4.3 Verification

4.3.1 Selection for Verification

Verification is a process by which the Financial Aid Office compares the information on the financial aid application with the source documentation provided by the student to verify the accuracy of the application information. The CPS, for FAFSA, or CSAC, for CADAA, may select certain students for the process of verification. Students may be selected for verification for a variety of reasons, including when data elements present a data conflict, database mismatch, or at random. All students who are selected by the CPS/CSAC are required to submit approved verification documents to WCC prior to receipt of financial aid.

Additionally, WCC reserves the right to select additional students for verification if there is reason to believe this is in the best interest of the student and/or college. Once a student is selected for verification by WCC, the verification process and requirement for submission of approved documents is the same as if the student were to be selected by CPS/CSAC and submission of approved verification documents to WCC are required prior to receipt of financial aid.

At WCC, financial aid will not be awarded to those selected for verification until all documents required are submitted and the verification process has been completed. If a student withdraws from all classes before verification is completed, the student must provide the required documents within 120 days of the withdrawal date to receive a post-withdrawal disbursement. The ISIR or Cal ISIR, for FAFSA or CADAA, respectively, must be in the system on or before the withdrawal date to be considered for a Post-withdrawal disbursement.

4.3.2 Verification Documents

If selected for verification, a student must submit the completed items below prior to receipt of financial aid disbursement:

- A Verification Worksheet (independent or dependent – as appropriate) applicable to the verification group identified on the ISIR for FAFSA, or federal V1 verification group if selected on the Cal ISIR;
- Copies of appropriate federal tax transcripts (student, spouse, parent – as applicable)
    - If the IRS Data Retrieval Tool was used and the information was not changed (student, spouse, parent – as applicable), federal tax transcripts are not required and the items required to be verified do not require further documentation,
    - NOTE: As of 1/9/2019, income tax filers may submit signed tax forms in lieu of a tax transcript per Office of Postsecondary Education announcement posted 1/9/2019. For tax filers who filed an extension, the filer must submit a Verification of Non-filing, IRS Form 4868, copy of the IRS's approval of the extension, and W2s for all earned income sources.
    - Independent students and parents of dependent students who did not work and/or are not required to file taxes in 2016 must submit a Verification of Non-filing from the IRS. If unable to obtain this after attempts made, the individual may submit a signed and dated statement indicating he/she attempted to obtain the Verification of Non-filing and was unable to do so. This statement also must contain the following information:
        - The individual has not filed and is not required to file an income tax return, and

- A listing of the sources of any income earned by the individual from work and the amount of income from each source.

  In addition to the statement above, a non-tax filer must also submit copy of W2s for each source of employment income received by the individual for the income tax year 2016.
- Untaxed income verification required to be documented by applicable award year verification requirements, as outlined in the award year applicable Federal Student Aid Handbook (student, spouse, parent – as applicable),
- Other documentation supporting the verification process as required by applicable award year verification requirements, as outlined in the award year applicable Federal Student Aid Handbook (e.g. high school equivalency documents, identity documents, etc.)

4.3.3 Additional Documentation
Any conflicting data or special situation may require additional documentation for any student (whether selected for verification or not.) This verification will be requested in writing and must be provided by the student within the time period specified or processing of the student's aid application will cease. The authority to request any documentation deemed necessary and to withhold funds is expressly granted by ED.

4.3.4 Notification of Verification Requirements
Students will be notified via email to their YCCD student email account of the documents that must be submitted to the FAO in order to complete verification once the WCC FAO received the student's data. Such email message will list the required verification items, any other actions required to complete verification, and other actions required by the FAO. Need for additional documentation will be posted in WebAdvisor for students to view. Student may print required forms from email received or directly from the WCC FA Forms page, https://wcc.yccd.edu/student/financialaid/forms/. Students who fail to complete verification may lose their eligibility for financial aid, including campus-based awards, as these funds are awarded first-come, first-served to eligible students with completed files, and since funds are limited.

4.3.5 Verification Timelines
The following deadlines, regulated by the U.S. Department of Education, will be followed at WCC and can be located in the Department of Education Verification Guide.
Students selected for verification must submit paperwork for the 2018/2019 academic year by 12/14/2018, for fall 2018, and 5/17/19, for spring 2019, for any campus based program or Federal Direct loans.
All applications must be received at CPS by June 30, 2019, or by the last day of the applicable semester of enrollment, whichever is earlier. At WCC, the last day of the fall 2018 semester is 12/14/2018, and the last day of the spring 2019 semester is 5/17/19. Students who fail to turn in all documents required to complete verification by the appropriate deadline, will be ineligible for financial aid for 2018/2019.
The following deadlines pertain to 2018/2019 award year:
- June 30, 2019: CPS must receive student's electronic FAFSA
- June 30, 2019: Paper FAFSA must be received by CPS
- September 14, 2019: Corrections on Paper SAR must be received
- September 14, 2019: Corrections through FAFSA on the Web or FAA Access must be received

- September 14, 2019: Address and school changes through FSAIC deadline
- September 21, 2019: School must pay or offer to pay disbursements for student we have valid SAR/ISIR for with an official EFC and enrolled and eligible (for verified students, also met internal deadline for campus-based aid.)
- September 21, 2019: Deadline to receive valid output document to pay student Pell grant funds *or student's last date of enrollment, whichever is earlier.
- September 21, 2019: Deadline for students to complete Verification (but not more than 120 days since their last day of enrollment, whichever is earlier.)

