

John A. Gupton College

Student Guide to Financial Aid
(Financial Aid Handbook)

John A. Gupton College
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The purpose of this guide is to provide the students with the basic information regarding financial aid programs offered at John A. Gupton College. Also, this guide serves to give the students the knowledge of the procedures involved in applying for and receiving financial aid from John A. Gupton College.

Please keep in mind:

- All Federal financial aid rules and regulations are set out by the Department of Education. These are federal laws and regulations that the Office of Financial Aid is bound to abide by.
- Within its statement of purpose, John A. Gupton College does not discriminate on the basis of race, color, national origin, religion, age, or disability.

Student Rights and Responsibilities

Recipients of federal financial aid have certain rights and responsibilities that they must meet to maintain eligibility of financial aid.

Student Rights: All students have the right to know...

- What types of financial assistance are available
- What the procedures and deadlines are for submitting an application for financial aid.
- How the school determines your financial needs.
- How and when you will receive your financial aid.
- What the interest rate is on any student loan you have, the total amount you must repay, the length of time you have to repay and when you begin repayment.
- The school's policy in reconsidering your financial aid, if you believe a mistake has been made, or if your enrollment or financial circumstances have changed.
- How the school determines your satisfactory academic progress and how that will affect your aid eligibility.
- The school's refund policy if you do not complete an enrollment period in which you receive financial aid.

Student Responsibilities: All students that wish to use aid must...

- Accurately complete the FAFSA (as errors can and will cause delays in processing aid).
- Notify the Office of Financial Aid of any changes in your circumstances that may affect your aid eligibility.
- Complete any and all verification forms requested by the Office of Financial Aid in order to receive aid.
- Read thoroughly and keep copies of any and all forms you are asked to sign.
- Repay any student loans you opt to borrow: When you have signed your Promissory Note you are agreeing to repay your student loans just as any other loan you take. Failure to repay your student loan can affect your future credit scores.
- Complete both Entrance and Exit Counseling (as directed by the Office of Financial Aid) at www.studentloans.gov if you are opting to use student loans.
- Notify the college of any changes in your name, address, or attendance status. If you use student loans, you must also update your information with your lender.
- Understand the college's refund policies.

Tuition Refund Policy

Tuition paid or charged for the semester will be refunded as follows:

- 1.) 80% refund for withdrawals within the first 14 calendar days
- 2.) 40% refund for withdrawals within the second 14 calendar days
- 3.) No refunds for withdrawals after the first 28 calendar days

Financial Aid Application Process

- 1.) Before a new student can receive aid, they must have the admissions process fully completed.
- 2.) Students must apply for financial aid by completing a FAFSA application through the website, www.fafsa.ed.gov. Once the FAFSA has been completed, the Department of Education will process it and send the information to the Financial Aid Office where the student's aid eligibility can be determined fully.
- 3.) Aid eligibility is determined by calculations performed on the information reported on the FAFSA by the Department of Education. The result of these calculations is the student's EFC number. The EFC number is then used to show the student's level of need and this is what determines aid eligibility and award amounts.
- 4.) If the student opts to use a student loan he/she must complete a Master Promissory Note with the Department of Education. This can be done online at www.studentloans.gov. In addition, the student must also complete Entrance Counseling and this can be completed at www.studentloans.gov. (If a Parent Plus Loan is desired for dependent students, please contact the Financial Aid Office for information on applying).
- 5.) Each student will receive an award letter reflecting the aid he/she may qualify for. Once received the student must sign and return a copy of the letter to the Office of Financial Aid for processing or else no loans can be processed for the student.
- 6.) Each award year consists of two semesters. Every January the new FAFSA is available online at www.fafsa.ed.gov. All students must complete a new FAFSA each year in order to continue to receive aid. While there is no deadline to apply for aid, it is highly recommended students complete their new FAFSA as early in the year as possible.

** If at any point a student feels as though an error has occurred during their awarding process they can feel free to bring in documentation to the Office of Financial Aid for review. **

Independent or Dependent Status on the FAFSA

A student's eligibility status as a dependent or independent student is currently determined by the responses to Step Three on the FAFSA. In step three on the FAFSA several questions are asked regarding age, marital status, etc. Should the student answer "yes" to any of the questions in step three he/she will be considered to be an independent student and the parental information will not be considered in determining the student's expected family contribution (EFC).

