Montefiore | School of Nursing

2025

OFFICE OF FINANCIAL AID
POLICIES AND PROCEDURES MANUAL

Montefiore School of Nursing
PPM: Dev.
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Montefiore School of Nursing
Office of Financial Aid
POLICIES & PROCEDURES MANUAL

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INTRODUCTION

Federal regulations mandate that institutions have written policies and procedures. Beyond the federal requirement, there are many benefits to having a written document outlining the Office of Financial Aid policies and procedures:

- For distribution to appropriate others outside the Office of Financial Aid for the purpose of informing and fostering an understanding of the complexity and operation of the Office of Financial Aid:

- For the Office of Financial Aid staff as a referral guide to assist in maintaining consistency in the problem-solving process; and

- As an important component of a comprehensive training program at any institution, the policy and procedures manual is a living document with continuous updates. This manual is the most up-to-date as stated on the cover. However, revisions are to be made no less than once a year depending on new or updated regulations or institutional processes.

STATEMENT OF PURPOSE

The purpose of this document is to record policies and procedures surrounding the delivery of financial aid at Montefiore School of Nursing (MSON).

THIS MANUAL

- Provides the financial aid staff with current policies and procedures surrounding federal, state and institutional programs.
- Provides each staff member with the general responsibilities of the total staff and the office's relationship to other departments/divisions of the school.
- Provides each staff member with general office procedures ensuring that similar situations would be handled consistently.
- Provides quick reference to various programs, problems, forms, rules, and regulations.
- Provides a clear understanding of policy, authority, and responsibility in matters relating to operational practices.
- Provides orientation and training materials for new personnel.

PHILOSOPHY

We believe that a consistent and equitable approach to the awarding of financial aid will enable students to attend Montefiore School of Nursing who would not otherwise have the financial resources to enroll. It, therefore, encourages a student population which is culturally, economically, socially and geographically diversified.

GOALS

The primary goal of the Office of Financial Aid at is to provide financial means by which a student can continue his/her education. The financial aid programs at are administered according to the following principles:

- The primary responsibility for financing education lies with the student and his/her family. When the total resources they can provide do not meet their educational expenses, will guide students and assist them in seeking alternate funds for their post-secondary education.
- Interested individuals will be made aware throughout the year of financial aid opportunities. A student must submit a FAFSA application each year in which he or she expects to be considered for financial aid.
- A confidential financial aid package will be developed and offered to the student based on individual need and circumstances, but without regard to age, sex, race, color, religion, national origin or handicap.
- Planning/counseling sessions are important and help students plan for the most efficient use of financial aid and the student's resources for education. They are held on an as-needed basis with any student.
- The Office of Student Financial Aid at MSON operates within federal and state guidelines and other standards of individual aid programs.

FINANCIAL AID CODE OF CONDUCT

This code of conduct is intended to ensure that the relationships between providers of education loans and other forms of financial aid to students of Montefiore School of Nursing (MSON) and its representatives with whom we deal with are free from all conflicts of interest, actual and perceived. Students of or, in appropriate cases, their parents, shall be the sole beneficiaries of all forms of financial aid. The Office of Financial Aid at Montefiore School of Nursing in association with the National Association of Student Financial Aid Administrators. We abide by NASFAA's Code of Conduct for Institutional Financial Aid Professionals which states that an institutional financial aid professional is expected to always maintain exemplary standards of professional conduct in

all aspects of carrying out his or her responsibilities, specifically including all dealings with any entities involved in any manner in student financial aid, regardless of whether such entities are involved in a government sponsored, subsidized, or regulated activity. In doing so, the Office of Financial Aid administration and staff, **executive and administrative staff, employees, and agents of Montefiore School of Nursing** is bound by the Principles of Ethics.

PRINCIPLES OF ETHICS

- Prohibits employees of the Office of Financial Aid (or employee or agent who otherwise has responsibilities with respect to education loans) from recommending external lenders to students or their parents. Does not maintain a preferred lender list;

- Prohibits employees of the Office of Financial Aid (or employee or agent who otherwise has responsibilities with respect to education loans) from refusing to process loan applications through any lender a student or parent chooses;

- Prohibits revenue-sharing - an arrangement between the institution (officers, employees, or agents) and a lender under which the lender makes Title IV loans to students attending the institution (or to the families of those students);

- Prohibits employees of the Office of Financial Aid (or employee or agent who otherwise has responsibilities with respect to education loans) from soliciting or receiving any gift worth more than nominal value from a lender, guaranty agency or loan servicer;

- Prohibits employees of the Office of Financial Aid(or employee or agent who otherwise has responsibilities with respect to education loans) to accept from a lender, or an affiliate of any lender, any fee, payment, or other financial benefit as compensation for any type of consulting arrangement or contract to provide services to or on behalf of a lender relating to education loans;

- Prohibits the institution from steering borrowers to particular lenders or delaying loan certifications. For any first-time borrower, the institution may not assign, through the award packaging or other methods, the borrower's loan to a particular lender. In addition, may not refuse to certify, or delay the certification of any loan based on the borrower's selection of a particular lender or guaranty agency;

- Prohibits offers of funds for private loans may not request or accept from any lender, any offer of funds or funds for private loans, including funds for an opportunity pool loan, to students in exchange for providing concessions or promises to the lender for a specific number of Title IV loans made, insured, or guaranteed, a specific loan volume, or a preferred lender arrangement.

- Prohibits the institution from requesting or accepting from any lender any assistance with call center staffing or financial aid staffing, except that a lender may provide professional development training, educational counseling materials (as long as the materials identify the lender that

assisted in preparing the materials), or staffing services on a short-term, nonrecurring basis during emergencies or disaster; and

- Prohibits employees of the Office of Student Financial Aid & Scholarships, (or any employee or agent who otherwise has responsibilities with respect to education loans) who serves on an advisory board, commission, or group established by a lender or guarantor (or a group of lenders or guarantors) from receiving anything of value from the lender, guarantor, or group, except for reimbursement for reasonable expenses incurred by the employee for serving on the board.

- Disclose to the administration of Montefiore School of Nursing any involvement with or interest in any entity involved in any aspect of student financial aid.

FINANCIAL AID REFERENCE DOCUMENTS

There are many resource guides that assist the Office of Financial Aid staff. These citations may be found in the Office of Financial Aid either in hard copy or electronic versions or at www. IFAP.ed.gov and are available to staff members. The documents which are used to determine students' eligibility for financial aid include current regulations published in the Federal Register, Department of Education guides (such as the Federal Student Financial Aid Handbook, Verification Guide, formula books, and Audit Guide), Dear Partner Letters, financial aid legislation and other laws or regulations that impact student aid. Procedures are also furnished by outside agencies in dealing with their funding and/or administration.

This Policies and Procedures Manual does not include all details of the administration of financial aid programs, and the related references should be used for in-depth clarity.

I.   Financial Aid Office Contact Information

Location	Montefiore School of Nursing 4th Floor Room 403
Hours	Monday-Thursday, 8:30am–Noon & 2 pm–5 pm Wednesday 6-8pm Friday (By Appointment Only)
General Office Number	914-361-6081
Email	msonstufin@montefiore.org
Fax Number	914-664-8106
Web Address	www.montefiorenewrochelle.org/school-of-nursing

The Financial Aid Office Staff

At Montefiore School of Nursing, we are committed to the care for each student individually, devoted to attend to each need as promptly as possible, and determined to be a beacon of hope to those whose need is great. We will challenge students to seek the best in themselves, while we expect the best of ourselves. We are here to serve the students so that they may serve others. We are the staff of the Office of Financial Aid; where students come first.

The Office of Financial Aid daily operations includes the processing of financial aid documents and correspondence, response to emails, phone calls, and faxes, as well as face-to-face communications with students, parents, co-workers, and other individuals that visit our office. We constantly strive to uphold MSON's mission statement in all that we do to ensure that every student is treated equally and helped in a timely and caring manner. As a Health Care Institution serving students from all different backgrounds, we understand that we must set an example for all of the individuals that we come in contact with to ensure that we are upholding these values.

SECTION 2: ADMINISTRATIVE ORGANIZATION & OFFICE MANAGEMENT

2.1 Office of Financial Aid Contact Information

Location   Montefiore School of Nursing 4th Floor Room 403

Hours   Monday-Thursday, 9am–Noon & 2 pm–5 pm
                                         Wednesday 6-8pm
                                         Friday (By Appointment Only)

General Office Number   914-361-6081

Email   msonstufin@montefiore.org

Fax Number   914-664-8106

Web Address   www.montefiorenewrochelle.org/school-of-nursing

2.2 General Office of Financial Aid Administration

2.2.1 Appointments with Staff

Students and parents are encouraged to make appointments with staff to address concerns. If a student or parent requests an appointment with a staff member, an appointment is arranged. We also make every effort to address any concerns and answer any questions via email, phone or fax.

2.2.2 Treatment of Correspondence/Forms

We correspond with students, parents, co-workers and other individuals via phone, email, fax, and face-to-face communication. Our main phone number is 914-361-6081, our fax number is 914-664-8106, our email address is msonstufin@montefiore.org, and our office is located in the Montefiore School of Nursing on the 4th Floor Room 403.

The Front Desk receives documents from students, parents, and other departments. All incoming documents are date-stamped and passed on to the appropriate financial aid staff member. Once the documents are complete, it is then scanned and saved electronically in EDExpress, and the documents are placed in the student's file.

2.2.3 Confidentiality of Student Records

To protect the privacy of students and families, federal law sets conditions on the disclosure of personal information from records kept by schools that participate in the financial aid programs. The relevant law is the Family Educational Rights Act of 1974. FERPA restrictions on disclosure of records that are created and maintained by campus law enforcement units.

Department regulations set limits on the disclosure of personally identifiable information from school records, define the responsibilities of the school, and identify the rights of the student to review the records and request a change to the records.

Except under one of the conditions described below, a student must provide a signed and dated written consent before an education agency or school may disclose personally identifiable information from the student's records.
The written consent must: 1) State the purpose of the disclosure, 2) Specify the records that may be disclosed, 3) identify the party or class of parties to whom the disclosure may be made, 4) Be signed and dated.

2.3   Records Management & Retention

The school must keep comprehensive, accurate program and fiscal records related to its use of financial aid program funds. The importance of maintaining complete, accurate records cannot be overemphasized. Program and fiscal records must demonstrate the school is capable of meeting the administrative and fiscal requirements for participating in the financial aid programs. In addition, records must demonstrate proper administration of financial aid program funds and must show a clear audit trail for financial aid program expenditures. For example, records for each financial aid recipient must clearly show that the funds were disbursed in accordance with program regulations

A school must maintain all required records in a systematically organized manner. Unless a specific format is required, a school may keep required records in:

➢ Hard Copy

➢ Computer file

➢ Scanned file

➢ Records on CDs, discs, tapes, or other media

All record information, regardless of the format used, must be retrievable in a coherent hard copy format or in a media format acceptable to the Department.

Any documentation that contains a signature, seal, certification, or any other image or mark required to validate the authenticity of its information must be obtained in its original hard copy or in an imaged media format.

2.4 Information Sharing & the Family Educational Rights and Privacy Act

The Family Educational Rights and Privacy Act, as amended (FERPA), allows students at an institution of Higher Education to control outside access to their education records, including requests for information from their parents and other family members. Without a student's written consent, MSON may not disclose information from a student's education records to outside third parties except as provided under FERPA. You can provide a standing release allowing MSON to disclose information to other persons.

The FERPA form must be complete and submitted to the Registrar's Office.

If a student wishes their directory information not be made public, they must contact the Registrar's Office before the last day of late registration to request their information be withheld.

2.4.1 Authorization Consent Form

The written consent must:
- State the purpose of the disclosure;
- Specify the records that may be disclosed;
- Identify the party or class of parties to whom the disclosure may be made; and ☐ Be signed and dated.
- Identify and authenticate a particular person as the source of the consent; and
- Indicate that person's approval of the information contained in the consent an authorization form must be in the student's file prior to disclosing information.

SECTION 3: FINANCIAL AID PROGRAMS

3.1 Institutional Eligibility Requirements

To participate in the Title IV programs, schools must meet one of the following definitions of an eligible institution:

☐ Institution of higher education;

☐ Proprietary institution of higher education; or

☐ Postsecondary vocational institution.

As an institutional of higher education, MSON meets these criteria. The Office of Financial Aid maintains documentation that substantiates the school's institutional eligibility. Such documents might include, but are not limited to:

☐ Program Participation Agreement (PPA)

☐ Eligibility and Certification Approval Report (ECAR)

3.1.1   Program Eligibility

To qualify as an eligible institution, the school must offer at least one eligible program, and it is the school's responsibility to ensure a student is enrolled in an eligible program before disbursing Title IV aid. All programs offered by MSON lead to an associate's degree and are eligible for federal aid. MSON does not offer any programs that do not lead to a degree.

3.1.2   General Requirements - POLICIES AND PRACTICES GOVERNING STUDENT FINANCIAL AID

By signing the Award Letter, the student agrees to comply with the following policies regarding your financial aid award. Failure to meet the requirements may result in having to repay funds and being denied future financial aid.

1. The Student Financial Aid Office reserves the right on behalf of to review and cancel an award at any time because of changes in financial or academic status, or change of academic program. If an overpayment occurs, the student is responsible for reimbursing the school.

2. Recipients of financial assistance from MUST notify the Student Financial Aid Office of any grants, scholarships, loans, etc., extended to them from sources outside the school, as these may reduce the financial aid award. Also, any change in name, address or student status must be reported.

3. Most financial aid awards are based on a student's financial need. Information that is reported on the FAFSA is used to calculate an Expected Family Contribution (EFC). Financial aid awards are calculated based on the following equation: Cost of Attendance (COA) – EFC – EFA (Estimated financial assistance) = Financial Need. COA figures are available in the financial aid office. EFA can include scholarships or other resources which are also subtracted from the COA to determine need.

4. Financial aid is awarded contingent upon enrollment in an eligible program and maintaining satisfactory academic progress. The school catalog provides information about these policies.

5. It is MSON's policy to disburse financial aid each term. In no instance will a portion of the award be disbursed to the student prior to registration. Refer to the school catalog for registration information.

6. Any commitment of federal/state/institutional funds is tentative and contingent upon subsequent Congressional appropriation and actual receipt of the funds by Montefiore School of Nursing.

7. New applications for financial aid are required and should be submitted as soon after October 1st as possible for the following school year. Students are responsible for securing and completing the necessary applications online.

8. Concurrent Enrollment: Students enrolled in courses at other colleges while also enrolled at MSON must inform the Financial Aid Office. Students may receive financial aid at only one school in a given term.

9. Federal Financial Aid Return of Title IV Funds Policy: If a student receives Title IV aid (federal student loans, Pell Grant, SEOG) and withdraws prior to or at the 60% point of the term, repayment of a portion of those funds is required.

10. Federal Pell Grant: Pell Grant awards are based on the student's EFC as determined by the FAFSA. After a student is awarded and accepts his/her awards, the Pell Grant is disbursed directly to the student's account each term. Students' tuition and fees are charged to their student account, and any excess funds are issued to the student according to the choice made on the Fund Disbursement Authorization Form (the credit balance authorization form). If an overpayment occurs, the student is responsible for reimbursing the school.

11. Federal Supplemental Educational Opportunity Grant (SEOG): Funds are very limited and are awarded to Pell-eligible students who show financial need as indicated on the Student Aid Report (SAR). Priority is given to those students with 0 EFC. Disbursement will be made to the student's account.

12. Federal Work Study (FWS): If the student's offer of financial assistance includes employment under the Federal Work Study Program (FWSP), the amount shown for this category is the amount of money the student may expect to earn during the academic year as a result of work performed.

13. Federal Direct Student Loans: Federal Direct Student Loan eligibility is determined by the FAFSA. All students are awarded the maximum that they are eligible for in the current academic year and are instructed to accept or decline their awards. Effective 7/1/13 there is a maximum eligibility period to receive Direct Subsidized Loans. In general, a student may not receive Direct Subsidized Loans for more than 150% of the published length of their program. This is called their "maximum eligibility period." After a student is awarded and accepts his/her awards, the student loan is disbursed directly to the student's account each term. Students' tuition and fees are charged to their student account, and any excess funds are issued to the student according to the choice made on the Fund Disbursement Authorization Form. The student will be notified in writing within 30 days of each loan disbursement, of the dollar amount disbursed and of their right to cancel. If an overpayment occurs, the student is responsible for reimbursing the school.