NOTE: Students who fail to turn in all documents required to complete verification by the appropriate deadline will be ineligible for financial aid for 2018/2019. WCC reserves the right to cut off application earlier based on workload.

4.4 Analysis

4.4.1 Independent and Dependent Status
Student financial aid policy is based on the foundation of family responsibility for education financing. For dependent students, the primary responsibility for education financing resides with the parents. To the extent, the family cannot afford higher education; public programs may be available to help eligible students. A "Dependent" student is one who answers "no" to all dependency status questions on the FAFSA or CADAA, and is required to provide parents' income information and signature on such application. An "Independent" student is one who answers "yes" to one or more of the dependency status questions on the FAFSA or CADAA, and is required to provide his/her, and spouse's if applicable, income information on such application.

An "independent" student, for the 2018-19 award year, is one who meets at least one or more of the following criteria:
1) Born before January 1, 1995,
2) Married as of the date the FAFSA/CADAA is filed,
3) Working on a Master's or Doctorate in 2018-19,
4) Active duty in the US Armed Forces,
5) A veteran of the US Armed Forces,
6) Providing more than 50% of the support for his/her, or spouse's, child(ren),
7) Providing more than 50% of the support dependent(s) other than his/her children/spouse who are living with him/her,
8) A ward of the court, currently or was in foster care, or parents are deceased,
9) An emancipated minor,
10) In a legal guardianship,
11) Unaccompanied homeless youth as determined by high school/homeless liaison,
12) Unaccompanied homeless youth as determined by HUD, and/or
13) Unaccompanied homeless youth as determined by Director of a homeless youth center.

WCC has discretion to declare a student "independent" for reasons other than those above, but only in rare cases of extreme circumstance and through the Special Circumstance process outlined in section 7.2.

4.4.2 The Expected Family Contribution (EFC)

Each student's financial situation is evaluated through a needs analysis calculation, and the results are printed on the SAR using a number called the "Expected Family Contribution" or EFC. The EFC determines a student's eligibility for all forms of aid.

- If a student is "dependent", the parent's reported information is part of the needs analysis calculation.
- If a student is "independent", the student's, and spouse's if applicable, reported information are part of the needs analysis calculation.

The needs analysis calculation includes, but is not limited to the following data elements reported on the FAFSA or CADAA: income (taxed and untaxed), assets, family size, number in college, retirement needs, taxes and typical family expenses.

WCC has the discretion to exchange figures for some data elements used in the needs analysis calculation, but does not have the discretion to change the needs analysis calculation methodology. This discretion may be exercised in special situations where appropriate, and must meet the requirements set forth as described in Section 7.2 of this manual.

4.4.3 Analysis of Applicants Not Selected for Verification
Upon receipt of a FAFSA or CADAA, a student's file is reviewed in the following areas:

Educational Objective
Academic program
U.S. Citizenship
High School completion/equivalency
SAR codes, assumptions, messages
Selective Service status
Dependency status
Cost of attendance/budget
Satisfactory Academic Progress

If additional information is required, an email notification and request for additional items is sent to the student via YCCD email.

4.4.4 Analysis of Applicants Selected for Verification
In addition to the steps in Sec 4.4.3, a student selected for verification (by either the CPS, CSAC, or WCC) is reviewed in the following areas, which may vary depending on the verification group for which he/she is selected – V1, V4, or V5:

Adjusted gross income (AGI)
U.S. income tax paid
Education Credits
Untaxed IRA distributions
Untaxed pensions
IRS deductions and payments
Tax-exempt interest
Income earned from work
Household size
Number of household members in college
High school completion status
Identity/statement of educational purpose

4.4.5 Corrections and Update

If discrepancies are found between the documents submitted for verification and the information on the ISIR, the following procedures will be used for making the corrections:

- ISIR: Corrections to items listed in 4.4.4 above, must be made in FAA Access to CPS online, and a new need analysis performed. If the corrections result in a changed EFC, the data must be transmitted to CPS to produce an electronic student aid report. Student will receive an acknowledgement from the Central Processor.
- Cal ISIR: to items listed in 4.4.4 above applicable to federal verification group V1 only, must be made in WebGrants, and a new need analysis performed. If the corrections result in a changed EFC, the data must be transmitted to CSAC to produce an electronic student aid report. Student will receive an acknowledgement from CSAC.
- Award Changes: If corrections to the ISIR or Cal ISIR during verification result in a change in the student's award, the student's award letter will be updated. Students may log in and print their award using WebAdvisor.

The financial aid office will make any required corrections to student records identified during the verification process. Additionally, the financial aid office will make any required correction submitted by a student that is in accordance with appropriate guidelines and regulations. Students will be encouraged to use electronic correction capabilities offered through the ED and/or CSAC directly, as appropriate.

Corrections performed by the college will be done so by qualified financial aid staff, and will follow the procedure for application correction through the ED/CSAC and the institution.

Corrections performed by the student will be done online through fafsa.ed.gov, for FAFSA, or mygrantinfo.csac.ca.gov, for CADAA.

4.4.6 Financial Aid Technician Discretion
The Financial Aid Technician, in the process of verification, has the discretion to verify any additional application items and to ask the student to supply any documentation that may be needed to substantiate the student's financial aid application. If there is legitimate discrepancy between the application information and the verification document, the technician will note the reason for the discrepancy in the student's file, and add the request to WebAdvisor website and Colleague. These policies will be made available to students at the FAO upon request.