If the student does not meet any of the criteria mentioned in step three on the FAFSA, the student will be considered dependent. In this instance the student's parent's income and asset information must be entered into the FAFSA.

Tuition Installment Payment Plan

Students may wish to pay their balance by using the college's installment payment plan. This can be accomplished by entering into a Bill Pay Agreement and Payment Schedule. According to this

arrangement, the student must pay 25% of their total bill at registration or by the first day of classes. The remainder of the bill is then due in three (3) equal payments set on specified dates (according to the agreement) to ensure that the total bill is paid prior to final exams.

The Verification Process

According to Department of Education Policy, any student that applies for Financial Aid may be selected for the verification process. If selected, a student is not eligible to receive any financial aid until the required documentation has been provided and the verification process has been completed.

- Students will be notified by the Office of Financial Aid (in person, by email or U.S. Mail) if they have been selected for verification.
- Once a student is selected for verification, they must turn in the requested documentation as soon as possible to the Financial Aid Office at the college. All verification must be completed before any aid will be awarded. The deadline to complete verification will be no later than the middle of the semester in which the paperwork has been requested. If the verification paperwork is not completed in a timely manner, the student may be required to either stop attending class and/or pay their tuition bill in full.
- Students who have been selected for the verification process must submit copies all requested paperwork. This may include worksheets provided by the Financial Aid Office, the student's (or parent's) W-2 forms & Official Tax Transcripts from the IRS.
- Once the verification paperwork has been submitted, the Financial Aid Office will review the documentation and make any needed corrections to the students ISIR. This will possibly generate a new FAFSA transaction which may alter the EFC and/or award amount.
- Should the students Estimated Family Contribution (EFC) number and/or Award Amount changes the adjustments will be visible to the student through their student portal in the Sonis system. A revised Award Letter will be generated for the student's approval. The student will be able to access the revisions through the Sonis system.
- Should any overpayment be discovered due to the verification process, it will immediately be reported to the Department of Education for correction. This may result in the student being liable to repay the overage amount.

Types of Financial Aid

Grants, loans, and scholarships are available. Most of these are based on need and are determined by the FAFSA. The amount of the aid offered is determined by calculations from the Department of Education.

Federal Pell Grant:

Federal Pell Grant is a grant awarded to all students who have not yet earned a Bachelor's Degree and qualify according to the Department of Education calculations. The FAFSA and any requested verification paperwork is required to qualify for the Pell Grant. Once the EFC is determined through the FAFSA, student's who fall within the EFC range provided by the Department of Education will be awarded Pell Grant according to the limits set out by the government. Students who are eligible for Pell Grant funds may receive a book voucher through eCampus.

Tennessee Student Assistance Award (T.S.A.A.):

Any Tennessee resident who is enrolled at least half-time or will be enrolled at least half-time as an undergraduate student has the potential to qualify for this grant by completing the FAFSA before the deadline set by the State of Tennessee and by meeting the EFC requirements. (Both the deadline and EFC requirements can vary from year to year but typically the EFC cap is around 2100 and the deadline is February 1st of each year to complete the FAFSA.) Eligibility is determined by the Tennessee Student Assistance Corporation.

Tennessee Lottery Scholarship (T.E.L.S.):

The Tennessee Lottery Scholarship is awarded by the Tennessee Student Assistance Corporation (T.S.A.C.) to eligible students leaving high school. This award is merit based and does not have a need based additional component (Lottery Access Grant) for additional funding. In addition, the Lottery Scholarship has a non-traditional award that is based on a combination of merit and need for students who are over 25. Please refer to T.S.A.C.'s website for full eligibility requirements (<http://www.tn.gov/CollegePays/>).

Tennessee Promise:

The Tennessee Promise Scholarship is awarded by the Tennessee Student Assistance Corporation (T.S.A.C.) to eligible students leaving high school. Tennessee Promise is both a scholarship and mentoring program focused on increasing the number of students that attend college in our state. It provides students a last-dollar scholarship, meaning the scholarship will cover tuition and fees not covered by the Pell grant, the HOPE scholarship, or state student assistance funds. Please refer to T.S.A.C.'s website for full eligibility requirements (<http://www.tn.gov/CollegePays/>).

