

Tuition Assistance Program

Effective Date: 01/01/2024

Purpose

We encourage employees at all levels and in all job categories to engage in learning and development opportunities, whether the goal is to enhance performance in their current position or prepare them for a new role within the Mass General Brigham organization.

This policy constitutes the written plan document outlining the terms of the Mass General Brigham Tuition Assistance Program (the “Program”). The Program provides reimbursement of eligible expenses (“Eligible Expenses”) to eligible employees (“Eligible Employees”) for approved educational and professional development opportunities outside of Mass General Brigham (each, an “Eligible Course”). This Program does not cover expenses for the dependents of employees.

It is intended that benefits paid under the Program will not be subject to federal income tax pursuant to Internal Revenue Code (“Code”) Section 127. However, Mass General Brigham makes no guarantees regarding the tax treatment of benefits provided under the Program, and employees are encouraged to speak with their individual tax advisers if they have any questions in this regard.

Scope

This written plan document details who qualifies as an Eligible Employee, what qualifies as an Eligible Course, what constitutes an Eligible Expense, and the administrative requirements Eligible Employees must satisfy to receive benefits under the Program. Financial assistance is only provided to Eligible Employees who complete Eligible Courses and is only approved at the individual course level and not at the overall program or degree level. Educational assistance is provided for and dependent upon the successful completion of certain types of courses, including degree courses, non-degree courses, and industry-specific certifications, as described in more detail below. Employees are encouraged to review this written plan document and discuss the course of study with their manager before initiating the application process.

Some educational expenses are not covered by this Program and are the Program participant's responsibility.

This Program will be provided net of other financial assistance. The maximum amount eligible for reimbursement for any Eligible Course will be reduced by any financial aid received by the Eligible Employee, such as scholarships, grants, or V.A. benefits. If the participant receives more than \$5,250 in tax-free benefits in a calendar year, the participant is responsible for seeking tax advice and any taxes owed are their responsibility.

Employee Eligibility

Eligible Employee: An employee of any Mass General Brigham organization is an Eligible Employee under the Program if the employee satisfies the following requirements:

- The employee is a full-time employee regularly scheduled to work a minimum of 36 hours per week (a “Full-Time Eligible Employee”*) or a part-time employee regularly scheduled to work 20-35.9 hours per week (a “Part-Time Eligible Employee”);

- The employee has completed at least three months of continuous employment at any Mass General Brigham organization(s) (the “Waiting Period”); and
- The employee’s manager has approved the employee’s course of study by confirming the course of study is directly related to the employee’s position or will assist the employee in transitioning to a new role within Mass General Brigham.

*Physicians, faculty and Investigators who are designated by their department as .50 FTE or greater are eligible for \$5,250. Those less than .50 FTE are not eligible for the Program.

Rehires: If an employee terminates employment at a Mass General Brigham organization and is rehired *within* 12 months, then prior service will be bridged, and the employee will be credited with past service for purposes of determining whether the Waiting Period has been satisfied. If an employee is rehired after 12 months, prior service will not count towards the Waiting Period.

Employment Status: Employees must continue in an eligible status for the approved Eligible Course of study to receive reimbursement of Eligible Expenses. Whether the employee is a Full-Time Eligible Employee or a Part-Time Eligible Employee at the time of Eligible Course completion will determine eligibility for the Program, including the amount of reimbursement the Program provides. In the event an individual’s employment status changes while completing a course, the individual’s employment status upon course completion will determine eligibility. If an individual’s employment with Mass General Brigham terminates for any reason, either voluntarily or involuntarily, the individual will automatically cease to participate in the Program on the effective date of termination of employment and will be solely responsible for all costs that have not been submitted for reimbursement before their date of termination. However, eligible expenses submitted before the date of termination are eligible for reimbursement, even if the date of reimbursement occurs after the termination of employment.

Leaves of Absences: Employees in an active paid status, who are on a paid leave of absence (intermittent or continuous), are eligible for reimbursement, assuming at course completion they are in an active status. If an employee is on unpaid leave or receiving benefits under Mass General Brigham's Long Term Disability Plan, they are not eligible for the Program until they return to an active, paid status.

Employees Represented by Unions and/or Covered by Collective Bargaining Agreements: Union-represented employees are not Eligible Employees unless applicable collective bargaining agreements and/or past practices provide for Program eligibility.

