

OPERATIONAL PROCEDURE MANUAL

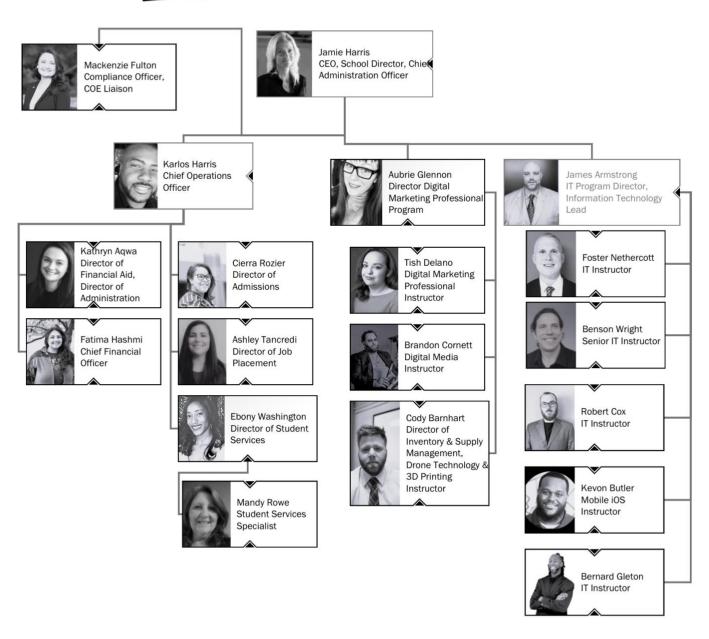
2022-2023

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SECTION ONE

PERSONNEL

DSDT



Organizational Chart

INSTRUCTIONAL/ ADMINISTRATIVE & SUPERVISORY STAFF

Name	Title	Email
Ashley Tancredi	Director of Job Placement	ashley@dsdt.tech
Aubrie Glennon	Director Digital Marketing Professional Program	aubrie.glennon@dsdt.edu
Benson Wright	Senior IT Instructor	benson@dsdt.edu
Bernard Gleton	IT Instructor	bernard.gleton@dsdt.edu
Brandon Cornett	Digital Media Instructor	brandon@dsdt.tech
Cierra Rozier	Director of Admissions	cierra@dsdt.tech
Cody Barnhart	Director of Inventory Supply & Management, Drone Technology & 3D Printing Instructor	cody@dsdt.edu
Ebony Washington	Director of Student Services	ebony.washington@dsdt.tech
Fatima Hashmi	CFO	fatima@dsdt.tech
Foster Nethercott	IT Instructor	foster.n@dsdt.edu
James Armstrong	Chief Technology Officer, IT Program Director, Information Technology Lead	james.a@dsdt.edu
Jamie Harris	School Director and CEO, Chief Administration Officer	jamie@dsdt.tech
Karlos Harris	COO	karlos@dsdt.tech
Kathryn Aqwa	Director of Administration, Director of Financial Aid	katie@dsdt.tech
Kevon Butler	Mobile IOS Instructor	kevon.butler@dsdt.edu
Mackenzie Fulton	Compliance Officer, COE Liaison	mackenzie@dsdt.tech
Mandy Rowe	Student Services Specialist	mandy.rowe@dsdt.tech
Robert Cox	IT Instructor	robert.cox@dsdt.edu
Tish Delano	Digital Marketing Professional Instructor	tish.delano@dsdt.edu

JOB DESCRIPTIONS

Admissions Representative

Job Summary

Oversees all aspects of student recruitment.

General Accountabilities

- Develops and implements introduction of DSDT to prospective students
- Develops and implements all admissions goals and strategies.
- Markets and promotes the institution to the external community.
- Ensures each class is filled with the appropriate number of qualified students.
- Works closely with the institution's leadership.
- Assesses a student's Financial Aid needs and directs them to the Financial Aid Department.
- Develops marketing campaigns that relay the institution's mission to prospective students.
- Works closely with the head of each educational department, as well as the financial aid team.
- Develops a robust understanding of our recruiting software platforms and uses them to report and maintain leads
- Ensures the admissions process runs smoothly, (basic computer skills/ Microsoft office).
- Advises students with consumer information, scheduling, and course enrollment.
- Problem solver with the ability to provide conflict resolution.
- Leadership skills

Job Qualifications

- Minimum Education: High School Diploma or Associates Degree
- Minimum Experience: 2-3 years of related experience
- Preferred Education: Bachelor's degree
- Preferred Experience: 5-10 years of related experience

- Exceptional verbal and written communication
- Service oriented
- Presentation
- Leadership
- Problem solver

^{*}DSDT reserves the right to add or change duties at any time.

Director of Administration

Job Summary

Oversees all file and record keeping and is responsible for long-term strategic planning, overseeing daily administrative operations and delegating tasks to staff and faculty.

General Accountabilities

- Manages and oversees all administrative areas of the institution.
- Develops, implements, and monitors administrative department policies and procedures.
- Actively participates in institution planning, development, and team building.
- Manages and trains staff and faculty on campus cafe.
- Collaborates with all management staff to identify and deliver the required administrative support operations for the organization.
- Manages all student files and maintains proper privacy data protocol.
- Always ensures compliance with federal and state accreditation laws, standards, and regulations.
- Requests and analyzes audits of safe filing and record keeping
- Streamlines software systems and manages the implementation
- Coordinates and manages daily functional administrative tasks
- Makes recommendations for hiring, managing, training and firing administrative personnel
- Monitors and makes recommendations for annual budget

Job Qualifications

- Education: Bachelor's degree in education or related field.
- Experience: 3-5 years of related experience.

- Excellent written and oral communication/collaboration skills
- Organizational skills/ service orientation
- Leadership
- Professionalism
- Time management

^{*}DSDT reserves the right to add or change duties at any time

Director of Admissions

Job Summary

Provides vision, leadership, and strategic direction for all admissions and enrollment activities while managing the day-to-day operations of the department.

General Accountabilities

- Manages and oversees functional areas of the institution
- Trains, plans, and implements software-based platforms for admissions and enrollments
- Plans, coordinates, and executes incoming students' registration, testing, and orientation
- Develops, implements, and monitors departmental policies and procedures
- Actively participates in institution planning, development, and team building
- Monitor's student retention and placement data
- Assists others in daily tasks associated with campus cafe
- Monitors all student files and maintains proper privacy data protocol
- Monitor's student satisfaction and coordinates problem resolution with the Student Success Director
- Always ensures compliance with federal and state accreditation laws, standards, and regulations
- Develops and manages admissions department budgets and prepares reports.
- Works with the Director of Financial Aid to ensure all documents are complete and stored with the appropriate data privacy
- Assists students in enrollment for classes on-campus cafe and document management procedures
- Performs other related duties as assigned by management

*DSDT reserves the right to add or change duties at any time

Job Qualifications

- Education: Bachelor's degree in education or related field
- Experience: 3-5 years of related experience

- Excellent written and oral communication/collaboration skills
- Organizational skills/ service orientation
- Learning oriented
- Time management

Director of Inventory and Supply Management

Job Summary

Manages and evaluates inventory management systems, maintains equipment and software procedures and best practices, and oversees daily inventory operations.

General Accountabilities

- Manages and oversees all areas of inventory equipment and software
- Develops, implements, and monitors departmental policies and procedures.
- Designs, implements and manages an inventory tracking system for optimized inventory control procedures
- Examine supplies, equipment and materials to determine shortages
- Create detailed reports for adjustments, inventory operations and equipment needs
- Evaluates and ensures proper implementation of new inventory into already established inventory control procedures
- Research and analyze various equipment and suppliers to ensure cost and efficiency
- Train staff and faculty in maintaining proper inventory management and procedures
- Actively participates in institution planning, development, and team building.
- Assists others in daily tasks associated with Asset Tiger
- Evaluates and regularly audits inventory procedures

Job Qualifications

- Education: Bachelor's degree in education or related field.
- Experience: 3-5 years of related experience.

- Excellent written and oral communication/collaboration skills
- Organizational skills
- Leadership
- Creativity
- Critical Thinking
- Problem Solving Skills

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Director of Financial Aid

Job Summary

Provides guidance to prospective loan applicants.

General Accountabilities

- Facilitate and implement policies and procedures of DSDT
- Facilitate day-to-day operations of the school facility
- Support instructors and conduct instructor meetings
- Evaluate instructors and employees
- Monitor SAP and Counsel students on Academics and Attendance
- Instruct students when needed
- Hire and conduct training for new hire orientation
- Implement and make sure Financial Aid Program is following federal guidelines
- Communicates with Boston Educational Network, auditors, Financial Aid Administrator, and Business Office
- Maintains thorough knowledge of changes to financial aid programs to ensure compliance with federal and state regulations as well as institutional policies
- Coordinates preparation for accreditation visits, student financial aid audits, and other reviews/audits
- Provides required reports in a timely and accurate manner

Job Qualifications

- Education: Bachelor's degree in business administration or a related field (preferred)
- Experience: 3-5 years of related experience

- Excellent written and oral communication
- Organizational skills
- Time management
- Technical capacity
- Service orientation
- Presentation skills

^{*}DSDT reserves the right to add or change duties at any time

Program Director/Lead Instructor

Job Summary

Responsible for researching, planning, developing and implementing a specific program with desirable student learning outcomes as the ultimate objective.

General Accountabilities

- Works to foster professional growth and development of faculty and staff members within the department
- Where possible, he/she prevents, reduces, or resolves conflict within the department
- Mentors faculty members in the area of instructing and developing course content
- Monitors and evaluates faculty and staff performance and is responsible for keeping faculty and staff informed of department, institutional plans, policies, activities, and expectations
- Responsible for recommendations for faculty and staff hiring, merit, equity, promotion, tenure, and termination
- Contribute to student recruitment and orientation events
- Assists faculty with special or unusual student advising needs including student complaints about the program or courses
- Reviews course evaluations for the specific offerings of the program for the purpose of curriculum development and maintaining quality standards
- Where applicable, the program director is responsible for facilitating appropriate accreditation of the program and evaluation of the success of the program
- Has oversight of the program budget and contributes to the budget planning activities
- Establishes and enforces rules for behavior and procedures for maintaining student code of conduct
- Conducts quality assurance audits and participates in committees and meetings to receive and report information
- Demonstrates the ability to lead and facilitate diverse groups of people with an understanding of group dynamics
- Meets with employer affiliates to ensure training is relevant and accurate. Document placement efforts
- Attend staff meetings scheduled and participate in discussion of all required agenda items
- Always maintain a thorough knowledge of the school's mission and educational objectives and strive to attain them
- Participates in professional training and/or coursework as needed and required

Job Qualifications

- Education: Master's or bachelor's degree in the field of course instruction
- Experience: 5 years of related experience; or equivalent combination of education and experience

Skills: Excellent verbal & written skills, active listening, critical thinker, problem solver, leadership

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Instructor

Job Summary

Prepares lesson plans and instructs students in activities designed to promote social, physical, and intellectual growth.

General Accountabilities

- Instruct students individually and/or in groups, adapting teaching methods to meet student's varying needs and interests
- Teach and follow the school's published curriculum, using all teaching aids and handouts provided unless deviations are approved
- Develops lesson plans and prepares materials and classrooms for class activities
- Establishes clear objectives for all lessons and projects and communicates those objectives to students
- Assists students who need extra help by tutoring and offering more intimate training sessions.
- Assigns lessons and corrects homework
- Establishes and enforces rules for behavior and procedures for maintaining student code of conduct
- Meets with students to discuss student progress and to determine priorities for the student and their needs
- Prepares students for advancement by encouraging them to explore learning opportunities and to persevere with challenging tasks
- Observes and evaluates student performance, behavior, and/or job skill development
- Assesses the needs of class participants and modifies class content or teaching methods to meet those needs
- Conducts quality assurance audits and participates in committees and meetings to receive and report information
- Demonstrates the ability to lead and facilitate diverse groups of people with an understanding of group dynamics
- Meets with employer affiliates to ensure training is relevant and accurate. Document placement efforts
- Attend staff meetings scheduled and participate in discussion of all required agenda items
- Always maintain a thorough knowledge of the school's mission and educational objectives and strive to attain them
- Participates in professional training and/or coursework as needed and required

Job Qualifications

- Education: Master's or bachelor's degree in the field of course instruction
- Experience: 1-2 years of related experience; or equivalent combination of education and experience

Skills: Excellent verbal & written skills, active listening, critical thinker, problem solver

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Faculty Director

Job Summary

Responsible for providing leadership and mentorship support for all faculty and acts as a liaison between administration and faculty.

General Accountabilities

- Conducts quality assurance audits and participates in committees and meetings to receive andreport information
- Promotes wide knowledge and understanding of general education learning goals
- Provides support for the generation and articulation of all programs
- Coordinates and analyzes program course offerings and teaching methods
- Assists in hiring, firing training and managing of all faculty
- Submitting budgetary requests annually or on ana s needed basis
- Demonstrates the ability to lead and facilitate diverse groups of people with an understanding of group dynamics
- Meets with employer affiliates to ensure training is relevant and accurate. Document placement efforts
- Attend staff meetings scheduled and participate in discussion of all required agenda items
- Always maintain a thorough knowledge of the school's mission and educational objectives andstrive to attain them
- Participates in professional training and/or coursework as needed and required

Job Qualifications

- Education: Master's or bachelor's degree in the field of course instruction
- Experience: 5+ years of related experience; or equivalent combination of education and experience

- Excellent written and oral communication
- Active listening
- Critical thinker
- Problem solver
- Leadership skills
- Collaboration skills

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Financial Aid Representative

Job Summary

Develop and implement all federal student Aid requirements while managing the day-to-day operations of the department.

General Accountabilities

- Responsible for all Admissions and Enrollment requirements and processing
- Completing all compliance requirements for the third-party servicer
- Train to make sure the school is in compliant with third party Client Interface Software
- Collect and review required documents needed to process Financial Aid eligibility with a third-party servicer
- Ensure all first-time borrowers completed Direct Loan Entrance/Exit Counseling
- Monitor student's satisfactory academic progress (SAP) with Student Services
- Monitor student's clock hours for future disbursements
- Keep current with all federal regulations and changes with Financial Aid process to ensure school is complying

Job Qualifications

- Education: Bachelor's degree in education or related field
- Experience: 3-5 years of related experience
- Education: Financial Aid Fundamentals Training (Current academic year)

- Excellent written and oral communication
- Organizational skills
- Learning orientation
- Time management
- Collaboration skills
- Service orientation

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Compliance Officer

Job Summary

Responsible for developing, maintaining, and revising policies, procedures, and practices to ensure compliance with applicable federal, state and local laws.

General Accountabilities

- Inform and advise the faculty, staff and students of all relevant rules and guidelines set by governments and other regulatory bodies
- Update policies with current regulations
- Develop programs and practices to help meet guidelines
- Monitor programs and practices to ensure compliance
- Maintain all records required to certify compliance
- Maintain communication with all regulatory affairs
- Consistently report to management concerning the institution's compliance with laws and regulations
- Take action in dealing with noncompliance issues
- Conduct regular audits to identify potential noncompliance situations

Job Qualifications

- Education: Bachelor's degree in education or related field
- Experience: 3-5 years of related experience

- Excellent written and oral communication
- Organizational skills
- Time management
- Knowledge of regulatory guidelines and security policies
- Creativity
- Integrity
- Assessment and Interpretation

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Chief Technology Officer (CTO)

Job Summary

Responsible for outlining the company's technological vision, implementing technology strategies, and ensuring the technological resources are aligned with the institution's business needs and student learning outcomes.

General Accountabilities

- Constructs and present reports on the efficiency of all technology
- Formulates a comprehensive plan for the institution's technology status, goals and progress
- Align the technology resources with the institution's short- and long-term goals
- Identify and implement a plan for updating and improving technology equipment and software
- Manage the technology department budget and make recommendations for enhancements annually or on an as need basis
- Perform research on new technologies that could enhance business objectives or student learning outcomes
- Monitor the use and implementation of new and existing technologies across all departments
- Ensuring all technology practices adhere to regulatory standards
- Staying abreast with the technology trends and developments
- Working closely with industry partners and employers to make sure technology is up to date

Job Qualifications

- Education: Bachelor's degree in education or related field
- Experience: 5+ years of related experience

- Excellent written and oral communication
- Leadership Skills
- Knowledge of best information security practices
- Knowledge of latest technology advances
- Organizational Skills
- Multitasking and creativity Skills

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Director of Student Services

Job Summary

Provides vision, leadership, and strategic direction for student services while managing the day-to-day operations of the department.

General Accountabilities

- Manages and oversees functional areas of the institution
- Plans, coordinates, and executes incoming students' registration, testing, and orientation
- Develops, implements, and monitors departmental policies and procedures
- Actively participates in institution planning, development, and team building
- Monitor's student satisfaction and coordinates problem resolution
- Always ensures compliance with federal and state accreditation laws, standards, and regulations
- Develops and manages admissions department budgets and prepares reports
- Performs other related duties as assigned by management

Job Qualifications

- Education: Bachelor's degree in education or related field
- Experience: 3-5 years of related experience

- Excellent written and oral communication
- Organizational skills
- Learning orientation
- Time management
- Collaboration skills
- Service orientation

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Student Services Specialist

Job Summary

Contribute to the quality of students learning experience and academic success by problem solving and collaborating with students, staff, and faculty.

General Accountabilities

- Assist with planning, coordinaing, and executing incoming students' registration, testing, and orientation
- Actively participates in institution planning, development, and team building
- Monitor's student satisfaction and coordinates problem resolution
- Always ensures compliance with federal and state accreditation laws, standards, and regulations
- Performs admission interviews with potential students
- Monitors and tracks students SAP progress
- Problem solves and collaborates with all departments to ensure student success

Job Qualifications

- Education: High School Diploma or Associates' degree in education or related field.
- Experience: 1-2 years of related experience.

- Excellent written and oral communication
- Organizational skills
- Learning orientation
- Time management
- Collaboration skills
- Service orientation

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Chief Financial Officer (CFO)

Job Summary

Responsible for the schools overall financial and business affairs, including budget preparation of the general and auxiliary funds, Financial Aid services, human resources, and facilities management.

General Accountabilities

- Assist with PPA agreement between third party and process of creating G5, PELL, and Direct Loan accounts/ Reconcile accounts and maintain records toensure a clear audit trail
- Maintain a system of student accounts that records charges, credits, and amountsdue
- Collecting and disbursing any funds to students and/or Department of Education
- Ensure functions of authoring and disbursing Title IV funds remain separate
- Calculate return of Title IV funds (R2T4), if it applies to any students, with required time frame according to federal laws and regulations, and submittingcalculations to business office
- 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
- Drawdown and return Title IV, HEA funds to program accounts
- Establish and implement school's refund policy/ Reporting Title IV, HEA expenditures to the Department of Education in a timely manner
- Completing fiscal reports for federal funds and FISAP
- Maintain records consistent with Generally Accepted Accounting Principles (GAAP)
- And government auditing standards
- Prepare and participate in Financial Students Aid program reviews and audits

Job Qualifications

- Education: Master's or bachelor's degree in Finance or relevant alternative (preferred)
- Experience: 5-7 years' experience in business operations/finance

Required Skills

- Excellent verbal and written communication/ Public Speaker, critical thinker,
- Critical thinking/ Negotiation/ Judgement and Decision Making/ coordination

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School Director/ Chief Operations Officer

Job Summary

Plans, directs, and coordinates the academic, administrative, and auxiliary activities of school.

General Accountabilities

- Prepares, maintains, or oversees the preparation and maintenance of attendance, activity, planning, or personnel reports and records
- Reviews and approves new programs, or recommends modifications to existing programs, submitting program proposals for the school Institutional board to review as necessary
- Recommends personnel actions related to programs and services/ Directs and coordinates activities of teachers, administrators, and support
- Participates in special education-related activities, such as attending meetings and providing support to special educators throughout the district/ Organizes and directs committees of specialists, volunteers, and staff to provide technical and advisory assistance for programs
- Directs and coordinates school maintenance services and the use of school facilities
- Advocates for new schools to be built, or for existing facilities to be repaired or remodeled
- Plans and develops instructional methods and content for educational, or student activity
 programs. Develops partnerships with businesses, communities, and other organizations to help
 meet identified educational needs and to provide employer affiliate programs
- Meets with federal, state, and local agencies to keep updated on policies and to discuss improvements for education programs
- Reviews and interprets government codes and develops programs to ensure adherence to codes and facility safety, security, and maintenance
- Collects and analyzes survey data, regulatory information, and data on demographic and employment trends to forecast enrollment patterns and curriculum change needs

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Job Oualifications

- Education: Master's or bachelor's degree in School Administration or relevant alternative (preferred)
- Experience: 5-7 years' experience as an education administrator

Required Skills

- Excellent verbal and written communication/ Public Speaker/ decision making
- Critical thinking/ Negotiation/ Judgement and Decision Making/ coordination duties

Lead Career Specialist

Job Summary

Provides career counseling to students to assist them with successful entry into the job market.

General Accountabilities

- Assists students with a variety of career issues
- Develops and delivers workshops and classroom presentations addressing career paths for various majors and other pertinent topics
- Provides individualized attention to students requiring special assistance
- Possesses and maintains a thorough understanding of employment market and stays abreast of trends and changes
- Maintains current workshop and presentation materials and content
- Coordinates with education department members to understand individual student needs
- Establishes and maintains relationships with industries who seek to employ graduates
- Assists with outreach efforts to students
- Plans and attends career/job fairs and special events
- Represents the career center at campus events and programs
- Prepares accurate and timely reports as required
- Completes all necessary paperwork and maintains files and records
- Performs other related duties as assigned by management
- Manages and collects all CPL data for reporting metrics
- Assists all students with job readiness, resume and interview training
- Assists in the interview process with employer affiliates
- Management has the right to implement new daily tasks when needed

Job Qualifications

- Education: Associate degree or bachelor's degree
- Experience: One to two years of related experience

- Excellent written and oral communication
- Service orientation
- Excellent time management skills
- Thoroughness

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PERFORMANCE EVALUATION POLICY AND PROCEDURES

Major Goal:

To instruct, guide, and empower students effectively and prepare them for successful employment in the Digital Marketing and Information Technology Industry, which helps assure the school achieves its mission and educational objectives.