14. Federal Direct Parent PLUS Loans: PLUS Loan eligibility is determined by the FAFSA. Biological or Adoptive Parents or the student's stepparent, if the biological or adoptive parent remarried at the time of application, of dependent students are eligible to apply. Applications are available in the Financial Aid Office. After a student is awarded and accepts his/her awards, the parent loan is disbursed directly to the student's account each term. Tuition and fees are charged to the student's account, and any excess funds are issued to the student according to the choice made on the Fund Request and Check Release Form. The parent will be notified in writing within 30 days of each net loan disbursement and of their right to cancel. If a Parent Plus loan request is declined due to credit or other documented reasons, the student will be awarded an additional $4,000 per academic year in unsubsidized funds.

15. Federal   Loans: Federal loan funds are reserved for students with exceptional financial need. Pell grant eligibility is determined by the FAFSA, and the student is awarded based on personal need with an award year maximum of $6096. The recipient fills out the application, entrance interview, statement of rights and responsibilities and promissory note before funds are disbursed to his/her student account. The student will be notified in writing no earlier than 30 days before, and no later than 30 days after, crediting the borrower's account. The notification will include each loan disbursement of the dollar amount disbursed and of their right to cancel.

16. Scholarships: Once a student has started school, scholarships will be disbursed into the student account according to scholarship guidelines.

3.1.3   Consortium Agreements
3.1.3.1   General

On a case by case bases MSON may approve consortium agreement with other institutions outside of the standing consortium with Westchester Community College. However, again this will only be approved on a case by case basis. Approval can be obtained from The Financial Aid Officer, Registrar or the Dean of the Montefiore School of Nursing (MSON).

A Financial Aid Consortium Agreement makes it possible for a matriculated student from Montefiore School of Nursing to attend another post-secondary institution for one or two semesters during an academic year and to receive Title IV and Federal Direct Student Loan funds during that period of enrollment.

To enter into a consortium agreement, the Host Institution must confirm that it is eligible to participate in U.S. Federal Student Aid (FSA) Programs. If the Host Institution is an ineligible institution, a contractual agreement is required.

Montefiore School of Nursing is considered the Home Institution because it will confer the student's, Associates Degree. The other school of attendance is designated as the Host Institution. A valid consortium agreement requires the cooperation of Montefiore School of Nursing and the Host Institution for students to receive Title IV and Federal

Direct Student Loan assistance determined and disbursed through Montefiore School of Nursing.

The following guidelines and conditions govern the use of this agreement and all of these conditions must be met before the disbursement of financial aid funds can be made:

1. The student applying for study at the Host Institution must complete all of the required applications and forms necessary to receive financial aid. This includes, but is not limited to, a Free Application for Federal Student Aid (FAFSA), and Parent/s' and Student's completed income tax returns, if applicable.

2. The student must obtain a schedule of courses the student plans to take at the host institution for verification that credit will transfer to the home institution toward his/her Associate in Science Degree (in Nursing) at Montefiore School of Nursing.

3. The student must forward to the Host Institution a copy of the Montefiore School of Nursing Financial Aid Consortium Agreement along with the Enrollment and Cost of Attendance Form. If the Host Institution agrees to enter into such an agreement, then its Financial Aid Office and Registrar must complete the applicable sections and return them to   Montefiore School of Nursing.

4. Montefiore School of Nursing cannot make disbursements to the student's Montefiore School of Nursing account until it receives the required paperwork for the student from the Host Institution. Disbursements may not be made unless the student has completed the appropriate forms to determine the student's eligibility for Title IV and Federal Direct Student Loan Assistance.

5. All of the forms required for a Financial Aid Consortium Agreement must be completed and on file in Montefiore School of Nursing before the last day of the semester in which the student is studying. This day will be no later than the last day of the semester according to the Montefiore School of Nursing's academic calendar. Students will not be eligible for financial aid at the Host Institution for a particular semester if the Financial Aid Consortium Agreement is received at the Home Institution after the last day of the semester.

6. Under this Financial Aid Consortium Agreement, students who are eligible will be packaged for state aid, Federal Pell Grants, Federal Direct Student Loans and Federal Direct PLUS Loans.

7. The student is responsible for payment of all charges at the Host Institution.

8. If the Host Institution does not agree to enter into a Financial Aid Consortium Agreement with Montefiore School of Nursing, the student will be ineligible for award of financial aid for any courses taken at the Host Institution.

3.1.3.2   Westchester Community College
Montefiore School of Nursing
Financial Aid Consortium Agreement

- This agreement is between Westchester Community College (Host Institution) and Montefiore School of Nursing (Home Institution). The parties agree that this consortium agreement applies to the financial aid eligible students concurrently enrolled at both the Home and Host Institutions.

- This consortium agreement is a blanket consortium agreement and covers students who are regular students enrolled in the Associate in Science Degree in Nursing Program (ASN Program) at Montefiore School of Nursing. The ASN Program is an eligible program as defined by the U.S. Department of Education in 34 C.F.R. § 668.8.

- The Home Institution is Montefiore School of Nursing located at 53 Valentine Street, Mount Vernon, New York 10550. Montefiore School of Nursing will grant enrolled students the applicable degree upon the satisfactory completion of the program. The Home Institution is responsible for all awarding and adjusting and reporting of Federal Title IV aid and all applicable State of New York financial aid programs, including the following:

  - Determining enrollment status and cost of attendance by taking into account all credit hours that apply to the ASN Program in which the student enrolls at each institution;

  - Calculating, awarding and disbursing federal, state, outside or private aid and any other financial aid in compliance with all applicable laws, regulations and guidelines. This includes employer or other third-party reimbursement.

  - Ensuring that federal financial aid is only disbursed for courses taken at the Host Institution that are applicable to the ASN Program.

  - Timely processing of student credit balance refunds.

  - Monitoring student eligibility, including enrollment, attendance and satisfactory academic progress.

  - Reporting student enrollment to National Student Loan Data System (NSLDS).

  - Refunding aid and performing R2T4 calculations as appropriate and necessary.

  - Reporting to IPEDS and meeting all other federal and state reporting requirements.

  - Processing and monitoring military and veterans' awards and funding.

  - Retaining records in accordance with all applicable federal, state and accrediting agency requirements, including all records regarding the eligibility of students for and receipt of Title IV funds.

- Providing appropriate consumer information to enrolled and prospective students

concerning the portion of the ASN program provided through this consortium agreement including:

- The portion of the educational program that each institution is providing;

- The institution that is granting the degree;

- The name and location of both institutions;

- The method of delivery of the portion of the educational program that both institutions are providing; and

- Estimated additional costs students may incur as the result of enrolling in an educational program that is provided, in part, under this consortium agreement.

- The Home Institution is also responsible for the following:

- Providing necessary student support services for the courses offered by the Home Institution and for the ASN program.

- Responding to student grievances regarding the ASN program through its complaint process.

- In accordance with its established procedures and usual mechanism of review, the Home Institution has found that the Host Institution's academic standards are equivalent in quality to its own and that the instruction provided by the Host Institution is an acceptable substitute for its own and consistent with its mission, objectives, and program outcomes. The Home Institution will award credit to a student who earns a grade of "C+" or better in a course offered by the Host Institution that fulfills the course requirements of the ASN Program. For the avoidance of doubt, each party will maintain ultimate control over the courses offered by that party and each party is responsible for outcomes assessment for the courses it offers.

- The Host Institution is Westchester Community College located at 75 Grasslands Road, Valhalla, New York, 10595. The Host Institution is responsible for the following:

- Providing enrollment, withdrawal, final course grades and other information in a timely manner for all students concurrently enrolled under this consortium agreement to the Financial Aid Administrator at the Montefiore School of Nursing.

- Billing students for Host Institution course enrollment charges. Students will be billed separately by the two institutions for applicable enrollment.

- Providing necessary student support services for the courses offered by the Host Institution.

- Responding to student grievances regarding its courses through its complaint procedure.

- If there exists any community-based or other funding that is based upon enrollment at the Host Institution, including employer or other third-party reimbursement, the Host Institution will promptly notify Montefiore School of Nursing.
- The Host Institution will not disburse any Federal, state or institutional aid to the student for the period specified by this Consortium Agreement. This includes the Federal Pell Grant Program, Federal SEOG, Federal Work-Study, TEACH Grant, IASG, Federal Direct Stafford Loans, Federal PLUS Loans, all state grant and scholarship programs, and any institutional aid programs.

- Both the Host and Home Institutions agree that Montefiore School of Nursing will include course enrollment at the Host Institution when reporting enrollment to NSLDS, disbursing aid and adjusting aid for the students enrolled concurrently at both institutions under this consortium agreement.

- Both the Host and Home Institutions agree to maintain all student records in compliance with the Family Education Rights and Privacy Act (FERPA) and any other applicable laws or regulations.

- The Home Institution and Host Institution agree that this agreement does not imply or extend ACEN accreditation to the Host Institution.

- The Host Institution agrees that it will seek the Home Institution's approval for any advertising, recruiting or promotional materials that refer to the Home Institution or the ASN program.

- The Host Institution, at its option, may require students to secure their enrollment by paying in full or establishing a payment plan.

- The Home Institution agrees that students who have outstanding balances at the Host Institution will not be allowed to continue under this consortium agreement.

- Questions regarding this agreement should be directed to the Financial Aid Office at either institution. In the event that one party breaches the agreement or there is a disagreement about the agreement, representatives of each party will meet to attempt to resolve the alleged breach or disagreement.

- The consortium agreement will be reviewed on a biennial basis and will continue until terminated by either party. In the event that either party decides to terminate the consortium agreement, the parties will cooperate to ensure that any active students are allowed to finish the current semester.

3.1.4   Administrative Capability

3.1.4.1   Lead Hospital Administration
(Forthcoming)

3.1.4.2   Montefiore School of Nursing

FINANCIAL AID ORGANIZATIONAL STRUCTURE

Vice President/Executive Director Montefiore School of Nursing

Dean, Montefiore School of Nursing

Financial Aid Administrator

In order to effectively and capably administer all financial aid programs, the Office of Financial Aid does the following:

- Designates a capable individual (Financial Aid Administrator for Financial Aid) to be responsible for administering and coordinating the institution's financial aid programs
- Uses an adequate number of qualified persons to administer the Title IV programs.
- Communicates to the individual designated as responsible for administering Title IV programs all the information received by any institutional office that impacts a student's Title IV eligibility.
- Notifies the Department of Education in a timely manner (typically within 10 days) of any changes in the institution's status or operations.

3.1.4.3   Separation of Duties

A school must ensure that its administrative procedures for the financial aid programs include an adequate system of internal checks and balances. This system, at a minimum, must separate the functions of authorizing payment and disbursing or delivering funds so that no one person or office exercises both functions for any student receiving financial aid funds. Small schools are not exempt from this requirement even though they may have limited staff. Individuals working in either authorization or disbursement may perform other functions as well, but not both authorization and disbursement. MSON complies with this policy as the Office of Financial Aid awards funds, but the Student Billing Office applies the funds to student accounts.

There is a clear and separate division of responsibility for the administration of financial aid programs between the Office of Financial Aid (OFA) and the Office of Business Affairs (BAO).

Financial aid is awarded and disbursed by batch processes run by the OFA staff or manually by financial aid staff in the OFA. The OFA staff is also responsible for reconciling awards on an individual student basis with the disbursement amounts reported to the Department of Education (ED) via the Common Origination and Disbursement (COD) agency.

The BAO is responsible for disbursing aid refunds to student accounts. They are also responsible for drawing down federal funds via the G5 system to cover the federal aid expenditures made to students. They only draw down funds when requested by the OFA staff.

Reconciliation of the federal Pell grant programs is performed monthly between the OFA and the BAO. Disbursement reports are submitted by OFA to ED via COD on a weekly basis. Requests to draw down grant funds via G5 are submitted to BAO weekly as well.

Requests to draw down federal Direct Loan funds via G5 are submitted to BAO at least weekly and often daily.

3.1.4.4 Records

A school must keep comprehensive, accurate program and fiscal records related to its use of financial aid program funds. The importance of maintaining complete, accurate records cannot be overemphasized.

Program and fiscal records must demonstrate that the school is capable of meeting the administrative and fiscal requirements for participating in the financial aid programs. In addition, records must demonstrate proper administration of financial aid program expenditures. For example, records for each financial aid recipient must clearly show that the student was eligible for the funds received and that the funds were disbursed in accordance with program regulations.

A school must establish and maintain on a current basis any application the school submitted for financial aid program funds. A school must also maintain on a current basis program records that document:
- The school's eligibility to participate in the financial aid programs,
- The financial aid eligibility of the school's programs of education,
- The school's administration of the financial aid programs,
- The school's financial responsibility,
- Information included in any application for financial aid program funds, and - The school's disbursement of financial aid program funds.

3.1.4.5 Electronic Processes

In order for a school to exchange data with the US Department of Education, it must have internet access through its network or an Internet Service Provider.

We use software called EDConnect to transmit the info to the ED. This is how we transmit and receive Pell and ISIR correction records (Origination & Payment). We are also electronically refunding loan money when a student withdraws/graduates.

3.1.4.6 Information Discrepancies

If MSON has conflicting information concerning a student's eligibility or has any reason to believe a student's application information is incorrect, we must resolve the discrepancies before disbursing financial aid funds. If we discover discrepancies after disbursing financial

aid funds, we must still reconcile the conflicting information and take appropriate action under the specific program requirements.

If the information is wrong on the ISIR, then corrections are necessary. A determination must be made if the ISIR is incorrect or if the submitted documentation is incorrect. If a correction needs to be made, the corrections would be made to the student's ISIR in FAA Access.

3.1.5   Reporting & Reconciliation

MSON complies with all required reporting and reconciliation of funds. The Accounting Office completes a monthly reconciliation of direct loans. All program funds are balanced at the end of the fiscal year. MSON does not drawdown Title IV funds until disbursement has been made to COD and the funds have been applied to the student's billing ledger. Because of this conservative process, every time the Accounting Office draws down funds they are able to insure that the amount of funds in G5 is available to them and that we are meeting all required timelines for reporting disbursements.

3.1.5.1   National Student Loan Data System

NSLDS stores the history of a student's Federal financial aid. To access the website, you must have an ID and a password. Once logged in, you can look up to see if they are in default, have a Pell overpayment, or see how much of their current FA award they have left to use.

When looking up a student on NSLDS, you see at the top of the screen a message that will tell you if the student is not on your transfer and monitor list. By clicking on that link, it will automatically take you to the "Add a Student" screen. You will need to enter the student name, SSN, date of birth, enrollment begin date (date student is starting school), and the date you wish to begin monitoring (usually the day you are adding the student to the list).

NSLDS will stop the monitoring progress on the 91st day after their enrollment begin date. Any changes to the student's record will be emailed on Thursday to the school. We must report overpayments or changes to previously submitted information to NSLDS within 30 days of the date we learn of the overpayment or change. If the grant overpayment is the result of the student's withdrawal and a return to Title IV calculation, you must contact the student within 30 days of determining that the student withdrew.

We only report unresolved overpayments if they're due to student error, don't report overpayments that are a result of school error. Instead, as discussed previously, you must use school funds to repay the overpayment. We must use the on-line NSLDS screens to report overpayment.

Once the overpayment is reported to NSLDS, the student's future output documents will show that the student has an overpayment. The Financial Aid History section of the SAR and ISIR will have information on the overpayment, including whether the student has made satisfactory repayment arrangements.

3.2   General Title IV Student Eligibility Requirements

A student must meet certain requirements to be eligible for financial aid. Those requirements include but are not limited to:

- Must be enrolled in a program of study and pursuing a degree/certificate/other credential
- Must meet Ability to Benefit requirements which means having a high school diploma or its recognized equivalent
- Must be a US citizen or eligible non-citizen
- Must be registered with Selective Service (if not exempt)
- Must not have had eligibility suspended or terminated due to a drug-related conviction.
- Must have a valid Social Security Number
- May not be in Default on a federal loan or have an overpayment on a federal grant.
- Must meet the requirements for SAP

The student must be enrolled at least half time to receive assistance from the Stafford and PLUS loan programs. The Pell grant program is awarded according to the Pell chart for that academic year and is based on a student's Cost of Attendance (COA), enrollment status and Expected Family Contribution (EFC).

The Office of Financial Aid verifies student aid history and aggregate loan amounts via NSLDS. Students receiving Title IV aid are required to file a FAFSA. No aid may be awarded until an accepted ISIR is on file and all required resolution and/or verification has been completed.

3.3   Federal Aid Programs in Which Institution Participates

The Institution will evaluate eligibility for the Pell, Federal Supplemental Educational Opportunity Grant(SEOG) (beginning year 2019-2020), Federal Work-Study (FWS), (beginning year 2019-2020) and state grants, as well as Federal Direct Stafford and alternative loans.

