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Section 1: Manual Introduction

1.1 Introduction to the Financial Aid Office

The purpose of this document is to record policies and procedures governing the delivery of financial aid for students attending the College of Menominee Nation.

The College of Menominee Nation operates at two locations:

Keshena Campus, N172 Hwy 47/55, PO Box 1179, Keshena, WI 54135

Green Bay/Oneida Campus, 2733 S. Ridge Road, Green Bay, WI 54304

The Financial Aid Office is available to serve students from 8:00 a.m. to 4:30 p.m. at the Keshena campus. The Financial Aid Office is available to serve students from 8:00 a.m. to 4:30 p.m. on designated days each week during a semester at the Green Bay Campus. The office will communicate with students concerning the schedule of this day.

Department phone number: 715-799-6226, Ext. 3237

University Website: www.Menominee.edu


Social Media:

https://www.facebook.com/collegeofmenomineenation

https://www.youtube.com/user/CMNKeshena

https://www.instagram.com/cmnedu/

1.2 Purpose and Philosophy of the Financial Aid Office

The College of Menominee Nation has embraced the following Vision:

An American Indian center for lifelong learning, integrating exemplary academic preparation and research to enhance nation building.

Mission:

As a Land Grant institution of higher education chartered by the Menominee People, the College of Menominee Nation infuses learning with American Indian culture and prepares students for leadership, careers, and advanced studies in a multicultural world. The College commits to research and promotion, perpetuation, and nurturance of American Indian language and scholarship.

The Financial Aid office’s mission is to assist students in gaining an education by providing financial assistance to current and prospective students. The Financial Aid Office is dedicated to maintaining accurate records and complying with federal, state and institutional regulations. Through a partnership with students, parents, and numerous offices and organizations, the Financial Aid Office is committed to timely communication and quality customer service.

Operative Financial Aid Principles are adapted from the National Association of Student Financial Aid Administrators. The primary goal is to help students achieve their educational potential by providing appropriate financial resources, and to exemplify the highest level of ethical behavior in helping students and families find the best ways to pay for college. The Office of Financial Aid seeks to demonstrate the highest level of professionalism.

Our principles are:

1. Be committed to removing financial barriers for those who wish to pursue post-secondary learning.

2. Make every effort to assist students with financial need.

3. Be aware of the issues affecting students and advocate their interests at the institutional, state, and federal levels.

4. Support efforts to encourage students, as early as the elementary grades, to aspire to and plan for education beyond high school.

5. Educate students and families through quality consumer information.

6. Respect the dignity and protect the privacy of students, and ensure the confidentiality of student records and personal circumstances.
7. Ensure equity by applying all need analysis formulas consistently across the institution's full population of student financial aid applicants.

8. Provide services that do not discriminate on the basis of race, gender, ethnicity, sexual orientation, religion, disability, age or economic status.

9. Recognize the need for professional development and continuing education opportunities.

10. Commit to the highest level of ethical behavior and refrain from conflict of interest or the perception thereof.

1.3 Policies and Procedures Development Responsibilities

Financial Aid Policy development adheres to Federal and State laws and regulations as well as the mission of the College of Menominee Nation. Policies are reported to and approved by the institution's Cabinet Policy Committee, and the Board of Directors as appropriate.

1.3.1 Responsible Personnel

The Financial Aid Manager is responsible for institutional policy development surrounding the delivery of financial assistance.

1.3.2 Documents and Methods

Financial Aid reference documents and publications used to develop policies and procedures include:

- Federal Registers
- Notices of Proposed Rulemaking
- Audit Guide
- Federal Student Aid Handbook
- Dear Colleague/Partner Letters
- Electronic announcements
- Student Financial Aid Guide
- Email updates
- FSA Partners Web site: https://fsapartners.ed.gov/home/

The Financial Aid office also refers to newsletters from State, Regional and National Organizations. The National Association of Student Financial Aid Administrators Today’s News provides regular updates and alerts regarding Department of Education activities. Additionally, the Office of Financial Aid receives correspondence from State and Tribal Agencies. Relevant articles from the Chronicle of Higher Education are also referenced.

1.4 Implicit Bias Awareness & Individual Development Policy

1.X - Reserved for Institution Use
Section 2: Administrative Organization and Office Management

2.1 Institutional and Divisional Structure

The Office of Financial Aid reports to the Director of Advancement and Enrollment. There exists a clear and separate division of responsibility for the administration of financial aid programs, which are divided between the Financial Aid Office, and the Finance Office. In order to maintain this division, each office is accountable for separate responsibilities in Title IV aid administration.

2.2 Financial Aid Office Structure and Position Responsibilities

The Financial Aid manager is responsible for the day to day function of providing financial aid services to the students of College of Menominee Nation. The Financial Aid Manager provides for the determination of aid eligibility, packaging of student aid and submission of required reports in accordance with guidelines and regulations provided by the College, Tribal, Federal and State Governments, and other private funding sources. The Manager seeks to develop an office that is proactive in working with families and students to plan and apply for funding that help finance their education at CMN. The Manager strives to provide a hospitable and welcoming environment. In addition, the manager promotes early and regular interaction with families about the intricacies of financial aid, financing an education, and the timely resolution student accounts.

2.2.1 Personnel Policies

Policies

Personal policies are maintained by the College of Menominee Nation Human Resources Department.

Procedures

Performance evaluations are conducted annually. The evaluation form provided by the Human Resources Department is used for the Financial Aid Office employees. Forms must be completed by Director/Immediate supervisor, in accordance with the College of Menominee Nation's personnel policies and procedures. All requests for absences must be approved by the assigned advisor.

2.3 Frequent Contact Information

The Office of Financial Aid at CMN works with campus partners to administer Federal student aid.

Director of Enrollment and Advancement,
Office of Admission
Registrar's Office
Records & Billing Office
Student Achievement Specialists

2.3.1 Third-Party Servicers

Resources:
668.16(b)(3)
668.16(c)
668.16(b)(4)
2022-23 FSA Handbook, Vol. 2, Ch. 3, August 2022

Resources:
668.16(b)(2)
668.16(b)(1)
28 CFR 35
2022-23 FSA Handbook, Vol. 2, Ch. 3, August 2022
28 CFR 36.301-311
34 CFR 104

Resources:
2 CFR 3485
601.21
668.14(b)(28)
34 CFR 84
2022-23 FSA Handbook, Vol. 2, Ch. 3, August 2022
668.14(b)(27)
668.14(b)(18)(i)
2022-23 FSA Handbook, Vol. 2, Ch. 6, August 2022
668.14(b)(18)(iii)
668.14(b)(22)
2022-23 FSA Handbook, Vol. 2, Ch. 1, August 2022
668.14(c)(1)
668.16(d)(2)
Federal Register, 7/28/09, p. 37446

Resources:
668.16(b)(3)
668.16(b)(4)
2.4 General Financial Aid Office Administration

The Financial Aid Office is available to serve students from 8:00 a.m. to 4:30 p.m. Monday through Friday at the Keshena campus. The Financial Aid Office is available to serve students from 8:00 a.m. to 4:30 p.m. on designated days each weeks during a semester at the Green Bay campus. The office will communicate with students concerning the schedule of this day. The office is also available by email and phone during the work week.

Generally the Office of Financial Aid follows the following monthly calendar of activities:

JANUARY -
* Award Spring Financial Aid Applicants
* Spring orientation

FEBRUARY -
* Tentative Campus Based Allocations received
* Update Cost of Attendance for new award year.
* Disburse Financial Aid to eligible students
* EZ Audit Due

MARCH -
* Official Notice of Funding for Campus Based Allocations
* Load New-Year ED Software
* Empower (College of Menominee Nation Student Information System) rollover to new year
* Request campus-based waiver

APRIL -
* Wisconsin Association of Student Financial Aid Administrators Conference

MAY -
* Award summer financial aid applicants
* Graduation
* Spring SAP and R2T4 calculations processed
* Begin awarding fall financial aid applicants

JUNE -
* Disburse summer school aid
* Veterans certifying officials conference
* Spring reconciliation conducted
* NASFAA Conference

JULY -
* NASFAA Dues are due
* Summer reconciliation conducted

AUGUST -
* Fall orientation
* Summer SAP and R2T4 calculations processed

SEPTMBER -
* FISAP

OCTOBER -
* External Audit Binder

NOVEMBER -
* FISAP Edits
* Spring Semester Awards
* Wisconsin Association of Student Financial Aid Administrators Conference

DECEMBER -
* Fall reconciliation
* Federal Student Aid Conference
* Fall SAP and R2T4 calculations processed
* External Audit

2.4.1 Accommodations for Disabilities

Policies

Information concerning students with disabilities is listed on the CMN website. The Student Achievement Specialist provides information and assistance to students with disabilities who are in need of special accommodations.

Resources:
28 CFR 35
28 CFR 36
34 CFR 104
2022-23 FSA Handbook, Vol. 2, Ch. 6, August 2022

2.4.2 Staff Customer Service Interactions

Policies

The Office of Financial Aid seeks to provide service to students in a hospitable and welcoming way. Telephone calls are answered in a friendly and professional manner. Students and their families are not required to make appointments with the Office of Financial Aid. Walk-ins are welcomed. However, appointments can be made by calling the office to schedule them as well.

Resources:
668.16(h)

2.4.3 Treatment of Correspondence/Forms

Procedures

General correspondence is routed by the Financial Aid Manager to the Director as necessary. Where appropriate, correspondence should be responded to within one week. The Director responds to all complaints either orally or in writing.

Resources:
GEN-01-06
2022-23 FSA Handbook, Vol. 2, Ch. 7, August 2022

2.4.4 Incoming Electronic Communications

Policies

Incoming calls be directed to the main Office of Financial Aid 715-799-6226 or 800-567-2344. The Financial Aid Manager's extension is 3237.

Procedures

Incoming calls will be answered by the Financial Aid Manager or Financial Aid Assistant.

2.4.5 Confidentiality of Student Records

Policies

All records and conversations between an aid applicant, his/her family and the staff of the Office of Financial Aid are confidential. Individuals are entitled to protection ordinarily given in a counseling relationship. The College of Menominee Nation assures the confidentiality of student educational records in accordance with institutional policies, state and federal laws, including the Family Educational Rights and Privacy Act (FERPA) of 1974 as amended.

Resources:
16 CFR 313.3(n)
16 CFR 314
34 CFR 99
GEN-16-12
Procedures
Currently enrolled and former students have the right to review their records to determine their content and accuracy. A student who wishes to obtain access to his/her financial aid record is able to do so in the presence of a Financial Aid Office employee.

2.5 Records Management and Retention

Policies
The Office of Financial Aid maintains a master record for each student receiving financial assistance.

Resources:
668.14(b)(4)
668.24
676.19(b)
674.19(e)
675.19(b)
682.610(b)
685.309(c)
686.38
690.82(a)
2022-23 FSA Handbook, Vol. 2, Ch. 7, August 2022

Procedures
All financial aid folders are retained for five years. Any records involved in any claim or expenditure which has been questioned by federal audit are retained until the question is resolved. Inactive records are kept in the Financial Aid office for five years. At the end of each semester, inactive files are moved to storage in the Financial Aid Manager's office. Records are destroyed after a certain time.

2.5.1 Safeguarding Electronic Records

Policies
The purpose of College of Menominee Nation's data security policy is to protect the rights and privacy of individuals, including staff, students and others. The privacy rights of individual's regarding the processing of their personal data by those who control such data is the forefront of this policy.

Procedures
CMN requires users to access and use information for which they have been given authorization or that their job duties require. Users must also follow the information usage procedures, policy standards, and guidelines established by CMN.

The data security procedures and guidelines that apply are:

1. Obtain and process the data.
2. Keep only for one or more specific and lawful purposes.
3. Use and disclose only in ways compatible with the purposes for which it was initially given.
4. Keep safe and secure.
5. Keep accurate, complete, and up-to-date.
6. Ensure that it is adequate, relevant, and not excessive.
7. Retain no longer than is necessary for the specified purpose or purposes;
8. CMN will provide a copy of there personal data to any individual, on request.

The college has a responsible marketing policy and does not give details of its customers or related individuals to any other organization without their explicit authorization.

Information Classification
This policy applies to CMN staff, students, faculty, adjunct, temporarily employed staff, and contractors or at any time of employment that is affiliated with CMN. This applies to the use of personal computers, CMN's website, and CMN's intranet.

1. CMN's Intranet: The intranet is the internal website of CMN. This site is designed for the use and...
benefit of employees to assist in their day-to-day jobs and support college business functions. It is also a key communication tool used by CMN to provide timely and accurate information to all employees.

2. CMN's website: the external web pages located under www.menominee.edu produced by the College of Menominee Nation.

3. Personal computers: This can include but is not limited to the PC located on the employee's desk, laptops, tablets purchased and used within a department, and laptops and tablets checked out from IT.

Information Classification levels will be adopted by CMN and support the principles of information security. These classification data have definitions of Personal Data in Level, Type of data and Categories and are designed to cover both primary and secondary research data in level.

1. **Confidential**: CMN information is classified as confidential if it falls outside the restricted classification, but is not intended to be shared freely within or outside the CMN due to its sensitive nature and/or contractual or legal obligations. As defined by FERPA, examples of confidential information included all non-restricted information contained in personal files, misconduct and law enforcement investigation records, internal financial data, donor records, and education records. Confidential information must be protected. Sharing of confidential information may be permissible if necessary to meet the college's legitimate business needs. Unless disclosure is required by law (or for the purpose of sharing between law enforcement entities), when disclosing confidential information to parties outside of CMN, the proposed recipient must agree (i) to take appropriate measures to safeguard the confidentiality of the information; (ii) not to disclose the information to any other party for any purpose absent the CMN's prior written consent or a valid court order or subpoena; and (iii) to notify CMN in advance of any disclosure pursuant to a court order or subpoena unless the order of subpoena explicitly prohibits such notification.

2. **Restricted**: restricted data is the collection, storage and or transmission of data. Restricted information must be held in such a manner that prevents unauthorized access. Restricted information may become classified as confidential, thereby requiring a higher level of access control. It is only for the personnel authorized to have a category of level or have an authorization. Restricted data includes social security numbers, driver license numbers, state-issued non-driver ID numbers, Federally recognized tribal ID cards. Sharing of restricted information within the college may be permissible if necessary to meet the college's legitimate business needs. Except as otherwise required by law (or for the purpose of sharing between law enforcement entities). No restricted information may be disclosed to parties outside the college, including contractors, without the proposed recipient's prior written agreement.

3. **Unrestricted or Internal Use**: This falls within the restricted category, confidential category, and cannot be shared freely outside CMN. The data information can be disclosed or disseminated by its owner to appropriate members of CMN. Information may be shared outside of CMN if necessary to meet the college's legitimate business needs, and the proposed recipient agrees not to re-disclose the information without the college's consent.

4. **Publicly Available**: It is intended to be shared to anyone inside or outside of CMN. The information can be disclosed or disseminated without any restrictions or content, such as marketing materials, and public facing websites. The information must not violate any regulations or any applicable laws or regulations, such as privacy rules. The public has to get approval from CMN to use public information. If approved by CMN, information cannot be used in an explicit manner.

The procedures that relate to data information either individually, control or shared have requirements in each classification of CMN's website, CMN's intranet, and personal computers. The personal data relating to either staff, students, and the public who interact with CMN's data security policy must comply with the following:

1. **Conditions of use including policies and procedures**: Authorized staff is responsible for ensuring that all data is kept securely. Staff must not disclose personal data to any third party. CMN will allow authorization or agreement of designated data that is in compliance with the CMN data security policy.

2. **Compliance**: Staff students and public all have access to the internet for acceptable policy of
using the CMN's internet services. They will make a request under the data protection policy. Rules can be made for individual departments concerning access to internet services. Regulations will be for the grade of security or level of internet access by supervisor of the department.

3. Remote Access. Access to personal files and material via work from home will be approved by staff supervisor. Before leaving your workstation personal computers must be locked. Access to email, intranet and individual data is via the web access only. User will be disciplined if breach of policy via remote or output zip drives or USB sticks are unauthorized by supervisor. Protection of sensitive areas of data collection in the course of financial services, students and faculty or staff will be categorized and by level according to their supervisor.

4. New users of CMN website -- students and visitors/guest/public accounts. The users will be in agreement to the compliance of CMN's data security policy.

5. Individual system access rights and supervisors. Data level access will be confidential, restricted, unrestricted or internal access. Data requests must be utilized at improving or directly supporting CMN's operations, students and staff. CMN staff must adhere to all relevant state and federal laws in their use and dissemination of data. All external data requests and internal requests will be approved by the immediate supervisor and labeled confidential. Processing personal data in any manner must be authorized by the immediate supervisor and allow use for the purpose of carrying out job duties.

2.6 Information Sharing and the Family Educational Rights and Privacy Act

Policies
The College of Menominee Nation adheres to the Family education Rights and Privacy Act (FERPA). FERPA grants the following rights to adult students and gives parents certain rights with respect to their dependent children's educational records. These rights transfer to the student when he or she reaches the age of 18 or attends a college beyond the high school level.

Procedures
Students have the right to inspect and review their own student education records maintained by the College. CMN is not required to provide copies of records unless, for reasons such as great distance, it is impossible for parents or eligible students to review the records. CMN does not charge a fee for copies. Students have the right to request that the College correct records that they believe to be inaccurate or misleading. If the College decides not to amend the records, the student then has the right to a formal hearing. After the hearing if the College still decides not to amend the record, the student has the right to place a statement with the record setting forth his or her view about the contested information. Generally the College must have written permission from the parent or eligible student in order to release any information from a student's education record. FERPA does allow colleges to disclose those records without consent to the following parties:

* College officials with legitimate educational interest.
* Other colleges to which the student is transferring.
* Specified College officials for audit or evaluation purposes.
* Accrediting organizations
* To comply with judicial orders or lawfully issued subpoenas
* Appropriate officials in the cases of health and safety emergencies.

At its discretion, the College may provide directory information in accordance with the provisions of the Act. Students may withhold directory information by notifying the Registrar in writing within two weeks after the first day of class for any given term. Inquiries concerning compliance can be directed to the Chief Academic Affairs Officer College of Menominee Nation, PO Box 1179, Keshena, WI 54135 (715)799-5600, extension 3019.

2.6.1 Internal Disclosure

Policies
College of Menominee National employees may request specific student information from the Office of Financial Aid if those officials have a legitimate educational interest in making the request.

Resources:
99.2
99.31
99.3, Directory information, Disclosure, Education records
99.30
99.8
Electronic Announcement, 9/5/17
99.7
99.10
99.12
99.20
99.34
99.37
2022-23 FSA Handbook, Vol. 2, Ch. 7, August 2022

Resources:
99.31(a)(1),(9)-(11),(13)-(14), (16)
99.33(a)
2.6.2 External Disclosure

**Policies**

The College of Menominee Nation will release student records to other colleges to which a student is transferring, accrediting organizations, auditors, and to comply with a judicial order or lawfully issued subpoena. Students can authorize the release of their protected records.

Additionally, in cases where officials are acting in a case of health or safety emergency.

**Procedures**

Students can authorize the release of educational records that would normally be protected by completing a FERPA Release Document: http://www.menominee.edu/pdfs/forms/FERPA%20Release%202020%20Fillable.pdf

2.6.3 Authorization Consent Form

**Policies**

Students can authorize the release of their protected education records via a written request.

**Procedures**

Students should complete the required document release form and submit it to the Registrar.

