SONORAN UNIVERSITY
OF HEALTH SCIENCES

Financial Aid Office

Policies & Procedures

SONORAN UNIVERSITY
OF HEALTH SCIENCES

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Section 1 - Mission Statement/Department Overview

1.10 Mission Statement

The Financial Aid Office supports the mission of the University by providing prospective and enrolled students with information and resources to financially support their educational goals. The office strives to facilitate the financial aid process by educating students and prospective students about the availability of financial aid, as well as by providing solutions and alternatives in educational financing.

History: 11/25/2002
Effective: Revised 03/10/2004

1.20 Introduction

The purpose of this document is to record policies and procedures surrounding the delivery of financial aid at Sonoran University of Health Sciences. If no policy or procedure addresses a given issue, the financial aid staff is expected to use professional judgment based upon the intent of all financial aid programs and financial aid office practices until a policy can be developed.

This manual:

1. Provides the financial aid staff with current policies, which pertain to eligibility assessment for federal, private, and University programs.

2. Provides each staff member with general and specific responsibilities and the Financial Aid office's relationship with other departments/divisions of the University.

3. Provides each staff member with general office policies so that a systematic and consistent approach may be taken in the operation of all programs, ensuring that similar operations will be handled in a uniform manner.

4. Provides quick reference to various practices.

5. Facilitates the orientation and training of personnel when changes occur.

1.30 Financial Aid Reference Documents

There are many resource guides available to assist the financial aid staff. These citations are maintained by the U.S. Department of Education and are available to staff members.

The documents used to determine a student's eligibility for financial aid are included, but are not limited to the following:

- Current regulations published in the Federal Register
- Department of Education guides (e.g., Federal Student Financial Aid Handbook and Audit Guide)
- Dear Colleague Letters
- Financial aid legislation and other laws or regulations that impact Title IV aid
- National Association of Student Financial Aid Administrators (NASFAA) newsletters

1.40 Responsibility for Institutional Policy Development

Policy
The financial aid office is responsible for developing institutional policy related to the delivery of financial assistance.

History: 1996

Effective: 1996

Purpose
Policy development is required to ensure the institution complies with federal regulations governing the administration and delivery of funds for the Federal Student Financial Aid programs.

Responsibility
Financial Aid Director, Vice President of Student Affairs, and other individuals as directed by the VP of Student Affairs

Impact/Scope
Students, Prospective Students, Business Office, Registrar, and Admissions

Communication
Once the policy has been changed, an official announcement will be made to all faculty, students, and prospective/incoming students, the Business Office, Registrar, and Admissions, as well as other office staff as required.

Procedure
The Financial Aid Office will meet with the VP of Student Affairs to develop policies on an as-needed basis. The primary focus for policy changes relates to changes in Federal Title IV regulations.

Depending on the complexity of the issues surrounding the policy, a committee may be created to evaluate the policy changes and to consider the impact on other institutional offices and prospective students.

Forms

- Policy Specific

1.50 Operating Policies

Policy
The financial aid office will adhere to operating policies designed to ensure that the office is effective in carrying out its responsibilities.

History: 1996

Effective: 1996

Purpose
To administer and coordinate financial assistance offered to students at the college without bias.

Responsibility
Financial Aid Office

Impact/Scope
Students, Prospective Students, Business Office, Registrar, and Admissions

Communication
Once the policy has been changed, an official announcement will be made to all faculty, students, and prospective/incoming students, the Business Office, Registrar, and Admissions, as well as other office staff as required.

Procedure
The following operating policies are designed to ensure that the financial aid office is effective in carrying out its responsibilities:

All students must apply for financial assistance by completing the appropriate electronic forms through the Federal Student Aid website.

All funds available to the University for financial assistance shall be administered through the financial aid office. If the business office should receive monetary funds for a student from outside sources (e.g., third-party entities paying on behalf of the student), the business office is required to notify the financial aid office.

The financial aid office shall maintain adequate records to ensure proper administration of aid funds. This includes ensuring that aid given is not in excess of the need or the cost of attendance and that aggregate awards do not exceed total expenditures of funds under each program.

Selection of students to receive financial aid will be made without regard to age, sex, race, color, religion, sexual orientation, national origin, disability, or marital status.

All students applying for aid are required to apply annually for federal assistance.

1.60 Student Records, Financial Data, and Other Confidential Documents

Policy
The Financial Aid Office and all Sonoran staff adhere to and uphold policies as they relate to confidentiality and security as published in the Sonoran Employee Handbook, the Enrollment Services Information Security and Confidentiality Plan, and by the Information Technology Department.

History: 1996

Effective: 1996, 2007

Purpose
To protect confidential information and data from unauthorized access, change, and destruction.

Responsibility
Financial Aid Office

Impact/Scope
Students, Prospective Students, Business Office, Registrar, and Admissions

Communication
Once the policy has been changed, an official announcement will be made to all faculty, students, and prospective/incoming students, the Business Office, Registrar, and Admissions, as well as other office staff as required.

Procedure
The following operating policies are designed to ensure that the financial aid office is effective in carrying out its responsibilities:

1. All Financial Aid staff members, including work-study students, must read, sign, and agree to comply with the Enrollment Services Information Security and Confidentiality Plan.
2. All Financial Aid staff members, upon hire, are reported to the appropriate bodies or federal organizations and assigned a unique personal username and password for all financial aid systems, software connections, and federal sites as a precautionary measure to protect sensitive data.
3. All Financial Aid staff members, upon employment termination, are reported to the appropriate bodies or federal organizations within 48 hours, and their unique personal usernames and passwords are terminated.
4. All Financial Aid staff members are responsible for safeguarding against unauthorized access, alteration, destruction, and copying of sensitive federal aid information obtained from said systems.
5. Destruction of confidential financial aid records must be approved by the Financial Aid Director or the VP of Student Affairs. Once approved, records must be properly shredded and discarded.

Section 2 - Participation in Federal Financial Aid Programs

2.10 Institutional and Program Eligibility

Policy
The University will maintain Institutional and Program eligibility to participate in Title IV Federal Student Financial Aid Programs. The Program Participation Agreement (PPA) between Sonoran and the Department of Education entitles the financial aid office to participate in the following federal programs:

- William D. Ford Direct Loan Program, including:
  - Direct Unsubsidized Loan
  - Direct PLUS Loan
- Campus-Based Programs
  - Federal Work Study

History
The University was initially authorized on February 10, 1995, by the United States Secretary of Education to participate in Federal Student Financial Aid Programs authorized by the Higher Education Act of 1965, as amended.

Effective
Current participation is approved through March 31, 2027.

Purpose
To provide students with access to the Federal Student Financial Aid Programs.

Responsibility
Vice President of Student Affairs and Financial Aid Office.

Impact/Scope
Students, Prospective Students, Business Office, Registrar, Enrollment, and Admissions

Communication
Once the policy has been changed, an official announcement will be made to all faculty, students, prospective/incoming students, enrollment, business office, registrar, admissions, and other office staff as required.

Procedure
Prior to the expiration of the current PPA and ECAR, the University must apply to be re-certified and approved by the US Department of Education. The deadline for the upcoming recertification is March 31, 2027.

Forms

- Program Participation Agreement (PPA)
- Eligibility and Certification Approval Report (ECAR)

Section 3 – Campus-Based Aid: Federal Work Study

3.10 Institutional and Program Eligibility

Policy
The University will maintain eligibility to participate in the Federal Work Study (FWS) Program by completing the Fiscal Operations Report and Application to Participate (FISAP) annually.

History: 1995

Effective: Revised 2012

Purpose
The FISAP will be completed annually to request federal funds to provide eligible students with on-campus work opportunities through the FWS program.

Responsibility
Vice President of Student Affairs, Financial Aid Director, Business Office.

Communication
An email notification from the Financial Aid Director will be provided to the VP of Student Affairs and the Business Office regarding the FISAP deadline. The Financial Aid Director will notify the Business Office when the FISAP has been submitted to the Department of Education.

Procedure
The Department of Education requires that schools complete the FISAP by October 1st each year to request campus-based funding, such as FWS. Completion of the FISAP will be done by the Financial Aid Director and the Controller. A final review of all FISAP components will be reviewed by the CFO and President/CEO. Once the FISAP is reviewed and approved by all parties, the Financial Aid Director will submit the FISAP through the Campus-Based System. The President/CEO will electronically sign the FISAP and follow additional submission requirements.

The Financial Aid Director will submit by April 1st of each year a waiver request for the FWS Community Service Waiver Expenditure through the Campus-Based System. If the Department of Education denies the University's waiver request, the college will be required to spend seven percent of its yearly FWS allocation towards Community Service and Family Literacy programs.

Forms

- FISAP and FWS Community Service Waiver Expenditure Request: https://cod.ed.gov/ecb/index.action
- FISAP signature page for President/CEO

3.20 Administrative Implementation

Policy
The Financial Aid Office will administratively oversee the Federal Work Study (FWS) Program to provide federal funds for on-campus student employment.

History: 1995

Effective: Revised 2012

Purpose
The FWS program allows eligible students to work on campus with staff and faculty. FWS funds are paid directly to students as they complete their hours of employment and may assist in reducing the students' overall student loan debt.

