6.4 Student Financial Aid Policies

6.4.1 Consumer Information Policy

CONSUMER INFORMATION POLICY

<table>
<thead>
<tr>
<th>Effective Date:</th>
<th>May 8, 2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy Number:</td>
<td>VI – 6.4.1</td>
</tr>
<tr>
<td>Supersedes:</td>
<td>Not Applicable.</td>
</tr>
<tr>
<td>Issuing Authority:</td>
<td>President</td>
</tr>
<tr>
<td>Responsible Officer:</td>
<td>Vice President for Enrollment Management</td>
</tr>
<tr>
<td>Applicability:</td>
<td>All members of the Canisius College community, the Department of Education, and the public.</td>
</tr>
<tr>
<td>History:</td>
<td></td>
</tr>
</tbody>
</table>

PURPOSE

The purpose of this policy is to comply with the Higher Education Opportunity Act (HEOA), as well as other federal regulations, which require colleges and universities that participate in federal student financial aid programs to disclose certain information to current and prospective students, employees, and others.

POLICY

In compliance with Higher Education Opportunity Act (HEOA), as well as other federal regulations, it is the policy of Canisius College to disclose to the public and report to current and prospective students, employees, the Department of Education and others information about: financial aid offered at the college; the college’s campus and facilities; Intercollegiate Athletic Program Participation Rates and Financial Support Data; gainful employment programs; campus security and fire safety, as well as drug and alcohol abuse prevention programs; and counseling programs provided to students receiving federal student aid loans and the disclosures that must be made for private education loans.

DEFINITIONS

Not Applicable.

PROCEDURES/GUIDELINES

In compliance with the HEOA, Canisius College posts the consumer information set forth below on the college’s website at [https://www.canisius.edu/academics/office-academic-affairs/higher-education-opportunity-act-information](https://www.canisius.edu/academics/office-academic-affairs/higher-education-opportunity-act-information).

General Institutional Information:

**Academic Programs:** Canisius College provides information regarding its educational programs on the college website at [http://www.canisius.edu/academics/](http://www.canisius.edu/academics/), as well as in the college catalogs.

**Accreditation:** A list of all agencies that accredit Canisius College and its specific programs is provided in the college catalogs, as well as on the college website at [https://www.canisius.edu/about/distinctions/academic-accreditation](https://www.canisius.edu/about/distinctions/academic-accreditation).

**College Navigator:** Consumer information regarding Canisius College is available on the college Navigator website at [http://nces.ed.gov/collegenavigator/?q=canisius+college&s=all&id=189705](http://nces.ed.gov/collegenavigator/?q=canisius+college&s=all&id=189705).

**Peer-to-Peer File Sharing/Copyright Infringement Policies and Sanctions:** Canisius College Copyright policies are set forth in Volume II of the *Canisius College Policy Manual*, as well as on the college website and other various college publications.

**Computer, Communication, and Network Technology Acceptable Use Policy:** The college’s Acceptable Use of Computer and Technology Systems Policy (see Volume II the *Canisius College Policy Manual*) sets forth the college’s institutional computer use policies and guidance.
Facilities and Services for Students with Disabilities: Information regarding college campuses and facilities is available on the college website, as well as the catalogs and Student Handbook. The Griff Center for Academic Engagement provides support services to students with documented disabilities. See the college website, as well as the college catalogs and Student Handbook for additional information regarding The Griff Center for Academic Engagement.

Faculty: A listing of college instructional personnel and their academic credentials is available in the college catalogs.

Student Diversity: Canisius College annually calculates information relating to the diversity of its students, including the percentage of enrolled, full-time students in the following categories:

- Male
- Female
- Self-identified members of a major racial or ethnic group

This information is posted on the college website at https://www.canisius.edu/academics/office-academic-affairs/higher-education-opportunity-act-information

Net Price Calculator: Canisius College provides a net price calculator on its website that assists students in estimating their net cost of attendance at https://canisius.studentaidcalculator.com/welcome.aspx

Price of Attendance: Information regarding the costs of attending Canisius College is posted on the college's website at https://www.canisius.edu/tuition-aid/student-records-and-financial-services/cost-attendance#gradtuition

Privacy of Student Records - FERPA: Canisius College annually publishes to enrolled and prospective students a notice of FERPA rights in the college catalogs. In addition, the college's Student Records (FERPA) Policy is published in Volume II of the Canisius College Policy Manual.

Refund and Withdrawal Information: Canisius College policies regarding refunds and withdrawal are available in the college catalogs.

Student Activities: A listing of available student activities is provided in the Student Handbook, as well as the college's website at https://www.canisius.edu/student-experience/student-life-and-housing/student-involvement

Textbook Information: The Bookstore provides information on what textbooks students will need for the classes they select. Textbook information is organized by Course Title, Section Number and Instructor, and the information provided regarding textbooks includes Title, Author, Edition, ISBN # and pricing information.

