

# **DR. IDA ROLF INSTITUTE**

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**Financial Aid  
Policies and  
Procedures  
Manual  
2020-2021**

## **The Vision of the Dr. Ida Rolf Institute is...**

We envision a world in which optimizing structure and function of the human body is an integral part of health and well-being.

## **The Mission of the Dr. Ida Rolf Institute is...**

to provide high quality education and promote research to advance Rolfing® Structural Integration and Rolf Movement® Integration - our proprietary methods for optimizing human structure and function.

## **Rolfing SI and Rolf Movement Service and Trademarks**

In 1979, the United States Patent Office granted service mark rights for the word "Rolfing" to the Dr. Ida Rolf Institute, distinguishing "Rolfing" from all other forms of structural integration. DIRI is the sole owner of the trademark "Rolfing", the brand and all its derivatives.

# INTRODUCTION

The Dr. Ida Rolf Institute (DIRI) and its students are becoming increasingly dependent on financial aid programs because of rising educational costs and the continued availability of funds. An education is an investment in our students' futures. As with any investment, there are sacrifices. A major sacrifice for most students and families is the cost of a higher education. When resources are not sufficient to meet costs, the student may be eligible to receive student aid.

Many factors have resulted in the rapid expansion of financial aid activities at DIRI and have made it increasingly important that the functions of student financial aid administration be defined and published. Additionally, it is necessary for DIRI to have a clear set of definitions and principles of administration.

The Financial Aid Policy and Procedures (FAPP) Manual defines general institutional policies as they relate to basic statutory and regulatory provisions of federal, state, and institutional programs of financial aid. This manual provides a description of standard operating duties of institutional personnel as they relate to the requesting, receiving, disbursing, and accounting for and reporting upon the utilization of student financial aid funds. This manual, when used in conjunction with the other manuals and references, is intended to be an operational guide to the Financial Aid Office (FAO) staff in the daily administration and management of the office. If no policy or procedure addresses a given issue, the FAO staff is expected to use professional judgment based upon the intent of all financial aid programs, the Federal Student Aid Handbook, and office practices.

In summary this manual:

- Provides Administrative staff with current policies and procedures that pertain to eligibility assessment for federal aid programs.
- Provides each staff member with general and specific responsibilities of the total staff, their individual responsibilities, and the Office's relationship to other departments/divisions of the institute.
- Provides each staff member with general office procedures so that a systematic and consistent approach may be taken in the operation of all programs; ensuring that similar operations will be handled in a uniform manner.
- Provides a quick reference to various practices and facilitates the orientation and training of personnel when changes occur.

Documents used to determine student eligibility for financial aid include current regulations published in the:

- Federal Register
- *Department of Education – Financial Student Aid Handbook*
- *Department of Education Blue Book*
- *Department of Education Audit Guide*
- Dear Colleague Letters and other financial aid legislation and other laws or regulation

That impact student aid

- *National Association for Student Financial Aid Newsletters*
- *Financial Aid Counselor's Handbook*
- *Department of Private Occupational Schools, Colorado Department of Education*

***All policies are subject to change at any time, and without prior notice.***

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# Section 1: FAPP Philosophy, Purpose, and Development

## 1.1 General Contact and Operating Information for the Dr. Ida Rolf Institute

OPE Number: 04172500  
DUNS Number: 070388731  
Tax Payers Identification Number (TINS): 237178040  
School Location: 5055 Chaparral Court, Suite 103, Boulder CO 80301  
Hours of Operation: Monday through Thursday, 8:00am to 4:30pm, Friday 8:00am to 3:00pm  
Telephone Number: 303-449-5903  
Fax Number: 303-449-5978  
Email Address and Extension:

Executive Director	<a href="mailto:chowe@rolf.org">chowe@rolf.org</a>	x103
Director of Operations & Systems Management	<a href="mailto:pheckmann@rolf.org">pheckmann@rolf.org</a>	x100
Front Desk	<a href="mailto:info@rolf.org">info@rolf.org</a>	x100
Director of Financial Aid	<a href="mailto:finaid@rolf.org">finaid@rolf.org</a>	x107
Director of Faculty & Student Services	<a href="mailto:StephSherwin@rolf.org">StephSherwin@rolf.org</a>	x101
Director of Admissions & Recruitment	<a href="mailto:admissions@rolf.org">admissions@rolf.org</a>	x106

Public Website: <http://rolf.org>

## 1.2 Philosophy of Financial Aid Office

### Financial Aid Philosophy

The philosophy of Student Financial Aid is to provide access and choice to students, who without such assistance would not be able to attend an institution of higher learning. Financial assistance is offered in the form of grants and federally-funded programs. Financial assistance is viewed only as supplementary. The student and the family of a student, when applicable, are expected to make a maximum effort to assist with educational expenses.

It is the policy of the Dr. Ida Rolf Institute (DIRI) to award federal financial aid in accordance with federal regulations and guidelines pertaining to the type of assistance requested.

The Financial Aid Office at DIRI is aware that each student's aid eligibility will differ and may require in-depth attention and follow-up to ensure the student's satisfaction and understanding of the Financial Aid Office's awarding and packaging principles. Our primary objective is to assist students and families in planning for and meeting expenses associated with attendance at the Rolf Institute. The focus is on establishing aid eligibility, awarding scholarships, grants, loans, and veteran's education benefits. The Financial Aid Office provides financial aid counseling to students and families to ensure their understanding of the financial aid awarding process and how those awards relate to the student's established program length and to resolve any problems or issues associated with financing an education.

### 1.3 Purpose

The primary purpose of the Dr. Ida Rolf Institute Financial Aid Office is to provide resources to students of academic ability who would otherwise be unable to pursue post-secondary education due to financial constraints.

To accomplish this purpose the DIRI Financial Aid Office will follow the procedures:

1. Assist and educate students in completing a Free Application for Federal Student Aid (FAFSA), forms, and other documents accurately and submitting them in a timely manner.
2. The Financial Aid Office will assist students in seeking other financial resources available to them.
3. The Financial Aid Office will, in an ethical manner, make every effort to meet the demonstrated needs of all students at DIRI, to the extent that funds are available.
4. Adequate control will be exercised to ensure that aid awards do not exceed documented need. Students will be informed of all conditions under which an award is granted at the time the aid offer is made.
5. Provide a clear statement of estimated cost of attendance, which will include fees, room and board, commuting expenses, supplies, personal expenses, and daycare.
6. Maintain individual student financial aid files for each student who possesses a rightful claim to assistance monies at DIRI. These records shall indicate the total student need and any types and amounts of financial assistance received by the student and are kept secured and confidential.
7. The Financial Aid Office will respect the confidentiality of student records and protect the privacy of students and families as set forth in the Family Educational Rights and Privacy Act (FERPA) of 1974. To protect the privacy of students and families, federal law sets certain conditions on the disclosure of personal information from records kept by schools that participate in the Student Financial Aid Programs.
8. Monitor communication channels so that the students personally relate any financial aid status changes to the Financial Aid Office. Whenever information about a change in student financial aid status is received, the Financial Aid Office must verify continued eligibility on all funds awarded.
9. Work closely with the Admissions Department, Accounting Office, faculty and staff by gathering and disseminating information about students to the aforementioned office.
10. Work with agencies outside of DIRI exchanging financial aid information on current students, that will benefit students such as:
  - Welfare Programs
  - Veteran's programs
  - Scholarship Programs

## 1.4 Policies and Procedures Development Responsibilities

Today's financial aid programs for postsecondary students were established with passage of the [Higher Education Act of 1965](#), as amended (HEA). The Department of Education offers a broad range of programs under the umbrella of the Higher Education Act. Federal, state and institutional financial aid programs have provided access to higher education for millions of students over the past four decades and, as such, have had a deep and lasting impact on the nation.

Federal regulations mandate that institutions have written policies and procedures. Beyond the federal requirement, there are many benefits to having a written document outlining Financial Aid Office's policies and procedures:

- for distribution to appropriate persons outside the Financial Aid Office (FAO)
- for informing and fostering an understanding of the complexity and operation of the FAO
- for FAO staff to use as a referral guide to assist in maintaining consistency in the problem-solving process
- as an important component of a comprehensive training program.

The Financial Aid Policies and Procedures (FAPP) Manual is developed by the DIRI administration and Board of Directors for Financial Aid Administrators, institutional staff, and students or parents. The manual is constructed for the office staff to better understand the Financial Aid programs and how the Rolf Institute will deliver them. This manual does not and cannot present every circumstance that might occur. This manual is abridged from the statutory regulations governing federal, state and institutional Financial Aid programs and is therefore not a substitute for understanding the statutes and regulations themselves.

Updates to the FAPP Manual are the responsibility of the DIRI administration – including the Executive Director, the Chief Financial Officer, the Director of Operations & Systems Management, the Director of Faculty & Student Services, and the Director of Financial Aid – and are approved by the Board of Directors. The DIRI administration will work collaboratively with all third-party service providers to ensure that the FAPP Manual accurately reflects the roles and responsibilities of each party and includes important information regarding the most recent federal and state statutes and regulations for administering financial aid.

The FAPP Manual will be reviewed and revised no less than every two years. To ensure timely revisions, the task will be placed on the Executive Director and Board of Director's annual calendars. Parties will be notified by the Executive Director's through an e-mail for the need to review, update, and revise the FAPP Manual. The ED will lead, or will delegate to a chair, the responsibility to coordinate the policy review process. The DIRI Board President will ensure that the policy is finalized and approved by the Board of Directors.

Any changes will be done in the electronic version of the manual located online under the Financial Aid Office's section of the DIRI *MemberLeap* System, with dates for the revision noted in Appendix E of FAPP Manual. The DIRI Financial Aid Policies and Procedure Manual will also be made available in hard copy upon request and will be available on the Institute's website.

As necessary the team responsible for revising the FAPP Manual will utilize NASFAA developed tools to assist in the formulation, implementation, evaluation, and revision of the policies and procedures manual including tools related to Reading and Interpreting Regulations and Statutes, Regulatory Resource Guide, and other published tools developed for Formulating, Implementing, and Evaluating Policies and Procedures.

The DIRI Board of Directors is charged with the ultimate fiduciary responsibility to ensure that the FAPP Manual is fully implemented. Therefore, revised sections or versions of the FAPP manual will be approved by the DIRI Board of Directors.

## **Personnel Responsible for FAPP Manual**

### ***Board of Directors***

**Board Chairperson:** Responsible for ensuring that policy approvals and complete and accurate policy indexes are maintained on an annual basis.

**Board Secretary:** Responsible for recording all Board of Director resolutions, and maintaining accurate and complete Board minutes, including resolutions related to policy work.

### ***Administration***

**Executive Director (ED):** Responsible for ensuring that all DIRI Policies manuals are fully aligned with state, federal and accreditation statutes and regulations. Will ensure that all deadlines are met for maintaining state licensing, accreditation and Educational Certification for the administration of Title IV Funding. The ED is responsible for sup revising and evaluating the implementation of DIRI policies.

**Director of Operations & Systems Management:** Responsible for system integration, managing facilities and supplies, basic accounting, staff support, distribution and organization of Publications orders, and front desk and reception duties. Will ensure that staff receives adequate annual training related to implementing Federal and State statutes and regulations. Will provide professional judgment and support of staff in cases where the statutes, policies, or procedures do not provide clear guidance.

**Director of Faculty & Student Services:** Responsible for supervising and evaluating all things relating to the faculty and ensuring that DIRI policies are fully understood and implemented. Will provide professional judgment and support of staff in cases where the statutes, policies, or procedures do not provide clear guidance.

**Director of Financial Aid:** Responsible to fully implement the FAPP Policies and Procedures, and to create and communicate additional processes where needed to support their effectiveness. The Director of Financial Aid is responsible for completing annual training in Federal and State regulations for Title IV, HEA administration and implementation. Based on training, the Director will provide feedback on revisions needed to the FAPP manual and coordinate with third-party service providers to ensure that all parties reviewed and implement the latest version of the FAPP manual.

**Third Party Service Providers:** Will review the FAPP Manual and make recommendations for changes to the Executive Director or to the Director of Financial Aid. Service providers are responsible for understanding the Policies and Procedures and the related Federal and State statutes and regulations.

