the following applies:

1. Both parents are mentally incapacitated.
2. Parents reside outside the U.S. and cannot be contacted by normal means.
3. Parents cannot be located because student does not have and cannot obtain contact information.

For married students, spouse data does not need to be verified if any of the following applies:

1. The spouse has died.
2. The spouse is mentally incapacitated.
3. Spouse resides outside the U.S. and cannot be contacted by normal means.
4. Spouse cannot be located because student does not have and cannot obtain contact information.

## Data Elements to be Verified and Required Documentation

For 2017-18, the Department of Education is using a customized verification process. Below is a list of items to be verified based on the student's verification tracking group, as well as a description of required documents.

V1: Standard verification group – verify all income sources, household size, and number in college.

V4: Custom verification group – verify high school completion status and identity/statement of educational purpose.

V5: Aggregate verification group – verify all elements incorporated into V1-V4.

#### Adjusted Gross Income and Taxed Paid

The adjusted gross income and federal taxes paid are verified through IRS Data Retrieval, which imports tax information from the IRS directly to the FAFSA. This may be completed during the initial FAFSA filing or as a FAFSA correction. If a student cannot or will not use IRS Data Retrieval, s/he must provide an IRS tax transcript for the student and spouses or parents, if applicable. Due to the issues with the IRS Data Retrieval functionality, signed copies of the 2015 tax returns may also be used in some circumstances.

If a student did not file a tax return, s/he must submit all W-2s as well as a signed verification worksheet listing any income for which a W-2 was not received.

#### Household Size

Household size is verified by comparing the Verification Worksheet to federal data. Discrepancies must be corrected before further processing.

Household size does not need to be verified if family size is:

- 1 Independent, single student
- 2 Independent, married student or dependent student with a single/divorced parent
- 3 Dependent student with married parents

#### Number in Postsecondary Institutions

Number of family members enrolled at least half-time in postsecondary institutions is verified by comparing the Verification Worksheet to federal data. Discrepancies must be corrected before further processing.

If the student is the only family member enrolled at least half-time in postsecondary institutions, number in college does not need to be verified.

#### High School Completion

The institution has verified high school completion status if the institution's admissions office obtains and retains, for the Title IV required record retention period, copies of students' high school diplomas or high school transcripts. However, the institution must ensure that the documentation is official and indicates that the student was awarded a high school diploma. An academic transcript that indicates the student successfully completed at least a two-year program that is acceptable for full credit toward a bachelor's degree is also acceptable documentation.

#### Identity and Statement of Educational Purpose

To verify identity and statement of educational purpose, a student must appear in person at the Financial Aid office and provide a valid, government-issued photo ID to confirm identity. The student must sign the Statement of Educational Purpose in the presence of an institutional official as well. *For distance education students only:* valid government ID must be shown to and Statement of Educational Purpose must be signed in front of a notary public. The original Statement of Educational Purpose must be mailed to the Financial Aid office.

#### Notification to Students

Students are notified of the results of verification by email, either through a financial aid award notification or revision communication generated through PeopleSoft or as a personal email sent from the Financial Aid Counselor.

#### Update and Correction Procedures

There are three situations whereby a Financial Aid Counselor may update student information. When students notify the aid office of an allowable update, the Counselor may recalculate the student's Expected Family Contribution and the new figure may be used to award financial aid. Updates may occur for:

- 1) Dependency status (Dependency status may not be changed for previously certified Direct Subsidized and Unsubsidized Loans, and may not be changed due to marital status)

2) Family size

3) Number of family members enrolled in a postsecondary institution

If corrections are needed after verification is completed, the student will be required to update the incorrect FAFSA information. This will result in an additional FAFSA being received. Once received, verification will be completed on the updated FAFSA information.

### **Database Matches, Reject Codes, & C-Codes Clearance**

For database match and c-codes on the FAFSA, an automated process assigns PeopleSoft checklists for any missing documentation. The Financial Aid Counselor emails the student, providing additional explanation of the required documents and how to send them. Financial aid awards are not final until the appropriate documentation is received and verified. Common FAFSA messages and required documentation to clear the message and proceed with a final financial aid award are listed below.

#### Social Security Administration (SSA)

The student is required to submit a copy of the social security card, confirming the name and SSN, or to correct the FAFSA if errors were made during the initial FAFSA filing.

#### Department of Homeland Security (DHS)

If the Department of Homeland Security could not verify the student's citizenship, the student must submit additional information.

US citizens or permanent residents must submit a copy of a US passport, birth certificate, or naturalization certificate confirming citizenship status. The checklist item is completed by the Counselor and a copy of the documentation is stored in the student file or electronically on the shared drive.

Eligible non-citizens whose A-number did not pass secondary confirmation by Homeland Security must bring unexpired immigration status verification documentation in person to the Financial Aid Office. The Financial Aid Counselor completes form G-845 and makes a copy of the front and back of student documentation. This information is sent to the Department of Homeland Security for review. No financial aid is awarded until we have received confirmation from the Department of Homeland Security regarding student's eligibility for federal financial aid or until **15 business days** after the date the documentation was sent, whichever occurs first.

#### Selective Service System

Males aged 18-25 are required to complete selective service registration. The Financial Aid Counselor will verify registration status at <http://www.sss.gov>. If the registration is not complete, the student is instructed to go to the website to complete registration. If the student is female, the FAFSA information is corrected and the checklist for additional documentation is waived.

Male students are exempt from selective service registration if any of the following are true:

- Current active duty military
- Not yet 18 as of the date the FAFSA is completed
- Born before 1960
- Noncitizens who first entered the US after age 26 or who entered the US as lawful nonimmigrants on a valid visa and remained in the US on that visa until after they turned 26

If the Financial Aid Counselor has adequate information to determine that the student is not required to register, the Financial Aid Office would note this in PeopleSoft and/or in the student file and proceed accordingly. Otherwise, the student will be asked to register or provide appropriate documentation regarding the selective service registration exemption.

If a student has not registered and cannot provide documentation of an exemption, he must contact the Selective Service to get a status information letter addressing his failure to register. This letter will be used to determine if the

student is exempt from registration or if he knowingly and willfully failed to register. If the student knowingly and willfully failed to register, he is not eligible for federal student aid.

