

WESTERN NEBRASKA COMMUNITY COLLEGE

President's Procedure

TITLE:	Financial Aid - Consumerism
DIVISION:	Student Services
CATEGORY:	Financial Aid
REFERENCE:	BP-502 Federal Title IV Funds Policy
NUMBER:	PP-504
DATE OF REVIEW:	March 12, 2019
APPROVAL:	President's Cabinet

Purpose

To establish procedures to meet the Title IV funding requirements applicable to consumerism.

Scope

This applies to various consumer groups including, but not limited to, current and prospective students, parents, current and prospective employees, high school coaches and counselors, and the general public.

Procedure

As required by the U.S. Department of Education, each institution of higher education that receives federal Title IV funds is required to collect, publish and disseminate various types of information commonly referred to as consumerism requirements. These disclosures must be provided to a variety of audiences at various times and in formats prescribed by the federal government. Institutions agree to provide this information when the president of each college signs the Program Participation Agreement with the U.S. Department of Education. These published procedures shall ensure compliance with that Program Participation Agreement.

Consumerism requirements fall under the following major headings: Basic Consumer Information Requirements; Student Right-to-Know Disclosures; Equity in Athletics; Loan Counseling; Drug and Alcohol Abuse Prevention Information; Misrepresentation; Campus Security; Family Educational Rights and Privacy Act. While many elements of each of the requirements above are contained in the College Catalog, Student Handbook, Class Schedules and various publications prepared by the federal government, the following requirements are stated for each consumer group for emphasis.

Consumer Groups

A. All Currently Enrolled Students and Current Employees

Required Disclosures:

Institution's annual campus security report in its entirety (pursuant to CFR 668.46)

How Disclosure is Accomplished:

Through publications, mailings, or electronic media sent directly to individuals. The College shall post its annual security report to its website, but as mandated by federal regulations, WNCC will send each individual a notice through U.S. mail, campus mail, or directly to an e-mail address that:

- Identifies the information required to be disclosed;
- Provides the exact electronic Web site address;
- States that, upon request, the individual is entitled to a paper copy; and
- Informs the individual how to request a paper copy.

When:

The College shall prepare and make the report available annually by October 1.

Individual College Procedure:

The Dean of Students, the Institutional Effectiveness Director, the Environmental Health and Safety Coordinator, and the College attorney are responsible for preparing the report. The Dean of Students or individual designated by the Dean of Students distributes it via WNCC email accounts to current WNCC employees and students. The report is published on the WNCC website on the pages for campus safety and consumer information

B. Currently Enrolled Students

Required Disclosures:

Notices about the availability of the following: 1) information on financial assistance available to students enrolled in the institution (pursuant to 34 CFR 668.42); 2) information on the institution (pursuant to 34 CFR 668.43); 3) the institution's completion or graduation rate, and if applicable, its transfer-out-rate (pursuant to 34 CFR 668.45); 4) information about students' rights under FERPA (pursuant to 34 CFR 99.7); and 5) information about athletic program participation rates and financial support (Equity in Athletics Disclosure Act) (pursuant to 34 CFR 668.47). Notices must be sufficiently detailed to allow students to understand the nature of the disclosures and make an informed decision whether to request the full report.

How Disclosure is Accomplished:

The College shall provide direct individual notice to each person. WNCC shall provide the required notice through direct mailing to each individual through the U.S. Postal Service, campus mail, or electronically directly to an e-mail address. The individual notice provided to students must 1) identify the information required to be disclosed; 2) provide the exact electronic website address where the information can be found; 3) state the upon request the student is entitled to a paper copy; and 4) inform the student how to request a paper copy.

When:

- WNCC shall provide notice to each enrolled student. Immediately upon request, the College will provide the full report.
- WNCC will prepare its completion or graduation rate and transfer-out information by July 1 each year, immediately following the point in time at which the 150% of the normal time for completion or graduation has elapsed for the cohort on which the College bases its completion/graduation and transfer-out rate calculations.
- The College shall include an Annual Notification of Rights under FERPA in the Annual Security Report by October 1.
- The College will prepare and make available information about athletic program participation rates and financial support (Equity in Athletics Disclosure Act) by October 15.