Responsibility
Financial Aid Office, Business Office, Human Resources, CFO, VP of Student Affairs

Communication
Once the policy has been changed, an official announcement will be made to all faculty, students, and prospective students, Student Affairs, Business Office, Human Resources, as well as other office staff as required.

Procedure
The Financial Aid Office will submit the FISAP annually to the Department of Education. If federal funding is approved, the Business Office and Financial Aid Office will review and complete the following:

1. A FWS budget will be created each year to ensure allocations of 75% from the Department of Education and 25% from Sonoran are earned by June 30th
2. Monetary usage of FWS funds from prior quarters/years will be analyzed to determine a budget for departments participating in the FWS program
3. The University's staff and faculty are required to communicate with the Financial Aid Director if interested in participating in the FWS program or if changes are needed to their departmental FWS budget.
4. Reconciliation of FWS funds will occur bi-weekly and quarterly by reviewing payroll information
5. The drawdown of FWS funds will be completed by the Business Office in the G5 system

If the Department of Education denies federal funding for the FWS program, the Financial Aid Director will provide email communication to staff, faculty, and students.

Forms

- FWS reconciliation spreadsheet
- Payroll reports

3.30 Hiring Process

Policy
The Financial Aid Office will provide students, staff, and faculty with step-by-step instructions for purposes of hiring or being employed in the Federal Work Study (FWS) program.

History: 1996

Effective: Revised 2012, 2015

Purpose
To ensure all FWS participants understand regulations and processes from the Human Resources and Financial Aid Offices.

Responsibility
Financial Aid Office and Human Resources

Communication
Once the policy has been changed, an official announcement will be made to all faculty, students, and prospective students, Student Affairs, Business Office, Human Resources, as well as other office staff as required.

Procedure
The FWS hiring process is provided below:

1. The Financial Aid Director will email staff and faculty each quarter during week six to review their FWS budget and provide their departmental needs regarding FWS positions.

2. The Financial Aid Director will provide a FWS job fair each quarter after final registration is performed by the Registrar's Office, in order to allow all students to seek employment opportunities. Job descriptions will be available at the job fair for students to review qualifications and job responsibilities.

3. The Financial Aid Director will review a student's eligibility at the job fair. Students will be required to meet the following to participate in the FWS program:

    a. Submission of the Free Application for Federal Student Aid (FAFSA)
    b. Students must demonstrate need; a review of their Student Aid Index (SAI) will be performed
    c. Students must meet Satisfactory Academic Progress
    d. Students must meet GPA requirements

4. Interested and eligible students will email hiring managers to schedule an in-person interview. The hiring manager will determine the final candidate/s for their FWS positions.

5. Managers will be required to email the Financial Aid Director during week nine of the quarter, providing their FWS students' names, pay rate, and total hours scheduled to work during the quarter.

6. The Financial Aid Director will provide a final FWS list to the Human Recourses department for review during week 10 of the quarter.

7. The Human Resources department will contact new student employees to complete their Sonoran employee requirements, as well as contact the hiring managers to finalize payroll and IT notices.

8. The Financial Aid Director will email each FWS student participating in the FWS program, a week prior to the start of the quarter confirming their FWS position/s, hours, pay rate and departmental codes for payroll purposes.

9. FWS students will be required to submit their working hours at the end of each workday. Managers will be required to review and approve their students' hours bi-weekly.

10. Payroll information will be provided bi-weekly to the Financial Aid Director, Senior Accountant, and Controller to reconcile data. Reconciliation of payroll will occur every 30 days, and the Senior Accountant will draw 75% of the FWS earnings from G5. The approved FWS budget must be earned by June 30th every year.

11. If a student/s discontinues their participation in the FWS program, due to enrollment status or personal decision, the Financial Aid Director will email HR and the hiring manager with an updated communication. If a student graduates or withdraws from the program, the HR team will terminate the student in ADP within 30 days.

Forms

- FWS job descriptions
- Sonoran New Hire Employee Documentation
- Payroll and termination notices
- FWS reconciliation spreadsheet
- Payroll reports

Section 4 - Participation in Non-Federal Aid Programs

4.10 International Funding

Policy
The Financial Aid Office will provide international students with information and resources regarding state or federal funding to assist with educational costs.

History: 1992

Effective: 1992

Purpose
To assist and support international students in seeking financial opportunities to finance their graduate education.

Responsibility
The Financial Aid Director

Impact/Scope
Admissions, Dean of Students, and international students

Communication
Once the policy has been changed, an official announcement will be made to all students and prospective/incoming students, Student Affairs, Business Office, Registrar, and Admissions, as well as other office staff as required.

Procedure
During Sonoran's Interview Day event, information will be provided to international students regarding the University's cost of attendance and help students identify if they have access to federal and private funding from their country of origin. Upon a student's acceptance to Sonoran University, students will work with the Financial Aid Director to complete the necessary steps to apply for loans and/or scholarships.

Sonoran University is an approved institution in Canada, allowing students to apply for federal and private loans. The Financial Aid Director will request documentation from each student's province to certify enrollment and tuition information for a specific award year. Students will be required to submit to the Financial Aid Office documentation that requires annual recertification.

Forms

- Documentation from the country of origin to confirm enrollment and costs.
- Documentation from scholarship sources.
- Certification of enrollment through the National Student Loans Service Centre (NSLSC) for Canadian students.

4.20 Scholarships

Policy
The Financial Aid Office and the Development Office will seek scholarship opportunities on an annual basis for all enrolled students at Sonoran University.

History: 1994

Effective: Revised 2007, 2010

Purpose
The College has continuously made an effort to increase scholarship funding since 1994. In 2010, the College incorporated into its strategic plan to increase scholarship funds by 20 percent each year.

Responsibility
Financial Aid Office, Student Success and Persistence Committee, Development Office, Admissions

Impact/Scope
Financial Aid Office, Business Office, Admissions, Development Office, new and continuing students

Communication
Once the policy has been changed, an official announcement will be made to all students, Student Affairs, Business Office, Admissions, as well as other office staff as required.

Procedure
The Financial Aid Office will calculate scholarship awards as part of the student's cost of attendance. If the scholarship award is provided to the college after the start of a quarter and no prior knowledge or information was given to the Financial Aid Director, professional judgment will be used to determine if the scholarship award can be disbursed to the student without creating an over-award to the financial aid package.

Sonoran New Student Scholarships

Sonoran's Student Success and Persistence Committee (SSPC), in collaboration with the Director of Enrollment and the Financial Aid Director, will review and determine the scholarship budget for a specific award year. Scholarships will be offered to new incoming students every fall and spring quarters. The number of scholarship recipients and awards may vary each year.

Scholarships will be granted based on financial need, essay component, or academic excellence. Academic excellence can be determined by cumulative grade point average for all post-secondary coursework, prerequisite GPA, and/or undergraduate major. Scholarship applications may be required for incoming students; however, early submission of the Admissions application is highly encouraged.

Procedures

1. The SSPC will collaborate with the Director of Enrollment to assess enrollment projections for each new cohort.
2. The Director of Enrollment will collaborate with the Financial Aid Director to determine scholarship opportunities based on budget approval.
3. Scholarship communications will be provided through email and social media platforms.
4. Essay-based scholarships will be reviewed by the SSPC, and awardees will be selected using a grading scale.
5. The Financial Aid Director will gather a list of all scholarship finalists from the Director of Enrollment and the SSPC. Scholarship award letters will be created and provided to the President/CEO for signature. Scholarship award letters will be delivered electronically to each scholarship recipient.
6. Students may view the scholarship award on their financial aid award letter, student account statement, and their online student financial aid portal.
7. External scholarship awards will be provided to the Business Office and applied to the student account.

Sonoran General and Endowed Scholarships

The Financial Aid Director will collaborate with the Development Office five months before the start of the fall term. A review of the scholarship budget and timeline will be conducted. Students may be required to submit applications, essays, and meet specific academic criteria to be considered for a scholarship award. The University will make every effort to ensure that requests made by the Donor regarding the process and disbursement of scholarships are met without jeopardizing institutional and federal policies.

Procedures

1. The Financial Aid Director will provide email communication to Sonora's student population of scholarship opportunities, three months before the start of the fall term.
2. Sonoran students will receive a scholarship application providing guidelines and instructions for the awards available.
3. The Financial Aid Director will provide specific submission deadlines to ensure proper awarding and disbursements are completed before the start of the term.
4. Scholarship applications that require essays and/or letters of recommendation, members of SSPC will be selected to review and grade scholarship applications.
5. The Financial Aid Director will compile graded scholarships and select recipients who received the highest scores. Scholarship recipients will be notified via email of their awards, and scholarships will be included in the student's financial aid offer letter.

Forms

- Scholarship applications

Section 5 – Student Application for Federal Student Aid

5.10 Prospective Students

Policy
The Financial Aid Office will collaborate with the Admissions Office to provide financial aid information to prospective students regarding scholarships, the cost of attendance, types of aid and repayment plans.

