



October 18, 2012

Dr. Ervin V. Griffin
President
Halifax Community College
200 College Dr.
Weldon, NC 27890-0089

UPS Tracking: 1ZA5467Y0192497312

Re: Final Program Review Determination

OPE ID Number: 00798600

PRCN Number: 201230427920

Dear Dr. Griffin:

The U.S. Department of Education's (Department's) School Participation Division - Atlanta issued a program review report on July 3, 2012 covering Halifax Community College's (HCC's) administration of programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 *et seq.* (Title IV, HEA programs), for the 2010/2011 and 2011/2012 award years. The institution's final response was received on August 1, 2012.

The School Participation Division - Atlanta has reviewed HCC's response to the Program Review Report. A copy of the program review report (and related attachments) and HCC's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by HCC upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

HCC's responses have resolved all findings. In addition, HCC has provided assurances that the appropriate corrective actions have been taken to resolve and prevent future occurrences of all findings. Therefore, HCC may consider the program review closed with no further action required.

Federal Student Aid

AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

Federal Student Aid, School Participation Division
61 Forsyth Street, SW Room 18T40
Atlanta, GA 30303
www.StudentAid.gov

Halifax Community College
OPE ID 00798600
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Program records relating to the period covered by this program review must be retained until the later of: the resolution of the loan(s) claim(s) or expenditure(s) questioned in the program review [34 C.F.R. § 668.24(e) (3)(i)] or the end of the retention period applicable to the record [34 C.F.R. § 668.24(e)(1) and (e)(2)].

If you have any questions please call Lynette Davis at 770-974-9289.

Sincerely,

(b)(6); (b)(7)(C); (b)(7)(C)

Charles Engstrom
Director

Enclosure: Program Review Report (with attachments)

cc: cc: Ms. Tara I. Keeter, Financial Aid Administrator
State Authorizing Agency: North Carolina Community College System
Accrediting Agency: Southern Association of Colleges and Schools



FILE COPY

July 3, 2012

Dr. Ervin V. Griffin
President
Halifax Community College
200 College Dr.
Weldon, NC 27890-0089

UPS Tracking: 1ZA5467Y0192866628

Re: Program Review Report
OPE ID Number: 00798600
PRCN Number: 201230427920

Dear Dr. Griffin:

From June 4, 2012 through June 8, 2012, Ms. Lynette Davis, Ms. Deoin Thorpe and Mr. Robert Scott as representatives of the U.S. Department of Education conducted a review of Halifax Community College's (HCC's) administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). The findings of that review are presented in the enclosed report.

Findings of noncompliance are referenced to the applicable statutes and regulations and specify the action required to comply with the statute and regulations. Please review the report and respond to each finding, indicating the corrective actions taken by HCC. The response should include a brief, written narrative for each finding that clearly states HCC's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, HCC must provide supporting documentation as required in each finding.

Please note that pursuant to HEA section 498A (b), the Department is required to:

- (1) provide to the institution an adequate opportunity to review and respond to any preliminary program review report¹ and relevant materials related to the report before any final program review report is issued;

¹ A "preliminary" program review report is the program review report. The Department's final program review report is the Final Program Review Determination (FPRD).

Federal Student Aid, School Participation Division
61 Forsyth Street, SW Room 18T40
Atlanta, GA 30303

FEDERAL STUDENT AID ■■■ START HERE. GO FURTHER.

- (2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination –
 - a. A written statement addressing the institution's response;
 - b. A written statement of the basis for such report or determination; and
 - c. A copy of the institution's response

The Department considers the institution's response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution's written response will not be attached to the FPRD. However, it will be retained and available for inspection for HCC upon request. Copies of the program review report, the institution's response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after the FPRD is issued.

The institution's response should be sent directly to Lynette Davis of this office within 30 calendar days of receipt of this letter.

Protection of Personally Identifiable Information (PII):

PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). The loss of PII can result in substantial harm, embarrassment, and inconvenience to individuals and may lead to identity theft or other fraudulent use of the information. To protect PII, the finding in the attached report does not contain any student PII. Instead, each of the findings reference students only by a student number. The student numbers were assigned in Appendix A, Student Sample. Please see the enclosure Protection of Personally Identifiable Information for instructions regarding submission to the Department of required data / documents containing PII.

Record Retention:

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24.

Halifax Community College

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We would like to express our appreciation for the courtesy and cooperation extended during the review. Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact Lynette Davis at 404-974-9289 or Pursuant to Lynette.Davis@ed.gov.

Sincerely,

(b)(6); (b)(7)(C); (b)(7)(C)

Christopher Miller
Compliance Manager

cc: Ms. Tara I. Keeter, Financial Aid Administrator

Enclosure:
Protection of Personally Identifiable Information

PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

Personally Identifiable Information (PII) being submitted to the Department must be protected. PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth).

PII being submitted electronically or on media (e.g., CD-ROM, floppy disk, DVD) must be encrypted. The data must be submitted in a .zip file encrypted with Advanced Encryption Standard (AES) encryption (256-bit is preferred). The Department uses WinZip. However, files created with other encryption software are also acceptable, provided that they are compatible with WinZip and are encrypted with AES encryption.

The Department must receive an access password to view the encrypted information. The password must be e-mailed separately from the encrypted data. The password must be 12 characters in length and use three of the following: upper case letter, lower case letter, number, special character. A manifest must be included with the e-mail that lists the types of files being sent (a copy of the manifest must be retained by the sender).

Hard copy files and media containing PII must be:

- sent via a shipping method that can be tracked with signature required upon delivery
- double packaged in packaging that is approved by the shipping agent (FedEx, DHL, UPS, USPS)
- labeled with both the "To" and "From" addresses on both the inner and outer packages
- identified by a manifest included in the inner package that lists the types of files in the shipment (a copy of the manifest must be retained by the sender).

PII data cannot be sent via fax.

Prepared for

Halifax Community College



START HERE
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FEDERAL STUDENT AID

OPE: 00798600

PRCN: 201230427920

Prepared by

U.S. Department of Education

Federal Student Aid

School Participation Division

Program Review Report

July 3, 2012

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OPE ID 00798600
PRCN 201230427920

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A. Institutional Information

Halifax Community College
200 College Dr.
Weldon, N. C. 27890-0089

Type: Public

Highest Level of Offering: Associate Degrees and Two-year Transfer

Accrediting Agency: Southern Association of Colleges and Schools

Current Student Enrollment: 2,000

% of Students Receiving Title IV: 90% (10/11 award year)

Title IV Participation

	<u>2010/2011</u>
Federal Pell Grant	\$5,000,114
Federal Supplemental Education Opportunity Grant (FSEOG)	\$ 35,311
Federal Work Study (FWS)	\$ 53,023
William D. Ford Direct Loan (FDLP)	\$ 2,873,650

Default Rate FFEL/DL: 09: 9.4%
08: 2.7%
07: 3.3%

B. Scope of Review

The U.S. Department of Education (the Department) conducted a program review at Halifax Community College (HCC) from June 4 to June 8, 2012. The review was conducted by Ms. Lynette Davis, Ms. Deion Thorpe and Mr. Robert Scott.

The focus of the review was to determine HCC's compliance with the statutes and federal regulations as they pertain to the institution's administration of Title IV programs. The review consisted of, but was not limited to, an examination of HCC's policies and procedures regarding institutional and student eligibility, individual student financial aid and academic files, attendance records, student account ledgers, and fiscal records.

A sample of 30 files were identified for review from the 2010/2011 and 2011/2012 (year to date) award years. The files were selected randomly from a statistical sample of the total population receiving Title IV, HEA program funds for each award year. In addition, 6 files were selected for FWS, based on no FWS students in the review sample. Appendix A lists the names and partial social security numbers of the students whose files were examined during the program review.

Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning HCC specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve HCC of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination letter.

C. Findings

During the review, several areas of noncompliance were noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by HCC to bring operations of the financial aid programs into compliance with the statutes and regulations.

