



TRANSITIONS *CAREER INSTITUTE*
SCHOOL OF NURSING

2025-2026

Financial Aid

Policies and Procedures Manual

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Introduction to the Financial Aid Office

The Financial Aid Office at **Transitions Career Institute (TCI)** is committed to assisting students and their families in understanding and accessing financial aid resources. Our office operates in full compliance with federal, state, and institutional regulations to ensure that aid is administered fairly, efficiently, and transparently. This section of the *Policies and Procedures Manual* is intended for use by internal staff, appeals committees, auditors, and other stakeholders who may need to reference or review the college's financial aid policies and practices. Our mission is to provide accurate, student-centered financial aid services and to support our students in achieving their academic and professional goals.

Office Location

Transitions Career Institute

133-11 20th Avenue
College Point, NY 11356

Hours of Operation

Business Hours:

Monday – Friday: 8:30 AM – 4:30 PM
Evening Sessions: 5:30 PM – 10:00 PM

Secretaries and Attendance Staff Available:

Monday – Thursday: 8:30 AM – 5:00 PM
Friday: 9:00 AM – 3:00 PM

Contact Information

Phone: (718) 362-9500 or (929) 400-0984

Fax: (718) 362-9508

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Public Website

www.tcilpn.com

Financial Aid Office Overview and Philosophy

Institutional Mission Statement

The mission of **Transitions Career Institute (TCI)** is to provide a high-quality, accessible vocational training program. The institute is committed to increasing the nursing workforce by meeting the educational needs of our students in addition to the holistic needs of the client population. Transitions Career Institute provides opportunities for individuals to learn and develop healthcare skills that will allow them to become valued members of the medical profession.

We strive to assist our students in conquering educational challenges, enabling them to become compassionate and professional members of the healthcare continuum while meeting the needs of people in healthcare facilities and the broader community. Completion of the program of study leads to a **Certificate in Practical Nursing**, and program graduates are eligible to sit for the **State Board Licensing Examination**.

Operative Financial Aid Principles

The Financial Aid Office is guided by the following core principles:

- **Equity and Access:** We work to ensure that financial aid is accessible to all eligible students, regardless of background, and that funds are awarded fairly and consistently.
 - **Compliance and Integrity:** We adhere strictly to all federal, state, and institutional policies and regulations, maintaining transparency and ethical standards in every process.
 - **Student Success:** We support the overall success of our students by providing financial guidance, education, and support throughout the aid process.
 - **Responsiveness and Accountability:** We aim to provide accurate, timely information and to manage funds responsibly in the best interest of students and the institution.
-

Brief History of the Financial Aid Operation

Since its inception, Transitions Career Institute has recognized that access to financial aid is critical to enabling students to pursue and complete their education. The Financial Aid Office was established to administer federal and institutional aid programs, helping students manage the cost of education and remain enrolled through to graduation. Over

time, the office has expanded in scope and capability, implementing systems and training to remain compliant with Department of Education requirements and to support a growing student population.

Philosophy of the Financial Aid Office

The Financial Aid Office believes that no student should be denied the opportunity to pursue a nursing career due to financial hardship. Our team is committed to helping students access the resources they need through transparent, compliant, and student-focused financial aid services. We view financial aid as a tool that empowers students, supports equity, and contributes directly to student retention and success.

Alignment with Institutional Mission

The philosophy and operations of the Financial Aid Office are closely aligned with the mission of Transitions Career Institute. By facilitating access to financial resources and minimizing financial barriers, the Financial Aid Office helps students overcome one of the key challenges to educational attainment. This support allows TCI to fulfill its mission of preparing students to become compassionate, skilled members of the healthcare field. Our commitment to access, compliance, and student success directly contributes to increasing the nursing workforce and improving healthcare outcomes in the community.

Fiscal Office Responsibilities

POLICY:

To ensure Transitions Career Institute coordinates and manages the Fiscal Office in ways that reflect compliance with U.S. Department of Education standards in the areas of budgeting for financial aid, receiving and disbursing financial aid to qualifying students, and refunding unearned funds to the U.S. Department of Education.

PURPOSE:

To ensure that TCI coordinates and manages financial aid and other revenue sources with efficiency and effectiveness in the areas of budgeting, receipt, allocation, disbursement, and refund of financial aid. This includes ensuring that cash management, accounting

information systems, and financial reporting conform with U.S. Department of Education regulations and 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.
 - 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

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.

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.

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. 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.
8. Maintain Satisfactory Academic Progress in your degree or certificate program to continue receiving funds. See the Title IV Satisfactory Academic Progress Policy.
9. Not be in default on any prior educational loans.
10. Not have borrowed in excess of Federal aggregate loan limits.

Determination of Financial Need

Aid Amount: Who Decides and How

If a student meets the basic eligibility criteria for federal student aid, the **Financial Aid Office at Transitions Career Institute (TCI)** is responsible for determining how much aid that student is eligible to receive.

Eligibility for aid depends on several factors, including:

- The **Student Aid Index (SAI)**
- The student's **year in school**
- **Enrollment status** (e.g., full-time, half-time)
- The **Cost of Attendance (COA)** at TCI

How Aid Is Calculated:

The financial aid staff at TCI follows a structured process based on federal guidelines:

1. **Determine the Cost of Attendance (COA)** for the academic year or program period.
2. **Review the Student Aid Index (SAI)** from the student's completed FAFSA form.
3. **Calculate Financial Need** using the formula:

Cost of Attendance (COA) – Student Aid Index (SAI) = Financial Need

This calculation helps determine the maximum amount of **need-based aid** the student may receive.

To determine the amount of **non-need-based aid**, the school subtracts any financial aid already awarded from the total COA:

Cost of Attendance (COA) – All Financial Aid Received = Remaining Eligibility for Non-Need-Based Aid

Cost of Attendance (COA):

The COA is the estimated total cost for a student to attend TCI. This includes direct and indirect costs such as:

- **Tuition and fees**
- **Food and housing** (or a living expense allowance if housing is not contracted through the school)
- **Books and supplies**
- **Transportation**
- **Loan fees**
- **Personal or miscellaneous expenses** (including an allowance for a personal computer, if applicable)
- **Child or dependent care expenses**
- **Costs related to a disability**
- **Reasonable expenses for approved study abroad programs**

COA is determined for each academic year or length of the program (e.g., 12 months or 18 months for certificate programs) and varies based on enrollment status and housing situation.

Student Aid Index (SAI):

The **SAI** is a numerical index calculated from the data submitted on the FAFSA and is used by the Financial Aid Office to assess a student's eligibility for federal aid. It is **not** a reflection of the student's financial aid award amount or what the student or their family is expected to pay.

Key notes about the SAI:

- It may be **negative (down to -1500)** to reflect high financial need.
 - It is derived largely from **IRS-transferred tax data**, though some applicants may manually input tax information.
 - The **Federal Student Aid Estimator** can be used to approximate a student's SAI before submitting the FAFSA.
-

Need-Based Aid:

A student may be eligible for **need-based aid** if their SAI is less than their COA. The following federal programs are classified as need-based:

- **Federal Pell Grant**
- **Direct Subsidized Loans**

A student **cannot receive more need-based aid than their calculated financial need.**

Example:

- COA = \$16,000
- SAI = \$12,000
- **Financial Need = \$4,000**

In this case, the student may be awarded **up to \$4,000** in need-based aid.

Non-Need-Based Aid:

Non-need-based aid refers to financial aid that is **not based on the Student Aid Index (SAI)**. Instead, it depends on the **Cost of Attendance (COA)** and the amount of **other aid already awarded**, regardless of need.

Formula for Non-Need-Based Aid:

Cost of Attendance (COA) – Financial Aid Awarded So Far = Eligibility for Non-Need-Based Aid

This total includes all previously awarded aid such as:

- Federal grants
- State grants
- Institutional aid
- Private scholarships
- Any other aid from outside sources

Example:

- COA = \$16,000
- Total Aid Already Awarded (e.g., Pell Grant, FSEOG, private scholarships) = \$4,000
- Remaining eligibility for non-need-based aid = **\$12,000**

The following federal aid program is considered **non-need-based**:

- **Direct Unsubsidized Loan**

Non-need-based aid can be awarded up to the student's remaining COA after all other aid is considered, regardless of family income.

Special Conditions

Professional Judgment (PJ) – 2025–2026 Award Year

Definition and Authority

Under Section 479A of the Higher Education Act, as amended, the financial aid administrator at **Transitions Career Institute (TCI)** has the authority to exercise **Professional Judgment (PJ)** to make case-by-case adjustments to a student's FAFSA data or financial aid eligibility based on **special or unusual circumstances**. These decisions are **final** and **cannot be appealed** to the U.S. Department of Education.

Professional Judgment allows the institution to ensure that federal aid eligibility reflects a student's **actual financial and personal situation**, especially when the FAFSA data does not accurately represent the student's or family's current ability to pay.