### National Student Loan Data System (NSLDS)

If the student's FAFSA indicates that s/he is at or near the federal aggregate loan limit or may be in default or owes an overpayment, the Financial Aid Counselor pulls the student's NSLDS record and retains this in the student's file in ImageNow or notes this in a PeopleSoft comment. If the student is at or near a federal aggregate limit, the financial award is completed accordingly, to either omit any funding from the pertinent federal program or with a reduction from the standard award amount. If the student is in default or owes an overpayment, the Counselor contacts the student to request additional information before completing the financial aid award. Questions regarding the student's eligibility for federal loans are reviewed by the Student Loan office.

### Drug Conviction

If a student has a federal or state drug conviction during a period of enrollment for which the student was receiving federal aid, the student is disqualified from federal financial aid funding. Students self-report this information on the FAFSA. However, in situations of conflicting information, the School is required to confirm this information.

The student regains eligibility based on the timeline in the chart below (Please note - if the student is convicted for both possession and sale, the longer period applies):

	<b>Possession of illegal drugs</b>	<b>Sale of illegal drugs</b>
<b>1<sup>st</sup> offense</b>	1 year from date of conviction	2 years from date of conviction
<b>2<sup>nd</sup> offense</b>	2 years from date of conviction	Indefinite period
<b>3+ offenses</b>	Indefinite period	

Students regain eligibility one day after the period of ineligibility ends or after successfully completing a qualified drug rehabilitation program or passing two unannounced drug tests given by such a program. It is the student's responsibility to provide this documentation.

Qualified drug rehabilitation programs must include at least two unannounced drug tests and satisfy at least one of the following:

- Be qualified to receive funds directly or indirectly from a federal, state, or local government program.
- Be qualified to receive payment directly or indirectly from a federally-or state-licensed insurance company.
- Be administered or recognized by a federal, state, or local government agency or court.
- Be administered or recognized by a federally- or state-licensed hospital, health clinic, or medical doctor.

Students identified as ineligible due to a drug conviction (either through the FAFSA information or through confirmation of conflicting information) will be notified in writing of the loss of eligibility, as well as additional information regarding when and how to regain eligibility.

### **Review of Subsequent ISIR Transactions**

Queries are utilized to identify students with additional federal subsidized Stafford eligibility due to subsequent ISIR transactions. Audit queries are used to identify students who are in a federal overaward situation or who are no longer eligible for Perkins loan funding due to subsequent ISIR transactions. The ISIR download and review process is overseen by the Undergraduate Financial Aid office, and they send us query results to review periodically.

## **SECTION 8: STUDENT BUDGETS**

Student budgets are an important component in the financial aid process. Standard student budgets reflecting the DUSON average student population cost of attendance at a modest, but adequate standard of living are used to award financial aid. Special budget considerations are approved through the Professional Judgment process by the Financial Aid Counselor on a case-by-case basis.

## Budget Components

The Financial Aid Director collects information on an annual basis to prepare standard budgets by academic program and cohort/admit term. The budget components are as follows:

### Tuition and Fees

Tuition rates are approved by the Board of Trustees on an annual basis in late February. DUSON-specific fees are approved with tuition in February. All other University fees are approved by June. Tuition and fees information is available on the DUSON Admissions website under Tuition and Fees. ABSN students are charged a flat rate tuition per semester, as long as they are enrolled in at least 12 and not more than 16 credit hours. Enrollment above or below that level is charged at the DUSON graduate per credit hour rate. For Nurse Anesthesia and Post-Master's DNP students, tuition is budgeted in the financial aid award based on the standard curriculum for the program and cohort. After drop/add, budgets are adjusted to reflect the actual tuition charged, if it differs from the standard. For all other students (Master's, Post-Bachelor's DNP, and Certificate) an average tuition amount is included in the student budget. Average enrollment is determined using queries and pulling in the most recent data available for each semester. Students can request a professional judgment review to use actual tuition amounts instead of averages, and actual tuition amount must be used for all semesters of enrollment in the academic year. Loan fees are reviewed on an annual basis using the most recent data available. Loan fees are broken down by academic program. The loan fee semester average per program is used in the program budget. More information regarding the budget construction and data used is stored in the Financial Aid shared drive.

Technology fee, transcript fee, student services fee, and student activity fee are included for all programs. Health fee and health insurance are included for ABSN and Nurse Anesthesia students, although it may be added for other students if charged and on a case-by-case basis. Recreation fee is only included for ABSN students. A detailed breakdown of fees, amount, and semester charged may be found on the DUSON Admissions website under Tuition and Fees.

### Books and Supplies

Books and supplies are reviewed annually. A standard amount is budgeted per semester for all nursing students, regardless of program.

### Room and Board, Transportation, and Miscellaneous Expenses

Room and board, transportation, and miscellaneous expenses are set annually by the Karsh Office for Undergraduate Financial Support and based on a survey of graduate and professional students administered by the Duke Office for Institutional Research. The survey is conducted every three years and the average amount from the survey is used for all Duke University graduate and professional student budgets.

### Additional Transportation for Nurse Anesthesia Students

For Nurse Anesthesia students, an additional allowance is provided for average clinical site travel expenses (based on actual clinical site data provided by the Nurse Anesthesia program staff; more details may be found in the Financial Aid shared drive in the Budgets/2017-18 folder or by request).

### Health Insurance

All students are required to have health insurance. Students are given the option to purchase insurance through Duke University. These rates are set annually by Duke Student Health and is charged once a year (in the fall semester; a prorated rate is available for students beginning the program in the spring semester and charged in the spring semester only). Health insurance is included in the standard budget for ABSN and Nurse Anesthesia students, as they are enrolled full time and not able to work while enrolled. For all other students, health insurance is only included if requested and charged on the student's account.

## Budget Amounts

The Duke University School of Nursing charges by the credit hour, except for the ABSN program, which is charged a fixed rate per semester, with rates as follows:

	<b>2017-18</b>
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Graduate courses	\$1703/credit hour
ABSN students	\$20,721/semester

For cohort programs (ABSN, Nurse Anesthesia, and post-Master’s DNP), actual tuition is used based on the standard matriculation plan for the program. For Master’s, post-Bachelor’s DNP, and Certificate students, average tuition is used. Data is collected and reviewed on an annual basis using the most recent data available.

