



# **CTK HEALTHCARE AND CARRIER INSTITUTE**

**2023**

## **Plans & Procedure Manual**

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## GENERAL ADMINISTRATIVE REQUIREMENT

This **financial aid policies and procedure manual** is prepared for CTK Healthcare and Career Institute (hereafter CTK) to serve as a guide for the staff for administering and monitoring Title IV financial aid process. CTK must keep update on administration of Title IV programs in compliance with federal, state, and institutional regulations. Financial Aid Officer (FAO) at CTK is expected to administer all financial aid policy based on their governing regulations. CTK is committed to follow the Federal guidance and use professional judgement in the absence of policy or procedure that addresses a particular issue. The manual is also useful to other offices for appeal and academic review, financial and compliance auditors, state, and federal program reviewers.

### Financial Aid Reference documents

CTK continuously used various sources of information related to financial aid regulations and policies, laws and policy guidance of Department of Education (ED) during the preparation of this manual. This manual will be review and updated annually with revision as needed.

The Financial Aid department of CTK is continuously updated with new laws, policies and regulations that is related to the institution's policies and procedures. The following documents and publications, but not limited, were referred to develop this manual.

- a. Dear Colleague/Partner Letters
- b. EFC Formula Guide
- c. Electronic Announcements (IFAP Letters)
- d. Federal registers
- e. FSA Handbook
- f. Higher Education as Amended
- g. Newsletters from professional associations (Such as NASFAA and SASFAA)
- h. Policy Bulletins
- i. Title IV regulations and updates
- j. U.S. Department of Education Audit Guide



## Philosophy and Policies

### Mission

*To offer quality professional trainings in Healthcare, Information Technology and Business related disciplines.*

Financial Aid is vital in supporting students to achieve their educational goals. Financial Aid department is responsible for providing information, guidance and advice to students in securing student financial aid including grants, loan and other scholarship.

### Personnel and Financial Aid office

The Admission and Financial Aid Officer (FAO) is responsible for administering and monitoring activities pertaining to Title IV processing including awarding, cancellation, exit counselling and returns of funds. Additionally, the FAO is responsible for counselling, packaging, completion of verification process and resolve FAFSA issues related to 'C' code. The third-party service provider (FAME Inc.) FAO processes of all Title IV Financial Aid of student applicants. The Finance office is responsible for generating the reports of Title IV applicants and monitors for 14 days to comply with the regulations 668.22(a)(4)(ii) and 668.165(a) (2)-(5) of HEA 1965.

The Financial Office is open for all students and their parents during all around the year except national holidays.

Our of Operation

**Monday – Friday**

**9:00 am – 6:00 pm**

**Phone: (214) 441 3556**

**Fax: (972) 570 2221**

Email: [ctkhealthcareservices@gmail.com](mailto:ctkhealthcareservices@gmail.com)

URL: [www.ctkhealthcare.com](http://www.ctkhealthcare.com)

CTK has sufficient number of qualified personnel to assist in processing Title IV grants applications. These personnel provide guidance and assistance to student for securing maximum financial aid opportunities related to Title IV, loans, programs, student employment and payment options.

## Policies and Procedures development responsibilities

CTK School Director is responsible for development of all policies and procedures pertaining to run the school including Title IV and their timely manner revision, review, and updates. The director, chief administrative officer, and chief financial officer are responsible for ensuring all staffs, faculties, and students of any changes in current policies and procedures or the new development. Particularly, the updates and changes happen when federal or state made any changes in exiting regulations or announce the new ones. Otherwise, the policies and procedures are reviewed annually during the Board Meeting and notified to all staffs and faculties via email or **internal memorandum**. The polices and procedures are also available in our school website [www.ctkhealthcare.com](http://www.ctkhealthcare.com).

Chief Admission Officer is responsible to get updated with Information for Financial Aid Professionals (IFAP) website as IFAP is related to Title IV program. Schools participating title IV program should have access to IFAP website. To updates with new rules, regulations, and laws, CTK subscribes news or information from multiple agencies including DOE, IFAP, RGM's NWs/monthly issues.

## Administration and organization for Title IV programs

Multiple Department including financial aid, admissions, and business coordinate smoothly to ensure the compliance with Title IV programs and regulations while processing the financial aid application.

## Essential duties of key personnel

### Director

The School Director is the chief executive officer of the institution, overseeing all operations of the School, from academic affairs, to enrollment and student life, and is responsible for setting future goals and directions for the School. He is also responsible for implementing the policies and procedures consistent with the Institution. The Director meets with staff and faculty once each year for a policy review, holds regular office hours, and is available to the CTK community.

The Director may adopt new or revised administrative policies and procedures on the Director's own initiative, or from the recommendation of faculty or administrative staff, without prior approval of

the management team, provided that any changes in administrative policies and procedures do not conflict with School's policy.

The Director may further delegate this authority unless specifically prohibited from doing so by explicit statement in a policy adopted by the Institute.

1. The Director's responsibilities include:
2. Oversight of the quality of the academic and support programs of the Institute;
3. Oversees of the relationship between students and the administration;
4. Oversees the management of the School's finances with the assistance of the Finance Director;
5. Handles all aspects of the administration of the School's personnel;
6. Oversees the operation and maintenance of real and personal property under the jurisdiction of the School;
7. Guides and supervises all Alumni activities;
8. Consults and cooperates with the Institute and other educational groups on various matters, including planning for the future development of the Institution;
9. Represents the School in matters of public affairs and networking;
10. Establishes and maintains a centralized system for fundraising, advancement, and development of the School; and
11. Meets annually with the management team, staff and faculty at annual policy meeting to ensure that the School maintains all regulatory policies and reviews and revises policies as necessary.
12. Build a system to exercise proper management, financial controls, and business practices
13. Conducts a monthly visual inspection, and subsequent evaluation of the facility, and recommends
14. reviewing of the Emergency Injury and Illness Plan as needed.
15. Implement, review, and correct if needed, all the plans for student services, employee services, Media Services, Emergency and Safety plans including ADA compliance with federal codes and procedures all business related services.

### **Implementation of policy or procedures**

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The Director shall appoint an administrative staff to assist in the performance of the functions and duties to the Director and may re-delegate authority as the Director deems necessary to selected administrators.

The Director shall adopt a procedure for developing and adopting new or revised administrative policies and procedures. This procedure shall be designed to ensure participation and discussion by those members of the Institution's community affected by the proposed administrative action. Administrative policies and procedures shall become effective on the date of adoption by the Director, or as otherwise specified.

### **Chief Admission officer**

The Institution's CAO oversees all operations of the School in line with School Director that includes academic affairs to students enrollment, setting future goals and directions for the School. Under the supervision of School Director CAO implements the policies and procedures consistent with the Institution. The CAO regularly meets with staff and faculty periodically and convey the directions, suggestions and feedback of the Director.

Under the direction of the school Director CAO may adopt new or revised administrative policies and procedures, or from the recommendation of faculty or administrative staff, without prior approval of the management team, provided that any changes in administrative policies and procedures do not conflict with School's policy.

The Chief Administrative Officer (CAO) is responsible for managing the day-to-day operations of a company and is in charge of specific departments (such as finance, HR, and sales), reporting directly to the school director.

### **Chief Administrative Officer**

1. Working in a team with Director to devise strategies and policies to meet company goals.
2. Managing and supervising the day-to-day operations of various departments, such as finance, sales, HR, and marketing.
3. Managing budgets, hiring and contracting, and business negotiations.
4. Analyzing audit reports and formulating improvements to departmental workings.
5. Compiling performance reports and reporting to the CEO and board of directors.

6. Ensuring all IRS laws, government regulations, and SEC rules are met.
7. Oversight of the quality of the academic and support programs of the Institute;
8. Oversees of the relationship between students and the administration;
9. Oversees the management of the School's finances with the assistance of the Finance Director;
10. Handles all aspects of the administration of the School's personnel;
11. Oversees the operation and maintenance of real and personal property under the jurisdiction of the School;
12. Guides and supervises all Alumni activities;
13. Consults and cooperates with the Institute and other educational groups on various matters, including planning for the future development of the Institution;
14. Represents the School in matters of public affairs and networking;
15. Establishes and maintains a centralized system for fundraising, advancement, and development of the School; and
16. Meets annually with the management team, staff and faculty at annual policy meeting to ensure that the School maintains all regulatory policies and reviews and revises policies as necessary.
17. Build a system to exercise proper management, financial controls, and business practices
18. Conducts a monthly visual inspection, and subsequent evaluation of the facility, and recommends reviewing of the Emergency Injury and Illness Plan as needed.
19. Implement, review, and correct if needed, all the plans for student services, employee services, Media Services, Emergency and Safety plans including ADA compliance with federal codes and procedures all business related services.

### **Chief Financial Officer**

1. Develops financial well-being of School by providing financial projections and accounting services, preparing growth plans, and directing staff.
2. Accomplishes finance human resource strategies by determining accountabilities; communicating and enforcing values, policies, and procedures; implementing recruitment, selection, orientation, training, coaching, counseling, disciplinary, and communication programs; planning, monitoring, appraising, and reviewing job contributions; and planning and reviewing compensation strategies.

3. Develops finance organizational strategies by contributing financial and accounting information, analysis, and recommendations to strategic thinking and direction and establishing functional objectives in line with organizational objectives.
4. Establishes finance operational strategies by evaluating trends; establishing critical measurements; determining production, productivity, quality, and customer-service strategies; designing systems; accumulating resources; resolving problems; and implementing change.
5. Develops organization prospects by studying economic trends and revenue opportunities; projecting acquisition and expansion prospects; analyzing organization operations; identifying opportunities for improvement, cost reduction, and systems enhancement; and accumulating capital to fund expansion.
6. Develops financial strategies by forecasting capital, facilities, and staff requirements; identifying monetary resources; and developing action plans.
7. Monitors financial performance by measuring and analyzing results, initiating corrective actions, and minimizing the impact of variances.
8. Maximizes return on invested funds by identifying investment opportunities and maintaining relationships with the investment community.
9. Reports financial status by developing forecasts, reporting results, analyzing variances, and developing improvements.
10. Updates job knowledge by remaining aware of new regulations, participating in educational opportunities, reading professional publications, maintaining personal networks, and participating in professional organizations.
11. Accomplishes finance and organization mission by completing related results as needed.
12. Oversee the need and purchase of media items.
13. Make inventory of all learning resources including books, computers, flash drives, flash cards, Dose evaluation materials, supporting materials, reference books.
14. Make sure all programs have the supplies and equipment required for educational purpose including CNA: Nursing beds, Wheel chairs, Walkers; Medication Aide: Med Cart; PCT: Venipuncture needle, EKG machine, EMR software, Glucometer; and Pharmacy Technician: Laminar Flow, Weighing Machine, Label Printer
15. Assess safety standards of all equipment supplies used for educational programs.

### **Financial Aid Director (FAD)**

1. Analyzes and evaluates financial viability of students and families and provides advice and counsel regarding available financial aid opportunities, eligibility requirements, and the application process.
2. Assist with PPA agreement between third party and process of creating G5, PELL, and Direct Loan accounts
3. Establish and monitor payroll
4. Reviews and assesses eligibility of applications for financial aid; exercises professional judgment to determine whether adjustments should be made.
5. Inform students about their ethical responsibilities regarding federal financial loan including the Direct loan.
6. Reviews for accuracy and provides signature approval/disapproval of loan applications, promissory notes, and other financial documents.
7. Award and disbursement of financial aid and describe the repayment plan compliance with current federal law during the exit counselling.
8. Conducts orientations, and entrance and exit interviews, in accordance with university, state, federal, and other agency guidelines.
9. Calculate return of Title IV funds (R2T4), if it applies to any students, with required time frame according to federal laws and regulations, and submitting calculations to finance office
10. Return of Title IV (R2T4), if it applies, and authorize post-withdrawal disbursements to students in required time frame according to federal laws and regulations
11. Completing fiscal reports for federal funds and FISAP
12. Maintain records consistent with Generally Accepted Accounting Principles (GAAP),
13. Responds to inquiries and researches and resolves problems related to transactions handled by the unit; serves as liaison with other constituencies in the resolution of day-to-day administrative and operational issues.

14. Provide information, in person, on the telephone, and through electronic Chat, to students, prospective students, and families regarding student financial aid, admissions, CTK account balance, and registration status.
15. Serves as liaison with state, federal, and other agencies; keeps abreast of student assistance opportunities and program regulations.
16. Oversees the collection, management, and reporting of data in accordance with the objectives of the position; participates in the development and implementation of data management systems and procedures, as appropriate.
17. Implements, coordinates, and oversees one or more specific administrative programs and/or service areas, as assigned.
18. Trains and serves as an operational resource to other staff and/or students, as appropriate; may supervise student employees or lower-level staff.
19. Conducts workshops and/or presentations to students, parents, and/or other interested parties on financial aid policy and procedural issues.
20. Provides academic advisement and crisis intervention referrals; arranges for tutorial support, as necessary.

### **Instructors**

1. Teach the classes of responsibilities as per the guidelines set by TWC and school catalog.
2. Maintain professional standards and teach effectively for the program and CTK Healthcare.
3. Set up excellent assessment system for students.
4. Participate in professional development and make recommendations to the school management regarding on-going training for teachers and Program Directors.
5. Proctor students for all tests, quizzes, lab work, etc. as per the guidelines set by CTK Healthcare;
6. Establish and maintain high standards for student passing rates on licensure exams.
7. Maintain the safety of students while doing lab work; Take responsibility to ensure the safety of the supplies and instructional materials, as required by the manufacturer. Ensure to follow the MSDS sheet, whenever necessary, to use of instructional chemicals
8. Maintain high standards regarding student evaluations;



9. Maintain student academic records and transcripts, along with attendance records, as per School policy;
10. Maintain minimum number of office hours to meet with students;
11. Support students in their pursuit of a professional career;
12. Be proactive in the effort to educate students in healthcare disciplines;
13. Assist in the Career Services and Job Placement efforts for the students; and
14. Communicate with health-related and educational facilities in the Dallas-Fort Worth area on behalf of CTK.

## Student Eligibility

### Student Eligibility

Consumer information at CTK home page (e.g., Financial Aide, Manuals) provides supplementary information that has been provided in our schools' Campus Catalog and other publications including, brochure, handbooks, manuals etc. School website may indicate the whereabouts required documents, either in one of the schools' publications, on the school website, or on a third-party website (e.g., the College Navigator website maintained by the National Center for Education Statistics). Current and perspective students get information regarding the availability and location of consumer information in accordance with certain state and federal laws applicable to our schools. For assistance with any of the consumer information discussed herein, prospective and current students may contact the Campus Director during normal business hours. A paper copy of consumer information disclosures and school publications are available on request.

## Admissions

### Admissions Policy

CTK is committed to follow all regulations/requirements in compliance with Federal Government in pursuant to Title VI of the Civil Rights Act of 1964 and regulations that prospective students will not be denied admission on the ground of race, color, national origin, sex, handicap, age or veteran status (except where age, sex or handicap constitute a bona fide occupational qualification necessary to proper and efficient administration). CTK admission policy is in compliance with Department of Education, Council on Occupational Education (COE).

Admission officer verifies the GED or high school diploma of all students to establish the validity of the document. In case of failing to validate credential, there is no appealing process for admission in CTK.

### **Admission Requirements**

Students can apply for enrollment throughout the calendar year.

1. Students should be required to complete the pre enrollment form and will be evaluated by admission officer/admission committee.
2. US citizens and resident aliens are eligible to apply for admission. An adult (18 years or above) can apply directly for admission. However, a person with minimum age of 17 years can apply with written parental or legal guardian permission for admission.

Application for Admission must include the following documents:

3. A completed Admission Application. An application must be submitted prior to enrollment in classes. Applications completed by a third party on behalf of the candidate will not be accepted. Students who owe any fee or tuition will not be permitted to enroll until the debt is settled.
4. A non-refundable application fee of \$20.00 should be paid.
5. Every student be required to attend a New Student Orientation session and register for classes.
6. Show the original diploma or High School transcript from an accredited high school. OR General Education Development (GED): Provide official copies of your GED. OR, college transcript or Diploma.
7. CTK accepts foreign high school diploma or transcript if it is equivalent to a U.S. high school diploma. The proof of documents related to completion of secondary education from a foreign country must be officially translated into English and officially certified as the equivalent of high school completion in the United States.

8. CTK does not accept Ability to Benefit (ATB) alternatives to qualify for Title IV program Ability to Benefit (ATB)- Note: Due to the passage of Consolidated Appropriations Act of 2012, students who do not have a high school diploma or equivalent and did not complete secondary school in a home-school setting can no longer gain eligibility for Title IV, HEA funds by passing an “ability-to-benefit” test.)
9. Student can be admitted in “Conditional Status”. However, student cannot be graduated, failure to submit the missed items if s/he miss to provide any document per the program enrollment requirements.

For the enrollment, please contact at CTK Healthcare and Career Institute, 3455 N. Beltline Rd, Suites 203, Irving, TX 75062-7861, (214) 441 – 3556.

### **Diploma mill definition - An entity that**

1. Charges someone a fee and requires him to complete little or no education or coursework to obtain a degree, diploma, or certificate that may be used to represent to the general public that he has completed a program of secondary or postsecondary education or training; and
2. Lacks accreditation by an agency or association that is recognized as an accrediting body for institutions of higher education by the Secretary (pursuant to Part H, Subpart 2 of Title IV) or a federal agency, state government.

### **Admission Process**

To be accepted into all programs applicants must

- a. Tour the facility and attend an informal Interview. Parents and spouses are encouraged to attend.
- b. complete a pre-enrollment form
- c. complete a personal interview with the school director or enrollment representative
- d. an application for admission
- e. be at least 18 years of age. If a student is 16 or 17 years of age during admission, a legal guardian also has to sign in the application for admission.
- f. present proof of secondary education (high school diploma or college transcript or GED

certificate)

- g. not be listed as unemployable on the Employee Misconduct Registry (EMR), or
- h. not have been convicted of a criminal offense listed in the Texas Health and Safety Code §250.006

Prospective students will not be denied admission on the basis of race, color, national origin, sex, handicap, age or veteran status (except where age, sex or handicap constitute a bona fide occupational qualification necessary to proper and efficient administration).

For the enrollment, anybody can contact at CTK Healthcare and Career Institute, 3455 N. Beltline Rd, Suites 203, Irving, TX 75062-7861, (214) 441 – 3556.

## Ability-To-Benefit (ATB) Alternatives & Career Pathway

In programs, students may become eligible for Title IV aid through the ATB alternative in one of two ways. If a student first enrolled in an eligible postsecondary program prior to July 1, 2012, the student may enroll in any eligible program and can become eligible through one of the ATB alternatives. However, if a student first enrolled in an eligible postsecondary program on or after July 1, 2012, the student may only become eligible through one of the ATB alternatives if the student is enrolled in an “eligible career pathway program.” See below for more details about eligible career pathway programs.