4.4.7 Referral of Fraud Cases
If WCC suspects a student, employee, or other person has misreported information or altered documentation to fraudulently obtain financial aid funds, the FAO will investigate, and appropriately report suspicions and provide any evidence to the Office of the Inspector General (OIG) per contact information in the most up-to-date Federal Student Aid Handbook available on ifap.ed.gov.

4.4.8 C-Flags
    4.4.8.1 Unusual Enrollment History (UEH)
    Since 2013/2014, Pell recipient and/or loan borrower students who have enrolled at multiple schools within the last 3 years may be flagged on their Student Aid Report (ISIR). The comment codes to designate UEH are 359 (2 schools) and 360 (3 schools). Students who are flagged with either code will have comments posted to their WebAdvisor

account. These students will need to complete the UEH form and submit Official College or University Transcripts for EACH institution they attended to the FAO. Technicians are to review the form and transcripts submitted. As part of the review process, the technician must check COD and NSLDS to ensure that all transcripts from each institution have been submitted. If students received credit for courses, the student may be packaged and paid. If they did not pass units in each semester attended, the FAO will make a decision of eligibility based on all transcripts received on a case-by-case basis per the intent of the UEH regulation.

There is no appeal process to this decision of eligibility based on the form and transcripts submitted.

4.4.8.2 Lifetime Eligibility Used (LEU)
On July 1st, 2012, new regulations went in to effect that limited the duration of a student's Pell Grant up to the BA degree to 12 full time equivalent (FTE) semesters. Unlike prior regulations that limited the Pell Grant to 18 semesters for student first enrolled on or after July 1, 2008, this new regulation had no grandfathering provision and goes back to 1973-74 to the start of the program. There is no appeal for the LEU. Students are tracked on the ISIR by ED, and applicable comment codes are loaded onto Colleague in the student's financial aid file. LEU must now be checked at the time of disbursement for 2018-19, and effective April 2013, reconciliation for Pell Grant has been lowered from 30 to 15 days. Colleague is set up to load files and prorate Pell Grant amounts, if the student's LEU is reduced due to new information, or if the amount of the award is less than one full year entitlement, effective for 2013-2014. Any Pell Grant overpayment due to LEU is most likely considered institutional liability/error, except in instances where another school was late to report their disbursement information.

4.4.9 Resolving Comments on the Institutional Student Information Record (ISIR)
The WCC FAO uses the annual *ISIR Guide* published by ED to identify ISIR comment codes requiring resolution. Per the applicable *ISIR Guide*, all comment codes requiring follow up by the school will generate an email to the applicant's YCCD email account identifying the steps and requirements for resolution. Student who are flagged for a comment code(s) requiring following up have a flag placed on their record in Colleague, and be provided a notification of such on his/her WebAdvisor account.
These students must submit appropriate forms and applicable documentation to resolve the comment code. Resolution of these comment codes must be complete prior to award packaging and disbursement.

4.4.10 Decline of Financial Aid
Due to LEU or other student-specific circumstance, some students may wish to "save" their Pell Grant, or other financial aid, for a University or other higher cost institution. A new form has been created to decline financial aid funds. Completion of this form/request, will not prevent packaging, but should be completed by the student and returned to the FAO to ensure no payment of aid despite maintenance of enrollment.

When the completed form is received by the FAO, the student's award amount(s) will be adjusted according to the request submitted by the student. The student may view changes to the award letter via their WebAdvisor account.

4.5   Review of Financial Aid Files

In addition to those mentioned in 4.4.3, in reviewing files for financial aid, the following is a list of items each technician is responsible for checking before approving students for awards:

4.5.1 Residency Status

Residency status is determined by the Admissions Office. The status is found in Colleague in the banner of the student's record on FASI.

4.5.2 Educational Goal

Verify that the student has a qualified education goal. The status will be found in Colleague in the banner of the student's record on FASI.

4.5.3 Ability to Benefit

WCC FAO does not accept an Ability To Benefit test as demonstration of high school equivalency, except when a student has completed one of the ability-to-benefit alternatives and is either enrolled in an eligible career pathway program or first enrolled in an eligible postsecondary program prior to July 1, 2012.
A student who meets this criterion must provide proof and submit documentation of such to the FAO prior to packaging of financial aid funds.

4.5.4 Satisfactory Academic Progress (SAP)

Students who do not meet satisfactory academic progress standards are considered DISQUALIFIED and must have a successful appeal in order to receive aid other than the CCPG. See section 7.1 for detailed information regarding SAP.

4.5.5 U.S. Citizenship

If a student is flagged for not passing/matching U.S. citizenship match, this item must be resolved before the student can be packaged. In general, CPS will match applicant data with SSA and/or DHS to verify the student is a U.S. citizen or eligible non-citizen. If DHS is unable to verify through the automated primary or secondary confirmation process or there is conflicting information, the WCC FAO is required to perform "third step verification."

The Financial Aid Technician will be responsible for performing the "third step verification" process by following these steps:
1) Request student's most recent, unexpired immigration document, and make a copy of it when submitted;
2) Carefully review the document against the status and document descriptions in the 2018-19 Federal Student Aid Handbook; and
3) Determine whether the student's immigration document supports eligibility for Title IV aid.
   - If the document doesn't support eligibility, stop at this step and advise student he/she is not eligible now, but may be eligible if he/she can provide eligible noncitizen documentation.
   - Prior to April 24, 2018, if the document does support eligibility, continue with the "third step verification" process by completing a Form G-845 and follow the instructions in the 2017-18 FSA Handbook Vol.1, Ch. 2.
   - On or after April 24, 2018, if the document does support eligibility, continue with the "third step verification" process using the SAVE system as outlined in the 2018-19 FSA Handbook, Vol.1, Ch. 2.