All student budgets include a standard allowance for housing, food, transportation, books, and miscellaneous expenses, as detailed below:

	<b>2017-18:</b>
Rent/Housing:	\$3872/semester
Food allowance:	\$2080/semester
Books/supplies:	\$450/semester
Transportation:	\$780/semester
Miscellaneous:	\$1532/semester

Health insurance is included as a standard budget item for full-time, cohort programs (ABSN, Nurse Anesthesia) **only** and is \$2950/year, charged in the fall. For students beginning in the spring, health insurance is prorated to \$1735/year.

### Special Budget Considerations

Upon request, Financial Aid Counselors may review, and if appropriate, adjust a student's budget. Students must submit complete the Cost of attendance PJ form with supporting documentation or tuition adjustment Qualtrics form (for tuition adjustments).

Examples of changes to standard budgets include, but are not limited to:

1. Child care - the cost of day care with dependent children may be added to a standard budget with appropriate dollar-specific documentation. Maximum allowance is \$1130/month for full day and \$565/month for ½ day of day care. Allowance is for costs incurred by the student during the months of enrollment in the aid year ONLY. Spouse/partner must be working or enrolled in school as well, and total expenses for the child are divided by two (shared equally between both parents). Allowance is for the student’s portion of expenses only. Maximum allowance based on Cost of Attendance for Graduate Schools distributed by the Karsh Office of Undergraduate Financial Support and saved on the Financial Aid shared drive or available by request.
2. Large out-of-pocket medical expenses – medical expenses incurred by the student during the months of enrollment that exceed the normal allowance provided by the Department of Education (generally about 2% of income) may be added to the student budget with appropriate dollar-specific documentation.
3. Additional educational expenses – educational expenses required for the degree and that are not included in our budget or exceed our allocation may be considered with dollar-specific documentation. This may include one-time purchase of a computer (not to exceed \$2500), books and supplies that exceed the allowance, health insurance charged to a Master’s, Certificate, or DNP student, or tuition charges that exceed the average tuition amount for Master’s, Post-Bachelor’s DNP, or Certificate students.

We cannot consider budget adjustments for living expenses to increase federal loan eligibility. However, you can submit dollar-specific documentation of additional living expenses in order to borrow from a private student loan.

### Budget Waivers

If a student receives a resource toward a budget item, the amount must either be included in the financial aid award as an outside resource (such as tuition benefits or stipends) or the budget item must be removed (such as a student living in military housing rent-free).

## SECTION 9: AWARDING AND PACKAGING FINANCIAL AID



## **Packaging Philosophies**

The DUSON Financial Aid office strives for an individual approach to financial aid awards. Scholarship funding is limited, and therefore is focused primarily on need-based awards in alignment with the School's strategic goals and distributed equitably over all degree programs. Students are offered financial aid to cover the full cost of the program, with Grad PLUS loan offered for graduate students enrolled at least half-time and additional loan eligibility amount noted for ABSN and Health Informatics Certificate students and graduate students enrolled less than half-time to meet any gap between institutional/federal resources and total cost of attendance.

The Financial Aid Director works with the Financial Aid Counselors to develop the packaging philosophy and guidelines. The Financial Aid office works in conjunction with the Business Office, Office of Admission and Student Services, and Program Directors to develop policies and procedures related to institutional scholarship awarding. The Associate Dean for Finance and Administration has oversight of all financial aid policies and procedures to ensure they are aligned with the school's mission. Final approval for institutional scholarship policies are made by the Dean of the Nursing school.

For graduate need-based scholarships, the student's FAFSA Expected Family Contribution, DUSON graduate financial aid application, and academic program are used to determine eligibility for the scholarship. All graduate financial aid applicants are considered for need-based scholarship, with no supplemental application required. Graduate scholarship awarding is automated through the PeopleSoft packaging plans and awards are for a fixed amount and number of semesters, based on the students program of study and any applicable transfer credits.

ABSN student must submit the FAFSA, CSS Profile, required 2015 federal tax returns with all schedules and W-2s (student, spouse, if applicable, and parent, if born on or after January 1, 1988) by the priority deadline to guarantee scholarship consideration. A set number of scholarships at various amounts, ranging from \$10,000-\$60,000 total, divided over the four semesters of the ABSN program, are available. First round admits meeting the priority deadline are reviewed and considered first. Students admitted from the waitlist who met the priority deadline are given next consideration for any remaining scholarships. After all priority deadline admitted students are considered, if any additional scholarships remain, late applicants will be reviewed and considered. Determination of scholarship eligibility and amount is made by the DUSON Financial Aid office.

Packaging guidelines and philosophies are evaluated by the Financial Aid Director on an annual basis. Need-based scholarship criteria are reviewed by the Financial Aid and Business offices on an annual basis to ensure awarding equity, alignment with institutional goals, and to meet budgetary considerations. Changes to the scholarship award amounts and criteria are sent to the Associate Dean, Finance and Administration for review and approval, with final approval made by the Dean of the School of Nursing. Merit-based scholarship awarding procedures are reviewed at least annually.

## **Available Funds & Number of Eligible Students**

The Business office and Financial Aid office work together to develop the eligibility criteria and award amounts for the need-based scholarship, with approval going through the Associate Dean, Finance and Administration. The Business office is responsible for institutional fund management, and communicates the specific fund award information to the Financial Aid office. Students receiving need-based scholarship are matched with a specific institutional scholarship fund through the Endowment Matching process in PeopleSoft, which is set up at least annually through collaboration between the SISS, Financial Aid, and Business office.

The DUSON Business Office oversees the institutional and HRSA grant funds and works with the DUSON Financial Aid office in the awarding procedure. Please see the Scholarships Award Manual, overseen by the Financial Management Analyst in the Business Office, for further details regarding this process.

## **Packaging Groups**

Need-based scholarships are awarded based on expected family contribution (EFC) and academic program. The EFC criteria and award amounts vary based on the following groups: 1. ABSN, 2. MSN (including post-Bachelor's DNP), 3. Nurse Anesthesia and DNP.

