

**New York Medical  
Career Training Center  
Financial Aid  
Policies & Procedures  
Manual**

**Clock Hour Schools**

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## **GENERAL ADMINISTRATIVE REQUIREMENT**

This financial aid policies and procedures manual is intended to reflect updated federal, state and institutional regulations and provide guidance to the administrators in administering and monitoring financial aid processes. This is also useful to other offices for appeal and academic review, financial and compliance auditors, state and federal program reviewers.

### **SECTION A:**

## **ADMINISTRATIVE ORGANIZATION AND OFFICE MANAGEMENT**

### **Introduction to the Financial Aid Office**

The office of financial aid is central in the processing and monitoring of all financial aid including federal, state, outside agencies and institutional as applicable. This office works in close coordination with the admissions, accounts and registrar's office.

### **Purpose & Philosophy of the Financial Aid Office**

Our mission is to fulfill the educational and professional career needs of growth oriented individuals who are prepared to change or upgrade their careers and lives for the better. Therefore we offer educational programs in the fields where potential job opportunities exist.

The Office of Financial Aid is dedicated to provide information, guidance and advice to students in securing funding to fulfill their financial obligations and educational needs and process all Title IV aid for which students are eligible. The director and the staff members in the office are available during the normal business hours.

### **Financial Aid Office Structure & Position Responsibilities**

The Director of Financial Aid is responsible for administering all Title IV awards including awarding, cancellation, and return of funds. The Director completes all regulatory reporting.

The staff members counsel, package, complete verification process and resolve 'C' code comments concerning FAFSA. They coordinate and consult with ECM - the third party service provider for processing of all Title IV aid.

## **Financial Aid Office Administration**

The Office of Financial Aid is open for prospective and continuing students and parents all year round in the following hours and days except all national and institutional holidays and inclement weather related emergency closures.

**Monday - Friday**  
**9 a.m. - 5 p.m.**

**Telephone : ( 718) 460-4340**  
**Fax: (718) 539-9655**

**E-Mail address: [gz@nymedtraining.com](mailto:gz@nymedtraining.com)**

The staff in the Office of Financial Aid at New York Medical Career Training Center is dedicated to assisting students and their families and opening the doors for them to a quality private education.

While the primary responsibility of meeting postsecondary education costs rests with the student and family, our financial aid professionals seek to maximize financial aid opportunities by providing guidance and information about Title IV grants, loan programs, student employment, and payment options.

More than 90 percent of New York Medical Career Training Center's students generally receive financial aid, take advantage of different payment options, or participate in the parent loan program.

## **Policies & Procedures Development Responsibilities**

The Board of Trustees/Directors is ultimately responsible to develop policies and procedures and their periodic reviews and updates.

Generally, updates are made as the federal and state regulations changes, otherwise every year policies and procedures are reviewed and notified to all concerned via email and inter-office memorandum. This policies and procedures manual are available online in the institution's official website. The web address is [www.nymedtraining.com](http://www.nymedtraining.com)

The Office of Financial Aid frequently checks ED's Information for Financial Aid Professionals (IFAP) web site as it is a Title IV requirement for schools to have access to the IFAP website. Although it is not a requirement that school subscribe IFAP's notification services, New York Medical Career Training Center subscribes and the IFAP's subscription service notifies its financial aid professionals via e-mail of new and timely statutory and/or regulatory changes.

Also, ECM's Monthly Newsletter is used to keep our school abreast of new regulations, laws, and ED policy guidance. The school's Board of Director/Trustee minutes are also used as guides for new policies and procedures.

### **Administrative Organization & Office Management**

Various offices such as the financial aid office, bursar/registrar, admissions, academic affairs and accounting office work together in a cohesive manner to ensure compliance and a system of checks and balances with the Title IV programs and their regulations.

### **Job Description for Key Positions:**

#### **Financial Aid Director:**

The candidate must possess a Bachelors Degree and have a minimum of one year experience in Financial Aid. The candidate must have very strong management skills as well as current knowledge of federal financial aid programs, processes and regulations.

Knowledge of the computer window system or other similar systems is necessary.

The names of three professional references, at least one a current or former supervisor is required.

The Financial Aid Director must have the ability to communicate with other offices within the institution, government agencies, state agencies, students and parents. A sincere desire to assist students achieve their goals through education is a must. The ability to work with the other offices of the institution, the Admissions Office, the accounts office, the Registrar, Student Services is most important.

#### **Director of Accounts:**

The candidate must possess a Bachelors Degree and have a minimum of one years experience in the accounting field. The candidate must have very strong management skills as well as a current knowledge of the Blue book which relates to financial aid programs, processes and regulations from an accounting standpoint.

Knowledge of the computer window system or other similar systems is required.

The Accounts Director must have the ability to communicate with other offices within the institution, government agencies, state agencies, students and parents. A sincere desire to assist students achieve their goals through education is a must. The ability to work with the other offices of the institution, the Admissions Office, the financial aid office, the Registrar, Student Services is most important

## **Separation of Duties**

These various offices work independently as required by the regulatory agencies but in close coordination and report to CEO/President of the school. The admission office is responsible for recruitment, admissions, registration and orientation of new students. The office of financial aid is responsible for processing FAFSA application, needs analysis, awarding and processing of all Title IV aids, institutional and outside grants and scholarships. The bursar/accounting office maintains all student records related to all payments including Title IV awards. They are responsible for maintaining individual student accounts and continuous update of the student ledger cards. Registrar or the Director of Academic Affairs is responsible for recording grades, monitoring and implementing attendance, leave of absence and satisfactory academic progress policies and procedures.

## **Admissions:**

The programs offered at New York Medical Career Training Center are designed to prepare an individual for employment in their field of study.

The programs offered by New York Medical Career Training Center are open for regular enrollment to men and women who possess a high school diploma or the equivalent, and the ability to benefit from the training offered. Prospective students are invited to visit the school and discuss their needs, goals and objectives with an Admissions representative.

A student interested in applying to New York Medical Career Training Center may begin the process by completing the Application for admissions. This may be obtained by calling the school admissions office at (718) 460-4340, or printing an application by going to the New York Medical Career Training Center website at [www.nymedtraining.com](http://www.nymedtraining.com)

Applicants must meet the following requirements to be admitted to the New York Medical Career Training Center:

- Complete the application and submit it to the Admissions Office at the address on the form with a \$100 non-refundable application fee.
- Submit official transcript, diploma, or recognized equivalency confirming High School Graduation, G.E.D., or Ability to Benefit Test Scores. The school will consider a non-high school graduate for enrollment if they exhibit and possess the ability-to-benefit from the education and training offered, and have met all other standards for admissions
- Students who have graduated from a foreign high school but sign a statement indicating they are a foreign high school graduate. They are

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required to provide a copy of the diploma but if this is not possible, the signed statement will suffice.

- Submit proof that you are a U.S. Citizen or Permanent Resident.

Once accepted to the program, a student must complete an Enrollment Agreement, provide a copy of their social Security Card and Driver's License and complete all necessary paperwork.

Applicants are encouraged to visit the Admissions Office

### Admissions Office Principles of Good Practice

Schools and individuals dedicated to the pursuit of higher education believe in the dignity, worth and potential of each student. They strive to eliminate bias within the education system based on ethnicity, creed, gender, sexual orientation, age, political affiliation, national origin and disability.

1. Admissions personnel will make protecting the best interests of all students a primary concern in the admission process by subscribing to and practicing ethical behavior.
2. Admissions personnel will evaluate students on the basis of their individual qualifications and strive for inclusion of all members of society in the admission process.
3. Admissions personnel will provide accurate admission and financial aid information to students, encouraging all students to participate in the process and act responsibly.
4. Admissions personnel will honor students' decisions regarding where they apply and choose to enroll.
5. Admissions personnel will be ethical and respectful in their counseling, recruiting and enrollment practices
6. Admissions personnel through their interaction with the Financial Aid Office will strive to provide equal access for qualified students through education about financial aid processes and.
7. Admissions personnel will abide by local, state and federal laws regarding the treatment of students and confidential information.
8. Admissions personnel will develop a set of admissions-related definitions and deadlines.
9. Admissions personnel believe our profession is based upon trust, mutual respect and honesty with one another and with students.
10. Admissions personnel are committed to educating students, their families, and ourselves about the transition to and within postsecondary education.

In addition the Admissions staff will:

1. Accurately represent and promote their schools.
2. Not use disparaging comparisons of competitors.

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3. Not offer or accept any reward or remuneration from a secondary school, agency or organization for recruitment or placement of students.
4. Be responsible for compliance with applicable laws and regulations with respect to the students' rights to privacy.
5. Not publicly announce the amount of need-based aid awarded to any student without his/her mission
6. Not guarantee admission or financial aid prior to an application being submitted.
7. Send and receive information about candidates in confidence.
8. Be responsible for ensuring the accurate representation and promotion of the institution in recruitment materials, presentations and scholarship materials.

### **Foreign Student Information:**

#### I. PURPOSE

- A. It is the policy of New York Medical Career Training Center to register Foreign Nationals within the guidelines established through federal and state law. The U.S. Virgin Islands, Guam and Puerto Rico are not foreign countries and their residents enjoy all the benefits of U.S. Citizens with regard to education. U.S. bases in foreign lands are also considered American property (regardless proof of high school education MUST be in English and equivalent to U.S. high school education.

#### II RESPONSIBILITY

- A. It is the responsibility of our Admissions coworkers to adhere to the registration process for foreign nationals in the New Student category.
  1. Proof of Education-all foreign records of education to be used for "proof of high school education "must meet the following requirements:
    - a. The forms must be in English
    - b. The documentation must demonstrate that the education is equivalent to a U.S. high school education.
      - 1.) Acceptable documentation must be approved and provided by an acceptable testing service such as World Education Services (WES) or Globe Language Services (Globe). WES has an application process on-line ([www.wes.org](http://www.wes.org)).

Hard copy applications for WES may also be ordered through Name of School normal paper supply process. Please remember that a more expensive expedite process is available through WES, it is more expensive (nearly \$200) in addition to the normal evaluation charge. Globe has similar evaluations services to WES with an on line application ([www.globelanguage.com](http://www.globelanguage.com)). Globe's service (10 days) is \$70.00 and one (1) to five (5) days anywhere from \$50.00 to \$175.00 IN ADDITION to the evaluation fee! While other service organizations may be available the service must be recognized by the U.S. Department of Education. The student is responsible for all fee charges to have their proof of education either translated or evaluated. These services usually will require a credit card or cash/check payments in U.S. currency.

### III PRACTICE

- B. Foreign Nationals allowed in New York Medical Career Training Center who are not U.S.citizens.  
This type of individual must posses and provide to New York Medical Career Training Center one of the following:
1. Certificate of Citizenship-must have the student's name, certificate number and the date was issued.
  2. Certification of Naturalization-must have the student's name, certificate number, Alien Registration Number and the name of the court (and date) where naturalization occurred.
  3. "Certification of Birth Abroad" (Form FS-545,DS-1350 or FS-240 "Report of Birth Abroad"-must have embossed seal "United States of America" and "State Department".
  4. Permanent Resident-must have a "Permanent Resident Card" form I-551 or the "Alien Registration Receipt Card" form I-151
  5. Foreign Passport with current visa and valid I-94-must have a visa labeled; A-1, A-2,A-3,E-1,E-2,G-1,G-2,G-3,G-4,H-1B,H-1C,H-2A,H-2B,H-3,H-4,I, J-2,L,O and R.

### **Frequent Contact Information**

For all admission related matters, contact

Wijanti Panjwani  
Director of Admissions  
New York Medical Career Training Center  
Tel: (718) 460-4340  
Fax: (718) 539-9655  
Email: [nymedical@hotmail.com](mailto:nymedical@hotmail.com)

For all financial aid matters, contact  
GuangZhen (Carter) Xiao  
Director of Financial Aid  
New York Medical Career Training Center  
Tel: (718) 460-4096  
Fax: (718) 539-9655  
Email: [gz@nymedtraining.com](mailto:gz@nymedtraining.com)

For all Academic Affairs matters, contact  
Wijanti Panjwani  
Director of Academic Affairs  
New York Medical Career Training Center  
Tel: (718) 460-4340  
Fax: (718) 539-9655  
Email: [nymedical@hotmail.com](mailto:nymedical@hotmail.com)

For all Student Accounts matters, contact  
Wijanti Panjwani  
Bursar  
New York Medical Career Training Center  
Tel: (718) 460-4340  
Fax: (718) 539-9655  
Email: [nymedical@hotmail.com](mailto:nymedical@hotmail.com)

### **Accommodations for Disabilities**

The New York Medical Career Training Center fully complies with the provisions and requirements of the Americans with Disabilities Act (ADA) 1984.

### **Appointments with Staff**

Students and parents may come and speak to our financial aid staff members as walk-ins during the regular office hours. They may also call ahead of time and make appointment to meet the financial aid counselors and the director if necessary. The office can also be reached via email, or fax. The student and/or  
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the parent are notified and confirmed by email, return phone call or fax of such appointments.

The policies for hiring, evaluating, promoting and taking disciplinary action or termination of a staff member are available in the Human Resources Office. The school does not discriminate in its hiring procedures based on race, ethnicity or religion. The school is a drug free workplace. It distributes drug information to students and staff each year.

### **Treatment of Correspondence/Forms**

All forms such as Free Application for Federal Student Aid (FAFSA), verification worksheet, FERPA release form, Entrance & Exit Interview forms, dependency override form, professional judgment request form etc. are available in the Office of Financial Aid. These forms may be mailed to student upon request. A copy of Financial Aid estimate and award notification may be obtained upon request.

To obtain maximum consideration for financial aid, the student and family must learn:

- About eligibility for various funding programs that are available.
- To follow instructions provided on various application forms and other materials.
- To pay careful attention to deadline dates.

Timely submission of application forms and other required documentation will enable our staff to process your requests accurately and in a timely fashion for the start of classes each time.

### **Telephone**

The person assigned to answer telephones will route all calls concerning financial aid to the Office of Financial Aid. You can always contact us directly with any questions or concerns. Our direct contact number is 718-460-4340

### **Confidentiality of Student Records**

New York Medical Career Training Center maintains complete confidentiality of student's records as per FERPA (Family Education Rights and Privacy Act) of 1974.

### **Record Management and Retention:**

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The school maintains hardcopy individual student files (paper folders) and computerized student ledger cards, grade sheet, attendance records if applicable, academic records, admission records etc. and retains them for 5 (five) years. Some records such as Direct Loans Master Promissory Notes, entrance and exits interview forms are preserved indefinitely. Files older than two years if required by auditors, reviewers must be pulled out of archives and requests for such files must be made in advance in writing.

Electronic records are backed up each night and a copy of the back up is housed off campus.

Each person has a password which allows them to have access to the computer system. Password changes must be made at set intervals and there is access revocation for unsuccessful logins.

The school maintains all required records for a minimum of three years from the end of the award year.

Pell grant records must be kept three years from the end of the award year for which the aid was awarded.

FISAP and supporting records must be kept three years from the end of the award year in which the report was submitted

Direct Loan reports must be kept for three years after the end of the award year in which they were submitted, while borrower records must be kept for three years from the end of the award year in which the student last attended.

### **Information Sharing & the Family Education Rights and Privacy Act of 1974**

#### **What is FERPA?**

The Family Rights and Privacy Act of 1974, as amended, (commonly known as the Buckley Amendment) is a federal law which provides that schools will maintain the confidentiality of student education records. The law basically says that no one outside the institution shall have access to students' education records nor will the institution disclose any information from those records without the written consent of students. There are exceptions, of course, so that certain personnel within the institution may see the records, including persons in an emergency to protect the health or safety of students or other persons.

#### **What is considered Directory Information?**

In compliance with **FERPA**, the following statement reflects New York Medical Career Training Center's policy:

*The following directory information may be released by telephone: a) student's dates of attendance; b) date of graduation and degree or certificate earned. Other*

*kinds of directory information, such as a student's address, telephone listing, program of study, awards received, and the most recent previous education agency or previous institution attended, will be released only in response to a written request. NEW YORK MEDICAL CAREER TRAINING CENTER reserves the right to refuse the above information if the reason for the request is not considered to be a sufficient need to know. Information regarding the student's record: grades, courses, GPA, social security number and other personal information will not be released without the student's written consent.*

However, the Act states that each student has the right to inform New York Medical Career Training Center that any or all of the information is not to be released. No information will be released without the written consent of the student. This status is binding until such time that NEW YORK MEDICAL CAREER TRAINING CENTER is notified in writing by the student to permit release of "directory information".

### **What about . . . . ?**

#### **Parental Access to Children's Education Records**

At the postsecondary level, parents have no inherent rights to inspect a student's education record. The right to inspect is limited solely to the student. Records may be released to parents only under the following circumstances: (1) through the written consent of the student, (2) in compliance with a subpoena, or (3) by producing a copy of the most recent Federal Income Tax form showing that the student was claimed as a dependent.

#### **Posting of Grades by Faculty**

The public posting of grades either by the student's name, institutional student identification number, or security number without the student's written permission is a violation of **FERPA**.

#### **Your responsibilities as a Staff Member**

As an employee of New York Medical Career Training Center, you may have access to student education records. Their confidentiality, use, and release are governed by **FERPA**. Your utilization of this information is governed by the regulations and the duties and responsibilities of your employment and position. Unless your job involves release of information and you have been trained in that function, any requests for disclosure of information, especially from outside the school should be referred to the Director of the Academic Affairs. Release of information contained on a student's record without the written consent of the person identified on the document is in violation of Sec. 438 Public Law 90-247. As a school employee, all of you should have your own accounts and passwords on the administrative computer system and on e-mail. You are responsible for your personal account and will be held accountable for any improper use. Protection of your sign-on password and procedure is critical for security. Your password is the only protection your account has,

and the only way the computer system can verify that you are actually who you say you are. Please pick a good password and protect it.

**In Summary, Remember . . .**

# checking a person's picture identification when releasing education records is required. Always check to see if the student permitted disclosure of information before you release any information on the student.

# discussing a student's record with any person who does not have a legitimate educational interest is a violation of **FERPA**. This pertains to conversations on and off the job.

# removing any document from the office for non-business purposes is a violation of **FERPA**.

# releasing confidential student information (non-directory) to another student, College or University, organization, or to any person who does not have a legitimate educational interest, or to the parents of a dependent student without the student's written authorization is in violation of **FERPA**.

# Leaving reports or computer screens containing confidential information in view of others who do not have a legitimate educational interest in the data or leaving your computer unattended is in violation of **FERPA**.