FINDING 1: RETURN TO TITLE IV REFUND (R2T4) CALCULATION ERRORS

Citation:

Pursuant to 34 C.F.R. § 668.22, of the General Provisions regulations, states that when a recipient of a Title IV grant or loan assistance withdraws from an institution during a payment period, the institution must determine the amount of Title IV grant or loan assistance (not including FWS or non-Federal share of FSEOG awards) that the student earned as of the student's withdrawal date in accordance with paragraph (e) of this section.

The withdrawal date for a student who withdraws from an institution that is required to take attendance, including a student who does not return from an approved leave of absence, or who does not finish the payment period, the institution must use the last date of academic attendance as determined by the institution from its attendance records.

Area of Noncompliance:

The review of the institution's 2010/2011 refund calculations noted that the refunds for students 3, 4 and 10 were calculated incorrectly because the incorrect last date of attendance was used and the Title IV funds were returned inappropriately. The institution owes \$129.77 for student 3, the amount of \$4.83 is owed for student 4 and \$130.76 is owed, for student 10. For a total of \$265.36 owed to the Department.

Required Action:

The institution must provide assurances that refunds will be properly calculated and the correct amount returned.

The Institution must revise its procedures to address the refund errors and provide a copy in response to this letter.

FINDING 2: COMMON ORIGINATION AND DISBURSEMENT (COD) REPORTING DISCREPANCIES

Citation:

Pursuant to 34 C.F.R. § 690.83, requires institutions to submit a student's payment data (including disbursement dates) to the Secretary by the reporting deadlines published in the Federal Register. Institutions are required to submit FDL and Pell Grant disbursement

records to COD no later than 30 days after making a disbursement or becoming aware of the need to adjust a student's previously reported disbursement (COD Technical Reference, 2008-2009, Volume II). The disbursement date is the date that the institution:

- a. Credits funds to a student's account, or;
- b. Pays funds to a student directly.

Refer to the COD Technical Reference, 2008-2009 and the June 9, 2008 Federal Register for the most recent reporting deadlines and requirements.

Area of Noncompliance:

The process dates reported to COD were not always accurate. A review of the Common Origination and Disbursement (COD) system revealed that some of the disbursement dates reported to COD by the Institution were processed more than 30 days after making the disbursement. This occurred for students 2, 5, 6, 7, and 9. The following examples are provided:

<u>Student</u>	<u>Date Disbursed</u>	<u>COD Processed</u>
2	9/16/10	11/9/10
5	9/16/10	2/4/11
6	9/7/10	2/4/11
7	9/16/10	11/9/10
9	9/16/10	11/9/10

Required Action:

HCC must review its reporting procedures to determine why disbursement and processed dates are accurate for some students and not others. You must correct and revise your procedures so that the disbursement dates reported to COD are the dates that FDL and/or Pell funds are credited to the student's account and the processed dates are no more than 30 days after funds are credited to the student's account ledger, or paid to the student directly. Please submit a copy of the revised procedures with your response to this report.

Please note that interest costs incurred by students begin to accrue on the date the loan is disbursed.

A review of the response will determine if any further action is required.

**FINDING 3: SATISFACTORY ACADEMIC PROGRESS (SAP) POLICY
INADEQUATE**

Citation:

Pursuant to 34 C.F.R. § 668.16(e), states that an institution must establish, publish and apply reasonable standards for measuring whether an otherwise eligible student is maintaining satisfactory progress in his or her educational program. These standards must conform with the standards of satisfactory progress of the institution's nationally recognized accrediting agency, and must be the same as or stricter than the institution's standards for a student enrolled in the same educational program who is not receiving assistance under a Title IV, HEA program. These standards must include:

(A) Qualitative Measure: Grades, work projects completed, or comparable factors, which are measured against a norm.

(B) Quantitative Measure: A maximum timeframe in which the student must complete his or her educational program. The timeframe must be: (1) based on the student's enrollment status; (2) for an undergraduate program, no longer than 150 percent of the published length of the educational program for a full-time student; and (3) divided into increments of equal size, not to exceed the lesser of one academic year or one-half the published length of the educational program.

(C) A schedule established by the institution designating the minimum percentage or amount of work that a student must successfully complete at the end of each increment to complete at the end of each increment to complete his or her educational program within the maximum time frame.

(D) A determination at the end of each increment by the institution whether the student as successfully completed the appropriate percentage or established schedule.

(E) Consistent application of standards to all students within categories of students, e.g., full-time, part-time, undergraduate and graduate students, and educational programs established by the institution.

(F) Specific policies defining the effect of course incompletes, withdrawals, repetitions and non-credit remedial courses on satisfactory progress.

(G) Specific procedures under which a student may appeal a determination that he or she is not making satisfactory progress.

(H) Specific procedures for reinstatement of aid.

Area of Noncompliance:

According to the institution's SAP policy, if a student performs satisfactorily during the probation period, but still does not reestablish SAP, the student may be reviewed for an additional probation term. According to the new regulations, there should not be another probation term.

Required Action:

The institution's Satisfactory Academic Progress (SAP) policy requires some corrections and modifications in the following areas: A student on Probation may only receive Title IV funds for one payment period. A student may not receive Title IV funds for the subsequent payment period **unless**:

- Student is now making SAP; or
- Institution determines the student met requirements specified by the school in the academic plan.

The institution must update the current policy to reflect the new changes required based on the new regulations that went into effect 7/1/2011. In response to this report, please provide a copy of the revised SAP policy.

FINDING 4: INVALID HIGH SCHOOL DIPLOMA

Citation:

Pursuant to 34 C.F.R. § 668.32, Student Assistance General Provisions advises a student is eligible to receive Title IV funds if the student is a regularly enrolled student or one who is accepted for enrollment in an eligible program at an eligible institution. Among other criteria, the student must have a high school diploma or its recognized equivalent or have a passing score on a specified, Department approved, independently administered test in accordance with subpart J of Section 668.32.

The Department recognizes several equivalents to a high school diploma:

1. A General Equivalency Diploma (GED);
2. A certificate demonstrating that the student has passed a state-authorized examination that the state recognizes as the equivalent of a high school diploma;
3. An academic transcript of a student who has successfully completed at least a two-year program that is acceptable for full credit toward a bachelor's degree; or

4. For a student who enrolls before completing high school, a high school transcript indicating the student has excelled in high school. The student must no longer be enrolled in high school; must satisfy your school's written policy for admitting such students, and must be starting a program that leads at least to an associate's degree or its equivalent.

The 2010-2011 Federal Student Aid Handbook, Volume 1, Page 1-6, in the sidebar notation of "What's a valid high school diploma", states with the appearance of high school "diploma mills", the school should contact the department of education for the state in which the high school is located to determine if the high school diploma is recognized by that state.

The student may also complete a GED or be home schooled under the applicable state law. 34 C.F.R. § 600.5 states that a proprietary institution of higher education that admits as regular students only persons who have a high school diploma; have a recognized equivalent of a high school diploma or are beyond the age of compulsory school attendance in the state in which the institution is physically located.

Area of Noncompliance:

The review of student files revealed that the diploma for student 30 had an invalid High Diploma from Corner Stone High School, located in Georgia. The Dean of Student Services and Enrollment Management stated that she knew about Corner Stone High School in Georgia being an invalid high school.

Required Action:

The high school diploma for student 30 appears to be from an invalid high school. This school required completion of little or no education or coursework to obtain the credential; and lacked accreditation by an accrediting agency or association that is recognized by the Secretary or a Federal agency, State government, or other organization or association that recognizes accrediting agencies or associations. For this student the school will have to repay all Title IV funds disbursed. The student received Federal Pell Grant funds of \$2,675 for 2009/2010, \$4,857 for 2010/21011 and \$4,856 for the 2011/2012 award years. For a total amount of \$12,388 from Federal Pell Grant funds disbursed.

The institution must develop and submit with its response, procedures which will ensure that, in the future, the admissions requirements will be consistently applied to all students. Also, only diplomas from valid high schools will be accepted to be Title IV eligible.

Repayment instructions will be provided in the Final Program Review Determination Letter.

FINDING 5: FEDERAL WORK-STUDY OVERPAYMENT

Citation:

Pursuant to 34 C.F.R. § 675.16, Federal Work-Study Program, an institution must pay a student FWS compensation at least once a month. It is the school's responsibility to monitor the FWS program. Students may not be scheduled for work and miss class time to perform FWS jobs.

