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# DSDT

**TITLE IV, HEA  
POLICIES AND PROCEDURE MANUAL  
2024-2025**

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### **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 respective 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](mailto: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.

### **Non-discrimination Policy**

DSDT is committed to a policy of equal opportunity for all people and does not discriminate on the basis of race, color, national origin, age, marital status, sex, sexual orientation, gender identity, gender expression, disability, religion, height, weight, or veteran status in employment, educational programs and activities, and admissions.

DSDT values and upholds the equal dignity of all members of its community and strives to balance the rights of the parties in the resolution process during what is often a difficult time for all those involved.

DSDT adheres to all federal, state and local civil rights laws prohibiting discrimination in employment and education. The college does not discriminate in its employment practices on the basis of sex/gender. Sexual harassment, sexual assault, dating and domestic violence, stalking and sexual exploitation are prohibited under Title IX and by college policy.

The law and DSDT's policy prohibit discrimination and harassment of employees or discrimination and harassment between members of the college community: for example, between an employee and a supervisor, between two employees, or between an employee and an applicant or campus guest. Any member of the campus community who acts to deny, deprive or limit an employment opportunity of any member of the DSDT community on the basis of sex is in violation of this policy.

Any person may report sex harassment, discrimination or other forms of sexual misconduct, whether or not the person reporting is the person alleged to have experienced the conduct. Reports may be made by telephone or email directly to the Director of Administration. Reports can be made any time, including during non-business hours, by calling DSDT directly at 313-263-4200 or by emailing [katie@dsdt.tech](mailto:katie@dsdt.tech).

### **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.

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

#### *Admissions Representative*

- Develops and implement Offer tour of DSDT to prospective students
- Develops and implement all admissions goals and strategies.
- Market and promote DSDT to the external community.
- Ensures each class is filled with the appropriate number of qualified students.
- Advise students with consumer information.
- Provide students with consumer information.
- Assesses a student's Financial Aid need and directs them to the Financial Aid Department.
- Works closely with the institution's leadership.
- Works closely with the head of each educational department, as well as the financial aid team.
- Ensures the admissions process runs smoothly.

#### *Financial Aid Representative*

- Responsible for all Admissions and Enrollment requirements and processing
- Completing all compliance requirements for 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 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

#### *Business Office Representative*

- Establish and monitor payroll
- Assist with PPA agreement between third party and process of creating G5, PELL, and Direct Loan accounts
- Maintain a system of student accounts that records charges, credits, and amounts due
- Collecting and disbursing any funds to students and/or Department of Education
- Reconcile accounts and maintain records to ensure a clear audit trail
- 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 submitting calculations 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
- Draw down 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

#### *Director*

- 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 Representative, 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.

#### *Instructor*

- 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
- 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.

- Prepare for and participate in new student orientation according to school policy and as assigned.
- 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.
- Conducts quality assurance audits and participates in committees and meetings to receive and report information.
- 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.
- Meets with employer affiliates to ensure training is relevant and accurate. Document placement efforts.
- Participates in professional training and/or coursework as needed and required.
- Properly prepare graduating students for the applicable state licensing examinations
- Gain a working knowledge of the school's satisfactory academic progress policy, the standards of conduct, practical course requirement, grading policies and criteria, and state regulations

### **Separation of Duties**

These various offices work independently as required by the regulatory agencies but in close coordination and report to the respective School Director. 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 respective School Director 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 respective 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 respective School Director during normal business hours. A paper copy of consumer information disclosures and school publications are available on request.

## ADMISSIONS POLICY AND PROCEDURES

### Admissions 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.

### Admissions Procedure

- Speak with an Admissions Representative
- Tour the Facility

### 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:
  - High school diploma, high school transcripts, or GED,
  - 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 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 official completion 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

## **ENROLLMENT INFORMATION**

DSDT's full policy can be found in the updated Student Catalog, listed on DSDT's website and in print throughout DSDT in the "Policy and Procedure" Master Handbook.

### **Attendance Policy**

For the Full SAP Policy, Please refer to DSDT Student Handbook listed on DSDT's website and in print throughout DSDT in the "Policy and Procedure" Master Handbook.

### **Introduction**

The policy complies with the guidelines established by the federal regulations of United States Department of Education. The Title IV Satisfactory Academic Progress (SAP) Policy is applicable to all students enrolled at DSDT receiving Federal Funds. It is printed in the catalog to ensure that all students receive a copy prior to enrollment. Satisfactory Academic Progress (SAP) must be maintained to meet the institution's academic policy.

### **Distance Education**

Faculty members teaching an online course must record attendance within the first week of class by demonstrating that students have participated in a face-to-face class activity or were otherwise engaged in an academically- related online activity.

Options to Comply with Attendance Requirement

- Physically attending a class where there is an opportunity for direct interaction between the instructor and students
- Completion of an initial assignment regarding academic policies, introduction discussion board posting or graded assignment
- Submitting an academic assignment
- Completing an exam, an interactive tutorial, or computer-assisted instruction
- Attending a study group that is assigned by the institution
- Participating in an online discussion about academic matters
- Initiating contact with a faculty member to ask a question about the academic subject studied in the course

Activities that Can NOT be used for Attendance

- Logging into an online class without active participation
- Participating in academic counseling or advisement

### *After Week 1*

After the first week, the student's "attendance record" Students must continue to comply with DSDT policies and procedures regarding attendance. Students will only be considered present for class if they attend during scheduled class periods. If a student is not able to attend class due to a scheduled or unforeseen situation, the student is responsible for communication to the instructor and scheduling time to make up the missed class.

Weekly attendance is mandatory and, just as in traditional courses, if a student does not meet attendance requirements as stated in the course syllabus or DSDT policies, the student will be officially dropped from the course. Failure to meet minimum attendance standards could result in a grade of F and adversely impact financial aid.

### *Student Authentication*

The Federal Government requires institutions that offer distance education courses or programs to have processes in place to authenticate that the student who registers in such a course or program is the same student who participates in and completes the course or program and who receives the academic credit.

## **Academic Progress**

In order for a student to be making SAP by their respective program midpoint, the student must meet 67% in attendance and 70% academic requirements.

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

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 listed above). 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 11<sup>th</sup> 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.

## **Determination Of Progress**

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.

## **Attendance Procedure**

Responsibilities of the following parties:

### *Financial Aid Representative*

- Attempts to contact students who has continuous absences
- Updates the student's time in the event of errors student's attendance due to technical issues, holidays, weather, or students who forgot to clock in or out.

### *Director of Administration*

- Monitor's daily attendance to ensure student maintaining satisfactory academic progress
- Alerts the Campus Director of students who are approaching 10 or 14 due absences.

### *Instructor*

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

### *Director*

- Orientates students on how to clock in and out on orientation da Meet with students who are continuously tardy
- Populate withdrawal letters for students who fail to follow the attendance policy.

## **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 Procedure**

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 Representative for an interview.

#### **Step 3**

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

**SATISFACTORY ACADEMIC PROGRESS  
POLICY AND PROCEDURE**

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:

<b>Diploma Program</b>	<b>Evaluation Period (clock hours)</b>
Medical Assistant	Academic Year 1- 380 &760 (actual hours attended)
Digital Marketing Professional	Academic Year 1- 300 &600 (actual hours attended)
Business Information Technology Specialist	Academic Year 1- 300 &600 (actual hours attended)
Machine Learning Specialist	Academic Year 1- 300 &600 (actual hours attended)

For all certification programs satisfactory programs are evaluated as followed:

<b>Certification Program</b>	<b>Clock Hour Interval</b>
Full Stack Developer	160, 320 (scheduled clock hours)
Technology Professional 6	80, 160, 240 (scheduled clock hours)
Technology Professional 2	40, 80 (scheduled clock hours)
AI Prompt Specialist	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 ( $67\% \times 22 = 15$ ). 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 and/or respective School Director will be dismissed on the 11<sup>th</sup> 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 and/or respective School Director.

### 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:

<b>A</b>	100%-90%	4.0	Exceeds Standards
<b>B</b>	89%-80%	3.0	Meets Standards
<b>C</b>	79%-70%	2.0	Minimum Standards
<b>D</b>	69%-60%	1.0	Unacceptable Standards
<b>F</b>	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
Medical Assistant (760 clock hours)	52
Digital Marketing Professional Diploma (600 clock hours)	41
Business Information Technology Specialist (600 clock hours)	41
Machine Learning Specialist (600 clock hours)	41
Full Stack Developer (320 clock hours)	22
Technology Professional 6 (240 clock hours)	17
Technology Professional 2 (80 clock hours)	6
AI Prompt Specialist (80 clock hours)	6

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

\*All periods of attendance count toward maximum time frame.

### 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 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.

### **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 (Main Location) is responsible for making a recommendation on the appeal and electronically submitting the appeal to the Director of Administration (Main Location) and sending it to the respective 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 (Main Location) 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.

A transcript fee of \$10 will apply if an additional request is made after the first release of transcripts. Please send a money order (personal checks are NOT accepted) and complete the Transcript Request Form.

## **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.

For Texas Branch Location Only:

*\*Incomplete:* An "I" for Incomplete is assigned when all the work of a subject class cannot be completed due to circumstances beyond the control of the student. The student may complete the work by the end of the term, or the student can notify the school registrar for readmission for one opportunity to complete the work in a subsequent term beginning no later than 12 calendar months after the end of the term in which the student was assigned the "I". There will be no additional administrative or tuition fees charged for students who exercise this option; however, there may be additional fees for books, supplies, and/or tool kit.

**\*\*Withdrawal:** Under Texas Education Code §132.061(f), a student who is obligated for the full tuition and is withdrawing for an appropriate reason unrelated to the student's academic status may request a grade of "I" for incomplete. A "W" for Withdrawal indicates that the student officially withdrew or was administratively withdrawn from the subject class. A student with a grade of "W" cannot complete the course of study, and will be issued a refund in accordance with the refund policy below.

### **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 main location 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 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.

### **SAP Procedures**

Responsibilities of the following parties:

#### *Director of Administration and/or respective School Director*

- 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 and/or respective School Director*

- 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 at the main location is responsible for making a recommendation on the appeal and electronically submitting the appeal to the Director of Administration at the main location and sending it to the respective 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 at the main location 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 at the main location (verbally or in writing) to withdraw. The date the notification is received, is the date of withdraw. The Director of Financial Aid at the main location 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:**

#### *Respective 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 returned 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 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 respective School Director 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 respective 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:

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

- a. If this percentage is greater than 60%, the student earns 100%.
- b. If this percent is less than or equal to 60%, proceeds with calculation.
- c. Percentage earned from (multiplied by) Total aid disbursed or could have been disbursed = AMOUNT STUDENT EARNED.
- d. Subtract the Title IV aid earned from the total disbursed = AMOUNT TO BE RETURNED.
- e. 100% minus percent earned = UNEARNED PERCENT
- f. Unearned percent (multiplied by) total institutional charges for the period = AMOUNT DUE FROM DSDT.

- g. 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.
- h. 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:
- i. 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.

##### *Respective 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-withdrawal 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

## **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:

<b>Financial Obligation (based on payment period)</b>	<b>Institutional Refund</b>
<b>00.00%-10%</b>	90%
<b>10.01%-25%</b>	50%
<b>25.01%-50%</b>	25%
<b>50.01%-100%</b>	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.
2. 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 DSDT 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, their 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 DSDT 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 withdraw 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.

<b>.01% to 04.9%</b>	20%
<b>.05% to 09.9%</b>	30%
<b>10% to 14.9%</b>	40%
<b>15% to 24.9%</b>	45%
<b>25% to 49.9%</b>	70%
<b>50% to 100%</b>	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 prospective 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)

## Return to Title IV Policy

### RETURN OF TITLE IV FEDERAL STUDENT AID

#### **\*This refund policy is in addition to the Institutional Refund Policy\***

Federal Financial Aid Refunds - Return of Title IV Calculation

*The school participates in federal financial aid for the 600-clock hour Digital Marketing Professional Diploma Program, the 600-clock hour Business Information Technology Specialist Diploma Program, the 760-clock hour Medical Assistant Diploma Program and the 600-clock hour Machine Learning Specialist Diploma Program. The 80-clock hour Technology Professional 2 Certificate Program, the 80-clock hour AI Prompt Specialist Certificate Program, 240-clock hour Technology Professional 6 Certificate Program and 320-clock hour Full Stack Developer Certificate programs are NOT eligible for Title IV funds. Please refer to the following refund policy for specific consumer information pursuant to the federal financial aid program.*

The Federal Return of Title IV funds formula (R2T4) dictates the amount of Federal Title IV aid that must be returned to the federal government by the school and/or the student. The federal formula is applicable to an eligible student receiving federal aid when that student withdraws at any point during the payment period. If a student did not start or begin attendance at the school, the R2T4 formula does not apply.

#### **Official Withdrawal**

Occurs when a student contacts the Director of Administration and/or the respective School Director (verbally or in writing) to withdraw. The date the notification is received, is the date of withdraw. The Director of Financial Aid and/or the respective School Director 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.

#### **Unofficial Withdrawal**

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. Their date of determination is within 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.

DSDT is a clock-hour program school, and the percentage of the payment period completed is calculated by the hours scheduled in the payment period as of the withdrawal date divided by the scheduled hours in the payment period.

Unearned Title IV funds are the amount of grant and loan assistance awarded under Title IV that have not been earned by the student and must be returned to their respective program. The amount to be returned is calculated by subtracting the amount of Title IV assistance earned from the amount of Title IV aid that was or could have been disbursed as of the withdrawal date. For example, if you complete 30% of your payment period, you earn 30% of the assistance you were originally scheduled to receive.

**\*If the resulting percentage is greater than 60% a student is considered to have earned all aid. \***

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

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.\*

### **Overpayment**

Any amount of unearned grant funds that you must return is called overpayment.

Occasionally and R2T4 results in an overpayment that a student is required to return to a grant or loan program. Grant over payments of \$50 or less do not have to be returned.

A student who owes an overpayment remains eligible for Title IV, HEA program funds during and beyond 45 days from the date the school sends a notification to the student of overpayment, or 45 days from the date the school was required to notify the student of the overpayment if, during those 45 days the student:

- Repays the overpayment in full to the school;
- Enters into a repayment agreement with the school in accordance with repayment arrangements satisfactory to the school; or
- Signs a repayment agreement with the Department, which will include terms that permit a student to repay the overpayment while maintaining his/ her eligibility for Title IV, HEA program funds.

Within 30 days of the date of the school's determination that the student withdrew, an institution must send a notice to any student who owes a Title IV, HEA grant overpayment as a result of the student's withdrawal from the school in order to recover the overpayment.

If the student does not repay the overpayment in full to the school, or enter a repayment agreement with the school or the Department within the earlier of 45 days from the date the school sends notification to the student of overpayment, or 45 days from the date the school was required to notify the student of the overpayment.

At any time the student fails to meet the terms of the repayment agreement with the school:

- The student chooses to enter into a repayment agreement with the Department.
- The student who owes an overpayment is ineligible for Title IV HEA program funds.

You must make arrangement with the school or Department of Education to return the amount of unearned grant funds.

### **Credit Balance**

If a credit balance still exists on the student's account after the R2T4 calculations and institutional refund calculations are done, any credit balance remaining on a student account must be used to pay a grant overpayment that exists prior to offering any grant overpayment that exists within 14 days from the date that

the R2T4 calculation was performed. The overpayment must be eliminated prior to offering a credit balance to a student.

If you, your parent, or DSDT receives on your behalf excess Title IV program funds that must be returned, DSDT must return a portion of the excess funds equal to the lesser of:

1. Your institutional charges multiplied by the unearned percentage of your funds, or
2. The entire amount of excess funds

DSDT must return this amount of your Title IV program funds. If DSDT is not required to return all the excess funds, you may be required to return the remaining amount.

Funds that are returned to the federal government are used to reduce your outstanding balances of your Title IV program funds.

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

Responsibilities of the following parties:

#### *Financial Aid Representative*

- Place updated copies in the Financial Aid folder (student ledger, sign in sheet, withdrawal letters, notices, etc.)
- Transfers file from active to the non-active
- Files the folder to the non-active file.

#### *Business Office*

- School alerts third party of withdrawal and/or termination.
- DSDT calculates the R2T4.
- Submits notification to the Third-party servicer of request to return monies owed based on R2T4 calculations in writing.
- Submits return within 14 days of the withdrawal.
- Submits notification to the student the amount of return monies based on R2T4 calculations in writing.
- Ensure monies returned is in the proper account for retrieval.
- Print updated Student Ledger Sheet for Educational Department and Financial Aid files.

#### *Campus Director*

- Process the withdrawal according to guidelines.
- Alert Financial Aid to the student's DOD, and LDA
- Print an updated attendance record for Financial Aid and Department of Education file.
- Alert instructor of the withdrawal for final grades.

### **High School Diploma Verification Policy**

#### **Admission Requirements for Students with a High School Diploma:**

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.

Students must also be able to provide proof of appropriate educational requirement such as;

1. High school diploma
2. Homeschooling

Though homeschooled students are 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.

3. **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.**)
4. **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 **official completion** documentation demonstrating that the student has passed a state-authorized examination (such as the Test Assessing Secondary Completion (TASC) the High School Equivalency Test (HiSET), 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);

*Diploma mill definition - An entity that:*

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

### **High School Diploma Verification Procedure**

Responsibilities of the following parties: To ensure admission process is carried out.

*Admissions Representative*

- Verify all High School Diploma for state in which the HSD/ GED is located in.
- Verify Foreign High School Diploma or transcripts by requesting course description from high school and or outsourcing a company to validate the equivalency of the diploma.
- Diploma mills and Ability to Benefit are not accepted.

### **Foreign High School Verification Policy**

**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.**) High school diplomas/transcripts from other countries are acceptable toward the student eligibility general requirement, if the diploma is equivalent to a U.S. high school diploma. All foreign diplomas will be evaluated at the expense of the student by a third-party company experienced and credentialed. This policy is for all non-Title IV programs.

### **Title IV Programs 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.**)

Student's transcripts will be evaluated by a third-party company who is credentialed in the process will examine the transcript for equivalency. Students applying for federal aid will not be required be charged a fee

by the school for the evaluation process because that would amount to the school charging a fee to complete the FAFSA, which is prohibited under HEA 483(a)(6). In such cases, because the cost of evaluating a foreign credential is incurred as a charge of admission prior to enrollment in an eligible program, it cannot be included in students' cost of attendance (COA).

If the student is selected for verification tracking groups V4 or V5, in which the student must provide proof of high school completion, when it is impossible for a refugee, asylee or victim of human trafficking to obtain documentation of his or her completion of a secondary school education in a foreign country, you may accept self-certification that they have completed a high school (or equivalent) education from these applicants, along with their entry status documentation that demonstrates the applicant's current or prior status as a refugee, asylee, or victim of human trafficking who entered the U.S. after the age of 15.

### **Foreign High School Verification Procedure**

Responsibilities of the following parties:

#### *Admissions/Financial Aid Representative*

- Accept the diploma
- Accept payment for evaluation if student is not a Title IV, HEA student
- Submit diploma for evaluation to third party servicer if student is a Title IV student
- Notify student of outcome in writing of the evaluation.
- Notify FA if student is a Title IV, HEA student.

### **State Grievance Policy**

A grievance is a just or supposed basis for complaint arising out of any alleged unauthorized or unjustified act or decision made by a member of the Grievance committee that in any way adversely affects the status, rights, or privileges of a student. An aggrieved student may complain to the administration to correct the problem. The burden of proof is on the individual who submits a complaint. The grievance process is not the correct means for appealing disciplinary actions, for contesting a grade, or appealing an academic decision.

(See separate policies within the Catalog and/or Student Handbook.)

### **GRIEVANCE POLICY**

#### **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 at the main location 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 School Director at the respective main or branch campus locations. The student must make a request within 3 working days of the incident.