History: 1992

Effective: Revised 1992, 2010

Purpose
To educate prospective students on federal financial aid and financial literacy.

Responsibility
Financial Aid Office and Admissions Office

Impact/Scope
Financial Aid Office, Admissions Office, and prospective students

Communication
Once the policy has been changed, an official announcement will be made to prospective students, Student Affairs and other office staff as required.

Procedure
The Admissions Office will identify prospective students in a variety of ways, which include but are not limited to the following:

- Recruitment methods
- Telephone
- Email

Financial aid information will be provided to prospective students by email, in person, or by correspondence. The Financial Aid Director is responsible for maintaining financial aid and tuition and fees information on the University's website, MySonoran, and NetPartner.

During the Admissions interview process, the Financial Aid Director will provide an entrance counseling presentation as required by the U.S. Department of Education on federal student aid. Entrance counseling presentations will be conducted in person and virtually.

Forms

- Financial aid information packet

5.20 Admitted Students

Policy
Prospective students, once they have been accepted to Sonoran University, the Financial Aid team will ensure students have the resources and tools to complete the necessary documents to apply for federal student aid.

History: 1992

Effective: 1992

Purpose
To provide students who have been accepted to the program with online resources to complete the federal student aid information.

Responsibility
Financial Aid Office

Impact/Scope
New Students and Financial Aid Office

Communication
Once the policy has been changed, an official announcement will be made to prospective students, Student Affairs, Business Office, Registrar and Admissions, as well as other office staff as required.

Procedure
A Salesforce report will be available to the Financial Aid team, identifying students who have been admitted to Sonoran University. Email notices will be delivered to admitted students every two weeks with reminders of their tasks to apply for federal student aid.

If students are interested in receiving federal student aid, students are required to complete the Free Application for Federal Student Aid (FAFSA) to determine a student's Title IV eligibility. If students are interested in receiving federal loans, they will be instructed to complete the Master Promissory Note and Entrance Counseling.

The Financial Aid Advisor will begin packaging aid three months before the start of the new term. Financial aid offer letters will be emailed to students and posted on the student financial aid portal through MySonoran. Students will be required to accept or decline their aid before the start of the term. Financial aid will be posted on student accounts on the first day of every quarter.

Forms

- Federal student aid online documents

5.30 Continuing Students

Policy
The Financial Aid team will communicate with continuing students on a quarterly and annual basis regarding federal student aid.

History: 1992

Effective: Revised 1992, 2010

Purpose
To assist students with updates regarding their federal student loans and the reapplication of federal student aid.

Responsibility
Financial Aid Office

Impact/Scope
Continuing students and Financial Aid Office

Communication
Once policy has been changed, an official announcement will be made to students, Student Affairs, Business Office, Registrar and Admissions, as well as other office staff as required.

Procedure
The Financial Aid staff will review each financial aid file every quarter to verify a student's Title IV eligibility. Email communications will be provided to students with FAFSA reminders and deadlines.

The Financial Aid staff will review the National Student Loan Data System (NSLDS) every quarter to determine a student's Direct Unsubsidized annual and aggregate loan limits. Private loan information will be provided in the students' offer letter. The Financial Aid staff will recommend that students schedule quarterly meetings to review their financial aid projections and personal budgets.

Forms

- Email communications

5.40 Application Process: FAFSA

Policy
Each student requesting federal financial aid must complete the Free Application for Federal Student Aid (FAFSA) for the appropriate award year. Students are requested to complete their FAFSA electronically at https://studentaid.gov/h/apply-for-aid/fafsa.

History: 1995

Effective: 2003

Purpose
To reapply for Title IV aid.

Responsibility
Students and Financial Aid Office

Impact/Scope
Students and Financial Aid Office

Communication
Once policy has been changed, an official announcement will be made to students, Student Affairs, Business Office, Registrar and Admissions, as well as other office staff as required.

Procedure
All incoming and enrolled students applying for financial aid at Sonoran University must fill out the Free Application for Federal Student Aid (FAFSA) and submit it to the Department of Education's (ED) Central Processing System. The application is available on October 1st for the following award year (July 1 – June 30) processing. Students can electronically submit their FAFSA at https://studentaid.gov/h/apply-for-aid/fafsa.

Within one to two weeks of submission of the completed FAFSA, ED's Central Processing System will provide the student with a Student Aid Report (SAR) and the institution/s listed with an Institution Student Information Record (ISIR). The Financial Aid team is responsible for verifying citizenship, Student Aid Index, verification requests, loan history, and any C flags.

Upon review of the student's ISIR, if additional documentation is required by the student, the Financial Aid staff will email and call the student to gather the necessary information to determine eligibility.

Forms

- FAFSA on the web

5.50 Financial Application Changes Process

Policy
University staff may not complete and/or correct any application, document form, or supporting statements required from the financial aid applicant during the financial aid process. All corrections (see Section 7.10 Verification Policies for exceptions) must be made by the student and must contain the student's initials and/or signature.

History: 1995

Effective: 1995

Purpose
The U.S. Department of Education requires institutions offering federal aid to have internal controls to remain compliant with Title IV federal regulations. Changes to financial aid application forms are to be completed by the student.

Responsibility
Financial Aid Office

Impact/Scope
Students, Prospective Students, Student Affairs, and Admissions Offices

Communication
This policy is specific to the Financial Aid Office. Changes will be documented internally, and the VP of Student Affairs will be notified.

Procedure
The University will require changes to any financial aid application forms to be completed by the student. These changes will be signed by the students, making the changes proof of compliance with this policy.

The only exception to this policy is for ISIR corrections that may be required when completing the verification process. If ISIR corrections are needed, the Financial Aid team will follow verification procedures as required by the U.S. Department of Education.

Forms

- Free Application for Federal Student Aid (FAFSA)
- Institutional Student Information Record (ISIR)
- Verification Documentation

5.60 Satisfactory Academic Progress

Policy
Students must make Satisfactory Academic Progress (SAP) as determined by the University and federal regulations. Sonoran's SAP policy states that students must take and complete a cumulative number of required credits by the end of every calendar year and must maintain a minimum GPA for each career program. Failure to maintain either of these requirements will result in the students being placed on academic warning and/or being academically dismissed.

History: *1995*

Effective: March 2006, 2023

Purpose
To ensure satisfactory academic progress is being monitored for all students, and take appropriate actions if students are not making satisfactory academic progress.

Responsibility
Academic Advising, Academic Policy and Progress Committee, Dean of Students, Registrar's Office, and Financial Aid Office

Communication
Students will be notified by the Academic Advising if they are at risk of not meeting Satisfactory Academic Progress.

Procedure
Sonoran is committed to excellence in educational quality and learning outcomes by providing a supportive academic environment to students. Federal regulations require Sonoran to develop and apply a consistent policy of academic progress, which includes a quantitative measure (credit hours completed) as well as a qualitative measure (grade point average). To make satisfactory academic progress, Sonoran students must take and successfully complete a cumulative number of required credits by the end of every calendar year and maintain a minimum career GPA.

Students in the ND program must maintain a cumulative GPA at or above 2.1; students in the MS programs must maintain a cumulative GPA at or above 3.0. Failure to maintain either of these requirements will result in a student being placed on academic warning and/or being academically dismissed.

At Risk for Unsatisfactory Academic Progress
Sonoran students have the responsibility to recognize when they are experiencing academic difficulties and to initiate requests for assistance. Students are encouraged to seek assistance from their faculty members, Academic Advisors, and the Student Success and Retention Manager.

When a student's course attendance, demonstrated competence, and/or rate of academic progress indicate they are not succeeding in a course, the faculty member may discuss the situation with the student and report the student's concerns to the Dean of Students and/or Academic Advisors. The Dean of Students and/or Academic Advisors will then connect the

student with the appropriate resources to support their success. These may include, but are not limited to, support from peer mentors, advisors, tutoring services, and counseling.

Academic Warning
Academic Warning is a reflection of a student's academic standing. An Academic Warning is assigned as an alert when the student is not making sufficient progress toward completion of the degree and a signal that intervention, in the form of an academic development plan, is required.

Unsatisfactory Academic Progress

Academic Warning I
A student is placed on Academic Warning I if:

- The student does not achieve the required program minimum cumulative GPA standard (2.1 ND/3.0 MS), or
- The student fails one or more clerkships (CLTR course) during a quarter at Sonoran University (ND program only).

A notation of Academic Warning I is included on the academic transcript. Students placed on Academic Warning I will receive notification from the Registrar's Office and must meet with Academic Advising to complete an academic development plan intended to support improved performance. Students are encouraged to engage with all available support resources (e.g., Learning Specialist and mental health professionals) to obtain additional assistance. Students placed on Academic Warning I will continue in this status unless they meet the requirements for restoring good academic standing.

If the student is unable to continue in their prescribed program of study, the student may be placed on an **Administrative Leave of Absence (ALOA)** and therefore may not be eligible for financial aid. The student may be eligible to reenter their prescribed program of study as determined by academic advising and Sonoran University's ALOA policy as outlined in the catalog. Note: A student whose GPA projections show an inability to recover to 2.1 (ND)/3.0 (MS) or higher in subsequent terms by the projected graduation date may be subject to dismissal.