Upon receipt of ISIR, the Institution can move forward in determining the student's awards. Pell Grant is determined by the student's EFC. FSEOG is determined by the EFC as well as the date the student is awarded (depending on if FSEOG funding is still available). State grants are determined based on the student's financial information listed on the ISIR and the state of residency.
Subsidized loan eligibility is determined by COA – EFC – Financial Aid that Affects Need. Unsubsidized loan eligibility is calculated by COA – Financial Aid, taking into consideration the subsidized loan, within the loan limits. PLUS loan eligibility is calculated as COA – Financial Aid.

3.3.1   Federal Work-Study Program

The Federal Work-Study (FWS) Program provides part-time employment to students attending institutions of higher education who need the earnings to help meet their costs of postsecondary education and encourages students receiving FWS assistance to participate in community service activities.

FWS awards are based on need. Positions are limited, and there are more eligible applicants than positions. The Office of Financial Aid does not place students in jobs. Students must be interviewed and compete for positions. FWS jobs are usually found on

the Institution campus, but others are in community service positions. A complete FWS manual is available in the Office of Student Financial Aid & Scholarships.

3.3.2   Pell Grant

The Federal Pell Grant Program provides need-based grants to low-income undergraduate students and certain post-baccalaureate students to promote access to postsecondary education. Pell grants are awarded based on an annual Pell chart/table released by the Department of Education. Generally, Pell grants are based on a student's EFC, enrollment status and the COA of the school at which they are attending. Amounts are determined by the annual Pell chart/table. MSON uses Pell grant formula 1 in awarding.

3.3.3   FSEOG

3.3.3.1   FSEOG Awarding & Selection Policy

The Federal Supplemental Educational Opportunity Grant (FSEOG) is awarded to undergraduate Pell eligible students that are enrolled at least half-time and demonstrate exceptional financial need. Exceptional need is determined by the student's EFC. Under normal processing and consideration students with a $0 EFC are awarded first. If funds are available after all eligible $0 EFC students are awarded, or extenuating situations arise, Pell eligible students with a higher EFC could be considered.

3.3.4   Direct Student Loans

Subsidized Stafford Loan - This loan is for students attending at least half-time. The federal government will pay the interest for you while you are enrolled at least half-time, during a grace period or during authorized deferments. The Federal Subsidized Stafford Loan has a low fixed interest rate and a six-month grace period prior to repayment.

Unsubsidized Stafford Loan - This loan is for students attending at least half-time. Repayment of principal is not required while you are enrolled at least half-time, but interest is charged from the time you receive the loan funds. Students have the option to pay the interest when billed each term or defer interest payments. If you allow the interest to accumulate, the interest will be added to the principal and will increase the amount you have to repay. The Federal Unsubsidized Stafford Loan has a low fixed interest rate and a six-month grace period prior to repayment.

3.3.5   Direct PLUS Loans

Direct PLUS Loan - Parents of dependent students and graduate students may be eligible for the PLUS loan. Parents can visit the Parent's page by going to www.pdx.edu/finaid and clicking on the Parent's Page tab for more information and to access the online application. Graduate students can visit www.pdx.edu/finaid under the Types of Aid and Loans menu for more information and the online application. The Federal PLUS Loan has a fixed interest rate of 7.9% and has the option of delaying repayment on the PLUS loan either 60 days after the loan is fully disbursed, or six months after the dependent student is not enrolled at least half-time for PLUS loans disbursed after July 1st, 2008.

Overall, first time loan borrowers must complete the Federal Master Promissory Note (MPN) (See Exhibit) if they are interested in applying for a Subsidized or Unsubsidized loan. Students can receive multiple loans under the Note over a period of 10 years unless it is revoked or canceled by the lender, school or guarantor.

MSON required entrance counseling prior to disbursement as well as Exit counseling which is conducted as soon as a student ceases ½ time enrollment or registers for graduation.

FEDERAL LOAN COUNSELING

Entrance loan counseling is completed both online at www.studentloans.gov before a student attends class and during a presentation in the classroom when a student begins a program at MSON. The Loan Specialist presents detailed information on the Federal Direct Loan Program as well as the basics of federal and state financial aid. The school uses entrance counseling acknowledgement from USDE to track that their requirement has been fulfilled before the student's first loan is disbursed into his/her account.

Exit loan counseling is conducted online at www.studentloans.gov at MSON in the Learning Resource Center approximately 60 days prior to the student's graduation date. Loan history totals are printed and distributed from the National Student Loan Data System (NSLDS) reflecting each student's total federal debt that has been disbursed at the school. Loan servicer contact information is provided for every student for account tracking purposes along with a summary of education tax benefits available through the IRS site (publication 970). The school uses the acknowledgement of completion of exit counseling from USDE to track that the requirement has been fulfilled before the Certificate of Completion is released to the student. A Student Contact Information Sheet is collected and kept in the student's financial aid file.

3.4 Veteran Benefits

Veterans meet with the MSON Veteran Specialist who helps them apply for Veteran Education Benefits with the Department of Veteran Affairs. Once benefits are approved, they may be added to a student's Financial Aid Package depending on the specific program.

Veterans and Service Members

The Veterans Resource Center is committed to assisting those who served or are currently serving in the U.S. military, and their family members. In collaboration with an array of University departments and community organizations, the center provides coordinated services and resources in a one-stop location to ensure that all military service members are afforded the greatest opportunities for success.

Veterans and service members receive individualized assistance in completing request forms such as educational and military transcripts; and applications for the G.I. Bill, Federal Tuition Assistance, and Federal Student Aid programs. Additional services may include help with periods of military activation and deployment; obtaining appropriate housing accommodations; requesting military records; and acquiring community living information, outreach services, and health benefits.

1.   Military Service Activation

Students who, during the course of an academic term, are called into active military service, including National Guard a1nd Reserve, and are not in attendance at the end of the term, will be considered to be a case of extreme hardship. Students who have been activated should notify the Office of the Registrar as soon as possible. Upon proper notification and submission of active duty orders, eligible students may receive special consideration for tuition and fee refunds and/or course credit options. For additional information, contact the Office of the Registrar.

2.   Veterans Education Benefits - GI Bill

The Department of Veterans Affairs (DVA) makes all determinations of a student's eligibility for education benefits. Individuals applying for GI Bill benefits should allow a minimum of 6-8 weeks after applying for benefits and all supporting documents to the DVA before receiving notification of eligibility.

3.   Chapter 30 Montgomery GI Bill (Active Duty)

Educational assistance is available to individuals who have an honorable discharge and meet additional eligibility criteria as determined by the Department of Veteran Affairs (DVA). This program provides up to 36 months of educational benefits. Generally, benefit entitlement ends ten years following the release from active duty.

Effective October 1, 2017, the basic monthly rates for institutional training (for those completing an enlistment of three years or more) are as follows:

Training Time	Monthly Rates
Full time	$1,789.00
¾ time	$1,341.75
½ time	$ 894.50
¼ time or less	$ 447.25**

** Payment is for tuition/fees only and cannot exceed the amount listed above.

4.   Chapter 1606 Educational Assistance (Selected Reserve Program)

Educational assistance is available to individuals who are members of the Selected Reserve, which includes the Army, Navy, Air Force, Marine Corps, and Coast Guard. This educational assistance is also available to members of the Army National Guard and Air National Guard. Reservists may be entitled to receive up to 36 months of educational benefits. Generally, benefit entitlement ends 14 years from the date of eligibility for the program.

Effective October 1, 2017, the basic monthly rates for institutional training are as follows:

	Monthly Rates
Full time	$368.00
¾ time	$275.00
½ time	$183.00
Less than ½ time	$ 92.00**

** Payment is for tuition/fees only and cannot exceed the amount listed above.
Training Time

5.   Chapter 1607 Reserve Educational Assistance (REAP)

Educational assistance is available to individuals who are members of the Reserve components called or ordered to active duty in response to a war or national emergency (contingency operation) as declared by the President or Congress. The Department of Defense and the Department of Homeland Security will determine who is eligible for this program.

The basic monthly rate for Chapter 1607 Reserve Educational Assistance (REAP) varies depending on the length of the training time and the type of training. Effective

October 1, 2017, the basic monthly rates for institutional training are as follows:

Training Time	90-364 Days	1 Year +	2 Years +
Full time	$715.60	$1073.40	$1,431.20
¾ time	$536.70	$805.05	$1,073.40
½ time	$357.80	$536.70	$ 715.60
¼ time	$171.90**	$268.35**	$ 357.80**

** Payment is for tuition/fees only and cannot exceed the amount listed above.

6.   Chapter 33 Post-9/11 GI Bill

Financial support is available for education and housing to individuals with at least 90 days of aggregate service on or after September 11, 2001, or individuals discharged with a serviceconnected disability after 30 days. Individuals who may qualify for more than one education program may or may not want to enroll in the Chapter 33 program until exhausting other program benefits. Before applying for education benefits, each potential applicant is encouraged to complete a thorough benefit comparison of eligibility through each program because the decision to apply for the Post-9/11 GI Bill is irrevocable. To obtain additional information, visit U.S. Department of Veterans Affairs. Department of Veterans Affairs representatives may be consulted to discuss benefit eligibility by telephoning (888) GI-BILL-1 or (888) 442-4551.

7.   Chapter 35 Survivors and Dependents Educational Assistance (DEA)

Educational assistance is available to eligible dependents of certain veterans. This program provides up to 45 months of educational benefits. Eligible dependents must complete the online Application for Survivors' and Dependents' Educational Assistance, VA Form 22-5490, which is available online.

The basic monthly rate varies depending on the types of training.

Effective October 1, 2017, the basic monthly rates for institutional training are as follows:

Full time	$1,021.00
¾ time	$ 765.00
½ time	$ 508.00
¼ time	$ 255.25**

** Payment is for tuition/fees only and cannot exceed the amount listed above.
Training Time Monthly Rates

8.   Chapter 31 Vocational Rehabilitation

Veterans with a service-connected disability may be eligible for vocational rehabilitation services through the DVA. The online application, VA Form 28-1900, is available at the U.S. Department of Veterans Affairs - Veterans Online Application System. Applicants must contact their Veterans Benefits Administration's Vocational Rehabilitation and Employment Counselor, who will notify the Billings and Receivables Office of each applicant's eligibility.

9.   First Time Applicants for Education Benefits (Chapters 30, 33, 1606, and 1607)

1. Complete and submit VA Form 22-1990, Application for Educational Benefits online at U.S. Department of Veterans Affairs - Veterans Online Application System.

2. Complete B/R GI Bill Information page (located on STARS) every semester benefits are to be received.

3. Students receiving Chapter 30 (Montgomery GI Bill Active Duty), Chapter 1606 (Montgomery GI Bill Selected Reserve Program), and Chapter 1607 (Reserve Educational Assistance) benefits must verify their enrollment the last day of each month (or after) with the DVA by calling (877) 823-2378 or online at U.S. Department of Veterans Affairs - WAVE.

10.   Previous Recipients of Education Benefits (Chapters 30, 33, 1606, and 1607)

1. Complete B/R GI Bill Information page (located on STARS) every semester benefits are to be received.

2. Students receiving Chapter 30 (Montgomery GI Bill Active Duty), Chapter 1606 (Montgomery I Bill Selected Reserve Program), and Chapter 1607 (Reserve Educational Assistance) benefits must verify their enrollment the last day of each month (or after) with the DVA by calling (877) 823-2378 or online at U.S. Department of Veterans Affairs - WAVE.

11. Previous Recipients Transferring to MSON (Chapters 30, 33,1606, and 1607)

1. Complete and submit VA Form 22-1995, Change of Program/Change in Training online at the U.S. Department of Veterans Affairs - Veterans Online Application System. Complete B/R GI Bill Information page (located on STARS) every semester benefits are to be received.

2. Students receiving Chapter 30 (Montgomery GI Bill Active Duty), Chapter 1606 (Montgomery GI Bill Selected Reserve Program), and Chapter 1607 (Reserve Educational Assistance) benefits must verify their enrollment the last day of each month (or after) with the DVA by calling (877) 823-2378 or online at U.S. Department of Veterans Affairs - WAVE.

The Business Office is responsible for submitting class certifications for the GI Bill to the Department of Veteran Affairs.

12. Academic Reporting

In addition to certifying the class schedule, the Billings and Receivables Office is required to report changes, such as when a student drops below full-time, three-quarter time, half-time, or one-quarter time, receives an unsatisfactory non-punitive grade, is academically dismissed, or is suspended.

13. Concurrent Enrollment

If a student is obtaining his or her degree at MSON and is completing a course at another institution, he or she may be eligible for GI Bill Education Benefits. Consult with the Business Office to complete the specific procedures for eligibility determination. Completion of a new Application for VA Education Benefits or a Change of Program/Change in Program may cause a delay in receipt of DVA payments. The Billings and Receivables Office is responsible for submitting class certifications for the GI Bill Education Benefits programs to the Department of Veteran Affairs. MSON does not make any eligibility determinations as to the receipt or dollar amounts of any funds received by the Department of Veterans Affairs, the New York Education Department, or the U.S. Department of Education.

Additional Financial Assistance Programs

14. Tuition Assistance

Members of the Army, Navy, Marines, Air Force and Coast Guard may be eligible for Tuition Assistance (TA). Each branch of the military establishes its respective criteria. Military members must initiate the Tuition Assistance application process. Contact your Education Officer for specific details. Additional guidelines are available at Military Education Home Page. Approved Tuition Assistance authorizations must be submitted for processing to the Business Office.

15.   Federal Student Financial Aid

There are various federal financial aid programs available through the U.S. Department of Education including the Pell Grant, Supplemental Educational Opportunity Grant, College Work-Study, and Stafford Student Loans. All veterans and service members are encouraged to complete the Free Application for Federal Student Aid at FAFSA. These federal student aid programs are administered and coordinated by The Office of Financial Aid located in the Montefiore School of Nursing Library Annex.

Montefiore School of Nursing does not make any eligibility determinations as to the receipt or dollar amounts of any funds received by the Department of Veterans Affairs, the New York Education Department, or the U.S. Department of Education.

State Aid Programs in Which Institution Participates

As a private institution, MSON follows all state guidelines to ensure that only eligible students receive state financial aid awards mostly scholarship awards through the New York Education Department (NYED). All state funds are directly awarded to the students, thus, the Office of Financial Aid responsibility to certify enrollment and provide proper reporting to continue these State awards.

Institutional Aid Tuition Aid Scholarships & Grants

1.   **Departmental Scholarships (Various)**

2.   **Donor Scholarships (Various)**

Institutional Aid General Polices & Requirements

following is important information regarding policies and requirements to receive institutional aid at MSON.

- All institutional scholarships and grants are subject to available funding. It is possible for a student not to receive a scholarship/grant that they would have otherwise been eligible to receive simply because there is no more funding available. Students are encouraged to apply as soon as possible.
- Students must maintain Satisfactory Academic Progress to receive institutional aid.
- Institutional Aid and Scholarships may not result in a refund for students only receiving this funding source. These awards are only to cover institutional charges incurred at Montefiore School of Nursing

2.   Ability to Benefit

Public Law 112-74 amended HEA section 484(d) to eliminate Federal student aid eligibility for students without a "certificate of graduation from a school providing secondary education or the recognized equivalent of such a certificate." The law makes an exception for students who have completed a secondary school education in a home school setting that is treated as a home school or private school under State law.

Therefore, students who do not have a high school diploma or a recognized equivalent (e.g.,GED), or do not meet the home school requirements, and <u>who first enroll in a program of study on or after July 1,</u> <u>2012</u>, will not be eligible to receive Title IV student aid. Students would qualify for Title IV student aid under one of the ability-to-benefit (ATB) alternatives if the student were enrolled in a Title IV eligible program before July 1, 2012. Those alternatives include the student passing an independently administered, approved ATB test or successfully completing at least six credit hours or 225 clock hours of postsecondary education.

We note that this change does not affect students with intellectual disabilities who are enrolled in approved Comprehensive Transition and Postsecondary Programs. Students who enroll in such programs remain eligible for Title IV assistance from the Federal Pell Grant, Federal Supplemental Educational Opportunity Grant, and Federal Work Study programs even if they do not have a high school diploma or its recognized equivalent.