# making personal use of student information is in violation of **FERPA**.

# allowing another person to use your computer access code is in violation of **FERPA**.

# putting paperwork in the trash with a student's information (i.e., social security number or grades) is also in violation of **FERPA**.

# In addition to the possibility of personal litigation, proven **FERPA** violations may result in loss of federal funds to New York Medical Career Training Center

# Violation of confidentiality and security may lead to appropriate personnel action.

Authorization Consent Form

**New York Medical Career Training Center  
FAMILY EDUCATIONAL RIGHTS AND PRIVACY ACT  
STUDENT RELEASE**

Student Name (Last, First) \_\_\_\_\_

Student ID# or SSN# \_\_\_\_\_

**Student's Authorization for Disclosure**

I hereby waive my rights under the Family Educational Rights and Privacy Act of 1974 (FERPA) and authorize New York Medical Career Training Center to discuss and/or disclose the following education records to the person listed below:

Transcripts

Financial records

Disciplinary Records: \_\_\_\_\_

(Specify incident or indicate "All")

Other \_\_\_\_\_

(Please specify)

All information regarding my enrollment at New York Medical Career Training Center without limitation

Name of Authorized Person: \_\_\_\_\_

Relationship to Student: \_\_\_\_\_

Address of Authorized Person: \_\_\_\_\_

City \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone # (\_\_\_\_) \_\_\_\_\_ - \_\_\_\_\_

The purpose of releasing this information is

\_\_\_\_\_

**I understand that this authorization will be in effect as long as I am a student at New York Medical Career Training Center or until I revoke this authorization in writing.**

I affirm that I have carefully read the foregoing authorization and that I fully understand the meaning and intent of this document. I affirm that I have signed this authorization voluntarily.

Student Signature \_\_\_\_\_ Date \_\_\_\_\_

This authorization form is not required when school transmits information to state and federal agencies concerning processing of Title IV aid. This authorization is not also required if student files are subject to institutional, state and federal program review and audit.

**Information Release via Telephone**

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No information concerning any student is released to any individual, group or organization via telephone, cellular phone or other similar devices unless that individual, group or organization is involved in the awarding and processing of student's Title IV aid.

### **Title IV Code of Conduct:**

New York Medical Career Training Center disseminates the following information annually to all of the institution's officers, and employees.

The institution's officers, and employees may not receive directly or indirectly, points, premiums, payments, stock or other securities, prizes, travel, entertainment expenses, tuition payment or reimbursement, the provision of information technology equipment at below market value, additional financial aid funds or any other inducement from a guaranty agency or eligible lender in payment for securing applicants for FFEL loans.

The institution or its employees may not provide names and addresses and/or e-mail addresses of students or prospective students or parents to eligible lenders or guaranty agencies for the purpose of conducting unsolicited mailings, by either postal or electronic means, of FFEL student loan applications.

The institution will not allow any employee of the guaranty agency or eligible lender to perform any school-required function for a school participating in the FFEL Program, except exit counseling. The institution will not permit guaranty agencies to conduct fraudulent or misleading advertising concerning loan availability, terms or conditions.

New York Medical Career Training Center will not permit an employee to enter into a consulting arrangement or other contract with an eligible lender.

The institution will not permit an employee working in the student financial aid office to serve on an advisory board for an eligible lender.

### **Third Party Servicers:**

New York Medical Career Training Center contracts with a third-party servicer, ECM, to process FAFSAs, request funds, draw down funds to the institutional Federal Bank account, process refunds and deal with questions between the school and the Federal agencies.

Only the owner of the institution can make the decision to use a third-party servicer. He/she will confer with the various offices within the institution that will be affected by the contract with the third party servicer.

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New York Medical Career Training Center uses Educational Compliance Management (ECM) as its third party servicer.

A different third party servicer may administer the Ability to Benefit test. This must be a person or organization outside the institution that has been certified by the particular test company to administer the test. New York Medical Career Training Center is using the Wonderlic test. The test is administered by Elena Coman.

### **Compliance Audits**

New York Medical Career Training Center participates in Title IV programs. As such, to meet the statutory requirements of the Department of Education it undergoes an annual compliance audit conducted by a CPA firm currently Harvey Glick & Associates, who is sufficiently independent of the school. The independent auditor must be a certified public accountant or a government auditor. All audits are submitted along with an audited financial statement to the Department of Education (ED) as required. In addition ECM, the third-party service provider who performs certain student financial assistance functions for NEW YORK MEDICAL CAREER TRAINING CENTER does also submit an annual compliance audit and a financial statement.

The financial statements to be submitted must cover the New York Medical Career Training Center's last complete fiscal year. ED defines the scope of the financial statements needed, as well as any documentation deemed necessary to determine the school's financial responsibility. Accordingly, since NEW YORK MEDICAL CAREER TRAINING CENTER is a proprietary school, all required audits are submitted on-line via ED's eZAudit Web site at [www.ezaudit.ed.gov](http://www.ezaudit.ed.gov).

### **Type of Audit**

The type of audit a school undergoes depends on its method of control: public, for profit, or nonprofit. The audit requirements for public colleges, state and local universities, and nonprofit institutions are satisfied by the Single Audit Act, in accordance with Office of Management and Budget's (OMB) Circular A-133. Since NEW YORK MEDICAL CAREER TRAINING CENTER is a proprietary school, it is required to use ED's Audit Guide as per GEN-00-05. Although the financial aid office may not be directly involved in every phase of an audit, staff should be knowledgeable about the process.

As per section 668.23(g)(4) of HEA 1965, NEW YORK MEDICAL CAREER TRAINING CENTER is solely responsible for any liability owed by the institution's third-party servicer ECM for a violation incurred in servicing any aspect of that institution's participation in the Title IV programs.

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The Offices of Financial Aid, Academic Affairs, Registration and Student Accounts are involved in the audit process and must cooperate fully with any audit or the ED, accrediting agency, state licensing agencies or ECM program review. The President/CEO of the School is responsible for coordinating the overall audit process. The School Director contacts with the auditor. A complete student file containing enrollment, academic, financial aid, and accounting records must be provided to the auditor upon request for any student under review or audit. The School Director is responsible for addressing, correcting and reconciling any findings within one month from the date of receipt of the audit report or the federal deadlines which ever is earlier. Both the Office of Financial Aid and Student Accounts are responsible for ensuring any repayments (as a result of any liabilities) are made in the time frame as specified by the ED explained in the overpayment section in this manual.

The financial aid office participates in the audit process in the following manner:

The financial aid office receives notices of requested sample records from the Director of School and the Director of Financial Aid coordinates with the auditor as permitted by the Director of School and provides those records. Individual student files, computer printouts of the latest student ledger card, attendance records etc. are provided to the auditor in alphabetical order. The Director of Financial Aid receives a copy of any audit findings. The Director of Financial Aid along with the Director of School coordinates information that is provided to an auditor, as well as communicates with the auditor during his or her time on the NEW YORK MEDICAL CAREER TRAINING CENTER campus.

### **Audit Submission Schedule**

All audits must be prepared on a fiscal-year basis i.e. January 1<sup>st</sup> through December 31<sup>st</sup> for NEW YORK MEDICAL CAREER TRAINING CENTER and must cover all Title IV transactions that have occurred since the previous audit. New York Medical Career Training Center's annual compliance and financial statements audit performed under ED's Audit Guide must be submitted within six months of the end of the school's fiscal year. Refer to 2009-10 FSA Handbook, Vol. 2, Chapter 12 for more in details.

The OIG provides additional information about audits on the following Web site: <http://www.ed.gov/offices/OIG/nonfed/sfa.htm>

### **SECTION B:**

### **STUDENT CONSUMER INFORMATION**

All required consumer information is available to all students through the Student services offices.

### **Completion or Graduation Rates**

The New York Medical Career Training Center annually prepares its completion or graduation rate, and, if applicable, its transfer-out rate, and make these rates available to any enrolled or prospective student, on request. The Office of Academic Affairs prepares this report with all applicable rates and disseminates them through annual publication. The financial aid officer will create annual reports based on the financial assistant each award year with the assistant of office record managers and teachers in the acquiring student date.

### **Retention Rates:**

The institution must have available to all prospective and current students the retention rates of students in a certificate or degree seeking program who are first-time full-time undergraduate students.

### **Placement Rates:**

The institution must have information on placement of and types of employment obtained by graduates of the school's degree and certificate programs.

### **Annual Security Report**

For the Annual Security report, New York Medical Career Training Center is still in process of preparing the report. New York Medical Career Training Center will do the best for Annual Security report ready for students and employees.

Campus security and safety is an important feature of postsecondary education. The Department of Education is committed to assisting schools in providing students nationwide a safe environment in which to learn and to keep student, parents and employees well informed about campus security. These goals were advanced by the Crime Awareness and Campus Security Act of 1990. The Department is committed to ensuring that postsecondary institutions are in full compliance with that Act, and enforcement of the Act is a priority of the Department.

The New York Medical Career Training Center distributes an annual security report by October 1 of each year—including crime statistics and campus policies and procedures regarding security matters—to enrolled students and current employees. The institution ensures that prospective students and

## A Model Financial Aid Policies and Procedures Manual

prospective employees are informed of the availability of the report and given an opportunity to obtain it from the main administrative office. The statistics portion of the report is also submitted to ED, as required.

- ◆ The Director of Campus Safety compiles, maintains, distributes, and the CEO /President submits the crime statistics to ED
- ◆ The Board of Directors constructs and reports the institution's policies regarding campus security
- ◆ The annual security report is disseminated to faculty, staff, students, and the regulatory agencies via official e-mail, campus bulletin board, and official mail.
- ◆ One must request in writing to obtain a free copy of the full published report.

In addition to the required annual campus security report, schools are required to provide a timely warning to the campus community of any occurrences of the following crimes that are reported to campus security authorities or local police and are considered to represent a serious or continuing threat to students and employees. These crimes are: criminal homicide, forcible and non-forcible sex offenses, robbery, aggravated assault, burglary, motor vehicle theft and arson, crimes that show evidence of prejudice, violations of liquor and drug law, illegal weapon possession and persons referred for campus disciplinary action for liquor, drug and weapons law violations.

The annual security report must include the following:

1. The required school crime statistics including
  - a. criminal homicide, including murder and non-negligent manslaughter and negligent manslaughter
  - b. sex offenses including forcible and non-forcible sex offenses
  - c. robbery
  - d. aggravated assault
  - e. burglary
  - f. motor vehicle theft
  - g. arson
  - h. separately by category of prejudice, each crime listed above and any other crime involving bodily injury reported to local police agencies or to a campus security authority that shows evidence or prejudice based on race, gender, religion, sexual orientation, ethnicity or disability.
  - i. Arrests for violations of liquor and drug law violations and illegal weapons possession
  - j. Persons not arrested but referred for campus disciplinary action for liquor, drug and weapons law violations

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2. A statement of current campus policies regarding procedures for reporting crimes and other emergencies occurring on campus and the policies for the school's response to these reports including:
  - a. policies or making timely reports on above crimes to members of the campus community
  - b. policies for preparing the annual disclosure of crime statistics
  - c. list of the titles of each person or organization to whom the criminal offenses described should be reported for the purpose of making timely warning reports and the annual statistical disclosure
3. A statement of the school's policies concerning the security of, and access to, all campus facilities, including residences and security considerations used in the maintenance of campus facilities.
4. Statement of the school's policies concerning campus law enforcement including:
  - a. enforcement authority of campus security personnel, their working relationship with state and local police and other law enforcement agencies and whether the security personnel have the authority to arrest individuals
  - b. policies that encourage accurate and prompt reporting of crimes to campus police and the appropriate police agencies
  - c. procedures that encourage pastoral counselor and professional counselors, to inform clients of any procedures to report crimes on a voluntary, confidential basis for inclusion into annual disclosure of crime statistics.
5. description of type and frequency of programs that
  - a. inform students and employees about campus security procedures
  - b. encourage students and employees to be responsible for their own security and security of others
6. a description of school crime prevention programs
7. statement of policies concerning the monitoring and recording of criminal activity at off-campus locations
8. policies concerning the possession, use and sale of alcoholic beverages including the enforcement of state underage drinking laws
9. statement of school policies concerning the possession, use, and sale of illegal drugs including the enforcement of state and federal drug laws
10. description of the drug and alcohol-abuse education programs available to students and employees
11. statement of sexual assault prevention programs available and procedures to be followed when a sexual offense occurs including:
  - a. description of educational programs to promote awareness of rape and other forcible and non-forcible sex offenses
  - b. procedures a student should follow if a sex offense occurs
  - c. options for the notification of local law enforcement officials and a statement that school personnel will assist student in notifying authorities
  - d. availability of on and off campus counseling, mental health or other student services for victims of sex offenses
  - e. Notice to students that the school will change a victim's academic situations after the alleged sex offense and the options for change, if changes reasonably available.

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- f. Procedures for campus disciplinary action in cases of alleged sex offense including clear statement that both the accuser and accused are entitled to same opportunities to have others present during disciplinary proceeding; will be informed of school's final decision
- g. Sanctions the school may impose following final determination of school disciplinary proceeding regarding rape, acquaintance rape, or other forcible or non-forcible sex offenses
- h. A statement advising the campus community where to find law enforcement agency information concerning registered sex offenders who might be present on campus

**New York Medical Career Training Center  
Campus Security Act Disclosure Statement**

The Campus Security Act (Public Law 102-26) requires postsecondary institutions to disclose the number of instances in which certain specific types of crimes have occurred in any building or on any property owned or controlled by this institution which is used for activities related to the educational purpose of the institution and/or any building or property owned or controlled by student organizations recognized by this institution. In compliance with that law, the following reflects this institutions crime statistics for the period between 1/1/2008 and 12/31/1010 (three most completed calendar years)

Report Distribution Date  
Occurrences Within the 2008, 2009 and 2010 Calendar Years

<b>Crimes Reported</b>	<b>2008</b>	<b>2009</b>	<b>2010</b>	<b>Location: C=Campus N=Non-campus P=Public</b>	<b>*Hate Crime?</b>
Murder (Includes non-negligent manslaughter)	0	0	0		
Negligent manslaughter	0	0	0		
Sex offenses (forcible & non-forcible)	0	0	0		
Robberies	0	0	0		
Aggravated assaults	0	0	0		
Burglaries	0	0	0		
Motor Vehicle Thefts (on Campus)	0	0	0		
Arson	0	0	0		

<b>Number of arrest made for the following crimes</b>	<b>2007</b>	<b>2008</b>	<b>2009</b>	<b>Referred for campus disciplinary action? (Yes)(No)</b>
Liquor Laws	0	0	0	
Drug Laws	0	0	0	
Weapons Possession	0	0	0	

**\*Crimes of murder, manslaughter, arson, forcible rape and aggravated assault that show evidence of prejudice based on race, religion, sexual orientation, ethnicity or disability as prescribed by the Hate Crime Statistical Act.**

1. This institution does not employ campus security personnel but encourages both its employees and students to immediately report suspected criminal activity or other emergencies to the nearest available campus security officer, institutional official and/or in the event of emergency to directly contact local law enforcement or other emergency response agencies by dialing (911).
2. All students and employees are required to report any crime or emergency to their institutional official promptly. If a student or employee wishes to report a crime on a voluntary or confidential basis, the institutional official will be prepared to record and report the crime, but not the name of the informant. The student or employee may, in order to maintain confidentiality, submit the information in writing to his/her institutional official without signature. If the student wishes no to maintain confidentiality, the student will contact his/her teacher or school official who in turn will contact the nearest supervisor to report criminal actions or emergencies to the appropriate agency by calling (911).

Preparation for the Annual Disclosure of Crime Statistics report is obtain by the institution's secretary who contacts the correct police department District for statistics and the institution's "Daily Incident Log", and then records those statistics.

3. Only students, employees and other parties having business with this institution should be on institutional property. Staff, faculty, students, and prospective students or any person entering the premises must have and display at all times a security identification badge. Those without an identification badge must sign in at the entrance and identify their purpose of visit, the person to be visited and register their time in and out of the building. The visitor must also wear a visitor's badge while on campus. All rear access doors leading to the campus are closed and locked during evening hours starting at 5:00pm. When the school closes for the night, the school's official or supervisor will inspect each floor to see that it is empty and then set the alarms on each floor and then lock down the campus. Other individuals present on institutional property at anytime without the express permission of the appropriate institutional official(s) shall be viewed as trespassing and may as such be subject to a fine and/or arrest. In addition, students and employees present on institutional property during periods of non-operation without the express permission of the appropriate institutional official(s) shall also be viewed as trespassing and may also be subject to a fine and/or arrest.
4. Current policies concerning campus law enforcement are as follows:
  - a) Institution's officials have no powers of arrest other than the Citizens Arrest Law, and are required in the event of a crime or emergency to call the correct agency or

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- dial (911) for the police and emergency services. The Citizens Arrest Law will be invoked only as a last resort, and after all other possibilities have been explored.
- b) Employees shall contact their immediate or nearest ranking supervisor to report any criminal action or emergency to the appropriate agency by calling (911). If possible, in the interim, the security guard(s) and or institutional official shall attempt to non-violently deal with the crime or emergency with the appropriate agency on campus. Individual discretion must be used, as undue risk should not be taken.
  - c) The institution currently has no procedures for encouraging or facilitating pastoral or professional counseling (mental health or otherwise), other than the student or employee is encouraged to seek such aid.
5. Though this institution does not offer regularly scheduled crime awareness or prevention programs, students are encouraged to exercise proper care in seeing to his/her own personal safety and the safety of others. The following is a description of policies, rules and programs designed to inform students and employees about the prevention of crimes on campus.
- a) Do not leave personal property in classrooms
  - b) Report to your institutional official, any suspicious persons.
  - c) Always try to walk in groups outside the school premises.
  - d) If you are waiting for a ride, wait within sight of other people
  - e) Employees (staff and faculty) will close and lock all doors, windows and blinds and turn off lights when leaving a room.
  - f) The “Crime Awareness and Campus Security Act” is available upon request to students, employees (staff and faculty) and prospective students.
  - g) The School has no formal program, other than orientation, that disseminates this information. All information is available on request.
  - h) Information regarding any crimes committed on the campus or leased/attached properties (parking lot) will be available and posted in a conspicuous place within two (2) business days after the reporting of the crime and be available for sixty (60) business days during normal business hours, unless the disclosure is prohibited by law, would jeopardize the confidentiality of the victim, or an ongoing criminal investigation the safety of an individual, cause a suspect to flee evade detection: or result in the destruction of evidence. Once the reason for the lack of disclosure is no longer in force, the institution must disclose the information. If there is a request for information that is older than sixty 60 days, that information must be made available within two (2) business days of the request.
6. The institution does not offer regularly scheduled crime awareness or prevention programs other than orientation where all the institution’s policies and regulations are properly disclosed to prospective students.
7. All incidents shall be recorded in the NEW YORK MEDICAL CAREER TRAINING CENTER daily Incident Log located on campus at the director’s office. The log includes the date, time, location, incident reported, and disposition of incident and the name of the person who took the report. The report must be entered in the log with two (2) business days after it is reported to the school’s official, unless that disclosure is prohibited by law, would endanger the confidentiality of the victim.