Academic Warning II
A student is placed on Academic Warning II if:

- The student does not achieve the required program minimum cumulative GPA standard (2.1 ND/3.0 MS) while on Academic Warning I, or
- The student fails one or more clerkships (CLTR course) during a quarter at Sonoran University (ND program only) while on Academic Warning I.

A notation of Academic Warning II is included on the academic transcript. Students placed on Academic Warning II will receive notification from the Registrar's Office and are required to meet with academic advising to update their academic development plan, intended to support improved performance. Students are encouraged to engage with all available support resources (e.g., Learning Specialist and mental health professionals) to obtain additional

assistance. Students placed on Academic Warning II will continue in this status unless they meet the requirements for restoring good academic standing.

If the student is unable to continue in their prescribed program of study, the student may be placed on an **Administrative Leave of Absence (ALOA)** and, therefore, may not be eligible for financial aid. The student may be eligible to reenter their prescribed program of study as determined by academic advising and Sonoran University's ALOA policy as outlined in the catalog. Note: A student whose GPA projections show an inability to recover to 2.1 (ND)/3.0 (MS) or higher in subsequent terms by the projected graduation date may be subject to dismissal.

Academic Support for Students on Academic Warning
To support students on academic warning, students are required to meet with Academic Advising to help navigate resources and support opportunities. Students on the first or second levels of academic warning will be required to complete an academic development plan during their meeting with Academic Advising. If the student is unable to continue in their prescribed program of study, the student may be placed on Administrative Leave of Absence (ALOA) and may not be eligible for financial aid. The student may be eligible to reenter their prescribed program of study as determined by Sonoran University's ALOA policy and the Academic Advising Office.

The Academic Warning notation remains on the student's transcript indefinitely. Students reduce a warning level when their cumulative GPA meets or exceeds the minimum required as outlined for their program of study for two consecutive quarters per warning level.

Academic Restoration
To clear an Academic Warning and restore good academic standing, a student on Academic Warning must meet the following requirements for *each* level of academic warning to be reduced by one level.

- Earn a minimum cumulative GPA for two consecutive terms.
    - ND students must earn a minimum cumulative GPA of 2.1
    - MS students must earn a minimum cumulative GPA of 3.0

The Advising Office can help students understand the impact and consequences of earned and future grades on their cumulative GPA.

Academic Dismissal
Students who are demonstrating unsatisfactory academic progress or are unable to meet the Technical Standards of Admission (if applicable) for their prescribed program of study will be subject to dismissal. A student will be subject to dismissal if:

- The student does not achieve the required program minimum cumulative GPA standard (2.1 ND/3.0 MS) while on Academic Warning II, or
- The student fails one or more clerkships (CLTR course) during a quarter at Sonoran University (ND program only) while on Academic Warning II, or
- The student's projected program completion exceeds the program's maximum completion time, or

- The student fails the same course for the second time during any portion of their enrollment at Sonoran University (a course includes any didactic course or clinical clerkship in the prescribed program of study), or
- The student fails to meet the Technical Standards of Admission (if applicable) for a prescribed program of study.

Should, despite reasonable accommodation (whether the student chooses to use the accommodation or not), a student's existing or acquired disability interfere with patient or peer safety or otherwise impede the ability to meet the Technical Standards for their program and advance to graduation, the student may withdraw or be subject to academic dismissal from the program.

Students who have been dismissed will receive official notification from the Registrar's Office. The dismissal notification will outline the student's rights to an appeal. If a student is reinstated on a dismissal appeal, they are ineligible for academic restoration as outlined in this policy and must meet the requirements outlined in their reinstatement letter.

Academic dismissal from a degree program does not preclude the student from admission to another degree program at Sonoran University. All academic records from the program from which a student was dismissed are reviewed to inform admission decisions.

Academic Dismissal Appeal Process
The student has five (5) business days from the date the dismissal was issued in which to request an appeal to the APPC regarding dismissal. The student and the appropriate program dean will receive written notification from the Dean of Students regarding the outcome of the appeal.

If the dismissal is upheld, the student then has five (5) business days from the date the dismissal was upheld by APPC to appeal in writing to the appropriate program dean, whose decision is final. A student may not enroll in or attend any courses in that program and may not participate in any of that program's sponsored activities while the Dismissal Appeal process is pending. Additionally, they may be barred from Sonoran University's property unless pre-approved permission is provided by the Dean of Students to attend meetings and/or hearings in person.

Students who have been dismissed from an academic program will not be readmitted to that program under any circumstances.

Academic Progress and Policy Committee (APPC)
The Academic Progress and Policy Committee (APPC) is composed of representatives from the Faculty, Registrar, Dean of Students, Academic Advisors, and Financial Aid. During its regular meetings, this committee will make recommendations and decisions concerning a student's standing and review of academic and nonacademic student performance and progress.

Section 6 – Calculating Awards & Packaging

6.10 Academic Year Definition

Policy
The University defines an academic year as 44 weeks of instructional time for the 1st professional degree program and 48 weeks of instructional time for the Master programs. Quarter terms at Sonoran are designated as fall, winter, spring, and summer.

History:
In 1995, the University was approved to use clock hours in its Academic Year definition.

Effective
Effective in 2003, the University converted clock hours to credit hours. Effective in 2014, the University changed the curriculum to allow a 4-year and 5-year track for the ND program. Effective in 2020 and 2024, the University was approved to offer four master's programs.

Purpose
Institutions must establish statutory standards for academic year completion to comply with current Title IV regulatory provisions.

Responsibility
Vice President of Student Affairs and Financial Aid Office.

Impact/Scope
Students, Prospective Students, Business Office, Registrar, Enrollment and Admissions

Communication
Once the policy has been changed, an official announcement will be made to all faculty, students and prospective/incoming students, Student Affairs, Business Office, Registrar and Admissions, as well as other office staff as required.

Procedure
Institutions must establish statutory standards for academic year completion to comply with current Title IV regulatory provisions.

Forms

- None

6.20 Cost of Attendance

Policy
The Tuition and Fees Committee (TFC) outlines the framework and parameters for establishing tuition rates and fees at Sonoran University following an annual review process. The TFC recommends rates for a minimum of one year following a policy that is reviewed annually and maintains the University's priorities of accountability, transparency, growth, and sustainability.

The Financial Aid Director gathers data from the Financial Wellness Survey, the cost of living in Maricopa County, and cost of attendance comparisons from other schools alike to recommend a living expense rate for students at Sonoran University.

History: 1995

Effective: Revised 2007, 2010

Purpose
The Cost of Attendance (COA) refers to an estimate of the expenses the University believes a student will incur during a specific period of enrollment. The COA relates to tuition, fees, books, and living costs estimated from the University's fiscal year, October 1st to September 30th.

Responsibility
Financial Aid Office, Tuition and Fees Committee, and VP of Student Affairs

Communication
Once the policy has been changed, an official announcement will be made to all faculty, students and prospective/incoming students, Student Affairs, Business Office, Registrar and Admissions, as well as other office staff as required.

Procedure
The COA is an estimate of a student's educational expenses for a period of enrollment. The total aid the student may receive from federal student aid programs and other sources cannot exceed the institution's COA.

The components of the cost of attendance are the following:

- Tuition and institutional fees for each program of study
- An allowance for books, supplies, transportation, and miscellaneous/personal expenses
- An allowance for housing and food
- Fees associated with federal student loans (e.g., origination fees)
- One-time purchase of a computer or laptop
- One-time fees associated with medical board exams

Forms

- Financial Wellness Survey
- University Course Catalog

6.30 William D. Ford Direct Loan Program

Policy
The Financial Aid staff is responsible for awarding and packaging federal, private, and institutional aid for which students may be eligible to receive.

History: 1995

Effective: Revised 2010

Purpose
Students may apply for federal and private aid to assist with educational and living costs.

Responsibility
The Financial Aid Office

Communication
Once policy has been changed, an official announcement will be made to students, Student Affairs, Business Office, Registrar and Admissions, as well as other office staff as required.

Procedure
Upon review of the Free Application for Federal Student Aid (FAFSA), students will be packaged and offered aid for every 9-month academic year. The Direct Unsubsidized loan limits for a nine-month academic year are as follows:

- 1st professional degree program: Annual limit - $40,500 / Aggregate limit - $224,000
- Graduate degree programs: Annual limit - $20,500 / Aggregate limit - $138,500

Private loans such as Direct PLUS and Private Educational loans are available should students reach their annual and/or aggregate Direct Unsubsidized loan limit and require the full cost of attendance.

Financial aid packaging occurs through the financial aid system PowerFAIDS. Students are awarded based on the number of credits enrolled for a specific quarter. Students requesting private loans to cover the cost of attendance will be required to apply online and perform a credit check. Once the private loan has been approved, aid will be packaged through PowerFAIDS.

Loan originations and disbursements will be processed through the Common Origination and Disbursement website (COD). Approved loans will be processed on the first day of every quarter and posted to the students' accounts by the third business day. Financial aid will cover student charges; any credit balances will be owed to the student or returned to the Department of Education within 14 days of the disbursement date.