2.6.4 Information Release via Telephone

2.6.5 FERPA Related Recordkeeping Requirements

2.X - Reserved for Institution Use
Section 3: Financial Aid Programs

3.1 Institutional Eligibility Requirements

The College of Menominee Nation is a private nonprofit institution of higher education established in 1994 through a charter by the Menominee people. CMN is one of three land grant institution’s in Wisconsin through the Federal land grant program. CMN is accredited by the Higher Learning Commission and has been selected to participate in HLC’s Quality Academic Improvement Program.

Resources:
600.7
600.7(b)(1) - (2)
600.7(c)
600.10(d)
600.20(b)(2)
600.20(e)(3)
668.13(b)
668.14(g)
668.14(h)

Policies

CMN is Fully Certified to participate in the Title IV, Hea Programs Until June 30, 2028. The application for recertification is due March 31, 2028.

Procedures

The Financial Aid Manager will create calendar specific dates to prepare the recertification application as required.

The documents required are collected by the FA Manager and the entire application is reviewed by the Director of Advancement and Enrollment. The application material is submitted to the President who will affirm is completeness by signing the recertification application.

3.1.1 Program Eligibility

Policies

CMN offers bachelor’s and associate degrees as well as technical diplomas. The academic year at CMN begins July 1 and ends June 30. It is comprised of two semesters that run 16 weeks. The summer semester is a trailer for the purposes of Title IV Aid administration and is 8 weeks. All academic programs are measured in credit hours. A bachelor’s degree is 121 to 124 credit hours. An associates degree is 60 to 65 credit hours. Technical diplomas will vary from 27 to 31 credit hours and can be completed within one academic year or two semesters if a student enrolls fulltime. The technical programs result in a diploma which allows students to achieve national and state certification, apply for apprenticeships and enter employment.

Resources:
P. L. 113-235
HEA 484(d)(2)
600.2, State authorization reciprocity agreement
600.9(a), (b)
600.14(b)(26)
668.232(b), (c), (d), (e)
668.233(a),(c)
Federal Register, 7/3/18
Federal Register, 6/24/14, pp.

Resources:
600.2, Clock hour, Credit hour, Educational program
668.2 (b), Subscription-based program
668.3
668.8
2022-23 FSA Handbook, Vol. 2, Ch. 5, August 2022
668.8(a)
668.8(b)
668.8(c)(3)
668.8(d)
668.8(e)
668.8(g)
2022-23 FSA Handbook, Vol. 3, Ch. 1, July 2022
668.8(k), (l)
668.10
668.14(b)(26)
668.231
668.232
Electronic Announcement, 11/5/19
668.236
Procedures
CMN has an established program justification procedure. The academic department preparing the request will take the request to the Committee on Academic Quality. It is recommended that the department check with the Office of Financial Aid regarding student aid eligibility, especially if the program is a technical diploma or certificate program. Once institutional approval is secured, the program will be submitted to the Higher Learning Commission Accreditation Liaison Office. HLC approval for the program is necessary before the program can be launched. If HLC approval is granted, the Office of Financial Aid Manager is notified. It is the responsibility of the OFA Manager to re-submit the program participation agreement, if necessary, for the new program. It is the responsibility of the CMN Financial Aid Manager to insure there is no federal aid provided to students in a program that has not approved through the program participation agreement.

3.1.1.1 Ineligible Programs

Policies
CMN would consider any program established for less than one academic year an ineligible program. If the program did not result in a recognized educational credential, it would be ineligible as well.

Procedures
Currently there are no ineligible programs at CMN.

3.1.1.2 Evaluation of New Programs

Policies
See the policy and procedure described in 3.1.1., CMN Program Justification Process

Procedures
See the procedure described in 3.1.1.

3.1.2 Administrative Capability

The College of Menominee Nation strives to comply with the requirements of administrative capability as required an eligible institution to administer Federal Financial Aid. CMN has full certification to participate in the Federal programs. It is the goal of the institution to demonstrate administrative capability to keep full certification.

3.1.2.1 Provisions
Procedures

The Office of Financial Aid, directed by the Financial Aid manager under the leadership of the Director of Advancement and Enrollment, has primary responsibility for insuring the institution's eligibility. The Financial Aid Manager works closely with the following offices as it relates to administrative capability: Registrar's Office: Room 101M Glen Miller Hall, 800-567-2344, extension 3013 -- assists with the monitoring of enrollment, satisfactory progress maintenance, enrollment reporting. Student Billing Office: Room GM101F, Glen Miller Hall, 800-567-2344, extension 3013 -- assists with the management of Title IV funds, disbursement of aid to institutional charges, accesses and returns as required. Title IV aid through G5 system, is responsible for compliance with cash management statutes and regulations. Retention Office: Campus Commons, 800-567-2344, extension 3089 -- assists with development of academic plans for all students, including those on satisfactory academic progress plans. Admissions Office: Welcome Center, Glen Miller Hall, 800-567-2344, extension 3051 -- assists with insuring admitted students are eligible for Title IV aid by documenting high school graduation, identifying admitted students who may already have a bachelors degree.

3.1.2.2 Administration

Policies

The Financial Aid Manager is responsible for administering and coordinating the institution's financial aid programs. All information received by the institution relating to Federal Title IV student aid should be routed to the Financial Aid Manager. The Financial Aid Manager can be assisted by other staff as needed.

Procedures

The Financial Aid Manager, Austin Retzlaff, is primarily responsible for compliance with Title IV aid administration. He is supported by the Dean of Students, Tessa James. The Financial Aid Office partners with the office of Student Records and Billing and its Coordinator, Denise Madosh for the disbursement and cash management of federal funds. See section 3.1.2.1 for other campus

3.1.2.3 Responsibilities of Institutional Offices

Policies

There exists a clear and separate division of responsibility for the administration of financial aid programs which are divided between the Financial Aid Office and the Finance Office.

Procedures

The Financial Aid Office is responsible for awarding Federal student aid and preparing required reports to the Federal Department of Education. The Finance Office is responsible for the disbursement of Title IV aid through student accounts. Both offices participate in a regular monthly reconciliation of awards and disbursements to insure compliance with cash management requirements. The Financial Aid Manager is responsible for submitting the disbursement records in the COD system. The Business Office is responsible for drawing down FSA funds.

3.1.2.4 Separation of Duties

Policies

The institution has established the following areas of responsibility for the Office of Financial Aid:

1. Prepare required reports and reconciliation.
2. Maintain financial aid records support.

Resources:

668.16(a)
2022-23 FSA Handbook, Vol. 2, Ch. 3, August 2022

668.16(b)(1), (2), (3)

668.16(b)(4)

668.16(c)
2022-23 FSA Handbook, Vol. 2, Ch. 3, August 2022
5. Maintain accurate records in financial aid systems.
6. Coordinate Federal Work Study (FWS).
7. Coordinate state grants and scholarships.
8. Provide customer service.
9. Award and distribute financial aid to students.
11. Develop written policies and procedures relating to financial aid administration.
12. Provide financial aid workshops.
13. Properly package student financial aid.
14. Monitor and maintain Title IV regulations.
15. Monitor Student Academic Progress (SAP)
16. Perform R2T4 (Return to Title IV) calculations.

The institution has established the following areas of responsibility for the Finance Office:

1. Maintain and disburse accurate bills.
2. Collect payments for student accounts.
3. Disburse student aid funds to students.
5. Maintain student accounts.
6. Maintain accurate accounting records of Title IV funds.
7. Conduct reconciliation of Title IV funds.
8. Provide Title IV funds balance with the Office of Financial Aid.
9. Provide work study payroll reports to the Office of Financial Aid.
11. Complete annual audit within the required time frame.
12. Attend training sessions provided by the Federal Department of Education.
13. Keep informed of Title IV management regulations.
14. Follow the practices outline in the Federal Department of Education handbook.
15. Assist with policy development and implementation.

**Procedures**

See Section 11, Disbursements for procedures that ensure the separation of functions.

### 3.1.2.5 Records

**Policies**

The Office of Financial Aid retains all required files for five years as required.

**Procedures**

A master record for each student receiving financial assistance is maintained by the personnel in the Office of Financial Aid. The required time frame is five years. Any records involved in any claim or expenditure which has been questioned by federal audit are retained until the question is resolved.

Inactive records are kept in the Financial Aid Office for five years. At the end of each semester, inactive files are moved to storage in the Financial Aid Manager's office. Records are destroyed after a certain time.

**Resources:**

668.14(b)(4)
668.16(d)(1)
668.24
676.19(b)
674.19(e)
675.19(b)
682.610(b)
685.309(c)
686.38
The Financial Aid Manager will typically review student files retained in the office to determine if that file should be retained to comply with the record retention requirements or if it can be destroyed/shredded.

### 3.1.2.6 Electronic Processes

**Policies**

The Office of Financial Aid is compliant with the requirements to be able to fully participate in the electronic processes required by ED. The institution uses the Empower student information system as its financial aid management software.

https://www.empowersis.com/

**Procedures**

CMN uses ED Connect to access the electronic application for Federal student aid (ISIRs). ISIR records are uploaded from the ED Central Processing System through ED Connect into the Empower System. CMN provides monthly enrollment reports using a third party servicer, the National Student Clearinghouse, are submitted to the National Student Loan Data system.

CMN uses the provided software by ED to calculate the Return of Title IV funds. CMN uses the COD system to provide Federal Pell grant disbursement information. CMN submits the FISAP annually on the campus based system accessed through COD. Currently CMN does not use electronic signatures from applicants. Verification documents require written signatures. The Financial Aid Office will also accept scanned or PDF versions of verification documents which includes images of the signature. The Statement of Educational purpose does require the original document with the actual signature.

### 3.1.2.7 Checking Validity of High School Completion

**Policies**

The College of Menominee Nation is an open-enrollment institution. In order for a student to be admitted as a degree seeking the student must submit a high school diploma or high school equivalency diploma (HSED), or a General Education Diploma (GED).

**Procedures**

The Office of Admissions for CMN only accepts official high school/college transcripts. These documents must be sent from accredited/active institutions. The Admissions Officer reviews the applicants high school transcript to validate if it is an official document, which would include the following: the High School seal, graduation date and signature of a high school official. If the Admissions Officer has reason to believe the document is invalid, the following steps will be taken to validate the high school transcript:

1. Confirm the high school is accredited and active by contacting the school directly (by State) or by searching the U.S. Department of Education’s Database for Schools.

2. Request an additional transcript directly from the student’s high school.

3. If a prospective student graduated from a high school outside of the United States it will be the applicants responsibility to have their transcript evaluated by a company that provides such a service.

If an applicant submits a GED or HSED Diploma, the Admissions Officer will review the submitted document to insure it has a State Seal, Diploma Date and signature of a certifying state official. If the Admissions Officer has reason to believe the document to be invalid a fax or email request to the Wisconsin Department of Public Instruction or the State from which the student obtained the diploma will be made to confirm authenticity.

If an applicant is home schooled, the Admissions Officer must review the students Home school...
Transcript to validate if it is an official document. It would include the following:

1. Reliance on a home school student's self-verification that they completed secondary school in a home school setting.
2. The student can include in his/her homeschooling self-certification that he/she received this state credential.
3. Request letters of recommendation, personal interviews, and portfolios of work and accomplishments can augment mandatory application materials.

3.1.2.8 Information Discrepancies

**Policies**

It is the responsibility of the Financial Aid Manager in consultation with the Admissions Director to determine if a prospective or current student has submitted fraudulent information.

**Procedures**

CMN is a small institution and consequently there is frequent and regular collaboration between school officials. In cases where the Financial Aid Manager receives an ISIR with information that may conflict with the admissions information provided or vice versa, the two administrators will consult. Typically the student will be contacted and asked about the conflict. In cases where there is agreement among administrators that there is a potential case of fraud, the Financial Aid Manager will contact the Office of the Inspector General. See Section 15.

3.1.2.9 Reviews & Proceedings

**Policies**

CMN strives to demonstrate administrative capability by participating in annual compliance audits by an independent auditor as required. CMN fully cooperates with any additional audits that may be conducted by ED, an accrediting agency or a state agency.

**Procedures**

CMN is currently under full certification with the Department of Education. The CMN Business Office is primarily responsible for insuring audits are submitted on time. See Section 16. The institution recognizes that timely and thorough clean independent audits are a key to keeping this full certification.

3.1.2.10 Cohort Default Rates

**Policies**

The College of Menominee Nation does not participate in the Federal Direct Student Loan program.

**Procedures**

This is not applicable for CMN.

3.1.3 Financial Responsibility

CMN is a tribally controlled institution, governed by a Board of Directors comprised by tribal members. The

**Resources:**

668.16(f)
2023-24 FSA Handbook, Vol. AVG, Ch. 5, December 2022

668.16(g)
2022-23 FSA Handbook, Vol. 2, Ch. 3, August 2022

668.16(j)
668 Subpart N
674.5
GEN-14-03
GEN-05-14
Cohort Default Rate Guide, September 2020
2022-23 FSA Handbook, Vol. 2, Ch. 4, August 2022
3.1.4 Reporting & Reconciliation

3.1.4.1 Fiscal Operations Report and Application to Participate

**Policies**

The Financial Aid Office applies for funds through the Fiscal Operation Report and Application to Participate (FISAP). The Financial Aid Office applies annually for federal funds through the FISAP, which is submitted each September.

**Procedures**

The Financial Aid manager and Institutional Research Department work together to collect the necessary statistics to complete the report. The manager loads the finalized data into the Electronic FISAP program and the information is sent electronically to the Department of Education. The signature page and required certifications are sent by certified U.S. Postal Service Mail.

3.1.4.2 National Student Loan Data System

**Policies**

Data is submitted monthly to the National Clearinghouse which is contracted by CMN to reports to the National Student Loan Data system.

**Procedures**

The Registrar’s office is responsible for providing this information to the National Student Clearinghouse every 30 days. It is the responsibility of the Registrar to resolve any errors or conflicts that may be identified by the Clearinghouse.
3.1.4.3 Program-Specific Reporting

Policies

Pell Grant reconciliation is the process by which a school reviews and compares Pell Grant data recorded on the Department of Education's system with the information in the school's internal records. It is the responsibility of the Financial Aid Office Manager in collaboration with the Student Records and Billing Coordinator to complete reconciliation each month.

Procedures

At the beginning of each month, the financial aid office will request the reconciliation report from the Common Origination and Disbursement System (COD). This report is uploaded into CMN's Empower (Student Information) System. A comparison occurs with Pell Grants disbursed to students and the records housed in COD. The Financial Aid Manager and the Student Records and Billing Coordinator will work together to resolve discrepancies. Once discrepancies are resolved, the Financial Aid manager will meet with the business office to make sure the institution's Empower system and COD match up with the G5 account information. If any discrepancies are found, the two offices will work together to reconcile them. Once records are confirmed as accurate, the Financial Aid manager will update its monthly reconciliation report.

In addition to regularly monthly reconciliation of the Pell Grant program, ED mandates colleges have a final reconciliation as soon as possible after final scheduled disbursements are made for the award year. The final reconciliation will ensure all data is correct, and that Total Net Drawdowns equal Net Accepted and Posted Disbursements in COD. The data submission deadline is published annually in a Federal Register notice. It typically is the end of September following the end of the award year. Schools can confirm closeout via the school balance confirmation page on the COD website once your school has completed its final reconciliation and reached a $0.0 Cash > NAPD Balance.

3.1.4.4 Non-Title IV Program-Specific Reporting

3.1.5 Copyright Infringement and Peer-to-Peer File Sharing

Policies

It is the responsibility of the Information Technology Department to combat the unauthorized distribution of copyrighted materials by users of the CMN computer network.

Procedures

It is the responsibility of the CMN Information Technology Department to monitor usage of the institutions network to ensure no copyrighted materials or peer-to-peer file sharing occurs.

3.2 General Title IV Student Eligibility Requirements

Policies

The Admissions Office at CMN has the responsibility for processing a prospective student's application to the College. Failure to properly adhere to stated policies and procedures in the Admissions manual could jeopardize the College's accreditation and eligibility for Federal Title IV Student Financial Aid.

Resources:

- GEN-13-13
- 2023-24 COD Technical Reference (March 2023)
- GEN-22-06
- Federal Register, 12/11/20
- Electronic Announcement, 1/15/21 (OPE Announcements-21-05)
- 668.20
- 600.2, Recognized equivalent of a high school diploma; Regular student
- 2023-24 FSA Handbook, Vol. 1, Ch. 1, February 2023
- P.L. 114-113, Sec. 313
- 668.32
- 668.5
- 668.32(a)-(b)
- 668.32(d)
- 668.32(e)
- 668.32(e)(4)-(5)
- 668.32(f)
for federal student aid funds. Students must:

1. Demonstrate financial need as calculated using the Free Application for Federal Student Aid and institutions cost of attendance.

2. Have a high school diploma or recognized equivalent of a high school diploma. (See Admissions Policy)

3. Be enrolled in a degree-seeking or eligible certificate program.

4. Be a U.S. citizen or eligible non-citizen as established by completion of the Free Application for Federal Student Aid.

5. Make satisfactory academic progress as determined by the institution. Reference Section 13 of this manual.

6. Not be in default on a FSA loan or owe an overpayment on a FSA Grant or loan as established by completion of the Free Application for Federal Student Aid.

7. Have not completed a baccalaureate or professional degree.

3.3 Federal Financial Aid Programs in Which Institution Participates

Policies

The Program Participation Agreement between CMN and the Federal Department of Education entitles the institution to participate in the following federal programs:

1. Federal Pell Grant Program

2. Federal Supplemental Educational Opportunity Grant Program

3. Federal Work-Study Program.

Procedures

The Free Application for Federal Student Aid is received in the Office of Financial Aid and is used to establish eligibility for the programs in which the institution participates. The Financial Aid manager will review the ISIR to determine a student is eligible based upon the application-based requirements. Any additional requirements, including verification, is the responsibility of the Financial Aid Office.

Currently all of the academic programs offered by CMN meet the eligible program requirements. CMN opts to not award Title IV aid until a student is enrolled in classes and the term has started. This insures the student has begun attendance and is otherwise eligible.

3.3.1 Federal Work-Study Program

Resources:

- 675.8(c)-(f)
- 675.1(a)
The Federal College Work Study Program (FWS) provides employment for undergraduates who demonstrate financial need. These earnings assist students with educational expenses. The objective and purpose of the FWS program is to provide:

1. A source of financial aid to undergraduate students who demonstrate financial need.
2. Work experience which enhances the participants education whenever possible.

Procedures

Selection of students: The policy regarding dissemination of FWS funds is to award monies to students who apply for FWS. This is accomplished by awarding funds to needy (including part-time) students on a first come first serve basis until funds are exhausted. Reasonable effort is made to place students in positions which compliments and/or reinforces their educational and career goals. FWS funds are awarded to students who have requested a FWS application from the financial aid office. Students are selected/hired by appropriate department who is seeking a FWS employee.

Determination of award: Students are awarded FWS based on the allocation provided and divided among departments. Records, which document FWS eligibility and how financial need is met are maintained in the student file and on Empower, the student information system.

Employment during periods of non-enrollment: Students are allowed to work during periods of non-enrollment (i.e. vacations, breaks and summer session prior to June 30) provided sufficient work-study allocations exist. Typically FWS funds are not awarded for summer terms; however, the Financial Aid Manager may approve summer work study if funds are available. Students who work under the FWS during the summer and are now enrolled must sign an intent to enroll statement.

Overawards: Students are only awarded FWS funds if, in combination with other resources, the award does not exceed the student's need. If additional resources are received after FWS wages are paid, and the overaward is less than $300.00 no campus-based pay needs to be returned. There are no specific award limits for FWS earnings other than a student cannot earn more than their financial need. Students will have a Federal Work Study contract for the amount of hours they can work. There may be times when the contract can be modified to allow students to work more hours than first contracted. Students who earn their FWS award and want to continue working may do so if they have the employer's consent and are paid with non-FWS funds.

