



Title IV Policy and Procedure Manual

2023/2024

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About this Manual

This manual contains policies and procedures for managing Mauna Loa Helicopters Federal Student Aid program. It was developed using recommendations from the Department of Education's Federal Aid Administration's assessment tools.

Maintaining Title IV Policies and Procedures

Mauna Loa Helicopters Financial Aid Department and the President develops and maintains the MLH Title IV Policy and Procedure Manual using a semi-annual review process. This process reviews the entire manual for currency and makes updates and/or corrections as needed. When a correction is needed outside of the regularly scheduled review, it will be brought up during staff meetings. All staff will have an opportunity to participate. The President and any relevant departments may meet future to discuss the changes/corrections. The Financial Aid Department collaborates with the Marketing Department to ensure required changes are made to the Policy and Procedure Manual, the Mauna Loa Helicopter website and student catalog.

Title IV Checks and Balances, Staffing Policy

Policy

The procedures for the awarding and disbursing of federal student aid have been divided into three branches: Financial Aid, Business Office, and MLH's Third Party Servicers, Campus Ivy. All other departments within MLH are responsible for conveying information that may impact upon student aid eligibility to the Financial Aid Department.

- + The CEO, COO, and CFO have an annual staff meeting to discuss policy updates, department agendas, student concerns, and department requests.
- + Student liaison, Chief Pilot, and COO meet monthly to discuss student progress. Student progress is kept electronically in "Student Tracking" within a Google Document available to management departments.
- + CEO, COO, DO, and Chief pilots have annual mandatory Faculty meetings to update the faculty on the policy and or procedure changes.

Procedure:

MLH ensures that there are adequate checks and balances, and staffing, to meet the Department of Education's requirements for institutional eligibility and administrative capacity.

The Student Liaison is responsible for tracking, admissions information, enrollment, leave of absence, hours attempted and completed, withdrawals and drops, and Satisfactory Academic Progress. The student liaison is responsible for informing the Financial Aid Department of any changes that may impact student eligibility. Also tracks student engagements, unofficial/official withdrawal, and progress.

The Financial Aid Department oversees awarding federal student aid to eligible students. It is the duty of this department to verify that the student qualifies for financial aid, and both advise and award the student properly based on the student's FAFSA information, enrollment record, and verification information.

The Business Office maintains strict records that comply with the standards of the Department of Education. The Business Office receives the Award Journals from Campus Ivy which outlines the funds directly deposited into the Federal Fund bank account from Campus Ivy/Department of Education. The business Office requests confirmation from the President/CEO that funds have been deposited into the Federal Funds Account. The Business Office uses the Award Journal to post Title IV funds to student accounts. Once those funds are posted, the Business gives the CEO and CFO the journal to transfer the funds from the Federal Funds account to the Main operating account. The funds transferred from the Federal Funds account to that account within 1-2 business days after receipt of funds. Each month, the CFO also submits the required bank statements from the Federal Title IV bank account to the financial analyst/account and Campus Ivy for reconciliation. The Business Office in cooperation with the Financial Aid Office reconciles the Federal Funds bank statements and the Award Journals showing received Title IV funds on a monthly basis.

Mauna Loa Helicopters' Third-Party Servicer, Campus Ivy downloads the ISIR records, reviews MLH student requested/approved federal aid, send originations and disbursements through COD, reconciles Direct Loans, Sub/Unsub loans, confirms MPNs, Entrance Counseling, Exit Counseling and draws down the funds in G5.

General Division of Responsibilities	Person Responsible	Required Date
Financial Aid Department /MLH notifies all current students to file the FAFSA on October 1 st of each year with instructions including the tax year used on the FAFSA.	Financial Aid Department and the Marketing Department	10/01
Financial Aid Department will follow up with student if necessary and request further documentation for verification as needed.	Financial Aid Department	As needed
The Financial Aid Department inputs the student's award package into Campus Ivy software. Campus Ivy verifies all information and reviews. Up to 10 days before classes start Financial Aid Department approves funds in Campus IVY.	Financial Aid Department	As needed
Campus Ivy will review the request/approved aid for errors. Campus Ivy then sends origination and disbursements to COD and draws down funds from G5.	Campus Ivy	After student's award package are in the system
Campus Ivy deposit from G5 into MLH Bank Account and notifies the CFO providing a Daily Journal.	Campus Ivy/CFO	As Needed
CFO creates a tracking sheet for each student on which monies are disbursed in the order of fees.	CFO	When funds are received in MLH Federal account.
CFO records funds on student account, notifies student of disbursement and enters in QuickBooks	CFO	The day funds are received into MLH federal bank account
CFO produces overage check and checks are made available to students.	CFO	After discussion with student

Institutional Title IV Eligibility

Basic criteria to be an eligible institution to participate in Federal Student Aid, a school must:

- + Be legally authorized by the state to provide a postsecondary education program in that state.
- + Be accredited by a nationally recognized accrediting agency or have met the alternative requirements, if applicable, and
- + Admit as regular students only individuals with a high school diploma or its recognized equivalent or individual beyond the age of compulsory school attendance in the state where the institution is located.