4.5.6 Drug Conviction

Effective July 1, 2000 a federal or state drug conviction can disqualify a student for financial aid. Such convictions only count against a student for aid eligibility purposes if they were for an offense that occurred during a period of enrollment for which the student was receiving federal student aid, unless the student was denied federal benefits for drug trafficking by a federal or state judge. A student who is ineligible for FSA due to drug conviction will receive an email notification to his/her YCCD email account of such determination, including the method by which the student may regain eligibility.

A student may regain eligibility the day after the period of ineligibility ends, per the 2018-19 FSA Handbook, Vol. 1., Ch. 1. Further drug convictions during a period of enrollment in which the student is receiving Title IV funds will result in ineligibility again.

Student denied eligibility for an indefinite period can regain eligibility after completing any of the following options:

1) Successful completion of a rehabilitation program, as described in the FSA Handbook, Vol. 1, Ch. 1.;
2) Having the conviction reversed, set aside, or removed from the student's record so that fewer than two convictions for sate or three convictions for possession remain on the record; or
3) Successful completion of two unannounced drug tests that are part of a rehabilitation program.

NOTE: A Federal, State, or local government program is administered or recognized by a Federal, State, or local government agency or court; has received or is qualified to receive payment directly or indirectly from a Federal or State licensed insurance company; or is administered or recognized by a Federally or State licensed hospital, health clinic or medical doctor.

For more detailed information regarding the impact of a drug conviction(s) on financial aid eligibility, and/or regaining eligibility after such conviction, inquire with the WCC FAO.

4.6 Student Budgets

Students who apply for financial aid as living at home and who then move away from home during the school year will have their budgets adjusted provided the student notifies the FAO of the change in status prior to October 1 of the award year and the change in status occurs prior to October 1 of the award year. The student contacts the FAO in order to have the change made. Students who apply for financial aid as at home and then move away from home, may request to have their budget adjusted. This request is self-certifying.

It is the philosophy of the FAO at WCC that if a student lives with, either the parents, or a relative, the benefits are the same. Thus, a student who is living with relatives will be treated as a student living at home and will be given an at home budget and will be packaged accordingly. Nine month budgets will be given to all students.

It is permissible, using professional judgment, to change the student's budget to more accurately reflect the actual expenses of the student. It is permissible, for example, to add dependent care or additional expenses for a disabled student, to a student's budget. It would also be permissible to remove the food & housing portion of the budget for a student who is not paying those expenses.

If a student has a child under the age of 12, or any dependent that requires care while the student is in school, dependent care expenses may be added to the student's budget on a case-by-case basis. The student may inform the FAO of the amount of dependent care to be paid by completing the professional judgement process, see section 7.2. A financial aid technician will add that amount to the student's budget, by calculating the nine-month amount.

12-month Budgets - A student who chooses to attend Summer school may be given a 12-month budget and awarded aid but only in the case where the student is both attending at least half-time, and where there is extreme financial need. For students attending in the Summer session, a year round twelve month budget will be added when the result of such allows the student to maximize his/her financial need. Thus, the student would be paid for any remaining eligibility that exists.

4.6.1 Development of Budgets (aka Cost of Attendance – COA)
Each year the California Community College Chancellor's Office (CCCCO) and the California Student Aid Commission (CSAC) publish documents describing ranges for the various elements of a student's budget. CSAC student budget figures are created because of student survey data collected by the CSAC, and WCC believes this to be a solid representation of costs students may incur. This student budget may also be referred to as the Cost of Attendance (COA).
Possible budget items include:
- Actual costs added to the standard budget on a case-by-case basis
- Costs for room and board, books and supplies, transportation, and personal needs are taken straight from the California Community College Chancellor's Office nine-month Student Expense Budget for 2018-2019.
- The tuition fee for 2018-2019 is $46 per unit, and is based on a full-time, 12-unit semester load, doubled for a full 9-month budget. This is also referred to as the resident tuition and fees; however, even non-residents are required to pay this fee.
- To calculate the average non-resident tuition, the same 12-unit per semester average is multiplied by the per unit non-resident fee, which is $210 per unit, and then doubled for a full 9-month budget.
- The health service fee for 2018-19 is $10 per semester, and is doubled for a full 9-month budget.
- The 12-month budget takes the amounts from the 9-month room and board, transportation and personal categories, divides each by 9 months and then multiplies the result by 12 months. Both per unit enrollment fees and non-resident tuition are calculated for the Summer on a 12-unit average. To arrive at the 12-month books and supplies budget, the 9-month book and supply budget is divided by two for the one semester budget, since the Summer average is calculated at 12-units for the term. These amounts are added together to determine the 12-month budget.

4.6.2 Budget Categories
Two budget categories are used at WCC: "At Home" and "Off-Campus". The "At Home" budget is assigned to students who live at home with parents as identified on the FAFSA, CADAA, or BOG application. The "Off-Campus" budget is assigned to students who are living off campus as identified on the FAFSA, CADAA, or BOG application. The budget category assignment is NOT related to the student's dependency status.

A student's budget category assignment may be updated through a correction to his/her application, or additional information collected from the student, which presents a data conflict.