Veterans Administration:

John A. Gupton College is approved by the Tennessee Higher Education Commission to receive educational benefits. The student must submit their application through the VA and provide copies of all necessary paperwork to the Office of Financial Aid for certification.

Vocational Rehabilitation:

Students must contact their local vocational rehabilitation office to arrange an interview to determine eligibility.

Student Loans

For all students (and their parents) who choose to use loans through the Stafford Direct Loan Program will have said loan information submitted to the National Student Loan Data System (NSLDS) as required by the Department of Education. This loan information will be accessible by guaranty agencies, lenders, and institutions that are determined by the Department of Education to be authorized users of the data system.

Direct Stafford Loans: Subsidized Loans:

Subsidized Loans are considered a need based form of aid. They do not collect interest while the student is in school or during their grace period. They are available to both dependent and independent students. The maximum loan amount available to students is as follows:

\$3,500 for grade level 1 (per award year)
\$4,500 for grade level 2 (per award year)

Direct Stafford Loans: Unsubsidized Loans:

Unsubsidized loans are not considered a need based form of aid. These loans, while they are at a set low interest rate, do begin to accrue interest from the day they are released from the lender. Students have the option to pay on this interest while they are in school, or they can opt to allow the interest to capitalize once they go into full repayment. The typical loan maximums are as follows:

\$2,000 for dependent students (per award year)
\$6,000 for independent students (per award year)

Parent Plus Loans:

Parents of dependent students may find that they need additional assistance in paying for their child's education. In this instance the Parent Plus Loan is available. Parents may borrow up to the amount of the students cost of attendance, less other financial aid per award year (2 semesters). Repayment of the Plus Loan typically begins 60 days after the last disbursement of the loan. The approval for the Plus Loans and the interest rates for the loans are based on the parent's credit.

General Stafford Loan Information

- Student Loans are defined as money borrowed for educationally related expenses.
- Stafford Loans are guaranteed by the U.S. Department of Education.
- To qualify for Stafford Student Loans the student must:
 - Be enrolled at least half-time (6 credit hours)
 - Maintain Satisfactory Academic Progress as stated in the college catalog.
 - Must complete the FAFSA as stated in the college catalog.

Loan Disbursement Policy

All Loan funds will be disbursed in two disbursements per semester. The first disbursements each semester for returning students will begin to be processed within the first two weeks of the term. The first disbursement for new students will not begin processing until the 30th day of class. The second disbursements for all students will begin to be processed at the calendar midpoint between the first and last days of the semester.

Students with a credit balance on their account may come by the Office of Financial Aid anytime after the funds have been applied to their ledger to request a refund.

**Please note, there is a processing time for all funds that come into the college. The college will have your funds on your ledger within 3 days of receiving the funds from the original source. It often takes several days for the college to receive the funds after the certification process begins with the Financial Aid Office. **

Loan Interest Rates and Repayment

The interest rates for both Subsidized and Unsubsidized Stafford Loans are set out by the Federal Government as follows:

- Currently Stafford Loans disbursed after July 1, 2017 and before July 1, 2018 are at 4.45% interest.

Full repayment begins six months after one of the following three events occur:

- The student graduates college
- The student withdraws from college
- The student drops below half time enrollment (6 credit hours).

Deferments are available to students who wish to keep their Stafford Loans in a postponed state while they are attending college. To qualify for a deferment a student must be enrolled at least half time in an eligible institution. To place loans in the deferment status a student must complete a Deferment Form, have the Director of Financial Aid certify the form, then submit it to the lender(s) for processing.

- While the deferment form is in process the student who is already in the repayment status, must continue making payments until the lender confirms the deferment has been approved. If payments are not kept current the student could potentially enter the default status at which point he/she would become in-eligible for aid.

To check your loan interest rates, full loan history and repayment date, go to www.nslds.ed.gov.

To review a loan repayment calculator please go to www.studentloans.gov and follow the link for Repayment Plans & Calculators.

Students should always maintain good communication with the servicer assigned to them. Failing to make timely payments can result in a default status. A default status results in:

- denial of any further student aid
- the garnishment of wages
- seizing your federal tax return

Book Vouchers

Any student who is Pell Eligible will have the opportunity to request a Book Voucher to be used on the e*Campus website for textbooks pending the qualifications below are met. (Those not Pell eligible will not be permitted to request a book voucher.)