Transfer of Credit Policy/Articulation Agreements: Policies addressing the transfer of credit are available in the college catalogs, as well as on the college website at https://www.canisius.edu/admissions/undergraduate-transfer-admissions/transfer-articulation-agreements

Articulation Agreements: Canisius College publicly discloses and makes available a list of institutions with which it has articulation agreements. This is available on the college website at https://www.canisius.edu/admissions/undergraduate-transfer-admissions/transfer-articulation-agreements

Financial Assistance Information and Related Policies

Notice of Availability of Financial Aid: Contact Information for Assistance in Obtaining Institutional or Financial Aid is available in the college catalogs, as well as on the college website at https://www.canisius.edu/tuition-aid/student-records-and-financial-services/cost-attendance#gradtuition

Assistance Available from Federal, State, Local and Institutional Programs: Information regarding the various types of financial assistance available to Canisius College students may be found on the college website at https://www.canisius.edu/tuition-aid/student-records-and-financial-services/cost-attendance#gradtuition

Federal Student Financial Aid Penalties for Drug Law Violations: Canisius College provides to each student, upon enrollment, a separate, clear, and conspicuous written notice that advises the student that a conviction for any offense, during a period of enrollment for which the student was receiving Title IV, HEA program funds, under any federal or state law involving the possession or sale of illegal drugs will result in the loss of eligibility for any Title IV, HEA grant, loan, or work-study assistance. In addition, the college includes this information in Volume II of the Canisius College Policy Manual.

Terms and Conditions of Accepting Financial Aid Award: Terms and conditions of accepting financial aid awards are set forth in the Undergraduate and Graduate Catalogs.

Satisfactory Academic Progress and Financial Aid Eligibility: Canisius College policies regarding academic progress and financial aid eligibility are set forth in the college catalogs. In addition, the college’s academic progress policies are available in Volume VI the Canisius College Policy Manual.

Initial Loan Counseling for Student Borrowers: Before receiving a student loan, borrowers must complete an entrance counseling session on the federal loan website, which will provide useful tips and tools to help borrowers develop a budget for managing their educational expenses and help them understand their loan responsibilities.

Exit Counseling for Student Borrowers: Prior to graduating or leaving school, loan borrowers must complete exit counseling. During the exit counseling, borrowers will learn about their rights and responsibilities and repayment options.

Student Lending Code of Conduct: Canisius College has adopted a Student Lending Code of Conduct, which is posted on the college website at: [Insert link].

Preferred Lender Information: Information regarding preferred private loan lenders may be found at https://www.canisius.edu/tuition-aid/scholarships-financial-aid/loans

Health and Safety Information

Drug and Alcohol Abuse Prevention Program: Canisius College annually prepares and distributes to all students, faculty, and staff information regarding its alcohol and drug abuse prevention programs. This information is included in Volume II of the Canisius College Policy Manual and other designated college publications.
Vaccination Policies: College policies regarding required student vaccinations and immunizations are set forth in the college catalogs. In addition, the college’s Immunization Policy is published in the catalog.

Campus Security Policies, Crime Statistics, and Crime Log: The college annually provides a report that provides a detailed disclosure of information regarding campus security practices (including Emergency Response Plan, Timely Warnings, Emergency Warnings, Missing Persons and Crime Log policies), as well as crime statistics for the preceding year. Additional information and the college’s crime log are available in the Department of Campus Safety and Security. In addition to the above, the college’s campus security policies are published in the Canisius College Policy Manual.

Fire Safety Policies, Fire Statistics, and Fire Log: The college annually provides a report to each student and current employee that discloses campus fire safety policies, fire prevention activity data, and any fire-related incident that occurs with on-campus housing. Additional information is available from the Department of Campus Safety and Security. Prospective students and prospective employees receive a notice of the report’s availability. In addition to the above, the college fire safety policies are published in the Canisius College Policy Manual.

Student Outcomes

Retention Rate: The college provides retention rates for students, which are available on the college website at https://www.canisius.edu/academics/office-academic-affairs/higher-education-opportunity-act-information

Graduation Rates: The college provides graduation rates, which are available on the college website at https://www.canisius.edu/academics/office-academic-affairs/higher-education-opportunity-act-information

Intercollegiate Athletics Graduation Rates: The college reports annually on the graduation rates of students receiving grant-in-aid support for their participation in intercollegiate athletics. The college provides this intercollegiate athletics graduation rates report, which are available on the college website at http://www.canisius.edu/dotAsset/39289b8f-8658-4324-a0e8-a678e2c9e0a9.p

Post Graduate Survey (Placement in Employment, Job Placement, and Graduate and Professional Education): The college gathers data from graduates, such as survey response rates, employment rates, and graduate/professional school attendance rates, that it hopes will be helpful to current and prospective students. This information is available at https://www.canisius.edu/student-experience/student-support-services/griff-center/career-services

Intercollegiate Athletic Program Participation Rates and Financial Support Data:

The Equity in Athletics Disclosure Act requires co-educational institutions of postsecondary education that participate in a Title IV federal student financial assistance program and have an intercollegiate athletic program, to prepare an annual report to the U.S. Department of Education. This report includes information on athletic participation, staffing, and revenues and expenses.

A copy of this report may be requested by contacting the Director of Athletics.