### The ATB alternatives include

Passing an independently administered Department of Education approved ATB test (see chart at the end of this section). • Completing at least 6 credit hours or 225 clock hours that are applicable toward a degree or certificate offered by the postsecondary institution. • Completing a State process approved by the Secretary of Education. Note: To date, no State process has been submitted for the Secretary’s approval.

**Eligible Career Pathway Programs.** An “eligible career pathway program” means a program that combines rigorous and high-quality education, training, and other services that—

- a. Align with the skill needs of industries in the economy of the State or regional economy involved;
- b. Prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of

August 16, 1937 (commonly known as the “National Apprenticeship Act”; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.);

- c. Includes counseling to support an individual in achieving the individual’s education and career goals;
- d. Includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
- e. Organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
- f. Enables an individual to attain a high school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and
- g. Helps an individual enter or advance within a specific occupation or occupational cluster.

You are responsible for documenting that your career pathway ATB options & Career pathway program meet the above requirements.

Consolidated Appropriations Act of 2016 (Public Law 114-113) DCL GEN-12-09 DCL GEN-16-09 HEA Sec. 484(d) E-Announcement July 9, 2015 ATB tests 34 CFR Part 668 Subpart J (Sections 141–156) E-Announcement June 24, 2015 Revised ATB regulations were published in the Federal Register on Oct. 29, 2010. Guidance on implementation of requirements for tests in languages other than English was given in GEN11-08.

Consolidated Appropriations Act of 2016, On December 18, 2015, the President signed the Consolidated Appropriations Act of 2016, which included the following changes to ATB provisions: •

A revised definition of an eligible career pathway program; and the elimination of the career pathway alternative Pell Grant disbursement schedules. A school’s eligible career pathway program must meet the revised definition in order for students who first enroll in that program during the 2016-17 award year to become eligible for Title IV aid using one of the ATB alternatives. For students who were previously eligible only for Limited Pell Grant awards, schools must now use the Federal Pell Grant Payment and Disbursement Schedules that are published in Dear Colleague Letter GEN-16-01 for the upcoming 2016-17 award year. Transition guidance for the remainder of the current award year will be provided in a forthcoming Dear Colleague Letter on IFAP.

Glossary-Acronyms CFR DCL program(s) meet each of the requirements described above. The Department does not require that you receive approvals or endorsements from a State or local workforce agency to fulfill these requirements, although that may be one way that you document your compliance.

Additional information regarding the requirements for eligible career pathway programs can be found in Dear Colleague Letter GEN-16-09 on IFAP.

Eligibility of Other Students without a High School Diploma (Grandfathered Students). As discussed in Dear Colleague Letter GEN-12-09, students who were enrolled in an eligible program of study prior to July 1, 2012 may continue to establish Title IV eligibility in any eligible program under one of the ATB alternatives by using the following grandfathering test:

Question 1: Did the student attend an eligible program at any Title IV institution prior to July 1, 2012? If yes, the student may use any of the ATB alternatives (as described above) to become eligible for Title IV, HEA student assistance. If no, continue to Question 2.

Question 2: Did the student, prior to July 1, 2012, officially register at a Title IV institution, and is the student scheduled to attend an eligible program? If yes, the student may use any of the ATB alternatives (as described above) to become eligible for Title IV, HEA student assistance. If no, the student may not use the ATB alternatives to become eligible for Title IV, HEA student assistance, unless the student is enrolled in an eligible career pathway program.

For a student who qualifies to use one of the ATB alternatives through enrollment in an eligible program prior to July 1, 2012, you must document how the student qualifies to use one of the ATB alternatives. Such documentation could include documentation from NSLDS that shows a student's prior receipt of Title IV funds, or a transcript or other receipt that demonstrates enrollment in an eligible program.

## **Application Process:**

- Each applicant must submit a completed enrollment form with copies of documents below. The form can be obtained from the from CTK desk
  - Proof of high school graduation (diploma, transcript) or General Education Development (GED)
  - Current Driver's License or State approved ID
  - Social Security Card
- Personal Interview - Each applicant must attend a personal interview with an admission/ financial aid officer. A telephone interview may be considered if the applicant's geographical location and ability to travel to the interview site is a hardship.

## ***Procedure***

- **Responsibilities:**
  - **Admission/Financial Aid Officer:**
    - Greets the prospective student
    - Guide them to complete the pre-enrollment form
    - Obtains a copy of each required document for admission
    - Conducts the entrance interview

- Gives tour of facility
- Allows perspective student to fill out application
- Collect the payments
- **Financial Aid Officer**
  - Ask students for required documents to for FA application and guide them to complete the FA application
  - Discuss the process of FA or reviews the obtained ISSR
  - Reviews the Award letter
- **Admission/ Finance Officer**
  - Provides new student with New Student Packet
  - Copy of enrollment agreement, and orientation dates
  - Remind student of documents to turn in
  - Set appointment date to turn in admission requirements

## Attendance Process

### Attendance and Absences

#### Attendance Policy

In CTK, Students are expected to attend classes as per their enrollment agreement. Students are responsible to clock in and out appropriately to document their attendance. It is every instructor's responsibility to record the attendance of each student in case students miss the opportunity to mark their in and -out time in the attendance sheet. Instructors/support staffs take class attendance and a student must make sure his/her attendance is recorded correctly, as Financial Aid Students must attend a minimum of 67% of the cumulative scheduled hours to maintain SAP and complete the course within the maximum allowed period. It is expected that students should begin to develop the qualities of promptness and dependability from the day they begin their training. Early departures, tardiness, and class cuts will be recorded in quarter-hour increments. A period of 15 minutes will be counted as a quarter-hour of absence. Instructor/support staff should provide the attendance record of each student to the Record officer each week who is responsible to maintain student's records as part of the student's permanent academic record.

Late arrivals may enter school until 15 minutes after class begins, students who are more than 15 minutes late may meet with the School Director to obtain authorization to remain in school for the day. Continued tardiness may result in disciplinary action up to including termination. Students who are going to be absent are expected to call the school prior to the beginning of their scheduled shift.

All absences are recorded and made a part of the school permanent record. The student is responsible for class material and/or tests missed while absent. Students are encouraged not to miss any days. Students who miss 10 consecutive school days (14 calendar days) without communicating with the School Director/Designee may be terminated on the 11th consecutive school day as an unofficial withdrawal.

Students who persist in repeating patterns of absenteeism will be advised and will be subject to appropriate disciplinary action. Students who have excessive absences may be terminated; re-enrollment is at the discretion of the school director.

## **Procedure**

### **1. Responsibilities:**

#### **1. Admission/Financial Aid Administrator**

1. Orientates students on how to clock in and out on orientation day
2. Monitor's daily attendance to ensure student maintaining satisfactory academic progress

#### **2. Instructor**

1. Monitor's daily attendance
2. Attempts to contact student during absences
3. Alerts the Campus Director of students who are approaching 10 or 14 due absences.

#### **3. Financial Aid Administrator**

1. Updates the student's time in the event of errors student's attendance due to technical issues, holidays, weather, or students who forgot to clock in or out.

#### **4. Campus Director**

1. Attempts to contact students who has continuous absences
2. Meet with students who are continuously tardy
3. Populate withdrawal letters for students who fail to follow the attendance policy.



## Leave of Absence Policy

Students who need to interrupt their program of study because of a medical condition, for a Family Medical Leave Act (FMLA) circumstance, active military service, jury duty obligation, or other severe or unanticipated personal circumstance, may make an application for a Leave of Absence. Students experiencing these types of circumstances should discuss with the Director or his/her designee and take a Leave of Absence (LOA). The applicant for the LOA should be making Satisfactory Academic Progress, be current in his or her tuition and fees obligation. Students wishing to take a leave of absence for more than five (5) days shall apply to the director in writing stating the reason for the leave of absence. For valid reason, school director can approve the leave of absence for up to 180 (one hundred eight) class days. To receive the LOA, a student needs to submit documented proof of the reason for the leave of absence.

- Requests for a leave of absence will be made in writing.
- Students may have no more than two leave of absences in a 12-month period.

Students making payments on their tuition remain under that obligation during a Leave of absence.

Student must contact the School the week before the return so that arrangements can be made to accommodate in the classroom. Students returning from a leave of absence will reenter their program at the beginning of the subject they were completing at the time they began their leave of absence. Students who fail to return to class on their schedule date will be dropped from the course.

### Leave of Absence procedures

#### 1. *Responsibilities:*

1. School Director
  1. Receive in writing a LOA application with student signature describing the reasons within two weeks.
  2. Approve the LOA application considering LOA does not exceed 30 days including additional leaves within a twelve-month period.
  3. Instruct admission office for the amendment of the original application for enrollment and make sure it is the same amount days taken in the LOA.
  4. Instruct admission officer to make sure the continuation of class after the approved LOA period
2. Student

1. Submit application for LOA and get approval from School Director.
2. While requesting, make sure it doesn't exceed 30 days with any additional leaves with a twelve-month period
3. Consult with admission for the amendment of the enrollment from
4. Continue the class after LOA period

## TRANSFER STUDENTS

### TRANSFER POLICIES

#### Transfer of students between programs within the institution

If a student who is enrolled in one program at this institution and desires to transfer to another program, he or she may contact the School Director or Academic Dean to discuss the matter. In order to be considered for any transfer, the student must be in good standing in the current training program. For example, the student must have an attendance rate of 80% or above, and must be maintaining a grade of "C" or better in the course work. Any transfer of a training program is evaluated on a case-by-case basis and must be agreed upon by the Admission Committee comprising the Academic Dean, Chief Administrative Officer and the School Director.

#### Transfer of Students to Other Institutions

The transferability of credits and certificate you earn at CTK Healthcare Institute is at the complete discretion of an institution to which you may seek to transfer. . If the certificate that you earn at CTK is not accepted at the institution to which you seek to transfer, you may be required to repeat some or all of your coursework at that institution. For this reason, you should make certain that your attendance at this institution will meet your educational goals. This may include contacting an institution to which you may seek to transfer after attending CTK Healthcare Institute.

#### Transfer of Credits Earned at any Other Institutions

CTK may grant academic credit for courses which have successfully completed the same or substantially the same subjects on a post-secondary level as listed in the Catalog. The student must have earned a grade of "C" or better and the student must have been taking coursework at the postsecondary

level prior to their expected start date. Student should provide the following documents requesting the transfer of credit.

- Request for the transfer of credit
- Copy of transcripts or Diploma
- In exceptional cases, CTK accepts the Skills earned through taking continue education and/or seminar courses from the previous institute

CTK admission committee comprised of Academic Dean, Financial Aid Director and Director of the school, has full authority to evaluate the student's academic credentials to provide credit towards the intended program. Transfer of credit is evaluated on a case-by-case basis. The final decision to grant credit for prior schoolwork shall be approved by the Campus Director and shall be placed in the student's file for the record. If a student believes that, his/her prior knowledge or experience is sufficient to waive a class requirement, a comprehensive test will be administered to the student. A minimum grade of "B" is required in order to waive the class. This test is to be taken in advance, if possible, but not later than the first week of the class. Upon successful completion of the test, CTK may waive the class in favor of reducing time in school. At CTK, the maximum transfer or waiver has a limit of 200 clock hours in Pharmacy technician and Patient Care Technician program. However, there is no transfer of credit for Nurse Aide and Medication aid program as the contact hours are set by the state agency of the respective program.

In exceptional cases, CTK may consider granting credit from previous work experiences in the program related filed as per the decisions of admission committee.

Transfer Monitoring Process is designed to provide schools with the most current relevant data about the financial aid history of its transfer students – especially its mid-year transfers. The new regulations that became effective on July 1, 2001 (34 CFR 668.19) as published in the Federal Register on November 1, 2000, require the school to:

1. Inform NSLDS of its mid-year transfer students.
2. Wait at least 7 days after informing NSLDS before disbursing Title IV aid to those students so that NSLDS can perform its monitoring function.
3. Access any Alerts sent to the school by NSLDS as a result of the monitoring function.
4. Review the mid-year transfer students' revised financial aid history.
5. Make any necessary adjustments to scheduled disbursements.

6. Determine if the student is responsible for repaying any Title IV aid that was disbursed prior to the school's receipt of the revised history. Proceed to the listed procedures below.

If you have any questions about the new Transfer Monitoring Process call the NSLDS Customer Service Center at 1-800-999-8219, from 8:00 A.M. to 8:00 P.M. Eastern time. Or, you can email your question to [nsldscoe@raytheon.com](mailto:nsldscoe@raytheon.com).

## Procedure

1. Apply for Financial Aid
2. Call or visit CTK campus for verification that you have met the criteria for enrollment.
3. Set up your appointment with the Admission Office for an interview.
4. Following documents to be considered for acceptance
  1. Application for Admissions
  2. Birth Certificate (Copy)
  3. Social Security Card (Copy)
  4. Current Driver's License or State I.D.
  5. High School Diploma or GED
5. After all documents have been received and reviewed for completeness, you will be contacted of acceptance. You are now ready for enrollment. At this appointment, you will attend orientation, sign your enrollment agreement, and submit the following fees:

# Satisfactory Academic Progress SAP

## SATISFACTORY PROGRESS POLICY [SAP]

In our institute, Satisfactory Academic Progress (SAP) policy applies to all students enrolled in any authorized programs irrespective of the eligibility or ineligibility to the Title IV, HEA funds. Students should maintain SAP to continue eligibility for Title IV, HEA funding along with a good cumulative educational work during a length of the program. Students' good attendance and excellence in academic will be considered toward meeting requirements for the Title IV, HEA funds throughout the program. Moreover, any low performing students will receive necessary advice to improve their academics as well as attendance in a timely manner.

At CTK, satisfactory progress in attendance and academic work are the requirements to receive the Federal Title IV, HEA funds. To determine SAP, all students are evaluated in their academic performance and attendance through the Evaluation point. The progress of evaluation period for Title IV purposes will be performed at the mid-point of the program. In addition, if the student meets a minimum grade of C or 70% GPA, by the end of the last payment period, the student will be meeting the SAP. The minimum requirement of pace of attendance of 67% is expressed in calendar time by reviewing hours and weeks at SAP checkpoints. This is measured by dividing the student's successfully completed clock hours by scheduled clock hours and by dividing the number of weeks successfully completed hours. Students will be awarded a diploma certificate upon successful completion of the program.

The academic grading system is as follows:

A = 90-100; B= 80-89; C = 70-79; F= 69 or below

## ACADEMIC PROBATION

Any student failing to maintain at least a 70% average score in the program of study as kept in student's record by the instructor or the record office, is subject to probation. During the Academic probation (which is not the same as a Title IV, HEA Warning and/or Probation) the student's performance will be monitored and additional academic assistance will be given in an effort to assist the student in being removed from Academic Probation. The student must correct the deficiency that caused the

probation and must do so before the next evaluation period. Failure to improve during an Academic probationary period may subject the student to dismissal.

## **SAP Procedure**

### **6. Responsibilities:**

#### **1. Instructor**

1. Provide the student with instructional materials that challenge their knowledge on course objectives, theory, skill, and concepts
2. Provide the student with practical and application exams challenge their knowledge on course objectives, theory, skill, and concepts
3. Document grades in individual paper grade book and/or electronic grade within 48 hours of completing the examination or skill assessment.
4. Review progress monthly reports with students.
5. Have student's sign and instructor sign progress report- return to student files.
6. Alert Campus Director of students who fall below the 70%
7. Print student monthly progress reports with student's current GPA and attempted total hours as of the date of the generated progress report.
8. Place progress reports in instructor's mailbox
9. Place signed copies in the student's academic folders.
10. Make copies of CTK Healthcare and Carrier Institute progress reports for Financial Aid (FA) files- Place them in the Financial Aid Mailbox

#### **2. Financial Aid Administrator**

1. Place progress reports in Financial Aid folders and alert finance office if student successfully meets requirements and is entering new pay period

#### **3. Campus Director**

1. Review the academic status of all students who fall below the 70%
2. Meet with each student who fall below the 70% recommending Probationary status
3. Alert Financial Aid of the student's status

# Financial Aid Warning

## Financial Aid Warning Policy

### Title IV, HEA Financial Aid Warning

Financial Aid Students must attend a minimum of 67% of the cumulative scheduled hours to maintain SAP and complete the course within the maximum allowed period. The attendance percentage is determined by dividing the total hours by the total number of hours scheduled. Students are expected to attend classes as per their enrollment agreement. Students are responsible to clock in and out appropriately to document their hours. Instructors take class attendance and a student must make sure his/her attendance is recorded correctly.

To remain in good academic standing, a student must maintain a least a 70% average (67% cumulative attendance and a grade C or 70%) and complete the course in the designated time frame. Students who fall below a 70% average may be placed on Academic Probation as well as Title IV, HEA financial aid warning and /or probations if granted. Any students on financial aid warning continue to receive the grant under Title IV, HEA programs for only one payment period.

## Financial Aid Warning Procedure

### 1. Responsibilities:

#### 1. Campus Director

1. Alert the Financial Aid Administrator about the students who is falling below SAP in academic work and attendance issue the warning at the end of the payment period.
2. Discuss the guidelines of the Financial Aid Warning status with the students
3. Instruct Financial Aid officer for disseminating a copy of guidelines of Financial Aid Warning to the students, keep a copy of Warning on Financial Aid file and send a copy to the Department of Education.
4. Monitor progress during the duration of the Financial Aid Warning as indicated.

**2. Instructor**

1. Monitor progress during the Financial Aid Warning

## **Financial Aid Probation Policy**

### **Title IV, HEA Financial Aid Probation**

A student who does not meet SAP requirement at the end of the financial aid warning shall be placed under the Financial Aid Probation. However, s/he may be eligible for receiving Title IV, HEA and during the appeal period but for only one payment period. While under probation, a student must meet the SAP standards and requirements of the Institutional Academic Improvement Plan designed to reinstate the eligibility of Title IV, HEA. Those who fail to meet the SAP requirements will not be eligible for to receive Title IV, HEA funds for the subsequent payment periods but s/he may continue on a cash pay basis with an approved payment plan.

#### ***Procedure***

**2. Responsibilities:**

**1. School Director**

1. Alert FA administrator
2. Monitor progress during the duration of the Financial Aid Warning as indicated.
3. Evaluate the student's progress at the end of the Financial Aid warning period
4. Offer students for appealing in case of failure for reinstate the FA
5. Proceed with appeals process and alert the appeals committee about the written appeal
6. Alert Financial Aid Administrator and instructors about the Financial Aid of student status
7. Alert appeals committee of student's written appeal



# Appeals

## Policy and Procedure

### *Appeal Process*

A student who loses eligibility to receive the financial aid due to failure to maintain SAP at the end of the financial warning has the right to appeal to have her/his aid reinstated. The appeal form can be obtained upon request to CTK Healthcare and Career Institute. The student is required to submit a written appeal to School Director regarding the loss of any types of financial aid within 10 business days. The appeal will be reviewed by the director and a decision made within 10 business days. Student will be notified of the decision in writing by the school administrator.

