FINANCIAL AID POLICIES & PROCEDURES

1.0 INTRODUCTION

The California Western School of Law Financial Aid Office staff is dedicated to helping students through the financial aid application process and guiding students in making intelligent decisions about paying for law school. With these goals in mind, the Financial Aid Office offers an uncomplicated electronic application process as well as comprehensive individual and group student loan and debt counseling. The financial assistance programs administered by the Financial Aid Office at California Western School of Law include federal loans, private loans, and Federal Work-Study. Information about California Western’s scholarship programs is available on the California Western School of Law web pages at www.cwsl.edu, or by request from the Admissions Office.

Student aid programs are subject to federal and state statutes and regulations that continually change. While we make every attempt to keep you informed of new laws and regulations as they come about, you will benefit greatly from asking questions of the Financial Aid Office staff, keeping up with your law school email, and checking for notices posted on the Financial Aid Office web pages.

2.0 VETERANS EDUCATION BENEFITS

California Western School of Law is approved for the training of veterans and other eligible persons seeking a Juris Doctorate under the provisions of Title 38, United States Code. Veterans, survivors, and dependents should contact the Veterans Administration at 1-888-442-4551 for information about the types and amounts of education benefits available, how to apply for benefits, and answers to frequently asked questions. Next, contact Kelly Fernando, Associate Director of Financial Aid and School Certifying Official, at (619) 525-7060 or by email at kef@cwsl.edu to get the certification process started.

3.0 OVERVIEW OF THE FINANCIAL AID APPLICATION PROCESS

3.1 BEGINNING THE PROCESS

To begin your application for federal student loans and/or Federal Work Study (FWS) at California Western School of Law you must:

- Submit a FAFSA (see section G.4.0). The priority deadline is March 2. Students in the spring entering class have a priority deadline of September 30.

The Financial Aid Office will then review your situation and request additional information if necessary. Once your aid eligibility is determined, your aid package will be assembled, and the results will be made available to you via Net Partner.

3.2 COMPLETING THE PROCESS

Once your aid package has been assembled, you must:

- Review your financial aid package on Net Partner and approve, reduce, or decline each award. Once you have approved your awards (if you have made your seat deposit or are a current student) your eligibility information will be sent to the Direct Loan Servicer.
- E-sign your promissory note(s) online at studentaid.gov or sign and mail paper promissory note(s) to the Direct Loan Servicer. If you must have an endorser for your Federal PLUS Loan, have your endorser complete the online process.
• Complete online graduate student entrance counseling and any additional required documents requested by the Financial Aid Office. Missing documents are listed on the Documents tab of Net Partner.

If your FAFSA is selected for verification, you will also need to complete the verification process (section G.6.0).

4.0 FREE APPLICATION FOR FEDERAL STUDENT AID (FAFSA)

File a Free Application for Federal Student Aid (FAFSA) on the Web at studentaid.gov. You may e-sign your FAFSA using your Federal Student Aid ID (FSA ID). If you do not have a FSA ID, you may request one at fsaid.ed.gov.

The FAFSA school code for California Western School of Law is G13103. Once your FAFSA is processed, the federal processor will mail or email your Student Aid Report (SAR) to you, which will reflect the information you reported on your FAFSA. Read the letter portion of the SAR and review the reported information for accuracy. The processor will also send this information to all the schools you indicated on your FAFSA. Review your SAR to confirm that you listed California Western School of Law in the school section.

5.0 NET PARTNER

We will use the data from your FAFSA to determine your eligibility for aid, and we will award you the maximum amount allowed under your Cost of Attendance. You will then be sent an email notification that you can review your awards on Net Partner, at which time you would approve, reduce, or decline each award, enabling us to proceed with Loan Certification (G.7.0). You should also review the other screens located within the MENU for additional information.

6.0 VERIFICATION

Some FAFSAs are selected for a process known as verification, in which the financial aid office must verify some of the information you provided on your FAFSA for accuracy. Verification selections are made at random or when information is incomplete or seems unclear; either the federal processor or the Financial Aid Office may select your application for verification. If your application is selected for verification, there will be a comment to that effect in the Messages tab as well as missing documents in the Your Documents tab of Net Partner. Additionally, if the federal processor selects your application for verification, there will be a comment to that effect in the letter portion of your Student Aid Report (SAR).