Teacher Preparation Program Report

Teacher Preparation Program Report is available on the college’s website at https://www.canisius.edu/academics/office-academic-affairs/higher-education-opportunity-act-information

Voter Registration

Voter Registration Forms and Voter Registration Information is available on the college’s website at http://www.elections.erie.gov/voter-information/voter-registration-information/

RELATED POLICIES

Not Applicable

6.4.2 Financial Aid Eligibility Policy

<table>
<thead>
<tr>
<th>FINANCIAL AID ELIGIBILITY POLICY</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Effective Date:</strong> May 8, 2017</td>
</tr>
<tr>
<td><strong>Policy Number:</strong> VI – 6.4.2</td>
</tr>
<tr>
<td><strong>Supersedes:</strong> Not Applicable.</td>
</tr>
<tr>
<td><strong>Issuing Authority:</strong> President</td>
</tr>
<tr>
<td><strong>Responsible Officer:</strong> Vice President for Enrollment Management</td>
</tr>
<tr>
<td><strong>Applicability:</strong> All students seeking financial assistance at Canisius College.</td>
</tr>
<tr>
<td><strong>History:</strong></td>
</tr>
</tbody>
</table>
To be considered for student financial aid, a student must:

1. Study at least half-time at an educational institution approved by the federal government. It may be located in New York, in another state, or in a foreign country.
2. Be a U.S. citizen or eligible non-citizen.
3. Be a resident of New York State for 12 months immediately preceding the first term for which the student is applying for aid (for New York State financial aid programs).
4. Be in good academic standing and making satisfactory academic progress.
5. Have no outstanding debt from a previous student loan default and must not owe a refund on any federal grant at any institution.
6. Demonstrate compliance with applicable Selective Service laws.
7. Demonstrate financial need or meet individual program or scholarship requirements.
8. Have never received a drug conviction while receiving aid OR have satisfied federal requirements to reinstate eligibility after a drug conviction.
9. Not be enrolled simultaneously in elementary or secondary school
10. Have a high school diploma or a recognized equivalent;
11. Have a valid Social Security Number, if required;
12. For Title IV funds, sign a Statement of Educational Purpose if requested through the federal verification process, which certifies he or she will use federal student financial aid only to pay educational costs;
13. For Title IV funds, have not obtained loan amounts that exceed annual or aggregate loan limits made under any Title IV loan program;
14. Not have property which is subject to a judgment lien for a debt owed to the U.S. or, if subject to a judgment lien, have made satisfactory repayment arrangements with the debt holder;
15. For Title IV funds, have completed repayment of funds to either the Department of Education or the holder of a loan, as applicable, if the student has been convicted of, or plead nolo contendere or guilty to, a crime involving fraud in obtaining Title IV aid.

The Admissions Office is responsible for certifying upon admission that a student is enrolled in an eligible program and that he or she has a high school diploma or recognized equivalent. When an admitted student files the Free Application for Federal Student Aid (FAFSA) and an Institutional Student Information Record (ISIR) is received by the college, the Student Records & Financial Services Office is responsible for documenting that the student has a valid Social Security Number, is a U.S. citizen, and is registered for Selective Service if required. Upon receipt of an ISIR, the Student Records & Financial Services Office also must verify through the National Student Loan Data System (NSLDS) that a student is not in default on a title IV loan, has not exceeded annual or aggregate loan limits and it not liable for an overpayment of a Title IV grant or loan. The ISIR also indicates whether or not a student has property that is subject to a federal lien whether or not he or she has been convicted of an illegal drug offense and whether or not the student has completed repayment of funds if previously convicted of Title IV fraud.

For eligibility requirement for specific aid programs offered at Canisius College, refer to the current catalogs.

**DEFINITIONS**

Not Applicable.

**PROCEDURES/GUIDELINES**

See the current college catalogs.

**RELATED POLICIES**

Satisfactory Academic Progress Policy
Dismissal Policy
Medical Leave of Absence Policy
Voluntary Leave of Absence Policy
Involuntary Leave of Absence Policy
Repeating a Course Policy
Student Financial Aid
Withdrawal from the College Policy

**6.4.3 Financial Services Program Audit Policy**

<table>
<thead>
<tr>
<th>FINANCIAL SERVICES PROGRAM AUDIT POLICY</th>
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</thead>
<tbody>
<tr>
<td>Effective Date: May 8, 2017</td>
</tr>
<tr>
<td>Policy Number: VI – 6.4.3</td>
</tr>
<tr>
<td>Supersedes: Not Applicable.</td>
</tr>
<tr>
<td>Issuing Authority: Board of Trustees</td>
</tr>
<tr>
<td>Responsible Officer: Vice President for Enrollment Management</td>
</tr>
<tr>
<td>Applicability: Student Records and Financial Services Center Staff.</td>
</tr>
<tr>
<td>History:</td>
</tr>
</tbody>
</table>
PURPOSE

The purpose of the policy is to establish the principles and procedures that govern the annual audit of the college’s compliance with the laws and regulations that are applicable to the Federal Student Aid programs in which the college participates.

POLICY

In compliance with Federal regulations, Canisius College conducts an annual audit of the college’s compliance with the laws and regulations that are applicable to the Federal Student Aid programs in which the college participates.

DEFINITIONS

Not Applicable.