Pell and Subsidized Stafford Eligible Students Must:

- Be awarded Pell Grant or Subsidized Stafford.
- Have a credit balance on their student account after their bill is paid in full.
- Complete a book voucher agreement in the financial aid office.
- Understand that the student will be responsible for the cost of the books should any change in their financial aid status occur.
- Have all Financial Aid paperwork completed (Entrance Counseling, MPN, etc.).

In addition all returning financial aid students who may or may not have eligibility will be permitted to request a book voucher pending they meet the following criteria:

Non-Pell Eligible Students Must:

- Be a returning student in good standing with John A. Gupton College and have all Financial Aid paperwork completed.
- Have a credit balance on their student account after their bill is paid in full.
- Complete a book voucher agreement in the financial aid office.
- Understand that the student will be responsible for the cost of the books should any change in their financial aid status occur.

Know that if a book voucher is used to order text books, it is the students responsibility to deal directly with the e*Campus website for ordering books and dealing with returns. In addition, if the student withdraws before the college is reimbursed by the financial aid funds; the student is responsible for paying Gupton College back for the cost of the text books.

Satisfactory Academic Progress for Financial Aid

Federal Regulations require all college students maintain good progress toward receiving a degree in order to continue to have eligibility for Title IV financial aid programs. All semesters will be counted toward this progress regardless if the student did not receive aid in a prior semester.

According to Federal Regulations there are three main measurements reviewed at the end of each semester.

1.) GPA

Graduation requires a minimum of a 2.0 cumulative grade point average. All students must maintain a cumulative grade point average according to the graduated scale cited below:

- 1.50 by the end of the first semester
- 1.75 by the end of the second semester
- 2.0 by the end of the third semester

2.) Pass Rate

It is required that all students must make ongoing progress toward their degree. This is accomplished by passing a minimum of 67% of all classes attempted cumulatively. This will be reviewed at the end of each term.

*Any grades that are counted toward your total hours attempted will be reviewed in calculating your Pass Rate. For example, a withdrawal after the allowed withdrawal period will count against the hours attempted and can affect your time frame and pass rate.

3.) Maximum Time Frame

By law, students can only receive aid up until he/she reaches 150% of the hours required to complete the degree being sought. The Associate of Arts Degree program is 62 hours in length; therefore a student can only receive aid for a maximum of 93 total attempted credit hours. The Associate of Applied Science program is 60 hours in length; therefore a student can only receive aid for a maximum of 90 total attempted credit hours. This component is reviewed independently and there is no probationary period. Students will be notified when they have one semester of eligibility remaining.

* Any grades that are counted toward your total hours attempted will be reviewed in calculating your Maximum Time Frame. For example, a withdrawal after the allowed withdrawal period will count against the hours attempted and can affect your time frame and pass rate.

What counts in the SAP calculations for Financial Aid?

- Transfer Credit: If a student has previous college coursework that is reviewed and accepted by Gupton College as credits toward earning your degree from Gupton College, those credits will be counted toward your Pass Rate. The grades earned will not count however toward your GPA at Gupton.
- Withdrawals: When a student withdraws from a course, the transcript will show the student has 0 attempted hours for the course and the course will not be counted negatively against the student's GPA. However, any course that is withdrawn from will still be counted in the attempted hours and will affect the student's Pass Rate. For example: A student enrolls for 16 hours but has to drop down to 10 hours in the semester. This will give the student a 63% Pass Rate for the term and he/she will be placed on Financial Aid Warning for the following term.
- Repeat Coursework: If a student receives an "F" in a course and later repeats the class, the higher grade will replace the "F" on the transcript to be counted for the GPA calculation. The hours attempted will be counted toward the Pass Rate every time the course is taken.
- Incomplete Course Grades: The grade of "I" is only issued for incomplete work due to extenuating circumstances. The "I" grade is conditional and must be removed within the first two weeks of the succeeding semester or it will automatically convert to an "F". The attempted hours for any course the receives an "I" will be counted toward the Pass Rate for the term. The GPA will be determined as soon as the "I" is rectified either by the completion of the coursework or by the conversion to an "F".

Repercussions for not meeting the requirements:

A.) Students who do not meet the above listed requirements will first be placed on Financial Aid Warning. (This was previously known as Financial Aid Probation). Any student who is placed on Financial Aid Warning will still be eligible to receive financial aid for one additional semester in an attempt to repair their progress.

