

Transitions Career Institute

30-50 Whitestone Expressway, Suite 400, Flushing, N.Y. 11354

Phone: (718) 362-9500; Fax: (718) 362- 9508

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Fiscal Office Responsibilities

POLICY: To ensure Transitions Career Institute coordinates and manages the Fiscal Office in ways that reflect compliance with the US Department of Education standards in the areas of Budgeting for Financial Aids, Receiving and Disbursements of Financial Aids to qualifying students and refunding unearned funds to the US DOE.

PURPOSE: To ensure TCI coordinates and manages Financial Aid and other revenue with efficiency and effectiveness in the areas of budgeting, receipt, allocation, disbursement and refund of financial aids to students and ensure that cash management and accounting information systems, recording and reporting conform with US Department of Education expectations.

PROCEDURE:

- The Fiscal office coordinates with the Financial Aid Office to ensure proper cash management procedures, including timely disbursement of funds.
- The coordinated efforts include, but are not limited to, the following processes:
 - To process Title IV cancellations of student and school refunds- the Financial Aid office generates cancellation of student aid and/or authorizations that results in a school refund R2T4
 - When obtaining authorizations to refund unearned Title IV funds – the Directors of Nursing, together with the Financial Aid Director determines through established rules and processes, the amount of funds to be returned; gets the approval of the management.
 - To ensure Title IV disbursement and adjustments are properly and consistently recorded and reported- The Fiscal Office utilizes information in the ECM inflow ledger (reconciled with the financial aid office) to make appropriate disbursements and adjustments and utilizes the Orbund application to update federal aids into students' ledger accounts.
 - To establish and implement the school's refund policy – The Fiscal Office follows the procedures as stated in the refund.
 - To process Return of Title IV (R2T4) funds per FSA laws and regulations – The Financial Aid Office calculates the R2T4 refunds and the Financial Aid Director adjusts the aid funds and coordinates the appropriate return amount with the Fiscal office to ensure the funds are returned to the correct FSA fund program.

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- To report FSA expenditures and reconcile cash between school records, bank statements, and federally reported balances- The Financial Aid Director prepares the annual FISAP in coordination with the Fiscal Office utilizing the appropriate school records, bank statements, and federally reported balances.
- To maintain and provide general stewardship of federal funds and a cash management system that meets FSA disbursement requirements, laws, and regulations.
- Administrative Organization of the Financial Aid Office and Division of Responsibility between Financial Aid and Fiscal Offices. TCI maintains a clear and separate division of responsibility for the administration of financial aid programs which are divided between the Financial Aid Office, and the Fiscal Office.
- In order to maintain this division, each office is accountable for the following responsibilities:
 - The Financial Aid Office;
 - Prepares Required Reports and Reconciliation
 - Maintains Financial Aid Records Support
 - Monitors Financial Aid System Processing
 - Assists fiscal office monitor Financial Aid Operations
 - Manages TCI's Cohort Default Rate
 - Processes Loans to Students
 - Maintain Accurate Records in Financial Aid Systems
 - Coordinates Student Employment
 - Coordinates State Grants and Scholarships
 - Provides Customer Service Award and Distribute Financial Aid to Students
 - Processes Pell Grants, Subsidized Loans, Un-Subsidized Loans, Parents' PLUS Loans and other Private Loans.
 - The Fiscal Office responsibilities include but are not limited to the following:
 - Maintains and disburses accurate Ledgers/bills
 - Collects payments for student accounts
 - Disburses funds to students
 - Reports scholarship donations to the Financial Aid Office
 - Performs cash management and;
 - Reports on 90/10 status regularly
 - Coordinates 1098T reports to students
 - Maintains financial records and audits
 - Coordinates and reports on the annual fiscal operations
 - Carries out regular accounts reconciliations

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Fiscal Operations Report and Application to Participate (FISAP)

FISAP is the application process that allows schools to participate in (Program Participation Agreement) Title IV programs through the USDOE's School Eligibility Service Group (SESG). Approval to participate in the Title IV allows school to provide federal Funds (in different ways) to students with financial need to help pay for postsecondary education costs.

POLICY: To ensure Transitions Career Institute's FISAP reports are in conformity with the guidelines and expectations of the USDOE on a regular basis as well as align with the procedural approach outlined by TCI to achieving that aim.

PURPOSE: To ensure TCI's FISAP reports are accurate, complete, timely and; represents that which it purports to report.

PROCEDURE:

- Transitions Career Institute applies for and receives program funds directly from the U.S. Department of Education by submitting an application, the Fiscal Operations Report and Application to Participate (FISAP).
- TCI uses the Fiscal Operations Report portion of the FISAP to report expenditures under the campus-based programs in the previous award year and apply for and receive funds for her program.
- The Financial Aid Director administers this process and submits the application to the Department electronically through the FISAP on the Web for each award year.
- The Financial Aid Director ensures that the application is submitted prior to FISAP deadline date which is published annually in a Federal Register Notice. The date is October 1 or the last week day prior to October 1. The actual deadline date is posted in the Federal Register as well as provided by Electronic Announcement by the US Department of Education.
- The Department then allocates funds for the program by providing TCI with tentative allocation information in January of the following year and with final allocation information by the 1st of April.
- The Financial Aid Director works with the Director of Nursing and the Finance Director to collect the necessary statistics to complete the report.
- The Director 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 through certified mail.

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General Terms of Eligibility

POLICY: The General Terms of Eligibility spells out the general eligibility requirements for Title IV Aid funding and Grants by the USDOE for post-secondary school students who desire to finance their education through the grants and loans provisions.

PURPOSE: To ensure Transitions Career Institute applies the detailed requirements as specified by the US Department of Education in determining qualifications for admissions and eligibility for Financial Aid.

Federal Title IV Programs: The USDOE Title IV Program has the following programs:

- Federal Pell Grants
- William D. Ford Federal Direct Student Loan Program: Federal Stafford, subsidized and unsubsidized, Federal Parent Loan for Students - FDSL
- Federal Supplemental Educational Opportunity Grant - FSEOG
- Federal Work Study - FWS
- Aid to Native American Students

Transitions Career Institute Program Only participates in the following programs:

- Federal Pell Grants
- William D. Ford Federal Direct Student Loan Program: Federal Stafford, subsidized and unsubsidized, Federal Parent Loan for Students – FDSL

PROCEDURE: The process for completing the FAFSA:

1. Complete the Free Online Application for Federal Student Aid (FAFSA) or Renewal Application at www.fafsa.ed.gov.
2. Have a High School Diploma or General Equivalency Diploma. Effective July 2012 federal regulations no longer allow new students to be eligible under ability to benefit standards. Students who have previously enrolled as Federal Ability to Benefit students prior to July 2012 will be able to continue to be eligible for Federal Title IV Aid.
3. Be accepted for admission into a program at TCI approved for Federal Financial Aid pursuing a certificate program taught at TCI.
4. Be a U.S. Citizen or eligible Non-Citizen.

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5. Have a valid social security number.
6. Sign a statement of Educational Purpose and a certification statement on overpayment and default (found on the FAFSA).
7. Register with Selective Service (males age 18-25) if required to do so by law.
8. Complete all verification and federal reject codes requirements. Students may be selected for verification or clarification of application information. No aid eligibility can be processed until the student provides required information. If provided information varies from the application information, the student's record may have to be submitted to the Federal Central Processor for corrections before any aid is processed.
9. Maintain Satisfactory Academic Progress in your degree or certificate program to continue receiving funds. See the Title IV Satisfactory Academic Progress Policy.
10. Not be in default on any prior educational loans.
11. Not have borrowed in excess of Federal aggregate loan limits.

Determination of Financial Need

- Financial Aid from most of the major federal programs is based on financial need (except for unsubsidized Federal Direct Stafford and PLUS loans). When you apply for federal student aid, using the Free Application for Federal Student Aid (FAFSA), TCI uses the information you provide in a formula established and approved by the U.S. Congress called Federal Methodology (FM).
- The formula calculates your Expected Family Contribution (EFC). This is the amount that you and your family will be expected to have available to contribute to your education. If your EFC is below an amount set by the federal government, you should be eligible for a Federal Pell Grant, assuming you meet all other eligibility requirements.
- Your EFC is also used in an equation to determine how much funding you may need to attend school. $\text{Cost of Attendance} - \text{EFC} = \text{Estimated Financial Need to Attend School}$
- The Financial Aid Office subtracts your EFC from your cost of attendance. You can get further information on the EFC formula by contacting the U.S. Department of Education at 1-800-4FEDAID, or www.studentaid.ed.gov.

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Special Conditions

- Sometimes a family may have extenuating circumstances that are not reflected on the FAFSA. Examples are a change in income or loss of a job; separation, divorce, or death of a family member, high medical or dental expenses, or other situations.
- In such instances, a student can request the TCI Financial Aid Office to use professional judgement to re-evaluate their federal aid eligibility. In all cases, students must first file a FAFSA. Once the results are received by TCI, the student can fill out a Special Conditions form and attach required documents.

Cost of Attendance (COA)

- This is the amount that the Financial Aid Office estimates it will cost you to attend a program at TCI.
- The COA is calculated based on rules established by the U.S. Congress. The COA includes tuition and fees, allowances for room and board, books, supplies, transportation, loan fees, purchase or lease of a computer, dependent care costs, costs related to disability and miscellaneous expenses.
- Note that students must supply documentation of computer costs, dependent care costs, and costs related to disability to have these included in the COA. This is required as expenses for these areas do not apply to all students and may vary significantly from student to student. For students who attend less than six semester hours each semester, the COA includes only tuition and fees and an allowance for books, supplies, and transportation.
- Students with unusual expenses may request an evaluation of their COA by submitting a letter to the Financial Aid Office detailing the circumstances, amount of expenses involved, and providing documentation of the expenses. The COA determines a student's estimated costs related to attendance at school. It is not intended to reflect full support requirements. Financial Aid provides assistance for educational expenses, not full support. Students should be aware that requests for adjustments to the COA do not, in any way, indicate that there is financial aid available to cover such adjustments.