Distribution of FWS Funds: When CMN is notified of the final allocation of Federal Work Study funds, it is the responsibility of the Financial Aid Manager to take the following steps.

1. Calculate the amount of the administrative cost allowance to be taken from the FWS allocation. This is typically 5% of the allocation to the institution.
2. Once the available funds is calculated after subtracting the administrative cost allowance, the total number of hours available to award all employed students is determined based upon the institutional wage of $12.00/hr.
3. The Office of Financial Aid notifies the departments of the opportunity to hire student workers and opens up the process to request an approved position.
4. After the designation application period is determined, the financial aid office will determine how many hours can be allocated to each position requested.
5. During the first week of a semester students are invited to apply for open work study positions. CMN staff and faculty are encouraged to identify qualified students and provide them with application material. If a student applies and is selected by a department for a work study position, the financial aid offer is revised to include a work study award at that time.

3.3.1.1 General Employment Conditions & Limitations

Resources:
673.5(a)(2)
675.2(b), Community Services
Electronic Announcement,
1/15/21 (OPE Announcements-21-05)
2022-23 FSA Handbook, Vol. 6,
Ch. 2, July 2022
675.8(f)
675.9
675.10
675.19(b)(2)
675.20(b)(1)
Electronic Announcement,
3/5/20
2022-23 FSA Handbook, Vol. 3,
Ch. 6, July 2022
Policies

Students who are awarded and accept the FWS opportunity are provided the Student Work Study Handbook as a resource describing the terms and conditions of their employment. The employment relationship between the CMN and all FWS employees is exclusively that of an employee-at-will, meaning either the student or the College may terminate the relationship at anytime. Students will earn a rate of $12.00 per hour. The Financial Aid Office and the Business Manager establish the minimum rate of pay.

Procedures

Student employees are instructed to not earn more than the dollar amount awarded in their contract. It is the responsibility of the student employee and his/her supervisor to ensure the awarded contract amount is not exceeded. Student employees are restricted to working no more than 20 hours per week when classes are in session. Student employees are not allowed to work overtime hours. When classes are not in session permission from the FAO must be given to work more than their weekly hours indicated on their contract sheet.

The student is responsible for communicating with his/her supervisor regarding any changes in financial circumstances or receipt of additional financial aid or change in enrollment that could impact FWS eligibility.

3.3.1.2 Federal Share Limitations

Policies

At the discretion of the Financial Aid Office, 10% of FWS funds may be transferred to the FSEOG account. In addition, 10% of FWS funds may be carried forward or back to the next or last academic year’s work study account.

CMN as an American Indian Tribally controlled institution, is exempt from the matching requirement for FWS.

Procedures

Because CMN is a tribally controlled institution it is exempt from the matching requirement. Only federal funds are used to pay CMN students employed through Federal Work Study.

3.3.1.3 Fiscal Procedures & Recordkeeping

Policies

It is the responsibility of the student employee and supervisor to complete time sheets to record the student’s work hours. It is the responsibility of the Office of Financial Aid to receive and review the time sheets. It is the responsibility of the Payroll Office to process the pay for students employed through the FWS program.

Procedures

The Supervisory Work Study handbook describes the responsibilities of the supervisor, the Financial Aid Office and Payroll Office in administering the FWS program.

The Financial Aid Manager maintains a "Time Sheet Calculations" excel spreadsheet in the financial aid drive. This is used to enter the student’s name, hours worked and hours awarded. This used to monitor the earnings against the allocation awarded to the student.

3.3.1.4 Job Location and Development Program

Policies

CMN does not participate in the Job Location & Development Program.

Procedures

Resources:

675.20(a)-(c)
2022-23 FSA Handbook, Vol. 6, Ch. 2, July 2022

Resources:

Federal Register, 12/11/20
Electronic Announcement, 1/15/21 (OPE Announcements-21-05)
2022-23 FSA Handbook, Vol. 6, Ch. 2, July 2022

Resources:

P.L.-116-136
675.26
675.27
2022-23 FSA Handbook, Vol. 6, Ch. 1, July 2022
2022-23 FSA Handbook, Vol. 6, Ch. 2, July 2022
Electronic Announcement, 1/15/21 (OPE Announcements-21-05)
Electronic Announcement, 8/21/20
Electronic Announcement, 5/15/20

Resources:

668.16(i)
675.19
2022-23 FSA Handbook, Vol. 6, Ch. 1, July 2022

Resources:

675, Subpart B
675.19
675.32
3.3.2 Second Federal Program (e.g., Federal Pell Grant Program)

The Federal Pell Grant is a federally funded program with the purpose of helping financially needy students meet the cost of postsecondary education. This program is centrally administered by the federal government and is typically the foundation of a student's aid package.

**Policies**

**Determining Eligibility:** The Financial Aid Office uses the Pell award as the foundation of the student's financial aid package. Therefore, students requesting financial assistance during enrollment are required to establish Federal Pell Grant eligibility before additional determination of funds eligibility is made and/or awarded.

In order to determine eligibility for any federal financial aid program, students must file a Free Application for Federal Student Aid (FAFSA) and have the results sent to the College of Menominee Nation. The Financial Aid Office accepts results through electronic transmission with the Central Processing System (CPS). Student eligibility is determined only through the CPS of the Department of Education using the Federal Methodology needs analysis formula. The amount of Federal Pell Grant for which a student is eligible is determined using the Expected Family Contribution (EFC) and the corresponding cost of education from the Federal Pell Grant Eligibility Chart published by the Department of Education. The Financial Aid Office must have an official Expected Family Contribution (EFC) before eligibility for any fund may be determined.

Students are notified of the amount of their Pell Grant through an email award letter.

Students who are less than half-time may receive a Pell Grant.

All reports required by the Department of Education are submitted in a timely fashion.

The enrollment status of students is not determined until after the end of the add/drop period of the term. At that time, the actual amount of the Pell Grant is determined for each student. Disbursement occurs only when the enrollment matches the appropriate Pell award.

CMN defines enrollment as follows:

1. Full time is 12+ credit hours
2. Three-quarter time is 9 to 11 credit hours.
3. Half-time is 6 to 8 credit hours.
4. Part-time (less than half-time) is 1 to 5 credit hours.

Pell Grant awards are recalculated when there is a change in the EFC, when enrollment status changes between terms within the same award year, and when cost of attendance changes.

Students who have electronic Pell data submitted to CMN after the end of an enrollment period for which the student met all the necessary criteria will receive a retroactive (late) award, provided the student's file is complete prior to the last day of classes for the academic year.

Students who do not use their entire Pell allocation during fall and spring semesters may use the balance during the following summer period.

**Overawards:** In the event of an overaward, the student's account is placed on Hold until such time that the overpayment is rectified.

**Recordkeeping:** Financial aid records are maintained in student's folders as well as CMN's Empower student information system. The Financial Aid office is responsible for account management and appropriate record security for all student aid account transactions. The Student Records & Billing Coordinator ensures that all transactions are properly disbursed. The amount and date of awards are based on student eligibility.

**Procedures**
Payment: Students are notified of their Pell Grant eligibility through the award letter. By policy all grants and scholarships are packaged as "accepted". Pell Grant funds are disbursed to students based on CMN's disbursement schedule. Before disbursement, the Financial Aid Office checks the Empower Enrollment Problems Query to ensure the student remains eligible for the grant and is registered for the appropriate number of classes.

If a student is registered for a course in a later session, CMN must check the student's attendance in each course before the Pell Grant can be ordered for the later sessions. CMN will not order the portion of the Pell Grant associated with the later course sessions until the Financial Aid Office has proof of the student's attendance. Once attendance has been verified through the five-day add/drop process, that portion of the Pell Grant will be ordered and applied to the student's account. The Pell Grant is disbursed through CMN's Empower program. After subtracting tuition and other appropriate outstanding charges, Bursar's Office staff release the remaining proceeds to the student.

3.3.3 Third Federal Program (e.g., Iraq and Afghanistan Service Grant)

It is the responsibility of the Financial Aid Manager to determine if a student may qualify for the Iraq and Afghanistan Service Grant. It may not be readily apparent by the results of the FAFSA that a student is qualified.

Policies

It is the policy of the College Of Menominee Nation to award eligible students the Iraq and Afghanistan Service Grant. This is a non-need based grant program for students whose parent or guardian dies as a result of military service in Iraq or Afghanistan after September 11, 2001. CMN Iraq/Afghanistan Grant

Procedures

CMN requests that students who believe they are eligible for the grant contact the Office of Financial Aid. If a student receives the Federal Pell grant, he would not qualify to receive the IASG. The Financial Aid Manager will work with the student to establish eligibility and award accordingly. The amount of the IASG mirrors the Federal Pell grant program eligibility. However this grant is subject to sequestration. The reduction amount will be announced by ED annually.

3.3.4 Fourth Federal Program (e.g., Federal Supplemental Educational Opportunity Grant Program)

The Federal Supplemental Opportunity Grant (FSEOG) program is federally funded for the purpose of helping the financially needy students meet the cost of postsecondary education. This program is campus based program and is administered by the institution.

CMN as an American Indian Tribally controlled institution is exempt from the matching requirement for FSEOG.

Policies

It is the policy of CMN to first award FSEOG to Pell Grant eligible students. Priority is given to students with a lower Expected Family Contribution (EFC) while having a remaining financial need. Students are notified of the amount of their FSEOG award through the award letter. The Financial Aid Office has a SEOG process to ensure that the greatest number of students have an opportunity receive a portion of the institution's FSEOG allocation.

In the event of an overaward, the student's account is placed on hold until such time that the overpayment is rectified.

Financial Aid records are maintained in the Office of Financial Aid in student's folders as well as the Empower student information system. Student records include the demonstration of need and FSEOG eligibility.

Procedures

Determining Eligibility: In order to determine eligibility for any federal financial aid program, students must file a Free Application for Federal Student Aid (FAFSA) and have the results sent to CMN. The Financial Aid Office accepts results through electronic transmission with the Central...
Processing System (CPS). Student eligibility is determined using the official expected family contribution as determined by Federal Methodology and calculated by CPS.

**Disbursement:** FSEOG funds are disbursed to students who have an official EFC. By policy all grants and scholarships are packaged as "accepted". FSEOG funds are disbursed to students later in the semester near first session withdraw deadline. Before disbursement, the Financial Aid Office checks the Empower Enrollment Problems Query to ensure the student remains eligible for the grant and is registered for the appropriate number of classes. FSEOG is disbursed through Empower which subtracts tuition and other appropriate outstanding charges before releasing remaining proceeds to the student.

### 3.3.5 Fifth Federal Program (e.g., Teacher Education Assistance for College and Higher Education Grant Program)

CMN does not participate in this program.

**Policies**
NA

**Procedures**
NA

**Resources:**
668.21
668.165(a)
686.31(e)
685.203(k)
686.2(d)
Electronic Announcement, 5/19/22 (GENERAL-22-27)
686.20(b)
686.21(a)(1),(b)
686.22
686.23
686.22(b)-(g)
686.24
686.32
686.35
686.43(b)

### 3.3.6 Sixth Federal Program (e.g., Federal Direct Student Loan Program)

CMN does not participate in this program.

**Policies**
NA

**Procedures**
NA

**Resources:**
685.304(a)
685.102(b), Master promissory note
685.309
685.200(b)(5)
685.200(c)(2)
685.200
685.201(a),(b)
685.203(a)-(c), (f), (h)(j)
685.203(d), (e), (g), (l), (k)
685.301
685.301(c)
685.304(b)

### 3.3.7 Seventh Federal Program

### 3.4 State Aid Programs in Which Institution Participates

**Policies**
The College of Menominee Nation participates in the Wisconsin Higher Education Grant program (WHEG), the Wisconsin Indian Student Assistance Grant (WIG), the Wisconsin Minority Undergraduate Retention Grant (MRG), the Wisconsin Talent Incentive Program Grant and the Wisconsin Hearing and Visually Handicapped Student Grant.
Procedures

General eligibility for the State of Wisconsin Grant programs are:

1. The results of the FAFSA must be on file.
2. The student must be enrolled at least half-time in a degree or certificate program.
3. The student must be a citizen of the United State or an eligible non-citizen per federal student financial aid criteria.
4. Be a bonafide resident of Wisconsin as defined by Wisconsin Statute 36.27(2).
5. Meet satisfactory academic progress.
6. Have high school diploma or recognized equivalent.
7. Demonstrate financial need.
8. Must not be delinquent in child support.

State financial aid is based on a first come, first served basis. Student should apply early for state funding or be at risk of being put on a Wait Code. Generally eligibility is determined by the Wisconsin Higher Education Aids Board. Exceptions are noted in program descriptions. All reports required by the HEAB are submitted by the CMN Financial Aid Manager in a timely fashion.

Financial aid records are maintained in student's folders as well as CMN's Empower Program.

The Financial Aid Office is responsible for account management and appropriate record security for all student aid account transactions. The Student Records & Billing Coordinator ensures that all transactions are properly credited. The amount and date of any overpayment restored to the program account, the cost of attendance, determination of enrollment status, and enrollment period, eligibility of enrolled students who submit valid Pell records, name, Social Security number, amount paid, and amount and date of each payment are maintained in the Financial Aid Office.

3.4.1 First State Program (e.g., State Grant)

Wisconsin Higher Education Grant (WHEG) program provides grant assistance to undergraduate Wisconsin residents enrolled at least half-time in a degree or certificate program. Awards are based on financial need. Eligibility cannot exceed ten semesters.

Eligibility & Notification:

Student eligibility is determined through the Wisconsin Higher Education Acts Board (HEAB). The College of Menominee Nation is notified of the amount and eligible students through the HEAB notification list. Students are notified of the amount of the WHEG through the CMN award letter.

Students who are enrolled on a less-than-half-time basis are not eligible to receive WHEG. The enrollment status of students is not determined until after the end of the add/drop period of the term. At that time, the actual amount of WHEG is determined for each student. Disbursement occurs only when the enrollment matches the appropriate WHEG award.

WHEG awards are recalculated when there is a change in the Expected Family Contribution of when the enrollment status changes below six credits.

The amount of WHEG for which a student is eligible is determined using the Expected Family Contribution (EFC) and the WHEG Tribal formula approved by the HEAB Board.

In the event of an overaward, the student's account is placed on Hold until such time that the overpayment is rectified.

Payment:

WHEG funds are disbursed to students only after an official EFC has been received and verification procedures as required for Title IV aid is completed if required.

By policy all grants and scholarships are packaged as "accepted". WHEG funds are disbursed to students based on CMN's disbursement schedule. Before disbursement, the Financial Aid Office checks the Empower Enrollment Problems Query to ensure the student remains eligible for the grant and is registered for the appropriate number of classes.

WHEG is disbursed through the CMN's Empower program. After subtracting tuition and other appropriate outstanding charges, the Student Records & Billing Coordinator release the remaining
proceeds to the student.

3.4.2 Second State Program (e.g., State Work-Study)

Wisconsin Indian Student Assistance Grants (WIG) are awarded to Wisconsin residents who are at least 25% Native American and are undergraduate or graduate students enrolled in a degree or certificate program at the University of Wisconsin, Wisconsin Technical College, independent colleges and universities, Tribal Colleges or proprietary institutions based in Wisconsin.

Eligibility & Notification:

In addition to completing the FAFSA, students must complete the WIG application or fill out a BIA application through their Tribes' Education Office. Once the CMN Financial Aid Office receives one of the applications a Financial Aid Needs Analysis (FNA) is developed. The FNA is then sent to the State Education Office along with the application.

The Wisconsin Higher Education Aids Board determines eligibility. CMN is notified of the amount and eligible students through the HEAB notification list. Typically the amount awarded for each student is $1,100. Students are notified of the amount of their WIG Grant through an award letter.

Payment:

Students who are enrolled on a less than half-time basis are not eligible to receive WIG. The WIG funds are disbursed to students based on CMN's disbursement schedule. Before disbursement, the Financial Aid Office checks the Empower Enrollment Problems Query to ensure the student remains eligible for the grant and is registered for the appropriate number of classes.

WIG awards are recalculated when there is a change in enrollment status below six credits.

All grants and scholarships are packaged as "accepted". WIG is disbursed through CMN's Empower program. After subtracting tuition and other appropriate outstanding charges, Bursar's Office staff release the remaining proceeds to the student. In the event of an overaward, the student's account is placed on Hold until such time that the overpayment is rectified.

3.4.3 Third State Program (e.g. out-of-state program which can't be used at your school)

Wisconsin Minority Undergraduate Retention Grants (MRG) are made to Wisconsin resident minority undergraduates (excluding first-year students) enrolled at least half-time in independent, Tribal, or Wisconsin Technical Colleges. According to the statutes, a minority student is defined as a student who is either an African American, American Indian, Hispanic; or Southeast Asian from Laos, Cambodia or Vietnam admitted to the U.S. after December 31, 1975. Awards are based on financial need with a maximum grant of $2,500 per year for up to eight semesters or twelve quarters.

Eligibility and Notification:

The CMN Financial Aid Office follows its MRG grant procedure to select students. Criteria for selection is:

1. Not a first-year student.
2. Enrolled in six or more credits.
3. Minority status.
4. Financial Need
5. CMN bill
6. Attendance Status.

Students are notified of the amount of their MRG through an award letter.

The College of Menominee Nation is provided an allocation of MRG each award year through the HEAB secure site. Award amounts are determined after the Financial Aid Director reviews a list of eligible students and determines which students are eligible for MRG awards. HEAB minimum and maximum awards are $250 to $2,500.

Payments:

MRG funds are disbursed to students only after an official EFC has been received and verification as defined for Title IV aid is completed. All grants and scholarships are packaged as "accepted".

The enrollment status of students is not determined until after the end of the add/drop period and
last day to charge books. MRG is disbursed through CMN's Empower program. After subtracting tuition and other appropriate outstanding charges, the Bursar's Office staff release the remaining proceeds to the student.

**Additional State Grant Programs administered by CMN:**

**Wisconsin Talent Incentive Program Grants** are provided to the most financially needy and educationally disadvantaged Wisconsin resident students attending colleges and universities in the State of Wisconsin. First-time freshmen students are nominated for the TIP Grant by the school financial aid offices or by counselors of the Wisconsin Educational Opportunity Programs (WEOP). Student eligibility is determined through HEAB. To continue to receive the TIP grant students must be enrolled in consecutive terms and continue to show financial need. Eligibility cannot exceed ten semesters. Funding for the TIP Grant is provided by both the State of Wisconsin and the Federal Government.

**Eligibility and Notification:**

College of Menominee Nation is provided an allocation of TIP each award year through the HEAB secure site. Award amounts are determined after the financial aid director runs an eligible list of students and determines which students are eligible for TIP awards. HEAB minimum and maximum awards are $600 to $1,800 for initial awards, $250 minimum continuing award, maximum continuing award set annually by HEAB but may not exceed $1,800.

**Criteria for Selection:**

1. First-time freshmen
2. Meet financial need criteria set by HEAB
3. Meet non-traditional/educationally-disadvantaged criteria set by HEAB.
4. Financial need
5. CMN bill.
6. Attendance status

**Payments:**

TIP grants are disbursed to students only after an official EFC has been received and verification completed if required. All grants and scholarships are packaged as "accepted". The enrollment status is confirmed after the add/drop period and last day to charges books. Before disbursement, the financial aid office checks Empower Enrollment Problems Query to ensure the student remains eligible for the grant and is registered for the appropriate number of classes.