Stage 3: The Grievance Meeting- the Director of Administration at the main location 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 within 5 working days-notice of the 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 respective School 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 respective School 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. 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. 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](http://www.council.org).

**Or**

State of Michigan  
Department of Labor and Economic Opportunity  
Employment & Training, Post-Secondary Schools  
P.O. Box 30805  
Lansing, MI 48933  
Phone: 517-335-4000  
Fax: 517-241-9846  
Email: [PSS@michigan.gov](mailto:PSS@michigan.gov)  
Website: <https://www.michigan.gov/leo/bureaus-agencies/wd/pss>



**Or**

Texas Workforce Commission  
Career Schools and Colleges, Room 226T  
101 East 15<sup>th</sup> Street  
Austin, Texas 78778-0001  
Phone: (512) 936-6959  
Website: <http://csc.twc.state.tx.us/>

### **Professional Judgment Policy**

The Higher Education Act of 1992 allows financial aid Representatives to make professional judgment decisions for special or unusual family or student circumstances. These circumstances must be documented and must be analyzed on a case-by-case basis. Financial aid Representatives may treat a student with special circumstances differently than the strict application of the methodology would otherwise permit. Adjustments can either increase or decrease a student's EFC or cost of attendance. The reason for the adjustment must relate to that student's special circumstances and must be documented in the student's file.

A professional judgment adjustment may be warranted if a family member experienced a significant change of income, either upward or downward. Alternatively, the Financial Aid Representative may choose to use more recent income that the FAA believes more accurately reflects the family's current financial circumstances, i.e., the student or parent moved from part-time employment to full-time employment.

### **Professional Judgement Procedure**

Responsibilities of the following parties:

#### *Financial Aid Representative*

- Must obtain and maintain documentation of the changed circumstances supporting the Professional Judgment (PJ) decision
- Exercise PJ where appropriate, only the cases of special circumstances
- Seek the assistance of Boston Education Network when necessary

#### *Respective School Director*

- Meet with the Financial Aid Representative to review documentation
- Make the final decision based on adequate documentation

### **Verification Policy**

All students who have completed a FAFSA are subject to verification of the information submitted when completing their application. This verification must be completed before the student can receive federal aid. Verification flags are noted on a student's SAR or the ISIR received by the school.

Schools have the authority to contact students for documentation and information needed to address verification requirements and student must comply with the requested information. Student must submit the required documents requested for verification within the established timelines to maintain eligibility for federal financial aid. The verification process is in accordance to Title 34, Articles 668.51-61, of the Code of Federal Regulations (CFR). An applicant whose FAFSA information is selected for verification is required to complete verification before the Institution exercises any Professional Judgment adjustments to the applicant's cost of attendance (COA) or to the value of the data items required to calculate the EFC.

### **APPLICATIONS AND INFORMATION TO BE VERIFIED**

The Department's long-term goal is for a customized approach to verification. A menu of potential verification items for each award year will be published in the Federal Register, and the items to verify for a given application will be selected from that menu and indicated on the student's output documents. Output documents will continue to include only one verification flag to show students who were selected, and they will need to verify all the FAFSA items shown in the margin that apply to them. The verification flag will have

a value of “Y,” and next to the EFC will be an asterisk referring to a comment in the student section of the SAR that tells applicants they will be asked by their schools to provide documentation. A verification tracking flag will be set on the applicant’s Institutional Student Information Record (ISIR) to indicate placement in one of the current award year verification tracking groups.

In some cases, DSDT, not the CPS, will select a student for verification. DSDT must verify any information DSDT has, if/ any, reason to believe is incorrect on any application. At DSDT discretion, we may require a student to verify any FAFSA information and to provide any reasonable documentation in accordance with consistently applied school policies. In either situation DSDT may, but are not required to, include any of the current award year CPS verification items not already included. Even DSDT doesn’t select for verification, students with these applications are considered selected for verification and, as with CPS-selected applications, all other verification requirements, such as deadlines, allowable tolerances, and interim disbursement rules, apply.

Verification items for current award year 34 CFR 668.56 The verification items for current award year remain for current award year:

- Adjusted gross income (AGI)
- U.S. income tax paid
- Education credits
- Untaxed portions of IRA distributions
- Untaxed portions of pensions
- IRA deductions and payments
- Tax-exempt interest
- Income earned from work
- Household size
- Number in college
- Identity/statement of educational purpose

Verification tracking groups Students who are selected for verification will be placed in one of the following groups to determine which FAFSA information must be verified.

V1—Standard Verification Group. Students in this group must verify the following if they are tax filers:

- Adjusted gross income
- U.S. income tax paid
- Untaxed portions of IRA distributions
- Untaxed portions of pensions
- IRA deductions and payments
- Tax-exempt interest income
- Education credits
- Household size
- Number in college

Students who are **not tax filers** must verify the following:

- Income earned from work
- Household size
- Number in college

**V4—Custom Verification Group.** Students must verify identity/statement of educational purpose (SEP).

**V5—Aggregate Verification Group.** Students must verify identity/SEP in addition to the items in the Standard Verification Group (V1).

Groups V2, V3, and V6 are reserved for future use by the Department.

### Changing tracking groups

A student may move from Verification Tracking Group V1 or V4 to group V5 based on corrections made to his or her CPS record or on other information available to the Department. If verification was already completed for the previous group, the student is only required to verify the V5 information that was not already verified. If verification was not completed for the previous group, the student needs to verify all the V5 information. No disbursements of Title IV aid may be made until the V5 verification is satisfactorily completed. If the student doesn't complete verification, the school is not liable for any Title IV aid it disbursed prior to receiving the group V5 ISIR. The student is liable for the full amount because without verification there is no evidence, he or she was eligible for that aid.

If the applicant doesn't complete verification, the school is not liable for any Title IV aid it disbursed prior to receiving the group V5 ISIR. The applicant is liable for the full amount because without verification there is no evidence, she was eligible for that aid.

### Reporting results for groups V4 and V5

DSDT must report the verification results of identity for any student for whom you (1) receive an ISIR with tracking flag V4 or V5—*as selected by the CPS, not DSDT*—and (2) request verification documentation. You report this information on the FAA Access to CPS Online website **no more than 60 days** following your first request to the student for documentation of identity. If there is a change in a result you have already submitted, you can submit the new code using the above process and must make that change **within 30 days** of becoming aware that a change occurred.

### *Verification for confined or incarcerated students*

The Consolidated Appropriations Act, 2021 added section 484(t) to the Higher Education Act of 1965, as amended (HEA) to formally establish Pell Grant eligibility for confined or incarcerated students, if they are enrolled in a prison education program as defined under the HEA. The Department is currently in the process of establishing regulations to implement the statutory requirements, which will be effective July 1, 2023.

For the 2023-24 award year, a confined or incarcerated student as indicated through the new incarcerated applicant flag will only be required to verify their identity and statement of educational purpose if selected for Verification Tracking Group V4 or V5. In addition, institutions are not required to verify a confined or incarcerated student selected under Verification Tracking Flag V1. See [GEN-22-09](#) for additional information on verification requirements for confined or incarcerated students.

There are times when DSDT doesn't need to verify a student's application. DSDT is, however, still required to resolve conflicting information.

You don't have to verify FAFSA information of a student in the following situations:

- ***Death of the student.*** You don't have to continue verification if you made an interim disbursement and the student died before verification was completed. You cannot make any additional disbursements, except for FWS funds already earned, to any of the student's beneficiaries. You cannot originate or disburse his or her Direct Subsidized Loan or consider any interim disbursement you made of Pell or FSEOG funds or provisional FWS employment to be an overpayment.
- ***Not an aid recipient.*** The student won't receive Title IV aid for reasons other than a failure to complete verification. This includes being ineligible for that aid and withdrawing without receiving it.
- ***The applicant is eligible to receive only unsubsidized student financial assistance.*** However, students selected for V4 or V5 verification should complete it in accord with the answer to DOC-Q18 on the [verification Q and A page](#).
- ***Applicant verified by another school.*** The student completed verification for the current award year at another school before transferring. His or her FAFSA data must be the same as it was at

the previous school, and you must get a letter from that school stating that it verified the student's application and providing the transaction number of the pertinent valid ISIR.

- **Post enrollment.** The student was selected for verification **after** ceasing to be enrolled at your school, he or she does not intend to reenroll for the award year, and no further (including late) disbursements will be made.

Unless DSDT has reason to believe it is inaccurate, DSDT doesn't have to verify the reported FAFSA information of the **parents of a dependent student** if any of the following apply (including in cases where there is only one parent):

Both parents are mentally incapacitated.

Both parents or the custodial parent has died.

They are residing in a country other than the United States and can't be contacted by normal means.

They can't be located because the student does not have and cannot get their contact information.

Unless you have reason to believe it is inaccurate, DSDT doesn't have to verify the reported FAFSA information of the **spouse of an independent student** if any of the following apply:

The spouse has died.

The spouse is mentally incapacitated.

The spouse is residing in a country other than the United States and can't be contacted by normal means.

The spouse can't be located because the student does not have and cannot get his or her contact information.

### **Verification following disasters**

The Secretary will not enforce the verification requirements during the award year for applicants whose records were lost or destroyed because of a disaster if the school has tried to preserve and reconstruct any records. The school must document when it does not perform verification for this reason and use status code "S" when reporting the disbursement of Pell Grants to affected students. Also, the requirement for dependent students to submit a statement signed by a parent regarding household size and number in college is waived if the parents cannot provide the signature due to the disaster. The school must note why no parent was able to provide the statement.

### **HEROES Act modifications**

Provides for the modification and waiving of some statutory and regulatory provisions related to students who receive financial aid and who are on active duty during a war or other military operation or who reside or are employed in a declared disaster area. These adjustments apply to return of funds and signature requirements for verification and application, among other things. The most recent update to the HEROES Act authorized its provisions through September 30, 2017. See pages 59311–59318 of the Federal Register dated September 27, 2012, for the details on the act and a list of the eligible students.

### **Death of the student**

You don't have to continue verification if you made an interim disbursement and the student died before verification was completed. You cannot make any additional disbursements, except for FWS funds already earned, to any of the student's beneficiaries. You cannot originate or disburse his Direct Subsidized Loan or consider any interim disbursement you made of Pell, Perkins, or FSEOG funds or provisional FWS employment to be an overpayment.

### **Not an aid recipient**

The student won't receive Title IV aid for reasons other than a failure to complete verification. This includes being ineligible for that aid and withdrawing without receiving it.

The applicant is eligible to receive only unsubsidized student financial assistance.

Applicant verified by another school- The student completed verification for the current award year at another school before transferring. Her FAFSA data must be the same as it was at the previous school, and you must

get a letter from that school stating that it verified her application and providing the transaction number of the pertinent valid ISIR.

### **Post enrollment**

The student was selected for verification after ceasing to be enrolled at your school and all (including late) disbursements were made.

### **Verification exclusions 34 CFR 668.54(b)**

- Both parents are mentally incapacitated.
- Both parents and the custodial parent has died.
- They are residing in a country other than the United States and can't be contacted by normal means.
- They can't be located because the student does not have and cannot get their contact information.
- Unless you have reason to believe it is inaccurate, you don't have to verify the reported FAFSA information of the spouse of an independent student if any of the following apply:
  - The spouse has died.
  - He is mentally incapacitated.
  - He is residing in a country other than the United States and can't be contacted by normal means.
  - He can't be located because the student does not have and cannot get his contact information.

### **Verification Procedure**

Responsibilities of the following parties:

#### *Financial Aid Representative*

- Notify the student that they have been selected for verification via email and/or phone call.
- Provide required documentation to satisfy the requirement.
- Set a deadline for student to submit necessary documents clarify conflicting information. The deadline is to have documents in well in advance to receive an award letter prior to the start date. If they don't have an award letter prior to start date, they will be moved to the next round of enrollment.
- Correct information as needed.
- Notify the student that of the results of the verification, if, the applicant's EFC changes and results in a change in Title IV totals via email and/or phone call.

### **STANDARD PROCEDURES FOR REFERRING A STUDENT TO THE OFFICE OF INSPECTOR GENERAL UNDER 34 C.F.R. § 668.16 (G)**

The Financial Aid Office will report any suspected fraud or falsified information on the part of the student, parent, or preparer of the FAFSA to the U.S. Department of Education as instructed in the Federal Financial Aid Handbook.

### **Conflict Information Policy**

Applications are selected for verification either by the CPS or by the school. The student's ISIR shows an asterisk next to the EFC, in the upper right-hand section of the ISIR. Comments are found in the student section of page 1. The asterisk indicates to applicants that they will be required to provide certain financial documents and family information. Beginning with the 2019-20 Award Year, the student/parent may ask the IRS to update information on the FAFSA with IRS tax information which eliminates the need to collect tax returns. If the student has not asked the IRS to update the information on the ISIR, the student/parent will be asked to provide tax transcripts. On page 3 of the ISIR, below the dotted line on the right side there will be a Verification Tracking Flag, V-1 through V-6 which indicates the verification information which must be collected.

The DSDT Financial Aid Representative must verify any application information that it has reason to believe is incorrect or discrepant. These applications are selected for verification by DSDT even though it may not be verifying the same data as for the CPS selected applicants.

Even if the student is not selected for verification, inconsistent information must be resolved.

### **Confliction Information Procedure**

Responsibilities of the following parties:

#### *Financial Aid Representative*

- Verify information provided on the student's pre-enrollment application form, ISIR and on the Taxes.
- Notify students of conflicting information and allow them 5-7 business days to provide documentation correction or proving the information provided (except for extenuating circumstances with the approval of director and/or financial aid representative)
- Ask students to make any corrections that is conflicting such as number of dependents on taxes and number of dependents on ISIR or marital status.
- Correct errors or inconsistencies and once ISIR is received with all changes, aid may be disbursed.
- Notify student of changes due to corrected ISIR
- Submit award letter to student

### **Citizenship & Immigration Status Policy**

A student must be one of the following to be eligible to receive federal student aid:

- A U.S. citizen or national;
- A U.S. permanent resident or other eligible noncitizen
- A citizen of the Freely Associated States

If a student must prove his status as a U.S. citizen or national, only certain types of documents are acceptable. A Social Security card or driver's license isn't acceptable for documenting U.S. citizenship or national status since noncitizens and non-nationals can also have these forms of identification. "Enhanced" driver's licenses (provided by a limited number of states to permit non-air travel entry to the U.S. from Canada, Mexico, and the Caribbean) are also not acceptable.

Before DSDT can disburse aid, the student must present documentation that verifies he is a U.S. citizen. If the documents indicate that the student is a U.S. citizen or national, DSDT may award and disburse aid to the student and the C-code may remain on the student's ISIR. Unlike the case of eligible noncitizens, DSDT doesn't submit the documents to tDHS/USCIS or any other agency for verification of U.S. citizenship, but DSDT must keep a copy of the documentation in the student's file. Older versions of the Certificate of Citizenship and of the Certificate of Naturalization instruct the holder not to photocopy them. The student can also contact the Social Security Administration to update its record. This updating is not required to receive aid. If the student presents acceptable documentation, the C code can remain on the student's record.

The Department doesn't specify all the acceptable documents, but here are some documents DSDT may consider:

- A copy of the student's birth certificate showing that the student was born in the United States, which includes Puerto Rico (on or after January 13, 1941), Guam, the U.S. Virgin Islands (on or after January 17, 1917), American Samoa, Swains Island, or the Northern Mariana Islands, unless the person was born to foreign diplomats residing in the U.S. If a student has a birth certificate from a U.S. jurisdiction showing that the student was born abroad (i.e., not in the U.S. or its territories), that birth certificate is not acceptable documentation.
- A U.S. passport, current or expired, (except "limited" passports, which are typically issued for short periods such as a year and which don't receive as much scrutiny as a regular passport when applying). In the case of nationals who are not citizens, the passport will be stamped "Noncitizen National."

Five-year-duration U.S. passports (commonly issued to younger students) are considered acceptable documentation and are not considered “limited”. Passport cards are also acceptable; however, one-year-duration U.S. passports are NOT acceptable documentation.

- The State Department issues a wallet-sized passport card that can only be used for land and sea travel between the United States and Canada, Mexico, the Caribbean, and Bermuda. It is adjudicated to the same standards as the passport book and is therefore a fully valid attestation of the U.S. citizenship and identity of the bearer.
- A copy of Form FS-240 (Consular Report of Birth Abroad), FS-545 (Certificate of birth issued by a Foreign Service post), or DS-1350 (Certification of Report of Birth). These are State Department documents.
- A Certificate of Citizenship (N-560 or N-561) issued by USCIS to individuals who derive U.S. citizenship through a parent.
- A Certificate of Naturalization (N-550 or N-570) issued by USCIS (or, prior to 1991, a federal or state court), or through administrative naturalization after December 1990 to those who are individually naturalized.

### **Citizenship & Immigration Status Procedure**

Responsibilities of the following parties:

#### *Financial Aid Representative*

- Alert the student of the documents needed for verification
- Verify the documents
- Place a copy of the documents in the FA and student records

### **DHS-SAVE Instructions for U.S. Department of Education**

The State of Michigan will not provide a certificate of completion or award a diploma to any student that has been convicted of a crime; committed any act involving dishonesty, fraud, or deceit; or a crime; committed any act that, if committed by a graduate of the business or profession in question. Students who are not U.S. Citizens or who do not have documented authority to work in the United States will not be eligible to attend DSDT. DSDT does not use the SAVE Third Step Verification of Eligible Noncitizen Status due to DSDT not currently offering eligibility status to non-citizens. DSDT, the school, is not responsible for students denied work without proper documentation showing proof of citizenship. DSDT does not admit students to English-as-a-second language courses.

### **Academic Year Definition Policy**

For purposes of defining an academic year, a week is a consecutive seven-day period; a week of instructional time is any week in which at least one day of regularly scheduled instruction or examinations occurs or, after the last scheduled day of classes for a term or payment period, at least one day of study for final examinations occurs; and instructional time does not include any vacation periods, homework, or periods of orientation or counseling.

For a program that measures program length in clock hours, a minimum of 30 weeks of instructional time and 900 clock hours.

DSDT offers a diploma program that measures program length in 600 clock hours, (Full time, 20, hrs./wk.) a minimum of 31 weeks of instructional time.

### **Academic Year Definition Procedures**

Responsibilities of the following parties:

#### *Admission/Financial Representative*

- Communicate to students what an academic year is in clock hours

### **Leave of Absence Policy**

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 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 later 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/Representative 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 initialed by all parties. If the student does not return the withdrawal date for the purpose of calculating a refund is always 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 any and all absences recorded, regardless of circumstances.

### **Leave of Absence Procedures**

Responsibilities of the following parties:

#### *Respective 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 original contract to make sure it is the same amount 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 with a twelve-month period.
- Make sure an addendum is made to student contract.
- Return with request days of actual leave of absence

### **Student Right-To-Know Act Policy**

Federal regulations and the Student Right-to-Know Act require institutions participating in Federal Student Aid to provide additional disclosures to students. It is designed to inform current and prospective students and their parents about information that is vital to understanding their rights and responsibilities and the policies of DSDT.

The disclosures include:

Completion/Graduation Rates

Licensure Rates

Placement Rates

Student Body Diversity Data

Information related to these required disclosures will be available to all current and prospective students by July 1 each year via the DSDT's student handbook. Paper copies of this information are available upon request from the School Director. This information is located on the College Navigation website at:

<https://nces.ed.gov/collegenavigator/?q=dsdt&s=all&id=492139>.

### **Student Right-to-Know Procedure**

Responsibilities of the following parties:

*Admissions Representative*

- Will inform perspective students of their rights and given appropriate handouts during the enrollment process or alert them to website with the proper information. Paper copy is available in FA office if student request a copy.
- Enrollment packet
- Clery Information
- FERPA forms
- Drug and Alcohol Policies and Procedures
- Consumer Information

*Respective School Director*

- Will send out FERPA form links yearly in January for all current students
- Will review and update the website every six months in May and December with Consumer information as needed
- Will post and DISTRIBUTE Clery information to students every year by Oct 1<sup>st</sup> as well as update the DSDT.edu website with the three most current award years.
- Will make available the Drug and Alcohol Policy and Drug and Alcohol Abuse Prevention Program yearly in February and update the website
- Will review and update policies in the Consumer Handbook every year in November.
- Will ensure the annual Clery Survey is completed and submitted by 1 October of each year.