## 1.5 Documents and Methods

The Rolf Institute will use several documents and methods to ensure that staff keeps abreast of new regulations, laws and U.S. Department of Education (USDE) policy guidance that might impact the Financial Aid Offices' policies and procedures. Appendix A of this FAPP Manual includes a list of resources and reference documents. This list of resource publications will be maintained and updated as part of the policy revision process and will be used by the staff in the Financial Aid Office, the Accounting Office, and Educational Services Office for training and understanding more fully the items included in the policy manual.

The Executive Director, Director of Operations & Systems Management, Director of Faculty & Student Services, and Director of Financial Aid will utilize the USDE Information for Financial Aid Professionals (IFAP) located at the website <http://www.ifap.ed.gov> for their notification service that sends subscribers daily or weekly emails of recent IFAP postings, such as Dear Colleague Letters, Electronic Announcements, and *Federal Registers*. Although schools are not required to subscribe to this notification service, DIRI staff must maintain access to IFAP (see [CFR 668.16\(o\)](#)).

Additionally, NASFAA's ([National Association of Student Financial Aid Administration](#)) daily *Today's News* announces changes to the statute regulations and USDE guidance as they occur. The Financial Aid Office, and other institutional personnel, should subscribe to these services.

## 1.6 Financial Aid Forms

The following is a list of forms used by the Financial Aid Office. The processing time for most forms is up to two (2) weeks. The Financial Aid Office requires approximately two (2) weeks from the date the document is submitted, provided the student's file is complete and ready for processing.

- 1.0 Intent to Apply for Financial Aid/ Veteran's Education Benefits
- 2.0 Free Application for Federal Student Aid ([www.fafsa.gov](http://www.fafsa.gov))
- 3.0 Entrance Counseling ([www.studentaid.gov](http://www.studentaid.gov))
- 4.0 Exit Counseling ([www.studentaid.gov](http://www.studentaid.gov))
- 5.0 Direct Loan Master Promissory Note ([www.studentaid.gov](http://www.studentaid.gov))
- 6.0 PLUS Master Promissory Note- if applicable ([www.studentaid.gov](http://www.studentaid.gov))
- 7.0 PLUS Pre-Approval Form (For Parent Loan for Undergraduate Students)
- 8.0 Institutional Student Information Report (ISIR)
- 9.0 Verification Worksheets
- 9.1 Verification Result Notification
- 10.0 Certification of unsuccessful attempts to obtain verification of non-filing status from the IRS

- 11.0 Unusual Enrollment History Form
- 12.0 C-Code comment 399 Resolution Worksheet
- 12.1 C-Code Verification Result Notification
- 13.0 Request for Status Information Letter
- 14.0 Failure to Register for Selective Service Determination Form
- 15.0 Low Income Clarification Form
- 16.0 Award Notification Letter
- 17.0 Cost Breakdown Analysis
- 18.0 Financial Aid Emails
- 19.0 FDSL Certification Worksheet
- 20.0 Authorization to Hold a Credit Balance- Student
- 21.0 Professional Judgment Appeal Form
- 22.0 Professional Judgement Adjustment Worksheet
- 23.0 In-School Deferment Form
- 24.0 Financial Aid File Checklist
- 25.0 VA Benefits Checklist
- 26.0 SAP Calculation Worksheet
- 27.0 SAP Appeal Form
- 28.0 Learning Plan Form
- 29.0 Admissions Process Online
- 30.0 Roling SI Basic Training Enrollment Agreement
- 31.0 1098-T Form
- 32.0-32.1 Payment Plan Form
- 33.0 FERPA Release Form
- 34.0 HIPAA Release Form
- 35.0 Cohort Change Request Form
- 36.0 Leave of Absence Form
- 37.0 Withdrawal Form
- 38.0 Federal Return to Title IV (R2T4) Form
- 39.0 Institutional Refund Calculation Form
- 40.0 Post-Withdrawal Disbursement Authorization Form
- 41.0 Financial Aid Cancellation
- 42.0 Exit Counseling Guide
- 43.0 Reinstatement Form
- 44.0 Periodic File Review Checklist

## **1.7 Data on Number of Students Receiving Financial Aid**

A cohort default rate is the percentage of a school's borrowers who enter repayment on certain Federal Family Education Loan (FFEL) Program or William D. Ford Federal Direct Loan (Direct Loan) Program loans during a federal fiscal year (FY), October 1 to September 30, and default or meet other specified conditions prior to the end of the second following fiscal year. Please refer to the Cohort Default Rate Guide for a more in-depth description of cohort default rates and how the rates are calculated.

All schools must enroll in eCDR to receive cohort default rate notification. Schools may [check their eCDR enrollment online](#) or by calling CPS/SAIG Technical Support at 800-330-5947.

Current Student Enrollment: 51 (2019-2020)

% Students Receiving Title IV: 43 % (2019-2020)

Title IV Participation G5/COD: 2019-2020 Award Year (*as of 03/02/2020*)

Federal Pell Grant \$27,777

Direct Subsidized,

Unsubsidized and PLUS Loans \$78,187

**Default Rate FFEL/DL based on Official Cohort Default Rate Search for Postsecondary Schools**

2019 0.0% (subject to change)

2018 0.0% (subject to change)

2017 0.0% (subject to change)

2016 1.7%

2015 1.3% (rate was based on one student who had loans refunded in full in 2018)

2014 0.0%

2013 0.0%

## Section 2: Administrative Organization & Office Management

### 2.1 Administrative Capacity

#### Adequate Checks and Balances

Effective January 1, 2020, The Dr. Ida Rolf Institute no longer contracts with Gemcor, Inc. The chart below shows how Gemcor's previous responsibilities will be distributed.

<u>Task</u>	<u>Frequency</u>	<u>Responsible Party</u>
Receive ISIRs from Dept of Ed via EdConnect Transmission	M, W, F of every week	Director of Financial Aid (DOFA)
Review Verification and "C" Codes on ISIRs (if applicable)	as needed	DOFA/ Director of Operations & Systems Management
Make ISIR corrections via CPS (if applicable)	as needed	DOFA
Package student aid in EdExpress	as needed	DOFA
Check COD for MPNs and Entrance Counseling	twice weekly	DOFA
Submit origination/ fund requests to Dept of Ed via EdExpress/ EdConnect	as needed	DOFA
Request funds from G5	as needed	DOSM
Receive funds into Federal Funds Account	1-2 days from G5 rqst	AcctTwo/ Notify DOFA
Post Disbursements to Student Accounts	within 3 bus days of funds settling in Fed Funds Acct	DOFA
Submit refunds to Dept of Ed via EdExpress/ EdConnect	as needed per withdrawals or reallocation of aid	DOFA
---Move funds from Operations to Federal funds due to refunds	as needed prior to submitting refunds to G5	AcctTwo
Submit refunds via G5	as needed	DOSM
Move funds from Federal Funds to Operations (keep Fed Funds at \$5,000 or more)	as funds come in	AcctTwo
Reconcile Federal Funds bank account with G5 funds activity	monthly	AcctTwo
Reconcile disbursements with Dept of Ed/ COD	monthly	AcctTwo
Financial Aid Audit	annual	TBD
FISAP	annual (next due 10/1/2020)	DOFA
NSLDS enrollment report	bi-monthly (odd months)	DOFA
Periodic File Review	quarterly	Executive Director (ED)

#### ***Additional Institutional Responsibilities:***

- State licensure, accreditation, and USDE eligibility and certification for facilities and programs.
- Institutional Policies and Procedures
- Consumer Information
- Student contact and advisement
- Attendance and satisfactory academic progress documentation
- Confirmation of student eligibility
- Disbursement of federal student aid to eligible recipients
- On-campus staff management
- Withdrawal determinations and calculations
- Placement and enrollment reporting
- Protection of Personal Identifiable Information (PII) from unauthorized access

## **2.2 Separation of Duties**

### **Financial Aid Positions & Responsibilities**

#### ***The Financial Aid Office***

The Financial Aid office may employ up to two (2) full-time employees on the Rolf Institute Campus; one (1) Director of Financial Aid, and one (1) Assistant to Financial Aid. The Financial Aid office is responsible for administering and managing applications for Direct Loans, Pell Grant Funds, Veteran's Education Benefits, and scholarships.

#### ***Director of Financial Aid***

##### **Primary Responsibilities**

The primary responsibilities of the Director of Financial Aid are to assemble and maintain student aid records, assess eligibility of applicants for aid, authorize aid, and complete federally mandated reports. He/she is also responsible for designing and implementing systems to accomplish these tasks. This position requires knowledge of federal regulations, institutional policies and procedures, ability to deal with students about sensitive issues and the ability to deal with continually changing program regulations.

##### **Specific Responsibilities**

- Maintaining student financial aid records/files
- Authorizing and processing Pell Grant and Direct Student awards and payments
- Importing student ISIRs through the Department of Education's EdConnect Database
- Process Title IV program awards including the determination of student awards, preparation of daily award journals, and daily submission of all award origination records to the COD System
- Verifying application data on selected applicants
- Calculating student Pell Grant and Direct Student awards
- Collecting attendance sheets and progress reports for satisfactory academic progress
- Calculating return of funds or overpayments when student withdraws
- Maintaining up-to-date knowledge of relevant federal regulations
- Coordinating fiscal matters with the accounting department, including cash requests, cash accountability and cash disbursements
- Revising Financial Aid Manuals
- Preparing Federal Title IV Reports
- Validating student attendance and ensuring that faculty formally approve summary attendance documents
- Completing bi-monthly Enrollment Reporting through the National Student Loan Data System (NSLDS)
- Processing payments for Veteran's
- Responsible for issuing an annual survey of all graduates regarding placement
- Responsible for providing annual placement data to accrediting agency
- Ensures students fill out Student Evaluations

- Review verification and “C” code material on ISIRs containing verification or “C” code flags in accordance with federal guidelines except when the institution approves such files under its own authority.
- Initiate requests for the electronic transfer of Title IV fund into the institute’s federal funds checking account for disbursement of said funds to eligible students by the Institute.
- Prepare, and electronically transmit daily to the USDE, information supporting the institution’s disbursement or return of HEA, Title IV federal student financial assistance funds to eligible recipients.
- Update and alert individuals at the institution of changes in federal regulations and statutes, which affect the programs covered under this agreement, through seminars, newsletters special bulletins, and electronic mail.
- Prepare and file the institution’s annual Fiscal Operations Report and Application for Funds (FISAP) with data supplied by the institution.
- Perform periodic sampled file reviews of recipient information in accordance with federal regulations.
- Have an internal control audit performed on DIRI’s systems and on the compliance of its procedures with federal regulations. A Certified Public accounting firm will perform such audit annually.
- Other duties as needed

The Director of Operations and Systems Management is responsible for requesting funds through G5 upon request from the Director of Financial Aid.

### ***Offices of Educational Services***

The Education Department employs four (4) employees including one (1) full-time Director of Admissions & Recruitment, one (1) full-time Director of Faculty & Student Services, one (1) full-time Director of Financial Aid, and one (1) part-time Clinic & Communications Coordinator.

### **Primary Responsibilities of the Education Department**

The offices of Educational Services oversee all the support functions for educational administration, including student recruitment, admissions and enrollment, scheduling, faculty assignments and contracts, classroom supply purchasing, student evaluations, and student academic progress and graduation.

### **Specific Responsibilities of Education Department Personnel**

#### ***The Director of Faculty & Student Services***

- Reports to Division of Occupational Private Schools
- Responsible to finalize the Academic Calendar for each year
- Responsible for updating the Enrollment Reporting spreadsheet each week
- Responsible for issuing Faculty Contracts and Payroll requests to Accounting Office
- Approves student Leave of Absences
- Monitors all students on Academic Learning Plans
- Notification to students regarding Satisfactory Academic Progress (SAP), including issuing formal SAP warnings, suspensions, reinstatements
- Oversees any SAP appeal processes

### ***The Director of Admissions & Recruitment***

- Responsible for overseeing the admissions process and registration of students into each phase of the program.
- Responsible for ensuring that students who withdraw complete a documented “withdraw” form, and for notifying the Financial Aid Office.
- Receiving and documenting student deposits
- May take and document student tuition payments
- The Director of Admissions coordinates with the Director of Faculty & Student Services to review the Satisfactory Academic Progress of students, and to report to the Director of Financial Aid the status of each student

### ***The Clinic & Communications Coordinator***

- Responsible for securing community clients for the classroom clinics
- Responsible for processing payments for clinic clients
- Responsible for managing linens for all student clinics
- Responsible for community outreach and awareness
- Community liaison

### **Third Party Service Providers**

#### ***AcctTwo Shared Services, LLC - Accounting Service Provider***

1111 North Loop W, Suite 250, Houston, TX 77008

Angela Gonzales, Client Controller

E-mail: [agonzales@accttwo.com](mailto:agonzales@accttwo.com)

Phone: 713-744-8400 (main)

Direct: 713-744-8480 (direct)

[www.intacct.com](http://www.intacct.com)

DIRI contracts out all back-office accounting functions to AcctTwo, Inc. and utilizes the online platform, Intacct, for completing approvals, posting transactions and financial reporting. The AcctTwo team includes one (1) Controller, one (1) Project Controller, one (1) Senior Accountant, one (1) Accounts Payable Analyst, and one (1) Payroll Clerk.