Types of Professional Judgment Adjustments:

1. Special Circumstances

These refer to financial situations that **affect the student's or family's income or assets**, and may include, but are not limited to:

- Loss or significant reduction of income (due to job loss, reduction in work hours, illness, etc.)
- Death of a parent or spouse
- Divorce or separation after FAFSA submission
- Unusual medical or dental expenses not covered by insurance
- One-time income events (e.g., early IRA withdrawal for hardship)
- High child care or dependent care costs

When special circumstances are documented and approved, the Financial Aid Office may update specific FAFSA data elements (e.g., Adjusted Gross Income, income earned, taxes paid, etc.) to **recalculate the Student Aid Index (SAI)**.

2. Unusual Circumstances

These refer to conditions that **affect a student's dependency status**, and may include:

- Parental abandonment or estrangement
- Parental incarceration
- Human trafficking or refugee/asylee status
- Abuse, neglect, or unsafe living conditions

In cases of unusual circumstances, a student may be granted **independent status**, even if they do not meet the standard FAFSA criteria. The school must collect documentation to

support the decision and **must not require parental information** on the FAFSA once independent status is approved.

Hybrid Circumstances

If a student experiences **both** special and unusual circumstances, the financial aid office is permitted to evaluate **each circumstance independently** and apply both sets of adjustments if warranted.

Documentation Requirements

All Professional Judgment decisions must be **well-documented** in the student's financial aid file. Required documentation may include:

- IRS tax transcripts or W-2s
- Signed statements from the student or relevant parties
- Legal documents (e.g., divorce decrees, death certificates)
- Medical bills or insurance statements
- Letters from social workers, clergy, or school counselors
- Court orders or government agency records

The documentation must support both the **reason for the adjustment** and the **method of recalculating aid**.

Processing and Communication:

- Students requesting consideration under PJ must **submit a written request** to the Financial Aid Office and provide **all required supporting documentation**.
- The Financial Aid Administrator will review the request and determine whether an adjustment is justified.
- If approved, adjustments are made in the financial aid management system and documented accordingly.
- The student is notified in writing of the outcome.

FAFSA Simplification and PJ Requirements (Effective 2024–25 and Beyond):

Under the **FAFSA Simplification Act**, effective for the 2025–2026 award year:

- Institutions are **required to publicly post** that Professional Judgment is available and explain the process for requesting it.
- Students must be informed **early and clearly** that they may pursue a PJ review if their situation warrants it.
- Schools are **prohibited** from maintaining a blanket policy that denies all PJ requests of a certain type (e.g., automatically rejecting unemployment-related income loss cases).
- **Documentation waivers** may be allowed for certain populations (e.g., unaccompanied homeless youth, foster youth) based on prior determinations.

Policy Statement:

POLICY:

Transitions Career Institute acknowledges its responsibility to consider special or unusual circumstances that may affect a student's federal financial aid eligibility. The Financial Aid Office will apply Professional Judgment, when appropriate, to ensure equitable and accurate aid determinations based on individual student circumstances.

AWARDS & PACKAGING Policy

TCI 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 ensure that students are not awarded until verification is complete and all missing documents are resolved. In addition, TCI ensures that our process considers Parent 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.
- 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.

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.

Over Awards & Overpayments

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 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 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 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.
- 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.

Ordering IRS Transcripts Policy

Purpose:

To establish a clear institutional policy for when and how IRS tax return transcripts must be requested to verify federal tax information submitted via the FAFSA, in compliance with U.S. Department of Education regulations.

Background and Context

Beginning with the 2024–2025 award year and continuing into 2025–2026, the **IRS Data Retrieval Tool (DRT)** has been **replaced by the Direct Data Exchange (DDX)**. Under this system, **all FAFSA contributors (student, spouse, parent(s)) are required to provide consent** for their federal tax information (FTI) to be transferred directly from the IRS via DDX.

If all contributors provide consent and DDX data is successfully retrieved, **no tax transcript is required**.

However, in certain cases—such as failed DDX transfers, amended returns, non-filer verifications, or unusual circumstances, **IRS tax transcripts or alternative documentation may still be required** to complete verification or exercise Professional Judgment.

Policy Statement

If federal tax information (FTI) cannot be securely transferred via the Direct Data Exchange (DDX) system, the Financial Aid Office at Transitions Career Institute may request **IRS tax documentation** from the student and/or other contributors.

Acceptable IRS Tax Documentation

Depending on the situation, the following documents may be accepted to verify income and tax data:

- **IRS Tax Return Transcript** (preferred)

- **Signed copy of IRS Form 1040 and applicable schedules**
 - **IRS Verification of Non-filing Letter** (for non-filers)
 - **IRS Record of Account Transcript**, if required
 - **W-2s or 1099s**, if applicable for untaxed income or earnings
-

When to Request an IRS Transcript

A student or contributor may be required to order an IRS tax transcript if:

- They **did not provide consent** for DDX on the FAFSA.
 - Their tax data was **not successfully retrieved** via DDX.
 - The school has a **conflicting information** case that requires IRS verification.
 - They **amended their tax return** (1040X).
 - They filed **foreign or Puerto Rican returns**.
 - The Financial Aid Office is exercising **Professional Judgment** and needs to confirm updated income information.
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How to Order an IRS Tax Transcript

Students or parents may request transcripts **free of charge** through one of the following methods:

Online

Visit: <https://www.irs.gov/individuals/get-transcript>

Choose **“Get Transcript Online”** (must register for IRS account)

Or select **“Get Transcript by Mail”** for delivery within 5–10 business days

By Phone

Call the IRS at **1-800-908-9946** and follow the prompts to request a **Tax Return Transcript**.

By Mail (Form 4506-T)

Complete **IRS Form 4506-T** and mail or fax it to the address listed on the form. Specify the tax year and transcript type.

Documentation Handling

- All submitted tax documents must be **legible and unaltered**.
 - Documents must be **securely stored** and maintained in the student's financial aid file.
 - All personally identifiable information (PII) must be protected in compliance with FERPA and federal data security guidelines.
-

Review and Oversight

The **Director of Financial Aid** is responsible for:

- Determining when tax transcripts are necessary
- Ensuring timely and accurate documentation collection
- Maintaining compliance with federal verification requirements

The policy will be reviewed **annually** and updated as needed based on changes to federal guidance or institutional procedures.

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 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, 200, 200)
- 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.
- 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 must complete three steps in order to receive direct loans funds. These include accepting the loan, 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 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 the projected date. Once a student does finalize all steps during the program, direct loan funds will generally be disbursed.
- Private/Alternative Loans—Private/alternative 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.

Satisfactory Academic Progress (SAP) Policy

Policy Overview

The Satisfactory Academic Progress (SAP) process is administered by the Registrar’s Office, in coordination with the Financial Aid Office and Director of Education. Satisfactory Academic Progress (SAP) standards are established to ensure that students receiving federal, state, and institutional financial aid are progressing toward successful completion of their educational programs. These standards are applied consistently to all students whether or not they receive Title IV aid and are evaluated at the end of each payment period.

Federal regulations (34 CFR 668.34) require institutions to monitor both the **qualitative** (grades) and **quantitative** (pace and maximum timeframe) progress of students enrolled in Title IV-eligible programs. Students must meet all SAP requirements to maintain financial aid eligibility.

Establishment and Oversight

- SAP standards are developed by faculty in consultation with the Director of Education.

- The Financial Aid Administrator ensures compliance with federal SAP regulations.
 - If academic policy changes occur, the Director of Education Programming will notify the Financial Aid Office.
-

SAP Evaluation Schedule

SAP is evaluated at the end of each **payment period** for all students. These formal evaluations must:

- Include both qualitative and quantitative measures
- Coincide with payment period completion
- Be documented in the student's official academic file

Evaluation Point Clock Hours Completed

1st Evaluation 450 hours

2nd Evaluation 900 hours

3rd Evaluation 1100 hours

Qualitative Measure (Grades)

Students must maintain a **minimum cumulative GPA of 2.5 on a 4.0 scale** by the end of each payment period.

- Students receive official letter grades based on end-of-payment-period evaluations.
 - Mid-point evaluations are for informational purposes only and do not assign grades.
 - Any Unsatisfactory/Low pass: Limited mastery of subject matter course (grade "C-") must be repeated.
 - Students who fail to meet academic standards may be required to repeat coursework in accordance with the institution's academic policies.
-

Quantitative Measure (Pace of Progress)

The quantitative component of SAP measures the rate at which students progress through their educational program.

Students must successfully complete at least **67% of the cumulative scheduled clock hours** to be considered as making satisfactory progress.

Calculation:

$$\text{Pace} = \frac{\text{Cumulative Clock Hours Completed}}{\text{Cumulative Clock Hours Attempted}}$$

Evaluations are based on total hours accrued versus scheduled as of the last day of the evaluation period. Students falling below the 67% threshold will not graduate within the maximum time frame and may become ineligible for aid without an approved appeal.

Maximum Timeframe

Students must complete their program within **150% of the published program length** in clock hours and calendar time.

Program Length	Normal Hours	Clock Normal Duration	Max Hours	Clock Max Duration
Example Program	1300 hours	53 weeks	1950 hours	80 weeks

- If at any evaluation point it is determined that a student **cannot complete** the program within the 150% timeframe, they will become **ineligible for Title IV aid** unless an appeal is approved.
 - Graduated pace policies may be applied, allowing students to "catch up" in future payment periods, as long as completion remains possible within the maximum timeframe.
-

Appeal Process

Students who fail to meet SAP standards may appeal their ineligibility based on extenuating circumstances (e.g., illness, death of a relative, or other major disruptions).