*Financial Aid Representative and/or Respective School Director*

- Will share with new students the consumer information and student's right to know information during orientation through
- Power Point Presentations/Paper copy if available and requested
- Website/Students will sign an acknowledgement page verifying viewing this information

## Facilities & Services for Students with Disabilities Policy

### Students with Disabilities

DSDT does not discriminate against students and applicants based on disability, in the administration of its educational and other programs. DSDT reasonably accommodates qualified students (including applicants) with disabilities as defined by applicable law, if the individual is otherwise qualified to meet the fundamental requirements and aspects of the program of DSDT, without undue hardship to DSDT. For purposes of reasonable accommodation, a student or applicant with a disability is a person who has learning, physical or psychological impairment which limits one or more major life activities (such as walking, seeing, speaking, learning, or working).

### Facilities & Services for Students with Disabilities Procedure

Responsibilities of the following parties:

#### *Admission Representative*

- Notifies the student of the option to share their disability on their medical history form.
- Encourages the student to provide the necessary documentation outlining his or her disability.

#### *Respective School Director*

- Evaluates if DSDT can accommodate and can give reasonable accommodations.
- If reasonable accommodations can be met, DSDT will complete an accommodations page, submit a copy to the instructor, one to the student, and the other in the student's file.
- If reasonable accommodations cannot be met by DSDT, the student will be referred to additional resources for assistance in providing such accommodations either with DSDT or with a different institution.

## Copyright Infringement Policies and Sanctions

DSDT takes Copyrighting Infringement very seriously. Whether it be distribution of Copyrighted material or unauthorized peer-to-peer file sharing, may subject the students to civil and criminal liabilities.

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

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

Willful copyright infringement can also result in criminal penalties, including imprisonment of up to five years and fines of up to **\$250,000** per offense. For more information, please see the website of the U.S. Copyright Office at ([www.copyright.gov](http://www.copyright.gov)).

Works protected by copyright may be copied only with the copyright holder's permission, unless the copying is considered a "fair use". The Copyright Act provides for but does not clearly demarcate the boundaries of fair use. Thus, a determination using the available standards and guidelines should be undertaken before making copies of a copyrighted work without permission of the copyright holder.

### Copyright Infringement Procedure

Responsibilities of the following parties:

#### Instructors and Administrative Staff

- Instructors must use the textbooks and workbooks provided to each student

- There shall not be copying from workbooks, exercises, standardized test booklets answer sheets, or a similar material intended to be consumed in the course of study or teaching.
- In the event of obtaining permission to copy, the following steps must be taken:
  1. Obtain Name and Address of Owner/Controller Determine who holds the copyright to the material. The page containing a notice of copyright can help you determine who holds the copyright, the year of publication and the publisher's address. The acknowledgement page may also contain information regarding copyright ownership or control.
  2. Request Permission to Duplicate. A request containing the information listed below should be sent to the permission department of the publisher in question. Provide complete and accurate information regarding the work to be duplicated such as:
    - Title, author and/or editor; copyright or publication date and edition of the book in which the materials to be duplicated appear;
    - Exact material to be used, giving amount, page numbers, chapters and, if possible, a photocopy of the material and title and copyright page;
    - Number of copies to be made;
    - Use to be made of duplicated materials and form of distribution (e.g., as course material and whether collected with other excerpts or materials, whether bound or unbound);
    - Whether the material is to be sold,
    - Type of reprint (ditto, photocopy, offset, typeset).
- Prior to making the copies, the information above must be submitted to the Director. After verification, only then can copies be made.
- In order to monitor this policy and procedures, all printing and copying are limited to under 500 copies for each instructor per month. Additionally, all copies are reviewed by the administrative staff member as copies are obtained from the copy machine located in the FA Department.
- Material may be posted to a password protected learning management system (LMS) such as Canvas WITHOUT PERMISSION only if the following conditions are met:
  - The instructor owns the copyright. NOTE: Authors of academic papers are often required to transfer copyright to publishers, and therefore retain no rights in the work. In this case, permission to post a digital copy must be obtained from the publisher
  - The College has a license in place that permits posting to an LMS (examples include library databases and NBC Learn)
  - A publisher has provided digital supplements (ePacks, course packs, course cartridges) with a textbook and the license explicitly permits posting to an LMS, or WRITTEN permission has been obtained from the publisher
  - The material has been obtained under a Creative Commons license or from Open Access sources: Creative Commons: <http://creativecommons.org/> or Open Access Journals: <http://www.doaj.org/>
  - The material is in the public domain. Material enters the Public Domain 50 years from the death of the author(s) (or translator)
  - Federal documents and publications are NOT eligible to be copyrighted so they may be used without written permission
- Access to audio/video recordings that are on the public Internet, such as those found on YouTube should be provided using a link rather than by uploading a file directly to the LMS. Additionally, the Perusal application within canvas will enable access of materials such as textbooks, videos, websites, and audio files and prevent downloading and copyright infringement.
- Access to online resources is provided via links rather than uploading the items directly into the LMS

- Published material that is not covered by a suitable license, not in the public domain, and not available through a Creative Commons or Open-Source provider, should not be uploaded to the course
- Copies of published worksheets or other materials intended as “consumables” by students (i.e., study guides, workbooks, etc.), or any copyrighted book or video in its entirety, should not be included in the LMS without obtaining appropriate written permission
- After ensuring that copyrighted material can be legally used in a course, the instructor should include a citation of the original source and a copyright notice

Copyright compliance in a course is ultimately the responsibility of the instructor delivering that course. The following information is intended to aid with compliance. A simple breakdown of copyright law can be found here and should be placed in each course to aid students and faculty:  
<https://www.copyright.gov/title17/title17.pdf>.

### **School Program Accreditation Policy**

DSDT was awarded its National Accreditation from the Council on Occupational Education and adheres to the rules, regulations and standards of quality of the Commission.

### **School Accreditation Procedure**

Responsibilities of the following parties:

*Main Campus School Director*

- Review the Institutional Self Study yearly updating areas in need.
- Oversee the planning of all in-services required by state and accreditation agencies
- Maintain the COE (Council on Occupation Education) accreditation folder with all necessary documents
- Submit all documents for new employees and programs for approval when necessary.
- Submit all documents needed for Reporting information
  - Annual Report data- - December of each year for COE Graduation data- - December of each year for COE
  - Placement data- - December of each year for COE
  - Licensure/certification Rates- - December of each year for COE

### **Licensure Policy**

DSDT is licensed by the LARA and adheres to the rules and regulation of LARA.

### **School State Approval Procedure**

**Policy:** See above policy

**Purpose:** To ensure that DSDT remains in the guidelines of the accreditation agency guidelines and state approvals.

Responsibilities of the following parties:

*Main Campus School Director*

- Oversee the planning of all in-services required by state and accreditation agencies
- Submit all documents for new employees and programs for approvals.
- Submit all documents needed for Reporting information

Graduation data- November of each year for LARA

Auditing data- November of each year for e-Z audit

### **School Program Accreditation Procedure**

Responsibilities of the following parties:

#### Main Campus *School Director*

- Review the Self Study yearly updating areas in need.
- Oversee the planning of all in-services required by state and accreditation agencies
- Submit all documents for new employees and programs for approvals when necessary.
- Submit all documents needed for Reporting information
  - CPL data- December of each year for COE June of each year for LARA
  - Graduation data- December of each year for COE June of each year for LARA
- Auditing data-
  - December of each year for COE
  - April of each year of DOE
  - June of each year for LARA

#### **Voter Registration Policy**

DSDT must make the voter registration forms widely available to its students. It must individually distribute the forms to its degree- or certificate-seeking (Federal Student Aid-eligible) students. The school can mail paper copies, or, alternatively, it may distribute voter registration forms by electronically transmitting to each student a message containing an acceptable voter registration form or an Internet address where that form can be downloaded.

The electronic message must be devoted exclusively to voter registration. In states where this condition applies, schools must request voter registration forms from the state 120 days prior to the state's deadline for registering to vote. This provision applies to general and special elections for federal office and to the elections of governors and other chief executives within a state. If a school does not receive the forms within 60 days prior to the deadline for registering to vote in the state, it is not liable for failing to meet the requirement during that election year.

#### **Voter Registration Procedure**

Responsibilities of the following parties:

##### *Admissions Representative*

- Ensure that voter registration forms are in all perspective student's enrollment packet
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##### *Financial Aid Representative*

- Guide new students to the website giving them access to the voting registry link during every orientation
- Have students sign the acknowledgment page

#### **IPEDS Policy**

The information on completion, graduation rates and, if applicable, transfer-out rates must be made available by the July 1 immediately following the 12-month period ending August 31 during which the expiration of 150% of normal time took place for the group of students on which DSDT bases its completion and transfer-out rate calculation.

Schools must disseminate the information on completion or graduation and, if applicable, transfer-out rates to enrolled and prospective students upon request, through appropriate publications, mailings, or electronic media (for example, school catalogs or admissions literature). DSDT provides hard copies to other interested parties, upon request.

#### **IPEDS Procedure**

Responsibilities of the following parties:

##### *Director of Financial Aid*

- Will input the data required into the Database during the reporting periods
  - Data will be gathered through electronic means and physical means by the School Director along with other administrative support
- Will input the data required into the IPEDs reporting system during the reporting periods.

- A binder will be kept in the Director's office with the necessary documents supporting the IPEDS reporting data until such data is available electronically.
- Will ensure the reporting data is uploaded to the DSDT.edu website for review along with the following links.
  - College Navigator
  - Net Price Calculator

### **Constitution & Citizenship Day Policy**

In 2004, Congress passed a provision that every school and college that receives federal funding must teach students about Constitution of the United States each year on September 17, the day this historical document was adopted in 1787. Each year on September 17 (or the 16<sup>th</sup> or 18<sup>th</sup> if the 17<sup>th</sup> falls on a weekend) holds a Constitution Assembly for its students. The students are exposed to elements of the Constitution through creativity, classroom involvement, and break time activities. Each instructor is required to add an element of instruction that involves the Constitution into their daily lesson plan.

### **Constitution & Citizenship Day Procedure**

**Policy:** See above policy

**Purpose:** To provide education of the importance of Constitution Day

Responsibilities of the following parties:

#### *Instructors*

- Have each instructor share information from the Constitution books in the classroom ice breaker
- Conduct school wide informational activities to inform students of the Constitution day. (power point presentation)

#### *Director of Financial Aid*

- Order Cake for Refreshments two days prior to event (optional)
- Decorate the schools with Flags the day before the event
- Place order using requisition for Flags, etc.
- Have instructors present about Constitution Day
- Design a school song play list with American focus songs in DSDT lobby

### **Gainful Employment Policy Review**

#### **Gainful Employment Disclosures**

**Please note:** As of July 2019, these disclosures are no longer in effect based on recent rulemaking action by the U.S. Department of Education.

### **Gainful Employment Procedure**

Responsibilities of the following parties:

#### *Main Campus School Director*

- Ensure DSDT is complying with the department of education's rules and regulation changes as they are delivered

### **FERPA Policy**

The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99) is a Federal law that protects the privacy of student education records. The law applies to all schools that receive funds under an applicable program of the U.S. Department of Education.

FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level. Students to whom the rights have transferred are "eligible students."

Parents or eligible students have the right to inspect and review the student's education records maintained by the school. Schools are not required to provide copies of records unless, for reasons such as great distance, it is impossible for parents or eligible students to review the records. Schools may charge a fee for copies.

Parents or eligible students have the right to request that a school correct records which they believe to be inaccurate or misleading. If the school decides not to amend the record, the parent or eligible student then has the right to a formal hearing. After the hearing, if the school still decides not to amend the record, the parent or eligible student has the right to place a statement with the record setting forth his or her view about the contested information.

Generally, schools must have written permission from the parent or eligible student in order to release any information from a student's education record. However, FERPA allows schools to disclose those records, without consent, to the following parties or under the following conditions (34 CFR § 99.31):

### **FERPA Procedure**

Responsibilities of the following parties:

#### *Admissions Representative*

- To ensure that all students understand the FERPA form during the enrollment agreement and have all students completed a FERPA form during the enrollment process.

#### *Main Campus School Director or Designee*

- To release the FERPA form to all current students notifying them of their option to change or update their FERPA information. During this time, they are also updated on their FERPA rights.
- Employees are also given an in-service on FERPA, students' rights, confidentiality and the policy of the FERPA.

### **Safeguarding Consumer Information Policy**

**DSDT establishes and maintains a comprehensive information security program.** This program must include the administrative, technical, or physical safeguards the school uses to access, collect, distribute, process, protect, store, use, transmit, dispose of, or otherwise handle customer information. The safeguards achieve the following objectives:

- Ensures the security and confidentiality of customer information
- Protects against any anticipated threats or hazards to the security or integrity of such information, and
- Protects against unauthorized access to or use of such information that could result in substantial harm or inconvenience to any customer

### **Safeguarding Consumer Information Procedure**

Responsibilities of the following parties:

#### *Respective School Director*

- Oversees and manage the employee training and management of information systems of storage and transmittal of confidential information.
- Will change password codes monthly to programs such as Online testing system (if applicable) and share with staff members who need access to the system.

#### *All Staff*

- Will ensure that all documents containing student grades, Social Security, or personal information are shredded- (shredder located in the Director of Administration's Office)
- Will ensure that all passwords are secure and will not share their password codes with other members of the team or outside of the team.
- Will remember to log out of all computers and programs that allows access to exams and grades.

### **Direct Loan Quality Assurance Policy**

The Direct Loan Program regulations at 34 CFR 685.300(b) (9) require schools to implement and document a quality assurance process to ensure that they are complying with program requirements and meeting program objectives.

A school should have a quality assurance process in place that documents that the school is:

- Reporting loan records, disbursements, and adjustments to disbursements correctly to the Common Origination and Disbursement (COD) System,
- Disbursing and returning loan funds in accordance with regulatory requirements,
- Disbursing the correct loan amount to the correct student,
- Completing monthly reconciliation and Program Year Closeout.

### **Direct Loan Quality Assurance Procedure**

Responsibilities:

1. All reports reconciliation reports from BEN (Boston Educational Network) are compared with COD for accuracy.
2. Disbursement reporting will be conducted monthly in COD by the CFO utilizing the procedure document 'Disbursement Reporting'
3. Errors from all reports will be corrected by the financial aid director and resubmitted to our third-party servicer to change in COD.
4. The Director and Loan Officer will verify that the submitted changes processed correctly.
5. All adjustments to a student's COD record as a result of a R2T4 will be calculated, documented and submitted by the CFO utilizing the procedure document 'Withdrawal and R2T4.doc'.
6. Any return of funds to the U.S. Department of Education will be processed via DSDT's Business Office.
7. Business office will update student accounts and ledgers.
8. Monthly SAS statements from BEN's website will be obtained by the business office for loan reconciliation. These documents will then be signed by the Director of Financial Aid.
9. Year-end closeout will be undertaken by our third-party servicer, BEN and using applicable reports, DSDT confirm \$0 balance in COD.

All procedure documents will be made available to our auditor as part of the annual Financial Statement Audit.

Action Plan:

Where processes are found to be deficient, improvements and changes will be documented in the form of an action plan where procedures will be updated, and copies of documents stored electronically.

### **Net Price Calculator Policy**

DSDT set up a Net Price Calculator template, so DSDT can use to comply with one of the new requirements that was created in the Higher Education Opportunity Act of 2008. Title IV institutions are required to post a net price calculator on the DSDT.edu website. DSDT now has a Net Price Calculator that uses institutional data to provide estimated net price information to current and prospective students. The estimates that are generated by the calculator do not represent a final determination or award financial assistance or final price by the school. Rather, they are only estimated based on the cost of attendance and financial aid provided to students in any given year.

HEOA states, "The calculator shall be developed in a manner that enables prospective students, families and consumers to determine an estimate of a prospective student's individual net price at a particular institution."

The Calculator template has eight elements for the students to enter:

- Age
- Marital Status
- Family Size



- Number of family members in college
- Parents income for dependents (or household income for independents)
- Living status (on campus, off campus, or with parents)
- Residency Status (in-state or out of state)

The following is the data that the institutions must provide to populate the calculator. DSDT can add data to provide a more accurate estimate of their net price. At a minimum each institution can add data to provide a more accurate estimate of their net price. A minimum each institution must provide the following data:

- Estimated total price of attendance
- Estimated tuition and fees
- Estimated room and board
- Estimated books and supplies
- Estimated other expenses (including personal expenses and transportation)
- Total estimated merit- and need-based grant aid
- Estimated net price (price of attendance minus grant aid)

DSDT uses the department of education calculator. DSDT updates the calculator on an annual basis when new data becomes available. An institution that has any full-time, first-time students, no matter how few, must have a net price calculator.

How It Works –Institutions input the following data:

- Price of attendance
- Median amounts of grant and scholarship aid awarded to, and accepted by, first-time, full-time degree/certificate-seeking students by EFC range –Users are asked nine questions to establish the following:
  - Their dependency status
  - Their estimated cost of attendance
  - Approximated EFC

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

### **Net Price Calculator Procedures**

Responsibilities of the following parties:

#### *Financial Aid Director*

- Create Net Price Calculator
- Work with liaison/director to into data
- Counselor incoming students to view the Net Price Calculator
- Update the Net Price Calculator annually

#### *School Director*

- Make sure the Net Price Calculator is updated

### **Safeguarding Consumer Info Policy**

Data Security Breach and Self-Report of Data Breach Requirements

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.

### **Purpose:**

As

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 Infrastructure Manager. The IM 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 IM 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 IM 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 IM 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 at either the main or branch locations, 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 Infrastructure Manager or the direct management leaves the employment of the Institution, the School Director at either the main or branch locations, shall take over the responsibilities of the Infrastructure Manager, until a new Infrastructure Manager 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 at either the main or branch locations and Infrastructure Manager 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 Infrastructure Manager 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 Infrastructure Manager.

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 Infrastructure Manager.
- 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 Infrastructure Manager.
- The Infrastructure Manager 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 School Director at either the main or branch locations 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 Director of inventory and supply management maintains an inventory of Institution computers at both the main and branch locations, including any handheld devices or PDAs, on or through which student information may be stored, accessed or transmitted. If the Director of inventory and supply management is not available, the school director at either the main or branch locations will manage and maintain inventory procedures.

6. The Director of inventory and supply management develops and maintain appropriate oversight or audit procedures to detect the improper disclosure or theft of student information at both the main and branch locations.

## **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.

- 1) The Infrastructure Manager 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 Infrastructure Manager utilizes and maintains a working knowledge of widely available technology for the protection of student information.
- 3) The Infrastructure Manager 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 Infrastructure Manager manages the Institution's information security tools for employees and pass along updates about any security risks or breaches.
- 7) The Infrastructure Manager establishes procedures to preserve the security, confidentiality and integrity of student information in the event of a computer or other technological failure.
- 8) The Infrastructure Manager ensures that access to student information is granted only to legitimate and valid users.
- 9) The Infrastructure Manager notifies students promptly if their student information is subject to loss, damage or unauthorized access.

## **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:
  - employee training and management;
  - information systems, including network and software design, as well as information processing, storage, transmission, and disposal; and

- 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
  - 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
  - requiring your service providers by contract to implement and maintain such safeguards; and
- evaluate and adjust your school’s data security program considering
  - the results of the required testing/monitoring,
  - any material changes to your operations or business arrangements, and
  - 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](mailto: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 WinZip™, 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 (PSTN connection, physical print-out type that is the non-networked 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.