The following written plan and responsibilities must be acknowledged and performed for the annual review.

Instructors: Teaching Responsibilities (90% or more of daily scheduled work time)

- (1). Gain a working knowledge of the school's Student Handbook and Catalog, the standards of conduct, practical course requirements, grading policies criteria, Employee handbook, Employee Orientation Guide, job description and duties, and state/ federal regulations within 30 days of employment.
- (2). Teach and follow the school's published curriculum, using all teaching aids and handouts provided unless deviations are approved.
- (3). Learn any new course or teaching methods introduced during employment and follow them consistently.
- (4). Maintain a thorough knowledge of the school's mission and educational objectives and strive to always attain them.
- (5). Prepare for and participate in new student orientation according to school policy and as assigned.
- **(6).** Organize and prepare for each class presentation. Organize the necessary handouts, teaching aids and equipment before starting the class.
- (7). Follow and supplement published lesson plans. Present the information without reading from the text or lesson plan.
- (8). Project enthusiasm and excitement. Practice proper grammar and pronunciation. Be careful of tone, volume, and clarity of expression.
- (9). Maintain a thorough, accurate, and current knowledge of the subject matter taught.
- (10). Vary the stimuli for learners during presentations. Use body movement and gestures effectively.
- (11). Prepare practical and written assignments daily.
- (12). Inspire pride in workmanship and a professional attitude in your students toward their training and work responsibilities by your example.
- (13). Be fair and impartial in your dealings with all students.
- (14). Practice active listening skills when interacting with students. Listen carefully to their comments and questions.

- (15). Stimulate students to think for themselves and research the answers to questions for themselves. Use examples for clarification.
- (16). Use practical review questions and activities.
- (17). Ensure tests are graded promptly and give immediate feedback to students whenever possible.
- (18). Control argumentative or disruptive students by getting them involved. Assign leadership tasks and praise accomplishments.
- (19). Conduct practical evaluations and grade practical skills according to established grading criteria and record grades as required.
- (21). Explain and clarify grading criteria as needed
- (22). Ensure that students complete the required academic learning and practical skills training
- (23). Complete and conduct progress evaluations and perform academic counseling for students according to the school's policy. Discuss areas needing improvement as well as areas of accomplishment.
- (24). Identify a plan of action for improvement as needed. Follow up on plans for improvement during subsequent evaluations.
- (25). Properly prepare graduating students for the applicable practical examinations.
- (26). Monitor and fairly enforce the school's policies, standards of conduct and state regulations.
- (27). Never release private information on any student without obtaining written authorization from the student (or parent/guardian if applicable) on the designated form.
- (28). Be always readily available for students.

Other Duties (never more than 10% of scheduled work time)

- (1). Read, understand, and follow the responsibilities and policies outlined in the school's written operating procedures.
- (2). Attend staff meetings as scheduled and participate in discussions of all required agenda items.
- (3). Provide employment assistance for graduating students as needed. Document placement efforts and strive for a rate of 85% placement or better. Post job openings found in area newspapers and other publications on the Career Opportunities bulletin board.
- (4). Monitor inventory needs according to policy and report needs to administration.
- (5). Monitor bathrooms throughout the day to ensure cleanliness and sufficient supplies are available.
- (6). Complete any administrative tasks as assigned in a timely and accurate manner.

7). Connect with employer affiliates for Survey feedback forms to assess our programme.		
Signature Employee	 Date	

PERFORMANCE EVALUATION POLICY AND PROCEDURES

Major Goal:

To instruct, guide, and empower students effectively and prepare them for successful employment in the Digital Marketing and Information Technology Industry, which helps assure the school achieves its mission and educational objectives. All Administrative and Supervisory Staff will play a partin the development and progression of students from the pre-enrollment phase to the job placement phase.

The following written plan and responsibilities must be acknowledged and performed for the annual review.

Administration and Supervisory: Data entry/ Student Interaction Responsibilities (90% or more of daily scheduled work time)

- (1). Gain a working knowledge of the school's Student Handbook and Catalog, the standards of conduct, practical course requirements, grading policies criteria, Employee handbook, Employee Orientation Guide, Student Orientation Guide, All policies, and procedures within DSDT and job description and duties, and state/ federal regulations within 30 days of employment.
- (2). Guide and direct the students based upon the school's published curriculum, using all Handouts provided unless deviations are approved. Handouts would include: Student Handbook and Catalog, New Student Orientation Guide and tri-fold brochures for quick reference guides.
- (3). Learn and familiarize yourself with Campus Cafe and the secure portals in which we collect and maintain student information.
- (4). Maintain a thorough knowledge of the school's mission and educational objectives and strive to always attain them.
- (5). Prepare for and participate in new student orientation according to school policy and as assigned.
- **(6).** Orientation and compliance with all FERPA guidelines.
- (7). Orientation to all Secure Compliance measures with Internet, cyber and Student Data Protection/ usage.
- (8). Project enthusiasm and excitement. Practice proper grammar and pronunciation. Be careful of tone, volume, and clarity of expression.
- (9). Maintain a thorough, accurate, and current knowledge of all subject matter being taught.
- (10). Make sure you know DSDT's three programs, and the credential obtained upon graduation.
- (11). Prepare spreadsheets needed for upper management such as reporting metrics, and cpl data.
- (12). Inspire pride in workmanship and a professional attitude in your students toward their training and work responsibilities by your example.

- (13). Be fair and impartial in your dealings with all students.
- (14). Practice active listening skills when interacting with students. Listen carefully to them comments and questions.
- (15). Stimulate students to participate in the campus cafe document portal to upload their individual documents and to retrieve all their individual class schedules, progress reports and transcripts.
- (16). Meet with employer affiliates to grow our network of hiring for our graduates.
- (17). Ensure tests, progress reports and final grades are retrieved on time from the instructors.
- (18). Control argumentative or disruptive students by getting them involved. Assign leadership tasks and praise accomplishments.
- (19). Conduct and participate in job fairs and student success programs.
- (21). Explain and clarify grading criteria as needed if the students have unanswered questions.
- (22). Ensure that students complete the required academic learning and practical skills training
- (23). Participate in graduation planning events.
- (24). Identify a plan of action for improvement as needed for administrative cohesiveness in the workplace.
- (25). Properly prepare graduating students for the applicable practical examination in conjunction with the students' respective instructors.
- (26). Monitor and fairly enforce the school's policies, standards of conduct and state regulations.
- (27). Never release private information on any student without obtaining written authorization from the student (or parent/guardian if applicable) on the designated form.
- (28). Be always readily available for students.

Other Duties (never more than 10% of scheduled work time)

- (1). Read, understand, and follow the responsibilities and policies outlined in the school's written operating procedures.
- (2). Attend staff meetings as scheduled and participate in discussions of all required agenda Items. Attend bi-annual professional development seminars on campus.
- (3). Provide employment assistance for graduating students as needed. Document placement efforts and strive for a rate of 85% placement or better. Post job openings found in area newspapers and other publications on the Career Opportunities bulletin board.
- (4). Monitor inventory needs according to policy and report needs to administration.
- (5). Monitor bathrooms throughout the day to ensure cleanliness and sufficient supplies are available.
- (6). Complete any administrative tasks as assigned in a timely and accurate manner.

(7). Connect with employer affiliates for Survey fee	dback forms to assess our programs.
Signature Employee	——————————————————————————————————————

INSTRUCTORS/ ALL STAFF

CONTINUING/PROFESSIONAL EDUCATION POLICIES

All instructors and staff are required by the school to complete a minimum of 2 seminars (based on employment anniversary) of continuing education training, of which must be devoted to academic and practical learning delivery methods or professional development. It is the personal responsibility of each staff member or instructor to meet this requirement and provide documentation of such training to management for his/her personnel file. The school may periodically require employees to participate in job training or career development activities in addition to the regular work schedule. It is the goal of the school to participate in the development of its employees actively. However, it is believed that employees must be willing to invest both time and, if necessary, money toward self-improvement and professional development. Tuition for school-sponsored events will be waived. Most of the training for personal development/continuing education will take place on campus. If you choose to take training off-campus, it must be approved by the School Director in advance. Depending on the cost of the continuing Ed course, it may be approved or denied. You will have plenty of options to choose from for in-house training.

PLEASE NOTE: DSDT will hold development courses for academic and practical learning, leadership development, instructional and educational development, and job training/career development. It is the responsibility of the instructor to attend the sessions held by DSDT if you will not be attending outside courses throughout the year. Available training dates will be posted well in advance. By signing this agreement, you understand what is expected of you, and you will submit formal documentation of attendance on an annual basis.

Instructor Name:		Date:
-	-	

SECTION TWO

SCHOOL OPERATION

PLAN FOR DETERMINING THE EFFECTIVENESS OF STUDENT SERVICES

Purpose:

The plan is for determining the effectiveness of student personnel services. The School Director is responsible for this plan.

Objective:

To be sure that student and faculty requests are met in a timely, efficient, and accurate manner.

Procedure:

- 1. DSDT staff will utilize the Student Counseling and Recruitment Specialists to aid in the Support and Assistance of students as needs arise.
- 2. Counseling of the students will be a main priority as we prepare for a students' educational journey from the enrollment process- till the final job placement.
- 3. The Records Department Policies and Procedures and Placement Department's Policies and Procedures will be always complied with.
- 4. Student and alumnae need, reference, transcript, and educational records and employment/placement requests will be completed in a timely, efficient, confidential, and accurate manner always.
- 5. Student advisement will be conducted, documented, and retained in files and coordinated with faculty.
- 6. Student support assistance will be procured prior to enrollment.
- 7. The School Director and Faculty will provide staff and students with intranet, computer, and media support.

Evaluation:

- 1. The School Director and Director of Admissions will oversee Compliance and the Compliance Officer will spot check records for department compliance with policies and procedures throughout the year.
- 2. The School Director and the Compliance Officer review retention, completion, placement records and requests on a bi-annual basis for trends, or patterns. The Compliance Officer will share with staff monthly but will deep dive into this data on a bi-annual basis at our mandatory meetings.
- 3. The administration team will make recommendations for correcting deficiencies reported from evaluations of records, personnel services, placement, and advisement from students, committee members and all staff on a bi-annual basis.
- 4. Graduate student surveys, staff input, and audit reports will be utilized for evaluation.
- 5. DSDT has four programs for the institution and therefore, needs one institutional advisory committee and four occupational advisory committees, three individuals per each program. Since two programs were just approved in 2019 and one in 2021, we added the board members accordingly for the programs. DSDT's board members are all committed to our institution and are external to our organization. The Institutional advisory committee meets annually, and the occupational committees meet bi-annually to assess our occupational educational programs and their objectives.

- 6. Input is received from employers at the Annual Advisory Meeting and progress of the plan is evaluated and approved by the Committee members on an annual basis or bi- annual basis depending on whether you are a part of the Institutional Committee or the Occupational Committees.
- 7. The School Director evaluates all data and presents findings to instructional personnel and administrative staff at bi-annual staff meetings with the Institutional Advisory, Occupational Committees and School Director's bi-annual Summary.

Feedback:

DSDT utilizes input from committee members, students, and employees. The administration team reviews summaries of evaluations and reviews/revises plans, policies and procedures at least annually and as warranted. Student and employee policies and procedures are continually updated and assessed for accuracy. All plans are available in the operational manual.

STUDENT PLACEMENT AND FOLLOW UP PLAN

Purpose

DSDT provides market-driven technical education that meets the demand of employers for occupationally skilled workers. This policy outlines the assistance DSDT provides to match students with job openings.

References

Council on Occupational Education Handbook of Accreditation, Standard 3 Program and Institutional Outcomes and Standard 10 Student Services and Activities.

Definitions

Follow-up – The act of making formal contact to obtain specified accurate information from a particular person or employer.

Graduate – A student who has demonstrated the competencies required for a program and has been awarded the appropriate credential.

Job Board – A Physical job board is hanging at the facility and is used as a resource to post employment opportunities for students and graduates.

Placement – A completer of a program who (1) is employed in the field of education pursued or in a related field, or (2) has received the appropriate credentials.

Placement and Follow-up Plan – A plan that is used to ensure follow-up is systematic and continuous and includes (1) Identification of responsibility for coordination of follow-up activities, (2) Evaluation of results of data collected from graduates and employers of graduates, and (3) Objectives for the improvement of instructional outcomes.

Student Information File System - Files contain student coursework, testing, and records and are securely locked in a fire-proof safe to assure maximum confidentiality. These files are only accessible by the School Director, Chief Operations Officer, Director of Administration, Director of Student Services, and the Director of Admissions. The key to access the fire-proof safe is stored in a secure lockbox in the School Director and the Director of Admissions office. The key then unlocks the secured room and the files are held in a fire-proof safe for a period of no less than 5 years from the time of individual student enrollment. Online versions are only accessible via our Campus Cafe system and only the Director of Administration, Director of Admissions, Director of Student Services, Chief Operations Officer, and the School Director have access to student information on the secure server system. DSDT, upon request by students, provides transcripts containing the following information: program of study, courses or units of study completed with corresponding grades, and period of enrollment. After having successfully completed a program, students will then have the option to submit a request for a copy of their student file. All requests are to be made to the School Director, the Director of Administration or the Director of Admissions by email or telephone and allow 48 business hours to complete all requests.

Follow-Up Survey – A tool used to measure the success of training and services received at DSDT.

Survey Follow- up form

Student placement/outcome data are stored in individual student records and are maintained to reflect current and accurate information. The Systems are third-party safety secure with the data systems named (Boston Education), (Canvas), and (Campus Cafe).

Placement Services

Placement services are provided to program graduates and non-graduates and may include resume review, soft skills, interview skills, personal presentation for employment, and assistance with job placement.

Student Records

The School Director, career specialist, and the Director of Student Services maintain student resumes to be shared with employers seeking graduates. Student resumes are made available to employers for review and are either formally distributed via email, letter, survey monkey and/or in-person distributed by DSDT. All students will need to fill out a Record Release form and have it available in their student folder prior to DSDT acting on your behalf for employer verification.

Please Note*

Student Placement Policy and Procedures: If a resume is requested through email, information contained in resumes is made electronically secure and only available with the student's consent and signed media/ record release forms kept in the students file on record.

Online Job Boards

No online job boards will be available, but we do have a third-party company on board named E-hired that will send out new and existing job opportunities to all of our previous, past and present students.

Online Job Openings

Online job openings will be made available to students through email. Once a student completes an online application, a hiring manager at the company will be notified the student has submitted to an opening to which an interview will take place.

Job Openings

Notice of employer job openings received by faculty or staff are reported to the Career Specialists and posted to the job board within one working day or emailed to all students still pending gainful employment.

Follow-up Surveys

Follow-up surveys are conducted for students, former students, graduates, employers of graduates, and are used to provide data for program effectiveness, various modes of delivery, and relevance to job requirements. All follow-up data is made available to instructional personnel

and administrative staff during our employee bi-annual mandatory meetings. Various media resources, equipment, training methods, CPL data, and the Strategic Plan are reviewed and/or altered if a need presents itself. Placement and Follow-up Data is used as a means to evaluate and improve the quality of program outcomes, as well as the success of the institution in achieving its mission. It is reviewed by staff, instructional personnel, administration, Chief Operations Officer, and the School Director, Institutional and Occupational Advisory Committees, and Directors. All institutional employees are encouraged to make recommendations upon review at this time. All final review takes place prior to the end of the year/ 4th quarter, and prior to the upcoming new year. The end of the year annual review meeting is mandatory for all institutional staff whether instructional, administration, and/or Directors. Placement information is made available to all staff, instructional personnel, administration, Directors, Occupational and Institutional Advisory Committee Members. CPL data is given to all for annual review, this data is analyzed, and suggestions/comments and survey feedback forms are mandatory. All feedback forms are required prior to departure of end of the year/annual meeting adjournment.

Institutional Advisory Committee Review

The Institutional Advisory Committee meets annually to revise follow-up surveys, review the results of the surveys, CPL data, and Strategic Plan to help facilitate and/or implement the newly suggested criteria. The Institutional Advisory Committee is heavily involved in developing the follow-up plans, as well as the Occupational Committee Program members. All are instrumental in the development of the proper distribution of surveys and resource materials for institutional advancement and/or adjustments. Institutional Advisory Committee members review and discuss the material on an annual basis, and the Occupational Committee Members review data on a biannual basis. Advisory Committee review is written up in the meeting minutes, reported, and discussed with all staff and appropriate management to decide on final implementation and/or adjustments at one of our bi-annual meetings. If a need, concern, or addition to plans are decided upon, changes are made or implemented at that time. Reports and plans that are used for the improvement of job placement and follow-up services are altered if the need presents itself, and all management, staff, administration, and/or Committee members decide.

Procedures

- 1. Data Collection upon Enrollment.
- 2. On-going Data Updates to students on current opportunities with employment partners.
- 3. Career Services and Instructors notify and remind students to update their employment status by completing the follow- up survey when their status has changed. Students are reminded to fill out survey feedback forms via email, survey monkey, and written letter communication.
- 4. Follow-up Survey results are collected, evaluated, and entered in Campus Café by the Career Service Representative who specializes in job placement or the Director of Student Services.

- 5. Data Collection is assumed to be collected upon graduation but is collected on a continual basis as employment is gained. The Career Service Department is required to send out monthly surveys, written and/or email communication to collect data. The Career Service Coordinator is responsible for ensuring collected data is placed into the students' online records on Campus Cafe and hard copy format in the locked fireproof safe.
- 6. Prior to program completion, the Career Service Representative is responsible for ensuring all contact information is correct and updated if necessary. Exit interview/job placement surveys are conducted on a regular basis following program completion. Placement data may be collected using other means i.e., social networks, e-mails, phone calls or letters depending on the student's responsiveness. Follow-up surveys will be used to obtain feedback from students to assess the school curriculum and instructors in addition to reporting their work status.
- 7. Data Collection upon withdrawal is retained in individual student files for a minimum of five years following withdrawal. We ask all students who intend to withdraw from DSDT to complete the Follow-Up Exit Survey. All withdrawal forms are discussed and reviewed during the end of the year/ 4th quarter mandatory meeting prior to the following year enrollment. At this time, the CPL data is also reviewed. All are required and/or encouraged to make suggestions for higher student retention if needed.

Student Follow-Up

Student records that do not show exemption from follow-up, placement, or follow-up information are considered "negative outcomes." Instructors, student counseling services, and the School Director review the Student Outcomes report to review negative outcomes and follow-up with students. All student follow-up exemption records are reviewed at the end of the year meeting, during the end of the year/4th quarter, and prior to the start of the upcoming year. All suggestions and feedback are compiled and implemented if all institutional employees see the need to implement improvement activities. CPL data and the Strategic Plan are reviewed again in the analysis session.

Follow-up Methods

- 1. May include calling, emailing, sending letters, and contacting employers, and employer follow-up surveys.
- 2. The School Director, the Career Service Representatives, and/or Directors contact the employers of graduates to complete an employer follow-up survey to provide feedback on the quality of the former student's knowledge, skills, and performance.

Student Employment Assistance Procedures

1. Prior to completing the program, each student is encouraged by their instructor or Director of Student Services to register with the Career Specialist for employment counseling and to explore available local career opportunities, prepare for the job

search and interview, search online resources, and study recommended books.

- 2. The Career Specialist assists all students with resume review, interview skills, personal presentation, grooming standards, and placement.
- 3. Students are encouraged to register for online job search databases through online job search websites. Students are also encouraged to visit the job posting board for employment opportunities and give a current email address for the E-hired platform.
- 4. Students having difficulty attaining or maintaining employment are encouraged to visit with the Career Specialist and/or the other directors for employment counseling and other employment services.

Employer Assistance Procedures

- 1. If an employer should contact a DSDT employee, or a program instructor to inquire about hiring students, such contact is referred to the School Director or Career Specialists who assist the employer in posting the job listing on the Job Board.
- 2. The Admissions Representatives and the Career Specialists help students determine which training program will best suit the needs of the student and ensure marketability to future employers.

Student Placement Policy and Procedures

- 1. Regular communication with instructors, Admissions Representatives and/or the Career Specialists must occur as it is vital for student preparation to enter the workforce and become successful.
- 2. Instructors, Admissions Representatives, and/or the Career Specialist work with local employers to attain information regarding employment opportunities for students.
- 3. Instructors, Admissions Representatives, Institutional and Occupational Committee Members and/or the Career Specialists meet regularly with employers to share information about DSDT training programs and work to match students of a particular set of skills to a meaningful career opportunity.