TIP is disbursed through CMN's Empower program after subtracting tuition and other appropriate outstanding charges, the Bursar's Office staff release the remaining proceeds to the student.

**Wisconsin Hearing and Visually Handicapped Student Grant:** established to provide funding to undergraduate Wisconsin residents enrolled at in-state or out-of-state public or independent institutions who show financial need and have a severe or profound hearing or visual impairment.

**Eligibility & Notification:**

Student eligibility is determined through the Higher Education Aids Board. Students must meet the eligibility requirements previously described. College of Menominee Nation is notified of amount and eligible students through the HEAB notification list. Students are eligible to receive up to $1,800 per year for up to ten semesters. Students who are enrolled at less than half-time basis are not eligible to receive Handicapped Grant.

**Payments:**

Handicapped grant funds are disbursed to students only after an official EFC has been received and verification completed if required. All grants and scholarships are packaged as "accepted". Grants are disbursed to students based on the CMN's disbursement schedule. Before disbursement, the Financial Aid office checks the Empower Enrollment Problems Query to ensure the student remains eligible for the grant and is registered for the appropriate number of classes.

Handicapped grants are disbursed through CMN's Empower program after subtracting tuition and
other appropriate outstanding charges, the Bursar's Office staff release the remaining proceeds to the student.

3.5 Institutional Aid Programs

Policies

College of Menominee Nation Scholarships are primarily designed to recognize and reward students who have consistently demonstrated high academic achievement through the awarding of monetary grants that do not require repayment. CMN must, when awarding scholarships and other financial aid, comply with various federal regulations that are designed to ensure fairness, equity, and responsiveness to individual students. These federal policies, in part, require the College coordinate aid from Title IV programs with the College's other Federal and non-federal student aid programs. This ensures the financial aid award presented to the student does not exceed their need. Additionally it is the goal of CMN to properly package and most effectively use the various types of student assistance (federal, state, institutional and private).

Procedures

All institutional scholarships are awarded by the Financial Aid Office to ensure:

1. Compliance with all federal regulations
2. Scholarship awards meet CMN criteria or criteria established by donors of private scholarship funds.
3. Aid is effectively distributed so as to maximize individual aid packages while not exceeding a student's calculated need.

There is a committee associated directly with administering and scoring CMN scholarships.

3.5.1 First Institutional Program (e.g., Dean's Scholarship)

Privately - Funded Scholarships are created from the donations made by individuals, families, corporations, foundations, alumni, faculty, staff and others to CMN. The awards and award criteria are established by the CMN Advancement Office with donor resources. Privately-funded Scholarship awards are based on professional standards, donor restrictions and endowment terms. Additionally directives of the President and/or Board of Trustees are a consideration.

Privately-Funded Scholarship Purposes:

1. Equitably distribute scholarship dollars to CMN students.
2. Provide applicants with insights and instruction on effectively communicating their abilities and interests through an essay and application process.
3. Introduce students to philanthropic giving through personal experiences with donors.
4. Provide stewardship for funds contributed to the College.
5. Sustain the College and advance its mission through thoughtful and purposeful recruitment and retention efforts.

The CMN Advancement Office periodically determines the amount available for distribution from Privately-Funded Scholarships. Determinations of award amounts is typically done in August and January for awards to be made for fall and spring semesters.

A Privately-Funded Scholarship Committee (PFS) exists to guide the award process and to assure equitable and timely distribution of PFS dollars. It is composed of CMN employees appointed by the Director of Advancement.

Two faculty members and one staff member serve as the Review Team with responsibility for reading and scoring scholarship essays. The Advancement Director provides student records including financial aid status, reviews applications and fund distribution. The Advancement Office representative provides funding analysis that represents donors' interests and assures donor acknowledgment.

3.5.2 Second Institutional Program (e.g., Alumni Loan Program)
College of Menominee Nation & Department Based Scholarships (Regent Presidential, ROTC, USDA, and CMN scholarships) are communicated through the College’s Financial Aid Office.

Eligible students are those individuals who have applied and been accepted to the CMN. Eligible students are required to submit a scholarship application form, other requested materials and meet the minimum scholastic and other requirements specified in published descriptions of the scholarship programs. Failure to comply with any one of these requirements is sufficient basis to not consider a student when decision are made to award scholarships.

The selection process must ensure that all potential eligible candidates, at the time the award of the scholarship is made, are considered, based upon documentation requested by the individual department. Upon the decision to award, documentation supporting the award decision must be submitted to the Financial Aid Office.

The responsibility for communicating to a prospective student that they are potentially eligible to receive the College Of Menominee Nation scholarship or restricted scholarship support rests with the Office of Financial Aid. There is no restriction on who may issue a congratulatory note or letter to students who have been awarded a scholarship.

3.6 Other Aid Programs

Policies
Not applicable

Procedures
Not applicable

3.6.1 First Other Program (e.g., Vocational Rehabilitation program)

Tribal Higher Education grants (BIA) are administered by each Tribal Education Office. The criteria for awards and application process are administered by each Tribal Education Office. Most require a Tribal Scholarship Application along with the completion of the FAFSA. Typically applicants are required to submit an academic plan, acceptance letter for new students, and updated grade reports for continuing students.

The CMN Financial Aid Office will complete a Financial Needs Analysis (FNA) and send it to the tribe upon receiving a copy of BIA applications. Verification procedures required for BIA Higher Education grants are identical to other Federal Title IV financial aid.

Eligibility criteria and award amounts will vary according to the policy of each tribe.

BIA funds are disbursed to students based on CMN’s disbursement schedule. Before disbursement the financial aid office checks the Empower Enrollment Problems Query to ensure the student remains eligible for the grant and is registered for the appropriate number of classes. The BIA Grant is disbursed through the CMN Empower program. After subtracting tuition and other appropriate outstanding charges the Bursar’s Office staff will release the remaining proceeds to the student. In the event of an overaward, the student’s account is placed on hold until such time that the overpayment is rectified.

3.6.2 Second Other Program (e.g., Health and Human Services health professions student aid program)

Veterans benefits are administered at CMN through the Office of Financial Aid. Veterans of active military service should contact their local Veterans Administration Service Office concerning the application process. Students requesting military benefits for the first time should complete, sign and submit the Certification Request for Educational Benefits - Veterans Information Worksheet and a copy of their DD214 or NOBE Letter which states eligibility of benefits.

3.X - Reserved for Institution Use
Section 4: Institutional Requirements Relating to Educational Loans

4.1 Private Education Loan Disclosures

Policies

The College of Menominee Nation does not participate in private education loans.

Resources:
601.2(b), Institution affiliated-organization and Private education loan
601.11(a-c)
Federal Register, 8/14/09, pp. 41194 to 41257
2022-23 FSA Handbook, Vol. 2, Ch. 5, August 2022
Federal Register, 10/28/09, p. 55628

4.2 Preferred Lender Arrangements

Resources:
601.2(b), Education loan and Preferred Lender arrangement
601.10(a)-(d)
601.21
668.14(b)(28)
601.12
601.20
Federal Register, 10/28/09, pp. 55628 to 55629

4.2.1 Preferred Lender Lists

Resources:
601.10(d)
668.14(b)(28)
2022-23 FSA Handbook, Vol. 2, Ch. 5, August 2022

4.2.2 Preferred Lender Arrangement Disclosures

Resources:
601.10(a)(1)
601.10(a)(2)
601.10(b)
601.10(c)
601.20
2022-23 FSA Handbook, Vol. 2, Ch. 5, August 2022

4.2.3 Preferred Lender Arrangement Annual Report

Resources:
601.20

4.2.4 Marketing of Private Education Loans

Resources:
601.2(b)
601.12
4.2.5 Preferred Lender Arrangement Code of Conduct

Resources:
601.2(b), Officer
601.21
668.14(b)(27)

4.3 Private Education Loan Applicant Self-Certification Form

Resources:
601.11(d)
668.14(b)(29)
GEN-13-15
Electronic Announcement, 1/10/20
2022-23 FSA Handbook, Vol. 2, Ch. 5, August 2022

4.4 Direct Loan Disclosures

Resources:
601.30

4.X - Reserved for Institution Use
Section 5: Student Consumer Information Requirements

5.1 Federal Student Consumer Information Requirements

The CMN Office of Financial Aid recognizes that in order to understand the complications of financial aid, accurate and timely dissemination of information to consumers is vital. Several policies have been implemented to ensure appropriate dissemination is achieved.

The primary method of disseminating consumer information to College of Menominee Nation students is through email or the institution's website: www.menominee.edu. In addition, email is designated as our official means of communication with all students.

Only information published, provided or referred by Financial Aid Office staff is to be considered valid. Any additional information should be verified with the staff from the Office of Financial Aid. Student retention and completion data is gathered by the Institutional Research Office.

5.1.1 Notice to Enrolled Students

Policies

Consumer information is provided to prospective and current students and employees at the CMN Website: https://www.menominee.edu/about-cmn/accreditation/federal-consumer-information

Procedures

Prospective students at CMN are notified of the availability of the required consumer disclosures by the Office of Admissions. This is done by email. Enrolled students at CMN receive an email including the consumer information and FERPA information from the Registrar's Office.

5.1.2 Financial Aid Information

Policies

The Office of Financial Aid is responsible for notifying prospective and enrolled students of the types of financial aid available. Financial Aid funds may be categorized as the following basic sources: federal, state, tribal and institutional and other.

Procedures

Procedures for applying for financial aid are located on the College of Menominee Nations website (www.menominee.edu/financial_aid.aspx?id=1599) Financial Aid website (https://studentaid.ed.gov.sa.fafsa). In addition, notices announcing deadlines and application available are distributed through email. In those cases where additional documents may be requested to complete processing of the aid request. Notifications of additional required documents are sent to students through a missing-document email and are displayed on the students' My Empower.
5.1.3 Institutional Information

**Policies**
The CMN website is primary location for notification regarding the following:

1. Accreditation and licensure.
2. Academic programs and instructional personnel.
3. Services for students with disabilities.
4. The institution’s refund policy.
5. The institution’s Return to Title IV policy.
6. The descriptions of fees for attendance. Additionally the Office of Financial Aid also provides of cost to attend information.

**Procedures**
The student achievement specialist provides information and assistance to students with disabilities who might require accommodations.

5.1.4 Completion or Graduation Rate

**Policies**
Student retention and completion data is published on the CMN website.

**Procedures**
The Institutional Research Office is responsible for gathering and publishing student retention and completion data.

5.1.5 Annual Security Report

**Policies**
CMN Campus Administrators are responsible for preparing and distributing the annual campus security report. It is published on the CMN Consumer Information Page.

**Procedures**
Notice is sent annually to students and employees of the publication of the campus security report by the President's Office. See section 5.1.1.

5.1.5.1 Timely Warnings and Emergency Notifications

**Policies**
CMN is required to make timely warnings to the campus community regarding certain crimes reported to campus security authorities or local police that are considered threats to students and employees.
It is the responsibility of the President's office in consultation with campus and local police to determine when these warnings are warranted.

**Procedures**

Notification is provided as described in the Emergency Procedures document provided on the CMN Website:

https://resources.finalsite.net/images/v1647982538/amenominee.edu/gqnd7bpfxblbnpajxn7s/EmergencyProcedures.pdf

5.1.5.2 Campus Crime Log

**Policies**

The President's Office is responsible for making the campus crime report available annually. It is published on the CMN website.

**Procedures**

The campus crime report is made available on the Consumer Information page of the CMN website:

https://www.menominee.edu/about-cmn/accreditation/federal-consumer-information/campus-security

5.1.6 Student-Athlete Completion or Graduation Rate

**Policies**

CMN does not provide athletically related aid.

**Procedures**

NA

5.1.7 Athletic Program Participation and Financial Support Report

**Policies**

Not applicable

**Procedures**

Not applicable

5.1.8 Annual Fire Safety Report

**Policies**

Not applicable, no on campus housing.

**Procedures**

Not applicable

5.1.8.1 Fire Log

**Policies**

Not applicable

**Procedures**

Not applicable

5.1.9 Other General Disclosures

**Policies**

CMN provides disclosures regarding retention and graduation, employment of graduates and vaccination policies on the Consumer Information page on the CMN website.

Resources:

668.46(g)
The Clery Act Appendix for FSA Handbook 2022-23 FSA Handbook, Vol. 2, Ch. 6, August 2022

668.46(f)
The Clery Act Appendix for FSA Handbook 2022-23 FSA Handbook, Vol. 2, Ch. 6, August 2022

668.41(f)
668.48
668.44
668.45(a)-(e)
2022-23 FSA Handbook, Vol. 2, Ch. 6, August 2022

668.41(b)
668.41(c)(2)
The Clery Act Appendix for FSA Handbook 668.49(a)-(c)
668.41(e)
668.41(a), On-campus student housing facility

668.49(d)
The Clery Act Appendix for FSA Handbook

20 U.S.C. 1092(a)(1)(V)
668.14(b)(10)
5.1.10 Drug and Alcohol Abuse Prevention Information

Policies
CMN provides information regarding drug and alcohol abuse prevention on the CMN website in the Student Rights and Responsibilities notice. This is the responsibility of the President’s office and senior student affairs administrators.

Procedures
See Section 5.1.1.

5.1.11 Voter Registration Information

Policies
CMN provides information regarding voter registration on the Consumer Disclosure Page of the CMN website.

Procedures
CMN President’s Office in consultation with student affairs staff are responsible for providing the voter registration material. See Section 5.1.1.

5.1.12 Peer-to-Peer File Sharing

Policies
CMN provides information on the Consumer Information page on the CMN website regarding peer-to-peer file sharing, illegal downloading or unauthorized distribution of copyrighted materials using the institution’s information technology system.

Procedures
CMN Administrators in Information Technology are responsible for compiling and updating this information.

5.1.13 Arrangements with Financial Account Providers, Including Tier One (T1) and Tier Two (T2) Arrangements

Policies
CMN does not have an arrangement with a financial account provider to process Title IV credit balances or to offer, market or provide accounts to which Title IV credit balances can be disbursed.

Procedures
Not Applicable
5.2 State-Required Consumer Information

Not Applicable

5.3 Accrediting Agency Consumer Information

CMN is accredited by the Higher Learning Commission. Required consumer disclosures are consistent with that of the Higher Education Act.

5.4 Title IV Loan Counseling

5.4.1 Entrance Counseling

Policies
CMN does not participate in Title IV Federal student loans.

Procedures
Not applicable

Resources:
685.304(a)
674.42(b)
682.604(a)
GEN-15-06
685.304(b)

5.4.2 Exit Counseling

Policies
Not applicable

Procedures
Not applicable

Resources:
685.304(a)

5.5 Teacher Education Assistance for College and Higher Education (TEACH) Grant Counseling

5.5.1 Initial Counseling

Policies
CMN does not participate in the TEACH Grant program.

Procedures
Not Applicable

Resources:
686.32

5.5.2 Subsequent Counseling

Policies
Not applicable.

Procedures
Not applicable

Resources:
686.32(a)(3)
686.32(d)
5.5.3 Exit Counseling

**Policies**

Not applicable.

**Procedures**

Not applicable

5.X - Reserved for Institution Use
Section 6: Applications and Forms

6.1 Application Process

**Policies**

CMN requires students seeking student aid to submit the Free Application for Federal Student Aid annually. Students who submit their FAFSA early are more likely to have access to all grants available to them. The FAFSA typically becomes available October 1 for the following academic year. Interested students are encouraged to complete the FAFSA as soon as they can after the FAFSA becomes available. The CMN Financial Aid web site will be updated annually to provide information on the application process for students.

**Resources:**

- 668.16(f)
- 2023-24 FSA Handbook, Vol. AVG, Ch. 1, December 2022
- The ISIR Guide, 2023-24
- Summary of Changes for the Application Processing System, 2023-24
- 2023-24 FSA Handbook, Vol. AVG, Ch. 5, December 2022

**Procedures**

The submission of the FAFSA to CMN informs the Office of Financial Aid that the student wishes to apply for financial aid. Missing document emails are sent to students who are required to submit additional documents to complete processing of the aid request. This can happen when the student's FAFSA is selected by the Federal Student Aid Central Processing system for verification. Once the file is completed it is forwarded to the Financial Aid Manager for review. If the manager requires additional information, an email or phone call will be made to the student.

Students are notified that financial aid funds are awarded on the basis of eligibility and time of submission of the application. Students are informed that missing information will result in a delay of the processing of their financial aid application. Students need to be aware that it is better to complete the FAFSA and/or verification documents are soon as possible.

Documentation submitted to the Financial Aid Office must be legible, appropriate and have the student's Social Security number for identification purposes. If the student submits a document which is not legible (i.e. a copy of a tax return in which the income numbers are not identifiable), appropriate (a tax return is requested and the student submits a W-2), or identifiable (student submits a copy of the step-parent's tax return and the last name does not match the student's and there is no student Social Security number) the documents will be returned and additional documentation is requested. The return of documentation is recorded on the computer system.

6.2 Forms

**Policies**

CMN does not require anything other than the Free Application for Federal Student Aid. CMN does provide a financial aid checklist document annually to assist students with the application process. It is the responsibility of the Financial Aid Manager to evaluate and update forms required for verification annually and to insure the proper forms are accessible to applicants on the CMN web site.

**Procedures**

CMN provides access to verification documents electronically on its web site in the Financial Aid Form Library:

CMN Financial Aid Form Library

Additionally when an ISIR is received by an applicant, the Financial Aid Manager will notify the applicant via email if verification is required. That email will include the required verification documents. See Section 7, File Review and Verification. When the ISIR is received for a student selected for verification, the Empower system will automatically track for the correct verification documents. Therefore in addition to the notification sent by the Financial Aid Manager, applicants
have access to the forms on their My Empower student portal.

6.3 Deadlines

Policies

Students are notified that the majority of financial aid funds are awarded on a first-come, first-served basis and that until the missing items are submitted to the Financial Aid Office, additional processing of their file is not possible. Students who failed to submit verification documents never become complete; there, aid is not awarded for these students.

Procedures

Students who submit verification documents very late after the time they were requested will be awarded aid on an availability basis. Typically, by the end of summer semester funds are depleted. CMN does not establish verification deadlines beyond those established by ED. See section 7, File Review & Verification.

6.4 Document Assignment, Collection, and Tracking

Policies

The application for Federal Financial Aid (FAFSA) is received in the CMN Office of Financial Aid via the Electronic Data Exchange System and loaded into the CMN Empower system. Those students selected for verification are identified when the ISIR is loaded. Documents required are tracked on the Empower system and students are notified via email.

Procedures

The verification email requests the appropriate verification documents (i.e. verification form, student and parent tax returns). Students are notified that financial aid funds are awarded on eligibility and time of submission of application; students need to be aware that it is better to complete FAFSA applications and verification as soon as possible.

When documents arrive, they are reviewed by the Financial Aid Manager for completeness and proper signatures.

The financial aid manager will complete the verification process. If additional forms are required, the student will be notified by the Financial Aid Manager by email and the request will be tracked in the Empower system. See Section 7, File Review & Verification.

6.5 Pre-Packaging Appeals

Policies

CMN typically awards students after the start of the semester to confirm enrollment. Therefore prepackaging appeals will be considered. These are initiated by student or parent request.

Procedures

Cross Reference: Section 10 Professional Judgment

The Financial Aid Manager will work directly with the student and family regarding any prepackaging appeals. The student will be instructed to complete the Unusual Circumstance Form. Financial Aid Form Library

The Financial Aid Manager will review the submitted unusual circumstance form and determine if a professional judgment adjustment is appropriate. This will be tracked in the Empower system and any prepackaging adjustments will be noted.