Forms

- FAFSA
- Entrance Counseling
- Master Promissory Note

Section 7 – Special Cases

7.10 Verification Policies

Policy
Verification is the process of confirming the accuracy of certain student-reported data. Only a portion of the student population is selected for verification.

Selection of Applications to be Verified
A student's application may be selected for verification by the Financial Aid staff or by the Central Processing System (CPS), the Department of Education's contract servicer. The Financial Aid staff verifies all applications selected by the CPS for incoming or continuing students. The output documents for those students selected by CPS will have an asterisk next to the SAI on the ISIR and will have a number or letter in the Verification Tracking Flag in the FAA Information Section.

The Financial Aid staff may institutionally select a student for verification if there is a discrepancy or a condition that is unusual and warrants investigation.

Verification Exclusions
In certain cases, verification does not need to be completed if one of the following is applicable:

- The student died during the award year
- The student is in jail or prison at the time of verification
- The student transfer was verified by another school for the current award year
- For independent students, the student's spouse is unavailable: the financial aid advisor cannot verify the spouse's information
- No Title IV funds were disbursed for the award year

If one of these exclusions is used, the appropriate documentation will be maintained in the student's file.

Those students selected for verification will be notified by letter of:
- The documentation needed to satisfy the verification requirements
- The students' responsibilities with respect to the verification of application information, providing deadlines for completing the process, and the consequences of failing to complete the process.

Verification Time Frame
When a student is selected for verification, they are notified by the financial aid office of the documents required to complete the process. The student must submit these documents to the financial aid office in order to resolve any discrepancies and be eligible for Title IV aid.

All students with applications selected for verification, either by CPS or by Sonoran, must complete the verification process no later than 90 days after the last day of enrollment, or by the deadline published annually in the Federal Register (generally August 31 following the end of the award year), whichever is earlier.

For those students who fail to complete the verification process by the specified deadline, any aid awarded for the award year will be canceled. No funds will be disbursed.

Document Collection Procedures
The first step in document collection is to identify everyone whose financial data was reported on the FAFSA (student, spouse), and which tax return, if any, was filed. All documents must have the required signatures (or stamps or other official validations) and must contain all data necessary for verification. The financial aid office sends emails to students notifying them of the required documents.

All documentation submitted must be legible and appropriate. If the student submits documentation that is not legible (i.e., a poor copy of a tax return) or appropriate (i.e. a W-2 form in lieu of the necessary tax form), the student will be contacted for the required documents.

On occasion a student not selected for verification will submit information. The taxes in student files that were not selected for verification will be reviewed for potential conflicting data. All conflicting data will be rectified.

If a student submits documentation that appears to be fraudulent, the Financial Aid Director will notify the VP of Student Affairs.

Verification of Data Elements
The data listed below must be verified:

- Adjusted Gross Income
- U.S. Income Tax Paid
- Untaxed Income
- Household Size
- Number enrolled in college
- High School completion status
- Identity/Statement of Educational Purpose

If the completed verification reveals errors in the student's information that fall outside the tolerance ranges, a new need analysis is generated with the correct information. If necessary, the Financial Aid Director will have the student make corrections to an existing FAFSA and resubmit it.

Notification to Students
Students are notified of any changes as a result of the verification process through a revised emailed award letter.

Updating Requirements
In certain situations, an applicant may be required to update their household size, the number of household members enrolled in a postsecondary educational institution, and dependency status. These items may not be updated if they change only as a result of a change in the student's marital status.

Conflicting Information
Any conflicting information in the student's file must be resolved before the student can receive Federal Student Aid funds. Examples of conflicting information that may be noticed during the verification process may include:

- Unusually low income
- Including dependents in household size and reporting a low income
- Reporting that no tax return was filed, and reporting an income high enough for a tax return to have been required
- Including "others" in the household, such as roommates, adult siblings, etc.

Forms

- FAFSA
- Verification Document

7.20 Professional Judgement

Policy
The Higher Education Act provides the authority for the Financial Aid staff to exercise discretion in a number of areas when a student has special or unusual circumstances. This authority is known as "professional judgment." It allows financial aid administrators to treat a student individually when conditions exist that differentiate that student from a class of students. Professional judgment decisions must be made on a case-by-case basis as a result of examining a particular student's unique circumstances.

At Sonoran University, only the Financial Aid Director has the authority to exercise professional judgment. On an as needed basis, the Director may seek administrative guidance from the VP of Student Affairs. The decision made by the Financial Aid Office is final and cannot be appealed to the University's administration or the U. S. Department of Education.

Professional judgment will be considered only after the student has been awarded and all federal eligibility requirements have been resolved (e.g., verification is complete and all conflicting/inconsistent information has been resolved, etc.).

The law gives the Financial Aid Administrator the authority to request and use supplemental information when making a professional judgment decision. Such supplemental information is important because the special circumstances, as well as the action taken, must be documented in the student's file. If the decision is made that a student's situation does not warrant special consideration, this decision must also be noted and maintained in the file.

Professional judgment policy requires specific documentation (as determined by the Financial Aid Office) to be submitted to the Financial Aid Office along with the Professional Judgement application. The Financial Aid Office must receive all requested documentation before the student's request will be considered for professional judgment. The Financial Aid Office will determine the exact documentation on a case-by-case basis that must be submitted to adequately support the adjustments being requested. Students who do not comply with these requests will have their requests denied.

Professional judgment can be used to change the Federal need analysis formula to adjust the SAI if deemed necessary. In addition, post-enrollment costs or costs not directly related to the academic year being awarded cannot be added to a student's budget to increase the student's cost of attendance.

Effective: 12/1/2004, Revised 2012

Purpose
The Financial Aid Director can exercise discretion in certain areas when a student has special or unusual circumstances that are not adequately addressed by the need analysis system, regulations, or legislation.

Responsibility
Financial Aid Office

Impact/Scope
Students, Prospective Students

Communication
Once policy has been changed, an official announcement will be made to students, Student Affairs, Business Office, Registrar and Admissions, as well as other office staff as required.

Procedures
The Financial Aid Director can exercise discretion in certain areas when a student has special or unusual circumstances that are not adequately addressed by the need analysis system, regulations, or legislation. The Department of Education does not regulate professional judgment. The Higher Education Act gives authority to the Financial Aid Administrator to exercise professional judgment in the following areas:

- Data elements used to calculate the Student Aid Index (SAI)
- Cost of attendance (COA)

The following circumstances might trigger the use of professional judgment at Sonoran:

- Dependent care expenses for child and/or family member
- Elementary/secondary tuition expenses
- One-time computer reimbursement
- Emergency Medical/Dental expenses

The Financial Aid Office will adjust a student's financial aid package/award if the professional judgment outcome increases a student's aid eligibility. The school will first re-evaluate the student's federal loan eligibility to ensure the maximum unsubsidized loans is awarded. If the student has requested/accepted a FWS job, the FWS award will be adjusted if needed. Lastly, the Financial Aid Office will re-evaluate the students' maximum eligibility for private student loans. The student will be notified by the Financial Aid Office with the results once the professional judgment evaluation has been completed.

Forms
- Professional Judgement application

Section 8 – Processing Loans

8.10 Entrance Counseling

Policy
The Financial Aid Office provides financial literacy education to prospective students and current students about federal aid availability and offers them solutions and guidelines to help fund their educational journey.

History: 1995

Effective: 2007, 2010, 2012

Purpose
The Financial Aid Office is responsible for counseling prospective, current, and alumni students to provide them with the most accurate and precise information about their Federal Student Loans. The Financial Aid Office is to provide resources to help finance their graduate education.

Responsibility
The Financial Aid Office, students, and alumni

Procedure
The Financial Aid Director will provide in-person counseling during the following Sonoran events:

- Student for A Day
- Interview Day
- New Student Orientation
- Financial Literacy education through focus groups, one-on-one counseling, surveys

Financial Aid recipients who borrow federal loans will also be required to complete the online entrance counseling offered through the Department of Education. To continuously educate and provide resources for graduate students, the Financial Aid staff will provide financial literacy education discussing the following:

- Personal financial budgets
- Financial Aid projections in relation to the cost of attendance
- Understanding of federal and private student loan information
- Understanding of repayment plans, loan forgiveness programs, and loan consolidation

Forms

- Loan Entrance Counseling through Federal Student Aid
- Budget worksheets
- Financial aid projections

8.20 Master Promissory Note (MPN)

Policy
All Students requesting financial aid are required to complete a Master Promissory Note (MPN) for the Direct Unsubsidized Loan and/or Private Student Loans.

Purpose
The MPN is the borrower's contract regarding their rights and responsibilities as a borrower. The MPN completion will be required prior to the origination of federal and/or private student loan.

Responsibility
Students

Procedure
All financial aid recipients will be required to fill out the MPN prior to their first student loan being originated. This includes new students, transferring students (even if they have an MPN on file with another school), and readmitted students. The online MPN is located at https://studentaid.gov/.