Mauna Loa Helicopters meets all the above criteria.

- + The President ensures that Mauna Loa Helicopters is legally authorized to provide postsecondary program in the state of Hawaii.
- + Mauna Loa Helicopters is accredited by the Accrediting Commission of Career Schools and Colleges (ACCSC)
- + Our admissions process only enrolls individuals with a high school diploma or its recognized equivalent.

The Financial Aid Department in cooperation with the COO is responsible for submitting a timely and complete Eligibility and Certification Approval Report (ECAR) to the Department of Education (ED) at the time of recertification or for reporting changes updates. This department is also responsible for coordinating the responses from ED regarding any reported changes that affect the institution's eligibility, and for meeting any reporting timelines established by ED with regards to the ECAR.

The Financial Aid Department, the CEO, and the Third-Party Servicer, are also responsible for ensuring that ED approved programs meet minimum standards for the Title IV purposes.

Procedure

Mauna Loa Helicopters saves a copy of its E-App (with date submitted) and all supporting documentation electronically in the MLH Drive.

The signed Program participation Agreement Form (PPA), E-App and ECAR are printed and kept in the CFO and COO office.

Student Title IV Eligibility

Policy

To be eligible for Federal Student Aid (FSA) funds, all students must meet minimum requirements established by the Department of Education. Mauna Loa Helicopters ensures eligibility requirements are met before awarding and disbursement of FSA funds.

All students qualifying for Title IV Aid must:

- + have completed and approved Free Application for Federal Student Aid (FAFSA) on file with Mauna Loa Helicopters
- + be enrolled as a regular student in an eligible program per the current ECAR.
- + not be enrolled simultaneously in elementary or secondary school.
- + have a high school diploma or its recognized equivalent (e.g., a GED).
- + have a valid Social Security Number with the Social Security Administration
- + be a U.S. citizen or eligible noncitizen.
- + be making satisfactory progress (SAP).
- + not be in Default on federal loans.
- + have not exceeded Loan Eligibility.
- + be 23 years or younger and dependent on parent taxes.

Note: This list contains general eligibility factors only.

Procedure

The Financial Aid Office uses the above criteria to review each student file and awards aid based on 500 credit hours. Twelve hours per week are considered full time for Title IV purposes. The student liaison is responsible for monitoring the scheduled training hours. Financial Aid is notified of any reduced credit hour and adjusts aid accordingly as needed. A student's initial award will be disbursed at the start of their training.

The student will receive a second disbursement of their initial award upon the completion of the initial 250 hours.

Cost of Attendance

Policy

The Higher Education Act (HEA) of 1965 defines the costs of attendance (COA) components of all Title IV programs. These components have both direct and indirect expenses that are considered when a student attends college. The HEA specifies that components to be included. The COA must be used in determining a student's eligibility for Title IV financial aid funding. The policy requires a school periodically review and update the COAs if necessary. The components of the budget determinations must be fully documented and appropriate.

Procedure

Each aid year in the month of December, the CEO and COO will review the COAs and update the appropriate components. Any adjustment is based on predicted cost or cost increases (tuition, fees, books, supplies, room and board, transportation, misc. personal expenses.)

The COAs will be based on 500-hour training program. The COAs will represent a modest budget by which a student can reasonably live while attending Mauna Loa Helicopters. The COAs are provided to Campus Ivy (Third Party Servicer)/ Components to the COA can only be altered for the Professional Pilot Program through a Professional Judgment.

Financial Aid Advising

Policy

The Financial Aid Department is responsible for providing financial aid advising. This policy is intended to describe the various means Mauna Loa Helicopters uses to inform students of their rights and responsibilities with regards to federal student aid funding.

Procedure

- + Students are informed of their financial aid opportunities and options either in person or by phone for both incoming new students and continuing students.
- + Advising is generally by appointment but can happen by drop in/on demand as well.

Written Guidance

- + New and continuing students must accept what aid they choose and sign their financial aid offer which also included terms and conditions of the aid.
- + The student catalog (which is emailed to each individual student and posted on our website): contains general information about the financial aid program, including how to apply, costs, relevant policies, and procedures (ex: Satisfactory Academic Progress).