New York CLASS Loan:

- TCI is an accredited and registered school to process NYCLASS loans for students who are residents of New York

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- Students are advised to contact the financial aid office for more information on the eligibility requirements dependent on having submitted an application for Title IV through FAFSA.

COST OF ATTENDANCE

Cost of Attendance Definition (COA)

- This is the amount that the Financial Aid Office estimates it will cost student to attend a program at TCI.
- The COA is calculated based on rules established by the U.S. Congress. The COA includes tuition and fees, allowances for room and board, books, supplies, transportation, loan fees, purchase or lease of a computer, dependent care costs, costs related to disability and miscellaneous expenses.
- Note that students must supply documentation of computer costs, dependent care costs, and costs related to disability to have these included in the COA. This is required as expenses for these areas do not apply to all students and may vary significantly from student to student. For students who attend less than six program hours each program, the COA includes only tuition and fees and an allowance for books, supplies, and transportation.
- Students with unusual expenses may request an evaluation of their COA by submitting a letter to the Financial Aid Office detailing the circumstances, amount of expenses involved, and providing documentation of the expenses. The COA determines a student's estimated costs related to attendance at college. It is not intended to reflect full support requirements. Financial Aid provides assistance for educational expenses, not full support. Students should be aware that requests for adjustments to the COA do not, in any way, indicate that there is financial aid available to cover such adjustments.

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Transitions Institute's Cost of Attendance is listed below:

Cost & Expenses

	On-Campus	Off-Campus (Away from Home)	Off-Campus (with Family)
Tuition & Fees	\$22,500	\$22,500	\$22,500
Books & Supplies	\$2,400	\$2,400	\$2,400
Room & Board		\$15,210	
Personal Expenses		\$6,435	\$6,435
Registration Fee	\$100	\$100	\$100
Criminal Background Check	\$30	\$30	\$30
Total Cost of Attendance	\$25,030	\$46,775	\$31,465

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AWARDS & PACKAGING

Policy:

TCI's seeks to define procedures and processes that reduce as many mistakes as possible while packaging awards with a view to complying with regulations and DOE's guidelines.

Purpose:

Is to ensure policy establishes a procedure that monitors application processes on a one-on-one basis. This also helps insure that students are not awarded until verification is complete and all missing documents are resolved. In addition, TCI ensures that our process takes into account PLUS loan application, or additional unsubsidized loan.

Procedure:

We strive to fulfill the mission of TCI by providing accurate, efficient and courteous service to students, parents and other guests while administering all financial aid programs with integrity and compliance to all federal, state and institutional regulations.

- When awarding various awards, the primary goal is to help students be able to pay off their bill for each program.
- There are numerous regulations required in the administration of federal financial aid. The Financial Aid Office follows the regulations outlined each academic year in the Federal Student Aid Handbook as well as other federal publications.
- Our primary goal regarding federal student aid is to award students the maximum amount they are eligible to receive, minimize any unnecessary loan debt and comply with all federal regulations.
- State Financial Aid. The State of New York Higher Education Authority (NY-HESAA) authorizes TCI to award funds from the state of New York higher education student's assistance authority.
- TCI follows all state guidelines to ensure that only eligible students receive state financial aid awards. All state funds are limited to a certain allocation each academic year. Therefore, the Financial Aid Office takes the philosophy to award funds when possible to students with the greatest amount of financial need and those that need the most help in paying off the remaining balance of their school bill after having exhausted their Title IV loans.
- In addition, students can take advantage of outside/alternative private loans as needed. TCI awards and disburses all outside financial aid per the instructions and requirements of the organization funding the award.

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Determining Award Amounts

- Award amounts are often determined by federal guidelines. This includes awards like Pell grant, subsidized and unsubsidized loans and FSEOG.
- Pell grant uses an annual Pell chart released by ED and direct loans are awarded based on a student's SAP /grade level, annual loan limits, financial need and lifetime aggregate loan usage based on federal mandated limits.

Package Construction

- When packaging student awards, all grants, or gift aid, and subsidized funds should be awarded prior to any unsubsidized or private loans being awarded.
- Once grants, gift aid, and subsidized funds have been awarded, if the student needs additional funding then the unsubsidized loan may be awarded next. If the parent is denied a PLUS loan, then the student may be awarded additional unsubsidized funds.
- Student financial aid awards continue to evolve throughout the school year as they receive new awards or there are updates on a student's FAFSA. When a student receives a new outside award after their initial award has been sent to them, the award package is redone based upon the student's financial need. Work study and loans are adjusted before a student's grant would be adjusted.

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Over Awards & Overpayments

Over Awards: this occurs when the total of all aid received by the student exceeds the student's cost of attendance budget, thereby requiring the financial aid office to reduce or cancel awards in the student's financial aid package.

Policy:

TCI policy does not allow for reduction or cancellation of students' Pell Grant or Federal Supplemental Education Opportunity Grant (FSEOG) awards to eliminate an over award situation.

Purpose:

Is to ensure that students funding for their education is accurate and sufficient as applied for without creating unnecessary liabilities for either the student or TCI.

Procedure:

In most cases, student loans and/or federal work study funds will be reduced or cancelled.

These over award policies pertain to students who have been awarded funds under any of the following need-based programs:

- Federal Pell Grant • Federal Supplemental Educational Opportunity Grant (FSEOG)
- • Federal Work-Study
- • Federal Subsidized Loan (FFEL or Direct)

Overpayments: occurs when a student is paid more funds than they are eligible for.

Policy:

If a financial aid overpayment is made as a result of a student's error or failure to report requested information, TCI's policy requires that the student repays the amount of the overpayment.

Purpose:

Is to ensure that students funding for their education is accurate and sufficient as applied for without creating unnecessary liabilities for either the student or TCI.

Procedure:

- The Financial Aid Office may reduce the student's federal award(s) in a subsequent enrollment period during the same award year the overpayment occurred.
- If the overpayment amount cannot be satisfied by deducting the amount from a future disbursement, the student is responsible for making direct restitution.

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- As required by federal regulations, the Financial Aid Office will report the overpayment to the Department of Education via the National Student Loan Data System (NSLDS) within 30 days from the date when the overpayment was created.
- Indication of an outstanding overpayment will be recorded on future output documents generated by the Department of Education, and may prevent the student from receiving certain types of financial aid funding

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Ordering IRS Transcripts Policy

TCI uses verification as a process by which students' application for financial are reviewed for accuracy. A number of FAFSA applications are selected for verification and the process must be completed before financial aid can be awarded. Students selected for verification who did not use the IRS data retrieval tool are required to submit an official tax return transcript from the IRS as copies are not acceptable.

Policy:

Supports the Financial Aid Office in the process of FAFSA application to only accept official IRS tax returns transcripts from students in the process of financial aid application and provide students with clear guidelines on how to obtain official transcripts from the IRS.

Purpose:

Is to ensure uniformity and remove doubts in what kind of tax returns is acceptable in the application process.

Procedure:

Tax filers can request a free transcript of their federal tax return for the applicable tax year from the IRS in one of three ways:

1. Available on the IRS website www.irs.gov
 - In the **Tools** section of the homepage, click **Get transcript of student's tax records**.
 - Click on **Get transcript online**.
 - Create an account.
 - Click on appropriate year.
 - View student's transcript as a PDF file.
2. Telephone Request
 - Available from the IRS by calling 1-800-908-9946.
 - Follow the prompts to enter student's SSN and numbers in student's street address.
 - Select **Option 2** to request an IRS Tax Return Transcript and then enter the year student are requesting.
 - If successfully validated, student can expect to receive a paper IRS Tax Return Transcript at the address that was used in the telephone request within five to 10 days.

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- IRS Tax Return Transcripts requested by telephone cannot be sent directly to a third party.

3. Paper Request Form

- Download **IRS Form 4506T-EZ**.
- The paper form provides an option to have the transcript mailed directly to a third party.
- Provide the address to which student want the transcript mailed.
- Mail or fax the completed form to the appropriate address or number provided on page 2 of the form.
- If successfully validated, student can expect to receive a paper IRS Tax Return Transcript at the address provided on the form.

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DISBURSEMENT OF TITLE IV FUNDS

Financial aid is considered disbursed when funds are applied to the student's ledger. Each financial aid award has various statuses as the award goes through the process of being disbursed.

Policy:

TCI's seeks to assure and maintain the accuracy and completeness of awarding aid and funds with a view to complying with regulations and DOE's guidelines.

Purpose:

Is to ensure policy establishes a procedure that monitors disbursement processes from the billing point to receipt of funds and eventual crediting of the funds into students' ledger accounts.

Procedure:

- The Director of Financial Aid at TCI, following the guidelines of attendance and billing, initiate the billing of funds in accord to packaging reports in line with the Clock-hours for the program (450, 450, 148, 148)
- Receipt of funds is then reconciled with the CEO's office before being passed to the Fiscal office to be applied to the student's ledger.

Responsibility for Disbursement of Funds and Disbursement Methods

- The Financial Aid Office assures and maintains the accurate and appropriate awarding of aid funds.
- The fiscal office is responsible for crediting the funds to the student's account. This maintains a separation of duties between the party that awards aid and the party that disburses it.
- In most cases, the method of disbursement involves the Financial Aid Office transferring a student's award to the Fiscal Office by creating a batch inside the Orbund software. The funds show on the student's ledger after the Fiscal Office processes and releases that batch.

Disbursement Procedures

- The type of financial aid determines the disbursement procedure.
- In general, federal aid like Pell grant and direct loans are originated and disbursed to TCI's account with an assigned disbursement date.
- Once the disbursement is approved by the CEO after the reconciliation of inflows with the billing from the Financial Aid Office and the disbursement date has arrived, funds are disbursed to student accounts and applied to each student's ledger by the Fiscal Office.