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8. This institution does not permit the sale, possession or consumption of alcoholic beverages on school property and adheres to and enforces all state underage-drinking laws.
9. The institution does not permit the possession, use or sale of illegal drugs by its employees and students and adheres to and enforces all state and Federal drug laws. The violations of these policies by students or employees may result in expulsion, termination and/or arrest.
10. Sexual assaults (criminal offences) on campus will be reported immediately to school director Dr. Nand, who will report it to (911) emergency and police units. The person who was victimized will be encouraged to seek counseling at a rape crisis center and to maintain all physical evidence until such a time as that person can be properly transported to a hospital or rape crisis center for proper treatment. This institution has zero tolerance of such assault; the violation of this policy by students or employees may result in expulsion, while investigations are being followed, termination and/or arrest.

Students and employees should refer to the following person or agency when reporting or seeking help on a criminal incident. Please note that any emergency that requires immediate attention should not be waited upon on to report to the school's officer but rather contact the appropriate agency by calling (911).

Dr.Nand Panjwani

36-09 Main St. 5<sup>th</sup> Fl Flushing NY 11354

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### **Data on Campus Crime**

- ◆ Parents and students can now use the Internet to review campus crime statistics for NEW YORK MEDICAL CAREER TRAINING CENTER campus online. through the following website:  
<http://ope.ed.gov/security/search.asp>

The data are presented in four parts:

- Arrests
- Criminal Offenses
- Hate Crimes
- Disciplines

### **State-Required Consumer Information**

The office of financial aid is responsible to make all state required information available to all prospective and current students. Yearly review is done to update and include all current regulation and fulfill state requirements in disseminating information.

### **Federal Student Consumer Information Requirements**

New York Medical Career Training Center provides financial aid in the form of grants, and educational loans to approximately \_\_90\_\_ percent of its student body annually. The application process begins when students complete and submit the Free Application for Federal Student Aid (FAFSA). The FAFSAs are then mailed to ECM to submit to CPS electronically. When the school receives ISIR, then it determines eligibility for students using a combination of programs in an attempt to both reward academic achievement and meet their demonstrated financial needs based on a federally mandated formula of:

### **Accrediting Agency Consumer Information**

The office of financial aid is responsible to make all accrediting agency required information available to all prospective and current students. Yearly review is done to update and include all current regulation and fulfill the agency requirements in disseminating information.

### **Annual Fire Safety Report:**

New York Medical Career Training Center does not maintain any on-campus student housing; and so is not required to prepare an Annual Fire Safety Report.

### **General Disclosures:**

New York Medical Career Training Center makes the following information available to all prospective and current students:

- The retention rate as reported to IPEDS.
- The placement of, and types of employment obtained by, graduates of New York Medical Career Training Center.

### **Student Aid Policy and Procedures for Sending and Receiving Sensitive Documents and Media Using Land Shipment Methods**

Due to a history of damaged/ripped packages shipped via private carriers and the U.S. Mail, Federal Student Aid has implemented additional safeguards related to data exchanged between Federal Student Aid and our data exchange partners.

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### Policy and Procedures:

1. All tapes that are "Returned Tapes" shall be degaussed or erased fully prior to shipping.
2. All sensitive documents and media shall be double packaged in opaque materials that are approved by the shipping agent. (DHL, FedEx, UPS, etc)
3. The receiver may return an undamaged package if sent in a single package. Damaged packages (single or double packages) shall not be returned.
4. Both the "To" and "From" addresses shall be included on both inner and outer packages
5. Shipping agents shall have the capability of tracking the shipment's status
6. Shipments shall require signatures upon receipt.
7. Packages shall not identify the sensitivity of the contents.
8. Shipments shall include a manifest inside the package. The receiver shall validate the package contents against the manifest: (1) immediately upon receipt of a damaged package, or a package suspected of being compromised; (2) within one business day of receipt for a package that does not fit within (1)
9. Manifests that include sensitive information that do not match contents of the package shall be immediately reported to the sender, the carrier, the system Security Officer, Federal Student Aid's Computer Security Officer and the Department of Education's Incident Handling Coordinator. Do not return the package.
10. This policy shall be provided to all parties that send or receive sensitive Federal Student Aid documents or media.
11. If any portion of this policy cannot be complied with by any party, that party shall notify the Federal Student Aid Computer Security Officer by email, identifying what cannot be complied with and why.

### **Type of Software Application:**

The Financial Aid Office uses EDE Express software to connect to the website which is used to enter and transmit the FAFSAs to the Central Processor, and to receive back the ISIRS. The institution uses ECM as our third party processor. The institution will provide ECM with copies of the FAFSAs and ECM will enter the information and transmit the FAFSAs. ECM will receive back the ISIRs and either emails them to the institution or prints them and mails them to the institution.

ECM, the third party processor, uses EDE Express is used to originate Pell and Loan records which are then sent to the Central Processor. Through the Web ECM connects to COD which receives the EDE express records. ECM also connects to G5 to enter expected payments and requests payments.

ECM, the third party processor uses File Pro as a system to enter all aid per student and the information from File Pro is now transmitted to COD. This is a new process which will eliminate EDE express which is now used for this purpose.

File Pro is used for reconciliation to be sure the COD information matches the File Pro information.

ECM does a nightly backup of the system

Before ECM sends via email or the web any information to the institution it is password protected to protect the student and the institution.

The institution uses DELL Window 7 computer system to keep track of the financial aid and disbursements for each student. The student is packaged and receives an award letter. Monthly reconciliations compare the information in the institution to the information in the ECM system. Any discrepancies are handled immediately.

The institution's Window 7 system is backed up nightly.

Any information sent to ECM is password protected.

### **Emergency Evacuation Procedures:**

The Office of Student Affairs has set up an e-mail group that will reach all current students, faculty and administration to inform them of any emergency on campus. The Office of Student Affairs will be responsible to update this e-mail group as changes in student, faculty and administration occur. In addition, a text message will be sent to students, faculty and administrators. The Office of Student Affairs will be responsible to update this system as needed. On specified days, the system will be checked each year. The evacuation plan is the same as the fire evacuation plan which is posted throughout the building. All personnel will be advised of this plan each year.

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### **Reproduction of Copyrighted Works**

The making of an electronic or paper copy of a copyrighted work by any means (photocopying, electronic reproduction, scanning, digitizing, etc.) constitutes reproduction that is governed by copyright law. The copyright principles that apply to the use of copyrighted works in electronic environments are the same as those that apply to such use in paper environments.

The reproduction or copying of a work subject to copyright protection typically requires the permission of the copyright owner. However, the copyright law recognizes that in certain situations, copyrighted work may be reproduced without the copyright owner's consent. One such situation is where the doctrine of "fair use" applies.

The following four factors must be considered for determining "fair use"

- The purpose and character of the use, including whether such use is of a commercial nature or is for nonprofit educational purposes.
- The nature of the copyrighted work

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- The amount and substantiality of the portion used in relation to the copyrighted work
- The effect of the use upon the potential market for or value of the copyrighted work.

The school distributes materials informing the community about the appropriate use of copyrighted materials. This information is included in the student catalog, codes of conduct, in addition to e-mail and/or paper disclosures.

Any unauthorized distribution of copyrighted materials will be handled by the Dean of the school and a disciplinary hearing may be called.

The school presently has installed on its computer server “Watchdog Software”, which monitors the traffic of computer usage. The software also restricts access to only those websites which are on a “safe list”. In addition, it prohibits the users from downloading restricted information without the consent of the administrators in charge of the program.

The Academic committee reviews the effectiveness of the plan to combat the unauthorized distribution of copyrighted materials on an outcome basis. A check of a “before and after” comparison of bandwidth, or relapsing into previous problem situations is a way to check on outcomes.

The institution provides an annual notice on a one-to-one basis through a direct notice to each enrolled student. Any student involved in a copyright situation will be referred to the Dean and the proper authorities.

### **Summary of Civil and Criminal Penalties for Violation of Federal Copyright Laws:**

Copyright infringement is the act of exercising, without permission or legal authority, one or more of the exclusive rights granted to the copyright owner under section 106 of the Copyright Act (Title 17 of the United States Code). These rights include the right to reproduce or distribute a copyrighted work. In the file-sharing context, downloading or uploading substantial parts of a copyrighted work without authority constitutes an infringement.

Penalties for copyright infringement include civil and criminal penalties. In general, anyone found liable for civil copyright infringement may be ordered to pay either actual damages or “statutory” damages affixed at not less than \$750 and not more than \$30,000 per work infringed. For “willful” infringement, a court may award up to \$150,000 per work infringed. A court can, in its discretion, also assess costs and attorneys’ fees. For details see title 17, United States Code, Sections 504 and 505.

Willful copyright infringement can also result in criminal penalties, including imprisonment of up to five years and fines of up to \$250,000 per offense.

For more information, please see the Web site of the U.S. Copyright Office at [www.copyright.gov](http://www.copyright.gov), especially their FAQ's at [www.copyright.gov/help/faq](http://www.copyright.gov/help/faq).

**Textbook Information:**

The institution has, on its internet course schedule, the International Standard Book Number (ISBN) and retail price for required and recommended textbooks and supplemental material. If the ISBN is not available, the author, title, publisher and copyright date, or, if such disclosure is not practicable, the designation "To be Determined"

The institution will include on the written course schedule a reference to the textbook information available on its internet schedule and the internet address for that schedule

**SECTION C:**

**FINANCIAL AID PROGRAM INFORMATION**

**Institutional Eligibility Requirements:**

New York Medical Career Training Center is a Postsecondary vocational institution.

This documentation is available to all enrolled and prospective students upon request. The New York Medical Career Training Center is a proprietary institution of higher education eligible to participate in the Title IV programs. A copy of the Program Participation Agreement, Eligibility and Certification Approval Report, accrediting agency letters, state authorization and licensure documents are displayed and available for inspection in the Office of School Director for all enrolled and prospective students and families.

The Director of Financial Aid and the CEO/President track the expiration of PPA and coordinate the recertification process with ECM our third party service provider. NEW YORK MEDICAL CAREER TRAINING CENTER communicates and coordinates with ECM which is responsible to update ECAR by submitting Electronic Application to the ED for any change in the institution that requires a notification to accrediting agencies, state and federal department of education. Internal programs reviews, compliance audits by the independent financial auditors, third party service provider's program review and audits are routinely conducted to insure Title IV compliance and institutional eligibility is in good standing at all times.

ECM, our third party servicer, identifies the expiration date of the PPA and notifies New York Medical Career Training Center 2-3 months before the due date to update the

PPA. Several reminders are received by New York Medical Career Training Center before the actual expiration date.

### **Program Eligibility**

The New York Medical Career Training Center offers the following programs that are eligible for Title IV aid. Medical Assistant is eligible to participate in the Federal student financial assistance

### **Ineligible Programs**

Medical Billing, EKG & Phlebotomy, Nurse Aid/Assistant, Pharmacy Technician and Patient Care Technician Program are not eligible to participate in the Federal student financial assistance.

### **Evaluation of New Programs**

All new programs are evaluated and must meet the following criteria in order to be considered as Title IV aid eligible programs.

- Meet minimum clock hours and time requirement
- Approved by a Department of Education-recognized accrediting agency
- Approved by the state agency

Only then the new programs upon meeting ED's requirements and obtaining ED's approval are included in the PPA and ECAR.

### **Division of Responsibilities:**

The Director of Financial Aid has the responsibility to update PPA, to keep the Policies and Procedures manual up to date and to prepare all necessary reports with regard to Financial Aid to the Department of Education.

The Financial Aid Office has the responsibility to administer the Title IV programs. The Office deals with the students, makes them aware of the aid available, packages the students with Title IV aid, and requests the Financial Aid through the Third Party Servicer. The Accounting Office has the responsibility of releasing the funds onto the student's account and making whatever refunds are necessary.

### **Electronic Processes:**

New York Medical Career Training Center complies with the FTC standards for safeguarding customer information. The school's risk assessment includes

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employee training and management; information systems, including network and software design as well as information processing, storage, transmission and disposal and detecting, preventing and responding to attacks, intrusions or other systems failures.

New York Medical Career Training Center has implemented information safeguards and adjusts its information security program in light of the results of the required testing and monitoring.

### **Cohort Default Rate:**

The Cohort Default rate for New York Medical Career Training Center is the percentage of the federal student loan borrowers who enter repayment within the cohort fiscal year divided by those who default before the end of the following fiscal year. Beginning FY 2009 there is a three year school CDR calculation (this is increased from two years). The Federal Government will provide yearly the cohort default rates for the school.

Numerator – number of borrowers who default within a cohort Period

Denominator: number of borrowers who enter repayment within a cohort period

Example:

$$\frac{\text{FY 09} \quad \text{FY 10} \quad \text{FY 11}}{125 \quad 230 \quad 250 = 605} = \frac{605}{5000} = .121 \text{ or } 12.1\%$$

Two sets of draft and official cohort default rates will be issued annually for fiscal years 2009, 2010 and 2011.

Congress created a transition period during which “no schools sanctions will be taken based on the 3 year calculated rate until after there have been three consecutive cohort years of such rates calculated”. (2012)

Effective 2010, HEOA requires schools with a CDR equal to or greater than 30% to establish a default prevention task force which prepares a default prevention plan:

- To identify the factors causing the school’s CDR to exceed the threshold
- To establish measurable objectives and identify steps to take to improve the school’s CDR.
- To specify action the school will take to improve student loan repayment, including loan repayment counseling.

A school whose CDR rate for each of the three most recent fiscal years that data is available, is less than 15%, may disburse a DL in one installment. Also

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the school is not required to delay delivery of the first disbursement of a loan to a first year, undergraduate student (the 30-day delay rule).

Schools participating in the Federal Stafford Loan Program for the first time, or schools that have had a change of ownership that resulted in a change in control are required to use a default prevention and management plan to participate in the Title IV programs.

NEW YORK MEDICAL CAREER TRAINING CENTER participates in following nine Default Prevention and Management Activities:

1. Entrance Counseling: Requires first time borrowers to have explanations of how the master promissory note works, that the loan must be repaid, the consequences of default and be shown sample monthly repayment amounts. The school will collect as much contact information as possible to facilitate future contact if needed.
2. Financial Literacy for Borrowers: The school will offer the student written information on their loans, how to manage debt, etc. The following will be provided at entrance and exit interviews:
  - a. estimate of required monthly payments on loan balance
  - b. calculations to help estimate and manage debt
  - c. Loan servicer contact information
  - d. Contact information for delinquency and default prevention assistance on campus
  - e. Introduction to NSLDS for students
  - f. "Repaying Your Student Loans" publication
3. Communication throughout the Campus: The school will review its communication among departments to determine a student's academic progress, attendance, enrollment status, etc. The Financial Aid Director will try to ensure all departments are involved.
4. Exit Counseling: The school will comply with Federal Regulations and hold exit interviews. Explanation of payment plans and choices that fit the borrowers' needs is essential. The exit interview will attempt to clear up any misconceptions that the student may have regarding the loan. Students, who withdraw, rather than graduate, must also complete exit interviews. These students have the highest risk of default and every effort must be made to reach these students.
5. Timely and Accurate Enrollment Reporting: Completing the Student Status Confirmation Report (SSCR) accurately and completely on current students and returning this to ECM within the time allotted is the most important. This will ensure the student data is accurate, and that end dates are good for exit interviews.
6. NSLDS Date Entered Repayment Report: The SSCR also handles students who have left school. This assures that student status is correct and that student enter the correct cohort year that schools receive accurate cohort default rates.
7. Late Stage Delinquency Assistance: When notified that students are more than 240 but less than 361 days delinquent the school will make

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every effort to contact these students and inform them of their delinquency.

8. Loan Record Detail Report (LRDR) Data Review: NEW YORK MEDICAL CAREER TRAINING CENTER reviews its LRDR and challenges any incorrect data on this report if found.
9. Analyze Defaulted Loan Data to Identify Defaulter Characteristics: NEW YORK MEDICAL CAREER TRAINING CENTER gathers information to discern who is defaulting and why. NEW YORK MEDICAL CAREER TRAINING CENTER uses this information to improve its default prevention.

### **Student Status Confirmation Report (SSCR):**

The third-party servicer receives electronically, the Student Status Confirmation report. This is then emailed to the institution to be completed and returned to ECM within the thirty day timeframe given by the Feds. The institution must mark each student listed on the report with the proper code indicating the student's status at the institution.

This report is sent to the institution every other month and must be completed and returned to ECM for submission to the Secretary.

### **SECTION D:**

#### **REPORTING AND RECONCILIATION:**

##### **Financial Responsibility**

New York Medical Career Training Center receives a yearly visit by ECM to review Financial Aid Files, Student Accounts and Academic Records. The school is also audited annually by an independent outside auditor to review files and assure compliance with all Federal regulations.

##### **Program Financial Statements:**

The Accounting Office records the receipt and expenditure of title IV funds in accordance with generally accepted accounting principles. All bank accounts are reconciled monthly, including title IV bank accounts. Internal records and records from the third-party servicer are reconciled by the Financial Aid Staff and the Accounting Office in conjunction with ECM.

Each general ledger account is set up to distinguish the Federal Programs and reconciled with the internal accounting system and the Federal transactions.

## **Reconciliation of Title IV**

Reconciliation of all title IV funds will be done on a monthly basis. The institution will request from ECM a report from the Federal Processor which will be compared to the accounting records. Any discrepancies will be resolved as soon as possible. ECM also conducts monthly reconciliations of title IV aid with the funds transmitted to the institution.

## **Reporting & Reconciliation**

NEW YORK MEDICAL CAREER TRAINING CENTER must reconcile the students' accounts with the money drawn down from the Federal Government for Pell, and Federal Stafford Subsidized and Unsubsidized loans. ECM provides Pell and Loan Disbursement reports and individual student awards notifications which will help in the reporting and reconciliation aspects of NEW YORK MEDICAL CAREER TRAINING CENTER statutory obligations.