For the Cal Grant program, new recipients must meet income and asset ceilings in order to qualify for the grant. With the recent passage of SB 70, renewal students will also be subject to the same requirements each year.

4.7 The Eligibility Calculation, Overawards, and Overpayments

4.7.1 The Basic Formula
Eligibility for student aid is determined by the following formula:
- Student Budget (COA) – Expected Family Contribution (EFC) = Financial Need

This calculation is performed after the needs analysis and budget assignment are complete and assigned to each student.

A student who has financial need based on the formula above may qualify for financial aid funds assuming all other eligibility criteria are met.

A student who has zero or less financial need based on the formula above does not qualify for financial aid even when all other eligibility criteria are met.

4.7.2 CCPG Minimum Need
If the student shows at least $1,104 of need, CCPG eligibility is established and the student is notified of his/her fee waiver award. The student is then considered for other forms of aid.

4.7.3 Transfer Monitoring
Transfer Monitoring is a requirement by ED, and alerts must be reviewed to ensure a student does not receive financial aid at more than one institution for the same period of enrollment, resulting in overaward. If a transfer monitor alert is received by WCC from ED, the FAO will review the student's record on COD to determine the appropriate course of action.

If it is determined the student received financial aid at another institution for the same period of enrollment, WCC FAO will contact the student for resolution, and the student is not eligible for additional funds until the alert is resolved and any resulting overaward is resolved.

If contact with the student is unable to be made, the student's award which caused the transfer monitor alert to occur will be returned to its source, and an email notification will be sent to the student advising of the change in disbursement and eligibility, including instructions for correction of action taken, if applicable.

WCC FAO uses the NSLDS and COD systems to verify transfer monitor alerts and resolve resulting issues regarding potential and/or actual overaward.

4.7.4 POP/MRR
An MRR (Multiple Reporting Record) and a POP (Potential Over-award Problem) occur when activity (i.e. disbursement) occurs on COD within 30 days of each other from more than one institution. The WCC FAO will be notified and will reach a resolution between WCC FAO and the other affected institution. If a resolution cannot be reached within 30 days, COD will pull back the disbursed funds from both institutions. Students cannot receive funds from more than one

institution at a time. If, for example, the student was paid in Summer at the other school, but WCC paid for Fall, this would be resolved, but if another institution paid for the same term, one institution must return the disbursement, and generally that responsibility lies with the institution who last disbursed to the student, or based on student preference.

4.7.5 Overawards and Overpayments

An overaward exists when a student's financial aid package exceeds his/her financial need, see formula in section 4.7.1. If a student's financial need is exhausted, and financial aid awards result in a negative financial need, this must be resolved, except in cases when a student does not receive a Title IV Federal Student Aid program award, and the award is based on criteria other than financial need (e.g. merit-based aid).

An overaward that is not resolved prior to disbursement is considered an overpayment.

An overaward exists when any of the following exist:

- Award made to a student enrolled in an ineligible program or a student who is not eligible for FSA program assistance;
- Award made to a student exceeds his/her program eligibility, e.g. Pell LEU, aggregate loan limits, annual limit to FSEOG, or Pell amount disbursed exceeds amount eligible per enrollment status, etc.;
- Student's aid package exceeds financial need per the COA and/or EFC on active ISIR/Cal ISIR;
- Student is receiving Pell at another institution for the same period of enrollment.

If an overaward of Title IV aid exists, this must be resolved. Generally, overawards are the responsibility of WCC to resolve and liability belongs to WCC, except in situations of specific overpayment situations where a student failed to return Title IV aid he/she is not eligible for.

4.7.6 Overaward Resolution

4.7.6.1 Pell Grants

Pell correctly determined does not consider other aid awarded as it is awarded based on the Pell Payment Schedule appropriate for the student's enrollment status, correct EFC and COA. Therefore, is a student's package is overawarded, WCC must attempt to eliminate the overaward reducing other aid first.

Pell grant awarded to an ineligible student is an overaward and must be resolved.

4.7.6.2 Campus-based Programs

Campus-based overawards exceeding $300 must be resolved; however, campus-based overawards $300 or below do not need to be resolved.

The $300 overaward tolerance for the Campus-Based programs is allowed only if an overaward occurs after Campus-Based aid has been packaged. The tolerance does not allow WCC to deliberately award Campus-Based aid that, in combination with other aid, exceeds the student's financial need.

4.7.6.2.1 Federal Work Study Program

Since wages earned cannot be returned, FWS can only be adjusted by reducing future earnings. If future earnings are adjusted, and an overaward remains to exist, WCC must reimburse the FWS program from institutional funds.

4.7.6.3 Direct Stafford Loans

If a student is packaged to receive more Direct Subsidized loan than he/she is eligible for, WCC may resolve this by replacing the undisbursed Direct Subsidized loan funds with Direct Unsubsidized loan funds.

If a Direct Stafford loan is already disbursed, and causes an overaward, WCC may resolve by one of the following methods:

- If the package includes a Direct Unsubsidized Loan, some or all of this loan can be adjusted so that it replaces the EFC, thus reducing or eliminating the overaward.
- If the second or subsequent disbursement has not been made, this can be reduced or cancelled.
- If the student is not eligible for the loan program for which he/she was disbursed, WCC must return any portion of the loan which it retained, and for loan funds disbursed directly to the student, WCC must contact the loan servicer of the loan funds that are outstanding, so that ED can issue a 30-day demand letter to the student.