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- When TCI receives funds from private Lenders on behalf of students, the Fiscal Office lets the Financial Aid Office know that funds have been received through EFT.
- The Financial Aid Office sends the electronic batch through Orbund and the Fiscal Office applies the funds to the student's billing ledger.
- When an enrolled student submits their FAFSA after the start of the program or completes verification after the start of the program, then any Pell grant they are eligible to receive will be disbursed after awarding is complete and the Pell award has been originated and disbursed to the ECM website. This can be done throughout the program as students finalize their FAFSA and become eligible for a Pell grant.
- Direct Student Loans and PLUS—Students enrolled at least half time must complete three steps in order to receive direct loans funds. These include accepting the loan in the student portal, completing a Master Promissory Note (MPN) and completing loan entrance counseling. (Some PLUS borrowers do not have to complete loan entrance counseling.)
- In most cases, students complete all of the required steps prior to the start of the program.
- When a student has not completed all three steps, loans will not be disbursed on that date. Once a student does finalize all steps during the program, direct loan funds will generally be disbursed within seven to ten days.
- Private/Alternative Loans—Private/alternative loans (including Sallie Mae and PLUS and New York state loans) are disbursed to enrolled students once funds are received from the lender.
- Students and parents are notified of disbursement in the student portal. Awards are applied to their billing ledger in the student portal. Additionally, the Fiscal Office sends monthly statement notifying students not only of their outstanding balance but also of the aid that has been applied to their account and the rights they have regarding the cancelation of any disbursed loans.

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Post Withdrawal Disbursement

The laws and regulations are very specific about how TCI must determine the amount of federal student aid (Title IV) program assistance student have earned and may retain if student withdraws from school.

The Title IV programs that are covered include:

- Federal Pell Grants,
- Iraq Afghanistan Service Grants,
- Federal Direct Stafford Loans,
- Federal Direct PLUS Loans,
- Federal Supplemental Educational Opportunity Grants, and, at CTU only, Federal Perkins Loans.

Policy:

TCI's policy is to ensure compliance with the laws as stated above and simplify the process of compliance and disbursement in ways that present objectivity in funds/ disbursement and refund determination to students.

Purpose:

Is to ensure that all qualifying students receive accurate funds towards their education and their repayment liabilities are as accurately determined as possible.

Procedure:

- When students withdraw during a payment period or period of enrollment, (TCI defines her enrollment period in accordance with the DOE's funding period) and they received (or TCI or parent received on student's behalf) less aid than is earned (based on the federal formula), they may be able to receive those additional funds.
- If students received more aid than is earned, then the excess amount must be returned to the aid program (by TCI and/or by student).
- The amount of assistance that students have earned is determined by a federal formula to calculate the pro-rata percentage of the payment period completed prior to withdrawing. For example; if a student completed 30% of her payment period or period of enrollment, then she earned 30% of the aid she was originally scheduled to receive.
- However, once students have completed more than 60% of the payment period or period of enrollment, they are considered to have earned all the assistance that they were scheduled to receive for that period.
- If students did not receive all of the funds that is earned, then there may be due a post-withdrawal disbursement.

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- If the post-withdrawal disbursement includes Federal Direct Loan funds, then TCI must contact the student and explain her obligation to repay the loans, if disbursed, and get student's permission before the loan funds can be disbursed to them.
- Student may choose to decline some or all of the loan funds so that they don't incur additional debt.
- TCI may automatically apply all or a portion of student's post-withdrawal disbursement of grant aid funds to outstanding tuition, fees, books and supplies (as billed separately by TCI)
- However, TCI needs student's permission to use the post-withdrawal grant aid disbursement for all other non-education related school charges.
- If student does not give permission for TCI to apply aid funds to other education related charges, then the funds shall be offered to the student.
- However, it may be in student's best interest to give permission to allow TCI to apply aid funds to other incurred charges in order to reduce student's debt at TCI.
- Consumer Information Guide June 2016 Page 8 There may be some Title IV funds that student were scheduled to receive but which cannot be disbursed to student once student withdraw because of other Title IV eligibility requirements.
- For example, if student is a first-time, first-year undergraduate student and student have not completed the first 30 days of student's program before student withdraw, student will not be eligible to receive any Federal Direct Stafford Loan funds that student would have received had student remained enrolled past the 30th day.
- If student receives (or TCI or parents receive on student's behalf) excess Title IV program funds that must be returned, the return must be a portion of the excess equal to the lesser of:
 - Student's institutional charges multiplied by the unearned percentage of student's funds or, the entire amount of excess funds.
 - The return of funds is required even if TCI didn't retain this amount of student's aid funds.
- If TCI is not required to return all of the excess funds (e.g., some of excess aid was money that was provided directly to student as a stipend), then student must return the remaining amount. •
- Any Federal Direct Loan funds that must be returned is accomplished as student (or student's parent for a Federal Direct Parent-PLUS Loan) repay the loan in accordance with the terms of the promissory note.
 - That is, student makes scheduled payments to the holder of the loan over a period of time.
 - Any amount of unearned grant aid funds that student must return is called an overpayment.
 - The maximum amount of a grant overpayment that must be repaid is limited to the amount by which the original grant overpayment amount exceeds one-half of the total grant funds student received or were scheduled to receive.
- A student does not have to repay a grant overpayment of \$50 or less. If student is required to return unearned grant aid funds, student must make arrangements with TCI, or the Department of Education to return these funds.

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- If TCI returns federal student aid (Title IV) funds on student's behalf (e.g., some of excess aid was money that was provided directly to student as a stipend), then TCI may also pass that charge on to student for any Title IV program funds that they were required to return.
- The requirements for Title IV program funds when student withdraw are separate from any tuition refund policy that TCI may have. Therefore, student may still owe funds to TCI to cover unpaid institutional charges. If student does not already know what TCI's refund policy is, student can ask for a copy. TCI also provides student with the requirements and procedures for officially withdrawing from school. If student have questions about student's federal student (Title IV) aid program funds, student can call the Federal Student Aid Information Center at 1-800-4-FEDAID (1-800-433-3243).
- Information on Student Aid is also available at www.studentaid.ed.gov. Students and prospective students can also contact the Financial Aid Director at TCI for clarifications when they are in doubt about any of the policy.

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Frequency of Title IV Disbursements

POLICY: Defines periods and intervals at which funds are requested and disbursed to students' education at TCI.

PURPOSE: To ensure Transitions Career Institute satisfies the guidelines as established (by the US Department of Education) for the period at which funds are requested and disbursed into students accounts without compromising their eligibility and ability to pay for their education.

PROCEDURE:

- Financial aid funds received on behalf of eligible students are credited to their accounts after reconciling requests by students through the financial aid office with the statements of funds received through ECM from the US DOE and TCI's bank statements on a regular basis.
- Eligible student accounts are credited by the Fiscal Office on an on-going basis after attendance in classes have been verified after the drop/add period ends.
- If a student's tuition and fee bill is completely paid and they have a credit balance, students shall be issued a refund by TCI's Check immediately.
- Students are expected to pay for their indirect educational related expenses with their own funds until refunds are distributed through cash deposit and installment payments as agreed at the start of program.

William D. Ford Direct Student (Subsidized and Unsubsidized) Loan

- Funds are disbursed in two or more equal installments, (i.e. one in fall, one in spring) after the drop/add period ends each 450 class-hour. Federal regulations require that the first disbursement of Direct Subsidized and Unsubsidized Stafford loans be held for 30 days after the beginning of the loan period for all first year, first-time borrowers.
- All students must be registered and in attendance in at least 30 hours when the loan funds are disbursed. If not, the loan is canceled.

William D. Ford Parent Loans for Undergraduate Students (PLUS)

- Disbursed to the student's account. Credit balances are disbursed to either the student or parent directly. **The Financial Aid Office sends the student a selection form.**
- Excess funds borrowed by students/parents are refunded via TCI's check.
Extenuating Circumstance(s) disbursements

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Federal Aid Programs in which TCI Participates

- TCI will evaluate eligibility for the Pell, Direct Subsidized and Unsubsidized Loans, and state grants, as well as Stafford and alternative loans.
- Upon receipt of ISIR, TCI can move forward in determining the student's awards.
- Pell is determined by the student's EFC.
- State grants are determined based on the student's financial information listed on the ISIR and the state of residency.
- Subsidized loan eligibility is determined by $\text{COA} - \text{EFC} - \text{Financial Aid that Affects Need}$.
- Unsubsidized loan eligibility is calculated by $\text{COA} - \text{Financial Aid}$, taking into consideration the subsidized loan, within the loan limits.
- PLUS loan eligibility is calculated as $\text{COA} - \text{Financial Aid}$.
 - The Federal Pell Grant Program provides need-based grants to low-income undergraduate students and certain post-baccalaureate students to promote access to postsecondary education. Pell grants are awarded based on an annual Pell chart/table released by the Department of Education.
 - Generally, Pell grants are based on a student's EFC, enrollment status and the COA at TCI.
 - Amounts are determined by the annual Pell chart/table.
 - TCI uses Pell grant formula in awarding

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Loan Deferment & Forbearance

TCI's Financial Aid Office participates in a variety of financial aid programs. Assistance may include scholarships, grants and loans. Scholarships and grants are gift awards which do not have to be repaid. Loans and work opportunities are considered self-help awards since repayment or performance of duties are required.

A deferment or forbearance allows students/ borrowers to temporarily postpone making their federal student loan (principal and interests) payments or to temporarily reduce the amount (principal and interests) they pay during a period of time and during the tenor of the loan.

Policy:

TCI's Loan Deferment & Forbearance policy describes the information provided by Director of Financial Aids to all admitted students during the entrance counselling period, prior to and, during the process of applying for Title IV loans and aids with regards to the individual terms and conditions related to each class of loans and aids they apply for.

Purpose:

Is to ensure that all admitted students understand from the start, the conditions attached to repayment of each class of loans they obtain and what rate of interest are payable on each at what period. This clearly ensures that students are able to plan their finances during the time of enrollment in school and when they finally graduate from TCI.

Procedure:

- The financial aid Director, as part of her responsibilities, explains to each applicant during the process of FAFSA application, all the conditions associated with each class of funding they request.
- This includes, the repayment period of the loans, the interest chargeable on each loan class and period of deferment obtainable on each loan class as well as possible forbearances.
- Students complete the application and make contacts to the lenders in order that regular statements of accounts on loans may be obtained
- Students may revert to the financial aid Director for clarifications where they have doubts regarding the content of the account statements as provided by the lender during the course of their enrollment.
- Students are advised to ensure regular repayments obligations are met in compliance with the terms of the loans repayment and timely deferment should be sought where they estimate that repayment may be difficult.