Area of Noncompliance:

The review of the 2011/2012 FWS time sheets for student 36 revealed that there was a calculation error and the student was overpaid by one hour, which was \$7.25.

Required Action:

For student 36, the institution must repay to the Department the Federal share of the FWS funds paid for the incorrect calculation of \$7.25. The institution has a work-study waiver, therefore; the total amount of \$7.25 is owed to the Department.

Repayment instructions will be provided in the Program Review Final Determination Letter.

FINDING 6: LACK of DOCUMENTATION TO SUPPORT FFEL EXIT COUNSELING

Citation:

Pursuant to 34 C.F.R. § 682.604(g), Federal Family Education Program, the institution must conduct an in-person exit interview with each Direct Loan and FFEL Loan borrower shortly before the student ceases enrollment on at least a half-time basis in order to emphasize the obligation and consequences of default. General information such as repayment options, consolidation, and debt management strategies must also be provided to the borrower. If the borrower withdraws/graduates without the institution's prior knowledge and did not attend an exit interview, the institution must mail written counseling materials to the borrower within 30 days after learning the borrower has withdrawn/graduated.

Area of Noncompliance

There was no documentation to support FFEL exit counseling for student 12. There was no documentation to support if exit loan counseling had been mailed to the student.

Required Action:

The institution must send exit counseling information to student 12 and provide evidence in the response to this report.

The institution must also provide its assurances that exit loan counseling will be performed in a timely manner for all Direct Loan and FFEL borrowers.

FINDING 7: INCOMPLETE CONSUMER INFORMATION

Citation:

Pursuant to 34 C.F.R. § 668.43, each year a school must provide to enrolled students a notice containing a list of the consumer information it must disseminate, and the procedures for obtaining this consumer information. Schools must provide this notice through a one-on-one distribution.

Schools must also provide a notice (though not an individual notice) of student rights under the Family Educational Rights and Privacy Act (FERPA). 34 C. F. R. § 668.41- 48

Schools must also provide notice of a confirmation that the institution held an Educational program commemorating the September 17, 1787 signing of the Constitution On September 17th of each year (or preceding or following week, if the 17th falls on a Saturday, Sunday, or holiday) Pub. L. 108-447

Noncompliance:

HCC failed to comply with the followings consumer information requirements:

- Campus Security
 - Statement of policies encouraging accurate and prompt crime reporting (school has oral agreement)
- Drug and Alcohol Prevention
 - No Biennial Review Document
 - Institution had not measured the drug program effectiveness and assessed needed changes
 - No procedure in place to ensure the consistency of the enforcement of its disciplinary sanctions

- o No individual name given to be responsible for conducting the biennial review

Required Action:

HCC must update its consumer information to include the information listed above. The institution must submit an updated copy of its consumer information to this office with its response to the program review report.

D. Recommendations

The following is a recommendation based upon observations made by the review team during the program review. HCC is not required to provide a response to, nor is HCC required to act upon, these recommendations. However, the review team believes that adoption of this recommendation will assist the institution in its administration of Title IV, HEA program funds.

It is recommended, that the institution collect income data from students to address living expenses when students report zero income on the Free Application for Federal Student Aid (FAFSA).

It is also recommended that the institution update their programs on the Eligibility and Certification Approval Report (ECAR) to reflect the new clock hour and clock/credit hour conversion changes that went in to affect July 1, 2011.

Halifax Community College
Student Sample

2010/2011

	(b)(6); (b)(7)(C), (b)(7)(C)
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2011/2012

	(b)(6); (b)(7)(C), (b)(7)(C)
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College Work-Study

- 31. (b)(6); (b)(7)(C),(b)(7)(C)
- 32.
- 33.
- 34.
- 35.
- 36.



August 1, 2012

Lynette Davis
Federal Student Aid
61 Forsyth Street SW, Suite 18T40
Atlanta, GA 30303

Dear Ms. Davis:

We have received and reviewed the findings of the on-site Program Review at Halifax Community College. The college's response to the findings is presented in this letter and the enclosed items of documentation.

FINDING 1: RETURN TO TITLE IV REFUND (R2T4) CALCULATION ERRORS

The Financial Aid Office has updated the R2T4 procedures to include a review of all completed R2T4 calculations by an additional financial aid staff member to ensure accurate calculations. This additional review will eliminate errors.

Attachment #1 – Financial Aid Policy & Procedures, R2T4

FINDING 2: COMMON ORIGINAND DISBURSEMENT (COD) REPORTING DISCREPANCIES

The 2010-11 academic year was the first year Halifax Community College participated in the Federal Direct Loan program. In September of 2010 the first disbursements of Federal Direct Loans were processed through the Colleague software. The college did incur difficulties exporting to the Common Origination and Disbursement (COD) system during the first semester. During the 2010-11 academic year, a Financial Aid Loan Specialist was hired to manage the loan program. The Financial Aid Loan Specialist has received extensive training in both federal regulations and Colleague software usage.

Adequate office procedures are in place to ensure accurate reporting and timely exporting of Federal Direct Loan disbursements to COD. Exports are typically performed within 3 days of disbursement. The Financial Aid Loan Specialist reconciles monthly to identify any variances between the institution and COD. Any discrepancies are identified and corrected immediately.

Attachment #2 – Financial Aid Policy & Procedures, Procedures for Awarding and Disbursing Federal Direct Loans

FINDING 3: SATISFACTORY ACADEMIC PROGRESS (SAP) POLICY INADEQUATE

Halifax Community College has updated the institution's Satisfactory Academic Progress (SAP) policy to satisfy the new regulations that went into effect on July 1, 2011. The new policy ensures a student that has been granted a probationary term by successfully appealing to the Financial Aid Committee, may not receive Title IV funds unless the student is making SAP at the end of the probationary term or the student is meeting the specified requirements of an academic plan established by a Student Support Services, Academic Advisor.

Attachment #3 – Financial Aid Policy & Procedures, Satisfactory Academic Progress

FINDING 4: INVALID HIGH SCHOOL DIPLOMA

Halifax Community College has adopted a policy and procedure for checking the validity of a high school diploma. After reviewing the official transcript, if it is suspected the student bought the diploma or transcript and was required to perform little or no work, the student will be denied financial aid. In the future, admissions requirements will be consistently applied to all students and only diplomas from valid high schools will be accepted to be Title IV eligible. Any student identified as not having a valid high school diploma will be referred to Halifax Community College's GED center.

During the review, members of the US Department of Education review team met with Dr. Barbara Hasty, Dean of Student Services and Enrollment Management and Ms. Tara Keeter, Director of Financial Aid in reference to student 30. At the beginning of the meeting, Ms. Davis notified them that student 30 had an invalid high school diploma from Cornerstone School. Initially, the two agreed they were familiar with Cornerstone School. However, as discussion continued, it was realized by Dr. Hasty and Ms. Keeter that Ms. Davis was referring to a Cornerstone High School located in Georgia. Dr. Hasty and Ms. Keeter were originally under the impression that Ms. Davis was referring to Cornerstone Christian School located in Roanoke Rapids, NC (within HCC's local service area). Neither Dr. Hasty, nor Ms. Keeter, were aware that Cornerstone Christian School in Georgia is considered a diploma mill. When asked if they were familiar with what a diploma mill was, the two responded yes. Dr. Hasty mentioned that you can "google" diploma mills and find information on schools considered a diploma mill. Due to the statement listed in the Area of Noncompliance for this particular finding, there was obviously a misunderstanding between Ms. Davis and Dr. Hasty. At no time has Halifax Community College knowingly or purposely accepted high school diplomas that were invalid.

Halifax Community College has met with student 30 and notified her that she is ineligible to receive Title IV funds. The student was not aware that Cornerstone High School diplomas were not valid. She was referred to our GED center and has already passed 4 of the 5 series of test to obtain a GED. Therefore, given the misunderstanding between Dr. Hasty's statement in which

she was referring to Cornerstone High School in Roanoke Rapids (not the one in Georgia), and the students' progress toward a GED, and considering the new guidance that was issued by the US Department of Education, beginning with 2011-2012 (after the student was admitted), Halifax Community College is respectfully requesting that repayment of all Title IV funds be rescinded.