Information on the institution and its financial assistance programs will be current.

Individual College Procedure:

The Office of Institutional Effectiveness prepares Student Right-to-Know data and posts those on the Institutional Effectiveness web site, which is also linked to the Consumer Information page. The EADA report is distributed by the Public Relations and Marketing Office. The Clery report is distributed by the Dean of Students or an individual designated by the Dean of Students. The Dean of Students or designee also notifies all enrolled students about Consumer Information and provides link to web page in same communication as the Clery notice.

C. The General Public

Required Disclosure:

A report on athletic program participation rates and financial support (Equity in Athletics Disclosure Act) (pursuant to CFR 668.47) shall be prepared and disclosed via appropriate publications, mailings, or electronic media.

When:

WNCC must prepare the report annually for the preceding year and have the report available by October 15.

Individual College Procedure:

The Athletic Director, Accounting Services Assistant Director, and Institutional Effectiveness Director collaborate to prepare the EADA report. The report is distributed via email to all currently enrolled students and current employees with a link to a PDF of the report on the website.

D. Prospective Students

Required Disclosure I:

Information on **financial assistance** available to students enrolled in the College shall include:

1. The types of need based and non-need based federal, state, institutional, and private sources.
2. How students apply and how eligibility is determined.

3. How aid is distributed among the students.
4. The rights and responsibilities of students receiving aid.
5. How and when aid is disbursed.
6. The terms and conditions of any employment.
7. The terms of, the schedules for, and the necessity of loan repayment and loan exit counseling.
8. The criteria for measuring satisfactory academic progress and how, if a student fails to achieve progress they can reestablish eligibility for aid.

Required Disclosure II:

General information about the College shall include:

1. The names of associations, agencies, and/or governmental bodies that accredit, approve, or license the College and its programs, and the procedures by which a student may receive a copy for review of the College's accreditation, licensure, or approval;
2. Special facilities and services available to disabled students;
3. The costs of attending the College (tuition, fees, room and board, books, transportation costs, supplies and any additional costs that are program specific in which the student is enrolled or has expressed an interest;
4. A statement of the requirements for the return of Federal Student Aid funds when a student withdraws from school, information about any refund policy of the college, and the requirements for officially withdrawing from the school;
5. The degree programs, training, and other education offered;
6. The availability of a GED program for colleges that admit students who do not have a high school diploma or equivalent;
7. The instructional, laboratory, and other physical plant facilities associated with academic programs;
8. A list of the faculty and other instructional personnel;
9. Who to contact for information on student financial assistance and who for general institutional issues;
10. That a student may be eligible for Federal Student Aid program funds for attending a study abroad program that is approved by the home school (WNCC does not offer a study abroad program at this time); and
11. Information regarding the availability of Federal Student Aid funds for study abroad programs.

Required Disclosure III:

Information about **students' rights under FERPA**.

Required Disclosure IV:

Notice about the availability of the College's **annual campus security report** to include: a list of information in the report, a brief description of the required disclosures that would allow students to understand the nature of the disclosures and make an informed decision about requesting the full report, and finally the opportunity for the student to request a paper copy of the report.

Required Disclosure V:

The College's **completion or graduation rate**, and if applicable, its **transfer-out rate**.

Required Disclosure VI:

Information about **athletic program participation rates and financial support**. Colleges that provide athletically related student aid must report three completion rates and three transfer-out rates, if applicable.

1. The completion or graduation rate for the general student body,
2. The completion or graduation rate for the members of the cohort who received athletically related aid (by race and gender within each sport),
3. The four-year average completion or graduation rate for the four most recent completing classes of the cohort categorized by race and gender for the general student population, and for race and gender within each sport. Information that is required by sport must be broken down into the following categories: basketball, football, baseball, cross-country and track combined, and all other sports combined.

The College may exclude from the athletic cohort the student exceptions specified under Student Right-to-Know Disclosures.

In addition to the completion and graduation rates and the transfer-out rates, colleges must report:

4. The number of students, categorized by race and gender, who attended the school during the year prior to the submission of the report, and
5. The number of those attendees who received athletically related student aid, categorized by race and gender.