### **Disbursement for Books & Supplies Policy**

**Special provisions for books and supplies / Proration Requirements as outlined in the following Guidance: 34 CFR 668.164(c), (c)(5) and (m).**

DSDT provides PDF Versions of the books , and books are not necessary to complete the program. However, if a student would like to purchase a physical book, DSDT will follow the following guidelines. Therefore, by the seventh day of a payment period, a school must provide a way for a student who is eligible for FSA (PELL) funds to obtain or purchase the books and supplies required for the payment period if

- ten days before the beginning of the payment period, the school could have disbursed FSA funds to the student; and
- disbursement of those funds would have created an FSA credit balance.

DSDT must consider all the FSA funds a student is eligible to receive at the time it makes the determination, but the school need not consider aid from non-FSA sources.

DSDT includes the costs of books in the tuition charged and provides all the books to the students at the start of his or her classes meets the requirement of these regulations. On the seventh day of a payment period, DSDT will provide a way for a student who is eligible for PELL funds to obtain required supplies.

The amount a school must provide is the lesser of the presumed credit balance or the amount determined by the school that the student needs to obtain the books and supplies. In determining the required amount, a school may use the actual costs of books and supplies or the allowance for those materials used in estimating the student's cost of attendance for the period.

The student has the right to "opt out" to participate in the process the school provides for the student to obtain or purchase books and supplies.

If a student uses the method provided by the school to obtain or purchase books and supplies, the student is considered to have authorized the use of FSA funds, and the school does not need to obtain a written authorization for this purpose.

Authorization not required if a Pell-eligible student uses the process provided by the school to obtain books or supplies, the student is considered to have authorized the use of the FSA funds, and no written authorization is required.

Effect of Verification to be eligible to receive the disbursement for books and supplies, a student must meet all the student eligibility requirements before the start of the student's payment period.

A student who has not completed the verification process, has an unresolved "C" code on the SAR and ISIR, or has unresolved conflicting information is not covered by the special provisions for books and supplies if those issues have not been resolved at least 10 days before the start of the student's payment period.

### **30-day Delay Requirement**

If the 30-day delayed disbursement provisions for Direct Loans apply to a student, and a Direct Loan is the only Title IV aid the student is receiving, a school does not have to comply with the provisions of 34 Clarification

A school is required to provide, in its financial aid information and its notifications provided to students receiving FSA funds, information on the way the school provides for Federal Pell Grant eligible students to obtain or purchase required books and supplies by the seventh day of a payment period under certain conditions and how the student may opt out. The information must indicate whether the school will enter a charge on the student's account at the school for books and supplies or pay funds to the student directly. Also, during the financial aid counseling process, the school must explain to a student who qualifies for the funds advanced to purchase books and supplies how the method is handled at the school and how a student may opt out.

### **Disbursement for Books & Supplies Procedures**

Responsibilities of the following parties:

#### *Financial Aid Representative*

- Pell eligible students can receive their books and supplies by the 7<sup>th</sup> day of the payment period
- Make sure the cost of books and supplies are included in the tuition to obtain and purchase books and supplies during the first pay period
- Students must meet all the eligibility requirement to obtain books and supplies by the special provisions for books and supplies
- A student during the counseling process, must be informed about the funds advanced to purchase books and supplies how the method is handled at the school and how a student may opt out.
- Authorization is not required if a student use the school's method to obtain books and supplies

#### *CFO*

- Make sure the monies are available with 7 days of the payment period

### **Institutional Charges vs. Non-Institutional Charges**

The Department's longstanding guidance has been that a charge for books and supplies must be considered an institutional charge if a student does not have a real and reasonable opportunity to purchase the required course materials from any other source but the school. A student has a "real and reasonable" opportunity to obtain required course materials from another source if:

1. The required course materials are available for purchase at a relatively convenient location unaffiliated in any way with the institution; and
2. DSDT does not restrict the availability of financial aid funds, so the student can exercise the option to purchase the required course materials from alternative sources in a timely manner.

If students do not have a real and reasonable opportunity to obtain the required books, supplies, and equipment from another source, DSDT must ensure that it meets the requirements found in 34 CFR 668.164(c)(2) for including those items in tuition and fees, e.g., having an arrangement with a book publisher or other entity that enables it to make those books or supplies available to students below competitive market rates.



### **Prorating Institutional Charges**

If an institution routinely debits students' ledger accounts for the charge for books, supplies, and equipment along with tuition and fees, it is an institutional charge. We consider all institutional charges to be part of a student's tuition and fees for the purposes of implementing the regulations found in 34 CFR 668.164(c)(1)(i) relating to the crediting of a student's account. The regulations provide a specific formula for prorating charges if an institution assesses charges for more than a payment period at a time. For programs with substantially equal payment periods where DSDT charges up-front for the whole program, total institutional charges, including any books, supplies or equipment charges, must be divided by the number of payment periods in the program. For other programs, DSDT must divide the number of credit or clock hours in the payment period by the number of hours in the program and multiply the result by the total institutional charges for the program.

Regardless of whether DSDT charges for other types of tuition and fees by the payment period, the cost of books, supplies, and equipment (including kits) must be prorated when determining the amount of Title IV aid to credit for a given payment period if students do not have a real and reasonable opportunity to purchase the books, supplies, and equipment elsewhere and those items are intended for use over a greater timeframe than a payment period. In cases where an institution charges tuition and fees by payment period, but is required to prorate the cost of books, supplies, and equipment over more than one payment period, DSDT should add the cost of the books and supplies prorated under the regulatory formula to the tuition and fees it charges for the payment period when determining the amount of Title IV aid to credit to the student's account for that payment period and the amount to provide to the student as a credit balance.

### **Return of Title IV Funds Considerations**

Unless an institution receives funds under the reimbursement or heightened cash management monitoring payment methods, a student or parent may provide an optional authorization for DSDT to hold his or her Title IV credit balance refund under 34 CFR 668.165(b)(1)(ii). Under that authorization, DSDT may retain Title IV funds in excess of the prorated amount. If this occurs and the student subsequently withdraws from a non-term program measured in either clock or credit hours, under 34 CFR 668.22(g)(3) DSDT must use as "institutional charges" in Step 5 of the Return of Title IV Funds calculation, the greater of:

1. The prorated amount of the student's institutional charges as determined under **34 CFR 668.164(c)(5); or**
2. The amount of Title IV funds that DSDT retained as of the student's withdrawal date, which may exceed the prorated amount as a result of the student or parent's authorization for DSDT to retain those funds.

Additionally, when a student withdraws, the Department's longstanding guidance limits the amount of the Title IV aid that an institution must return to the Department for aid credited for certain types of unreturnable equipment, even if charges for such equipment would otherwise be considered an institutional charge under 34 CFR 668.164(c)(1)(i). When performing a Return of Title IV Funds calculation, an institution may exclude from institutional charges the total documented cost of unreturnable equipment and the documented cost of returnable equipment if not returned in good condition within 20 days of withdrawal. Note that the amount that may be excluded is the amount that DSDT actually paid for the materials, not necessarily what it charged students to purchase them.

### **Clery Information Safety and Security Annual Survey Policy**

In 1990, Congress enacted the Crime Awareness and Campus Security Act of 1990 (Title II of Public Law 101-542), which amended the Higher Education Act of 1965 (HEA). This act required all postsecondary institutions participating in HEA's Title IV student financial assistance programs to disclose campus crime statistics and security information. The act was amended in 1992, 1998, 2000 and 2008.

Under the Clery Act, the on-campus category includes the following: Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by DSDT in

direct support of, or in a manner related to, the institution's educational purposes, including residence halls; and Any building or property that is within or reasonably contiguous to the area identified in paragraph (1) of this definition, that is owned by DSDT but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor).

U.S. Department of Education, Office of Postsecondary Education, The Handbook for Campus Safety and Security Reporting, 2016 Edition, Washington, D.C., 2016.

DSDT strictly maintains and enforces the safety and security of the campus population. DSDT complies with safety and security guidelines as requested and suggested by the Crime Awareness and Security Act of 1990; The U.S Department of Education; State and Local Laws and local law enforcement agencies; and various publications. DSDT strictly forbids the possession of firearms or other weapons on school property or during school related outings. DSDT has zero tolerance policy regarding immoral conduct and enforces campus safety and security regulations pertaining to verbal, sexual, and physical harassment of a fellow student or staff member as well as threat of physical violence against a fellow student or staff member.

### **Procedure**

Responsibilities of the following parties:

#### *Main Campus School Director*

- Appoint a Campus Security Awareness (CSA) Coordinator
- Oversee the CSA Coordinator
- All incidents are evaluated by School Director and/ or CSA Coordinator
- Criminal incidents may be turned over to local authorities for further investigations.
- Due to the nature of the incident other sanctions may be implemented on the accused or the accuser.
- School must distribute by October 1 each year, a security report.
- The security report will be posted on the class bulletin.
- Yearly a one (1) hour presentation will be held in the spring to address dating violence, domestic violence, sexual assault, and stalking.

#### *Campus Security Awareness Coordinator*

- Perform yearly trainings for the CSA team's members on Crime Logs and Emergency Reporting (ER) procedures
- Submit the Crime Logs to School Director and alert Director of all criminal activities.

### **Updating Clery Policy**

The campus crime statistics is updated yearly and is made available to all perspective students, current employees, and current students. Copies of this information are duplicated and may be found available at any time. They are located:

- [www.dsdt.edu](http://www.dsdt.edu)
- Media resources room
- In Financial Aid Department Office

### **Updating Clery Procedure**

Responsibilities of the following parties:

#### *Admissions Representative*

- Alert the perspective student of the report during the enrollment process through the enrollment packet.

#### *Financial Aid Director*

- Alert current students of the report and it's components and location on the campus and the website.
- Send out alert monthly to employees, current students and prospective students.
- Release the report by Oct. 1 of each year.

- Contact local police department with a formal request via email or postal mail service requesting a crime report for the geographical location of DSDT for previous year. (Example: if we are in a current year, we should request information for the previous completed calendar year)
- Obtain the Crime Logs from the Crime Security Awareness Coordinator no later than July 1 of each year
- Contact local police department with a formal request via email or postal mail service requesting a crime report for the geographical location of DSDT for previous year. (Example: if we are in a current year, we should request information for the previous completed calendar year).
- Based on the information retrieved, compile a report with the most 3 completed years updated.
- Send out notifications to all employees and students of the newly reported report via email and text messaging.

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

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

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

- A current or former spouse or intimate partner of the victim,
- A person with whom the victim shares a child in common,
- A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner,
- A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies [under the VAWA],
- Any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction”

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

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

### **Violence Against Women Act Procedure**

Responsibilities of the following parties:

*Respective School Director, In the absence of the School Director, individuals should seek out any DSDT staff member.*

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

### **VAWA Disciplinary Hearings Policy**

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

These records are available upon request through the administrative offices.

Information for crime victims about disciplinary proceedings. DSDT will, upon written request, disclose to the alleged victim and the accuser of any crime of violence, or a non-forcible sex offense, (alleged dating violence, domestic violence, sexual assault, or stalking as defined in 34 CFR 668.46(a) the results of any disciplinary proceedings conducted by DSDT against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased because of the crime or offense, the information shall be provided, upon request to the next of kin of the alleged victim. This provision applies to any disciplinary proceeding conducted by DSDT on or after August 14, 2009.

The institutions will provide a prompt, fair, and impartial disciplinary proceeding in which

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

Note: An institution must provide simultaneous notification, in writing, to both the accuser and the accused, of:

- The result of any institutional disciplinary proceeding that arises from an allegation of dating violence, domestic violence, sexual assault, or stalking
- The school's procedures for the accused and the victim to appeal the result of the institutional disciplinary proceeding, if such procedures are available
- Any change to the result
- When such results become final

### **VAWA Disciplinary Hearings Procedure**

Responsibilities of the following parties:

#### *Student*

- Formal complaint via writing, video, or verbally
- Accuser will be notified in writing or verbally of alleged crime

#### *Respective School Director*

- Report allegation to official authorities DSDT and/ or law enforcement (may be optional)
- DSDT and/or Law enforcement conducts a full investigation of allegations along with collection of evidence
- Possible sanctions during investigation may include suspensions, Leave of Absence, or change in program section until investigation is complete.
- Victim may have the option of utilizing Victim Rights (see rights on Financial Aid website)
- Based on the findings made by law enforcement DSDT, a written notice will be issued to the accuser and the victim of the outcome.

### **VAWA Collecting Data Policy**

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

### **VAWA Collecting Data Procedure**

**Purpose:** To gather data and documentation of crimes.

Responsibilities of the following parties:

#### *CSA Coordinator*

- Collect data yearly via Crime logs
- Submit logs to School Director monthly

#### *Respective School Director*

- Reviews the logs
- Ensures that all incidents have been reported to local officials
- Contacts the local law enforcement by July each year via email for the information for the annual report
- Compile the information for the annual report
- Updates the information
- Submits by October 1 to Clergy department, current students, and employees.

### **VAWA Prevention & Awareness Policy**

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

### **VAWA Prevention & Awareness Procedure**

Responsibilities of the following parties:

#### *Financial Aid Representative*

- Contacts the local battered women's shelter or qualified counselor to schedule a presentation to address the students during an assembly.
- Place order to any promotional items at least a month in advance, if desired
- Ensure that each students and employee signs the sign in sheet.

#### *Instructors*

- Prepare lesson plans to incorporate 1 hour for a presentation on Sexual Violence and Violence Against Women

#### *Campus Director*

- Keeps copies of sign in sheets and documents of presentation in Director's office.

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

During an emergency evacuation, each instructor is responsible for the safe and orderly evacuation of his/her class. Instructors not in class should assist with any evacuation problems that may arise. It is the instructor's responsibility to prevent panic, control traffic, and provide calm leadership. The following guidelines should be observed:

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

Responsibilities of the following parties: This policy is the primary duty of all employees on staff.

#### **Fire**

- All parties are notified of a Fire Emergency by the building fire alarm/ and or verbal drill
- All Instructors are to immediately obtain Walkie Talkies/ and/ or announce verbally and begin vacating from the building
- All instructors and students are to immediately exit to the nearest and safest exit door.
- Once all persons are exited, everyone should move to the parking lot away from the building.
- Instructors should immediately take role to ensure all students are accounted for using DSDT attendance books/ roster print-outs.
- Once emergency staff gives clearance, all parties will be allowed to exit or enter the building.

**Weather**

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

**Timely Warning & ER Notifications Policy**

Timely warnings are issued at the discretion of DSDT and the nature of the incident. Notification of these warning may be communicated via email, institutional texting system, letter, or phone.

A school must, in a manner that is timely and will aid in the prevention of similar crimes, report to the campus community on crimes that are included in campus crime statistics, such as arson, robbery, burglary, motor vehicle theft, aggravated assault, criminal homicides, and sex offenses if it represent a treat to students and employees.

If there is an immediate threat to the health or safety of students or employees occurring on campus, DSDT must follow its emergency notification procedures. If DSDT follows its emergency notification procedures, DSDT not required to issue a timely warning based on the same circumstances; however, the school must provide adequate follow-up information to the community as needed.

**Timely Warning & ER Notifications Procedure**

Responsibilities of the following parties:

*School Director*

- Will issue a timely warning in the event of emergency situations via text and voice messages through DSDT email and/or phone.
- Will issue test text and voice notifications via twice a year. This will be conducted once in the Spring and once in the Summer.
  - Student will be notified of the test 1 week prior to the test.
  - If the test is unsuccessful,

*Students*

- If the test is unsuccessful, the students will notify the Director to update or trouble shoot reason for failed test.

*Financial Aid Director*

- Will update the student's record
- Notify the School Director of the update via private message.

*Respective School Director*

- Submit an additional timely notification test to students who updated their information.

## **DSDT DRUG AND ALCOHOL POLICY**

DSDT provides a drug-free environment for its faculty, staff and students. The unlawful possession, use, distribution, dispensation, sale, or manufacture of drugs or alcohol is prohibited on DSDT campuses premises, and at any DSDT school activities. No employee or student is to report or return to work or any company activity while under the influence of drugs or alcohol. For purposes of this policy, a conviction includes a plea of guilty or of nolo contendere.

### **TESTING POLICY & PROCEDURES**

Drug and Alcohol testing may be conducted on a random basis; if DSDT believes that an employee or student has been observed possessing or using a prohibited substance on the job; when DSDT reasonably believes that any employee or student may be affected by the use of drugs or alcohol and that they use may adversely affect performance or the environment, or when DSDT reasonably believes that an employee or student is impaired during working or school hours or while engaged in school business, or a school sponsored activity; and any employee or student who has had a positive drug or alcohol impairment test may be subjected to periodic, random testing, for a period of one year from a positive Drug or Alcohol impairment test.

#### **The following testing methods and procedures will be followed:**

- Testing will ordinarily be conducted during, immediately before or immediately after regularly scheduled work or school hours. For current employees, time spent in testing and in traveling to and from the regular work site to the place of testing, is work time.
- Whenever a Drug or Alcohol impairment test is done at the request of DSDT pursuant to this policy, the school will pay the actual costs of the testing. In addition, when testing is done at locations over than the school facility, the school will pay reasonable transportation costs for the travel to and from the site to the testing location.

#### **Testing shall be conducted under the following conditions:**

- Sample collection shall be performed under reasonable and sanitary conditions;
- Sample collections shall be labeled in such a way as to reasonably preclude the possibility of misidentification of test results;
- Prior to testing, the individual shall be provided with an opportunity to notify DSDT of any information relevant to the test;
- Sample collection, storage, and transportation, where necessary shall be performed in a manner reasonably designed to preclude the possibility of sample contamination adulteration, or misidentification.
- Sample testing will be done in such a way as to comply with scientifically accepted analytical methods and procedure, and by a laboratory approved or certified by, at least, one of the following: United states Department of Health and Human Services, College of American Pathologist or a state department of health and human services.
- Upon the written request of the individual, a positive Drug test result shall be confirmed by a subsequent test, using a different chemical process than used in the initial drug screen. A chromatographic technique or another comparably reliable analytic method will be conducted confirming results.

#### **Employee and Student Testing Rights**

- Employees and students have the right, upon written request, to obtain a copy of the written test results.
- DSDT will not release information relating to testing, including test results, to any third parties except upon written authorization of the employee or student, or when legally compelled to do so.

### **Refusal of Testing**

Refusal to participate in Drug or Alcohol impairment testing when requested to do so, or refusal to accept the terms and conditions of testing as specified in this policy, may result in disciplinary action, up to and including termination from DSDT. If applicable, prospective employees or students who refuse to undergo Drug or Alcohol impairment testing are not eligible for hire or admission (respectively).

*Please direct any questions, concerns, or reports regarding this policy to the School Director.*

### **DSDT's Policy on Consumption of Alcoholic Beverages on Campus**

The use or possession of alcoholic beverages is expressly prohibited in classrooms, lecture halls, laboratories, the libraries, and within buildings or arenas where events, lectures, and meetings are held. The use of alcoholic beverages is expressly prohibited in all public areas of campus buildings. For employees only, social activities held off-premises and paid for on a personal basis are generally not affected by this policy. If management considers it appropriate and approves of such use in writing, alcoholic beverages may be served at company-sponsored events held off-premises and for purely social reasons.

### **Consumption and Possession of Marijuana**

All students, employees, and visitors are on notice that the Michigan Medical Marijuana Act (MMMA) and the Michigan Regulation and Taxation of Marijuana Act (MRTMA) conflicts with federal criminal laws governing controlled substances, as well as federal laws requiring institutions receiving federal funds, by grant or contract, to maintain drug-free campuses and workplaces. DSDT participates in federal grant programs which would be in jeopardy if those federal laws did not take precedence over state law. Thus, the use, possession, or cultivation of marijuana in any form and for any purpose on DSDT's property or premises violates the DSDT Drug and Alcohol Policy. DSDT will not allow the use, possession, or cultivation of marijuana or marijuana paraphernalia on its property or DSDT-controlled premises, even if a student, employee, or visitor has been properly certified as a medical marijuana user. Students, employees, and visitors will be asked to remove or dispose of their marijuana from DSDT's property and premises immediately. Furthermore, the MMMA and MRTMA states that employers are not required to accommodate employees who use medical marijuana; therefore employers have the right to refuse employment to anyone who fails a drug test. Additionally, the State of Michigan prohibits a person from undertaking any task under the influence of marijuana, when doing so would constitute negligence or professional malpractice, as in many areas of the medical field. As a result, drug testing may be required at any time by a prospective employer consistent with the laws of the State of Michigan and the requirements of potential employers.

