# Table of Contents

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mission Statement</td>
<td>3</td>
</tr>
<tr>
<td>Financial Aid Policy</td>
<td>3</td>
</tr>
<tr>
<td>Financial Aid Programs</td>
<td>4</td>
</tr>
<tr>
<td>Pell Grant</td>
<td>4</td>
</tr>
<tr>
<td>Work Study</td>
<td>4</td>
</tr>
<tr>
<td>Federal Supplement Educational Opportunity Grant</td>
<td>5</td>
</tr>
<tr>
<td>Federal Direct Loans</td>
<td>5</td>
</tr>
<tr>
<td>Direct Plus Loans</td>
<td>6</td>
</tr>
<tr>
<td>Managing Student Loan Debt</td>
<td>6</td>
</tr>
<tr>
<td>Awards</td>
<td>7</td>
</tr>
<tr>
<td>Processing Applications</td>
<td>8</td>
</tr>
<tr>
<td>Withdrawals</td>
<td>9</td>
</tr>
<tr>
<td>Return of Title IV Funds</td>
<td>10</td>
</tr>
<tr>
<td>Satisfactory Academic Progress</td>
<td>11</td>
</tr>
<tr>
<td>Definitions</td>
<td>12</td>
</tr>
<tr>
<td>Default Management</td>
<td>13</td>
</tr>
<tr>
<td>Default Prevention/Management Plan</td>
<td>14</td>
</tr>
<tr>
<td>Initial Enrollment/Application</td>
<td>15</td>
</tr>
<tr>
<td>Communication</td>
<td>16</td>
</tr>
<tr>
<td>Prevention and Retention Staff</td>
<td>16</td>
</tr>
<tr>
<td>Late Stages of Enrollment</td>
<td>16</td>
</tr>
<tr>
<td>Withdrawals</td>
<td>16</td>
</tr>
<tr>
<td>Tracking</td>
<td>17</td>
</tr>
<tr>
<td>Appendices</td>
<td>22</td>
</tr>
<tr>
<td>Direct PLUS Loan Application</td>
<td></td>
</tr>
<tr>
<td>Direct STAFFORD Loan</td>
<td></td>
</tr>
<tr>
<td>Dependent –Student Verification Worksheet</td>
<td></td>
</tr>
<tr>
<td>Independent-Student-Verification Worksheet</td>
<td></td>
</tr>
<tr>
<td>Entrance Counseling Form</td>
<td></td>
</tr>
<tr>
<td>Exit Counseling Form</td>
<td></td>
</tr>
</tbody>
</table>
Mission Statement

The office of Financial Aid is committed to providing financial assistance through grants, loans and scholarships, to enrolled students who meet the eligibility requirements; and who demonstrate a need for financial assistance and a desire to further their education.

Financial Aid Policy

Clinton College seeks to provide assistance to students enrolled in eligible programs who demonstrate financial need and have a desire to attend college. The types of aid available include federal grants, scholarships, and limited Federal student loans. All students are encouraged to apply at least six to eight weeks in advance of the term they plan to enter.

Financial need is determined by a standard needs analysis system using confidential data submitted by the parents and/or the student. The needs analysis establishes the financial need by deducting the computed family and/or the student contribution from the total cost of attending Clinton College. The Free Application for Federal Student Aid (FAFSA) is the needs analysis system used by Clinton College. It is used to determine eligibility for Federal Pell Grants, Federal Supplemental Educational Opportunity Grants, Federal Direct Student Loans and Federal Work Study.

In order for students to be eligible for Federal Student Aid, they must have either a high school diploma or a recognized equivalent (such as a General Educational Development certificate (GED) or have been home schooled.

Students receiving Federal Financial Assistance are required to meet the College's standards of academic progress. Additional, Federal requirements restrict the time frame that students receiving aid have to complete their program and require completion of a minimum number of credit hours each term. Failure to do so may result in termination of financial aid eligibility. Detailed information on the financial aid standards will be issued to all students receiving financial aid.