PROCEDURES/GUIDELINES

Federal regulations require a compliance audit every fiscal year. Each audit must cover the time period since the last audit. Canisius College’s fiscal year ends June 30, and is audited annually by a private, independent auditor. Auditors review a sample of student files to ensure the Student Records and Financial Services Center is in compliance with federal, state and college policies. Any exceptions found during the audit will be addressed. The auditor then submits an Independent Auditor’s Report, including any findings, to the college president and the Board of Trustees. The college’s vice president for business and finance then uploads the report to the government using the online submission site of eZ-Audit. Federal reviews are conducted by the United States Department of Education on a basis determined by the department.

Preparation for the audit is done in cooperation with the auditor’s requests. Typically, the auditors will randomly select a specific number of students from each of the Title IV programs. The files are pulled and given to the auditors. Any additional assistance requested is responded to promptly.

RELATED POLICIES

Financial Services Program Audit Policy

6.4.4 Financial Services Program Integrity Policy

<table>
<thead>
<tr>
<th>FINANCIAL SERVICES PROGRAM INTEGRITY POLICY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Effective Date:</td>
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<tr>
<td>Policy Number:</td>
</tr>
<tr>
<td>Supersedes:</td>
</tr>
<tr>
<td>Issuing Authority:</td>
</tr>
<tr>
<td>Responsible Officer:</td>
</tr>
<tr>
<td>Applicability:</td>
</tr>
<tr>
<td>History:</td>
</tr>
</tbody>
</table>

PURPOSE

The purpose of the policy is to establish principles and procedures that ensure that students receiving financial aid have the opportunity to voice concerns relating to Federal Financial Aid programs offered by Canisius College.

POLICY

In compliance with Department of Education Regulation 34 CFR 600.9, the “Program Integrity Rule,” it is the policy of Canisius College to ensure that students receiving financial aid have the opportunity to voice concerns relating to Federal Financial Aid programs offered by Canisius college. The regulations require the opportunity for students to lodge the following types of complaints:

- Allegations of state consumer protection violations, including, but not limited to fraud and false advertising;
- Allegations that state laws or rules addressing the licensure of postsecondary institutions have been violated;
- Allegations regarding the quality of education or other accreditation requirements.

In compliance with Federal Program Integrity Rule, the college provides multiple alternatives for individuals who wish to submit complaints regarding the above. The college expects that any student complaint will initially be filed with the college in accordance with the procedures set forth in the Procedures /Guideline section of this Policy before resolution is sought from a state agency or the college’s accreditation body. In the absence of a procedure, a complaint may be filed with the office of the president for appropriate referral.

DEFINITIONS

Not Applicable.

PROCEDURES/GUIDELINES

Filing a Complaint
Canisius College has adopted a general Student Grievance Policy to address and resolve non-academic questions and concerns of students may have, including questions and concerns relating to the Program Integrity Rule. Refer to the Student Grievance Policy for additional information. Upon receipt of a Program Integrity Complaint, the college summarizes the number and type of complaints received pursuant to the Student Grievance Policy and tracks their resolutions. In addition, any complaints regarding fraud may be reported via the college’s Whistleblower Policy or the Title IV Fraud Policy.

**For Complaints Alleging Consumer Fraud**

**New York Department of State, Division of Consumer Protection** [http://www.dos.ny.gov/consumerprotection/]

The Division of Consumer Protection is committed to regulating industries and protecting consumers who use goods and services from those industries. The State of New York ensures fair competition and the free flow of truthful information in the marketplace. Complaints to the division may be filed at [https://www.dos.ny.gov/consumerprotection/form/complaintform.asp](https://www.dos.ny.gov/consumerprotection/form/complaintform.asp)

**For Complaints Concerning Programs in Fields Leading to Professional Licensure:**

**Office of the Professions**

Professional Education Program Review

Education Building, 2 West

Albany, NY 12234

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**For Complaint to the New York State Education Department:**

New York State Education Department

Office of College and University Evaluation

Education Building

5 North Mezzanine

89 Washington Avenue

Albany, NY 12234

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**For Complaints to the College’s Accreditor:**

Middle States Commission on Higher Education

3624 Market Street

2nd Floor West

Philadelphia, PA 19104

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**For Complaints about State Financial Aid Matters**

For a complaint about state student financial aid matters, persons should contact the Higher Education Services Corporation Center at 1-888-NYS-HESC.

**For Fraud Complaints about Federal Financial Aid Matters**

Contact the Department of Education’s Office of Inspector General (OIG) by calling the toll free number (1-800-MIS-USED)

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**RELATED POLICIES**

- Title IV Fraud Policy
- Student Grievance (Non-Academic) Policy

**6.4.5 Return of Title IV Funds Policy**

<table>
<thead>
<tr>
<th>RETURN OF TITLE IV FUNDS POLICY</th>
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<tbody>
<tr>
<td><strong>Effective Date:</strong> May 8, 2017</td>
</tr>
<tr>
<td><strong>Policy Number:</strong> VI – 6.4.5</td>
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<tr>
<td><strong>Supersedes:</strong> Not Applicable.</td>
</tr>
<tr>
<td><strong>Issuing Authority:</strong> President</td>
</tr>
<tr>
<td><strong>Responsible Officer:</strong> Vice President for Enrollment Management</td>
</tr>
</tbody>
</table>
Applicability: All college students and parents of dependent students receiving federal Title IV financial aid funds.