#### **Primary Responsibilities of AcctTwo:**

The Controller of AcctTwo is responsible for transferring funds moved to the DIRI Financial Aid account and for overseeing all DIRI General Ledger accounting functions including cash, payroll, accounts payable, accounts receivable, monthly/quarterly/annual financials and annual audit coordination.

AcctTwo will also monitor an individual federal checking account, including sequential transaction numbers for tracking and audit trail purposes as well as reconciliation of the account’s monthly statements.

#### ***Wright International Student Services (WISS)***

6405 Metcalf Ave, Ste 504, Shawnee Mission, KS 66202

Katie Saunders, Client Manager  
E-mail: [katie@studentservicesint.com](mailto:katie@studentservicesint.com)  
Phone: 800-257-4757, ext 3555  
Fax: 913-677-0977  
[www.cohortrpt.net](http://www.cohortrpt.net)

DIRI contracts all Default Prevention activities to Wright International Student Services (WISS). WISS is default management company. If students are nearing default, DIRI will reach out to them in addition to WISS to try to get them back on track.

### **Primary Responsibilities of WISS:**

WISS is a default management company that works to aid students in keeping their Federal Loan accounts in good standing. WISS contacts students by phone and mail.

### **Specific Responsibilities of WISS:**

1. To update the WISS system with student account information received or obtained from DIRI, the loan Guarantor, or Loan Serving Company.
2. To attempt to assist students in bringing their student loan accounts current, and/or prevent their default.
3. To attempt to locate students who have moved without a forwarding address or telephone number.
4. To provide the student with a monthly summary of students that WISS is tracking and has assisted.

### ***Credit Service Company, Inc.***

PO Box 1120, Colorado Springs, CO 80901  
Julie Boots, Client Relations Executive  
Madison Martins, Client Services Representative  
Andy Williamson, Director of Client Services  
Email: [julieb@creditservicecompany.com](mailto:julieb@creditservicecompany.com)  
[madisonm@creditservicecompany.com](mailto:madisonm@creditservicecompany.com)  
[andreww@creditservicecompany.com](mailto:andreww@creditservicecompany.com)  
Phone: 719-634-3766; Toll Free: 800-467-3766  
Ext: 1202- Julie  
Ext: 268- Susan  
Ext: 1212- Madison  
Ext: 1201- Andy  
<http://www.creditservicecompany.com/home.html>

DIRI contracts all collection activity to Credit Service Company, Inc. (CSC). The CSC team includes one (1) Chief Executive Officer (CEO)/ Owner, one (1) Executive Director, one (1) Client Relations Executive, one (1) Director of Sales & Marketing, one (1) Director of Client Services, one (1) Compliance Officer, one (1) Director of Collections, and several Client Services Representatives.

### **Primary Responsibilities of Credit Service Company, Inc.:**

The Client Services Representative at CSC is the first point of contact for DIRI. Their responsibility is to manage the collection files that DIRI deemed uncollectable. CSC will use resources such as 411.com, Social Media accounts, Internet Search Tools, Lexus Nexis, and many other resources to locate invalid student information for collection purposes. CSC will contact students via phone and mail to attempt collections on their student debts.

CSC works on a commission basis. They do not collect any fees from DIRI until they have successfully collected on an account.

## **2.3 General Financial Aid Office Administration**

### **Clock-hour schedule for Financial Aid Activities**

#### **731 Clock-hour Program:**

Payment Period One 0-365.5 successfully completed clock hours

- First disbursement brought in within the first 30-days of attendance, but no earlier than 30-days for first-time borrowers.

Payment Period Two 365.5-731 successfully completed clock hours

- Second disbursement brought in once student has successfully completed 365.5 clock hours and 11 weeks of Instruction.

SAP Review	218 Hours Phase I Final Cumulative Score
	365.5 Hours Phase II Midterm Cumulative Score
	462 Hours Phase II Final Cumulative Score

#### **600 Clock-hour Program:**

Payment Period One 0-300 clock-hours

Payment Period Two 300-600 clock-hours

SAP Review	87 Hours Phase I Cumulative Score
	300 hours Phase II Midterm Cumulative Score

\*\*The 600 clock-hour program is not currently eligible for Federal Financial Aid is therefore exempt from SAP policy.

### **Correspondence**

The Office Manager routes general administrative correspondence to the appropriate staff member. If an appropriate recipient is not identifiable, the correspondence should be given to the Executive Director for evaluation and delegation. Where appropriate, correspondence should be responded to within one week. If a staff member is responding to a specific complaint, it is typical procedure for the staff member to have the Executive Director or Director of Faculty & Student Services review the correspondence. This allows the Executive Director/ Director of Faculty & Student Services to be aware of potential problems. Emails should be responded to immediately or within 24 hours.

## **Telephone**

Telephone calls are answered in a friendly and professional manner (i.e. Financial Aid Office, this is “Jane”. May I help you?). Typically, the Financial Aid Administrator will receive incoming calls from the Office Manager. If an Administrator is unavailable, the call is routed to the Financial Aid Office’s voicemail. Every attempt is made to return calls the same business day, and no later than the next business day.

## **Staff Meetings**

Staff meetings are held every Thursday at 10:00 am. The Executive Director has an open-door policy and welcomes staff to enter and converse about policy, procedures and student files.

## **Accommodations for Students and/or employees with Disabilities**

The Rolf Institute provides accommodations for students and employees with disabilities according to the American Disabilities act. Students with physical or learning disabilities may receive a 504 plan and/or an Individual Learning Plan (ILP).

## **2.4 Information Sharing & the Family Educational Rights and Privacy Act of 1974 (FERPA)**

### **What is FERPA?**

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

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

At the postsecondary level, parents have no inherent rights to inspect a student’s education record. The right to inspect is limited solely to the student. Records may be released to parents only under the following circumstances: (1) through the written consent of the student using the FERPA Release Form, (2) in compliance with a subpoena.

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

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

## **Employees**

Employees of The Dr. Ida Rolf Institute (DIRI) may have access to student education records. Their confidentiality, use, and release are governed by FERPA. Employee utilization of this information is governed by the regulations and the duties and responsibilities of their employment and position. Unless their job involves release of information and they have been trained in that function, any requests for disclosure of information, especially from outside the school, should be referred to the Director of Faculty & Student Services. Release of information

contained on a student's record without the written consent from the person identified on the document is in violation of Sec. 438 Public Law 90-247.

All employees have their own accounts and passwords on the administrative computer system and on e-mail. Staff members are responsible for their personal account and will be held accountable for any improper use. Protection of sign-on password and procedure is critical for security. An employee password is the only protection an account has, and the only way the computer system can verify that the staff member is who they say they are.

In Summary, remember . . .

- Staff must check a person's picture identification when releasing education records. Staff must always check to see if the student permitted disclosure of information before they release any information on the student.
- Staff must not discuss a student's record with any person who does not have a legitimate educational interest, as doing so is a violation of FERPA. This pertains to conversations on- and off-the-job.
- Staff may not remove any document from the office for non-business purposes, as doing so is a violation of FERPA.
- Staff may not release confidential student information (non-directory) to another student, college or university, organization, or to any person who does not have a legitimate educational interest, or to the parents of a dependent student without the student's written authorization, as doing so is in violation of FERPA.
- Staff may not leave reports or computer screens containing confidential information in view of others who do not have a legitimate educational interest in the data or leave their computer unattended as doing so is in violation of FERPA.
- Staff may not make personal use of student information as doing so is in violation of FERPA.
- Staff may not allow another person to use their computer access code as doing so is in violation of FERPA.
- Staff may not put paperwork in the trash with a student's information (i.e., social security number or grades) as doing so is also in violation of FERPA.
- In addition to the possibility of personal litigation, proven FERPA violations may result in loss of federal funds to The Rolf Institute.
- Violation of confidentiality and security may lead to appropriate personnel action.

## **2.5 Records Management and Retention**

### **Location of Records**

Financial aid records are kept in the Financial Aid office of the Rolf Institute, in Boulder, CO. The Director of Financial Aid has the responsibility for maintaining these files and records. The Rolf Institution retains all financial aid records and files as required by law for five (5) years from the end of the award year for which the aid was awarded.

### **Confidentiality and Inspection of Student Records**

All information (written or oral), that a student and/or family provides, in the process of seeking assistance is confidential. Access to this information is restricted to the Director of Financial

Aid. Application materials become the property of the Rolf Institute upon submission and are maintained in the student's file.

### **Disclosure Authorization**

When extraordinary circumstances exist that prevent the student from accessing and understanding financial aid information, the financial aid staff will discuss normally confidential information with the individual(s) the student designates on the FERPA Release form. Students may request a FERPA Release from the Financial Aid office. Students must complete and sign the Release of Information Authorization form in the Financial Aid office in the presence of a financial aid staff member. Students can rescind the FERPA Release form at any time. Due to the highly sensitive nature of financial aid and academic information, facsimiles, photocopies or mailed copies of the FERPA Release form will not be accepted.

## **2.6 Financial Responsibility**

### **Federal Cash Management**

Federal Regulations prohibit institutions from maintaining excess federal cash on hand. DIRI uses a "records first" approach to federal funds management meaning that records supporting the institution's disbursement of Title IV funds are submitted to COD for approval before any federal cash is requested for those awards. DIRI's cash management policies are substantially similar to the USDE's required processes under the heightened cash monitoring method of payment (HCM1). Federal cash is not drawn down in advance for future, anticipated disbursements nor is federal cash maintained in the institution's bank account without an immediate need for the disbursement of those funds to eligible students. This policy provides strict controls over instances of excess cash or instances of federal funds being used for other than their intended purposes.

On a periodic basis, cash is requested through the G5 website system by the Director of Operations and Systems Management, only in an amount necessary to cover student awards that have been accepted by COD as of that day and that are included the Daily Award Journal. In most cases, the funds are wired into the institution's federal funds escrow account on the following business day, but within three business days. Upon receipt of those funds into the DIRI federal funds bank account, the DIRI accounting office can simply logon to the online banking system and transfer the amount shown on the Daily Award Journal from the federal funds bank account into the DIRI general operating account. In any event, occasionally auditors may still attempt to cite for excess cash maintenance due to an incorrect interpretation of cash management regulations.

### **Daily Functions**

DIRI processes federal financial aid awards as needed. Upon receipt of disbursement or refund information, federal award origination and disbursement records are submitted electronically to the Common Origination & Disbursement (COD) System via EdExpress/EdConnect. After the COD approved daily awards have been recorded, the Director of Operations & Systems Management will request the necessary funds for these awards using the cash management policy identified above. As part of the daily cash request processes, DIRI federal authorizations in the G5 system are routinely compared to the actual awards accepted by COD in that day's

batch to ensure that student awards for that day have been fully authorized by the USDE, and that the disbursement of the award by the institution has been accepted by COD before cash request for federal funds is initiated. Federal cash is not requested for any student awards that have not been accepted by COD.

A Daily Award Journal is prepared for DIRI listing the students and amounts of COD accepted disbursement records. DIRI will ensure that the date entered into the student ledger is the same as that noted in the Daily Award Journal and is consistent with the date of disbursement listed in the COD system.

### **Weekly Functions**

During each calendar week an analysis is performed multiple times on all accounts to determine the possible existence of federal cash on hand. Cash on hand will only result from money deposited by institutions for refunds, which has not been used to fund other current disbursements. In cases where refunds result in unused cash on hand, the cash will be returned to the department electronically through the Grants Administration and Payment (GAPS/G5) System to ensure that unallocated federal cash is not maintained for more than three business days.