CMN encourages students who may be otherwise dependent to contact the Financial Aid Office if they feel their circumstances warrant a dependency override. The student will be encouraged to complete the dependency override request available on the CMN web site: Financial Aid Form Library

Resources:
668.53(a)(1)
668.60
668.164(i)-(k)
Federal Register, 6/1/22, pp. 33135 to 33139
2023-24 FSA Handbook, Vol. AVG, Ch. 1, December 2022
2023-24 FAFSA

Resources:
GEN-16-15
GEN-16-12
GEN-15-01
GEN-15-18
Electronic Announcement, 2/16/23 (GENERAL-23-10)

Resources:
HEA 479A
GEN-22-15
2023-24 FSA Handbook, Vol. AVG, Ch. 5, December 2022
GEN-11-15
GEN-21-02
GEN-15-04
GEN-17-08
GEN-08-12
GEN-08-01
GEN-03-07
Section 7: File Review and Verification

7 - File Review - Intro

File review for verification, database matches, reject or C-Codes and other comment codes, edits, or flags which impact a student's eligibility for Title IV aid is the responsibility of the Financial Aid Manager.

7.1 Verification

7.1.1 Selection of Applicants to be Verified

Policies

The Financial Aid Office at CMN verifies those applications identified by the U.S. Department of Education. Aid administrators may select a student for verification if there is a discrepancy or condition which is unusual and warrants investigation. Additionally if CMN has conflicting information concerning a student's eligibility or has any reason to believe a student's application information is incorrect, the conflict must be resolved before disbursing financial aid funds. This is the responsibility of the Financial Aid Manager.

Resources:

- 668.53
- 668.54
- 668.54(a)
- Federal Register, 7/8/22, pp. 40826 to 40830
- GEN-22-09
- 668.54(b)
- 2023-24 FSA Handbook, Vol. AVG, Ch. 4, December 2022
- GEN-17-08
- 668.60(a)
- 668.60(c)(1)
- 668.60(b)(2)
- Federal Register, 7/5/22, p. 39809
- Federal Register, 9/29/17, pp. 45465 to 45471
- Electronic Announcement, 9/13/17
- Program Integrity Q&A, Verification - Introductory Verification Questions

Procedures

The CMN Financial Aid Manager typically loads Institutional Student Informational Records (ISIRS) on Monday or Tuesday of each week. ISIRS are extracted out of Ed Connect and a four-step process is run using File Zilla to load the records into the Empower System. (See Section 7X - for institutional use for description of these steps).

Within Empower once the ISIR is loaded, the verification tracking code is noted and through system table set-up the proper verification documents are tracked.

The Financial Aid Manager would individually email those students selected for verification and provide the necessary forms to complete verification. He will also inform the student that the required items are tracked on the student's "My Empower" portal. A note is made within the student's file in Empower that this verification notice was emailed.

When required verification documents are submitted by the student, the Financial Aid Manager will place it in an individual folder for that student and he will check the file manually each week until all verification items have been received. Typically on Tuesdays of each week this manual process of reviewing verification files and completing verification for those students who have submitted all documents is done.

7.1.2 Acceptable Documentation and Forms

Policies

CMN requires students selected for verification to submit the documents prescribed in the Federal Student Handbook verification guide.

In cases where IRS data retrieval has been successfully used to complete the FAFSA the following data elements have been accurately provided:

- Type of return filed
- Adjusted gross income
- Taxes paid
- Education credits
- IRA deductions
- Tax-exempt interest income
- Untaxed portions of IRA distributions

Resources:

- 668.56
- 668.53(a)
- 668.53(b)
- Electronic Announcement, 7/9/20
- Federal Register, 7/8/22, pp. 40826 to 40830
- 668.57
- GEN-22-09
- 2023-24 FSA Handbook, Vol. AVG, Ch. 4, December 2022
- Electronic Announcement,
 Untaxed portions of pensions
Income earned from work
Tax return filing status

In cases IRS data retrieval has not been used, CMN will request a copy of the 2021 Federal Tax Return or Tax Return Transcript to verify tax-related items. Non-tax related items are requested on the institution verification document.
CMN V1 Dependent Verification Form
CMN Independent V1 Verification Form

In cases where the student is selected for verification with the V4 tracking code, students must complete confirmation of identity/statement of education purpose.
CMN V4 Dependent Student Verification
CMN_V4_Independent_Student_Verification

In cases where the student is selected for verification with the V5 tracking code, students must complete confirmation of identity/statement of education purpose and all items required in the V1 tracking group.
CMN_V5_Dep_Aggregated_Verification_Form
CMN_V5_Independent_Verification

As part of the standard verification process, CMN does send to all selected students for V1 or V5 verification, a low income form which is required to be returned only in cases where the applicant indicates she has not filed a Federal Tax return.
CMN_Low_Income_verification_form

All forms are located here: Financial Aid Form Library

Procedures

Students are notified that they are selected for verification on the Student Aid Report. In addition, the verification email sent by CMN notifies the student what is required and the missing documents are listed on My Empower.

Documents received in the Office of Financial Aid are reviewed to insure they are legible, appropriate and have the student's Social Security number for identification purposes. If the student submits a document which is not legible (i.e. a copy of a tax return in which the income numbers are not identifiable), appropriate (a tax return is requested and the student submits a W-2) or identifiable (student submits a copy of a step-parents tax return and the last name does not match the student's and there is no student Social Security number) the documents will be returned and a request for additional documents will be made. This is tracked in the Empower system.

7.1.3 Data Elements to be Verified

Policies

Verification is the process of confirming the accuracy of student reported data on financial aid applications. The Department of Education issues required verification items annually in the Federal Register. The Office of Financial Aid at CMN may select a student for verification if there is a discrepancy or a condition which is unusual and warrants investigation. It is the policy of CMN to verify a student's application before awarding and/or disbursing financial aid.

Resources:

GEN-01-06
2022-23 FSA Handbook, Vol. 2, Ch. 7, August 2022
Program Integrity Q&A, Verification, DOC-Q12/DOC-A12
2022-23 FSA Handbook, Vol. 2, Ch. 7, August 2022
Procedures

Data elements that are required for verification include the following:

- Adjusted Gross Income is verified by comparing the student, spouse or parent income tax return transcript to federal data.

- U.S. Income Tax Paid is verified by comparing the student, spouse, or parent income tax return transcript to federal data.

- Household Size is verified by comparing the Verification Worksheet (completed by the applicant) to federal data. Regulations do allow situations when verification of household size is not required. The CMN Office of Financial Aid does not have a systematic way to track these exclusions. Therefore, all students selected for verification must submit a response to the household-size question on the verification worksheet.

- Number of Family Members in Post-secondary Institutions: the number of family members enrolled at least half-time in post-secondary institutions is verified by comparing the Verification Worksheet to federal data. The CMN Office of Financial Aid does not have a systematic way to track these exclusions. Therefore, all students selected for verification must submit a response to the household-size question on the verification worksheet.

- Untaxed income and benefits are verified by comparing a copy of the student, spouse or parent income tax return transcripts and/or W2's to federal data. All discrepancies must be corrected before further processing.

- Identity/Statement of Educational Purpose is verified by comparing original government-issued ID and signed statement of educational purpose or a notarized copy of that ID and statement to the federal data.

The Financial Aid Manager will complete Verification Checklist for each student selected to confirm or correct the required items. The verification checklist once completed is retained in the student's financial aid file. If verification process results in changes to the ISIR, the Financial Aid Manager will manually enter those corrections into FAA Access. The corrections are also noted in Empower. The student is notified via email by the Financial Aid Manager that corrections have been made to ISIR and what those corrections are.

7.1.4 Conflicting and Inaccurate Information

Policies

The Financial Aid Office at CMN verifies all applicants selected by the Department of Education. However aid administrators may select a student for verification. This can occur if there is a discrepancy or a condition which is unusual which warrants investigation. Any corrections are made in FAA Access and the student is notified via email.

There are three situations whereby the Financial Aid Office may update student information. When students notify the aid office of an allowable update, the Financial Aid Office may submit new information via FAA Access to the student's FAFSA. A new expected family contribution may be calculated that can be used to award financial aid. These updates are:

1. Dependency status, except through marriage.
2. Family size
3. Number of family members enrolled in a postsecondary institution.

Procedures

The Financial Aid Manager will determine if additional documentation is necessary to resolve conflicting information and will notify the student of required documentation via email. Required documents are tracked in Empower. Once the required documents are received the Financial Aid Manager will review the documentation and compare it to the answers submitted on the FAFSA by the applicant.

7.1.5 Student Notification of Verification Changes

Resources:

668.16(f)
2023-24 FSA Handbook, Vol. AVG, Ch. 5, December 2022
668.16(g)(1)
2022-23 FSA Handbook, Vol. 2, Ch. 3, August 2022
668.54(a)(2)
GEN-11-17
Electronic Announcement, 8/7/17
Electronic Announcement, 8/21/20

Resources:

668.53(a)(5)
Students are notified of the results of verification in an email.

Once required verification information is submitted to the Office of Financial Aid, the Financial Aid manager will compare the information submitted to the answers provided on the FAFSA. If there are discrepancies, the Financial Aid Office will make the corrections through FAA Access to CPS. An email will be sent to the student notifying him/her of changes.

### 7.1.6 Interim Disbursements

**Policies**

Because the Financial Aid Office is liable for disbursements made prior to the completion of verification, interim disbursements are not made at CMN.

**Procedures**

Not applicable.

### 7.2 Clearance of Database Matches, Reject Codes, C-Codes, Comment Codes, and Other Edits

**Policies**

ISIR's that are received in CMN indicating a "C" code are identified, tracked and monitored in a manner similar to the verification process. See section 7.1. These issues are identified in the ISIR loading process and are tracked in Empower automatically. The Financial Aid Manager will notify the student of the "C" code that has been tracked and request via this individual email what document is required to resolve it. This date of notification is noted manually by the Financial Aid Manager in Empower.

**Procedures**

Once an applicant is determined to have a "C" code on the ISIR, the financial aid manager determines the appropriate document request and notifies the student via email of what is required. Once the document is received it is reviewed by the Financial Aid Manager to determine if the "C" code can be resolved or if further action is required. In cases where the "C" code can be resolved with the documents provided, the Financial Aid Manager will enter corrected information on FAA Access to update the ISIR. The Financial Aid Manager will make note of this in the Empower System and will send an email to the student notifying him of the correction and reprocessing of the
FAFSA.

7.2.1 Social Security Administration (SSA)

Policies
It is the responsibility of the Financial Aid Manager to identify those students with a Social Security Administration "C" Code. This will typically occur because of a data entry error when the FAFSA is completed.

Procedures
The SAR C Code/Reject table is used.

7.2.2 Department of Homeland Security (DHS)

Policies
Department of Homeland Security "C" codes are the result of the applicants information as submitted on the FAFSA not matching the Homeland Security data base. In order for a student to be eligible for Title IV aid, she must be a U.S. citizen or national or a citizen of the Freely Associated States or a permanent resident or otherwise eligible non-citizen. This flag will be generated when the student's identifying information on the FAFSA does not match the records of the Department of Homeland Security.

Procedures
The SAR C Code/Reject table is used.

7.2.3 [Reserved]

Policies
As part of the Consolidated Appropriations Act 2021, the Selective Service criteria has been removed from student eligibility requirements for Title IV aid. CMN no longer requires selective service registration verification.

Procedures
Not Applicable

7.2.4 National Student Loan Data System (NSLDS)

Policies
It is the responsibility of the Financial Aid Manager at CMN to notify a student if the ISIR record is returned with a "C" Code indicating a default on a Federal student loan or an overpayment on a Federal Grant. The student is ineligible for Title IV aid until this "C" code is resolved.

Procedures
The SAR C Code/Reject table is used.

7.2.5 Department of Justice (DOJ)

Policies
Though not a database match, the CPS checks the DOJ's hold file to determine if an applicant's eligibility for Federal benefits, including Title IV funds, has been suspended or terminated by the court due to a drug offense conviction under section 5301 of the Anti-Drug Abuse Act of 1988. The DOJ's hold file is not related to the FAFSA drug conviction question, which asks the student if they have a drug conviction. The student's ISIR and SAR will contain c-code 009 with a comment instruction the student to contact ED within 30 days by calling
for guidance on resolving the issue.

**Procedures**

The Financial Aid manager will note if the ISIR is received with comment code 009, stating that this FAFSA cannot be processed because of issues related to the Anti-Drug Abuse Act of 1988, then the Department of Justice has placed a "hold on the student." The Financial Aid manager will contact the student via email. A hold will be placed on the student's file so no packaging will occur until this is resolved. The student is notified on the SAR to call ED within 30 days at (202)377-3889 for guidance on resolving the issue.

7.2.6 Department of Defense (DOD)

**Policies**

It is the responsibility of the CMN Financial Aid Manager to notify applicants who have indicated veteran status on the FAFSA that this status was not confirmed in a Department of Defense database match. The requested documents will be tracked in the Empower system. The student is ineligible until this is resolved.

**Procedures**

The Sar C Cod/Reject form is used.

7.2.7 [Reserved]

**Policies**

As part of the Consolidated Appropriations Act, 2021, the drug conviction criteria was removed from student eligibility requirements for Title IV aid. Although associated comment codes and messaging may appear on the ISIR, schools are instructed to ignore these comment codes.

**Procedures**

Not applicable,

7.2.8 Unusual Enrollment History (UEH)

**Policies**

A student whose ISIR is flagged for Unusual Enrollment History will have a hold placed on the application. It is the responsibility of the Financial Aid Manager to verify that the applicant is eligible for aid. No award will be made until this is resolved.

**Procedures**

The SAR C Code/Reject form is used.

7.3 Review of Subsequent ISIR Transactions and Postscreening

**Policies**

CMN will review all subsequent ISIRs each week as part of the institution's regular ISIR loading process. It is the responsibility of the FA manager to review subsequent ISIRs to determine if additional action is required. The exception would be in a case where the student is no longer enrolled at CMN.

**Procedures**

The FA manager will identify the subsequent ISIR during the regular Empower loading process. The first step taken is to confirm if the student's EFC has changed or if a "C" Code has been resolved or changed. The FA
Manager will also review comments on the ISIR to determine if any other eligibility flags have been changed, including NSLDS. If there are no changes impacting the student's eligibility or current financial aid award, no further action is required.
If the ISIR comments indicate the student's award is impacted or the student is potentially no longer eligible, the FA Manager will contact the student via email. In cases where the additional documents are required to verify information on the ISIR or resolve a "C" Code, steps as described in Section 7.2 will be taken. In cases where the subsequent ISIR includes changes made by the student or another institution, the FA Manager will compare those changes to the original and/or verified ISIR originally received by CMN. If the subsequent ISIR is incorrect, it will not be loaded and the FA Manager will document the student's file confirming that the ISIR was reviewed and suspended (not loaded). If in error a subsequent ISIR that is incorrect is loaded, the FA Manager will manually correct the ISIR and submit back to the CPS for processing, then load the subsequent ISIR in the next ISIR loading process.

7.3.1 Defaults
**Policies**
If a subsequent ISIR indicates the student is now in default, a "H" Hold is placed on the student's record in Empower. The Financial Aid Manager is responsible for contacting the student either in person, if the student is currently enrolled or via email if this occurs prior to the start of the academic year.

**Procedures**
See section 7.2.4. If Federal Aid had already been disbursed to the student account the FA Manager will notify the student and take any action as required to correct the student's award. This may include the reversal of a disbursement.

7.3.2 Overpayments
**Policies**
If a subsequent ISIR indicates the student now owes an overpayment on a Federal Grant, a "H" hold is placed on the student's record in Empower. The Financial Aid Manager is responsible for contacting the student prior to the start of the academic year.

**Procedures**
See section 7.2.4 If Federal Aid has been disbursed to the student account the FA Manager will notify the student and take any action as required to correct the student's award. This may include the reversal of a disbursement.

7.3.3 Change in Disability Status
**Policies**
CMN does not participate in the Federal Direct Loan program, therefore a change in a student's disability status would not be relevant.

**Procedures**
Not Applicable.

7.3.4 Postscreening Process
Policies
CMN reviews subsequent ISIRS transactions for NSLDS information that impacts the applicants eligibility for aid. This is the responsibility of the FA Manager.

Procedures
Because CMN does not participate in the Federal Direct Loan program, a student's financial aid award is not specifically impacted by any change in borrowing history. However if the postscreening process indicates there is a default or an overpayment from prior enrollment, the process described in 7.3.1 and 7.3.2 will be followed.

7.4 Additional Institution-Specific Data Elements

Policies
CMN does not have any additional institution-specific data elements to make financial aid awards. If a student is seeking institutional scholarships or State of Wisconsin aid, additional applications may be collected. See Section 3, Federal Student Aid programs,

7.X - Reserved for Institution Use

This link provides instructions on CMN's Empower system and the verification process
Section 8: Student Budgets

8.1 Various Student Populations

**Policies**

Student budgets at CMN are an important component in the financial aid process. Standard student budgets reflecting the average student cost of attendance are used to award financial aid. Special budget considerations are approved by the Financial Aid Office on a case-by-case basis.

**Procedures**

Budgets are assigned on the basis of the student’s enrollment. The procedures outlined in this link describe the process of budget assignment in the Empower system: https://www.menominee.edu/admission-aid/financial-aid

8.2 How Budgets are Derived and Updated

**Policies**

The Financial Aid Office annually collects information to prepare standard costs.

1. Tuition & Fees are approved by the CMN Board of Directors.
2. Books, course materials, supplies and equipment allowance are estimated by the College of Menominee Nation.
   1. This category can include a reasonable allowance for a personal computer up to 900 dollars. To add the personal computer allowance a student will need to fill out the cost of attendance adjustment form (more information on form is located in section 8.3 or 8.6).
3. Living expenses are established by averaging area rental and food prices.
4. Transportation costs are estimated for students.
5. Miscellaneous personal expenses are estimated for costs of clothing, toiletries, medical/dental, recreational and other miscellaneous expenses.
6. Dependent care costs are estimated. (A student will need to request dependent care costs, by filling out the cost of attendance adjustment form located in section 8.3 or 8.6)
7. License, Certification, or First Professional Credential Allowance is based on the student’s selected program.
   1. Programs with this allowance are Elementary/Middle School Education (BS) and Substance Abuse Counselor (Associate)

**Procedures**

The Office of Financial Aid at CMN will be informed of tuition and fees by the institution’s Board of Governors typically in the spring semester for the upcoming academic year. Indirect costs for room, board, books, transportation and personal expenses are derived by reviewing information published by the Federal government and the State of Wisconsin.

- Federal Consumer Price Index: Consumer Price Index
- The Wisconsin Department of Energy, Housing and Community Resources: Wisconsin Dept. of Home, Energy and Community Resources

Cost of attendance as developed by the Financial Aid Manager, is reviewed and approved annually by the CMN Dean of Student Success and Chief Academic Officer.

An Additional $805 may be added to personal for dependent children under 12, up to 3 maximum. The
Financial Aid office will need a student requesting this additional funds to fill out the cost of attendance adjustment form (more information on form is located in section 8.3 or 8.6). However if the students actual cost are lower than the $805 the actual costs must be used.