Attachment #4 – Admissions Policy & Procedures, Admissions

Attachment #5 – Student GED Scores

FINDING 5: FEDERAL WORK-STUDY OVERPAYMENT

The Federal Work-study supervisors and the Financial Aid Specialist II responsible for reviewing calculations of Federal Work-study will continue to review student timesheets for accuracy.

FINDING 6: LACK OF DOCUMENTATION TO SUPPORT FEEL EXIT COUNSELING

Exit counseling information has been sent to student 12. The Financial Aid Loan Specialist provides exit counseling information to any student that does not maintain half-time enrollment, withdraws from the institution, or graduates from the institution. To ensure exit counseling is performed in a timely manner for all Direct Loans, the Financial Aid Loan Specialist will review weekly drop/withdrawal lists provided to the Financial Aid Office by the Registrar's Office.

Attachment # 6 – Copy of Exit Counseling letter sent to student 12

FINDING 7: INCOMPLETE CONSUMER INFORMATION

Halifax Community College has incorporated procedures for notifying all students, faculty, and staff to of the policy of encouraging accurate and prompt crime reporting. Students and employees will be notified twice each semester via campus gmail and Blackboard postings. New students will also be notified at new student orientation and in their freshman experience classes. New employees will also be notified at new employee orientation sessions. The notices will include campus phone numbers and information on how to report incidents.

The Director of Counseling, Teresa Mayle, is the designated person responsible for conducting the biennial review of the drug and alcohol prevention program. The President of the college will sign the biennial review of the program. To ensure consistency of the enforcement of the disciplinary sanctions, the Dean of Student Services will sign each occurrence and the Vice President of Academic Affairs will sign as a reviewer. All consumer information is available via the college website.

Attachment #7 – Campus security policy and 510 Student Conduct

RECOMMENDATIONS

#1) Beginning the 2012-13 academic year, Halifax Community College has incorporated an Explanation of Low Income Form to document income data and address living expenses when students report zero or low income on the Free Application for Federal Student Aid (FAFSA).

Attachment #8 – Copy of an Explanation of Low Income Form

#2) The Eligibility and Certification Approval Report (ECAR) will be updated to reflect the new clock hour and clock/credit hour conversion changes that went into effect July 1, 2011. The ECAR changes will be made as soon as the Federal Program Review is final and access is regained by the institution.

Sincerely,

(b)(6); (b)(7)(C), (b)(7)(C)

Ervin V. Griffin, Sr., EDD
President/CEO

Attachment #1

1 Section Sixteen: Return of Title IV Funds

1.1 Recalculation

Federal regulations require recalculation of federal financial aid eligibility for students who withdraw, drop out, or are dismissed prior to completing sixty percent (60%) of an academic term. An example of the Return to Title IV Fund (R2T4) calculation is provided to the student in the award package on the Financial Aid information sheet and is available in the Financial Aid Office (FAO).

Recalculation is based on the percent of aid using the following formula:

Percent earned = Number of Days Completed Up to the Withdrawal Date – Divided By – The Total number of Days in a Semester/Term:

Following is the R2T4 calculation:

Number of days attended ÷ days in semester = % of semester completed

Total \$\$ disbursed × % completed = earned \$\$

Total \$\$ disbursed – earned \$\$ = \$\$ to be returned

1.2 Calculation Procedures

The institution defines the date the institution discovered the student withdrew as being the date the student was dropped on the roll. This date is submitted to the Registrar's Office via an electronic drop form. The date is stored in the Colleague software. This date used to determine deadlines for recalculation and return of funds.

The last day of attendance is the date the student last attended a class. This date is submitted to the Registrar's Office via an electronic drop form. The date is stored in the Colleague software. This date is used to determine the the number of days completed in the recalculation.

R2T4 calculations are assigned to and performed by a Financial Aid Specialist using the Calculate Return of Funds (ROFC) process in the Colleague software. A Return of Funds Report will be generated on individual students. To ensure proper and accurate calculations, an additional Financial Aid Specialist reviews each calculation. Once the calculation is completed and reviewed, it is forwarded to the Accounts Receivable Technician to be transmitted to the student's account. Once

transmitted to the student's account, a Financial Aid Specialist will electronically export the updated student record to the Common Origination and Disbursement (COD) system using the Export COD XML records (CODE) function in the Colleague software.

1.3 Overpayments

When the calculation results in an overpayment for which the student is responsible, the student is given 45 days to repay through Halifax Community College. The student should contact or visit the FAO to make payment arrangements on this balance. If the student fails to pay the debt to the College within 45 days of notification, the debt will be reported to the U.S. Department of Education as an overpayment. Federal eligibility is lost until the debt is paid or satisfactory arrangements are made with the U.S. Department of Education. Financial aid students should notify the FAO prior to withdrawing.

When the calculation results in an overpayment for which the Community College is responsible to repay to the US Department of Education, the funds will be returned. The Community College will seek repayment from the student.

Students wishing to withdraw should follow the withdrawal policy of Halifax Community College. All R2T4 calculations are based upon an official withdrawal, using the last day of attendance.

Return to Title IV calculations are based on the students' last date of attendance at the institution.

Attachment #2

1 Section Twelve: Procedures for Awarding and Disbursing Federal Direct Loans

The Federal Direct Loan Program is comprised of three loans:

1. The Federal Subsidized Stafford Loan.
2. The Federal Unsubsidized Stafford Loan.
3. The Federal Parent Loan for Undergraduate Students (Halifax Community College chooses not to participate at this time although approved by US Department of Education).

The FAO must certify each of these loans before a student may borrow from the Federal Direct Loan program. Policies surrounding each of these loan programs are outlined in Section 5. Procedures for loan processing are outlined below.

1.1 Loan Application Procedures

For students that have completed the FAFSA and a valid ISIR has been received by the FAO, the student may apply for a Federal Direct Loan. Students wishing to request a loan through the Federal Direct Loan program are required to submit the Direct Loan Master Promissory Note (MPN) to the US Department of Education. In addition, students are required to complete an Online Entrance Counseling Session with the US Department of Education. Notification from the US Department of Education of the MPN status and Entrance Counseling verification is imported electronically and stored in the Colleague software. The final step in the application process is completion of the Stafford Loan Request Form. This form is used to assist students in calculating the amount of funds needed. After the review of the request by the Financial Aid Loan Specialist II, the student may be required to visit the FAO to discuss the request. Following are the steps to apply:

1. Complete with the US Department of Education, the Online Entrance Counseling Session at www.studentloans.gov. (First-time borrowers only)
2. Submit to the US Department of Education, a Master Promissory Note at www.studentloans.gov. (First-time borrowers only)
3. Submit to the FAO, a Stafford Loan Request Form (First-time and previous borrowers)

Students needing assistance with the application processes are assisted by the FAO in the Financial Aid Computer Lab located next door to the FAO in Room 338. Instructions on how to apply for a Direct Loan is found on the website: www.halifaxcc.edu/finaid/fedloans.htm .

1.2 Right to Refuse Loan Origination

The school also reserves the right to refuse to originate a Direct Loan or may reduce the borrower's determination of need for the loan if the reason for that action is documented and provided to the borrower in writing, and if all of the following occur:

1. The determination is made on a case-by-case basis.
2. The documentation supporting the determination is retained in the student's financial aid file.
3. The school does not engage in any pattern or practice that results in a denial of a borrower's access to Direct Loans because of the borrower's race, gender, color, religion, national origin, age, disability status or income.