MEDIA SERVICES PLAN 2022-2023

Scope and Availability of Services

DSDT recognizes the need to provide comprehensive media resources, and the proper learning tools for students to have open access to a wide variety of reference material both traditionally and through distance education. DSDT has a secure LMS system, Canvas, that students and staff have open access to, which, houses all our digital learning materials. This open platform allows the students to always have access and not just during normal school operation hours. The students receive a secure login with their email and password to both Canvas and Campus Café, this allows access to instructional materials, student enrollment info, course availability, curriculum, practice exams, syllabi, and much more. A mainserver hub system has also been installed for the student to securely login and house their specific files and all are encouraged to save their homework to their individual scan disk or flashdrive prior to logging off the net. Each student is asked to purchase one flash drive upon enrollment and is responsible to replace if lost. This will house the students' work and portfolio material for gainful employment endeavors upon graduation. The student media and resource center on campus are open to students during normal operation and are equipped with iMac computers, Adobe Illustrator software, adobe suite, books, flash drives, virtual labs, practice exams, and master curriculum binders, in addition to the traditional textbook and curriculum required for class. All student projects will be worked on in class and come equipped with the necessary software. If students are enrolled in a distance education program, they will still have the same educational materials available via our online training platform, and LMS system. All other program material available to assist the students will be available for use and must be requested in advance. We have an electronic system called Asset Tiger that keeps track of all our inventory for our instructional and media supplies. When the students or instructors check out inventory, they do so through a barcode system that allows us to see in real-time who has what and when it was checked out or back into the instructor. The Director of Inventory Supply & Management is responsible for maintaining the equipment and supplies.

Educational Materials Available

On campus there is a media resource center equipped with Hi-speed internet, PC's, and iMac computers fully loaded with software and accessibility to Canvas and Campus Café portals, if you have a secure login and passcode. Both instructors and students have access during normal operating hours; Monday through Thursday 10am-4pm and Friday 10am to 2pm. Students are free to use the equipment, learning resources and software programs during and throughout the student media service center normal operating hours. Students will have access to individual computers during class and may use the media resource material during the hours deemed available. Students who are currently enrolled and who may require evening access to the Student Media Room must receive prior authorization from their instructor, the school director or chief operations officer prior to access being granted. Students are encouraged to use our virtual labs and available books with learning material to further their studies. All traditional and distance education students have access to online supplemental materials through our available Canvas LMS system and will be given a login upon enrollment. Policies, procedures, catalogs, and manuals are available on our website and on campus anytime the student needs to reference the material. Master curriculum binders are available on Canvas LMS and on campus where students can access it during normal school hours.

Staff Person Responsible for Implementation and Coordination of Services

The overall responsibility for the availability and coordination of media services is the responsibility of the School Director and Chief Operating Officer on campus. Both the School Director and the Chief Operating Officer meet with the Director of Inventory and Supply Management on a quarterly basis to discuss topics related to the implementation and coordination of services offered to the students. The facility has adequate shelving, floor space, and units sufficient for housing the media resources provided by the institution, aside from the online institutional portals. So, whether the student is attending traditional or distance education, we have them covered. The instructor oversees implementing media services for his/her specific instructional program. He/she is responsible for delivery of media services to the students and for coordination with the Director of Inventory Supply and Management to keep media resource services/libraries updated on a regular basis.

Roles and Responsibilities of Designated Staff Members

Whenever an instructor needs any support material, he/she forwards his/her request to the School Director. All requests for director approval will be submitted in writing. The School Director then reviews the request and procures the resources. The Director of Inventory Supply & Management will then inventory equipment and resources. All equipment and resources will then be available to the Chief Operating Officer or the instructors for usage by students. Each instructor maintains the inventory list for media resource service activity on our Asset Tiger barcode system and coordinates with the Director of Inventory Supply & Management for continual cohesion and updates.

Orientation for User Groups

As part of the orientation process for students, instructors, and staff, they are provided information on the use of the Media Resource Center, online resources and how to access both. A full orientation and user guide are provided during pre-enrollment and orientation. Rules and regulations are provided to each new student or staff member during orientation.

Facilities Essential for Using Media Materials

Computers are available for students to use in the classrooms during class and in the media resource center during normal school operation hours; Monday through Thursday 10am-4pm and Friday 10am to 2pm, and all computers are equipped with the necessary software for the programs taught at our institution.

Provisions Made for Necessary Repair, Maintenance, and/or Replacement of Media Supplies

During daily monitoring, Media Center staff or the School Director will ensure that all equipment and supplies are in good working condition. In the event certain equipment or supplies fail to operate according to its intended use, those items will be submitted for replacement or repairs. Students are informed to notify Media Center staff or the School Director when supplies and equipment are not working properly. More information is provided on our Physical Resources and Technical Infrastructure plan regarding materials used in the Media Resource Center.

Annual Budgetary Support for Media Services

Due to the small size of the facility and limited number of staff members, the budget process is solely managed by the School Director. Funds are budgeted annually to support media services. All instructors and staff members are given a blank budget form to put down their suggestions for our budget on an annual basis at one of our mandatory meetings. The Institutional and Occupational Advisory members review the annual budget during one of our mandatory meetings. The committee members are given an opportunity to comment on and provide recommendations for additions/revisions to the annual budget during the meeting and on the committee survey feedback forms. The budget is then revised, and our strategic plan is updated for instructional, and media or library supplies based on traditional and distance education modes of delivery. After taking into consideration the financial aspects of the purchase and budget restraints, the School Director procures the requested items and after receipt and proper entry into the relevant classroom media resource inventory, the items are handed over to the Director of Inventory Supply & Management, who then bar codes, uploads into Asset Tiger and then is stored in the inventory locked cabinets or concerned instructor for immediate use. The School Director and the Director of Inventory Supply & Management are responsible for maintaining the media resource budget and keeping an accurate record of expenses for each program or department. Repairs on media equipment will be made on an as needed basis. Students and staff will be responsible for reporting needed repairs directly to the Director of Inventory Supply & Management via e- mail, voice mail or direct interaction. The repair request will then be sent to the School Director, who will identify the issue, and if necessary, obtain quotes from three vendors to arrive at the best repair price. The School Director will generate a purchase order. Replacement of equipment will occur on an as needed basis or pursuant to full amortization of each piece of equipment if necessary. In the event of an emergency where equipment is needed and the School Director is not present, the Chief Operating Officer may purchase and submit the item on an expense report.

Evaluation of the effectiveness of media services and utilization of the results to modify and improve media services

The effectiveness of media services will be determined by the number of students in each program who access media resources. Instructors, students, and staff will complete an annual survey to determine if the media resources and equipment provided for their program met their needs. Students will be asked to evaluate media services upon completion of their program. This information will be collected annually and presented to the School Director to be used for modifications and improvements. The staff annual meeting will discuss the feedback forms of media resource surveys gathered from the students, staff, instructors, employers, and employees. All the collected data will be analyzed to view the effectiveness of the resources and if a need presents, it will be implemented at that time or discussed with the Institutional Advisory Committee. All staff are encouraged to give true feedback at employee annual meetings and opinions/ needs will be considered for review. The budget will be altered and updated on an as needed and priority level basis with both traditional and distance education modes of delivery taken into consideration.

PHYSICAL RESOURCES AND TECHNICAL INFRASTRUCTURE PLAN

This policy establishes the basis for procedures and related assignment of responsibilities for the planning and management of the physical resources and equipment needs of DSDT. This policy recognizes the need, and specifically provides for:

General Responsibilities

DSDT's School Director and Chief Operations Officer are responsible for directing the overall planning and management of the physical resources and technical infrastructure of DSDT. This responsibility entails preserving and enhancing a quality physical environment which provides efficient, functional, safe and pleasant surroundings. DSDT owns the physical space of the campus, so it is important to keep the property maintained daily.

Responsibilities also includes upkeep, expansion, and upgrading of technical infrastructure. DSDT follows fire, electrical, and sanitary codes as found in annual inspections.

Day to Day Management

DSDT's School Director and Chief Operations Officer are responsible for day-to-day management, improvement, and any potential expansion of resources and technical infrastructure. The Chief Operations Officer will report to the school director.

Adequacy and improvement of Physical Resources and Technical Infrastructure: Physical Resources

DSDT 's Physical resources are managed by the directors and staff, as well as Sparkle Janitorial, Bicoastal Solutions, and ITS technology. As it is deemed necessary to add additional space for student classroom(s), lab(s), and or common space, the School Director is responsible for the process of developing the additions within the current building we occupy. Technical Infrastructure is added as student population and staff needs change. Also, technical infrastructure is added as budgetary constraints allow.

Maintenance/Physical Facility

DSDT has a contract with Sparkle Janitorial that works on campus no fewer than five days per week for regular sanitation and building maintenance/clean-up. This agreement allows for daily cleaning, parking lots, grounds upkeep, and facility upkeep. Anything other than these basic sanitation and cleaning practices will be contracted out by the School Director on an as needed basis or in the event Bicoastal Solutions and Sparkle Janitorial are not able to tend to.

Technical Infrastructure

DSDT 's School Director is responsible for all technical infrastructure maintenance. The School Director works with the Chief Technology Officer and plans the additions or build out associated with the current, future and daily needs of the institution. This would include all the servers, internet drops, back up data servers, printers, network connectivity, software and support infrastructure. If the needs are not able to be met, the project will be subcontracted out upon financial and fiscal need. The School Director assesses survey feedback forms to plan the upcoming yearly budget and allows budgeting for appropriate emergency situations: all other needs are planned. The School Director does weekly and general upkeep checks and assigns tasks to the CTO for adding of necessary equipment or infrastructure for students and staff if needed. Due to the size of the school, if the School Director is not available, the Chief Operations Officer or Directors may put in a request in the event of an emergent situation and on an "as needed basis", 24x7.

Technical Support and Student Orientation to Technology

Student orientation to technology is provided and technical support is readily available to all students through all modes of delivery (i.e., Distance Education and Traditional). We aim to provide the support necessary for students to be successful when using technical resources. To mitigate potential issues and provide technical support, we provide a Helpdesk email for our students upon enrollment. It can be reached by the following email address: helpdesk@dsdt.edu. Students are given orientation directions prior to enrollment and during orientation. The students will also be given orientation to all technology platforms for Canvas LMS and Campus Café from their instructors prior to accessing their courses. The staff is given orientation to all technology upon employment by the Faculty Director.

Instructional and Media Supplies

Supplies are maintained by the Director of Inventory and Supply Management. Supply levels are checked periodically and will be purchased accordingly on an "as needed" basis only. The Director of Inventory and Supply Management will notify the School Director, or the Chief Operations Officer to complete the request for purchase. The Director of Administration is also responsible to put in a request for basic school supplies. If the School Director and the Chief Operations Officer are not available, the Director of Administration is allowed to complete the purchase within a reasonable timeframe. No other staff member has the authority to purchase supplies unless one of the above-mentioned individuals approves the request. Suggestions may be made at employee meetings based upon feedback of student and employee survey feedback forms. All other basic supplies are ordered on a quarterly basis. A budget is handed out at our mandatory bi-annual employee meetings and staff are encouraged to forecast items they may need during the current or upcoming year.

Equipment

All equipment needing repairs are reported to the School Director and the School Director deems if the equipment needs repair or to be replaced. The School Director will meet with the Chief Operations Officer to see if a repair is needed or if the actual purchase of new replacement equipment is best. DSDT always ensures network functionality by having Cronus Communication internet service as a redundant ISP in the event Xfinity Business were to have network outage.

Disposal of Obsolete Equipment

Maintaining, replacing, or disposing of outdated equipment is vital to the continuance of quality instruction and training. DSDT's Director of Inventory and Supply Management follows the written plan with the objectives using an online Asset Tiger management system to assure equipment is up to date, relevant and accurately accounted for. In the event we need to dispose of the obsolete equipment, we do so with the input of the instructional staff and students. All disposal follows appropriate business and industry safety standards, and we are in line with our State LARA body requirements for our training program equipment regulations.

All Instructional Equipment meets appropriate and required safety standards

All equipment purchases, repairs/ maintenance, and operational procedures follow appropriate industry safety standards. Staff and students use the manufacture safety guidelines and follow the manuals given to them from their instructor by the distributor for set up and daily usage. The instructors make sure the students are following proper safety procedures for their learning environment. The safety training is part of every program and are taught according to our state laws from LARA, we do not need to do anything other than what we currently teach being a technology school.

Safety, Privacy, and Security of Data

All student records are maintained on a secure server and housing system by our third-party servicers, Campus Cafe, Canvas LMS, and Boston Educational Network. We also have a secure server system internally that is managed by our Information Technology Instructors and Chief Technology Officer. A secure backup server is installed and can be accessed by all computers for student, employee, and

instructional files. One hub secures backup data that our CTO can access. Campus Cafe data will be stored for a period of no less than 5 years. Each staff member and instructor have separate usernames on Campus Cafe and can only access student data necessary for their function and/or class. Each student is given their own unique user login and passcode to assure safety of personal information. DSDT's Network is continually backed up by iCloud, and Dropbox a cloud system which provides for secure storage of all data. Security Software is utilized to catch viruses and other threats to systems.

Safety of Staff, Students, and Guests

DSDT strives to maintain safe environments for everyone. The facility includes classrooms, Media Services Center, bathrooms, kitchen, labs, and common areas. We have annual fire inspections and daily walkthroughs and inspections of environment (maintained by staff and School Director); as well as information regarding severe weather precautions, which can be found in our Consumer Info at a Glance on our website.

Incident reporting for any accident of staff, instructor, student, or guest: Each incident is reviewed for improvements that can be made to avoid future incidents. DSDT has:

- A. Fire Extinguishers located in common areas with signage.
- B. First Aid supplies kept in the main hallway of school.
- C. Insurance for accidents and other needs.
- D. A School Director or Director of Operations are present from 9am-5pm and security personnel are present from 5pm-10pm to control daily/nightly traffic and supervise as students leave the building to reduce accidents.
- E. Safety, accident, injury and emergency report forms for a systematic controlled process.

Distance Education Infrastructure

DSDT School Director is responsible for developing and maintaining distance education infrastructure. The School Director works closely with the Chief Technology Officer to develop and plan for all online platforms to incorporate a seamless integration of distance education into DSDT's institution. The same resources, software, and support infrastructure are available to all students across all modes of delivery. This includes, Canvas LMS and secure login portals, networks, and servers. If the needs are not able to be met, the project will be subcontracted out upon financial and fiscal need. Students taking distance education courses at DSDT have the opportunity to comment on technical infrastructure and annual budgetary allotment to improve or enhance online learning. The School Director assesses survey feedback forms to plan the upcoming yearly budget and allows budgeting for appropriate emergency situations: all other needs are planned. The School Director does weekly and general upkeep checks and assigns tasks to the CTO for adding of necessary equipment or infrastructure for students and staff if needed.

Due to the size of the school, if the School Director is not available, the Chief Operations Officer or Directors may put in a request in the event of an emergent situation and on an "as needed" basis, 24x7.

HEALTH & SAFETY PLAN SECTIONS

Overview

The DSDT administrative, instructional, and support staff is diligent in ensuring a safe, orderly, and positive physical learning environment for the protection of the health and safety of students, staff, and guests. The Michigan Post- Secondary School Division policy and procedures are implemented at the Detroit Campus, to fulfill the goal of a safe & healthy environment daily. DSDT's policies, processes, and procedures relating to health & safety issues are in place, implemented, and regularly evaluated & revised with input from employees & students. In addition, all staff follow a system for reporting & investigating accidents. DSDT has developed & promotes a comprehensive program to ensure the safety of its employees, students, and visitors. The safety program includes guidelines and procedures for responding to emergencies and activities to help reduce the frequency of accidents and injuries. To prevent or minimize injuries to employees, coworkers, and students and to protect and conserve DSDT'S equipment, employees must comply with the following requirements:

- Observe all safety rules and familiarize yourself with DSDT's critical plan for fire evacuation, incident plans/procedures, and emergency preparedness protocols.
- Always keep work areas clean & orderly and immediately report all accidents to the school director or management. Operate instructional material/equipment only after proper training has been administered and under the supervision of instructor and/or School Director.
- All employees must wear business casual clothing while on campus or must have appropriate DSDT T-shirt (available for purchase), jeans/slacks, and closed-toe shoes.

Employees with questions or concerns relating to the safety programs and issues should contact their immediate School Director or the Detroit Police /Fire Department. Local numbers are posted on the walls of the campus or in the student manual made available to you prior to enrollment.

Visitors in the Workplace

All visitors are required to enter the facility through the main entrance and sign the sign-in sheet, stating their name, phone number, email, and reason for visit. All secondary doors must be closed and secured at all times. School visitors must show proper identification and be screened through the school's visitor management system. This is to ensure the safety of our students, employees, and guests. In an effort to minimize classroom disruptions and mitigate any emergency situations, no student or visitor shall be permitted to wander about the building under any circumstances. Students who are currently enrolled and who may require evening access to the Student Media Room must receive prior authorization from their instructor, the school director or chief operations officer prior to access being granted. Employees who observe an unauthorized individual on DSDT premises should immediately direct him/her to the administration office or contact the administrator in charge. All nighttime visitors must follow the same procedures required for entry into the building and these procedures are monitored by appointed security personnel. No employee of the school system shall have a weapon in his or her possession while on school property or at a school activity. Guns, whether operable or inoperable, loaded or unloaded, facsimile weapons, or antique weapons may not be brought on to school property, including the parking lot or to a school activity. Any weapon confiscated shall be immediately turned over to the School Director who shall turn the weapon over to the proper authorities. Authorized law enforcement officers, including school campus officers, if employed by DSDT, may have weapons in their possession while on duty.

Bullying and Harassment

It is the policy of DSDT, that all its students and school employees have an educational setting that is safe, secure, and free from harassment and bullying of any kind. DSDT will not tolerate bullying and harassment of any type. Conduct that constitutes bullying and harassment is prohibited. The following are general processes and procedures designed to assure students, staff, and guests that DSDT is a safe & healthy environment in which to teach and learn.

Accident Reporting System

DSDT follows the state of Michigan (LARA) post-secondary policies and procedures regarding the reporting of accidents to employees, students, or the public. If an employee suffers a work-related injury/illness, DSDT is committed to returning them to the same status of function they enjoyed before the injury/illness and bring them back to work as quickly as possible.

As an employee, you have a right to:

- Receive timely and appropriate medical care for injuries sustained during, or arising out of, your employment.
- Receive timely & understandable information concerning your treatment including available alternatives & their effectiveness.
- o Receive your treatment with dignity, courtesy, respect, privacy, and with all the confidentiality specified, as well as request a one-time independent medical examination.

As an employee, you are responsible for:

o Immediately reporting any injury received on the job to your School Director/manager, prior to seeking medical care for an occupational injury that does not require emergency treatment.

Claim Reporting System

In the case of injury or illness requiring services that are not an emergency (back pain, sprained ankle, etc.), the employee must notify his/her School Director, who, in turn, will receive care/medical/ambulance authorization prior to obtaining care. The injured employee must be available by telephone to discuss his/her injury status with the School Director.

ALL INJURIES SHOULD BE REPORTED THE SAME DAY THEY OCCUR WITHOUT DELAY.

Emergency Care

If it is a true emergency, have someone call 911 or take you to the nearest emergency room. Please contact your immediate instructor or School Director to help facilitate. Any additional medical care that is needed will be coordinated through them. After hours medical care is available 24 hours a day, seven (7) days a week (including holidays) in nearby urgent care centers. If for some reason the employee should go to the Emergency Room or Urgent Care facility, the employer, and/or the subcontractor must call the School Director immediately, or no later than, the next business day to report such visits.

If a student suffers an on-campus related injury/illness, a Student Accident Report (Addendum A) should be completed on the same day of the incident and submitted to the Director of Administration on the sameday. The Administration Director will retain a copy for DSDT's files and add a copy to the student's files. For non- students or subcontractors that suffer work related injury/illness, a Public Incident Report (Addendum B) should be completed on the same day of the incident and submitted to the Director of Administration that day. The director will then file in a timely manner or within the 24-hr, period.

Accident Investigation System

The school director completes a health and injury report as necessary and submits the report to DSDT's office of secure files, before the end of the working day on which the incident is reported. An Incident Report or Student Accident InjuryReport is to be submitted to the School Director and will be investigated through department procedures.

Emergency Response Plan

Every DSDT classroom has a copy of the campus evacuation and safety/health emergency plan. Throughout the school year, the plan is reviewed with staff. The plan is designed as a quick reference resource for the classrooms and is found in the Consumer Info at a Glance section on our website for reference. It provides essential information to assist staff in responding to a wide range of threats and hazards that may affect the school. DSDT's Emergency Operations Plan considers lessons learned from prior school trainings to highlight the importance of preparing for any hazard or emergency. DSDT's Emergency Operations Plan is aligned with

the emergency planning practices at national, state, & local levels and includes the five phases of emergency preparedness: Prevention, Protection, Mitigation, Response, and Recovery. Part of DSDT's Emergency Operations Plan requires the school site to conduct annual trainings for various scenarios (fire, bomb threat, severe weather, public lockdowns, limited lockdowns, directional evacuations, etc.) for staff, students, and visitors to be prepared during critical incidents. Each classroom has an emergency evacuation map posted that the instructor discusses with their class. The school has an annual emergency evacuation training, in which a fire drill simulation is conducted. Drills are conducted so that students and personnel can react quickly & appropriately to an actual incident on campus. This plan is revised annually or more frequently if needed.

Crisis Response Plan

The DSDT Crisis Response Plan is part of the DSDT's Emergency Operations Plan, which provides the school site with a guide for effective response to a critical incident. Our campus site will be adequately prepared to deal with an emergency. Roles and responsibilities will be outlined to aid in the organization of preparation, response, & recovery from a threatened or actual emergency and will be given to students prior to enrollment.

Fire Extinguisher Maintenance Plan

All fire extinguishers are maintained by Fire Systems of Michigan and checked annually.