To appeal, students must submit:

- A **completed SAP Appeal Form**
- A **personal statement** explaining the circumstances and how they have been addressed
- **Supporting documentation**
- An **academic plan**, created with the Director of Education or a designated advisor

If the appeal is approved, the student is placed on **SAP Probation** for one payment period and may continue to receive aid while meeting the terms of their academic plan.

Reinstatement of Aid

Students may regain eligibility for financial aid by:

- Successfully appealing and meeting the conditions of their academic plan
 - Attending without financial aid and regaining SAP standing by meeting cumulative requirements
-

Additional Notes

- SAP policies and evaluations apply equally to students who are not receiving financial aid.
- All formal evaluations are retained in student files for audit and compliance purposes.
- Remedial coursework may be factored into either the qualitative or quantitative SAP measures, as applicable.

Post Withdrawal Disbursement

Definition

A **Post-Withdrawal Disbursement (PWD)** is Title IV federal student aid that the student earned based on the percentage of the payment period completed at the time of withdrawal but that **was not disbursed prior to the student's withdrawal date**.

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 at TCI that are covered include:

- Federal Pell Grants
- Federal Direct Stafford Loans
- Federal Direct PLUS 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. To outline the procedures and requirements for determining and disbursing Title IV aid a student may be eligible to receive after officially or unofficially withdrawing from Transitions Career Institute (TCI). This policy ensures institutional compliance with 34 CFR 668.22(a) and applicable U.S. Department of Education (ED) regulations governing Return of Title IV Funds (R2T4).

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.

Eligibility for Post-Withdrawal Disbursement

If a student withdraws before Title IV funds have been fully disbursed:

- The Financial Aid Office will determine the amount of earned aid.
- If the student has earned more aid than has been disbursed at the time of withdrawal, a **PWD may be offered**.

A student is eligible for a Post-Withdrawal Disbursement only if:

- They **began attendance** in all registered courses;
 - They **met all eligibility requirements** for the type of aid (e.g., completed verification, enrolled at least half-time for Direct Loans);
 - Their aid was **originated and ready to disburse** before they ceased attendance;
 - The school has received a valid **ISIR/SAR** with an official **SAI** determination.
-

Post-Withdrawal Disbursement of Grants

- **Federal Pell Grant** and **FSEOG** funds may be disbursed without student confirmation.
 - PWD grant funds must be disbursed within **45 days** of the date the school determined the student withdrew.
-

Post-Withdrawal Disbursement of Direct Loans

- Loan funds **require written confirmation** from the student (or parent, in the case of a Parent PLUS Loan) before disbursement.
- The Financial Aid Office will send the student or parent a **written notification within 30 days** of the school's withdrawal determination date.
- The student or parent must respond within **14 calendar days** to accept the loan disbursement.
- If no response is received within the 14-day window, the school is not required to disburse the loan funds.
- If accepted, TCI will disburse the loan funds within **180 days** of student's

withdrawal.

Notification Requirements

The Post-Withdrawal Disbursement notice will include:

- The type and amount of loan funds eligible for disbursement;
 - The option to accept or decline some or all of the loan funds;
 - A clear deadline for responding (14 days from the date of the notice);
 - Instructions for responding in writing or electronically;
 - A statement that no disbursement will occur without affirmative confirmation.
-

Conditions Where PWD Cannot Be Made

Even if a student appears eligible, a Post-Withdrawal Disbursement **cannot be made** if:

- The student **did not begin attendance** in all courses for which aid was awarded;
 - The student or parent **did not complete loan requirements** (e.g., Master Promissory Note, entrance counseling);
 - The school does not have a valid **ISIR with an official SAI** prior to withdrawal;
 - The student has not **completed verification**, if selected, by the required deadline;
 - The student's enrollment status changed in a way that affects eligibility (e.g., dropped below half-time for loans);
 - The aid was not **originated and ready to disburse** before the withdrawal date.
-

Disbursement and Credit to Account

If the student accepts any part of the Post-Withdrawal Disbursement:

- The funds will first be applied to **outstanding institutional charges** (tuition, fees, etc.).
- Any remaining amount will be **refunded to the student or parent** (in the case of a PLUS loan borrower) within **14 days** of the disbursement.

Recordkeeping and Documentation

The Financial Aid Office must:

- Document the PWD calculation in the student’s file;
 - Maintain written confirmation of any loan disbursement authorization;
 - Keep a copy of all notifications, responses, and related correspondence;
 - Ensure all disbursements are made within required federal timelines.
- All Return of Title IV Funds and post-withdrawal disbursement procedures at Transitions Career Institute are governed by the U.S. Department of Education’s most current guidance, as published in the **2025–2026 Federal Student Aid Handbook, Volume 5: Withdrawals and Return of Title IV Funds**.

Return of Title IV Funds (R2T4) – Important Information About Withdrawing

If a student withdraws before completing more than 60% of the payment period or period of enrollment, **Transitions Career Institute (TCI)** is required by federal law to calculate the amount of federal Title IV financial aid the student **earned** up to the point of withdrawal.

There may be **Title IV funds that a student was scheduled to receive but cannot be disbursed** due to other **federal eligibility requirements**.

Example:

If a student is a **first-time, first-year undergraduate borrower** and **withdraws before completing the first 30 days** of their program, they are **not eligible to receive** any Federal Direct Subsidized or Unsubsidized Loan funds. These funds **cannot be disbursed** under federal rules unless the 30-day requirement is met.

Returning Unearned Funds

If the student (or TCI, on the student's behalf) **received more federal aid than the amount earned**, the excess amount must be **returned** to the U.S. Department of Education. The amount to be returned is the **lesser of**:

- The institutional charges multiplied by the percentage of unearned aid; **or**
- The total amount of Title IV aid received that the student did not earn.

This requirement applies **even if the school did not retain** the Title IV funds in the student's account.

Student's Responsibility for Return of Funds

If TCI is **not required to return all of the unearned Title IV funds** (e.g., some excess aid was refunded to the student as a stipend), the student may be responsible for returning the remaining amount.

Federal Direct Loans

Any required return of **Federal Direct Loan funds** will be repaid by the student (or parent, in the case of a Parent PLUS Loan) according to the terms of the loan's **Master Promissory Note (MPN)**. This means the borrower will **repay the loan over time** in scheduled monthly payments to their loan servicer.

Grant Overpayments

If a student must return unearned **Federal Pell Grant** or other grant aid, the amount to be returned is called a **grant overpayment**.

- The amount the student must repay is limited to the portion that **exceeds 50%** of the grant funds received or scheduled to be received.
- A student is **not required to repay a grant overpayment of \$50 or less**.

If a student is responsible for repaying a grant overpayment, they must make arrangements with either:

- **Transitions Career Institute, or**
- The **U.S. Department of Education** (if the overpayment has been referred to the ED).

Failure to repay a grant overpayment may result in the student being **ineligible for future federal financial aid**.

Reference:

- **34 CFR 668.22**
- **2025–2026 Federal Student Aid Handbook, Volume 5: Withdrawals and Return of Title IV Funds**

Responsibility for Title IV Funds Returned by the Institution (2025–2026)

If **Transitions Career Institute (TCI)** is required to return federal student aid funds (Title IV) on a student’s behalf, such as funds that had previously been disbursed directly to the student as a stipend, **the student may be responsible for reimbursing TCI** for the amount returned to the U.S. Department of Education.

This situation can occur when a student **withdraws from the institution before completing more than 60% of the payment period or period of enrollment**, triggering a Return of Title IV Funds (R2T4) calculation. The school is required by federal law to return any **unearned** portion of federal aid.

Institutional vs. Federal Policy

The federal **Return of Title IV Funds policy** is **separate and distinct** from TCI’s **institutional tuition refund policy**.

As a result:

- A student may still **owe a balance to TCI** for any unpaid institutional charges that remain after federal funds are returned.
- The student may also be responsible for **repaying TCI** for any portion of Title IV funds the school was required to return to the federal government on the student’s behalf.

To understand how these policies interact, students should review both the **Return of Title IV Funds policy** and **TCI’s institutional refund policy**.

Withdrawing from the Institution

Students are encouraged to speak with a financial aid representative before making any decision to withdraw. TCI will provide students with:

- A copy of the **official withdrawal procedure**;
 - A summary of **TCI's tuition refund policy**;
 - An explanation of **how withdrawing may affect financial aid eligibility**.
-

Additional Resources

For questions regarding federal student aid, students can contact the:

- **Federal Student Aid Information Center (FSAIC)**

 1-800-4-FED-AID (1-800-433-3243)

 <https://studentaid.gov>

Students and prospective students may also contact the **Financial Aid Office at TCI** for assistance or clarification regarding federal aid, institutional charges, or the withdrawal process.