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Refund policy

TCI REFUND POLICY:

Every applicant who has been accepted for admission into Transitions Career Institute and signs an enrollment agreement has the legal right to rescind or cancel their enrollment without penalty within three (3) business days after signing the agreement. In these cases, the student is entitled to a full refund of all monies paid, excluding the registration fee and the criminal background check fee, if the background check has already been initiated.

When a student withdraws or is withdrawn from the program, TCI uses a two-part process to determine whether the student is entitled to a refund or whether the student owes tuition and fees to TCI and whether any Title IV financial aid awarded to the student must be returned to the U. S. Department of Education (ED).

After the 3-day rescission period, TCI uses its “Tuition Earned” schedule to determine how much of the total program tuition TCI has earned based on how long the student remained in the program. It then uses ED’s “Return to Title IV” (R2T4) policy to determine how much of the Title IV funding, if any, awarded to the student TCI has earned and can keep to apply to the student’s tuition debt and how much, if any, of those Title IV funds must be returned to the Department. Both of those schedules are presented below.

After these calculations have been made, if there is a credit balance due to the student that credit will be refunded within 45 days after the student withdraws or is withdrawn or dismissed.

Purpose:

To ensure Transitions Career Institute adheres to all federal and state guidelines, and to treat and respect the student’s rights regarding their educational responsibilities.

Procedures:

All candidates are accepted into the Licensed Practical Nurse Program after successfully meeting all Admission criteria. Students are given an entrance counselor, if applicable, with the school’s Financial Aid Officer, to discuss the terms and conditions of their financial obligations whether or not they are receiving U.S. Department of Education Title IV funds, or paying their tuition by other personal means. Once a student agrees to the terms and conditions for academic and financial responsibilities, they sign an official Enrollment Agreement, which, outlines the cost of tuition and length of stay, conditions for early withdrawal and cost/ penalties associated with the withdrawal.

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Tuition Earned by TCI

If Withdrawal or Cancellation Occurs	The Institution Will Retain / Earn
During the first week of classes,	(10%) of total program tuition
During the second or third week,	20%) of total program tuition
After the third week but prior to completion of 25% of the program's total clock hours,	(45%) of total program tuition
After completion of 25% but not more than 50% of the program's total clock hours,	(70%) of total program tuition
After completion of more than 50% of the program	(100%) of total program tuition

Students who, at the time of their withdrawal, have not paid the full amount of tuition TCI has earned, are legally obligated to pay the institution any difference between the amount paid and the amount to be retained.

Title IV Return Calculation

To determine how much financial aid, if any, must be returned to the U.S. Department of Education, TCI uses the formula below. The top number, or the numerator, is the total number of clock hours that the withdrawn student attended classes. The bottom number, the denominator, is the total number of clock hours in the payment period. For TCI, the normal payment period is 450 clock hours. The total number of hours completed are counted from the student's first day of attendance to his or her last known date of attendance.

Important Note: If a student attends more than 60% of total clock hours in the payment period, no return of Title IV funds is required.

$$\frac{\text{Total clock hours attended}}{\text{Total clock hours in payment period}} = \frac{\text{Total clock hours attempted}}{450}$$

Note: Students should understand that, even though TCI may be required to return Title IV funds to the U. S. Department of Education, the student will still be financially responsible to pay TCI for any tuition owed after those Title IV funds have been returned.

[Return to title iv policy](#)

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Policy: What

Transitions Career Institute adheres to the U.S. Department of Education's Return to Title IV requirement of retuning funds while also maintaining TCI's Refund Policy to ensure alignment with regulatory guidelines and our internal processes and interpretation of its applications.

Purpose: Why

Is to ensure that TCI make accurate and complete determination, at all times, of qualifying amount of fund to be returned, if any, while ensuring all cases satisfy the conditions precedent to such return employing correct and accurate calculations in the determinations. This also ensure that we did not keep unearned funds in our purse and students are able to see the transparency in the process in accord with US DOE's policy and our internal procedures.

Procedure: How

The Administrative staff who participate in the weekly academic meetings includes: Director of Nursing, Registrar, Financial Aid Officer and Faculty, as applicable, meet regularly, but no later than weekly, to discuss each student's record to ensure accurate and timely processing of all funds in conjunction with TCIs standards of performance, SAP and Title IV regulations. The following steps are taken:

1. The Director of Nursing directs the meeting of all pertinent participants, and reviews at a minimum:
 - A. Academic Performance Report (SAP)
 - B. Daily Attendance Report
 - C. Financial Aid Report
2. If it is determined that a student is not currently in the school due to: failing a course, withdrawal, or took Leave of Absence, the appropriate forms are prepared by the Registrar.
3. The Registrar prepares the SAP which includes the grade earned, determination if the student is making the required 75% attendance and maximum time frame for completion.
4. The Registrar obtains the student signature on the respective form which is then placed in the student's record indefinitely.
5. The Director of Nursing reviews the attendance record which helps to determine the required 75% attendance and maximum time frame for completion.
6. If it is determined that a return to Title IV funds are due to the U.S. Department of Education, TCI or the student, the Director of Nursing sends a memo to the Financial Aid Officer who then prepares the forms with accurate and complete calculation in respect of the R2T4 determination.

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7. The Financial Aid Officer then forwards the request with accurate calculation of determination back to the Director of Nursing and the CEO for their approval.
8. The approval is then forwarded to the Director of Finance & Compliance for action and funds are then returned immediately, but no later than the required 45 days for Title IV.
9. The supporting documentation are returned to the Director of Finance & Compliance for Data Capture/ postings unto the Students' Ledger Account.

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Tuition & Fee Payment

Price of Attendance Tuition and Fees

Transitions Career Institute sets tuition based on overall costs. The main considerations in its deliberations are to maintain the excellence of TCI's academic programs and to ensure that all necessary instructional support resources are available to promote quality teaching and student services.

Tuition Schedule: Practical Nurse Program

- Amount Entrance Examination Fee \$80 (includes \$5 proctoring fee)
- Application Fee (Non-Refundable) \$100
- Lab and Technology Fees \$0
- NCLEX Review Fees \$400
- Graduation Fee \$300
- Criminal Background Check Fee \$30
- Textbooks & Supplies \$2,500
- Tuition \$22,500
- When: During each new student orientation
- How: In TCI's catalog, in enrollment agreement for each new student, and on the TCI's website: www.tci.org The Net Price Calculator is available on the website.

FEES AND DOWN PAYMENT INFORMATION:

The student is responsible for a \$2,000 of total tuition with a minimum down payment of \$1,000 to reserve a seat in the class. There is a non-refundable registration fee of \$100.00 and a criminal background fee of \$30.00. These fees are due at enrollment. Criminal background fee is not included in total tuition.

FEES: Registration-	\$100.00
Books/Supplies-	\$2,400.00
Tuition-	<u>\$22,500.00</u>
TOTAL	\$25,000.00

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TUITION REFUND INFORMATION

Transitions Career Institute's refund policy is based on full-time attendance in courses/ programs exceeding 300 hours, but not exceeding 1200 hours (N.J.A.C. 6A: 18-2.4k (2)). TCI will retain a portion of the tuition and fees as shown below. TCI Administrator must be notified in writing within five (5) business days of the date of withdrawal. TCI shall adhere to the following course/program completion to determine refunds. Please note if student are receiving Financial Aid the refund and withdrawal policies may be based on federal regulations. [See student handbook]

Time of Withdrawal		TCI Will Retain
Within Three (3) business days of signing this Agreement		0% of Total Tuition (\$25,000).
During the Fourth business day of program start date		5% of Total Tuition (\$25,000).
During the First Week		10% of Total Tuition (\$25,000).
During the Second and Third Week		20% of Total Tuition (\$25,000).
After Three (3) Weeks & Prior to completion of 25% of the program		45% of Total Tuition (\$25,000).
After 25% but not more than 50% of the program is completed		70% of Total Tuition (\$25,000).
After 50% of the program is completed		100% of Total Tuition (\$25,000).

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VERIFICATION

The Department of Education selects a number of students for verification process either due to inaccurate information or incomplete information and conflicting information in their application for FAFSA. Some students that submit for a change of dependency or professional judgment or have unusual circumstances or conflicting information could be manually selected for verification by TCI.

TCI verifies any ISIR that is selected by the Department of Education. The only exception to this is when a student's ISIR is selected for verification after they are no longer enrolled for the current academic year and aid had been received when they were enrolled, and has already been disbursed.

Any professional judgment requests or change of dependency requests must be submitted to the Financial Aid Office

Policy:

TCI's policy establishes a procedure that reviews application process on a one-on-one approach with all students with a view to ensuring that all information required to complete the FAFSA application are complete, accurate and verifiable in order to reduce the incidence of conflicts that will normally lead to verifications.

Purpose:

Is to ensure uniformity and consistency in required documentation and forms across the student population.

Procedure:

Students selected for verification are required to submit specific forms to the financial aid office. These include but are not limited to:

- Verification Worksheet
- Parent/Student Tax Return Transcript
- Parent/Student W-2 form
- Low Income/Non-Tax Filer form
- SNAP/Food Stamps Document
- Child Support Paid Document
- Untaxed Income Document
- Statement of Educational Purpose

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- Unaccompanied Youth Form
- Ineligible PLUS Borrower Form
- Statement for Previous Loan Discharge
- Special Circumstances Form
- Dependency Change Request Form
- Financial Aid Suspension Appeal Form

Data Elements to be verified

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

- Adjusted gross income, US Income tax paid, household size, number enrolled in college and certain untaxed income and benefits, along with other data elements must be verified and selected and verified for each student.
- FAAs are required to know whether or not an individual was required to file a tax return; what an individual's correct filing status should be; and that an individual cannot be claimed as an exemption by more than one person.
- Information from the Verification Worksheet is used to compare what is submitted on the FAFSA.
- Corrections are made from the worksheet to the ISIR by the FAA.
- Tax documents must be reviewed line by line to ensure the information on the FAFSA matches the taxes.
- W2's will be reviewed to ensure everything matches the FAFSA, including any contributions to a tax deferred pension or savings plan.