## **Preparation for Reconciliation:**

The Federal Government informs the institution approximately three months before the E-app is due to be completed and forwarded to the Federal Government. In addition ECM, the Third-Party Processor reminds the institution 10 weeks before the submission is due. ECM forwards a copy of the E-App to the institution, for the institution to review, change and update all information contained in the application. ECM reminds the institution that licenses and state approval of programs will be needed for this application.

## **Responsible Parties:**

The Financial Aid Director is responsible to complete the E-App and forward it to the necessary parties to have it reviewed and signed. The Financial Aid Director will deal with ECM, provide ECM with updates and corrections and review the final copy before submission.

The Financial Aid Director will also be responsible to obtain a password from the Feds for NSLDS. Each applicant to the institution will be reviewed in NSLDS to be sure he/she is not in default and does not owe a refund on Title IV funds. The Financial Aid Director will also update the Student Status Confirmation Report which will be sent by EC M every other month.

## **Copies of E-app**

ECM sends the institution an electronic copy of the E-App, the signature pages and once completed a copy of the submission page. These are kept both by ECM and the institution in an electronic format. Since each system is backed up nightly, the procedure is safe.

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Once the E-app is approved by the Feds, the ECAR is sent to the institution to be signed and returned.

Any changes that occur at the institution such as: change in the name of the school, a new location, the name of the CEO, CFO or Financial Aid Director changes, if the school switches from clock hours to credit hours, closure of a location, addition of a third party servicer or ATB tester, must be reported as a change to the E-App as soon as the change occurs.

### **National Student Loan Data System**

ECM provides information to New York Medical Career Training Center concerning the directions on how to sign up for NSLDS. Personal information must be provided to NSLDS in order to sign on. NEW YORK MEDICAL CAREER TRAINING CENTER uses this information to obtain information on defaulted loan status or owed grant repayments before the student enrolls. NEW YORK MEDICAL CAREER TRAINING CENTER also enters Pell overpayments into the NSLDS system.

NSLDS passwords are individual and not shared among the staff. NSLDS printouts do not show complete social security numbers and pages are placed in the student file as needed.

### **SECTION E:**

#### **APPLICATION PROCESS:**

Prospective students and families can visit the school, or speak to our Office of Admission staff members. Application forms are available in the office. The New York Medical Career Training Center admits as regular students only persons who have graduated from a school providing secondary high school education, or the equivalent (GED), or admits as regular students, persons who are beyond the age of compulsory school attendance, and have the ability to benefit from the training offered by the school. For students who do not have graduated from high school or met the equivalent requirement (GED), the school will have administered by a private tester, a test which is approved by the US Department of Education for this purpose. A signed statement is acceptable for foreign high school graduate who otherwise cannot provide a copy of the diploma due to circumstances beyond student's control.

The Free Application for Federal Student Aid (FAFSA) is the only required application. The federal formula is used to determine eligibility for financial aid, but students must reapply each year they are seeking assistance.

The Office of Financial Aid provides assistance to students and parents in completing the FAFSA form. The complete FAFSA application and a valid ISIR

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serve as the basis for financial aid package for all qualified students. If requested by student and parent, the school submits the FAFSA electronically via ED Express, or the ECM Access to the CPS Online.

A FAFSA must be received by Federal Student Aid Programs by June 30 of the current academic year for it to be processed; however, your application information must be received the latest by New York Medical Career Training Center by your last date of attendance.

ISIRs are reviewed as they are received by the school from ECM. The school contacts students and collects relevant documents to resolve any or all conflicting information and ensures completeness of the application. Similar steps are taken when students submit paper Student Aid Reports (SARs) or SAR Acknowledgements. It is checked to ensure that the school is named on the FAFSA. The financial aid office staffs add the school to the list to ensure the school receives Institutional Student Information Reports (ISIRs) electronically via EDEExpress, or the ECM Access to the CPS Online.

If unusual circumstances are identified during the application process, the school follows guidelines as prescribed in the Professional Judgment section of the manual.

### **Deadlines**

The Federal deadline for submission of the Free Application for Federal Student Aid (FAFSA) is June 30 of the current year.

The last date by which federal loans can be processed to ensure compliance with cash management regulations and guaranty agency rules is June 30 for the current aid year.

Deadlines for submission of verification worksheets, relevant income verification documents and various comment code clearance documentation, etc. may vary. Students must speak to staff members in the financial aid to find the required deadlines. Students are also informed of deadlines by telephone calls, emails, general letters and financial aid bulleting board displayed in the reception area of the financial aid office.

### **Document Collection & Tracking**

Students are informed of required documents when ISIRS are received and reviewed for accuracy and completeness. The office of financial aid monitors and follows up with those students who are yet to submit required documentations.

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All required documents properly signed are submitted to the office of financial aid. The staff members are assigned to complete review of the documents, take appropriate actions and file.

Incomplete documents are returned to student for resubmission in completeness indicating and explaining what additional documents are required. The Director of Financial Aid is responsible to oversee all these processes.

### **Pre-Award Appeals**

The New York Medical Career Training Center does not have any provision for pre-award appeals. However refer to the Professional Judgment section of the manual that indicates institutional policy when a student requests the school to review student's family income situation, extenuating circumstances and other circumstances that may affect student's eligibility for Title IV aid.

If a dependent student who is not otherwise independent according to FAFSA questions, wish to apply for financial aid as an independent student based on exceptional circumstances, may use the 'Dependency Status Appeal Form' to file an appeal. The Director of Financial Aid reviews the appeal and all supporting documents and makes the final determination of the status. The student is notified in writing of the outcome of the appeal process and the final decision. Filing an appeal does not guarantee a change in status. The director's decision is final and cannot be appealed to the Department of Education.

In order to complete the appeal, student must provide a signed and dated written statement that describes the life events that led up to his/her current separation from the family. A 'Monthly Income and Expense Worksheet' form must be completed to provide resource and financial information as a vital part of the appeal. Student must also provide separate statements form at least two adult professionals who are not family members that can verify the family circumstances that student described in his/her appeal and personal statement. All statements must be originals NOT photocopies.

### **File Review**

Reviewing a student's file often involves more than just the verification process. In addition to verification, the financial aid staff members must review an applicant's file for database matches; reject codes, and "C" codes. The financial aid staff members must also review a student's file for other need analysis data elements that are not included in the federally required verification process but are designated as necessary verification data elements by the school. Any inconsistent information must be reviewed and updated as needed. Schools must also review subsequent ISIR records for changes that may impact the applicant's aid eligibility. For these reasons, verification is considered under the broader process of file review. For more information please refer to 2010-11 *FSA Handbook*, Application and Verification Guide.

### **Independent Student Status:**

You will be considered independent if you are:

- 24 years of age or older on or before December 31st of the award year
- a veteran of the U.S. Armed Forces
- currently serving on active duty in the U.S. Armed Forces for purposes other than training
- accepted and enrolled in a graduate/professional program
- At any time since you turned age 13, were both your parents deceased, were you in foster care or were you a dependent or ward of the court?
- Are you an emancipated minor, as determined by a court in your state of legal residence?
- Are you or were you in legal guardianship as determined by a court in your state of legal residence?
- Have children who will receive more than half of their support from you between July 1, 2010 and June 30, 2011.
- Has a dependent (other than children or spouse) who live with you and who receive more than half their support from you now and through June 30, 2011.
- married
- At any time, on or after July 1, 2009 did your high school or school district homeless liaison determine that you were an unaccompanied youth who was homeless?
- At any time, on or after July 1, 2009, did the director of an emergency shelter or transitional housing program, funded by the U.S. Department of Housing and Urban Development determine that you were an unaccompanied youth who was homeless?
- At any time on or after July 1, 2009, did the director of a runaway or homeless youth basic center or transitional living program determine that you were an unaccompanied youth who was homeless or were self supporting and at risk of being homeless.

### **Student Financial Aid Eligibility Requirements:**

To receive title IV financial aid the student must:

- Be enrolled as a regular student in an eligible program

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- Not be enrolled simultaneously in secondary school
- Have a valid social security number
- Be a U.S. citizen or eligible noncitizen
- Be registered with Selective Service, if required
- Sign a statement of Educational Purpose which certifies he or she will use federal student financial aid only to pay educational costs
- Not be in default on a Title IV loan, or if in default, have made satisfactory repayment arrangements.
- Have not obtained loan amounts that exceed annual or aggregate loan limits.
- Meet one of the following academic criteria:
  1. Have a high school diploma or its recognized equivalent
  2. Have a passing score on an approved ability-to-benefit test
  3. Have met the requirements of the State for a home schooled student
- Not have been convicted of an offense involving the possession or sale of illegal drugs that occurred while the student was enrolled and receiving Title IV aid.
- Be making satisfactory academic progress

All students who wish to apply for Federal Financial Aid must complete the Free Application for Federal Student Aid. As a result of completing this application and forwarding it to the Federal processor, the student will receive an ISIR which has an EFC (Expected Family Contribution) in the upper right hand corner of the first page.

### **Need-Based Awards:**

Eligibility for need-based financial aid is based on a need analysis. A formula established by Congress is applied to the information you provide on your application resulting in an expected family contribution (EFC). The difference between the budget; i.e. the annual costs of attending school (COA), and the EFC is your need (COA-EFC=Need).

### **Financial Aid Programs:**

**APPLICATION:** All financial aid is applied for by completing the FAFSA. The Office of Student Financial Aid will assist with this process. Please contact them for assistance.

## **GRANTS**

**FEDERAL PELL GRANTS:** A Pell Grant is considered to be the first source of aid to the student and packaging begins with Pell eligibility.

A student must be enrolled in an undergraduate course of study to receive a Pell grant. A student who has earned a baccalaureate degree is not considered an undergraduate and cannot receive a Pell grant.

The amount of a Pell grant is determined by the student's EFC on the ISIR, and the Cost of Attendance at an institution. The Pell schedule for 2010-2011 is included in this chapter. The Pell grant maximum award for the 2010-2011 year is \$5,550.

A Pell grant must be prorated if the student attends less than 900 hours in a year. Included in this chapter are the rules for proration.

### **Year-Round Pell:**

As a result of Reauthorization, and effective July 1, 2009, students, who accelerate progress toward their degree completion, are now eligible for Year-Round Pell Grants. Students may now receive up to two full scheduled Pell Grants during any given Award Year. To qualify, students must be enrolled at least half time for more than one academic year during a single award year and be enrolled in an associate, baccalaureate degree or certificate program.

For instance, in the 2010-2011 Award Year the maximum Pell Grant will be \$5,550. However, with Year-Round Pell, if a student is able to enter into two academic years within the 10-11 Award Year, the student would qualify for up to \$11,100 in Pell.

Although this scenario may not occur very often, it will help many "cross-over" students that previously may have lost a Pell payment due to a payment period not crossing July 1<sup>st</sup> into the next award year. Now a student will be eligible for their next Pell payment when they begin their payment period, even if they have already received the maximum Pell award for the given Award Year.

### **Clock Hour Year-Round Pell Grant**

New Rule: Up to two scheduled awards per Award Year

1500 clock hour program: AY = 900 Hours/26 weeks

Student's scheduled award is \$4,000 for the 09-10 award year

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July – Sept
450 Hours - 13 weeks
\$2,000

Oct – Dec
450 hours – 13 weeks
\$2,000

Jan – Feb
300 hours – 8 weeks
\$1,333

Mar – Apr
300 hours – 8 weeks
\$1,333

.A student is eligible for a second scheduled award if the student is enrolled for any credit or clock hours attributable to the student's second academic year in the current award year and is enrolled at least half-time.

For transfer students, the credit or clock hours that they have earned at the prior institution during the award year are based on the disbursements they received at the other school in proportion to the scheduled award at the other school.

Payment periods in two award years (Cross-Over Payments) – for students who are enrolled as either  $\frac{3}{4}$  or full-time students, the school must schedule the payment period for potential cross over payments in the award year where the student would receive the greater payment. If the school subsequently receives information that the student would receive a greater award in either year, the school is required to reassign the payment to the award year with the higher payment.

For students who are less than  $\frac{3}{4}$  time ( $\frac{1}{2}$  time or less than  $\frac{1}{2}$  time): if the student requests that the award year with the higher payment be used, the school must choose the payment that is higher.

### **Year Round Pell:**

A school is required to have a written policy on how it will determine to which award year a student's cross-over payment period will be assigned.

The school's written policy must be developed prior to July 1, 2010, or regulations apply.

The policy may provide:

- Award all students from 2009-2010, if eligible.
- Award all students from 2010-2011 if eligible.

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- Award on a student by student basis.

2009-2010 Cross-Over Transition: For most flexibility set the Pell cross-over term policy before July 1, 2010.

- Policy may provide for awarding students from 2009-2010 in which case you do not have to review 2010 ISIRS and there is no review of academic year progression for 2009-2010.
- Policy may provide for awarding students from 2010-2011 – in which case rules apply so:
  1. The student must be paid the higher of 2009-2010 or 2010-2011 award.
  2. If 2009-2010, acceleration rule does not apply unless school's policy calls for it.
  3. If 2010-2011, acceleration rule is not applicable since this would not be second Scheduled award.

Policy established on or after July 1, 2010-11

- Rules apply for both years
- Must pay higher of student's 2009-2010 award
- If 2009-2010, acceleration rule applies regardless of school's policy.
- If student has not progressed to next academic year, student not eligible for 2009-2010 award, therefore pay Pell from 2010-2011 if eligible.

Packaging:

May use different award year for Pell than for other Title IV aid.

- For Pell use award year from which payment will be made for
  1. EFC
  2. COA
  3. COD reporting
- EFC and COA for all other Title IV programs can be from the other year but must be the same for those programs.
- Amount of Pell is EFA for other aid.

Acceleration:

- At least one credit or clock hour in the payment period when award will be from a second Scheduled Award must be attributable to the student's next academic year.
- Not "grade progression"
- Must be applied for any required recalculation
- Gives meaning to statutory use of term "accelerate"

Credit or Clock Hours not Applicable to Acceleration  
Created by ECM /91

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In determining if student is in second academic year, you may not count credit/clock hours earned through

- Advanced placement
- International Baccalaureate
- Testing Out
- Life experience
- Other similar competency measures

Remedial credits DO count.

Acceleration

- Applies beginning with 2010-2011 Award Year
  1. Cross-over period payment award from upcoming year does not require counting hours because payment will be from first Scheduled Award.
  2. Hours earned in Summer 2010 count toward acceleration later in 2010-2011 award year.

Transfer Students:

If student received 100% of the first scheduled award at prior school(s), assume student completed first academic year.

If student received less than 100% use the same ratio to the receiving school's academic year as the % of the scheduled award that was received from the other school(s). Round up. Receiving school may use actual hours earned at prior school(s).

1. Credits do not have to transfer to new school
2. Not related to academic program.

### **Maximum Duration of Pell Eligibility:**

As a result of Reauthorization, and effective July 1, 2008, the maximum Pell eligibility of a student is limited to 18 semesters, or its equivalent. This means that students will be limited to receive a maximum of nine Pell Grant scheduled awards in their lifetime. However, this new rule applies only to students who are first-time Pell recipients in the 2008-2009 Award Year or after. The Department will begin tracking this eligibility limitation within the NSLDS reporting system.

### **Maximum Pell for Children of Soldiers who Died:**

As a result of Reauthorization and effective July 1, 2009, children of soldiers who died as a result of military service in Iraq or Afghanistan after 9/11/2001, provided the student is less than 24 years of age or enrolled as a student at an

institution of higher education at the time of the parent or guardian's death, will receive the maximum Pell Grant, provided they are otherwise Pell eligible.

The student must provide VA and Department of Defense documentation to the Department of Education.

**Iraq and Afghanistan Service Grants:**

Students who are not Pell eligible and had a parent or guardian who died as a result of service in Iraq or Afghanistan after September 11, 2001 may be eligible for an Iraq and Afghanistan Service grant equivalent to the maximum Federal Pell Grant. The 2010-2011 ISIRS of eligible students will include the new "DoD Match Flag," associated with comment code 298, and the parent or guardian's date of death. This will allow the school to identify the students.

\*Note: A student cannot have both a Pell Grant award and an Iraq and Afghanistan Service Grant from the same school in the same award year.

**LOANS**

**FEDERAL SUBSIDIZED DIRECT LOANS:**

Federal Subsidized Direct Loans are need-based full amount or prorated loans made available to students by the Department of Education. The maximum amount students can borrow each year is based on their enrollment levels in school. For example, a student can borrow up to \$3,500. The Subsidized Stafford aggregate loan limit for students enrolled in undergraduate programs of study is \$23,000. Subsidized Stafford Loans current interest rate is a fixed rate of 4.5 percent, for 2010-2011. All students must complete Master Promissory Notes (MPN). Repayment begins six months after students, graduate, cease enrollment, or drop below half-time enrollment status.

**FEDERAL UNSUBSIDIZED DIRECT LOANS:**

Unsubsidized Stafford Loans are not based strictly on demonstrated need. A Dependent student whose parents can borrow a PLUS loan may borrow \$2,000 in Unsubsidized loans each year. Independent undergraduate students and dependent students under certain conditions can borrow \$6000 in this program. The interest rate is fixed at 6.8 percent. Interest accrues and can compound on this type of loan. Repayment begins at disbursement unless you tell your lender to capitalize the interest on your loan. Dependent students can

receive a combination of Unsubsidized and Subsidized Stafford Loans but not to exceed in aggregate \$31,000. An independent student can receive a combination of Unsubsidized and Subsidized Stafford Loans but not to exceed in aggregate \$57,500.

**FEDERAL PARENT LOANS FOR UNDERGRADUATE STUDENTS (PLUS):**

PLUS loans are fixed rate loans made available to the parents of dependent undergraduate students to assist with educational expenses. The maximum amounts that parents can borrow are equal to XYZ's cost of attendance minus other aid their students are receiving. These loans require credit checks and repayment of both principal and interest, beginning 60 days after the final disbursement is made. Parents must complete a Master Promissory Note (MPN). This loan also has a fixed interest rate at 7.9 percent. A parent may apply to delay repayment until the student graduates or withdraws from school; however the interest is capitalized.

**Title IV Loan Counseling:**

Each student who applies for a Federal Direct Student Loan will be required to complete an entrance interview. The student must read, complete and sign the required form. When possible the interview will be held in person and any questions will be addressed. The Financial Aid Office will address the responsibilities of the borrower and the problems the student will experience if the loan is not paid back.

Entrance counseling may also be held on the Direct Loan Website, where the student may read and complete the counseling. New York Medical Career Training Center has access to the website to be sure the student completed the interview.