### **Monthly Functions**

Each month AcctTwo will reconcile DIRI's federal funds bank account with the general ledger to ensure accurate cash accountability. In the event bank service charges are assessed to the institution's federal funds account, DIRI will be responsible to pay for those fees.

DIRI also receives Federal Direct Student Loan (FDSL) account statements from the department each month reflecting loan cash and disbursement activities for the institute. These reports are reconciled against internal records to ensure loan activity is properly reconciled and that all transaction in the system balance.

### **Bi-Monthly**

Every 60 days the USDE will generate a roster of student enrollment information from records maintained in the National Student Loan Data System (NSLDS). The purpose of this roster is for the institution to review and update changes in students' enrollment statuses and graduation or withdrawal dates. This updated information is used by the USDE to track the commencement of the repayment cycle for student loan borrowers. The deadline for DIRI to update information on this bi-monthly roster is only 15 days.

### **Quarterly Functions**

On a quarterly basis, all Title IV program activity for all federal awards in DIRI's systems is reconciled with the department's COD and GAPS systems. DIRI staff completes "Audit Packages", identifying all federal aid activity and cash accountability for the school for both the most recently completed institutional fiscal year, as well as for the most recently completed federal award year. DIRI also has an annual compliance audit performed on its administration of federal aid program funds for the institution. DIRI will also annually prepare and file the Fiscal Operations Report and Application for Funds (FISAP). This annual report, due at the end of

each September, is required to be filed for institutions that participate in any of the federal campus-based programs.

### **Account Reconciliation**

DIRI Title IV funds flow through a special escrow checking account set up by the institution. The title of this account reflects the institution's name as well as the phrase "federal funds account". Only federal aid funds flow through this account. If there are monthly service fees on this account, those fees are the responsibility of DIRI and should be reimbursed to the account. It is recommended that DIRI deposit an amount sufficient to cover six to twelve months of estimated service charges into the federal aid account. This is not considered as maintaining excessive cash on hand since the money is institutional rather than federal. Funds are requested by the Director of Operations & Systems Management to cover award checks processed daily. The DIRI Accounting Department routinely reconciles the DIRI federal student aid bank account monthly. The Director of Financial Aid sends the statements on the DIRI federal aid account directly to the AcctTwo office.

### **Federal Reporting**

The Financial Aid office regularly files Pell Grants and Direct Loan program reports. These reports include periodic GAPS Cash Accountability or Confirmation Reports, annual FISAP Reports, and daily Common Origination and Disbursement (COD) reporting of federal award disbursements. Electronic Pell and Direct Loan Payment Data reports are done daily as DIRI awards funds to students. This practice of daily origination and disbursement record submissions ensures continual flow of authorization adjustments.

The Financial Aid office receives electronic acknowledgements of these reports from the Department. These results are compared to data submitted for every student to ensure accurate and timely Pell and Direct Loan payment data reporting. The DIRI authorization levels are monitored daily to ensure up-to-date information. Receiving accepted confirmations from the Department for every student award prior to issuing payment provides the highest level of compliance and accuracy for the DIRI federal aid program.

### **Audits**

To ensure operational integrity, to minimize costs of having federal aid programs audited, and to comply with federal legislation, DIRI has a formal audit performed on its internal control procedures annually. A CPA, when auditing federal aid program activity, can rely on DIRI's audit of internal controls. This prevents him/her from having to travel to DIRI's offices to audit policies and should keep DIRI audit costs low.

For each fiscal year, DIRI is required to have a compliance and financial audit performed. An independent certified public accounting (CPA) firm must perform these audits. The audits are due at the USDE within 6 months of the end of DIRI's fiscal year. These audits are unique and require the experience of professionals who have a history of performing Title IV compliance and financial audits.

Audits are time-consuming processes, and the Financial Aid office will need time to professionally prepare the institution's "audit package" so that it is available when the auditors are performing their examination.

## **Section 3: Satisfactory Academic Progress Policy**

### **3.1 Introduction**

The Dr. Ida Rolf Institute offers two certification programs in Rolfing Structural Integration. Each program has three phases, which must successfully be completed for certification. The Basic Rolfing Certification program ("Basic") is designed for students with no experience in bodywork and requires 731 clock hours or a total of 22 weeks of instructional time in the classroom. The Regional Basic Rolfing Certification program ("Regional") is designed for students with a license and/or extensive experience in bodywork and requires 600 clock hours or a total of 18 weeks of instructional time in the classroom.

The Satisfactory Academic Progress (SAP) Policy applies to all students enrolled in any structural integration certification program at the Rolf Institute. Students receiving financial aid are held to the same requirements as any other student for meeting SAP standards and may be reviewed at additional times for SAP compliance prior to a financial award disbursement being made.

### **3.2 Summary of Satisfactory Academic Progress (SAP) Requirements to Remain Eligible for Financial Aid**

Students enrolled in either of the Rolfing Certification programs must meet the requirements below (and, if applicable, to remain eligible for all types of financial aid ):

- Be enrolled as a full-time student in each of the three phases of the program. (Note: The Basic and Regional Programs do not allow for part-time enrollment in either Program.)
- Finish the program within the Maximum Time Framework of no more than 150% of normal program clock hours required for each program.
- Have successfully completed at least 67% of the cumulative clock hours of scheduled attendance at the end of each payment period.
- Maintain a minimum C average (no less than 70%) by the final of Phase I (218 clock hours), and a cumulative C average (no less than 70%) by the midterm of Phase II (366 hours) and by the final of Phase III (731 hours).

### **3.3 Timetable for Measuring Satisfactory Academic Progress**

All enrolled students are evaluated for Satisfactory Academic Progress at the end of Phase I and at the mid-point of the program as follows:

#### **Clock-hour schedule for Financial Aid Activities**

##### **731 Clock-hour Program:**

Payment Period One 0-365.5 successfully completed clock hours

- First disbursement brought in within the first 30-days of attendance, but no earlier than 30-days for first-time borrowers.

Payment Period Two 365.5-731 successfully completed clock hours

- Second disbursement brought in once student has successfully completed 365.5 clock hours and 11 weeks of Instruction.

SAP Review	218 Hours Phase I Final Cumulative Score
	365.5 Hours Phase II Midterm Cumulative Score
	462 Hours Phase II Final Cumulative Score

### **600 Clock-hour Program:**

Payment Period One 0-300 clock-hours

Payment Period Two 300-600 clock-hours

SAP Review	87 Hours Phase I Cumulative Score
	300 hours Phase II Midterm Cumulative Score

**\*\*The 600 clock-hour program is not currently eligible for Federal Financial Aid is therefore exempt from SAP policy.**

## **3.4 Payment Periods and Satisfactory Academic Progress**

Disbursements are made in two payment periods as follows, depending on when the student is awarded aid, or decides to receive their first payment:

**Phase I and II Disbursement Payment Periods:** The first disbursement is issued during Phase I, 30 days after the start date for the program for any student. The second disbursement is issued at the midpoint of the program, during Phase II, after satisfactory completion of 11 weeks of Instruction and 365.5 clock hours for the 731-hour Basic Program.  
Or

**Phase II and III Disbursement Payment Period:** For students who do not elect to start financial aid in Phase I, they may request financial aid starting in Phase II and will be eligible for the full amount of aid available for the whole program. In these cases, the first disbursement is issued after the start date of the Phase II, if the student has met all SAP requirements for the completion of Phase I. The second disbursement is issued at the midpoint of the program, during Phase II after successful completion of 11 weeks of Instruction and 365.5 clock hours for the 731-hour Basic Program. If a student elects to have their aid disburse during Phase III, both disbursement are issued after the start date of the Phase III, if the student has met all SAP requirements for the completion of Phases I and II. Disbursements are scheduled one to two days apart.

## **3.5 Maximum Time Framework**

Periods when a student does not receive Title IV aid are counted toward maximum time frame.

### **Pace/ Quantitative Standard**

In order to meet Satisfactory Academic Progress, students must be on pace to meet all SAP requirements for graduation by successfully completing no less than 2/3 or 67% of the total cumulative weeks/clock hours of instructional time attempted.

Pace/ Quantitative = Cumulative number of weeks/clock hours for each phase that you have successfully completed / Cumulative number of weeks/clock hours for each phase that you have attempted.

### **Progress Standard**

All program requirements must be completed within a maximum time frame of 150% times the normal program length as measured in the total number of calendar weeks and clock hours the student is in class. The Basic Rolfing Certification normal program length is 22 weeks or 731 clock hours and therefore, must be completed within the maximum time framework of 33 weeks or 1096.5 clock hours of class time; the Regional Basic Rolfing Certification normal program length is 18 weeks or 600 clock hours and therefore must be completed within the maximum time framework of 27 weeks or 900 clock hours of instructional class time.

So as not to exceed the maximum time framework for meeting the progress and pacing standards for program completion, no student shall be allowed to repeat more than one Phase in the total program; each repeated Phase is factored into the Maximum Time Framework allowable for completing the program.

Time spent on an approved Leave of Absence (LOA) or a scheduled break is not counted against the maximum time framework.

### **3.6 Repeat of Phases**

Students may be required to repeat up to one Phase of the program, if for any reason, they are placed on academic probation due to failing to meet Satisfactory Academic Progress. However, students may repeat no more than one Phase of the program.

The SAP calculations will be based off of the Qualitative cumulative score of all attempts. Students who repeat a Phase and are not on pace to meet Satisfactory Academic Progress at the point where they will complete a total of 67% (or 2/3) of maximum allowable hours, will be placed on financial aid suspension and administratively withdrawn. Students on financial aid suspension may not receive further financial aid.

Any student, who repeats a Phase, must re-enroll in the next appropriate and available Phase offered, or the student will be required formally to withdraw from the program. The student may be reinstated to the program if and only if he or she re-enrolls in the required Phase that needs to be repeated within no more than 180 days from the last day of attendance.

Students who withdraw from the program will receive a grade of 0% in each Phase interrupted by the withdrawal. Any interrupted Phase must be repeated upon reinstatement to the

institution. Regardless of the reason for a withdrawal, the sum of all attempted clock hours will count toward a student's allowable Maximum Time Framework.

### **3.7 Attendance Standard**

Due to the intensive and experiential nature of the Roling Certification Program, punctual attendance is required of all students. One unexcused absence requires a consultation with the instructor. Three unexcused absences may result in a student needing to repeat that phase. Note, no more than one phase may be repeated. Three unexcused tardies is the equivalent of one unexcused absence and will require a consultation with an instructor.

### **3.8 Academic Standard**

#### **Grading Scale/ Qualitative Standard**

The student's academic average is reviewed to determine qualitative progress. The minimum requirement to meet SAP is a C average (no less than 70%) at the end of each Phase and a cumulative C average (no less than 70%) for the program.

The Grading Scale is as follows:

#### **PASSING GRADES:**

90-100% = A

80-90% = B

70-80% = C

#### **NOT PASSING:**

60-70% = D

Below 60% = F

Grades are provided to students using the Learning Management System Gradebook.

#### **Incompletes**

Because of the difficulty of students completing work outside of class, or entering any phase after it has begun, no grade of "Incomplete" is issued for any phase of the Basic or Regional programs and therefore have no effect on SAP.

### **3.9 Leave of Absence**

In the event a student finds it necessary to be absent from school for an extended period, he/she may request an official Leave of Absence from the institution. Generally, only one Leave of Absence will be permitted per student request. The term of the Leave of Absence cannot exceed 90 days or three months, in addition to DIRI scheduled breaks.

There are two types of leave: Planned and Unplanned.

**Planned Leave of Absence:** Medical, Military, And Personal reasons.

**Unplanned Leaves:** Under extreme circumstances a leave of absence from an academic program may be granted for medical conditions, military deployments, or a national emergency.

Except in unusual cases involving unforeseen circumstances, a student's request for a leave of absence must be made in advance. Students may request official leaves of absence subject to the following US Department of Education limitations:

No more than 180 combined days of leaves of absence are permitted in a twelve-month period. No more than three months (90 days), in addition to scheduled break time, will be granted for an initial Leave of Absence to any student.

The twelve-month period referenced in these provisions starts on the first day of the first leave. A student's request for a leave of absence must be submitted in writing, must state the reason for which the leave of absence is being requested, and must be approved by the Director of Faculty & Student Services to be considered an official leave of absence.