Frequency of Title IV Disbursements

Policy:

This policy defines the periods and intervals at which Title IV funds are requested from the U.S. Department of Education and disbursed to eligible students enrolled at Transitions Career Institute (TCI).

Purpose:

To ensure that Title IV funds are requested and disbursed in compliance with federal regulations, without compromising student eligibility or their ability to cover educational costs in a timely manner.

Procedure:

- **Fund Requests & Reconciliation:**

Financial aid funds are requested through the Common Origination and Disbursement (COD) system and are reconciled regularly using the U.S. Department of Education's External Cash Management (ECM) reports and TCI's internal bank statements.

- **Disbursement Timing & Eligibility:**

The Fiscal Office credits student accounts after verifying attendance and confirming eligibility. Disbursements occur only after the drop/add period has ended and a student has begun attendance in the relevant payment period.

- **Disbursement Schedule for Clock-Hour Program (1300 hours):**

TCI's Practical Nurse Program is structured into two academic years. Federal loans are disbursed in payment periods as follows:

- **First Award Year:**

- **First Payment Period:** 0–450 clock hours
- **Second Payment Period:** 451–900 clock hours

- **Second Award Year:**

- **Third Payment Period:** 901–1300 clock hours

- **30-Day Delay for First-Time Borrowers:**

Per federal regulation, disbursements for first-year, first-time borrowers of Direct Subsidized or Unsubsidized Loans will be delayed by 30 days from the start of the loan period.

- **Enrollment Requirement:**

For all Title IV loans, including Direct PLUS Loans, students must be enrolled at least half-time and must have begun attendance in the applicable payment period. If a student fails to begin attendance, the loan disbursement must be canceled.

- **Refunds and Credit Balances:**

- If a student's account results in a credit balance after institutional charges are paid, the excess amount is refunded by TCI via institutional check.
- Students or parents (in the case of PLUS loans) will be provided with a disbursement preference form to choose how they would like to receive any credit balance.
- Refunds are processed promptly in accordance with federal cash management regulations.
- TCI must **provide a credit balance refund** to the student **within 14 calendar days** of the date the credit balance is created **on the student's account**. Refunds must be issued **by check, electronic funds transfer (EFT), or direct deposit**, depending on the student's selected method.

- **Indirect Educational Expenses:**
Students are responsible for covering indirect educational expenses (e.g., transportation, personal supplies) out-of-pocket until any applicable refunds are issued based on their Title IV aid eligibility.

Federal Aid Programs in Which Transitions Career Institute (TCI) Participates

For the 2025–2026 Award Year

- TCI evaluates student eligibility for the following federal aid programs:
 - **Federal Pell Grant**
 - **Direct Subsidized Loan**
 - **Direct Unsubsidized Loan**
 - **Federal PLUS Loans** (Parent PLUS)
 - **Alternative/private loans** (as applicable)
- Upon receipt of the **Institutional Student Information Record (ISIR)**, TCI will proceed with determining the student’s award package based on the information provided.

Determination of Awards

- The **Federal Pell Grant** eligibility is determined using the student’s **Student Aid Index (SAI)**, replacing the previous Expected Family Contribution (EFC) calculation.
 - Pell eligibility depends on the SAI, the student’s enrollment status (e.g., full-time, part-time), and the **Cost of Attendance (COA)** at TCI.
 - Award amounts correspond to the **annual Pell Grant Funding Table** released by the U.S. Department of Education.

Loan Eligibility Calculations for the 2025–2026 Award Year

- **Direct Subsidized Loan Eligibility**
Calculated using the following formula:

Cost of Attendance (COA) – Student Aid Index (SAI) – Other Need-Based Aid = Subsidized Loan Eligibility

Note: Student must demonstrate financial need to qualify for a subsidized loan.

- **Direct Unsubsidized Loan Eligibility**

Determined as:

Cost of Attendance (COA) – Total Financial Aid Awarded = Unsubsidized Loan Eligibility

Note: Eligibility is subject to annual and aggregate federal loan limits. Financial need is not required.

- **PLUS Loan Eligibility (Parent PLUS or Graduate PLUS)**

Calculated as:

Cost of Attendance (COA) – Total Financial Aid Awarded = PLUS Loan Eligibility

Note: A credit check is required for all PLUS loan applicants.

Additional Notes

- The **Student Aid Index (SAI)** replaces the previous EFC calculation starting in the 2024–2025 award year as part of the FAFSA Simplification Act. The SAI may be a negative number, indicating higher financial need.
- TCI uses the **SAI-based Pell Grant formula and Federal Student Aid guidelines** to package awards accurately and in compliance with federal regulations.

Loan Deferment & Forbearance

Overview:

Transitions Career Institute’s (TCI) Financial Aid Office administers various financial aid programs, including scholarships, grants, and loans. Scholarships and grants are gift aid and do **not** require repayment. Loans and work-study opportunities are considered self-help aid because they require repayment or work performance.

Deferment and Forbearance:

A **deferment** or **forbearance** allows borrowers to **temporarily postpone** or **reduce** payments (principal and interest) on their federal student loans during certain periods, such as enrollment in school, economic hardship, or other qualifying situations, without being considered in default.

Policy:

TCI's Loan Deferment and Forbearance policy ensures that the Director of Financial Aid provides all admitted students with comprehensive information about the **terms, conditions, and repayment obligations** associated with each type of Title IV loan during:

- Entrance counseling/ Exit Counseling;
 - The application process for federal loans and aid;
 - And throughout the enrollment period, as needed.
-

Purpose:

The purpose of this policy is to ensure that students fully understand, from the outset, the **repayment requirements, interest rates**, and options for **deferment and forbearance** related to the loans they borrow. This understanding helps students plan their finances responsibly during their enrollment and after graduation.

Procedure:

- The Financial Aid Director provides individual counseling during the FAFSA application process to explain the **repayment terms, interest rates**, and available **deferment and forbearance options** for each loan type requested by the student.
- Students are encouraged to contact their loan servicers regularly to obtain statements and updates on their loan accounts.
- Students may seek clarification from the Financial Aid Office regarding any questions or discrepancies found in their loan account statements.

- Students are advised to maintain **regular loan payments** in accordance with their repayment agreements and to proactively request deferment or forbearance **if they anticipate difficulty making payments.**

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 five (5) 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 5-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 be kept 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 students’ 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 withdrawal.

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

1. Overview

Transitions Career Institute (TCI) administers federal financial aid (Title IV funds) in compliance with **34 CFR 668.22** and the **Higher Education Act of 1965, as amended**. This policy governs the **Return of Title IV (R2T4) funds** when a student withdraws, is dismissed, fails to return from an approved leave of absence, or ceases attendance prior to completing a payment period.

The purpose of this policy is to ensure that **unearned federal funds are returned** to the U.S. Department of Education in accordance with federal regulations. This policy is **separate from TCI's institutional tuition refund policy**.

2. Scope

This policy applies to all students receiving Title IV financial aid who:

- Officially withdraw from enrollment in writing;
 - Unofficially withdraw by ceasing attendance;
 - Fail to return from an approved leave of absence;
 - Are administratively withdrawn or dismissed.
-

3. Definitions

Payment Period	A designated portion of the program based on clock hours: Payment Period 1 (0–450 hours), Payment Period 2 (451–900 hours), Payment Period 3 (901–1300 hours), depending on program length.
Last Date of Attendance (LDA)	The last day the student attended class.
Date of Determination (DOD)	The date TCI officially determines that the student has withdrawn.

Scheduled Hours Total hours a student was expected to attend in the payment period, not limited to hours actually attended.

4. Financial Aid “Earning” and R2T4 Calculation

Title IV funds are considered **earned on a pro-rata basis** based on the number of scheduled hours completed in the payment period. Students completing **60% or more** of the payment period are considered to have earned **100% of their aid**.

Calculation Steps:

1. Identify total Title IV aid **disbursed** and aid that **could have been disbursed**.
2. Calculate **percentage of aid earned**:

Scheduled hours completed ÷ Total hours in payment period

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

3. Multiply % **earned** × **Total Aid** = Amount of aid earned.
4. Subtract earned aid from disbursed aid = Unearned aid to be returned.
5. Determine, if applicable, any portion the student is responsible to return.

Example:

- Payment period: 450 clock hours
- Hours attended: 172
- Earned aid: $172 \div 450 = 38.2\%$
- Unearned aid to return: 61.8%

TCI may retain earned funds to cover institutional charges, with the remainder unearned aid returned.

5. Official Withdrawal

When a student submits a written withdrawal:

1. The withdrawal date is the student's **last recorded date of attendance**.
2. TCI performs the R2T4 calculation **within 30 days** of the withdrawal.
3. Any unearned Title IV funds are returned **within 45 days** of the Date of Determination.
4. The student will receive written notification of:
 - R2T4 calculation results
 - Amounts returned on their behalf
 - Remaining balance owed to TCI

A withdrawal notice may be rescinded **prior to official withdrawal**. If the student subsequently ceases attendance again, the **original withdrawal date** will be used for R2T4 purposes.

6. Unofficial Withdrawal

Students who cease attendance without notification are considered withdrawn after **14 consecutive calendar days of absence**.