All awards of need-based financial aid are made annually, and students must reapply each year by completing a new or renewal FAFSA in order to be considered for assistance.
FINANCIAL AID PROGRAMS

Federal Pell Grant

The Federal Pell Grant is a federal program designed to provide financial assistance to undergraduate students who demonstrate a need for financial assistance to attend college. The U.S. Department of Education uses a standard formula, established by Congress, to evaluate the information reported on the Free Application for Federal student Aid (FAFSA). The formula produces an Expected Family Contribution (EFC) number. The Student Aid Report contains the EFC number, which determines eligibility.

Once a student receives a Pell Grant award for 12 semesters, or the equivalent, you will no longer be eligible for additional Pell Grants. Equivalency is calculated by adding together the percentage of Pell award that you received each year to determine whether the total amount exceeds 600%. Currently, 600% or 6 years is the Lifetime Eligibility for Pell Grant recipients.

The Federal Pell Grant award amount depends on the student's financial need, the student's cost of attendance, whether the student is full-time or part-time, and whether the student attends school for a full academic year or less. Students who attend fall and/or spring terms who receive a Pell Grant receive a check for any funds remaining after all their expenses have been paid. However, students are strongly encouraged to save these funds to pay for books and other incidental expenses.

Federal Work Study

The Federal Work Study (FWS) program utilizes federal funds to provide part-time employment for undergraduate students with financial need to help meet their educational expenses. Students who are enrolled at least half-time may work an average of 15 to 20 hours per week. FWS employment and job placement are determined by the student's eligibility, class schedule, job skills, available jobs, availability of funds, student's satisfactory academic progress, and conduct. Funds are limited and all eligible students may not be awarded a FWS position.

Students who are offered a FWS position in one semester may not be guaranteed a position the next semester. FWS positions are awarded each year on a first come, first serve basis to students who meet the eligibility requirements. Students will be interviewed. FWS time sheet is given to each student monthly in order to maintain an accurate record of hours worked. The time sheet must be signed and dated by the student and the supervisor of the Department or Facility where the student is employed. Time worked is recorded in increments of one-half hour or one hour. Time sheets must be submitted to the Financial Aid Office by the 19th of each month. Time worked after the 19th will be carried over to the next month.

Students who are selected for FWS must complete an I-9 and a W-4 form in order to be paid. These forms can be obtained from the Business and Finance Office. There are no term limitations on earnings, provided the Cost of Attendance on the student's award letter is not exceeded. Checks for time worked will be issued by the Business Office on the last workday of each month. The minimum hourly rate is $7.25.
Federal Supplemental Educational Opportunity Grant

A Federal Supplemental Educational Opportunity Grant (FSEOG) is awarded to undergraduates with exceptional financial need, i.e., students with the lowest Expected Family Contribution (EFC). Students with the lowest EFC are given priority to the grant funds. Funds for this program are limited also.

The FSEOG program is a campus-based program administered directly by the Financial Aid Office. The amount of aid awarded depends on the student's financial need, on the amount of other aid awarded, and on the availability of funds. The minimum award per eligible student is $100 for the academic year. This amount will be prorated on a semester basis.

Federal Direct Loans

The Federal Direct Loan Program is Clinton College’s major form of self-help aid for student's tuition, fees, and books. Students must go on-line to www.studentloans.gov to complete a Promissory Note and an Entrance Counseling in order to secure a loan. Any questions that the student may have after completion of the Entrance Counseling and Master Promissory Note should be directed to the Financial Aid Administrator. However, in unusual situations, if a student elects to fill out a paper MPN, they may do so. After completion of the MPN and the Entrance Counseling, the loan will be processed for disbursement.

MPNs for Direct Loans must be completed for each academic year. The loans may be subsidized or unsubsidized. A subsidized loan is awarded to students on the basis of financial need. The student will not be charged any interest before the beginning of the repayment period or during periods of deferment. The Federal Government "subsidizes" the interest during these periods.