1.3 Loan Awarding Procedures

1.3.1 Federal Subsidized Stafford Loans

Once a student has completed the 3 steps to apply for a Federal Direct Loan, the student's record is processed using the Student Packaging Definition (SPCK) feature in the Colleague software. Award Eligibility Criteria (AEC) contains rules, defined below, have been established within the Colleague software for the loan award code (DSUB) to ensure the following criteria have evaluated:

1. MPN has been received (FAAEMPNA)
2. Entrance Interview on file (FAAELEEI)
3. Financial aid file is complete (FAAEFILC)
4. Financial Aid Verification is complete or not selected (FAAEVERC)
5. Eligible program of study (FATRELPG)
6. Satisfactory Academic Progress status (FAAESAP)
7. Enrollment of 6 or more credit hours (FAAE6CR)
8. Not in default or overpayment (FAXXDFOV)

When awarding the student a loan, if any of the above criteria are not met, the Colleague software will "fail" the student and the student will not be awarded. If the student passes all of the above criteria the loan is awarded through the Colleague software using the following global eligibility limits:

1. Grade level determination for loan amount (FAAMYR & FAYR1ST)
2. Unmet need and cost is not exceeded

1.3.2 Federal Unsubsidized Stafford Loans

Once a student has completed the 3 steps to apply for a Federal Direct Loan, the student's record is processed using the Student Packaging Definition (SPCK) feature in the Colleague software. Award Eligibility Criteria (AEC) contains rules, defined below, have been established within the Colleague software for the loan award code (DSUB) to ensure the following criteria have evaluated:

1. MPN has been received (FAAEMPNA)
2. Entrance Interview on file (FAAELEEI)
3. Financial aid file is complete (FAAEFILC)
4. Financial Aid Verification is complete or not selected (FAAEVERC)
5. Eligible program of study (FATRELPG)
6. Satisfactory Academic Progress status (FAAESAP)
7. Enrollment of 6 or more credit hours (FAAE6CR)
8. Not in default or overpayment (FAXXDFOV)

When awarding the student a loan, if any of the above criteria are not met, the Colleague software will "fail" the student and the student will not be awarded. If the student passes all of the above criteria the loan is awarded through the Colleague software using the following global eligibility limits:

1. Grade level determination for loan amount (FAAMYR & FAYR1ST)
2. Unmet need and cost is not exceeded

1.4 Loan Amount Limits

There are limits on the maximum amount a student may borrow each academic year, referred to as annual loan limit. In addition, there are lifetime loan limits, referred to as aggregate loan limits. The amount a student can borrow each year depends on the grade level, dependency status, and cost of attendance. Borrowing must not exceed the annual or aggregate loan limits established by the US Department of Education.

Depending on financial need, a student may be eligible to receive a subsidized loan for an amount up to the annual subsidized loan borrowing limit for their grade level. If the student has education expenses that have not been met by subsidized loans and other aid, the student may also receive an unsubsidized loan so long as the combined subsidized and unsubsidized annual loan limits are not exceeded.

1.4.1 Dependent undergraduate annual loan limits are as follows:

1. Undergraduate Freshman - \$3,500 subsidized, plus \$2,000 unsubsidized (combination of loans not to exceed \$5,500).
2. Undergraduate Sophomore- \$4,500 subsidized, plus \$2,000 unsubsidized (combination of loans not to exceed \$6,500).

1.4.2 Independent undergraduate annual loan limits are as follows:

1. Undergraduate Freshman - \$3,500 subsidized, plus \$6,000 unsubsidized (combination of loans not to exceed \$9,500).
2. Undergraduate Sophomore- \$4,500 subsidized, plus \$6,000 unsubsidized (combination of loans not to exceed \$10,500).

1.4.3 Aggregate loan limits for undergraduates are as follows:

1. Dependent Undergraduate - \$31,000 (No more than \$23,000 may be in subsidized loans).
2. Independent Undergraduate - \$57,500 (No more than \$23,000 may be in subsidized loans)

1.5 Loan Originations

Once a Federal Direct Loan has been awarded to a student, the Financial Aid Loan Specialist II exports the loan origination electronically to the US Department of Education through the Export COD XML Records (CODE) process in the Colleague software. Loan originations are exported as needed to meet federal guidelines.

1.6 Loan Disbursements

Loan disbursements are scheduled periodically throughout the semester, with the first scheduled disbursement scheduled after 30 days from the first day of the semester. Disbursements are electronically transmitted to student accounts using the Financial Aid Transmittal Process (FATP) in the Colleague software. Transmittal rules have been established within Colleague to ensure student eligibility at the time of disbursement. Once disbursements have been transmitted, the Financial Aid Loan Specialist II is responsible for electronically exporting the student disbursement records to COD using Export COD XML Records (CODE) process. Export of student disbursement records should occur immediately following the transmittal, but no later than 30 days following transmittal.

Within 30 days of the disbursement the FAO will mail a letter to the student providing the following information:

1. Type of loan
2. Amount of disbursement
3. Date of disbursement

The college uses passive acceptance if the student does not notify the FAO of a desire to decline the loan or change the terms of the loan within 14 days of the date of the notification letter. The letter provides guidance to the student's on the process required to decline or reduce the loan.

Combined loan disbursement will not exceed the annual aggregate loan limits established by the US Department of Education. If an overpayment of Direct Loan occurs the student's record is placed on hold until the overpayment is rectified. The FAO will request through memorandum to the Business Office for the loan

overpayment to be returned to the US Department of Education via G5. CODE will be executed within Colleague software to export the correction to the US Department of Education. Overpayments generally occur when other resources of aid is received after loans have been disbursed.

Attachment #3

1 Section Fourteen: Satisfactory Academic Progress

All financial aid recipients are required to meet satisfactory academic progress guidelines established by Halifax Community College (HCC), pursuant to regulations established by the U.S. Department of Education. The intent of this policy is to insure that students who are receiving federal and state financial aid are making measurable progress toward completion of a program in a reasonable period of time and a reasonable number of credit hours attempted in their program of study.

1.1 Measurements

Satisfactory Academic Progress (SAP) consists of three measurements.

1.1.1 Qualitative Measurements

A student must maintain a minimum grade point average (GPA) of 2.0. The calculation for GPA is inclusive of grades earned in developmental coursework effective July 1, 2011. The GPA calculation will differ from the academic calculation.

1.1.2 Quantitative Measurements

1.1.2.1 Completion Rate

The student is required to earn passing grades in two-thirds (67%) of attempted credit hours (cumulative). To calculate completion rate, credits earned are divided by credits attempted.

The following coursework is included:

1. Transfer credits from other colleges or universities are counted as attempted and earned (Grade scheme of CT).
2. All curriculum credits attempted at Halifax Community College, including developmental coursework credit, are counted as attempted.
3. All credits in which a passing grade is earned are counted as attempted and earned (Grade scheme of A, A*, B, B*, C, C*, D).
4. All credits in which a passing grade is not earned are not counted as attempted and unearned (Grade scheme of F, F#, WD, WP, WF, IP, I).

1.1.2.2. Maximum Time Frame

Federal regulations set the maximum time frame in which a student must complete his/her educational program in 150% of the normal length of the educational program using the number of credit hours required to earn the academic credential and to compute the 150% rate. An HCC student is not eligible for financial aid when the cumulative number of credit hours attempted (whether or not earned toward the student's current program of study) is equal to or greater than 150%. This is true whether financial aid was received or the student paid for some classes from his/her resources. Once the student exceeds the maximum time frame, the student's eligibility ends.

The following coursework are included as attempted credit hours:

1. Credits for developmental coursework in excess of 30 credits.
2. Transfer credit from other colleges or universities are counted as attempted (grade scheme of CT).
3. All curriculum coursework credit hours.

The following are excluded or subtracted from attempted credit hours:

1. Credits for developmental coursework attempted, not to exceed 30.
2. Credits for certificates, diplomas, and/or associate degrees earned.

1.2 Satisfactory Academic Progress Statuses

1.2.1 Satisfactory Status

A student is satisfying both qualitative and quantitative measurements (GPA and completion rate).

1.2.2 Warning Status

When a student does not meet the quantitative or qualitative measurements at the end of the term/semester, the student is placed on a warning status. The student is required to meet with a staff member of the FAO to discuss

the deficiencies and requirements to regain SAP. The warning status is only for one term. The student is eligible for aid while on warning status.

1.2.3 Suspension Status

When the student does not meet the quantitative or qualitative measurement at the end of the warning status term/semester, the student is placed on a suspension status. The student remains on suspension and ineligible for aid until SAP has been reestablished. The student has the right to appeal.