- The withdrawal date is the **last date of academic attendance**.
 - TCI will make reasonable attempts to contact the student.
 - R2T4 calculations are performed as described in Section 4.
-

7. Post-Withdrawal Disbursements

If a student has earned aid that has **not yet been disbursed**:

- TCI will notify the student (or parent for PLUS Loans) **within 30 days** of the Date of Determination.
 - Students have **14 calendar days** to accept or decline the disbursement.
 - Accepted funds are disbursed **within 90 days** of withdrawal.
-

8. Return of Unearned Funds

Unearned Title IV funds are returned in the following order, in compliance with federal regulations:

1. Unsubsidized Direct Loans (excluding PLUS Loans)
2. Subsidized Direct Loans
3. Direct PLUS Loans (Parent or Graduate)
4. Federal Pell Grants (if required to be returned)

The portion of aid considered earned is calculated **pro-rata** based on the percentage of the payment period completed. Students completing **more than 60%** of the period are considered to have earned 100% of their aid.

9. Grant Overpayments

For Federal Pell Grant overpayments:

- Students are responsible for **50% of the unearned portion**.
- Students are **not required to repay** if:
 - The total is \$50 or less, or
 - The repayment is less than 50% of total grant aid received.

If repayment is required:

- TCI will notify the student **within 30 days**.
 - Students have **45 days** to:
 1. Repay TCI directly, or
 2. Arrange repayment with the **U.S. Department of Education**.
-

10. Responsibility for Institutional Charges

Even if TCI returns unearned Title IV funds, students may **remain responsible for any unpaid tuition, fees, or institutional charges**. The Financial Aid Office will provide guidance on **balances and repayment options**.

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.

***Please note that, effective January 1, 2026, tuition increased by \$3,000, from \$24,500 to \$27,500. All other components of the Cost of Attendance (COA) remain the same.**

(LPN COA 1300 HOURS)	Without Parent	With Parent
Tuition	\$27,500	\$27,500
Registration Fee / Background Check Fee	\$100 / \$30	\$100 / \$30
Books and Supplies	\$2,500	\$2,500
Room and Board	\$32,045	\$26,845
Transportation	\$12,714	\$9,919
Personal/Misc.	\$11,284	\$11,284
Total	\$ 86,173	\$78,178

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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 \$3,000 minimum down payment 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 and registration fee are not included in total tuition.

Tuition and Books/Supplies:

Books/Supplies: \$2,500

Tuition: \$27,500

= \$30,000

Tuition Refund Information:

 8 NYCRR § 126.4 — Refund Policy for Non-Degree Granting Proprietary Schools

This regulation applies to:

- Licensed private career schools in New York State
 - Programs that exceed 1,200 clock hours
-

 Key Refund Policy Requirements under 8 NYCRR § 126.4:

- Refunds must be calculated based on scheduled hours up to the student's last date of attendance, not the hours actually completed.
 - Schools must maintain a pro-rata refund schedule for students who withdraw prior to completing the program.
 - For students who complete more than 50% of the program, no tuition refund is required.
-

Refund Policy

Tuition Refund Policy – Practical Nurse Program (1,300 Hours)

Transitions Career Institute (TCI) complies with New York State Education Department (NYSED) refund requirements for non-degree granting licensed career schools with programs exceeding 1,200 hours. Refunds are calculated based on the student's last date of attendance (LDA) and the scheduled hours attended.

Reimbursement Scale Practical Nurse Program

If Withdrawal or Cancellation Occurs:

- | | |
|---|----------------------------|
| 1. During the first week | (10%) of the total tuition |
| 2. During the second or third week | (20%) of the total tuition |
| 3. After the third week but prior to completion of 25% of the program | (45%) of the total tuition |
| 4. After 25% of the program, but not more than 50% of the program has been attended | (70%) of the total tuition |
| 5. After completion of more than 50% of the program = No refund | |

The School will retain:

The school will retain the registration fee plus a pro-rata portion of the tuition calculated on a daily basis. The registration fees are due at the time of registration and are non-refundable. Tuition is due before the class begins. ***Tuition and fees are nontransferable

⚠ Refunds apply to tuition only and do not include non-refundable fees such as registration, books, background check, NCLEX review, or graduation fee.

Federal Financial Aid Recipients (Title IV)

Students receiving federal student aid who withdraw are also subject to the Return of Title IV Funds (R2T4) policy under federal regulation 34 CFR 668.22. TCI calculates R2T4 first. Any remaining balance will be adjusted per the institutional refund schedule above.

Verification Policy

Overview

The U.S. Department of Education selects a portion of FAFSA applicants for verification to confirm the accuracy of information submitted on the FAFSA. Verification may be triggered by incomplete or inconsistent data.

In addition to federally selected students, TCI may manually select students for verification or request documentation if they:

- Submit a professional judgment request
- Request a dependency override

- Have unusual circumstances or conflicting data
 - Require review due to ineligible loan history or prior aid issues
-

Policy:

TCI will verify all ISIRs (Institutional Student Information Records) flagged for verification by the U.S. Department of Education.

The only exception is when a student:

- Is no longer enrolled in the applicable award year, and
- Has already had all aid disbursed while enrolled.

All verification procedures comply with 34 CFR 668 Subpart E and current guidance from the 2025–2026 Federal Student Aid Handbook.

Purpose:

To ensure:

- Fair, consistent, and accurate processing of financial aid
- Compliance with federal regulations
- Timely disbursement of aid based on verified information
- Transparency and accountability across student records

Procedure:

1. Notification

- Students selected for verification are notified via their **FAFSA Submission Summary** and by the **TCI Financial Aid Office**.
- Required documentation will be requested in writing or via email, along with submission deadlines.

2. Required Documentation

Depending on the type of verification or review, students may be required to submit some or all of the following:

- **Verification Worksheet** (Dependent/Independent)

- **Parent and/or Student IRS Tax Return Transcript** or signed IRS 1040 with schedules
- **W-2 Forms** (if applicable)
- **Low Income/Non-Tax Filer Form**
- **SNAP (Food Stamp) Documentation**
- **Child Support Paid Documentation**
- **Untaxed Income Documentation**
- **Statement of Educational Purpose** and valid government-issued photo ID
- **Unaccompanied Youth Form**
- **Ineligible PLUS Borrower Form**
- **Statement for Previous Loan Discharge**
- **Special Circumstances Form** (for unusual or extenuating financial hardship)
- **Dependency Change Request Form** (for dependency override consideration)
- **Financial Aid Suspension Appeal Form** (for students seeking reinstatement of aid after SAP failure)

3. **Processing Timeline**

- Students must submit documents within **30 days** of request or by the priority deadline.
- Incomplete documentation will delay aid disbursement.

4. **Review and Corrections**

- TCI will submit necessary FAFSA corrections after review of the verified information.
- Financial aid will **not be disbursed** until verification is complete and corrections (if any) are processed.

5. **Professional Judgment and Overrides**

- Students may request a review of special circumstances. All such requests must include appropriate documentation.
- The **Financial Aid Director** reviews and determines outcomes on a case-by-case basis. Decisions are final and not appealable.

Data Elements to Be Verified

Overview

For the 2025–2026 award year, the U.S. Department of Education requires schools to verify only **certain data elements** for applicants selected for **federal verification**. These elements are outlined annually in the **Federal Register** and in the **Federal Student Aid Handbook**.

While the FAFSA Simplification Act has reduced the number of required verification items, schools are still required to **resolve any conflicting information** in a student’s file, even for students not selected for verification.

Standard Verification Items for 2025–2026

If a student is selected for verification by the Department of Education, the following data elements **may be required to be verified**, depending on the student's **Verification Tracking Group (V1, V4, or V5)**:

- **Adjusted Gross Income (AGI)** (for the student, and parents if dependent)
- **Federal Income Tax Paid**
- **Number in Household** (Household Size)
- **Number in College** (Excludes parents; must be enrolled at least half-time)
- **Tax Filing Status** (to confirm whether the correct filing status was reported)
- **Untaxed Income** (e.g., IRA distributions, pensions, child support received)
- **High School Completion Status**
- **Identity and Statement of Educational Purpose** (V4 and V5 only)

 Most income-related information is **transferred directly from the IRS** into the FAFSA via the **Future Act Direct Data Exchange (FA-DDX)**. However, documentation may still be required in cases of conflicting information or if data is not transferred.

Financial Aid Administrator Responsibilities

Financial Aid Administrators (FAAs) **do not need to be tax experts**, but are responsible for identifying and resolving:

- Conflicting information (e.g., AGI not matching W-2s or FAFSA data)
- Improper filing statuses (e.g., Head of Household used incorrectly)
- Situations where an individual **should have filed** a tax return but did not
- Cases where a dependent is claimed on more than one FAFSA

FAAs must:

- Use **Verification Worksheets** (TCI forms) and submitted documentation to compare FAFSA data
 - Review **W-2s, tax documents, and non-tax filer statements** as applicable
 - Ensure that all corrections are submitted to the **Central Processing System (CPS)** via **FAA Access**
-

Resolving Conflicting or Inaccurate Information

- If TCI identifies **conflicting information** between the FAFSA and documentation (e.g., AGI, household size, enrollment status), we are required to resolve it, **regardless of verification selection**.
- All conflicting information must be resolved and corrected in the **ISIR** before:
 - Financial aid eligibility can be finalized
 - Federal Title IV aid can be awarded or disbursed

Corrections are submitted electronically through **FAA Access to CPS Online**.