The Rolf Institution will only approve leaves of absence in cases where there is a reasonable expectation that the student will return to the program as scheduled.

Students will not incur additional charges from the institution for any absences during an official leave of absence period.

Students who fail to return to school as scheduled from an official leave of absence will be considered to have withdrawn from the institution as of the date the student was expected to return to school.

The student's withdrawal date for refund calculation purposes will be the last date of attendance at the institution. If a student fails to return from an approved leave of absence, a portion or the entire student's grace period associated with any federal student loans may be forfeited resulting in the obligation to immediately begin loan repayment.

Students are not eligible for Title IV disbursements while on Leave of Absence.

### **3.10 Cohort Change Requests.**

At times, students may need to drop out of their current pipeline due to home or work commitments. If students should need to change one or more of their classes, they will be required to complete the Cohort Change Request Form.

Students must provide a detailed description of why they are requesting a change to their cohort. All requests are reviewed by the Education Department prior to approval and students are notified via email, mail, or phone of the outcome.

The cost is \$100 for each phase of training that is changed after an Enrollment Agreement has been signed. The fee may be waived at the discretion of the Director of Admissions.

If a change request is approved, students will need to complete a Leave of Absence (LOA) Request form through the Admissions Department. Per Department of Education Regulations, the maximum timeframe for an LOA is 180 days within a 12-month period and includes weekends and scheduled breaks.

Due to DIRI's mandatory scheduled breaks in between phases, students who change their cohort may be out of school for more than 180-days. If this is the case, students will need to be withdrawn and will be required to complete a reinstatement request prior to returning to school.

Students on Financial Aid who are withdrawn due to cohort changes may be required to pay a portion of their tuition out of pocket. If, after a Return of Title IV calculation is completed, it is determined that a portion of student's aid must be returned to the Department of Education the student will have an opportunity to discuss their options with the Financial Aid Department. Financial Aid Students will be required to complete Exit Counseling, Federal Loans may become due prior to them returning to school, and they will need to re-apply for Financial Aid when they return to DIRI to complete their program.

A new Enrollment Agreement is required anytime a class schedule is changed.

### **3.11 Transfer of Credits**

The Dr. Ida Rolf Institute accepts two types of transfer credits:

1. Credits transferred from another Roling International Organization.
2. Credits transferred from an approved professional certification program in manual therapy such as massage therapy or physical therapy.

#### **Transfer credits from a Roling SI International Program:**

DIRI accepts credits from other Roling SI International schools for one completed Phase one, two or three. For DIRI to issue a final certification, all phases of the DIRI Basic and Regional programs must be completed for certification through either the Dr. Ida Rolf Institute or one of its affiliated international schools.

**Please note** that only phases/programs offered by the Dr. Ida Rolf Institute in Boulder, CO are accredited. Students need to check with the specific state licensing agency where they intend to practice regarding accreditation standards and number of clock hours required for licensing. Also, please note that only students attending the school in Boulder for the entire training are eligible for Title IV financial aid. Per the U.S. Department of Education, financial aid only covers phases offered through accredited programs. Therefore, financial aid may NOT be transferred to a Roling SI International school.

#### **Transfer credits from a professional school:**

Completion of at least a 250-hour bodywork program may be transferred to the Roling Basic SI program. Students must have graduated from the professional program and hold a certification. Transfer students with professional certification may reduce the length of the Basic

Rolfing SI program Phase by four weeks. Students must submit an official transcript that shows the following:

- 47 hours of Anatomy, 21 hours of Physiology, 45 hours of Massage or other approved touch training, and 15 hours of Therapeutic Relationship.
- 50 documented hours of post-graduate massage practice experience or comparable clinical experience.

DIRI does not guarantee transferability of credits to another institution unless there is a written agreement with another institution. All components of the DIRI Basic and Regional programs must be completed for certification through the Rolf Institute or one of its affiliated international schools.

DIRI may only issue a COMTA “accredited” Certificate to students who have completed all credit hours within a U.S. DIRI program in Boulder, CO. Any student who transfers from a Rolfing International school will receive a “non-accredited” Certificate. Students who transfer from DIRI to any international school will need to formally “withdraw” from the U.S. DIRI program and be enrolled in the Rolfing International Program. Students with financial aid who withdraw from the DIRI program to enroll in a Rolfing International program will be responsible for any Title IV funds that are required to be returned or repaid based on the last date of attendance at the Rolf Institute.

The transferred hours will be counted towards the Pace/ Quantitative Standard (attempted and earned hours) but will have no bearing on the Grades/ Qualitative Standard.

### **3.12 Failure to make Satisfactory Academic Progress**

#### **Academic Learning Plan**

If a student fails to meet any of the quantitative or qualitative standards for Satisfactory Academic Progress, he or she will be placed on an Academic Learning Plan for the next evaluation period.

Students will be notified in writing when they are placed on an Academic Learning Plan. Students will meet with the Director of Faculty & Student Services and their Instructor and will receive attendance or academic counseling as appropriate when they are placed on a plan.

The written plan will outline which quantitative and/or qualitative SAP standard requirements that must be met. Written warnings may include a requirement that a student repeat a phase for which they fail to maintain a C average (70%), or in some cases complete a specific number of mentoring hours during a scheduled break. Any additional requirements such as repeat of a Phase or the student at their own expense will complete mentoring hours. Mentorship hours will not be counted towards the SAP calculation.

#### **Financial Aid Suspension Status**

Failure to achieve Satisfactory Academic Progress, including all progress, pacing and academic requirements stipulated in the Academic Plan, will result in student being placed on

Financial Aid Suspension and/or administrative withdraw. The institution will notify a student by certified mail if they are being administratively withdrawn for unsatisfactory academic progress.

A student on Financial Aid Suspension will not receive federal or institutional financial aid. A student who has been placed on Financial Aid Suspension may appeal this status and will need to complete the Appeal process to regain Financial Aid eligibility.

Hours completed by a student while on Financial Aid Suspension are still counted towards Maximum Time Frame.

### **Financial Aid Appeal Process**

The student may submit a written appeal of their Financial Aid Suspension or dismissal within five calendar days of their receipt of the notice. The appeal must be accompanied by documentation of the mitigating circumstances that have prevented the student from attaining satisfactory academic progress such as the death of a relative of the student, personal injury or illness of the student, social or psychological problems, learning disorders, or other circumstances that will be reviewed at the discretion of the Director of Faculty & Students Services. The student must also show evidence that changes have occurred to allow the student to now meet standards of satisfactory academic progress.

The Director of Faculty & Student Services will assess all appeals and determine whether the student may be permitted to continue in school on a probationary status, despite not meeting the satisfactory progress requirements or being administratively withdrawn from the program. The student will be sent the written decision within ten days of the institution's receipt of the appeal. The decision of the Administration, in collaboration with faculty, is final. Students who continue while on probationary status will have a written Learning/Academic plan that outlines the standards that must be met to be removed from probation and successfully complete the program.

If an appeal is denied, students will be administratively withdrawn and placed on an Academic Learning Plan that will outline steps required in order to return. Students will not be eligible for Title IV Aid during this time.

Once a student has completed the required steps outlined in the Academic Learning Plan, they will be allowed to reinstate at a later date, however any student who does not return after two years may be required to repeat the entire program.

One of the conditions of reinstatement may be the repeat of the current/last phase, however only one phase may be repeated. If students fail to meet satisfactory academic progress after the repeat of a phase, they will be administratively withdrawn and will have to wait at least one year before reenrolling.

### **Financial Aid Reinstatement and Probationary Status**

Students reinstated upon appeal are on a probationary status for the next evaluation period, during which time they must meet the terms and conditions set out in the Director of Faculty &

Student Services' letter granting the appeal. At the end of the evaluation period, and at the end of every evaluation period thereafter, the student's academic status will be reviewed.

The student may continue on probation if they meet the terms of the academic plan approved at the time the student's appeal was granted, until Satisfactory Academic Progress is regained. Any student reinstated after dismissal and appeal is not eligible for financial aid until he or she regains satisfactory progress status by meeting the minimum SAP standards, in addition to meeting all requirements for any financial aid loans previously issued.

### **Reinstatement**

If a student voluntarily withdraws or is administratively withdrawn from the program and wishes to return within two years, he/she will have to be reinstated to begin training again. If over one year calculated from the last day of attendance (LDA) has elapsed, the student's application for reinstatement will be reviewed by the Student Evaluation Committee (SEC) and the student may have to repeat all or some of the previously completed phases of training.

### **Terms and how SAP is impacted**

The Rolf Institute offers the Basic Rolfing Certificate Program two to three times per year. Each cohort consists of three courses: Phase I which is six-weeks long, Phase II which is eight-weeks long, and Phase III which is eight-weeks long. There is a scheduled break of two to three weeks in between each phase. The SAP calculation scheduled is the same for each cohort: at the end of Phase I, at the midpoint of the program (365.5 successfully completed hours and 11 completed weeks), and at the end of Phase II.

Students who transfer hours into the Basic Rolfing Program will reduce the program length by four-weeks. They will follow the same SAP calculation schedule.

The transferred hours will be counted towards the Pace/ Quantitative Standard (attempted and earned hours) but will have no bearing on the Grades/ Qualitative Standard.

### **Noncredit remedial courses**

The Rolf Institute does not offer noncredit remedial courses. Mentorship and classes taken outside of the institute are not counted towards SAP but may be counted as Continuing Education.

## Section 4: Institutional Eligibility

### 4.1 General Requirements for Institutional Eligibility

(See 34 CFR 600.4(a)(3) & (5); 34 CFR 600.5(a)(4) & (6); 34CFR 600.6(a) (3) & (5))

The regulations governing institutional eligibility define three types of eligible institutions – institutions of higher education, proprietary institutions of higher education, and postsecondary vocational institutions. Under the three definitions, a school is eligible to participate in all the FSA programs provided the school offers the appropriate type of eligible program. The Rolf Institution of Structural Integration educational program is eligible as a nonprofit, private, postsecondary vocational institution approved under the state of Colorado. The Rolf Institute is defined as a nonprofit institution as a school that is legally authorized to operate as a nonprofit organization by the state of California (where DIRI is incorporated) and Colorado (where DIRI is located) and as determined by the Internal Revenue Service (IRS) to be eligible for tax deductible contributions in accordance with the IRS Code (26) U.S.C. 501c(3).

As a postsecondary vocational school, DIRI must offer a program that provides training for gainful employment in a recognized occupation and must meet specific criteria regarding the amount of instructional time offered, i.e., provides at least a 15 week (instructional time) undergraduate program of 60 clock-hours, 16 semester or trimester hours, or 24 quarter hours. It may admit students without an associate degree or equivalent. Additionally, as a postsecondary vocational institution, DIRI must legally be authorized to give (and continuously has been giving) the same postsecondary instruction for at least two consecutive years.

To be eligible, an institution must adhere to the following requirements:

- It must be legally authorized by the state where the institution offers postsecondary education to provide a postsecondary education program.
- It must be accredited by a nationally recognized accrediting agency or have met the alternative requirements, if applicable, and
- It must admit, as a regular student, only individuals with a high school diploma, or its recognized equivalent, or individuals beyond the age of compulsory school attendance in the state where the institution is located.

*"In accordance with the provisions made available to us by the USDE, we are electing to immediately implement the regulations published on 7/1/2019 regarding the rescission of the gainful employment rule." -Accepted by the DIRI Board of Directors 9/18/2019, by consent.*

### 4.2 State Authorization

**State Licensure by the Colorado Division of Private Occupational Schools (DOPOS)** The Dr. Ida Rolf Institute is an approved private, nonprofit school authorized and licensed by the Colorado Division of Private Occupational Schools (DOPOS), an agency within the Colorado Department of Higher Education. The Private Occupational School Board, under the Colorado Department of Higher Education requires schools to operate under the Rules and Regulations

as stated in the Private Occupational Education Act of 1981, Colorado Revised Statutes, Article 59 of Title 12 (“The Act”).

