

## Policies and Procedures

### XX-XX.XX -COPPIN STATE UNIVERSITY POLICY DEPARTMENT of DEFENSE VOLUNTARY EDUCATION PROGRAM COHORT DEFAULT RATE DISCLOSURE

- I. Policy Statement:** This policy describes the general criteria and procedures related to the recruitment of military personnel and their application for a private student loan and the disclosure of Coppin State University's Cohort Default Rate ("CDR") and loan repayment data.

**Reason for the Policy:** This policy conforms with the regulatory and governing directives of the Department of Defense's ("DoD") Voluntary Partnership Memorandum of Understanding ("MOU") between DoD Office of the Under Secretary of Defense for Personnel Readiness and Coppin State University. MOU Section 3, Educational Institutions Requirements for TA, item (h)(3), requires the University to disclose its student loan Cohort Default Rate (CDR) prior to offering, recommending, arranging, signing-up, dispersing, or enrolling Service members for a private student loans.

#### **II. Definitions:**

- A. Service Member:** Military service is defined as including: 1) full-time active-duty members of the five military branches (Army, Navy, Air Force, Marine Corps, Coast Guard and Space Force); 2) reservists on federal active duty; and 3) members of the National Guard on federal orders for a period of more than 30 days.
- B. Private Student Loan:** A loan provided by a private educational lender that is not a federal student aid loan and that is issued expressly for postsecondary education expenses to a borrower, regardless of whether the loan is provided through the educational institution that the student attends or directly to the borrower from the private educational lender.
- C. Financial Aid Advisor:** A person who is responsible for assisting prospective college students and their families with financial aid options at a college or university. They also provide instruction to students regarding student loan repayment options.
- D. Loan Counseling:** Counseling that is designed to familiarize borrowers with loan terms and conditions, the loan process and to educate borrowers on the repayment options, as well as the deferment process and default prevention.
- E. Cohort Default Rate:** A cohort default rate is the percentage of a school's borrowers who enter repayment on certain Federal Family Education Loan (FFEL) Program or William D. Ford Federal Direct Loan (Direct Loan) Program loans during a particular federal fiscal year (FY), October 1 to September 30, and default or meet other specified conditions prior to the end of the second following fiscal year.

**F. National Average Cohort Default Rate:** The number of students nationally in a cohort who default on their loans during a fiscal year divided by the total number of students nationally in the cohort, expressed as a percentage.

**G. Repayment Data:** Loan Data that consist of the number of borrowers who defaulted and number of borrowers in repayment during a particular federal fiscal year.

**III. Provisions:** Pursuant to DoD MOU Section 3(h)(3), “before offering, recommending, arranging, signing-up, dispersing, or enrolling Service members for...student loans, [the University will] provide Service Members access to an institutional financial aid advisor who will make available appropriate loan counseling, including...disclosing the educational institution’s student loan Cohort Default Rate (CDR), the percentage of its students who borrow, and how its CDR compares to the national average. If the educational institution’s CDR is greater than the national average CDR, it must disclose that information and provide the student with loan repayment data.” Service Members are directed to meet with an SCO as they enter the University; the SCO and financial aid advisors discuss all forms of financial aid with new students and disclose the CDR to students interested in discussing private loans. Coppin State University’s most recent official CDR is available via the College’s website (refer to How to Keep My Loans in Good Standing and section Student Loan Default Rate at Coppin State University.)

**IV. Responsible Executive and Office:**

Responsible Executive: Vice President for Enrollment & Student Services

Responsible Office: Office of Financial Aid and Director of Student Experience

**V. Entities Affected by this Policy:** Division of Enrollment Management & Student Services

**VI. Related Procedures:**

1) Student Financial Aid Information Disclosures, Student Loan Entrance and Exit Counseling

2) Middle States Verification of Compliance with Accreditation – Relevant Federal Regulations -Title IV Program Responsibilities