Student Notification of Verification Changes

When a student's FAFSA data is selected for verification and corrections are necessary, the following protocol is followed at **Transitions Career Institute (TCI)**:

- If an **error or discrepancy** is found during the verification process, the **Financial Aid Office** will make the necessary corrections using **FAA Access to CPS Online**.
- If the corrections **impact the student's eligibility** for aid (such as Pell Grant, Direct Loans, or other Title IV funds), a **revised financial aid package** will be created.
- A **revised award letter** will be issued to the student, either electronically or in paper form, to clearly communicate the updated aid amounts and explain the reason for the change.
- Students are encouraged to review the revised award and contact the Financial Aid Office with any questions or concerns.

Awarding & Disbursement of Funds During Verification

- **No Title IV aid** (including Pell Grants or federal loans) will be **packaged or disbursed** until **all required verification documents** have been submitted and processed, and any conflicting information has been fully resolved.
- This policy applies whether the student was selected for verification by the **Department of Education** or **manually selected** by the school due to conflicting or incomplete information.
- To avoid delays in receiving financial aid, students must submit all requested verification documentation **promptly** and **respond to follow-up requests** from the Financial Aid Office in a timely manner.
- Once verification is complete and corrections (if any) are processed, financial aid will be awarded and disbursed according to federal and institutional disbursement schedules.

Database Matches, Reject ECMs, and C-ECMs Clearance

- Various issues flagged on a student’s **ISIR** (Institutional Student Information Record) must be resolved **before financial aid can be awarded**.
- These issues include:
 - **Database matches** (such as conflicting or missing data verified against federal databases),
 - **Reject Electronic Comment Messages (ECMs)** (which require mandatory resolution before processing), and
 - **Comment ECMs (C-ECMs)** (which are informational but often require follow-up or verification).
- Upon importing a new ISIR, the system automatically identifies and loads the **required documents** for resolution based on current year federal and institutional rules.
- Required documents and resolution steps are updated each academic year according to **ED regulations** and program changes.
- Students receive clear instructions on documents needed or actions required to resolve ISIR issues.
- The **Director of Financial Aid** reviews all submitted documents and oversees the resolution process until all outstanding issues are cleared.
- Once resolved, the student’s file is signed off in the system, and eligible aid is awarded accordingly.

Review of Subsequent ISIR Transactions

- The **Director of Financial Aid** must review **all subsequent ISIR transactions** for a student, even after initial verification has been completed.
 - The review process includes checking if:
 - The **Student Aid Index (SAI)** (formerly EFC) has changed,
 - There are any new or changed **“C” flags** or comment codes, or
 - There are updates to the **National Student Loan Data System (NSLDS)** information.
 - If the **SAI has not changed** and there are no changes in flags or NSLDS data, generally no further action is needed.
 - If the **SAI changes but does not affect the aid amount or type**, or the affected data elements were already verified, no action is needed.
 - However, if the **SAI changes and new or unverified data elements are affected**, the FAA must conduct further investigation and possibly re-verify.

- Whenever a **“C” flag changes** or **NSLDS data is updated**, the FAA must resolve any conflicts before awarding or disbursing aid.
-

Verification of Enrollment Status

- **Enrollment status** refers to the student’s current level of enrollment (full-time, three-quarter time, half-time, less than half-time) as defined in the **Student Handbook**.
 - TCI uses **enrollment status** primarily to determine eligibility and award amounts for financial aid.
 - Students are informed in their **award letter** of the enrollment status on which their financial aid package is based and are advised to promptly notify the Financial Aid Office if the status is incorrect.
 - If a student’s enrollment changes (e.g., drops courses or withdraws), TCI **repackages and adjusts awards accordingly**, which may decrease eligibility and/or aid amounts.
-

Special Enrollment Considerations

- Students must be enrolled at least **half-time** at the time of **federal loan disbursement** to remain eligible for loans.
- If a student was enrolled half-time as of the census date but drops below half-time before loan disbursement, the loan **disbursement must be cancelled or returned**, and the student becomes ineligible for that loan period.
- If a student **withdraws from all courses** (officially or unofficially) or is **administratively withdrawn**, the amount of aid retained or returned is calculated according to the **Return to Title IV (R2T4)** federal refund policy.

NSLDS Procedures and Responsibilities

Policy:

TCI complies with the U.S. Department of Education’s requirement to provide students with access to information regarding their federal student loan rights and responsibilities

whenever loan availability is discussed. This includes notifying students that their loan information will be submitted to and maintained by the **National Student Loan Data System (NSLDS)**, accessible to authorized users such as guaranty agencies, lenders, and institutions.

Purpose:

This policy ensures that students (or parents, in the case of PLUS loans) understand their obligations and rights under Title IV loan programs and are informed that their loan history will be reported to NSLDS. It also outlines TCI's responsibility to verify completion of the **Master Promissory Note (MPN)** and to manage NSLDS reporting in accordance with federal regulations.

Procedure:

- **NSLDS Overview:**
NSLDS is the federal database that maintains comprehensive records of all Title IV federal student aid disbursed to students, including loans, grants, and overpayments.
- **Access:**
Authorized TCI staff access NSLDS via secure login credentials to monitor student aid history, including loan defaults, Pell Grant overpayments, and remaining eligibility.
- **Adding Students to Monitor List:**
When monitoring a student, staff add the student to their NSLDS transfer and monitor list by entering the student's full name, Social Security Number (SSN), date of birth, enrollment begin date, and monitoring start date.
- **Monitoring Period:**
NSLDS monitoring typically ends 91 days after the enrollment begin date; during this period, any changes to the student's federal aid record will be electronically communicated to TCI.
- **Master Promissory Note (MPN) Verification:**
Before disbursing any Title IV loans, TCI verifies that the student (or parent for PLUS loans) has completed a valid MPN online at www.studentloans.gov.
- Students unable to complete the MPN online are provided a paper copy along with loan rights and responsibilities documentation.
- **Overpayment Reporting:**

- TCI reports all known **unresolved Title IV grant overpayments** to NSLDS within **30 days** of identification, as required by federal regulations.
- Overpayments resulting from the student’s withdrawal and **Return to Title IV (R2T4)** calculations trigger a student contact within 30 days of withdrawal determination.
- **Only student-caused overpayments are reported** to NSLDS; overpayments due to school error are repaid by the institution and not reported as overpayments on NSLDS.
- The **Director of Nursing (DON)** (or designated officer) develops and distributes a calendar of IPEDS reporting deadlines to all relevant stakeholders well in advance.
- Stakeholders collaboratively establish **internal deadlines**, typically set at least four weeks prior to the official IPEDS deadlines, to allow sufficient time for data gathering, review, and approval.
- The DON opens the IPEDS reporting portal for the relevant reporting period and gathers data from institutional sources such as the student information system (e.g., Diamond-D), financial records, and HR systems.
- Draft reports are circulated among stakeholders for thorough review, comments, and corrections to ensure data accuracy and completeness.
- The final IPEDS report is submitted after receiving the **Chief Executive Officer’s (CEO)** approval and signature.
- Both electronic and physical copies of all IPEDS submissions are securely maintained for institutional records and audit purposes.
- If IPEDS reporting requirements or platform features are updated or amended by the U.S. Department of Education, the DON promptly contacts IPEDS support for clarification before proceeding with report completion.
- TCI commits to submitting all IPEDS reports **before official deadlines** to maintain compliance. **Use of NSLDS Screens for Reporting:** TCI uses NSLDS online interfaces to report overpayments and other updates. Once reported, the student’s financial aid history, including overpayments and repayment arrangements, is updated on future **Student Aid Reports (SARs)** and **Institutional Student Information Records (ISIRs)**.

The Integrated Postsecondary Education Data System (IPEDS)

The **Integrated Postsecondary Education Data System (IPEDS)** is a comprehensive survey system established by the U.S. Department of Education's National Center for Education Statistics (NCES). It collects institution-level data from all postsecondary institutions in the United States. The purpose of IPEDS is to provide accurate and timely data to the public, policymakers, and researchers to facilitate informed decision-making about postsecondary education.

Policy:

Transitions Career Institute (TCI) is committed to submitting accurate, complete, and timely data to IPEDS in compliance with U.S. Department of Education requirements. TCI's IPEDS policy ensures integrity and transparency in all reported data, including enrollment, academic programs, financial aid, employment, demographic information, fiscal operations, and audited financial statements.

Purpose:

The purpose of this policy is to guarantee that all data reported by TCI to IPEDS faithfully represents the institution's operations and status during each reporting period. This commitment supports transparency and accountability to students, government agencies, and the public.

Procedure:

- The **Director of Nursing (DON)** (or designated officer) develops and distributes a calendar of IPEDS reporting deadlines to all relevant stakeholders well in advance.
- Stakeholders collaboratively establish **internal deadlines**, typically set at least four weeks prior to the official IPEDS deadlines, to allow sufficient time for data gathering, review, and approval.
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- TCI commits to submitting all IPEDS reports **before official deadlines** to maintain compliance.