Evaluation & Revision

DSDT's health and safety written plan is reviewed annually by DSDT's Institutional Advisory Committee Board, to ensure compliance with LARA post-secondary school licensing division guidelines, as well as adequacy. Students, employees, and visitors will use this form to report school related injuries, illness, or "near miss" events (which could have caused an injury or illness) - no matter how minor. This helps us to identify student plans/procedures and emergency preparedness protocols and correct hazards before they cause serious injuries. This form shall be completed by students as soon as possible and given to the Director of Administration. Always keep work areas clean and orderly, and immediately report all accidents to the school director or management on staff. Operate instructional material/ equipment only after proper training has been administered and under the supervision of instructor/ and or School Director. All employees must wear business casual clothing while on campus or must have appropriate clothing provided (for purchase by student), DSDT T-shirt, jeans/slacks, and closed-toe shoes. Employees caring for injuries sustained during, or arising out of, on campus activities should direct your questions or concerns relating to the safety programs or issues immediately to the School Director, or Detroit Police /Fire Department. Local numbers are posted on the walls of the campus, or in the student manual made available to the student prior to enrollment. All visitors are required to enter the facility through the main entrance and sign the sign-in sheet, stating their name, phone number, email, and reason for visit. School visitors must show proper identification and be screened through the school's visitor management system. This is to ensure the safety of our students, employees, and guests. In the event of an emergency or unforeseen event that needs immediate care other than what the institution can accommodate, call 911 and complete an Accident Report form. Have the student, School Director, or the administrator who charted the incident acknowledge and sign off on documentation.

Individual completing this form, please circle the correct one:
Student / Staff member/ Committee Member/
Patron of the Facility

Signature	Date

Today's Date:		
Incident Report		
DSDT		
1759 W. 20 _{th} Street		
Detroit, MI		
48216		
Students, employees, and all visitors will use this form to r events (which could have caused an injury or illness)- no n hazards before they cause serious injuries. This form shall to a school director/ instructor for further action.	natter how minor	. This helps us to identify and correct
I am reporting a work related: □ Injury	□ Illness	□ Near Miss
Your Name:		
Instructor/Supervisor:		
Have you told your instructor/supervisor about this injury?	□ Yes	□ No
Date of injury/near miss:	Time of injury/	near miss:
Name of witness (if any):		
Where, exactly, did it happen?		
What were you doing at the time?		
Describe step by step what led up to the injury/near miss. ((Continue on bac	k if necessary)

What parts of your body Were injured? If a near miss, how could you have been hurt?				
Did you see a doctor about this injury/near miss?	□ Yes □ No			
If yes, whom did you see?	Doctor's phone #:			
Part of body affected: Front Right Written witness statement:	Nature of the injury you're reporting: Abrasion, scrapes Amputation Broken bone Bruise Burn (heat) Concussion (to the head) Crushing Injury Cut, laceration, puncture Illness Sprain, strain Other:			

Why did the incident happen?	
□ Unguarded hazard	□ Other:
□ Safety device is defective	
□ Tool or equipment defective	
□ Workstation layout is hazardous	
□ Unsafe lighting	
□ Unsafe ventilation	
☐ Lack of needed personal protective equipment	
☐ Lack of appropriate equipment/tools	
□ No training or insufficient training	
What changes do you suggest preventing this incident/ near	ar miss from happening again?
□ Stop this activity □ (Other:
□ Redesign school area	
☐ Train/ enforce policy	
• •	
Your Signature:	Date:
Tour organitation	2400
For administrative use only	
Written by:	Date:
Job title:	
Names of team investigating:	
Reviewed by:	Date:
Job title:	
Why did the unsafe conditions exist/ why did they	
occur? Were there unsafe acts or conditions reported	
prior to the incident? Have there been similar incidents	
or near misses prior to this one?	

HEALTH SAFETY AND EVACUATION POLICY

All new students/ employees must complete this form before they enter school program or work environment.

- · Please review every room at facility for the immediate evacuation route in event of an emergency or fire.
- Please report all investigations and or incidents to the fire department by calling 911 and give the name of DSDT and address: 1759 W. 20th Street, Detroit, MI. 48216.

BASIC REQUIREMENTS FOR A SAFE WORKPLACE

- Proper Ventilation: Some fumes can be harmful.
- Proper Use of Flammables: Read labels and always follow precaution. Proper use of chemicals and materials: Please refer
 to teacher/ student manuals. If your class is using any of them, they will be listed in your manual and reviewed in
 introductory class.
- Designated smoking areas: Never smoke or permit clients to smoke while being served. Avoid other sources of open flames.
- Safe Product Storage: Store products in closed containers and prevent spills or leakage. Store in the adequately ventilated area and in moderate temperature.
- · Protection during application: Follow directions, wear gloves and/or goggles as directed. Apply your professional training.
- Proper Use of First Aid: First aid kit is available and at the front desk and by the bathrooms.
- Fire Safety: Posted and must be reviewed for evacuation procedure during new student/employee orientation.

IN THE EVENT OF A FIRE:

- Contact the fire department (911) and give the name and address of DSDT, the nature of fire (what is burning), and the name of person reporting the fire. Evacuate premises by following the planned procedure for the facility.
- Alternate exits for use in the event the fire blocks regular route.
- Fire extinguishers are serviced annually.

USE OF FIRE EXTINGUISHERS

Install away from potential fire hazards and near an escape route. Follow the instructions. Many works as follows:

- 1. Pull the pin
- 2. Aim the nozzle

3. Squeeze the handle

4. Sweep from side to side at the base until fire goes out

RECOMMENDED PROCEDURES

The National Fire Protection Association recommends that you should ONLY stand and fight a fire if ALL the following are TRUE:

- Everyone is leaving the premises and the fire department has been called
- The fire is small and confined to the work area where it started (wastebasket, cushion, small appliance, etc.)
- You can fight the fire with your back to an escape route
- Your extinguisher is rated for the type of fire you are fighting and is in good working order
- You know how to operate the extinguisher

Individual completing this form,	please circle the correct one:	Student / Guest / Employee

Signature Date



EMERGENCY RESPONSE AND EVACUATION PLAN

PURPOSE

DSDT is dedicated to providing employment opportunities in the technology industry to the students we serve. Sometimes incidents may emerge that require immediate actions and therefore it is mandatory the school has an emergency readiness plan. The purpose of the Emergency Response and Evacuation Plan (EREP) is to ensure the safety of all who work on, attend or visit the school's campus in accordance with local, state and federal regulations.

DSDT's campus is required to maintain an Emergency Response and Evacuation Plan (EREP) which incorporates the five phases of emergency preparedness: Prevention, Protection, Mitigation, Response, and Recovery. Together these elements assist in ensuring campus faculty, students and visitors alike have guided instructions outlined and detailed in the event of an emergency and evacuation. The chief operations officer is designated as the emergency safety authority (ESA). In this role, the chief operations officer shall be responsible for reporting and ensuring the evacuation of the campus in the case of an emergency.

For additional information, please contact the school director at 313-263-4200.

Jámie Harris, CEO

DSDT

1759 W. 20th Street Detroit, MI 48216

EMERGENCY RESPONSE PHONE NUMBERS

Campus Non-Emergencies 734-271-2793
Campus Emergencies 911
Police Department 313-224-3000
Fire Department 313-899-1420
Ambulance 313-879-2020

PROCEDURES FOR REPORTING FIRE OR OTHER EMERGENCIES

Instances of emergencies shall be reported to local authorities by calling 911. After 911 has been contacted, please call the emergency safety authority at 734-271-2793.

Employee Responsibilities

- 1. Reporting any emergency situation;
- Reading and understanding these procedures
- Being aware of their primary and secondary emergency exits;
- Asking questions when any information is unclear or not understood:
- Understanding the proper operation of emergency evacuation equipment;
- Informing supervisor of special emergency evacuation needs.

Supervisor Responsibilities

- Providing staff, students and visitors emergency response information and training;
- Identifying mobility impaired employees who might need assistance during evacuation;
- Providing opportunity for employees to ask questions.

EMERGENCY REPORTING AND EVACUATION PROCEDURES

Types of emergencies to be reported by ESA are:

- · FIRE
- BOMB THREAT
- SEVERE WEATHER
- PUBLIC LOCKDOWNS
- · LIMITED LOCKDOWNS
- DIRECTIONAL EVACUATIONS
- · OTHER (specify)_

(e.g., terrorist attack/hostage taking)

Evacuations Routes

· Evacuation route maps have been posted in each work area.

The following information is marked on evacuation maps:

- 1. Emergency exits
- 2. Primary and secondary evacuation routes
- 3. Locations of fire extinguishers
- 4. Fire alarm pull stations' location
- · Faculty and staff should know at least two evacuation routes.

FIRE EMERGENCY

When fire is discovered:

- · Activate the nearest fire alarm (if installed)
- · Notify the local Fire Department by calling 313-899-1420.
- . If the fire alarm is not available, notify the ESA AT 734-271-2793

Fight the fire ONLY if:

- . The Fire Department has been notified.
- . The fire is small and is not spreading to other areas.
- · Escaping the area is possible by backing up to the nearest exit.
- . The fire extinguisher is in working condition and personnel are trained to use it.

Upon being notified about the fire emergency, occupants must:

- · Leave the building using the designated escape routes.
- · Assemble in the field adjacent the school next to Donovans:
- · Remain outside until the ESA announces that it is safe to reenter.

ESA must:

- · Disconnect utilities and equipment unless doing so jeopardizes his/her safety.
- · Coordinate an orderly evacuation of personnel.
- · Perform an accurate headcount of personnel reported to the designated area.
- · Determine a rescue method to locate missing personnel.
- Provide the Fire Department personnel with the necessary information about the facility.
- Perform assessment and coordinate weather forecast office emergency closing procedures

All member of the staff must:

- · Ensure that all employees have evacuated the building.
- · Report any problems to the ESA at the assembly area.

Assistants to Physically Challenged should:

· Assist all physically challenged employees in emergency evacuation.

TELEPHONE BOMB THREAT CHECKLIST

	TERISTICS	SPE	ECH	LANGUA	GE
_Loud _High Pitch _Raspy _Intoxicated	Soft Deep Pleasant Other	Fast Distinct Stutter Slurred	Slow Distorted Nasal Other	EXCELLENT Fair Foul	Good Poor Nasal
ACCE	NT	MAN	NER	BACKGROUND	NOISES
_Local _ _Foreign _ _Race	_Not Local _Region	Calm Rational Coherent Deliberate Righteous	AngryIrrationalIncoherentEmotionalLaughing		rains Animals Quiet /oices Airplances Party Atmospher
DETEND DIEFIC	NIII TV LIEADIN		FACTS	- IF THE CALLER S	SEEMS.
					DEEMS
GREEABLE TO	FUNTHER CO				

Activate	malicious	call trace: Hang	up phone	and do n	ot answer	another line	Choose	same line
and dial	*57 (if you	r phone system	has this c	apability).	Listen for	the confirma	ation	
annound	cement an	d hang up.						

	Call Security	∕at and	d relay	information	about	the	cal
--	---------------	---------	---------	-------------	-------	-----	-----

Did the caller appear familiar with the campus (by his/her description of the bomb location)? Write out the message in its entirety and any other comments on a separate sheet of paper and attach to this checklist. Notify your supervisor immediately.

SEVERE WEATHER

Tornado:

- When a warning is issued by sirens or other means, seek inside shelter.
 - Consider the following:
 - Small interior rooms on the lowest floor and without windows,
 - Hallways on the lowest floor away from doors and windows, and
 - Rooms constructed with reinforced concrete, brick, or block with no Windows.
- · Stay away from outside walls and windows.
- · Use arms to protect the head and neck.
- · Remain sheltered until the tornado threat is announced to be over.

Earthquake:

- · Stay calm and await instructions from the ESA.
- · Keep away from overhead fixtures, windows, filing cabinets, and electrical power.
- · Assist people with disabilities in finding a safe place.
- · Evacuate as instructed by the ESA.

Flood:

If indoors:

- · Be ready to evacuate as directed by the ESA
- · Follow the recommended primary or secondary evacuation routes.

If outdoors:

- · Climb to high ground and stay there.
- · Avoid walking or driving through flood water.
- · If a car stalls, abandon it immediately and climb to a higher ground.

Blizzard:

If indoors:

- · Stay calm and await instructions from the ESA.
- · Stay indoors!
- · If there is no heat:
 - Close off unneeded rooms or areas.
 - Stuff towels or rags in cracks under doors.
 - Cover windows at night.
- Eat and drink. Food provides the body with energy and heat. Fluids prevent dehydration.
- · Wear layers of loose-fitting, light-weight, warm clothing, if available.

If outdoors

- · Find a dry shelter. Cover all exposed parts of the body.
- · If shelter is not available:
 - Prepare a lean-to, wind break, or snow cave for protection from the wind.
 - Build a fire for heat and to attract attention. Place rocks around the fire to absorb and reflect heat.

- Do not eat snow. It will lower your body temperature. Melt it first. If stranded in a car or truck:
 - · Stay in the vehicle!
 - Run the motor about ten minutes each hour. Open the windows a little for fresh air to avoid carbon monoxide poisoning. Make sure the exhaust pipe is not blocked.
 - · Make yourself visible to rescuers.
 - Turn on the dome light at night when running the engine.
 - Tie a colored cloth to your antenna or door.
 - Raise the hood after the snow stops falling.
 - · Exercise to keep blood circulating and to keep warm.

LOCKDOWNS

In the event of an emergency and notification of a campus lockdown, please follow the procedures below.

- · Remain calm. Encourage others to remain calm.
- Immediately cease all activity (i.e. teaching, group work, meetings etc...)
- Lock or barricade all doors where possible; use furniture or desks as cover
- If possible, cover any windows or openings that have a direct line of sight into a hallway.
- Shut the blinds or pull the shades down. Turn off the lights and try to give the impression that the room is empty.
- · Stay low, away from windows and doors
- Sit on the floor or crouch under or behind desks and bookshelves where possible, so as to be as invisible as possible.
- Immediately put all cell phones on "Vibrate" or "Silent" mode. Calls to 911 should be made only if specific information becomes available regarding the location or conduct of the intruder or if the status of the emergency changes.
- · Be as quiet as possible.
- DO NOT respond to anyone at the door until an "all clear" message is received via campus notification systems or if you are certain it is safe to do so (i.e. if police are at the door).
- If you are directed by police to leave your secured area, assist others in moving as quietly and quickly as possible.
- Do not sound the fire alarm in the building unless there is a fire. People may be
 placed in harm's way when they are attempting to evacuate the building. If a
 fire alarm does go off during a lockdown, do not evacuate unless you smell
 smoke or see fire in your area.
- If you are outside of a building when a lockdown is announced, if it is safe to
 do so, run into the nearest building with hands raised above head and palms
 facing outward and follow the above lockdown instructions. If it is not safe to
 run into a building, hide behind a large heavy object (i.e. vehicle, tree). Notify
 911 of your location when safe to do so. If off-campus do not return and follow
 official instructions from the campus notification system.
- Be aware of alternate exits if it becomes necessary to flee.

ACCESS TO STUDENT RECORDS POLICY AND PROCEDURES

Student Access to Files and Records

Each student has the right to view any items in their files and may do so by request. This request will be granted within a reasonable amount of time to accommodate the office's schedule. At no time may a student remove any items/articles from their file. The School Director is the official custodian of the records. All records will be maintained for 5 years from the date of graduation or termination from the school and will be kept on campus. The School Director may request other school personnel to assist in answering any questions that students may have regarding the interpretation of the records.

In all cases where access to student education information is requested, except as provided in this policy, a written request to see the files must be made by the student. The School Director, upon receipt of this request, will provide access to review the records at a date and time no more than 48 business hours upon receipt of the request. Students are required to sign a record release form upon enrollment of classes. The student or individuals the student duly authorizes may examine the file in the presence of the School Director and/or another person(s) designated by her/him. The record itself may not be taken from the school premises. However, upon request, one copy of the records shall be provided within a reasonable time at no charge. Additional copies may be obtained at the cost of \$1.00 per page.

If a request from an outside agency for information regarding a student is received, the school will not release any information without the student's express permission. The request must be made in writing, clearly stating the agency requesting the information, and include the student's signature. Only the School Director, Director of Admissions, or his/her designee will be permitted to release information.

Documentation of any correspondence will be placed in the student's file. The school will disclose personal, identifiable information from the records of a student without the written consent of the student to the following parties:

- a. School employees who have a "need to know".
- b. Organizations performing authorized studies or reports for the school.
- c. Individuals who have obtained court orders or subpoenas, or in case of health and/or safety emergencies.

Campus: 1759 W. 20th Street Detroit, MI 48216 Main Phone Line: (313) 263-4200 Admissions@dsdt.edu

OPERATIONS AND MAINTENANCE PLAN

The Operations and Maintenance Plan for DSDT is executed by the School Director and the Chief Operations Officer. If any of the following issues arise, it must be reported directly to the Chief Operations Officer or the School Director.

- Loss of heat or air
- Water main breaks
- Gas leaks
- Roof leaks

- Electrical malfunctions
- Plumbing issues
- Broken meters

The Chief Operations Officer or School Director will then contact the appropriate contractor to fix the issue at hand. If necessary, local authorities must be contacted. Examples of this would be to contact DTE for down power lines, and Consumers Energy for gas leaks.

Personnel Responsible

Major repairs and maintenance to the physical facility such as building repairs, and heating and cooling breakdowns, are managed by the school director. If the School Director is off campus, the Chief Operations Officer has the authority to hire the required outside contractor. Please contact the School Director for further clarification. DSDT owns the campus grounds and if there is as problem with the physical facility, immediate notification must be made immediately to either the School Director or the Chief Operations Officer.

Lawn services, snow removal, and parking lots are maintained by the Chief Operating Officer and the School Director on a regular basis. In the event the grounds cannot be tended to, outside companies will be hired on an as-needed basis. Bicoastal Solutions is responsible for coming to DSDT no less than two days per week to handle all building maintenance, unless in the event of an emergency and an outside contractor needs to be hired. Sparkle Janitorial is responsible for cleaning the internal facility and for keeping up with the cleanliness of the institution. DSDT used Ecolab to assure the best supplies are used for disinfection and sanitation. The general maintenance and janitorial company Sparkle Janitorial are contracted to be on campus no fewer than 5 days per week. The required duties include the bathrooms, common areas, media center, classrooms, windows, floors and general grounds clean up.

DSDT School Director is responsible for developing and maintaining distance education infrastructure. The School Director works closely with the Chief Technology Officer to develop and plan for all online platforms to incorporate a seamless integration of distance education into DSDT's institution.

Equipment and Supplies

All equipment needing repairs are reported to the School Director and the School Director deems if the equipment needs repair or to be replaced. The School Director will meet with the Chief Operating Officer to see if a repair is needed or if the actual purchase of new replacement equipment is best. DSDT always ensures network functionality for both distance education and traditional means of instructional delivery by having Cronus Communication internet service as a redundant ISP in the event Xfinity Business were to have network outage.

The Director of Administration is responsible for ensuring the school has all the necessary daily operational supplies such as pens, paper, note pads, folders, files, toilet paper, water, cleaning supplies, etc. and all staff is responsible for the general clean-up of their individual areas within the facility.

Safety Standards of Instructional Supplies

Our process is to take inventory of all instructional equipment and supplies before the course begins. Instructors are tasked with testing all equipment to ensure all equipment is working effectively, and that all equipment is safe for use when being operated according to manufacturer's recommendations. If the instructor finds required material or equipment to be damaged or malfunctioning in a manner that could adversely affect the safety of students or staff, instructors are required to inform the Chief Operations Officer or School Director immediately. All equipment is inspected by instructors to verify it can be safely used in a classroom environment. Aside from this process we have a mandatory Bi-annual inspection from the City of Detroit, Buildings safety and engineering department to assess the property and analyze the Fire and safety equipment. We have our CTO that does our equipment sweeps for our maintenance and safety check once per quarter as an additional measure to ensure we have performed maintenance on computers/ all other equipment and verified all components are operational and safe to use. This is tracked through Asset Tiger also, our inventory management system.

Instructional Equipment Inventory Procedure

In the past we have rented our equipment on an as-needed basis and now we have purchased our own equipment to have available on campus, still following our guidelines, policy, and plans of the written requirements. Our process is to take inventory of all instructional equipment at the beginning and end of each course. Instructors are tasked with ensuring that the equipment used in the course is in proper working conditions. If the instructor finds that the equipment is not working properly, they are required to inform the Chief Operating Officer or School Director immediately. The inventory procedure is a "check-in" and "check-out" process utilizing a system called Asset Tiger. We house all equipment in locked cabinets that only the Program Directors have access to. In the event an instructor needs equipment for their respective class, they need to speak with one of the Program Directors on campus to have them unlock the cabinet and verify Asset Tiger has been utilized.

Emergency Purchases and Repairs of Equipment

The institution's equipment is maintained in accordance with schedules, and repairs are made on an "as-needed" basis. Should the need for an emergency purchase arise, the Administration team meets to discuss the appropriate allocation of general fund money for the purchase, acquisition, or repair of necessary equipment within a timely fashion to maintain the continuous support and instruction of the student and faculty. DSDT includes in its budget for supplies an allocation for expedited or overnight emergency supply purchases in case there is an error in the order, or we run out of supplies during the course.

Replacing and Disposing of Obsolete Equipment

DSDT has a procedure for replacing and disposing of obsolete equipment. First, we replace our equipment on an "as-needed" basis and based on industry relevancy. We avoid disposing obsolete equipment at all costs and prefer to recycle the equipment to be used as an aid in student learning. Along with recycling, we also donate our obsolete equipment to public schools or other non-profit organizations. If equipment is unusable and needs to be disposed, we take it to an authorized recycling center, or reference the physical and technical infrastructure plan for further details.

Relevant State Law

The written Operations and Maintenance plan of the physical facility is under the State of Michigan guidelines, as well as the local city of Detroit guidelines. The DSDT campus follows both and has applicable documentation to provide proof for both distance education and traditional modes of instructional delivery.

Applicable Federal Codes and Procedures

The operational federal codes for procedures and standards of operation are under the jurisdiction of the State of Michigan Licensing Department Post-Secondary School Division. The code is R 390.564 and is applicable, for instruction, equipment, and physical facility operational procedures. The Operation and Maintenance plan addresses the federal laws that are required to operate a post-secondary school through online and traditional instructional delivery. DSDT observes all the state laws as they relate to the daily operations.