For special consideration to reinstate the eligibility, the student must provide the convincing reason related to the events below:

1. death of a relative,
2. an injury, or illness of the student
3. or other special unavoidable circumstance

## Academic Improvement Plan Requirements

With an outstanding or maintaining required attendance will ensure a student meet SAP by the next payment period

1. Set your goal for the improvement
2. Maintain a 70 % GPA or higher to overcome the previously lacking areas
3. Attend theory and practical classes 4 times out of 5 in a week.
4. Complete homework, assignments, and all tests assigned by the instructor
5. School Director or instructor will monitor the academic improvement plan each month
6. In case of denial of the grant, a student must be responsible for the incurred expenses including tuition and fees.

## *Reestablishment of Status*

A student may reestablish a regular SAP status from NOT to be making SAP when meets the conditions below:

1. By the end of probation period, students should maintain 67 % or above attendance
2. By completing missing homework, assignments, and tests and increasing GPA to 70% or above.

## *Reinstatement of Financial Aid*

Title IV, HEA aid will be reinstated if a student who have appealed and meets all the requirements including maintaining SAP or who have reestablished SAP. To determine whether a student reestablished SAP, s/he will be monitored daily basis.

## **Appeal Procedure**

### **3. Responsibilities:**

#### **1. School Director**

1. Alert Financial Aid Administrator and instructor and appeal committee regarding the written financial aid appeal of the student
2. Proceed with appeals process
3. Monitor and evaluate the progress of the student during the Financial Aid (FA) Warning period
4. Offers the student options to appeal in case of failure to reinstate.

# Return to Title IV, HEA Funds (R2T4)

## Return to Title IV Policy

### Return to Title IV Funds Policy Title IV Eligible Program

As per the United States Department of Education Financial aid administration, financial aid is for educational purposes only. Therefore, at CTK, when a student withdraws before completing his/her program, a portion of the funds received by a student may have to be returned. The financial aid office will calculate the amount of tuition to be returned to the Title IV, HEA Federal fund programs according to the following policies.

In our institution, the title IV, HEA policy applies to a student who withdraws officially from the program, unofficially or fail to return a leave of absence or dismissed from enrollment. The tuition returns policy is separate and distinct from the refund policy published in school catalog.

The Title IV, HEA funds are awarded to the student under the assumption that he/she will attend school for the entire period for which the aid is awarded. When student withdraws, he/she may no longer be eligible for the full amount of Title IV, HEA funds that were originally scheduled to be received. The amount of Title IV, HEA aid earned is based on the amount of time a student spent in academic attendance. Therefore, the amount of Federal funds earned must be determined. If the amount disbursed is greater than the amount earned, unearned funds must be returned. The order of return of unearned funds do not include funds from sources other than the Title IV, HEA programs.

As per the rule, CTK has **45 days (forty-five)** from the date that its financial aid office determines that the student has withdrawn to return all unearned funds for which it is required to notify through a written notice to the student if s/he owes a repayment. In the written notice, CTK will advise the student or parent that s/he has **30 (thirty) calendar** days from the date that the school sent the notification to accept a post withdraw disbursement. In case a response is not received by our institute from the student or parent within the allowed time frame or the student declines the funds, the school will return any earned funds that the school is holding to the Title IV, HEA programs.

## ***Return to Title IV Procedure***

The following responsibilities are assigned to various officers of the Campus as below:

### **Financial Aid Director**

1. Process the withdrawal according to the guidelines.
2. Have students sign withdrawal forms if available or mail them if student is not available to sign.
3. Print an updated sign in sheet for Financial Aid and Department of Education file.
4. Alert instructors of the student's withdrawal and final grades.

### **Finance Office**

1. School alerts third party of withdrawal and/or termination. FAME (third party) calculate the R2T4 and compares with school calculation
2. Submits notification to the third-party servicer of request to return monies owed based on the R2T4 calculations in writing.
3. Submits return within **45 days** of the withdrawal
4. Submits notification to the student the amount of return based on R2T4 calculations in writing.
5. Ensures monies returned is in the proper account for retrieval
6. Prints an updated Student Ledger Sheet for the Educational Department and Financial Aid files.

### **Financial Aid Officer**

7. Places the updated copies in the Financial Aid folder (student ledger, sign in sheet, withdrawal letters, notices, etc.)
8. Issue a grant overpayment notice to student within **30 days** from the date the school's determine that the student withdrew
9. Transfers files from active to non-active

## **“Official” Withdrawal from the School**

At CTK, a student is considered “Officially” withdrawn on the date the student notifies the FA Director or Campus Director in writing of his/her intent to withdraw. The date of the termination and refund purposes will be determined as below-

1. Date student provided official notification of intent to withdraw, in writing to the FA director or Campus Director.
2. The date the student began the withdrawal from the records. A student is allowed to cancel his/her notification in writing to FA or Campus Director and continue the program. However, if the student subsequently drops, the student’s withdrawal date is the original date of notification of intent to withdraw.

### ***Official Withdrawal Procedure***

At CTK the withdrawal policy is implemented through various officers. For this purpose, the institution has assigned the following responsibilities among the various officers on the Campus.

#### **School Director**

1. Completes the school drop form
2. Completes the Financial Aid Return to Title IV worksheet
3. Completes CTK’s withdrawal form
4. Alerts FA Director and Finance Director

#### **Instructor**

5. Updates the student’s final grades At CTK’s grade system
6. Completes student exit form

#### **Finances Director**

7. Alerts the third-party server (FAME) of withdrawal and/or termination
8. Third Party (FAME) will calculate R2T4 and compare with school’s calculations.

9. Submits notification to the Third-party servicer of request to return monies owed based on R2T4 calculations in writing.
10. Submits return within **45 (forty-five) days** of the withdrawal
  11. Submits notification to the student the amount of return monies based on R2T4 calculations in writing.
12. Ensures monies returned is in the proper account for retrieval
13. Prints updated Student Ledger Sheet of the R2T4 for Ed and FA files.
14. Supplies the student with a final Student Ledger Sheet
  15. Returns the amount for any unearned portion of the Title IV funds for which the school is responsible, within 45 days of the date the official notice was provided.
  16. Provides the student with a letter explaining the Title IV, HEA requirements: The amount of Title IV assistance the student has earned based upon the length of time the student was enrolled in the program, based on scheduled attendance and the amount of funds the student received.
  17. Ensures the returns that will be made to the Title IV, HEA Federal program on the student's behalf as a result of exiting the program based on student's scheduled attendance is more than 60% of the payment period, he/she is considered to have earned 100% of the Federal funds received for the payment period. In this case, no funds need to be returned to the Federal funds.
  18. Advises the student of the amount of unearned Federal funds and tuition and fees that the student must return, if applicable.

### **Financial Aid Director**

The Financial Aid Director is responsible for the following roles:

19. Alert Campus Director and Finance Director
  20. Have students sign withdrawal forms if available or mail them if student is not available to sign
21. Print an updated sign in sheet for Financial Aid and Education Department file.
22. Inform instructors of the withdrawal and for final grades.
23. Process the withdrawal according to guidelines for Institution and Title IV.
24. Conduct Financial Aid Exit Interview

25. Place updated copies in the Financial Aid folder (student ledger, sign in sheet, withdrawal letters, notices, etc.)
26. Provide a letter or document of the process for the Return to Title IV process.
27. Transfer file from active the non-active
28. File the folder to the non-active file.

### **Admission Officer**

Upon receipt of the official withdrawal information, admission officer will complete the following:

1. Determine the student's last date of attendance as of the last recorded date of academic attendance on the school's attendance record  
Calculate the followings:
  - a) Student's ledger card and attendance record are reviewed to determine the calculation of Return of Title IV, HEA funds the student has earned, and if any, the amount of the Title IV funds for which the school is responsible. Returns made to the Federal Funds Account (FFC) are calculated using the school's Return of Title IV, HEA Funds Worksheets, scheduled attendance and are based upon the payment period.
  - b) Calculate the school's refund as per the school refund calculation)
  - c) Update the student's grade to reflect his/her final grade.
2. Supplies the student with ledger card record noting outstanding balance due to the school and the available methods of payment. Put the copy of the completed worksheet, check, letter and final ledger card in the student's file.

## **Unofficial Withdrawal Policy**

At CTK, the Campus Director or Finance Director must complete the withdrawal form if any student that does not provide official notification of his or her intent to withdraw and is absent for more than **14 (fourteen) consecutive calendar days**, as this student will be subject to termination and considered to have unofficially withdrawn.

Within **one week** of the student's last date of academic attendance, the following procedures will take place:

1. The Financial Aid Officer and/or Campus Director will make three attempts to notify the student regarding his/her enrollment status
2. Determine and record the student's last date of attendance as the last recorded date of academic attendance on the attendance record
3. The student's withdrawal date is determined as the date the day after 14 consecutive calendar days of absence
4. Notify the student in writing of their failure to contact the school and attendance status resulting in the current termination of enrollment
5. Financial aid office calculates the amount of Federal funds the student has earned, and, if any, the amount of Federal funds for which the school is responsible.
6. Calculate the refund as per the school refund calculation.
7. Finance Director will return to the Federal fund programs any unearned portion of Title IV funds for which the school is responsible within **45 (forty-five) days** of the date the withdrawal determination was made, and note return on the student's ledger card.
  
8. If applicable, the Financial Aid office will provide the student with a refund letter explaining Title IV requirements:
  1. The amount of Title IV aid the student has earned based upon the length of time the student was enrolled and scheduled to attend in the program and the amount of aid the student received.
  2. Advise the student in writing of the amount of unearned Title IV aid and tuition and fees that he/she must return, if applicable.
  3. Supply the student with a final student ledger card showing outstanding balance due the school and the available methods of payment.
  
1. A copy of the completed worksheet, check, letter, and final ledger card will be kept in the student's file.

At CTK, either the case of official or unofficial withdraw by student, the earned Aid and disbursement is determined as per the policy of United States Department of Education and implemented as below-



## Earned AID

As per the United States Department of Education, the Title IV, HEA aid is earned in a prorated manner on a per diem basis of calendar days or clock hours, up to the 60% point in the payment period, and the Title IV, HEA aid is viewed as a 100% earned after that point in time. At CTK, a copy of the worksheet used for this calculation is kept in file by financial aid officer and can be verified by the financial aid director.

## Withdraw Before 60% and After 60%

As per the United States Department of Education, CTK must perform a R2T4 to determine the amount of earned aid through the 60% point in each payment period or period of enrollment. The financial aid office will use the Department of Education prorate schedule to determine the amount of the R2T4 funds a student has earned at the time of withdraw. However, after the 60% point in the payment period or period of enrollment, the student has earned 100% of the Title IV, HEA funds s/he was scheduled to receive during this period. At CTK, its finance office must still perform a R2T4 to determine the amount of aid that the student has earned.

The financial aid office measures progress in Clock Hours and uses the payment period for the calculation.

### The Calculation Formula

To determine the amount of the Title IV, HEA Aid that was disbursed plus Title IV, HEA aid that could have been disbursed, CTK calculates the percentage of the Title IV, HEA aid earned:

1. Divide the number of clock hours scheduled to be completed in the payment period as of the last date of attendance in the payment period by the total clock hours in the payment period

### Hours Scheduled to Complete / Total Hours in Period = % Earned

2. If this percentage is greater than 60%, the student earns 100%.
3. If this percent is less than or equal to 60%, proceeds with calculation.

To calculate the amount of aid a student earned, the financial aid office of CTK follows this formula from the United States Department of Education-

1. Amount of aid Student has earned
  2. Percentage earned from (multiplied by) Total aid disbursed, or could have been disbursed
  3. Amount to Be Returned = Subtract the Title IV aid earned from the total disbursed.
4. Unearned Percent = 100% minus percent earned
  5. Unearned percent (multiplied by) total institutional charges for the period = Amount Due from the School.
  6. If the percent of Title IV aid disbursed is greater than the percent unearned (multiplied by) institutional charges for the period, the amount disbursed will be used in place of the percent unearned.
  7. If the percent unearned (multiplied by) institutional charges for the period are less than the amount due from the school, the student must return or repay one-half of the remaining unearned Federal Pell Grant.
  8. Student is not required to return the **overpayment** if this amount is equal to or less than 50% of the total grant assistance that was disbursed /or could have been disbursed. The student is also not required to return an overpayment if the amount is \$50 or less.
  9. The financial aid office of CTK will issue a grant overpayment notice to student within **30 days** from the date the school's determine that the student withdrew, and gives student **45 days** to either:
    10. Repay the overpayment in full to CTK or Sign a repayment agreement with the U.S. Department of Education.

## Order of Return

The Finance Office of CTK is authorized to return any excess funds after applying them to current outstanding Cost of Attendance (COA) charges. A copy of the Institutional R2T4 work sheet performed is available through the office upon student request. At CTK, In accordance with Federal regulations, when the Title IV, HEA financial aid is involved, the calculated amount of the R2T4 Funds" is allocated in the following order:

11. Unsubsidized Direct Stafford loans (other than PLUS loans)
12. Subsidized Direct Stafford loans

13. Parent Plus loans – received on behalf of the student
14. Direct PLUS loans - received on behalf of the student
15. Federal Pell Grants for which a Return is required
16. Iraq and Afghanistan Service Grant for which a Return is required
17. Federal Supplemental Educational Opportunity Grant
18. Other Title IV, HEA assistance

### ***Post-Withdrawal Disbursement policy***

If a student did not receive all of the funds that s/he earned, student may be due a post-withdrawal disbursement. As per the United States Department of Education, If the post-withdrawal disbursement includes loan funds, CTK must get student’s permission before it can disburse them. However, student may choose to decline some or all of the loan funds so that s/he does not incur additional debt. CTK may automatically use all or a portion of the students’ post-withdrawal disbursement of grant funds for tuition, fees, and room and board charges (as contracted with the school).

CTK needs student’s permission to use the post-withdrawal grant disbursement for all other school charges. If the student does not give permission (CTK may ask for this when student enrolled), then the student will be offered the funds. However, it may be in the best interest of the student to allow the school to keep funds to reduce the debt at the school. The financial aid office attempts to disburse the credit balance by check. If the check is not cashed, it must return the funds no later than 240 days after the date the school issued the check.

If a check is returned to CTK, or an EFT is rejected, the financial aid office may make additional attempts to disburse the funds, if those attempts are made not later than 45 days after the funds were returned or rejected. When a check is returned or EFT is rejected and the school does not attempt to disburse the funds, the funds must be returned before the end of the initial **45-day** period. CTK must cease all attempts to disburse the funds and return them no later than 240 days after the date it issued the first check.

### **Post Withdrawal Disbursement Procedures**

At CTK, the following specific officers are assigned responsibilities to implement the disbursement.

## 1. Financial Aid Officer:

1. Students will sign a document during the enrollment process stating whether they would like post-withdrawal disbursements monies to be used to satisfy fees that may have occurred during their enrollment.
2. Place the signed form in their Financial Aid folder for the record

## 2. Finance Officer

1. Will be responsible for any post-withdrawal disbursement within 180 days from the date of determination of withdrawal.
2. Will return an unclaimed Title IV, HEA credit balance no later than 240 days after the date it issued the first check.

### **Institutional Responsibilities related to the return of Title IV, HEA funds**

Responsibilities of CTK regarding the Title IV, HEA funds are as follows:

Provide students information with information in this policy

Identify students who are affected by this policy and completing the return of Title IV, HEA funds calculation for those student

### ***Return any Title IV, HEA funds due to the correct Title IV, HEA programs***

CTK is not always required to return all of the **excess funds**; there are situations once the R2T4 calculations have been completed in which the student must return the unearned aid.

### ***Over payment of Title IV, HEA Fund***

Any amount of unearned grant funds that a student must return is called overpayment. The amount of grant overpayment that a student must repay is the prorated amount of grant funds received or were scheduled to receive. A student must make arrangement with the office of financial aid of CTK or Department of Education to return the amount of unearned grant funds

## **Student's Responsibilities related to the return of Title IV, HEA Fund**

Returning to the Title IV, HEA programs any funds that were dispersed to the student in which the student was determined to be ineligible for via the R2T4 calculation.

At CTK, any notification of withdraw by the student should be in writing and addressed to the campus director or Financial Aid director. However, a student may cancel his or her notification of intent to withdraw by submitting a letter of intent to withdraw the cancellation notice in writing to the campus director.

The requirements for the Title IV, HEA program funds when a student withdraw are separate from any refund policy that CTK may have to return to the student is due to a cash credit balance. Therefore, a student may still owe funds to the school to cover unpaid institutional charges. CTK may also charge the student for any Title IV, HEA program funds that s/he is required to return on his/her behalf. It is the responsibility of the student to ensure the refund policy, by contacting to the admission officer of CTK.

# **Refund- Institutional**

## **Institutional Refund Policy**

### **Institutional Refund Policy (For both Withdrawn and Dismissed Students)**

#### **Non-Title IV Eligible Programs**

##### **Three – Business Day Cancelation**

At CTK, if a student does not start the class disregard of any reason, all monies paid excluding application and registration fees will be refunded if requested within three business days upon signing an enrollment agreement and making an initial payment.

Applicants who cancel the enrollment or students who withdraw from the enrollment, CTK will apply a fair and equitable settlement practice. The following policy will apply to all the students who are terminated for any reason, either a decision by students or a program cancellation, or school closure. Any monies due shall be refunded within 45 days of the official cancellation or withdrawal in effect with prior

to that date. The following criteria will be practiced in terms of the monies refund.

1. If an applicant is not accepted by the school, the applicant shall be entitled to a refund of all monies paid to CTK
2. If a student (or legal guardian) cancels his/her enrollment in writing within three business days of signing the enrollment agreement. In this case all monies collected by the school shall be refunded, regardless of whether the student has started classes
3. If a student cancels his/her enrollment after three business days of signing the contract but prior to starting classes. In these cases, he/she shall be entitled to a refund of all monies paid to the school less the registration fee of \$20 and application fee of \$100
4. A student notifies the institution of his/her withdrawal in writing
5. A student on an approved leave of absence notifies the school that he/she will not be returning. The date of withdrawal shall be the earlier of the date of expiration of the leave of absence or the date the student notifies the institution that the student will not be returning
6. A student is expelled by the school (Unofficial withdrawals will be determined by the institution by monitoring attendance at least every 2 weeks.)
7. In type 2, 3, 4 or 5, official cancellations or withdrawals, the postmark on the written notification will determine the cancellation date, or the date said notification is delivered to the admission officer.