Conflicting & Inaccurate Information

Once TCI learns of a discrepancy between the FAFSA and verification documents, the school is required to correct the information. TCI corrects the information on the ISIR. The school may do so by submitting corrections through FAA Access to CPS, online.

All conflicting information must be resolved before the student can be packaged and have aid disbursed.

Student Notification of Verification Changes

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

Awarding & Disbursement of Funds During Verification

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

Database Matches, Reject ECM's, & C-ECM's Clearance

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

Review of Subsequent ISIR Transactions

- The Director of Financial Aid is required to review all subsequent transactions for a student, even if earlier transactions have been verified.
- First determine if the EFC or any of the "C" flags have changed or if there are new comments or NSLDS information.
- If the EFC has not changed and there are no changes in the "C" flags or NSLDS information, generally no action is required.
- If the EFC does change but it either does not affect the amount or type of aid received or the data elements that changed were already verified, no action is required.

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- But if the EFC changes and the pertinent data elements were not verified, then the FAA must investigate.
- Of course, anytime a “C” flag changes or NSLDS data has been modified, the FAA must resolve any conflicts.

Verification of Enrollment Status

- Enrollment status refers to the level at which a student is enrolled in the program. TCI uses the enrollment statuses of full time status for the awarding of financial aid. Enrollment statuses are defined in the student handbook.
- Students are informed in their award letter of the enrollment status/ year that their financial aid package is based on, and they are instructed to contact the Financial Aid Office if they know that the enrollment year/ status on the award letter is incorrect.
- Students that dropped from the program after approving their bill are repackaged and awards are adjusted/decreased as needed based on their new enrollment status.
- There are two specific exceptions to this.
- Students are required to be enrolled at least half time at the time their federal loans disburse. If a student is enrolled half time as of the census date but drops below half time prior to loan disbursement, then they are no longer eligible for student loans.
- When a student withdraws from all courses (including an unofficial withdrawal) or when they are administratively withdrawn, students can lose financial aid based upon several factors. The amount of aid they are allowed to keep and the amount that must be returned is calculated through the R2T4 (Return to Title IV) process.

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NSLDS PROCEDURES AND RESPONSIBILITIES

Policy:

The Department of Education requires institutions to provide information published by the Department of Education to students at any time that information regarding loan availability is provided. The policy of TCI is to ensure compliance with this requirement.

Purpose:

The publication includes information about rights and responsibilities of students and institutions under Title IV, HEA loan programs. The purpose of the policy is to inform the student or parent that the loan will be submitted to the National Student Loan Data System (NSLDS), and will be accessible by guaranty agencies, lenders, and institutions determined to be authorized users of the data system.

In view of the above, TCI seeks to verify that all students have completed the Master Promissory Note (MPN) online (at www.studentloans.gov) and have received their rights and responsibilities and NSLDS notification prior to disbursing any Title IV loans. Students unable to complete the MPN online will be provided a paper copy of the MPN along with their rights and responsibilities.

Procedure

- NSLDS stores the history of a student's Federal financial aid.
- To access the website, an ID and a password is required.
- Once log-in is established, you can look up to see if they are in default, have a Pell overpayment, or see how much of their current FA award they have left to use.
- When looking up a student on NSLDS, you see at the top of the screen a message that will tell you if the student is not on your transfer and monitor list.
- By clicking on that link, it will automatically take you to the "Add a Student" screen.
- You will need to enter the student name, SSN, date of birth, enrollment begin date (date student is starting school), and the date you wish to begin monitoring (usually the day you are adding the student to the list).
- NSLDS will stop the monitoring process on the 91st day after their enrollment begin date. Any changes to the student's record are usually emailed to the school.
- TCI reports overpayments or changes to previously submitted information to NSLDS within 30 days of the date we learn of the overpayment or change.
- If the grant overpayment is the result of the student's withdrawal and a return to Title IV calculation, TCI contacts the student within 30 days of determining that the student withdrew.
- TCI only reports unresolved overpayments if due to student error.

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- Overpayments that are a result of school error are not reported. TCI uses school funds to repay the overpayment.
- TCI uses the on-line NSLDS screens to report overpayment. Once the overpayment is reported to NSLDS, the student's future output documents will show that the student has an overpayment. The Financial Aid History section of the SAR and ISIR will have information on the overpayment, including whether the student has made satisfactory repayment arrangements

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The Integrated Postsecondary Education Data System (IPEDS)

The IPEDS is a survey systems established by the US Department of Education to collect series of interrelated data from all post-secondary Schools in the country with a view to reporting this information in ways that allows the public to make informed decisions about attending post-secondary schools.

The survey collects institution-level data in such areas as enrollments, program

Policy:

TCI's IPEDS policy is to report Operations, Financial Aids and Fiscal Operations Data through the IPEDS platform with a view to complying with the requirements of DOE in content's integrity, completeness and accuracy.

Purpose:

Is to ensure that TCI reports all data for any given fiscal year as accurately and completely as they occurred. This speaks to faithful representation of all data that TCI reports in the survey. The survey collects institution-level data in such areas as enrollments, programs, financial aids, employments, ethnicity and nationality of HR assets as well as management and audited accounts of TCI.

Procedure: The process and steps to be followed for reporting the data includes;

- The DON creates simple calendar of reports deadlines and distributes to all stakeholders for administrative reviewing and approval purposes.
- The stakeholders converge to determine internal/ TCI deadlines which are usually 4-weeks prior to IPEDS's deadlines.
- The DON opens the application portals during each reporting period to complete the survey by pulling all data from different categories as contained in our Students Information Processing Application (Diamond-D) and annual financials.
- The stakeholders converge to reviewing the draft of the survey and provide explanations where necessary and corrections as applicable before obtaining final approval from the CEO for signature and submission.
- This process is repeated for each reporting period and an electronic file and physical files are maintained for all IPEDS report for references.
- On occasion where the platform is adjusted or amended by the US DOE, the DON makes contact with IPEDS to seek clarifications before proceeding to completing the reports.
- TCI ensures reports are submitted before deadlines at all times.

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Non-Public Private Information Policy (NPPIP)

Student Records Privacy Policy

- Student records are protected by the Family Educational Rights and Privacy Act (FERPA), federal regulations which assign rights to students and responsibilities to educational institutions regarding students' education records. The Act governs the maintenance and release of information from those records.
- FERPA applies to public schools and state or local education agencies that receive Federal education funds, and it protects both paper and computerized records. In addition to the Federal laws that restrict disclosure of information from student records, most states also have privacy protection laws that reinforce FERPA. State laws can supplement FERPA, but compliance with FERPA is necessary if schools are to continue to be eligible to receive Federal education funds.
- FERPA requires schools and local education agencies to annually notify parents of their rights under FERPA. The notice must effectively inform parents with disabilities or who have a primary home language other than English. The annual notice pertaining to FERPA rights must explain that parents may inspect and review records and, if they believe the records to be inaccurate, they may seek to amend them. Parents also have the right to consent to disclosures of personally identifiable information in the record, except under authorized circumstances.
- FERPA gives both parents, custodial and noncustodial, equal access to student information unless the school has evidence of a court order or state law revoking these rights. When students reach the age of 18, or when they become students at postsecondary education institutions, they become "eligible students" and rights under FERPA transfer to them. However, parents retain access to student records of children who are their dependents for tax purposes.

Policy on Access to Student Records

Transitions Career Institute is committed to the privacy and security of our students. Transitions Career Institute Student Records Policy complies with the Family Educational Rights and Privacy Act of 1974 (FERPA) - sometimes called the Buckley Amendment - which establishes students' rights and institutions' responsibilities regarding the privacy of education records. It provides guidelines for maintaining the confidentiality of education records and monitoring the release of information from those records.

Students' Rights under FERPA

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As a current or former TCI student, The Family Educational Rights and Privacy Act (FERPA) afford you certain rights regarding your education records.

These rights are:

- ✓ The right to inspect and review your records. You may request to review your records by submitting a written request to the TCI Registrar or to the Dean, Academic Affairs.
- ✓
- ✓ The rights to seek amendment of your records which you believe are inaccurate, misleading, or otherwise in violation of your privacy rights. Requests for amendment of records must be in writing and must describe the specific portions of specific records that you wish to have amended, text or instructions as to the change desired, and the reasons why the change is justified;
- ✓
- ✓ The right to restrict the disclosure of certain Information pertaining to your records; and
- ✓
- ✓ The right to file a complaint with the Department of Education's Family Policy Compliance Office concerning alleged failures by the TCI to comply with the requirements of FERPA.

Definition of Education Records

Education records are those records directly related to a student maintained by TCI or by a party acting for and on behalf of TCI.

Under FERPA, a school must provide an eligible student with an opportunity to inspect and review his or her education records within 45 days following its receipt of a request. A school is required to provide an eligible student with copies of education records, or make other arrangements, if a failure to do so would effectively prevent the student from obtaining access to the records. A case in point would be a situation in which the student does not live within commuting distance of the school.

A school is not generally required by FERPA to provide an eligible student with access to academic calendars, course syllabi, or general notices such as announcements of specific events or extra-curricular activities. That type of information is not generally directly related to an individual student and, therefore, does not meet the definition of an education record.

Under FERPA, a school is not required to provide information that is not maintained or to create education records in response to an eligible student's request. Accordingly, a school is not required to provide an eligible student with updates on his or her progress in a course (including grade reports) or in school unless such information already exists in the form of an education record.

Transitions Career Institute

30-50 Whitestone Expressway, Suite 400, Flushing, N.Y. 11354

Phone: (718) 362-9500; Fax: (718) 362- 9508

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Release of Education Records

Except as provided in FERPA (see below) or other applicable law, TCI will not disclose personally identifiable information from your education records unless you provide a written release containing:

- What information is to be released
- To whom the information is to be released
- The purpose for which it is to be released
- Your signature and the date of the request
- Mode for which it should be released (electronic/ paper-based)

Faculty and staff are responsible for protecting the identity of students and keeping student grades confidential. Grades or evaluations linked to personal identifiers (names, Student's numbers, or Social Security Numbers) may not be publicly disclosed. Grades or evaluations may be posted only by using randomly generated codes or numbers. The return of graded papers or other assignments must also be accomplished in a manner that protects your identity.