Subsidized loans are loans for which the borrower is not responsible for the interest while the student is enrolled in college on at least a half-time basis. When the loan is in the six-month grace period, the period after the student is no longer enrolled at least half-time, the Federal Government will not grant interest subsidy for loans disbursed on or after July 1, 2012, and before July 1, 2014. The interest will be added to the principal and the student will be responsible for the interest that accrues during the grace period. The fixed interest rate of 3.4 percent for subsidized loans to undergraduate students during this period has been extended.

Unsubsidized loans are not awarded to students based on need. Students will be charged interest from the time the loan is disbursed until it is paid in full. The interest will be added to the principal at the rate of 6.8%.

Dependent freshman students, who qualify, are eligible to receive a maximum of $5500, of which, $3500 is subsidized and $2000 is unsubsidized. Independent Freshman students, who qualify, are eligible to receive a maximum, if warranted, up to $9500, of which $3500 is subsidized, and $5500 is unsubsidized. Students who are not eligible to receive other financial aid due to high income, may be eligible to receive an unsubsidized direct loan.
No repayment incentives will be offered by the Government on loans disbursed on or after July 1, 2012, except interest rate reductions to borrowers who agree to have payments automatically electronically debited from their bank account. **All loans must be repaid** in a timely manner by the student.

**Direct Plus Loans**

Parents who wish to apply for a Plus Loan to supplement a dependent student's educational expense, who is enrolled at least half time, must go on-line to www.studentloans.gov and complete a Direct Plus loan application and promissory note. Parents generally must pass a credit check. If the parent does not pass the credit check, a co-signer may agree to endorse the loan and promises to repay it if the parent does not repay it.

Generally, repayment of Direct Plus loans begins within 60 days after the loan is fully disbursed. There is no grace period for Plus loans. The interest rate is 6.8%. The interest begins to accumulate at the time the first disbursement is made. A schedule of payments will be made available to the parent by the lender or the parent may go to studentaid.gov on the web for more detailed information. Plus loans must be paid back to the lender in a **timely** manner.

**Managing Student Loans Debt**

Managing student loan debt can be difficult and confusing for many borrowers. Students should visit www.studentaid.gov, the Financial Awareness Counseling Tool. This site provides students with five interactive tutorials covering topics ranging from managing a budget to avoiding default. Students are able to access their individual loan history and receive personalized feedback that can help them better understand their financial obligations.
AWARDS

In order to provide adequate time for processing and awarding financial aid to students, priority dates are identified for each semester. If a student submits a financial aid application after the established priority dates, the student should be prepared to pay for tuition, fees, and books. Award notifications will be issued in approximately two weeks once a file is complete, if the student is not selected for verification. Verification is a process whereby information furnished by the student on the FAFSA is checked for accuracy and completeness. The award notification will list the type(s) and amount(s) of financial aid;

Priority Dates

- Fall Semester - July 15 each year
- Spring Semester - November 1 each year

Students must have their financial aid package completed before registration. Applicants who do not complete financial aid documents prior to registration must come prepared to meet all their expenses out of pocket. The Financial Aid Office reserves the right to adjust a financial aid package when an over-award occurs. The financial aid package includes, but is not limited to FAFSA on the Web, Entrance Counseling, and Promissory Note. These forms are available on the Web.

Students must notify the Financial Aid Office if any additional gift aid assistance is received for educational expenses. Furthermore, the Financial Aid Office reserves the right to void any awarded if it is determined that the student intentionally provided incorrect or false information on the FAFSA. All financial aid awards are subject to change if the information on which they were based changes. Federal Regulations require that awards be changed if they were given on incorrect or false information.

Clinton College's Financial Aid Office will adjust students awards throughout add/drop periods, or as deemed necessary. An award letter issued in the fall is based on full-time/halftime, three-quarter time, or less than half-time enrollment for an entire year. The award letter issued in the spring is based on full-time/halftime, three-quarter time, or less than half-time enrollment for the spring semester.