FERPA / Non-Public Private Information Policy (NPPIP)

Student Records Privacy Policy

Overview

Student records at Transitions Career Institute (TCI) are protected under the **Family Educational Rights and Privacy Act (FERPA)**, a federal law that grants students rights over their education records and sets requirements for how educational institutions manage and disclose these records. FERPA applies to institutions receiving federal education funds and protects both paper and electronic records.

In addition to federal law, many states have privacy laws that supplement FERPA. Compliance with FERPA is mandatory to maintain eligibility for federal funding.

Student Rights Under FERPA

As a current or former TCI student, you have the following rights:

- **Right to Inspect and Review Records:**
You may request access to your education records by submitting a written request to the TCI Registrar or the Dean of Academic Affairs. The institution must comply within 45 days.

- **Right to Request Amendment:**

If you believe your records are inaccurate, misleading, or violate your privacy rights, you may request corrections in writing. Your request should specify which records to change, the desired amendment, and the justification.

- **Right to Restrict Disclosure:**

You can limit the release of certain personally identifiable information from your records, except when disclosure is authorized or required by law.

- **Right to File a Complaint:**

You may file a complaint with the U.S. Department of Education's Family Policy Compliance Office if you believe TCI has failed to comply with FERPA.

Important FERPA Details

- **Transfer of Rights:**

When a student turns 18 or enrolls in a postsecondary institution, FERPA rights transfer from parents to the student (now called an "eligible student"). However, parents retain access if the student is claimed as a dependent for tax purposes.

- **Annual Notification:**

TCI provides annual FERPA rights notification to students and parents. This notice is designed to be accessible to individuals with disabilities and those whose primary language is not English.

Definition of Education Records

Education records are records directly related to a student and maintained by TCI or parties acting on its behalf. Examples include academic records, disciplinary records, and financial aid documents.

Non-education records such as academic calendars, course syllabi, or general announcements are **not** considered education records under FERPA.

Access and Copies

- TCI will provide access to your education records within 45 days of a written request.

- If you cannot access records in person (e.g., due to distance), TCI will provide copies or make other arrangements.
 - TCI is not required to create new records or provide updates on academic progress unless such information is already part of the education records.
-

Institutional Responsibilities

- TCI maintains confidentiality and security of student records in compliance with FERPA.
- Disclosure of information from education records without consent is limited to authorized circumstances under FERPA and applicable law.

Release of Education Records

Except as provided under FERPA or other applicable laws, Transitions Career Institute (TCI) will **not disclose personally identifiable information (PII)** from your education records without your written consent.

Your written release must include:

- What specific information is to be released
 - To whom the information is to be released
 - The purpose for which the information is being released
 - Your signature and date of the request
 - The method of release (electronic, paper, or other)
-

Faculty and Staff Responsibilities

Faculty and staff must protect student identities and maintain confidentiality of student grades and evaluations. Grades linked to personal identifiers (e.g., names, student ID numbers, Social Security Numbers) **may not be publicly posted**. Posting of grades or evaluations should use randomly generated codes or numbers. The return of graded materials must be handled in a way that protects student privacy.

Other Laws and Records

Some records maintained by TCI, although not covered by FERPA, may still be subject to other federal or state privacy laws.

FERPA Exceptions for Disclosure Without Consent

TCI may disclose PII from education records without written consent in limited circumstances, including but not limited to:

- Disclosure to **school officials** with legitimate educational interests
 - Disclosure of **Directory Information** (see definition below)
 - Other exceptions as defined in FERPA and federal regulations
-

Directory Information

TCI designates the following as Directory Information, which may be disclosed without prior consent unless you opt out:

- Full name
 - Mailing and permanent addresses and telephone number(s)
 - Email address
 - Enrollment status (e.g., full-time, half-time, less than half-time)
 - Dates of attendance
 - Class level, majors/minors
 - Certification or program enrolled in
 - Cumulative credit hours
 - Participation in officially recognized activities
 - Your status as a graduate, dropped, active, failed, etc.
-

Please see the next page.

Directory Information Quick Reference Table

Note: Items marked **YES** may be disclosed to third parties upon request unless you have filed a written restriction with TCI to prevent such

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	

disclosure.

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	

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	

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.

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. 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:

- 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.

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, advise, 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.

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 8:30 - 5:00 class/ work week (Mondays through Thursdays) and, from 9:00 - 3:00 / 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 the 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;
- The extent to which time is of the essence.

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.

Voter Registration Information

Policy:

Transitions Career Institute (TCI) will provide voter registration information to all students both in paper form, displayed on campus, and electronically via the institution's website and communications.

Purpose:

To comply with federal law requiring institutions participating in Federal Student Aid programs to distribute voter registration materials and encourage civic engagement.

Procedure:

- TCI provides each student with access to their state’s voter registration forms and information either electronically or in paper form upon request.
- Students may visit <https://www.eac.gov/voters/voter-registration> to select their state and find registration forms, deadlines, and eligibility requirements.
- The Financial Aid Office can assist students with obtaining voter registration forms and answering questions.
- Students are encouraged to register to vote and participate in all national, state, and local elections.

Eligibility Requirements:

To register to vote in New York, students must:

- Be a United States citizen
- Be at least 18 years old by the next election
- Be a resident of the county for at least 30 days before the election
- **Not currently be serving a sentence, probation, or parole due to a felony conviction**

Additional Requirements:

- The registrant must complete a Voter Registration Application and/or Party Affiliation Form.
- The completed form must be mailed or delivered to the County Commissioner of Registration or Superintendent of Elections for the student’s county.
- The registration deadline to vote in the next election is 21 days prior to Election Day.

Access to Information:

- Voter registration information is available continuously.
- Information is accessible in TCI’s library and on the Orbund system.
- Voter information will also be distributed to new students during orientation sessions at the start of each new class.

Default Management Policy

Overview:

Effective default management is built upon a thorough understanding of the circumstances that lead students to default. This understanding is essential for developing a successful default management policy that supports students in meeting their financial obligations while also positioning TCI for stronger fiscal management in the future.

While most students who receive loans will not require extraordinary assistance to reduce default risk, some students may benefit from targeted, proactive support.

Policy:

TCI is committed to implementing interventions that strengthen the borrower's relationship with their loan servicer. These efforts include supplemental entrance and/or exit counseling, financial literacy education, and the collection of updated contact information.

Purpose:

To promote responsible borrowing and repayment behaviors among students while safeguarding TCI's financial stability through effective, supportive measures during the student lifecycle.

Procedures:

- Identify which students are at risk of default and understand the reasons behind it—this is critical for developing effective prevention strategies.
- Use this data to reach out to borrowers who are delinquent, whether early or late in their delinquency.
- All interventions are led by the Financial Aid Office and are based on well-established practices.
- TCI's interventions aim to promote academic success, program completion, and post-graduation employment.
- The school also implements strategies that specifically support students at risk of dropping out.

- The Director of Financial Aid collaborates with the Director of Nursing (DON) and the Registrar to identify patterns of limited student success and future default risk.
- Interventions may occur at any stage of the enrollment or repayment cycle and are informed by internal data analysis.

Examples of Interventions Based on Student Status:

- **Currently Enrolled Students:**

- Students on academic probation or enrolled in programs with higher default rates may receive:
 - Additional loan counseling
 - Financial literacy education
 - Collection of supplemental contact information
 - Enhanced student support services such as tutoring, personal counseling, or meetings with academic advisors

- **Students in Grace Period:**

- Risk-based strategies during the grace period may include:
 - Verifying and updating contact information
 - Career counseling, especially for students who did not complete their program
 - Helping students establish contact with their loan servicer
 - Reenrollment counseling for students considering a return

- **Students in Repayment:**

- Traditional outreach strategies include:
 - Early delinquency outreach, especially for non-completers or those from high-default programs
 - Late delinquency outreach (90+ days), especially if the servicer has not been able to place the student in a valid repayment status (repayment, deferment, forbearance)

Data-Driven Approach:

- TCI's default management strategies are guided by ongoing analysis of defaulters to identify borrowers at highest risk.
- A deep understanding of the enrollment and repayment cycle informs the timing and method of intervention.
- By targeting assistance based on actual need, TCI can implement cost-effective, high-impact strategies that benefit both students and the institution.

Professional Judgment Policy

Overview:

Students may request a professional judgment review when they experience significant changes in financial circumstances or face additional education-related expenses. Examples include involuntary job loss (for the student or spouse), childcare costs, study abroad expenses, or required computer purchases.

Policy:

TCI's policy ensures a consistent and equitable process for evaluating professional judgment requests. The Financial Aid Director is responsible for reviewing changes in student circumstances, verifying supporting documentation, and making determinations that may impact the student's FAFSA and financial aid eligibility.

Purpose:

To maintain uniformity and fairness in the evaluation of professional judgment requests and to ensure that all students are held to the same documentation standards.