At CTK, If a student who enrolls and begins classes but withdraws prior to the course completion (after three business days of signing the contract), the following schedule of tuition earned by the school applies. All refunds that are based on scheduled hours are as follows:

<b>Percentage of Scheduled Time Enrolled</b>	<b>Total Tuition School Shall Receive/Retain</b>
0.01% to 4.9%	20%
5% to 09.9%	30%
10% to 14.9%	40%
15% to 24.9%	45%
25% to 51.9%	70%
52% and over	100%

8. All refunds will be calculated based on the students last date of attendance. Any monies due a student who withdraws shall be refunded within 45 days of a determination that a student has

withdrawn, whether officially or unofficially. In the case of disability, illness or injury or death of the student, immediate family or other documented mitigating circumstances, a reasonable and fair refund settlement will be made. If permanently closed or no longer offering instruction after a student has enrolled, the school will provide a pro rata refund of tuition to the student OR provide a course completion through a pre-arranged teach out agreement with another institution.

9. If a course is cancelled after a student's enrollment, the school will either provide a full refund of all monies paid or completion of the course can be re/arranged at a later time. If the course is cancelled after students have enrolled and instruction has begun, the school shall provide a pro rata refund for all students transferring to another school based on the hours accepted by the receiving school OR provide completion of the course OR participate in a Teach-Out Agreement OR provide a full refund of all monies paid

## **Refund Policy for students called onto the active military services**

A student of the school or college who withdraws from the school or college as a result of the student being called on active duty in military service of the United States or the Texas National Guard may elect one of the following options for each program in which the student is enrolled:

10. if tuition and fees are collected in advance of the withdrawal, a pro rata refund of any tuition, fees, or other charges paid by the student for the program and a cancellation of any unpaid tuition, fees, or other charges owed by the student for the portion of the program the student does not complete following withdrawal;
11. a grade of incomplete with the designation "withdrawn-military" for the courses in the program, other than courses for which the student has previously received a grade on the student's transcript, and the right to re-enroll in the program, or a substantially equivalent program if that program is no longer available, not later than the first anniversary of the date the student is discharged from active military duty without payment of additional tuition, fees, or other charges for the program other than any previously unpaid balance of the original tuition, fees, and charges for books for the program; or
12. the assignment of an appropriate final grade or credit for the courses in the program, but

only if the instructor or instructors of the program determine that the student has:

1. Satisfactorily completed at least 90 percent of the required coursework for the program; and
  2. Demonstrated enough mastery of the program material to receive credit for completing the program.
13. Students who withdraw or terminate prior to course completion are charged a cancellation or administrative fee of \$100.00. This refund policy applies to tuition and fees charged in the enrollment agreement. Other miscellaneous charges the student may have incurred at the institution (EG: extra kit materials, books, products, unreturned school property, etc.) will be calculated separately at the time of withdrawal. All fees are identified in the catalog and in this enrollment agreement.
14. Students who withdraw or terminate prior to course completion will also be required to pay the institution the amount of unmet charges the institution has to Return to Title IV and will be calculated separately at the time of withdrawal.

### **Institutional Refund Procedure**

At CTK, the following designees are assigned responsibilities to ensure that the students are awarded refunds based on the policy of institutions.

#### ***Admission Officer***

1. Informs the finance office that the perspective student chooses not to enroll/continue the program within the timeframe of scheduled hours.
2. Calculate the refund based on the policy of scheduled hours
3. Keeps the refund document received from fiance office on students file

#### ***Finance Office***

1. Will refund the amount paid within to the perspective student
2. Notify the student in writing the amount of the refund
3. Documents refund on the student ledger
4. Refunds amount to student
5. Monies owed to the school is calculated on a withdrawal form based on actual hours



spent in the classroom as explained on the policy of scheduled hour

6. Provide the refund document to the admission office

## STATE GRIEVANCE PROCEDURES

### Grievances/Complaint Resolution Policy

In order for excellence to fulfill its mission to serve the education needs of the students as per the mission statement, CTK establish and implement its well-established Grievances policy, to resolve the student's Grievances matters. The policy ensures to resolve issues between students and college quickly and in a fair and reasonable manner. An aggrieved student may complain the administration against the grievance decision.

**Responsible person:** The responsibility to resolve this issue finally goes on the shoulder of its Director.

#### The outline of activities

1. If you are or were recently a student of CTK Healthcare and Career Institute (licensed by the Texas Workforce Commission) and are having a problem with the school, you should first attempt to get the school to address your concerns, following the "Grievance" or "Complaints" policy explained below. If your problem is not resolved, you may file a complaint with Career Schools and Colleges.
2. Any student complaint must be discussed or directed to the Instructor following the appropriate chain of commands. This complaint must be in writing. If the student and the Instructor or Program Director cannot come to an agreement, the complaint must be presented to the School Administrator to resolve. Student may choose to email the school Administrator directly at [ctkhealthcare@gmail.com](mailto:ctkhealthcare@gmail.com) or call 940-594-8910 with compliant. Students are advised to direct an unresolved grievance to: (This policy is reviewed annually by advisory board and/or by staff meeting annually, and revised as needed)

**Dr Prem Adhikari**

**Director, CTK healthcare & Career Institute**

**3455 N Beltline Rd Ste # 203, Irving, TX**

**[ctkhealthcare@gmail.com](mailto:ctkhealthcare@gmail.com)**

**Ph # 940-594-8910**

**Texas Workforce Commission**

**Career Schools and Colleges**

**101 East 15<sup>th</sup> Street**

**Austin, Texas 78778-0001**

**OR**

**Council on Occupational Education**

**7840 Roswell Road**

**Building 300, Suite 325**

**Atlanta, GA, 30350**

# Facilities & Services Available to Students with Disabilities

## Facilities & Services for Students with Disabilities

CTK is committed to maintaining a fair and respectful environment for study. In accordance with federal and state law, the school prohibits harassment of or discrimination against any person because of, disability by any of its member on campus. Incidents of harassment and discrimination will be met with appropriate disciplinary action, up to and including dismissal or expulsion from the program. CTK accommodates qualified students with disabilities as recognized by applicable law if the student is otherwise meet the basic enrollment requirements. For purposes of reasonable accommodation, a student or applicant with a disability is a person who has learning, physical or psychological impairment which limits one or more major life activities (such as walking, seeing, speaking, learning, or working).

### *Facilities & Services for Students with Disabilities Procedure*

#### **1. Responsibilities:**

1. Admission Administrator
  1. Notifies the student of the option to share their disability on their medical history form
  2. Encourages the student to provide the necessary documentation outlining his or her disability.
2. School Director
  1. Evaluates if CTK can accommodate and can give reasonable accommodations.
  2. If reasonable accommodations can be met, CTK will complete an accommodations page, submit a copy to the instructor, one to the student, and the other in the student's file
  3. If reasonable accommodations cannot be met by CTK, the student will be referred to a partnered agency (Texas Vocational Rehab. Services) for

assistance in providing such accommodations either with CTK or with a different institution.

## Net Price Calculator

### Net Price Calculator Policy

CTK Healthcare and Career Institute is committed to comply with the requirements of Higher Education Opportunity Act (HEOA) of 2008 regarding posting of net price calculator at its website. HEOA states that “The calculator shall be developed in a manner that enables prospective students, families and consumers to determine an estimate of a prospective student’s individual net price at a particular institution.” All schools participating on Title IV program should announce the net price calculator institute website. Estimated net price information based on various institutional data is available for current and prospective students. However, calculator generated estimated price does not represent final price, or financial aid award. It is just an estimation based on cost of attendance and available financial aid to the students of any given year.

The calculator is based on the elements below.

1. Age
2. Marital Status
3. Family Size
4. Number of family members in college
5. Parents income for dependents (or household income for independents)
6. Living status (on campus, off campus, or with parents)
7. Residency Status (in-state or out of state)

Various institutional data can be used for the accurate estimation of net price. However, following set of data are the minimum requirement an institute should use to estimate their net price.

1. Estimated total price of attendance

2. Estimated tuition and fees
3. Estimated room and board
4. Estimated books and supplies
5. Estimated other expenses (including personal expenses and transportation)
6. Total estimated merit- and need-based grant aid
7. Estimated net price (price of attendance minus grant aid)

#### Method

CTK uses following information for net price estimation

1. Price of attendance
2. Establish student's dependency status, COA, and approximate EFC
3. First-time, median amount of grants and scholarship aid based on EFC by full-time students

Students apply via FAFSA application portal using those aforementioned databases. The inbuilt template at the U.S. Department of Education FAFSA portal estimates median grant and scholarships based on EFC amount to identify total amount of grant aid. The method to estimate total price of attendance described in FAFSA website is below:

The template uses a look-up table populated with data from the FAFSA applications database to identify a median EFC –Median EFC is matched with the median grant and scholarship aid amount entered by the institution for the corresponding EFC range to determine the student's estimated amount of total grant aid –Estimated net price is calculated by subtracting estimated total grant aid from the estimated total price of attendance Net Price Calculator Template.

## Net Price Calculator Procedures

1. Responsibilities
  1. Financial Administrator
    1. Prepare Net Price Calculator
    2. Consult with liaison officer or Director for the input data in Net Price Calculator
    3. Describe the method estimation method to incoming students
    4. Up date the Net Price Calculator annually

2. School Director
  1. Make sure the Net Price Calculator is updated

## Copyright Infringement and Sanctions

### Copyright Infringement & Sanctions Policy

CTK takes copyrighting infringement as a serious crime. This includes violation of of the exclusive rights of the owners including but not limited to the distribution of Copyrighted materials or unauthorized peer-to-peer file sharing without permission. These actions may subject to the violators to civil and criminal penalties.

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. A court can, in its discretion, also assess costs and attorneys’ fees. For details, see Title17, United States Code, Sections 504, 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 website of the U.S. Copyright Office at ([www.copyright.gov](http://www.copyright.gov)).

Unless and until the copyright is considered a “fair use”, copyright protected work can be copied or used by the permission of the copyright holders. The Copyright Act does not clearly set the scope for ‘fair use’. However, there should be a determination of following the available guidelines and standards before making copies of any copyright materials without permission of the copyright holder.

## Copyright Infringement Procedure

### 1. Responsibilities:

#### 1. Instructors and Administrative Staff

1. Instructors must use the textbooks and workbooks provided to each student
2. Instructors should not allow students copying materials from textbooks, workbooks, and other published materials during teaching, homework or other assignments.
3. In case of copying the copyrighted materials, one should contact the owner and request for the permission to duplicate. The contact address can be found in the published materials or can be contacted to the publisher for the way to get into with owners.
4. The duplicated materials should cite the title, author and/or editor of the published materials including the exact material to be used, page numbers, chapters and, if possible, a photocopy of the material and number of copies to be produced.
5. The duplicated or reprinted materials should be mentioned as if they are going to use for business or educational purposes.
6. Instructors or administrators should seek permission from the Director prior to making copies.
7. In order to monitor this policy and procedures, all printing and copying are limited to under 500 copies for each instructors per month.  
Additionally, all copies are reviewed by the administrative staff member as copies are obtained from the copy machine located in the FA office.

# School Program Accreditation & Approval

## School Program Accreditation Policy

### Accreditations

The national accreditation to CTK Healthcare and Career Institute was awarded by Council on Occupational Education (COE) in September 2020. CTK is committed to compliance with the rules, regulations and standards of COE.

### Licensure

CTK Healthcare and Career Institute is licensed by the Texas Workforce Commission (TWC) Career Schools and Commissions and it is committed to adhere to the rules and regulations of the Commission.

## School Program Accreditation Procedure

### 1. Responsibilities:

1. School Director
  1. Revise and review the plans, procedures and Self-Study annually and update whenever and wherever required.
  2. Planning of process, procedure related to all in-services required by state and accreditation agencies
  3. Prepare and submit all documents related to new employees and programs, and renew licensure approvals when necessary and prior to any deadline.
  4. Oversee and submit all documents required for Reporting information prior to the deadline mentioned below:
    1. CPL data- September of each year for COE
    2. Graduation data- September of each year for COE
    3. Auditing data-
      1. September of each year for COE
      2. April of each year of DOE



## School Accreditation Procedure

2. School Director
  1. Revise and review the plans, procedures and Self-Study annually and update whenever and wherever required.
  2. Planning of process, procedure related to all in-services required by state and accreditation agencies
  3. Prepare and submit all documents related to new employees and programs, and renew licensure approvals when necessary and prior to any deadline.
  4. Oversee and submit all documents required for Reporting information prior to the deadline mentioned below
    1. Annual Report data- November of each year for COE
    2. Graduation data- November of each year for COE
    3. Placement data- November of each year for COE
  
2. Instructors and Staff Members
  1. All Instructors are expected to serve in various committees and help the Director to accomplish required documents.

## School State Approval Procedure

1. School Director
  1. Revise and review the plans, procedures and Self-Study annually and update whenever and wherever required.
  2. Planning of process, procedure related to all in-services required by state and accreditation agencies
  3. Prepare and submit all documents related to new employees and programs, and renew licensure approvals when necessary and prior to any deadline.
  4. Oversee and submit all documents required for Reporting information prior to the deadline mentioned below

1. Graduation data- November of each year for TWC
2. Auditing data- June of each year for eZ audit
5. The director is responsible for meeting all the processes for annual recertification with TWC each year.

## Voter Registration

### Voter Registration Policy

Higher Education Act requires all post-secondary schools to make a good-faith effort to distribute the voter registration form. The institute must make the voter registration form widely available and provide to each student. The institute should provide it to those individuals who are seeking a degree or certificate and eligible for Federal Student Aid. Schools can mail the paper copy of voter registration form or send it electronically or provide the internet link of the voter registration to each eligible student.

Some states require exclusive electronic messages for voter registration. In such cases, schools must request voter registration form 120 days prior to the voter registration deadline. This provision applies to the both general and special elections for both federal and state offices including governors and other chief executives. However, school is not liable for meeting this requirement incase it does not receive the voter registration forms 60 days prior to any election deadline.

### Voter Registration Procedure

#### 1. Responsibilities:

- 1.
2. Admission Administrator
  1. Request voter registration forms in a timely manner and include it with each enrollment package.
  2. Inform students about website for voter registration during the orientation
  3. Have students sign the acknowledgment page about receiving the form and information of voter registration form.

4. Have students sign the acknowledgment page about receiving the form and information of voter registration form.

## IPEDS Report

### IPEDS Policy

Each school must make available of information on completion, graduation rates and, if applicable transfer-out rates by the July 1 following 12-month period ending August 31. The estimation of completion and transfer-out rate by CTK is based on the expiration of 150% of normal time taken by the group of students during the enrollment period. School should be responsible for the dissemination of this report to enrolled and prospective students via email or hardcopy upon request. Other interested entities can get the copy of this report upon request.

### IPEDS Procedure

#### 1. Responsibilities:

##### 1. School Director/Financial Aid Administrator

1. Responsible for gathering and entering the data into the systems during the reporting periods
2. Maintain a binder in the Director's office with the necessary documents supporting the IPEDS reporting data until such data is available electronically.
3. Will ensure the reporting data is uploaded to the CTK Healthcare and Carrier Institute website for review along with the following links.
  1. College Navigator
  2. Net Price Calculator

# Disbursement For Books & Supplies

## Disbursement for Books & Supplies Policy

### *Special provisions for books and supplies: 34 CFR 668.164(m)*

Each student should be able to purchase books and supplies after the enrollment for the academic success. School must provide a way to obtain a books and supplies for students who are eligible for FSA (PELL) funds required for the payment period if

1. School could have disbursed FSA funds to the students 10 days prior to beginning of the payment period
2. FSA credit balance would have been created due to disbursement of funds

The includes the cost of books in total tuition and fees and must provide all the books and supplies students need to complete the program. The institution must consider the all FSA source funds that a student is eligible for but not the funds from non FSA source. While estimating student's cost of attendance, school can determine the required amount of books and supplies or the allowance for those materials. However, students have right to "opt out" to participate in the process of purchasing books and supplies. If students obtain the books and supplies with the process set by school, they are authorized to use FSA funds with the school has no obligation to get the written authorization for this purpose. The same procedure applies to the Pell-eligible students. However, a student need to meet all verification requirements to be eligible for any kind of FSA grants before the beginning of payment period. ISIR or SAR of a student with code "C" indicates the unresolved or conflicting the verification process. Students are not be able to get the books and supplies when such issues do not resolved in 10 days prior to students payment start period.

### 30-day Delay Requirement

School does not need to comply with a provision of 34 Clarification when there is 30-day delay disbursement of Direct Loan and this loan is the only Title IV aid the student is receiving. School is required to provide all financial information and its notification to all students receiving FSA funds. School also should provide information about the Pell Grants eligible students to obtain or purchase books ad supplies by the seventh day of payment period. They should be informed the process of "Opt out" to

obtain the fundings. During the counselling, all FSA school should tell who are eligible to qualify for books and supplies, who can ‘Opt Out’.

## Disbursement for Books & Supplies Procedures

### 1. Responsibilities

1. Financial Aid Administrator
  1. Informa all students eligible students to receive their books and supplies by the 7<sup>th</sup> day of the payment period
  2. Must sure to include total costs of books
  3. Make sure all books and supplies are given to only eligible students.
  4. Make sure students get all information about the funds advanced to purchase books and supplies, methods of process for the funds and their right to “opt out” the funds.
2. Finance Officer
  1. Make sure the monies are available with 7 days of the payment period

## Drug & Alcohol Abuse Prevention Program

### Drug & Alcohol Abuse Prevention Program Policy

Each employee and student will be provided with the following information annually

1. Information about the standards to prohibit the any unlawful possession, use and distribution of illegal drugs and alcohols during school’s activities or within school properties
2. Information about he applicable sanctions under federal, state or local law.
3. Information about the health risks
4. Information about the available counselling, treatment, rehabilitation or re-entry program

CTK buildings are designated as drug free zone to compliance with Public Law 101-226. The school abides by all state, federal, and local laws pertaining to alcohol and will enforce underage drinking laws. It is unlawful to possess, use, or distribute illicit drugs on CTK property or at any school sponsored event located on the property or any other property. The school prohibits the consumption, possession, and distribution of alcohols in school properties, or any events sponsored by school. Any kind of smoking are banned in CTK classrooms or other facilities occupied by staffs or students. Smoking is allowed in designated areas outside the building.

The use, possession, transfer or sale of any illegal drugs on campus premises or any CTK properties is prohibited. Use of illegal drugs and alcohol abuse may lead to the impairment of any employees or students. As a result there high risk of injury to others, impaired person itself or the third parties. "Impairment" or "being impaired" means that a person's normal physical or mental abilities or faculties while at work have been affected by the use of illegal drugs or alcohol. Impairment of any person while at work is a major violation of the school policy and subject to severe disciplinary action including suspension, dismissal and other disciplinary action under the school policy. Any disciplinary action will be administered at the sole discretion and determination of CTK and may notify to the authorities when required if found violation by Administration.

### **School and Legal Sanction**

The disciplinary action due to violation of school drug/alcohol policy by employee or students may result in a written reprimand, suspension, dismissal, reduction in pay, expulsion or termination. All illegal activities of substance abuse/ and/ or alcohol could result in criminal prosecution as well, under state and federal laws, including section 22 of the Drug Free Schools and Campuses Act Amendment of 1989 (Public Law of 101-226).