How Disclosure is Accomplished:

Directly to a prospective student through appropriate publications, mailings, or electronic media.

When:

Prior to a prospective student enrolling or entering into any financial obligation with an institution, the institution must provide its report on completion, graduation and-transfer-out rates. The College must immediately provide a copy of the full annual security report and/or the complete report on completion, graduation and, if applicable, transfer-out rates to any prospective students.

Individual College Procedure:

The Admissions Office provides a notice to each student who is accepted for admission to the College that provides a description of the disclosures in I through VI above, and provides the web link to access the information. The notice is included with the Admissions Office's acceptance letter. The notice provided also includes instructions for obtaining a paper copy of the report.

E. Prospective Student Athletes and Their Parents, High School Coaches and Guidance Counselors

Required Disclosure:

WNCC is attended by students receiving athletically related student aid so the College is required to produce a report on the completion and graduation rates of student athletes pursuant to 34 CFR 668.48.

How Disclosure is Accomplished:

The information will be provided directly to the respective parties. It may be provided in writing or through electronic mail but not simply by posting it to a website.

When:

The information must be provided at the time WNCC makes an offer of athletically related student aid to a prospective student. The report must be produced annually by July 1.

Individual College Procedure:

The Athletic Department provides the information about how to access the report, and what specific information it contains, along with the letter of intent, either electronically, or as attachment, when delivered in person.

F. Prospective Employees

Required Disclosure:

A notice about the availability of the annual campus security report must be provided to each prospective employee of WNCC. The notice must include a list of the categories of information required for disclosure as well as a brief description that provides enough detail from which a person could make an informed decision to request the full report.

How Disclosure is Accomplished:

In response to an inquiry about employment, WNCC must provide direct individual notice to each prospective employee. The required notice may be provided by direct mailing through the U.S. Postal Service, campus mail, or electronically to an e-mail address.

When:

The institution must prepare the annual campus security report by October 1 of each year. Immediately, upon request, the institution must provide the full report to any prospective employee.

Individual College Procedure:

The College's Human Resources office is responsible for providing a direct individual notice to prospective employees of the College. Human Resources shall include language in all Applications for Employment on how to access the College's Annual Security Report. In addition, Human Resources shall provide a notice on the College's website identifying the information required to be disclosed, provide the exact electronic website address where the information can be obtained, state that a paper copy will be provided upon request, and inform the prospective employee how to request a paper copy of the full report.

G. Faculty, Students and Employees

Required Disclosure:

Drug and alcohol prevention information pursuant to public law 101 – the disclosure must include: information on preventing drug and alcohol abuse; standards of conduct that prohibit, at a minimum, the unlawful possession, use, or distribution of drugs and alcohol by students and employees on college property; a description of the sanctions for unlawful possession, use, or distribution of illicit drugs and alcohol; a description of any counseling, treatment, or rehabilitation programs available to students and employees; a description of

the health risks associated with the use of illicit drugs and alcohol; and a clear statement that the college will impose sanctions on students and employees of violations of the standards of conduct and a description of the sanctions, up to and including expulsion, termination of employment, and referral for prosecution.

How Disclosure is Accomplished:

WNCC will produce an annual notice to be communicated to all faculty, students and employees in October of each year. A similar notice shall also be communicated to any new students or employees who matriculate after the date of annual distribution. Distribution shall be in writing and may be accomplished through electronic communication unless the College has a reason to know that the individual cannot use that method of communication, in which case the communication shall be made in an alternative format.

When:

At least once per year, all students who enroll and all employees shall receive this required information.

Individual College Procedure:

The Dean of Students shall designate an individual responsible for this annual notification to the campus community. The publications, forms, and websites used to insure the above information is disseminated shall include the following:

- Drug and Alcohol brochure;
- *Student Handbook*;
- *Residence Life Handbook*;
- Annual Security Report; and
- Biennial Report.

In addition, drug and alcohol policies and related information shall be included in the *Employee Handbook*.

Revising this Procedure

This President's Procedure supersedes any prior WNCC policy, procedure, guideline or handbook on this subject matter.

WNCC reserves the right to revise this procedure, as necessary, or as new laws require attention.