Once a student has completed the initial MPN, the financial aid office will certify all loans up to the cost of attendance for each academic year. If a student does not require the full amount of eligibility, it is their responsibility to notify the financial aid office, in writing, within two weeks of receiving their award letter, indicating the amount they wish to receive. Students also have the option to return, within 14 days of disbursement, all or part of their financial aid to the Department of Education.

Forms
- Master Promissory Note

8.30 Loan Origination and Disbursement

Policy
The Financial Aid Office will process Direct Unsubsidized and Direct PLUS Loans through the Common, Origination and Disbursement (COD) website for all eligible students.

History: 2010

Effective: 2010

Purpose
The Department of Education requires that all federal loans go through a process of origination at least seven days before disbursement. Student loans under the William D. Ford Direct Loan Program are required to be approved through the COD website.

Responsibility
The Financial Aid Office

Procedure
Student eligibility
1. MPN is on file for the correct type of loan
2. Entrance Counseling is on file for the correct type of grade level
3. Review ISIR for overlapping loan periods, NSLDS information, and comment codes

Package and Award
1. Package an award based on credit load and cost of attendance
2. Email the offer letter to the financial aid recipient
3. If changes are needed to the award, changes will be completed before originating a federal loan
4. Confirm that the awards have been accepted by the student

Origination and Disbursement Process
1. Origination and disbursements will be processed from PowerFAIDS to EDconnect to COD
2. If approved, COD will release a report to EDconnect, which will then be imported into PowerFAIDS
3. If loans are approved, the Financial Aid Director will create an actual FA batch from PowerFAIDS to J1
4. The FA batch will be provided to the Business Office on the first day of the quarter, and posting to students' accounts must be completed by the third business day
5. If any credit balances exist on the student's account, these will be processed to the student or returned to the Department of Education within 14 days of the disbursement date. Credit balances owed to the student will be completed upon enrollment verification.

Forms
- Master Promissory Note
- Entrance Counseling
- ISIR
- Financial aid award letter
- FA batches

Section 9 - Disbursement of Funds

9.10 Separation of Functions

Policy
The University will comply with all federal regulations regarding the offices that are responsible for the disbursement of funds. A clear and distinct separation of functions between the Financial Aid Office and the Business Office will be maintained.

History: 1995

Effective: 1995

Purpose
To reduce the risk of error or inappropriate action.

Communication
Once policy has been changed, an official announcement will be made students, Student Affairs, Business Office, Registrar and Admissions, as well as other office staff as required.

Procedure
The Financial Aid Office ensures the accurate and appropriate awarding of Title IV aid, private loans, and scholarships. The Financial Aid Office checks the students' eligibility and enrollment status. This information will be forwarded to the Business Office, approving funds to be credited to the students' accounts.

The Business Office has the responsibility for posting and processing credit balances. The Business Office will post aid to the students' accounts within three (3) business days and process credit balances within 14 days of the disbursement date.

Forms

- DOE Enrollment Report
- Actual financial aid batch

9.20 Mandatory Attendance

Policy
Attendance will be taken during the first week of the start of classes by Sonoran faculty. The Financial Aid Office will verify each student's attendance to ensure the disbursement of Financial Aid refund checks.

History: 2008

Effective: 2008

Purpose
To comply with the Department of Education's policy regarding attendance during the first week of classes. Once attendance has been verified, the student will be entitled to receive their financial aid refund check.

Responsibility
Faculty, Financial Aid Office, and Business Office

Impact/Scope
Students

Communication
Once the policy has been changed, an official announcement will be made to all faculty, students, Student Affairs, Business Office, Registrar, and Admissions, as well as other office staff as required.

Procedure
The Financial Aid Director will email Sonoran's full-time faculty and adjunct faculty on the first day of every quarter, providing reminders of the attendance policy. Attendance is to be completed online through Canvas.

The Financial Aid Office will verify each student's attendance, and as the financial aid staff reviews weekly refund lists provided by the Business Office, attendance will be marked for those actively engaged in class.

If students do not have attendance on file, the Financial Aid Director will contact the faculty member and the Registrar's Office to confirm a student's enrollment for the quarter.

Forms

- Attendance Rosters from Canvas
- Attendance Rosers from Drop-Out Detective

9.30 Late Disbursements

Policy
If funds are received after the end of the loan period/academic year, if a student has withdrawn after completing more than 60% of the academic year quarter, or has graduated, the University will determine if the student is eligible for a late disbursement.

Communication
Once policy has been changed, an official announcement will be made to all faculty, students, Enrollment, Business Office, Registrar and Admissions, as well as other office staff as required.

Procedure
If funds are received after the end of the loan period/academic year, if a student has withdrawn after completing more than 60% of the academic year quarter, or has graduated, the University will determine if the student is eligible for a late disbursement.

Student eligibility for a late disbursement is contingent upon the following conditions:

- The loan must be certified on or before the end of the loan period or graduation date.
- The student must meet all eligibility criteria (i.e., SAP, admission criteria).
- The disbursement must be made within 120 days of the end of the loan period, withdrawal date, or graduation date.
- The disbursement can be made beyond the 120 days if it is due to no fault of the student, and the school appeals to the Department of Education. In such a case, the Financial Aid Director will contact the Department of Education to request disbursement.

In the case of a late 1st disbursement:
- If there is a withdrawal date in the academic year (AY), and the student has completed more than 60% of the AY quarter, the student may be eligible for a late disbursement.

In the case of a late 2nd or 3rd disbursement:
- If there is a withdrawal date in the AY, the student may be eligible for a late disbursement if he or she has completed all of the loan period/academic year.

Forms
- None

9.40 Scholarship Disbursement

Policy
Scholarship disbursements will be included in the students' cost of attendance and posted on their student accounts.

History*:* 1996

Effective*:* Revised 2010

Purpose
Scholarship awards provided to students will be included in their cost of attendance and posted on their student account. If external scholarship awards are provided after the start of a quarter and the Financial Aid Director has no prior knowledge of the award, professional judgment will be made to ensure an over-award does not exist.

Impact/Scope
Business Office, Financial Aid Office, Award Recipients

Communication
Once the policy has been changed, the Financial Aid Office must notify the Business Office.

Procedure
The Financial Aid Office will provide the Business Office with an FA batch before the start of the quarter, listing scholarship recipients and their awards.

All scholarships will be credited to the students' financial accounts. Scholarship awards will be included in the cost of attendance for all financial aid recipients. Sonoran scholarship awards provided to new students will be disbursed in two or four consecutive quarters. Sonoran scholarships provided to enrolled students may be disbursed in one quarter or two consecutive quarters, depending on donor requests. If the student does not meet enrollment policies, they forfeit their right to the scholarship award.

Forms

- Scholarship applications
- Scholarship award letters
- FA batch

9.50 Loan Disbursement Notification

Policy
The University, in compliance with Federal regulations, will notify students of the amount of Title IV loan funds they can expect to receive.

History: 2007

Effective: 2007, 2010

Purpose
To provide students with ample time to review the University's cost of attendance, the types of aid available, the total amount awarded, the institution's cohort default rate, graduation rates, and financial literacy information.

Responsibility
The Financial Aid Office

Communication
Once policy has been changed, an official announcement will be made to students, Student Affairs, Business Office, Registrar and Admissions, as well as other office staff as required.

Procedure
Students will be notified via email and through their financial aid student portal of the amount of Title IV aid they can expect to receive. Financial aid offer letters will be delivered to students one to two months before the start of the quarter.

The Business Office will notify students to review their student account statements two weeks prior to the start of the quarter. Student account statements will be available on MySonoran.

Forms

- Financial aid offer letter
- Student Account Statement

9.60 Processing Disbursement Rosters and EFTs

Policy
The Financial Aid Office will process FA batches listing student award amounts, and the Business Office will process EFTs or checks in a timely manner and in accordance with federal regulations.

History: 2010

Effective: 2010

Responsibility
The Financial Aid Office and the Business Office

Communication
Once policy has been changed, an official announcement will be made to students, Student Affairs, Business Office, Registrar and Admissions, as well as other office staff as required.

Procedure
The Business Office will run actual charges on the first day of the quarter, followed by the Financial Aid Office providing the Business Office with an FA batch listing loans and scholarship information.

Once loans and scholarships are applied to the student accounts and attendance has been verified, the net difference between aid and tuition and fee charges results in an amount due to the student or an amount due from the student. Amounts due to students are provided in the form of a live check or directly deposited into student bank accounts. Disbursements issued to students will be released within 14 days of the disbursement date.

Forms

- FA Batches
- Attendance Verification

Section 10 - Refund Policy

10.10 Return of Title IV Aid

Policy
The Financial Aid Office must perform a return of unearned aid for students who do not complete the program of study or drop classes within their period of enrollment. The University is responsible for completing the return of Title IV aid in an accurate and timely manner as addressed by federal regulations.

History*:* 1999

Effective*:* 1999, 2010, 2021

Purpose
The University must determine the student's last date of attendance in order to calculate the earned and unearned tuition amount. Unearned amounts of Title IV aid must be returned to the Department of Education within 45 days.

Responsibility
Financial Aid Office and Business Services.