Full-time status consists of enrollment in a minimum of 12 credit hours. Three-quarter time status consists of enrollment in 9 to 11 credit hours. Half-time status consists of enrollment in 6 to 8 credit hours. Less than half-time status consists of enrollment in 1 to 5 credit hours. Students must report any change in enrollment status to the Financial Aid Office.
**Processing Applications**

Applications for Financial Aid are processed by the Department of Education Central Processing System. If the school code for Clinton College is included on the application, a refined copy of the application, along with other pertinent processing information is forwarded to the college electronically in an Institutional Student Information Report (ISIR). If the application is complete and does not require verification, it is then packaged for processing and disbursement of funds.

If further documentation is required, or the student is selected for verification, a request by letter, electronically, or in person is sent to the student for additional documentation. Students are given a time-frame to return the information.

No funds will be disbursed prior to meeting a 10-day seat time in each class. Students must attend each class at least once, during the first 10 days of class. Those students who do not meet the seat time will forfeit their financial aid eligibility for the semester.

Freshman students who are eligible to receive a loan will not be disbursed any loan proceeds until after completion of thirty (30) days in attendance.

Students must attend all classes that they are assigned the first ten days of class. Students who do not attend the required time, absent an acceptable excuse, will not be processed to receive financial aid disbursements.

An award letter containing the student's financial aid is prepared and must be signed by the student prior to disbursement of any funds. It is the students' responsibility to contact the financial aid office to sign the award notice prior to disbursement.

**NOTE:** Upon receipt of Federal Student Aid funds by the Business and Finance Office, (i.e., Pell, loans, FSEOG) the student's account will be credited prior to any refunds. Once the student's account is credited and there is a balance due the student, a credit balance is calculated and a refund (credit balance) is issued to the student within 14 days. No funds are disbursed from the Financial Aid Office. All disbursements are made by the Business and Finance Office.
Withdrawals

A withdrawal is when a student ceases to attend classes at the institution without obtaining an authorized Leave of Absence (LOA).

A student is required to provide notification to the institution of intent to withdraw by completing an official withdrawal form from the Office of the Registrar, the Dean of Academic Affairs, Residential Life or the Office of Financial Aid. The date that the student obtains a withdrawal form and notifies the official intent to withdraw triggers the official date of withdrawal.

In the event, the student does not complete an official withdrawal form, providing notification to an official of the institution acting in an official capacity triggers a withdrawal date. Intent to withdraw may be orally or in writing. If a student provides notification to the institution by mailing a letter, the date triggering the withdrawal is the date the letter is received. Further, an institution always has the option of using the date of a student's last participation in an academically related activity.

Students who would have provided official notification to the school, but for circumstances beyond their control were unable to, the school may use its discretion in determining the date of withdrawal.

If a student who began attendance and has not officially withdrawn fails to earn a passing grade in at least one course offered over an entire period, the institution must assume, for Title IV purposes, the student has unofficially withdrawn, unless documentation shows that the student completed the entire period by attending academically related classes.

Students who have received Federal Student Aid and withdraws from an institution prior to completion of the required period for coursework may be liable for a prorated return of funds received. A R2T4 is prepared to determine if the student or the institution are required to return funds. Failure to officially withdraw may seriously affect a student's eligibility for readmission or for transfer to another institution.

All students who terminate their attendance at this institution either by withdrawal, transfer, or graduation is required by Federal law to complete an exit counseling online or in person or a paper form prior to leaving the institution.
Return of Title IV Funds

Once a student who has received Federal Student Aid withdraws and a date of withdrawal is determined, the institution will calculate the percentage of the payment period or period of enrollment completed. A student who does not complete at least 60% of the payment period or enrollment period generally will be required to return a pro-rata share of the funds received. If the student has an unearned portion of funds to be returned, the Office of Financial Aid will notify the student within 30 days of the procedure to follow to repay the unearned funds. After completing 60% of the required payment period, the student is considered to have earned 100% of the Title IV funds. Institutionally scheduled breaks of five days or more are not included in the return of funds calculation.