In addition to federal requirements, The Texas Workforce Compensation Commission TWCC Rule 169 (b) requires that Texas employers with Workman Compensation coverage and 15 or more workers provide a written copy of the Drug-Free Workforce policy to each employee on or before the first day of employment. Texas employers, employees and the Beaumont community at large are also subject to Texas Penal Code, Texas Alcohol Beverage Code Offenses, Texas Health & Safety Code Offenses, and City of Beaumont Code of Ordinances.

## Drug & Alcohol Abuse Prevention Program Procedure

### 1. Responsibilities:

1. Administrator
  1. Order promotional stuffs regarding drugs and alcohol prevention
  2. Gather literatures and data to validate information
  3. Prepare PowerPoint presentation on Drug and Alcohol Abuse Prevention program procedure
  4. Prove the power point to all students, make flyer and distribute to each student
2. Instructor
  1. Present the PowerPoint during a school wide assembly and or provide a guest speaker to present to the students.
  2. Ensure that lesson plans include 1 hour of presentation time for the school wide presentation.
3. School Director
  1. Ensure that event take places every year before July 1
  2. Ensure that above documents are issued to all students and employees
  3. Ensure that CTK Presentation survey is issued to all students and employees
  4. Evaluate the survey results
  5. Obtain the sign in sheet and components of the survey and presentation for documentation purposes.

## 4. Constitution and Citizenship Day

### Constitution & Citizenship Day Policy

In 2004, Congress passed a provision that every school and college that receives federal funding must teach students about Constitution of the United States each year on September 17, the day this historical document was adopted in 1787. School can determine the type of education program they want. However, the day must be named as “Constitution Day and Citizenship Day”. In case of

weekend or holiday on September 17, school must schedule a program after or before that date. Students will be familiar with the elements constitution through creativity and different activities. Daily lesson plan of each instructor should have an element of the constitution.

## Constitution & Citizenship Day Celebration Procedure

The objective of this celebration is to organize events with students involvement to provide education of the importance of Constitution Day.

### 1. Responsibilities:

1. Instructors
  1. Share information of constitution with students
  2. Conduct school wide educational or informational activities related to the constitution
2. Finance Officer
  1. Distribute information about the date and venue to celebrate the Constitutional Day.
  2. Organize a meeting with everyone with refreshments, if possible.
3. School Director
  1. Participate and celebrate the Constitution Day will faculty, staff and students.
  2. Make budget available for the Constitution Day celebration.
  3. A folder will be maintained at Director's Office with information on participants, scheduled activities, publications, notices, and photos/exhibits of Constitution Day celebration.



# Gainful Employment General Information

## Gainful Employment Policy

Published on October 31, 2014 Gainful Employment Regulations requires any educational institution publish GE data intended for using by general public, perspective students and other regulatory bodies. To be eligible for Title IV program, an institute must prepare students for “gainful employment in a recognized occupation”. Hence all profit or non profit educational institutions offer programs that must lead to the gainful employment.

Through a Circular dated June 28, 2019 the Department of Education announced the rescission of the Gainful Employment Rule. “Those institutions that early implement will not be required to comply with the current requirements in 34 CFR 668.412 (d) and (e) that require institutions to include the disclosure template, or a link thereto, in their GE program promotional materials and directly distribute the disclosure template to prospective students, which will be required starting on July 1, 2019. Institutions that early implement will no longer be required to post the GE Disclosure Template and may remove the template and any other GE disclosures that are required under 34 CFR 668.412 from their web pages. Finally, an institution that early implements will not be required to comply with the certification requirements for GE programs under 34 CFR 668.414.”

## Gainful Employment Procedure

- 1. Responsibilities:**
  - 1. School Director**
  2. Will implement the new GE Rules

# FERPA Requirements

## FERPA Policy

This institution complies with the Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is federal law that protects students' certain rights related to their educational records. The following is a description of those rights:

1. The right to inspect and review the student's educational records within 45 days of the day the Institution receives a written request for access. Students should submit to the President written requests that identify the record (s) they wish to inspect. A School Official will make arrangements for access and notify the student of the time and place where the records may be inspected.
2. The right to consent to disclosures of personally identifiable information contained in the student's education records, except to the extent that FERPA authorizes disclosure without consent. One exception, which permits disclosure without consent, is disclosure to institution officials with legitimate educational interests. An institution official is a person employed by the institution in an administrative, supervisory, academic, research, or support staff position (including law enforcement unit personnel and health staff). A person or company with whom the Institution has contracted (such as an attorney, auditor, or collection agent); a person serving on the Board of Trustees; a student serving on an official committee, such as a disciplinary or grievance committee, or assisting another institution official in performing his or her tasks. An institution official has a legitimate educational interest if the official needs to review an educational record in order to fulfill his or her professional responsibility. Upon request, the Institution discloses educational records without consent to officials of another institution in which a student seeks or intends to enroll.
3. Directory information is information that may be unconditionally released to third parties by the school without the consent of the student unless the student specifically requests that the information not be released. The school requests students to present such requests in writing within 10 days of the date of enrollment. Directory information includes the student's name, address(s), telephone number(s), birth date and place, program undertaken, dates of attendance, and certificate or diploma awarded.

The right to file a complaint with the U.S. Department of Education concerning alleged failures by this Institution to comply with the requirements on file is as follows:

**Family Policy Compliance Office  
Department of Education,  
600 Independence, SW  
Washington, DC 20202-4605**

## **FERPA Procedure**

### **1. Responsibilities:**

1. Admission Administrator
  1. Explain about FERPA to all students during the enrollment and make sure all students complete the FERPA form. process.
2. School Director or Designee
  1. Annual release FERPA form to all students and To annually release the FERPA form to all current students notifying them of their option to change or update their FERPA information. During this time, they are also updated on their FERPA rights.
  2. Employees are also given an in-service on FERPA, students' rights, confidently and the policy of the FERPA.

# Clery Information

## Safety and Security Annual Survey

### *Safety and Security Annual Survey Policy*

In 1990, Congress enacted the Crime Awareness and Campus Security Act of 1990 (Title II of Public Law 101- 542), which amended the Higher Education Act of 1965 (HEA). This act required all postsecondary institutions participating in HEA’s Title IV student financial assistance programs to disclose campus crime statistics and security information. The act was amended in 1992, 1998 and 2000. The 1998 amendments renamed the law the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act in memory of a student who was slain in her dorm room in 1986. It is generally referred to as the Clery Act.

On Aug. 14, 2008, the Higher Education Opportunity Act or HEOA (Public Law 110-315) reauthorized and expanded the Higher Education Act of 1965, as amended. HEOA amended the Clery Act and created additional safety- and security-related requirements for institutions. Specifically, it includes: “Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution’s educational purposes, including residence halls; and Any building or property that is within or reasonably contiguous to the area identified in paragraph (1) of this definition, that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor)”[*U.S. Department of Education, Office of Postsecondary Education, The Handbook for Campus Safety and Security Reporting, 2016 Edition, Washington, D.C., 2016.*]

Safety and security of students is the primary concern of CTK Healthcare and Career Institute. CTK is committed to comply with safety and security guidelines set by Crime Awareness and Campus Security Act of 1990, Federal Law, State and Local Law. Firearms and other weapons are strictly prohibited across school properties as directed by the law and policies. CTK has zero tolerance policy against immoral conduct regarding verbal, sexual, and physical harassment of a fellow student or staff members as well as threat of physical violence against a fellow student or staff member.

## *Procedure*

### **1. Responsibilities:**

1. School Director
  1. Responsible for the recruitment of Campus Security Awareness (CSA) Coordinator and CSA Team
  2. Define the scope and responsibilities of CSA Coordinator and Team
  3. Oversee the activities of CAS Coordinator and Team
  4. Evaluate all incidents reported by CSA Coordinator
  5. Criminal incidents may be turned over to local authorities for further investigations.
  6. Determine the sanction based on the nature of the incident
  7. Prepare and distribute the annual security report by October 1
  8. Held presentation to address dating violence, domestic violence, sexual assault, and stalking.
2. Campus Security Awareness Coordinator
  1. Perform yearly trainings for the CSA team's members on Crime Logs and Emergency Reporting (ER) procedures
  2. Submit the Crime Logs to School Director and alert Campus Director of all criminal activities.

### **Updating Clery Policy**

CTK is committed to annual update crime statistics and is made available to all perspective students, current employees, and current students. Copies of this report are available through

1. [www.ckhealthcare.com](http://www.ckhealthcare.com)
2. Notice Board and student lounge
3. At the Financial Aid Office

## *Procedure*

### **1. Responsibilities:**

1. Admission/ Financial Administrator
  1. Alert the perspective student of the report during the enrollment process through the enrollment packet.
  2. Alert current students of the report and it's components and location on the campus and the website or include in enrollment package.
2. School Director
  1. Revise and review Crime Logs from the Crime Security Awareness Coordinator no later than July 1 of each year
  2. Contact local law enforcement department with a formal request via email or postal mail service requesting a crime report for the geographical location of CTK
  3. Based on the information retrieved, compile a report with the most 3 completed years updated.
  4. Send out notifications to all employees and students of the newly reported report via email and text messaging
  5. Release the report by Oct. 1 of each year.

## **Violence Against Women Act (VAWA)**

### **Violence Against Women Act Policy**

The Violence Against Women Reauthorization Act of 2013 (Pub Law 113-4)(VAWA) signed into law by President Obama on March 7. The HEA defines the new crime categories of domestic violence, dating violence, and stalking in accordance with section 40002(a) of the Violence Against Women Act of 1994 as follows:

“Domestic violence” means a “felony or misdemeanor crime of violence committed by—

1. A current or former spouse or intimate partner of the victim,
2. A person with whom the victim shares a child in common,

3. A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner,
4. A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies [under the VAWA],
5. Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction"

**In the event of a crime act of this nature, all information will be held in the strict confidence. Only information pertain to the incident will be disclosed to the personnel or law enforcement on an as needed basis. The victim must sign a FERPA to release information to other parties (family members etc.).**

CTK is committed to providing options, support and assistance to victims/ survivors of sexual assault, domestic violence, dating violence, and stalking

**6. Responsibilities:**

*Please report any known criminal offenses occurring on campus to the school administration*

School Director, in the absence of the School Director, individuals should seek out any CTK staff member.

1. The Institution encourages all students and employees to be responsible for their own security and the security of others.
2. In the event a sex offense should occur on campus; the victim should take the following steps:
  1. Report the offense to the school administration.
  2. Preserve any evidence as may be necessary to the proof of the criminal offense.
  3. Request assistance, if desired, from school administration in reporting the crime to local law enforcement agencies.
  4. Request a change in the academic situation if necessary.

# VAWA Disciplinary Hearings

## VAWA Disciplinary Hearings Policy

Any disciplinary action related to alleged sexual assault will be based on the findings of the law enforcement agency investigating the facts pertaining to the crime and other mitigating circumstances.

Information for crime victims about disciplinary proceedings. The institution will disclose the results of any disciplinary proceedings conducted by the institution against a student who is the alleged perpetrator of such crime or offense, upon written request by the alleged victim and the accuser of any crime of violence, or a non-forcible sex offense, (alleged dating violence, domestic violence, sexual assault, or stalking as defined in 34 CFR 668.46(a)). The information will be released to the next of kin of the alleged victims in case of his/her decease because of the crime or offense. This provision applies to any disciplinary proceeding conducted by CTK on or after January 2013.

CTK is committed to provide a prompt, fair, and impartial disciplinary proceeding in which

- (1) officials are appropriately trained conflict of interest or bias for or against the accuser or the alleged person;
- (2) both the accuser and the alleged have equal opportunities to have others present, including an advisor of their choice;
- (3) the accuser and the alleged receive simultaneous notification, in writing, of the result of the proceeding and any available appeal procedures;
- (4) the proceeding is completed in a reasonably prompt timeframe;
- (5) the accuser and alleged are given timely notice of meetings at which one or the other or both may be present; and
- (6) the accuser, the alleged, and appropriate officials are given timely access to information that will be used after the fact-finding investigation but during informal and formal disciplinary meetings and hearings.

## VAWA Disciplinary Hearings Procedure

### 5. Responsibilities:



1. Student
  1. File a formal complaint via writing, video, or verbally
  2. Alleged will be notified in writing or verbally of alleged crime
2. School Director
  1. Report allegation to official authorities at CTK and/ or law enforcement (may be optional)
  2. CTK/or Law enforcement conducts a full investigation of allegations along with collection of evidence
  3. Possible sanctions of alleged students during investigation may include suspensions, Leave of Absence, or change in program section until investigation is complete.
  4. Victim may have the option of utilizing Victim Rights (see rights on Financial Aid website)
  5. Based on the findings made by law enforcement or CTK, a written notice will be issued to the alleged or victim

## VAWA Collecting Data

### VAWA Collecting Data Policy

Campus Security Awareness Team members are defined as an individual or individuals who have responsibility for campus security but who do not constitute a campus police department or campus security department. CSA's Coordinator and/ or team members are responsible for documenting all crimes on official log and reporting them to the CSA Coordinator. These individuals collect data throughout the year on activities that fall under the VAWA and Campus Crime Reports. They are assigned by the School Director.

### VAWA Collecting Data Procedure

The purpose is to gather data and documentation of crimes.

#### **2. Responsibilities:**

1. Campus Security Awareness Team
  1. Collect data yearly via Crime logs

2. Submit logs to School Director monthly
2. School Director
  1. Reviews the logs
  2. Ensures that all incidents have been reported to local officials
  3. Contacts the local law enforcement by July each year via email for the information for the annual report
  4. Compile the information for the annual report
  5. Updates the information
  6. Submits by October 1 to Clery department, current students, and employees.

## VAWA Prevention and Awareness

### VAWA Prevention & Awareness Policy

CTK will conduct yearly school wide event each Spring that incorporates information on the Sexual Violence and Violence Against Women. It offers resources and information on how to protect and protect others who may be a victim of criminal activity.

### VAWA Prevention & Awareness Procedure

#### 3. Responsibilities:

1. Financial Aid Administrator
  1. Contacts the local battered women's shelter or qualified counselor to schedule a presentation to address the students during an assembly.
  2. Place order to any promotional items at least a month in advance, if desired
  3. Ensure that each students and employee signs the sign in sheet.
2. Instructors
  1. Prepare lesson plans to incorporate 1 hour for a presentation on Sexual Violence and Violence Against Women

3. School Director
  1. Keeps copies of sign in sheets and documents of presentation in Director's office.

## Emergency Response & Evacuation Procedures FSA Assessments

### **Emergency Response & Evacuation Procedures FSA Assessments Policy**

Each instructor in class is responsible to take the lead of his/her class for the safe and orderly evacuation process during an emergency evacuation. Other instructors not in class should assist with any evacuation process. All instructors are responsible for preventing panic, control, and calm leadership during the emergency evacuation period. Everyone should consider the guidelines below:

### **Emergency Response & Evacuation Procedures FSA Assessments Procedure**

#### **Fire**

1. All parties are notified of a Fire Emergency by the building fire alarm/ and or verbal drill
2. All Instructors are to immediately obtain Walkie Talkies/ and/ or announce verbally and begin vacating from the building
3. All instructors and students are to immediately exit to the nearest and safest exit door.
4. Once all persons are exited, everyone should move to the parking lot away from the building.

5. Instructors should immediately take role to ensure all students are accounted for using CTK walkie talkies and/ or gradebooks.
6. Once emergency staff gives clearance, all parties will be allowed to exit or enter the building.

### *Weather*

7. All instructors and staff members should move to the middle of building away from all windows. This procedure should be done until all is clear it is safe to either exit the building or return to designated classroom.

## Timely Warning & ER Notifications

### Timely Warning & ER Notifications Policy

Colleges and universities should compliance with “Timely warnings and emergency notifications” of federal Clery Act to inform the school community about threats that a serious crime is going or may repeated. CTK notifies these warnings to school community via email, institutional texting system, letter or phone.

A school must report the crimes on campus to the campus community to prevent future similar crimes that includes campus come statistics such as arson, robbery, burglary, motor vehicle, theft, aggravated assault, criminal homicides, and sex offenses when considered as threat to the campus community.

The institution must follow the emergency notification procedures in case there is an immediate threat to health and safety of students and employees. The school needs to provide enough follow up information to the school community. However, CTK follows its emergency notification procedures, the institute is not required to issue a timely warning for the same circumstances.

### Timely Warning & ER Notifications Procedure

4. **Responsibilities:**
  1. School Director

1. Will issue a timely warning in the event of emergency situations via text and voice messages through CTK email and/or phone.
2. Will issue Test text and voice notifications via twice a year. This will be conducted once in the Spring and once in the Summer
  1. Student will be notified of the test 1 week prior to the test
  2. If the test is unsuccessful,
2. Students
  1. If the test is unsuccessful, the students will notify the Director to update or trouble shoot reason for failed test.
3. Financial Aid Administrator
  1. Will update the student's record
  2. Notify the School Director of the update via private message
4. School Director
  1. Submit an additional timely notification test to students who updated their information.

## **Emergency Health and Safety Plan for students, employee, and visitors**

CTK has a responsibility to maintain a safe and healthy environment including emergency plan for students, employee and visitors while they are on campus. This plan outlines the procedures to follow in case of sickness, accidents, or emergency health care needs that arise while on campus. CTK does not have health services located on the campus; however, hospitals, clinics, and physicians are located nearby. Students with communicable diseases may be prohibited from registering for classes when health records indicate that his/her attendance would be detrimental to the health and safety of staff and other students with whom the student may meet. Students who have significant health problems or limitations may be required to submit a report of medical examination prior to initial registration.

### **Outline of activities and the person responsible**

Following are the outline and the person responsible to take care of the outlines that falls under the plan

### **1. Basic First Aid**

Basic first aid supplies are available for student use in the front office and student phone area. First aid kits are equipped with supplies such as Band-aids and minor wound care materials. Any person in campus unable to locate the proper first aid supplies, please report to the student services coordinator or the finance office know so that kits can be located and restocked as needed.

### **2. Accident, biohazard & Health /Safety Emergencies**

Steps to follow:

1. Any persons in the facility report his/her sickness, accidents and emergencies immediately to the student services coordinator or Emergency Safety Contact person or the instructor in the class.
2. The student service coordinator or Emergency Safety Contact person will assess the situation and determine the appropriate course of action.
3. If necessary, the CAO or his designee or student service coordinator will call 911 for further assistance.
4. If the student is conscious and refuses treatment, the executive director or his designee will notify an emergency contact noted in the student's file.
5. After the emergency is over, the student service coordinator will be responsible for investigating the incident and completing an incident report.
6. Upon calling 911, information on the accident victim, type and location of injury, location of accident and phone number should be provided.
7. Do not move the student if there appears to be a head, neck, or back injury due to a fall.
8. If the student needing assistance cannot walk and needs assistance, the area where the student is located should be cleared. Keep the student as calm and comfortable as possible.
9. Stay with the student needing assistance until medical help arrives.
10. Only trained personnel should provide medical assistance to the student on school property.