Some records created and maintained by the TCI, although not covered by FERPA, may be subject to other federal and state laws or regulations regarding disclosure.

The exceptions under FERPA which allow the TCI to disclose personally identifiable information from your education record are stated in the full text of Transitions Career Institute Student Records Policy. The most common exceptions to disclosure restrictions are disclosures to TCI faculty or staff -- "School Officials" -- with a legitimate educational interest, or disclosure of personally identifiable information designated as ***Directory Information***.

Definition of Directory Information

Directory information includes:

- Your full name
- Mailing and permanent address(as) and telephone number(s)
- Email address
- The fact that you are or ever were enrolled
- Enrollment status (e.g., full-time, half-time or less than half-time)
- Class level and majors/minors
- Dates of attendance
- Certification/ Program enrolled for
- Cumulative credit hours

Transitions Career Institute

30-50 Whitestone Expressway, Suite 400, Flushing, N.Y. 11354

Phone: (718) 362-9500; Fax: (718) 362- 9508

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- Participation in officially recognized activities
- Your status as a graduate/ Dropped, Active, Failed etc.

Below is a quick reference of frequently asked-for data, and whether it is or is not Directory Information at Transitions Career Institute.

DIRECTORY INFORMATION?	YES	NO
Student's full name	X	
Student's ID number		X
Personal Access Control Number		X
Date of Birth		X
Gender	X	
Ethnicity		X
Mailing address and telephone number	X	
Permanent address and telephone number	X	

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30-50 Whitestone Expressway, Suite 400, Flushing, N.Y. 11354

Phone: (718) 362-9500; Fax: (718) 362- 9508

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DIRECTORY INFORMATION?	YES	NO
All addresses and telephone numbers except Mailing and Permanent (e.g. Alternate Billing Address, Contact/Emergency Address, etc.)		X
E-Mail Address	X	
Parent names and/or addresses		X
Class level and academic major/minor	X	
Dates of attendance	X	
Fact that the student is or has been enrolled	X	
Diploma awarded (LPN, RN, CNA)	X	
GPA or grades		X
Cumulative credit hours	X	

Transitions Career Institute

30-50 Whitestone Expressway, Suite 400, Flushing, N.Y. 11354

Phone: (718) 362-9500; Fax: (718) 362- 9508

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DIRECTORY INFORMATION?	YES	NO
Current term credits or class schedule (scheduled hours, attended hours, tardy)		X
Full-time, half-time or less than half-time enrollment status	X	
Information on academic standing (probation, disqualification, etc.) or whether student is eligible to return to school		X
Whether student has applied for graduation		X
Outstanding eligibility requirements for graduation		X
Accounts Receivable balance		X
Financial records of parents		X
Participation in official recognized activities	X	

Transitions Career Institute

30-50 Whitestone Expressway, Suite 400, Flushing, N.Y. 11354

Phone: (718) 362-9500; Fax: (718) 362- 9508

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DIRECTORY INFORMATION?	YES	NO
Student employment records		X
Psychiatric or psychological records		X
Copies of transcripts from other schools or colleges		X

Note: items marked as releasable will be provided to a third party upon request unless otherwise prevented through restriction filing.

Directory Information Restriction

You may choose to restrict release of your Directory Information. When the release of Directory Information is restricted, the fact that you are currently a student, or have ever been enrolled at Transitions Career Institute, will not be released.

Once you restrict the release of Directory Information, in order to conduct any business with the TCI, you will need to go in person to the office involved, with photo ID, or, via mail or fax, provided a written request for release containing the following:

- What information is to be released
- To whom the information is to be released
- The purpose for which it is to be released
- Your signature and the date signed

No information will be provided via telephone. No information will be provided to anyone - parents, relatives, friends, other students, or prospective employers - who may wish to contact you or verify your student status at TCI, without a written release from you containing the elements listed above.

Transitions Career Institute

30-50 Whitestone Expressway, Suite 400, Flushing, N.Y. 11354

Phone: (718) 362-9500; Fax: (718) 362- 9508

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Restricted Directory Information is made available only where an emergency is involved, at the direction of a court order, or to TCI staff and faculty with a legitimate educational need to know.

Submitting a Directory Restriction Request

A Restriction of Directory Information form is available in the Office of the Registrar, 30-50 Whitestone Expressway Suite 400, Flushing, NY. Complete the form, including signature and date, and return it in person. Photo identification is required.

Your request to place or remove the restriction is effective no later than two working days after it is received in the Office of the Registrar.

Note: Submission of a Directory Restriction form does not affect directory information already published or released.

Restriction Duration

The restriction of information is permanent until you request, in writing, that it be removed. The restriction will remain in place even after you have stopped attending or have graduated.

Requesting Written or Verbal References or Recommendations from Faculty or Staff

Students who request written or verbal references or recommendations from TCI faculty or staff members need to do so in writing. Such letters or statements are most effective if they contain specific information about your academic or work performance; this type of information is considered "non-directory" information and cannot be released without the signed written consent of the student, according to the Family Educational Rights and Privacy Act (FERPA) and Transitions Career Institute Student Records Policy. This information is classified by TCI as falling under the NPPI (Non-Public Private Information).

The Office of the Registrar has composed a FERPA-compliant authorization to release form that may be used when requesting references/recommendations. The completed and signed **Student Reference Request Form** may be mailed, faxed, or sent as a PDF to the faculty or staff member from whom you are requesting the reference/recommendation.

Your request should contain the following:

Transitions Career Institute

30-50 Whitestone Expressway, Suite 400, Flushing, N.Y. 11354

Phone: (718) 362-9500; Fax: (718) 362- 9508

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- What information is to be released (be as specific as possible)
- To whom the information is to be released (name, address)
- The purpose of the release of the information (application for a specific job or admission to a graduate program, for example)
- Your signature and date
- The Registrar logs and files all such requests in a secured cabinet for future references.

Requests that do not contain these four elements are not in compliance with FERPA.

Some graduate programs, scholarships or job applications require the use of their own prepared packets and may include a form which provides a place for your signature authorizing release of non-directory information. If that completed form or a copy of it always accompanies the pages to be completed by TCI faculty or staff members, no additional authorization is required.

Student Record Policy of Transitions Career Institute

The information provided on this web site is for informational purposes only. The complete text of Transitions Career Institute Student Records Policy, which takes precedence over all other published versions, is available at the TCI building at the Registrar's office and a copy may be requested at any time.

Social Security Number Disclosure Consent Statement

Students are requested to provide voluntarily their Social Security Numbers to assist TCI in developing, validating, or administering predictive tests and assessments; administering student aid programs; improving instruction; internal identification of students; collection of student debts; or comparing student educational experiences with subsequent workforce experiences. When conducting studies, TCI will disclose a Social Security Number only in a manner that does not permit personal identification of a student by individuals other than representatives of TCI and only if the information is destroyed when no longer needed for the purposes for which the study was conducted. By providing their Social Security Number, students are consenting to the uses identified above. Provision of the student's Social Security Number and consent to its use is not required and, if a student chooses not to do so, he/she will not be denied any right, benefit, or privilege provided by law. A student may revoke consent for the use of his/her Social Security Number at any time by contacting the Office of the Registrar.

Transitions Career Institute

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www.tcilpn.org

Student Records Privacy Policy for Faculty & Staff

TCI, in compliance with the Family Educational Rights and Privacy Act (FERPA), is responsible for monitoring access to and release of information from student education records. Staff and faculty with access to student education records are legally responsible for protecting the privacy of the student by using information only for legitimate educational reasons to instruct, advice, or otherwise assist students. FERPA also assures certain rights to students at TCI regarding their education records. These rights do not transfer to parents, guardians, spouses or other family members without the specific written permission of the student. (Please see the "Student" section of the Privacy Policy for more information).

Responsibility for Security and Confidentiality of Records and Files

Security and confidentiality are matters of concern to all TCI employees and to all other persons who have access to education records. The purpose of this code is to clarify responsibilities in these areas. Each individual who has access to confidential information is expected to adhere to the regulations stated below. A person who has access to education records may not:

- ❖ Reveal the content of any record or report to anyone, except in the conduct of his or her work assignments and in accordance with TCI policies and procedures.
- ❖ Make or allow any unauthorized use of information.
- ❖ Knowingly include false, inaccurate or misleading entry in any report or record.
- ❖ Knowingly expunge a data record or a data entry form and record, report or file.
- ❖ Share individual passwords with any other person (for password protected data).
- ❖ Seek personal benefit or allow others to benefit personally from the knowledge of any confidential information they have acquired through work assignments.
- ❖ Remove any official record or report, or copy of any official report, from the office where it is maintained, except in the performance of official duties.

Any knowledge of a violation of this code must be reported immediately to the violator's supervisor. Violations may lead to disciplinary action, including dismissal. Violations can also lead to action under the State of New York statutes pertaining to theft, alteration of public records, or other applicable sections.

Transitions Career Institute

30-50 Whitestone Expressway, Suite 400, Flushing, N.Y. 11354

Phone: (718) 362-9500; Fax: (718) 362- 9508

www.tcilpn.org

Parent Rights

Once a student has reached age 18 or is attending TCI, all FERPA rights belong to the student. Parent access to education records is limited to information classified as Directory Information under TCI Records Policy.

Parental access to other education records is allowed when the student provides TCI with a signed and dated release specifying the records to be disclosed, stating to whom they should be disclosed and the purpose of the disclosure. Each instance of release of non-Directory Information requires its own separate and specific written authorization to release.





Parents are encouraged to read the Privacy Policy information provided for students, located in the first section on this page.

Family Emergency Situations

During the hours from 8:00 - 22:00 class/ work week (Mondays through Thursdays) and, from 9:00 - 15:00 / work week (Fridays only) if a parent, guardian, or other family member needs assistance in contacting a TCI student in an emergency, they should contact the student's Office (718) 362-9500. Staff members in those offices have systems in place and work closely with the Department of Public Safety to help families connect with their students in emergency circumstances. For emergencies after 5:00 PM (or if parents or families are unable to connect with a staff member), the Department of Public Safety for the State of New York would be a best option.