If a student receives less Federal Student Aid than the amount earned, the institution must offer a disbursement of the earned aid that was not received, called a Post Withdrawal Disbursement. If the student received more than the amount earned, the institution and the student, or both must return the unearned funds to the Department within 45 days.

If funds are to be returned to the Title IV Program from which the student received funds during the established period, the funds must be returned to unsubsidized loans, (other than Plus loans), subsidized loans, Plus loans, Pell Grant, and the Federal Supplemental Educational Opportunity Grant, which are programs approved for this institution. Funds must be returned within 45 days.
Satisfactory Academic Progress

This policy is a requirement under the Higher Education of 1965, which governs all Title IV Programs utilized by this institution (Pell Grant, Federal Supplement Educational Opportunity Grant, Federal Direct Loans, subsidized and unsubsidized, Plus Loans, Federal Work Study and Teach Grant). This policy resulted from federal revision of regulations governing Satisfactory Academic Progress. (SAP)

This policy is designed to ensure that student’s use of the Title IV Program funds is responsible and it sets reasonable satisfactory academic standards that students must meet in a timely manner in order to continue receiving Federal Student Aid. Student’s academic progress will be monitored with respect to completion rate and Grade Point Average at the end of each semester.

Students who are not meeting the SAP standards will be notified and provided every available tool to succeed. In most cases, the student will be provided an academic plan for one semester with close monitoring to help the student succeed. If the student does not successfully complete the academic plan, then academic suspension becomes an option. The student may appeal this action.

Meeting the SAP standards is crucial to a student's progress in completing educational goals timely; and is an indicator that public funds are being used in a responsible manner.

Students' progress will be measured in terms of both qualitative and quantitative standards. The policy applies for attempted hours, re-entries, remedial courses, transfers, new students, and students who are readmitted with credits from other institutions. The entire academic history will be considered.

Transfer credits from another institution which are not applicable to this institution's academic program will not be included.

**Qualitative** - The minimum cumulative grade point average (GPA) the student must maintain for 30 or less attempted semester hours is 1.50. The minimum cumulative GPA the student must maintain for 31 or more attempted semester hours is a 2.0.

**Quantitative** - The maximum length of time student is eligible to receive financial aid is a maximum of 150% of the length of the normal program completion (i.e. for a four-year program), a student will have a maximum eligibility of six years, or twelve semesters.
Definitions

**Satisfactory Academic Progress (SAP)** - Maintaining the required cumulative GPA and completion of courses at a rate that meets the standards enumerated in this policy.

**Maximum Time-frame** - Specific time-frame set by the Higher Education Act to receive financial aid. HEA sets a 150% limit of the normal program's limit.

**Transfer Credits** – Courses accepted at this institution for credit from another institution. The Office of the Registrar evaluates transfer credits.

**Qualitative Measure** - Measurement of a student's progress consistent with graduation requirements for the program of study. Students in the Associate Arts Degree Program must attain a 2.0 cumulative GPA for graduation status.

**Quantitative Measure** - Time-frame the student has to complete their program of study and a minimum number of credit hours the student must complete at each stage of the process or at the end of each semester.

Attempted Credit - A course a student schedules and does not drop during the add/drop period, but remains on the students transcript.

Earned Credit - A course in which a passing grade has been receive. W (withdrawal), I (incomplete), A (audit) and F (Failure) are not considered as earned credits for SAP purposes.

Incomplete - A grade of "I" in an attempted course will not be counted as credit until the course is completed. Students will have 30 days upon return from summer vacation or Christmas vacation to remove the "I". If the "I" is not removed within the stated time, it will be counted as an attempted course.

**Financial Aid Probation** - A period in which the student has been identified as not meeting satisfactory progress but may continue to receive financial aid. The student is placed on an academic plan and will be expected to successfully complete the plan satisfactorily at the end of the grading period in order to continue receiving financial aid.