Eligible Courses and Eligible Expenses

Eligible Course of Study: Eligible Courses include in-person or online programs and must be completed through an accredited educational provider as described below. The course of study must assist the employee in their current role or assist the employee in transitioning to a new role within Mass General Brigham. The following bullets are a list of eligible courses of study:

- Basic Education
 - All coursework and testing required for the completion of a high school diploma or a Graduate Equivalency Degree (GED)/Diploma
 - College-Level Examination Program (CLEP) exam programs

- English for Speakers of Other Languages (ESOL) courses
- Degree Programs
 - Associate Degree, Bachelor’s Degree, Master’s Degree, and Doctoral Degree
 - This includes courses that are not job-related but are part of the degree program. Pre-requisite courses that are not job-related are eligible for reimbursement if the student is required to take the course for admission to such a degree program.
- Certificate Programs
- Individual Courses
- Licensure and Certification/Recertification
 - Reimbursement for courses and exams only and not for the fees required to obtain or renew the license/certification itself
- Continuing Education Units (CEU) and Continuing Medical Education (CME) to meet licensure or professional certification requirements, up to the CEU/CME annual maximum reimbursement amount.

Approval must be obtained separately for each course to be considered an Eligible Course. Approval of a course for one Eligible Employee does not guarantee that the same course or a similar course will be approved as an Eligible Course for any other Eligible Employee. The knowledge or skills to be acquired through an Eligible Course of study must directly impact the position currently held by the Eligible Employee or assist the Eligible Employee in transitioning to a new position within the Mass General Brigham organization.

Completion of a course, degree, or certification does not entitle an Eligible Employee to any pay increase, promotion, transfer or other change or enhancement in job duties. As such, completion of a course, degree, or certification that constitutes an Eligible Course does not obligate Mass General Brigham to make any change to an individual’s employment arrangement.

Accreditation of Educational Providers for eligible courses of study

- **Degree programs, certificate programs, and individual courses:** Must be completed at an accredited education institution (e.g., college, university, technical school). Accreditation information can be obtained from the school or the Council of Higher Education Accreditation (CHEA) at its website: www.chea.org, or from the US Department of Education, at its website: <https://www.ed.gov/accreditation>.
- **Licensure and certification:** Must be provided by an accredited educational institution (e.g., college, university, technical school) or an organization that has met the standards of the credentialing organization and is authorized to grant certification or licensure.
- **CEU and CME courses:** Must be completed through a provider accredited by an overseeing agency such as the Accreditation Council for Continuing Medical Education (ACCME).

Courses/Programs Not Eligible for Reimbursement: Any course that is not approved by both the employee’s manager and the plan administrator designated by Mass General Brigham (the “Educational Program Administrator”) because the manager or Educational Program Administrator determines that (i) the course is

not job-related and does not prepare the employee for another position within Mass General Brigham, or (ii) the course does not otherwise fall within the definition of “Eligible Course” or “Eligible Expenses” as outlined within this policy.

Eligible Expenses: Eligible Expenses include the following costs, to the extent the Educational Program Administrator determines that the expenses qualify as Eligible Expenses under this Program:

- Tuition for courses (see above for additional detail)
- Required course materials (e.g., books, e-books, and book rental fees)
- Fees required to participate in the course
- Application fees
- Exam fees
- Prep courses for entrance exams
- Certification and licensure prep courses for an eligible exam
- Laboratory fees
- Registration fees
- Technology fees
- Dissertation fees
- Course activity fees
- Fees that the Educational Program Administrator determines at its discretion are surrogates for tuition.

All other fees and expenses are not eligible for reimbursement under this Program. Expenses that are not Eligible Expenses include, but are not limited to, the following:

- Parking
- Meals
- Lodging
- Late fees
- Shipping fees
- Health center/recreation fees
- Health insurance
- Transportation
- Computers and printers
- Supplies (paper, backpacks, etc.)
- Community service program fees
- Student services fees
- Student identification fees
- Application for grants or scholarship fees
- Payment plan fees
- Uniforms
- Audited Courses – courses for which no academic credit or grade is received.