If the overaward occurs after the loan has been fully disbursed, WCC does not need to adjust the loan. However, review to determine if any other FSA program award can be adjusted to eliminate the overaward must be completed.

If WCC disburses Pell grant or Direct Loan funds to a student who does not begin attendance in a term, WCC must return the funds to ED within 30 days of the date the institution became aware that the student did not attend the term.

4.7.7 Overpayment Resolution

4.7.7.1 WCC Responsibility

Any overpayment in the Pell Grant, or FEOG programs, for which WCC is liable must be resolved immediately by performing a negative transmittal, a.k.a. negative disbursement, to COD and returning the corresponding funds to G5, or disburse them to another eligible student.

WCC may attempt to collect this from the student; however, this does not become a debt the student owes to ED, and WCC cannot refer such student to NSLDS nor ED for overpayment.

4.7.7.2 Student Responsibility

If a student received more Pell Grant than he/she was eligible for because his/her eligibility decreased, WCC may adjust a future, anticipated Pell disbursement in the same award year.

If this is not possible, WCC must promptly notify the student to recover the overpayment and request full repayment. If the student fails to resolve the overpayment, or enter into satisfactory repayment arrangements for repayment, WCC must refer the student to NSLDS and ED for overpayment.

Referral to NSLDS and ED for overpayment will result in student's ineligibility for Title IV programs until the overpayment is resolved or the student enters into satisfactory repayment arrangements for repayment.

A student is not liable for repayment of overaward if the amount is less than $25, unless this is the remaining balance of an overpayment amount which was originally more than $25.

5.1 Academic Calendar, Payment Periods, and Disbursements

5.1.1 Academic Calendar

WCC's academic calendar is designed based on a fall, spring, and summer semester structure. All courses offered are done so within the pre-established begin and end dates corresponding with these standard term-based semesters.

Academic programs offered within the standard term, semester-based academic calendar are measured in credit hours.

The WCC FAO uses this academic calendar, and academic programs measured in credit hours, to establish standard term, semester-based budgets for financial aid eligibility.

5.1.2 Payment Periods

At WCC, each semester is considered a payment period. The fall and spring semesters are substantially equal in length at 18 weeks and 17 weeks, respectively. The summer term is either 6 weeks or 8 weeks depending on specific courses enrolled by a student.

5.1.3 Timing of Disbursements

Financial aid disbursements are made to students on a semester term basis, and may occur once or twice a semester depending on the aid program.

5.1.3.1 Pell Grants

Pell grants are disbursed to students no earlier than 10 days prior to the start of the semester term, and are disbursed in two substantially equal halves throughout the semester term, except summer term in which only one disbursement will be made.

5.1.3.2 Direct Stafford Loans

Direct Stafford Loans to first-year, first-time student borrowers may not have the first disbursement prior to 30 calendar days after the student's program of study begins.

Direct Stafford Loan disbursements are made to students on a semester term basis and are made in two substantially equal disbursements throughout the semester.

All financial aid disbursements are subject to eligibility verification at the time of disbursement and may be delayed if WCC FAO determines the student is ineligible at the time of disbursement.

Retroactive disbursements within the same award year only may be permitted if the student meets all required eligibility criteria for the aid program being disbursed.

5.2 Cost of Attendance (COA)

As mentioned in section 4.7.1, a student's financial aid package begins with the budget or Cost of Attendance (COA). This is the cornerstone of the student's financial aid eligibility and determines the amount of financial aid a student may receive.

5.2.1 Allowable costs
The COA is based on an estimate of a student's educational expenses for the period of enrollment. WCC uses the expenditure figures annually published by CSAC as part of the California state grant program. Students may request additional costs to be added to this list by submitting a special circumstance request for professional judgement, see section 7.2.
Allowable costs include:
- Tuition and fees
- Books and Supplies
- Transportation
- Room and Board
- Miscellaneous personal expenses (e.g. hygiene)

These allowable costs are adjusted for students who are enrolled only less than half-time for all semester terms. Allowable costs for students enrolled less than half time include only tuition, fees, books and supplies.

5.3 Calculating Pell Grant
Pell grant awards are made to students based on the 9-month EFC on a student's ISIR, the academic calendar described in section 5.1, and the COA for a full time student for a full academic year. These scheduled award amounts appear on the student's financial aid award letter available to the student on his/her WebAdvisor account and in the Colleague system on AIDE.

The maximum Pell Grant for 2018-2019 is $6,095.00, and the maximum EFC for the 2018-19 year is 5486.

A student's actual Pell Grant award is based on enrollment status and academic progress measured in credit hours. Enrollment status is calculated based on the following credit hours measurement for all three terms in the academic year – fall, spring, and summer.
- Full time: 12 or more semester credit hours
- Three quarter time: 9 to 11 semester credit hours
- Half time: 6 to 8 semester credit hours
- Less than half time: less than 6 semester credit hours

If a student does not enroll in a semester tem, he/she will not receive a Pell Grant payment for that term.

WCC consistently uses Pell Formula 1 for credit-hour term-based programs for all students as all eligible academic programs offered at WCC follow this structure. Pell Formula 1 divides the student's award by the number of terms in the academic program's academic year. Thus, a student's schedule Pell Grant award is divided by two for fall/spring enrollment, and by three for fall/spring/summer enrollment.

NOTE: Students are packaged based on fall/spring enrollment, and adjusted later in the academic year if enrolled in fall/spring/summer. Summer term is treated as a trailer for FSA programs at WCC.