### 4.3 Accreditation

#### **Accreditation by the Commission on Massage Therapy Accreditation (COMTA)**

Only the Basic Rolfing Certification Program (731 clock-hours) is accredited through *the Commission on Massage Therapy Accreditation* (COMTA). As of January 2017, the Regional Basic Rolfing Certification Program (600 clock-hours) is no longer be accredited, but rather is offered in unaccredited regional workshops. For a student to graduate with accredited certification in Rolfing Structural Integration, the student must complete the entire program of three phases and must attend classes at the Rolf Institute in Boulder, CO. International and decentralized school programs offered through the Regional International Organizations and the Rolf Institution of Structural Integration are not accredited by COMTA.

### 4.4 Title IV Program Participation Agreement

The Rolf Institute was approved by the U.S. Department of Education in 2010, and renewed in 2013 until December **2016**, to offer Federal Title IV, HEA Program funding. The institution was found eligible and approved to participate in the following Title IV, HEA programs:

- Federal Pell Grant Program, 20 U.S.C. 1070 et seq.; 34 C.F.R. Part 690
- Federal Direct Student Loan Program, 20 U.S.C. 1087a et seq.; 34 C.F.R. Part 685
- Federal Supplemental Educational Opportunity Grant Program, 20 U.S.C. 1070b et seq.; 34 C.F.R. Part 676
- Iraq and Afghanistan Service Grant, 20 U.S. Code 1070 d et seq.

#### **Gramm-Leach-Bliley Act Compliance**

The Gramm-Leach-Bliley Act (GLBA), which was signed into law on November 12, 1999, created a requirement that financial institutions must have certain information privacy protections and safeguards in place. The Federal Trade Commission (FTC) has enforcement authority for the requirements and has determined that institutions of higher education (institutions) are financial institutions under GLBA.

DIRI has agreed to comply with GLBA in its Program Participation Agreement with the Department. In addition, as a condition of accessing the Department’s systems, DIRI has signed the Student Aid Internet Gateway (SAIG) Enrollment Agreement, which states that the institution must ensure that all federal student aid applicant information is protected from access by or disclosure to unauthorized personnel.

DIRI is required to demonstrate administrative capability in accordance with 34 C.F.R. § 668.16, including the maintenance of adequate checks and balances in their systems of internal control. Upon termination of the Third-Party Servicer contract with Gemcor, DIRI has redistributed duties to ensure compliance with this regulation, understanding that an institution that does not maintain adequate internal controls over the security of student information may not be considered administratively capable.

## **Access Control**

Access to student information stored within USDE managed web sites requires unique FSA User Accounts and two-factor authentication. All Financial Aid employees maintain FSA User Accounts that shall be created by the Director of Financial Aid/ SAIG primary destination point administrator. The sharing of user IDs and/or passwords of any account used to access protected information is strictly prohibited and will result in disciplinary action which may include termination of employment.

Access to Financial Aid Systems is limited only to those who package Financial Aid, and the designated employees are required to only remain logged into systems containing protected information during the time they are at their computer and actively accessing such systems. The display of any personal information on computer monitors is to be minimized whenever possible. Should the need arise for an employee to leave their immediate work area, even temporarily, he/she must logout of all active sessions.

Protected data may not be removed from the premises, physically or electronically, for any reason other than as required by job responsibilities.

In the event any GEMCOR employee is no longer employed by the company or has been determined to no longer require access to protected information for the performance of his/her job responsibilities, GEMCOR management will immediately terminate the employee's user account(s).

Access to protected information stored in hard copy format within the offices of GEMCOR is restricted from unauthorized individuals. All hard copy documents containing PII are stored in restricted areas. Access by unauthorized individuals is not permitted without escort by an authorized GEMCOR employee whereby activity will be continually monitored. Access to any area within GEMCOR is protected by ADT Security's 24-hour monitoring service.

Periodically, hard copy data maintained by GEMCOR is permanently disposed of through the employment of a licensed document destruction service.

## **Updating PPA Application Information**

The Financial Aid Office will notify the Department of Education of any changes that take place at Rolf Institute regarding the Program Participation Agreement and the Eligibility and Certification Approval Report (ECAR). The changes that will be reported include, but are not limited to, additional programs and changes to the Executive Director, Chief Financial Officer and Director of Financial Aid.

## **Disqualified individuals and the PPA**

In its PPA, the institution agrees to not knowingly employ, in a capacity involving the administration of FSA funds, anyone who has pled *nolo contendere*, or guilty, or has been administratively or judicially determined to have committed fraud or any other material violation of the law involving federal, state, or local government funds. (See 34 CFR 668.14 (b) (18) (i).)

## **Additional Institutional Eligibility Factors**

An otherwise eligible institution becomes an ineligible institution if the school violates, among other requirements,

- the correspondence course limitation or the correspondence student limitation (more than 50% of courses are correspondence)
- the incarcerated student limitation (more than 25% of students), or
- the 50% limit on students without a high school diploma or equivalent (more than 50%).

For each of the limitation's requirements, the school must notify the Department (via Section G of the E-APP for the PPA) of the school's failure to meet a requirement, its falling within a prohibited limitation, or its ineligibility for a continued waiver as application. The school's notification must occur by July 31 following the end of an award year.

If the Institute becomes ineligible because it files for bankruptcy, or if the school, its owner, or its CEO is responsible for a crime involving FSA program funds, the school must notify the Department of the change within 10 days. Additionally, the Institute must send notice of its failure to satisfy the 90/10 Rule (Sec. 102 of the HEA; 34 CFR 600.5) to the Department by U.S. Mail to the following Address:

U.S. Department of Education  
 School Eligibility Channel  
 Data Management and Analysis Division  
 Document Receipt and Control Center  
 830 First Street, NE Room 71-1-1  
 Washington, DC 20002  
 Phone (202) 377-3161 or (202) 377-3155

## **4.5 Cohort Default Rates**

The Cohort Default rate for The Dr. Ida Rolf Institute is the percentage of the federal student loan borrowers who enter repayment within the cohort fiscal year divided by those who default within the cohort default period. The Federal Government will provide yearly the cohort default rates for the school.

The Rolf Institute will make every effort to keep the default rate under 20%. If the default rate should be greater than 25% for three consecutive years, the school will lose Federal Stafford Loans and Federal Pell Grant eligibility. The school may appeal the decision of the Department of Education.

Schools participating in the Federal Stafford Loan Program for the first time, or schools that have had a change of ownership that resulted in a change in control, are required to use a default prevention and management plan to participate in the Title IV programs. While neither of these directly applies to DIRI, the Institute utilizes the following eight default prevention and management strategies:

1. Entrance Counseling: Requires first-time borrowers to have explanations of how the Master Promissory Note works, that the loan must be repaid, the consequences of

default and be shown sample monthly repayment amounts. The school will collect as much contact information as possible to facilitate future contact if needed.

2. Financial Literacy for Borrowers: The school will offer the student written information on their loans, how to manage debt, etc. The following will be provided at entrance and exit interviews:
  - a) Estimate of required monthly payments on loan balance
  - b) Calculations to help estimate and manage debt
  - c) Loan servicer contact information
  - d) Contact information for delinquency and default prevention assistance on campus
  - e) Introduction to NSLDS for students
  - f) "Repaying Your Student Loans" publication
3. Communication throughout the campus: The school will review its communication among departments determine a student's academic progress, attendance, enrollment status, etc. The Director of Financial Aid will ensure all departments are involved.
4. Exit Counseling: The school will comply with Federal Regulations and hold exit interviews. Explanation of payment plans and choices that fit the borrowers' needs is essential. The exit interview will attempt to clear up any misconceptions that the student may have regarding the loan. Students who withdraw, rather than graduate, must also complete exit interviews. These students have the highest risk of default and every effort must be made to reach these students.
5. Timely and Accurate Enrollment Reporting: Completing NSLDS Enrollment Reporting accurately and completely on current students and returning the error report to ECM within the time allotted is most important. This will ensure the student data is accurate, and that end dates are correct for exit interviews.
6. NSLDS Date Entered Repayment Report: The Enrollment Report also contains students who have left school. This assures that student status is correct and that students enter the correct cohort year and that schools receive accurate cohort default rates.
7. Late Stage Delinquency Assistance: When notified that students are more than 240, but less than 361, days delinquent the school will make every effort to contact these students and inform them of their delinquency.
8. Analyze Defaulted Loan Data to Identify Defaulter Characteristics: The Rolf Institute collects information to discern who is defaulting and why. DIRI uses this information to improve its default prevention.

#### **4.6 Admission Policy for Private Nonprofit Educational Institution: Postsecondary**

(See [34 CFR 600.6\(a\)\(1\)\(2\)](#))

##### **Vocational Institution**

An eligible institution may admit, as regular students, only persons who have a high school diploma, or its recognized equivalent, or persons who are beyond the age of compulsory school attendance in the state in which the school is located.

## High school diploma

The DIRI Admissions Office is required to keep a copy of a student's high school diploma or GED (the recognized equivalent of a high school diploma).

## Recognized equivalent of a high school diploma

Generally, a recognized equivalent of a high school diploma is either a GED or a state certificate (received after the student has passed a state-authorized test) that the state recognizes as being equivalent to a high school diploma. However, the Department of Education recognizes that there are special cases:

- If a student has successfully completed at least a two-year program that is acceptable for full credit toward a bachelor's degree, the student's academic transcript is considered equivalent to a high school diploma.
- A student without a high school diploma who is seeking enrollment in a program of at least the associate degree level and who has excelled academically in high school and met formalized written admissions policies of the school is also considered to have the equivalent of a high school diploma.

## Criteria for Ability-to-Benefit

(See FSA HB May 2018)

To receive FSA funds, a student must be qualified to study at the postsecondary level. A student qualifies if she:

- has a high school diploma (this can be from a foreign school if it is equivalent to a U.S. high school diploma);
- has the recognized equivalent of a high school diploma, such as a general educational development (GED) certificate or another state-sanctioned test or diploma-equivalency certificate;
- has completed homeschooling at the secondary level as defined by state law;
- has completed secondary school education in a homeschool setting which qualifies for an exemption from compulsory attendance requirements under state law, if state law does not require a homeschooled student to receive a credential for their education; or
- has completed one of the ability-to-benefit (ATB) alternatives and is either currently enrolled in an eligible career pathway program or first enrolled in an eligible postsecondary program *prior to July 1, 2012*.

A student may self-certify on the FAFSA that he has received a high school diploma or high school equivalency certificate or that he has completed secondary school through homeschooling as defined by state law. If a student indicates that he has a diploma or high school equivalency certificate, your school isn't required to ask for a copy (except as noted below), but if your school requires a diploma for admission, then you must rely on that copy of the diploma or high school equivalency certificate and not on the student's certification alone.

Awards submitted to the COD system for all students require a Student Eligibility Code (previously Ability to Benefit Code) to report how the student (including graduate and professional students) is qualified to study at the postsecondary level (e.g. by obtaining a high school diploma or its recognized equivalent). For more detail on submitting the appropriate Student Eligibility Code, see the COD Technical Reference on IFAP.

## Section 5: Federal, State, and Accrediting Agency Student Consumer Information Requirements

### 5.1 Federal Student Consumer Information Requirements

#### Notice to Enrolled Students

Each year the Institute will provide, to enrolled students, a list of the information that must be disseminated under the Higher Education Act of 1965, as amended, and the Family Education Rights and Privacy Act (FERPA) and the procedures for obtaining the information. DIRI will provide this notice through a one-on-one distribution. For this requirement, a general announcement whether in writing or electronically is not sufficient.

#### Those disclosure requirements include:

The [Clery \(Campus Security\) Act](#), Annual Security Report, Institutional Security Policies and Crime Statistics;

The Student Right-to-Know Act, information on Graduation, Completion, and Transfer-Out Rates (rates on Athletes is non-applicable at DIRI);

Schools that participate in the campus-based program must also comply with disclosure requirements for drug and alcohol abuse prevention. Although some of these disclosure requirements contain common elements, each disclosure is required separately.

Note: In addition to limiting, suspending, or terminating the participation of any school that fails to comply with the consumer information requirements, the Department may impose civil fines of up to \$27,500 for each violation (See [20 U.S.C. section 1094\(c\)\(3\)\(B\)](#)).

#### Financial Aid Information

(See [34 CFR 668.42](#))

At minimum, the following information must be provided about financial assistance available at the Institute:

- The need-based and non-need-based federal financial aid that is available to students;
- The need-based and non-need-based state and local aid programs, school aid programs, and other private aid programs that are available;
- How students apply for aid and how eligibility is determined;
- How the school distributes aid among students;
- The rights and responsibilities of students receiving aid;
- How and when financial aid will be disbursed;
- The terms and conditions of any employment that is part of the financial aid package;
- The terms of, the schedules for, and the necessity of loan repayment and required loan exit counseling; and
- The criteria of measuring satisfactory academic progress and how a student, who has failed to maintain satisfactory progress, may establish for federal financial aid.