<u>Unchanged Student Eligibility Provisions</u>

Public Law 113-235 did not change any of the provisions allowing an otherwise eligible student to receive Title IV aid if the student meets one of the following conditions:

- High School Diploma: The student has a high school diploma.
- Recognized Equivalent of a High School Diploma: The student has the recognized equivalent of a high school diploma, defined in the regulations at 34 CFR 600.2 as:
  o A General Educational Development Certificate (GED);
  o A state certificate or transcript received by a student after the student passed a State-authorized examination, e.g., the High School Equivalency Test (HiSET), Test Assessing Secondary Completion (TASC), the California High School Proficiency Exam (CHSPE), or other Stateauthorized examination that the State recognizes as the equivalent of a high school diploma;
  o 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
  o For a person who is seeking enrollment in an educational program that leads to <u>at least an</u> <u>associate</u> <u>degree or its equivalent</u> and who has not completed high school, but who excelled academically in high school, documentation that the student excelled academically in high school and had met the formalized, written policies of that postsecondary institution for admitting such students.
- Homeschool: The student has completed a secondary school education in a homeschool setting that is treated as a homeschool or private school under State law and has obtained a homeschool completion credential. If State law does not require a homeschool student to obtain a homeschool credential, the student has completed a secondary school education in a homeschool setting that qualifies as an exemption from compulsory school attendance requirements under State law.

<u>Statutory Change</u>

Under Pub. L. 113-235, students who are enrolled in an eligible career pathway program, as defined in section 484(d)(2) of the HEA, on or after July 1, 2014, and who are not high school graduates, or do not meet one of the other eligibility conditions listed above, may be eligible to receive Title IV aid if the student meets one of the following ATB alternatives as defined in section 484(d)(1):

• Passes an independently administered Department of Education approved ATB test.
• Completes at least 6 credit hours or 225 clock hours that are applicable toward a degree or certificate offered by the postsecondary institution.
• Completes a State process approved by the Secretary of Education. *Note: To date, no State process has ever been submitted for the Secretary's approval.*

A student who meets one of those alternatives may use that alternative to establish his or her Title IV eligibility at any eligible Title IV institution where the student enrolls in an eligible career pathway program as defined in section 484(d)(2) of the HEA.

<u>Eligibility of Other Students Without a Valid High School Diploma (Grandfathered Students)</u>

In 2012, the Consolidated Appropriations Act of 2012 (Pub. L. 112-74) amended section 484(d) of the HEA to allow a student without a high school diploma (or its recognized equivalent), or who did not complete a secondary school education in a homeschool setting, and who was enrolled in an eligible program at a Title IV institution prior to July 1, 2012, to be eligible for Title IV aid under the previous ATB alternatives. This provision was explained in Dear Colleague Letter GEN-12-09, and the eligible students were referred to as having been "grandfathered." The new provision in Pub. L. 113-235 does not affect the eligibility of students grandfathered under the 2012 provision.

<u>Eligible Career Pathway Programs</u>

Career pathways refer to a combination of rigorous and high-quality education, training, and support services that are aligned with the skill needs of industries in State or regional economies, preparing individuals to be successful in secondary or postsecondary education programs and the labor market. In recent years, the Federal government has worked to identify the elements of a high-quality career pathway program. Under Pub. L. 113-235, Congress provided an opportunity for students who are enrolled in eligible career pathway programs, but who lack a high school diploma or its recognized equivalent, or who did not complete a secondary school education in a homeschool setting, to become eligible for Title IV aid using one of the ATB alternatives.

To become eligible for Title IV aid under one of the ATB alternatives described above, the student must be enrolled in an "eligible career pathway program," as defined in section 484(d)(2) of the HEA. Any institution, whether public, nonprofit, or for-profit, may offer an eligible career pathway program.

An eligible career pathway program must:

• Concurrently enroll students in connected adult education and eligible postsecondary programs;
• Provide students with counseling and supportive services to identify and attain academic and career goals;
• Provide structured course sequences that o Are articulated and contextualized; and
    o Allow students to advance to higher levels of education and employment;

- Provide opportunities for acceleration for students to attain recognized postsecondary credentials, including degrees, industry relevant certifications, and certificates of completion of apprenticeship programs;
- Be organized to meet the needs of adults;
- Be aligned with the education and skill needs of the regional economy; and
- Have been developed and implemented in collaboration with partners in business, workforce development, and economic development.

As stated above, an eligible career pathway program contains two components: an adult education component and a Title IV eligible postsecondary program component. In this context, "adult education" has the same definition as it does under the Adult Education and Family Literacy Act, Title II of the Workforce Innovation and Opportunity Act (Pub. L. 113-128) and includes academic instruction and education services below the postsecondary level that increases an individual's ability to:

- Read, write, and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent; ⬜ Transition to postsecondary education and training; and ⬜ Obtain employment.

The Title IV, eligible postsecondary program component of an eligible career pathway program, must meet the definition of an eligible program under 34 CFR 668.8 for students enrolled in the eligible career pathway program to be eligible for Title IV aid.

An eligible career pathway program, as defined in section 484(d)(2) of the HEA, is not itself an eligible program under 34 CFR 668.8 because it contains an adult education component that includes, by definition, coursework that is below the postsecondary level. Therefore, an institution may not include the cost of the adult education component of an eligible career pathway program in a student's cost of attendance as defined in section 472 of HEA and may not pay for the cost of the adult education component using Title IV aid. The only costs that can be included in a student's cost of attendance are those associated with the Title IV eligible postsecondary program component.

Similarly, credit or clock hours associated with adult education coursework cannot be incorporated into a student's Title IV enrollment status, regardless of whether the institution considers the adult education coursework to be remedial. However, costs for noncredit or reduced credit remedial coursework that is <u>not</u> part of the adult education component of the eligible career pathway program, but is associated with the Title IV eligible postsecondary program component, can be included in a student's cost of attendance. That coursework can also be included in the student's Title IV enrollment status. For more information on remedial coursework, please see Volume 1, Chapter 1 of the FSA Handbook.

Under the statute, a student is not eligible for Title IV aid if the student is enrolled in elementary or secondary school. However, while the adult education component of an eligible career pathway program includes instruction below the postsecondary level, adult education is not secondary school education. Therefore, a student enrolled in an eligible career pathway program does not lose eligibility because the student is not considered to be enrolled in secondary school.

As noted above, the term "career pathway program" is also defined in the Workforce Innovation and Opportunity Act, and in other laws, including State and local laws. The definition of an eligible career pathway program under section 484(d)(2) of the HEA may differ from definitions in these other laws. A program that qualifies for funding under the Workforce Innovation and Opportunity Act or another law may not meet the definition of an eligible career pathway program in section 484(d)(2) of the HEA. To provide Title IV aid to students who are eligible only through one of the ATB alternatives allowed under

the new law, an institution must ensure that its eligible career pathway program(s) meets the requirements under section 484(d)(2) of the HEA as described above.

Approved ATB Tests

As of the date of this letter, the approved ATB tests are:

Test Publisher Name:	Test Name:
ACT Inc.	ASSET, COMPASS, and COMPASS ESL
Association of Classroom Teacher Testers (ACTT)	Combined English Skills Assessment (CELSA)
The College Board	ACCUPLACER
Wonderlic Inc.	Wonderlic Basic Skills Test

Effect of Timing of ATB Test and Completed Credits on Eligibility for Title IV Aid

A student who was enrolled in an eligible career pathway program as of July 1, 2014, and who meets one of the ATB alternatives prior to July 1, 2014, may be awarded a Federal Pell Grant, TEACH Grant, and any aid from the Title IV campus-based programs beginning with the first payment period of the 2014– 2017 award year in which the student was enrolled. A Direct Loan can be awarded for the entire loan period that includes July 1, 2014.

A student who was enrolled in an eligible career pathway program as of July 1, 2014, and who meets one of the ATB alternatives on or after July 1, 2014, may be awarded a Federal Pell Grant, TEACH Grant, and any aid from the Title IV campus-based programs beginning with the payment period in which the student meets the ATB alternative. A Direct Loan can be awarded for the entire loan period that includes the date when the student meets the ATB alternative.

Career Pathway Alternative Pell Grant Disbursement Schedules

In general, the Federal Pell Grant Program receives funding from two sources in the Federal budget, *discretionary appropriations,* and *mandatory funding*. Public Law 113-235 amended section 401(b)(2)(A)(ii) of the HEA, which provides the amount of Pell Grant funds a student who is enrolled in an eligible career pathway program is eligible to receive. Beginning with the 2017–2016 award year, some students, as described below, will only be eligible for the amount provided under the discretionary appropriation. These Limited Pell Grant awards for such students will be determined using the appropriate Career Pathway Alternative Pell Grant Disbursement Schedules that are attached to this letter.

Limited Pell Grant – Any student whose first enrollment in any Title IV eligible postsecondary program was on or after July 1, 2017, and is eligible under one of the ATB alternatives for enrollment in an eligible career pathway program, will only be eligible for a Limited Pell Grant award. Institutions must use the attached Career Pathway Alternative Pell Grant Disbursement Schedules to determine the amount for which the student is eligible. The maximum Limited Pell Grant amount that such a student may receive for enrollment in an eligible career pathway program for the 2018-19 award year is $6096.
Note that the Career Pathway Alternative Pell Grant Disbursement Schedules use the same maximum Pell Grant eligible expected family contribution (EFC) that was used to develop the Regular Federal Pell Grant Payment and Disbursement Schedules. Once the student's annual award amount is determined using the

Career Pathway Alternative Pell Grant Disbursement Schedules, all other Pell funding calculations (e.g., determining the Pell Grant amount for each payment period) are the same as those used for Regular Pell Grant awards, but based on the Career Pathway Alternative Pell Grant Disbursement Schedules.

Although a student in an eligible career pathway program may have his or her Pell Grant award determined using the Career Pathway Alternative Pell Grant Disbursement Schedules, calculation of the percentage of the student's annual Scheduled Award used will be based on the student's full Scheduled Award under the Regular Federal Pell Grant Payment Schedule. For example, a student in an eligible career pathway program who is only eligible for a Limited Pell Grant award and has an EFC of 0 for the 2017–2016 award year will only receive $4,860 if that student attends full-time for the full year. The student would only have used 84.1558 percent ($4,860 / $5,775) of the student's Scheduled Award for the 2017–2016 award year. For more information on calculating Pell Grant awards, please see Volume 3, Chapter 3 of the FSA Handbook.

Regular Pell Grant – Any otherwise eligible student whose first enrollment in any Title IV eligible postsecondary program was before July 1, 2017, and who is enrolled in an eligible career pathway program in or subsequent to the 2017–2018 award year, is eligible for a Regular Pell Grant award. For these students, institutions must use the Regular Federal Pell Grant Payment and Disbursement Schedules published in GEN-15-02 for the 2017–2018 award year and the Federal Pell Grant Payment and Disbursement Schedules that are published annually for subsequent award years.

For a student who enrolls in an eligible career pathway program on or after July 1, 2017, an institution must determine whether the student should receive a Regular Pell Grant award or a Limited Pell Grant award based on when the student began attendance in any Title IV eligible postsecondary program, without regard to whether the student received Title IV aid. For example, consider a student who enrolled in a Title IV eligible postsecondary program at School A in August 2003 in the 2003–2004 award year and then enrolls in an eligible career pathway program at School B in December 2017 in the 2017–2018 award year. Because this student first enrolled in a Title IV eligible postsecondary program before July 1, 2017, the student would be eligible for the Regular Pell Grant amount (using the schedules from GEN-15-02) at School B for a maximum Pell Grant amount of $5,775 in the 2017–2016 award year, regardless of whether the student received Title IV aid for the earlier enrollment at School A.

Documentation – An institution must document its determination as to whether a student qualifies for a Limited Pell Grant award or a Regular Pell Grant award for the 2017–2016 award year and for any subsequent award years. If the institution's determination is that the student is eligible for a Regular Pell Grant award, such documentation could include documentation from the National Student Loan Data System that the student previously received Title IV aid, or a transcript or other documentation from a previous institution that demonstrates that the student was enrolled in an eligible program at a Title IV institution.

Title IV Eligibility for Students Without a Valid High School Diploma or Its Recognized Equivalent Who Are Eligible Under One of the ATB Alternatives

The following chart provides a summary of the conditions under which a student who does not have a high school diploma or its recognized equivalent may be eligible for Title IV aid.

* To award and disburse Pell Grant funds to these students, institutions would use the Regular Pell Grant Payment and Disbursement Schedules described in Dear Colleague Letter GEN 14-01 for 20142017 and Dear Colleague Letter GEN 15-02 for 2017-2018
** To award and disburse Pell Grant funds to these students, institutions would use the Career Pathway

SECTION 4: INSTITUTIONAL REQUIREMENTS RELATING TO EDUCATION LOANS

4.1   Private Education Loan Disclosures

Many students use private loans to help pay their tuition costs. These loans are credit- based, and we strongly recommend that students apply with a cosigner to ensure that they are receiving the best interest rate possible.

Private loans are applied for directly from the lender by a student or parent. Borrowers must be credit worthy. A list of lenders that offer private education loans is available through the financial aid website.

4.2   Direct Loan Disclosures

Loan for undergraduate students enrolled at least half-time (6 credit hours). Students can get a loan regardless of income, but the federal government pays interest only on need-based subsidized loans while a student is enrolled at least half time. The interest accrues on unsubsidized loans while the student is in school. Interest rates can vary depending on the type of loan and academic year. Students must sign a Master Promissory Note (MPN) with the Department of Education, and new borrowers must complete entrance counseling online at www.studentloans.gov.

SECTION 5:   STUDENT CONSUMER INFORMATION REQUIREMENTS

5.1   Family Educational Rights and Privacy Act (FERPA)

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 also provide a notice of student rights under the Family Educational Rights and Privacy Act (FERPA).

MSON complies with the provisions of the 1974 Family Educational Rights and Privacy Act (FERPA). FERPA assures students attending a postsecondary educational institution that they have the right to inspect and review certain educational records and to seek corrections of inaccurate or misleading data through informal or formal procedures. FERPA also protects student privacy rights by setting strict limits on disclosure of students' educational records without their consent. Students can seek enforcement of their FERPA rights by filing complaints with the Family Policy Compliance Office, U.S. Department of Education, 400 Maryland Ave. S.W., Washington, DC 20202-5920. Information about this office is available on the Internet at http://www.ed.gov/offices/OM/fpco.

MSON has designated the following information as directory information under FERPA and, as such, may be disclosed, without consent, to a third party upon request:

- Student's name

- Degrees, honors, and awards received
- Major field of study
- Dates of attendance
- Institutional email address
- Photograph

A student must submit a written release for additional information to be given to any person or agency. Students are notified annually of their rights under FERPA. Also, notice of Confidential Release must be on file with the Registrar's Office to determine the level of information shall be released to a parent or public individual.

5.1.1 Financial Aid Information

Students must file a Free Application for Federal Student Aid (FAFSA) to determine financial need and to receive federal aid.

All applicants for financial aid must be United States Citizens or eligible noncitizens. Satisfactory Academic Progress (SAP) must be maintained while attending MSON to receive federal or institutional aid. Students can submit an appeal of financial aid suspension.

5.1.2 Institutional Information

MSON makes certain information about itself is readily available upon request to enrolled and prospective students. This information is often maintained by offices other than financial aid.

5.1.3 Completion or Graduation Rate

Graduation rates are available through the Registrar's Office and in the academic catalog. These statistics are published in the annual IPED's report and are disclosed to all students after submitting a FAFSA.

5.1.4 Annual Security Report

An annual campus security report is made available by Campus Safety. These statistics are published in a report covering the previous three calendar years. Campus Safety submits a statistical report the US Department of Education on an annual basis.

5.1.4.1 Timely Warnings and Emergency Notifications

MSON makes timely warnings to the campus community about certain crimes reported to campus security authorities or local police agencies and considered threats to students and employees. MSON also follows emergency notification as well as emergency response and evacuation procedures if there is an immediate threat to the health or safety of students or employees occurring on campus.

5.1.4.2 Campus Crime Log

The campus security department maintains and makes available a campus crime log.

5.1.5 Annual Fire Safety Report

As an institution that maintains on-campus student housing facilities, MSON distributes an annual fire safety report to enrolled students and current employees. The statistics portion of the report is also submitted to the ED, as required. Campus Safety is responsible for the annual fire safety report.

5.1.5.1 Fire Log

As an institution that maintains on-campus student housing facilities, MSON maintains and makes available a fire log. Campus Safety is responsible for maintaining the fire log.

5.2 Title IV Loan Counseling

Prior to receiving the first disbursement of a Direct Subsidized Loan or Direct Unsubsidized Loan, the student must undergo entrance counseling unless the student has received a prior Direct Subsidized Loan, Direct Unsubsidized Loan.

In addition, *all student borrowers* of a loan made under the Federal Direct Stafford Loan programs must undergo exit counseling after the borrower ceases at least half-time enrollment at the institution.