This information is again explained when the student graduates or withdraws from school. At this time the student is given an exit interview form to complete. Questions are entertained and consequences of non payment are explained. In addition deferments and cancellations of loans are explained and the student, through NSLDS, can contact the Direct Loan servicer.

The student may complete the exit interview on the Direct Loan Website. The school has access to this website to be sure the student completed the interview.

**SECTION F:**

**VERIFICATION**

When the school receives an ISIR from the Federal Government as a result of completing the FAFSA, the ISIR will have an EFC (Expected Family Contribution) number in the upper right hand corner. If there is an asterisk after the EFC number, the ISIR is selected for a process called verification.

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The federal processor uses a system of edits, or flags, which produces a selection of certain applications for verification. If a student's application is selected for verification, this may mean that a data element in his/her application does not fit generally recognized patterns (not necessarily that the element is incorrect; it merely must be verified), or that the student was simply selected at random.

Federal financial aid cannot be disbursed until verification is complete. The Federal Direct/Stafford Loans may not be certified and processed until verification is complete. Estimated financial aid awards will be removed if verification is not completed within specified deadlines. Any deferred tuition and fees become due immediately. Student will be notified of any adjustments that need to be made. If the corrections are done electronically, the student will be sent an updated Student Aid Report (SAR) from the federal processor.

### **Selection of Applicants to be Verified**

The New York Medical Career Training Center's Office of Financial Aid may also select files for verification if there appears to be a conflict of information. If a student is selected for verification, the student is notified on the Student Aid Report (SAR).

Verification must be completed no later than 90 days past the last day of your enrollment for each academic year. Corrections involving the federal processor must be made prior to mid-August.

Following students are excluded from verification.

- a) Applicants who die during award year (regardless of conflicting information)
- b) Applicants who are legal residents (or dependents of parents who are legal residents) of the Commonwealth of the Northern Mariana Islands, Guam, or American Samoa
- c) Applicants who are citizens of (and dependents of parents who are citizens of) the Republic of the Marshall Islands, the Federated States of Micronesia, or the Republic of Palau
- d) Incarcerated students
- e) Dependent students whose parents reside outside the United States and cannot be contacted by normal means of communication (exclusion is applicable to parental information only)
- f) An applicant who is an immigrant and arrived in the U.S. during either calendar year of the award year
- g) An applicant whose parents' address is unknown and cannot be obtained (exclusion is applicable to parental information only)
- h) A dependent applicant and both parents are deceased or physically or mentally incapacitated (exclusion is applicable to parental information only)
- i) An applicant who will not receive Title IV assistance for reasons other than the applicant's failure to verify the information on the application

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- j) A transfer student who completed verification at the previous school and the current school obtains the correct information/data
- k) Any other applicants excluded from verification by the school

Based on manual ISIR review, those applicants or applications selected for verification are identified. Periodic review of the latest corrections and ISIRs monitors and ensures that all selected applicants are verified and appropriately documented.

### Acceptable Documentation & Forms

- 2010-2011 Verification Worksheet (Dependent or Independent) completed and signed.
- Signed copy of 2009 Parents' Federal Income Tax Returns and all schedules for dependent students.
- Signed copy of 2009 Student's (and Spouse if applicable) Federal Income Tax Return and all schedules (W-2 forms alone cannot be used for verification)
- If you need a copy of your tax return, call the IRS at 1-800-829-1040. Ask for a 1722 letter or tax transcript for the calendar year of 2009. This form is acceptable in lieu of an actual copy of your tax return
- Untaxed income documentation (e.g., letters from the Social Security Administration to verify social security benefits, W-2 forms for contributions to retirement plans, etc.)
- Other documents as needed

Verification must be completed no later than 120 days past the last day of your enrollment for each academic year. Corrections involving the federal processor must be made prior to mid-August. An applicant's failure to provide required documentation within the specified time frame results in the loss of all Title IV aid and all balance tuition charges become due immediately.

### Data Elements to Be Verified

In the verification process, New York Medical Career Training Center verifies the following data elements:

- ◆ Adjusted gross income
- ◆ U.S. taxes paid
- ◆ Household size
- ◆ Number of family members enrolled in a postsecondary educational institution

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- ◆ Untaxed income
- ◆ Any institutionally selected data elements

The following data elements may be excluded from verification, such as:

- ◆ Household size or number in college does not have to be verified if output document is received within 90 days of applicant/parent signing it.
- ◆ Number of family members in the household or the amount of child support reported by an applicant selected for verification does not need to be verified or it is the same as that verified by the institution in the previous award year
- ◆ Enrollment of family members at least half-time in postsecondary educational institutions does not have to be verified if they are enrolled at the same institution as the applicant, and the institution verifies their enrollment status from its own records
- ◆ Untaxed income and benefits need not be verified if the applicant or the applicant's spouse or, in the case of a dependent student, the applicant's parents receive untaxed income or benefits from a federal, state, or local government agency determining their eligibility for that income or those benefits by means of a financial needs test.

The financial aid staff member is responsible for recording changes to verification data elements manually on a paper verification checklist. This ISIR Correction checklist is then faxed to ECM- third party service provider which electronically updates student records on the CPS online. The student SAR/ISIR records are thus resent or retransmitted to the CPS for reprocessing. After processing, when ECM receives the latest and corrected ISIRs, it sends them to school for review and filing.

All documents are filed in student's financial aid file in the school and retained for 5 years. For additional guidance regarding the verification process please refer to the *Application and Verification Guide* of ED's 2010-11 *Federal Student Aid Handbook*.

NASFAA has developed a guide called *Using Tax Returns in Need Analysis* to assist financial aid administrators in reviewing and verifying tax return data. This guide is located under Management Tools on NASFAA's Web site at: <http://www.nasfaa.org>. ECM has developed a 'File Review Checklist' template to assist New York Medical Career Training Center in reviewing and verifying tax return data.

### Conflicting & Inaccurate Information

ECM the school's third party service provider strongly recommends the following guidelines that must be followed when a financial aid professional reviews ISIR and completes verification of the income process.

The Application and Verification Guide (AVG) indicates that ISIRs containing zero income information may be selected for verification by CPS. If CPS does not select it for verification, you may still choose to ask the applicant for further information about her means of support during the base year. Any cash support (not in-kind support) from friends or relatives should be reported on ECM's non taxable income form which has directions on how to report on the FAFSA

The AVG Chapter 4 states, "A school must verify any application information that it has reasons to believe is incorrect [34 CFR 668.54(a) (3)] or discrepant [34 CFR 668.16(f)]. Students with these applications are considered to be selected for verification by the school even though it may not be verifying the same data as for CPS-selected applications." For example, a Financial Aid Counselor noticing in the ISIR that a dependent student's parents have not filed a tax return indicated 4 in the household, 1 attending college and reported \$2500 income for the year. This could be an example of incorrect and discrepant information.

When you receive the student's verification information, you should make sure that the worksheet is signed, that all required sections are completed, and that the relevant tax returns or alternative documents are attached. For example, a relevant tax document and filing status for a married parent or student is 1040, 1040A or 1040EZ and 'married filing joint return' or 'married filing separate return'.

The AVG Chapter 4 further states, "Financial aid professionals are not expected to have special knowledge or expertise regarding the U.S. tax code. If someone whose data were required on the FAFSA submits a signed statement claiming non-filer status and you have reason to believe that person would have been required to file a U.S. tax return, this constitutes conflicting information and must be resolved. ....For example, in such a case, you might require a letter from the IRS, a copy of the applicable tax provision, or other documentation supporting the claim to non-filer status. **Conflicting information must be resolved before you can disburse federal student aid.**"

### **ISIR Review and Corrections**

Errors can occur if the student submits the wrong information or if the information she provided was not scanned or entered correctly. In general, your school must have correct data before it can pay the student, which in some cases means that you or the student must submit corrections for reprocessing.

**Dependency status:** A student must update his dependency status any time during the award year unless it changed because his marital status changed. This update is required whether or not he was selected for verification. For the

Pell Grant Program, the updated information must be submitted to the CPS for reprocessing.

**Household size and number in college:** Unlike dependency status, household size or number in college **cannot** be updated unless the student is selected for verification. If he is selected, these items **must** be updated to be correct at the time of verification unless they changed due to a change in the student's marital status, in which case updating is not permitted.

**PROFESSIONAL JUDGMENT:**

**Policies:** As per the Higher Education Act (HEA) 1965, the Director of Financial Aid exercises discretion in a number of areas to change data used in determining financial aid eligibility when a student has special or unusual circumstances. This authority is known as "Professional judgment." It allows the director to treat a student individually when extenuating circumstances and conditions exist that differentiate that student from a class of students. The professional judgment (PJ) decisions are made on a case by case basis as the result of examining a particular student's unique circumstances.

The PJ is exercised usually before packaging. If warranted, at the time of ISIR or FAFSA application review. Sometimes it may be done when conflicting and inconsistent information on the ISIR is resolved. For more information check the file review, verification and conflicting and inaccurate information sections on the manual.

Financial Aid Director has the authority to exercise Professional Judgment. Financial Aid Director's decision is final and cannot be appealed to the U.S. Department of Education(ED).

Professional Judgment will be exercised after conflicting or inconsistent information has been resolved. For example, unemployment students must provide proof and supporting document before exercising Professional Judgment. Professional Judgment will be exercised after New York Medical Career Training Center received student's ISIR from ECM. ECM will review student's professional Judgment and make the final decision.

**Procedures:**

Students must provide supporting document before exercising their Professional Judgment. Professional Judgment will be exercised after New York Medical Career Training Center received student's ISIR from ECM. ECM will review student's professional Judgment and make the final decision. New ISIR will be sent to New York Medical Career Training Center after ECM has reviewed Professional Judgment.

**Circumstances for Which PJ Adjustments allowed and resulting actions are taken:**

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The financial aid administrator can exercise discretion in certain areas when a student's family has special or unusual circumstances that are not adequately addressed by need analysis, regulations, or legislation. Ed does not regulate PJ. The HEA explicitly authorizes the financial aid administrator to exercise PJ in the following areas:

- Dependency status (dependent to independent only)
- Certain data elements used to calculate the expected family contribution (EFC)
- Cost of Attendance (COA)
- Satisfactory Academic Progress (SAP)
- Unsubsidized Stafford Loan eligibility for dependent students whose parents refuse to complete the FAFSA and borrows a PLUS
- Denial or reduction of FFEL and Direct Loan eligibility
- Unusually high medical or dental expenses not covered by insurance.
- Unemployment (adjust EFC)
- Abusive family relationships (adjust dependency status)
- Unusually high child care expenses (adjust either EFC or COA)
- Natural disasters that impact a family's income or assets (adjust EFC)

There are circumstances for which PJ is never used by Medical Career Training Center, or for which other PJ restrictions apply. Include examples such as:

- An independent student cannot be made dependent
- Changes cannot be made to the Federal Methodology need analysis formula
- No new cost components may be added to the COA
- Costs incurred after students are no longer enrolled (e.g., bar exams) cannot be added to the COA

Each student or parent need analysis data element is adjusted based on information such as:

- Financial aid administrator is responsible for adjusting need analysis data elements
- a financial aid counselor enters all PJ data element adjustments and sets an EFC recalculation flag; an electronic batch process then automatically recalculates EFCs for all flagged records and generates a report reflecting the calculation results; finally, a counselor uses the report to adjust financial aid packages based on the new EFCs
- The procedures for returning institutional Student Information Records (ISIRs) or Student Aid Reports (SARs) to the Central Processing system (CPS) for reprocessing and/or the procedures for adjusting and transmitting the data electronically using Ed's Electronic Data Exchange application processing software (EDEXpress) or Ed's FAA Access to CPS Online Web site.

## **Requests for PJ Consideration:**

### **Policies:**

When describing your policies for considering PJ requests from students and parents, include details, such as:

- The method by which students and parents may submit requests. New York Medical Career Training Center requires all PJ requests to be submitted in writing, but allows exceptions under certain circumstances.
- Deadlines by which requests for PJ consideration must be received
- Supporting documentation required by the school, including time frames and deadlines for submission
- Signature requirements (e.g., at least one parent must sign a PJ request submitted for a dependent student)
- The financial aid office's philosophy on treatment of PJ requests made by the same students or parents in subsequent years (e.g., imposing a one-year limit on students who request PJ consideration every year based on the same set of circumstances)

### **Procedures:**

The process of how students and parents submit requests for PJ consideration to the financial aid office and the actions taken once PJ requests are received. Include information such as:

- How students and parents are made aware that PJ consideration may be requested and that adjustments may be possible (to the extent allowable under school policy).
- Any institutional forms or other documentation required by the school (you may wish to cross-reference the forms and correspondence and the document collection and tracking sections of your manual here.
- How requests are routed to appropriate financial aid office personnel
- Actions taken if PJ requests or other documents are submitted without required signature(s) or are otherwise incomplete.
- Actions taken when requests are submitted without adequate supporting documentation
- How and when students and parents are notified once requests are approved or denied, as well as any subsequent actions to be taken (e.g., a revised financial aid award notification will be mailed within a week or any approved PJ adjustments)

### **PJ Documentation**

The law gives the financial aid administrator the authority to request supplemental information beyond that which is reported on the Free Application for Federal Student Aid (FAFSA) and to collect other documentation which supports a well-informed, well-

reasoned PJ decision. This is important because the special circumstances, upon which the PJ decision is based, as well as any actions taken as a result of that decision, must be thoroughly documented in the student's file. If you decide that a student's situation does not warrant special consideration, this decision must also be noted

### **Professional Judgment and Dependency Override:**

If you make the decision to use Professional Judgment or to perform a Dependency Override, you MUST keep all the documentation in the file.

Also, according to the U.S. Department of Education's Colleague Letter on the subject of Dependency Override's, they stated the following:

A financial aid administrator has the ability to make a documented determination of independence based upon "unusual circumstances." Dependency Override decisions should focus on truly exceptional circumstances and consideration of individual cases, rather than contradicting the fundamental principles of independency. Dependency Override decisions in a situation when a student's parent cannot be located, or where an otherwise dependent student has been a victim of domestic violence and is no longer residing with his or her parents are good examples of "unusual circumstances."

The Department of Education has identified four conditions that, individually or in combination with one another, DO NOT qualify as "unusual circumstances" and DO NOT MERIT a dependency override.

Circumstances are:

1. Parents refusing to contribute to the student's education;
2. Parents unwilling to provide information on the application or for verification;
3. Parents not claiming the students as a dependent for income tax purposes;
4. Student demonstrating total self-sufficiency.

The law also requires that a determination of unusual circumstance(s) must be made each award year.

### **Financial Aid Administrator's Written Determination**

The written documentations from at least two third-parties who are not family members are generally required for supporting a student's unusual circumstances. If possible a letter or two from other persons to substantiate the facts in the student's letter should be obtained. (A letter from a pastor, guidance counselor, doctor, landlord, or other outside person would be helpful). After reviewing all relevant documentation related to a student's assertion that there are unusual circumstances that support why he or she

should be considered to be independent rather than dependent, the financial aid administrator must make a specific determination for the student. Upon making such a determination that a dependency override is warranted, the financial aid administrator must prepare a written statement of that determination, including the identification of the specific unusual circumstance upon which the financial aid administrator based his or her determination. The institution must maintain this documentation and the supporting documentation used to make each determination.

The student must submit a signed statement explaining the circumstances that led him/her to current situation and surrounding the fact that they do not live with their parents. In the letter explain where the parents are located. The letter must state the “unusual circumstance” of why they are no longer living with their parents. For example court documents regarding legal guardianship or other situations are excellent pieces of documentation. Federal and state tax returns are also treated as excellent documents to verify income information. The student also completes a form called ‘Monthly Income and Expense Worksheet’. This form and the dependency override instructions are available in the Office of Financial Aid.

Then the Director of Financial Aid writes a statement stating after reviewing all the facts and documentation he/she feels the person should be considered as an independent student.

The Director of Financial Aid is responsible for making changes to the ISIR data elements manually based on PJ. This ISIR Correction checklist is then faxed to ECM- third party service provider which electronically updates student records on the CPS online. The student SAR/ISIR records are thus resent or retransmitted to the CPS for reprocessing. After processing, when ECM receives the latest and corrected ISIRs, it sends them to school for review and filing.

### **Request for PJ Consideration**

The students and parents depending on the areas of professional judgment indicated above may submit request for a professional judgment call. All requests must be in writing and submitted within the term of enrollment or as soon as the situation arise to the Office of Financial Aid. The Office will not accept any incomplete application. The student or parent is notified in writing once the request is approved or denied. If the PJ resulted in a revised award package, student also receives a revised award notification by mail.

There are circumstances where PJ would not be used such as an independent student cannot be made dependent, a change cannot be made to the Federal Methodology need analysis formula, post-enrollment costs cannot be added to a student’s budget etc.

PJ consideration must be documented on a case-by-case basis. The documentation must relate to the student’s special circumstances that differentiate the individual

student (not to conditions that may relate to a whole class of students). All documentation must be kept in the student's file. New York Medical Career Training Center resolves all conflicting information for a student before exercising professional judgment.

### **Policies**

Written documents from students are acceptable documents. For example, a student who incurs unusually high day care expenses might submit a statement of costs from the day care center or copies of cancelled checks, as well as an explanation of why it is necessary to incur day care expenses that are higher than normal for that community.

If a student has the same request for a PJ in the next award year, a new request must be made. The student must submit documentation again and consideration will be given in a reasonable time.

- The student will normally notify the Financial Aid Office if they are requesting a PJ based on unusual circumstances.
- When the student makes the school aware of special circumstances, they are advised of the documents need to verify the status.
- The student or parent is informed of the specific type of document he or she must submit (e.g., a doctor's statement for a parent who has lost wages due to a prolonged illness)
- If the requested documentation is insufficient or unclear (e.g., the financial aid counselor calls the student to clarify the information verbally and then notes that conversation in the student's file or the counselor mails the document back to the student requesting written clarification.
- If required documents are submitted after deadlines have passed the school will do all they can to work with the student.

An aid administrator may use professional judgment (PJ), on a case-by-case basis only, to alter the data elements used to calculate the EFC. The alteration is valid only at the school making it. You submit a PJ change electronically, via FAA Access to CPS Online or third-party software, and you may do it without a signature from the student or parent. The reason for the adjustment must be documented in the student's file, and it must relate to the special circumstances that differentiate him.