B.) After the Warning period has ended, if the student still does not meet all three requirements, he/she will be placed on Financial Aid Probation (suspension). Students placed on Financial Aid Probation (suspension) cannot receive any Title IV Federal (or State) Financial Aid until they repair their Satisfactory Academic Progress status by enrolling for classes at their own expense or successfully appealing their probation.

Due to the nature of the program at Gupton, we do not create Academic Plans during the Probation (suspension) time, a student must either pay out of pocket until he/she meets the SAP requirements or submit and have an appeal approved.

** Once a student feels that they have met all three Satisfactory Academic Progress requirements listed above, it is the student's responsibility to contact the Financial Aid Office for review and possible reinstatement of their Financial Aid. **

Financial Aid Appeals Process:

When a student has been placed on Financial Aid Probation and their aid has been suspended, the student has the right to appeal the probation (suspension) if they experienced extenuating circumstances during the course of the term as listed below:

- Illness of the student or immediate family member.
- Death of an immediate family member.
- Extreme financial hardship causing excessive hours at work.
- Extraordinary circumstances that are beyond the students control that created a substantial hardship on the student.

** Please note: when completing appeal, the appeal will be reviewed by the appeal committee on a case by case basis. The appeal committee consists of the Director of Admissions, the Director of Funeral Service Education, and the Director of Mortuary Science. The President of the college has the right to over-rule an appeal decision. **

To complete a Financial Aid Probation (suspension) Appeal you must:

- 1.) Have not been approved for a Financial Aid Appeal previously. You can only have one term of aid on an approved appeal, beyond that you will no longer be allowed to appeal and so you will no longer have aid eligibility until you meet the Satisfactory Academic Progress grade and pass rate requirements.
- 2.) Contact the Office of Financial Aid
- 3.) Complete the Financial Aid Eligibility Appeal Form
- 4.) Provide all documentation to support your appeal
- 5.) Write a letter explaining what happened during the semester that caused you to be placed on Financial Aid Probation and what has changed to enable you to regain good standing.

Once the appeal documentation has been submitted it will be reviewed and generally a response is sent to the student within 3 business days. If the student has been placed on both Financial Aid Probation (suspension) and Academic Suspension, the student must complete their Financial Aid Appeal first, and then they can complete an Academic Appeal.

Regaining Financial Aid Eligibility

There are only two ways a student can regain the right to use Financial Aid after being placed on Financial Aid Probation (suspension).

- 1.) Submitting a Financial Aid Appeal and documentation that is approved by the Financial Aid Appeals Committee.
- 2.) Paying out of pocket for the student's enrollment until the student meets the required pass rate and grade point average.

****If a student is on both Financial Aid Probation (suspension) and Academic Suspension, the student can re-gain enrollment to the college by sitting out one semester for their Academic Suspension; but this does not qualify the student to re-gain their Financial Aid Standing. ****

Treatment of Aid Funds When a Student Withdraws (R2T4)

Students receiving Federal Aid - Any student that withdraws from classes that will either drop them below part time enrollment (six credit hours), or student who completely withdraw from enrollment at the college may be in a status of forfeiting their aid. According to the regulation (34CFR668.22) put out by the Department of Education, anytime a student alters their enrollment status prior to the end of the enrollment period their aid must be recalculated according to Department of Education Standards. In this recalculation, there is the possibility that some or all Title IV funds may have to be returned immediately to their original source. The calculation will be completed using the R2T4 web site provided by the Department of Education. This could result in the student owing tuition to the college out of pocket. Once this calculation has been completed the Office of Financial Aid will contact the student should any bill/refund be required.

Student receiving State Aid – Students meeting the 60% completion of the semester will keep all the State Aid received. If the student withdraws before 60% of the semester, then the students account will be cleared to a zero balance and all remaining funds will be returned to the State of Tennessee. This would include Lottery, Aspire, TSAA, and Tennessee Promise funds.

Any time a student is considering altering their enrollment status, it is highly advisable he/she stop by the Office of Financial Aid to discuss the potential impact on their aid before they change their enrollment.

Exit Counseling:

Any time a student becomes enrolled for less than six credit hours, and the student has used student loans, Exit Counseling will be required. Exit Counseling collects information about the students address, employment, and references. Exit Counseling also gives the students valuable information about the repayment process. The student will be contacted by email or U.S. Postal service and will be directed to complete the Exit Counseling on the web at www.studentloans.gov, or complete the paper version provided by the college.