5.2.1 Entrance Counseling and MPN

First-time Federal Direct Stafford Loan borrowers must complete a Stafford Loan Master Promissory Note (MPN) and Entrance counseling session. Entrance Counseling and the Loan Master Promissory Note (MPN) should both be completed online at www.studentloans.gov. Both must be on file before funds can be approved and sent to MSON. This insures that the student fully understands their rights and obligations as a student loan borrower. Returning borrowers (students who have borrowed a Federal Stafford Loan within the past 12 months) do not need to complete another MPN or Entrance Counseling Session. Entrance counseling informs students of their various loan repayment responsibilities, including repayment options, interest accrual, and aggregate loan limits.

5.2.2 Exit Counseling

Once a student has graduated, dropped below a half-time enrollment status, or has withdrawn from school, the Office of Financial Aid will send the student notification to complete Exit Counseling.

The letter informs the student that the must visit www.studentloans.gov and complete Exit Counseling. Exit counseling informs students of their various loan repayment responsibilities, including repayment options, interest accrual, and aggregate loan limits.

Financial Aid Program Availability

Financial aid programs which are available to students attending the Institution are distributed through the following published documents:

- The Institution Catalog
- The MSON Financial Aid Guide
- The Institution Financial Aid website

Additional resources are published outside of but are distributed through, the Office of Student Financial Aid & Scholarships. These resources include but no The Guide to Federal Student Aid published by the U.S. Department of Education

Financial aid funds may be categorized into four basic sources: federal, state, institutional, and private. Listed below are only Federal, State, and institutional sources for the Institution. Additional outside sources can be found in the appendix.

FEDERAL

- Federal Pell Grant Program
- Federal Supplemental Educational Opportunity Grant Program
- Federal Work-Study Program
- Federal Subsidized Direct Stafford Loan Program
- Federal Unsubsidized Direct Stafford Loan Program
- Federal Direct Parent PLUS Loan Program

STATE

Institutional funds that are available to MSON students are administered through The Office of the President and The Office of Financial Aid via recommendations from individual Institutional departments as scholarships and fee remissions.

Procedures and Forms Required to Apply for Federal Student Aid

The procedures required to apply for financial aid are published in the Institution Catalog along with a description of where to find the forms to apply. These procedures and forms are also available in the Financial Aid Guide and website. In addition, notices announcing deadlines and application availability are distributed on signs outside the office. Aid is awarded on a first-come, first-served basis using a priority deadline. Students who complete their files after this priority date may receive limited funding.

A student need only submit the Free Application for Federal Student Aid (FAFSA) to begin the process. However, there are many forms which may be required to completely evaluate student aid eligibility.

Additional documents may be requested to complete processing of the aid request because of discrepancies with data or FAFSA matches with the Central Processor. Notifications of these additional required documents are sent to students through an email, official letter, or personal contact by financial aid or a designee. Additional information needed may include, but is not limited to, the following:

- Proof of citizenship,

- Proof of selective service registration,

- Marriage certificate,

- Institutional Verification Form,

- Tax returns (parent and/or student/spouse),

- W-2 forms (parent and/or student/spouse),   Clearance Letter from Lender/Servicer.

In regards to a rejected, defaulted, or ineligible status

- Self-Certification of Drug Conviction Eligibility.

- Letter from Physician - in reference to previously discharged loans due to temporary or permanent disability.

- Federal Funds Overpayment Resolution Letter.

- Default Clearance Letter from Lender/Servicer.

Methods of Disseminating Consumer Information

The primary method of disseminating consumer information to Institution students is through the Institution Catalog. Also, information is distributed through:

- Admittance letter referencing website and how to accept award,

- The MSON Financial Aid Guide,

- The Institution Financial Aid website,

- The Institution Course Schedule Catalog, and

- The Institution Student Handbook.
- Mailing.
- Electronic email.

Student Eligibility Requirements

Student eligibility requirements are listed in the following documents:

- The Institution Catalog.
- The MSON Financial Aid Guide.
- On specific aid applications (i.e., loan applications for Stafford Loan and scholarship applications describe eligibility requirements).
- Federal Student Guide and Brochures.

To be eligible to receive Federal assistance, a student must:

1. Be admitted and enrolled in an eligible program of study.
2. Be a U.S. citizen, U.S. national, or U.S. permanent resident or reside in the United States for other than a temporary purpose (supportive documentation may be required to verify residency or citizenship status) as an eligible non-citizen.
3. Maintain satisfactory academic progress in their course of study.
4. Not be in default on any loan or owe a repayment on a Federal Pell Grant, or FSEOG, or Grant.
5. Demonstrate financial need via the FAFSA.

Criteria for Selecting Recipients and Determining Award Amounts

EDEXPRESS has packaging formulas set up for need-based awards. EDEXPRESS packages all the need based awards to students who meet the criteria and who have their applications complete. Federal Work Study is awarded to students who meet the criteria and who marked that they are interested in FWS on the FAFSA as funding allows.

Students may obtain the criteria used for selecting financial aid recipients and determining award amounts by making an appointment with a financial aid counselor at the Office of Financial Aid front counter, email or via phone.

Availability of Forms and Instructions

Availability of forms and instructions is listed in the following documents:

- The Institution Catalog,
- The MSON Financial Aid Guide,
- The Institution Financial Aid website, and
- On specific aid applications (i.e., loan applications for Stafford Loan and scholarship applications describe eligibility requirements).

Rights and Responsibilities of Students on Financial Aid

As a recipient of financial aid, there are certain rights and responsibilities of which students should be aware. These rights and responsibilities of students on financial aid are listed in the following documents:

- Federal Student Guide,
- The MSON Financial Aid Guide, and ▪ NASFAA Encyclopedia.

Students have the right to know the:

- ✓ Financial aid programs available at the Institution.
- ✓ An application process that must be followed to be considered for aid.
- ✓ Criteria used to select recipients and calculate need.
- ✓ The Institution refund and repayment policy.
- ✓ The Office of Financial Aid policies surrounding satisfactory academic Progress.
- ✓ Special facilities and services available under the Americans with Disabilities Act (ADA).
- ✓ Disbursement procedures for financial aid.
- ✓ Procedure for determining how his/her financial aid was awarded.
- ✓ Procedure for accepting/declining aid package.

Students are responsible for:

- ✓ Completing all forms accurately and by the published priority deadlines.
- ✓ Submitting information requested by The Office of Financial Aid staff promptly.
- ✓ Keeping The Office of Financial Aid informed of any changes in address, name, marital status, financial situation, or any change in student status.
- ✓ Reporting to The Office of Financial Aid any additional assistance from non-institutional sources such as scholarships, loans, fellowships, and educational benefits.
- ✓ Notifying The Office of Financial Aid of a change in enrollment status.
- ✓ Maintaining satisfactory academic progress.

- ✓ Re-applying for aid each year.
- ✓ Understanding and accepting responsibility for all agreements signed.

Cost of Attendance

A description of the fees for attendance is published in the Institution Catalog and on the MSON website. An estimated budget for the total cost of attendance is published in the MSON Financial Aid Guide. A complete budget outlining the cost of attendance may be obtained from the Office of Student Financial Aid

Refund Policy

A detailed description of the refund policy is described in the Institution Catalog and the Institution website.

Academic Programs Offered

A description of the academic programs offered at the Institution is listed in the Institution Catalog. Additional information may be obtained from the Institution website and The Registrar's Office.

Person(s) Designated to Provide Financial Aid Information

Information concerning persons designated to provide financial aid information is listed in the Institution Catalog and on the Institution Financial Aid website. Only information published, provided, or referred by The Office of Financial Aid staff is valid. Any additional information should be verified with staff from the financial aid office.

Student Retention and Completion Data

Student retention and completion data is gathered by the Office of the Registrar. The Office of Institutional Research and Planning also has published data that has been disseminated for public consumption.

Information for Students with Disabilities

Information concerning students with disabilities is listed in the Institution Catalog and Student Handbook. Students are encouraged to inform the Office of Financial Aid of any special or unusual circumstances.

The Disability Resource Center provides information and assistance to students with disabilities who are in need of special accommodations. This office should be contacted for additional information.

Information on Accreditation

Information concerning accreditation is listed in the Institution Catalog and website. Additional information may be obtained from the Institutional Research or the School of Nursing Office of Academic Affairs.

Drug and alcohol abuse prevention

The Institution annually publishes and distributes to faculty and staff "An Information Guide to Alcohol and Other Drug Problems." Students are notified by the publishing of the same document in the Fall Term Schedule of Classes. More information can be found at Montefiore School of Nursing Handbook on pages 17,18 &24.

Institutional security policies and crime statistics – CLERY (Campus Security Act).

All institution policies and crime statistics, along with annual reports and CLERY Act information can be found on the MSON Website.

Missing Student Notification Policy

If a student living in MSON on-campus student housing is determined to be missing, the Institution has 24 hours or less, after receiving the report to initiate notification procedures. Below is the Institution Housing policy on missing residents and Campus Public Safety Office's missing resident policy and procedure. More information is available on the MSON Website

Fire Safety Report

The annual Fire Safety Report can be found on the MSON Website.

Constitution and Citizenship Day

The school holds educational events pertaining to the United States Constitution at the Office of Financial Aid on September 17th of each year. This event includes free informational materials educating students about the United States Constitution. For more information, contact the Office of Financial Aid at 914-361-6081.

Copyrighted Material

As an institution that values intellectual inquiry in its undergraduate and graduate programs, provides leadership in the development of knowledge and creates opportunities for the application of knowledge to real-world problems; Montefiore School of Nursing is committed to adhering to all applicable laws regarding intellectual property. This policy establishes Montefiore School of Nursing's compliance standards with Title 17 U.S. Code, the United States Copyright Act, the Digital Millennium Copyright Act of 1998, and the Technology, Education, and Copyright Harmonization (TEACH) Act 2002.

Private education loan certification

Pursuant to Section 155 of the Higher Education Act of 1965, as amended, (HEA) and to satisfy the requirements of Section 128(e)(3) of the Truth in Lending Act, a lender must obtain a selfcertification signed by the applicant before disbursing a private education loan. The school is

required on request to provide this form or the required information only for students admitted or enrolled at the school. Throughout this Applicant Self-Certification, "you" and "your" refer to the applicant who is applying for the loan. The applicant and the student may be the same person.

The form can be found at http://ifap.ed.gov/dpcletters/attachments/GEN1001A-AppSelfCert.pdf

Net Price Calculator

This calculator is intended to provide *estimated* net price information (defined as estimated cost (price) of attendance — including tuition and required fees, books and supplies, room and board (meals), and other related expenses — minus estimated grant and scholarship aid) to current and prospective students and their families based on what similar students paid in a previous year. Additional information is available on the MSON Website.

Penalties Associated with Drug-related Offenses

The use and sale of illicit drugs by students and employees is strictly prohibited in accordance with federal and state regulations and laws. Any student or employee found to be using, possessing, manufacturing, or distributing controlled substances in violation of the law on Institution property or at Institution events may be subject to both administrative disciplinary actions and criminal proceedings. All drug related violations by students on campus and at Institution sponsored events off campus may be handled under procedures outlined in the Student Conduct Code. The Institution will take appropriate personnel actions for infractions by employees, up to and including termination. Violations of state and federal laws may be referred to the appropriate authorities.

College Navigator Website

Consists primarily of the latest data from IPEDS. The College Navigator website can be found at http://nces.ed.gov/collegenavigator/?cx=1

Student Body Diversity

Information about student diversity can be found in the Office of Student Services at 914-3616537.

Textbook Information

The intent behind this requirement is to enable students to make more fully informed decisions regarding course selections and to enable students to seek out less expensive sources from which to acquire required materials. Additional information is available in the Office of Academic Affairs at 914-361-6311

Mail Voter Registration

Students have voter registration application available to them in the lobby of the Office of Student Services.

Gainful Employment

Gainful Employment (GE)" programs—programs defined at MSON as certificate programs to disclose information about those programs. Currently, there are no Gainful Employment Certificate Programs at Montefiore School of Nursing.

FERPA (See 34 CFR, Part 99)

Institution policy is located in the Montefiore School of Nursing Deans Office at 914-361-6311.

Financial Aid Office's policies are located on the MSON Website.
Note that the financial aid policy is rather brief and only emphasizes what happens when a student elects to mark records as confidential. Also, there is no reference to institutional of federal FERPA guidelines.

However, it is important to note that when a record is marked confidential, the student cannot discuss with anyone in the office, his student record over the phone or through e-mail. Otherwise, the institution has violated FERPA guidelines. Furthermore, if the student wishes to discuss his information in person, he/she needs to show a valid ID.

Student records can be discussed with parents if the student is considered independent as defined for tax purposes. This has the potential for conflict if parents are divorced and determining which parent has the actual right to the information. The Department of Ed suggests remedying this conflict by implementing an institutional policy that trumps this problem.

Finally, with regards to counselors seeing students at the same time, FERPA implies that if a student has the potential to access another student's records, this violates said student's right to privacy. There is no distinction made under FERPA as to how a student has access to another student's records, just that it should be avoided. The law mandates that "if allowing a student to review his or her education records would violate the privacy of a different student's records, either the other student's information must be redacted, or consent must be obtained before disclosure." See www.finaid.org/educators/ferpa.phtml I take this to mean that if two students are meeting with two counselors in the same office at the same time if they can get the other's information, we are violating their privacy under FERPA.

INSTITUTIONAL FORMS AND MATERIALS USED

Student Handbook and Verification Guide, and all other general and processing guides may be found at:

http://ifap.ed.gov/ifap/publications.jsp

http://www.fsapubs.gov/

SECTION 6:   APPLICATIONS & FORMS

6.1   Application Process

Students wishing to use financial aid must have a clear NSLDS record and complete the FAFSA for the appropriate award year.

Once the results from the FAFSA are received, the Office of Financial Aid can determine what types and how much aid the student will qualify to receive.

6.2   Forms

All forms must be completed before a student can receive financial aid.

Students will be asked to complete forms, depending on the status of their ISIR and the aid in which they receive.

6.3   Deadlines

The Office of Financial Aid must have a completed FAFSA on file before any federal aid can be awarded to the student. If applying for institutional scholarships/grants, the application must be complete and submitted to the Office of Financial Aid by the published deadline.
Students cannot receive any institutional aid until the application is submitted prior to the end of late registration.

Priority Consideration Deadline: Many student aid funds are limited, and demand is usually greater than funds available. Priority status is given to students who apply and have a complete file by the following dates. You must apply by April 1. It is still possible for certain award funds to be exhausted prior to May 15. Therefore, students are encouraged to complete their FAFSA and submit any required documents as soon as possible.

Late applications are processed on a rolling basis as time and volume permit.

6.4   Document Assignment, Collection, & Tracking

MSON is required to collect and retain certain documents for each student file.

The document tracking section of Banner is required to be accurate and up to date to list all the financial aid documents that we have on file for a student. Documents are loaded into Banner as needed based upon a student's ISIR or other information made available to the Office of Student Financial Aid & Scholarships. Documents are collected from students and can usually be submitted electronically, but most documents related to federal/state financial aid require a physical signature. (Note: The original Statement of Educational Purpose must be submitted.) Documents are stored in student files, and many documents are scanned electronically.

SECTION 7:   FILE REVIEW

There are numerous reasons why a student's file needs to be reviewed. This most often occurs when a student is selected for verification or when the ISIR contains C-Codes that required resolution. However,

files can be reviewed for any number of reasons, including when a student asks questions about their account. Anytime the Office of Financial Aid is made aware of conflicting information or information that needs further review; the office resolves the situation by working with the student. This often means collecting additional documentation.

7.1 Verification

7.1.1 Selection of Applicants to be Verified

Under normal processing regulations*, roughly 30% of the students that attend MSON will be selected by the Department of Education for the verification process. Some students that submit for a change of dependency or professional judgment or have unusual circumstances or conflicting information could be manually selected for verification by the school.

 MSON verifies any ISIR that is selected by the Department of Education. The only exception to this is when a student's ISIR is selected for verification after they are no longer enrolled for the current academic year and aid received when they were enrolled has already been disbursed. Any professional judgment requests or change of dependency requests must be submitted to the Office of Student Financial Aid & Scholarships.

Montefiore School of Nursing is currently under Heighten Cash Monitoring 2 Process. With this, the Institution is required to verify 100% of students enrolled and selected for verification by the Central Processing System (CPS).

7.1.2 Acceptable Documentation & Forms

Collection of documents must be uniform and consistent, across the student population.