If selected, you must submit a completed Verification Worksheet and, if applicable, a copy of an official IRS Tax Transcript to the Financial Aid Office. Since the data we are required to verify will not always be the same, we will supply you with a Verification Worksheet that is custom to your situation. Any award offered on Net Partner is subject to change after the verification process is complete.

7.0 LOAN PROCESSING

7.1 LOAN CERTIFICATION

We will electronically certify your eligibility for loans to the Federal Direct Loan servicer, verifying your enrollment and need for loans, once your financial aid file is complete, you have accepted some or all of your loans, and you have met the admission deposit requirements.
7.2 PROMISSORY NOTES
After receiving our certification, the Direct Loan Servicer will process your loan application (and in the case of PLUS Loan, perform a credit check). For Direct Unsubsidized and PLUS Loans, you must complete an electronic Master Promissory Note (MPN) at the Direct Loan website studentaid.gov. Once you have signed a Direct Subsidized/Unsubsidized or PLUS MPN, you will not need to sign another for ten years, unless you need an endorser for your PLUS loan, in which case a promissory note will be required for each loan application.

7.3 LOAN DISBURSEMENT
Once your loan is approved, a disclosure statement will be sent to you. The loan type and amount, the terms of your loan, and when your loan funds will be made available to the school will be indicated in the disclosure statement. Be sure to keep these statements for your records.

When the disbursement date arrives, the school will begin the process of drawing down your funds into your student account. At that time, the Financial Aid Office will verify your continued eligibility for the funds including your enrollment status and the completeness of your financial aid file. If all is well, your loan funds will be applied to your tuition account.

Excess funds from loan disbursements are usually available to students 1-2 business days prior to the start of classes, assuming you submitted your FAFSA by the application deadline and accepted your aid promptly. However, it is important that you arrange to cover your expenses in the event of a delay in the release of your excess funds.

As required by federal regulations, federal student loans must generally be made in two disbursements. Students will receive half of their total loan funds in their first trimester and the other half in their second trimester. Loan fees will be deducted from Direct Loans by the Direct Loan Program prior to disbursement. Please keep in mind that your funds are awarded based on your loan period, so your funds from each trimester need to last until the beginning of the next trimester.

8.0 STUDENT ELIGIBILITY
For detailed information about federal student aid eligibility, please refer to studentaid.gov/eligibility.

8.1 CRITERIA
To receive aid from federal student aid programs, you must meet certain criteria:
- For need-based programs such as Federal Work-Study, you must demonstrate financial need.
- You must be a U.S. citizen or eligible non-citizen.
- You must have a valid Social Security number (SSN) unless you’re from the Republic of the Marshall Islands, the Federated States of Micronesia, or the Republic of Palau.
- You must be enrolled or accepted for enrollment as a regular student working toward a degree or certificate in an eligible program. At this time, all JD and master's degree programs at CWSL are eligible programs.
- For all federal loan programs and many private loans, you must be enrolled at least half-time in courses which count towards your degree objective.
- You must meet satisfactory academic progress standards set by the school you are attending (see Section 10.0, Satisfactory Academic Progress).
- You must sign the certification statement on the Free Application for Federal Student Aid (FAFSA) stating that you are not in default on a federal student loan and do not owe money on a federal student grant and that you will use federal student aid only for educational purposes.
- You must be able to show that you are qualified to obtain a college education by having a high school diploma or a recognized equivalent such as a General Education Development (GED) certificate, or
completing a high school education in a homeschool setting approved under state law (or, if state law
does not require a homeschooled student to obtain a completion credential, completing a high school
education in a homeschool setting that qualifies as an exemption from compulsory attendance
requirements under state law).

9.0 APPLICATION DEADLINE AND PRIORITY PROCESSING
It is important that you meet the application deadline for financial aid if you wish to receive priority
consideration for Federal Work Study (FWS) funds. See the Financial Aid web pages for application deadlines.
Meeting the deadline ensures that your application will be considered for FWS funds and helps ensure the
timely receipt of your loan proceeds. You may apply for Federal Unsubsidized and Federal PLUS Loans even if
you miss the application deadline, but you may not apply for any federal aid for an award period that has ended.