Procedure:

- All professional judgment requests are reviewed by the Financial Aid Officer.
- Requests may result in adjustments to the student's FAFSA data, cost of attendance, and/or financial aid eligibility (including eligibility for additional Unsubsidized Loans, PLUS Loans, or private loans).

- In some cases, the request may not lead to a change in aid eligibility.
 - All decisions are documented in the student’s financial aid record within Orbund and communicated to the student.
 - Supporting documentation is securely stored in the student's financial aid file.
 - If applicable, the student will receive a revision email notifying them of updates and prompting them to review the changes for completeness and accuracy.
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Steps in the Professional Judgment Process:

1. The student contacts the Financial Aid Office to request a professional judgment review.
2. The student is provided with a Professional Judgment Form outlining the required documentation.
3. The completed form and supporting documents are submitted to the Financial Aid Office for review.
4. The Financial Aid Office evaluates the request and, if applicable, makes necessary updates to the FAFSA, cost of attendance, and/or financial aid awards.
5. The student is informed of the outcome, including any changes made to their Institutional Student Information Record (ISIR).

90/10 Revenue Policy

Retention Period: Supporting documentation will be retained for a minimum of **three award years** in accordance with **34 CFR § 668.24**

Overview

The **90/10 Rule** requires that proprietary institutions participating in Title IV federal student aid programs derive **no more than 90%** of their annual revenue from Title IV funds, and **at**

least 10% from non-Title IV sources. This rule is designed to ensure institutions demonstrate market viability beyond federal subsidies.

Policy Statement

Transitions Career Institute (TCI) complies with the 90/10 Rule under **Section 487(a)(24)** of the Higher Education Act (HEA), codified at **20 U.S.C. § 1094(a)(24)** and further detailed in **§ 1094(d)**.

TCI receives Title IV aid in the form of:

1. **Federal Pell Grants**
2. **Direct Subsidized and Unsubsidized Loans**
3. **Parent PLUS Loans**

TCI does **not** participate in Federal Work-Study, FSEOG, or other Title IV programs. We are committed to ensuring compliance by maintaining accurate revenue reporting, conducting annual calculations, and providing clear guidance to students regarding financial responsibility and funding sources.

Purpose

To ensure compliance with federal regulations related to Title IV participation and maintain institutional eligibility by accurately calculating and documenting the proportion of Title IV and non-Title IV revenue.

Procedure

1. Title IV Revenue (Included in the 90%)

Includes all cash received from:

1. **Pell Grants**
2. **Subsidized/Unsubsidized Direct Loans**
3. **Parent PLUS Loans**

Funds are included if used to pay institutional charges (tuition, fees, books, and supplies).

2. Non-Title IV Revenue (Included in the 10%)

Must be recognized on a **cash basis** and may include:

1. **Student payments by cash, credit card, or check**
2. **Private education loans** (e.g., Sallie Mae)
3. **Employer-paid tuition assistance**
4. **External scholarships and grants**
5. **Payments for eligible non-Title IV programs**
6. *Note:* Military education benefits (e.g., GI Bill, Tuition Assistance) are now counted as **federal** revenue per the **American Rescue Plan Act of 2021**

3. Excluded Revenue

The following are not included in either the numerator or denominator:

1. Institutional match contributions
2. Refunds or returned Title IV funds
3. Non-institutional charges (e.g., equipment not bundled into tuition)
4. Work-Study funds (TCI does not participate)

4. Annual Calculation

1. Performed on a **cash accounting basis** at the end of each institutional fiscal year
2. The 90/10 ratio = **Title IV revenue ÷ Total eligible revenue**
3. Conducted by the Finance Department and documented for audit purposes
4. Reported in TCI's **audited financial statements** and submitted via **eZ-Audit**

5. Compliance Monitoring and Sanctions

1. If TCI fails to meet the 90/10 requirement for **one year**, the U.S. Department of Education must be notified

2. If the rule is violated for **two consecutive years**, TCI will lose eligibility to participate in Title IV programs
 3. Preventive measures include enrollment counseling, aid packaging strategies, and regular internal reviews
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Regulatory References

1. **Higher Education Act of 1965**, as amended
 - i. 20 U.S.C. § 1094(a)(24), § 1094(d)
 2. **34 CFR § 668.28**
 3. **American Rescue Plan Act of 2021**
 4. **Federal Student Aid Handbook 2025–26**, Volume 2, Chapter 6
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Title IV Revenue Adjustments

1. Excluded from Title IV Revenue (Adjustments)

The following sources of funds must be **excluded** from the Title IV revenue calculation in the 90/10 formula:

- **Federal Work-Study (FWS)** funds, unless directly credited toward institutional charges
- **LEAP, SLEAP, and GAP** funds received from the state
- **Campus-Based matching contributions** (e.g., institutional share of FWS or FSEOG)
- **Returned Title IV funds** (e.g., R2T4 refunds)
- **Administrative Cost Allowances (ACA)**
- **Title IV credit balances** (i.e., funds refunded to students in excess of institutional charges)
- **Revenue from books, supplies, and equipment**, unless:
 - They are *required* for enrollment or attendance;
 - The charges are listed separately in the enrollment agreement or catalog; and

- The institution provides the items directly.
 - **Non-institutional revenue sources** (e.g., cafeteria, dorm fees, parking)
-

2. Title IV Revenue (Included in 90%)

The following Title IV program funds are **included** in the 90% calculation when used to pay **institutional charges**:

- **Pell Grants**
- **Direct Subsidized Loans** (up to allowable limits)
- **Direct Unsubsidized Loans** (up to allowable limits)
- **Parent PLUS Loans**, if used to pay institutional charges
- **FSEOG** funds credited to the student's account, minus the institutional match
- **Federal Work-Study (FWS)** funds, but only if credited directly toward tuition, fees, or other institutional charges (also reduced by the institutional match)

Note: Under the **Presumption Rule**, Title IV funds are assumed to cover institutional charges **first**, regardless of whether funds are disbursed directly to the student or applied to their account.

3. Non-Title IV Revenue (Included in 10%)

These **non-Title IV funds** count toward the 10% revenue requirement:

- **Cash, check, debit/credit card payments** from students or families
- **Private student loans** (e.g., Sallie Mae)
- **External scholarships or grants** from private or nonprofit organizations
- **Employer-paid tuition assistance**
- **Institutional scholarships** funded by restricted or non-federal accounts
- **Payments from contracts** with government or employers for training low-income individuals
- **Funds from 529 plans** or other tax-advantaged education savings accounts

4. Qualified Non-Title IV Program Revenue

Revenue from non-Title IV eligible programs may be included in the 10% if the program:

- Is **approved by a State agency**
- Is **accredited** by a recognized accrediting body
- Provides an **industry-recognized credential** or certification
- Offers training **required for state licensure or certification**

5. Application of Funds Rule (Best Practice for Sequencing)

To ensure accurate 90/10 compliance, institutions should apply the following **non-Title IV funds first** when covering tuition, fees, and required institutional charges:

- **Non-federal grants and scholarships**
- **Payments from state or local contracts**
- **Qualified education savings plans** (e.g., 529)
- **Institutional aid** from designated or restricted accounts

If these funds, combined with Title IV aid, **exceed institutional charges**, the **Title IV portion must be reduced** accordingly in the 90/10 calculation.

6. Adjustments to Title IV Revenue

When calculating the 90/10 ratio:

- **FSEOG and FWS funds** are reduced by the **institutional matching portion**
- **Returned Title IV funds (R2T4)** reduce Title IV revenue
- **Unsubsidized loan amounts** exceeding annual or aggregate limits **do not** count toward Title IV revenue
- **Student payments** exceeding institutional charges are treated as **non-Title IV revenue**

- Revenue from institutional activities only counts if tied directly to **educational programs** (see Section VII)
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7. Revenue from Institutional Activities

Revenue from institutional activities may be included **only if**:

- Conducted **on campus** or at a **school-controlled facility**
 - Supervised by **institutional faculty or staff**
 - **Required for all students** in a specific educational program
 - Revenue is directly related to the **instructional program**
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8. Reporting & Sanctions for Noncompliance

If TCI fails to meet the 90/10 rule, it must:

- **Report** the failure to the U.S. Department of Education within **45 days** of the end of its fiscal year
- **Submission instructions** are available in the latest **FSA Handbook** or official **Federal Register notices**

Penalties:

- **First-year failure:** Institution is provisionally certified for **two years**
 - **Two consecutive years:** Institution **loses Title IV eligibility** for **at least two fiscal years**
 - To regain eligibility, the institution must:
 - Remain in compliance for two consecutive fiscal years
 - Meet all **state licensing, accreditation, and financial responsibility** requirements
-

9. Prohibited Practices

Institutions **must not**:

- Restrict student access to **Title IV funds** (e.g., deny access to Direct Loans)
- Apply **unequal charges** to students based on funding source
- Count **non-institutional charges** or **Administrative Cost Allowance (ACA)** as institutional revenue in the 90/10 calculation

Manual Version

2025–2026 Financial Aid Policy & Procedures Manual

Effective Date

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Tuition increase effective January 1, 2026

Last Reviewed

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Reviewed By

Quebillah Perry/ Financial Aid Coordinator

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