Public Health or Safety Emergencies

Disclosure of information from education records is allowed under TCI Student Records Policy and FERPA in connection with a health or safety emergency if the information is necessary to protect the health or safety of the student or others. TCI exclusively determines whether disclosure of information is necessary by considering;

-  The seriousness of the threat to health or safety;
-  The need for the information to meet the emergency;
-  Whether the individual(s) to whom the information is released is in a position to deal with the situation; and
-  The extent to which time is of the essence.

Transitions Career Institute

30-50 Whitestone Expressway, Suite 400, Flushing, N.Y. 11354

Phone: (718) 362-9500; Fax: (718) 362- 9508

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The Family Educational Rights and Privacy Act (FERPA)

FERPA was enacted by the U.S. Congress in 1974 and has since had many amendments. Responsibility for oversight of FERPA compliance rests with the Department of Education's Family Policy Compliance Office.

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Phone: (718) 362-9500; Fax: (718) 362- 9508

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Voter Registration Information

Policy:

TCI shall provide voters registration information to all students both in paper form (via display of details of voters' registration information) and electronically in her premises.

Purpose:

is to ensure that TCI complies with federal laws with respect to adequate Consumer Information being provided to students and other stakeholders as TCI participates in the Federal Student Aid programs

Procedure:

- As part of the requirement for our institution to participate in the Federal Student Aid programs, we are required by federal law to provide each student with the state's voter registration form in paper or by an electronic method.
- In order to register to vote, please visit www.eac.gov/voter_resources/contact_student's_state.aspx.
- Find and select student's state Consumer Information Guide to view eligibility requirements, registration deadlines, and a link to visit student's state election department web page and obtain student's state's voter registration form.
- Student may contact the Financial Aid Office if student have any questions.
- Every eligible TCI student is encouraged to exercise his or her right to vote in national, state, and local elections.
- If student want student's voice to be heard, let it speak through the ballot box. The following information is provided to help and encourage student to vote.

VOTER REGISTRATION Deadline:

- Student's properly completed voter registration form must be postmarked or received by the 21st day before the election in which student wish to vote.
- However, if the voter registration deadline falls on a day when offices of the Secretary of State and county board of elections are closed, the deadline is extended to the succeeding business day when the office is open.

REGISTER TO VOTE!

- To register in New York student must be:
 - A United States citizen
 - At least 18 years old by the next election
 - A resident of the county for 30 days before the election

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- Student are NOT currently serving a sentence, probation or parole because of a felony conviction.
- The registrant must complete a Voter Registration Application and/or Party Affiliation Form.
- Mail or deliver the Voter Registration Application and/or Party Affiliation Form to the County Commissioner of Registration or Superintendent of Elections for student's county.
- The registration deadline to vote at the next election is 21 days prior to Election Day.
- When: Information available continuously
- How: Information is available in TCI's library and on our Orbund system. Voter information will also be distributed to new students during the required orientation sessions at the start of each new class.

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Default Management Policy

Default Management is predicated on a thorough understanding of the circumstances involved in default cases and which is the primary ingredient in developing an effective default management policy. Through this understanding students are put on a path toward meeting their financial obligation(s) and also places TCI in a better fiscal management position for future students.

The vast majority of students who receive loans will not need extraordinary assistance to reduce default risk. In some cases, however, certain students will need certain and specific assistance.

Policy:

TCI's policy is to establish interventions which assist the borrower/ students to have a stronger relationship with the loan servicer. This end is achieved through supplemental entrance and/or exit counseling, financial literacy education, and the collection of supplemental contact information.

Purpose:

Is to ensure healthy fiscal operations while ensuring that students are properly guided to manage their financial commitments to the borrower(s) as they complete their program.

Procedure:

- Understanding who is defaulting, and why, is key to developing effective default prevention strategies. Once we understand the 'who' and the 'why' of default risk TCI, we are better positioned to assist our students.
- This information will enable you to contact delinquent borrowers either early or late in their delinquency.
- These interventions will be accomplished by the financial aid office and are seen as traditional strategies.
- Interventions which assist the borrower to achieve greater academic success, program completion and post-graduation employment.
- TCI leverages on strategies which improve student success for those that are at risk of dropping out prior to program completion.
- Director of Financial Aid also works with the DON and Registrar to identify students where data shows limited student success and later default on one or more loans.
- Targeted intervention can occur at any point within the enrollment and/or repayment cycle.
- The interventions that TCI undertake are generally related to the results of our internal data analysis. Some of these could be;
 - Students who are currently enrolled:
 - Students who are on academic probation, or students who are enrolled in a program which produces a disproportionate number of defaulters.

Transitions Career Institute

30-50 Whitestone Expressway, Suite 400, Flushing, N.Y. 11354

Phone: (718) 362-9500; Fax: (718) 362- 9508

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- In this case, TCI interventions might take the form of traditional strategies (extra loan counseling, literacy education, and collecting additional contact information); or providing additional student success support (tutoring, personal counseling, meetings with academic advisors or student support services).
- Students who have entered the grace period:
 - Traditional interventions with at risk students during the grace period might include validating contact information, providing employment counseling for those who dropped out, and assisting a borrower to make personal contact with the loan servicing entity.
 - A student success intervention might take the form of reenrollment counseling.
- Students in repayment:
 - Interventions are more likely to be traditional at this stage and might include outreach early in delinquency to those students who did not complete an academic program, or where enrolled in an academic program producing a disproportionate number of defaulters, and outreach late in delinquency, at or more than 90 days' delinquent on a loan repayment, with whom the servicer has not succeeded in placing in an appropriate repayment status (repayment, deferment, forbearance).
- In all of these cases, TCI's analysis of defaulters will have enabled us to identify which borrowers are likely to be at greatest risk of loan default.
- TCI knowledge of the enrollment and repayment cycle will help us to determine when we are most likely to successfully intervene with the borrower to reduce default risk through either traditional or student success strategies.
- Our targeted interventions will enable us to create and carry out these interventions in a cost effective manner, reaching out with additional assistance to those who are most in need.

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Professional Judgement Policy

Students may submit documentation for professional judgment based on changes to financial income, such as involuntary loss of employment by the student or a spouse or, based on additional cost of attendance, such as child care, study abroad or computer expenses.

Policy:

TCI's policy provides a consistent approach to the Financial Aid Director on the inherent issues to look out for when students present a change in their circumstances, how to review and verify the circumstance and present a basis for judgement in the re-processing of students FAFSA applications.

Purpose:

Is to ensure uniformity and consistency in required documentation and proofs across the student population.

Procedure:

- Professional judgments are reviewed by the Financial Aid Officer.
- Professional judgment requests to funding program fees would increase maximum Unsubsidized Loan, PLUS or private loan eligibility.
- Professional judgment requests may result in no change in aid eligibility.
- Professional judgment decisions are noted in Orbund and availed to the student.
- Documentation for Professional judgments decisions are placed in the student's financial aid student file.
- A revision email would be sent to the student if applicable, directing the student to view the information for completeness and accuracy.
- The professional judgment process is as follows:
 - Request for professional judgment is communicated to the Financial Aid office.
 - Professional judgment form is availed to the student requesting additional information and documentation required.
 - Professional judgment request is reviewed by student's Financial Aid Office.
 - Any applicable changes to FAFSA, cost of attendance, and/or financial aid award are made by the Office.
 - The student is informed of the result of the appeal/ adjustment to ISIR

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90/10 Policy

The 90/10 rule requires for-profit colleges to get no more than 90% of their revenues from Title IV Federal Student Aid Programs. This effectively means that at least, 10% of revenues for institutions participating in Title IV programs **MUST** be cash-based.

Legislative History

The restrictions on revenue percentages at for-profit colleges were initially introduced in 1992 as the 85/15 rule and subsequently modified into the 90/10 rule in 1998.

- The Higher Education Amendments of 1992 (PL 102-325, 7/23/1992) amended subsection 481(b) of the Higher Education Act of 1965 [20 USC 1088(b)] to introduce the 85/15 rule effective October 1, 1992. The legislation added paragraph (6): "which has at least 15 percent of its revenues from sources that are not derived from funds provided under this title, as determined in accordance with regulations prescribed by the Secretary".
- The Higher Education Amendments of 1998 (PL 105-244, 10/7/1998) moved the language defining the 85/15 rule to section 102(b)(1)(F) of the Higher Education Act of 1965 [20 USC 1002(b)(1)(F)] and substituted "10 percent" for "15 percent" and "Title IV" for "this title", effective October 1, 1998.
- The Higher Education Opportunity Act of 2008 (PL 110-315, 8/14/2008) moved the language to section 487(a)(24) of the Higher Education Act of 1965 [20 USC 1094(a)(24)] and replaced the regulations for calculating the percentage of revenues with a statutory encoding in a new section 487(d), effective upon enactment on August 14, 2008. It also clarified the reference to "Title IV" for technical reasons.

The current language for the 90/10 rule appears in section 487(a) of the Higher Education Act of 1965 [20 USC 1094(a) (24)]:

In the case of a proprietary institution of higher education (as defined in section 1002(b) of this title), such institution will derive not less than ten percent of such institution's revenues from sources other than funds provided under this subchapter and part C of subchapter I of chapter 34 of title 42, as calculated in accordance with subsection (d)(1), or will be subject to the sanctions described in subsection (d)(2).