Scholarships are awarded for a fixed amount per semester for a set number of semesters. The standard number of semesters is 4 for ABSN students, 5 for post-Master's DNP students, 6 for Master's students, 9 for Nurse Anesthesia-DNP students and 11 for post-Bachelor's DNP students, unless the student has transfer credits or has already completed some courses toward the degree. In those cases, the number of semesters will be prorated accordingly.

Certificate and non-degree students are not eligible for DUSON need-based scholarships.

### **Package Construction**

Student files are reviewed upon receipt of a FAFSA and DUSON financial aid application. For ABSN, Nurse Anesthesia, and post-Master's DNP students, standard budgets are built based on cohort and the expected courses taken through the standard matriculation plan. For Certificate, Master's, and post-Bachelor's DNP students, an average tuition rate is used in the budget and to determine financial aid eligibility.

Students selected for verification are contacted regarding supplemental information needed before a financial aid award may be finalized.

The DUSON financial aid packaging policy is to offer assistance up to the total cost of attendance, so there is not any gap. Cost of attendance is defined as tuition and fees plus a standard allocation for books and living expenses.

Outside resources are considered first, then institutional scholarships/grants, followed by federal loans (direct subsidized loan, direct unsubsidized loan, and Grad/PLUS loan). If scholarship, grants, and federal loans do not cover the total cost of attendance or if the student is not eligible for federal aid, the remaining gap is packaged with "additional loan eligibility," denoting the maximum amount a student may borrow in a private loan.

Priority deadlines exist for ABSN need-based scholarship, as there are a set number of scholarships and various award levels available per incoming cohort. Deadlines exist for merit scholarship consideration as well as specialty scholarships, such as the Informatics scholarship. For graduate need-based scholarship consideration, we must have received a FAFSA and DUSON financial aid application by the first day of classes of the first semester of enrollment.

Federal methodology is used, and the cost of attendance minus EFC equals federal need. Any outside resources and scholarships are applied toward that need, and direct subsidized loan is awarded up to that need or up to annual limits (whichever is smaller).

The Financial Aid Director or Financial Aid Counselor runs ready list queries to determine who is ready to package. The query for first-year students looks for students who are admitted or matriculated, by degree (i.e. R-BSN, R-MSN, R-DNP) and admit term, who have completed a FAFSA. This list is saved on the Financial Aid share drive and communicated to the Financial Aid counselors. The query for returning students includes the specific academic program and academic plan information. These ready list queries are also available to view in PeopleSoft, within the Financial Aid dashboard, filtered by counselor and (for the new student list) by admit term.

Financial Aid counselors verify receipt of financial aid application and review information in PeopleSoft. If the student is selected for verification or if additional information is needed, the counselor emails the student. If the file is complete, the counselor reviews the FAFSA and application.

FAFSA information is used to verify eligibility for federal aid, and federal loan annual fiscal limits are monitored automatically. ABSN direct loan limits are based on 5<sup>th</sup> year undergraduate limits and whether the student is considered dependent or independent by the federal government. Outside scholarships or tuition benefits are manually awarded, as are ABSN need-based scholarship (if eligible) or Nurse Faculty Loan (if requested). The appropriate packaging plan is then selected for automated awarding of loan funds. Graduate need-based scholarship funds are automatically awarded based on the academic program, plan, FAFSA EFC, and packaging plan set up.

The packaging plans used by the DUSON financial aid office are listed below. The packaging plans award need-based scholarship first (if eligible, graduate students only), then direct subsidized loan (eligible ABSN and Health Informatics

Certificate students only), then direct unsubsidized loan, then Grad/Plus loans (for graduate students) or private loan eligibility (for ABSN and Health Informatics Certificate students). For graduate students enrolled less than half-time, the packaging plan is manually adjusted to reflect Additional Loan Eligibility in lieu of federal loans in the semester(s) of enrollment at less than half-time.

#### ABSN Student Packaging Plans:

<a href="#">NBSN-F,SP</a>	<a href="#">NBSN-Fall, Spring</a> (Returning Spring cohort students)
<a href="#">NBSN-FALL2</a>	<a href="#">NBSN-Fall Only</a> (Returning Fall cohort students)
<a href="#">NBSN 1ST</a>	<a href="#">NBSN-1st Year FL,SPR, SMR</a> (First year Fall cohort students)
<a href="#">NBSN SP SM</a>	<a href="#">NBSN-1st Yr SPR &amp; SMR</a> (First year Spring cohort students)

#### Graduate Student Packaging Plans:

<a href="#">NRS ALL</a>	<a href="#">Nursing - Fall, Spring&amp; Summer</a> (all students enrolled all three terms)
<a href="#">NRS FALL</a>	<a href="#">Nursing - Fall Only</a> (all students enrolled only for Fall)
<a href="#">NRS FL SPR</a>	<a href="#">Nursing - Fall &amp; Spring</a> (all students enrolled only Fall and Spring, not Summer)
<a href="#">NRS SPRING</a>	<a href="#">Nursing - Spring Only</a> (all students enrolled only for Spring)
<a href="#">NRS SPR SM</a>	<a href="#">Nursing - Spring &amp; Summer</a> (all students enrolled only Spring and Summer, not Fall)
<a href="#">NRS SUMMER</a>	<a href="#">Nursing - Summer Only</a> (all students enrolled only for Summer)

We have an automated process that runs weekly in PeopleSoft to assign and send an initial financial aid award notification email to students. For matriculated students, the award information is also available for view on the DukeHub, and an automated process runs weekly to provide matriculated students who have been awarded financial aid with access to the financial aid award information on DukeHub. For new students, financial aid award information will be available through Applicant Self Service once a student is admitted and the financial aid award is complete.

#### Packaging Other Educational Resources

Outside scholarships and grants are considered as a resource against federal need and cost of attendance. Students are asked to report other resources through the DUSON Financial Aid Application survey and through DukeHub. Chapter 33/VA benefits and Nurse Faculty Loan are applied toward the cost of attendance, but are not considered against federal need. External award and overaward queries help us monitor and ensure compliance against overawards and overpayments.

#### Health & Human Services Program Grants & Loans

DUSON periodically receives federal grant funds specifically for nursing students. A faculty member is the principal on the grant, and the Business office oversees the fund management for the grant. Students are identified through a PeopleSoft and/or Admissions query based on criteria for the grant, and specific application or supplemental materials may be requested. Notification of the award is communicated through the Financial Aid office, in conjunction with the faculty member and Business office.