8.3 Additional Costs

<table>
<thead>
<tr>
<th>Resources:</th>
</tr>
</thead>
<tbody>
<tr>
<td>2023-24 FSA Handbook, Vol. AVG, Ch. 5, December 2022</td>
</tr>
<tr>
<td>2022-23 FSA Handbook, Vol. 3, Ch. 2, July 2022</td>
</tr>
<tr>
<td>2023-24 FSA Handbook, Vol. 4, Ch. 2, March 2023</td>
</tr>
</tbody>
</table>

**Policies**

CMN will on a case-by-case basis include other costs in a student's budget upon the request of the student.

**Procedures**

Requests for budget increases due to additional costs such as those associated with disabilities or dependent care require documentation from the student. The Financial Aid Manager will have the student fill out the cost of attendance adjustment form found here: [https://resources.finalsites.net/images/v1638830112/menominee.edu/plqngfyqaybohf9msakf/CostofAttendanceAdjustment20-21.pdf](https://resources.finalsites.net/images/v1638830112/menominee.edu/plqngfyqaybohf9msakf/CostofAttendanceAdjustment20-21.pdf)

If approved The budget will be increased to include the additional cost as noted in the Empower system. Documentation will be retained in the student's financial aid file.

8.4 Budget Restrictions

**Policies**

CMN does not provide correspondence classes. CMN does not provide educational programs to incarcerated students. Students who enroll at less than half-time status may be eligible for Federal Pell Grant funds.

**Procedures**

Less than half-time students may be eligible for Federal Pell Grants. CMN does develop a specific cost of attendance for less than half-time students that by institutional policy will exclude room and board. COA is derived by the process described in Section 8.2, but is prorated based upon enrollment at less than half-time. It will include tuition and fees, books, course materials, supplies, transportation, professional licensure, and dependent care if applicable (Cost of Attendance form filled out an approved, form found in sections 8.3 or 8.6).

8.5 Budget Waivers

**Policies**

CMN does not regularly have students receiving tuition and fees waivers or paid by another organization. Any student who is receiving such assistance is required to notify the Office of Financial Aid. Or if the business office becomes aware of such an arrangement, the Financial Aid Office will be informed.

**Procedures**

In cases where a student may be receiving a tuition and/or fee waiver or have a component of the cost of attendance paid by another organization, that payment would be accounted for as estimated financial aid. The expense would be retained in the student's budget.

**Resources:**

HEA 472(b)
GEN-22-15
HEA 472(a)(6)
HEA 472(a)(7)
2022-23 FSA Handbook, Vol. 3, Ch. 2, July 2022
8.6 Budget Appeals

**Policies**

Upon request, the Financial Aid Office may review a student's budget and if appropriate request an adjustment. These requests are reviewed and approved by the Financial Aid Manager.

**Procedures**

Students must submit supporting documentation to request an adjustment to his/her budget. The cost of attendance adjustment form can be found on the CMN web site: https://resources.finalsite.net/images/v1638830112/menomineedu/plqngfyqaybohf9msakf/CostofAttendanceAdjustment20-21.pdf

Examples of changes to standard budgets which can be considered include, but are not limited to:

1. The cost of child care for single parents (or parents with a spouse also in college) with dependent children may be added to a standard budget.

2. Special needs - students with unique needs for educational support may be allocated funds to cover reasonable costs associated with disabilities that are not already covered by other resources.

3. Unusual Medical expenses

8. X - Reserved for Institution Use
Section 9: Packaging Financial Aid

9.1 Packaging Philosophies

Policies
Financial assistance at CMN is awarded based upon student eligibility. Students are informed they should fill out the FAFSA application as soon as they can. The sooner they complete the Free Application for Federal Student Aid, the more likely they will be eligible for all grants available. Because of funding limitations CMN cannot always meet 100% of a student's financial need.

Procedures
The Financial Aid Manager will determine the packaging policy for CMN. Because CMN has limited funds primarily from Federal and State resources, the institution has little if no impact on establishing eligibility. The Financial Aid Manager will consult with the Dean of Student Success as needed regarding packaging decisions.

9.2 Available Funds and Number of Eligible Students

Policies
Determining the total funds available to all applicants includes an evaluation and projection of anticipated funding along with matching requirements and administrative expense. This is the responsibility of the Financial Aid Manager.

Procedures
CMN receives award notification for the Federal Campus Based Programs, FSEOG and FWS, through the campus based website. The State of Wisconsin sends the Financial Aid Office information detailing annual fund allocations through the secure HEAB website. (See Section 3, Financial Aid Programs)

The Financial Aid Manager will first determine the amount of Administrative Cost allowance to take from campus based allocations. This is done prior to determining how much is available to package to students.

9.2.1 Usage of the ACA for Campus-Based Program Amounts

Policies
CMN does use the administrative cost allowance to support the administration of the Federal student aid programs.

Resources:
673.7(c)
2022-23 FSA Handbook, Vol. 6, Ch. 1, July 2022

Procedures
See section 9.2 Procedures for details on how the ACA is calculated at CMN.

9.3 Packaging Groups

Policies
The student's financial aid award at CMN is determined by largely by the date of application and the student's need as calculated by the Office of Financial Aid.

Procedures
The Federal Pell Grant is the foundation of a student's award package because eligibility is determined by the Federal government. CMN will first award an eligible student the correct Pell Grant award using the Empower packaging program.

There are specific steps for students who are enrolled in Session 3 as described in this document:
9.4 Determining Amounts

**Policies**

After Pell eligibility is determined the Financial Aid Office will proceed to award state, tribal and other funds according to remaining need.

**Procedures**

Refer to Section 3, Financial Aid Programs for detailed descriptions of award amount determination.

9.4.1 Program-Specific Amount Determinations

**Policies**

The Financial Aid Manager is responsible for determining award amount for specific types of financial aid programs. See Section 3, Financial Aid Programs for detailed descriptions.

**Procedures**

Section 3, Financial Aid Programs.

---

9.5 Package Construction

**Policies**

Financial aid awards are compiled by the Financial Aid Manager after verification is completed or upon receipt of the FAFSA for those students not required to complete verification. Budget construction is the responsibility of the Financial Aid Manager. See Section 8 for a description of budget construction.

**Procedures**

Federal Pell Grants are awarded first to eligible students and then state, tribal and other funds are awarded according to remaining need and student's eligibility. See Section 3, program for details.

Students are notified of their award via email.

9.6 Packaging Other Educational Resources

**Policies**

Students are encouraged to seek assistance from outside resources. It is required that all outside assistance be reported to the Financial Aid Office. Student aid, including outside resources, may not exceed the cost of attendance. Therefore, if a student has been awarded by the aid office and receives an outside award, an adjustment to the original award letter may be necessary. If an adjustment is made, the outside aid will replace self-help aid if possible.

**Procedures**

Within CMN, due to the small size of the institution, staff are working closely with the financial aid office to coordinate any other financial resources that may be provided to a student. Students are also reminded to disclose any other scholarships or grants to the financial aid office.

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**Resources:**

- P.L. 115-141
- 675.10(c)
- Electronic Announcement, 5/17/21 (GENERAL-21-31)
- 676.10(b)
- 685.200
- 686.11
- 690.62(a)
- 686.21
- GEN-23-02
- Electronic Announcement, 11/19/18
- Electronic Announcement, 5/13/10
- 2022-23 FSA Handbook, Vol. 1, Ch. 5, June 2022
- 2022-23 FSA Handbook, Vol. 3, Ch. 6, July 2022

- HEA 480(j)
- GEN-06-05
- GEN-16-05

- HEA 480(j)
9.6.1 Student Support Services Grants

**Policies**
CMN does not participate in this financial aid program.

**Resources:** HEA 402D

**Procedures**
Not applicable.

9.6.2 Gaining Early Awareness and Readiness for Undergraduate Programs Funds

**Policies**
CMN does not participate in this program.

**Resources:** HEA 404E

**Procedures**
Not applicable.

9.6.3 AmeriCorps Benefits

**Policies**
CMN relies on students who are receiving AmeriCorps benefits to notify the Office Of Financial Aid. The Financial Aid Manager would work with the student and the AmeriCorps program to access the benefits.

**Resources:** 694.13, 694.14

**Procedures**
CMN does not participate in the Federal Direct Loan programs. The addition of AmeriCorps Benefits would be noted as estimated financial aid in the student's record in Empower. If the student received significant other aid and was in an overaward situation as a result of AmeriCorps benefits, the Financial Aid Manager would determine the appropriate remedy and notify the student.

**Resources:** 45 CFR 2528.10

9.6.4 Vocational Rehabilitation Benefits

**Policies**
Students who are eligible for Vocational Rehabilitation benefits are required to notify the Office of Financial Aid. It is the responsibility of the Financial Aid Manager to coordinate the student's vocational rehabilitation benefits with the other financial aid the student is receiving.

**Resources:** 2022-23 FSA Handbook, Vol. 3, Ch. 7, July 2022

**Procedures**
The student is required to bring any vocational rehabilitation forms requiring institutional certification to the Office of Financial Aid. The Financial Aid Manager will complete them and retain a copy in the student's file. Disbursement of vocational rehabilitation funds are provided to CMN and disbursed to the student to cover direct educational expenses first and the student is refunded any excess. The submission of vocational rehabilitation documents will not automatically prompt a review of the students cost of attendance for adjustments based upon disability related expenses. The student is required to submit a request for professional judgment in these cases.

**Resources:** GEN-06-19

9.6.5 Bureau of Indian Affairs Grants
Policies

The Financial Aid Manager is responsible for the coordination of Bureau of Indian Affairs and Tribal Higher Education funds for eligible CMN students.

<table>
<thead>
<tr>
<th>Resources:</th>
</tr>
</thead>
<tbody>
<tr>
<td>673.6(b)</td>
</tr>
<tr>
<td>673.6(c)</td>
</tr>
<tr>
<td>2022-23 FSA Handbook, Vol. 3, Ch. 7, July 2022</td>
</tr>
</tbody>
</table>

Procedures

Refer to section 3.6.1. regarding award amounts and the process for coordination of this aid at CMN.

9.6.6 Health and Human Services Program Grants and Loans

Policies

CMN does not participate in Health & Human Service grants and loans.

<table>
<thead>
<tr>
<th>Resources:</th>
</tr>
</thead>
<tbody>
<tr>
<td>42 USC Chapter 6A, Subchapter V; Health Professions Education</td>
</tr>
<tr>
<td>HHS SFA Guidelines</td>
</tr>
</tbody>
</table>

Procedures

Not applicable.

9.7 Employer-Provided Educational Assistance

Policies

If students are receiving educational benefits through an employer, they are to notify the Office of Financial Aid of this support.

<table>
<thead>
<tr>
<th>Resources:</th>
</tr>
</thead>
<tbody>
<tr>
<td>IRS Pub 970, Tax Benefits for Education, Chapter 10</td>
</tr>
</tbody>
</table>

Procedures

CMN will notify the student of the impact of an employer related educational benefits on the financial aid award via the financial aid award notification which is sent via email.

9.8 Crossover Payment Periods/Summer Financial Assistance

Policies

CMN does award financial aid for eligible students enrolled in a summer term. Summer is considered a trailer, the last semester of the academic year.

<table>
<thead>
<tr>
<th>Resources:</th>
</tr>
</thead>
<tbody>
<tr>
<td>690.64(a)(2)</td>
</tr>
<tr>
<td>2022-23 FSA Handbook, Vol. 3, Ch. 3, July 2022</td>
</tr>
<tr>
<td>2022-23 FSA Handbook, Vol. 3, Ch. 7, July 2022</td>
</tr>
<tr>
<td>2022-23 FSA Handbook, Vol. 3, Ch. 4, July 2022</td>
</tr>
<tr>
<td>2022-23 FSA Handbook, Vol. 3, Ch. 5, July 2022</td>
</tr>
<tr>
<td>2022-23 FSA Handbook, Vol. 6, Ch. 2, July 2022</td>
</tr>
</tbody>
</table>

Procedures

Those students enrolled for summer term who are eligible for Federal Pell Grant are first evaluated for any remaining Pell Grant eligibility. If the student has not used their entire allocation during the academic year, the appropriate remainder may be used during the summer enrollment period. Remaining monies may be used for summer only.

9.9 Package Notification

Policies

Students receive notice of financial aid via an award offer. CMN_award_email The date of the award offer is noted in the Empower System.

<table>
<thead>
<tr>
<th>Resources:</th>
</tr>
</thead>
<tbody>
<tr>
<td>668.165(a)</td>
</tr>
<tr>
<td>2022-23 FSA Handbook, Vol. 3, Ch. 7, July 2022</td>
</tr>
<tr>
<td>2023-24 FSA Handbook, Vol. 4, Ch. 2, March 2023</td>
</tr>
<tr>
<td>2022-23 FSA Handbook, Vol. 2, Ch. 7, August 2022</td>
</tr>
<tr>
<td>2023-24 FSA Handbook, Vol. 4, Ch. 7, August 2022</td>
</tr>
</tbody>
</table>

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**Procedures**

Students awards are listed as accepted. If a student want to decline an award they can do this on their MyEmpower portal or send a statement to the Financial Aid Office.

### 9.9.1 Packaging Appeals

**Policies**

The Office of Financial Aid will consider appeals that may result in a change in the financial aid award offer.

**Procedures**

The student is required to submit written documentation supporting the request for a revision due to a change in circumstances. If a change in the award is allowable, the program manager will make an adjustment and release a revised award letter. (Refer to Section 9, Professional Judgment)

### 9.9.2 Aid Package Revisions

**Policies**

The Financial Aid Office will automatically consider a revision to a student's financial aid package in certain circumstances. These circumstances are largely initiated by the institution and are the responsibility of the Financial Aid Manager.

**Procedures**

The circumstances leading to revision may include the following:

1. There is conflicting information in the student's file that has been reviewed and resolved.
2. There are changes as a result of verification.
3. There is a change in the availability of funds.
4. There is an error by staff member in the Office of Financial Aid.

The information provided with the financial aid award letter acknowledges the right of the Financial Aid Office to change any student's award. Students are sent a revised award letter as soon as possible. In the case of an error within the Office of Financial Aid it is customary to contact the student personally or send an email.

### 9.10 Overawards and Overpayments

**Policies**

An over-award occurs any time a student's disbursed financial aid (federal, state, institutional and outside aid) and other resources exceeds the cost of attendance for the award period. In some cases an allowable tolerance will accommodate the over-award. But in some cases, the Office of Financial Aid staff must resolve the over-award.

**Procedures**

The Financial Aid Office may discover an over-award in any number of ways. Payroll records for students working through the FWS program may indicate a student has earned more than awarded. A student may change his/her enrollment which can result in an over-award if an adjustment to cost of attendance is required. Student reports additional resources which impact the estimated financial aid and resulting eligibility. An administrative error results in an over-award. Or there can be cases where a student intentionally deceives or misrepresents information to obtain funds.

### 9.10.1 Resolving an Overaward or Overpayment When Student is Liable

**Resources:**

- 673.5(a)
- 685.301(a)(4)
- 686.21(c)
- 686.21(d)
- 2023-24 FSA Handbook, Vol. 4, Ch. 3, March 2023
Policies

The Office of Financial Aid at CMN is responsible for resolving an overaward once it is identified.

Resources:
- 673.5(f)(3)
- 686.34(b)
- 686.34(c)
- 690.79(b)
- 690.79(c)

Procedures

If at any time during the award period, the student receives additional estimated financial aid that was not initially considered in calculating the student's award for campus-based aid and if the estimated financial assistance combined with the expected financial aid will exceed the student's need, the amount in excess of the student's need is considered an over-award. There is a $300 over-award tolerance for campus-based aid. If the student's package is over awarded by $300 or less (as a result of a late outside award, not the school's awarding methodology) and campus based funds are part of the package, staff can consider the student to not be over awarded.

If eliminating the over-award is not possible, the aid administrator must reduce the over-award using the following sequence:

1. An over-award over $300 based on surplus earnings through Federal College Work Study must be counted as a resource for the next academic year.
2. If an over-award occurs due to fraud, the Financial Aid Manager must be notified and corrective action taken.

9.10.2 Resolving an Overaward or Overpayment When School is Liable

Policies

In cases where an over-award is the result of an administrative error, the student is not liable. It cannot be considered an over payment and reported as such to NSLDS. The Financial Aid Manager will implement the following procedures to resolve these situations.

Resources:
- 668.21
- 673.5(f)
- 686.34
- 690.79
- 2023-24 FSA Handbook, Vol. 4, Ch. 3, March 2023

Procedures

The institution will take action to reduce or eliminate next semester's over payment. The institution reserves some institutional funds to resolve overawards or overpayments if that will resolve the error. In some cases there is no resolution other than returning federal or state funds and then billing the student for any remaining amount.

9.X - Reserved for Institution Use
Section 10: Professional Judgment (PJ)

10.1 PJ Authority and Individuals Who May Exercise It

**Policies**

The Financial Aid Manager at the College of Menominee Nation has exclusive authority to adjust a student's eligibility using professional judgment. This decision is final and cannot be appealed to the U.S. Department of Education. It is the policy of CMN that the reason for the adjustment must relate to the student's described special circumstances and must be documented in the student's file.

**Procedures**

The Financial Aid Manager will review the request and documentation submitted to determine what adjustment, if any, is appropriate. Data elements submitted on the FAFSA can be changed as a result of this review. Or the Financial Aid Manager may choose to change the student's cost of attendance. In cases where the student's financial aid award is changed as a result of a professional judgment decision, the Financial Aid Manager will update the student's award.

10.2 Circumstances for Which PJ Adjustments are Allowed and Resulting Actions Taken

**Policies**

Student circumstances which may warrant professional judgment include, but are not limited to:

1. Unusual medical expenses not covered by insurance.
2. Divorce or separation.
3. Death of a parent or spouse.
4. Loss or change in employment expenses.
5. Loss of untaxed income.

**Procedures**

Once a request for a professional judgment adjust is submitted, the financial aid manager will determine if the documentation supports an adjustment. Generally professional judgment may be used to change a data element on the FAFSA. The change is made through FAA Access to the student's FAFSA. The FA Manager will make a screen shot of the initial recalculation prior to resubmitting the FAFSA and retain that document in the student's file. The student will be notified of the anticipated change in the award offer as a result of the data element change. When the new ISIR is received at CMN, the Financial Aid Manager will update the award offer based upon the new eligibility.

10.3 Requests for PJ Consideration


Policies

Students must submit the CMN Unusual Circumstances or Cost of Attendance adjustment forms for professional judgment review. The form and supporting documents are reviewed by the Financial Aid Manager for determination of next steps.

Procedures

CMN is a small institution and the financial aid manager strives to develop a close working relationship with all applicants. Current and prospective students are encouraged to communicate any financial concerns to the financial aid manager. This allows him to direct the student to complete the request for professional judgment. The ‘unusual circumstances’ form is accessible on the CMN web site.

10.4 PJ Documentation

Policies

The CMN Office of Financial Aid will be 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 is not listed for each case. It is left to the discretion of the Financial Aid Office to select what is appropriate documentation.

Procedures

The documentation required for a specific request is outlined on the Unusual Circumstance Form: It is expected that the documents provided with the request substantiate the situation. In cases where a student is requesting a dependency override, documentation should be provided by more than one individual. One individual can be a member of the student's family. The other individual should be a professional who is not a family member.

10.X - Reserved for Institution Use
Section 11: Disbursements

11.1 Definition of Disbursements and Disbursement Methods

**Policies**

The Office of Financial Aid at CMN is responsible for determining when a student has met all eligibility requirements for the disbursement of financial aid funds, i.e. grants and scholarships. The Finance Office has the responsibility for disbursement of financial aid checks and students with FWS deferments. The Payroll Office has responsibility for processing Federal Work Study paychecks.