**Financial Aid Suspension** - Termination of financial aid after being given a chance to successfully meet Satisfactory Academic Progress Policy.

**Academic Suspension** -

**Appeal** - A student who is not meeting SAP policy may petitions the institution for a change in its position and requests reconsideration of the suspension to receive financial aid.
Default Management
This is a policy to promote student and school success by increasing retention and reducing
delinquency and default on the payment of student loans. Borrowers who default on student loans
face serious consequences, and it also adversely affects the institution.

In addition to the Entrance Counseling, students will be counseled at least once a month during
Lyceum or during Student Support Services class regarding the necessity of repaying their student
loans once they leave the institution. Presentations, oral counseling, and pamphlets will be distributed
to students on an ongoing basis. Students will be encouraged to borrow only the amount of money
that is needed to complete their education, as the amount borrowed impacts the amount that will be
due monthly when they enter repayment. From time to time they will be encouraged to revisit the
entrance counseling form that was completed prior to receiving the loan.

If it can be determined that a student is not making progress in scheduled classes, a proactive
conference will be set up with the student to solicit information that would aid in resolution of
the lack of academic progress, such as the need for a tutor, an academic plan, or intervention by
family members to avoid the possibility of the student leaving or dropping out of school.

If a student is identified as delinquent on loan payments, a letter will be sent to the student within 10
days of the institution receiving notification indicating options and who to contact. They will be
informed of the various options that are available to them in order to avoid delinquency and default.
Loans are considered in default after 270 days.

If a student is identified as delinquent on loan payments, a letter will be sent to the student within 10
days of the institution receiving notification indicating options and who to contact. They will be
informed of the various options that are available to them in order to avoid delinquency and default.
Loans are considered in default after 270 days.

If after sending the student a letter and the student continue to appear on the delinquency list, a
letter will be sent to the student as long as the name appears on the delinquency list every 30 days,
followed up by telephone calls. This increases the possibility of the student utilizing the options that
are available as a last resort.
DEFAULT PREVENTION/MANAGEMENT PLAN

**Purpose:** Develop a Default Prevention/Management Plan that will embrace Clinton College's heritage of promoting education and sustain a healthy student enrollment ensuring that the institution adheres to academic as well as financial aid policies and procedures.

**Goal:** Build a Default Prevention/Management Awareness Plan that will be continuously monitored and yield a default management rate of 15% or less.

Clinton College's default rates, over time, have fluctuated over the last 5 years, primarily due to the low-income population that we serve and the size of the cohort-two or three borrowers who default in a particular cohort can greatly impact the resultant cohort rate.

This Plan is designed to promote student and school success by increasing retention and reducing delinquency and default on payment of student loans.

**Objectives:**

The college will do the following:

1. **Ensure that in-depth entrance counseling will be provided to each student at the time of application for a student loan.**
2. **Provide Financial Literacy Workshops.**
3. **Provide exit counseling.**
4. **Distribute pamphlets and publications explaining loan repayments, schedule of monthly payments and a link to the website containing the same information.**
5. **Obtain as much demographic information as possible from family members, pastors, and former teachers, i.e. Cell phone numbers, change of addresses, and email addresses.**
6. **Alert letters will be mailed to delinquent students monthly.**
7. **Telephone contact will be made with students over 120 days delinquent.**
8. **Timely and accurate NSLDS reporting to be continued.**
9. **Frequent communication with the Academics Department to ascertain the names of those students who are not making satisfactory academic progress to take preventive measures to assist students and maintain retention.**
**Initial Enrollment/Application for Financial Aid**

All students who qualify for a loan receive an award letter from the Office of Financial Aid informing them of their total award which includes student loans. Students are counseled at the time of application for a student loan that they should only borrow what is needed for their education and that if the over-borrow, they can cancel at any time. The college's packaging philosophy focuses on grants and scholarships, however, being a small private school, the college is not eligible for state aid. Athletics scholarships are granted at the beginning of the semesters, but they are not substantial enough to cover tuition and fees. Students attending this college do not receive enough grant aid or scholarships to satisfy all tuition and fees, save the limited number of Department of Energy Grants. Consequently they must resort to student loans.