Maximum Annual Reimbursement Amount (excluding CEUs and CMEs): The maximum amount of annual reimbursement of Eligible Expenses available under the Program is based on the employee’s employment status upon completion of an Eligible Course:

- Up to \$5,250 for a Full-Time Eligible Employee* and
- Up to \$2,625 for a Part-Time Eligible Employee.

*Physicians, faculty, and investigators designated by their department as .50 FTE or greater are eligible for \$5,250. Those less than .50 FTE are not eligible for the Program.

Reimbursement Amounts for Continuing Education Units (CEU) and Continuing Medical Education (CME): Employees may be reimbursed for Continuing Education Units (CEU) and Continuing Medical Education (CME) up to an annual maximum of up to \$1,500 for a Full-Time Eligible Employee and \$750 for a Part-Time Eligible Employee. Reimbursement for CEUs and CMEs will count toward the employee's total Maximum Annual Reimbursement Amount.

Important: Due to federal regulations, the Maximum Annual Reimbursement Amount for each calendar year is based on the year in which the payment is made (e.g., if a course begins in one calendar year and ends in the following calendar year, the reimbursement will count towards the maximum annual value **for the calendar year in which the payment is made**; OR if the reimbursement request for a course that is completed in one year is not received in time to be paid to the employee by December 31 of that year, it must be applied toward the following years allotment). **Employees should work with instructors to obtain the required grades to allow for submission by December 1 to ensure payment in the calendar year the course occurred.**

Applying for and Receiving Program Benefits

Application Process: Two levels of approval are required before a course will be considered eligible under the Program: (1) approval from the employee's manager and (2) approval from the Educational Program Administrator.

- To receive course approval, an Eligible Employee must first complete an application that will be routed to their manager for approval. Applications must be submitted within 60 days of the course end date. **However, it is strongly recommended that applications be submitted at least two weeks before the start of the course to verify course eligibility.** If you do not receive approval for a course before it begins and your application is later denied, you will be responsible for all expenses.

The application must include the name of the course, a description of the course, and an estimated cost (including the cost of any related Eligible Expenses such as lab fees and books). If the employee's manager approves the course, the application will be routed to the Educational Program Administrator for final review and approval. Approval from both the manager and the Educational Program Administrator is required; approval from your manager is not sufficient.

- If the Educational Program Administrator approves the course, the Educational Program Administrator will provide a written statement noting the course's approval as an Eligible Course, the reimbursable eligible expenses, and the maximum amount of reimbursement the Program will provide for the Eligible Course.
- Until an employee has received a written course approval from the employee's manager and the Educational Program Administrator, an applying employee should consider a course unapproved, regardless of any discussions that the employee may have had with any representative of Mass General Brigham or the Educational Program Administrator regarding the course.

Reimbursement Eligibility: Reimbursement requests will be reviewed once the Eligible Course is completed and supporting documentation is received by the Educational Program Administrator.

- Reimbursement requests must be submitted within 90 days of the course ending.
- Employees eligible for financial support/reimbursement from their department (or through any other Mass General Brigham policy/program) for expenses that are also eligible under the Program (e.g., Continuing Medical Education (CME) expenses) and employees receiving grants, scholarships and/or Veteran’s administration benefits may wish to utilize these funding sources before requesting funds through this Program. All financial assistance must be disclosed on the application when used concurrently with this Program.
- For reimbursement under the Program to be paid during the current calendar year, proof of a passing grade and documents substantiating that a participating employee incurred and paid the educational expenses must be submitted to the Educational Program Administrator by **December 1**. A deferred payment agreement provided by your educational institution will be accepted as proof of payment.
- A passing grade is considered a minimum grade of "C" or better (for credit courses), a "P" for pass/fail courses, and "proof of certification" for certification courses.

Appeals: If an employee is not satisfied with a decision made, the employee may file an appeal with the Educational Program Administrator. Once the review is completed, the employee will be notified of the decision. All appeal decisions are final.

Taxation: Taxation of employer-sponsored tuition assistance is governed by the Code Section 127, which exempts from taxation tuition assistance payments up to the maximum of \$5,250 per employee per calendar year. The tax treatment of any payment under the Program will be determined as of the date payment is processed through payroll and in accordance with applicable Federal, state, and local employment tax standards. Consultation with a tax advisor is recommended for additional information.

If a participant receives benefits under this program and any other Section 127 plan that combine to exceed \$5,250, the participant is responsible for any taxes owed.