11. If needed, a member of the crisis management team will contact the parent, guardian, or partner of the student.

Note: If a student is transported via ambulance or life squad, the student is responsible for the cost.

## **12. Weather Conditions**

In the case of an emergency while school is in session, the executive director has the authority to assess the situation and act accordingly. For emergencies occurring when school is closed, the executive director will assess the situation and determine whether classes will be held. If classes are cancelled, the CAO or facility coordinator will notify the media to make the announcement of delay in opening the class or school closing. In making such decision, the facility coordinator may rely on neighborhood colleges and school districts decision. It is the responsibility of facility coordinator to notify Instructors who will contact students residing out of the receiving area of the local media.

All instructors and staff members should move to the middle of building away from all windows. This procedure should be done until all is clear it is safe to either exit the building or return to designated classroom

## **13. Student Campus Security Policies**

Students and instructors are encouraged to report crimes to local authorities and to the student service coordinator of the school. In the event of an incident, student service coordinator should be called immediately to investigate and notify authorities if warranted.

Develop habits that insure security. For example, always keep cash property secured. Know the location of all alarms and fire extinguishers and know how to use them. Make sure that the entrance of the school is well lit

### **Before leaving the premises.**

Notify any visitors who might visit you with the receptionist in the front lobby before entering any part of the facility.

Students should keep the photo identification card issued the day of orientation with them at all times.

#### **14. Safety Rules**

Safety is everyone's responsibility. Safety must be given primary importance in every aspect of planning and performing school activities. All the employee report all injuries, regardless of how minor, to the student service coordinator or instructor. Accidents generally occur because individuals fail to follow the proper safety rules. By following the safety rules listed below, you will minimize your chances of having an accident while at CTK.

1. Avoid overloading electrical circuits with too many machines.
2. Use flammable items with caution. Always follow the printed procedures on the product.
3. Walk—don't run.
4. Report sickness, accidents and emergencies of fellow students to the executive director or department chair.
5. Ask for assistance when lifting heavy furniture or objects.
6. Smoke in designated areas only.
7. Keep cabinet doors and file and desk drawers closed when not in use.
8. Keep your work area clean or orderly.
9. Stack materials only to safe heights.
10. Use the right tool for the job, and use it correctly.
11. Avoid practical jokes.
12. Do not operate any equipment unless you have been properly trained to do so.
13. Wear eye protection when indicated.
14. Use the proper safety equipment required for the job.
15. Watch out for the safety of fellow students.

#### **Evaluation**

The effectiveness of this plan is evaluated based upon information that is provided by students through formal and informal means and revised needed, annually once a year by staff meeting and/or by advisory board and made the plan public by keeping the plan in main hallway. Incident reports are reviewed to determine if preventive measures can minimize or eliminate health and safety issues involving students. Changes are made if indicated.



# Biennial Review

## Biennial Review Policy

The Biannual Review of alcohol and other drug by all higher education institutes are required by federal law. The Biannual Review by CTK is available to public upon request and distributed to all students and employees. The Biannual of CTK determines:

1. Effectiveness of the program and implements needed changes
2. The number of drug and alcohol related violations in college properties or events
3. Number of and type of sanctions that are imposed
4. Efforts that sanctions are consistently enforced.

## Biennial Review Procedure

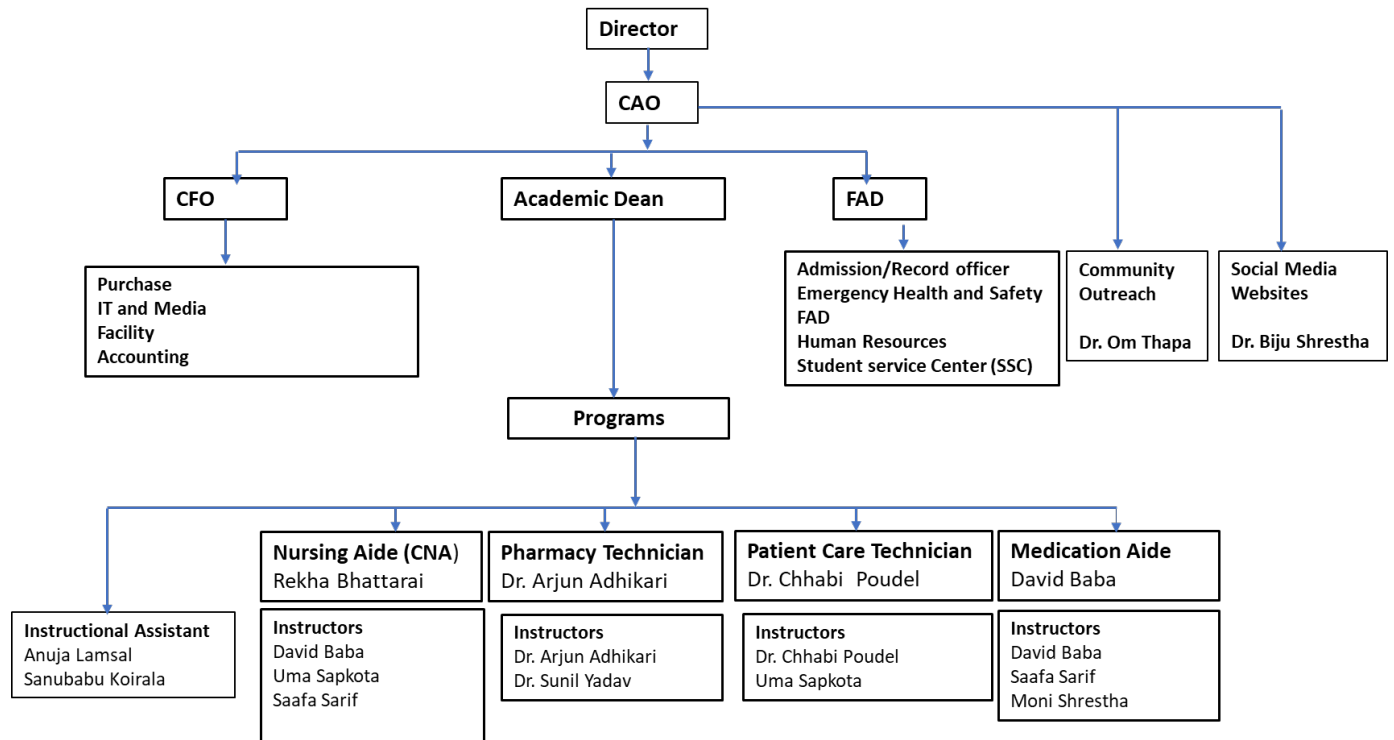
### 1. Responsibilities:

1. School Director and assigned staff members
  1. On the even years, during the 2<sup>nd</sup> Quarter by July 1<sup>st</sup> a review of the Drug and Alcohol handbook will take place updating all needed changes; the first review is schedule in 2019 every 2 years
  2. The updated review will be posted on school's website, school student break area, and at the financial aid office

# Title IV, Funding HEA Topics

## Organizational Chart

### Organizational Chart



# Calculating Pell Grant and other FSA for adds or drops a crossover class

## Calculating Pell Grant and other FSA for adds or drops a crossover class Policy

Students who enrolled for the crossover year must complete the new award year FASFA for the new award year.

**CTK Healthcare** measures progress in Clock Hours, and used the Payment Period for the period of calculation.

CTK estimates the amount of Title IV aid that could be earned as follows:

- a. Divide the number of clock hours scheduled to be completed in the payment period as of the last date of attendance in the payment period by the total clock hours in the payment period.

**HOURS SCHEDULED TO COMPLETE**

**TOTAL HOURS IN PERIOD = % EARNED**

- b. If this percentage is greater than 60 %, the student earns 100%.
- c. If this percent is less than or equal to 60%, proceed with calculation.

Percentage earned X total aid disbursed, or could have been disbursed = **Amount Student Earned.**

Subtract the Title IV aid earned from the total disbursed = Amount to be Returned.

100% minus percent earned = **Unearned Percent**

Unearned percent (multiplied by) total institutional charges from the period = **Amount Due from the School.**

If the percent of Title IV Aid disbursed is greater than the percent unearned (times) institutional charges for the period, the amount disbursed be used in place of the percent unearned.

If the percent unearned (times) institutional charges for the period are less than the amount due from the school, the students must return or repay one-half of the remainder unearned Federal Pell Grant.

Student is not required to return the overpayment if this amount is equal to or less than 50% of the total grant assistance that was disbursed and/or could have been disbursed. The student is also not required to return an overpayment if the amount is \$50 or less.

## Calculating Pell Grant and other FSA for adds or drops a crossover class Procedure

- Responsibilities:
  - Financial Aid Officer
    - Completed the new award year FASFA
    - Bring in updated supporting documentation
    - If required complete verification forms
    - Update students regarding about new award year information
    - Consult with FAME when required

## Entrance Counseling

### Entrance Counseling Policy

Entrance counseling is designed to ensure each financial aid receiving student understand the terms and conditions of loan and their rights and responsibilities. Each student required to complete the Entrance Counseling before receiving the First Direct Subsidized Loan and Direct Unsubsidized Loan or Direct PLUS Loan (graduate and professional students only) or Federal Family Education Loan (FFEL) for the first time.

Required documents of each student for current approval, and any prior approvals of Title IV will be available for review from the National Student Loan Data System (NSLDS). The documents includes but not limited to transcript or proof of previously received Title IV, or other

documentation from a previous institution that demonstrates Title IV enrollment. A counseling session will take 20-30 minutes of uninterrupted time to complete.

## Entrance Counseling Procedure

- **Responsibilities:**
  - **Financial Aid Officer**
    - Contact student and guide students to complete Entrance Counseling
    - Inform Student Entrance Counseling is required before you can receive your first Direct Subsidized Loan, or Direct Unsubsidized Loan as an undergraduate, or your first Direct PLUS Loan as a graduate/professional student.
    - Print a copy of the Entrance Counseling for the record in FA file

## Exit Counseling for student who unofficial withdrawal

### Exit Counseling for student who unofficial withdrawal Policy

Each student receiving financial aid required to complete the Exit Counseling when s/he leaves school, graduates or drop below half-time enrollment. This ensures the student understands their federal loan obligations and are prepared for repayment. This regulation applies to all students receiving any types of federal student loan including subsidized, unsubsidized, or PLUS loan under the Direct Loan Program Federal Family Educational Loan (FFEL). To complete Exit Counseling each student need 20-30 minutes of uninterrupted time.

### Exit Counseling Procedure

- **Responsibilities:**
  - **Financial Aid Officer**
    - Contact student and guide students to complete Entrance Counseling

- Inform Student Entrance Counseling is required before you can receive your first Direct Subsidized Loan, or Direct Unsubsidized Loan as an undergraduate, or your first Direct PLUS Loan as a graduate/professional student.
- Print a copy of the Exit Counselling for the record in FA file

## Loan Deferments

### Loan Deferments Policy

Under certain circumstances, *Deferment or forbearance* allows you to temporarily stop making payments or reduce federal student loan. Postponing or reducing your payments may help you avoid default.

During the deferment period, repayment of the principal and interest of your loan is temporarily delayed. To apply for deferment or forbearance, you need to work with *loan servicer* and continue to make payment until the deferment or forbearance is in place. Government may pay interest of your loan during this period which depends on the types of loan reported below.

- *Federal Perkins Loan,*
- *Direct Subsidized Loan,* and/or
- *Subsidized Federal Stafford Loan.*

However, Government does not pay the interest of your unsubsidized loan. You are responsible for the payment of interests that accumulates during the deferment period. The unpaid interest during the deferment period may be capitalized and your principal loan amount will be higher in the future.

### Loan Deferments Procedure

- **Responsibilities:**
  - Financial Aid Officer
    - In School Deferment Request

- If the student had a Direct Loan at a previous school they attended, they can request a deferment while attending the current school. In case of the a loan from a bank or other lender, the student needs to obtain the deferment form from their lender. The student fills out their part and CTK will complete its part and process it.

- Out of school Deferment Request

- Most deferments are not automatic, and you will likely need to submit a request to your loan servicer, the organization that handles your loan account. If you are enrolled in school at least half-time and you would like to request an in-school deferment, you'll need to contact your CTK financial aid office as well as your loan servicer.
- Your deferment request should be submitted to the organization to which you make your loan payments.
  - Direct Loans and FFEL Program loans: contact your loan servicer

## Organizational Structure-Finance Office and Financial Aid Office

### Organizational Structure- Finance Office & Financial Aid Office Policy

CTK has two main departments to handle financial matters including Finance Office and Financial Aid Office

- The Finance department includes Institutional Eligibility which maintains recertification, and all administration capabilities. Finance Department involves in managing consumer information, Fiscal Management, and reporting and reconciling monthly financial reports, return to FSA funds.
- The Admission/Financial Aid department oversee reenrollment, interview, enrollment and student eligibility.
- The Financial aid office oversee FSA related matters including but not limited to Title IV student eligibility, handles the Default Management Prevention.
- The Education Department provides educational tools and resources to students for completion of program, success and transition.

- School Director makes sure the financial Aid program is in compliance with regulations

## Organizational Structure- Finance Office and Financial Aid Office Procedure

To become familiar with the organization structure of finance and financial aid offices.

- **Responsibilities:**
  - **Admission/Financial Aid Officer**
    - Work with the Finance Administrator and FAME to process FSA (e.g., Federal Financial Aid PELL grants and loans).
  - **Finance Officer**
    - Work with Financial Aid Officer, FAME, and School Director with the disbursement of Financial Aid funds.
    - Fiscal Management, Reporting and reconciling monthly financial reports and returns of FSA funds
  - **School Director**
    - Makes sure the Financial Aid Programs are in compliance with the federal regulations set forth by the State and Department of Education

## Cost of Attendance Budget for all Programs

### Cost of Attendance (COA) Budget for all Programs Policy

COA is the total estimated expenses for one year including tuition, books, transportation, room and boards, supplies, loan fees and miscellaneous expenses. CTK uses COA to determine financial aid eligibility of each student including grants and loan. COA estimation at CTK is based on the individual student Federal Student Aid non-need-based on award eligibility, the student's program, and dependency status. The remaining FSA need based award eligibility is calculated based on the student's COA minus Economic Family Contribution (EFC). COA is documented individually in the enrolled student's files



upon receipt of a valid Institution Student Report (ISIR) from the United State Department of Education. COA is provided to prospective or enrolled students upon request.

### **Direct Costs**

1. Tuition and fees normally assessed for a student carrying the same academic workload – This information is provided by the school for each program it offers which is eligible for Title IV aid
2. An allowance for books, supplies, - Based on program at a school.

### **Indirect Costs:**

3. Transportation and miscellaneous expenses – Average of the various means of transportation and other miscellaneous expenses used by students attending the school.
4. An allowance for room and board – This depends on whether a student is living with family at home or living on his/her own. A student living off campus housing allowance is higher compared to that of a student living with parents. It is possible for an independent student to live with his/her parents, in which case you should use the “living with parent” cost of attendance. An average is used for all room and board allowances.

When the calculations are complete, there are two costs of attendance for each program offered at the school (one for students living with their parents and one for students living off campus).

The Cost of Attendance is the starting point for calculating a student’s financial aid. The Expected Family Contribution, as determined by the ISIR, will be deducted from the Cost of Attendance to establish a student’s eligibility for financial aid.

If the student claims he/she is living off campus and the promissory note that the school may have in the file indicates the student is living at the same address as the parent, the school must use the “living with parent” cost of attendance.

## **Cost of Attendance Budget for all Programs Procedure**

- ***Responsibilities:***
  - Financial Aid Officer
    - Contact the student once she or he receives the ISIR

- Populate the students Cost of Attendance based on the information on the ISIR and program of interest and academic year
- Generate an award letter based on the information provided
- Discuss info with the student
- Have student sign the award letter to accept, deny, or change
- Give copy to the student
- Allow students to complete enrollment forms with Admission counselor

## General Eligibility Criteria for FSA Program Funds

### General Eligibility Criteria for FSA Program Funds Policy

CTK is committed to ensure that each student is eligible to receive Federal Student Aid (FSA) programs. The Financial Aid Department of CTK is committed to assist student determine their eligibility for FSA.

### General Eligibility Criteria for FSA Program Funds Procedure

- ***Responsibilities:***

- Admission Officer
  - Verify High School Diploma or other eligible academic credentials (e.g. Transcript, GED or College Diploma)
  - Verify other eligibility documents (e.g. Driver license, SSN, ID card etc)
  - Check and sign all enrollment forms
- Financial Aid Administrator
  - Interviews the student and assist on FASA application process whenever needed
  - Check to ensure that student is not in Default
  - Have a valid ISIR

- If selected for Verification, submit all documents to clear the verification request
- Complete the entrance counseling
- Check the NSLD web site for borrowing limits and other documents needed from previous schools (transcripts)

## Eligibility Criteria for State Aid Assistance

### Eligibility Criteria for State Aid Assistance Policy

As of July 1, 2015, Any schools fails to compliance with these regulations may lose participation in all Financial Student Aid programs, unless and until they prove as they have been working on it with their state on a school-by-school basis for authorization by the State for the eligibility of providing post-secondary education in their state. As a Texas State agency, TWC Career Schools and Colleges has approved CTK to operate as a post-secondary school. This approval is renewed each year in June.

### Eligibility Criteria for State Aid Assistance Procedure

- **Responsibilities:**
  - School Director
    - To submit the required documents to TWC for renewal each year when notified by TWC.
    - Keep copies of all documents and approval notices in the Director's Office.

## Processing Aid Applications

### Processing Aid Applications Policy

CTK encourages students to utilize Federal Student Aid to assist them with funding for programs eligible for Title IV Aid. CTK Financial Aide Officer assists any students who choose to complete the

application on site, or they can apply from home and call the CTK counsellor for assistance or questions. After the submission of application, CTK receives their FAFSA and SIR to determine their eligibility.

## Procedure

- ***Responsibilities:***

- Financial Aid officer
  - Financial Aid interview with prospective students of the eligible program
  - Discuss FA options
  - Student Acceptance
  - Complete the FAFSA
  - Interviews the student and assist if needed on the application process for FSA
  - Check to ensure that student is not in Default
  - Verify Selective Service status
  - Verify High School Diploma
  - Verify Dependent or independent status
  - Complete verifications on student if applicable
  - Check Default rate
  - Verify all info on ISIR is correct
  - Package student- Award letter
  - Have students accept, deny, or reduce possible loan amounts
  - Check the NSLD web site for borrowing limits and other documents needed from previous schools (transcripts)
  - Complete the entrance counseling
  - Contact finance office of new students and refunds to be received

# Calculation of Payment Period/Awarding of Aid

## Calculation of Payment Period/Awarding of Aid Policy

The institution has set up payment periods with the assistance of the Financial Aid Administrator, and the Finance Officer. As CTK is a clock hour school, payment period is defined not only in clock hours but also in weeks of instructional time.