Impact/Scope
Students, Prospective Students, Business Office, Registrar's Office, and Dean of Students

Communication:
Withdrawal and drop/add policies are published in the University's course catalog and student handbook. If the policy has changed after the annual course catalog is published, an official announcement to all faculty, students, and prospective students, Student Affairs, Business Office, Registrar, Admissions, as well as other office staff as required.

Procedure
The Financial Aid Office is responsible for returning unearned aid should a student withdraw from the program of study or drop classes during the period of enrollment. Return of Title IV aid (R2T4) shall not be performed if the student is only awarded Federal Work Study (FWS) or the student is not a recipient of Title IV aid.

Withdrawal

- Students who withdrew before the start of the quarter, 100% refund of tuition and fees will be returned to ED
- Students who withdrew after the start of the quarter, a Title IV calculation will be performed to determine the prorated percentage of tuition and fees that will be returned to ED
- Students who withdrew at the 60% completion rate or at the end of the quarter have met 100% completion, which results in zero percent of tuition and fees refunded to ED
- Students who withdraw from module sessions completing 49% with passing grades are not considered withdrawn, and no R2T4 calculation is required

Drop Courses

- Students who drop courses during the census date, 100% of the tuition and course-specific fees will be returned to ED
- Students who drop courses after the census date, no refund of tuition and course-specific fees will be performed

The Financial Aid Director will be responsible for initiating the calculation of the R2T4 if a student withdraws before the 49% for modules or 60% completion of the term. The calculation and management of the R2T4 will be completed online through https://cod.ed.gov/cod/LoginPage. The Financial Aid Director will use Sonoran's Withdrawal documentation to determine the last date of attendance and a copy of the student account statement to determine the cost of tuition and federal aid awards. Copies of the final packet containing the R2T4 calculation, Withdrawal documentation, and student account statement will be provided to the Business Office and the Registrar's Office.

Prior to refunding the Department of Education (ED) the unearned tuition amount, the Senior Accountant will serve as the secondary reviewer to ensure the R2T4 calculation reflects the correct amount and is the sole document when determining the amount of unearned aid being returned to ED. Upon approval of the review, the Financial Aid Director will process the R2T4 through PowerFAIDS and the Common Origination and Disbursement site. Consequently, an FA batch will be created through J1 to allow the Business Office to process the R2T4 through G5. Last, the Financial Aid Director will update the student's enrollment through NSLDS.

In the event of a withdrawal, enrollment status falling below half-time, or graduation, the Financial Aid Director will provide an exit counseling session with the student. The exit counseling will consist of discussing repayment options, deferments and forbearances, loan consolidation, and loan history information. If Title IV aid is returned to the Department of Education, the Financial Aid Director will communicate via email to the student the amount being returned. Students will also be required to complete the online exit counseling through the Federal Student Aid website to comply with federal regulations.

Forms

- Withdrawal documentation
- Student Account Statement
- Return of Title IV Aid calculation: https://cod.ed.gov/cod/LoginPage
- Exit Counseling: https://studentaid.gov/

10.20 Prevent Escheating

Policy
The Financial Aid Office and Business Office must prevent the escheating of Title IV funds.

History*:* 2016

Effective*:* 2016

Purpose
The Business Office will review at the end of each month, all outstanding uncashed checks, undeliverable checks and rejected EFT transfers containing Federal Student Aid funds. In order to prevent the escheating of Title IV aid, the Business Office and the Financial Aid Office will follow federal guidelines to restore funds within a timely manner and to the applicable Federal Student Aid program.

Responsibility
Financial Aid Office and Business Services.

Impact/Scope
Students, Business Office, Financial Aid Office

Communication
The Business Office and Financial Aid Office will communicate with students via email, by phone and/or in person whose federal funds remain uncashed, undeliverable or EFT rejected.

Procedure
Undeliverable or EFT Transfers Rejected

If federal student aid funds are issued as checks and returned to the institution as undeliverable or an EFT transfer has been rejected, the Business Office will make an additional attempt to deliver the funds to the student within 45 days, not to exceed 240 days from the initial attempt to deliver federal student aid funds. Upon reaching the 240-day limit, if funds remain unclaimed, the Financial Aid Office will return the funds to the Federal Student Aid program.

Uncashed Checks

The business office will review, at the end of each month, any federal aid checks that remain uncashed. Prior to the 180th day, all outstanding uncashed checks will be voided, and the Financial Aid Office will return funds to the applicable Federal Student Aid program.

Section 11 – Department of Education Compliance

11.10 Enrollment Reporting

Policy
The Financial Aid Director will report enrollment through the National Student Loan Data System (NSLDS) every 30 days or at the time of a student's enrollment change due to falling below half-time status, leave of absence, or withdrawal.

History: 2010

Effective: 2010

Purpose
Enrollment reporting is mandatory through the Department of Education. Reporting will be completed through NSLDS and will provide the Department of Education with updated student information.

Responsibility
Financial Aid Office

Procedure
The Financial Aid Director will update the following on NSLDS by the 15th day of the month being reported:

- Student enrollment status
- Anticipated completion date
- Program of Study code
- Enrollment date
- Student's demographic information if changes are needed

Forms
- Online enrollment through the National Student Loan Data System

11.20 William D. Ford Direct Loan Program Reconciliation

Policy
Reconciliation of Direct Loans will occur quarterly and at the end of the academic year. Reconciliations will occur between the Common Origination and Disbursement Web Site (COD) and G5.

History: 2010

Effective: 2010

Purpose
To ensure that all Direct Loans, such as disbursements and refunds, balance internally and externally.

Responsibility
Financial Aid Office and the Business Office

Procedure
Monthly Reconciliation
The Financial Aid Director and the Business Office will perform monthly reconciliations. COD and G5 will be reviewed to ensure that disbursements and/or refunds balance to zero. Should there be a discrepancy in amounts, the Financial Aid Director will review disbursements and refunds and resolve any issues within 30 days.

The Business Office will create internal reports with student account information to ensure that all accounts are at a zero balance. COD and G5 will be reconciled at a zero balance before the start of a new quarter.

End of the academic year Reconciliation
The Financial Aid Director will review each quarter during the academic year to ensure that by June 30th, the total funding level in COD is at zero balance. The Financial Aid Director will complete the School Balance Confirmation form through COD, providing the School Ending Cash Balance and date. If approved, the Department of Education will provide a close-out letter to the University for the academic year.

Forms
- Student account statement reports
- School Balance Confirmation page: https://cod.ed.gov/cod/LoginPage
- Close-out letter from ED

11.30 Gramm-Leach-Bliley Act (GLBA)

Policy
Sonoran will ensure that the confidentiality, security, and integrity of student information is maintained within departments, third-party servicers, and any other partners within the University's systems.

Updated: January 2020

Purpose
Sonoran addresses the GLBA institutional requirements with the intent toward safeguarding both student and institutional information assets, including (but not limited to):

- Student personal information
- Student academic information
- Student financial information
- Sonoran financial information

Responsibility
IT, Student Affairs, Business Office, Library, Academics, Administration

Procedure
GLBA specifies management around three distinct requirements:

1. The Privacy Rule – regulation of the collection and use of non-public information (NIP)
2. The Safeguards Rule – requiring financial institutions to implement a security program to protect non-public information
3. Pretexting provisions – controls prohibiting access to non-public information under false pretense

Sonoran Information Systems Overview
Student and institutional data are stored, managed, and accessed through specific information systems:

- Sonoran Student Information System (SIS) – Jenzabar EX – On-premise deployment
- Sonoran Financial Aid Management System (FAMS) – College Board PowerFAIDS / NetPartner – On-premise deployment
- Sonoran Learning Management System (LMS) – Instructure Canvas – Hosted deployment

Systems Access/Operating Environment Overview
The following staff groups have been granted operations access to the above systems. Students have access only through the system-provisioned student access portals that are incorporated into the products (i.e., web-based access/functionality specifically tailored to student access of his/her specific content).