### **FEDERAL PENALTIES FOR SCHEDULE I, II, III, IV, AND V DRUGS**

Production of these drugs is controlled. Examples include GHB, heroin, methaqualone, all hallucinogens (except PCP, marijuana and hashish), and THC, which can also be a Schedule II drug, depending on its form. Schedule II drugs have a high potential for abuse, but have some medical uses. Production of these drugs is controlled. Examples include opium, morphine, codeine, other narcotics, barbiturates, cocaine, amphetamines, PCP, and OxyContin. Federal criminal penalties for selling Schedule I and II drugs vary with the quantity of the drug and whether the individual has the drug for personal use or for sale. Criminal penalties are more severe if sale or use of the drug results in death, if drug use is tied to sexual assault, or for repeat offenses. Federal penalties for Schedule I, II, III, IV and V (except marijuana) are set forth in the attached Schedule A.

Federal penalties for marijuana, hashish, hashish oil, and Schedule I substances are set forth in the attached Schedule B. Schedule III, IV and V drugs include those most citizens would categorize as "prescription drugs." Schedule III drugs have some potential for abuse but less than those on Schedules I and II. The potential for abuse of Schedule IV drugs is less than those on Schedule III, and the potential for abuse of Schedule V drugs is less than those on Schedule IV. All Schedule III to V drugs have medical uses and their production is not controlled. Examples of these drugs include some narcotics, barbiturates, depressants, amphetamines, and other stimulants. Penalties for sale of these drugs depend on whether it is a first offense or repeated offense (see Schedule A).



**SCHEDULE**

**A**

**Federal Trafficking Penalties for Schedules I, II, III, IV, and V (except Marijuana)**

Schedule	Substance/Quantity	Penalty	Substance/Quantity	Penalty
II	Cocaine 500-4999 grams mixture	<b>First Offense:</b> Not less than 5 yrs. and not more than 40 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine of not more than \$5 million if an individual, \$25 million if not an individual.  <b>Second Offense:</b> Not less than 10 yrs. and not more than life. If death or serious bodily injury, life imprisonment. Fine of not more than \$8 million if an individual, \$50 million if not an individual.	Cocaine 5 kilograms or more mixture	<b>First Offense:</b> Not less than 10 yrs. and not more than life. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine of not more than \$10 million if an individual, \$50 million if not an individual.  <b>Second Offense:</b> Not less than 20 yrs. and not more than life. If death or serious bodily injury, life imprisonment. Fine of not more than \$20 million if an individual, \$75 million if not an individual.  <b>2 or More Prior Offenses:</b> Life imprisonment. Fine of not more than \$20 million if an individual, \$75 million if not an individual.
II	Cocaine Base 28-279 grams mixture		Cocaine Base 280 grams or more mixture	
IV	Fentanyl 40-399 grams mixture		Fentanyl 400 grams or more mixture	
I	Fentanyl Analogue 10-99 grams mixture		Fentanyl Analogue 100 grams or more mixture	
I	Heroin 100-999 grams mixture		Heroin 1 kilogram or more mixture	
I	LSD 1-9 grams mixture		LSD 10 grams or more mixture	
II	Methamphetamine 5-49 grams pure or 50-499 grams mixture		Methamphetamine 50 grams or more pure or 500 grams or more mixture	
II	PCP 10-99 grams pure or 100-999 grams mixture		PCP 100 grams or more pure or 1 kilogram or more mixture	
<b>Substance/Quantity</b>		<b>Penalty</b>		
Any Amount Of Other Schedule I & II Substances		<b>First Offense:</b> Not more that 20 yrs. If death or serious bodily injury, not less than 20 yrs. or more than Life. Fine \$1 million if an individual, \$5 million if not an individual.		
Any Drug Product Containing Gamma Hydroxybutyric Acid		<b>Second Offense:</b> Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if not an individual.		
Flunitrazepam (Schedule IV) 1 Gram				
Any Amount Of Other Schedule III Drugs		<b>First Offense:</b> Not more than 10 yrs. If death or serious bodily injury, not more that 15 yrs. Fine not more than \$500,000 if an individual, \$2.5 million if not an individual.  <b>Second Offense:</b> Not more than 20 yrs. If death or serious injury, not more than 30 yrs. Fine not more than \$1 million if an individual, \$5 million if not an individual.		
Any Amount Of All Other Schedule IV Drugs (other than one gram or more of Flunitrazepam)		<b>First Offense:</b> Not more than 5 yrs. Fine not more than \$250,000 if an individual, \$1 million if not an individual.  <b>Second Offense:</b> Not more than 10 yrs. Fine not more than \$500,000 if an individual, \$2 million if other than an individual.		
Any Amount Of All Schedule V Drugs		<b>First Offense:</b> Not more than 1 yr. Fine not more than \$100,000 if an individual, \$250,000 if not an individual.  <b>Second Offense:</b> Not more than 4 yrs. Fine not more than \$200,000 if an individual, \$500,000 if not an individual.		

## SCHEDULE

### B

Federal Trafficking Penalties for Marijuana, Hashish and Hashish Oil, Schedule I Substances	
Marijuana 1,000 kilograms or more marijuana mixture or 1,000 or more marijuana plants	<b>First Offense:</b> Not less than 10 yrs. or more than life. If death or serious bodily injury, not less than 20 yrs., or more than life. Fine not more than \$10 million if an individual, \$50 million if other than an individual.  <b>Second Offense:</b> Not less than 20 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$20 million if an individual, \$75 million if other than an individual.
Marijuana 100 to 999 kilograms marijuana mixture or 100 to 999 marijuana plants	<b>First Offense:</b> Not less than 5 yrs. or more than 40 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine not more than \$5 million if an individual, \$25 million if other than an individual.  <b>Second Offense:</b> Not less than 10 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$8 million if an individual, \$50million if other than an individual.
Marijuana 50 to 99 kilograms marijuana mixture, 50 to 99 marijuana plants	<b>First Offense:</b> Not more than 20 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine \$1 million if an individual, \$5 million if other than an individual.  <b>Second Offense:</b> Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if other than an individual.
Hashish More than 10 kilograms	
Hashish Oil More than 1 kilogram	
Marijuana less than 50 kilograms marijuana (but does not include 50 or more marijuana plants regardless of weight)  1 to 49 marijuana plants	<b>First Offense:</b> Not more than 5 yrs. Fine not more than \$250,000, \$1 million if other than an individual.  <b>Second Offense:</b> Not more than 10 yrs. Fine \$500,000 if an individual, \$2 million if other than individual.
Hashish 10 kilograms or less	
Hashish Oil 1 kilogram or less	

### Title IV Federal Funds Employment and Enrollment Eligibility

Having a history of substance abuse does not automatically preclude you from employment. In accordance with applicable law, applicants who have a history of substance abuse and who have demonstrated an ability to abstain from the substance, or who can provide medical assurance of acceptable control, may be considered for employment as long as they are otherwise qualified for the position for which they are applying.

If the information is not necessary for legal or security purposes, DSDT will keep employee and applicant medical & personal information confidential, in accordance with the law.

Due to DSDT's participation in Title IV Federal Funds Programs, DSDT has established a Drug-Free Workplace/Drug & Alcohol Policy and Abuse Prevention Program. All employees and students must read, understand and sign a statement regarding this policy and, as a condition of employment/enrollment, agree to willingly participate in the program and abide by the terms of the policy. DSDT has established this program to inform employees and students about:

The dangers of drug abuse in the workplace;

- a. DSDT's policy of maintaining a drug-free environment;
- b. Any available drug counseling, rehabilitation, and employee assistance programs

- c. The penalties that may be imposed upon employees or students for drug abuse violations.

In accordance with this policy and program, DSDT has imposed the following requirements:

- a. Employees shall notify their supervisor or other appropriate management personnel, and students shall notify the Education Director or School Director of any criminal drug statute conviction for a violation occurring in the workplace no later than five (5) days after such conviction;
- b. DSDT shall notify any federal contracting agency within (10) ten days of having received notice that an employee or student, engaged in the performance of such contract or grant, has had a criminal drug statute conviction for a violation in the workplace; and
- c. DSDT will take appropriate action against any employee or student who is convicted for a violation occurring in the workplace, or will require the employee's/student's satisfactory participation in a drug abuse assistance or rehabilitation program.

### **Disciplinary Action Upon Conviction**

Any violation of this Drug-Free policy, along with any unsatisfactory conduct as related to this policy, may result in discipline including (but not limited to) termination, in DSDT's sole discretion. Violation of this policy will result in the following timely action being taken by DSDT including (but not limited to):

- a. Requiring the employee/student to satisfactorily participate in a drug or alcohol abuse assistance or rehabilitation program approved for such purposes by a federal, state, or local health agency, law enforcement, or other appropriate agency, including mandatory counseling, evaluation, treatment, and rehabilitation for a drug-use or alcohol-use disorder;
- b. Appropriate personnel action, including but not limited to, termination of employment/enrollment; or
- c. Referral for prosecution consistent with local, state, and federal law.

Disciplinary action by DSDT does not preclude the possibility of criminal charges against an employee. The filing of criminal charges similarly does not preclude action by DSDT.

Any student or employee who is convicted of a criminal drug offense occurring at the workplace or is convicted of the unlawful possession, use, distribution, dispensation, sale, or manufacture of drugs or alcohol on campus premises or at any DSDT school activity shall be subject to discipline consistent with applicable DSDT policies and contracts. He/She may be required to participate in an appropriate drug or alcohol treatment program as a condition of further employment or enrollment.

The Advisory Committee Board Members encourage the administration to explore additional ways to ensure that members of the DSDT community are aware of the dangers inherent in the abuse of drugs and alcohol, and to assist those who suffer from alcohol or drug abuse in obtaining access to necessary rehabilitation and treatment. All faculty, staff, and students must abide by the terms of this policy as a condition of employment/enrollment at DSDT.

All employees and students must comply with federal, state, and local law regarding the possession and consumption of alcohol and controlled substances. Legal sanctions for failure to comply with local, state, and federal laws may include suspension, revocation, or denial of a driver's license; disqualification from employment; property seizure; community service; imprisonment; and/or monetary fines.

### **Help, Information, & Resources**

Drugs and alcohol can be highly addictive and injurious to the body. Consumption of drugs or alcohol cause a number of marked changes in behavior and serious health threats, including (but not limited to): loss of sense of responsibility, memory or coordination, restlessness, irritability, anxiety, paranoia depression, inattentiveness, loss of appetite, loss of mental functions, sexual indifference, coma, convulsions, hallucinations, tremors, chemical dependence, lung, liver or nervous system damage, and death. Impairment of

employees while on the job or students while in school is likely to result in injury to others or third parties and affects the morale & productivity of everyone.

Abuse of alcohol and drugs presents significant health risks and medical consequences, including (but not limited to the following):

- Addiction to alcohol or other drugs; if untreated, can be fatal.
- Alcohol abuse can result in liver damage & disease, gastrointestinal problems, and brain damage.
- Abuse of alcohol and marijuana during puberty can cause imbalance of sex hormones, resulting in reduced muscle mass & shrinkage of testicles in males and menstrual difficulties & infertility in females.
- Marijuana is psychologically addicting and can contribute to short-term memory problems.
- Long-term use of stimulants (“uppers,” including speed, crack, methyl, crystal, etc.) may cause permanent damage to the brain, heart, lungs and other organs.
- The use of cocaine and amphetamines can result in heart attacks; people who lack an enzyme called Pseudocholinesterase in their bodies can die from a single minute dose of cocaine.
- Inhalants (poppers, rush, laughing gas, sniffing of glue or paint thinner, etc.) may cause mental confusion, mood swings, delusions, or hallucinations.
- The use of hallucinogens — especially PCP (angel dust) — can result in an irreversible drug-induced psychotic state and/or delusions of omnipotence, which can trigger life-threatening behavior.
- Depressants (“downers,” including ludes, reds, 714s, barbs) greatly increase the risk of automobile accidents because they affect vision, judgment, coordination, and other physical skills.
- Intravenous (IV) drug users (users of heroin and other opiates) risk infection by diseases such as hepatitis & Acquired Immune Deficiency Syndrome (AIDS) from sharing needles.

DSDT encourages employees and students who may have substance abuse problems to seek professional advice and treatment. DSDT has adopted and implemented prevention programs within our institution to train all staff/faculty on our Drug and Alcohol abuse policy. In the event one of our staff/faculty should witness or report abuse on campus, DSDT will provide the resources necessary in order to prevent unlawful possession, use, or distribution of illicit drugs and alcohol by all students and employees on school premises or as part of any of its activities.

DSDT campus employees may obtain confidential assistance through the DSDT Employee Assistance Program Professionals on DSDT campus by calling a student counselor at 313-263-4200 and setting up a counseling confidential meeting, provided by DSDT’s Student Services Department. Students may seek confidential assistance by contacting Counseling and Psychological Services at 313-263-4200 ask for Student Services Department. The Student Services Department will assist you with direct contact in the event the need is greater than our Student Services Department is able to handle.

Employees/students are required to report any violations of this policy by their peers to their Supervisor/School Director. If you need additional resources and local contact information, such as crisis intervention, treatment and recovery support, counseling, or prevention information, please see the drug and alcohol awareness bulletin board located at the school.

For a complete list of the federal and state penalties due to a conviction of the distribution or possession of drugs, please see the drug and alcohol awareness bulletin board located at the school.

### **Drug & Alcohol Abuse Prevention Program Procedure**

Responsibilities of the following parties:

#### *Representative*

- Place order to any promotional items at least a month in advance.
- Place order or obtain literature to validate information in the PowerPoint.
- **Make available to students, the DSDT Drug and Alcohol policy in the policy and procedures handbook located in the Student Resource Center.**

- Ensure that each students and employee signs the sign in sheet.

*Instructor*

- Present the PowerPoint during a school wide event and or provide a guest speaker to present to the students.
- Ensure that lesson plans include 1 hour of presentation time for the school wide presentation.

*Main Campus School Director*

- Ensure that event take places every year before July 1
- Ensure that above documents are issued to all students and employees
- Ensure that DSDT Presentation survey is issued to all students and employees
- Evaluate the survey results
- Obtain the sign in sheet and components of the survey and presentation for documentation purposes.

**Biennial Review Policy**

DSDT makes available upon request to the Department of Education and to the public, the information distributed to students and employees and the results of the biennial review of DSDT's Drug and Alcohol Program that:

- Determines the effectiveness of the program and implements needed changes.
- Determines the number of drug and alcohol related violations and facilities that occur on the school's campus or as part of the school's activities and are presented to DSDT's administrative staff.
- Determines the number of and type of sanctions that are imposed.
- Ensures that sanctions are consistently enforced.

**Biennial Review Procedure**

Responsibilities of the following parties:

*Main Campus School Director and Financial Aid Director:*

- On the odd years, during the 2<sup>nd</sup> Quarter by July 1<sup>st</sup> a review of the Drug and Alcohol handbook will take place updating all needed changes; the first review is schedule in 2019 and then every 2 years thereafter.
- The updated review will be posted on school's website, school student break area, and at the financial aid office
- Each school must make available, upon request, to the U.S. Department of Education and to the public, the information distributed to students and employees and the results of a biennial review of the school's program that:
  1. Determines the effectiveness of the program and implements needed changes
  2. Determines the number of drug and alcohol-related violations and fatalities that occur on the school's campus or as part of the school's activities, and are presorted to campus officials
  3. Determines the number and type of sanctions that are imposed
  4. Ensures that sanctions are consistently enforced
- DSDT will also provide a copy of the report to anyone form the public a copy upon request.
- An updated copy will be made available upon a request to the Main Campus School Director or Financial Aid Director.

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

Students who fall within the crossover period must complete the new award year FASFA for the new award year. **DSDT** measures progress in Clock Hours and uses the Payment Period for the period of calculation.

#### **CALCULATION FORMULA:**

The formula determines the amount of Title IV Aid that was disbursed plus Title IV that could have been disbursed.

Calculate the percentage of Title IV 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.

$$\frac{\text{HOURS SCHEDULED TO COMPLETE}}{\text{TOTAL HOURS IN PERIOD}} = \% \text{ EARNED}$$

- B. If this percentage is greater than 60 %, the student earns 100%.
- C. If this percent is less than or equal to 60%, proceed with calculation.
  - Percentage earned from (times) total aid disbursed or could have been disbursed = **Amount Student Earned.**
  - Subtract the Title IV aid earned from the total disbursed = Amount to be Returned.
  - 100% minus percent earned = **Unearned Percent**
  - Unearned percent (multiplied by) total institutional charges from the period = **Amount Due from the School.**

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

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

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

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

Responsibilities of the following parties:

#### *Financial Aid Representative*

- Completed the new award year FASFA
- Bring in updated supporting documentation
- If required complete verification forms
- Meet with students about new award year information

### **Entrance Counseling Policy**

Entrance Counseling is required before you can receive your first Direct Subsidized Loan, or Direct Unsubsidized Loan as an undergraduate, or your first Direct PLUS Loan as a graduate/professional student.

If you're a student and have not previously received a subsidized/unsubsidized loan or PLUS loan (graduate/professional students only) under the Direct Loan Program, you must complete entrance counseling for that loan type before receiving a loan to ensure that you understand your responsibilities and the obligations you're assuming.

Documentation of approval and any prior approvals of Title IV, HEA funds will be available for review from the National Student Loan Data System (NSLDS). This includes previously received Title IV or a transcript, or other documentation from a previous institution that demonstrates Title IV enrollment.

A counseling session will take 20-30 minutes to complete. You must complete the counseling in a single session. You cannot save a partially completed counseling session.

### **Entrance Counseling Procedure**

Responsibilities of the following parties:

#### *Financial Aid Representative*

- Contact student via mail or phone to complete Entrance Counseling
- A counseling session will take 20-30 minutes to complete. You must complete the counseling in a single session.
- Inform Student Entrance Counseling is required before you can receive your first Direct Subsidized Loan, or Direct Unsubsidized Loan as an undergraduate, or your first Direct PLUS Loan as a graduate/professional student.
- Print a copy of the Entrance Exam for the FA file.

### **Exit Counseling for Students who Withdrawal (unofficially or officially) Policy**

Regulations require that schools provide exit counseling. DSDT requires all students who have received a student loan to complete the in-person exit counseling workshops or online exit counseling at [studentloans.gov](http://studentloans.gov). DSDT has also provided the following PowerPoint for additional resources.

### **Exit Counseling for Students who Withdrawal (unofficially or officially) Procedure**

Responsibilities of the following parties:

#### *Financial Aid Representative*

- Contact student via mail or phone to complete Exit Counseling.
- A counseling session will take 20-30 minutes to complete. You must complete the counseling in a single session.
- Inform Student Entrance Counseling is required before you can receive your first Direct Subsidized Loan, or Direct Unsubsidized Loan as an undergraduate, or your first Direct PLUS Loan as a graduate/professional student.
- Print a copy of the Exit Exam for the FA file.

### **Loan Deferments Policy**

Under certain circumstances, you can receive a *deferment* or *forbearance* that allows you to temporarily postpone or reduce your *federal student loan* payments. Postponing or reducing your payments may help you avoid *default*.

You'll need to work with your *loan servicer* to apply for deferment or forbearance; and be sure to keep making payments on your loan until the deferment or forbearance is in place.