If you are an entering student, or a continuing student applying for financial aid for the first time through
California Western, you must complete Graduate Student Entrance Counseling online at studentaid.gov
before we can disburse federal aid to you. Entering students may apply for financial aid after acceptance for
admission; loan applications will be certified once the admission deposit requirements have been satisfied.

10.0 SATISFACTORY ACADEMIC PROGRESS
A student receiving federal student aid must maintain Satisfactory Academic Progress (SAP). At California
Western School of Law, Satisfactory Academic Progress is defined as:

- Meeting all standards set out in the Statement of Academic Policies,
- Completing at least two-thirds of units attempted, and
- Being mathematically able to complete the requirements of the degree program within the allowed
maximum time frame, but not having completed the required number of units to complete the degree.

For multi-year programs, each student’s progress will be evaluated after every Summer trimester. For
programs lasting one year or less, progress will be evaluated at the end of every term.

10.1 QUALITATIVE AND QUANTITATIVE STANDARDS
Aid recipients must meet the qualitative and quantitative standards set forth in the California Western School of
Law Statement of Academic Policies, notably section VII. These standards include, but are not limited to, a
grade point requirement as well as a maximum time allowed to complete the requirements of the degree.

At the time of evaluation, the student’s number of units completed will be divided by the number of units
attempted. The resulting number must equal or exceed two-thirds in order for the student to maintain SAP.
Units which receive the following grades will be considered both completed and attempted: A+ through D-, Low
Pass, Pass, High Pass, Honors, CR. Units which receive the following grades will not be considered
completed, only attempted: F, I, IP, R, W, Fail, NC.

Also at the time of evaluation, the student’s remaining number of credits required to complete his or her degree
objective will be divided by the number of trimesters remaining before the end of the maximum time allowed to
complete that degree objective. If the result is equal to or greater than 14 units per trimester for a JD student,
LL.M. student, or MCL student, the student will be considered not to be maintaining SAP.

Example: If a student has 45 units remaining to complete his JD degree, and only three more trimesters will
take place before the fifth anniversary of his first date of matriculation (as per section 1.01 of the Statement of
Academic Policies), he will need to complete 15 units per trimester to complete his degree. He would therefore
not be considered to be maintaining Satisfactory Academic Progress for Financial Aid Office purposes.
A student that has completed the number of units necessary to complete his or her degree, but who has not met the qualitative requirements of the degree, is not maintaining Satisfactory Academic Progress.

10.2 MAXIMUM TIMEFRAME
The maximum time allowed for each program at California Western School of Law is listed below. In each case, the time is measured from the date of matriculation.

JD (incl. JD portion of JD/MBA and JD/MSW) .......... 5 calendar years
Master's Degree programs (Maestría, LL.M., MCL) . 2 calendar years

10.3 COURSE REPETITIONS
[see also Academic Policies §2.03] Repeated coursework shall not count as additional units towards SAP. The averaged grade shall be used in Financial Aid SAP calculations.

10.4 NONCREDIT REMEDIAL COURSES
[see also Academic Policies §2.01(C)] Students taking the intervention course for the first or second time may receive financial aid if otherwise eligible. Students taking the intervention course for the third time are considered not to be maintaining SAP and will not be allowed to receive federal student aid. The intervention course shall not count toward GPA or total units for SAP purposes.

10.5 FAILURE TO MAINTAIN SAP
A student who fails to maintain satisfactory academic progress will not be allowed to receive federal student aid, beginning with the next term that begins after the SAP evaluation is performed. Students who are on academic probation are allowed to receive federal student aid during the probationary term. Warning notices do not affect a student’s ability to receive federal student aid. Students who return to a satisfactory progress status will regain eligibility for federal student aid at the time that grades are entered for the credits that would bring them back into that status.

10.6 APPEAL
Students may appeal their denial of federal aid under the SAP policy to the Director of Financial Aid, who will evaluate such appeals on a case-by-case basis. All appeals must include a statement regarding the cause of the failure to maintain SAP, and information which shows that the circumstances have changed in such a way as to allow the student to re-establish SAP by the end of the next trimester or by the end of a specified time frame. Appeals must also set forth an academic plan which shows, term by term, how the student will progress towards SAP by overcoming the specific deficiencies which resulted in the failure to maintain SAP. If a student’s appeal is approved, they will be considered to be on Financial Aid Probation. A student on Financial Aid Probation is allowed to receive federal student aid. If the student on Financial Aid Probation fails to meet the requirements of an approved Academic Plan, the student will lose federal aid eligibility until they either regain SAP, or else submit a new appeal with a new academic plan and receive approval of that plan.