EMPLOYEE GRIEVANCE POLICY AND PROCEDURES

PURPOSE OF THE PROCEDURE/INTRODUCTION

DSDT's aim is to ensure that employees with a grievance relating to their workplace can use a procedure, which can help to resolve grievances as quickly and as fairly as possible.

POLICY

Any employee who feels they have not received adequate, fair treatment in all matters related to; school policies, regulations, and procedures in accordance with the current employee handbook rights may seek consideration through a formal grievance policy.

PURPOSE

To Provide all employees with a means for impartial consideration in grievance procedures.

SCOPE

This policy applies to all employees who work at DSDT the school.

GUIDELINES AND CHAIN OF COMMAND

Stage 1: Statement of Grievance- If the employee feels that the matter has not been resolved through informal discussions with a scheduled employee/ Director of Administration, the employee should put your grievance in writing to the Chief Operations Officer or the School Director to further resolve the said issue.

Stage 2: The Grievance Meeting- whenever unresolved, the employee may request an official grievance be heard by the DSDT's school director. Employees must make a request within 3 working days of the incident.

Stage 3: The Grievance Meeting- the Director of Administration will respond, in writing, to the statement, inviting the employee to attend a meeting where the alleged grievance can be discussed. This meeting should be scheduled to take place as soon as possible and normally 5 working days-notice of this meeting will be provided to the employee and they will be informed of their right to be accompanied. Employees submitting the appeal electronically will own the responsibility of following up to make sure the grievance was received.

PROCEDURE

Employees must take all reasonable steps to attend the meeting, but if for any unforeseen reason the employee or the Director of Administration can't attend, the meeting must be rearranged. These time limits may be extended by mutual agreement.

After the meeting the Director of Administration hearing the grievance must write to the employee informing them of any decision or action and offering them the right of appeal. This letter should be sent within 10 working days of the grievance meeting and should include the details on how to appeal.

Upon receipt of the request, the grievance is taken to the DSDT Chief of Operations. The Chief of Operations will convene and review the grievance and make a decision within 5 working days.

APPEAL

If the matter is not resolved to the employees' satisfaction, they must set out their grounds of appeal in writing within 5 working days of receipt of the decision letter. Within 10working days of receiving an appeal letter, the employee should receive a written invitation to attend an appeal meeting. The School Director should take the appeal meeting not involved in the original meeting. After the appeal meeting with the School Director, the Director must inform the employee in writing of their decision within 10 working days of the meeting. Their decision is final.

If conflict is still without resolve, please contact:

Council on Occupational Education, 7840 Roswell Road, Building 300, Suite 325, Atlanta, GA 30350, Telephone: 770-396-3898 / FAX: 770-396-3790, www.council.org.

Or

State of Michigan Department of Licensing and Regulatory Affairs (LARA) P.O. Box 30018 Lansing, MI 48909 Phone Main Line: 517-241-7000 Fax: 517-373-2162

Email: CSCL-Complaints@michigan.gov Website:

http://www.michigan.gov/documents/lara/Post-Secondary_Student_Complaints_498839_7.pdf 24

EMPLOYEE GRIEVANCE FORM

Name of Complainant:	
Address:	
Phone Number:	
Please provide a one or two sentence description of your complaint.	
2. Please describe the nature of your complaint in full detail indicating what happened, we event occurred and who was involved. If additional space is needed, use the reverse side	
3. Indicate when and with whom you have already spoken regarding this grievance and vattempts have been made toward resolution.	what
4. Indicate what specific resolution you are seeking or recommending.	
*I hereby certify that the statements made pertaining to my complaint are truthful and ac	curate.
EMPLOYEE SIGNATURE DATE	

STUDENT GRIEVANCE POLICY AND PROCEDURES

PURPOSE OF THE PROCEDURE/INTRODUCTION

DSDT's aim is to ensure that students with a grievance relating to their education or attendance can use a procedure, which can help to resolve grievances as quickly and as fairly as possible.

POLICY

Any Student who feels they have not received adequate, fair treatment in all matters related to; school policies, regulations and procedures in accordance with the current student handbook and student bill of rights may seek consideration through a formal grievance policy.

PURPOSE

To Provide all students with a means for impartial consideration in grievance procedures.

SCOPE

This policy applies to all students enrolled in the DSDT school no matter the program of study.

GUIDELINES AND CHAIN OF COMMAND

Stage 1: Statement of Grievance- If the student feels that the matter has not been resolved through informal discussions with scheduled instructor/ student meetings, the student should put their grievance in writing to the Director of Administration to further resolve the said issue. Stage 2: The Grievance Meeting whenever unresolved, the student may request an official grievance be heard by DSDT's Chief of Operations Director. The student must make a request within 3 working days of the incident.

Stage 3: The Grievance Meeting- the Director of Administration will respond, in writing, to the statement, inviting the student to attend a meeting where the alleged grievance can be discussed. This meeting should be scheduled to take place as soon as possible and normally 5 working days-notice of this meeting will be provided to the student and they will be informed of their right to be accompanied. Students submitting the appeal electronically will own the responsibility of following up to make sure the grievance was received.

PROCEDURE

Students must take all reasonable steps to attend the meeting, but if for any unforeseen reason the student or the Chief of Operations Director can't attend, the meeting must be rearranged. Should a student companion and or parent/custodial guardian be unable to attend, then the student must make contact within 10 days of the date of the letter to arrange an alternative date that falls within 15 days of the original date provided. These time limits may be extended by mutual agreement. After the meeting, the Chief of Operations Director hearing the grievance must write to the student informing them of any decision or action and offering them the right of appeal.

This letter should be sent within 10 working days of the grievance meeting and should include the details on how to appeal. Upon receipt of the request, the grievance is taken to the DSDT School Director. The School Director will convene and review the grievance and make a decision within 5 working days.

APPEAL

If the matter is not resolved to the students' satisfaction, they must set out their grounds of appeal in writing within 5 working days of receipt of the decision letter. Within 10 working days of receiving an appeal letter, the student should receive a written invitation to attend an appeal meeting. The School Director should take the appeal meeting not involved in the original meeting. After the appeal meeting with the School Director, the School Director must inform the student in writing of their decision within 10 working days of the meeting. Their decision is final.

If conflict is still without resolve, please contact: Council on Occupational Education 7840 Roswell Road, Building 300, Suite 325 Atlanta, GA 30350 Telephone: 770-396-3898 / FAX: 770-396-3790 www.council.org.

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Email: CSCL-Complaints@michigan.gov

Website:

http://www.michigan.gov/documents/lara/Post-Secondary_Student_Complaints_498839_7.pdf 24

STUDENT GRIEVANCE FORM

Name of Complainant:	
Address:	
Student Name:	
Phone Number:	
1. Please provide a one or two sentence description of you	•
2. Please describe the nature of your complaint in full de event occurred and who was involved. If additional space	etail indicating what happened, when the se is needed, use the reverse side.
3. Indicate when and with whom you have already spoke attempts have been made toward resolution.	en regarding this grievance and what
4. Indicate what specific resolution you are seeking or re	
*I hereby certify that the statements made pertaining to 1	
STUDENT SIGNATURE	DATE

STANDARDS FOR SAFEGUARDING CUSTOMER INFORMATION

Upon signing a Program Participation Agreement (PPA), DSDT agreed to comply with the Family Educational Rights and Privacy Act (FERPA), the U.S. Department of Education's implementing regulations at 34 C.F. R. Part 99, and the Standards for Safeguarding Customer Information, 16 C.F.R. Part 314, issued by the Federal Trade Commission (FTC), as required by the Gramm-Leach-Bliley (GLB) Act, P.L. 106-102. DSDT is responsible for complying with the limitations on the disclosure of PII in students' education records under FERPA and is subject to Sections 501 and 505(b)(2) of the GLB Act.

The GLB Act, also known as the Financial Services Modernization Act of 1999 (Public Law # 106-102, 113 Statute 1338), regulates the collection, disclosure, and protection of consumers' nonpublic personal information or personally identifiable information (PII) by financial institutions. Section 501 of GLB Act established the following information security standards for financial institutions: DSDT shall establish appropriated standards for DSDT relating to administrative, technical, and physical safeguards-

- (1) To ensure the security and confidentiality of students and employees records and information
- (2) To protect against any anticipated threats or hazards to the security or integrity of such records; and
- (3) To protect against unauthorized access to or use of such records or information which could result in substantial harm or inconvenience to any student or employee.

Program Objectives:

The objectives of this Information Security Program ("Program") are as follows:

- Ensure the security and confidentiality of DSDT students' and employee's information.
- Protect against any anticipated threats or hazards to the security and/or integrity of the institution's Student's and employee's information.
- Protect against unauthorized access to or use of the Institution's students and employee's information that could result in substantial harm or inconvenience to any customer.

Statement of Purpose

The plan is to protect the alteration or destruction or other compromise and is in place to execute the safeguards in place minimizing and negating the risks in the following operations within our organization including:

Responsibilities: DSDT has implemented reasonable expectations that are readily accessible and are designed to achieve the objectives mentioned above. The persons within DSDT responsible for the information security program are management and the Information Technology Lead (ITL) within our organization. The ITL manages the majority of the operations in regard to the internal and external risks that may compromise the security and confidentiality of customer information. The ITL at DSDT, designs, manages and implements information safeguards ultimately controlling the risks to our organization. The way this is done is through regularly testing or otherwise monitoring the effectiveness of our safeguarding procedures within our control systems. The ITL at DSDT will also ensure the oversight of all other service providers contracted or hired, by maintaining and retaining only qualified individuals or companies capable of safeguarding customer information. The ITL at DSDT will evaluate on a quarterly basis and adjust DSDT's information security program as needed in lieu of test results from the continual monitoring of safeguards. In the event we believe we may have a material impact on any information whether digital or print, we will alter

our plan to accommodate. Any breaches of this program must be reported immediately to the School's Director or Chief Operations Officer at 313-263-4200, in order to assess the potential damage such breach may impose on our affected customer. Steps will be taken to re-secure information and any affected systems will be examined to ensure future compliance. In the event the Information Technology Lead or the direct management leaves the employment of the Institution, the School Director or Chief of Operations, shall take over the responsibilities of the Information Technology Lead, until a new Technology Lead is designated.

Procedures

- 1. All records containing customer information shall be stored and maintained in a secure area.
 - Paper records are stored in a fire-proof safe, in a locked room, that is locked when unattended. The School Director/ Chief of Operations and ITL control access to such areas.
 - All storage areas are protected against destruction or potential damage from physical hazards, like fire or floods and are kept in fire-proof safes.
 - Electronic customer information is stored on secure servers. Access to such information is password controlled, and the ITL shall controls access to the internal servers.
 - Student and employee information consisting of financial or other similar information (e.g., social security numbers, etc.) are not be stored on any computer system with a direct Internet connection.
 - All customer information is backed up on a [daily] basis. Such back up data is stored in a secure location as determined by the ITL.
- 2. All electronic transmissions of student and employee information, whether inbound or outbound, are performed on a secure basis.
 - Social Security, IRS information, or other sensitive financial data transmitted to DSDT directly from students shall use a secure connection, such as a Secure Sockets Layer (SSL) or other currently accepted standard, so that the security of such information is protected in transit. Such secure transmissions are automatic. Students are advised against transmitting sensitive data, like social security, via electronic mail.
 - DSDT requires by contract that inbound transmissions of student information delivered to DSDT via other sources be encrypted or otherwise secured.
 - All outbound transmissions of student information is secured in a manner acceptable to the ITA.
 - To the extent sensitive data must be transmitted to DSDT by electronic mail, such transmissions are password controlled or otherwise protected from theft or unauthorized access at the discretion of the ITA.
 - The ITA and third-party service reviews all students' applications to ensure an appropriate level of security both within DSDT and with the Institution's business third party server and IRS.
- 3. All paper transmissions of customer information by DSDT are performed on a secure basis.
 - Sensitive student information is always properly secured.
 - Student information delivered by DSDT to third parties is always kept sealed.
 - Paper-based student information is never left unattended in an unsecured area.
- 4. All student information is disposed of in a secure manner.
 - The ITA supervises the disposal of all records containing student information.

- Paper based student information is shredded and stored in a secure area until a disposal or recycling service picks it up.
- All hard drives, diskette, magnetic tapes, or any other electronic media containing student information shall be erased and/or destroyed prior to disposing of computers or other hardware. All hardware is effectively destroyed.
- All student information is disposed of in a secure manner after any applicable retention period.
- 5. The ITA maintains an inventory of Institution computers, including any handheld devices or PDAs, on or through which student information may be stored, accessed or transmitted.
- 6. The ITA develops and maintain appropriate oversight or audit procedures to detect the improper disclosure or theft of student information.

Definitions

As used in the Gramm-Leach-Bliley Act, "customers" include those to whom DSDT provides financial services of any kind. For the purposes of this Safeguarding Program, "customer information" is defined as any record containing non-public, personally identifiable financial information regarding any of the School's customers, whether such records are maintained on paper, electronically or by any other means, this Security Program, in and of itself, does not create a contract between the student and any person or entity

Applicability

This Information Security Program applies to all DSDT departments with access to student loandata or other customer information regardless of the purpose or frequency of use and applies to the gathering, storing, processing, transmitting and disposing of customer information. This Program also applies to outside service providers, such as loan servicing agents and collection agencies to which student loan data may be transferred or who may gather it on behalf of the School.

Information Security Policies and Procedures

Detecting, Preventing and Responding to Attacks, Intrusions or Other Systems Failures In keeping with the objectives of the Program, DSDT implements, maintain and enforce the following attack and intrusion safeguards:

Campus Café, DSDT's educational management software.

Boston Educational Network, a school interface that is encrypted. The school must be secured with a unique logon ID and password for access to systems.

- The ITA ensures DSDT has adequate procedures to address any breaches of the Institution's
 information safeguards that would materially impact the confidentiality and security of customer
 information. The procedures shall address the appropriate response to specific types of breaches,
 including hackers, general security compromises, denial of access to databases and computer
 systems, etc.
- 2) The ITA utilizes and maintains a working knowledge of widely available technology for the protection of student information.
- 3) The ITA communicates with the Institution's computer vendors from time to time to ensure that DSDT has installed the most recent patches that resolve software vulnerabilities.

- 4) DSDT utilizes anti-virus software that updates automatically.
- 5) DSDT maintains up-to-date firewalls.
- 6) The ITA manages the Institution's information security tools for employees and pass along updates about any security risks or breaches.
- 7) The ITA establishes procedures to preserve the security, confidentiality and integrity of student information in the event of a computer or other technological failure.
- 8) The ITA ensures that access to student information is granted only to legitimate and valid users.
- 9) The ITA notifies students promptly if their student information is subject to loss, damage or unauthorized access.

Information Technology Lead

DSDT has implemented reasonable expectations that are readily accessible and are designed to achieve the objectives mentioned above. The persons within DSDT responsible for the

The plan is to protect the alteration or destruction or other compromise and is in place to execute the safeguards in place minimizing and negating the risks in the following operations within our organization including:

- 1. Employee Training and Management
- 2. Information systems, including network and software design, as well as information processing, storage, transmission and disposal; and
- 3. Detecting, preventing and responding to attacks, intrusions, or other systems failures.

The ITL at DSDT, designs, manages and implements information safeguards ultimately controlling the risks to our organization. The way this is done is through regularly testing or otherwise monitoring the effectiveness of our safeguarding procedures withinour control systems. The ITL at DSDT will also ensure the oversight of all other service providers contracted or hired, by maintaining and retaining only qualified individuals or companies capable of safeguarding customer information.

The ITL at DSDT will evaluate on a quarterly basis and adjust DSDT's information security program as needed in lieu of test results from the continual monitoring of safeguards. In the event we believe we may have a material impact on any information whether digital or print, we will alter our plan to accommodate.

Compliance Procedures

In each affected area, the ITL will identify and assess all levels of risk to DSDT customers and implement the following procedures to ensure compliance. It is the responsibility of the ITL to evaluate and assess the risks of any changes made with regard to services offered, implementation of new procedures, policies or services and to make the necessary changes and/or adjustments to ensure continued compliance.

Within each area, the ITL will regularly monitor and test this Program to ensure compliance and make all necessary changes as required by the results of such testing and monitoring. Employeeswill remove customer information from desktops and any areas of public access such as counters, the top of file cabinets, tables, printers, copiers and FAX machines. Offices containing customer information will be locked at night and access to offices engaged in the provision of financial services such as Student Loans, Collections, Student Accounting Services and Financial

Assistance will be restricted to authorized personnel only. All promissory notes will be stored in locked, fireproof file cabinets in restricted-access, locked storage rooms where Student Loan files are stored.

With respect to electronic data, customer information shall be protected by this Information Security Program, including provisions regarding password confidentiality, the periodic changing of passwords, restriction of access to personal computers and elimination of storage of customer information on generally accessible machines. Care will be taken to ensure the protection of all information disseminated by FAX, data transferred electronically, and data stored online.

The Family Educational Rights and Privacy Act (FERPA), the Fair Debt Collection Practices Act (FDCPA) and other laws governing the dissemination of information to third parties will be appropriately enforced. Designated personnel will monitor compliance, evaluate the effectiveness of this Information Security Program and collaborate with other DSDT officials in implementing any needed adjustments to this Program. Outside service providers will be required by contract to implement and monitor safeguards sufficient to protect customer information as required by the Gramm-Leach-Bliley Act. The sale, lease, license or other distribution of customer information, including lists, abstracts and summaries of any kind is strictly prohibited.

Disposal

DSDT requires the shredding of all paper containing any customer information prior to disposal. In the event of any recycling of personal computers containing customer information, all memory components of such computers will be completely reformatted or otherwise erased for any new use as determined by the department.

System Failures

In order to prevent breaches of this Program, assigned personnel will test data security systems governed by this Program for weaknesses, monitor performance of service providers and conduct physical security analyses of both electronic and hardcopy records. This will ensure that all Program goals are being met and that DSDT customers can be secure in the knowledge that their personal financial information is protected.

Any breaches of this program must be reported immediately to the School's Director or Chief Operations Officer at 313-263-4200, in order to assess the potential damage such breach may impose on our affected customer. Steps will be taken to re-secure information and any affected systems will be examined to ensure future compliance.

Ouestions

Questions regarding the Gramm-Leach-Bliley Act, the Fair Debt Collection Act and Family Educational Rights and Privacy Act should be referred to the Director of Admissions at 313-263-4200.

Questions regarding the DSDT Information Security Policy should be referred to the Information Technology Lead at 313-263-4200.

Frequently Asked Questions about Cybersecurity Compliance

Who needs to worry about data security?

Data security affects everyone at a postsecondary institution (PSI) from the president to applicants. No one is exempt from data security, and each person has a role in ensuring data security.

Why do I need to worry about data security?

You should worry about data security for three reasons. First, the educational sector has an initial level of security maturity, as assessed by Gartner, which results in high risk and low cybersecurity maturity. Second, the educational sector is a rich trove of email addresses and credentials, financial information, research, and development. Third, PSIs that distribute Title IV funds have entered into agreements with FSA via a Program Participation Agreement (PPA) and a Student Aid Internet Gateway (SAIG) Agreement. Those agreements include stipulations about safeguarding data.

What are data security requirements?

Title IV PSIs are financial institutions per the Gramm-Leach-Bliley Act (GLBA, 2002). Per the Federal Student Aid (FSA) Program Participation Agreement (PPA) and the Student Aid Internet Gateway (SAIG) Agreement, PSIs must have GLBA safeguards in place. PSIs without GLBA safeguards may be found administratively incapable (unable to properly administer Title IV funds). GLBA safeguards require institutions to:

- develop, implement, and maintain a documented data security program;
- designate an employee or employees to coordinate the program;
- identify reasonably foreseeable internal and external risks to data security via formal, documented risk assessments of:
 - o employee training and management;
 - o information systems, including network and software design, as well as information processing, storage, transmission, and disposal; and
 - o the ability to detect, prevent, and respond to attacks, intrusions, or other systems failures;
- control the risks identified, by designing and implement information safeguards and regularly test/monitor their effectiveness;
- oversee service providers by
 - o taking reasonable steps to select and retain service providers that can maintain appropriate safeguards for the FSA, student, and school (customer) information at issue; and
 - o requiring your service providers by contract to implement and maintain such safeguards; and
- evaluate and adjust your school's data security program considering
 - o the results of the required testing/monitoring,
 - o any material changes to your operations or business arrangements, and
 - o any other circumstances that you know may have a material impact on your information security program.

Further, Title IV schools are subject to the requirements of the Federal Trade Commission Identity Theft Red Flags Rule ("Red Flags Rule") (72 Fed. Reg. 63718) issued Nov. 9, 2007. The Red Flags

Rule requires an institution to develop and implement a written identify theft prevention program to detect, prevent, and respond to patterns, practices, or specific activities that may indicate identity theft.

What is a breach?

Per GLBA, PSIs must protect against any unauthorized disclosure, misuse, alteration, destruction, or other compromise of information, such as unauthorized access. The Department of Education and Federal Student Aid considers each of these a breach. Each PSI must have in place administrative, technical, and physical safeguards which:

- ensure the security and confidentiality of customer information,
- protect against any anticipated threats or hazards to the security or integrity of such records, and
- protect against unauthorized access to or use of such records or information which could result in substantial harm or inconvenience to any customer.

When do I report a breach?