The formula for calculating the revenue percentages is specified in 20 USC 1094(d)(1):

- d. Implementation of non-title IV revenue requirement
 1. Calculation

In making calculations under subsection (a) (24), a proprietary institution of higher education shall —

Transitions Career Institute

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Phone: (718) 362-9500; Fax: (718) 362- 9508

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use the cash basis of accounting, except in the case of loans described in subparagraph (D)(i) that are made by the proprietary institution of higher education;

- A. consider as revenue only those funds generated by the institution from —
 - i. tuition, fees, and other institutional charges for students enrolled in programs eligible for assistance under this subchapter and part C of subchapter I of chapter 34 of title 42;
 - ii. activities conducted by the institution that are necessary for the education and training of the institution's students, if such activities are —
 - I. conducted on campus or at a facility under the control of the institution;
 - II. performed under the supervision of a member of the institution's faculty; and
 - III. required to be performed by all students in a specific educational program at the institution; and
 - iii. funds paid by a student, or on behalf of a student by a party other than the institution, for an education or training program that is not eligible for funds under this subchapter and part C of subchapter I of chapter 34 of title 42, if the program —
 - I. is approved or licensed by the appropriate State agency;
 - II. is accredited by an accrediting agency recognized by the Secretary; or
 - III. provides an industry-recognized credential or certification;
- B. presume that any funds for a program under this subchapter and part C of subchapter I of chapter 34 of title 42 that are disbursed or delivered to or on behalf of a student will be used to pay the student's tuition, fees, or other institutional charges, regardless of whether the institution credits those funds to the student's account or pays those funds directly to the student, except to the extent that the student's tuition, fees, or other institutional charges are satisfied by —
 - i. grant funds provided by non-Federal public agencies or private sources independent of the institution;
 - ii. funds provided under a contractual arrangement with a Federal, State, or local government agency for the purpose of providing job training to low-income individuals who are in need of that training;
 - iii. funds used by a student from savings plans for educational expenses established by or on behalf of the student and which qualify for special tax treatment under title 26; or
 - iv. institutional scholarships described in subparagraph (D)(iii);
- C. include institutional aid as revenue to the school only as follows:

Transitions Career Institute

30-50 Whitestone Expressway, Suite 400, Flushing, N.Y. 11354

Phone: (718) 362-9500; Fax: (718) 362- 9508

www.tcilpn.org

- i. in the case of loans made by a proprietary institution of higher education on or after July 1, 2008 and prior to July 1, 2012, the net present value of such loans made by the institution during the applicable institutional fiscal year accounted for on an accrual basis and estimated in accordance with generally accepted accounting principles and related standards and guidance, if the loans —
 - I. are bona fide as evidenced by enforceable promissory notes;
 - II. are issued at intervals related to the institution's enrollment periods; and
 - III. are subject to regular loan repayments and collections;
 - ii. in the case of loans made by a proprietary institution of higher education on or after July 1, 2012, only the amount of loan repayments received during the applicable institutional fiscal year, excluding repayments on loans made and accounted for as specified in clause (i); and
 - iii. in the case of scholarships provided by a proprietary institution of higher education, only those scholarships provided by the institution in the form of monetary aid or tuition discounts based upon the academic achievements or financial need of students, disbursed during each fiscal year from an established restricted account, and only to the extent that funds in that account represent designated funds from an outside source or from income earned on those funds;
- D. in the case of each student who receives a loan on or after July 1, 2008, and prior to July 1, 2011, that is authorized under section 1078-8 of this title or that is a Federal Direct Unsubsidized Stafford Loan, treat as revenue received by the institution from sources other than funds received under this subchapter and part C of subchapter I of chapter 34 of title 42, the amount by which the disbursement of such loan received by the institution exceeds the limit on such loan in effect on the day before May 7, 2008; and
- E. exclude from revenues-
- i. the amount of funds the institution received under part C of subchapter I of chapter 34 of title 42, unless the institution used those funds to pay a student's institutional charges;
 - ii. the amount of funds the institution received under subpart 4 of part A;
 - iii. the amount of funds provided by the institution as matching funds for a program under this subchapter and part C of subchapter I of chapter 34 of title 42;

Transitions Career Institute

30-50 Whitestone Expressway, Suite 400, Flushing, N.Y. 11354

Phone: (718) 362-9500; Fax: (718) 362- 9508

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- iv. the amount of funds provided by the institution for a program under this subchapter and part C of subchapter I of chapter 34 of title 42 that are required to be refunded or returned; and
- v. the amount charged for books, supplies, and equipment, unless the institution includes that amount as tuition, fees, or other institutional charges.

Arguments For and Against the 90/10 Rule

Proponents of the 90/10 rule argue that the rule ensures that students have "skin in the game" by requiring them to pay for part of the costs of their education at a for-profit college. They characterize the 90/10 rule as preventing low-quality schools from obtaining federal student aid.

Opponents of the 90/10 rule argue that the students at for-profit colleges are predominantly low-income students without the financial resources to cover 10% of the costs on their own. They also argue that the 90/10 rule forces for-profit colleges that are close to the 90% threshold to raise tuition whenever Congress increases federal student aid funding. The opponents to the 90/10 rule argue that the rule does not correlate well with quality of the education. They also argue that most community colleges would not pass the 90/10 rule if they were subjected to the rule and state grants and appropriations were counted alongside federal student aid.

A US Government Accountability Office report, *For-Profit Schools: Large Schools and Schools that Specialize in Healthcare Are More Likely to Rely Heavily on Federal Student Aid* (GAO-11-4, October 4, 2010), addressed the 90/10 rule, finding no relationship between a college's tuition rate and the likelihood of having a high 90/10 revenue percentage. Colleges with low tuition rates did not have much higher 90/10 revenue percentages. The GAO report did not evaluate correlations between the magnitude of changes in a college's tuition rates, changes in federal student aid funding per student and 90/10 revenue percentages. The GAO report did find that colleges with a high proportion of low-income students (Pell Grant recipients) tended to have higher 90/10 revenue percentages.

Current Issues

Some proponents of the 90/10 rule have proposed a variety of changes to the rule, including a return to the 85/15 rule and the inclusion of military student aid (GI Bill and Tuition Assistance funds) within the scope of the rule. Opponents have been lobbying for a repeal of the 90/10 rule.

Policy:

It is in the light of the above that TCI recruitment & retention policy ensures that adequate entrance counselling is provided to all her students (potential & current) of their commitment to funding their cost of attendance at our school. FAFSA is processed in full for all qualifying students and

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options are given to them to personally fund part of, or all their fees (if they are capable) either through cash or other non-Title-IV funding (such as Sallie Mae & private lenders) without being unmindful of raking up debt that are not only interest-free, but could be a financial burden after their graduation.

Purpose:

Is to ensure compliance with the provisions of the Act

Procedure:

- The 90/10 Formula FSA program funds (except LEAP or FWS) used for tuition, fees and other institutional charges to students
- The sum of revenues generated by the school from:
 - (1) tuition, fees and other institutional charges for student enrolled in eligible training programs, plus
 - (2) School activities that are necessary for the education or training of students enrolled in those eligible programs (to the extent not included in tuition, fees and other institutional charges).

Title IV Revenue Adjustments

- Exclude from revenue:
 - FWS funds paid directly to student, unless credited to student account
 - LEAP, SLEAP, and GAP funds received from a state
 - Campus-Based matching funds
 - Amount charged for books, supplies, and equipment, unless included in tuition, fees, or other charges
 - Returned Title IV funds
 - Administrative Cost Allowance
 - Title IV credit balances
 - Revenue from Programs and Activities
 - Tuition,
 - fees and,
 - other institutional charges for students enrolled in eligible programs
 - Activities conducted by institution necessary for education and training if
 - – Conducted on campus or faculty under school control –
 - Performed under supervision of a member of the school's faculty –
 - Required to be performed by all students in a specific program at the institution

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Revenue from Non-Title IV Eligible Programs

- Count revenue if program:
 - Approved by State agency
 - Accredited by recognized agency
 - Provides industry-recognized credential
 - Provides training needed to maintain State licensing requirements, or
 - Provides training for additional licensing requirements

90/10 Presumption Rule

- TCI must presume that any Title IV program funds disbursed to the school, or delivers to or on behalf of a student will be used to pay the student's tuition, fees, or institutional charges regardless of whether the school credits the funds to the student's account or pays the funds directly to the student

Application of Title IV Funds

- The following program funds reduce student tuition, fees and necessary activity charges before Title IV funds are applied: –
 - Grant funds from non-Federal public agencies or private sources
 - Funds from contracts to provide training to low-income individuals
 - Funds from savings plans that qualify for special tax treatment

Student Title IV Revenue

- Subsidized loans
- Unsubsidized loans up to loan limits
- Federal Pell Grants
- FSEOG (subject to matching reduction)
- FWS applied to tuition and fees (subject to matching reduction)
- (Total) Student Title IV revenue
- (Subtract) Revenue Adjustment
- (Total) Adjusted Student Title IV Revenue

Adjusted Student Title IV Revenue

- The amount of FSEOG and FWS funds credited to student accounts are reduced by the amount of the institutional matching
 - If Funds Applied First plus Title IV Revenue exceeds Tuition and Fees,
 - Title IV Revenue is reduced by excess

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- R2T4 refunds reduce Title IV Revenue
- Unsubsidized loans over the limit and student payments count as Student Non-Title IV revenue only for the amount needed to cover Tuition and Fees that are not paid by Funds Applied First and Student Title IV revenue
- Grant funds for the student from non-federal public agencies or independent private sources
- Funds for the student under contractual agreement with government agency for job training to low-income individuals
- Funds from savings plans that qualify for special tax treatment
- Institutional scholarships to the student
- Amount of unsubsidized loans over loan limits
- Student payments

Revenue from Other Sources

- Activities conducted by the TCI that are necessary for education and training
- Funds paid for education and training in qualified non-Title IV eligible programs
- NPV of institutional loans disbursed to students

Violation Report

- If a school fails to meet the 90/10 requirement,
 - it must report the failure to the Department no later than 45 days after the end of its fiscal year
 - The address for reporting the violation is found in the 2010-11 FSA Handbook, page 2-55 26 U.S. Department of Education Sanctions
 - If school fails 90/10 for any fiscal year:
 - It becomes provisionally certified for the two fiscal years following the fiscal year it failed
 - Provisional certification ends on date existing PPA scheduled to expire, or school loses eligibility for second connective 90/10 violation
 - If school fails 90/10 for two connective fiscal years, it loses eligibility to participate for at least two fiscal years
 - To regain eligibility, school must meet state licensing, accreditation, and financial responsibility requirements for at least two fiscal years after the fiscal year it became ineligible 28
 - Improper Treatments • Restricting access to DL funds •
 - School must also desist from unequal charges to students account
 - Including Administrative Cost Allowance
 - Including revenue from non-institutional charges

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