**Procedures**

The Office of Financial Aid assures and maintains the accurate and appropriate awarding of aid funds. This information is submitted to the Finance Office. These funds credit to the students account. If there are any monies in excess of charges, the Finance Office is responsible for disbursing that excess to the student.

CMN disburses aid to the student's account when all funds have arrived and the student is registered for the correct number of hours on which their financial aid award is based. The student's eligibility status is checked by the Financial Aid Office through the process of an enrollment problem query through the Empower system. This report is reviewed by financial aid personnel prior to generating the financial aid disbursement roster. This process is applicable for Federal Pell Grants, FSEOG, and state of Wisconsin WHEG and WIG awards.

Other aid is disbursed through a similar but separate process.

CMN requests federal financial aid funds from the federal government through the Advance Payment Method. Under this payment method, the Department of Education accepts a school's request for funds and transfers the amount requested to a designated institutional bank account. The school will not request more cash in this transaction than is needed to make disbursements to students within three business days.

CMN does allow students to charge their book expenses on their student account. This insure students who are Pell Grant eligible are able to access their books by the 7th day of the payment period.

11.1.1 Disbursing Title IV Funds Under a T1 Arrangement

**Policies**

CMN does not disburse Title IV aid under a T1 arrangement.

**Procedures**

Not applicable.
11.2 Disbursing Title IV Funds Under a T2 Arrangement

**Policies**

CMN does not disburse Title IV aid under a T2 arrangement.

**Procedures**

Not applicable

11.2 Disbursement Dates and Schedules

**Policies**

Students are notified of their financial aid eligibility for the academic year via the financial aid award letter. Student awards are accepted as is. A student can decline awards through their MY Empower or they can send a written notice to the Financial Aid Office explaining what award they would like to decline.

Disbursements happen in conjunction with the disbursement schedule for 23-24 academic year. The disbursement schedule can be found on the CMN website.

**Procedures**

If the disbursement of financial aid results in a credit balance, it will be refunded to the student by the Finance (Bursar’s) Office within 14 days of the later of:

1. The date the balance occurs on the student's account.
2. The first day of classes of the payment period or period of enrollment, or the date the student rescinds his or her authorization for the school to retain funds in excess of the amount needed to cover allowable charges.

Each Friday the Student Records & Billing Coordinator will email students with a credit balance refund check at their CMN email address to notify them of the availability of their refund. Student’s can authorize direct deposit of a refund by completing the Direct Deposit Authorization Form on the CMN Student Billing Office web site. A student may also pick up their refund check (if direct deposit is not established) on dates and times established by the Bursar’s Office and published on the institution’s web site and contained in the email notification.

If a student has a refund check available they will be notified by email. IF arrangements are not made
with the Student Records & Billing Coordinator to pick up the checks that day the checks will be mailed to the student's permanent home address as indicated in the institution's Empower system.

11.3 Student and Parent Authorizations

Policies
CMN does not currently allow student or parent authorizations regarding the disbursement of funds.

Resources:
668.165(b)(1)(ii)
668.164(c)
668.164(d)(4)
675.16(d)(1)(ii)
675.16(b)(1)(ii)
668.164(e)(2)
668.164(f)(4)
675.16(b)(1)(i)
2023-24 FSA Handbook, Vol. 4, Ch. 2, March 2023
GEN-12-21
Federal Register, 10/30/15, pp. 67151 to 67155

11.3.1 Disbursing FWS Funds to Pay Current Award Year, Institutional Charges for Tuition, Fees, Contracted Room and Board, and Other Allowable, Educationally-Related Goods and Services

Policies
CMN does allow a student to set up a wage assignment with the student's payroll department.

Resources:
668.164(c)(3)(ii)(A)
668.164(c)(4)
675.16(d)(1)(i)
675.16(c)(5)
675.16(b)(1)(i)
2023-24 FSA Handbook, Vol. 4, Ch. 2, March 2023

Procedures
A minimum payment of $25 to CMN is required in order for the student to establish a wage assignment agreement. Payments may be made weekly, biweekly or monthly. This payment is required until the bill is paid in full. A Bursar hold will remain in place until the bill is paid in full.

11.3.2 Disbursing FWS Funds to Pay Allowable, Prior Award Year, Institutional Charges

Policies
The Office of Financial Aid will work with a student to determine whether they will be receiving enough financial aid to cover the current semester bill and a past bill if applicable. A financial aid agreement must be signed if the student is opting to use this option once it is determined as allowable by the Office of Financial Aid.

Resources:
668.164(c)(3)(ii)(B)
675.16(b)(1)(ii)
675.16(b)(2)
675.16(d)(1)(i)
2023-24 FSA Handbook, Vol. 4, Ch. 2, March 2023

Procedures
The financial aid agreement is signed with the Records & Billing Coordinator. To comply with federal regulations, the maximum allowable amount for prior-year charges is $200.

11.3.3 Disbursing Title IV Funds (Other than FWS) to Pay Allowable, Current Year, Educationally-Related, Institutional Charges Other than Tuition, Fees, and Contracted Room and Board

Policies
CMN does allow students to charge required textbooks to their student account.

Resources:
668.164(c)(3)(ii)(A)
668.165(b)(1)(i)
Procedures

Students who are registered are able to order and charge textbooks to their student accounts typically about a month prior to the start of the semester and through the last day of the first week of classes.

11.3.4 Disbursing Title IV Funds (Other than FWS) to Pay Allowable Prior Award Year, Educationally-Related, Institutional Charges Other than Tuition, Fees, and Contracted Room and Board

Policies

CMN does not allow students to use current year Title IV financial aid to pay allowable prior year educationally related institutional charges other than tuition, fees and contracted room and board.

Resources:

668.165(b)(3)(ii)(B)  
668.165(b)(1)(i)  
2023-24 FSA Handbook, Vol. 4, Ch. 2, March 2023

Procedures

Not applicable.

11.3.5 Holding Excess Title IV Funds (Credit Balances)

Policies

CMN does not allow a student to authorize the institution to hold excess Title IV funds on the students institutional ledger account.

Resources:

668.165(b)(2)-(5)  
675.16(d)(2)-(5)  
2023-24 FSA Handbook, Vol. 4, Ch. 2, March 2023

Procedures

Not applicable.

11.3.6 Disbursing Title IV Funds Under a T1 or T2 Arrangement

Policies

This does not apply as CMN does not disburse aid under a T1 or T2 arrangement.

Resources:

668.164(d)(4)  
668.164(e)(2)  
668.164(f)(4)  
2023-24 FSA Handbook, Vol. 4, Ch. 2, March 2023

Federal Register, 10/30/15, pp. 67151 to 67157

Procedures

Not applicable

11.4 Student and Parent Notifications
Policies
CMN notifies the student of the aid that will be disbursed to the student's billing account through the electronic award notice.

11.4.1 Amounts of Expected Title IV Funds and Disbursement Information

Policies
The specific award amounts are listed on the financial aid electronic award on my Empower. Information regarding the timing of aid disbursements is distributed to students information published on the CMN web site.

Procedures
The Office of Financial Aid is responsible for notifying students of the amount of financial aid offered and what type of aid the student is receiving, i.e. grant or scholarship or work study. CMN does not participate in the Federal Direct Loan program. This information is also described on the CMN web site: Consumer Information, Financial Aid Programs.

11.4.2 Crediting Title IV Loan Proceeds and the Borrower's Cancellation Right

Policies
CMN does not participate in the Title IV student loan programs.

Procedures
Not applicable.

11.4.3 Crediting TEACH Grant Funds and the Student's Cancellation Right

Policies
CMN does not participate in the TEACH grant program.

Procedures
Not applicable.

11.5 Undeliverable Title IV Funds

Policies
The Business Office is responsible for delivering excess funds from a student's account derived from FSA funds to the student. Students are encouraged to establish a direct deposit relationship with CMN via a direct deposit authorization on the institution's web site. If no direct deposit information exists, refund checks are mailed to the student's mailing address as listed in the Empower system. If a direct deposit or check from FSA funds is returned to CMN, the Office of Financial Aid is informed and will attempt to inform the student. If there is updated information for the student that would allow the
refund to be received, the original refund may be canceled and reissued accordingly.

**Procedures**

Federal financial aid regulations require any Title IV federal funds not received or cashed must be returned to the appropriated federal financial aid program no later than 240 days after it was issued. If a check or EFT is returned, the college may make additional attempts to deliver the funds, provided that those attempts are made no later than 45 days after the funds were returned or rejected. In case CMN does not make another attempt, the funds must be returned before the end of the initial 45-day period. CMN must cease all attempts to disburse the funds and return them no later than 240 days after the date it issued the 1st check. Under no circumstances may unclaimed Title IV FSA Funds escheat to the state, or revert to the College, or any third party. All refund checks sent to CMN students must be cashed with 90 days from their issue date. After this period, un-cashed checks become stale dated and are non-negotiable and must be voided back to student accounts.

**11.6 Recovery of Title IV Disbursements When Student Does Not Begin Attendance**

**Policies**

CMN is required to take attendance. Aid disbursement does not occur until after the five day drop/add period at the start of each semester.

**Procedures**

The financial aid manager and the student achievement specialist are monitoring attendance reports from Empower. Prior to disbursement, attendance is confirmed by the financial aid manager. The Empower enrollment/attendance report is used by the Financial Aid Manager to confirm attendance prior to disbursements. Students who are identified after the first five day drop/add period as not attending are administratively withdrawn. The Financial Aid Manager will be informed and will cancel the aid for that student.

**11.X - Reserved for Institution Use**

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**Resources:**

668.21
674.16(f)
676.16(d)
685.303(b)(4)
2023-24 FSA Handbook, Vol. 4, Ch. 3, March 2023
GEN-13-02
Section 12: Satisfactory Academic Progress

12.1 Process Overview and Responsibilities

The CMN Office of Financial Aid has developed a satisfactory academic progress policy to comply with U.S. Department of Education requirements that all schools must establish, publish and apply reasonable standards of progress.

Satisfactory academic progress is a measure of progress towards completion of a student's course of study as established by CMN. Students must meet the minimum standards to maintain eligibility for Federal financial aid. The standards apply to all Federal aid programs and to all students who are degree seeking and eligible for Federal aid.

The CMN Office of Financial Aid measures each student's academic progress by calculating completed credits as a percentage of attempted credits each semester, including summer semester. All attempted credits are counted, including transfer credits, whether or not federal financial aid was received or the coursework was successfully completed.

It is the responsibility of the Financial Aid Manager to identify the satisfactory academic progress for each student applying for and receiving financial aid at CMN. The Satisfactory Academic Progress policy is reviewed and approved by the Chief Academic Officer and the Dean of Students Success.

12.2 Same As or Stricter Than

Policies

CMN's academic good standing policy requires a student to maintain a cumulative 2.0 GPA. There is no quantitative requirement and therefore the CMN SAP policy is stricter than the institution's academic standards.

Procedures

It is the responsibility of the Financial Aid Manager to review the institution's academic good standing policy to ensure the Office of Financial Aid policy for satisfactory academic progress is the same as or stricter. This is done in collaboration with the institution's Chief Academic Officer and the Dean of Student Success.

12.3 Categories of Students

Policies

At CMN all three SAP measures described in sub-sections 12.4 through 12.8 apply to all degree seeking students. Enrolled students who have a prior baccalaureate degree are not eligible for Federal student aid at CMN by institutional policy. Therefore they are exempt from the SAP policy.

Procedures

The Office of Financial Aid is responsible for determining which students are required to meet SAP based upon their status at CMN. SAP standing is calculated using the Empower student information system. The process includes automated calculations which are reviewed by the Financial Aid Manager.

12.4 Qualitative Measure

Policies

Students must earn a minimum cumulative GPA of 2.0, including the grades in any developmental/remedial classes, at the end of each semester, including summer. Grades of A, AB, B, BC, C, CD, D, and F are included in the Financial Aid program GPA. Grades of W, I and AW are not included in the Financial Aid Program GPA. The Financial Aid Manager is responsible for populating the Empower system with the grading rules so the SAP automated process properly reflects institutional policy.

Procedures

Resources:
See Section 12.3, Categories of Students. The CMN Empower Processing SAP document details the process used to identify students not meeting the qualitative requirement.

12.5 Quantitative Measure

**Policies**

Students must successfully complete at least 67% of all courses attempted. For example students who have attempted 9 credits must earn 7 credits to maintain a 67% completion rate. Students who have attempted 24 credits must earn 17 credits to maintain a 67% completion rate. The quantitative measure is assessed at the end of every semester.

**Procedures**

See Section 12.3, Categories of Students. The CMN Empower Processing SAP document details the automated process to identify students not meeting the quantitative requirement.

12.5.1 Maximum Time Frame

**Policies**

Students must complete their programs of study within 150% of the time frame allowed. For example, students enrolled in a 60 credit hour degree program must complete their program before exceeding 90 attempted credits. For student who change their majors, only coursework attempted and earned that is applicable to the new program of study is counted in the maximum time frame. Developmental and remedial classes are excluded from the 150% calculation. The maximum time frame requirement is assessed at the end of each semester.

If a student graduates, or changes degree or certificate programs, the SAP calculation will reset to only count those credit hours that are applicable to the new program of study. Courses that do not count toward the new program of study will NOT be included in the SAP calculation.

**Procedures**

It is the responsibility of the Financial Aid Manager to review the automated process run at the end of each semester in the Empower system specifically to identify students who may have exceeded the 150% time frame. See Section 12.3 CMN Empower Process SAP, process labeled "SAP Transcript Manual Review" for the steps required.

12.5.2 Pace

**Policies**

Throughout enrollment, as soon as it can be determined that a student is not on target to graduate within 150% of the standard program length, financial aid will be suspended.

**Resources:**

- 668.34(a)(6)
- 668.34(b), Maximum timeframe
- 668.34(a)(5)
- 668.34(a)(5)(ii)
- 2023-24 FSA Handbook, Vol. 1, Ch. 1, February 2023
- 668.34(a)(11)
- Federal Register, 9/2/20, p. 54742
- Electronic Announcement, 1/15/21 (OPE Announcements-21-05)
- Electronic Announcement, 8/21/20
- Electronic Announcement, 5/15/20

**Resources:**

- 668.34(b), Maximum timeframe
- 2023-24 FSA Handbook, Vol. 1, Ch. 1, February 2023

**Resources:**

- ED Program Integrity Q&A—Satisfactory Academic Progress, SAP-Q3/SAP-A3, SAP-Q4/SAP-A4
- 668.34(a)(5)
- 668.34(a)(5)(ii)
- 2023-24 FSA Handbook, Vol. 1, Ch. 1, February 2023
- Federal Register, 9/2/20, p. 54742
Procedures

It is the responsibility of the Financial Aid Manager to review manually SAP reports run through the Empower system to identify those students who mathematically cannot meet the 150% time frame requirement. This review is done as the end of each semester. The student's record in Empower will be updated to reflect that suspension is occurring because the student's pace is not meeting SAP standards.

12.6 Evaluation Periods

Policies

A student's satisfactory academic progress is assessed at the end of each semester or payment period, including summer.

Procedures

CMN does not have a differing SAP policy for specific programs. All student's enrollment is assessed at the end of each semester, fall, winter and summer.

12.6.1 Financial Aid Warning

Policies

If a student fails to meet the qualitative and/or quantitative components the student may be granted a “warning” semester during which time aid can be received. There is no warning period if students fail to complete their degree or certificate program within 150% of the program length. If at the end of the warning period (a semester/payment period) the student is still not meeting either the qualitative or quantitative measures the student will become ineligible for financial aid for the next semester and is placed on financial aid suspension.

Procedures

Students who do not meet the standards of satisfactory academic progress requirements will be notified via an email shortly after the semester that their progress falls below the standards. The email will inform the student of their status, suspended or warning. Students may also review their current SAP status on their Empower portal.

12.6.2 Financial Aid Probation

Policies

The Office of Financial Aid may grant the student who failed to meet the satisfactory academic progress requirements a "probationary" semester based on these circumstances and reinstate financial aid eligibility for one additional semester.

Probation is given for the next period of enrollment to allow one final opportunity to demonstrate satisfactory academic progress. As part of the probation process, the student is required to agree to a required academic plan. Students can continue to receive financial aid while on probation and an academic plan, even though they are not in good standing. If upon review at the end of the probation semester the student has not returned to good standing, but has met the requirements of the academic plan, the student will continue on probation and the academic plan for the subsequent semester of enrollment.

In cases where the student is suspended for exceeding the maximum time frame, upon appeal and if approved for additional credits to graduate from the student's current program, all classes must be successfully completed. If the classes are not successfully completed, the student will be suspended and no longer eligible for financial aid. If a student in this situation changes to another major, degree or certificate program and has not completed the degree or certificate program for which the appeal was approved, the student will no longer be eligible for financial aid and will not be considered for another appeal for maximum time frame.

Any student who has been academically suspended more than once must apply for reinstatement. Any student academically suspended for the first time who would like to waive the suspension period must also apply for reinstatement.

Resources:

668.34(a)(3)
2023-24 FSA Handbook, Vol. 1, Ch. 1, February 2023

668.34(b), Financial aid warning
668.34(a)(8)(i)
668.34(c)(1)
2023-24 FSA Handbook, Vol. 1, Ch. 1, February 2023
668.34(c)(2)(i)

668.34(a)(8)(ii)
668.34(b), Financial aid probation
668.34(c)(2)(ii)
2023-24 FSA Handbook, Vol. 1, Ch. 1, February 2023
668.34(c)(3)
668.34(c)(4)
668.34(d)(2)
Procedures

Students who are suspended from receiving financial aid will be provided the option to appeal. The appeal is submitted to the Financial Aid Office. The Financial Aid Manager will review SAP appeals and forward them to the Chief Academic Officer who will determine if probation is an appropriate action. If this is the case, the Financial Aid Manager will update the student’s status in the Empower System and notify the student via email of this decision. It is the responsibility of the Financial Aid Manager to determine after the end of the subsequent semester if the student has met the SAP standards and is back in good standing.

12.7 Appeals

Policies

Federal regulations allow for certain cases in which the school may waive the standards. Specifically, if a student's failure to be in compliance with one or more of the areas of satisfactory academic progress is due to events beyond the student's control, such as a student's extended illness or death in the immediate family, or other significant trauma, and if such mitigating circumstances can be appropriately documented for the specific term(s) in which the deficiency occurred, the student may appeal to the Office of Financial Aid. It is the responsibility of the Financial Aid Manager to notify the student of the suspension and the opportunity to appeal.

Procedures

Students access the appeal form on the CMN website. SAP appeal decisions are determined on a case by case basis by the Chief Academic Officer of the institution. Extenuating circumstances beyond a student’s control include, but are not limited to:

1. Serious illness or medical emergencies of the student or in the immediate family.
2. Death of an immediate family member or caregiver.
3. Domestic violence.
4. Involuntary call to active military duty, including the National Guard and First Respondents in a natural disaster.
5. Other extraordinary/emergency situations and life changing events.

An appeal should be submitted by the withdraw deadline for session one classes each semester as published on the institution’s web site. Any SAP appeals received after this date will not be reviewed for the current semester. Students will be notified of the final decision of the appeal through their CMN email address within 2 weeks. A student whose appeal has been approved will be put on probation and/or on an academic plan. (See Section 12.7.1)

When an appeal is received in the Office of Financial Aid, it is tracked in the Empower system. The FA Manager will scan the document and place it in a digital folder in the FA drive for SAP Appeals received, pending a decision. Once a decision is made, the appeal is moved to a different folder for Completed SAP Appeals.