PURPOSE

The purpose of this Policy is to set forth the college’s policy and procedures for returning federal funds which have been dispersed to an undergraduate student who has withdrawn or stopped attending the college to the Federal Title IV programs in compliance with the regulations of the Department of Education.

POLICY

It is the policy of Canisius College to return federal funds which have been dispersed to an undergraduate student who has withdrawn or stopped attending the college to the Federal Title IV programs in compliance with the regulations of the Department of Education.

DEFINITIONS

Not Applicable.

PROCEDURES/GUIDELINES

In order to be eligible for and retain federal financial aid (Title IV) funds, students must maintain enrollment in classes for the entire semester. Failure to do so results in a recalculation of aid funds and may result in a return of unearned Title IV funds.

If a student leaves the college prior to completing 60% of a payment period or semester, the Student Records and Financial Services Center will recalculate eligibility for Title IV funds. Recalculation is based on the percentage of earned aid using the following Federal Return of Title IV funds formula:

\[
\text{Percentage of payment period or term completed} = \frac{\text{number of days completed up to the withdrawal date}}{\text{total days in the payment period or semester}}.
\]

This percentage is also the percentage of earned aid. Funds are returned to the appropriate federal program based on the percentage of unearned aid using the following formula:

\[
\text{Aid to be returned} = (100\% - \text{percentage of earned aid}) \times \text{total amount of aid that could have been disbursed}.
\]

If a student earned less aid than was disbursed, the college will return a portion of the funds and the student will be required to return a portion of the funds. When Title IV funds are returned, the student borrower may owe a debit balance to the college.

If the student did not receive all of the funds that were earned prior to withdrawing, a post-withdrawal disbursement may be due. If the post-withdrawal disbursement includes loan funds, the student must give permission before the funds can be disbursed. The college may automatically use all or a portion of the post-withdrawal disbursement of grant funds for tuition, fees, and room and board charges. Permission is required to use the post-withdrawal grant disbursement for all other college charges. Students will be notified of post-withdrawal disbursement eligibility within 30 days of the date of withdrawal determination.

The college will return the Title IV funds within 45 days of the date it determines the student withdrew. Title IV funds will be returned to the Department of Education in the following order:

- Unsubsidized Federal Stafford Loan
- Subsidized Federal Stafford Loan
- Federal Parent (PLUS) Loan
- Federal Pell Grant
- Federal Supplemental Opportunity Grant
- Other Title IV Assistance
- Other State
- Private and Institutional Aid
- Student

RELATED POLICIES

Financial Aid Eligibility Policy
Satisfactory Academic Progress Policy
Dismissal Policy
Medical Leave of Absence Policy
Voluntary Leave of Absence Policy
Involuntary Leave of Absence Policy
Repeating a Course Policy
Student Financial Aid
Withdrawal from the College Policy

6.4.6 Satisfactory Academic Progress Policy
SATISFACTORY ACADEMIC PROGRESS POLICY

Effective Date: May 8, 2017
Policy Number: VI – 6.4.6
Supersedes: Not Applicable.
Issuing Authority: President
Responsible Officer: Vice President for Enrollment Management
Applicability: All Canisius College students receiving financial aid.

PURPOSE

The purpose of this policy is to describe the standards of satisfactory academic progress that apply to all federal, state, institutional financial assistance programs and veteran benefits through the U.S. Department of Veterans Affairs available to students, as well as specify procedures for warning students who do not make satisfactory academic progress.

POLICY

It is the policy of Canisius College that all matriculated students at the college receiving financial aid maintain satisfactory academic progress in accordance with the policies and guidelines set forth in the college catalogs. These standards of satisfactory academic progress apply to all federal, state, institutional financial assistance programs and veteran benefits through the U.S. Department of Veterans Affairs. Failure to meet the minimum standards set forth in this Policy may result in a loss of financial aid eligibility.

The Student Records and Financial Services Center evaluates student compliance with satisfactory academic progress every semester. Students on warning status will have their academic progress reviewed at the end of each semester to determine if student is making appropriate progress.

DEFINITIONS

Not Applicable.

PROCEDURES/GUIDELINES

See the Undergraduate and Graduate Catalogs.

RELATED POLICIES

Academic Standing Policy

6.4.7 Student Lending Code of Conduct Policy

STUDENT LENDING CODE OF CONDUCT POLICY

Effective Date: May 8, 2017
Policy Number: VI – 6.4.7
Supersedes: Not Applicable.
Issuing Authority: President
Responsible Officer: Vice President for Enrollment Management
Applicability: All Canisius College trustees, executive officers, administrators, faculty, staff, student employees, students, parents of dependent students, others who act on behalf of the college, and third parties with access to student loans.