#### Employer-Provided Educational Assistance

On our DUSON Financial Aid application survey, we ask students if they are receiving employer tuition assistance. We account for any tuition assistance in the financial aid award by listing it as Duke Tuition Benefit or Tuition Benefit-non Duke. Tuition benefits may factor into need-based scholarship eligibility and award amounts as well.

For Duke University Health System's RNTAP program, our Business office receives notification from the Office of Special Programs in DUHS Nursing Administration regarding eligibility each semester and forwards this to the Financial Aid office. These funds disburse to the student's Bursar account, and a placeholder item type named RNTAP is added to the student award to account for this resource.

#### Summer Awards

Summer is a standard semester at the School of Nursing. Therefore, packaging guidelines and availability of funds is the same in the summer semester as it is for fall and spring semesters – there is not a distinction or preference. Summer

semester is considered a trailer, so summer 2017 is part of the 2016-17 academic year and summer 2018 is part of the 2018-19 academic year.

Standard living, transportation, books, and personal allowances are the same for fall, spring, and summer semesters, as enrollment is expected for all three semesters/year round. Summer aid is packaged up front at the same time as fall and spring aid.

### **Award Package Notification**

All students receive a Financial Aid Notification (FAN) generated through an automated PeopleSoft CommGen process and emailed to the student. The award letter includes: cost of attendance, breakdown of individual aid awarded by term and source (including a separate listing for subsidized Stafford and unsubsidized Stafford), and financial aid office contact information (address, phone number, email address, website). Information is included regarding the process for receiving loans, namely that they must be accepted through DukeHub and the required paperwork for approval and disbursement. Additional information is added regarding the private loan process for NBSN career students and regarding the Grad PLUS loan process for NURS career students.

All active, matriculated students can also view the financial aid information on DukeHub. This lists the aid by individual source, specific cost of attendance, and award amount broken down by term. Award messages are included, describing federal and state grant sources and links to federal loan requirements.

Students receiving need-based scholarship are emailed through an automated PeopleSoft CommGen process and may also view the scholarship notification email on DukeHub once they have matriculated. They are prompted to review the restrictions and conditions of the scholarship online and indicate within DukeHub when they have completed this review, as well as responded regarding whether personal information may be shared with our Development office and donors.

Other scholarship notifications are made by email or hard copy letter, and including any specific terms and restrictions for the scholarship fund.

### **Packaging Appeals**

Students may submit documentation for appeals based on change to financial income, such as involuntary loss of employment by the student or spouse (or parent, for dependent ABSN students), or based on additional cost of attendance, such as child care or computer expenses.

Appeals are reviewed by the Financial Aid Counselor, with additional review by the Financial Aid Director as needed. Appeals resulting in a lower EFC may impact need-based scholarship eligibility ONLY if materials are submitted with the initial financial aid application. Need-based scholarship eligibility is determined in the first semester and automatically renewed; there is not an appeal/review process after that.

Appeals to cost of attendance would increase maximum Grad/PLUS or private loan eligibility. Appeals to income or other FAFSA data elements may not change aid eligibility.

The outcome of the appeal and additional aid eligibility (if applicable) is communicated to the student by email and through an adjustment to the financial aid award, if applicable. A revision email would be sent to the student with instructions to view the information on DUKEHUB.

The appeal process is as follows:

1. Request for appeal is communicated to the Financial Aid office.
2. Financial Aid Counselor emails the student the Appeal Form to complete and return with appropriate supporting documentation.
3. Completed appeal is reviewed by student's Financial Aid Counselor and/or Financial Aid Director.
4. Any applicable changes to FAFSA, cost of attendance, and/or financial aid award are made by the Counselor or Director.

5. Professional judgment is documented in PeopleSoft.
6. Student is emailed regarding the result of the appeal.

### **Award Package Revisions**

The Financial Aid Director runs queries after drop/add of each semester to determine changes to enrollment/tuition charges for cohort groups (ABSN, Nurse Anesthesia, post-Master's DNP). The Financial Aid Counselor updates student budgets and revises financial aid awards as needed.

The Financial Aid Director runs overaward queries weekly to determine overawards and overpayments. Financial Aid Counselor reviews the award and makes the necessary adjustments.

For changes in tuition, Nurse Faculty Loan is revised first, if applicable. Loan reductions are made in the following order: private (ABSN and Post-Bachelor's Health Informatics Certificate students) or Grad/PLUS (graduate students), direct unsubsidized loan, direct subsidized loan (ABSN and Post-Bachelor's Health Informatics Certificate students).

Overaward and tuition compare queries are also run at the end of the fiscal year as a final clean up. Revisions are made as quickly as possible after the query is run (typically the same day). The student is emailed notification of the change and referred to DukeHub for specific award details.

### **Overawards & Overpayments**

The Financial Aid office runs queries on a weekly basis to check for students who are currently overawarded. The overaward is typically due to a student reducing the number of credit hours of enrollment (for cohort programs), receipt of a subsequent FAFSA, or receiving a scholarship or other resource.

An adjustment is made to the student's financial aid award, reducing private or Grad/PLUS loans first, then direct unsubsidized loan, then direct subsidized loan. If possible, the overaward is resolved by reducing future loan disbursements.

If the additional resource must be applied toward tuition only, other funds that are specific to tuition (such as need-based scholarship and Nurse Faculty Loan Funds) may need to be reduced first.

Before returning funds already disbursed and creating a balance on the student account, we will review the budget to determine if there are additional expenses that warrant an increase to the Cost of Attendance. If loan disbursements have already been made and funds must be returned, the Student Loan office is notified of the funds that need to be returned.

The student is emailed regarding the change to the award and the reason.

## **SECTION 10: PROFESSIONAL JUDGMENT**

Students may submit documentation for professional judgment based on change to financial income, such as involuntary loss of employment by the student or a spouse (or parent, for dependent ABSN students), or based on additional cost of attendance, such as child care or computer expenses.

Professional judgments are reviewed by the Financial Aid Counselor, with additional review by the Financial Aid Director as needed. Professional judgments resulting in a lower EFC may impact need-based scholarship eligibility ONLY if materials are submitted with initial financial aid application.