If a student regains SAP after a term of ineligibility, they may not request aid for a term that has ended. They may request aid for the current term, if that is possible.

Other sections of the Statement of Academic Policies which are particularly relevant to the maintenance of satisfactory progress include: 2.02, Courses Taken at Other Law Schools; 2.03, Retaking of Courses; 3.05, Adding and Dropping Courses after Enrollment; 6.03, Pass or Fail Courses; 6.04, Incompletes; and 2.01(C), regarding intervention courses.
11.0 TUITION DEFERMENT PROCEDURE

11.1 PROCEDURE
Students who receive student loans may defer payment of tuition and fees by filing a Tuition Deferment/Promissory Note with the Business Office. Your Tuition Deferment will be approved after your financial aid file is complete and your requested student loans have been approved by the lender. The deferment will apply to the amount of tuition and fees covered by the net amount of your approved student loans. With a valid deferment in place, you will not have to pay your tuition by the tuition deadline, but instead may have your tuition and fees deducted from your student loans at the time of disbursement.

11.2 CONSEQUENCES OF LOAN DENIAL
Note: If you defer tuition based in full or in part on a student loan and your loan is denied, the portion of tuition deferred based on the loan becomes due and payable immediately. Applicants with derogatory credit should be prepared to secure another method of financing or immediately seek an endorser who can cosign the loan. No institutional funding is available through California Western to replace loan funds if your loan is denied. See the Business Office Policies and Procedures.

12.0 COST OF ATTENDANCE & FINANCIAL NEED

12.1 COST OF ATTENDANCE (COA)
Your Cost of Attendance (also known as Student Budget) is determined by California Western and is made up of expenses related to the pursuit of a degree. The Cost of Attendance includes actual amounts of tuition and fees, along with allowances for books and supplies, room and board, transportation, and personal expenses. Please see the Cost of Attendance section of the Financial Aid Office web pages for more details.

Your Cost of Attendance serves as a cap on student financial aid: a student's total of student loans (including both federal and private student loans), Federal Work-Study awards, and scholarships or grants may not exceed the Cost of Attendance. If your allowable educational costs are not adequately covered by the standard COA, you may under certain circumstances request an increase to your COA; see the website or contact the Financial Aid Office for more information. If, after receiving the maximum aid allowed under your COA, you receive additional aid (e.g., a new scholarship) or reduce your COA (by dropping classes, for example), we may have to return the overawarded loan amounts to your lender, or similarly reduce other forms of student aid.

12.2 COURSES NOT COUNTED
Courses which do not count towards your degree will not be counted in your COA and will not count towards your half-time attendance requirement.

You may receive student aid for repeated courses only if CWSL has required you to repeat the coursework to meet graduation requirements and only during the first repeat. If a course must be repeated a second time, tuition for that course will not be counted in your COA and will also not count towards your half-time attendance requirement.

12.3 NEED-BASED AID
Eligibility for need-based aid is based in full or in part on financial need. Need-based aid includes Federal Work-Study and certain scholarships.

12.4 DEFINITION OF NEED
Financial need is determined using the following equation:
Cost of Attendance - EFC - Resources = Financial need

12.5 EXPECTED FAMILY CONTRIBUTION (EFC)
A formula established by federal law is applied to the information you report on your FAFSA to compute your Expected Family Contribution (EFC). Graduate students are considered independent, which means your EFC is based on your income and assets and your spouse’s income and assets if you are married.

12.6 RESOURCES
Resources are scholarships, grants, and non-federal sources of need-based-aid that must be counted as part of your financial aid package. Resources include, but are not limited to, scholarships from California Western School of Law, scholarships from other sources, grants, and state rehabilitation assistance. You must inform the Financial Aid Office of any outside educational assistance that you receive, including outside scholarships.

13.0 FINANCIAL AID PROGRAMS
The financial aid programs administered by the Financial Aid Office at California Western School of Law include Federal Work-Study, two Federal Loan Programs (the Federal Direct Unsubsidized Loan and the Federal Direct PLUS Loan), and various private loan programs. These programs are described briefly here. For more in-depth information, see the “Types of Student Aid” section of the Department of Education website at studentaid.gov. Feel free to call our office if you have any questions regarding the types of aid offered at California Western. You are required to submit a FAFSA to establish eligibility for federal aid, including Federal Work-Study, Unsubsidized Loans, and PLUS Loans.