PURPOSE

The purpose of this policy is to comply with the code of conduct requirements set forth in the Higher Education Opportunity Act (HEOA). As a participant in federal loan programs, Canisius College is required to have a Student Lending Code of Conduct applicable to the institution’s officers, employees, and agents. The Student Lending Code of Conduct is a requirement specific to certain transactions and activities related to student financial aid matters. In addition, the law includes requirements related to publication of the code and annual disclosures.
In compliance with the HEA and the Student Lending, Accountability, Transparency, and Enforcement (SLATE) Act, Canisius College has adopted a Student Lending Code of Conduct with which the college’s officers, employees, and agents shall comply. The college’s code prohibits a conflict of interest with the responsibilities of an officer, employee, or agent of the college with respect to federal loan programs, and includes provisions related to such conflicts. In compliance with the HEA, the code will be displayed prominently on the college’s website and all college officers, employees, and agents with responsibilities related to federal loan programs will be annually informed of the provisions of the code.

DEFINITIONS
See Procedures/Guidelines for applicable definitions.

PROCEDURES/GUIDELINES

Ban on Revenue-Sharing Arrangements

(A) Prohibition -- The college shall not enter into any revenue-sharing arrangement with any lender.

(B) Definition -- For purposes of this paragraph, the term ‘revenue-sharing arrangement’ means an arrangement between an institution and a lender under which --

(i) a lender provides or issues a loan that is made, insured, or guaranteed under this title to students attending the institution or to the families of such students; and

(ii) the institution recommends the lender or the loan products of the lender and in exchange, the lender pays a fee or provides other material benefits, including revenue or profit sharing, to the college, an officer or employee of the institution, or an agent.

Gift Ban

(A) Prohibition -- No officer or employee of the college who is employed in the Student Records & Financial Services Office, or an individual who has been assigned by the Canisius college president with supervisory authority over the Director of Financial Aid, or who otherwise has responsibilities with respect to education loans, or agent who has responsibilities with respect to education loans, shall solicit or accept any gift from a lender, guarantor, or servicer of education loans.

(B) DEFINITION OF GIFT

(i) In General -- In this paragraph, the term ‘gift’ means any gratuity, favor, discount, entertainment, hospitality, loan, stock, or other item having a monetary value of more than a de minimus amount ($25 per year). The term includes a gift of services, transportation, lodging, or meals, whether provided in kind, by purchase of a ticket, computer hardware, printing costs or services for which the recipient pays below-market value, payment in advance, or reimbursement after the expense has been incurred.

(ii) Exceptions -- The term ‘gift’ shall not include any of the following:

(I) Standard material, activities, or programs on issues related to a loan, default aversion, default prevention, or financial literacy, such as a brochure, a workshop, or training.

(II) Food, refreshments, training, or informational material furnished to an officer or employee of the college, or to an agent, as an integral part of a training session that is designed to improve the service of a lender, guarantor, or servicer of education loans to the college, if such training contributes to the professional development of the officer, employee, or agent. Reimbursement of expenses to a covered college employee for serving on the board of bona-fide professional association recognized by the Commissioner of NYS Education Dept., related to student financial aid.

(III) Favorable terms, conditions, and borrower benefits on an education loan provided to a student employed by the college if such terms, conditions, or benefits are comparable to those provided to all students of the college.

(IV) Entrance and exit counseling services provided to borrowers to meet the college’s responsibilities for entrance and exit counseling as required by subsections (b) and (f) of section 485, as long as --

(aa) the college’s staff are in control of the counseling, (whether in person or via electronic capabilities); and

(bb) such counseling does not promote the products or services of any specific lender.

(V) Philanthropic contributions to the college from a lender, servicer, or guarantor of education loans that are unrelated to education loans or any contribution from any lender, guarantor, or servicer that is not made in exchange for any advantage related to education loans.

(VI) State education grants, scholarships, or financial aid funds administered by or on behalf of a State.

(iii) Rule for Gifts for Family Members -- For purposes of this paragraph, a gift to a family member of an officer or employee of the college, to a family member of an agent, or to any other individual based on that individual’s relationship with the officer, employee, or agent, shall be considered a gift to the officer, employee, or agent if --

(I) the gift is given with the knowledge and acquiescence of the officer, employee, or agent; and

(II) the officer, employee, or agent has reason to believe the gift was given because of the official position of the officer, employee, or agent.

Contracting Arrangements Prohibited

(A) Prohibition -- An officer or employee who is employed in the Student Records & Financial Services Office or who otherwise has responsibilities with respect to education loans, or an agent who has responsibilities with respect to education loans, shall not accept from any lender or affiliate of any lender any fee, payment, or other financial benefit (including the opportunity to purchase stock) as compensation for any type of consulting arrangement or other contract to provide services to a lender or on behalf of a lender relating to education loans.
(B) Exceptions -- Nothing in this subsection shall be construed as prohibiting --

(i) an officer or employee of the college who is not employed in the Student Records & Financial Services Office and who does not otherwise have responsibilities with respect to education loans, or an agent who does not have responsibilities with respect to education loans, from performing paid or unpaid service on a board of directors of a lender, guarantor, or servicer of education loans;

(ii) an officer or employee of the college who is not employed in the Student Records & Financial Services Office but who has responsibility with respect to education loans as a result of a position held at the college, or an agent who has responsibility with respect to education loans, from performing paid or unpaid service on a board of directors of a lender, guarantor, or servicer of education loans, if the college has a written conflict of interest policy that clearly sets forth that officers, employees, or agents must excuse themselves from participating in any decision of the board regarding education loans at the college; or

(iii) an officer, employee, or contractor of a lender, guarantor, or servicer of education loans from serving on a board of directors, or serving as a trustee, of the college, if the college has an interest policy that the trustee must excuse themselves from any education loans at the college.