1.3 Frequency of Evaluations

At the end of each term/semester (payment period), once all final grades are recorded on the student academic record (transcript), the student's SAP is calculated and SAP status is determined.

1.4 Method of Evaluation

The FAO uses the Satisfactory Academic Progress Calculation (SAPC) in the Colleague software to establish statuses. Calculations resulting in Maximum Timeframe are printed and reviewed for exclusion credits. If a student has eligible exclusions, see 1.2.2, a manual calculation is performed. If the FAO deems the student eligible, the corrected status is "pushed" (recorded) in the Colleague software.

Review of the SAP status occurs during the awarding process through rules established in Colleague. When a student has been in non-attendance, there may not be a SAP history stored electronically in Colleague. In this case, the FAO will process the student through SAPC and a manual review.

1.5 Notification

The FAO notifies students in writing within one week of a student being placed on warning status or suspension status. A copy of the notification is stored in the student's financial aid file.

1.6 Student Right to Appeal

A student assigned to a suspension status or exceeding the maximum timeframe has the right to an appeal if extenuating circumstances caused the student to not meet SAP measurements. The student must complete the appropriate appeal request and provide any supporting documentation applicable. The appeal is reviewed by the Financial Aid Committee (FAC) or the Director of Financial Aid. If the FAC approves the appeal, the SAP requirements are lifted for one term and the student is granted a probation term. A student approved for probation is required to meet with a Student Support Services Academic Advisor to establish an academic plan to ensure SAP will be reestablished. The student will remain eligible for aid as long as the requirements of the academic plan are met. When a student does not reestablish SAP and the academic plan requirements are not achieved, the student is placed returned to a suspension status. The student may not appeal again for the same reason (circumstances) if the academic plan requirements are not met. The student's progress and the successful completion of the academic plan requirements will be reevaluated at the end of the probation term/semester. The FAO sends written notification of the appeal decision to the student.

1.7 Reestablishing SAP

If the student chooses not to appeal or an appeal is denied, the student may use its own resources to attend in an effort to reestablish SAP eligibility. Once it is determined the student has reestablished SAP, the student's satisfactory status will be reinstated.

Attachment #4

High School Validation Policy

Policy and Procedures for Evaluating the Validity of High School Diplomas and GED's

To verify the validity of high school diplomas and GED's, Admissions staff will:

- Verify that the diploma was received from a regionally accredited public, private or online high school (list of acceptable accrediting agencies is attached); or
- Verify that the diploma was received from an unaccredited public or private high school that is registered with an appropriate education agency such as the North Carolina Department of Non-public Instruction; or
- Verify that online high schools are regionally accredited or accredited by the Distance Education Training Council (DETC); or
- Verify that home school transcripts are submitted along with a letter acknowledging that the home school is registered with the NC Division of Non-Public Education; or
- Verify that the GED was received by a regionally accredited program; and
- Verify that the school is NOT listed on the attached list of high schools that do not meet the standards to qualify for financial aid.

Additionally, Admissions staff will verify that accepted diplomas were issued by high schools with a CEEB code. If the high school has no CEEB code, Admissions staff will investigate the high school further to determine the validity of the diploma. If it is suspected the student bought the diploma or transcript and was required to perform little or no work, the student will be ineligible for Title IV funds.

If a diploma or GED is determined to be invalid, Admissions staff will log the transcript and code it as invalid on the IASU screen in Colleague. Instructions for coding invalid transcripts on IASU are attached. Schools deemed to be invalid will be added to the list of schools that do not meet the standards to qualify for Title IV funds.

Admissions staff will assign a code on the CRI screen in Colleague so that a letter and email can be sent to the student advising that their diploma has been deemed invalid and that they will be unable to receive Title IV funds. Students with invalid high school transcripts will be referred to the GED center.

The list of Invalid High Schools will be updated and maintained by the Director of Admissions.

High School Validation Policy

Based on guidance from the Department of Education, the following high schools do not meet the standards to qualify for Title IV funds. Effective July 1, 2011, students that have graduated from these high schools MAY not be able to receive federal financial aid.

Adison High
Atlantic International Institute
Belford High School
Columbia North High School with Capital Network
Continental Academy
Cornerstone Christian
Enterprise Online High School
Excel High
First Coast Academy
Jefferson Online High
John Adams Virtual
Justice Fellowship International College
Lincoln Academy
Marwin High School
Nations High School
PennFord High School
Southeastern High Online Florida
Winford High School
Woodfield High School

*These schools allow students to pay a fee and receive their high school diploma within as little as a few days with minimal instruction.

Guidance for pertinent staff members that handle high school transcripts

When working with an applicant or application, that indicates the student has graduated from one of the listed high schools, please take the following steps:

- IASU-key this specific code in the comment section at the bottom of the screen **HSVAL**

The screenshot displays the DATATEL Colleague UI 4.0 application. The main window shows a form for 'IASU - Institutions Attended Summary'. The form includes the following fields and values:

- Institution: (171)07 Community College
- Transcript Type: 1
- Years Attended: 2
- Start/End Dates: 1/1/2005 to 12/31/2008
- Rank and/or PG: 1
- Graduation Type: 1
- Contact: 1
- High School GPA: 3.0
- Summary Credits: 12
- Degree/CEOs: 1
- Comments: HSVAL

- CRI-assign this code so that a letter and email can be sent to the student **ADCHSVAL**

Attachment #5

Examinee Form

(b)(6); (b)(7)(C)

Total Standard Score

0

Status

Incomplete

Date of Birth

(b)(6); (b)(7)(C); (b)(7)(C)

Total Average Score

(b)(6); (b)(7)(C)

SSN

Date

Tested By

NC

Tested At

Gender

Female

Credentialing Information

Credentialing Status

N

Credentialing Date

Credentialing Number

Last Credential Print Date

Best Tests

Description	Test Date	Form Code	Std Score	Percentile
Social Studies	07/26/2012	IJ	480	42
Science	07/25/2012	IJ	500	50
Language Arts, Reading	07/25/2012	IJ	460	34
Mathematics	07/26/2012	IJ	430	24

Status Message:

User-Defined Values

Description	Value	Description	Value
State Used 01	Q	State Used 02	Q
State Used 03	Q	State Used 04	Q
State Used 05	Q	State Used 06	Q
State Used 07	Q	State Used 08	Q
State Used 09	Q	State Used 10	Q
State Used 11	Q	State Used 12	Q
State Used 13	Q	State Used 14	Q
State Used 15	Q	State Used 16	Q
State Used 17	Q	State Used 18	Q

Examinee

Test

Update

Criteria

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HALIFAX

Community College

July 19, 2012

DL Exit Counseling
SID #: 0385621

(b) (6), (b) (7)(C)

Dear (b) (6), (b) (7)(C)

During your enrollment at Halifax Community College you were a recipient of a Federal Stafford Loan. Federal regulations governing Title IV Aid require students undergo exit counseling upon graduating, withdrawing or dropping below half-time attendance. Exit counseling helps you understand your rights and responsibilities as a student loan borrower. Also, it provides useful tips and information to help you manage your loans.

You may complete exit counseling online at www.nslds.ed.gov. If you prefer, exit counseling can be completed in person. For details or to schedule an appointment, contact the financial aid office.

Enclosed is an Exit Counseling Guide for Direct Loan Borrowers. Complete the Student Contact Information on page 15 and submit it to HCC Financial Aid Office. If you have questions or concerns please call 252-536-7244.