## 5.2 Institutional Information

(See [34 CFR 668.43](#))

The Institute must provide the following minimum information about itself:

- The names of associations, agencies, and/or governmental bodies that accredit, approve, or license the school and its programs; and the procedures by which a student may receive a copy for review of the school's accreditation, licensure, or approval;
- Special facilities and services available to disabled students;
- The costs of attending the school (tuition and fees, books and supplies, room and board, and applicable transportation costs, such as commuting) and any additional costs of the program in which the student is enrolled or has expressed an interest;
- The degree programs, training, and other education offered;
- The instructional, laboratory, and other physical plant facilities associated with the academic programs;
- A list of the faculty and other instructional personnel, whom to contact for information on student financial assistance, and whom for general institutional issues;
- That a student may be eligible for FSA program funds for attending a study-abroad program that is approved for credit by the home school;
- The terms and conditions under which students receiving federal education loans may obtain deferments while serving (a) in the Peace Corps, (b) under the Domestic Volunteer Service Act, and (c) as a volunteer for a tax-exempt organization of demonstrated effectiveness in the field of community services; and
- Information regarding the availability of FSA program funds for study abroad programs.

The Institute's Director of Faculty & Student Services will be available during normal operating hours to help persons obtain consumer information.

## 5.3 Completion of Graduation Rate

(See [34 CFR 668.45](#))

Student Right-to-Know disclosures must be published by July 1 of each year and requires that the institute disclose completion or graduation rates, and if applicable transfer-out rates, for a specific cohort of the general student body. This cohort is of certificate, full-time, and first-time undergraduate students. The institute must make available the rates for the cohort for which the 150% of the normal time for completion elapsed.

To calculate completion or graduation and transfer-out rates, a school must identify a group of students each year (a cohort) and review the performance of that cohort over time to determine the percentage of those students who complete their programs or transfer out of the school. A school's cohort is based on the programs the school offers (see 34 CFR 668.45).

A school, such as DIRI, that does not offer most of its programs based on standard terms must count all first-time students who are certificate, full-time students who enter the school between September 1 of one year and August 31 of the following year. For programs less than or equal

to one academic year in length, schools should include, in the cohort, only students who are enrolled for at least 25 days.

The requirements for disclosing this information are to be broken down into four steps: (1) determining the cohort, (2) calculating the rates, (3) disclosing the rates, and (4) reporting the rates to the Department via the Graduation Rate Survey.

### **Step 1: Determining the Cohort**

The Director of Financial Aid will determine the cohort based on the description above.

### **Step 2: Calculating the Rates**

Once the Director of Financial Aid has identified a cohort, he/she will determine how many of those students graduated or completed their program and, if applicable, how many withdrew when 150% of the normal time for completion of each program has elapsed for all the students in the cohort.

The following formula is used to calculate a completion rate for the general student body cohort: Number of students in cohort who completed their program within 150% of normal time for completion divided by Number of students in cohort.

#### **Normal Time:**

Normal time is the amount of time necessary for a student to complete all requirements for a certificate, i.e., 731 or 600 hours for the Basic or Regional programs.

### **Step 3: Disclosing the Rates**

This information on completion, graduation rates must be disclosed by 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 of which the school bases its completion calculations. The report must be completed and submitted to the Department by the GRS deadline. DIRI will disseminate the information on completion or graduation to any prospective students upon request, through appropriate publications, mailings, or electronic media (for example, school catalog or admissions literature).

## **5.4 Drug and Alcohol Abuse Prevention Information**

(See [34 CFR 668.14\(c\)](#))

As a campus-based program, DIRI must provide information under the Drug-Free Workplace Act of 1988 (Public Law 101-690), including notice to its employees of unlawful activities and the actions the school will take against an employee who violates these prohibitions. In addition, the Drug-Free Schools and Communities Act (Public Law 101-226) requires a school that participates in any FSA program to provide information to its students, faculty, and employees to prevent drug and alcohol abuse.

### **Information to be included in drug prevention materials:**

- Information on preventing drug and alcohol abuse;

- Standards of conduct that clearly prohibit at a minimum the unlawful possession use, or distribution of drugs and alcohol by students and employees on the school's property, or as part of the school's activities;
- A description of the sanctions under local, state, and federal law for unlawful possession, use, or distribution of illicit drugs and alcohol
- A description of any drug and alcohol counseling, treatment or rehabilitation programs available to students and employees;
- A description of the health risks associated with the use of illicit drugs and alcohol; and
- A clear statement that the school will impose sanctions on students and employees for violations of the standards of conduct (consistent with local state, and federal law) and a description of these sanctions up to and including expulsion, termination of employment and referral for prosecution

DIRI will include this information in the employee handbook, student catalog, policy manual, and on the website.

## **5.5 Misrepresentation**

(See [34 CFR Subpart F](#); [34 CFR 668.71](#))

DIRI employees shall not misrepresent or make any false, erroneous, or misleading statements to a student or prospective students, or to the family of an enrolled or prospective student, or to the Department. This includes disseminating testimonials and endorsements given under duress. Misrepresentation of the educational program includes, among other things, false or misleading statements about the school's accreditation or the school's size, location, facilities, or equipment. Misrepresentation of financial charges include, among other things, false or misleading statements about scholarships provided for paying school charges. To be considered a scholarship, a grant must be used to reduce tuition charges made known to the student before the scholarship was offered to the student. (The tuition charges must be charges that are applied to all students whether or not they are receiving a scholarship.) It is also considered misrepresentation if the school gives false or misleading information as to whether a charge is customary charge for that course at the school. Misrepresentation includes making any false or misleading statements about the employability of the school's graduates.

## **5.6 Campus Security Report**

(See Sec. 485(f); [34 CFR 668.46](#))

The Department of Education is strongly committed to enforcing the provisions of the Campus Security Act of 1990 requiring a school to compile an annual campus security report. By October 1 of each year, a school must publish and distribute its annual campus security report. It must be distributed to all enrolled students and current employees directly by publications and mailings, including direct mailing to everyone through the U.S. Postal Service, campus mail, or electronic mail. If DIRI chooses to fulfill this requirement by posting the crime report on the DIRI website, an individual notice must be distributed to each student and current employee that includes, a statement of the report's availability; a list and brief description of the information contained in the report; the exact electronic address (URL) of the website at which the report is posted and a statement saying the school will provide a paper copy upon request.

Upon request, DIRI will provide its annual campus security report to a prospective student or prospective employee.

DIRI will also submit the statistical section of the Annual Crime Report to the Department on an annual basis. Survey data is collected through the Department's Campus Crime and Security Website: [surveys.ope.ed.gov/security](https://surveys.ope.ed.gov/security).

## **5.7 Timely Warnings and Emergency Notifications**

(See [34 CFR 668.46](#)(e))

In addition to the required annual campus security report, DIRI is required to provide timely warning to the campus community of any occurrences of the following crimes that are reported to campus security authorities or local police agencies and are considered to represent a threat to students and employees, including:

- Criminal homicide including, (a) murder and non-negligent manslaughter, and (b) negligent manslaughter;
- Forcible and non-forcible sex offenses;
- Robbery;
- Aggravated assault;
- Burglary;
- Motor vehicle theft;
- Arson;
- Separately by category of prejudice, each crime listed above and any other crime involving bodily injury reported to local police agencies or to campus security that shows evidence of prejudice base on race, gender, religion, sexual orientation, ethnicity or disability; and
- Arrests for violations of liquor, drug, and weapons law violations.

## **Campus Crime Log**

(See [34 CFR 668.46](#)(f))

DIRI does not maintain a campus police or security department and therefore does not maintain daily logs of any crimes reported.

## **5.8 FERPA Disclosure**

(See [34 CFR 99.31](#)(a) (13) and (14))

The provisions of the Family Educational Rights and Privacy Act (FERPA) do not prohibit DIRI from complying with campus security regulations. FERPA does not prohibit the disclosure of statistical, non-personally identifiable information. Records created and maintained for purposes of campus law enforcement are not education records and may be disclosed without a student's consent. In contrast, records of a disciplinary action or proceeding are considered education records of a student and cannot be available to the public without the consent of the student. FERPA does allow a postsecondary institution to disclose the results of disciplinary proceedings under the following circumstances:

- To anyone, if the violation was a crime of violence or a non-forcible sexual offence, and the institution concludes that a violation of the institution's rules or policies did occur;
- To a victim of a crime of violence or a non-forcible sexual offence, when the proceedings were regarding that crime, the institution might disclose the results of the proceedings, regardless of whether the institution concluded that a violation was committed.

The provisions of the Family Educational Rights and Privacy Act (FERPA) do not prohibit DIRI

## 5.9 Gainful Employment

*"In accordance with the provisions made available to us by the USDE, we are electing to immediately implement the regulations published on 7/1/2019 regarding the rescission of the gainful employment rule."* -Accepted by the DIRI Board of Directors 9/18/2019, by consent.

Posted Date: September 13, 2019

Author: Federal Student Aid

Subject: Gainful Employment Electronic Announcement #123 – Gainful Employment Reporting for 2018–19

On July 1, 2019, the Department of Education published a final rule rescinding the Department's gainful employment (GE) regulations (2014 Rule) in the Federal Register. Institutions were given the option to early implement the rescission of the GE rule. As detailed in [Gainful Employment Electronic Announcement #122](#), institutions that choose to early implement the rescission of the GE rule will not be required to report GE data for the 2018–19 Award Year to the National Student Loan Data System (NSLDS®), which is otherwise due on October 1, 2019.

Institutions that do not early implement the rule are still expected to comply with the 2014 rule until the rescission becomes effective on July 1, 2020 and are expected to report GE data for the 2018–19 Award Year to NSLDS by October 1, 2019. Institutions may continue to submit the information using the GE online reporting option under the Enrollment tab of the [NSLDS Professional Access](#) website, the GE batch file submission option through the Student Aid Internet Gateway (SAIG), or by using the NSLDS Gainful Employment Spreadsheet Submittal Format online upload option.

Detailed information about the use of NSLDS for reporting GE data is provided in the [NSLDS Gainful Employment User Guide](#), available on the NSLDS User Documentation page of the Information for Financial Aid Professionals (IFAP) website, as well as from the ["Resources" section of the Gainful Employment Information Page](#).

### **Contact Information**

If you have questions about using NSLDS to report GE information, contact the NSLDS Customer Support Center at 1-800-999-8219. You can also contact Customer Support by email at [nslds@ed.gov](mailto:nslds@ed.gov).

The [Gainful Employment Information Page](#) on the IFAP website contains publications and resources on GE. If you have a policy question about the GE Regulations that has not already been addressed, please submit the question to [ge-questions@ed.gov](mailto:ge-questions@ed.gov).

Posted Date: June 28, 2019

Author: Office of Postsecondary Education

Subject: Gainful Employment Electronic Announcement #122 – Early Implementation of the Rescission of the Gainful Employment Rule

On July 1, 2019, the Department of Education will publish a final rule rescinding the Department's gainful employment (GE) regulations (2014 Rule) in the Federal Register. In this electronic announcement, we provide guidance to institutions on what the rescission means and what institutions can do should they choose early implementation.

Section 482 (c) of the Higher Education Act of 1965, as amended, requires that regulations affecting programs under Title IV of the HEA be published in final form by November 1, prior to the start of the award year (July 1) to which they become effective. This section also permits the Secretary to designate any regulation as one that an entity subject to the regulations may choose to implement earlier, as well as conditions for early implementation. For this rescission, the Secretary is exercising her authority under section 482 (c) of the HEA to designate the regulatory changes to subpart Q and subpart R of the Student Assistance General Provisions at Title 34 part 668 of the Code of Federal Regulations for early implementation.

An institution that early implements the rescission must document its early implementation internally. It does not have to publish its decision to do so; however, it must make such documentation available upon request by the Department. Institutions that do not early implement the rule are expected to comply with the 2014 rule until the rescission becomes effective on July 1, 2020.