California Western School of Law administers a campus-based student aid program: Federal Work-Study (FWS). Federal Work-Study is need-based aid. Your FAFSA must be on file by the application deadline in order to receive priority consideration for these funds.

13.1 FEDERAL WORK-STUDY (FWS) PROGRAM
Federal Work-Study provides eligible students an opportunity to earn money to help meet educational expenses. Federal Work-Study is awarded as an alternative to loans and other forms of aid, and is subject to the same Cost of Attendance cap that restricts student loans. First year students will only be offered FWS in cases of exceptional need and will be limited to five hours of work per week. Upper division students are limited to a maximum of twenty hours of work per week. Students attending fewer than twelve units may work up to 40 hours per week, irrespective of their year in school. Before beginning paid work under FWS, students need to have: a Federal Work-Study award, an offer from an employer, completed payroll paperwork including W-4 and I-9 forms, and a completed work authorization form.

13.1.1 FWS AWARDS
If awarded, your FWS award is listed on the Awards by Term tab in Net Partner. You can see the trimesters your award covers and the total amount that you may earn during that time.

13.1.2 FWS EMPLOYERS
FWS job listings are available in the Student Affairs section of the Student Portal. These listings include both on-campus and off-campus positions. If you know of an employer who is not listed but who wishes to hire you under Federal Work-Study, please contact the Financial Aid Office; there are certain requirements that the employer (whether on- or off-campus) must meet to participate in our program.

Special note on off-campus employers: To employ FWS student workers, an off-campus employer must pay 25% of the FWS student’s wages. The pay rate must be comparable to what a non-FWS employee would earn in that position. If an employer cannot afford to hire employees under this arrangement, there is a possibility...
that the job could be paid for by the CWSL Community Service Employment program (CSE): see the Community Service Employment section below for details.

13.1.3 COMMUNITY SERVICE EMPLOYMENT
In an effort to provide an opportunity for students to work for pay at local community service organizations who cannot afford to pay 25% of a student’s wages as required by the Federal Work-Study program, California Western School of Law has created the Community Service Employment program. Under CSE, CWSL pays the required share of a student’s Federal Work-Study wages at the off-campus organization. To be eligible for CSE, a student must have a Federal Work-Study award and receive approval from the Financial Aid Office. An additional requirement of the CSE program is that the student must work, or have worked, 50 hours of volunteer work under the Pro Bono Honors program before beginning paid employment through CSE. For information on the Pro Bono Honors program, please contact the Career & Professional Development Office.

CSE funding is limited. If the number of CSE applicants exceeds the available funding, preference will be given to students who have completed their 50 hours of Pro Bono work and students with high need. Applications are accepted during the first week of classes; late applicants will receive CSE awards only if funding is still available.

A list of CSE employers is available in the Financial Aid Office. Not all FWS employers are necessarily eligible to participate in CSE. If you wish to work for an off-campus employer who states that they cannot afford to pay the 25% share, and that employer does not appear on the CSE list, you must contact Financial Aid and make sure that the employer can participate in CSE before making any kind of commitment to that employer.

13.1.4 FWS ONBOARDING WITH HUMAN RESOURCES
The Financial Aid Office will provide you with a work authorization form that must be signed by you, Financial Aid Office staff, and your employer. If this is your first time working at California Western, you must also submit W-4 and I-9 forms to the Payroll Office and complete the onboarding process.

Only after your financial aid file and onboarding process are completed may you start work. You are required to maintain an accurate time record and to have your time record approved by your supervisor and submitted via the online payroll system by the appropriate deadline for the pay period.