The Student Aid Internet Gateway (SAIG) Agreement requires that as a condition of continued participation in the federal student aid programs, PSIs report actual data breaches, as well as suspected data breaches. Title IV PSIs must report on the day that a data breach is detected or even suspected. The U.S. Department of Education (the Department) has the authority to fine institutions—up to \$54,789 per violation per 34 C.F.R. § 36.2—that do not comply with the requirement to self-report data breaches. The Department has reminded all institutions of this requirement through Dear Colleague Letters (GEN 15-18, GEN 16-12), electronic announcements, and the annual FSA Handbook.

How do I report a breach?

To report a breach, email cpssaig@ed.gov. Your email should include:

- date of the breach (known or suspected),
- impact of the breach (number of records, number of students, etc.), method of the breach (hack, accidental disclosure, etc.),
- information security program point of contact (email address and phone number are required),
- remediation status (complete, in-process, etc. with detail), and
- next steps (as needed).

If you cannot email, you should call the Department's security operations center (EDSOC) at 202-245-6550 to report the data listed above. EDSOC operates 24 hours a day, seven days per week.

We recently heard in an FSA conference session that we can no longer accept faxed or emailed copies of taxes or tax transcripts. Is this the case?

Are we permitted to accept such documents via a student's school email account?

PSIs should never solicit personally identifiable information (PII)—especially sensitive personally identifiable information (SPII)—through means that are known to be insecure. PSIs should review their information requests and guidance to students and parents to ensure that instructions are clear about the explicit protection of data and how to transmit data securely transmittal.

PSIs must have secure means to receive inbound PII and SPII from students and parents. Secure means could include an appropriately safeguarded fax, a secure web portal to upload data and documents, student email accounts that encrypt communications to at least an AES-256-bit level, or

separately encrypted attachments that are password protected (with the password provided in a separate email).

PSIs must remediate all data breaches. A data breach could be created if a student or parent sends PII or SPII via unsecure means, which would allow PII or SPII to be accessible by individuals who do not have a need to know.

PSIs must remediate this type of data breach immediately each time it occurs. However, at this time, this type of data breach does not need to be reported as an institutional data breach to FSA.

How can students or parents create an encrypted attachment to send to a PSI?

There are many applications that have the ability to encrypt attachments. An example is provided below for WinZipTM, with the caveat that this is not the only acceptable method, and unless very carefully configured, WinZip would not fit the Federal Information Processing Standard (FIPS) which is defined by FIPS 140-2. The minimum acceptable encryption is AES 256- bit for PSIs.

WinZip instructions for file/folder encryption and password protection:

- 1) Open a folder to the location of the file(s)/folder(s) that you wish to encrypt.
- 2) Select the file(s)/folder(s) that you wish to encrypt. Note that in order to select more than one file/folder, you must press the "Ctrl" key on the keyboard while selecting them.
- 3) Right-click over one of the selected items.
- 4) Select WinZip. From the submenu that appears, select "Add to Zip File."
- 5) In the "Add Files" dialog box, specify a 'File name' and 'Destination' (location) for the finished Zip file.
- 6) Select ". Zip" as the Compression Type.
- 7) Under Encryption, check the "Encrypt files" box.
- 8) Click the "Add" button.
- 9) A pop-up window may appear saying "You should be aware of the advantages and disadvantages of the various encryption methods before using this feature. Please press the F1 key for more information, particularly if this is the first time you are using encryption." Select the "OK" button to continue.
- 10) In the "Enter Password" field, enter an appropriate password. Passwords must be at least eight characters and must contain at least one of each the following: a lowercase character (a-z), an uppercase character (A-Z), a number character (0-9), and a symbol character (!, @, #, \$, %, ^, &, *, etc.).
- 11) In the "Re-enter Password" field, enter the same password from Step #10, and remember the password for future reference.
- 12) Click the "OK" button.
- 13) A pop-up window may appear saying "Add Complete. Your files have been added. The files will be compressed and encrypted when saved." Click the "OK" button to continue.
- 14) The encrypted WinZip file should be in the location identified in Step #5 above.
- 15) The password must not be included in the same message and should either be included in a separate email or verbally provided to the intended user.

What if we have the documents faxed? Our fax has documents going straight to the document imaging/storage area on a server. Paper does not print. Is this an acceptable practice? Can a fax in-transmission be hacked?

Faxing, if safeguarded, is not a breach. It is assumed that a PSI has already performed a risk assessment and has secured access to the physical server. It is a further assumption that technical and logical controls are in place that would prevent individuals without a need to know (for example,

system Representatives) from viewing PII or SPII.

More specifically, faxes arriving securely would depend on the method of how it arrives. If the fax is printed upon arrival from a fax machine or if the fax is transmitted to a server, physical and administrative safeguards must ensure the data are only viewed or handled by authorized personnel with a need to know. Confidentiality and integrity are each key whether it is physical or digital. The fax-hack question is substantively different. A lot would depend on if your institution is leveraging a Private Branch Exchange (PBX) or if it is a straight Signaling System 7 (SS7) connection to the standard Public Switched Telephone Network (PSTN). Physical or logical access to the PBX on your campus or cloud has the potential for breach, as well physical access to your PSTN equipment. Any of these could potentially cause a breach in the confidentiality of the data. However, as a PSI, your team should do a risk assessment of your technology design and handling process to review where risks exist and put in the appropriate controls or compensating controls. You also should document your risks and controls in your information security program document. Examples include putting the fax machine (PTSN connection, physical print-out type that is the nonnetworked standard) in a controlled space that only authorized personnel can access. For the hack risk, you might inspect from the demarcation point to the device regularly to ensure no interception evidence. You may further document the security controls inherited via your ILEC/CLEC (telephone service carrier). Regular testing also should be documented to show that your PSI has given this thoughtful consideration.

SECTION THREE

ADMISSIONS

ADMISSIONS POLICY AND PROCEDURES

ADMISSION REQUIREMENTS

DSDT admits as regular students, those who are high school graduates, or holders of high school graduation equivalency certificates (GED'S). DSDT does not accept ability to benefits (ATB) students at this time. DSDT is an equal opportunity employer and follows the same policies in accepting applications from potential students. All high school diplomas and GED's are verified by an Admissions Representative to establish the validity of the document. Self-certification is not enough documentation and there is no available appeal process at this time. If DSDT is unable to validate or accept the high school diploma, you will not meet the admissions requirements and will not be able to attend DSDT.

ADMISSION PROCEDURE

- Speak with an Admissions Representative
- Tour the Facility

APPLICATION FEE

There is no application fee associated with the processing of an incoming student enrollment.

APPLICATION PROCESS

• Complete a Pre-Enrollment Application Form: Complete and submit the application form to the secure online portal system, Campus Café, prior to registration. All forms whether needed from the student or from the Director of Admissions will be uploaded into the students' individual portal.

Individuals receiving Title IV funds will need to complete all requirements listed above and must attend a personal interview with a Financial Aid Representative. A telephone interview may be considered if the applicant's geographical location and ability to travel to the interview site is a hardship.

ACCEPTANCE

- 1. Attend Orientation via (online or in-person) After a prospective student has completed the preenrollment application process and has been through the initial screening, the Admissions Representative will review the applicant. If they meet the requirements, the applicant will be reviewed by the Director of Admissions and the Director of Student Services and scheduled for orientation. Applicants must complete an in-person or online orientation with the Admissions Team prior to acceptance.
- 2. Applicants must provide the following verification documents:
 - 1. High school diploma, high school transcripts, or GED,
 - 2. And current driver's license, state approved ID, or picture ID with social security card or birth certificate

Note: We are required to verify your proof of education is from a valid high school or GED program.

Admission Requirements for Students with a High School Diploma are as follows:

- 1. Proof of Age Applicants who are not 18 years of age prior to their desired start date at DSDT may apply at the age of 17 with parental permission.
- 2. Students must also be able to provide proof of appropriate educational requirement such as;
 - High school diploma
 - Homeschooling Though homeschooled students are not considered to have a <a href="https://histor.com/histor.c
 - Foreign High School diploma or transcript Note: The high school diploma or transcript requirement can also be from a foreign school if it is equivalent to a U.S. high school diploma; Documentation of proof of 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.)
 - Recognized equivalents of a high school diploma- The Department of Education recognizes several equivalents to a high school diploma:
 - A GED certificate;
 - A certificate or other <u>official completion</u> documentation demonstrating that the student has passed a state-authorized examination (such as the Test Assessing Secondary Completion (TASC) the High School Equivalency Test (Hi SET), or, in California, the California High School Proficiency Exam) that the state recognizes as the equivalent of a high school diploma (note that certificates of attendance and/or completion are **not** included in this qualifying category)
 - **For Veterans only:** As an alternative document you may submit a copy of DD Form 214 Certificate of Release or Discharge from Active Duty to verify a student's high school completion if it indicates that the individual is a high school graduate or equivalent.
- 3. Complete Enrollment Contract & Enrollment Documentation Once orientation is completed, the prospective student will receive a copy of the student handbook along with a copy of the enrollment contract and information covering costs and payment plans prior to the beginning of class attendance. DSDT clearly outlines the obligation of both the school and the student in the enrollment contract. When the student has completed all the necessary requirements, he/she receives an acceptance letter and will be placed into the respective program of study. Note: All applicants must go through the entire enrollment application process (detailed in the catalog, online publication, and on the enrollment application).

ENROLLMENT INFORMATION

DSDT is on a continuous enrollment schedule, depending upon space availability. Please refer to the tuition and course schedule or contact DSDT for exact start dates, holidays and school closures: DSDT allows the following holidays off: New Year's Day, Dr. Martin Luther King Jr., Memorial and Independence, Labor Day, Thanksgiving and December 24th and 25th.

PAYMENT SCHEDULE

DSDT offers a variety of monthly financial payments schedules. See a DSDT Admissions Representative or Financial Aid Representative for details.

ALCOHOL AND DRUG POLICY

DSDT's full policy can be found in the updated Consumer Info at a Glance guide, listed on DSDT's website and in print throughout the institution in the "Policy and Procedure" Master Handbook.

STUDENTS CONVICTED OF POSESSION OR SALE OF DRUGS

Federal Penalties for Drug Violations According to the U.S. Department of Education Office of National Drug Control Policy.

- 1. Period of ineligibility for Federal Student Aid Funds: **Possession** of Illegal Drugs
 - (a) Only one time for possession of illegal drugs 1 year of ineligibility to receive Title IV funds after date of conviction
 - (b) Two times for possession of illegal drugs 2 years of ineligibility to receive Title IV funds after date of the second conviction
 - (c) Three or more times for possession of illegal drugs- ineligible to receive Title IV funds for an indefinite period after date of the third conviction
- 2. Period of ineligibility for Federal Student Aid Funds: **Sale** of Illegal Drugs
 - (a) Only one time for the sale of illegal drugs 2 year of ineligibility to receive Title IV funds after date of conviction
 - (b) Two times for the sale of illegal drugs ineligible to receive Title IV funds for an indefinite period after date of the second conviction

*Note: Under the law, an indefinite period of ineligibility continues unless the conviction is overturned or otherwise rendered invalid or the student meets one of the two early reinstatement requirements specified above.

If a student successfully completes a drug rehabilitation program after the student's most recent drug conviction, the student regains eligibility on the date the student successfully completes the program. Students may regain eligibility the day after the period of ineligibility ends or when he or she successfully completes a qualified drug rehabilitation program. Beginning with the 2010-11 academic year, passing two unannounced drug tests given by a qualified drug rehabilitation program will be acceptable to regain eligibility.

A Drug Rehabilitation program is as follows:

- Includes at least two unannounced drug tests; and
- Has received or is qualified to receive funds directly or indirectly under a Federal, State, or local government program; Is administered or recognized by a Federal, State, or local government agency or court; Has received or is qualified to receive payment directly or indirectly from a Federally- or State-licensed insurance company; or Is administered or recognized by a Federally- or Statelicensed hospital, health clinic or medical doctor.

ADMISSIONS AND RECRUITING

Any changes to these publications, rules of admissions, contract enrollment agreements and or any printed admissions information will be given to all current, prospect and future students in a timely manner.

TRANSFER STUDENT POLICY

DSDT does not accept transfer credits at this time. If you are a Title IV recipient, we do recognize credits obtained from a previous school for similar programs of study and/ or for coursework completed at another institution.

A student who has obtained clock hour credit from a previous school for a similar program of study and/ or for coursework completed at another institution, is classified as a transfer student.

Applicants must submit transcripts from all schools attended prior to admission to DSDT.

A transfer student may be admitted to the program upon verification of previous hours and the state board transfer requirements. Transfer hours are recorded on the student's permanent record.

Decisions concerning the acceptance of transfer hours are at the discretion of the Director of Admissions. In addition, the student will be charged based on the current tuition rate.

The new 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:

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

TRANSFER STUDENT POLICY

Responsibilities of the following parties:

Student Applicant

Apply for Financial Aid

Step 1

Visit DSDT for verification that you have met the criteria for admission.

Step 2

Set up your appointment with the Administrator for an interview.

Step 3

After all documents have been received and reviewed for completeness, you will be contacted for acceptance. You are now ready for enrollment. At this appointment, you will attend orientation, sign your enrollment agreement

Institutional Refund Policy

Institutional Refund Policy (For both Withdrawn and Dismissed Students) Non-Title IV Eligible Programs

Refund Policy (For both Withdrawn and Dismissed Students) Non-Title IV, HEA Eligible Programs

Tuition Costs

Vary based on the type of program selected. No deposit per program start date is due upon receiving your acceptance from DSDT. Tuition must be paid in full two weeks prior to the start of the program. If your program begins in less than two weeks, 100% of your course cost must accompany your signed enrollment agreement. There will be a \$25.00 charge for returned checks and for credit card disputes.

Cancellation Policy

We reserve the right to cancel any class, with or without reason, any time prior to the first day of class. All tuition monies paid by students will be refunded if a class is cancelled. Cancellation notices will only be given to students who have already registered and paid for the class. Class dates, times, and prices are subject to change at any time. Any changes that affect a student contract will be revised, and both the student and the school will have to sign the new contract.

Refunds for Classes Canceled by the Institution

If tuition and fees are collected in advance of the start date of a program and the institution cancels the class, 100% of the tuition and fees collected must be refunded. The refund shall be made within 45 days of the planned start date.

Refunds for Students Who Withdraw on or Before the First Day of Class

If tuition and fees are collected in advance of the start date of classes and the student does not begin the program or withdraws on the first day of class, no more than \$100 of the tuition and fees may be retained by the institution. Appropriate refunds for a student who does not begin classes shall be made within 45 days of the class start date.

Refunds for Students Enrolled Prior to Visiting the Institution

Students who have not visited the school facility prior to enrollment will have the opportunity to withdraw without penalty within three days following either attendance at a regularly scheduled orientation or following a tour of the facilities and inspection of the equipment.

Refunds for Students Enrolled in Professional Development, Continuing Education, or Limited Contract Instruction

Institutions engaging in programs, which are short-term, must have a written policy or contract statement regarding whether or not fees and instructional charges are refundable.

Refunds for Withdrawal after Class Commences

The refund policy for a student attending a non-public institution who incurs a financial obligation for a period of 12 months or less shall be as follows:

Financial Obligation (based on payment period)	Institutional Refund
00.00%-10%	90%
10.01%-25%	50%
25.01%-50%	25%
50.01%-100%	0%

REFUND POLICY - NOTICE OF CANCELLATION

For applicants who cancel enrollment or students who withdraw from enrollment, a fair and equitable settlement will apply. The following policy will apply to all terminations for any reason, by either party, including student decision, program cancellation, or school closure.

Any monies due to the applicant or students shall be refunded within 45 days of official cancellation or withdrawal. Official cancellation or withdrawal shall occur on the earlier of the dates that:

- 1. Applicant is not accepted by the school: The applicant shall be entitled to a refund of all monies paid.
- 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 or not the student has actually started classes.
- 3. 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.
- 4. A student notifies the institution of his/her withdrawal in writing. In this case, a student will be refunded based on the percent of scheduled time.
- 5. A student withdraws during a leave of absence. The date of determination is the date they officially withdraw. If the student does not return from a leave of absence, the date of determination is the date they were scheduled to return.
- 6. A student is expelled by the school: (Unofficial withdrawals will be determined by the institution by monitoring attendance at least every 30 days.)
- 7. In type 2, 3, 4 or 5, official cancellations or withdrawals, the cancellation date will be determined by the postmark date on the written notification, or the date the notification is delivered to the Director of Administration.

For students who enroll and begin classes but withdrawal prior to course completion (after three business days of signing the contract), the following schedule of tuition earned by the school applies:

Percent Of Scheduled Time Total Tuition School Enrolled To Total Course/Program Shall Receive/Retain

*Note: All refunds are based on scheduled hours.

.01% to 04.9%	20%
.05% to 09.9%	30%
10% to 14.9%	40%
15% to 24.9%	45%
25% to 49.9%	70%
50% to 100%	100%

All refunds will be calculated based on the student's last date of attendance. Any monies due a student who withdraws shall be refunded within 45 days of the date of determination that a student has withdrawn, whether officially or unofficially. In the case of disabling illness or injury, death in the student's 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. If the course is cancelled subsequent to a student's enrollment, the school will either provide a full refund of all monies paid or completion of the course at a later time.

Institutional Refund Procedure

Policy: See above refund institutional policy

Purpose: To ensure students are awarded refunds based on the policy of the

institution.

Responsibilities:

Admissions representative

Alerts the business office that the perspective student chooses not to enroll within the timeframe of the 3 days allotted

Business Office

- Will refund the amount paid within to the prospective student
- Notify the student in writing the amount of the refund
- Document refund on the student ledger
- Refund amount to student

Monies owed to the school is calculated on a withdrawal form based on actual hours spent in the classroom. (see above policy

LEAVE OF ABSENCE POLICY AND PROCEDURE

An authorized leave of absence (LOA) is a temporary interruption in a student's program of study. LOA refers to the specific time-period during a program when a student is not in attendance. A LOA is not required if a student is not in attendance only for an institutionally scheduled break. However, a scheduled break may occur during a LOA.

A LOA must meet certain conditions to be counted as temporary interruption in a student's education instead of being counted as a withdrawal requiring an institution to perform a refund calculation. For a student at DSDT to be approved for a Leave of Absence whether for medical or personal reason, the following conditions must be met:

The school's policy for a Leave of Absence (LOA) requires a student to submit a request in writing.

The written request must contain the dates for the leave and the reason for the request and include the student's signature.

The LOA together with any additional leaves of absence must not exceed a total of 180 days in any 12- month period.

The school's policy requires a student to apply in advance for a LOA unless unforeseen circumstances (emergency) prevent the student from doing so. For example, if a student were injured in a car accident and needed a few weeks to recover before returning to school, the student would not have been able to request the LOA in advance.

The school may grant an LOA to a student who did not provide the request prior to the LOA due to unforeseen circumstances if the school documents the reason for its decision and collects the request from the student at a later date either via mail, email, fax, an authorized individual or in person. In this example, the beginning date of the approved LOA would be determined by the school director/administrator to be the date the student was unable to attend school because of the accident.

The request for Leave of Absence Form is made available in the Student Handbook & Catalog. A student granted a LOA that meets these criteria is not considered to have withdrawn, and no refund calculation is required at that time. For the Leave of Absence to be approved, there must be a firm and clear reasonable expectation that the student will return from the LOA. If it is determined that the student has no intention of returning, refer to the Withdrawal Policy. The student's contract will be extended by the same number of days taken in the LOA. Changes to the contract period on the enrollment agreement must be initiated by all parties. If the student does not return the withdrawal date for the purpose of calculating a refund is always the student's last day of attendance.

When the student returns from a LOA, the student's education will continue from the actual hours earned. The start and ending date will be adjusted accordingly.

Please note that any student who fails to return to the school at the end of an approved leave of absence is considered to have withdrawn from the school.

Students who do not follow the procedure for obtaining an *approved Leave of Absence* will be subject to the school's stated policies on attendance for all absences recorded, regardless of circumstances.

Leave of Absence Procedures

Responsibilities:

School Director

- Receive request in advance in writing, include the reason for the student's request, and include the student's signature within two weeks.
- Approve the leave
- Make sure the leave of absence does not exceed 30 days with any additional leaves with a twelve-month period (only 1 leave will occur within 12 months. Period)
- Make an addendum on the original contract to make sure it is the same number of days taken in the LOA.
- Make sure the education of the student continues upon his return

Student

- Request in advance in writing a request for a leave of absence
- Get approval following the policy of the institution
- Make sure it doesn't exceed 30 days with any additional leaves within a twelve-month period
- Make sure an addendum is made to student contract
- Return with request days of actual leave of absence

SECTION FOUR

EDUCATION

NEW STUDENT ORIENTATION

New Student Orientation Expectations:

- 1. Teach students to utilize the resources & services that will help them be successful at DSDT.
- 2. Guide students in understanding the steps needed to achieve their academic and career goals.

ADMISSION REQUIREMENTS:

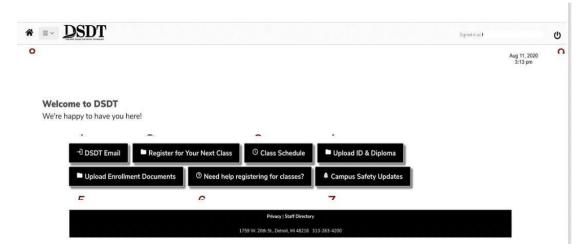
- Meet with an Admissions Representative
- Must submit High School Diploma or Equivalent, Driver's License/Picture ID
- Must sign enrollment agreements
- Attend an on-campus or online orientation

After our New Student Orientation, you'll be more familiar with:

- The types of programs offered at DSDT
- Accessing Campus Cafe and your DSDT email
- Campus resources
- How to set up your schedule for each month of enrollment
- Tuition & fees and the registration process
- Being ready for the first day of classes

Using Campus Cafe

On your Campus Cafe account, you have access to a variety of different options, which can be seen below:



Need to check emails from us?