Professional judgment requests to budget items would increase maximum Grad/PLUS or private loan eligibility. Professional judgment requests may result in no change in aid eligibility.

Professional judgment decisions are noted in PeopleSoft and emailed to the student. A revision email would be sent to the student if applicable, directing the student to view the information on DukeHub.

The professional judgment process is as follows:

1. Request for professional judgment is communicated to the Financial Aid office.
2. Professional judgment form is emailed to the student requesting additional information and documentation required.
3. Professional judgment request is reviewed by student's Financial Aid Counselor and/or Financial Aid Director.
4. Any applicable changes to FAFSA, cost of attendance, and/or financial aid award are made by the Counselor or Director.
5. Professional Judgment is documented in PeopleSoft.
6. Student is emailed regarding the result of the appeal.

## **SECTION 11: DISBURSEMENTS**

Financial aid disburses to the student's account no sooner than 10 days prior to the start of classes. Awards made during the semester disburse overnight through an automated PeopleSoft process. For information regarding loan disbursement policies and procedures, please refer to the [Student Loan office](#).

## **SECTION 12: SATISFACTORY ACADEMIC PROGRESS**

Federal regulations that went into effect July 1, 2011, require that DUSON establish and implement a policy to measure whether students applying for and/or receiving financial aid are making satisfactory academic progress (SAP) towards a degree. This regulation applies to all students applying for aid, whether or not financial aid has been previously received. Satisfactory Academic Progress (SAP) is the successful completion of degree requirements according to established increments that lead to awarding the degree within published time limits. There are three measurements that are used to determine eligibility: Credit Hour Requirement, Grade Point Average and Maximum Time Frame. Not meeting these requirements may result in loss of all financial aid.

### **Monitoring of Academic Progress**

Students' progress will be reviewed after grades are finalized at the end of each semester (fall, spring, summer). A determination of eligibility to receive financial aid for subsequent enrollment periods will be made at this time. Although DUSON will send a notification to the student, the student is fully responsible for monitoring their own academic progress as it relates to financial aid eligibility. The student should review their grades on an on-going basis and compare it to the standards set forth in this SAP policy to determine if they are meeting (or failing to meet) the established criteria. The SAP policy for Title IV aid recipients is aligned with the School's academic policy, and more information regarding academic policy may be found in each program's handbook.

Evaluations will be completed in a timely manner; however, the next term may be in progress at the time we are able to notify students of their ineligibility. Should the student be concerned that they may not have met the requirements, they may contact the DUSON Financial Aid Office. Students will be notified via their Duke e-mail account if they have failed the measurement. Students may appeal the decision. The appeal form and directions are located on our website.

There are three parts to the measurement and they are detailed by program below.

### **ABSN Students:**

1. *Qualitative*: Students must maintain a minimum GPA of 2.0 on a 4.0 scale.
2. *Quantitative*: Students must complete at least 67% of the credits attempted. Failing or incomplete grades will not be counted as successful completion. Only an incomplete that has been changed to a passing grade can be added to the number of hours completed for the semester of the original registration. It is the student's responsibility to notify the Financial Aid Office once an incomplete grade has been changed to a valid grade. Transfer credits and repeated coursework will be included in the number of credits attempted and the number of credits completed.
3. *Maximum Timeframe*: Students must complete the required course work within 87 credit hours, which is 150% of the published program length.

### **Graduate Students:**

1. *Qualitative*: Students must maintain a minimum GPA of 2.7 on a 4.0 scale.
2. *Quantitative*: Students must complete at least 67% of the credits attempted. Failing or incomplete grades will not be counted as successful completion. Only an incomplete that has been changed to a passing grade can be added to the number of hours completed for the semester of the original registration. It is the student's responsibility to notify the Financial Aid Office once an incomplete grade has been changed to a valid grade. Transfer credits and repeated coursework will be included in the number of credits attempted and the number of credits completed.
3. *Maximum Timeframe*: Students must complete the required course work within the time periods specified below:
  - Master's and Post-Master's Certificate Students – 5 years from matriculation
  - Post-Bachelor's DNP Students – 7 years from matriculation
  - Post-Master's DNP Students – 5 years from matriculation

### **SAP Warning**

Students who fail to meet the Qualitative or Quantitative guidelines at the end of the semester/payment period of review are automatically placed on financial aid warning status for one semester and notified of this status. The student continues to receive federal financial aid for this semester. If at the end of the semester/payment period, the student is now meeting all Satisfactory Academic Progress standards, the warning status is removed and the student is now in good standing.

### **SAP Probation and Appeal Process**

Students who are on a Warning status and do not meet all of the Satisfactory Academic Progress standards at the end of the next semester/payment period of review lose federal financial aid eligibility until they are making progress in all categories (see Regaining Financial Aid Eligibility section below). Students who lose eligibility for financial aid may appeal the decision by following the procedures outlined below.

Those wishing to submit an SAP appeal must indicate mitigating circumstances that occurred during the course of the semester in question, that could not have been anticipated prior to that period, and that adversely affected their ability to successfully complete their required coursework. To appeal, a student must submit a letter of appeal to the Financial Aid Office. The appeal letter should include the following:

- Mitigating circumstances that prevented the student from meeting the requirements of academic progress (i.e. death in the family, student illness or injury, other personal circumstances). Mitigating circumstances do not include: withdrawing from classes to avoid failing grades, pursuing a second major or degree, etc.
- Documentation that supports the student's basis for the appeal
- Steps the student has taken/will take to ensure future academic success. This plan should outline the student's academic goals for each period (e.g. number of credit hours and/or cumulative GPA) that will enable the student to meet the requirements of academic progress at a specified future point in time.
- Anticipated graduation date

In most cases, the SAP Appeals Committee will render a decision within two weeks of receipt of a fully completed appeal. All decisions of the SAP Appeals Committee are final. Notification of the decision will be sent via the student's Duke e-mail account.

If the SAP appeal is approved, financial aid will be awarded for the next semester on a probation period. An approved Academic Plan may be required as a condition of the appeal. An Academic Plan must be formulated with your advisor. Term and Academic Plans and/or other conditions of appeal approval will be included in the notification letter.