## Calculation of Payment Period/Awarding of Aid Procedure

- **Responsibilities:**
  - Finance Officer and Financial Aid Administrator notify the students of the information below:
    - 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 1/2 the clock hours AND 1/2 the weeks of instructional time in the program.
    - The second payment period is the next 1/2 the clock hours and 1/2 weeks of instructional time in the program.

**Pell Grant** - the amount varies year to year. There is a Maximum Award and Minimum Award),  
Aggregate Limit – None

### **Direct Loans –**

- Interest Rates: varies year to year
- Congress has passed, and the President has signed the Bipartisan Student Loan Certainty Act of 2013 which ties federal student loan interest rates to financial markets. Under this Act, interest rates will be determined each spring for new loans being made for the upcoming award year, which runs from July 1st to the

following June 30th. Each loan will have a fixed interest rate for the life of the loan.

- The amount of loan and the interest rate for different types of loans vary year to year. The following link to Federal Student Aid website provides the current information on loan amount and the interest rate:

<https://studentaid.gov/understand-aid/types/loans>

## Packaging Aid

### Packaging Aid Policy

The general rule in packaging is that the student's total financial aid must not exceed the student's financial need (Need = Cost of Attendance (both direct and indirect costs) minus the EFC) the need will be filled with various financial aid programs.

### Packaging Aid Procedure

- **Responsibilities:**
  - **Financial Aid Officer**
    - A Pell Grant is considered to be the first source of aid to the student and packaging begins with Pell eligibility.
    - Check the NSLDS for default and or does not owe a refund on a grand from another school.
    - Check NSLDS to ensure that the student has not received Title IV aid for the same academic year
    - Check COD for the Pell LEU (Lifetime Eligibility Used)
    - You will use the STARS Packaging sheets to determine the financial aid available.
    - The general rule in packaging is that the student's total financial aid must not exceed the student's financial need (Need = Cost of Attendance (both

direct and indirect costs) minus the EFC) the need will be filled with various financial aid programs.

- Be sure the ISIR has correct information – Name, Social Security # - Date of Birth – address – telephone number as you will need these to process financial aid
- Upload documents to RGM portal
- Have students sign all Financial Aid documents in FA file (award letter)

## Identifying Payment Periods for Each Program

### Identifying Payment Periods for Each Program Policy

Eligibility of each student is evaluated at the end of the payment period if the student meets all requirement. The requirements include completion of clock hour, weeks of instruction, attendance, and grade point average (GPA) in order to be eligible for the next Title IV, HEA funding disbursement.

#### ***Responsibility/Tasks included in this policy:***

Title IV, funding and SAP Evaluation points SAP evaluation periods are based on actual instructional hours and weeks completed for the enrolled program. Students will be notified of all SAP evaluation results at the end of each payment period.

The following is an example of the minimum number of hours and weeks that a student must complete at the end of each payment period to be considered eligible to receive the next Title IV, HEA Aid payments.

**Pharmacy Technician** which is 600 clock hours and 16 weeks of instruction, the funding will be disbursed at:

#### **Payment Period Clock hours /Weeks –Medical Assistant**

Pay Period 2    Clock Hours 300    Week 8

**Patient Care Technician** which is 603 clock hours and 16 weeks of instruction, the funding will be disbursed at:

**Payment Period Clock hours /Weeks –Office Administrative Assistant**

Pay Period 2    Clock Hours 302    Week 8

\* Students must meet their clock hour, weeks of instruction, attendance and grade point average (GPA) requirements in order to be eligible for the next Title IV, HEA funding disbursement. Each student will be evaluated at the end of each payment period to determine eligibility. Please note: that If the student is not meeting the SAP requirements, they will place their Title IV, HEA funding in jeopardy which could also result in a loss of Title IV, HEA funding.

## Identifying Payment Periods for Each Program Procedure

- ***Responsibilities:***
  - Instructors
    - Monthly monitoring of clock hours, attendance, and Grade Point Average
    - Notify Academic Dean who are not progressing satisfactorily based on the attendance or academic progress
  - School Director
    - Conferences students of lack of hours, attendance or poor GPA
    - Alert the finance officewhen a student has meet the requirement GPA, clock hours and .
  - Finance officer
    - Alert Financial Aid of the students have met the payment period for their program

## Disbursements Policy for Pell and Direct Loans



## Disbursements Policy for Pell and Direct Loans Policy

CTK uses a third-party servicer, FAME Inc to manage Financial Aid efficiently including on time disbursements of Pell Grants and Loans of each student. Disbursements are applied to student's ledger cards and are notified via phone and or via email by Financial Aid office.

## Disbursements Policy for Pell and Direct Loans Procedure

- **Responsibilities:**

- Student – Each student required to complete FAFSA
- Financial Aid Officer
  - Confirm ISIR of each student generated in FAME portal
  - Checks the ISIR for correctness, comments and verification
  - Asked students to enter the correct information if any errors in ISIR and waits for new ISIR
  - Completes verifications
  - Complete the packaging of the Financial Aid
- Finance Officer
  - Once ISIR is cleared for payment, CTK enters the disbursement information in the FAME interface
- Educational Consultant Management
  - FAME submits disbursement information to COD for all students.
  - FAME requests fund and places the funds transfers on the FTP site; an email is automatically sent to the Financial Aid Office at the school; and receipts/award notifications for students who received their first disbursements are automatically put on the FTP site.
  - On the date of the Funds Transfer, the funds are deposited by USDE into the school's federal bank account.
  - The school moves funds from their federal bank account to school's operating account. The school credits each student's ledger card with the

Pell, SEOG or Loan payment using the date of the funds transfer with the funds transfer number in the reference column of the ledger.

- Students are notified via text or email of the disbursements
- FAME is notified through the finance office.

## Disbursement for Parent Plus

### Disbursement for Parent Plus Policy

The disbursements may be credited to the student's account or made directly to the student or parent. Note that these time frames for disbursing to the student's account (or directly to the student or parent) are different than those for paying FSA credit balances to the student or parent. CTK generally has 14 days to pay a Financial Student Aid credit balance to the student or parent, unless it has written permission to hold the credit balance.

### Disbursement for Parent Plus Procedure

- ***Responsibilities:***
  - Financial Aid Administrator
    - Alerts Financial Officer of the disbursement for the student
    - Place a copy of all student ledgers in the student's files
  - School Director
    - Ensures the student is good academic standing (attendance and academic progress)
  - Business Administrator
    - Applies the disbursement to the student ledger card/student account
    - Sends notification of disbursement to student via student portal email / text message
    - Prints and updated ledger card for student's FA and Ed files

- If, and overpayment is received check with FA to ensure that the Parent Plus loan can be addressed to the parent.
- Prepare overpayment to be mailed to parent or call parent to pick up overpayment within 14 days of receipt of the disbursement.
- Apply overpayment to student's account- print ledger card for Financial Aid and Education Department Files.

## NSLDS Responsibilities

### NSLDS Responsibilities Policy

CTK has been approved for participation in the FSA programs. After the enrollment in FSA approved programs at CTK, each student must have online enrollment access and the institute is responsible for reporting student enrollment data to the National Student Loan Data System (NSLDS) through an enrollment roster file. Enrollment information is used to determine if the student is still considered in school, must be moved into repayment, or is eligible for an in-school deferment. For students moving into repayment, the out-of-school status effective date determines when the grace period begins and how soon a student must begin repaying loan funds. CTK is required to report changes in the student's enrollment status, the effective date of the status, and an anticipated completion date. Changes in enrollment to less than half-time, graduated, or withdrawn must be reported within 30 days.

### NSLDS Responsibilities Procedure

- **Responsibilities**
  - **Financial Aid Officer**
    - Reports enrolled students to the NSLDS database along with anticipated completion dates
    - Reports when students has a change in enrollment status, graduated or withdrawn within 30 days.

- Reviews the NSLDS database to ensure students have not received Title IV funds for the current semester.
- Verify the roster file within 15 days and return to NSLDS- (This is completed with FAME- third party servicer)

## FISAP Responsibilities

### FISAP Responsibilities Policy

As CTK is responsible for the management of Financial Student Aid assistance, all offices at CTK must coordinate with each other to ensure its successful management. CTK's Financial Student Aid program management generally takes place in three functional areas:

The office of the Director

The Financial Aid Office

The Business Office.

### FISAP Responsibilities Procedure

- **Responsibilities:**
  - **School Director/Owner**
    - accurate, current, and complete disclosure of the financial condition of each federal aid program or project sponsored by Education Department;
    - effective control over and accountability for all funds, property, and other assets, including adequate safeguarding of all such assets to ensure that they are used solely for authorized purposes
    - comparison of actual expended amounts with amounts budgeted for each Financial Student Aid program;

- procedures according to the applicable terms of the FSA program for determining reasonableness, allowability, and allocability of costs
- examinations in the form of external or internal audits, which must be made according to generally accepted auditing standards and government auditing standards
- **Financial Aid Officer**
  - While a school’s financial aid office is usually assigned most of the responsibility for administering Financial SA programs, its role in the institution’s fiscal operation is a limited one.
    - ensuring proper filing of timely applications
- **Finance Officer**
  - The finance office provides critical services to CTK in managing both federal and non-federal financial aid programs. Administering the accounting, recordkeeping, and reporting functions related to CTK’s use of federal and other funds requires many detailed, complex systems
    - records that adequately identify the source and application of funds for sponsored activities and contain information on institutional awards, authorizations, obligations, unobligated balances, assets, income, liabilities, revenues, expenditures, and cash disbursements;
    - procedures to ensure the timely, efficient transfer of funds when they are advanced through electronic methods (these procedures must limit the time between the transfer of funds from the U.S. Treasury and cash disbursement by the school to students so that funds are disbursed no later than three business days following the receipt of funds, and do not result in excess cash.
    - accounting records that are supported by audit trail documentation
    - monthly reconciliation of individual student FSA awards as recorded in the financial aid, fianance office, student account, and Department systems (for Pell and Direct Loan).

## Institutional

# Updating ECAR

## Updating ECAR Policy

In case of a change of ownership, adding new programs, recertification, closure of a location, changing to clock hours to credit hours, and or adding additional locations, CTK updates Eligibility and Certification Approval Record (ECAR).

### Updating a program

After completion of recertification application, each school must update information about its educational programs including updating CIP codes, program names, and program lengths. A school must update its E-App with changes to GE programs within 10 days of making the change. Schools should note that making a substantive change to a program may result in the creation of a new program.

CIP codes Classification of Instructional Programs (CIP) codes are developed by the U.S. Department of Education's National Center for Education Statistics. (<http://nces.ed.gov/ipeds/cipcode>)

### Approval for clock-hour programs at proprietary schools

If a proprietary school submitting an E-App is in provisional status, any new program needs to have been continuously provided for at least two (2) years prior to the application date, or it cannot be approved until the school reaches the two year mark.

Short-term programs at all institutions must have been continuously provided for twelve months to be considered for approval.

### Limitations for schools subject to “2-year rule”

For schools subject to the 2-year rule, during the school's initial period of participation in the FSA programs, the Department will not approve adding programs that would expand the school's eligibility beyond the current ECAR. An exception may be considered if the school can demonstrate that the program was legally authorized and continuously provided for at least two years prior to the date of the request. In addition, a school subject to the 2-year rule may not award FSA funds to a student in a program that is not included in the school's approval documents.

## Updating ECAR Procedure

- ***Responsibilities:***

**School Director** School Director works with the Finance officeto update ECAR

- Complete the ECAR with updated information to Department of Education
- Completes the E-APP no later than 90 calendar days before the PPA is expires for re-certification

## State Authorization Procedures

### State Authorization Procedures Policy

Generally, an eligible institution must be located in a state where it has a campus or instructional site in that state. CTK renews their authorization and their approval status with Texas Workforce Commission annually at the end of the year.

### State Authorization Procedures Procedure

- ***Responsibilities:***

- School Director
  - Completes the renewal application annually by February 4th.

# Financial Aid and Finance Office Forms

## Financial Aid and Finance Office Forms Policy

Forms related to Finance office and Financial Aid office are reviewed, revised for the updates each time when third-party servicer and federal mandated make updates. Hard copies of these forms are stored in the institution's Financial Aid Administrative Office in a binder, electronic file folder, and USB Hard Drive. Copies of the past forms are archived in the Financial Aid Administrative office as hard copies in a binder and/or fire safety secured file.

## Financial Aid and Finance Office Forms Procedure

- **Responsibilities:**
  - Director/Financial Aid Officer/ Finance Officer
    - Responsible for reviewing updates and modifying forms as needed
  - Financial Aid Office
    - Responsible for keeping hard copies of former forms as well as current copies of updated forms in a binder in the Financial Aid Administrative office.
  - Finance Office
    - Uploading forms on the computer's FA folder and CTK binder with hard copies.

# Financial Aid Trainings

## Financial Aid Trainings Policy

CTK is committed to ensure that all Financial Aid related personnel are trained in Financial Aid and these personnel are required to attend the mandatory and useful trainings so that they can guide and serve students who are receiving funding. Each person is required to complete the 20-hour online training (Fundamentals), attend the online webinar with Educational Consultant Management and create an account



with ifap.ed.gov to obtain valuable information about GCL, Financial Aid (FA) webinars, FA handbooks and other updates.

## Financial Aid Trainings Procedure

- **Responsibilities:**
  - Financial Aid/ Finance Officer
    - Complete 20 online training within 1 month of the date of hire
    - Obtain access to Ifap.ed.gov within 2 weeks of date of hire
    - Register for FAME online training within 6 months of date of hire
    - Intercept the DCL, review for updates and disclose information to supervisor
  - School Director
    - Monitors, supervises, and plan travel arrangements the training to ensure that training is completed in the time permitted.

## Annual Calendar of Related Activities

### Annual Calendar of Related Activities Policy

All Financial Aide personnel should be required to be updated with date and financial aid activities and trainings. These employees should be provided with the login credential ifap.ed.gov to have access to the Financial Student Aide calendar and related activities.

#### School Holidays

The following holidays will be observed in 12-month academic calendar of CTK, and school will be closed as follows:

President's Day

Memorial Day

Labor Day

Day after Thanksgiving

Juneteenth Day

Independence Day

Thanksgiving Day

Christmas Eve to Day after New Year's Day

**\*\*Additional closures may occur at the school's discretion.**

### **BEREAVEMENT LEAVE**

CTK will allow for time off in the event of death of the following immediate family members:

Spouse

Mother-in-law

Grandchild

Sister

Parent

Grandparent

Father-in-law

Child or Stepchild

Brother

## **Annual Calendar of Related Activities Procedure**

- **Responsibilities:**
  - Financial Aid/Finance Officer
    - Create a log in to ifap.ed.gov
    - Visit the site regularly for updated activities and its content

# Communication of Officials for FSA Funding Purposes

## Communication of Officials for FSA Funding Purposes Policy

CTK finance aid officer should reach out to related departments and the third-party server FAME regarding to ensure that all required documents for enrollment, funding, verification, and eligibility are in files.

## Communication of Officials for FSA Funding Purposes Procedure

- **Responsibilities:**
  - Admission/ Financial Aid / Finance Officer
    - Share important information regarding student funding in a weekly staff meeting
    - Discuss with each student individually regarding requirements, verifications, etc.
    - Update each department regarding in the funding process of each student
    - Documents all appointments for Financial Aid, Enrollment, or finance officer in administrative calendar and share with all departments.
    - Communicates with FAME and the finance officer for funding requirement, eligibility and requirements are maintained.

# Recertification Procedure

## Recertification Procedure Policy

Each school currently certified and participating in FSA programs applies for the recertification before the expiration of Program Participation Agreement (PPA). The Department will notify a school six month prior to the expiration of the school's PPA. The school must complete the application form online and submit it with required documents within a timeline specified by the Department.

## Recertification Procedure

- **Responsibilities:**
  - School Director
    - Complete the PPA no later than 90 days prior its current eligible PPA expires and submit with signed pages and required documents.
    - Once approved submit two signed PPA documents to the Department of Education
    - Once signed by the Department of Education, one signed copy will be returned to the school.
    - Once received a signed copy will be placed into the school files.
    - Ensure that Part 2 Certification is signed and returned by the Third Party Servicer (FAME).

## Institutional and Program Accreditation Approval, or Licensure Information

### Institutional and Program Accreditation Approval, or Licensure Information Policy

It is mandatory for CTK to maintain all current institutional accreditation and approvals and/or licensure information on campus.

### Institutional and Program Accreditation Approval, or Licensure Information Procedure

- **Responsibilities:**
  - School Director
    - Will maintain all current approvals for accreditation agencies, state approvals and licensed information on cite. This information will be secured in a binder or filing cabinet labeled by agency or body. All information will be filed with the most recent information first.

# Protecting Student Information

## Protecting Student Information Policy

CTK considers PII (Personally Indemnifiable Information) as highly confidence. All CTK employees are required to understand the severity of PPI breach. Each student must sign on media permission form regarding personal information. CTK monitors the controls and protects privacy of each student and ensure that system users are trained properly.

## Protecting Student Information Procedure

- ***Responsibilities:***
  - School Director
    - Limit access to only modules needed in the student portal
    - Audit review use of information of students by accessing and monitoring log in reports
    - Identify and authenticate of users by issuing passwords throughout portal system to gain access modules
    - Limit individuals to access certain modules by only allowing access to modules needed
    - Monitor and control interoffice communications by only using student portals for communication,
  - Admission/Financial Aid Officer
    - Have all students sign a media release form accepting or denying photographs and posting photographs.

# Third-Party Servicer Requirements

## Third-Party Servicer Requirements Policy

A third-party servicer, FAME Inc. providing assistance to CTK in the Financial Student Aid (FSA) process. They are considered a consultant in administering the FSA programs.

## Third-Party Servicer Requirements Procedure

- ***Responsibilities:***

- Financial Aid and Finance Department works with FAME to comply with FSA using the procedures below.

Financial Aid Officer /Finance Office Officer / School Director

- Processing student financial aid applications, performing need analysis, and determining student eligibility or related activities;
- Certifying loans, servicing loans, or collecting loans;
- Processing output documents for payment to students, and receiving, disbursing, or delivering FSA funds;
- Conducting required student consumer information services;
- Preparing and certifying requests for cash monitoring or reimbursement funding
- Preparing and submitting notices and applications required for the eligibility and participating schools, or preparing the Fiscal Operations Report and Application to Participate (FISAP); and
- Processing enrollment verification for deferment forms or NSLDS enrollment reporting.

## Third-Party Servicer- PPA

### Third-Party Servicer- PPA Policy

A third-party servicer, FAME Inc. provides assistance to CTK in the Financial Student Aid (FSA) process. CTK and Department of Education requires a signed Part 2 Certification by the FAME and CTK School Director.