A deferment is a period during which repayment of the *principal* and interest of your loan is temporarily delayed.

During a deferment, you do not need to make payments. What's more, depending on the type of loan you have, the federal government may pay the interest on your loan during a period of deferment.

The government may pay the interest on your

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

The government does not pay the interest on your unsubsidized loans (or on any PLUS loans). You are responsible for paying the interest that accrues (accumulates) during the deferment period, but your payment is not due during the deferment period. If you don't pay the interest on your loan during deferment, it may be capitalized (added to your principal balance), and the amount you pay in the future will be higher.

### **Loan Deferments Procedure**

Responsibilities of the following parties:

#### *Financial Aid Representative*

- In School Deferment Request
  - If the student had a Direct Loan at a previous school they attended, they can request a deferment while attending your school. If the student had a loan from a bank or other lender the student must get the deferment form from their lender. The student fills out their part and DSDT will complete its part and send it in.
- Out of school Deferment Request
  - Most deferments are not automatic, and you will likely need to submit a request to your loan servicer, the organization that handles your loan account. If you are enrolled in school at least half-time and you would like to request an in-school deferment, you'll need to contact the DSDT Financial Aid Department as well as your loan servicer.
  - Your deferment request should be submitted to the organization to which you make your loan payments.
    - Direct Loans Program loans: contact your loan servicer

### **Organizational Structure- Business Office & Financial Aid Office Policy**

DSDT has 2 main departments, Business, Admission/Financial Aid.

- The Business department includes Institutional Eligibility. It maintains recertification, and all administration capabilities. It manages and consumer information, Fiscal Management, and reporting and reconciling monthly financial reports, return to FSA funds.
- The Admission/Financial Aid department handles enrollment and student eligibility.
- The Director of Student Services provides educational tools and resources to students for completion of program, success and transition.
- Director of Financial Aid makes sure the financial Aid program follows regulations, determines Title IV student eligibility and handles the Default Management Prevention.

### **Organizational Structure- Business Office and Financial Aid Office Procedure**

**Policy:** See above policy

**Purpose:** To become familiar with the organization structure of business and financial aid offices.

Responsibilities of the following parties:

#### *Financial Aid Representative*

- Work with the Business Representative and Boston Educational Network to process the Federal Financial Aid PELL grants and loans.

#### *Business Office Representative*

- Work with Financial Aid Representative, Boston Educational Network, and School Director with the disbursement of Financial Aid funds.
- Fiscal Management, Reporting and reconciling monthly financial reports and returns of FSA funds.

#### *Director of Financial Aid*

- Makes sure the Financial Aid Programs are following the federal regulations set forth by the State Department of Education

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

DSDT calculates the COA (cost of attendance) based on the individual student Federal Student Aid non-need-based on award eligibility, the student's program, and dependency status. The remaining FSA need based award eligibility is calculated based on the student's COA minus Economic Family Contribution (EFC). COA



is documented individually in the enrolled student's files upon receipt of a valid Institution Student Report (ISIR) from the United States Department of Education. Cost of Attendance is provided to prospective or enrolled students upon request.

**Direct Costs:**

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

**Indirect Costs:**

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

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

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

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

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

Responsibilities of the following parties:

*Financial Aid Representative*

- Contact the student once she or he receives the ISIR.
- Discuss info with the student.
- Have student sign the award letter to accept, deny, or decrease.
- Give a copy to the student.
- Allow students to complete enrollment forms with Admissions Representative.
- Review and revise the award letter and COA from Boston Educational Network.

*Third Party Servicer- Boston Education Network*

- Develop an award letter based on the information provided
- Populate the students Cost of Attendance based on the information on the ISIR and program of interest and academic year

**General Eligibility Criteria for FSA Program Funds Policy**

It is the policy of DSDT to ensure that each student is eligible to receive Federal Student Aid (FSA) programs. The Financial Aid department is provided to help student determine their eligibility for FSA.

**General Eligibility Criteria for FSA Program Funds Procedure**

Responsibilities of the following parties:

*Admissions Representative*

- Verify High School Diploma
- Sign all enrollment forms

*Financial Aid Representative*

- Interviews the student and assist if needed on the application process for Financial Student Aid
- Check to ensure that student is not in Default
- Have a valid ISIR
- If selected for Verification, submit all documents to clear the verification request
- Complete the entrance counseling
- Check the NSLDS web site for borrowing limits and other documents needed from previous schools (transcripts)

**Eligibility Criteria for State Aid Assistance Policy**

DSDT maintains a state approval with the Michigan Dept. of Licensing & Regulation (LARA) to operate as a post-secondary school. This approval is renewed yearly by July 18th.

**Eligibility Criteria for State Aid Assistance Procedure**

Responsibilities of the following parties:

*School Director*

- To submit the necessary documents to LARA yearly by November 2<sup>nd</sup>.
- Keep copies of all documents and approvals in the Director's Office.

**Programs Offered:**

Business Information Technology Specialist Diploma- 600 Clock Hours  
 Digital Marketing Professional Diploma - 600 Clock Hours  
 Technology Professional 6 Certification of Completion- 240 Clock Hours  
 Technology Professional 2 Certification of Completion- 80 Clock Hours  
 Full Stack Developer Certification of Completion- 320 Clock Hours  
 Medical Assistant Diploma- 760 Clock Hours  
 AI Prompt Specialist Certification of Completion- 80 Clock Hours  
 Machine Learning Specialist Diploma- 600 Clock Hours

**Programs Offered for Title IV Aid:**

Digital Marketing Professional Diploma Program- 600 Clock Hours  
 Business Information Technology Specialist- 600 Clock Hours  
 Machine Learning Specialist Diploma- 600 Clock Hours  
 Medical Assistant Diploma- 760 Clock Hours

**Processing Aid Applications Policy**

DSDT encourages students to utilize Federal Student Aid to assist them with funding for programs eligible for Title IV, HEA Aid. DSDT has an Admission/Financial Aid Representative on staff to assist any students who choose to complete the application on site, or they can choose to complete the process at home and use the counselors at DSDT for questions. After completed DSDT will obtain their FASFA and work with their ISIR to determine their eligibility.

**Processing Aid Applications Procedure**

Responsibilities of the following parties:

*Financial Aid Representative*

- Student applies for Financial Aid or visits the campus for info and applies
- Financial Aid interview
- Discuss FA options
- Student Acceptance
- Complete the FAFSA

- Interviews the student and assist if needed on the application process for FSA
- Check to ensure that student is not in Default
- Verify High School Diploma
- Verify Dependent or independent status
- Complete verifications on student if applicable
- Check Default rate
- Verify all info on ISIR is correct
- Package student- Award letter
- Have students accept, deny, or reduce possible loan amounts
- Check the NSLDS web site for borrowing limits and other documents needed from previous schools (transcripts)
- Complete the entrance counseling
- Contact business office of new students and refunds to be received

### **Calculation of Payment Period/Awarding of Aid Policy**

DSDT has set up payment periods with the assistance of the Financial Aid Representative, and the Business Representative. DSDT is a clock hour school and payment period are defined not only in clock hours but also in weeks of instructional time.

### **Calculation of Payment Period/Awarding of Aid Procedure**

Responsibilities of the following parties:

*Business Representative and Financial Aid Representative*

notify the students of the information below:

- If the program is one academic year or less, the academic year or program is divided into four payment periods.
- The first payment period is the period in which the student successfully completes 1/4 the clock hours AND 1/4 the weeks of instructional time in the program.
- The second payment period is 2/4 the clock hours and 2/4 the weeks of instructional time in the program.
- The third payment period is 3/4 the clock hours and 3/4 the weeks of the instructional time in the program.
- The fourth payment period is 4/4 the clock hours and 4/4 the weeks of the instruction time in the program.
- Pell Grant
- Maximum Award - \$7395
- Minimum Award - \$0
- Aggregate Limit – None

### **Direct Loans**

- Interest Rates:
- Congress has passed, and the President has signed the Bipartisan Student Loan Certainty Act of 2013 which ties federal student loan interest rates to financial markets. Under this Act, interest rates will be determined each spring for new loans being made for the upcoming award year, which runs from July 1st to the following June 30th. Each loan will have a fixed interest rate for the life of the loan.

#### FEDERAL DIRECT UNSUBSIDIZED

- Starting July 1, 2023-5.28%
- Starting July 1, 2022-4.99%
- Starting July 1, 2021-3.73%
- Starting July 1, 2020-2.75%
- Starting July 1, 2019-4.53%
- Starting July 1, 2018-5.05%

### FEDERAL DIRECT SUBSIDIZED

- Starting July 1, 2023-5.50%
- Starting July 1, 2022-4.99%
- Starting July 1, 2021-3.73%
- Starting July 1, 2020-2.75%
- Starting July 1, 2019-4.53%
- Starting July 1, 2018-5.05%

- \*Any graduate loan periods that begin 7/1/12 or later are NO LONGER ELIGIBLE for Subsidized loans.

#### ***Academic Year Limits:***

- To be eligible for Full Subsidized Loan amounts, students must have a “Need”, according to their Need Analysis.
- Credit checks for a Direct PLUS Loan applicant are valid for 180 days.
- Independent Undergraduate Students:
  - -1st Year Max Subsidized - \$3,500 /Unsubsidized - \$6,000 Max - \$9,500
  - -2nd year Max Subsidized -\$4,500/Unsubsidized - \$6,000 Max-\$10,500
  - -3/4-year Max subsidized -\$5,500/Unsubsidized - \$7,000 Max-\$12,500

#### ***Dependent Undergraduate Students:***

- -1st Year Max Subsidized-\$3,500/Unsubsidized - \$2,000 Max - \$5,500
- -2nd Year Max Subsidized-\$4,500/Unsubsidized -\$2,000 Max - \$6,500
- -3rd/4th Year Max Sub \$5,500/Unsubsidized -\$2,000 Max - \$7,500
- Parent PLUS Loans\* annual maximum depends on Cost of Attendance (COA) less other financial aid.
- \*If Parent PLUS Loan is denied, a Dependent Student may borrow at the Independent Levels.

#### ***Independent Undergraduate Students (and Dependents whose parents cannot borrow PLUS):***

- \$57,500 – with a maximum of \$23,000 Subsidized
- Dependent Undergraduate Students:
  - \$31,000 – with a maximum of \$23,000 Subsidized
  - Graduate Students (Independent):
  - \$138,500 – with a maximum of \$65,500 Subsidized.
- 

#### **Identifying Payment Periods for Each Program Policy**

To ensure that students meet their clock hour, weeks of instruction, attendance and grade point average (GPA) requirements in order to be eligible for the next Title IV, HEA funding disbursement. Each student will be evaluated at the end of each payment period to determine eligibility.

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

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

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

The Digital Marketing Professional Diploma Program is 600 clock hours and 30 weeks of instruction, will be disbursed at:

Diploma Program	Payment Period (clock hours)
Digital Marketing Professional	Academic Year 1- 300 &600 (actual hours attended)

The Business Information Technology Specialist Diploma Program is 600 clock hours and 30 weeks of instruction, will be disbursed at:

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

The Medical Assistant Diploma Program is 760 clock hours and 35 weeks of instruction, will be disbursed at:

Diploma Program	Payment Period (clock hours)
Medical Assistant	Academic Year 1- 380 & 760 (actual hours attended)

The Machine Learning Specialist Diploma Program is 600 clock hours and 30 weeks of instruction, will be disbursed at:

Diploma Program	Payment Period (clock hours)
Machine Learning Specialist	Academic Year 1- 300 &600 (actual hours attended)

\* Students must meet their clock hour, weeks of instruction, attendance and grade point average (GPA) requirements in order to be eligible for the next Title IV, HEA funding disbursement.

### Identifying Payment Periods for Each Program Procedure

Responsibilities of the following parties:

#### *Instructors/ Director of Student Services*

- Monitors clock hours, attendance, and Grade Point Average monthly.
- Notifies Director of students who are not progressing satisfactorily based on the attendance or academic progress

#### *Director of Financial Aid*

- Conferences students of lack of hours, attendance or poor GPA
- Alert the business office when a student has meet the minimum qualitative and quantitative SAP requirement.

#### *Business Office Representative*

- Alert Financial Aid of the students have met the payment period for their program

### Disbursements Policy for Pell and Direct Loans Policy

DSDT uses a third-party servicer, Boston Educational Network, to assist with ensuring that disbursements for Pell Grants and Loans are applied to students' accounts in a timely fashion. Disbursements are applied to student's ledger cards and are notified via text messages and or via email through the business office.

### Disbursements Policy for Pell and Direct Loans Procedure

Responsibilities of the following parties:

#### *Student*

- Completes the FASFA

#### *Financial Aid Representative*

- Receive the ISIR from the TPS site Boston Educational Network
- Checks the ISIR for correctness, comments and verification
- Enters corrections into the BEN website and waits for new ISIR
- Resolves all comments
- Completes verifications
- Packages student on the BEN website

#### *Business Office Representative*

- Once ISIR is cleared for payment, DSDT enters the disbursement information in the Boston Educational Network (BEN) website and sends the student a disbursement notification via email.

#### *Educational Consultant Management*

- BOSTON EDUCATIONAL NETWORK (BEN) submits disbursement information to COD for all students.
- BOSTON EDUCATIONAL NETWORK (BEN) requests fund and places the funds transfers on the BEN site; an email is automatically sent to the Financial Aid Office at the school; and receipts/award notifications for students who received their first disbursements are automatically put on the BEN site.
- On the date of the Funds Transfer, the funds are deposited by USDE into the school's federal bank account.
- The school moves funds from their federal bank account to school's operating account. The school credits each student's ledger card with the Pell, SEOG or Loan payment using the date of the funds transfer with the funds transfer number in the reference column of the ledger.
- Students are notified via text or email of the disbursements
- BOSTON EDUCATIONAL NETWORK (BEN) is notified through the business office.

#### **Disbursement for Parent Plus Policy**

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

#### **Disbursement for Parent Plus Procedure**

Responsibilities of the following parties:

##### *Financial Aid Representative*

- Alerts the Business Representative of the disbursement for the student
- Place a copy of all student ledgers in the student's files

##### *Financial Aid Director*

- Ensures the student is good academic standing (attendance and academic progress)
- Prints and updated ledger card for student's FA and Ed files

##### *Business Representative*

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

### **NSLDS Responsibilities Policy**

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

### **NSLDS Responsibilities Procedure**

Responsibilities of the following parties:

#### *Financial Aid Representative*

- The Financial Aid Representative downloads an up-to-date enrollment status list from our secure student EMS.
- The Financial Aid Representative manually updates each student in the NSLDS enrollment reporting section.
- Reports enrolled students to the NSLDS database along with anticipated competition dates
- If a student withdraws or goes on a LOA, their enrollment status is updated in NSLDS within one week to 30 days
- DSDT updates enrollment status' (i.e. LOA, withdraw or graduation) every 30 days at the first of each month
- Reports students has a change in enrollment status, graduated or withdrawn within 30 days
- Reviews the NSLDS database to ensure students have not received Title IV monies for the current semester.
- Verify the roster file within 15 days and return to NSLDS.

#### *Financial Aid Director*

- If a student withdraws or goes on a LOA, the financial aid director verifies their enrollment status is updated in NSLDS within one week to 30 days
- The Financial Aid Director verifies enrollment statuses in NSLDS one week after the financial aid rep completes updates

### **DSDT Fiscal Responsibilities Policy**

Managing Financial Student Aid assistance is a school-wide responsibility. Financial Student Aid program funds are provided to DSDT and all offices at DSDT must work together to ensure successful program management. DSDT's Financial Student Aid program management generally takes place in four functional areas:

The Financial Aid Office  
The Business Office  
Student Services  
School Directors Office

### **DSDT Fiscal Responsibilities Procedures**

Responsibilities of the following parties:

#### *School Director/Owner*

- Ultimate responsibility for DSDT's Financial Student Aid (FSA) programs resides with the school's School Director. Although authority and responsibility are to other offices at DSDT, the leadership and support of the School Director are crucial to successfully administering Financial Student Aid programs. By recognizing the importance of federal aid programs, making Financial Student Aid

program administration a high priority, and holding key officials accountable, the School Director leadership can foster an environment that promotes an effective and responsive financial aid program that meets institutional goals, students' needs, and federal requirements.

- accurate, current, and complete disclosure of the financial condition of each federal aid program or project sponsored by Education Department;
- effective control over and accountability for all funds, property, and other assets, including adequate safeguarding of all such assets to ensure that they are used solely for authorized purposes
- comparison of actual expended amounts with amounts budgeted for each Financial Student Aid program;
- procedures according to the applicable terms of the FSA program for determining reasonableness, allowability, and allocability of costs
- examinations in the form of external or internal audits, which must be made according to generally accepted auditing standards and government auditing standards

#### *Financial Aid Representative*

- While a school's financial aid office is usually assigned most of the responsibility for administering FSA programs, its role in the institution's fiscal operation is a limited one.
  - ensuring proper filing of timely applications

#### *Business Office Representative*

- This office may also be known as the fiscal office, finance office, comptroller's office, bursar's office, treasurer's office, or student accounts office. The business office provides critical services to DSDT in managing both federal and non-federal financial aid programs. Administering the accounting, recordkeeping, and reporting functions related to DSDT use of federal and other funds requires many detailed, complex systems that
  - records that adequately identify the source and application of funds for sponsored activities and contain information on institutional awards, authorizations, obligations, unobligated balances, assets, income, liabilities, revenues, expenditures, and cash disbursements.
  - procedures to ensure the timely, efficient transfer of funds when they are advanced through electronic methods (these procedures must limit the time between the transfer of funds from the U.S. Treasury and cash disbursement by the school to students so that funds are disbursed no later than three business days following the receipt of funds, and do not result in excess cash.
  - accounting records that are supported by audit trail documentation

#### **FISAP Responsibilities Policy**

DSDT does not currently file a FISAP.

#### **FISAP Responsibilities Procedure**

Responsibilities of the following parties:

*Main Campus School Director/Owner*

- Review if DSDT is eligible and would like to proceed with the FISAP by October 1<sup>st</sup> each year and complete the application.

#### **Updating ECAR Policy**

DSDT updates the ECAR in the event of a change of ownership, adding new programs, recertification, closure of a location, changing to clock hours to credit hours, and or adding additional locations.



### **Updating a program**

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

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

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

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

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

### **Limitations for school's subject to "2-year rule"**

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

In addition, a school subject to the 2-year rule may not award FSA funds to a student in a program that is not included in the school's approval documents.

### **Updating ECAR Procedure**

Responsibilities of the following parties:

*School Director/Owner*

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

### **State Authorization Procedures Policy**

Generally, an eligible institution must be in a state. A school is physically located in a state if it has a campus or instructional site in that state. DSDT renews their authorization and their approval status with the Michigan Department of Licensing and Regulation (LARA) annually at the end of the year.

### **State Authorization Procedures Procedure**

Responsibilities of the following parties:

*School Director/Owner*

- Completes the renewal application annually by June 30th.

### **Financial Aid and Business Office Forms Policy**

Financial Aid and business office forms are reviewed for updates as needed. These updates are driven by the DSDT third-party servicer and federal mandated updates. Hard copies of these forms are stored in the DSDT Financial Aid Office in a binder, electronic file folder, and USB. Past copies are archived in the Financial Aid Administrative office as hard copies in a binder and/or fire safety secured file.

### **Financial Aid and Business Office Forms Procedure**

Responsibilities of the following parties:

*School Director/ Financial Aid Representative/ Business Office Representative*

- Responsible for reviewing updates and modifying forms as needed.

#### *Financial Aid Office*

- Responsible for keeping hard copies of former forms as well as current copies of updated forms in a binder in the Financial Aid Administrative office.

#### *Business Office*

- Uploading forms on the computer's FA folder and DSDT binder with hard copies.