Verification

Policy

Student ISIRS may be selected for verification by the Department of Education or by Mauna Loa Helicopters. Applications are not considered complete, financial aid offer letters will not be prepared and federal aid will not be disbursed, until verification is completed. Therefore, any financial aid is based on the post verification approved EFC.

Procedure

1. Mauna Loa Helicopters Financial Aid Department reviews all ISIRs.
 - New students: ISIR review occurs after students are accepted into the program and are officially enrolled.
 - Continuing students: ISIR review occurs when a student is eligible for the next payment period that falls under the new ISIR.
2. Mauna Loa Helicopters Financial Aid notifies students by email if they have been selected for verification.
3. Once all required documents are received, Mauna Loa Helicopters Financial Aid Office completes the Verification.

If additional follow-up is needed, Mauna Loa Helicopters will contact the student by email until the application is considered complete. When Title IV Ais is requested/approved in Campus Ivy, the Mauna Loa Helicopters Financial Aid Office documents in Campus Ivy that Verification is complete.

Professional Judgement

Policy

Professional Judgement (PJs) may be made in limited, unusual circumstances on a individual case-by-case basis and would not include students identified as a “group.” The Financial Aid Administration are eligible to make PJ decisions. The Financial Aid Department is responsible for maintaining documentation for all requests and decisions, regardless of the outcome.

Mauna Loa Helicopters will complete verification on the student’s ISIR prior to implementation professional judgment request. This does not apply to a Dependency Override.

Mauna Loa Helicopters will resolve all Conflicting Information prior to reviewing a professional judgment request.

Mauna Loa Helicopters will use guidance by the Department of Education in reviewing PJ requests and will never use PJs to intentionally circumvent the law of regulations.

Procedure

To request a professional judgement, students must contact the Financial Aid Office.

General Awarding, Packaging and Disbursing

Policy

Mauna Loa Helicopters utilizes third party Campus Ivy to package aid in accordance with federal regulations and guidance published in the Federal Student Aid Handbook. Mauna Loa Helicopters will not award Title IV aid until Verification is completed, Conflicting information is resolved, and we have a clean/approved ISIR.

Procedure

When a student applies to Mauna Loa Helicopter, the school is informed if the student is going to be requesting Title IV funding. Once confirmed, the student wishes to apply for Title IV financial aid Mauna Loa Helicopters monitors students ISIR in Campus Ivy.

Campus Ivy keeps records of Entrance Counseling and MPNs. Federal funds are requested/approved through Campus Ivy up to 10 days prior to the start date in order for the funds to arrive on their first day of classes.

After funds are requested/approved in Campus Ivy, Campus Ivy reviews for errors and works with Mauna Loa Helicopters to correct errors. Campus Ivy processes all origination and disbursement records through COD. Campus Ivy draws down the funds from G5 into Mauna Loa Helicopters Federal Bank Account.

Campus Ivy creates a Daily Journal report showing what is drawn down and deposited from G5 and is sent to the Business Office. Report includes name, social security number, aid type and net amount disbursed. The Business Office uses the Daily Journal report to post funds to student ledgers.

Posting Process

Campus Ivy

Daily, Campus Ivy transmits disbursement information received from its client school to the COD. After the disbursement information is received back the next day from the COD, Campus Ivy draws down the funds from G5 and sends a disbursement notification, known as the Daily Award Journal to the Business Office. The school uses the date of the disbursement notification as the posting date on the student's account ledger and posts the funds within two days or receipt. Since the disbursement information is sent to COD prior to posting this disbursement to the student's account ledger, the process is in compliance with the 15-day rule.

Mauna Loa Helicopters

Mauna Loa Helicopters ensures student ledger accounts accurately record all of the student's fiscal activity. In the posting function, Mauna Loa Helicopters receives the Daily Award Journal from Campus Ivy and begins processing funds in the Student Information System (SIS, her after) based on the batches listed in the award journal. Mauna Loa Helicopters will ensure that the Daily Award Journal matches the SIS and the Financial Aid Roster before funds can be posted. When processing each batch, Mauna Loa Helicopters prints a batch report from the SIS that provides the student names, the amount of funds posted, and the fund source and again checks to ensure both the Award Journal and the SIS match. In addition, cash payments, scholarships, and any other funds received are posted to the student's account ledger in chronological order as individuals' entries with a running account balance.

National Student Loan Sata System - NSLDS

NSLDS (National Student Loan Data System) is accessed only by Mauna Loa Helicopters Management and IPEDS Keyholder for school reporting purposes. NSLDS is a centralized, integrated view of a student's Pell Grants and Title IV loan history. They are tracked from the first approval through closure. NSLDS information is also used and provided to the student for both Entrance and Exit Counseling.

Students can view their personal NSLDS information by logging into studentaid.gov. Their profile will provide personalized information such as federal student loan balance, disbursement dates and loan servicer contact information.