Other Sources of Financial Assistance

Program participants are encouraged to seek additional resources for financial aid to supplement the Program, including aid provided by their department, if available. Visit www.askmyphrportal.com to see other education-related programs, including discounts, grants, and scholarships that may offer additional financial assistance. See the article on Discounts and University Programs.

To the extent you are eligible for these programs, consider pursuing professional development programming provided by several Mass General Brigham entities (including but not limited to):

- [MGH Institute of Health Professions Continuing Professional Development](#)
- [MGB Continuing Professional Development](#)
- [Spaulding Rehabilitation Division of Education and Training Course Catalog](#)

- MedBridge Education CEU Subscriptions

Employees of Mass General Brigham may be eligible for Public Student Loan Forgiveness. For more information on Public Student Loan Forgiveness and assistance with applying, please visit www.askmyhrportal.com and search KB0015942.

Mass General Brigham offers additional educational assistance opportunities. See www.askmyhrportal.com for more information on Work Force Development courses/learning opportunities.

General Provisions and Links

The current Educational Program Administrator is Tuition.io. You can contact the Educational Program Administrator by going to tuition.io.com or by calling 1-855-353-0395.

The Program operates on a calendar-year basis.

Employees are not required or permitted to contribute to the Program. All costs and benefits associated with the Program are to be paid by the general assets of Mass General Brigham and its organizations. The Program is not intended to be subject to the Employee Retirement Income Security Act of 1974.

The Educational Program Administrator will determine, in its sole discretion, whether tuition and required fees covered by the Program will be paid directly to the educational institution, or the Eligible Employee.

It is expected that Eligible Courses for which benefits are provided under the Program to current employees are to be completed outside an employee's regular work hours (and not during the time for which the employee is being paid by Mass General Brigham and its organizations) and that attending such courses will not interfere with an employee's work for Mass General Brigham and its organizations. Employees who wish to modify their schedules to accommodate their coursework should contact their manager. Application approval does not relieve an employee from regular or emergency duties. This means that, if necessary, an employee may be required to miss class if requested by the employee's manager.

Mass General Brigham has delegated to the Educational Program Administrator sole discretionary authority to interpret the Program, to make eligibility and benefit determinations, and to make factual determinations in connection with the Program. The Educational Program Administrator also has sole discretionary authority to approve or deny any request for reimbursement, and no individual has a guaranteed right to any future reimbursement, even if the individual has received one or more reimbursements in the past. Mass General Brigham reserves the right to eliminate the Educational Program Administrator's authority under the Program and to delegate in writing any authority under the Program to any other person or entity. Any interpretations, determinations and decisions made by Mass General Brigham or its delegates with respect to any questions or other matters arising under the Program are final, conclusive and binding.

If the Educational Program Administrator determines, in its sole discretion, that the Program has made an overpayment to any individual, the Educational Program Administrator may recover the amount of the overpayment by requiring the payee to return the excess payments, reducing any future payments to the payee, or any other method deemed reasonable by the Educational Program Administrator. If an individual receives benefits under the Program and fails to notify the Educational Program Administrator of any financial aid that would have reduced the benefits paid from the Program, the individual must also return any excess

payments to Mass General Brigham. Any excess payment that is not returned will be subject to the Educational Program Administrator's right to recover overpayments.

Mass General Brigham may amend or revoke the Program at any time, with or without notice. Further, the Educational Program Administrator may modify the provisions of the Program in certain circumstances as deemed appropriate to meet the needs of Mass General Brigham. If Mass General Brigham amends or terminates the Program, any Eligible Employee enrolled in a course that has been previously approved will remain eligible to be reimbursed according to the Program with respect to the course.

The receipt of benefits under the Program does not give any person any right to continued employment with Mass General Brigham. The right and power of Mass General Brigham to dismiss or discharge any employee is expressly reserved.

This Program is to be construed, administered, and governed by the laws of the state of Massachusetts to the extent not superseded by the Internal Revenue Code or other federal law.

This written plan document supersedes all previous policies issued related to the Program.

For more information, visit www.AskMyHRportal.com or contact the Human Resources Support Center at 1-833-AskMyHR (1-833-275-6947).

Approval Authority

Vice President, Employee Benefits

Effective date: 01/01/2024

Revised: 5/20/2024