<u>IT Staff</u>

- Appropriate team members have access to SIS, FAMS, LMS systems.
- Each individual has a unique, non-shared credentials into the appropriate systems

Financial Aid Staff
- Role-based access into the above systems based on position and responsibilities
- Each individual has a unique, non-shared credentials into the appropriate systems

Business Office Staff
- Role-based access into SIS system based on position and responsibilities
- No access to FASM, SIS systems
- Each individual has unique, non-shared credentials into the appropriate systems

Executive Staff
- Limited to specific individuals charged with oversight/management of business operations (VP Academic Affairs, VP Student Affairs)
- Each individual has unique, non-shared credentials into the appropriate systems

On-Premise Infrastructure
- SIS, FASM systems are deployed and maintained by the Sonoran IT team utilizing on-premise datacenter infrastructure
- Windows server-based systems
- Microsoft SQL server database management
- Sophos-based anti-malware system
- Meraki gateway firewall/intrusion prevention system
- Cisco-based network infrastructure

Client Endpoints
- System access to SIS, FASM is restricted to Sonoran-provisioned computers only
- Windows 10 operating system
- Sophos anti-malware system
- Active Directory-based authentication
- Operating system administrative privileges disabled for non-IT personnel
- For remote access-VPN connectivity is required

Systems are accessed by the above administrative groups in the following manner:

Jenzabar (SIS)
- Jenzabar EX client – installed on Sonoran-provisioned computers only
- Client application managed/updated by Sonoran IT team – end-users are unable to install/modify endpoint installations
- Authentication based on Active Directory
- Access control based on roles/access control mechanisms embedded in the application

College Board PowerFAIDS/NetPartner (FAMS)
- PowerFAIDS client installed on specific Financial Aid team computers only
- Client application managed/updated by Sonoran IT team – end-users are unable to install/modify endpoint installations
- Access control based on roles/access control mechanisms embedded in the application

Canvas Learning Management System (LMS)

- Web-based access utilizing contemporary web browsers – browser compatibility/access governed by Canvas specifications (i.e., access to system by outdated browser)
- Access control based on roles/access control mechanisms embedded in the application

Risk Assessment and Mitigation – Security Plan

The primary requirement for GLBA is that of operational risk assessment, mitigation strategy formulation, and strategy execution. Sonoran has developed an initial strategy based on preliminary compliance objectives. This strategy will be reviewed, adjusted, and improved based on evolving operational parameters, compliance requirements, and the University's needs. The IT team has had discussions with the Financial Aid team, the Registrar team, and the Business Services team as part of its support alignment with their operations' needs. More formal discussion groups that generated insight into related processes and risks included entities such as:

- Student account lifecycle task group
- Online Infrastructure Committee

Based on the above internal review and discussion activity, the following risk categories and mitigation strategies have been identified by Sonoran administrative units. Risk factors identified have been designated with the following status indicators:

- In-place: Risk factor control active/in production.
- In process: Risk factor control currently being implemented – anticipated completion timeframe is listed.
- Planned: Risk factor control is being planned for implementation.
- Pending: Risk factor is acknowledged and is queued for planning

Physical Security

Risk: Physical access to on-premise systems

Context: Capacity for unauthorized access to gain physical access to Sonoran on-premise datacenter systems.

Mitigation Strategies – discovered factors and implementation status

- In place – badge access to building – only active faculty/staff/students have access to the building in general.
- In place – dual-door security locks – datacenter is accessible only to IT/Facilities teams via specific combination-based access locks.
- In-place – camera surveillance to record access into/out of decenter.
- In process – heightened security through implementation of additional/separate door access code.

Physical Security – Disaster Recovery/Business Continuity

Risk: Loss of information/operations due to a physical disruption event (fire, etc.)

Context: On-premise data systems' exposure to disaster events such as fire, water damage, storms, catastrophic hardware failure, etc.

Mitigation Strategies – discovered factors and implementation status

- In place – dual-tiered backup system in place for daily backups to local restore points (for quick recovery) and off-campus, secured hosted service provider for daily backup capacity.

- In-place – backup system status notifications – primary/secondary IT team member notification of backup job performance.
- In-place – environmental systems monitors (temperature, etc.) to notify IT team of out-of-threshold operating conditions.
- In-place – operating environment resilience:
  - Use of virtual machine (VMWare) infrastructure for all Sonoran servers
  - Multiple physical hosts provide operating resilience
  - High-end data storage array with multiple physical drives/redundancy to reduce single point of failure
  - Event notification system (What's Up Gold) provides email-based notification of downtime events
  - All datacenter hardware supported covered by hardware replacement support contract – 4-hour response time SLA
- In process – Formalized restore simulation testing – scheduled/documented data restore process – completed by 12/2020.
- Planned – Co-location capability for mission-critical systems – leverage off-premise hosted partner to co-locate critical functions in event of disaster – completed by 2/2021.
- Planned – Migration of SIS, FASM to hosted environments – planning in process – goal of 9/2021.

Information Systems Security

Risk: External Data Breach
Context: Vulnerability to external malicious actors, either denying access to or gaining unauthorized access to non-published data (NIP).
Mitigation Strategies – discovered deficits and implementation status

- In place – application clients only installed/sanctioned on Sonoran-provisioned computers.
- In-place – Sonoran client endpoints secured with industry-standard anti-malware system (Sophos, Microsoft Exchange Online Protection, etc.).
- In-place – disaster recovery/business continuity strategies outlined above (for recoverability of data should it be needed).
- In-place – newly-installed Meraki firewalls provide state-of-the-art firewall, intrusion detection, and intrusion prevention capabilities.
- In-place – limited administrative access to systems – non-IT employees have limited administrative credentials based on specific roles/responsibilities.
- In-place – IT team has separate, unique administrative credentials. Policy requires that non-admin (day-to-day) work be accomplished using standard, non-admin credentials to limit exposure.
- In-place – Active Directory account security.
  - Complex passwords
  - Password change requirement
  - Account lockout
- In-place – annual third-party security assessment – initial assessment completed approx. 11/2019. Scheduling the current year assessment to occur by 12/2020.
- In-place – patch management for endpoint computers and servers.

- In-place – software updates for SIS (min. once/annually or as needed to incorporate security updates) and FASM (as released by vendor due to address new compliance/security updates).
- In-place – firewalling internal systems to limit exposure to only the appropriate ports/functionality needed for on/off-campus students, employees, etc.
- In process – advanced firewall notification of specific intrusion detection events – completed 12/2020.
- In process – formal breach notification strategy – completing documentation for process/personnel assignment, accountability, etc. – completed 12/2020.
- In process – building enhanced syslog server capability for build more in-depth forensic analysis capability – completed 2/2021.

Risk: Internal Accidental/Malicious Data Breach

Context: Vulnerability to internal employee inappropriate/malicious access to NIP. Vulnerability to accidental employee data corruption/deletion.

Mitigation Strategies – discovered deficits and implementation status

- In-place – Active Directory-based access to SIS system.
- In-place – on-campus wireless security firewalls systems access for employee access vs. student/guest access.
- In-place – physical security – on-campus network ports locked to curtail unsanctioned access.
- In-place – employee off-boarding process to disable access to appropriate systems where needed.
- In-place – annual account reconciliation to identify and disable employee accounts for separated employees.
- In-place – data backup/restore system noted above to restore accidentally-deleted data should the need arise.
- In-place – segregation of duties where applicable/possible.
    - Example: Student financial aid refund disbursement.
- In-place – employee orientation training – overview of security best practices for incoming employees.
- In-place – on campus rogue access point identification.
- In process – updating employee security awareness documentation to reinforce communications security policies, etc. – completed 2/2021.
- In process – LMS authentication based on Azure Active Directory to centrally control LMS access – completed 2/2021.
- In process – annual review of application account access for active employee accounts – completed 2/2021.
- Planned – migration to hosted versions of SIS, FASM to build on new access control/reporting capability – goal of 9/21.
- Pending – evaluate AD / Azure AD authentication for PowerFAIDS/NetPartner FASM.
- Pending – utilization of event notification system to support real-time event notification for specific SIS, FASM, LMS access events.
- Pending – granular activity log capability in SIS, FASM systems.

- Pending – implementation of RADIUS authentication for wireless system access – will be based on Microsoft Active Directory account.

Risk: Software Compliance/Security Vulnerability
Context: Ensuring that hosted systems/applications used currently meet/continue to meet compliance standards.
Mitigation Strategies – discovered deficits and implementation status

- In-place – prioritization of software updates based on financial information risk/exposure
  - PowerFAIDS/NetPartner (FASM) – updates installed as released by vendor.
    - Only general release updates installed – interim / beta software not installed.
    - Jenzabar EX – minimum annual upgrade / security vulnerability patches if needed.
    - Only general release updates installed – interim / beta software not installed.
    - Canvas LMS – hosted system – updates managed by vendor (Instructure).
- In-place – annual verification of compliance certification by all Sonoran hosted systems, i.e.:
  - Canvas LMS system
  - Jenzabar EX
  - PowerFAIDS/NetPartner
  - Office 365
  - Panopto video management
  - Respondus LockDown Browser
  - eClinicalWorks electronic heath records system
- In-process – SIS client application update to all appropriate Sonoran computers – completed 12/2020
- Planned – migration to hosted versions of SIS, FASM to build on new access control/reporting capability – goal of 9/21.

Risk: Process Awareness/Documentation / Knowledge Retention
Context: Ensuring that business operations and processes remain intact due to employee separation, etc.
Mitigation Strategies – discovered deficits and implementation status

- In-place – utilization of vendor training resources where appropriate
- In process – enhance current employee annual training with expanded security awareness content – ongoing.
- In process – process documentation initiatives to capture business processes for reference by appropriate current/future staff – ongoing.

Risk: Privacy Rule Awareness
Context: Build a formalized, documented, and executed privacy rule notification process for students and applicable Sonoran employees. This would include privacy awareness, privacy notices, opt-out awareness, etc.
Mitigation Strategies – discovered deficits and implementation status

- In-place – faculty/staff FERPA awareness/notification
- In-place – incoming/annual student FERPA awareness notification
- In-place – Opt-out notification/process for students – conducted by Registrar.
- In-process – formalized, tracked FERPA training to appropriate faculty/employees using third-party training tools – process completed 2/2021.