13.2 FEDERAL DIRECT SUBSIDIZED AND UNSUBSIDIZED LOANS
The Direct Subsidized Loan is a federally subsidized, need-based loan which is only available to undergraduate students. The Unsubsidized Loan is a non-need-based loan which is available to both graduate and undergraduate students. The maximum amount that graduate students may borrow in Unsubsidized Loans is $20,500.00 per academic year, with a lifetime cap of $138,500.00, including any Subsidized and Unsubsidized Loans received as an undergraduate. The interest rate on Subsidized and Unsubsidized loans first disbursed from 7/1/2021 to 6/30/2022 is a fixed 5.28%. A loan fee of 1.057% will be deducted from each disbursement by the Direct Loan program. This fee will be redetermined effective 10/1/2021. Interest does not accrue on a Subsidized Loan as long as the borrower maintains at least half-time attendance at an eligible institution or during the six-month grace period after such enrollment ceases. The Unsubsidized Loan accrues interest during in-school, grace, and deferment periods, and that interest may be either capitalized or paid, at the student’s option. If capitalized, the accrued interest will be added to the principal loan amount when the loan enters repayment.
13.3 FEDERAL DIRECT PLUS LOANS
Graduate and professional students may borrow PLUS loans on their own, without a parent borrower. These PLUS loans are sometimes referred to as Graduate PLUS loans. PLUS loans have higher rates than Federal Subsidized and Unsubsidized loans, but are generally superior to private loans in most cases.

The interest rate on new PLUS loans first disbursed from 4/1/2021 to 6/30/2022 is a fixed 6.28%. A loan fee of 4.228% will be deducted from each disbursement by the Direct Loan program. This fee will be redetermined effective 10/1/2021. Students may borrow PLUS loans up to the school’s cost of attendance minus other aid. There is no lifetime limit.

PLUS loans require that the borrower not have an adverse credit history. To this end, a credit check will be performed as part of the PLUS loan approval process. Borrowers who do not pass the credit check may be able to borrow PLUS if they obtain a creditworthy endorser or successfully appeal the denial. The PLUS credit criteria are generally less stringent than those of private student loan programs.

PLUS loans have up to a ten-year repayment period and a minimum monthly payment of $50.00. Repayment begins within 60 days, but payments can be deferred while a student is attending school at least half-time. The Financial Aid Office recommends that you consider all of your potential resources and evaluate your costs before applying for PLUS loan funds and try to borrow as little as possible.

Please note: CWSL is not responsible for providing replacement funds should you be denied loans because of poor credit or any other eligibility issues. If you want to review your credit report, you may request free copies of your credit report(s) at www.annualcreditreport.com.

13.4 PRIVATE LOAN PROGRAMS
Private loans, also known as alternative loans or commercial loans, are generally more expensive than federal loans such as Unsubsidized Loans or PLUS Loans. Since the government does not insure or subsidize private loans, lenders frequently charge higher fees and/or charge a higher interest rate. The various deferment, repayment, and loan forgiveness plans available to federal student loans do not apply to private loans. In addition, private loan lenders require applicants to meet certain credit criteria and may require a cosigner. Most private loan programs allow you to borrow up to your Cost of Attendance minus other aid (scholarships, student loans, Federal Work-Study, state rehabilitation assistance, and so on). As with PLUS loans, private loans provide additional loan funds to students who are otherwise unable to meet education-related expenses; try to limit your borrowing as much as possible.

Private loans may not be used to circumvent the Cost of Attendance limit on total financial aid, as private loans are required to be counted as part of that total.

There are many different private loan programs available to law students. To qualify for a private loan, you must meet the lender’s eligibility criteria including their credit standards, which usually include a minimum credit score. Most private loan lenders offer loan pre-qualification, by phone or on their websites, to determine if you will be approved for their loans.

Please note: CWSL is not responsible for providing replacement funds should you be denied loans because of poor credit or any other eligibility issues. If you want to review your credit report, you may request free copies of your credit report(s) at www.annualcreditreport.com.

14.0 REFUNDS
All students who withdraw, drop units, are academically dismissed, or take a Leave of Absence after classes begin, will have their tuition reassessed according to the Business Office policies and procedures. In addition, federal student loan recipients are subject to the Return of Title IV Funds policy if they withdraw, take a Leave
of Absence, or cease to attend. This federally mandated policy applies to the Unsubsidized Loan Program and the PLUS Loan Program. Please refer to the Business Office Policies and Procedures for a full description of the federal refund policy and examples of how it is applied.

15.0 FINANCIAL AID OFFICE HOURS

The Financial Aid Office is normally open to students Monday through Friday from 8:00 a.m. to 5:00 p.m. Please be aware that the office occasionally closes for training sessions or staff meetings. Planned closings will be announced in advance.