Sincerely,

(b)(6); (b)(7)(C);(b)(7)(C)

Pat Hux
Financial Aid Loan Specialist

Attachment #7

204.03 Weapons on Campus:

It shall be unlawful for any person to possess, to carry, whether openly or concealed, any gun, rifle, pistol, dynamite cartridge, bomb, grenade, mine, powerful explosive as defined in G.S. 14-2284.1, bowie knife, dirk, dagger, slingshot, leaded cane, switch-blade knife, blackjack, metallic knuckles or any other weapon of like kind not used solely for instructional or school sanctioned ceremonial purposes, in any public or private school building or bus, on any public or private school campus, grounds, recreation area, athletic field, or other property owned, used or operated by any board of education, school, college, or university board of trustees or directors for the administration of any public or private educational institution. For the purpose of this section, a self-opening switch-blade knife is defined as a knife containing a blade or blades which open automatically by the release of a spring or a similar contrivance, and the above phrase "weapon of like kind: includes razors and razor blades (except solely for personal shaving) and any sharp pointed or edged instrument except unaltered nail files and clips and tools used solely for preparation of food, instruction, and maintenance. This section shall not apply to the following persons: Officers and enlisted personnel of the armed forces of the United States when in discharge of their official duties as such and acting under orders requiring them to carry arms or weapons; civil officers of the United States while in the discharge of their official duties, officers and soldiers of the militia and the national guard when called into actual service, officers of the State, or any country, city, or town, charged with the execution of the laws of the State, when acting in the discharge of their official duties, and pupils who are members of the Reserve Officer Training Corps and who are required to carry arms or weapons in the discharge of their official class duties, and any private police employed by the administration or board of trustees of any public or private institution of higher education when acting in the discharge of their duties.

Any person violating the provision of this section shall be subject to dismissal if an employee, to expulsion if a student, and to criminal prosecution.

Firearms brought onto the campus of Halifax Community College for instructional or school sanctioned purposes must be cased, bolts open, broken down, cylinders open, magazine removed, and slides back.

205.00 Smoking

All Halifax Community College buildings (on campus and off-campus sites) and college vehicles are designated smoke-free.

205.01 Alcohol and Illegal drugs

Possessing, using, transmitting or being under the influence of any narcotic, hallucinogenic drug, amphetamine, barbiturate, marijuana, alcoholic beverage or any other kind of intoxicant while on campus. Faculty/staff or Students using drugs officially authorized by a physician and likely to cause impairment to perform in lab, shop, or clinical areas should consult with the instructor or supervisor. Note: Using a drug officially authorized by a physician will not be considered a violation of this regulation. HCC under the recommendations from your physician will determine if you are able to perform your job duties. The department head may require you to take personal/sick leave if available until which time you are able to perform your duties without any impairment of such impairing substances. Faculty/staff or Students under or presumed to be under the influence of a controlled substance as listed above, may be subject to removal from the classroom and or campus. The process will be followed according to the student handbook and policy manual section 510.00 Student Conduct and the employee handbook. See catalog for additional Employment/student referrals to on campus-off campus treatment and prevention services, page 93-95.

206.00 Crime Awareness and Campus Security

Part of the role of the Business Office is to ensure a safe educational environment for all faculty, staff, students, and visitors at Halifax Community College campus locations. Known and suspected violations of federal and state laws and emergencies should be reported to college Security Officers/ on campus Police Officer or to the Receptionist at 536-7200. Immediate access to law enforcement officials or for medical attention may be obtained by calling 911. The College provides non-sworn security officers who have full powers of sworn officers with the exception of carrying weapons or having the power to make arrests. By authority of the Halifax Community College Board of Trustees, the Weldon Police Department will be called if arrests are necessary. *** Amended 2012*** HCC has partnered with the Town of Weldon Police Department through a verbal MOU to have a sworn officer on campus during business operations. This officer has full arrest powers both on and off campus within the city limits of Weldon, NC. This officer will hold a general certification issued by the State of North Carolina Criminal Justice Training and Standards which grants them full arrest powers within the assigned jurisdiction of the agency holding their certification. (NCGS 17C-2)

206.01 Criminal investigation-reporting

Any criminal act or violations of state and federal laws should be reported to the officer on campus. This officer will conduct an investigation into the matter as soon as the information has been provided by either the victim or by another reporting source. The officer will determine if there has been a criminal offense which meets the North Carolina General Statutes within a 24hr period from the initial report. All crimes will meet the statutory requirements as defined by the North Carolina General Statutes and approved by a magistrate or the District Attorney's Office of Halifax County. If it is determined that a criminal offense has been committed, the officer will notify college officials immediately. It will be at the discretion of the victim and the college to determine if prosecution or other formal discipline is desired. All criminal incidents (prosecuted or not) will be documented for Crime Statistics on campus and kept in a log. This log will be available to be view and kept in the on campus Police Office and Dean of Student Services by anyone who might request to see it. An annual report will be compiled and reported to appropriate agencies as required by law and made available to faculty, staff and students or any other person who wishes to view this data. The report will only display information required by The Jeanne Clery Act of 1990 and Higher Education Act of 1965. No personal indentifying information will be shared outside the college except when required by law.

Reporting of criminal acts or alleged criminal acts can be reported via campus email to the on campus Police Officer, in person, writing or by phone. All faculty and students and visitors have access to HCC website which has a contact number or email contact for which they may use to report an offense they feel threatens or violates the rights of a person. It will be the position of the college to keep the reporting person, victim and witness identity confidential when possible. This information will only be viewable by law enforcement and other officials who need this information to prosecute or other disciplinary actions. HCC will have a non-retaliation stance for reporters of any criminal; suspected abuse or ethical practices when the report is done in good faith. If the report is unfounded and the intent was to interrupt the normal business of the college, disciplinary action may be taken at the discretion of the president. *Also refer to section 510.00 Student Conduct for additional direction.*

Crime awareness is addressed annually at faculty & Student orientation. Crime awareness and prevention information is made available to faculty and students each semester. Faculty, staff, and students must take individual steps to protect themselves from becoming the victim of a crime. Working together as a campus community in prevention programs is essential.

Students participating in off-campus, college-sponsored activities need to report criminal incidents to the law enforcement agency having jurisdiction and inform the College administrator in charge immediately.

206.02 Sexual assault/battery reports

Halifax Community College is also committed to maintaining an environment where students and staff can work without the threat of sexual harassment or sexual assault. Any person who believes he/she is the victim of a sexual offense at Halifax Community College should contact either a campus police officer or a college administrator at 536-7200. If the assault occurs off campus or during a campus sponsored event, please notify the closest law enforcement agency (**911**) and administrator in charge. Prompt reporting is essential for your safety and future prosecution. If medical attention is needed, **call 911** and get medical care immediately, this will aid in your our health needs as well as collecting evidence. Remember, do not bath, shower or perform any grooming behaviors as this might remove or contaminate any evidence needed for successful prosecution. Reporting of this type of crime is very difficult and requires your assistance. Your identity will be kept confidential-on a need to know only basis. Halifax Community College has counselors available for students, faculty and employees who have been victims of a sexual offense and can refer students who need professional help to other state or local agencies. Female victims can request a female officer (if available) to make a report. HCC Police Officer will make every attempt to accommodate your needs and respect your wishes to prosecute, and will assist with changing class or work schedules if available. *Forcible / non-forcible sex offenses: are defined by NCGS 14-27.1 – 14-27.10* HCC will comply with recommendations or court orders for anyone found guilty of one of these offense. HCC, at the discretion of the President, Board of Directors and other administrative personal, may take additional action against the accused which could but is not limited to termination.

HCC will notify faculty/staff and students when criminal behavior or offenses have occurred on campus or near campus that might expose them to danger. HCC will use the colleges e-mail; post notices around campus and if needed, make announcements through the campus wide public announcement system.

HCC has a grievance procedure for faculty; student and staff members who has been accused or charged with a sexual offense. The process is explained in *section 8, 11, pages 23 and 31* of this policy manual and page 23 in the Student Handbook. The process will follow these guidelines with regards to time frame for reporting; appeals, and disciplinary actions taken.

A list of all sexual offenders required to register can be located via the internet at <http://sexoffender.ncdoj.gov/search.aspx>, and search by county, zip code or street address.

206.03 Access to Facilities

Access to college facilities is from 7:00 a.m. until 10:00 p.m., Monday through Friday. The library will have hours posted for public and student use on weekends for each semester. Access to facilities after hours and on weekends will be granted to specific users for events or other HCC functions. The access will be granted by the department head along with the chief of campus security. Hours may vary based on the needs of the college and approved by the President and Board of Directors.

Student Conduct

Since entrance into an institution of higher learning is completely voluntary, it is inherent that upon entrance to the institution students take upon themselves certain responsibilities and obligations. These responsibilities include academic performance and social behavior consistent with the lawful purpose of the College. The standards of behavior and performance may be higher than is required by law of the general public. Therefore, upon voluntary entrance into Halifax Community College, students have an obligation to adhere to the College standards.