*Note: Where New York State law under the SLATE Act is stricter than federal law, inserts are in bold.

Other Provisions:

- The college recognizes that a borrower has the right to choose any lender from which to borrow to finance his/her education. The college will not refuse to certify or otherwise deny or delay certification of a loan based on the borrower’s selection of a lender and/or guarantor;
- The college will not request or accept any offer of funds to be used for private education loans to students from any lender in exchange for providing the lender with a specified number or volume of Title IV loans, or a preferred lender arrangement for Title IV loans;
- The college will not request or accept any assistance with call center or Student Records & Financial Services Office staffing from an outside lender;
- Students working in the Student Records & Financial Services Office must not in any way process, award, or certify their own or any relative or associate’s application for financial aid. Records (both electronic and hard copy) that need to be updated in relation to student’s financial aid application are not to be updated or altered in any way by a student employee assigned to the Student Records & Financial Services Office. Student employees may, however, accept favorable terms, conditions, and borrower benefits on an education loan if the terms, conditions, and benefits on the employee’s loan are comparable to those provided to all of the college’s students.
- Student Records & Financial Services Office officers, employees or agents assigned to work on loan processing matters may not be debarred or suspended by a federal agency. Any staff member that has been found to be suspended or debarred by a federal agency is subject to a range of administrative actions to include termination of employment.
- The college will not permit a lender or guarantor to print and distribute the college’s catalogs and other non-counseling or non-student financial aid-related materials at reduced or no cost. Moreover, the college will not permit a lender with whom it has a preferred lender arrangement for private education loans to use the college name, emblem, mascot, logo, other words, pictures or symbols readily identified with the college in the marketing of private education loans to students or parents in a way that implies that the loan is offered or made by the college instead of the lender. The college will ensure that the name of the lender is displayed on all information and documentation relating to the lender’s private education loans;
- The college will not accept from a Federal Family Education Loan Program (FFELP) or private lender, lender servicer, or guarantor, computer hardware or computer software at below market rental or purchase cost that is unrelated to education loan processing or financial aid. In addition, the college will not accept free data transmission services from a FFELP lender or guarantor that is unrelated to electronic loan processing or, for FFELP loans, student status confirmation data.

Violations of college policies, including the failure to avoid a prohibited activity or disclose a conflict of interest in timely manner, will be dealt with in accordance with applicable college policies and procedures, which may include disciplinary actions up to and including termination from the college.

**RELATED POLICIES**

- Community Standards
- Standards of Ethical Conduct
- Whistleblower Policy
- Credit Card Marketing Policy
- Classification as a Gift or Grant Policy
- Fundraising and Gift Acceptance Policy
- Alumni Solicitations Policy

**6.4.8 Title IV Fraud Policy**

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<thead>
<tr>
<th>TITLE IV FRAUD POLICY</th>
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<tr>
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<td>Policy Number:</td>
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<td>Supersedes:</td>
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<td>Issuing Authority:</td>
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<td>Responsible Officer:</td>
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PURPOSE

The purpose of this policy is to set forth the college policies, procedures and guidelines for addressing suspected Title IV fraud.

POLICY

It is the policy of Canisius College that if the Student Records and Financial Services Center or any college personnel suspects that a student, employee, or other individual has misreported information and/or altered documentation to increase student aid eligibility or to fraudulently obtain federal funds (i.e. identity theft), it must report those suspicions and provide any evidence to the Department of Education’s Office of Inspector General (OIG).

DEFINITIONS

Not Applicable.

PROCEDURES/GUIDELINES

Federal regulations require that the college refer applicants who are suspected of having engaged in fraud or other criminal misconduct in connection with the Title IV programs to the Department of Education’s Office of Inspector General (OIG). The regulations require only that the college refer the suspected case for investigation, not that it reach a firm conclusion about the propriety of the applicant’s conduct.

Examples of Title IV fraud include:

- Falsified documents or forged signatures on an application, verification documents, or loan promissory notes;
- False statements of income;
- False statements of citizenship;
- Use of false or fictitious names or aliases, addresses, or Social Security Numbers;
- False claims of independent status.

If Canisius College suspects that a student, employee, third-party servicer or other individual has misreported information and/or altered documentation to increase student aid eligibility or to fraudulently obtain federal funds, it will report those suspicions and provide any evidence to the Department of Education’s Office of Inspector General (OIG) by calling the toll free number (1-800-MIS-USED) or sending an email message to the OIG. The director of financial aid is responsible for making referrals to the OIG. In addition, Canisius College will pursue appropriate disciplinary action against college students or employees engaging in conduct that violates this policy.

Note: If the director of financial aid is suspected in any fraudulent behavior, members of the college community may make a report directly to the OIG or report the matter to the college via the college Whistleblower Policy.