Students who fail to meet the requirements for Satisfactory Academic Progress for their probationary semester or do not complete the requirements of their academic plan (if applicable) will again be ineligible for financial aid and subject to the appeal process. Any subsequent appeal must include information regarding new extenuating circumstances or what has changed since the last appeal.

Students who meet the requirements for academic progress for their probationary semester will resume good standing and again be evaluated at the conclusion of the following semester/payment period.

If the SAP appeal is denied, financial aid will be cancelled. If you have been denied aid please review the section Regaining Financial Aid Eligibility below.

### **Regaining Financial Aid Eligibility**

Students denied financial aid after completing the appeal process or failing to meet their Academic Plan can regain full eligibility for financial aid by:

- Raising their GPA to the qualitative standard outlined above by degree
- Successfully completing coursework that will meet or exceed the minimum required for quantitative standard outlined above by degree
- Students who have reached their maximum time frame are not able to regain eligibility except in the case of a successful appeal of the maximum time frame requirement.

Students who are ineligible to receive financial aid may use one or more of the following payment options while attempting to regain eligibility: student's own resources, Duke Tuition Management Payment Plan, and/or Alternative/Private Educational Loans. Students who have taken the necessary measures to regain eligibility for financial aid must contact the Financial Aid office immediately upon doing so and apply for Reinstatement of Eligibility. The student's academic performance will then be reviewed, and if all required SAP criteria is met, full financial aid eligibility will be reinstated, effective the following semester.

### **SECTION 13: RETURN OF TITLE IV FUNDS**

Return of Title IV Funds calculations are approved by and policy is maintained by Undergraduate Financial Aid office. *Changes to federal law may affect this policy.*

#### **Process Overview & Applicability**

##### *Steps in Federally Mandated Process*

Step 1: Determine the withdrawal date.

If the student officially withdraws, the withdrawal date is the date DUSON determines the student either began the withdrawal process, or the date the student provided official notification to DUSON, in writing or verbally, of his or her intent to withdraw.

If the student does not provide official notification of his or her intent to withdraw, the withdrawal date will be determined as the date DUSON became aware the student was not attending class.

If a student does not return from an approved leave of absence, the withdrawal date is the date DUSON determines the student began the leave of absence. If a student takes a leave of absence that does not meet the requirements of an official leave of absence, the withdrawal date is the date the student began the leave of absence.

Step 2: Calculate the percentage of enrollment period completed. The percentage of enrollment period completed is determined by dividing the total number of calendar days in the enrollment period into the number of calendar days completed in that period as of the withdrawal date. The total number of calendar days in a payment period includes all days (including weekends) within the period. Scheduled breaks of at least five consecutive days are excluded from the total number of calendar days in the enrollment period and the number of calendar days completed in that period.

Step 3: Calculate the amount of Title IV aid earned. If the withdrawal date is equal to or greater than 60 percent of the enrollment period (semester), the student has earned 100 percent of the Title IV funding disbursed for that semester. If the withdrawal date is less than 60 percent of the semester, the amount of Title IV funding the student has earned is calculated by using the federally mandated calculation to determine the percentage of Title IV funds that have been earned by the student for that semester. This percentage is then applied to the total amount of Title IV funding that was



disbursable for the semester as of the withdrawal date.

Step 4: Determine the amount of Title IV aid unearned. The amount of Title IV funding the student has not earned is calculated by subtracting the amount of Title IV funding the student earned from the total Title IV funding disbursed/or was disbursable.

Step 5: Allocate unearned aid. DUSON is required to return the lesser of the total amount of Title IV funds the student has not earned or an amount equal to the charges if the total amount to be returned exceeds the charges incurred by the student. Charges include tuition and fees, and can include other education-related expenses assessed by DUSON. Unearned Title IV funds must be returned within 45 days of the student's withdrawal.

DUSON will return the student's unearned Title IV funding on his or her behalf and consider the returned funds as the student's debt to DUSON. Students must make arrangements with the Bursar's office for repayment of the debt. Consequences of non-payment include blocks on re-enrollment, transcript and diploma holds, and student account placement with Collections.

Title IV loan amounts to be returned by DUSON will be credited to the appropriate programs in the following order: Federal Direct Unsubsidized loans, Federal Direct Subsidized loans, Federal Grad PLUS or parent PLUS loans received on behalf of the student.

Step 7: Communication of return of funds. Students for which a portion of Title IV aid must be returned will receive a communication from the Financial Aid Office sent to their Duke e-mail address indicating an adjustment has been made and funds have been returned on the student's behalf. This communication further instructs any resulting balances on the student account must be paid by the student and arrangements for payment must be made directly with Duke's Bursar.

## **Withdrawal Date**

### *Policies*

The withdrawal date is determined by the student's academic dean and is the date the student began the withdrawal process, or the date the student provided official notification to their academic dean, in writing or verbally, of his or her intent to withdraw.

If the student does not provide official notification of his or her intent to withdraw, the withdrawal date will be determined as the date the academic dean became aware the student was not attending class.

If a student does not return from an approved leave of absence, the withdrawal date is the date the academic dean determines the student began the leave of absence. If a student takes a leave of absence that does not meet the requirements of an official leave of absence, the withdrawal date is the date the student began the leave of absence.

Students wishing to return from a leave of absence must receive approval from their academic dean.

### *Procedures*

Academic deans provide withdrawal dates to the Registrar and an official attrition notice is originated and emailed to appropriate departments.

## **Formula Calculation**

### *Policies*

Upon receipt of an attrition notice from the Registrar, the Financial Aid Office performs a return of Title IV funds calculation using the web based application provided by CPS Online:

<https://faaaccess.ed.gov/FOTWWebApp/faa/faa.jsp>

The period used for the calculation is "Payment Period," as all Nursing programs are standard credit hour programs.

The school calendar is determined by:

1. Calculating the days in the particular term/semester, from the first day of classes to the last day of finals.
2. Weekend days are included in the total number of days.
3. Breaks of five or more days are excluded.
4. When counting the number of days attended, the date of withdrawal is counted as a day attended.