Students will be expected to conduct themselves at all times as mature and responsible individuals and should show a high regard for college facilities and property and for the personal property of others.

Procedures

All college regulations must be observed. Students may be reprimanded, suspended, or dismissed from the College for conduct which is considered incompatible with good judgment while on campus and/or participating in college-sponsored activities, either on or off campus.

Violations of the student conduct policy will be referred to the Dean of Student Services and Enrollment Management. Disciplinary action will be taken when any student, group of students, or student organization:

1. Fails to observe the general standards of conduct or any specific policy, rule, regulation, or college procedure adopted by the college.
2. Acts in a manner not in the best interest of the college community.

In all proceedings, the principle of due process is guaranteed to the student. The student has the opportunity to fully respond to any charge of misconduct.

A student who violates federal, state, or local criminal or civil laws while on campus, at any college facility, or attending any activities that are sponsored, initiated, authorized, or supervised by the College, or when representing the college will be referred to local authorities. In addition, the student may be subject to disciplinary proceedings by the College. The College reserves the right to take immediate action should the presence of the student on campus be considered a serious and substantial danger to the operation of the College or to the welfare of the college community.

Charges

Faculty members have ultimate control over classroom behavior and may remove from the classroom any student engaged in disruptive conduct for that class period with/without issuing a Student Misconduct Report. Faculty members are encouraged to discuss the situation with the student and the department head. For repetitive violations a Student Misconduct Report should be filed.

Any member of the College may file a Student Misconduct Report for any student who violates College policy or is behaving in a disruptive manner. Charges of misconduct shall be prepared in writing and directed to the Dean of Student Services and Enrollment Management within three (3) days of the violation.

The Dean will conduct an investigation of the charges. As with any disciplinary matter, a student will be afforded due process rights. Based on the findings of the investigation the Dean may take any one of the following actions:

- a. Dismiss the charge for lack of merit
- b. Issue a warning notice in writing
- c. Remove the student from one (1) or more class periods
- d. Loss of privileges; denial of specified privileges for a designated period of time
- e. Denial of permission to be present in specified campus locations or college functions
- f. Restitution; compensation for loss, damage, or injury
- g. Discretionary sanctions; work assignments, service to the college or other related discretionary assignments.
- h. Place the student on temporary suspension from the College
- i. Dismissal/expulsion from the College

Student Appeal

Any student may appeal any disciplinary action. The student will notify the Dean of Student Services and Enrollment Management in writing within three (3) days of the disciplinary action. The Dean will schedule a hearing within ten (10) days, within two (2) days for suspensions. The appeal will be heard by the Student Appeal Committee. The student has the right to be represented by counsel at the hearing. The student should notify the Dean in advance of any parties who may be accompanying him/her at the hearing. This committee shall conduct the proceedings and file a record of the appeal hearing and its recommendation with the Vice President of Instructional Services Dean who shall inform the student of the decision of the appeal.

Any student wishing to see a further review of his/her case may do so by submitting a written request to the President. The President shall meet with the student within five (5) days and render a disposition. The student has the right to be represented by counsel at the hearing. The student should notify the President of any parties who may be accompanying him/her. Should the student not find satisfaction in the action taken by the President, he/she may appeal to the Board of Trustees by requesting such in writing to the President. The President will schedule a meeting with the student and the Board of Trustees and shall notify the student of the final decision of the board.

Student Conduct Policy 510.00 Codes & Violations

Please select the violation code(s) applicable to the disruptive behavior and place them on the front side of this sheet with a full description of the incident.

1. All forms of academic dishonesty including cheating, collusion, plagiarism, and forgery.
2. Knowingly furnishing false information to the College; forgery, alteration of documents with intent to fraud.
3. Physical abuse or intimidation of any person.
4. Theft, attempted theft, or damage to the College's property or to property of anyone on the College's premises.
5. Littering.
6. Failure to comply with the directions of college officials.
7. Unauthorized sale, solicitation, or distribution of goods or services on College property.
8. Possessing, using, transmitting, or being under influence of any non-prescription drug or illegal drug; Unlawful use, possession, manufacture, sale, or distribution of any illegal or controlled substance.
9. Use of alcoholic beverages, including the purchase, consumption, possession, or sale of such items, except where specifically authorized within regulations of the college.
10. Disruption or obstruction of college or college-sponsored activities which may include, but are not limited to teaching, administration, disciplinary proceedings, studying, cultural events, fire, police, emergency services, or other college activities.
11. Physical and/or psychological abuse, assault and battery, molestation, or threat of such actions against any member of the College community or visitors; endangering the health or safety of any such person.
12. Acts of harassment, written, verbal or physical, that stigmatizes or victimizes an individual on the basis of, but not limited to the following: race, ethnicity, religion, sex, sexual orientation, creed, national origin, ancestry, age, mental status, or disabilities.
13. Engaging in any form of forcible or non-forcible sexual offense and/or sexual harassment.
14. Indecent, lewd, disorderly, or obscene conduct or expression.
15. Profanity
16. Participating in or inciting a riot or an unauthorized or disorderly assembly.
17. Unauthorized entry into or presence in a college facility.
18. Refusing to depart from any property or facilities of the College upon direction by a college official.
19. Refusing to vacate a classroom upon order of the instructor of record, police staff, or Executive Cabinet member.
20. Gambling or holding a raffle or lottery on the campus or at any college function without proper college approval.
21. Using, possessing, or storing illegal or unauthorized arms classified as weapons, fireworks, explosives, or dangerous chemicals.
22. Physically detaining or restraining any other person; unauthorized obstructing the free movement of persons or vehicles on college premises or at college activities.
23. Abuse of computer and network access.
24. Unauthorized or fraudulent use of college facilities and/or equipment; including, but not limited to, the telephone system, mail system, computer system, transportation system, or use of any of the above for an illegal act.
25. Using sound amplification equipment, systems, or devices, except as permitted by the college; excessively loud music in parking lots or other areas of the college.
26. Violating fire and other safety regulations which include the misuse or damage of safety equipment.
27. Knowingly violating the terms of any disciplinary sanction imposed as a result of official findings of a violation of the conduct policy.
28. Violation of campus or college parking regulations.
29. Violation of college policy on smoking
30. Violation of local, state and/or federal laws
31. Abuse of the student discipline system, that includes, but is not limited to, failure to appear for a hearing; falsification, distortion, or misrepresentation of information before the hearing officer or committee; disruption or interference of the orderly conduct of student conduct hearings; false accusation of student misconduct, knowingly without cause; attempting to influence impartiality of a member of the hearing committee prior to and/or during the hearing process; harassment of witnesses or members of hearing committees, and the like.
32. Willfully encouraging others to commit any of the acts that have been herein prohibited.



Financial Aid Office
P.O. Drawer 809
Weldon, NC 27890
252-538-4334
www.halifaxcc.edu

EXPLANATION OF LOW INCOME FORM

Student's Name: _____ Date: _____

Student's SSN or HCC ID Number: _____

INTENDED PURPOSE

The purpose of this form is to assist the Financial Aid Office in verifying how the basic needs of your household were met during 2011 if you reported an annual income of \$3,000 or less per year and/or reported that you will not file taxes on the Free Application for Federal Student Aid (FAFSA). The income threshold described above is only for independent students or the parent(s) of dependent students.

INCOME EXPLANATION

Please indicate whether this form is being used to explain the income of the student or the parent(s).

- Student
- Parent(s)

Please check all of the boxes that apply to your situation and provide a monthly amount for each applicable category.

- Social Security Income/SS Disability Income Monthly Amount: _____
- Public Assistance/Welfare Monthly Amount: _____
- Child Support Monthly Amount: _____

If none of the above apply to your situation and you are supported by family or friends, you need to provide an estimate of the fair market value of rent, food, and utilities that are provided for you by another person.

- Supported by Family/Friends Monthly Amount: _____

Please use this space to explain your circumstances if none of the categories above are applicable.

Student Signature: _____ Date: _____

Parent Signature: _____ Date: _____