***How to handle discrepant tax data?*** The ED has already stated that financial aid administrators do not need to be tax experts, yet there are some

issues that even a layperson with basic tax law information can evaluate. Because conflicting data often involve such information, financial aid administrators must have a fundamental understanding of relevant tax issues that can considerably affect the need analysis. You are obligated to know: (1) whether a person was required to file a tax return, (2) what the correct filing status for a person should be, and (3) that an individual cannot be claimed as an exemption by more than one person. Publication 17 of the IRS, *Your Federal Income Tax*, is a useful resource for aid administrators. You can view it on the Web at [www.irs.gov](http://www.irs.gov) or you can call the IRS at 1-800-829-3676 to order a copy. For example, a Financial Aid Administrator noticing that a dependent student's married parents have each filed as "head of household" (which offers a greater tax deduction than filing as single or married) must question whether that is the correct filing status. Publication 17 explains on pp. 22–23 the criteria a person must meet to file as head of household. Resolution of the conflict may be a reasonable explanation of why there appears to be a conflict but is none, or the parents may re-file and submit a copy of the amended return.

***Is a school obligated to resolve conflicting information?*** The school must resolve all such conflicting information, except when the student dies during the award year. If your school has conflicting information concerning a student's eligibility or you have any reason to believe a student's application information is incorrect, you **must** resolve the discrepancies before disbursing FSA funds. If you discover discrepancies *after* disbursing FSA funds, you must still reconcile the conflicting information and take appropriate action under the specific program requirements.

***Do I have to resolve conflicting information?*** You may not disburse aid until you have resolved conflicting information, which you must do for any student as long as he is at your school. Even if the conflict concerns a previous award year, you must still investigate it. You have resolved the matter when you have determined which data are correct; this might simply be confirming that an earlier determination was the right one. Of course, you must document your findings in the student's file and explain why, not simply assert that, your decision is justified.

### **What should your school do if a tax return isn't available?**

If a copy of the tax return is not available, the student must instead submit a copy of any IRS form that lists tax information and provides the information needed for verification. The form **must** be signed by the student unless the IRS sent the form directly to the school. A common form is the tax transcript. A student can order one by calling the IRS at 1-800-829-1040 and following the directions below or by completing and mailing Form 4506-T, *Request for Transcript of Tax Return*. If the transcript does not have as much financial information as the tax return, the student may have to provide additional documents to complete verification. If the IRS can't provide a copy of the return

or any form with tax account information, you must get a copy of the W-2 unless the filer is self-employed or a W-2 is otherwise unavailable; in those cases you can accept a signed statement from the filer certifying that his or her income and other appropriate information is correct.

### **How to obtain a tax transcript or a copy of a return?**

If a person wants a copy of a return, she must complete and mail a Form 4506; if she wants a tax transcript, she can either submit a Form 4506-T or she can call 1-800-829-1040 and use the automated system to request one. The steps in the automated system are generally: choose the option for “personal tax account,” enter the SSN or EIN, choose “transcripts,” enter the numbers of one’s street address, and enter the year of the return requested.

### **What is a completed and acceptable tax document?**

For verification purposes, you can accept a copy (such as a photocopy, fax, or digital image) of the original signed return filed with the IRS. If a fax, photocopy, or other acceptable copy was made of an unsigned return, the filer (or at least one of the filers of a joint return) must sign the copy. You can also accept a tax form that has been completed to duplicate the filed return; this duplicate must contain at least one filer’s signature. Instead of a return the filer has signed, you may accept a paper return on which the tax preparer has stamped, typed, signed, or printed her name (not the name of her company) and her SSN, EIN (Employer Identification Number), or PTIN (Preparer Tax Identification Number). You may also accept a copy of an IRS form with tax account information that the IRS mailed directly to your school (otherwise at least one of the filers must sign the form). Documentation from electronic returns must be signed by the filer, as explained in the following section. In some cases you can waive the requirement for spouse information and signatures (see “Verification exclusions,” p. 77). For details, please refer to Application and Verification Guide: Chapter 2, 4, and 5 of 2009-10 FSA Handbook

In the event school discovers fraudulent activities and misrepresentation of facts in the FAFSA application, it refers suspected fraud to ED's Office of Inspector General (OIG) under the Section 668.16(g) (1) of the federal regulations.

### **Student Notification of Verification Changes**

The Office of Financial Aid notifies students in writing of the results of verification if, as a result of verification, the applicant's expected family contribution (EFC) changes and results in a change in the applicant's award or loan amounts.

The changes in the applicant's award or loan amounts are revised in the packaging worksheet/estimated financial aid and documented in student file.

For details please refer to the award letter/package notification section of the manual.

### **Database Matches, Reject Codes, & "C" Codes Clearance**

The Office of Financial Aid must review the latest ISIR or the copy of Student Aid Report (SAR) as it receives from ECM or student for the following vital information for their correctness and accuracy.

- Social Security Number  
Match student's name and social security number on the Social Security Card with the ISIR. Student must use same name on ISIR as on SS card.
- Citizenship Status  
Student must be a permanent resident or meet other criteria which is outlined on IFAP or ECM Training Manual. If the citizenship status cannot be confirmed, a form G845 must be sent to the Department of Immigration to confirm citizenship status.
- Selective Service  
If student did not register must have a good reason which must be obtained in writing from the student. (ex. Student was incarcerated between ages of 18 and 26)

If a student cannot document that they meet one of the specific exemptions, they must write to Selective Service for an advisory opinion as to whether they willfully avoided registration requirements and the opinion rendered will be considered as part of the institution's final determination.

- Drug Offense Conviction  
If the student had a conviction while receiving title IV funds, you must have the student complete the Drug worksheet to see if they are eligible.
- Name and DOB mismatch  
Obtain birth certificate, driver's license etc to verify information
- NSLDS Default  
Student must resolve default or repay grant to the Guaranty Agency or to the Federal Government. No aid may be given without letter from appropriate Agency.

### **Secondary Confirmation of Citizenship:**

If the database match with immigration records doesn't confirm a student's claim to be an eligible non citizen, the DHS will automatically check if it has documentation to determine the student's citizenship.

The CPS will wait for up to three days to give the DHS time to conduct the automated secondary confirmation. After three days the CPS will process ISIRs with a secondary confirmation match flag of “P,” meaning the procedure is still in progress. Once DHS finishes the confirmation, the CPS will generate SARS and ISIRS reporting the results.

If the student didn't pass automated secondary confirmation or the financial aid staff has conflicting information about the immigration status, the school institutes a paper secondary confirmation. The student has to give unexpired documentation showing he is an eligible noncitizen. If the documentation demonstrates the student is an eligible noncitizen, it is submitted to USCIS to confirm it as valid.

### **Review of Subsequent ISIR Transactions**

The Office of Financial Aid reviews subsequent Institutional Student Information Record (ISIR) transactions as they receive them from ECM and complete review within one week to ensure correctness of the information based on the corrections made in the previous transaction.

The subsequent ISIR transactions are identified as the office of financial aid receives ISIR printouts from ECM, the school's third party service provider. The financial aid staff members are responsible for ISIR reviews check for subsequent verification, “C” code problems, unauthorized student changes etc. The student if necessary is then contacted in writing or via telephone to provide documentation to resolve issues and conflicting information contained in the latest ISIR. If a student becomes ineligible for any or all Title IV aid, the aid must be cancelled immediately.

### **Additional Institution-Specific Data Elements**

It is important to note that the New York Medical Career Training Center uses only federally-required verification data elements to calculate a student's aid eligibility.

## **SECTION G:**

### **AWARDING FINANCIAL AID**

#### **Budget (Cost of Attendance)**

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Because there is more to pay for a student than tuition, the COA includes more than just tuition and fees. The elements that are included are: • Tuition • Fees • Room • Board • Books and Supplies • Transportation • Personal Expenses. New York Medical Career Training Center develops separate budgets for Dependent and Independent Students. Special consideration in the budget may be given to Students with dependent care costs and students with disabilities.

The terms budget, cost of attendance (COA), and cost of education are synonymous. The New York Medical Career Training Center use the term 'budget'.

New York Medical Career Training Center construct separate budgets for two categories below:

### Category I

1. Independent students with dependents other than a spouse
2. Single independent students
3. Married independent students without other dependents
4. Dependent students/living by their own

### Category II

1. Dependent students/living with parents
2. Single independent students/living with parents

The financial aid staff members manually assign a budget to each student based on information available in the latest ISIR and school admission records. Budget assignments are verified for accuracy by comparing the student's enrollment status from admission and registration records and ISIR information.

## How Budgets are Derived & Updated

New York Medical Career Training Center uses the following federally-mandated basic components to derive a student budget. These basic components are:

- ◆ Tuition and fees
- ◆ Books and supplies
- ◆ Room and Board HEA
- ◆ Transportation HEA
- ◆ Miscellaneous HEA

Tuition and Fees are determined by the Board of Directors annually based on last years' administrative and operating costs, and inflation adjustments. The following calculations based on the average costs resulted from the cost of living survey, student questionnaires, and surveys are used every year by June

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30 to determine the annual Pell budget (9 month period) for Room and Board, Transportation and Miscellaneous components for the upcoming academic year.

Room and board  $900 / \text{month} \times 9 = 8100$  for Category I

Room and board  $\$300$  per month  $\times 9 = \$2700$  (20 meal @  $\$15.00$  per month) for Category II

Transportation:  $\$25 / \text{wk}$  in gas. ( $\$5$  per day in gas--avg. of 60 miles/day.)

MISC expense:  $\$200$  per month  $\times 9$  months = 1800

The assigned budgets are discussed with student during the financial aid counseling session and documented in a form called 'Estimated Financial Aid and Budget' form. The student accepts and signs the form and receives a copy of it. The form is kept in student file for future reference.

### Additional Costs

Students are made aware of the possibility of increased budgets during the initial financial aid information session. Under special circumstances student documentations such as rental agreement is used to justify additional room and board expenses. Additional costs are not automatically included in the budget. Student must request for budget increase in writing with verifiable supporting documentation to justify and request such increase. Review of budget adjustments is done manually prior to packaging in most cases. The financial aid staff members are responsible for determining and approving additional costs based on verifiable supporting documents. All documents are kept on student file. The modification of award package is not necessary as the review of budget increase is done prior to packaging a student.

The student is notified of any budget change in writing or via phone call by the financial aid staff members.

For new students entering in the 2010-11 academic year, the following is provided to assist you with your planning:

TOTAL COST OF ATTENDANCE (BUDGET)	ALL COMMUTER
<b>Tuition and Fees</b>	<b>\$ 10,000</b>
<b>Room and Board</b>	<b>\$ 8,100</b>
<b>Books and Supplies</b>	<b>\$ 400</b>
<b>Transportation</b>	<b>\$ 900</b>
<b>Miscellaneous</b>	<b>\$ 1,800</b>

## **Packaging Philosophy**

The staff in the Office of Financial Aid at New York Medical Career Training Center is dedicated to assisting students and their families to open the doors to a quality private education to enhance the quality of work life. While the primary responsibility of meeting college costs rests with the student and family, our financial aid professionals under the leadership of the Director of Financial Aid seek to maximize financial aid opportunities by providing guidance and information about scholarships, grants, loan programs, student employment, and payment options. More than 90 percent of New York Medical Training Center's students receive financial aid, take advantage of different payment options, or participate in the Direct/Stafford loan programs.

To obtain maximum consideration for financial aid, the student and family must learn:

- About eligibility for various funding programs that are available.
- To follow instructions provided on various application forms and other materials.
- To pay careful attention to deadline dates.

Timely submission of application forms and other required documentation will enable our staff to process student's requests accurately and in a timely fashion for the start of classes.

## **Packaging Groups**

New York Medical Career Training Center uses 2 different packaging groups based on the number of eligible academic programs under two different budget categories (see budget section of the manual). Packaging categories are based on academic programs which are different in terms academic period and tuition & fees. Packaging groups are as follows:

### **A. Full time Medical Assistant Program**

The financial aid staff members manually assign a packaging and budget group to each student based on information available in the student's enrollment agreement, latest ISIR and other school admission records. The packaging and budget assignments are verified later for accuracy by comparing the student's enrollment status from admission and registration records and ISIR information.

## **Available Amounts & Number of Eligible Students**

New York Medical Career Training Center participates in the following federal and state financial aid programs:

- A. Federal Pell Grant is a federal grant that does not have to be repaid. It is awarded based on the EFC calculated by the federal processor. Grants may be made to students enrolling for as few as 900 clock hour's class if

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eligible. In the 2009-10, average Pell grant award amount was \$2,675 and the number of student funded was 27.

- B. Federal Direct/Stafford Loans are fixed interest rate loans made to students. Students are eligible for the following levels of awards: freshman \$3,500 subsidized. The unsubsidized loan amount is \$6,000 who is independent. A dependent student may borrow \$2,000 in the unsub program if the parents are eligible for a PLUS loan. If the parents are not eligible the student may borrow \$6,000 in the unsub program. All Sub loans have to be repaid in monthly installments in 10 years starting six months after graduation or discontinuation of enrollment below half time. Unsub loans' interest must be paid while the student is in school or may be capitalized and repaid with the principal after graduation.
- C. PLUS loans are low-variable interest rate loans available to the parents of dependent undergraduate students to help with educational expenses. Parents may borrow up to an amount equaling the budget minus any other aid received. Repayment of these loans begins within 60 days after the final disbursement. A parent may request to begin repayment after the student graduates or withdraws, but the interest is capitalized during the time the student is in school.

### **Determining Award Amounts**

New York Medical Career Training Center participates in the Federal Pell and Direct Loan program at this time. The financial aid staff members determine the amount of Pell and Loan based on the EFC (expected family contribution), student's budget and estimated financial need. Although students and parents can borrow up to their total budgets, New York Medical Career Training Center encourages students to keep their federal direct loan borrowing to the minimum.

### **Package Construction**

The Office of Financial Aid must have and follow consistent packaging policies. All accepted and eligible students are awarded equitably and consistently within established need parameters. The estimated financial aid need is determined by subtracting expected family contribution from the student's budget. All outside resources and grant/scholarships are considered as part of the financial aid package.

All eligible students receive an estimated financial aid package as soon as they are accepted and the FAFSA application is completed and processed. The entire packaging process is manual. However, no Title IV aid can be requested to ECM to be disbursed and credited to student's ledger card until verification, file review, reject codes, 'C' codes issues are resolved. Once the student's Federal

## A Model Financial Aid Policies and Procedures Manual

Pell, and Federal Direct/Stafford Loans are processed, ECM generates a Title IV Award Notification and sends to School to be notified to student and filed.

The Director of Financial Aid is responsible for overseeing the packaging process. ECM, school's third party service provider conducts annual file review to ensure school is within Title IV, state and institutional compliance.

### **Award Package Notification**

All students who have been packaged are notified through mail or during the financial aid counseling session. The award notification provides student's budget, indicates the expected family contribution (EFC), the student's total need and remaining need amounts. It also indicates the enrollment period, terms, or payment periods as they relate to awards and their disbursement for student costs. The award notification also provides detailed information describing the amount and type of aid awarded and any conditions linked to award eligibility for each type.

A statement disclosing a student's financial aid rights and responsibilities, including appeal, revision, and renewal procedures, as well as the standards a student must meet to continue to receive aid when a student does not respond to the award notification, the Office of Financial Aid must send a reminder via e-mail, phone calls, and/or paper notices.

### **Packaging Appeals**

If a student wishes to appeal, he/she may do so in writing along with all relevant and supporting documentations within 15 days of the receipt of such award notification. All appeals must be sent directly to the Director of Financial Aid. The Director of Financial Aid reviews the appeal, makes determination and adjust award package if necessary within two weeks from the date the appeal is received. The student is informed of the appeal process in writing.

### **Award Package Notification Revisions**

Certain conditions such as changes in program of study or enrollment status, additions of outside grants/scholarships may arise that might require an award package notification revision. The Director of Financial Aid is responsible for overseeing this process. Generally budget is reviewed first and then loan depending on student's preference is revised. The revision is done manually in a packaging worksheet labeled as 'Revised Packaging Worksheet'.

For details please refer to the award package notification and over-reward sections of the manual.

### **Over-rewards**

The financial aid office must ensure that a student does not receive more Title IV aid than the amount for which he or she is eligible. Over-reward is defined as the offered financial aid that exceeds student's budget and unmet need.

## A Model Financial Aid Policies and Procedures Manual

Over-rewards can occur for a variety of reasons such as change of program, and enrollment status, receipt of outside scholarships, packaging errors caused by school etc. For example, in a situation where a student did not report receipt of an outside scholarship to the financial aid office; but the student accounts office reports receipt of those funds to the aid office, an over-reward is discovered and must be resolved.

### **Resolving an Over-reward When Student is Liable**

The financial aid package is adjusted to correct any over-reward situation by reducing or canceling award(s), terminating the student's CWS employment, and/or returning loan proceeds that have not been credited to the student. The student is then notified in writing and a revised award notification is sent. The Federal Pell Grant awards are not reduced to resolve over-rewards of campus-based or Direct Loan funds. When the school has determined that the student is liable for the over-reward, he/she is notified in writing regarding his/her obligation to return those funds.

### **Resolving an Over-payment When School is Liable**

When students are not liable for any Title IV funds overpayments caused by school error and that such overpayments cannot be corrected by reducing subsequent disbursements, the New York Medical Career Training Center immediately processes a return within 45 days of such discovery of an overpayment situation.

## **SECTION H:**

### **DISBURSEMENTS**

#### **Payments and Anticipated Aid**

All students are sent billing statements at their permanent home addresses with instructions for making payments. All billing statements list school-assessed charges less any anticipated aid. All students must complete the FAFSA and have a valid ISIR to be considered for federal aid. Failure to apply for financial aid in a timely manner does not relieve the student from meeting all school payment deadlines. All School charges are listed in the School Catalog.

**Please note: All current school charges for tuition, fees, books & supplies must be paid in full BEFORE students are allowed to register for the following next term's classes.**

For new students entering in the 2010-11 academic year, the following is provided to assist you with your planning:

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TOTAL COST OF ATTENDANCE (BUDGET)	ALL COMMUTER
<b>Tuition and Fees</b>	<b>\$ 10,000</b>
<b>Room and Board</b>	<b>\$ 8,100</b>
<b>Books and Supplies</b>	<b>\$ 400</b>
<b>Transportation</b>	<b>\$ 900</b>
<b>Miscellaneous</b>	<b>\$ 1,800</b>

Federal monies are requested through ECM the third party servicer. ECM provides forms to be completed which assure that the correct amount of funding is drawn down for each student from the Federal Processor. The form requires the school to complete the student's name, social security number, Cost of Attendance, if the student is dependent or independent, any other aid the student receives and the amount the school expects to receive. If it is a second disbursement, the school is also required to provide Satisfactory Academic Progress information

### **Definition of an Academic Year:**

An academic year is the measure of the academic work to be accomplished by a student each year as defined by the school. For instance, at a school that uses terms, the academic year must contain at least 30 weeks of instructional time in which a full-time student is expected to complete at least 24 semester or trimester hours, 36 quarter hours, or 900 clock hours.