12.7.1 Documentation

Policies

Appeals from students who are not meeting satisfactory academic progress can be submitted to the Office of Financial Aid along with any appropriate documentation. There is no specific documentation requirements required. However the student is required to meet with her Student Achievement Specialist for assistance in

Resources:

668.34(a)(9)
668.34(b), Appeal
2022-23 FSA Handbook, Vol. 2, Ch. 3, August 2022
Electronic Announcement, 3/5/20
2023-24 FSA Handbook, Vol. 1, Ch. 1, February 2023
668.34(c)(3)(ii), (iii)
668.42(c)(2)(ii)
668.34(d)(2)(ii), (iii)
Preparation the appeal for financial aid reinstatement.

**Procedures**

The Financial Aid Manager will receive and track when an appeal has been submitted. After reviewing the appeal, the Financial Aid Manager will forward it to the CMN Chief Academic Officer who will make the final decision regarding the appeal and inform the FA Manager. If the appeal is considered complete, the Chief Academic Officer will notify the FA Manager who will follow up with the student.

The appeal can be approved with the student being placed on probation, meaning SAP good standing can be met within the next semester in which the student enrolls. The appeal can be approved on the basis of an academic plan. Typically this means it may take the student more then one semester to meet the standards of progress. The plan will include specific requirements the student will be required to meet to maintain eligibility.

The appeal may be denied. The student will not be eligible for Federal student aid until meeting SAP. Once a determination has been made, the Empower system will be updated to reflect that decision and the student will be notified via email.

**Satisfactory Academic Progress Appeal Form**

**12.7.2 Academic Plans**

**Policies**

As part of the appeal process, an academic plan is required if the appeal is approved. The Financial Aid Manager is responsible for monitoring the student's progress based upon the academic plan.

**Procedures**

The requirements of an academic plan will vary depending on the student's specific academic history. In general, students who are approved for probation will be required to successfully complete 100% of all attempted hours and earn at least a 2.0 GPA in each subsequent semester of enrollment until returning to good standing. A student who has been reinstated on probation with an academic plan will be identified at the end of the semester through the Empower automated SAP process. (See section 12.3). The Financial Aid Manager will manually review the student's progress based upon the output report generated from the Empower system and the student's appeal plan.

**12.8 Regaining Eligibility**

**Policies**

After financial assistance has been withdrawn, students may re-establish satisfactory academic progress by attending subsequent semesters at their own expense and improving hours and/or semester grade point average to meet the required standards.

**Procedures**

The Financial Aid manager reviews the SAP status of all ISIRs that are loaded into the Empower system. A student who through enrollment re-establishes financial aid eligibility after previously being suspended would be identified at the time the student's ISIR is received. Also, students are encouraged to discuss their SAP standing with the Financial Aid Manager at any time if they feel they have re-established eligibility.

**12.9 Treatment of Nonpunitive Grades, Repeated Courses, Audited Courses, Pass/Fail Courses, Withdrawals, and Incompletes**

**Policies**

Non-credit courses are not eligible eligible for Title IV assistance and do not satisfy requirement of any Title IV eligible academic programs. They are not considered in the satisfactory academic progress calculations.
Grades of "W", "AW", and "I" are not included in the qualitative GPA calculation but are included in the quantitative calculation.

When repeating a course, students may receive financial aid for a course if the previous grade was an "F" or "W". In addition, students may also receive financial aid for a repeated course if the initial grade earned does not meet the requirements for the program or meet the prerequisite requirement for the next course in the sequence. Students may only receive financial aid for a repeated course one additional time once they have passed the class (received a grade of "D" or above.

All courses attempted that are applicable to a student’s current degree or certificate program are included in the SAP calculation, regardless of the College’s Academic Amnesty award.

**Procedures**

The rules regarding grades and the CMN SAP policy are established within the Empower system tables. It is the responsibility of the Financial Aid Manager to insure the set up is correct and review all output from the SAP automated system. See Section 12.3 CMN Empower SAP Processing document describes the automated and manual review process.

### 12.10 Treatment of Remedial, Enrichment, and English as a Second Language Courses

**Policies**

Developmental courses do not count towards the 150% maximum time frame limit, however the credits attempted and grades earned in these courses are counted in the qualitative and quantitative academic progress measures.

**Procedures**

The Financial Aid Manager is responsible for monitoring remedial, enrichment and ESL courses and to insure that programming in the Empower system is properly counting these courses for the purposes for SAP. See Section 12.3, the Empower SAP Processing Document for additional details.

### 12.11 Treatment of Consortium, Change of Major, Second Degree, and Second Major Courses

**Policies**

Students who have completed a baccalaureate or professional degree from an institution, regardless of whether the institution is accredited or a foreign school, are not eligible for federal or state grant funds. It does not matter whether the degree is accepted or recognized by CMN.

If a student who was previously ineligible for financial aid due to exceeding the maximum time frame graduates and enters a new degree program, the student could regain eligibility for financial aid if they have not exceeded the maximum credit time frame for the new degree. If a student graduates, or changes degree or certificate programs, the SAP calculation will reset to only count those credit hours that are applicable to the new program of study.

Courses that do not count toward the new program of study will NOT be included in the SAP calculation for maximum time frame.

**Procedures**
The Empower SAP Process document referenced is Section 12.3 would indicate that a student may be exceeding the maximum time frame. However as described in that document, the FA Manager does do a manual review process. This will allow him to determine if there has been a major change and if a manual recalculation is required to determine if the student should be suspended or not.

12.12 Completion of Degree Requirements

**Policies**

If a student has already taken and completed the coursework required to graduate from a specific degree or certificate program, they are no longer eligible to be considered for future financial aid as long as they remain the specific program of study, whether or not "official" graduation has been granted.

**Procedures**

The Financial Aid Manager is notified by the Registrar's Office if a student has completed her program. This is noted in the Empower system. There may be situations where a student completes a program and then applies for and is admitted to a second program. For example, a student may complete an associates degree and then decide to pursue a bachelor's degree at CMN. This student would have to apply and be admitted to the new degree program. The student would be eligible for Federal Financial Aid in the new program. The FA Manager will normally be informed by the student who would be seeking additional financial aid for the new program.

12.13 Notices

**Policies**

The CMN Satisfactory Academic Progress policy is published on the institution's web site: [https://www.menominee.edu/admission-aid/financial-aid/faqs](https://www.menominee.edu/admission-aid/financial-aid/faqs)

**Procedures**

Students are notified of the Satisfactory Academic Progress policy when they receive their financial aid offer. They are directed to review rights and responsibilities on the institution web site. Students are instructed to contact the Office of Financial Aid for a paper copy.

12.X - Reserved for Institution Use
Section 13: Return of Title IV Funds

13.1 Process Overview and Applicability

Students who chose to withdraw from all classes at CMN must do so by the designated deadline as listed on the Administrative calendar. They will receive grades of "W" in all classes for that semester. Students who wish to withdraw completely from the College must do so officially by meeting with their Student Achievement Specialist for assistance. The "W" has no effect on GPA but is considered for financial aid purposes. Students are advised to consult with the Office of Financial Aid before withdrawing completely from CMN. Students who stop attending classes in the middle of a semester without official withdrawal are identified through the regular monitoring of attendance records by academic officers who will notify the Financial Aid office.

Resources:
668.22(a)(6)(ii)(B)(1)
668.22(a)(6)(ii)(A)(2)
668.22(j)
668.22(i)
668.22(a)(6)
668.22(a)(6)(ii)(A)(2)
668.22(e)(4)
668.22(e)
668.22(a)(6)(ii)(A)(1)
668.22(l)(9)
668.22(a)(6)(ii)(B)(2)
668.22(b),(c)
668.22(e)(2)
668.22(e)(3)
668.22(g)(1)
668.22(h)
668.164(j)(3)(i)

Policies
Federal regulations determine how federal student aid (Title IV) funds are handled when a recipient withdraws entirely prior to the end of a payment period. If a student officially withdraws from all classes, known as a total withdrawal, before a semester or term has ended a calculation must be made to determine what portion of the student's federal student aid should returned to the Federal Student Aid programs. Any student who withdraws before 60% of the term has occurred can expect to have some repayment of funds due. The College of Menominee Nation may be required, on behalf of the student, to send funds back to the federal government based on what funds were earned or unearned, using the student's last day of attendance. It is the responsibility of the Office of Financial Aid to determine if a return of funds is required.

**Procedures**

All withdrawals are to be completed with the students' assigned Student Achievement Specialist. The Office of Financial Aid is notified once the withdrawal is complete. Students considering full withdrawal are advised to discuss the impact of the decision with staff in the Office of Financial Aid prior to making a final decision.

Unofficial withdrawals are defined as those situations where a student who began the semester cease attending classes at some point during the semester/term without officially withdrawing. Those students are typically identified at the end of the semester on the basis of grades. The Office of Financial Aid will request a report from the Institutional Research Department of all students that received all grades of "F" and/or "W" to determine if a return of aid is required.

**13.2 Withdrawal Date**

**Policies**

For the purposes of the Return of Title IV aid, the official withdrawal date is defined as:

1. The date the student begins the withdrawal process prescribed by the school or
2. The date the student provided the school official notification of the intent to withdraw or
3. The last date of academically related activity that the student participated in, for a student who does not begin the process or provide notification.

Per institutional policy, instructors at CMN are required to take attendance at the beginning of class period every day. In cases where a student does not officially withdraw, the financial aid representative will use the class attendance records to determine the students last date of attendance.

**Procedures**

Per institutional policy, CMN instructors are required to take attendance. This is electronically noted in the Empower System. Students who officially withdraw are required to begin the process with their assigned Student Achievement Specialist. A form is completed which is dated with the last day of academic of attendance. This is confirmed by reviewing the attendance records. Then the student is instructed to meet with the FA Manager and provide this withdrawal document that indicates the last day of attendance/withdrawal date.

**13.3 R2T4 Formula Calculation**

**Policies**

Once the Office of Financial Aid is notified of a student's withdrawal, the R2T4 calculation must be completed within 30 days of the date the institution determines is the date of withdrawal. Unearned Title IV aid must be returned no later than 45 days after the date of determination of a student's withdrawal.

**Procedures**

The Financial Aid Manager will first calculate the number of calendar days the student was enrolled in for the award period. Using the instructors attendance sheets submitted through Empower, the students last date of

**Resources:**

668.22(a)(2)(ii)(A)(3)-(5)
2022-23 FSA Handbook, Vol. 5, Ch. 2, June 2022
668.22(a)(2)(ii)(C)
GEN-04-12
GEN-04-03
600.2, Academic engagement
668.22(a)(2)(ii)(A)(3)-(5)
668.22(a)(2)(ii)(B)
2022-23 FSA Handbook, Vol. 5, Ch. 2, June 2022
668.22(a)(2)(ii)(C)
668.22(b)
GEN-04-12
668.22(b)(3)(i)(A)
668.22(c)
668.22(c)(1)(iv)
668.22(i)(9)
668.22(c)(2)(i)
668.22(c)(5)
668.22(d)
668.22(i)(3)
GEN-04-03
668.22(i)(6)
668.22(i)(7)
2022-23 FSA Handbook, Vol. 5, Ch. 1, June 2022
GEN-11-14
668.4
668.22(e)(5)
668.22(g)(1)(ii)
2022-23 FSA Handbook, Vol. 5, Ch. 2, June 2022
668.22(g)(2)
668.22(g)(3)
GEN-04-12
668.22(l)(1)
attendance is determined. The formulas used to determine what amount of unearned Title IV aid are as follows:

1. Percentage of term in attendance = calendar days attended up to last date of attendance/total calendar days in the term (Less breaks of 5 consecutive calendar days or more).
2. Percentage of term not in attendance = 100 - percentage of term in attendance.
3. Unearned Title IV Financial Aid = percentage of the term not in attendance * the amount of Title IV Financial Aid disbursed (or to be disbursed).

Example:
The number of calendar days in a full semester is 112 days. The last date of attendance is determined from attendance sheets submitted by instructors. For this example the student attended 28 calendar days and then withdrew.

Percentage of term completed = 28/112 = 25%
Percentage of term not in attendance = 100% - 25% = 75% (Note: Department of Education rounding rules for R2T4 is to round to three decimal places)
Title IV aid disbursed to the student was $1000
Unearned Title IV Financial Aid = 1000 X 75% = $750.

The Financial Aid Manager will use the Common Origination and Disbursement R2T4 software to calculate the return of aid. CMN participates in the Federal Pell Grant and SEOG programs only. This document is saved in a folder labeled withdraws and R2T4 for the designated academic year. The FA Manager makes a manual adjustment in the Empower system to reflect the reduction in the Federal grant and disburses that change to the student account. He is responsible for updating COD as well.

Each week the FA Manager provides a disbursement report to the Registrar/Business Office of financial aid transactions. This reconciliation process would include reductions due to the return of funds. The Business Officer then returns those funds through the G5 system. The resulting adjustment may produce a balance due from the student.

The Financial Aid Manager will prepare the notification that is emailed to the student with the information and results of the R2T4 calculation. This is tracked in the Empower system with the date the notification was sent.

13.4 Post-Withdrawal Disbursements

Policies
A post withdrawal disbursement occurs when a student received less Title IV aid than the amount earned. A post withdrawal disbursement of any federal grant funds would first be used toward any outstanding charges before any funds are returned to a student. The student will be notified of eligibility for a post withdrawal disbursement by the Office of Financial Aid within 30 days from the date CMN determines as the date of withdrawal.

Resources:
668.22(a)(5)
668.22(a)(6)
668.164(j)
2022-23 FSA Handbook, Vol. 5, Ch. 2, June 2022
Federal Register 9/27/2012, p. 59314
GEN-04-12
GEN-04-03

Procedures
If a post withdrawal disbursement is still needed the grant funds will be disbursed as soon as possible but no later than 45 days after the school determines the date of withdrawal. Any credit balances given to a student’s account

Resources:
668.22(a)(6)(iii)(A)
as a result of the Return to Title IV calculation and Institutional refund calculation will be disbursed as soon as possible, but no later than 14 days after the date the calculation is completed. This is a rare occurrence at CMN. But it does happen when a student does attend classes at the start of the semester for a few days and then ceases attending prior to Federal Aid disbursements. (See Section 13.3)

13.5 Returning Unearned Funds

**Policies**

Federal Funds are returned by CMN to the original program within 45 days according to the following order:

1. Federal Pell Grant
2. Federal SEOG
3. Other Federal Aid

State funds are not considered Federal Title IV funds, but the same Return to Title IV policies are applied. In cases where the student receives institutional, private or third party funding the institution will work with the original provider to determine if the aid is to be returned.

A student is entitled to keep all earned aid. Unearned Federal financial aid is returned to the original source by CMN. CMN will send a bill to the student for the unearned portion of his/her financial aid.

**Procedures**

The Finance Office is responsible returning unearned Federal funds to the original program via the G5 process. This is completed within 45 days of the withdrawal date.

In cases where the student unofficially withdrew by not attending, the FA manager requests a report from the Institutional Research Department at the end of every term. This report will include a list of all students who earned all grades of "F" and/or "W". The FA Manager will then review the attendance records to confirm a last date of academic activity. If a return of funds is required, the calculation is completed within 30 days after the day of the term. The Finance Office is responsible for returning any Federal funds within 45 days after the term via the G5 system.

The Financial Aid Manager notifies a student via email of returned funds and the result of the Return of Title IV calculation.

13.5.1 Overpayment Resolution

**Policies**

It is the policy of CMN to return Federal funds on behalf of a student. This will usually result in a balance due from the student.

**Procedures**

Students are notified of the repayment and balance due via a billing statement provided by the Finance Office. Students are not allowed to enroll at CMN in the future without either a payment plan to resolve the balance due or payment in full is required.
Section 14: Institutional Refunds

14 Institutional Refunds

Policies
The Student Billing Office administers the refund policy for CMN.

If a student withdraws from all courses the following tuition refund schedule is followed:

1st to the 5th business day of the term -- 100% refund

6th to the 10th business day of the term -- 50% refund

After the 10th business day of the term -- 0% (no refund)

Refunds are not given to students for partial withdrawals or to those who exchange classes after the drop date for a course which has fewer semester hours of credit. If a student's schedule is reduced for the convenience of CMN, as in the cancellation of classes for insufficient enrollment, the tuition shall be adjusted without penalty.

Procedures
Any tuition adjustments made by the Billing Office are reflected on the student's billing account and can be seen on My Empower.

14.1 Institutional Refund Components

Policies
Tuition is recalculated in cases where the student withdraws within the refund period.

Procedures
The business office will determine if a charge is institutional or non-institutional. Typically the only non-institutional charge would come through the book charging process approved by the institution.

14.2 Institutional Refund and Repayment Appeals

Policies
CMN does not allow students to appeal the amount of an institutional refund.

Procedures
Not applicable

14.2.1 Documentation

Policies
Not applicable

Procedures
Not applicable.

14.X - Reserved for Institution Use
Section 15: Title IV Fraud

15.1 Student Fraud

**Policies**

Students and parents who willfully submit fraudulent information will be investigated to the furthest extent possible. All cases of fraud and abuse will be reported to proper authorities.

**Procedures**

If the decision is made by the Manager to pursue the possibility of denying or canceling financial aid due to a suspected case of fraud, a written request is to make an appointment is sent to the student. If the student does not make an appointment, the Financial Aid Manager may:

1. Not process a financial aid application.
2. Not award financial aid.
3. Cancel financial aid awarded to the student.
4. Determine that financial aid will not be processed for future years.

All processing of the application or disbursement of funds shall be suspended until the Manager has made a determination as to whether the student shall be required to make an appointment.

15.2 Institutional and Third-Party Fraud

**Policies**

The College of Menominee Nation does require employees to commit to an employment ethics policy. It is included in the Human Resources policy manual provided to all employees upon their employment. This policy does require all employees to conduct institutional business with integrity and to comply with all applicable laws in a manner that excludes consideration of personal advantage or gain.

15.3 Referrals

**Policies**

If after reviewing a student's application and documentation or other evidence of suspected fraud, the Financial Aid Manager is responsible for the referral process.

**Procedures**

The FAO Manager will contact the Department of Inspector General if it is determined a case must be referred. This is done at 202-755-2270 or 1-800-MIS-USED.
16 Audits

16.1 Type of Audit

The Manager of the Office of Financial Aid will be the liaison with the institution's auditors. As a private non-profit institution that participates in the Federal Financial Aid programs, CMN must engage an external auditor to complete the annual compliance audit and audit of financial statements. The audits are submitted via EZ Audit by March 31 of each year for compliance with federal policies.

Policies

16.2 Audit Submission Schedule

Policies

It is the responsibility of the Chief Financial officer to inform the Financial Aid Manager when the audit is scheduled and what documentation may be required.

Procedures

The Chief Financial Officer will submit the annual audit via the EZ Audit process once it is completed.
The Financial Aid Manager will be informed when the audit is submitted.

16.X - Reserved for Institution Use
Section 17: Reserved for Institution

17 Reserved for Institution

Resources:

P.L. 117-2
P.L. 116-260
P.L. 116-136
Federal Register, 3/22/21, pp. 15208 to 15209
CARES Act: Higher Education Emergency Relief Fund Information
CRRSAA: Higher Education Emergency Relief Fund (HEERF II) Information
Higher Education Emergency Relief Fund (HEERF) II Public and Private Nonprofit Institution (a)(1) Programs (CFDA 84.425E and 84.425F)
Frequently Asked Questions
New HEERF Guidance on expenses through the pandemic and calculating lost revenue
ARP: American Rescue Plan (HEERF III) Information
Section 18: Appendices

18.1 Forms and Correspondence

18.2 Resources and Reference Documents

18.X - Reserved for Institution Use