## Third-Party Servicer- PPA Procedure

- **Responsibilities:**
  - **School Director**
    - Sign the Program Participation Agreement (PPA)
    - Forward the PPA to Educational Compliance Management for signature
    - Forward the signed PPA to Department of Education with both signatures 90 days prior to the expiration date of the current PPA.

## Requesting Funds from the Third-Party Servicer

### Requesting Funds from the Third-Party Servicer Policy

FAME Inc. assists CTK to collect and disburse Title IV disbursements for students. Disbursements are made at the student's payment period.

### Requesting Funds from the Third-Party Servicer Procedure

- **Responsibilities:**
  - School Director/Instructor
    - Alerts Financial Aid Office that student has reached their payment period based on attendance and Grade Point Average.
    - Sign in sheet is printed along with progress report and is submitted to Financial Aid Officer
  - Financial Aid Officer
    - Places current sign in sheets and progress reports in student's FA file
  - Finance Officer
    - Request FAME for the disbursement of funds
    - Transfer funds to the operating account
    - Notate the disbursement on the student ledger card
    - Notify student in writing of disbursement

# Fiscal Office

## Crediting Student Accounts

### Crediting Student Accounts Policy

CTK gets a service from third-party called Xenegrade to manage the student ledger. Each student has account in Xenegrade portal. CTK credit's student's accounts as cash payments are made and as disbursements are requested. Accounts are updated on the day of payment or disbursement was made and students are able to view their balances using the student's portal as well as obtain a receipt.

### Crediting Student Accounts Procedure

- **Responsibilities:**
  - Finance Officer
    - Create account of each student in Xenegrade
    - Credit's students account to ledger card
    - Prints receipts for students who make cash payments
    - Notifies students of disbursements made to the ledger card
    - Prints an updated ledger card for all disbursements for Financial Aid and Department of Education files.

## Drawing Down Federal Funds

### Drawing Down Federal Funds Policy

CTK and FAME use the G5 delivery system of FSA that supports program award and payment (request payments, adjust drawdowns and refund/return funds). G5 provides financial management support through which school draw down Title IV funds and return excess cash. G5 also provides continuous access to current grant and payment information, such as authorized amounts, cumulative net drawdowns,



refunds, returns, current award balances and payment histories. A school's available balance is the amount of cash available for a school to draw down through G5. The available balance is the difference between the authorized amount and the school's net drawdowns to date. A separate Authorization is maintained for each program by award year.

A school may not request more funds than it needs immediately for disbursements the school has made or will make to eligible students and parents. Therefore, a school must make the disbursements as soon as administratively feasible, but no later than three business days following the date the school receives those funds.

If G5 accepts a school's request for funds, it will make an electronic funds transfer (EFT) of the amount requested to a bank account designated by the school.

A school's authorization is the amount of FSA funds a school is eligible for in the year and program in question. The authorization is called the Current Funding Level (CFL) in the Pell, IAS Grant and ACG/SMART Grant programs, and Cash Control Account (CCA) in the Direct Loan and TEACH Grant programs.

## **Drawing Down Federal Funds Procedures**

- ***Responsibilities***
  - Business Office Administrator
    - Request funds to drawdown from FAME
    - Wait for the drawdown from FAME to be deposited into bank accounts
    - Meet with student to share findings of drawdown
    - Disburse funding to student

# DISBURSEMENT OF FEDERAL FUNDS

## DISBURSEMENT OF FEDERAL FUNDS Policy

The institution must notify a student of the amount of funds the student and his or her parent can expect to receive back from each FSA program, including FWS, and how and when those funds will be disbursed. This notification must be sent before the disbursement is made. If the funds include a Stafford Loan (whether Direct Loan or FFEL), the notice must indicate which funds are from subsidized loans and which are from unsubsidized loans. A school must provide the best information that it has regarding the amount of FSA program funds a student can expect to receive. Because the actual disbursements received by a student may differ slightly from the amount expected by the school (due to loan fees and rounding differences), you may include the gross amount of the loan disbursement or a close approximation of the net disbursement amount. A school must also notify the student or parent in writing (in writing means on paper or electronically) when Perkins, Stafford, or PLUS loan funds are being credited to a student's account. This notification must be sent no earlier than 30 days before and no later than 30 days after crediting the student's account.

The notification must include:

- the date and amount of the disbursement,
- the student's (or parent's) right to cancel all or part of the loan or disbursement, and
- the procedures and the time by which the student (or parent) must notify the school that he or she wishes to cancel the loan or disbursement.

These rules apply to the following programs: Pell Grant, FSEOG, Perkins Loan, Direct Loan, FFEL.

■ Notifications & Authorizations → notification of disbursement → required student/parent authorizations → notification/authorization by electronic means

■ Method of disbursement → credit to student's account (school may hold credit balance if authorized) → disbursement directly to student or parent

■ Disbursement rules → timing of multiple disbursements → FWS students must be paid at least once a month → funds may be disbursed up to 10 days before classes begin (in most cases) → disbursements to 1st-time, 1st-year, Stafford borrowers must be delayed 30 days → requirement to successfully complete coursework in clock-hour and nonterm credit-hour and certain nonstandard term credit-hour programs → school may make unequal FSEOG/Perkins disbursements to meet uneven costs → under certain conditions, late disbursements must be made to students

■ Prompt disbursement rules → usually 3-day timeframe for school to disburse to student/parent after receiving funds → exception: school may delay returning Stafford/PLUS funds to lender in some cases

Note that in the case of FFEL loan funds received from a lender by a means other than EFT payment or master check, the notice to the student or parent need not include information on the right of the student or parent borrower to cancel all or a portion of the loan. This is because a student or parent who receives a disbursement via check has the opportunity to refuse the funds by not endorsing the check or by returning it to the lender.

The school may not use an in-person or telephonic conversation as the sole means of notification because these are not adequate and verifiable methods of providing notice. However, a school may use in person and telephone notices in addition to those provided in writing.

If the student or parent borrower wishes to cancel all or a portion of a loan, he or she must inform the school. The school must honor a request if it receives the request before the start of the payment period, or if it receives the request within 14 days after it sent the notice to the borrower. If the school receives a student's or parent's request for cancellation after these dates, the school may, but is not required to, honor the request. Regardless of when the request is received, the school must inform the student or parent of the outcome of the request.

When acting upon a loan cancellation request, your school must return the loan proceeds and/or cancel the loan as appropriate. A school is not responsible for returning any portion of a loan that was disbursed to a student or parent directly before the request for cancellation was received. However, you are encouraged to take an active role in advising the borrower to return the funds already received.

Before the school can perform any of the following activities, you must obtain authorization from a student (or parent borrower):

- Disburse FSA funds (including FWS wages) by EFT to a bank account designated by the student or parent.
- Use FSA funds (including FWS) to pay for allowable charges other than tuition, fees, and room and board if the student contracts with the school.
- Hold an FSA credit balance.
- Apply FSA funds to minor prior-year charges.

A school may not require or coerce the student or parent to provide the authorization and must clearly explain to the student or parent how to cancel or modify the authorization. The student or parent may cancel or modify the authorization at any time.

A cancellation or modification is not retroactive—it takes effect on the date that the school receives it from the student or parent. If a student or parent cancels an authorization to use FSA program funds. If you are notifying the student of the next disbursement by electronic mail or other electronic means, you are encouraged to follow up on any electronic notice for which you receive an “undeliverable” message. Anytime a school returns an FFEL disbursement or any portion of an FFEL disbursement to a lender, the origination fee and insurance premium are reduced in proportion to the amount returned. If a student returns the full amount of a loan within 120 days of disbursement, the loan is cancelled and the origination fee and insurance premium are eliminated.

If a student borrower not in repayment returns an FFEL disbursement or any portion of an FFEL disbursement to the lender within 120 days after disbursement, the origination fee and insurance premium are reduced in proportion to the amount returned.

## **DISBURSEMENT OF FEDERAL FUNDS PROCEDURES**

### ▪ ***Responsibilities***

- Finance Officer
  - Notify the student and/or parent in writing in advance the amount and date the funds will be received
  - Notify student or parent of the amount of funds awarded
  - Inform student or parent they have the right to cancel all or part of funding received

- Must get authorization to disburse funds from student or parent
- Set up a conference to receive funds

## Fiscal Recordkeeping Process

### Fiscal Recordkeeping Process Policy

CTK must keep comprehensive, accurate program and fiscal records related to its use of Federal Student Aid (FSA) program funds. Program and fiscal records must demonstrate that school can meet the administrative and fiscal requirements for participating in the FSA programs. In addition, records must demonstrate proper administration of FSA program funds and must show a clear audit trail for FSA program expenditures. For example, records for each FSA recipient must clearly show that the student was eligible to receive the funds and the funds were disbursed in compliance with program regulations. In addition to the general institutional record keeping requirements discussed here, a school must also comply with all program-specific record keeping requirements stated in the individual FSA regulations.

### Minimum Record Retention Periods

#### RECORD MAINTENANCE - Acceptable formats

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

- hard copy
- CD-ROM
- computer file
- other media formats

All other record information, regardless of the format used, must be retrievable in a coherent hard copy format (for example, an easily understandable printout of a computer file) or in a media format acceptable to the Department. The requirement providing for other media formats acceptable to the Department allows for the use of new technology as it is developed. The Department will notify schools of acceptable media formats; schools should not apply for approval of a media format.

Minimum Record Retention Periods of FSA approximately 3 years.

Loans are retained UNTIL End of the award year in which the student last attended.

The loan is satisfied or the documents are needed to enforce the obligation

The date on which a loan is assigned to the Department, cancelled, or repaid

End of the award year for which the aid was awarded

End of the award year in which the report was submitted

Any document that contains a signature, seal, certification, or any other image or mark required to validate the authenticity of its information must be maintained in its original hard copy or in an imaged media format. This includes tax returns, verification statements, and Student Aid Reports (SARs) used to determine eligibility, and any other document when a signature seal, etc., contained on it is necessary for the document to be used for the purposes for which it is being retained.

A school may maintain a record in an imaged media format only if the format is capable of reproducing an accurate, legible, and complete copy of the original document. When printed, the copy must be approximately the same size as the original document.

Please note that promissory notes that are signed electronically, must be maintained electronically in accordance with the requirements of 34 CFR 668.24(d)(3)(i) through (iv).

## **Fiscal Recordkeeping Process Procedure**

- ***Responsibilities:***
  - Financial Aid Officer
    - School Director
    - Satisfactory Academic Progress (SAP) documentation
    - Admission enrollment documentation
    - Enrollment status
    - Certification statements
    - Verifying application data resolving conflicting information
    - Professional Judgment decisions
    - Financial Aid history information for transfer students
  - School Director
    - State agency reports

- Audits and program review reports
  - Self-evaluation reports
- , Business Officer Administrator
  - Pell grant statements
  - Can request quarterly statements monthly reports from G5
  - Reconciliation reports
  - State grand and scholarship award rosters and reports
- School Director
  - Program participation agreement, approval letter, and Eligibility and Certification Approval Report (ECAR)
- RGM System
  - Third Party Service Provider will retain all student information and financial record as per the service agreement

## Fiscal Reporting Process

### Fiscal Reporting Process Policy

CTK is required to submit audited financial records by a CPA with the GAAP credentials, Department of Education (DOE), and COE annually. The audited financials' outcome must fall within the guidelines of the DOE and the COE's regulations to remain in good standing with both agencies.

### Fiscal Reporting Process Procedure

- ***Responsibilities:***
  - **Director**
    - Contact the CPA on September 1st to request documents needed to complete the audit
    - Submit documents no later than 30 days
    - Submit final audited Financials to Department of Education (DOE) no later than December 31<sup>st</sup>

- Make corrections that may be needed by DOE
- Make final submission by December 31<sup>st</sup>
- Finance officer
  - Prepare monthly records
  - Communicate with auditing companies to keep books in compliance.

## and Annual Reconciliation

### Monthly and Annual Reconciliation Policy

CTK reconciles all monthly and annual cash and monthly disbursed funds to the finance office records, ledger cards and banks statements.

FAME draws Federal funds from G5 and deposits to Institute’s Federal Fund checking account with BB&T Bank. Refund checks are issued to students by the Institute for bank withdrawal. Similarly, the money due to the Institute are withdrawn by checks from BB&T Bank account and deposited to Institute’s operating bank account. FAME reconciles the money drawn from G5 and BB&T Bank Federal Fund account on a monthly and annual basis. Finance officer update Xenegrade account of each student after each disbursement and withdraw from the BB&T federal account.

Xenegrade provides all financial data to Institute’s financial audit firm as year end Close Out Package.

### Monthly and Annual Reconciliation Procedure

- **Responsibilities:**
  - Financial Aid /Finance Officer
    - Determines the amount disbursed each month according to the Financial Aid Officer records.
    - Work with FAME on G5 withdraw requests and actual disbursements



- Finance Officer
  - Determines the amounts disbursed and cash collected each month according to the business office records, ledger, bank statements
  - Enter the disbursed
- School Director
  - Keep a check on deposits from G5 to BB&T Bank Federal Fund account every week
  - Make sure the funds are distributed to the right student as per G5 postings
  - Send monthly bank statement to FAME for reconciliation
  - Review the year-end financial statements from FAME
  - Forward Close Out Package from FAME to Institute's CPA for annual financial and compliance audits.

## Procedures for Handling Overpayments

### Procedures for Handling Overpayments Policy

An overpayment exists when a student's aid package exceeds his or her need. While CTK must always take care not to overpay a student when packaging his or her aid, circumstances may change after a student has been packaged and the student's aid that result in an overpayment.

### Procedures for Handling Overpayments Procedure

- **Responsibilities:**
  - Finance Officer
    - Apply the student's ledger card with the disbursement amount
    - Xenegrade system update this information
    - Alert the Financial Aid Officer of the overpayment due to the student confirming the amount
    - Notify the student of the disbursement and the overpayment within 14 days of the disbursement

- Issue the overpayment to the student, apply it to the ledger card.
- Make a copy of the ledger card for the Financial Aid File and Education Department file
- Financial Aid Administrator
  - Place copy of student ledger in the Financial Aid file

## Excess Cash

### Excess Cash Policy

A school must disburse requested funds no later than three business days following the date the school receives the funds. “Excess cash” is any amount of SFA Program funds, other than funds received under the just-in-time payment method that a school does not disburse to students by the end of the third business day. Excess cash must be returned to the Department immediately. However, sometimes a school is prevented from disbursing funds in the required three days because of circumstances outside the school’s control. For example, a school may not have been able to disburse funds because of a change in a student’s enrollment status, a student’s failure to attend classes as scheduled, or a change in a student’s award as a result of verification. To take these circumstances into account, under the following circumstances, a school may maintain an excess cash balance for up to seven additional days.

For a period of peak enrollment (see below) during which a drawdown of excess cash occurs, the school can maintain the excess cash balance in its federal account if the excess cash balance is less than 3% of the school’s total prior-year drawdowns. The school is required to eliminate the excess cash balance within the next seven days by disbursing SFA Program funds to students for at least the amount of that excess cash balance.

A period of peak enrollment at a school occurs when at least 25% of the school’s students start classes during a given 30-day period.

A school determines this percentage for an award year with the following fraction:

-Number of students who started classes in the comparable 30-day period in the prior award year Total number of students who started classes during the entire prior award year.

-For any period other than a period of peak enrollment, the school can maintain the excess cash balance if the excess cash balance is less than 1% of the school's prior-year drawdowns. In this case also, the school is required to eliminate the excess cash balance within the next seven days by disbursing SFA Program funds to students for at least the amount of that balance.

-If a school that is participating in the Direct Loan Program does not have prior-year drawdown data for the Direct Loan Program because it did not participate in the Direct Loan Program for that prior award year, the school may include the total amount of loans guaranteed under the FFEL Program for students attending the school during that year in determining total prior-year drawdowns.

-The Department reviews schools to determine where excess cash balances have been improperly maintained and to seek recovery from those schools of the resulting losses to the government.

Upon a finding that a school has maintained an excess cash balance in excess of allowable tolerances, a school is required to reimburse the Department for the costs that the government incurred in making those excess funds available to the school. In addition, where excess cash balances are disproportionately large to the size of the school or represent a continuing problem with the school's responsibility to administer efficiently the SFA Programs, the Department may initiate a proceeding to fine, limit, suspend, or terminate the school's participation in one or more of the SFA Programs. (For more on fines and other actions against schools, see Chapter 11 in FSA Handbook)

Generally, a check is "issued" when the school releases, distributes, or makes available the check by mailing the check to the student or parent (if applicable), or by notifying the student or parent expeditiously that the check is available for immediate pickup. However, upon a finding that a school has maintained excess cash balances, the Department considers the school to have issued a check on the date that check cleared the school's bank account, unless the school

demonstrates to the satisfaction of the Department that it issued the check to the student shortly after the school wrote that check.

Finally, the Department will assess a school that maintains excess cash balances a liability that is equal to the difference between the earnings those cash balances would have yielded under a Treasury derived rate and the actual interest earned on those cash balances.

## **Excess Cash Procedures**

### **• *Responsibilities***

- Finance Officer
  - FAME cash handling process (in G5) ensures no excess cash disbursement
  - Disburse FSA funds to students
  - Monitors Excess Cash in accounts, if any
  - Return excess cash to the State Department of Education immediately after third day of school receiving funds.
  - May keep fund beyond the third day if there is an extenuating circumstance (7 days)

## **1098-T, 1098-E, IRS Forms 1042 & 1042-s Requirements**

### **1098-T, 1098-E, IRS Forms 1042 & 1042-s Requirements Policy**

#### ***IRS Form 1098-E***

CTK must provide IRS Form 1098-E, Student Interest Statement, to all individuals who paid student loan interest of \$600 or more on loans held by your school during a calendar year.

### ***IRS Form 1098-T***

CTK must provide Form 1098-T, Tuition Statement, for each student enrolled for credit and for each student whom a reportable transaction is made.

### ***IRS Forms 1042 & 1042-s***

CTK is required to meet withholding and reporting requirements for nonresidents. Nonresidents eligible for Title IV aid include asylees, refugees, and parolees. CTK Institute must generate a 1042-S for each nonresident student receiving taxable income other than wages. This includes Title IV need based aid and other grants or scholarships. CTK must also prepare a 1042 summarizing the data reported on the individual 1042-S forms. See IRS instructions for forms 1042 and 1042-S for filing requirements

## **1098-T, 1098-E, IRS Forms 1042 & 1042-s Requirements Procedure**

- ***Responsibilities:***
  - **Business Office Administrator**
    - Contact IRS to order 1098-T and 1042 forms by January 1<sup>st</sup> of each year or as soon as they are available for purchase.
    - Complete all 1098-E forms for all students who paid student interest in excess of \$600.00 or more.
    - Complete 1098-T Tuition statement for each student enrolled for credit and for each student whom a reportable transaction was made.
    - Make copies of all forms for student's files
    - Mail all files to students no later than January 30<sup>th</sup> each year.
    - In the event of unforeseen circumstances, request for an extension
    - CPA generates 1098-T forms for students