Institutional costs are used to determine the amount of refund due from the school versus the student but do not change the amount of aid earned by the student. These costs refer to the original amounts charged to the student for educational expenses for the term of withdrawal and not pro-rated amounts used by the University based on the date of withdrawal. Required fees are included. Health insurance charged through the University can be included, but parking permits, parking tickets, flex account deposits, and similar non-academic expenses are not included.

Aid disbursed or aid that could have been disbursed is determined by:

1. Counting the aid accepted for the term/semester in question only.
2. Aid that could have been disbursed refers to aid accepted by the student and for which all paperwork/application materials and federal verification have been completed by the student.
3. If loan fees are taken out, the net amount disbursed or that could have been disbursed is used.

### *Procedures*

The attrition notice is received by the financial aid counselor. The counselor performs the Return to Title IV calculation on the web. The counselor saves a copy of the attrition notice as a PeopleSoft comment. The calculation is then sent to the Undergraduate Financial Aid Office for review. Once the calculation has been approved, the counselor adjusts the student's aid according to the calculation and notifies the Student Loan Office to return any loan funding within 45 days of the date of student withdrawal.

Once the calculation has been completed, a .pdf copy of the calculation and an electronic copy of the attrition notice are maintained on the shared drive.

## **Post-Withdrawal Disbursements**

### *Policies*

If an amount of Title IV aid a student has earned is greater than the amount of Title IV aid that has been disbursed, the difference is treated as a post-withdrawal disbursement to the student. Any post-withdrawal disbursement must be made within 180 days of the date the institution determines that the student withdrew.

Aid for which all requirements (paperwork/application materials and federal verification) have been satisfied is disbursed to the student account 10 days prior to the start of classes. Refunds of applicable aid are provided to the student immediately after the drop/add date for each semester.

### *Procedures*

If a student has *undisbursed aid for which all requirements have been satisfied*, a Return to Title IV calculation must be performed to ensure that funds for which a student was eligible and had earned at the time of withdrawal but had not been disbursed are offered as a post-withdrawal disbursement. The institution must disburse any amount of a post-withdrawal disbursement of grant funds that is not credited to the student's account as soon as possible but no later than 180 days after the date it is determined the student withdrew. A post-withdrawal disbursement of Title IV grants does not require permission from the student.

Written notification will be sent to the student or parent (for parent PLUS loans) within thirty (30) days of the date it is determined that the student withdrew and confirmation received before making any post-withdrawal disbursement of loan funds. The notification will include:

1. A request for confirmation
2. A confirmation deadline of fourteen (14) days or more
3. The type and amount of the loan funds it wishes to credit to the student's account or disburse directly

4. An option to accept or decline the post-withdrawal disbursement
5. A notice of obligation to repay loan funds
6. A notice the student or parent may not receive as a direct disbursement loan funds that the institution wishes to credit to the student's account unless the institution agrees to do so

A post-withdrawal disbursement must be made from available grant funds before available loan funds.

## Returning Unearned Funds

### *Policies*

The amount of Title IV funds the student has not earned is calculated by subtracting the amount of Title IV funds the student earned from the total Title IV funding disbursed/or was disbursable.

Unearned Title IV funds must be returned to the applicable Title IV program within 45 days of the date of the students' withdrawal. If the amount earned is greater than the amount that has been disbursed, the difference is treated as a post-withdrawal disbursement to the student. Unearned funds are returned to the Title IV programs within 45 days of the student's withdrawal by DUSON's Financial Aid Office and Student Loan Office on behalf of the student and consider the returned funds as the student's debt to Duke.

### *Procedures*

Students are notified via their Duke e-mail account that, as a result of withdrawal and pursuant to the Return to Title IV calculation, adjustments have been made to their aid package which may create a balance on the student account. Students must make arrangements with the Bursar's office for repayment of the debt if returned funds create an account balance.

Unearned Title IV funds are returned to the Title IV programs in the following order:

1. Direct Unsubsidized Loans
2. Direct Subsidized Loans
3. Federal Grad PLUS/Parent PLUS loans

## SECTION 14: INSTITUTIONAL REFUNDS

Institutional refund policies are outlined in the DUSON School Bulletin. Tuition adjustments are made based on the following unless otherwise specified on the withdrawal notice:

Tuition charges will be prorated based on the date of withdrawal as follows:

Date of withdrawal	Percentage of tuition charged
Before classes	0%
1st-2nd week	20%
3rd-5th week	40%
6th week	80%
After 6th week	100%

## SECTION 15: TITLE IV FRAUD

### Student Fraud

In reviewing reports, appeals, or in other secondary review of files [see Section 7: File Review for more information], discrepancies may arise. Discrepancies in student application materials [i.e. income,

citizenship, name, SSN, signatures] must be investigated and resolved. To do so, the Financial Aid office will contact the student to request additional information and documentation. If, in the Financial Aid Counselor's judgment, there has been intentional misrepresentation, false statements, or alteration of documents which have resulted or could result in the awarding or disbursement of funds for which the student is not eligible, the case shall be referred to the Director of Financial Aid for possible disciplinary action.

The Director of Financial Aid reviews the student's aid file with the Financial Aid Counselor and if the decision is made by the Director to pursue the possibility of denying or canceling financial aid, the Director will contact the student to set up an appointment. If the student does not make an appointment, the Director may:

1. Not process a financial aid application until the situation is resolved satisfactorily
2. Not award financial aid
3. Cancel financial aid
4. Determine that financial aid will not be processed for future years

Students and parents who willfully submit fraudulent information will be investigated to the furthest extent possible. All cases of fraud and abuse will be reported to the proper authorities. After investigating the situation, if the Director believes there is a fraudulent situation, he/she will refer all information to the Department of Education's (ED's) Office of Inspector General (OIG). The student may also be referred to the DUSON judicial process.

#### **Institutional and Third-Party Fraud**

Duke University's compliance policy, including how reports of suspected fraud are handled, may be found through Human Resources: <http://www.hr.duke.edu/policies/expectations/compliance/index.php>.

Under the American Recovery and Reinvestment Act of 2009 (ARRA), nonfederal employees who report waste, fraud or abuse connected to the use of ARRA funds may not be discharged, demoted or otherwise discriminated against because of his or her disclosure.

#### **SECTION 16: AUDITS**

All audit policies and procedures are maintained by the [Undergraduate Financial Aid office](#).