Students selected for verification will be required to submit specific forms to the Office of Student Financial Aid & Scholarships. Forms that could be required include but are not limited to:

- Verification Worksheet
- Parent/Student Tax Return Transcript
- Parent/Student W-2s
- No W-2 Form
- Low Income/Non-Tax Filer form
- SNAP/Food Stamps Document
- Child Support Paid Document
- Untaxed Income Document
- Statement of Educational Purpose
- Unaccompanied Youth Form
- Ineligible PLUS Borrower Form
- Statement for Previous Loan Discharge
- Special Circumstances Form
- Dependency Change Request Form
- Financial Aid Suspension Appeal Form

7.1.3   Data Elements to be Verified

The Department of ED has long stated that financial aid administrators must judge when a given circumstance might reasonable constitute conflicting information and that FAAs do not have to be tax experts when dealing with information reported by students and parents.

Adjusted gross income, US Income tax paid, household size, number enrolled in college and certain untaxed income and benefits, along with other data elements must be verified and selected and verified for each student.

FAAs are required to know whether or not an individual was required to file a tax return; what an individual's correct filing status should be; and that an individual cannot be claimed as an exemption by more than one person.

Information from the Verification Worksheet is used to compare what is submitted on the FAFSA. Corrections will be made from the worksheet to the ISIR by the FAA. Tax documents must be reviewed line by line to ensure the information on the FAFSA matches the taxes. W2's will be reviewed to ensure everything matches the FAFSA, including any contributions to a tax deferred pension or savings plan.

7.1.4   Conflicting & Inaccurate Information

Upon learning of a discrepancy between the FAFSA and verification documents, the school is required to correct the information.

The Institution is required to update the correct information on the ISIR. The school may do so by submitting corrections through FAA Access to CPS, online. All conflicting information must be resolved before the student can be packaged and have aid disbursed.

7.1.5   Resolving Conflicting Information.

Before an award can be made to a student, conflicting information will be resolved. For example: In checking the NSLDS database, the Financial Aid Office discovers that the student has attended another college but failed to inform the Admissions Office. The Financial Aid Office will notify the Admissions Office of the conflict and place a processing hold on the student's record. The student will be informed that in order to be awarded financial aid, the academic transcript from the other college must be received by the Admissions Office. As conflicts arise they will be addressed, and any other offices involved will be notified.   Charts are available by selecting the link: http://ifap.ed.gov/qadocs/FSAVeriModule/activity4verif.doc

7.1.6   Student Notification of Verification Changes

When an error is found during verification, the school will send the corrections via FAA Access. If the error changes the student's award that was initially packaged, then the system will generate a revised award letter to notify the student of their change in eligibility.

7.1.7   Secondary Confirmation

If the database match with immigration records doesn't confirm a student's claim to be an eligible noncitizen, the DHS will automatically try to otherwise determine the student's status. If this automated process confirms a student's eligible noncitizen status, it obviates the manual secondary confirmation that uses the G-845 form.

The CPS will wait for up to three days to give the DHS time to conduct the automated secondary confirmation. If after three days the DHS has not been able to confirm the student's citizenship status, the CPS will process SARs and ISIRs with a secondary confirmation match flag value of "P," meaning that the procedure is still in progress. Once the DHS finishes the confirmation, the CPS will generate SARs and ISIRs reporting the results.

The school should wait at least five but no more than 15 business days for the result of automated secondary confirmation. If the result has not been received by that time, the school must begin the paper process.

A correction made while the DHS is conducting the automated secondary confirmation will start the process over, i.e., the correction will be sent through primary confirmation. Though unlikely, if the new primary confirmation match yields a "Y," the transaction can be used to award aid. A correction made to a transaction that contains secondary confirmation results of "Y" or "C" (or a transaction with a primary confirmation result of "Y") will not be sent through the DHS citizenship match again. Otherwise, the record will be re-sent for matching.

Paper Secondary confirmation

If the student didn't pass automated secondary confirmation or if you have conflicting information about his immigration status, you must use paper secondary confirmation. The student has to give you unexpired documentation showing that he is an eligible noncitizen. If you determine the evidence is not convincing, he isn't eligible for FSA funds. However, if the documentation appears to demonstrate that he is an eligible noncitizen, you must submit it to the USCIS (in the DHS) to confirm it is valid. One exception to this applies to victims of human trafficking, as noted below.

Documents that establish aid eligibility

The standard document for a **permanent resident** of the United States is the Permanent Resident Card (Form I-551 since 1997) or Resident Alien Card (Form I-551 before 1997). Both forms are referred to colloquially as "green cards," though they are not green. Possessors of the older Alien Registration Receipt Card (Form I-151, issued prior to June 1978) should have replaced it with a newer card, but for receiving FSA funds, it is acceptable as evidence of permanent residence.

Permanent residents may also present an Arrival/Departure Record (CBP Form I-94) or the new Departure Record (Form I-94A, which is used at land border ports of entry) with the endorsement "Processed for I-551. Temporary Evidence of Lawful Admission for Permanent Residence. The form will have an A-Number annotated on it and is acceptable if the expiration date has not passed.

The U.S. Department of State issues a machine readable immigrant visa (MRIV) in the holder's passport. The MRIV will have a U.S. Customs and Border Protection (CBP) inspector admission stamp, and the statement "UPON ENDORSEMENT SERVES AS TEMPORARY I-551 EVIDENCING PERMANENT
RESIDENCE FOR 1 YEAR" will appear directly above the machine readable section. An MRIV with this statement, contained in an unexpired foreign passport and endorsed with the admission stamp, constitutes a temporary I-551, valid for one year from the date of endorsement on the stamp.

The USCIS now issues the United States Travel Document (mint green cover), which replaces the Reentry Permit (Form I-327) and the Refugee Travel Document (Form I-571). It is used by lawful permanent

residents (as well as refugees and asylums) and is annotated with "Permit to Reenter Form I-327 (Rev. 9-2-03)."
For classes of eligible noncitizens other than permanent residents, evidence of their status typically is on the I-94, but other documents are also acceptable.

> • **Refugees** may have a Form I-94 or I-94A annotated with a stamp showing admission under Section 207 of the Immigration and Nationality Act (INA). They may also have the old Refugee Travel Document (Form I-571) or the new U.S. Travel Document mentioned above annotated with "Refugee Travel Document Form I-571 (Rev. 9-2-03)."

Using the G-845 for secondary confirmation

To initiate paper secondary confirmation, you must complete a Form G-845 and send it to the USCIS field office for your area within ten business days of receiving the student's documentation. The G-845 ("Immigration Status/Document Verification Request") is a standard form that asks the USCIS to confirm a noncitizen's immigration status. See the electronic announcement dated June 29, 2009, on the **www.ifap.ed.gov** website for more information and to download a copy of the form.

7.1.8 Awarding & Disbursement of Funds During Verification

MSON chooses not to award students until required verification or any other required resolution has been completed. This also means that students will not have any FAFSA based awards disbursed prior to required verification being complete. It is important for students to submit any required documents as soon as possible so that their award and disbursement is not delayed any longer than necessary.

7.2 Database Matches, Reject Codes, & C-Codes Clearance

There are a variety of issues that can appear on a student's ISIR that must be resolved prior to awarding financial aid. These can include database matches, reject codes and comment codes (CCodes). When importing a new ISIR into EDEXPRESS, the system loads required documents based on any issues that require resolution. These documents are set up each academic year based on any changes from the prior year. Students are informed of the documents they need to submit or steps to complete the required resolution. Office of Financial Aid staff members (typically counselors) process all documents until the required resolution is complete. Once completed, all documents are signed off on in EDEXPRESS, and the student is then awarded the aid that they are eligible to receive.

7.3 Review of Subsequent ISIR Transactions – Post screening

The Institution is required to review all subsequent transactions for a student, even if you already have verified an earlier transaction.

First, determine if the EFC or any of the "C" flags have changed or if there are new comments or NSLDS information. If the EFC has not changed and there are no changes in the "C" flags or NSLDS information, generally no action is required. If the EFC does change but it either doesn't affect the amount or type of aid received, or the data elements that changed were already verified, no action is required. But if the EFC changes and the pertinent data elements were not verified, then you must investigate. Of course, anytime a "C" flag changes or NSLDS data has been modified, you must resolve any conflicts.

7.4   Verification of Enrollment Status

Enrollment status refers to the level at which a student is enrolled each semester. MSON uses the enrollment statuses of full time, three quarter time, half time and less than half time for the awarding of financial aid. (Not all programs use all enrollment statuses.) Enrollment statuses are defined in the institution's academic course catalog.

Undergraduate students are typically awarded initially based on full time enrollment so that students can see the maximum amount of financial aid that they would be eligible to receive.

Students are informed in their award letter of the enrollment status that their financial aid package is based on, and they are instructed to contact the Office of Financial Aid if they know that the enrollment status on the award letter is incorrect. In addition, when students finalize their registration (approve their bill) in the student portal, they are informed of the enrollment status that their pending aid is based on and instructed to contact the Office of Financial Aid if they are registering for a different number of hours than indicated there.

As of the financial aid census date (the end of that semester's 100% tuition refund withdrawal period), the Office of Financial Aid locks in all financial aid awards based on the student's enrollment status as of that date. Students that added hours after approving their bill are repackaged, and awards are adjusted/increased as needed based on their new enrollment status. Students that dropped hours after approving their bill are repackaged, and awards are adjusted/decreased as needed based on their new enrollment status.

In addition, faculty members submit signed final roll sheets to the Registrar's Office to confirm that students have begun attendance in an on campus course or have completed the Course Enrollment Verification (CEV) or other coursework in an online course.

Generally, federal financial aid awards are not adjusted if a student drops a course after the census date. There are two specific exceptions to this.

- Students are required to be enrolled at least half time at the time their federal loans disburse. If a student is enrolled half time as of the census date but drops below half time prior to loan disbursement, then they are no longer eligible for student loans.
- When student withdrawals from all courses (including an unofficial withdrawal) or when they are administratively withdrawn, students can lose financial aid based upon several factors. The amount of aid they are allowed to keep and the amount that must be returned is calculated through the R2T4 (Return to Title IV) process.

7.5   Unusual Enrollment History

Beginning with the 2013-2014 award year, the U.S. Department of Education will flag federal student aid (FAFSA) applications for 'unusual enrollment history' to identify instances of potential fraud and abuse of the Federal Pell Grant Program.

The flag will identify students who have been awarded the Federal Pell Grant at multiple postsecondary institutions and remained enrolled only long enough to receive a Title IV credit balance/refund, leave without completing the enrollment period, enroll at another institution, and repeat the pattern. The

period of review includes academic enrollment periods during 2020-2021, 2021-2022, and 2022-2023. These students are not eligible for federal student aid until the institution has conducted a review to analyze completed enrollment, earned academic credit, and federal student aid paid.

The flags and codes that will be used on the FAFSA to identify students for review are as follows:

UEH Flag Value	"C" Code	Comment Code	Flag Description	School Action to Resolve Flag
N	No	None	Enrollment pattern not unusual	No school action required.
2	Yes	359	Possible enrollment pattern problem. May have received PELL funds at three institutions over two award years.	The school must review enrollment/academic and financial aid records for the past three award years.
3	Yes	360	Questionable enrollment pattern. May have received PELL grant at three or more institutions in one award year.	The school must review enrollment/academic and financial aid records for the past three award years.

Students with UEH flag 2 and UEH flag 3 on their FAFSA will be required to complete and submit the "2023-2024" Unusual Enrollment History" form to the Office of Financial Aid for review to determine whether the student enrolled in multiple institutions solely to obtain a credit balance/refund payment. **Official transcripts for each institution attended must be submitted with the form**. The student will also have to attach a 'statement of explanation' for any course for which no academic credit was earned. The statement can include copies of third party supporting documentation such as medical bills/doctors' reports, military assignment or court documentation of legal events. Additional documents or information may be requested.

For students who earned academic credit at each of the previously attended institutions during 2020-2021, 2021-2022, and 2022-2023, no further action is required, and the student's eligibility for federal student aid can be reinstated. In instances where the student has been awarded a Pell Grant at Montefiore School of Nursing during the review academic enrollment periods, the student may be placed on an academic plan and given counsel about the implications of enrollment history on Pell Grant eligibility.

Federal student aid eligibility will be reinstated when the 'unusual enrollment history' review outcome is that the student did not enroll solely to obtain a credit balance/refund payment, and the transcripts and other documentation support the student's explanation. The student may be placed on an academic plan and given counsel about the implications of enrollment history on Pell Grant eligibility. The U.S. Department of Education "Statement of Educational Purpose" may also be required. Financial aid eligibility for the Pell Grant and campus-based assistance will be awarded for the payment period during which the student regains eligibility. Direct loan eligibility will apply to the award year.

Federal student aid eligibility will not be reinstated when the 'unusual enrollment history' review determines that the documentation does not support or disprove that the student enrolled in multiple programs at multiple institutions solely to obtain a credit balance/refund payment, and the student did not earn academic credit at one or more of the prior institutions.

When federal student aid eligibility is not reinstated, the student may appeal by submitting the "Special Circumstances Appeal" form. Criteria for consideration of the appeal will require that the student has met with an Academic Adviser, been enrolled for three academic terms only in required degree program courses, has not withdrawn officially or unofficially from the courses, and academic credit is earned that meets the standards of federal satisfactory academic progress. Evidence of criteria compliance must be included with the "Special Circumstances Appeal" form. The special circumstances appeal decision is final, and no further consideration will be given to reinstating federal student aid eligibility at Montefiore School of Nursing.

SECTION 8:   STUDENT BUDGETS

8.1   Various Student Populations

A student is assigned a specific budget population, based on the living arrangements, the number of hours they are taking and other associated costs. How Budgets Are Derived & Updated:

The Cost of Attendance (COA) for a student is an estimate of that student's educational expenses for the period of enrollment. MSON uses average expenses for students, rather than actual expenses. If a student is enrolled in a program that has extra fees or costs, such as lab fees, those fees are not added to the student's COA. Instead, a standard cost that is established for all students in a similar program.

A student's cost of attendance generally is the sum of the following:

- Tuition normally assessed for a student carrying an average academic workload ☐ Fees normally assessed for a student carrying an average academic workload.
- An allowance for loan fees.
- An allowance for books and supplies.
- An allowance for room and board.
- An allowance for transportation expenses.
- An allowance for miscellaneous personal expenses.

Budgets are based on program and housing.   MSON uses the follow COA categories:

- Undergraduate Off Campus
- Undergraduate with Parents

Note: Budgets are also adjusted based on the various enrollment levels when a student enrolls less than full time. In most programs, these include three quarter time, half time and less than half time enrollment statuses.

MSON has the authority to use professional judgment to adjust the cost of attendance on a case-bycase basis to allow for special circumstances.

8.2   Additional Costs

There may be additional fees accessed on a per program basis. Fees are updated on an annual basis.

The Institution discloses any fees assessed to students via the MSON website.

SECTION 9:   AWARDING & PACKAGING FINANCIAL AID

9.1   Automatic vs. Manual Awarding/Packaging

The primary strategy for awarding and packaging financial aid is to do everything possible via automation (called Prioritized Packaging in EDEXPRESS) vs. manual. Automated awarding helps insure that accidental manual mistakes do not occur. Mistakes can happen from time to time, but it is our goal to avoid those and be as accurate as possible while complying with all regulations.

Therefore, in the awarding of federal aid, the MSON Office of Financial Aid follows an automatic awarding and packaging strategy. Each award type is programmed into the EDEXPRESS software to award eligible students based on that year's federal regulations. This also helps insure that students are not awarded until verification is complete and all missing documents are resolved. For example, students are awarded Pell grant based on Pell grant award queries in EDEXPRESS and the Pell chart/table which is imported into EDEXPRESS. Student loans are typically automatically awarded based on dependency status and lifetime limit data from the student's ISIR as well as grade level information from the student's academic record in EDEXPRESS.

Some awards require manual packaging. For example, all institutional scholarships have to be entered manually into EDEXPRESS. In addition, when receiving a PLUS loan application, a student's PLUS loan (if approved) or additional unsubsidized loan (if denied) has to be entered manually. But, our standard operating procedure is to allow EDEXPRESS to award and package all students based on preprogrammed settings that comply with all federal regulations.

9.2   Awarding & Packaging Philosophies

 MSON's awarding and packaging philosophy is based upon the goal of helping as many students as possible be able to afford the cost of higher education. We strive to fulfill the mission of MSON by providing accurate, efficient and courteous service to students, parents and other guests while administering all financial aid programs with integrity and compliance to all federal, state and institutional regulations. When awarding various awards with limited funds available, the primary goal is to help students be able to pay off their bill each semester.

1.   Federal Financial Aid

As you can imagine, there are numerous regulations required in the administration of federal financial aid. Some have been outlined throughout this manual, but it is impossible to list all of them in this publication. The Office of Financial Aid follows the regulations outlined each academic year in the Federal Student Aid Handbook as well as other federal publications.