### **Financial Aid Trainings Policy**

It is the policy of DSDT to ensure that all Financial Aid Representative and affiliated personnel are trained in Financial Aid. Therefore, those persons are required to attend the necessary trainings to become trained to service students who are receiving funding. Each person must complete the 20-hour online training (Fundamentals), attend the online webinar with Financial Aid Services and create an account with the FSA Partners- Knowledge Center to obtain valuable information about GCL, Financial Aid (FA) webinars, FA handbooks and other updates.

### **Financial Aid Trainings Procedure**

Responsibilities of the following parties:

#### *Financial Aid Representative / Business Representative*

- Complete 20 online trainings within 1 month of the date of hire
- Obtain access to the Knowledge Center within 2 weeks of date of hire
- Register for Boston Education Network's online training within 6 months of date of hire
- Intercept the DCL, review for updates and disclose information to supervisor

#### *School Director*

- Monitors, supervises, and plan travel arrangements the training to ensure that training is completed in the time permitted.

### **Annual Calendar of Related Activities Policy**

It is policy for all Financial Aid Representative and related personnel to be up to date with Financial Aid (FA) activities and trainings. Therefore, all employees in the department of FA and the business office must have a log in to FSA Partners- Knowledge Center to have access to the Financial Student Aid calendar and related activities.

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

Responsibilities of the following parties:

#### *Financial Aid Representative / Business Representative*

- Create a log in to FSA Partners- Knowledge Center
- Visit the site regularly for updated activities and its content

### **Scheduled Breaks Policy**

All student scheduled breaks follow major holidays for the geographical location of DSDT. Breaks are in the catalog and posted on the student portal.

DSDT operates on a 12-month academic calendar, with the classes in session January through the end of December. New Classes start every four weeks. (can be adjusted when applicable)

### **SCHOOL HOLIDAYS**

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.

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

### **Bereavement Leave**

DSDT will allow for time off in the event of the **death** of a member of your immediate family, **students** are permitted three (3) consecutive days (Monday thru Saturday) off from classes. Upon return the **student** must work with each faculty member to make up any missed class work or assignments.

### **Scheduled Breaks Procedure**

Responsibilities of the following parties:

*Main Campus School Director or designee*

- Will update the campus catalog, bulletin board, and student portal of scheduled breaks.

*Instructors*

- Will remind students of scheduled breaks and ensure to reflect breaks on pacing charts and lesson plans.

### **Communication of Officials for FSA Funding Purposes Policy**

DSDT Financial Aid Representatives must communicate with related departments and the third-party server Boston Educational Network (Financial Aid Services) about ensuring that all documents for funding requirements, eligibility and requirements maintained.

### **Communication of Officials for FSA Funding Purposes Procedure**

Responsibilities of the following parties:

*Admissions & Financial Aid Representative / Business Representative*

- Meet weekly in staff meeting to share important information regarding student funding.
- Meet daily to discuss individual students regarding specific requirements, verifications, etc.
- Communicate via student portal in the Admission tab to keep each department updated in the finding process of each student.
- Documents all appointments for Financial Aid, Enrollment, or business office Representative in administrative calendar for all departments to view.
- Communicates with the third-party server and the business office for funding requirement, eligibility and requirements maintained.

### **Recertification Procedure Policy**

Recertification is the process through which a school that is presently certified to participate in the Financial Student Aid programs applies to have its participation extended beyond the expiration date of its current Program Participation Agreement (PPA). The Department will notify a school six month prior to the expiration of the school's PPA. The school must submit a materially complete application before the expiration date listed in its PPA.

### **Recertification Procedure**

Responsibilities of the following parties:

*School Director*

- Complete the APP no later than 90 days prior its current eligible PPA expires and submit.
- Once approved submit two signed PPA documents to the Department of Education.
- Once signed by the Department of Education, one signed copy will be returned to the school.
- Once received a signed copy will be placed into the school files.
- Ensure that Part 2 Certification is signed and returned by the Third-Party Servicer Boston Educational Network.

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

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

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

Responsibilities of the following parties:

#### *Main Campus School Director*

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

### **Protecting Student Information Policy**

DSDT views PII (Personally Indemnifiable Information) as a high priority. Students are required to sign media permission form, and all employees are required to understand the important of PII. DSDT monitors the controls and protects student's information and ensure that system users are trained properly.

### **Protecting Student Information Procedure**

Responsibilities of the following parties:

#### *Respective School Director*

- Limit access to only modules needed in the student portal.
- Audit review use of information of students by accessing and monitoring log in reports.
- Identify and authenticate of users by issuing passwords throughout portal system to gain access modules.
- Limit individuals to access certain modules by only allowing access to modules needed.
- Monitor and control interoffice communications by only using student portals for communication.

#### *Admission/Financial Aid Representative*

- Have all students sign a media release form accepting or denying photographs and posting photographs.

### **Unaccompanied Homeless Youth Determinations Policy**

If a student does not have and cannot get documentation from any of the authorities given on page 28, you (the Financial Aid Representative) must determine if she is an unaccompanied youth who is homeless or is self-supporting and at risk of being homeless. It is important to make homeless youth determinations on a case-by-case basis.

### **Unaccompanied Homeless Youth Determinations Procedure**

Responsibilities of the following parties:

#### *Financial Aid Representative*

- Ask for help with determining eligibility from local school district homeless liaisons, state homeless education coordinators, or the National Center for Homeless Education (<http://center.serve.org/nche>).
- Use discretion when gathering information and respect the student's privacy. Some information, such as that protected by doctor-patient privilege, is confidential.
- Determine eligibility based on the legal definitions provided.
- Unaccompanied homeless youth may use the address of your school as their own on the FAFSA.
- Use third party servicer, Boston Educational Network, to assist in this process to determine the professional judgment.

### **Third-Party Servicer Requirements Policy**

DSDT uses a third-party servicer, BOSTON EDUCATION NETWORK to assist in the Financial Student Aid process. They are considered a consultant in administering the FSA programs.

### **Third-Party Servicer Requirements Procedure**

Responsibilities of the following parties:

- The follow departments work with BOSTON EDUCATION NETWORK in maintaining compliance in the areas / duties below.
  - Financial Aid Representative/Business Office Representative/ Director
    - Processing student financial aid applications, performing need analysis, and determining student eligibility or related activities;
    - Certifying loans, servicing loans, or collecting loans;
    - Processing output documents for payment to students, and receiving, disbursing, or delivering FSA funds;
    - Conducting required student consumer information services;
    - Preparing and certifying requests for cash monitoring or reimbursement funding
    - Preparing and submitting notices and applications required of eligible and participating schools, or preparing the Fiscal Operations Report and Application to Participate (FISAP); and
    - Processing enrollment verification for deferment forms or NSLDS enrollment reporting

### **Third-Party Servicer- PPA Policy**

DSDT uses a third-party servicer, Boston Educational Network to assist in the Financial Student Aid process. DSDT and Department of Education requires a signed Part 2 Certification by Boston Education Network and DSDT's School Director.

### **Third-Party Servicer- PPA Procedure**

Responsibilities of the following parties:

*School Director*

- Sign the Program Participation Agreement (PPA) .
- Forward the PPA to Boston Educational Network for signature.
- Forward the signed PPA to Department of Education with both signatures 90 days prior to the expiration date of the current PPA.

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

DSDT uses Boston Education Network's portal, a tool to collect and disburse Title IV disbursements for students. Disbursements are made at the student's payment period.

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

**Policy:** See above policy

**Purpose:** To process Financial Student Aid

Responsibilities of the following parties:

*Instructor/ Director of Student Services*

- Alerts Financial Aid that student has reached their payment period based on attendance and Grade Point Average.
- Sign in sheet is printed along with progress report and is submitted to Financial Aid Representative

*Financial Aid Representative*

- Places current sign in sheets and progress reports in student's FA file

*Business Office Representative*

- Request disbursement from Boston Education Network After receiving notification of funds available

- Transfer funds to operating account
- Notate the disbursement on the student ledger card
- Print the ledger card submit Ed. File and FA file
- Notify student in writing of disbursement

### **eZ Audit POLICY**

DSDT utilizes eZ- Audit for financial compliance. EZ-Audit is a web based paperless single point of submission for financial statements and compliance audits. BKD, our third-party auditor hired by the school simply signs on to eZ-Audit, enters summary audit and financial data directly from your report into a web form, attaches an electronic version of the report, and hits the submit button. The institutions' submission through eZ-Audit will allow for more rapid and efficient processing by the Department of Education (ED) and therefore provide us with immediate feedback. If DSDT expends less than 300,000 in federal funds ending after December 31, 2003, DSDT is not required to submit a compliance audit.

### **eZ Audit PROCEDURES**

Responsibilities of the following parties:

#### *School Director*

- Contacts BKD auditors and submits its compliance audit data and summary financial data via an internet web form.
- Submits a registration request on the school's letterhead to input the institutions data.
- The school/auditor attaches an electronic copy of the school's financial statement and compliance audit in a non-editable pdf format (using Adobe Acrobat).
- The eZ-Audit system automatically forward flagged financials and deficient audits to FSA's Case Management Team for resolution.
- Case Teams communicate with the school director to reach resolution.
- As desired, you can periodically check eZ-Audit for status of your report.
- Audit year is Jan.-Dec.
- Audit must be received by the Department of Education by June 30th of each year.
- DE must accept and if rejected on/or after June 30th, it will be considered late.

### **Crediting Student Accounts Policy**

DSDT credits student's accounts as cash payments are made and as disbursements are requested. Accounts are updated on the day of payment or the day the disbursement was made, and students can view their balances using the student's portal as well as obtain a receipt.

### **Crediting Student Accounts Procedure**

Responsibilities of the following parties:

#### *Business Office Representative*

- Credits student's account to ledger card
- Prints receipts for students who make cash payments
- Notifies students of disbursements made to the ledger card
- Prints an updated ledger card for all disbursements for Financial Aid and Department of Education files.

### **Drawing Down Federal Funds Policy**

DSDT and Boston Education Network use the G5 payment system to request payments, adjust drawdowns and refund/return funds. G5 also provides continuous access to current grant and payment information, such as authorized amounts, cumulative net drawdowns, refunds, returns, current award balances and payment histories. A school's available balance is the amount of cash available for a school to draw down through G5. The available balance is the difference between the authorized amount and the school's net drawdowns to date. A separate Authorization is maintained for each program by award year.

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

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

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

### **Drawing Down Federal Funds Procedures**

Responsibilities of the following parties:

#### *Business Office Representative*

- Request funds to drawdown from Boston Education Network
- Wait for the drawdown from Boston Education Network
- Boston Education Network to be deposited into bank accounts
- Meet with student to share findings of drawdown
- Disburse funding to student

### **Disbursement Of Federal Funds Policy**

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

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

These rules apply to the following programs: Pell Grant, FSEOG, Perkins Loan, Direct Loan. We have indicated when a rule applies to FWS.

Rules for crediting FSA funds to the student's account and making direct disbursements to the student or to the parent (PLUS), with provisions for early disbursements, delayed disbursements, and late disbursements:

#### 1) Notifications & Authorizations

- notification of disbursement
- required student/parent authorizations
- notification/authorization by electronic means

- 2) Method of disbursement
  - credit to student’s account (school may hold credit balance if authorized)
  - disbursement directly to student or parent
- 3) Disbursement rules/ timing of multiple disbursements
  - FWS students must be paid at least once a month
  - funds may be disbursed up to 10 days before classes begin (in most cases)
  - disbursements to 1st-time, 1st-year, Stafford borrowers must be delayed 30 days
  - requirement to successfully complete coursework in clock-hour and nonterm credit-hour and certain nonstandard term credit-hour programs
  - school may make unequal FSEOG/Perkins disbursements to meet uneven costs
  - under certain conditions, late disbursements must be made to students
- 4) Prompt disbursement rules
  - usually 3-day timeframe for school to disburse to student/parent after receiving funds
    - exception: school may delay returning Stafford/PLUS funds to lender in some cases
  - The school may not use an in-person or telephonic conversation as the sole means of notification because these are not adequate and verifiable methods of providing notice.
    - However, a school may use in person and telephone notices in addition to those provided in writing.

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

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

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

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

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

A cancellation or modification is not retroactive—it takes effect on the date that the school receives it from the student or parent. If a student or parent cancels an authorization to use FSA program funds. If you are notifying the student of the next disbursement by electronic mail or other electronic means, you are encouraged to follow up on any electronic notice for which you receive an “undeliverable” message.



Anytime a school returns a loan disbursement or any portion of a loan disbursement to a lender, the origination fee and insurance premium are reduced in proportion to the amount returned. If a student returns the full amount of a loan within 120 days of disbursement, the loan is cancelled, and the origination fee and insurance premium are eliminated.

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

## **DISBURSEMENT OF FEDERAL FUNDS PROCEDURES**

Responsibilities of the following parties:

### *Business Office Representative*

- Notify the student and/or parent in writing in advance the amount and date the funds will be received
- Notify student or parent of the amount of funds awarded
- Inform student or parent they have the right to cancel all or part of funding received
- Must get authorization to disburse funds from student or parent
- Set up a conference to receive funds

### **Fiscal Recordkeeping Process Policy**

DSDT must keep comprehensive, accurate program and fiscal records related to its use of Federal Student Aid (FSA) program funds. The importance of maintaining complete, accurate records cannot be overemphasized. Program and fiscal records must demonstrate DSDT can meet the administrative and fiscal requirements for participating in the FSA programs. DSDT has a CPA that keeps documentation on all fiscal records; as well as, the third-party auditor, BKD Partners, LLC that keep all secure electronic fiscal data. In addition, records must demonstrate proper administration of FSA program funds and must show a clear audit trail for FSA program expenditures. For example, records for each FSA recipient must clearly show that the student was eligible for the funds received and that the funds were disbursed in accordance with program regulations. In addition to the general institutional record keeping requirements discussed here, DSDT must also comply with all program-specific record keeping requirements contained in the individual FSA regulations.

DSDT maintains all required records in a systematically organized manner. Unless a specific format is required, DSDT may keep required records in:

- hard copy
- microform
- computer file
- optical disk
- CD-ROM
- other media formats

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

DSDT must comply with the following laws of record retention:

Minimum Record Retention Periods of FSA approximately 3 years.

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

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

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

End of the award year for which the aid was awarded

End of the award year in which the report was submitted

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

any other document when a signature seal, etc., contained on it is necessary for the document to be used for the purposes for which it is being retained.

DSDT may maintain a record in an imaged media format only if the format can reproduce an accurate, legible, and complete copy of the original document. When printed, the copy must be approximately the same size as the original document.

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

### **Fiscal Recordkeeping Process Procedure**

Responsibilities of the following parties:

#### *Financial Aid Representatives & Director of Student Services*

- Satisfactory Academic Progress (SAP) documentation
- Admission enrollment documentation
- Enrollment status
- Certification statements
- Verifying application data resolving conflicting information
- Professional Judgment decisions
- Financial Aid history information for transfer students

#### *Main Campus School Director*

- State agency reports
- Self-evaluation reports
- Program participation agreement, approval letter, and Eligibility and Certification Approval Report (ECAR)

#### *Director of Financial Aid*

- Audits and program review reports

#### *Business Office*

- Pell grant statements
- Can request quarterly statements monthly reports from G5
- Reconciliation reports
- State grand and scholarship award rosters and reports

### **Fiscal Reporting Process Policy**

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

### **Fiscal Reporting Process Procedure**

Responsibilities of the following parties:

#### *School Director*

- Contact the CPA on September 1st to request documents needed to complete the audit
- Submit documents no later than 30 days
- Submit final audited Financials to Department of Education (DOE) no later than December 31<sup>st</sup>
- Make corrections that may be needed by DOE
- Make final submission by December 31<sup>th</sup>
- Prepare monthly records
- Communicate with auditing companies to keep books in compliance.

### **Monthly and Annual Reconciliation Policy**

DSDT reconciles monthly and annually all cash and funds disbursed each month to the business office records, ledger cards and banks statements.

### **Monthly and Annual Reconciliation Procedure**

Responsibilities of the following parties:

#### *Business Office Representative*

- Determines the amounts disbursed and cash collected each month according to the business office records, ledger, bank statements
- The Business Office Representative compares the monthly reconciliation report the BEN completes with COD and logs any discrepancies in an excel sheet.
- In the case of a discrepancy, the BOR works with our third-party servicers, BEN, to reconcile any reports.

#### *Third Party Service (Boston Educational Network)*

- Prepares monthly reconciliation reports
- Works with DSDT Business Office Representative to resolve discrepancies

### **Procedures for Handling Overpayments Policy**

Any amount of unearned grant funds that you must return is called overpayment. Occasionally and R2T4 results in an overpayment that a student is required to return to a grant or loan program. Grant over payments of \$50 or less do not have to be returned.

A student who owes an overpayment remains eligible for Title IV, HEA program funds during and beyond 45 days from the date the school sends a notification to the student of overpayment, or 45 days from the date the school was required to notify the student of the overpayment if, during those 45 days the student:

- Repays the overpayment in full to the school.
- Enters into a repayment agreement with the school in accordance with repayment arrangements satisfactory to the school; or
- Signs a repayment agreement with the Department, which will include terms that permit a student to repay the overpayment while maintaining his/ her eligibility for Title IV, HEA program funds.

Within 30 days of the date of the school's determination that the student withdrew, an institution must send a notice to any student who owes a Title IV, HEA grant overpayment as a result of the student's withdrawal from the school in order to recover the overpayment.

If the student does not repay the overpayment in full to the school or enter a repayment agreement with the school or the Department within the earlier of 45 days from the date the school sends notification to the student of overpayment, or 45 days from the date the school was required to notify the student of the overpayment.

At any time, the student fails to meet the terms of the repayment agreement with the school:

- The student chooses to enter into a repayment agreement with the Department.
- The student who owes an overpayment is ineligible for Title IV HEA program funds.

You must make arrangement with the school or Department of Education to return the amount of unearned grant funds.

### **Procedures for Handling Overpayments Procedure**

Responsibilities of the following parties:

#### *Business Office Representative*

- Apply the student's ledge card with the disbursement amount

- Alert the Financial Aid Representative of the overpayment due to the student confirming the amount
- Notify the student of the disbursement and the overpayment within 14 days of the disbursement
- Issue the overpayment to the student, apply it to the ledger card.
- Make a copy of the ledger card for the Financial Aid File and Education Department file

*Financial Aid Representative*

- Place copy of student ledger in the Financial Aid file

**Excess Cash Policy**

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

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

- A period of peak enrollment at a school occurs when at least 25% of the school’s students start classes during a given 30-day period.
- A school determines this percentage for an award year with the following fraction:  

$$\frac{\text{Number of students who started classes in the comparable 30-day period in the prior award year}}{\text{Total number of students who started classes during the entire prior award year}}$$
- For any period, other than a period of peak enrollment, the school can maintain the excess cash balance if the excess cash balance is less than 1% of the school’s prior-year drawdowns. In this case also, the school is required to eliminate the excess cash balance within the next seven days by disbursing SFA Program funds to students for at least the amount of that balance.
- If a school that is participating in the Direct Loan Program does not have prior-year drawdown data for the Direct Loan Program because it did not participate in the Direct Loan Program for that prior award year, the school may include the total amount of loans guaranteed under the Direct Loan Program for students attending the school during that year in determining total prior-year drawdowns.
- The Department reviews schools to determine where excess cash balances have been improperly maintained and to seek recovery from those schools of the resulting losses to the government.

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

Generally, a check is “issued” when the school releases, distributes, or makes available the check by mailing the check to the student or parent (if applicable), or by notifying the student or parent expeditiously that the check is available for immediate pickup. However, upon a finding that a school has maintained excess cash

balances, the Department considers the school to have issued a check on the date that check cleared the school's bank account, unless the school demonstrates to the satisfaction of the Department that it issued the check to the student shortly after the school wrote that check.