An academic year for a credit-hour program must be defined as at least 30 weeks of instructional time, and for a clock hour program at least 26 weeks of instructional time.

The number of weeks of instructional time is based on the period that begins on the first day of classes in the academic year and ends on the last day of classes or examinations. For all FSA programs a week of instructional time is any period of 7 consecutive days in which at least one day of regularly scheduled instruction, examination or after the last day of classes, at least one scheduled day of study for examinations occurs.

The following are the minimum standards for coursework earned by a full-time student in an academic year in an undergraduate program:

- 24 semester or trimester credit hours or 36 quarter credit hours for a program measured in credit hours or
- 900 clock hours for a program measured in clock hours.

### **Payment Periods**

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NY Medical Training Center has clock hour programs. The payment period is defined not only in clock hours but also in weeks of instructional time

The following types of programs must use payment periods that are based on the time it takes for the student to successfully complete clock hours and weeks of instructional time in the payment period:

1. **Clock hour programs**

If the program is one **academic year or less**, the academic year or program is divided into two payment periods. The first payment period is the period in which the student successfully completes  $\frac{1}{2}$  clock hours AND  $\frac{1}{2}$  the weeks of instructional time in the program. The second payment period is the period in which the student completes the remainder of the program.

If the program is **more than one academic year in length**: Use the rule for one Academic year for each full academic year in the program.

For any remaining portion of a program that is  $\frac{1}{2}$  an academic year or less, the remaining portion is treated as a single payment period.

For any remaining portion of a program that is more than  $\frac{1}{2}$  an academic year but less than a full academic year, the remaining portion is divided into 2 payment periods and the first payment period is the period in which the student successfully completes  $\frac{1}{2}$  of the credit or clock hours and  $\frac{1}{2}$  the weeks of instructional time in the remaining portion

### **How Title IV Funds are Disbursed:**

Pell funds are disbursed on or after the first day the student starts school. Loan Funds are disbursed after 30 days of attendance at the school. The second disbursement is made once a student enters the second payment period. SAP must be tested to be sure the student has completed the required credits, quarter credits, clock hours to finish the first payment period with the correct number of weeks. The student must have passed all the courses with a 2.0 GPA. The Registrar enters the grades and credits into the computer. The Financial Aid Staff checks SAP and informs the Accounting Office to disburse the funds.

### **Student Refunds**

If personal payments and/or financial aid posted to a student's account create a credit balance, the student is issued a refund. Generally, refunds are issued within 14 days of a credit balance being created. Please contact the New York Medical Career Training Center's Bursar's Office at (718) 460-4340.

The students are given the option to request that first disbursement credit balances be kept by the school to pay for the second payment period tuition. A form is offered to the student and if the student desires this option, the form is signed by the student and kept in the student file.

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Any refunds of excess funds from PLUS loans are made directly to the parent unless the parent requests otherwise.

The Bursar's office uses Quick Books and Excel to handle the receipt of Federal Money which is kept in separate bank accounts, one for Pell and one for Loans. The bank accounts are marked as Federal Pell Account and Federal Direct Loan Account.

### **Disbursement Process**

In accordance with the cash management regulations, New York Medical Career Training Center assigns two organizationally independent entities to handle the two related but distinct functions of awarding and authorizing payments and disbursing (or delivering) Title IV funds. No one office alone is responsible for both functions. While the Office of Financial Aid after resolving all pending student eligibility issues awards and authorizes Title IV fund payments to students, ECM- the Third-party service provider for the school upon receipt of the 'Data Input Form' from the Office of Financial Aid, disburses or delivers the Title IV funds. The Office of Student Accounts/Bursar is responsible for crediting such payments to student's accounts upon receipt of such funds from ECM. This requirement is taken so seriously by the School that the individuals responsible for each of these functions may not be related to one another, nor may they together exercise substantial control over the institution.

The Bursar's Office uses monthly attendance report, and other reports generated by the Office of Academic affairs to verify the identity and enrollment status of students, endorsement requirements, student notifications, and timely delivery of credit balances. The Office of Financial Aid Offices receives monthly all updated Student Ledger Cards from Bursar's Office.

### **Definition of Disbursements & Disbursement Methods**

The financial aid office staff members are trained and made fully aware of the school's policies and procedures regarding what constitute a disbursement and disbursement methods even though these activities are under the purview of ECM and Bursar's Office. This awareness of the New York Medical Career Training Center's practices ensures better counseling of students and clearer instructions from the aid office.

The New York Medical Career Training Center's policies regarding disbursement of Title IV funds are that the School credits individual student accounts only after the ECM disburses Title IV funds. NEW YORK MEDICAL CAREER TRAINING CENTER does not penalize any Title IV recipients for nonpayment of fees due to financial aid regulations or delays attributable to the school.

Money from Federal Funds is disbursed to a student's account within three days of receiving the funds.

Bursar and Financial Aid Office records should match monthly with COD school totals to assure totals match.

### **Disbursement Dates & Schedules**

The New York Medical Career Training Center prepares a roster for disbursement dates and schedules for all its programs that are eligible to participate in Title IV aid programs. See 2008-09 *FSA Handbook*, Vol. 2, Chapter 5 for details on the federal regulations.

Although New York Medical Career Training Center discourages late disbursements, however, in the events where late disbursements and post-withdrawal disbursements are necessary, the financial aid office looks at individual students and determines such eligibility for late disbursements or post-withdrawal disbursements as per 668.164(g) of HEA 1965.

### **Prior Year Charges**

The amended regulations in 34CFR 668.164(d)(2) increase from \$100 to \$200 the maximum amount of prior year charges that may be paid with current year funds, but remove the provision that allowed an institution to pay for prior year charges above that amount under certain circumstances.

For purposes of these regulations the cost of education and other services an institution provides to a student are associated with the "year" for which the education and services are provided. If a student's aid package includes a Direct Loan, the year is the loan period. If the student does not have a Direct Loan the year is the award year.

The institution complies with the regulation.

### **Holding Excess Title IV Funds (Credit Balances)**

The New York Medical Career Training Center has a policy for obtaining a student's or a PLUS borrower's authorization to disburse Title IV funds by crediting the student's account to pay charges for educationally-related activities other than tuition, fees, contracted room and board, and minor prior-year charges and hold excess fund to pay for the future terms. In each aid year this authorization is collected at the time student accepts his/her financial aid. Student may cancel this waiver any time by notifying financial aid and bursar office in writing.

WAIVER OF REFUND AND PERMISSION TO RETAIN FUNDS FROM CREDIT  
BALANCES ON STUDENT ACCOUNT

I hereby waive my right to an immediate refund of any credit balance that may appear on my student account as a result of all Title IV funds (except FWS) including other outside financial aid funds applied against my tuition account. I understand that these credit balances may be applied against institutional charges for educationally-related activities other than tuition, fees, other direct institutional & minor prior-year charges. I further understand that if any credit balance remains at the end of my course of study it will be refunded to me within 14 days of my graduation date. I have the right to revoke this waiver at anytime by informing the school in writing and I will receive a refund of any existing credit balance that may exist at the time of my revocation within 14 days. I further understand that as stated in the school catalog that the full program's tuition payment is due on the day of registration.

\_\_\_\_\_  
STUDENT SIGNATURE

\_\_\_\_\_  
DATE

**Student & Parent Notifications**

Crediting Title IV Loan Proceeds & Borrower's Cancellation Right

Crediting Post-Withdrawal Disbursements Containing Title IV Loan Proceeds & Borrower's Cancellation Right

Under certain circumstances, schools are required to provide notifications to students and PLUS borrowers. The Bursar or Financial Aid Office of NEW YORK MEDICAL CAREER TRAINING CENTER must notify:

1. Students of their eligibility for funds from each of the Title IV programs and provide payment information 668.165(a)(1)(i), 675.16(a)(2)
2. If the school disburses Title IV loan proceeds (other than FFEL proceeds the lender disbursed to the school by individual check) by crediting the student's account, notify the borrower of the disbursement date and amount, his or her right to cancel all or a portion of the loan, and the procedures for requesting cancellation 668.165(a)(2).
3. If the school made a post-withdrawal disbursement containing loan proceeds (other than FFEL proceeds the lender disbursed to the school by individual check) by crediting the student's account, notify the borrower of the disbursement date and amount, his or her right to cancel all or a portion of the loan, and the procedures for requesting cancellation 668.22(a)(4)(i)(B)

The Bursar's Office offers a student (or PLUS borrower) any portion of a post-withdrawal disbursement not credited to the student's account, and notifies the student and PLUS borrower of the procedures for requesting the un-

## A Model Financial Aid Policies and Procedures Manual

disbursed funds as per 668.22(a)(4)(ii), 668.165(a)(2)-(5), 668.22(a)(4)(i)(B) 668.165(a)(2)-(5) of HEA 1965. In all the events indicated above, if cancellation and/or reduction of loans are necessary, the student and parent must notify the school within 14 days from the receipt such notice. If the school does not receive any request within 14 days, it will assume both student and parents have accepted full disbursements and allowed school to credit student's account.

### **Direct Loan Program Bank Account**

The institution maintains a bank account into which Ed transfers Direct Loan Funds. The account is Federally insured. The institution maintains a separate account for Federal Direct Loan funds;

### **Direct Loan Quality Assurance Program**

The institution maintains a Qualify Assurance Program for Federal Direct Loans as required by the Direct Loan regulations.

### **Direct Loan Reconciliation**

The institution works with the third party servicer to reconcile COD records with institutional records on a monthly basis.

## **Title IV Eligibility & Payment Information**

New York Medical Career Training Center's Office of Financial Aid and Bursar Office notify all students of the amount he or she can expect to receive from each of the Title IV programs, including PLUS, and providing the student with required information regarding the payment of those funds such as the payment method, expected amount, expected date of disbursement, etc.

The written notification is sent to students via mail when all financial aid awarding processes, submission and review of all supporting documentations are complete and students' eligibility is confirmed. The Office of Financial Aid sends notification regarding the expected award amounts. The Bursar Office is responsible for sending the notification regarding the payment method and expected date of disbursement as per 668.165(a)(1) and 675.16(a)(2) of HEA 1965.

### **Offering Post-Withdrawal Disbursements Not Credited to Student's Account**

New York Medical Career Training Center notifies the student and PLUS borrower of post-withdrawal disbursements not credited to the student's account and of the procedures for requesting the un-disbursed funds in writing. If the fund has to be cancelled or reduced, the borrower must request so within 14 days from the receipt of such notification from the Bursar's Office.

The Bursar's Office must generate a report to review the group of such students and monitors the 14 day time period to comply with the regulations 668.22(a)(4)(ii) and 668.165(a)(2)-(5) of HEA 1965.

**SECTION I:**

**Satisfactory Academic Progress**

**Process Overview & Responsibilities**

To be eligible for Title IV aid, a student must maintain satisfactory academic progress (SAP) as per section 668.16(e) of HEA 1965. New York Medical Career Training Center developed policies to determine the academic standards that students are expected to meet and then a means and schedule of measuring the achievement of those qualitative and quantitative standards. If the student has made acceptable qualitative and quantitative progress for that particular increment, then the NEW YORK MEDICAL CAREER TRAINING CENTER reviews the 150 percent of the maximum allowable time frame criterion to measure student's SAP.

SAP standards are established by the Office of Academic Affairs. The relevant SAP policies are summarized below.

All students must maintain Satisfactory Progress according to the following standards in order to continue enrollment. Satisfactory Progress is measured at the beginning of each term/semester, and will be checked prior to disbursement of aid.

**Same As or Stricter Than:**

New York Medical Career Training Center's SAP policy for Title IV students is the same as the school's standards for students enrolled in the same educational programs who are not receiving Title IV aid. The Title IV SAP policy is the same as the school's academic policy as indicated above.

The Director in the financial aid office reviews the Title IV SAP policy to ensure it meets all federal requirements. The Director of Academic Affairs notifies financial aid office if the school changes its academic policies.

**Transfer Students:**

NEW YORK MEDICAL CAREER TRAINING CENTER will count those transfer credits that apply toward the student's current program in determining SAP.

A student who changes their major will be considered as a transfer student into the new program

**Quantitative Measure of Satisfactory Academic Progress (SAP)**

New York Medical Career Training Center’s satisfactory academic progress policies also contain a quantitative measure. The policies specify a maximum time frame not to exceed federally-required 150 percent of the published length of the program in which a student must complete his or her academic program. The time frame may be measured in credit hours earned. The maximum time frame set as 150 percent of scheduled number of semesters in the program.

Timeframe - All students must satisfactorily complete their program within 150% of the normal timeframe.

<u>Diploma</u>	<u>Normal Timeframe</u>	<u>Maximum Timeframe</u>
Medical Assistant	34 weeks	51 weeks

At the midpoint of the maximum timeframe, students must have successfully completed 1/2 of the program’s credit hour requirements. For example: The maximum timeframe for the Medical Assistant is 51 weeks. The total clock hours needed for completion of this program is 900 clock hours. By the time the student has been in the program for 25 weeks (1/2 of the maximum time frame), they must have earned at least 450 clock hours. This time frame is applicable for all students including those who did not receive financial aid.

**Probation**

The students who have failed to meet the quantitative standards are placed on probation or the student is denied future Title IV aid. The Director of Financial Aid in coordination with the Office of Academic Affairs monitors quantitative progress. The financial aid office receives quantitative information about Title IV recipients from the Office of Academic Affairs. The quantitative SAP is reviewed manually and a copy of the latest transcript is kept on student file. The office of financial aid notifies students in writing their progress or lack of progress at the end of each enrollment period or term.

**Qualitative Measure of Satisfactory Academic Progress (SAP)**

As per sections 668.16(e)(2)(i) and 668.34 of HEA 1965, New York Medical Career Training Center follows a qualitative measure. The measurement is graduated. The following policy provides a detailed description of how qualitative progress is monitored and by whom. New York Medical Career

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Training Center realizes that, oftentimes, students must make an adjustment to the academic demands of pursuing an education.

### **Grading System**

The grading scale for the Programs is as follows:

<u>Numerical Scale</u>	<u>Letter Grade</u>	<u>Points</u>
97 - 100	A	4.00
94 - 96	A-	3.67
91 - 94	B+	3.33
87 - 90	B	3.00
84 - 86	B-	2.67
81 - 83	C+	2.33
77 - 80	C	2.00
74 - 76	C-	1.67
65 - 73	D	1.00
64 - Below	F	0.0
W	Withdrawn	0.0
I	Incomplete	0.0

Pass - Satisfactory completion of non-graded Externship.

Fail - Unsatisfactory completion of non-graded Externship.

### **Withdrawals**

A student who withdraws from a course and receives a “W” in the course will have that course counted in the quantitative component of Academic Progress.

### **Incompletes**

A student who receives an incomplete in a course must complete the course within 60 days or the “I” grade automatically changes to an “F”.

### **Repeated Courses:**

If a student repeats a course only the highest grade will be counted and previous grades will be deleted. The previous grades will be excluded when considering the qualitative progress standard, but the credits will be counted when determining the quantitative SAP standard.

If a student receives a “D” grade or better, and the student retakes the course to obtain a better grade, that course cannot be counted for the enrollment period (this may affect the financial aid). If a student receives an “F” grade in a course and retakes the course so he/she may obtain credit for the course, the

course is counted for the enrollment period and may be counted for financial aid purposes. This rule may change in November 2010.

### **Increments**

To ensure the student is making sufficient progress both quantitatively and qualitatively, New York Medical Career Training Center's SAP policy divide the maximum time frame into equal evaluation periods called increments. These increments generally coincide with payment periods. But in any case it cannot be longer than half the program or one academic year, whichever is less. For example in a 22 credit program, an increment must not exceed 11 clock hours. See sections 668.16(e)(2)(ii) (B) and 668.34(e) of HEA 1965 for details on the federal regulations.

### **Probationary Period**

A student being placed on academic probation for the following period if he/she fails to achieve a cumulative grade point average (CGPA) of "C" (2.0/4.0 scale) or better in the preceding semester or term. A conference is held between the Director of School (or his/her designee) and the student.

Indication of academic probation is designated on the student's official transcript.

**\*If a school is required to take attendance, you must state the number of days that a student may be absent before being dropped.**

### **Student Appeal Procedures**

A student, who wished to appeal a disciplinary action and/or decision made in reference to the Satisfactory Academic Progress policy, must submit a typed letter to the Program Director. This letter must contain information about the student's reason regarding the action and/or decision and reasons why the student is wishing to appeal. Students must provide supportive documentation along with their letter in order to support their position and any mitigating circumstances that may have existed. The Program Director will hear any student who disagrees with a SAP decision, on an appointment basis only.

The student will be notified of the Program Directors decision within fifteen (15) business days following the receipt of the student's appeal letter, additional time may be taken to thoroughly review student's appeal. A student, who wishes to appeal any SAP decision made by the Program Director, must submit a typed letter to the President with supportive documentation explaining the reason why the student is wishing to appeal the decision. The President will notify the student within fifteen (15) business days of the receipt of the letter, additional time may be taken to thoroughly review student's appeal. The Presidents decision shall be final.

### **Reinstatement**

A prior student requesting to be reinstated as an active student, based on whatever reasons or circumstances, should do so in writing. Supportive documentation and/or information concerning any mitigating circumstances should be noted in the request. The requesting prior student shall be notified of the Reinstatement Review within 5 days following the decision of School Director.

### **Changes in Enrollment**

Eligibility for financial aid may be tied to the number of clock hours or credits hours enrolled. Please remember that dropping a class or classes, or not fulfilling required clock hours of attendance in a clock hour program may affect a student's financial aid eligibility within a term, and may also affect his/her eligibility to continue to receive assistance. For additional information, please contact the Financial Aid Office.

### **Leave of Absence (LOA)**

NEW YORK MEDICAL CAREER TRAINING CENTER grants Leave of Absence as per regulation of Higher Education Reconciliation Act (HERA) 2006. Students who requires a leave of absence from the program must do so in writing and be approved by the Director of Academic Affairs prior to leave the program. In one academic year, the total days in a leave of absence MUST NOT exceed 180 days.