**Entrance Counseling**

In an effort to reduce student loan defaults, the college will ensure that each freshman student who applies for a student loan completes entrance counseling upon enrollment. Distribution of pamphlets and publications explaining the terms of loan repayments and a schedule of monthly payments is given to each student. Additional, financial aid workshops will be held monthly, in addition to the entrance and exit counseling. Students will continue to be made aware of the consequences of defaulting on a loan, i.e., reporting of delinquency and defaults to credit reporting agencies, which can adversely affect credit standing, difficulty in securing a mortgage or car loan, garnishment of wages and the withholding of income tax refunds. They are also informed of their inability to obtain future federal student aid in case of a default.

Efforts are made during entrance and exit counseling to obtain as much demographic information from students for immediate family members, friends, pastors, former teachers, and others who will know their whereabouts at all times. Cell phone numbers, email and changes of addresses will continue to be requested.

**Financial Literacy Workshops**

USA Funds Life Skills, an online curriculum provides postsecondary institutions with a resource to aid students in the development of basic life management skills, including timely graduation with a minimum amount of student loan debt. It places special emphasis on managing and repaying loans. Additionally, Financial Literacy Workshops will be held on a monthly basis during an open forum in Lyceum and each semester during Student Support Services classes.
Early Identification and Counseling for Students at-Risk

a. Implement Early Alert Program
b. Improve Academic Advising
c. Incorporate Life Skills in Freshman Seminar Class Provide tutoring/supplement instructions

Communication across Campus

Communication regarding the prevention and management of defaults will be campus-wide and not the sole responsibility of a single office. Clinton College will develop communication procedures for effectiveness and inclusiveness. Information regarding borrowers' academic progress and enrollment status will be shared with all offices across campus, including the office that disburses the funds.

This will assist the school in complying with regulations regarding standards and capabilities of accurate and timely reporting of borrowers' enrollment status, and satisfactory academic progress.

Default Prevention and Retention Staff

Members of the default prevention and management team will establish working relationship with borrowers early in the students' experience through repayment. This includes staff dedicated to retention activities, a key to school and student success, as well as, default reduction.

Late Stages of Enrollment

Extensive exit counseling reiterating the same information that was provided upon entrance will be held with all students, including students who withdraw, transfer, or graduate. Students who withdraw will receive academic grades rather than a W in their classes, which will eliminate them from the cohort. In-depth counseling that focuses on explaining repayment plans, repayment options, deferment, forbearance, and economic hardship options. This will give the student and the college an opportunity to clarify and clear up any misconceptions.

Withdrawals

Many borrowers who default on their loans are borrowers who withdraw from school prior to completing their academic program. These borrowers are at the highest risk of default. They can often be identified while still on campus. Early identification and timely intervention can improve student retention and reduce the default rate.
In addition to fulfilling the regulatory requirements to provide exit counseling to students, our school will attempt to encourage students who withdraw to attend some other institution to complete their programs of study.

**Timely and Accurate Enrollment Reporting**

There is a direct correlation between late or inaccurate enrollment reporting and default loans. This institution will make timely and accurate reporting to the Secretary, the lender or the guarantor as appropriate and required by regulations. This will promote school and student success.

**Tracking**

The college will maintain a borrower data base from monthly reports obtained from agencies and lenders in order to efficiently track and assist borrowers who are delinquent in an effort to aid in the resolution of their delinquent status.

If after 90 days, a student is deemed to be delinquent on a student loan payment, a letter will be sent to the most recent address of the student as a reminder that the status of the loan is overdue; and that the student should contact the college to make arrangements to bring the loan payment current. Subsequent reminder letters will be sent to the student on a monthly basis and in extreme cases where the student is non-responsive, attempts will be made to contact the student by telephone, reminding the student of available options and the college's interest in helping to resolve the delinquency in order to avoid default.