Attendance Verification

Policy

MLH is an attendance tracking school.

Procedure

Students must sign an attendance roster as proof of attendance. Attendance is also tracked in our myFBO system online. Each weeks students are emailed is "at risk" or not meeting attendance requirements.

Satisfactory Academic Progress

Policy

Please see Mauna Loa Helicopters Student Catalog or digital version on the school website.

Procedure

COO manages SAP. Notification to the Financial Aid of any student that is dismissed because of SAP. Financial Aid would then start Exit Counseling (Withdrawing at the end of students training) for that student.

Utilizing the SAP policy, COO and Chief Pilot will evaluate if the student is in good standing with flight hours earned. Those who fall below the requirements listed on the SAP policy (too low required percentage of credit hours) will be placed on academic warning. The COO will send the student an email notification of the academic warning. The email will state which criteria they did not meet which caused them to be placed on academic warning. The student is required to meet with the COO and Chief Pilot to sign a new academic plan. The plan will help the student understand what training they will need to earn during their warning period to be placed back on satisfactory progress.

The COO and Chief Pilot will reevaluate the students credit hours at the end of the students warning period. If the student has reached the criteria as noted in the SAP policy, they will be placed in satisfactory academic standing. The COO will notify the student their new status via email. If the student does not meet the criteria set in the SAP policy they will be academically dismissed and withdrawn. The COO will notify the student of their new status via email.

Entrance Counseling and Mast Promissory Note

Policy

It is a requirement by the Department of Education that any student that will receive federal loans must complete Federal Entrance Counseling (and the Master Promissory Note) before the first disbursement of a federal loan. MLH's third party services conducts, tracks, and houses these requirements.

Procedure

MLH's third party services conducts, tracks, and houses these requirements.

Exit Counseling

Policy

Exit Counseling is required by the Department of Education that any student that has received federal loans and graduates, drops below half time, withdraws, or does not return must complete Exit Counseling. Federal Counseling provided information to the students to prepare them to repay their federal loan(s).

Procedure

MLH's third party services conducts, tracks, and houses these requirements.

Leave of Absence

Policy

In the event that a financial aid recipient needs to take a Leave of Absence (LOA), the student and school must comply with the following:

All students: Formally request an LOA,

- a) Inform Student Liaison, and Instructor with written LOA Form.
- b) COO and Chief Pilot must review.

The following are acceptable reasons for a LOA: military, jury duty, loss of job, family emergency or other reasons which demonstrate the student's circumstance.

Please note that your LOA may not exceed 180 days. If your LOA exceeds 180 days. MLH will consider the student as having permanently withdrawn and will apply its refund policy. LOA will be issued in accordance with the MLH policies in the student handbook.

Withdrawing: Treatment of Title IV Aid When a Student Withdraws

Official Withdrawal: A student may officially withdraw by contacting the Student Liaison about their intention to withdraw. The official withdrawal date will be the date the student made contact the Student Liaison. If the student was unable to contact the Student Liaison due to an extenuating circumstance such as a car accident, the withdrawal date will be the date the extenuating circumstance occurred.

Administrative Withdrawal: A student will issue an administrative withdrawal if the student fails to begin attendance within the add/drop period of the orientation date set on their acceptance letter. The student is considered a withdrawal for Title IV purposes, and the school will consider the school determine withdrawal date the last day of the add/drop period.

Unofficial Withdrawal: Guided by MLH's Academic Progress Policy, an unresponsive student will be given four weeks to respond to an Academic Probation email. The student must respond with a letter intent to return. If no response the student will be considered an unofficial withdrawal for Title IV purposes. The school determined withdrawal date will be the last day of academically related activity.

Note: Mauna Loa Helicopters will use the Return of Title IV Funds Policy for students who withdraw from school and who are receiving Federal Title IV student financial aid. Title IV funds refer to federal financial aid programs authorized under the Higher Education Act of 1965 (as amended). When a student withdraws during a payment period, the amount of Title IV program assistance that a student has earned up to that point is determined by a specific formula. If a student received less assistance than the amount that the student earned, the student may be able to receive those additional funds. If the student receives more assistance than earned, the school and/or student must return the excess funds.

A student may choose to decline some or all of the loan funds so that the student does not incur additional debut. The school will return the funds for the student.

Penalties for Drug Law Violations

A federal or state drug conviction can disqualify a student from Federal Student Aid funds if the conviction was for an offense that occurred during a period of enrollment for which the student was receiving Title IV aid. Length of ineligibility varies based upon whether the conviction was for a first or subsequent offense. If eligibility is lost, you will be notified as to the steps you can take to reestablish eligibility.

For more information, please visit our consumer information webpage.