Our primary goal regarding federal student aid is to award students the maximum amount they are eligible to receive, minimize any unnecessary loan debt and comply with all federal regulations.

2.   State Financial Aid Awards

As a private institution, MSON follows all state guidelines to ensure that only eligible students receive state financial aid awards mostly scholarship awards through the New York Education Department (NYED). All state funds are directly awarded to the students, thus, the Office of Financial Aid responsibility to certify enrollment and provide proper reporting to continue these State awards.

3.   Other Outside Financial Aid

Students are encouraged to apply for outside scholarships. In addition, students can take advantage of outside/alternative private loans as needed. MSON awards and disburses all outside financial aid per the instructions and requirements of the organization funding the award.

4.   Institutional Financial Aid

Though some scholarships are based upon merit, the Office of Financial Aid considers financial need whenever possible before awarding any kind of institutional financial aid.

9.3   Available Funds & Number of Eligible Students

The only federal aid programs that are limited to a certain amount, or a number of students, as determined by the school are FSEOG and FWS. State programs are limited based on annual allocation and decision of awards made at the State level.

Student eligibility for limited funds will be determined by the submission date of a clear ISIR, as well as their EFC.

9.4   Determining Award Amounts

Award amounts are often determined by federal guidelines. This includes awards like Pell grant, subsidized and unsubsidized loans and FSEOG. Pell grant uses an annual Pell chart released by ED, and direct loans are awarded based on a student's grade level, annual loan limits, financial need and lifetime aggregate loan usage based on federal mandated limits. The Office of Financial Aid currently awards $3000 for the year ($1500 per semester) for FWS as the initial award amount. Those award amounts can be increased or decreased based upon financial need and available funding. This is the amount an average student could earn if they worked all of their available hours over the course of a 15-week semester. The amount is adjusted at the end of each semester to reflect how much the student actually earned.

Institutional awards are based on each award's individual criteria. Some grants are a certain percentage off tuition. Therefore, the award amount changes based on the cost of tuition and the number of hours a student takes. Other awards have standard amounts (academic scholarship, for example). The President's Office also awards students various awards based on financial need and availability of funds.

9.5   Package Construction

When packaging student awards, all grants, or gift aid, and subsidized funds should be awarded prior to any unsubsidized or private loans being awarded.

Once grants, gift aid, and subsidized funds have been awarded, if the student needs additional funding then the unsubsidized loan may be awarded next.

If the parent is denied a PLUS loan, then the student may be awarded additional unsubsidized funds.

9.6   Packaging Other Educational Resources

Student financial aid awards continue to evolve throughout the school year as they receive new awards or there are updates on a student's FAFSA. When a student receives a new outside award after their initial award has been sent to them, the award package is redone based upon the student's financial need. Work study and loans are adjusted before a student's grant would be adjusted.

9.7   Award Package Notification

When a new student has been awarded their financial aid, they are emailed an award letter. This letter will list all the aid that the student has qualified for and instructions on how to secure the aid for the school year. Continuing students are notified their awards are ready for review through the EDEXPRESS Student Portal.

9.7.1   Award Package Revisions & Recalculations Policy

Financial aid awarding is a continually evolving process. Students are often awarded federal aid first after their FAFSA is received and any required verification or resolution is completed. As other awards are received (scholarships, grants, additional loans, etc.) the student's financial aid package is reevaluated. New scholarships and grants affect a student's financial need. If a student no longer has enough financial need to receive a need-based award (for example, subsidized loans), their award package will be adjusted accordingly. If a student has already been awarded to their COA and then receives a new award, their package will be adjusted to bring the entire package down to the student's COA.

When a student has already been awarded, and a new ISIR is received, the student's award package is reevaluated to determine if any changes need to be made and any conflicting information is resolved.

Anytime there is a change to the student's award(s) a revised award letter is sent and/or emailed. The student can also see and changes to their financial aid in their student portal.

9.8 Over awards & Overpayments

An over award or overpayment must be resolved before the student can receive any further aid. When a student has been over awarded, and it is MSON's fault, MSON returns all governmental funds which reduces the amount of aid the student receives and increases their outstanding school bill. The student does not have to pay back an over award or overpayment to the government because MSON returns the funds. The student must pay any new amount owed on their school bill. When a student has an over award or overpayment from another school, the student must resolve the over award or overpayment and provide MSON with documentation showing that it has been resolved before the Office of Financial Aid will award additional financial aid.

SECTION 10:   PROFESSIONAL JUDGMENT (PJ)

10.1   PJ Authority and Individuals Who May Exercise It

The Administrator Financial Aid may use professional judgment (PJ), on a case-by-case basis only, to alter the data elements used to calculate the EFC. The professional judgment alteration is valid only at the school exercising such judgment. You may submit an adjustment without a signature from the parent or student, and the adjustment must be done electronically, via FAA Access.

The reason for the adjustment must be documented in the student's file, and it must relate to the special circumstances that differentiate the student. You can also use professional judgment to adjust the student's cost of attendance. You must resolve any inconsistent or conflicting information before making any adjustments.

10.2   Using Professional Judgment

The Higher Education Act of 1965, as amended in 1992, allows financial aid administrators to make professional judgment decisions for special or unusual family or student circumstances. These circumstances must be documented. Circumstances requiring professional judgment decisions must be analyzed on a case-by-case basis.

Through professional judgment, the FAO may treat a student with special circumstances differently than the strict application the federal methodology would otherwise permit. Adjustments can either increase or decrease a student's EFC or cost of attendance. In the case of an adjustment to a student's EFC, specific adjustments may be made to data elements. The reason for the adjustment must relate to that student's or family's special circumstances and must be documented in the student's file. Corrections to the SAR will be processed, if necessary. PJ adjustments may increase or decrease a student's EFC or COA. Specified adjustments may be made to data elements, but not to the formula. Adjustments made will apply to all institutional, state and Title IV aid awarded.

An applicant whose FAFSA information is selected for verification will be verified before PJ is performed. Circumstances which may warrant a PJ decision include, but are not limited to the following:

- A change in income of the student's family that would affect the family's ability to pay for college expenses. Examples would be loss of employment, loss of untaxed benefits, a separation or death. Documentation required: verification of change, examples listed on Unusual Circumstance Form.

- Student requests consideration as an independent student. Documentation required: verification of dependency status, examples listed on Request for Independent Status form.

- Excessive medical expenses. Documentation required: Verification of medical expenses paid by family from doctors, hospitals, etc. or a copy of tax return verifying itemized deductions, showing medical expenses.

The required documentation listed for each of these circumstances explains what information is necessary for each situation. The documentation must be complete before approval will be considered. Documentation of PJ decisions will be maintained in the student's financial aid file. PJ situations are unique. Circumstances other than those listed may be considered and will require documentation specific to the situation.

The Administrator of Financial Aid for MSON is the final authority to any and all PJ decisions.

Areas of Administration

Professional judgment decisions may be made to adjust eligibility for all institutional, and Title IV aid. Documentation supporting special circumstances must be maintained in the student's folder.

Staff Authority

The Financial Aid Administrator has the responsibility and authority to adjust a student's eligibility using professional judgment. These staff members are responsible for determining whether a change(s) in a student's information warrants a PJ decision.

Circumstances

Student circumstances which may warrant a professional judgment decision are listed on the Request for A Budget Increase form and the Re-Evaluation Request form.

Dependency override circumstances are reviewed in Section 6 of this manual. If the student's cost of attendance is not accurately reflected in the typical budget, a FA Officer may approve an adjustment in such costs. These adjustments will be based on circumstances such as physical disabilities, unusual transportation expenses, unusual living expenses, medical expenses, or unusual expenses related to their course of study, etc. The review will be based on submission of a written request and documentation.

Student Appeals

Students may not appeal the decisions of the Financial Aid Administrators. If the student submits additional documentation that may better assist in presenting the student's case, the new circumstances will be reviewed by the Financial Aid Administrator (FAA).

Documentation

Financial Aid Administrators are required to document professional judgment decisions. This documentation must be maintained in the student's file. Because professional judgment situations are

unique, specific required documentation may or may not be listed for each case. It is left to the discretion of the Financial Aid Administrator (FAA) to select and determine what constitutes appropriate documentation.

The following general guidelines should be adhered to:
1. Documentation should substantiate the student's situation.

2. Documentation should be from a professional outside the family and not a family member.

3. Documentation about a student's life situation should be collected from more than one person.

SECTION 11:   DISBURSEMENTS

11.1 Definition of Disbursements

Financial aid is considered disbursed when funds are applied to the student's ledger. Each financial aid award has various statuses as the award goes through the process of being disbursed. A status of "OK to Pay 2" signifies that the Office of Financial Aid has sent the award to the Student Billing Office to be applied to the student's ledger.

11.2 Responsibility for Disbursement of Funds and Disbursement Methods

The Office of Financial Aid assures and maintains the accurate and appropriate awarding of aid funds. The Student Billing Office is responsible for crediting the funds to the student's account. This maintains a separation of duties between the party that awards aid and the party that disburses it.

In most cases, the method of disbursement involves the Office of Financial Aid transferring a student's award to the Student Billing Office by creating a batch inside the EDEXPRESS software. The funds are shown on the student's ledger after the Student Billing Office processes and releases that batch. Sometimes a student will receive an outside scholarship check after the start of the semester. When this happens, the Office of Financial Aid will enter the award as a part of the student's financial aid package, and the Student Billing Office will manually enter the funds on the student's billing ledger.

11.3 Disbursement Procedures

The type of financial aid determines the disbursement procedure. In general, federal aid like Pell grant and direct loans are originated and disbursed to COD with an assigned disbursement date. Once the disbursement is approved by COD and the disbursement date has arrived, funds are disbursed to student accounts and applied to each student's ledger by the Student Billing Office. Once funds are applied to a student's account, the Accounting Office draws down the funds from G5. This procedure ensures that request for federal cash does not exceed the amount of funds MSON needs immediately to make aid disbursements to students.

Other outside financial aid is often received through EFT. When this occurs, the Accounting Office lets the Office of Financial Aid know that funds have been received through EFT. The Office of Financial Aids ends the electronic batch through EDEXPRESS, and the Student Billing Office applies the funds to the student's billing ledger.

Regarding institutional financial aid, funds are applied to student accounts after within 3 business days of receipt. and the Accounting Office transfers funds accordingly. Outside scholarships and other financial aid are applied to student accounts after the end of late registration and as funds are received.

11.4 Disbursement Schedule*

Funds are generally disbursed each semester according to the example schedule below. Funds are never disbursed to a student's billing ledger until they have finalized their registration by approving their bill in the student portal.

a. Pell Grant—for students that have finalized their registration by approving their bill in the student portal, MSON will begin disbursing Pell grant funds as early as seven days prior to the start of the semester. Generally, all Pell grant funds will be disbursed by the Tuesday after the census date (last day to withdraw with 100% tuition refund). When an enrolled student submits their FAFSA after the start of the semester or completes verification after the start of the semester, then any Pell grant they are eligible to receive will be disbursed after awarding is complete and the Pell award has been originated and disbursed to the COD website. This can be done throughout the semester as students finalize their FAFSA and become eligible for a Pell grant.

b. Direct Student Loans and PLUS—Students enrolled at least half time must complete three steps in order to receive direct loans funds. These include accepting the loan in the student portal, completing a Master Promissory Note (MPN) and completing loan entrance counseling. (Some PLUS borrowers do not have to complete loan entrance counseling.) In most cases, students complete all of the required steps prior to the start of the semester. In this scenario, direct loans are disbursed the Tuesday after the census date (last day to withdraw with 100% tuition refund). When a student has not completed all three steps, loans will not be disbursed on that date. Once a student does finalize all steps during the semester, direct loan funds will generally be disbursed within seven to ten days.

c. FSEOG—FSEOG funds are generally disbursed after the census date (last day to withdraw with 100% tuition refund). When FSEOG funds are still available after this date, they will be awarded to eligible students during the semester and disbursed within seven days of funds being awarded.

d. Private/Alternative Loans—Private/alternative loans are disbursed to enrolled students once funds are received from the lender.

e. Institutional Aid and Donor Scholarships—Generally, institutional scholarships and grants and donor scholarships are disbursed within two weeks after the census date (last day to withdraw with 100% tuition refund).

f. Outside Scholarships— Outside scholarships are disbursed to student accounts after the census date (last day to withdraw with 100% tuition refund) or as funds are received throughout the semester.

g. Other Aid—Any other financial aid is disbursed to student accounts after the census date (last day to withdraw with 100% tuition refund) or as funds are received throughout the semester.

11.5 Disbursement Notification

Students and parents are notified of disbursement in the student portal. Awards are applied to their billing ledger in the student portal. Additionally, the Student Billing Office sends monthly statement notifying students not only of their outstanding balance but also of the aid that has been applied to their account and the rights they have regarding the cancelation of any disbursed loans.

SECTION 12: SATISFACTORY ACADEMIC PROGRESS

12.1 Process Overview & Responsibilities

Students must make Satisfactory Academic Progress in their course of study to be eligible for financial aid. Federal regulations require schools to develop and apply a consistent and reasonable standard of academic progress. Undergraduate students must complete at least 67% of the courses they attempt and maintain a cumulative GPA of at least a 2.0. Failure to maintain SAP will place a student on financial aid suspension.

The Office of Financial Aid checks each student's academic progress at the end of their enrollment each academic year and notifies them through mail and by emailing addresses if they are placed on suspension. The notification gives the options available to them including the option to submit an appeal of suspension.

A full explanation of the SAP policy and requirements can be found in Montefiore School of Nursing Handbook.

12.2 Appeal Process

If placed on financial aid suspension, the student may petition for the Financial Aid Department to consider mitigating circumstances that resulted in an inability to meet the SAP requirements. The appeal should include an appeal letter with an explanation and any supporting documentation (i.e., medical statements, divorce documents, letters of unemployment, etc.) of the reason(s) the minimum academic standards required by SAP policy are not achieved. Appeals should also include an academic plan. Additionally, students are encouraged to submit a letter of endorsement/recommendation from an MSON faculty/staff member. The appeal letter and documentation should also demonstrate the adverse circumstances have been resolved.

Under normal circumstances, Appeals will be reviewed within 10-14 business days of the Office of Student Financial Aid & Scholarships' receipt of a complete appeal. Notification of the review will be sent via MSON email.

The Financial Aid Suspension Appeal Form can be found on our forms page of the MSON Website.

SECTION 13:   RETURN OF TITLE IV FUNDS

13.1   Introduction

The law specifies how MSON must determine the amount of Title IV program assistance that you earn if you withdraw from school. The Title IV programs offered at MSON that are covered by this law are Federal Pell Grants, Direct Subsidized and Unsubsidized Loans, Direct PLUS Loans, and Federal Supplemental Educational Opportunity Grants (FSEOG).

Though your aid is posted to your account at the start of each semester, you earn the funds as you complete the semester. If you withdraw during the semester, the amount of Title IV program assistance that you have earned up to that point is determined by a specific formula. If you received (or MSON or your parent received on your behalf) less assistance than the amount that you earned, you may be able to receive those additional funds. If you received more assistance than you earned, the excess funds must be returned by MSON and/or you.

A Return of Title IV (R2T4) funds calculation is performed when a student who is awarded federal funds withdraws from a semester of study. The Office of Financial Aid uses software provided by the U.S. Department of Education to complete this calculation. The student's account statement and financial aid record is used in conjunction with this software.

13.2   Estimate of Aid Earned or Aid That May Need to be Returned

The amount of assistance that you have earned is determined on a pro rata basis. For example, if you completed 30% of the semester, you earn 30% of the assistance you were originally scheduled to receive. Once you have completed more than 60% of the semester, you earn all the assistance that you were scheduled to receive for that semester. This means that if a student receiving federal Title IV aid withdraws after completing 60% of the semester, no Title IV funds will be returned. The student is considered to have earned 100% of the Title IV aid for the semester.

Here's an example of how you can estimate the percentage of Title IV aid that you have earned in a semester (enrollment period).

$$\frac{\text{Enrolled Days}}{\text{Days in the Enrollment Period}} = \text{\% of Title IV Earned By Student}$$

You can also compute a rough estimate of the amount that you may be required to repay prior to withdrawing by using the U.S. Department of Education's Treatment of Title IV Funds When A Student Withdraws form.

13.3   Unofficial Withdrawals and Earning All Non-Passing Grades

If you fail to earn a passing grade in at least one of your courses (i.e., all F's, NC's, all I's or a combination of non-passing grades) during a semester, you are considered to have, for purposes of federal Title IV funds, unofficially withdrawn from the Institution. As a result, a federal withdrawal calculation must be performed to determine the amount of Title IV funds that you must repay. The only exception is when MSON can document (within 30 days of the end of the semester) that you should not have been considered unofficially withdrawn. For example, that you were academically engaged after the 60-percent point of the semester or that you did not meet the requirements for administrative withdrawal in an online course.