In those instances where correspondence is returned as undeliverable, subsequent correspondence will be sent to the students at the address of references given.
**Drug Awareness**

The Drug Awareness Program is published in the Student Handbook and the employee handbook. The Drug Awareness Program is a responsibility of the Vice President for Student Affairs. Information on Drug Awareness is also communicated to students, faculty, and staff during Lyceum at least once per semester.

The sale, use, possession, and/or distribution of controlled substances are prohibited on this campus. Students who are observed or suspected of the sale, use, possession, and/or distribution of illegal drugs are immediately suspended indefinitely from the institution.

Residence halls are subject to drug sweeps by the Rock Hill Police Department's Narcotics Unit when requested by the Vice President for Student Affairs.

**Security Program**

In order to ensure, protect, and preserve confidentiality of student financial aid records, all financial aid files are maintained in the Office of the Financial Aid Administrator in locked files. The Financial Aid Administrator is the only individual authorized to release information from financial aid files. The Financial Aid Administrator releases information only when it is necessary for the efficient operation of other government programs, administrators' requests, law enforcement or family inquiries that are permissible under FERPA.

**Registrar/Business and Finance**

The Registrar electronically submits a list of all students on the rolls within thirty days after the date of registration. This list includes the student's name, status, and grade level. This list is used when determining a student's eligibility, as to whether they are full-time, part-time, half-time, or less. Additionally, the Registrar keeps the Financial Aid Office abreast of all changes in enrollment, satisfactory academic progress, and administrative withdrawals. There is software in use that provides for constant access to information necessary to the financial aid process.

There is software in use that allows a constant access to limited Business and Finance information. However, communication with the Business Office is ongoing. All monies are drawn down from the Department of Education by the Business Office. The Business and Finance Office is responsible for all disbursement of funds. The Financial Aid does not disburse any funds or handle any cash transactions.

All Federal Aid refunds to students are calculated and disbursed by the Business and Finance Office. The Financial Aid Office and the Business Office reconcile accounts on a monthly basis. There is a process by which reports are requested from the Department of Education's Common Origination Division, and reports from Financial Aid are reviewed with the Business Office to assure accuracy and completion of the reconciliation.
Campus Crime Information

Statistics on campus crime is compiled and maintained by the Registrar. An annual report is submitted to the U.S. Department of Education based on information obtained thru visual observation or the Rock Hill Police Department.

Information on viewing a hard copy of this information should be directed to the Vice President for Student Affairs.

Family Education and Privacy Act

Clinton College's Policy regarding access to student records by persons other than the student is governed by the Family Educational Rights and Privacy Act (FERPA). Under this law, students have the right to inspect and challenge the accuracy of information contained in their college educational record.

Students are advised of the FERPA upon registration and are given a permission form to sign in order to allow access to their records by parents, guardians, or others who would be likely to request information regarding the student. The form is retained in the student's records. In the absence of a signed release, if the student is a dependent student and it is clear that the parent claims the student as a dependent, parents are given information and the student is notified. FERPA does allow the college to release certain information such as directory information, date and place of birth, classification, college, and major, dates of attendance, degrees, awards, as well as participation in school activities, weight and height for special activities. Questions regarding FERPA must be presented to the Registrar or the Vice President of Academic Affairs.

Drug Awareness

The Drug Awareness Program is published in the Student Handbook and the employee handbook. The Drug Awareness Program is a responsibility of the Vice President for Student Affairs. Information on the Drug Awareness is also communicated to students, faculty and staff during Lyceum at least once per semester.

The sale, use possession, and/or distribution of controlled substances are prohibited on this campus. Students who are observed or suspected of the sale, use possession, and/or distribution of illegal drugs are immediately suspended indefinitely from the institution.

Residence halls are subjected to drug sweeps by the Rock Hill Police Department’s Narcotics Unit when requested by the Vice President for Student Affairs.