5.3.1 Year Round Pell (YRP)

A student may be eligible to receive up to 150% of his/her Scheduled Award, and this is referred to as Year Round Pell or Additional Pell. This eligibility is denoted by the "Additional Eligibility Indicator" in COD, and must be indicated when processing an YRP award.

To be eligible for YRP, a student must be enrolled at least half-time. The additional Pell award is calculated on a semester term basis and enrollment status, same as other payment periods in the award year.

WCC assesses a student's eligibility for YRP in a similar manner as his/her regular Pell Grant award eligibility is assessed, except when a student is eligible for a YRP award, WCC will mark the "Additional Eligibility Indicator" in COD. WCC FAO will review the student's COA, EFC, and financial need for the award to ensure a student's YRP award does not cause an overaward. WCC FAO will also review the student's eligibility in award years that may crossover the semester term for which the YRP award covers, and request the student indicate from which award year he/she would like to receive the YRP award.

5.3.2 Pell Grant Lifetime Eligibility Used (LEU)
A student has a maximum LEU of 600%, which is equal to six full-time, full- year Pell awards.

A student who has LEU greater than 400%, and those greater than 500%, will be flagged on the ISIR, and WCC FAO will follow up on this flag by sending the student an email notification to visit the WCC FAO to discuss LEU. Upon inquire to the WCC FAO by the student, the FA Technician will review the student's LEU and make determination of the student's Pell Grant eligibility for 2018-2019.

A student who has LEU greater than 500% may not be eligible for a full year award at 100% depending on the final determination by the FA Technician upon review of the student's LEU.

A student who has LEU greater than 600% is not eligible for additional Pell Grant award. These students will receive an email notification from WCC FAO upon receipt of his/her ISIR advising of this ineligibility.

NOTE: A student's LEU may change throughout an award year without the prior knowledge to WCC FAO staff. As a result, a student's Pell Grant eligibility can change after Pell Grant disbursement and cause subsequent overaward/overpayment. If the change to LEU was made after packaging and/or disbursement of aid to the student, and was not contained in information used to determine the student's eligibility for financial aid at the time of packaging/awarding, the corresponding overaward/overpayment is the student's liability, not the school's.

5.3.3 Recalculation of Pell
A student's Pell Grant eligibility may change due to change in EFC as result of corrections. If EFC change results in reduced Pell Grant eligibility, and the student has not been paid all award disbursements, future award year anticipated disbursement amounts may be reduced to eliminate the overaward. If EFC change results in reduced Pell Grant eligibility, and the student has been paid all award disbursements, then the student has received an overpayment, see section 4.7.7 for resolution of overpayment.

A student's Pell Grant eligibility may change due to change in enrollment status. If this change occurs prior to the second disbursement date of the semester in which the enrollment status changes, the second disbursement will be adjusted by WCC FAO. After 60% in the semester term, the WCC FAO will no longer adjust a student's Pell Grant eligibility based on enrollment status changes.

A student who withdraws completely from a semester term is subject to the Return to Title IV policy, see section 7.3.2.

If a student's COA changes, WCC will adjust the student's Pell Grant award only if such award creates an overaward due to exceeding financial need.

5.4 Direct Stafford Loan Periods and Amounts
A student's Direct Loan award is calculated differently than Pell Grant award. Direct Loan awards have annual and aggregate loan limits based on grade level and dependency status. WCC may not certify a Direct Loan award for more than the:
- Amount the student borrower requests
- Student's COA
- Student borrower's annual or aggregate limit
- Student's financial need

5.4.1 Loan Period, Loan Amount, Progression, and SULA

5.4.1.1 Loan Period
At WCC, the loan period is the same as the student's period of enrollment for the academic year, fall/spring semesters. WCC does not certify Direct Stafford Loans for the summer term.
The academic period for which the loan period falls within is the same as the YCCD academic calendar, and is used to determine the loan period specific to the student's Direct Loan award.

A student's loan period may not exceed WCC's academic calendar for the 2018-2019 year.

A student's loan period may not be less than one semester term, and must be based on the student's period of enrollment.

5.4.1.2 Loan Amounts
Direct Stafford Loan awards are subject to annual and aggregate loan limits based on dependency status, see limits below.

Annual Loan Limits
    Dependent undergrad students:
    First year = Subsidized max: $3,500, with possible $2,000 additional Unsubsidized
    Second year = Subsidized max: $4,500, with possible $2,000 additional Unsubsidized

    Independent students:
    First year = Subsidized max: $3,500, with possible $6,000 additional Unsubsidized
    Second year = Subsidized max: $4,500, with possible $6,000 additional Unsubsidized

Aggregate Loan Limits

Dependent undergrad students: Subsidized max $23,000, with possible additional $8,000 Unsubsidized

Independent undergrad students: Subsidized max $23,000, with possible additional $34,500 Unsubsidized

NOTE: WCC does not participate in the PLUS loan program for 2018-2019.

5.4.1.3 Progression

WCC FAO uses the Standard Academic Year (SAY) definition by ED to monitor annual loan limits for Direct Loan awards for all academic programs offered. Summer term is not included in the SAY.

A student's progression through the SAY is monitored at the time of disbursement to ensure the student maintains at least half time enrollment throughout the SAY, not including summer term.

A student who has reached his/her annual loan limit cannot receive another Direct Subsidized or Unsubsidized Loan until he/she either begins another academic year, or in some cases, progresses within the academic year to a grade level with a higher annual loan limit.