The Office of Academic Affairs uses faculty inputs, registration and attendance records to track and monitor students who have repeated courses, pass/fail courses, incompletes, withdrawals and absences. The financial aid office is notified about these students at the end of each term/semester.

### **Rules and Regulations**

#### **Attendance**

It has become crystal clear that class attendance is the most important factor in student success (course completion and graduation). In order to be fair to all involved, and to show respect for yourself, your classmates, your instructor, and ultimately your future employer, good attendance is a necessity.

Perfect attendance is expected of each student, just as an employer expects perfect attendance from an employee. Satisfactory attendance is vitally important and is a requirement of all students.

All absences are recorded and made a part of the student's permanent record. Students are responsible for notifying the Instructor or administration when they are to be absent or tardy.

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Excessive absenteeism of greater than 20% in any class or as a whole is not acceptable and is grounds for disciplinary action. Generally, students will be allowed to miss no more than 5 class days in any six-week period. On the 6th absence the student may be dropped from the class and must wait until it is offered again to retake it.

Any student missing eight (8) consecutive days of scheduled classes will be dismissed from school, unless the student is on an approved Leave of Absence.

The student will also be charged for each class that must be repeated due to forced withdrawal or due to failure of a class associated with poor attendance (See tuition & fees for details on these charges). Medical Training College, Inc. may take into consideration absences that may not be required to be made up in order to receive course credit.

Legal and school holidays, breaks, and class cancellations (i.e. weather conditions, etc.) are not included in calculations for class attendance and therefore are not considered as days of absence.

### Tardiness

Failure to report for class when the class begins or leaving before class ends is classified as tardy. Tardiness two times in one grading period will be charged as one hour of absence. A tardy of more than 15 minutes will be charged as one hour of absence. If after initial reprimand the tardiness continues, the student may be suspended or terminated, subject to extenuating circumstances, the student's progress, and the discretion of the Director.

While it is preferable that all students report to the institution for exit interviews upon withdrawal from courses, the student receiving Department of Veterans (DVA) benefits must report to the institution immediately upon withdrawal or dropping from courses.

### Make-Up Work

Classroom/Lab -Make-up work may be assigned to enable a student to progress in a timely manner. Scheduling of make-up work is left to the discretion of each Instructor. It is the student's responsibility to acquire any and all work missed and be ready for upcoming tests or assignments. Regardless of whether students are allowed "make-up work," students are responsible for all course material taught.

### **Completion of Degree Requirements**

The student is expected to complete all program requirements as stipulated in the enrollment agreement. The Office of Academic Affairs provides a report of

all financial aid and Title IV funds recipients who have fulfilled all degree or certificate requirements.

### **Appeals**

Appeals are rarely granted and require sufficient documentation.

### **Documentation**

As with any use of professional judgment, adequate documentation is critical. Since third parties may sometimes be used to document the mitigating circumstances surrounding a SAP appeal, the following provides some acceptable documentation that may be submitted in support of an appeal. Some examples might include but are not limited to:

- A. Newspaper obituaries or death certificates to substantiate deaths
- B. Physician's statement to substantiate illness or accident
- C. Statement from clergy or family member who knows the student's situation
- D. Statement from academic advisor or professor

### **Regaining Eligibility**

As per section 668.16(e)(6) of the HEA 1965, a student not making SAP may re-establish eligibility on his or her own, either because an appeal was denied or because he or she did not submit an appeal.

A student can re-establish eligibility if he/she securing the cumulative grade point average 2.0 before or during the Title IV aid period by completing incompletes and receiving a letter grade. The student will then resume receiving aid for the current aid period after re-establishing eligibility.

The Office of Academic Affairs provides a report to the financial aid office once a student has re-established Title IV eligibility because he or she is making acceptable SAP. It is also the responsibility of the student to notify the financial aid office or the bursar's office. The aid office reviews student's SAP and process all Title IV aid that the student is eligible for. The office prepares the award package, contact student via telephone or email, completes all required paperwork and initiate processing of Title IV aid with the school's third-party service provider ECM.

### **Treatment of Transfer Credits**

#### **Transfer of Credits from Other Institutions**

Credit for courses or degrees completed at another institution of a student enrolling at NEW YORK MEDICAL CAREER TRAINING CENTER will be subject to approval first by the Academic Deans with final approval from the School Director.

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The student is responsible for having an official transcript from previous institution mailed directly to New York Medical Career Training Center. Unofficial transcripts will not be accepted.

NEW YORK MEDICAL CAREER TRAINING CENTER will only accept 25% of credits transferred from a previous institution.

Student must have received a grade of "C" or better in the course in order for the credit to be considered.

Only credits earned within 2 years prior to enrollment at NEW YORK MEDICAL CAREER TRAINING CENTER will be considered.

All requests for transfer of credits must be made prior to or within the first five (5) weeks of the start of school.

NEW YORK MEDICAL CAREER TRAINING CENTER Diploma students will follow the above transfer of credit policy.

All students will be notified in writing of any credits accepted as transferable.

### **Transfer of Credits to Other Institutions**

NEW YORK MEDICAL CAREER TRAINING CENTER is accredited by the Commission of the Council on Occupational Education. Our mission is workforce development. While we encourage the pursuit of higher learning, credits earned at this institution may not transfer to another institution. The decision to accept transfer credits is determined at the discretion of the receiving institution.

### **Transfer of Students Between Programs**

Any student interested in transferring from one program to another within the institution (i.e., from the Medical Assistant Program to the Practical Nursing Program) must seek counseling and approval from the School Director or Program Director. A meeting with the student is arranged to discuss how the transfer will affect the student academically and financially. Based upon this meeting, the School Director may approve or deny the student's request. If approval is granted, the student must first be officially withdrawn from the current program before starting the new program.

### **Change of Address**

At any time that a student's residence, mailing address and/or phone number changes, it is the responsibility of the student to inform NEW YORK MEDICAL CAREER TRAINING CENTER of the new address/telephone number. The efforts of the school depend upon accurate information. The student must obtain a Change of Address form from the Office of Academic Affairs and submit the correct information. NEW YORK MEDICAL CAREER TRAINING CENTER will not be responsible for any information not received by the student if a change of address form has not been turned in.

## **SECTION J:**

### **RETURN OF TITLE IV**

The return of Title IV funds requirement is a complex process involving a great deal of interoffice cooperation and coordination at New York Medical Career Training Center and between NEW YORK MEDICAL CAREER TRAINING CENTER and ECM. The Office of Academic Affairs is designated as contact points for students who wish to withdraw. Inter-Office email may be used to communicate that information to faculty, program office, bursar's office and the office of financial aid. The Office of Academic Affairs determines the withdrawal date and reports it to other institutional offices and the Department of Education. The Office of Financial Aid calculates the return of Title IV funds using federal formulas, notifies ECM in writing to complete recovery of Title IV funds to specific program funds, notifies the student of his or her obligation to repay funds if applicable, tracks the repayment, and refers overpayments to ED. It also offers the student any earned post-withdrawal disbursement and follow procedures and policies pertaining to this indicated in the award notification part of the manual. A student who has completed at least one class within the payment period or period of enrollment but drops other classes is treated as having changed enrollment status rather than as having withdrawn as per section 668.22(a)(1) of HEA 1965. The award package must be revised based on the revised enrollment status and student must be notified about the changed award amounts and status. 2008-09 *FSA Handbook*, Vol. 2, Ch. 6 provides details on R2T4 calculations and regulations.

The date of the New York Medical Career Training Center's determination that a student withdrew is identified through faculty input, student's failure to return from an approved leave of absence, student's verbal or written notification to any office such as Office of Academic Affairs, Office of Financial Aid etc.

In the event of any unofficial withdrawals, R2T4 calculations must be done within 45 days from the date of determination of such withdrawal. The date of determination must occur within two weeks from the last day of attendance.

All enrolled students are notified through New York Medical Career Training Center's catalog about the withdrawal process and the student's rights and responsibilities including how a student reports the intent to withdraw and how the student begins the withdrawal process.

### **Withdrawal Date**

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The faculty is required to take attendance and notify the Office of Academic Affairs if a student has stopped attending class without any notice for 3 (three) consecutive scheduled class days. The Office of Academic Affairs monitors attendance of all enrolled students. It will contact student via email, phone call and letter. If no response is received within the following week, the school will assume the student has unofficially withdrawn. The office of Academic Affairs will determine the withdrawal date which would be no later than two weeks from the last day of attendance. However, if the student responds, the official withdrawal date will be the date on which student notifies school via any means of communication. A student who wishes to withdraw from school for compelling personal reasons should notify the Director of Academic Affairs in writing stating the reasons for withdrawal and whether or not the student intends to return at a later date to pursue a program of study. For all clock hour programs, an attendance roster is mandatory. All documentations for a withdrawn student will be kept on student's file in the office of financial aid and academic affairs.

NEW YORK MEDICAL CAREER TRAINING CENTER grants Leave of Absence (LOA) as per regulation of Higher Education Reconciliation Act (HERA) 2006. Students who requires a leave of absence from the program must do so in writing and be approved by the Director of Academic Affairs prior to the leave. If a student does not return from his/her LOA, the Office of Academic Affairs will notify the Office of Financial Aid. The school will assume the student has unofficially withdrawn on the last date of attendance before the LOA. This begins the withdrawal process. The office of Financial Aid will complete the R2T4 (Return to Title IV) process as per regulations as described in the manual.

### **Formula Calculation**

The New York Medical Career Training Center's Financial Aid Office is required by federal statute to recalculate federal financial aid eligibility for students who withdraw, drop out, are dismissed, or take a leave of absence prior to completing 60% of a payment period or term. The federal Title IV financial aid programs must be recalculated in these situations.

If a student leaves the institution prior to completing 60% of a payment period or term, the financial aid office recalculates eligibility for Title IV funds. Recalculation is based on the percentage of earned aid using the following Federal Return of Title IV funds formula:

Percentage of aid earned = the number of scheduled hours in the payment period divided by the total hours in the payment period as per the school's attendance.

If this percentage is greater than 60%, the student earns 100% of the disbursed Title IV funds or aid that could have been disbursed.

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If this percentage is less than 60%, then the percentage earned is equal to the calculated value.

Funds are returned to the appropriate federal program based on the percent of Percentage of aid earned = the number of completed days in the payment period divided by the total days in the payment period.

Aid to be returned = (100% minus the percent earned) multiplied by the amount of aid disbursed toward institutional charges. If a student earned less aid than was disbursed, the institution would be required to return a portion of the funds and the student may be required to return a portion of the funds. All Title IV funds that the institution must return will be made no later than 45 calendar days after the date the school determines that the student withdrew.

When Title IV funds are returned, the student may owe a balance to the institution.

If a student earned more aid than was disbursed to him/her, the institution must send written notification to the student (or parent for PLUS loan funds) to offer a post-withdrawal disbursement for any amount not credited to the student's account no later than 30 calendar days after the date that the school determines that the student withdrew. The institution is required to make a post-withdrawal disbursement within 45 days of the student's date of determination that they withdrew for grants and 180 days of the student's date of determination that they withdrew for loans.

Refunds are allocated in the following order:

- Unsubsidized Federal Stafford Loan
- Subsidized Federal Stafford Loan
- Federal Parent (PLUS) Loan
- Federal Pell Grant
- Federal Supplemental Opportunity Grant
- Other Title IV assistance
- State Tuition Assistance Grants (if applicable)
- Private and institutional aid
- The student

Federal Work Study funds are never subject to R2T4 calculations because they represent payroll earned by the student for work performed.

The following is a step-by-step process that is followed in all R2T4 calculations

**Step 1:** Determine the percentage of aid earned by calculating the percentage of the scheduled hours divided by the total hours in the period.

**Step 2:** Determine the amount of earned aid by applying the percentage to the total Title IV aid that was or could have been disbursed.

- Step 3:** Determine the amount of unearned aid by subtracting earned aid from disbursed aid **or** determine the amount of a post-withdrawal disbursement by subtracting disbursed aid from earned aid.
- Step 4:** If unearned funds must be returned, determine the schools and the student's shares; **or** if a post-withdrawal disbursement is due, determine the sources from which it will be funded.
- Step 5:** If unearned funds must be returned, allocate unearned aid to programs from which student was funded; **or** if a post-withdrawal disbursement is due, send student applicable notification.
- Step 6:** Return the institution's share and any funds repaid by the student or refer the student to ED; **or** make the post-withdrawal disbursement.

The department of Education provides return of Title IV funds worksheets in Volume 2, Chapter 6 of the FSA Handbook. It has also developed software that automates the calculation. This software can be downloaded via <http://www.sfadownload.ed.gov/ReturnT4Funds.htm>. These are used to calculate all R2T4 calculations. A copy of the worksheet in the event of manual calculation and a computer printout in the event of automated calculation is placed in student's file for records. The office of financial aid performs all R2T4 calculations as it has all Title IV award and institutional charges information which are required in the calculations.

#### Post-Withdrawal Disbursements

In the event a student is eligible for a post-withdrawal disbursement based on student's budget, awarded financial aid and Title IV funds and R2T4 calculations, a post-withdrawal disbursement must be made only after the following conditions are met.

1. Student and parents were in most cases verbally notified of the availability of post-withdrawal disbursements by the Office of Financial Aid within one week from the date of R2T4 calculation was performed.
2. Student and parents in most cases verbally notified the Office of Financial Aid within a reasonable time indicating their acceptance of available post-withdrawal disbursement amounts. The reasonable time refers to allowing sufficient time to school to process a post-withdrawal disbursement within the deadlines set by the Department of Education.
3. Student has outstanding institutional charges that are due and wants to pay off those charges by applying his/her post-withdrawal disbursement.
4. Student/Parents completed all necessary paperwork related to such post-withdrawal disbursement within a reasonable time.

The Office of Financial Aid must track the notification and authorization to make the disbursement and meet deadlines as prescribed by ED. A school

must process Title IV aid within 120 days from the last day of the enrollment period.

The post-withdrawal disbursement must be applied to outstanding institutional charges before being paid directly to student. See sections 668.22(a)(4) of HEA 1965 and GEN-04-03 for details on Post-Withdrawal Disbursement regulations.

### **School Refund Components and Policy**

New York Medical Career Training Center's institutional refund policy in accordance with the accrediting agency and state education department policies is expressed as a schedule of revised institutional charges incurred by students who withdraw, based on the length of time they remain enrolled or the consumption of services. The refund policy is entirely the purview of Bursar's office. Bursar's Office is responsible for developing, updating, and distributing the policy to all offices and students. New York Medical Career Training Center includes the institutional refund policy as a part in the 'Enrollment Agreement' form which applies to all NEW YORK MEDICAL CAREER TRAINING CENTER students.

A student (or in the case of student under legal age, his/her parent or legal guardian) who cancels within 7 days of signing the enrollment agreement receives 100% refund all money paid including the registration fees. A student (or in the case of student under legal age, his/her parent or legal guardian) who cancels after 7 days of signing the enrollment agreement, but prior to beginning classes, receives a 100% refund of all monies paid except the registration fees.

1. This policy is applicable whether or not a student has begun training by physically attending the classes.
2. The date of cancellation will be determined by the postmark on written notification or by using the date the cancellation information was delivered to any school administrator in person or via phone call.
3. A student whose enrollment is cancelled by school will have all monies returned.
4. The date of withdrawal for a student who is on approved Leave of Absence (LOA) shall be the earlier of the date of expiration of the LOA or the date the student notifies the institution that the student will not be returning.

After the beginning of the enrollment period, a student is liable for the cost of textbooks and supplies provided by New York Medical Career Training Center. Textbook and supplies become personal property of the student when received and accepted by him/her. In addition, the student is liable for tuition charges for the term during which the student withdrew or was dismissed including all other outstanding charges from prior terms, as per the following schedule.

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### A. First and Second Terms

If withdrawal or dismissal occurs.....	student is liable for
Prior to or during the first week .....	0% of the total tuition charges for the term
During the second week.....	20%
During the third week.....	35%
During the fourth week.....	50%
During the fifth week.....	70%
After the fifth week.....	100%

### Subsequent Terms

If withdrawal or dismissal occurs.....	student is liable for
Prior to or during the first week .....	20% of the total tuition charges for the term
During the second week.....	35%
During the third week.....	50%
During the fourth week.....	70%
After the fourth week.....	100%

All refunds based on the above policy are calculated by the Bursar's Office manually. All refunds due to student shall be made within 30 days of formal cancellation by the student or formal dismissal by the school. The student is notified of the results of the refund calculation and notified of his/her liabilities in writing. A follow-up phone call must be made by the Bursar's Office. The financial aid office performs the Title IV refund calculation and determines student's and institution's liability for program specific return of overpayments to the Department of Education.

### **Institutional Refund Repayment Appeals**

New York Medical Career Training Center does not have any provisions for students to appeal the amount of an institutional refund, the amount of outstanding charges, or the repayment process. However, the student may contact Bursar's Office and speak to a representative to further discuss their outstanding charges if he/she wishes to do so.

## **SECTION K;**

### **FRAUD**

New York Medical Career Training Center will report any student fraud to the Inspector General. The school will make every attempt to verify any suspect  
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information and speak with the student/parent before such a report is made. New York Medical Career Training Center finds these actions unacceptable and will withdraw any student whom it finds guilty of fraud.

**SECTION L:**

**APPENDICES**

Forms

Provide copies of all forms the school uses for the administration of all Title IV programs. Such forms might include, but are not limited to:

- a. Appeal forms for professional judgment (e.g., satisfactory academic progress appeals, budget adjustments, change of dependency status, etc.)
- b. Application forms (e.g. FAFSAs, institutional applications, scholarship forms, state aid forms, outside aid forms etc.)
- c. Award notifications
- d. Revised award notifications
- e. FERPA authorization consent (student release ) forms
- f. Satisfactory academic progress correspondence
- g. Verification forms
- h. Samples of tax forms (e.g., 1040, 1040A, 1040EZ, Telefile forms, etc.)
- i. Samples of alternative tax forms (e.g., tax transcripts, electronic filings, etc.)
- j. Samples of untaxed income documentation (e.g., W-2 forms, Social Security Administration forms, child support documentation, etc.)
- k. Authorization or Waiver forms for cash management requirements and refunds
- l. Return of Title IV funds calculation worksheets
- m. Return of Title IV funds correspondence to students/parents
- n. Overpayment referral forms
- o. Withdrawal forms
- p. Leave of Absence Request Form
- q. I-9 forms for student employees (for FWS or CWS only)
- r. Eligible non-citizen secondary confirmation form (i.e., G-845S)