RELATED POLICIES

Community Standards
Consumer Information Policy
Financial Aid Eligibility Policy
Student Lending Code of Conduct Policy
Return of Title IV Funds Policy
Standards of Ethical Conduct
Whistleblower Policy

6.4.9 Verification Policy

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<th>EFFECTIVE POLICY</th>
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<td><strong>Responsible Officer:</strong></td>
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<td><strong>Applicability:</strong></td>
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<td><strong>History:</strong></td>
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The purpose of this policy is to set forth guidelines and procedures to comply with the U.S. Department of Education requirement that Canisius College verify reported information on the Free Application for Federal Financial Aid (FAFSA) form for federal student aid applicants selected for verification by the department.

**POLICY**

In compliance with CFR 668, Subpart E, Canisius College will verify all federal student aid applicants whose applications have been selected for verification by the U.S. Department of Education in accordance with the procedures and policy guidelines set forth below.

**DEFINITIONS**

Not Applicable.

**PROCEDURES/GUIDELINES**

The Student Records and Financial Services Center is required to request certain documents from students selected for verification in order to verify that the information supplied on the FAFSA form was correct. “Verification” selections are made by the FAFSA processing center based on criteria determined by the U.S. Department of Education.

New students who are selected for verification will be notified by the Student Records and Financial Services Center in writing in a letter which lists all documents that have been requested. Returning students selected for verification will be notified by email with the list of documents that have been requested. This information is also posted on the new and returning students’ MyCanisius account. Students whose award has changed due to verification will be notified via email indicating the changes to each and any award.

Students are responsible for submitting all required verification items by the established deadline included in the letter sent to the student. Failure to submit required documents by the deadline may forfeit Federal Financial Aid eligibility.

A student selected for verification will be asked to submit copies of his/her own and, if appropriate, his/her parents’ transcript, together with all schedules and forms mailed to the IRS. Information about other factors including household size, assets, and the number of family members in college may also be requested.

The verification process is intended to establish an accurate baseline award package for each student and reduce the amount of documentation a student will be asked to submit in subsequent years. However, tax transcripts or other documents may be required for renewal applicants if their application information appears to be inconsistent with that of the previous year(s). If verification documents are requested, the student must submit all requested documentation three weeks prior to the end of the academic term in which the student is planning to receive aid.

The college Student Records and Financial Services Center may not process requests for professional judgment or disburse federal student aid until the verification process is complete.

Financial aid administrators have the right to ask for any documentation they feel is necessary to complete verification. If the student or student’s family refuses to supply this documentation, the college will not disburse federal student aid to the student.

**RELATED POLICIES**

Not Applicable.

6.4.10 Veteran’s Benefits Policy

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<th>VETERAN’S BENEFIT POLICY</th>
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**PURPOSE**

The purpose of this policy is to establish guidelines for all students seeking to receive education benefits from the United States Department of Veterans Affairs.

**POLICY**
Some armed service veterans and their dependents are eligible to receive educational benefits from the United States Department of Veterans Affairs. The application for VA Education Benefits or survivors’ and dependents’ Educational Assistance is available on-line. Individuals seeking Educational Benefits may complete an on-line application at http://vabenefits.vba.va.gov/vonapp/main.asp or download a paper application at https://www.vba.va.gov/pubs/forms/vba-22-1990-are.pdf. The completed paper application and enrollment certification will be sent to the Department of Veterans Affairs. Subsequent certifications will be processed by the Student Records & Financial Services on notification from the student of his/her intention to re-enroll. Any questions or comments regarding VA benefits should be directed to Student Records & Financial Services.

Students who receive VA benefits and who are placed on academic probation will be required to achieve a 2.0 cumulative GPA during the subsequent grading period. Failure to do so will result in the termination of VA monetary educational benefits. This action will not result in dismissal if the student has met the requirements for Satisfactory Academic Progress.

DEFINITIONS

Not Applicable.

PROCEDURES/GUIDELINES

A student using VA benefits must adhere to the policy guidelines:

1. It is the student’s responsibility to notify Student Records & Financial Services immediately when the student increases or decreases semester credit hours taken, when the student withdraws from a course, or when the student takes a leave of absence. It is also the student’s responsibility to inform Student Records & Financial Services every semester as to the number of semester credit hours for which he or she enrolls.

2. The student is responsible for paying the tuition fee. Students receive a monthly entitlement based on the number of credit hours they are pursuing each semester. This entitlement may not necessarily cover the cost of tuition and fees. It usually takes six to eight weeks from the time a student’s papers are processed by Student Records & Financial Services until a check is received.

3. Appropriate credit for previous education will be awarded. A maximum of four (4) semester hours of credit may be awarded for military service (two semester hours for basic training and two semester hours for first aid).

A student using VA benefits must make satisfactory academic progress. In general, unsatisfactory progress for veterans benefits is considered attainment of less than a 2.0 grade point average for two consecutive semesters. A student who withdraws from college may have his/her benefits terminated as of the beginning of the semester of withdrawal. If a student is dismissed for academic reasons, benefits will be terminated as of the date of dismissal. A student who has had benefits terminated in this manner must be counseled by Student Records & Financial Services before the benefits will be restored. A student who fails to complete all courses attempted in a semester will have his/her benefits adjusted accordingly.

RELATED POLICIES

Satisfactory Academic Progress Policy