A student who has reached his/her aggregate loan limit cannot receive another Direct Subsidized or Unsubsidized Loan.

NOTE: WCC FAO does not know at the time of loan certification if a semester term is the student's final term of enrollment in his/her program. Therefore, the WCC FAO will certify Direct Stafford Loan awards for single term at a pro-rated amount equal to half the annual award amount based on the loan period and number of payment periods within the loan period, e.g. fall only loan will be pro-rated at 50% of annual loan limit as the loan period for award year is fall and spring.

5.4.1.4 Subsidized Loan Eligibility Time Limitation (150% rule/SULA)

In addition to aggregate loan limits, a student's Direct Loan award is subject to SULA, which is a loan limit eligibility based on the passage of time. First time Direct Loan student borrowers may not receive Direct Subsidized Loans for a period that exceeds 150% of the published length of the academic program in which they are currently enrolled, including all past subsidized loans the student has received.

WCC FAO will review a student's Direct Loan history on NSLDS at the time of certification to verify Direct Loan award eligibility per SULA.

5.5 Awarding Campus-Based Aid

In addition to meeting general eligibility criteria for FSA funds, a student awarded a campus-based award may be need to complete other forms, applications, etc. associated with the campus-based program administration.

WCC participates in the Campus-Based programs, specifically FSEOG and FWS. WCC is a Title III institution, and as such, is not required to match campus-based program allocation.

5.5.1 FSEOG

At WCC, FSEOG award amount is $400 per semester, but may change based on ED allocated amount and number of eligible students per academic year.

WCC selects students for FSEOG who demonstrate the highest level of need by reviewing the ISIR data for the auto-zero EFC indicator. Assuming all other eligibility criteria are met, the student received a Pell Grant award, and depending on the allocation amount received from ED, all FSEOG recipients will hold an auto-zero EFC indicator value of "Yes".

WCC allows a student to receive only one FSEOG award per award year, and are paid on a payment period basis.

5.5.2 FWS

At WCC, students potentially eligible to participate in the FWS program are sent an email at the beginning of the award year notifying them of the potential FWS eligibility and steps to take if interested in a FWS award. A potentially eligible FWS student is one who:

- Has a valid, complete financial aid file, including complete resolution of verification, comment codes, and c-flags on the ISIR;
- Indicated interest in the FWS program on the FAFSA,
- Has unmet need at or above $1000,
- Holds a valid SAP status (e.g. not in termination status),
- Is enrolled in an approved academic program of study with a valid education goal, and
- Has a high school diploma or its recognized equivalent.

Any student who is interested in the FWS program, may complete an FWS Interest form in lieu of marking interest on the FAFSA.

A student who received the potential eligibility notification referred to above, or a student who submits a complete FWS interest form, may receive a FWS award by completing the new hire process.

New Hire Process

- The 2018-2019 Job Listing will be made available no later than the first day of instruction of the fall 2018 semester, August 13, 2018.
- FWS-interested students review the job listing and contact the supervisor listed for interview.
- Supervisor will interview students, choose a potential new hire, and submit new hire paperwork to the FAO for review of FWS eligibility.
- FAO will perform FWS eligibility check. If student is eligible to participate in the FWS program, an email notification will be sent to the supervisor and student with the date the student may begin FWS work, to also include the annual FWS award amount.
    - o FWS annual award amounts are based on the anticipated number of hours per week the student will work, the pay rate, and the number of weeks in each semester.
    - o FWS annual awards amounts are based on anticipated gross earnings, and are adjusted using net earnings upon reconciliation of earnings.
  If student is not eligible to participate in the FWS program, an email notification will be sent to the supervisor and student notifying of the eligibility decision and reason for ineligibility.
- An FWS-eligible student may not begin FWS employment until the WCC FAO has approved the student, and the student and supervisor received award notification mentioned above.

Students may work during periods of nonattendance as long as the student meets all FWS eligibility criteria for the semester term immediately following the period of nonattendance, assuming the earnings earned during the period of nonattendance does not cause the student to exceed his/her awarded amount for the semester term of award.

5.6 Packaging Aid

Continuing with the eligibility formula identified in section 4.7.1, a student must demonstrate need for financial aid based on the COA assigned by WCC and the EFC from the ISIR/Cal ISIR. If a student demonstrates financial need, WCC FAO will package the student with available and eligible awards.

5.6.1 Award System

After a student has met all non-financial eligibility criteria and the verification process is complete, if applicable, the Financial Aid Technician packages his /her award(s). Automated rules are established in Colleague to assist the Financial Aid Technician with packaging only award(s) for which the student is eligible. The award criteria for each program are listed in Section 6.

5.6.2 Packaging Priorities

The list below identifies the priority-packaging list for awards.
1. Federal Pell Grant
2. California College Promise Grant (CCPG)
3. California College Promise Program
4. FSEOG
5. Cal Grant
6. Chafee Grant
7. EOPS/CARE Grants
8. Student Success Completion Grant (SSCG)
9. National Service Award (AmeriCorps)
10. WCC Scholarships
11. Federal Work Study
12. Federal Direct Loan

NOTE: A student who is overawarded will have aid reduced in the reverse order of the above listed packaging priorities.

5.6.3 Award Letters

When a student's financial aid file is complete and packaged, he/she will be sent an email directly to his/her YCCD email account notifying them of the availability of their award letter, and to check it on WebAdvisor for the following: 1) An **Award Letter** which summarizes the student's budget, resources, eligibility and funds offered.