1. DSDT Email

Where can I register for classes and view my class schedule(s)?

- 2. Register for your next class
- 3. Class Schedule

I'm a veteran, where would I upload my COE/DD 214?

4. Upload ID & Diploma: there will be two sections to upload your COE and DD 214, along with your proof of high school graduation and a form of ID. EVERY STUDENT IS REQUIRED TO SUBMIT A PROOF OF HIGH SCHOOL GRADUATION AND A PHOTO ID.

Where do I sign my orientation documents via DocuSign?

5. Upload Enrollment Documents

Help, I don't know how to register for classes!

6. This button will direct you to a YouTube video, detailing the class registration process.

Need to see Campus Safety Updates?

7. Campus Safety Updates

Need to return to the home page?

8. Home page

All done with using your Campus Cafe account.

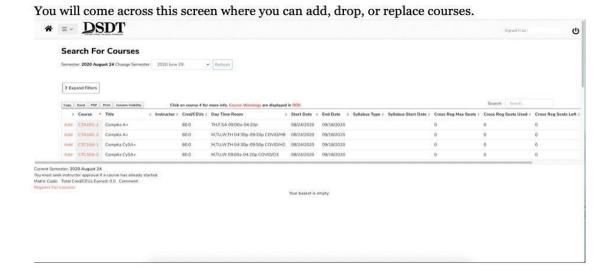
9. Click on the logout button to securely end your session.

Registering for Classes

Once you log into Campus Cafe, select the 'Register for your next class' button and select the desired month of registration:



NOTE: Please work with the Director of Student Services to choose your courses.



You can always view your class schedule (see page 11 for more information) to confirm you have registered for your desired course. Please be sure to register for the other months, depending on what program you're enrolled in.

For example: A Digital Marketing Professional Program student starting on August 24 will need to

register for 7 courses through the 7 months they're enrolled in, until the March 5 session.

Signing your Enrollment Documents

After you complete your on-campus or online orientation, you will be required to sign your enrollment documents. It is crucial that these documents are completed and signed, prior to the beginning of your classes, as it includes your program contract.

To sign your enrollment documents, navigate to the 'Upload Enrollment Documents' button on the home screen. You will see the following below:



If you do not see the 'Sign Document' button, you will need to scroll all the way to the right of your screen to access the button.

Then, you will sign all the required areas of the form. For the emergency contacts section, we highly recommend that you put down at least two people we can reach out to on your behalf, in the event of an emergency.

Please reference the New Student Orientation Guide for further information and Course Outlines

SATISFACTORY ACADEMIC PROGRESS POLICY AND PROCEDURES

The Satisfactory Academic Progress Policy is consistently applied to all students enrolled at DSDT. It is available online in the school catalog to ensure that all students receive a copy prior to enrollment. This policy complies with the guidelines established by the Council on Occupational Education and the federal regulations established by the United States Department of Education.

Evaluation Periods

Student will be evaluated to ensure they are meeting the SAP requirement at the following intervals.

For the following program SAP Evaluation takes place at the end of each payment period:

Diploma Program	Evaluation Period (clock hours)
Digital Marketing Professional	Academic Year 1- 300 &600 (actual hours attended)
Business Information Technology Specialist	Academic Year 1- 300 &600 (actual hours attended)

For all certification programs satisfactory programs are evaluated as followed:

Certification Program	Clock Hour Interval
Mobile IOS Developer	160, 320 (scheduled clock hours)
Technology Professional 6	80, 160, 240 (scheduled clock hours)
Technology Professional 2	40, 80 (scheduled clock hours)

Attendance Policy

Students are required to attend a minimum of 67% (66.5% or higher is rounded to 67%) of the hours scheduled based on their attendance schedule in order to be considered making Satisfactory Academic Progress (SAP). Attendance evaluations are conducted at the end of each evaluation period listed above to determine if the minimum requirements have been met. Attendance percentage is determined by dividing the total hours accrued (actual hours attended) by the total number hours scheduled at the end of the evaluation period (cumulative attendance from the beginning of the program to the date the checkpoint is reached). At the end of each evaluation period, the institution will determine if the student has maintained the cumulative minimum requirement of 67% since the beginning of the course, which will indicate that given the same attendance rate, the student will graduate within the maximum time frame allowed.

Example Attendance: A student is scheduled to attend 22 hrs. per week (67% x 22= 15).

DSDT encourages students not to miss any days. All absences are recorded and made a part of the school's permanent record. The student is responsible for class material and/or tests missed while absent (reference the Make-up Time Policy). Regardless of the average level of attendance, a student who has more than 10 school days (14 calendar days) of consecutive absences without communication to the Director of Administration/Designee will be dismissed on the 11th consecutive school day as an unofficial withdraw. Students with persistent absenteeism will be advised and subject to dismissal with re-enrollment at the

discretion of the Director of Administration/Designee.

Academic Progress Evaluations

The qualitative element used to determine academic progress is based a reasonable system of grades as determined by a combination of the academic curriculum and instruction. Academic learning is evaluated at the completion of each segment of the program. Students participate in academic learning and a minimum number of practical assignments. DSDT students are required to maintain a cumulative 70% Grade Point Average (GPA) in order to be considered making satisfactory academic progress (SAP). Academic Progress evaluations are conducted at the end of each evaluation period to determine if the minimum requirements have been met.

Academic Progress is determined by an average (cumulative) of the student's theory and practical grades. Practical skills evaluations will be conducted and delivered based on the program length, according to text procedures and set forth in practical skills evaluation criteria adopted by DSDT.

DSDT considers a "C" grade or 2.0 cumulative GPA the minimum cumulative standards required to graduate.

DSDT evaluates numerical grades based on the following grade point average (GPA) scale:

A	100%-90%	4.0	Exceeds Standards
В	89%-80%	3.0	Meets Standards
C	79%-70%	2.0	Minimum Standards
D	69%-60%	1.0	Unacceptable Standards
F	59% - 0%	0.0	Failure

Teaching And Learning Methods

The clock hour education is provided through a sequential set of learning steps which address specific tasks necessary for graduation and job entry level skills. Practical equipment, implements, and products are comparable to those used in the industry. Each student will receive instruction that relates to the performance of useful, creative, and productive career- oriented activities. The course is presented through comprehensive lesson plans which reflect effective educational methods. Subjects are presented by means of interactive lecture, demonstration, cooperative learning, labs, student Digital Marketing or Information Technology activities, and student participation. Audio-visual aids, guest speakers, field trips, projects, activities, and other related learning methods are used in the course.

Maximum Timeframe- Pace Of Completion

DSDT requires a student to progress through the program toward graduation within an established time frame. Based on DSDT's 67% attendance rate policy, the maximum time frame during which students are to complete any course is 150% of the published course length. DSDT students are monitored and advised monthly regarding their attendance and academic achievements. Maximum time frame is calculated during a student's training by dividing the number of clock hours earned by the number of clock hours attempted. If the result is 67% or greater, then the student is progressing at a pace to ensure completion within the maximum timeframe. If it becomes mathematically impossible for a student to complete the program within the maximum time frame, the student will be terminated from the program.

The maximum time frame allowed for students to complete each course is stated below:

Program	Maximum Time Allowed
	Weeks
Digital Marketing Professional Diploma (600 clock hours)	41
Business Information Technology	41
Specialist	
(600 clock hours)	
Mobile IOS Developer	22
(320 clock hours)	
Technology Professional 6	17
(240 clock hours)	
Technology Professional 2	6
(80 clock hours)	

^{*}All attempted, repeated courses and withdrawals, (except incompletes) at DSDT are counted toward the 150% eligibility.

Make-Up Time Policy

Students are expected to make-up missed days and exams. Students may utilize the various school schedules and classes to complete makeup time and exams. All attendance make-up time will be done during normal school hours but in the student's non-scheduled class time. We do not allow part-time students all students are considered full time for 22 hour pre week.

Excused Absence Policy

Absences are excused for up to 10% of scheduled course hours per payment period. A student's excused absences may not exceed 10% of scheduled course hours; absences greater than 10% of scheduled course hours are considered unexcused.

- It is expected that a student who is absent will make up hours at the next available make-up session. The dates and times for make-up sessions will be up to the instructor's discretion.
- Students can only make up hours previously missed and total attended hours cannot exceed total scheduled course hours.
- A grade of "F" will be posted if the student does not complete the required course hours.
- Students attending make-up hours must meet dress code and other DSDT policies.

Determination of Progress

Students are provided with cumulative progress reports on a monthly basis so they can track their progress. Students meeting the minimum qualitative 70% GPA requirement for academics and the quantitative 67% attendance (considered the pace) at the scheduled evaluation point are considered to be SATISFACTORY. Students that fail to meet the minimum requirements for making Satisfactory Academic Progress may have an interruption of their Title IV Funding (Financial Aid), unless the student is on Warning or has successfully appealed and was granted Probation.

Financial Aid Warning

Students failing to meet the minimum SAP requirements during an official evaluation period will be placed on Warning. The student will be advised in writing that they are in warning along with the actions that are required to attain SAP by the next evaluation period. If at the time of the next payment period, the student has still not met both the academic and attendance requirements, the student will be placed on probation. Students may not appeal ap5

^{*}All periods of attendance count toward maximum time frame.

Academic Warning. A student failing to meet the SAP requirements at the end of the Academic Warning period will be sent a Probationary letter and the option to appeal the decision.

Probation

Students who fail to meet the minimum SAP after a warning period may be placed on Probation. The student will be advised via email of the actions required to achieve SAP by the next evaluation, this is called an academic plan. If at the end of the probation period, the student has NOT met both the attendance and academic requirements to achieve SAP or the guidelines indicated by the academic plan, he or she will be deemed ineligible to receive Title IV funds (Financial Aid).

Re-Establishing Eligibility

Students may re-establish satisfactory academic progress and Title IV funding (if applicable), by meeting the minimum requirements by the end of the Warning or Probationary period. Students who re-enroll who were considered as not making SAP at the time of their previous withdrawal, may re- establish FSA eligibility upon meeting the published standards at the end of their first payment period after re- enrollment.

Appeal Procedure

If a student is determined to be in probationary status, the student may appeal the determination within ten calendar days. Appeals submitted outside of this deadline will be accepted and considered but may be applied for a subsequent academic period. The Director of Student Services is responsible for making a recommendation on the appeal and electronically submitting the appeal to the Director of Administration and sending it to the school Director. Reasons for which students may appeal a negative progress determination include death of a relative, an injury or illness of the student, or any other allowable special or mitigating circumstance. The student must submit a written appeal to the Director of Student Services describing why they failed to meet SAP standards, along with supporting documentation of the reasons why the determination should be reversed. This information should include what has changed about the student's situation that will allow them to achieve SAP by the next evaluation point. Appeal documents will be reviewed, and a decision will be made and reported to the student within 10 business days. All determinations are final. All documentation pertaining to the appeal will be retained in the student's academic file. The appeal and decision documents will be retained in the student file. If the student prevails upon the appeal, the Satisfactory Academic Progress determination will be reversed and the eligibility for Title IV Funds (Financial Aid) eligibility will be re-instated.

Suspension and Termination Policy

Suspension or termination from DSDT may happen if the student participates in any of the following:

- Possession of illegal drugs or alcohol on school premises, grounds, or parking lot
- Theft from students, or of school property, or supplies
- Willful destruction of school property
- Insubordination
- Loud, boisterous behavior or foul language

Diplomas and Certifications of Completions

Upon satisfactory completion of the required course hours and course requirements, a diploma or Certification of Completion will be issued to the student. The institution may withhold official academic transcripts and diplomas/certificates if the student has not met all financial obligations.

Changing Degrees, Second Degrees, Repeating Coursework, Incompletes and Withdrawals

DSDT does not offer degree programs at this time

In the case where a student pursues a second-degree program, courses taken that do not contribute to the new degree program DO NOT count toward the 150 percent requirement. Any repeat coursework, or coursework for which a grade of incomplete or withdrawn is given counts toward both the quantitative and qualitative measures for

calculating SAP. Any student pursuing an additional degree program is subject to both the 150 percent time frame and the 2.00 cumulative GPA requirements.

DSDT does not offer noncredit remedial courses. Therefore, noncredit remedial coursework is independent work and does not contribute toward the 150 percent completion time frame nor is it counted toward the qualitative 2.00 GPA requirement.

Change of Incomplete Grade

A grade of incomplete (I) may be changed to a passing grade, within the program length from the date of receiving the grade, if the student satisfactorily completes all the requirements set forth by the course instructor. Otherwise, the incomplete grade of an I will automatically be changed to an F. A student is given 14 days from the end of the term to make arrangements with their instructor if they have an I grade because of excused absences. To change the I to an F the student must make up the missing coursework within 14 days. Once the 14-day mark has passed, F grade will become permanent, and the student must retake the course.

When a grade of I is changed to a pass or fail grade, SAP is re-calculated.

Repeated Courses

Financial Aid and Veteran Affairs funding will not pay for a repeated class if the student has already passed the class with a grade that will be counted towards his/her degree. In cases that the student receives a failing grade for their coursework, financial aid will only pay for ONE repeat of any course. All courses affect both the qualitative and quantitative SAP measures by applying the failed and repeated course toward maximum time frame. Students are required to verify attendance for terms in which they receive unsatisfactory grades.

Summer Terms

DSDT does not distinguish between summer, fall and winter terms. However, student financial aid is subject to the annual loan limits subsidized and/or unsubsidized. All periods of enrollment count toward Satisfactory Academic Progress.

Transfer Credits

None of DSDT's programs accept transfer credits from another institution or grant students advanced standing in the program based on experience.

Credits earned at DSDT may not transfer to another educational institution. Transfer credits and acceptance of transfer credits for advanced standing will be at the discretion of the other institution. DSDT provides transcripts to other institutions upon request by the student or institution requesting them. A record release form will need to be filled out during orientation and in the students respective file at the time of the request. The ability to transfer credits to another institution may be limited.

Leave of Absence (LOA)/Withdrawals

If enrollment is temporarily interrupted for an approved Leave of Absence, the student will return to school in the same satisfactory academic progress status determined prior to the leave of absence. Students must submit a LOA request form, located in the student handbook, to the student services department.

Hours elapsed during the LOA will extend the student's contract period and maximum time frame by the same number of days taken and will not be included in the attendance percentage calculation. Students who withdraw from their program prior to completion and wish to re-enroll, will return in the same satisfactory academic progress status as at the time of withdrawal.

Withdrawals And The Return Of Title IV Funds

DSDT performs "Return to Title IV" calculations for all withdrawing students as per its R2T4 Policy. If a withdrawn student returns to school, DSDT will apply its SAP policy in continuation of such a student's SAP-status at the time of withdrawal. Title IV, HEA federal financial aid funds are awarded under the assumption that a student will remain in classroom attendance for the entire period for which the funds were awarded. When a student withdraws from their respective program of study, regardless of the reason, she/he may no longer be eligible for the full appoint

of funds originally awarded. The return of funds to the federal government is based on the premise that a student earns financial aid in proportion to the length of time during which she/he remains enrolled. A pro-rated schedule determines the amount of federal student aid funds she/he will have earned at the time of full withdrawal. There is no such thing as fraction of clock hours, it is not acceptable to round clock hours for R2T4 purposes.

Federal regulations require a recalculation of financial aid eligibility if a student:

- -Completely withdraws.
- -Stops attending before the semester's end.
- -Does not complete all modules in which the student is enrolled

DSDT students who receive federal financial aid and who do not remain in attendance through the end of the academic period may be responsible for repaying a portion of the financial aid originally received (Please see DSDT Refund Policy).

Students who do not begin attendance in classes are not eligible for federal financial aid and must repay all aid originally received.

SAP Procedures

Responsibilities of the following parties:

Director of Administration

- Make copies of DSDT progress reports for Financial Aid (FA) files- Place them in the Financial Aid Mailbox
- Place progress reports in Financial Aid folders and alert business office if student successfully meets requirements and is entering new pay period

Instructor

- Provide the student with instructional materials that challenge their knowledge on course objectives, theory, skill, and concepts
- Provide the student with practical and application exams challenge their knowledge on course objectives, theory, skill, and concepts
- Document grades in individual paper grade book and/or electronic grade (Campus Cafe) within 48 hours of completing the examination or skill assessment.
- Review progress monthly reports with students.
- Have student's sign and instructor sign progress report- return to student files.
- Alert Campus Director of students who fall below the 70%
- Print student monthly progress reports with student's current GPA and attempted total hours as of the date of the generated progress report.
- Place progress reports in instructor's mailbox
- Place signed copies in the student's academic folders.

Director

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

Warning Policy

Financial Aid Warning

Students failing to meet the minimum SAP requirements during an official evaluation period will be placed on Warning. The student will be advised in writing that they are in warning along with the actions that are required to attain SAP by the next evaluation period. If at the time of the next payment period, the student has still not met both the academic and attendance requirements, the student will be placed on probation. Students may not appeal an Academic Warning. A student failing to meet the SAP requirements at the end of the Academic Warning period will be sent a Probationary letter and the option to appeal the decision.

Warning Procedure

Responsibilities of the following parties:

Director of Administration

• Place copy of the Warning in the Financial Aid file

Instructor

• Monitor progress during the Financial Aid Warning

Director

- Will alert the Financial Aid Representative of student falling below SAP and Financial Aid Warning based on program progress and attendance at the end of the payment period.
- Meet with the student to discuss the guidelines of the Financial Aid Warning status
- Give a copy of guidelines of Financial Aid Warning to the student and a copy for Financial Aid file and to the Department of Education.
- Monitor progress during the duration of the Financial Aid Warning as indicated.

Appeal Procedure

If a student is determined to be in probationary status, the student may appeal the determination within ten calendar days. Appeals submitted outside of this deadline will be accepted and considered but may be applied for a subsequent academic period. The Director of Student Services is responsible for making a recommendation on the appeal and electronically submitting the appeal to the Director of Administration and sending it to the school Director. Reasons for which students may appeal a negative progress determination include death of a relative, an injury or illness of the student, or any other allowable special or mitigating circumstance. The student must submit a written appeal to the Director of Student Services describing why they failed to meet SAP standards, along with supporting documentation of the reasons why the determination should be reversed. This information should include what has changed about the student's situation that will allow them to achieve SAP by the next evaluation point. Appeal documents will be reviewed, and a decision will be made and reported to the student within 10 business days. All determinations are final. All documentation pertaining to the appeal will be retained in the student's academic file. The appeal and decision documents will be retained in the student file. If the student prevails upon the appeal, the Satisfactory Academic Progress determination will be reversed and the eligibility for Title IV Funds (Financial Aid) eligibility will be re-instated.

Academic Probation Policy

Students who fail to meet the minimum SAP after a warning period may be placed on Probation. The student will be advised via email of the actions required to achieve SAP by the next evaluation, this is called an academic plan. If at the end of the probation period, the student has NOT met both the attendance and academic requirements to achieve SAP or the guidelines indicated by the academic plan, he or she will be deemed ineligible to receive Title IV funds (Financial Aid).

Academic Probation Procedure Responsibilities of the following party:

Director

- During the Financial Aid (FA) Warning period, Director will monitor the progress of the student:
- Evaluate the student's progress at the end of the Financial Aid warning period
- Failure to reinstate, will offer the student option to appeal, hence probation.
- Proceed with appeals process
- Alert Director of Administration of student status
- Alert instructor of student status

REESTABLISHING ELIGIBILITY

Students may re-establish satisfactory academic progress and Title IV funding (if applicable), by meeting the minimum requirements by the end of the Warning or Probationary period. Students who re-enroll who were considered as not making SAP at the time of their previous withdrawal, may re-establish FSA eligibility upon meeting the published standards at the end of their first payment period after re- enrollment.

Withdrawals and the Return Of Title IV Funds

DSDT performs "Return to Title IV" calculations for all withdrawing students as per its R2T4 Policy. If a withdrawn student returns to school, DSDT will apply its SAP policy in continuation of such a student's SAP-status at the time of withdrawal. Title IV, HEA federal financial aid funds are awarded under the assumption that a student will remain in classroom attendance for the entire period for which the funds were awarded. When a student withdraws from their respective program of study, regardless of the reason, she/he may no longer be eligible for the full amount of funds originally awarded. The return of funds to the federal government is based on the premise that a student earns financial aid in proportion to the length of time during which she/he remains enrolled. A pro-rated schedule determines the amount of federal student aid funds she/he will have earned at the time of full withdrawal. There is no such thing as fraction of clock hours, it is not acceptable to round clock hours for R2T4 purposes.

Federal regulations require a recalculation of financial aid eligibility if a student:

- -Completely withdraws.
- -Stops attending before the semester's end.
- -Does not complete all modules in which the student is enrolled

DSDT students who receive federal financial aid and who do not remain in attendance through the end of the academic period may be responsible for repaying a portion of the financial aid originally received (Please see DSDT Refund Policy).

Students who do not begin attendance in classes are not eligible for federal financial aid and must repay all aid originally received.

Official Withdrawal

Occurs when a student contacts the Director of Student Services or the Director of Administration (verbally or in writing) to withdraw. The date the notification is received, is the date of withdraw. The Director of Financial Aid will then be notified and must begin the withdrawal process. The students last day of attendance will be used in the return to Title IV calculation.

Official Withdrawal Procedure

Responsibilities of the following parties:

School Director

- Complete the Financial Aid Return to Title IV, HEA worksheet
- Complete Institution's withdrawal form
- Alert Financial Aid to the student's DOD, and LDA
- Alert instructors of the withdrawal and for final grades.