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

### **Excess Cash Procedures**

Responsibilities of the following parties:

#### *Business Office Representative*

- Disburse FSA funds to students
- Monitors Excess Cash in accounts
- Return excess cash to the State Department of Education immediately after third day of school receiving funds.
- May keep fund beyond the third day if there is an extenuating circumstance. (7 days)

### **Credit Balance Authorization/Retention Procedures Policy**

A Credit Balance Authorization is issued to the student if a student or parent would like to place hold on a credit balance. In order place a hold on such funds, the student or parent must complete the Authorization to Hold a Federal Student Aid Credit Balance form.

A Title IV credit balances occurs whenever the amount of Title IV funds credited to a student's account for a payment period exceeds the amount assessed the student for allowable charges associated with that payment period.

If FSA disbursements to the student's account at the school create an FSA credit balance, you must pay the credit balance directly to the student or parent as soon as possible but no later than 14 days after:

- the first day of class of a payment period if the credit balance occurred on or before the first day of class of that payment period;
- the balance occurred if the credit balance occurred after the first day of class of a payment period.

The law requires that any excess PLUS Loan funds be returned to the parent. Therefore, if PLUS Loan funds create a credit balance, the credit balance would have to be given to the parent. However, the parent may authorize your school (in writing or through StudentLoans.gov) to transfer the proceeds of a PLUS Loan credit balance directly to the student for whom the loan is made (for example, to a bank account in the student's name).

The Department does not specify how a school must determine which FSA funds create an FSA credit balance. A school may not require a student to take any actions to obtain his or her credit balance. It is the sole responsibility of the school to pay, or make available, any FSA credit balance within the 14-day regulatory time frames.

Notwithstanding any authorization obtained by the school, the school must provide the student with any remaining FSA credit balance resulting from FSA loan funds by the end of the loan period and any other FSA program credit balances by the end of the last payment period in the award year for which the funds were awarded.

### **Credit Balance Authorization/Retention Procedures Procedure**

Responsibilities of the following parties:

#### *Business Office Representative*

- Determine if the student will have a credit balance

- Offer the student or parent (in the event of a parent plus) the option to complete the Credit Balance form
- If chosen not to complete the form, overpayments must be issued to the parent or student- information submitted to the Business Office.

### **GAPS and COD Policy**

DSDT requires that each student receives a person search called Common Origination and Disbursement (COD). This information consists of student and borrower demographics along with details about the awards they hold. It determines what percentage of the scheduled award for the current year has been used. DSDT requires the use of a core financial system (GAP) which integrates the following processes: financial management, contracts and purchasing, grants administration and payment management. DSDT's third party servicer, Boston Educational Network, provides full financial management support services including obligation of award authorizations, disbursement of funds, and final grant closeout.

### **GAPS and COD Procedures**

**Purpose:** To view students' previous demographics along with details about the awards they hold.

Responsibilities of the following parties:

#### *Admission/Financial Aid Representative*

- After the interview and application is complete the Financial Aid Representative will do a COD search on each student.
- The COD search will give the FAR demographics along with the details about the awards they hold.

#### *Business Office Representative*

- Provide and Review Boston Educational Network's Disbursement of Funds
- Provide and Review Boston Educational Network's Final Grant Closeout

### **Prior Year Charges Policy**

Prior-Year Charges in general, FSA Program funds can be used to pay only for educational expenses a student incurs in the period for which those funds are provided. However, a school is permitted to use a student's FSA Program funds to pay minor prior-year institutional charges if the student has, or will have, an FSA credit balance, and the school obtains the student's or parent's authorization to pay the prior year charges.

A school may obtain authorization from a student in advance to use FSA Program funds to cover prior-year charges that are less than \$200. To pay prior-year charges for amounts equal to or greater than \$200, in addition to obtaining an authorization, a school must determine that payment would not prevent the student from paying for his or her current educational expenses.

- If a student's title IV aid package includes only a Direct Loan, the current year is the current loan period.
- If a student's title IV aid package includes only non-Direct Loan aid, the current year is the award year.
- If a student's title IV aid package includes both a Direct Loan and other aid, DSDT may choose to use either the loan period or the award year as the current year.

### **Prior Year Charges Procedures**

Responsibilities of the following parties:

#### *Business Office Representative*

- Obtain authorization from a student or parent in advance to use FSA Program Funds to cover prior-year charges that are less than \$200.

- Pay minor prior-year institutional charges if an FSA credit balance occurs only to pay for student's costs for the period for which the funds are provided.
- Current-year funds for prior award year charges for tuition and fees (and with permission, educationally related charges) for a total of no more than \$200. May not pay prior year charges in excess of \$200.

### **Separation of Duties Policy**

To manage DSDT financial aid programs effectively, the aid Representative must be supported by an adequate number of professional and clerical personnel. The number of staff that is adequate depends on the number of students aided, the number and types of programs in which the DSDT participates, the number of applicants evaluated and processed, the amount of funds administered, and the type of financial aid delivery system the school uses.

The Department will determine on a case-by-case basis whether a school has an adequate number of qualified persons, based on program reviews, audits, and information provided on the school's application for approval to participate in the FSA programs. Each department is responsible for specific duties to assist in facilitating the duties of each office. Currently DSDT staff is as follow:

- Director of Financial Aid
- CFO (Business Office)
- School Director
- Director of Student Services (SAP)
- Director of Administration
- Instructors
- Admission Representatives

### **Separation of Duties Procedure**

**Purpose:** To make sure each staff member is adequate to number of students and programs.

Responsibilities of the following parties:

#### *School Director*

- Will evaluate the staff, number of students to determine when and if an increase of staff is needed.
- If an increase in staff is needed, the School Director will have a Strategic Planning Meeting with Upper Management and the CPA to budget for upcoming hiring of individuals and the departments that are needed

### **Administrative Cost Allowances Policy**

DSDT chart of accounts must identify all general ledger and subsidiary ledger accounts relevant to the Federal Student Aid Programs. In addition, DSDT accounts, journals, and records must follow federal cash from the moment the funds are drawn through G5 to when funds are disbursed to students, including when cash is deposited into institutional bank accounts, transferred between bank accounts, posted to general and subsidiary ledger, posted to the individual student account ledgers, and if applicable, disbursed directly to students.

### **Administrative Cost Allowances Procedure**

**Purpose:** To make sure all accounts follow federal aid requirements.

Responsibilities of the following parties:

#### *Business Office Representative & School Director*

- Enable timely internal and external financial reporting
- Meet documentation requirements;
- Ensure proper filing of applications
- Create accurate report
- CPA
- Make sure records are reconciled monthly and yearly audit is following the Department of Education and The Council on Occupational Education.

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

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

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

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

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

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

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

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

Responsibilities of the following parties:

### *Business Office Representative*

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

## **Federal Bank Account Requirements Policy**

For each account that contains Federal Student Aid program funds, DSDT who is located in the state of Michigan- must identify that FSA funds are maintained in the account by including the phrase **Federal Funds** in the name of the account and the specific type of funds (PELL/DL); or notifying the depository institution that the depository account contains Title IV program funds that are held in trust and keeping a copy of this notice in its records and, except for public institutions, filing a Uniform Commercial Code Form (UCC-1) statement with the appropriate state or municipal government entity that discloses that an account contains federal funds. DSDT must keep a copy of the UCC-1 statement in its records.

The Department may require DSDT to maintain Title IV funds in a separate depository account that contains no other funds if the Department determines that the school failed to comply with: (1) the cash management regulations, (2) The recordkeeping and reporting requirements, or (3) applicable program regulations.

## **Federal Bank Account Requirements Procedure**

Responsibilities of the following parties:

### *Business Office Representative & The School Director*

- Ensure that all bank accounts that receive federal funds are identified as Federal Funds on the account or the account with Title IV.
- Keep copies of its data.

## **Default Management Plan Policy**

If DSDT has a single CDR equal to or greater than 30% must establish a Default Prevention Task Force and develop a Default Management Plan to reduce defaults and prevent loss of institutional eligibility that:



- Identifies the factors causing the schools CDR to exceed the threshold.
- Establishes measurable objectives and identifies steps to improve the CDR.
- Specifies actions the school will take to improve student loan repayment including loan repayment counseling.

### **Default Management Plan Procedure**

Responsibilities of the following parties:

#### *Admission Representative*

- Keeps records updated regarding borrowers' addresses, telephone numbers, employers, and employers' addresses.
- If necessary, uses activities such as skip tracing and sending letters "Forwarding and Address Correction Requested" to maintain contact with borrowers who have moved.

#### *Instructors*

- Reteaching/Tutoring if on academic probation.
- How to assist students with health problems.
- How to assist students with language problems.
- Is transportation a problem?
- Does the student have financial difficulties and are they financially literate?
- 
- 

#### *Director of Workforce Development*

- Helping non-completers find a job.
- Assists borrowers who are having trouble in finding employment through career counseling, job placement assistance, and information about repayment options, including the availability of deferments and forbearances.
- Does the student have financial difficulties and are they financially literate?

#### *Main Campus School Director*

- Identifies and allocates the personnel, administrative, and financial resources appropriate to implement the default management plan.
- Ensures that its admission policies and screening practices only admit students who have a reasonable expectation of succeeding in their program of study.
- Evaluates and improves, if necessary, its curriculum, facilities, materials, equipment, qualifications and size of faculty, and other aspects of its educational program to ensure that borrowers remain in school and that they are employed after they complete their program of study.

#### *Financial Aid Representative*

- Establishes a process to ensure the accuracy of data used to calculate its draft and official cohort default rates.
- Establishes a data collection system to track and analyze borrowers who default on their loans.
- Defines evaluation methods, sets default reduction targets, and conducts an annual comprehensive self-evaluation of its administration of the Title IV programs to identify institutional practices that should be modified to reduce defaults, and then implements those modifications.
- Enhances the enrollment retention and academic persistence of borrowers through counseling and academic assistance, especially for academically high-risk students.
- Understand who is defaulting and why. Create a picture of who is at-risk and what works.
- If possible, identifies and implements alternative financial aid award policies and develops alternative financial resources to reduce the need for student borrowing.

- In addition to requirements in 34 CFR 682.604 and 34 CFR 685.304, provides the information listed in the "Enhanced Initial and Exit Counseling" section, on the following page, during initial and exit counseling.
- If possible, uses interactive electronic materials, audio-visual materials, and written tests during counseling to ensure that borrowers understand the terms and conditions of their loans.
- If borrowers demonstrate that they do not understand the terms and conditions of their loans (for example, by failing a written test), provides additional, more intensive counseling.
- Frequently reviews borrowers' in-school status to ensure that it recognizes instances in which borrowers withdraw without notice
- Contacts borrowers during their grace period to remind them of the importance of the repayment obligation and of the consequences of default.
- Tracks borrowers' delinquency status by obtaining reports from the Department and from Direct Loan Program guaranty agencies and lenders.
- Exit Counseling
- Information about delinquency and default
- Requesting borrower information.

*All Staff*

- Student success/completion is a key to less default.

**Fiscal and Cash Management Policy**

DSDT's financial management system (including DSDT's accounting system) provides effective control over and accountability for all funds received from the U.S. Department of Education's (ED's) Grant Administration and Payment System (G5).

**MAINTAINING AND ACCOUNTING FOR FUNDS**

All schools must maintain a bank account into which the Department transfers, or the school deposits, SFA program funds. The account must be federally insured or secured by collateral of value reasonably equivalent to the amount of SFA program funds in the account. A school is not required to maintain a separate account for SFA program funds unless the Department specifies otherwise.

A school is not required to maintain a separate bank account for Direct Loan program funds that the school receives from a lender by EFT. A school must maintain and account for Direct Loan program funds in the same manner required for other SFA program funds.

**Maintaining and Accounting for Funds Cite 34 CFR 668.163**

Bank account notification requirements for each account that contains FSA program funds, a school must identify that FSA program funds are maintained in the account by:

- including the phrase federal funds in the name of the account, or
- notifying the bank or investment company of the accounts that contain FSA program funds and keeping a copy of this notice in its records and, except for public institutions, filing an UCC-1 statement with the appropriate state or municipal government entity that discloses that an account contains federal funds.

The school must keep a copy of the UCC-1 statement in its records.

The requirement that a school file a UCC-1 statement when an account's name does not include the phrase federal funds was established to reduce the possibility that a school could misrepresent federal funds as its own funds to obtain a loan or secure credit.

### **Interest-bearing or investment account**

A school is required to maintain Title IV funds in an interest-bearing depository account, except if (1) the school receives less than \$120,000 in Federal funds per year, (2) the best reasonably available interest-bearing account would not be expected to earn interest in excess of \$500 per year on Federal cash balances, (3) the depository would require an average or minimum balance so high that it would not be feasible within the expected Federal and non-Federal cash resources, or (4) a foreign government or banking system prohibits or precludes interest bearing accounts (as provided in 2 C.F.R. § 200.305(b)(8)). The school may retain earnings up to \$500 per award year, excluding Perkins earnings. All earnings in excess of \$500 must be returned annually to the Department of Health and Human Services, but not later than 30 days after the end of that award year.

A school is not required to maintain Direct Loan, Pell Grant, FSEOG, and FWS program funds in an interest-bearing account or an investment account for an award year if:

- the school drew down less than \$3 million from these funds in the prior award year and anticipates that it will not draw down more than \$3 million in the current award year;
- the school can demonstrate that it would not earn over \$500 in interest on the funds it will draw down during the award year; or
- the school requests these funds under the just-in-time payment method.

Schools that request funds under the just-in-time payment method are exempt because this method would ensure the expeditious accounting for and disbursement of program funds. Therefore, little or no interest would be earned on funds provided to the school.

### **Fiscal and Cash Management Procedure**

Responsibilities of the following parties:

#### *Director of Administrator*

- Maintains student payments in the accounting system

#### *Business Office Representative*

- Ensures that all disbursements are valid and eligible
- Ensure proper filing of applications.
- Ensure timely internal and external Financial Aid reporting.
- Keep accurate and auditable records including providing the clear audit trail required by cash management regulations

### **Compliance Audits & Audited Financial Statements Policy**

A school that participates in any Federal Student Aid (FSA) program, including a participating foreign school, generally must have an independent auditor conduct an annual audit of the school's compliance with the laws and regulations that are applicable to the FSA programs in which the school participates (a compliance audit), and an audit of the school's financial statements (a financial statement audit).

DSDT participates in a yearly FSA compliance audit conducted under the Inspector General's Audit Guide (for FSA school audits) by a CPA and the Third-Party Auditor, BKD Partners, LLC. This audit is submitted to Department of Education (DOE) annually.

### **Compliance Audits & Audited Financial Statements Procedure**

Responsibilities of the following parties:

#### *School Director & Director of Financial Aid*

- Contacts the CPA by September 1<sup>st</sup> of each year to request documents needed to begin audit
- Submits the documents to the CPA no later than September 1<sup>st</sup>
- Submit the completed audit by December 31<sup>st</sup>

- Wait for Department of Education possible corrections
- Submit corrections by January 15th

### **Cash Management Regulations Policy**

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 Educational Network to provide services to process Financial Aid data, provide training, and make sure DSDT 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 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 it account after the seven-day tolerance period.

Where excess cash balances are disproportionately large or where they represent a continuing problem with 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**

If Pell Grant funds are required to be returned, a school must either enter the student's revised Pell Grant award in the COD System; and or return the funds to the Department through G5, or if applicable, disburse the

funds to other eligible students. *Note that for Pell funds from a prior award year, a school may not use the funds for an eligible student in the current year.*

In addition, if Pell funds are returned after the FISAP has already been filed, the school must make any appropriate changes to the Pell Grant expenditures section of the corresponding FISAP.

If FSEOG funds are required to be returned, a school must:

enter the student's revised FSEOG award both in the individual student's account and the school's FSEOG ledger; and

return the funds to the Department through G5, disburse the funds to other eligible students as applicable, or carry the funds forward to the next award year.

The school must ensure that all changes and adjustments to FSEOG disbursements are properly accounted for in the initial or corrected FISAP.

If a school cannot locate a student to whom it owes FWS funds the student has earned, the federal portion must be returned to the school's FWS account. If the student comes back or the school later locates the student, the school can recover the FWS funds as long as the account for that year is still open. If the account is closed, the school must pay the student (under the wage and hour laws) using its own funds.

In addition, schools must ensure that all unclaimed Title IV credit balance funds are returned no later than 240 days after the date it issued the first check. If an EFT to a student's or parent's financial account is rejected, a school may make additional attempts to disburse the funds, provided that those attempts are made no later than 45 days after the EFT was rejected (attempts cannot exceed the overall 240 day time frame). In cases where the school does not make another attempt, the funds must be returned to the Department before the end of this 45-day period.

### **Cash Management Regulations Procedures**

Responsibilities of the following parties:

*Business Office Representative*

Request funds from Boston Educational Network

Disburse funds to eligible student and/or parent

Manage excess cash

Return funds to the Department of Education

Reconciliation

Report the activities to Third-Party Servicer Boston Education Network

### **Internal Controls Policy**

The Internal Control at DSDT is a system of check and balances. DSDT has a well-organized financial aid office 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 DSDT on its day-to-day operations are based on accurate information.

DSDT 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.

DSDT utilizes BKD Partners LLC, Boston Educational Network, and eZ audit 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 of the following parties:

##### *Business Office Representative*

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

#### **Overtime Charges/Over Contract Charges Policy**

It is the policy of Department of Education (DOE) not to use Title IV funds to pay overtime charges for a student who fails to complete his or her academic program within the normal time frame. Section 472 of the HEA defines cost of attendance as the tuition and fees normally assessed a student carrying the same academic workload required of all students in the same course of study. If a student does not complete their course in the timeframe allotted, they will be charged an additional fee to complete, however Title IV funds may not be used to pay the additional fees.

#### **Overtime Charges/Over Contract Charges Procedure**

Responsibilities of the following parties:

##### *Director of Financial Aid/ Director of Student Services*

- Oversees the attendance hours of all students
- Conferences students on their time and half and absences
- Alerts the Financial Aid and Business office of students who need additional time and possible fees.

##### *Business Office Representative*

- Update charges to ledger card of fees due to additional time needed
- Issue invoices to students
- Collect payments for additional time

### **Student Ledger Procedure for Posting Policy**

DSDT's business office is responsible for most financial accounting. The Director of Administration is responsible for recordkeeping. The remainder of this chapter is designed to help the business office satisfy its accounting responsibilities efficiently and with a minimum of effort.

The business office is responsible for posting to all student ledger cards and maintain accurate records with a detailed description (Sub, Unsub, Pell) of the type of payment posted to the students account. The accounting records and systems for FSA funds must provide a clear audit trail that makes it possible to trace all federal cash from drawdown to its destination. Any student who receives Title IV funds, the school must maintain a student ledger that clearly identifies the date and amount of each transaction, and the balance after each.

### **Student Ledger Procedure for Posting Procedure**

Responsibilities of the following parties:

#### *Business Office Representative*

- As payments are submitted (cash) payments are posted to student ledger within in 24 hours of making the payment.
- As disbursements are made, it is posted to student ledger cards and send disbursement notifications to students via email or in-person paper.

#### *Director of Administration*

- Copies of student ledger cards are printed for Financial Aid folders.
- Issue out recipes via email or printed copies as requested.

### **Awarding Policies and Procedures Policy**

DSDT award policies and procedures as needed to support the services required by governmental and accrediting agencies. These policies are written and shared with parties of interest to ensure that the applicable persons are trained in order to implement them within their departments. These policies and procedures are maintained in hard copies and electronic copies, which are issued to appropriate personnel. They are reviewed and updated as new polices are issued through Boston Education Network, Knowledge Center, and Accrediting Agency and other training entities.

### **Awarding Policies and Procedures Procedure**

Responsibilities of the following parties:

#### *School Director*

- Create Policies and Procedures as needed or required
- Review polices yearly or as needed or required
- Issue polices to specified personnel

#### *Director of Financial Aid*

- Train staff as needed to new policies and regulations
- Supervise and monitor the implementation of policies within all departments

**\*\*\*DSDT does not have any Campus Based Programs at this time.**