Drug Free Communities Statement

This statement is distributed to all John A. Gupton College employees, including faculty, staff, and student in compliance with the provisions of the Drug Free Workplace Act of 1988 41(U.S.C. 701, et seq.) and the Drug Free Schools and Communities Act Amendments of 1989(20 U.S.C. 3171, et seq.).

Policy:

It is the policy of Gupton College to prohibit the illegal use, abuse, manufacturing, possession, sale, or distribution of alcoholic beverages, or any controlled substance, including stimulant, depressant, narcotic, hallucinogenic drug or substance, or marijuana on college owned, controlled, or temporarily leased property. Such use, sale or distribution is also prohibited during any college related activity including off-campus trips. All employees and students are subject to applicable federal, state, and local laws related to this matter. Additionally, any violation of this policy will result in disciplinary actions as set forth in the "Student Conduct" and "Disciplinary Sanctions" sections of the College Handbook.

Legal Sanctions:

Various federal, state and local statutes make it unlawful to manufacture, distribute, dispense, deliver, sell or possess with the intent to manufacture, distribute, dispense, deliver, or sell controlled substances.

The penalty imposed depends upon many factors which include the type and amount of controlled substance involved; the number of prior offenses, if any; whether death or serious bodily injury results from the use of such substance; and whether any crimes were committed in connection with the use of such substance. Possible maximum penalties for a first-time offender include imprisonment for any period of time up to a term of life imprisonment, a fine of up to 4 million dollars, supervised release, or any combination of the above. The sanctions are doubled when the offense involves either of the following:

- 1.) Distribution or possession at or near a school or college campus.
- 2.) Distribution to persons under 21 years of age (repeat offenders may be punished to a greater extent as provided by statutes). Further, a civil penalty of up to \$10,000 may be assessed for simple possession of "Personal use amounts" of certain specified substances under Federal Law.

Under State Law, the offense of possession or casual exchange is punishable as a Class A misdemeanor, if there is an exchange between the minor and an adult at least two years the minor's senior, and the adult knows that the person is a minor, the offense is classified as a felony, as provided in T.C.A. 39-17-417 (21 U.S.C. 001, et seq.).

It is unlawful for any person under the age of 21 to buy, possess, transport, or consume alcoholic beverages, wine or beer. Such offenses are classified as Class A misdemeanors punishable by imprisonment for not more than 11 months and 29 days, or a fine of not more than \$25,000, or both (T.C.A. 1-2-113, 57-5-301). Furthermore, it is an offense to provide alcoholic beverage to any person under the age of 21. Such an offense is classified as a Class A misdemeanor (T.C.A. 39-15-404). The offense of public intoxication is a Class C misdemeanor and is punishable by imprisonment of not more than 30 days or a fine of not more than \$50, or both (T.C.A. 39-17-310).

Institutional Sanctions

Gupton College will impose the appropriate sanctions on any employee or student who fails to comply with the terms of this policy.

Employees: As a condition of employment, each employee, including student employees, must abide by the terms of this policy and must notify the institution of any criminal drug status conviction for a violation occurring in a workplace no later than five days after a conviction. A conviction includes a finding of guilty, a plea of nolo contendere, or imposition of a sentence by any state or federal judicial body.

Possible disciplinary sanctions for failure to comply with policy, including failure to notify of conviction may include one or more of the following:

- 1.) Termination
- 2.) Suspension
- 3.) Mandatory participation in and satisfactory completion of a drug/alcohol abuse program
- 4.) Recommendation for professional counseling
- 5.) Referral for prosecution
- 6.) Letter of warning
- 7.) Probation

Students: Possible disciplinary sanctions for failure to comply with the terms of this policy may include one or more of the following:

- 1.) Expulsion
- 2.) Suspension
- 3.) Mandatory participation in and satisfactory completion of a drug/alcohol program
- 4.) Referral for prosecution
- 5.) Probation
- 6.) Warning
- 7.) Reprimand

Financial Aid Complaint Procedure

The Financial Aid Complaint Procedure is found in the John A. Gupton College Student Handbook. The procedure allows for both informal and formal complaints as well as an appeals process.