Once semester grades post, and if you fail to earn a passing grade in at least one of your courses, MSON will perform the federal withdrawal (Return of Title IV) calculation.

13.4   Post-Withdrawal Disbursement

If you did not receive all of the funds that you earned, you may be due a post-withdrawal disbursement. If your post-withdrawal disbursement includes loan funds, MSON must get your permission before we can disburse them. We will contact you via MSON email to offer you a postwithdrawal loan disbursement. Therefore, it is important that you continue to check your MSON email even after withdrawing from a semester. You may choose to decline some or all of the loan funds so that you don't incur additional debt.

 MSON may automatically use all or a portion of your post-withdrawal disbursement of grant funds for tuition, fees, and room and board charges (as contracted with the school). MSON needs your permission to use the post-withdrawal grant disbursement for all other school charges, and this permission is received each semester by each student when you approve your bill and agree to the terms and conditions of registration in your my MSON student portal.

There are some Title IV funds that you may have been scheduled to receive that cannot be disbursed to you once you withdraw because of other eligibility requirements. For example, a student that was awarded federal loans but has not accepted the loans in EDExpress or completed the required MPN or loan entrance counseling cannot receive a post-withdrawal disbursement of loan funds.

13.5   Returning Title IV Funds

Return of Title IV Funds Policy Federal Financial Aid is awarded to students based on the assumption that students will be enrolled for a period of time, such as a semester. Withdrawing will affect financial aid. Dropping classes may also impact financial aid if the student falls below full-time status. Federal financial aid funds that are not earned must be returned.

The first step in calculating Return of Title IV Funds is to determine the withdrawal date. Withdrawal prior to midterm is allowed once during the program of studies. Withdrawal prior to the published date is recorded as a W. Withdrawal after the midterm is recorded as a Withdrawal Pass (WP) or Withdrawal Fail

(WF) depending on the student's achievement in course work at the time of withdrawal. A WF will be included in computation of the GPA. A student may request W/P or W/F until two weeks before the Final Exam. Students should seek counsel with their faculty advisor prior to withdrawal from a course since the program of studies must be completed within a three-year period from the time of admission.

A student who would like to officially withdraw from the program must contact the Coordinator of Student Services. The withdrawal date is the date the student ceased attendance. The last date of attendance is considered the date of withdrawal. The withdrawal date is determined as

follows:
- If the student does not notify the school of his or her withdrawal and unofficially withdraws, the withdrawal date is the last date of recorded class attendance documented by the school. The withdrawal date must be determined by the school within 14 calendar days of the student's last date of attendance.

- If the student notifies the school before he or she stops attending classes, the withdrawal date is the last date of attendance as documented by the school.

- If the student notifies the school after he or she stops attending classes, the withdrawal date is the last date of recorded class attendance documented by the school.

- If the student fails to return from an approved leave of absence or is expelled, the withdrawal date is the last date of recorded class attendance prior to the leave of absence as documented by the school.

- If the student takes an unapproved leave of absence, the withdrawal date is the last date of recorded class attendance prior to the leave.

The last date of recorded class attendance is based on an activity that is monitored by the school, such as submission of assignments, attendance records, examinations, or tutorials. In addition, MSON follows these policies:

- failure to submit a withdrawal form to the Coordinator of Student Services will result in a grade of F for the course;

- only one withdrawal may be taken during the course of studies;

- withdrawal from a course prior to the midpoint is recorded as a W;

- withdrawal from a course after the midpoint is recorded as WP or WF; and a WF is counted as a course failure.

A student must be in good academic standing to be eligible for a leave of absence (LOA). A LOA automatically becomes a resignation after one year. Requests for a LOA must be submitted in writing to the Dean. A verbal request must be followed in one week by a written request.

Following LOA approval from the Dean, students who have received Title IV funds are allowed LOA of up to 180 days in any 12-month period if they make the request in writing and provide a reason for the LOA request. Based on the student's reason for the LOA request and based on the expectation that the student

will return, the Dean may approve the LOA request. If the student does not return, MSON will calculate the refund/return of Title IV Aid based on the last date of recorded attendance. An LOA may have an impact on the student's loan repayment terms including the exhaustion of some or all of the student's grace period. Students not receiving Title IV funds may request an LOA for up to one year. If the LOA was granted for medical reasons, clearance from the Primary Care Provider must be presented to the Occupational Health Nurse prior to return.

On returning to the program of studies, students must comply with current policies. The student must progress at a rate that allows completion of the program within three years of entry into the program. Therefore, if a student takes an LOA for one year, that student will not be permitted any course failures because of time constraints in completing the program.

13.6   Overpayments

Any amount of unearned grant funds that you must return is called an overpayment. The maximum amount of a grant overpayment that you must repay is half of the grant funds you received or were scheduled to receive. You do not have to repay a grant overpayment if the original amount of the overpayment is $50 or less. You must make arrangements with MSON or the Department of Education to return any unearned grant funds.

13.7   Non-Attendance

If you are a Pell Grant or Iraq-Afghanistan Service Grant (IASG) recipient, federal regulations require you to have begun attending the courses for which you are enrolled and receiving these grants. If on the final roll sheet distributed to instructors to confirm attendance, your instructor indicates that you are not attending a course, you are assumed not to have begun attendance for that course. Your grant will then be adjusted or cancelled based on the courses you have actually begun attending.

If you fail to begin attendance in all of the courses for which you are registered, you will have failed to establish eligibility for financial aid. In this situation, you will be required to repay all of the financial aid that you have received.

13.8   Last Date of Attendance Determination for Programs That Take Attendance

For programs that take attendance (undergraduate on campus courses), the Office of Financial Aid uses the student's last date of attendance in calculating whether or not Title IV funds have to be returned to Federal Student Aid. These attendance records are received through EDEXPRESS or instructor records. Additionally, other academic records in EDEXPRESS may be used to help determine the last date of attendance such as when a student submitted an assignment or completed an assessment in EDEXPRESS.

13.9 Last Date of Attendance Determination for Programs That Do Not Take Attendance

For programs that do not take attendance (distance education/ online enhanced courses), the Office of Financial Aid uses the withdrawal date in calculating whether or not Title IV funds have to be returned to Federal Student Aid. When a student in a program that does not take attendance is administratively withdrawn or when a student unofficially withdraws, the Office of Financial Aid will use the midpoint of the semester in calculating whether or not funds have to be returned to Federal Student Aid, unless MSON can show documentation of the student's last academically related activity.

13.10 Federal vs. Institutional Refund Policy

The requirements for federal Title IV program funds when you withdraw are separate from any refund policy that MSON has regarding institutional grants and scholarships or other non-federal financial aid. Therefore**, federal funds may not cover all unpaid institutional charges due to a student's withdrawal, and you may still owe funds to MSON to cover any unpaid institutional charges.** MSON may also charge you for any Title IV program funds that we were required to return. When you approved your bill for the semester, you were emailed a copy of MSON's refund policy to your account. If you do not have access to this or are not familiar with MSON's refund policy, you should contact the Student Accounts at 914-361-6472 to ask for a copy.

13.11 Withdrawal Requirements and Procedures

You may contact the Registrar's Office at 914-361-6472 so that they can provide you with the requirements and procedures for officially withdrawing from school.

When considering withdrawing from the Institution, students are encouraged to contact the Office of Financial Aid first to see how the withdrawal could affect their aid. The Office of Financial Aid will assist the student in making an informed decision. Students can contact Financial Aid at www.finaid@montefiore.org or by calling 914-361-6081.

13.12 Requirements and Deadlines for R2T4 Calculations and Return of Title IV Aid

The following list outlines the requirements and deadlines for the return of Title IV funds.

- Determining withdrawal date: 30 days after the end of earlier of the following (1) Semester (payment or enrollment period), (2) Academic year in which the student withdraws, or (3) Educational program from which student withdrew.

- Return of unearned Title IV funds: No later than 45 days after the date MSON determined the student withdrew.

- Post-withdrawal disbursement to student's account: No later than 180 days after the date MSON determined the student withdrew

- Written notification providing the student (or parent) the opportunity to accept all or part of a post-withdrawal disbursement of Title IV loan funds to the student's account: Within 30 days of MSON's determination that the student withdrew

- Written notification of student's eligibility for a post-withdrawal disbursement of Title IV loan funds in excess of outstanding current (educationally related) charges: Within 30 days of MSON's determination that the student withdrew

- Post-withdrawal disbursement to the student for earned Title IV funds in excess of outstanding current (educationally related) charges: From the date, MSON determined the student withdrew… (1) No later than 180 days for loans and (2) No later than 45 days for grants

- Notification to the student of grant overpayment: Within 30 days of the date MSON determined that the student withdrew.

- Referral of student to Debt Resolution Services: As soon as possible.

- Student (or parent) deadline to submit response instructing MSON to make a post- withdrawal disbursement: Deadline is given in writing when MSON makes the offer of a post-withdrawal disbursement.

- Notification to the student (or parent) of the outcome of a late request for a postwithdrawal disbursement to student: As soon as possible.

☐ Student's deadline to return any unearned Title IV funds: (1) For loans, according to the terms of the loan and (2) for grants, within 45 days of the date MSON sent or was required to send a notice (whichever is earlier).

13.13   Additional Questions

If you have questions about your Title IV program funds, you can contact the Office of Financial Aid at www.finaid@Montefiore.org or 914-361-6081. Additional information is also located within the Montefiore School of Nursing Financial Aid Policies and Procedures Manual. You may also call the Federal Student Aid Information Center at (800)4-FEDAID [(800)433-3243]. TTY users may call (800)730- 8913. Information is also available on Student Aid on the Web at www.studentaid.ed.gov.

SECTION 14: TITLE IV FRAUD AND MISREPRESENATION

14.1 Student Fraud

MSON refers applicants who are suspected of having engaged in fraud or other criminal misconduct in connection with the Title IV programs to the Department of Education's (ED's) Office of Inspector General (OIG). Though rare, fraud can occur when a student turns in documents that are incomplete, misleading, and inaccurate or contain a forged signature.

14.2 Fraud

There are difficult situations where students and/or parents purposefully misrepresent information in hopes of obtaining or obtaining additional assistance. The FAO is required to have a policy of referral when confronted with actual or suspected cases of fraud and abuse.

14.3 Policy for Fraud

Any person who knowingly and willfully embezzles, misapplies, steals, obtains by fraud, false statement or forgery, or fails to refund any funds, assets, or property provided or insured under (Title IV, HEA) or attempts to so embezzle, misapply, steal, obtain by fraud, false statement or forgery, or fail to refund any funds, assets, or property, shall be fined…or imprisoned… (Section 490, HEA)

14.4 Procedures for Fraud

If, in an Aid Administrator's judgment, there has been intentional misrepresentation, false statements, or alteration of documents which have resulted or could result in the awarding or disbursement of funds for which the student is not eligible, the case shall be referred to the FA Administrator for correction and/or possible disciplinary action. After investigating the situation, if the FA Administrator believes there is a fraudulent situation, all information must be forwarded to the Office of Inspector General of the Department of Education or the local law enforcement agency. In addition, all information will be forwarded to the Institution legal office.

The FA Administrator reviews the student's aid file with the appropriate Institution Administrator, and if the decision is made by both Administrators to pursue the possibility of denying or canceling financial aid, a written request to make an appointment is sent to the student. If the student does not make an appointment, the FA Administrator may:

- Not process a financial aid application until the situation is resolved satisfactorily.
- Not award financial aid
- Cancel financial aid
- Determine that financial aid will not be processed for future years.

EXAMPLES OF FSA FRAUD SCHEMES:

- FAFSA Fraud enrollment
- Falsification of entrance exams
- Falsification of GED's/High School Diplomas
- Falsification of attendance
- Falsification of grades
- Front loading
- Failure to make refunds
- Ghost students
- Leasing of eligibility
- Loan theft/forgeries
- Fraud/theft by school employees in trusted positions
- Default rate fraud
- Financial statement falsification

TYPES OF FRAUDULENT INFORMATION:

- U.S. Citizenship Status
- High School Diploma or GED
- Family and Student Income
- Social Security Number Identity Theft
- Default Status of Previous Loan
- Independent Status

HOW TO PREVENT FRAUD:

- Review documents thoroughly for accuracy
- Request additional information as needed
- Compare information on different documents
- Ensure that the staff has adequate training

REPORTING FRAUD:

- Contact the Institution Legal office
- Contact the Inspector General's office by letter or phone

- Referral letter should outline allegations
- Include social security and student ID numbers
- Show specific award years
- Document amount of Financial Aid Disbursed

All processing of the application or disbursement of funds shall be suspended until the FA Administrator has made a determination as to whether the student shall be required to make an appointment. Fraudulent situations should be reported to the hotline of the Department of Education Inspector General at (202) 755-2270 or 1-800-MIS-USED.

SECTION 15: AUDITS

15.1   Audit Process

Federal regulations require the Office of Financial Aid to have its records, and student files audited. MSON is audited by an outside accounting firm on an annual basis. The Accounting Office schedules the audit, and the auditor files the audit with the Department of Education each year. In addition to financial aid records, the Business Offices are audited each year as a part of the same audit to insure that all financial statements are in compliance and submitted as required and on time.

Auditors review a sample of student aid files to ensure that the Office of Financial Aid is in compliance with Federal policies. The auditors submit a preliminary memorandum of findings to the FA Administrator of Financial Aid who conducts research and prepares a response addressing resolution of the specific discrepancy and appropriate procedures to correct faulty processing.

The only preparation for the audit is to cooperate with the auditors' requests. Typically, the auditors will randomly select a specific number of students from each of the Title IV programs. The files are pulled and given to the auditors. Any additional assistance requested is responded to promptly.

A complete listing of financial aid audit guidelines is listed in the Audit Guide published by the U.S. Department of Education.

The FA Administrator of Financial Aid is the liaison between the Office of Financial Aid and the auditors.

Under normal circumstances, Federal regulations require the Institution to have its financial aid records, and student files audited at least once every two years. Each audit must cover the time period since the last audit. Montefiore School of Nursing FAO is audited annually by the State Legislative Auditors and an independent Certified Public Accounting firm. Additionally, the Institution has both system and campus internal auditors that perform scheduled and unscheduled audits and management reviews.

The State Legislative Auditors perform a financial and compliance audit of non-federal funds in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in Government Auditing Standards issued by the Comptroller General of the United States.

The independent Certified Public Accounting firm audits all federal programs in accordance with OMB Circular A133 using the OMB Compliance Supplement (A133 Audit). The Montefiore School of Nursing Board of Directors approves this audit firm.

The Internal Auditor shall perform periodic audits and regular management reviews of financial aid programs and to test established internal controls. The Internal Auditor directly reports to the Executive Vice President.

Prior to an audit being performed, an entrance interview is conducted by the auditors with appropriate Institution officials. During the entrance conference the audit scope, procedures and duration of the audit will be discussed. The Institution makes all program, fiscal, and student records available to the auditors. Representatives from the Financial Aid and Comptroller's offices are available during the audit to provide documentation and answer questions. A draft of the findings is provided to management for a preliminary response.

At the end of the audit, auditors hold an exit conference. During the exit conference, the auditors provide an opinion statement, findings, and recommendations and discuss the draft report. During the exit conference, disagreements are resolved, and the corrective action plan is discussed. A final response to the findings, along with a corrective action plan, is provided to the auditors.

The final audit report is prepared by the auditors and submitted to the President, Montefiore School of Nursing Board of Directors, Federal Audit Clearinghouse, U. S. Department of Education, the New York State Auditor and other appropriate external agencies.

15.2   Preparation

The only preparation for an audit is a standing administrative directive to all concerned employees to cooperate with the auditors and respond to all requests. Typically, the Auditors will randomly select a specific number of students from each of the Title IV programs. The files are pulled and given to the auditors. Any additional assistance requested is responded to promptly.

15.3   Guidelines

A complete listing of financial aid audit guidelines is listed in the Audit Guide published by the U.S. Department of Education.

15.4   Liaison

The FA Administrator serves as the liaison between the FAO and all auditors. Specific questions regarding Stafford Loan procedures are addressed by the FA Administrator. Questions regarding check disbursements, accounts receivables and Pell Grant reports are by the Financial Aid Accountant or a representative from the Business Office.

The United States Department of Education may conduct periodic program reviews. The purpose of the reviews is to evaluate the Institution's management of Title IV programs to ensure compliance with laws and regulations. The Institution cooperates fully with the U. S. Department of Education officials before, during, and after the program review. Records are organized and made readily available for the reviewers.