Instructor

- Update the student's final grades in Campus Café system
- Complete student exit form
- Alert Financial Aid Representative and Business Representative

CFO

- Process the withdrawal according to guidelines for Institution and Title IV.
- Print an updated sign in sheet for Financial Aid and Education Department file.
- Alerts the third-party server, (BEN) of withdrawal and/or termination.
- BEN will calculate R2T4 and compare with school's calculations.
- Submits notification to the Third-party servicer of request to return monies owed based on R2T4 calculations in writing.
- Submits return within 45 days of the withdrawal
- Submits notification to the student the amount of return monies based on R2T4 calculations in writing.
- Ensure monies retuned is in the proper account for retrieval.
- Print updated Student Ledger Sheet of the R2T4 for Ed and student files.
- Supply the student with a final Student Ledger Sheet

Financial Aid Representative

- Financial Aid Exit Interview
- Place updated copies in the Financial Aid folder (student ledger, sign in sheet, withdrawal letters, notices, etc.)
- Will provide a letter or document of the process for the Return to Title IV process.
- Transfers/file from active the non-active.

Upon receipt of the official withdrawal information, DSDT 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;
- 2. Two calculations are performed:
 - (a) The 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 Title IV, HEA funds for which the school is responsible. Returns made to the Federal Funds Account are calculated using the Department's Return of Title IV, HEA Funds Worksheets, scheduled attendance and are based upon the payment period.
 - (b) Calculate DSDT's refund requirement (see school refund calculation in R2T4 Policy).
- 3. The student's grade record will be updated to reflect his/her final grade.
- 4. DSDT will return 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.
- 5. The school will provide the student with a letter explaining the Title IV, HEA requirements:
 - a) The amount of Title IV assistance the student has earned. This amount is 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.
 - b) Any returns that will be made to the Title IV, HEA Federal program on the student's behalf as a result of exiting the program. If a student's 102

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.

- c) Advise the student of the amount of unearned Federal funds and tuition and fees that the student must return, if applicable.
- 6. Supply the student with ledger card record noting outstanding balance due to DSDT and the available methods of payment. A copy of the completed worksheet, check, letter and final ledger card will be kept in the student's file.

In the event a student decides to rescind his or her official notification to withdraw, the student must provide a signed and dated written statement that he/she is continuing his or her program of study and intends to complete the payment period. Title IV, HEA assistance will continue as originally planned. If the student subsequently fails to attend or ceases attendance without completing the payment period, the student's withdrawal date is the original date of notification of intent to withdraw.

Unofficial Withdrawal Policy

If DSDT unofficially withdraws a student from school, the School Director and/or Business Representative must complete the Withdrawal Form. An unofficial Withdraw occurs when a student leaves the school without notice and/or when he/she is not meeting satisfactory academic progress. A student's withdrawal date is their last date of physical attendance.

Any student that does not provide official notification of his or her intent to withdraw and is absent for more than 14 consecutive calendar days, will be subject to termination and considered to have unofficially withdrawn.

Their date of determination is 14 days after they cease attendance. Aid received prior to the determination date is aid that could have been disbursed.

If a student withdraws during a leave of absence, the date of determination is the date they officially withdraw. If the student does not return from a leave of absence, their date of determination is the date they were scheduled to return.

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

- 1. The Financial Aid Representative and/or School 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. DSDT 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 school's refund requirement (see school refund calculation);
- 7. DSDT, CFO will return to the Federal fund programs any unearned portion of Title IV funds for which the school is responsible within 45 days of the date the withdrawal determination was made and note return on the student's ledger card.

- 8. If applicable, DSDT, will provide the student with a refund letter explaining Title IV requirements:
 - a) The amount of Title IV, HEA 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.
 - b) Advise the student in writing of the amount of unearned Title IV aid and tuition and fees that he/she must return, if applicable.
 - c) Supply the student with a final student ledger card showing outstanding balance due the school and the available methods of payment.
- 9. A copy of the completed worksheet, check, letter, and final ledger card will be kept in the student's file.

Withdraw Before 60%

DSDT must perform a R2T4 to determine the amount of earned aid through the 60% point in each payment period or period of enrollment. DSDT will use the Department of Education's prorate schedule to determine the amount of the R2T4 funds the student has earned at the time of withdraw.

Withdraw After 60%

After the 60% point in the payment period or period of enrollment, a student has earned 100% of the Title IV, HEA funds he or she was scheduled to receive during this period. DSDT must still perform a R2T4 to determine the amount of aid that the student has earned.

DSDT, measures progress in Clock Hours, and uses the payment period for the period of calculation.

The Calculation Formula:

Determine the amount of Title IV, HEA Aid that was disbursed plus Title IV, HEA Aid that could have been disbursed.

Calculate the percentage of Title IV, HEA aid earned:

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%, proceeds with calculation.
- d) Percentage earned from (multiplied by) Total aid disbursed or could have been disbursed = AMOUNT STUDENT EARNED.
- e) Subtract the Title IV aid earned from the total disbursed = AMOUNT TO BE RETURNED.
- f) 100% minus percent earned = UNEARNED PERCENT
- g) Unearned percent (multiplied by) total institutional charges for the period = AMOUNT DUE FROM DSDT.
- h) 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.
- i) DSDT will issue a grant overpayment notice to student within 30 days from the date the school's determination that student withdrew, giving student 45 days to either:
- j) Repay the overpayment in full to DSDT or Sign a repayment agreement with the U.S. Department of Education.

Order of Return

DSDT 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 on your behalf is available through the office upon student request.

In accordance with Federal regulations, when Title IV, HEA financial aid is involved, the calculated amount of the R2T4 Funds" is allocated in the following order:

- Unsubsidized Direct Stafford loans (other than PLUS loans)
- Subsidized Direct Stafford loans
- Parent Plus loans
- Direct PLUS loans
- Federal Pell Grants for which a Return is required
- Iraq and Afghanistan Service Grant for which a Return is required
- Federal Supplemental Educational Opportunity Grant
- Other Title IV assistance
- State Tuition Assistance Grants (if applicable)
- Private and institutional aid
- The Student

Earned AID:

Title IV, HEA aid is earned in a prorated manner on a per diem basis (calendar days or clock hours) up to the 60% point in the semester. Title IV, HEA aid is viewed as 100% earned after that point in time. A copy of the worksheet used for this calculation can be requested from the Financial Aid Representative and/or Business Representative's office.

Unofficial Withdrawal Procedure

Responsibilities of the following parties:

Instructor

- Update the student's final grades in the gradebooks
- Complete student exit form
- Have student sign withdrawal forms if available or mail them if student is not available to sign.
- Alert Financial Aid to the student's DOD, and LDA
- Print an updated attendance sheet for student and ED file.

School Director/Business Representative

- Process the withdrawal according guidelines.
- Alert FA to the student's DOD, and LDA
- Print an updated sign in sheet for Student and ED file.
- Alert instructors of the withdrawal and for final grades.

Business Representative

- Alert (BEN) of student withdrawal and/or termination. DSDT will calculate the R2T4 worksheet and compare to school's calculation.
- Submits notification to the Third-party servicer of request to return monies owed based on R2T4 calculations in writing.
- Submits return within 45 days of the withdrawal

- Submits notification to the student the amount of return monies based on R2T4 calculations in writing.
- Print updated Student Ledger Sheet of the R2T4 for Student and FA files.
- Supply the student with a final Student Ledger Sheet.

Financial Aid Representative

- Contact student via mail or phone to complete Exit Interview.
- Place updated copies in the Financial Aid folder (student ledger, sign in sheet, withdrawal letters, notices, etc.).
- Will provide a letter or document of the process for the Return to Title IV process via mail.
- Transfers/ file from active the non-active.

Post-Withdrawal Disbursement Policy

If a student receives less Title IV funds than the amount earned, the school will offer the student a disbursement of the earned aid that was not received at the time of their withdrawal which is called a post- withdrawal disbursement. Post-withdrawal disbursements will be made from Pell Grant funds first, if the student is eligible. If there are current educational costs still due to the school at the time of withdrawal, a Pell Grant post-withdrawal disbursement will be credited to the student's account. Any remaining Pell funds must be released to the student without the student having to take any action. Post-withdraw disbursements must be made within 45 days.

If any federal loan funds are due in a post-withdrawal disbursement, they must be offered to the student within 30 days of withdrawal and the school must receive the student's authorization before crediting their account.

The student is required to respond within 14 days to the email notice and state whether they accept or reject the disbursement. If DSDT does not hear back from the student, we will return the funds.

*It is also important to understand that accepting a post-withdrawal disbursement of student loan funds will increase a student's overall student loan debt that must be repaid under the terms of the Master Promissory Note. Additionally, accepting the disbursement of grant funds will reduce the remaining amount of grant funds available to the student should the student continue his/her education at a later time. *

Post Withdrawal Disbursement Procedure

Responsibilities of the following parties:

FA Officer

- 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.
- Place the signed form in their Financial Aid folder

SECTION FIVE

FINANCIAL AID

General Administrative Requirement

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

Introduction to the Financial Aid Department

DSDT's Financial Aid Department is central in the processing and monitoring of all Federal Student Aid including federal, state, outside agencies and/or institutional. This Department works closely and in coordination with the Business Department, the School Director and Student Services.

Mission & Purpose of the Financial Aid Department

The financial aid department follows DSDT's mission to train, employ, and empower individuals for gainful employment.

The Financial Aid Department provides information, guidance and advice to students securing funding for their education and financial obligations. The department is responsible for processing all Title IV aid for which students are eligible. The Financial Aid Director and the staff members in the department are available during the normal business hours.

Structure and Responsibilities of the Financial Aid Department

The Admissions and Financial Aid Representative is responsible for administering all Title IV, HEA awards including awarding, cancellation, Exit Counseling, and the return of funds (Business Department).

The Director/Business Office completes all regulatory reporting.

The Financial Aid Representative and staff members counsel, package, complete verification process and resolve "C" code comments concerning FAFSA. They coordinate and consult with the third-party servicer, The Boston Educational Network (BEN), for processing of all Title IV Financial Aid.

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

Financial Aid Department of Administration

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

Monday- Friday 9:00am-5:00pm

Telephone: (313)263-4200 Email: Financialaid@dsdt.edu

Website: https://www.dsdt.tech/financial-aid-resources/

The staff in the Financial Aid Department at DSDT provides the necessary tools and resources to open the door for a quality education. Depending on the size of the school, the Financial Aid Department has enough qualified personnel to administer the Title IV programs. While the primary responsibility of meeting postsecondary education costs rests with the student and family, our financial aid professionals seek to maximize financial aid opportunities by providing guidance and information about Title IV grants, loan programs, student employment, and payment options.

Policies & Procedures Development Responsibilities

The Financial Aid Director is ultimately responsible to develop Title IV policies and procedures and maintain periodic reviews and updates. The Director is responsible for ensuring others are aware of any changes to existing policies and procedures or the development of new ones. Generally, updates are made as the federal and state regulations change, otherwise every year policies and procedures are reviewed and notified to all concerned via email and inter-office memorandum. These policies and procedures manuals are available online in the institution's official website.

The web address is

https://www.dsdt.tech/wp-content/uploads/2020/07/2020-TITLE-IV-HEA-POLICY-AND-PROCEDURES.pdf.

The Financial Aid Representative frequently checks the Department of Education's Information for Financial Aid Professionals (IFAP) website as it is a Title IV, HEA requirement for schools to have access to the IFAP website. DSDT financial Aid Department subscribes to IFAP's service notifications via email maintaining new and timely statutory and/or regulatory changes.

Administrative Organization & Department Management

Various departments that make-up the DSDT's administration such as the financial aid, admissions, student services and business cohesively work together to ensure compliance and create a system of checks and balances. This ensures DSDT is in compliance with Title IV, HEA programs and their regulations. Please reference full job descriptions in Section one of this manual.

Separation of Duties

These various offices work independently as required by the regulatory agencies but in close coordination and report to the CEO/Director of the School. The Director of Admissions is

responsible for all recruitment and admissions activity performed by Admissions representatives, and registration and orientation of new students. The Financial Aid Department is responsible for processing FAFSA application, needs analysis, awarding and processing of all Title IV, HEA aids, institutional and outside grants, and scholarships. The Business Office maintains all student records related to all payments including Title IV, HEA awards. The business office is responsible for maintaining individual student accounts and continuous updating for the student ledger cards. The Director of the school is responsible for making sure the instructors record grades, monitoring, and implementing attendance. The Director performs SAP and enforces attendance, leave of absence and satisfactory academic progress policies and procedures.

Student Eligibility

The Consumer Information page is intended to supplement the information provided in our schools' Campus Catalog and other publications. In many instances, the website indicates where additional information relating to the subject may be located, 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). This website also serves to notify current and prospective students 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.

Application Process

• Complete a Pre-Enrollment Application Form: Complete and submit the application form to the secure online portal system, Campus Café, prior to registration. All forms whether needed from the student or from the Director of Admissions will be uploaded into the students' individual portal.

Individuals receiving Title IV funds will need to complete all requirements listed above and must attend a personal interview with a Financial Aid Representative. A telephone interview may be considered if the applicant's geographical location and ability to travel to the interview site is a hardship.

Acceptance

- 1. Attend Orientation via (online or in-person) After a prospective student has completed the pre-enrollment application process and has been through the initial screening, the Admissions Representative will review the applicant. If they meet the requirements, the applicant will be reviewed by the Director of Admissions and the Director of Student Services and scheduled for orientation. Applicants must complete an in-person or online orientation with the Admissions Team prior to acceptance.
- 2. Applicants must provide the following verification documents:

- 1. High school diploma, high school transcripts, or GED,
- 2. And current driver's license, state approved ID, or picture ID with social security card or birth certificate

Note: We are required to verify your proof of education is from a valid high school or GED program.

Admission Requirements for Students with a High School Diploma are as follows:

- 1. **Proof of Age** Applicants who are not 18 years of age prior to their desired start date at DSDT may apply at the age of 17 with parental permission.
- **2. Proof of education** Students must also be able to provide proof of appropriate educational requirement such as;
 - · High school diploma
 - · Homeschooling Through homeschooled students is not considered to have a high school diploma or equivalent, the student can be eligible to receive FSA funds if their secondary school education was in a homeschool that state law treats as a home or private school. Some states issue a secondary school completion credential to homeschoolers. If this is the case in the state where the student was homeschooled, the student must obtain this credential to be eligible for FSA funds. The student can include in their homeschooling self-certification that they received this state credential.
 - Foreign High School diploma or transcript Note: The high school diploma or transcript requirement can also be from a foreign school if it is equivalent to a U.S. high school diploma; Documentation of proof of 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.)
 - Recognized equivalents of a high school diploma- The Department of Education recognizes several equivalents to a high school diploma:
 - · A GED certificate;
 - A certificate or other <u>official completion</u> documentation demonstrating that the student has passed a state-authorized examination (such as the Test Assessing Secondary Completion (TASC) the High School Equivalency Test (Hi SET), or, in California, the California High School Proficiency Exam) that the

- state recognizes as the equivalent of a high school diploma (note that certificates of attendance and/or completion are not included in this qualifying category)
- For Veterans only: As an alternative document you may submit a copy of DD Form 214 Certificate of Release or Discharge from Active Duty to verify a student's high school completion if it indicates that the individual is a high school graduate or equivalent.
- 3. Complete Enrollment Contract & Enrollment Documentation Once orientation is completed, the prospective student will receive a copy of the student handbook along with a copy of the enrollment contract and information covering costs and payment plans prior to the beginning of class attendance. DSDT clearly outlines the obligation of both the school and the student in the enrollment contract. When the student has completed all the necessary requirements, he/she receives an acceptance letter and will be placed into the respective program of study. Note: All applicants must go through the entire enrollment application process (detailed in the catalog, online publication, and on the enrollment application).

Application Procedure

Responsibilities of the following parties:

Admissions Representative

- Greets/schedules facility tour for the prospective student or conducts zoom session
- Enters the student into Campus Café to allow them to complete the pre-enrollment form
- Obtains a copy of their Driver's license/HS Diploma and uploads via secure portal
- Conducts the entrance interview

Financial Aid Representative

- Discuss the process of FA or reviews the obtained ISSR
- Reviews the Award letter
- If the student's goal is to enroll, the FAR representative collects the necessary documents and has the student complete the required registration papers and complete the required paperwork for their aid

Director

- Provides new student with New Student Orientation Guide
- Provides a copy of the enrollment agreement, and orientation dates
- Will Remind and gather student documents into secure portal
- Will Set appointment dates in the event admission requirements are missing

FA Servicer Policies and Procedures

The cash management regulations are intended to promote sound cash management of FSA program funds by schools; minimize the costs to the government of making FSA program funds available to students and schools; and minimize the costs to students who receive FSA loans. Except for funds provided by the Secretary for administrative expenses and funds used for the Job Location and Development Program under 34 CFR part 675, subpart B, funds received by an institution under the Title IV programs are held in trust for the intended beneficiaries.

The school, as a trustee of those funds, may not use the funds as collateral or engage in any practice that risks the loss of those funds. Moreover, a school must exercise the level of care and diligence required of a fiduciary in managing Title IV program funds.

To ensure adequate cash management practices, a school must have in place a cash management system that adheres to federal regulations and other standards. A school's cash management practices are governed by:

Generally Accepted Accounting Principles (GAAP), standards prescribed by the federal Office of Management and Budget (OMB),

U.S. Department of Treasury regulations, and

U.S. Department of Education (ED/the Department) regulations.

Requesting Funds

DSDT utilizes a federal third- party servicer, Boston Education to provide services to process Financial Aid data, provide training, and make sure the institution is following the federal regulation and policies.

Managing Excess Cash

A school must disburse funds no later than three business days following the date the school receives them. The department considers excess cash to be any amount of FSA funds, other than Perkins Loan funds, that a school does not disburse to students or parents by the end of the third business days following the date the school.

- · Received those funds from the Department; or
- Deposited or transferred to its depository account previously disbursed FSA funds received from the Department, such as those resulting from award adjustments, recoveries, or cancellations.

If a school cannot disburse funds in the required three days because of circumstances outside the school's control. (change in student enrollment status, student's failure to attend classes as scheduled, or a change in a student's award as a result of verification. In view of these

circumstances, a school may maintain some excess cash for up to seven additional days if the excess cash does not exceed 1% of the total amount of funds the school drew down in the prior award year. The school must return immediately to the Department of Education any amount of excess cash over the 1% tolerance and any amount remaining in its account after the seven-day tolerance period.

Where excess cash balances are disproportionately large or where they represent a continuing problem with a school's ability to responsibly administer the FSA program, the Department may initiate a proceeding to fine, limit, suspend, or terminate the school's participation in one or more of the FSA programs.

Returning Funds to the Department of Education

For Funds electronically transmitted by the Department, the three-day period begins on the day the school receives the funds in the account designated by the school for that purpose.

- As part of the school's compliance with the requirement to return funds if a student withdraws before completing a period for which she was paid;
- That are Pell Grant funds deposited because of adjustments to the student's award and Direct Loan funds deposited because of adjustments or cancellations;
 and
- · Because a student failed to begin attendance—

The three-day period begins on the date the school deposits the funds in its federal account.

A school must return or deposit funds for a student who failed to begin attendance no later than 30 days after the date the school becomes aware that the student did not begin and will not begin attendance.

A school must return aid for a student who withdraws before completing a period for which the student was paid within 45 days of determining the student withdrew.

Cash Management Regulations Procedures

Responsibilities

CFO

- Request funds from Boston Educational Network
- Disburse funds to eligible student and parent
- Manage excess cash b
- Return funds to the Department of Education
- Reconciliation
- Report the activities to Boston Educational Network

Internal Controls

Internal Controls Policy

The Internal Control at the institution is a system of check and balances. The institution has a well-organized financial aid Department member who has been trained by Boston Educational Network and the State Department of Education. The school's plan of organization and all the policies, procedures, and actions taken by the school to provide reasonable assurance that the school will achieve its objectives in the following areas:

- 1. Effectiveness and efficiency of operations
- 2. Accuracy of operating data
- 3. Reliability of program reporting
- 4. Protection of funds against fraud and misuse
- 5. Compliance with organizational policies and applicable FSA laws and regulations.

The school's administrative objectives, including performance and financial goals and safeguarding of resources addresses the internal control. The decisions made by the institution on its day-to-day operations are based on accurate information. The institution preparation of financial statements, audits, and other fiscal and operational reports a school is required to make to the Department. The school's fiduciary responsibility is to safeguard FSA funds and ensure they are used for the purposes and by the recipients intended. The school complies with all applicable federal, and state, laws, and regulations, as well as the regulations of its accrediting agency. The institution utilizes a local auditor, eZ audit and FINANCIAL AID SERVICES

(FAS) to make sure the school is complying and safeguarding FSA funding. The components are:

- ◆ Control Environment—the control environment sets the tone of an organization and influences the mind-set of its employees. It is the foundation for all other components of internal control, providing its discipline and structure. Control environment factors include the integrity, ethical values, and competence of the school's people; management's philosophy and operating style; and the way a school's administration assigns authority and responsibility and organizes and develops its employees.
- ◆ Risk assessment—every entity faces a variety of risks from external and internal sources. Risk assessment is the identification and analysis of risks that have the potential to negatively affect a school's satisfactory management of the FSA programs, its financial strength, its public image, and the overall quality of its programs and services.
- ◆ Information and communication. Pertinent information must be identified, captured, and communicated in a form and time frame that enables employees to carry out their responsibilities.
- ◆ Monitoring—Internal control systems need to be monitored— a process that assesses the quality of the system's performance over time. This can be accomplished through ongoing monitoring activities, separate evaluations, or a combination of the two.
- ◆ Control Activities Control activities are the policies and procedures that help ensure a school's administrative directives are followed. They help guarantee that the actions necessary to reduce risk are carried out.

Internal Controls Procedures

Responsibilities

CFO

- Follow the rules and safeguard funding
- Authorize and disburse funds