Institutions that early implement the rescission of the GE rule will not be required to report GE data for the 2018-2019 award year to NSLDS, which will be due October 1, 2019. Additionally, those institutions that early implement will not be required to comply with the current requirements in 34 CFR 668.412 (d) and (e) that require institutions to include the disclosure template, or a link thereto, in their GE program promotional materials and directly distribute the disclosure template to prospective students, which will be required starting on July 1, 2019. Institutions that early implement will no longer be required to post the GE Disclosure Template and may remove the template and any other GE disclosures that are required under 34 CFR 668.412 from their web pages. Finally, an institution that early implements will not be required to comply with the certification requirements for GE programs under 34 CFR 668.414.

## Section 6: General Provisions

### 6.1 Academic Year

The Academic Year at DIRI is defined as non-standard year-long program of 731 clock-hours (less than 900 hours). Students have a maximum time framework of 33 weeks/1096.50 total clock-hours to complete the 22-week program.

The DIRI Federal Student Aid Award Year is defined as is January 1 to December 31<sup>st</sup> and includes two payment periods within the 731 clock-hour program.

### 6.2 Schedule of Normal Program Schedule

#### Scheduled Breaks

(See [34 CFR 600.4\(a\)\(2\)](#); [34 CFR 600.5\(a\)\(2\)](#); [34 CFR 600.6\(a\)\(2\)](#))

Both the Basic and Regional programs require that students enter the program in Phase I after having gone through a complete Ten-Series of Rolfing SI. Additionally, the programs require that students both practice Rolfing Structural Integration on each other during the Phase II and on a client during Phase III. Because of the intense nature of the work and the need for the student to somatically integrate and embody the work they have received, as well as the need to complete practice study and application with a mentor, each phase of the program is followed by a three (3) week scheduled break. By the end of Phase II, Basic students, not in the Regional program, are required to complete 50 hours of *Skillful Touch*, receive three Rolf Movement sessions with a Certified Rolf Movement Practitioner, and write two papers. Between Phases II and III students are required to complete their business plans and to practice the Ten-Series with at minimum one client.

#### Clock-Hour Program

A program of at least one academic year in duration that leads to a certificate or other nondegree recognized credential and prepares students for gainful employment in a recognized occupation must undergo clock-hour conversion, as prescribed by federal law ([34 CFR 668.8](#)). The Rolf Institute has one program of study that requires clock-hour conversion to be eligible for federal student aid. The Basic program is a certificate program that requires clock-hour conversion. Currently, the clock-hour conversion formula provided by the Department of Education is as follows:

#### Title IV Clock-hour Conversion

(Course/Title of Course Credit Hrs Contact Hrs) X (Semester Weeks 37.5) = Clock Hrs  
(A) (B) (C) Multiply B X C Divided by 37 Equals D (clock-hours for Financial Aid) (D)

After clock-hour conversion is completed on a student's course load, the number of clock hours is used to determine the financial aid enrollment status. Completing this process may affect a

student's financial aid award. Clock-hour conversion must be completed for all programs/phases under an approved program of study that offers certificates.

### **6.3 Determination of Leave of Absence (see section 3.9)**

### **6.4 Certification of Attendance**

(See [34 CFR 668.13](#))

The Rolf Institute verifies attendance for enrolled students weekly. The Financial Aid Office is responsible for this information.

One unexcused absence requires a consultation with the instructor. Three unexcused absences may result in a student needing to repeat that phase. Note, no more than one phase may be repeated. Three unexcused tardies is the equivalent of one unexcused absence and will require a consultation with an instructor.

### **6.5 Rights and Responsibilities of Students on Financial Aid**

As a recipient of financial aid, there are certain rights and responsibilities of which students should be aware. These rights and responsibilities of students on financial aid are listed in the following documents:

1. The DIRI Education Catalog
2. The DIRI website at [www.rolf.org](http://www.rolf.org)

Students have the right to know the:

1. Financial aid programs available
2. Alternative funding options available
3. Application process which must be followed to be considered for aid
4. Criteria used to select recipients and calculate need
5. DIRI refund policy and repayment policy
6. Financial Aid Office policies surrounding satisfactory academic progress
7. Special facilities and services available for the handicapped

Students are responsible for:

1. Completing all forms accurately and by the published deadlines
2. Submitting information requested by financial aid office staff in a timely manner
3. Keeping the financial office informed of any changes in address, name, marital status, financial situation or change in student status
4. Notifying the financial aid office of a change in enrollment status
5. Maintaining satisfactory academic progress

## 6.6 Financial Aid Counseling

The Financial Aid Office provides information to students concerning their rights and responsibilities in the Rolf Institute Education Catalog and through mailings to the student. The Financial Aid Office is available to meet with the student during posted business hours.

### Entrance and Exit Requirements

Borrowing a loan is a commitment that students must fully understand. For funds to be disbursed students must first complete certain entrance requirements that show they have reviewed their obligations as a loan borrower.

### Federal Stafford Loans

Students who wish to borrow Federal Direct Stafford Loans are required to complete a onetime Entrance Counseling session and Master Promissory Note (MPN) online at [www.studentaid.gov](http://www.studentaid.gov). Each student is given instruction on how to complete the online Entrance Counseling sessions as follows:

For these funds to be applied to your tuition bill, you must complete the following steps:

### Annual Student Loan Acknowledgment

Effective with the 2021-2022 (July 1, 2021) award year, students and parents (for PLUS loans) will be required to complete a process called Annual Student Loan Acknowledgment, previously referred to as Informed Borrowing Confirmation (IBC).

The process will require interested borrowers to login to their account at [www.studentaid.gov](http://www.studentaid.gov), review their current outstanding loans, and confirm that they wish to have additional loans for the award year.

This will be an annual requirement necessary for each award year beginning with the 2020-2021 award year which will begin on July 1, 2020. This new process is the result of the USDE attempting to control the growing student debt problem by requiring that borrowers review and acknowledge their desire for additional loans.

### Direct Loan Entrance Counseling

The Direct Loan Entrance Counseling session will explain rights and responsibilities as a borrower. Students should understand the importance of borrowing loan funds before completing their promissory note. They can complete the Entrance Counseling session by going to the Direct Loan webpage at <http://www.studentaid.gov/>.

- Under Complete Aid Process, choose Complete Entrance Counseling.
- Click Login.
- Enter FSA username and password (same as FAFSA).
- Click Start on the left.
- Add Rolf Institute of Structural Integration (The) on the left, choose "I am completing entrance counseling to receive Direct Loans as an undergraduate student.", and then click Continue.

- Click the plus (+) icon to the right of both the Subsidized and Unsubsidized Loans to add loan amounts (typically \$2,843 Subsidized, \$4,873 Unsubsidized). Any previous loans will already show up on this screen.
- On Tab 2 (Manage Your Spending) input any Funds anticipated to be received while in school.
- Under Expenses, input the information from the Award Letter. Include any other (monthly) expenses on the left.
- Read the information and complete the questions throughout each page. Once completed, print a copy for your records.

### **Direct Loan Stafford Master Promissory Note (MPN)**

The electronic Master Promissory Note (MPN) is the official document that allows you to borrow a Direct Stafford Loan. By completing it, you agree to your rights and responsibilities as a borrower and consent to Direct Loan funds being transmitted to your Merrimack College student account. You will only need to complete your MPN once during your enrollment at Merrimack College. Your loan will automatically be renewed each year. You may complete the session by going to the Direct Loan webpage at <http://www.studentaid.gov/>.

- Hover over Complete Aid Process (at the top of the screen).
- Click Subsidized/Unsubsidized Loan MPN
- Login if revisiting the page
- Enter FSA username and password (same as FAFSA).
- Click Start on the left.
- Verify/ Update personal information including Driver's License State and Number, Address, Phone Number, and Email Address.
- Under **School Information**, select Colorado for School State, then ROLF INSTITUTE OF STRUCTURAL INTEGRATION (THE) as the School Name. Click "Notify This School".
- Click "Continue".
- Enter the full name, address and telephone number for two (2) references who do not live with you and do not live with each other. They should be references who you have known for at least three (3) years.
- Click "Continue".
- Verify both Borrower and Reference Information and click "Continue".
- Read the disclosures presented.
- Check the box at the bottom and type your First Name, Middle Initial (if applicable), and Last Name and click "Sign and Submit".
- Click to View, save and/or print a copy of your completed MPN for your records.

### **Please keep the following in mind:**

While students are not required to complete both of these in one sitting, they do need to complete each one independently in one sitting as there is no option to Save and Return Later.

Students will need their Federal Student Aid Identification Number (FSA ID). The FSA ID was created during the completion of the Free Application for Federal Student Aid (FAFSA). Students can visit <https://fsaid.ed.gov> if they cannot remember their FSA ID.

Once both documents have been completed, it will take approximately 24-48 hours for DIRI to receive the results electronically.

### **Log in with Verified Mobile Phone Number**

Effective March 31, 2019, following implementation of this enhancement, FSA ID users will be able to log in with a verified mobile phone number as an alternative to a username. Currently, FSA ID users may log in with a username or verified email address. This enhancement recognizes that some FSA ID users may prefer the use of a mobile phone over email and provides greater flexibility for students, parents, and borrowers.

To take advantage of this new option, the user must first register his or her mobile phone number on the [FSA ID website](#) if he or she has not already done so. Approximately one third of all FSA ID accounts already include a verified mobile phone number.

The process to register a mobile phone number is as follows:

- When creating or updating an FSA ID account, the user will be asked if he or she wants to register a mobile phone number. If the user agrees, he or she will enter the mobile phone number. Note that for security purposes, a mobile phone number can only be associated with **one** FSA ID.
- To verify the number, a secure code will be texted to the mobile phone. The text may take a few minutes to arrive.
- The user must then enter the secure code within 30 minutes on the verification page on the FSA ID website and select “Submit.”
- Once the mobile phone number has been verified, it can be used to reset a password, retrieve a username, or unlock an FSA ID account. After implementation of this enhancement on the websites and applications that require an FSA ID, the verified mobile phone number can also be used to log in.

A user may choose to change the mobile phone number at any time by logging in to the [“Manage My FSA ID” page on the FSA ID website](#).

### **Additional Enhancements**

We will also implement several other changes to the FSA ID website to allow users to manage their FSA ID account more effectively, provide enhanced navigation, and strengthen security:

- Warn users who enter an email address domain type of .edu, .k12, .pvt, .tec, or .cc that they should include an email address to which they will not lose access (after graduation, etc.).
- Remove the 18-month password update requirement. A password change will be required only after a security event.
- Remove the requirement for special characters in an FSA ID password. However, we will allow additional special characters in the password field for users who wish to use special characters.
- Warn users when their account is about to be locked. The warning will indicate how many login attempts remain.

Additional, minor changes will be made to further improve the FSA ID user experience by streamlining processes and improving flow.

### **Federal Direct Stafford Loan**

If you borrowed a Federal Direct Stafford Loan, please visit [www.studentaid.gov](http://www.studentaid.gov) to complete Exit Counseling. Exit Counseling is MANDATORY and must be completed before you graduate.

### **Exit Counseling Requirements**

Federal Student loans, unlike grants and scholarships, are borrowed money that must be repaid. Therefore, it is important you learn about your rights and responsibilities as a borrower by way of Exit Counseling.

### **Direct Loan Exit Counseling**

The Direct Loan Exit Counseling session will explain your rights and responsibilities as a borrower. You should understand the importance of borrowing loan funds before completing your promissory note. You may complete the Entrance Counseling session by going to the Direct Loan webpage at <http://www.studentaid.gov/>.

- Hover over Manage Loans
- Click Complete Exit Counseling.
- Click Log In to Start (near the middle of the page).
- Enter FSA username and password (same as FAFSA).
- Click Start.
- Add Rolf Institute of Structural Integration (The) on the left, choose “I am completing entrance counseling to receive Direct Loans as an undergraduate student.”, and then click Continue.

Read the information and complete the questions throughout each page. Once completed, submit and print a copy for your records.

### **Federal Perkins Loan**

(Revised based on [DCL GEN-17-10](#))

Effective 9/30/2017 no new Perkins Loans will be made to Graduate or Undergraduate students. No Perkins Loan disbursements are permitted after June 30, 2018 under any circumstances.

DIRI does not offer the Federal Perkins Loan. If you borrowed a Federal Perkins Loan at a previous institute, you must visit the Office of Financial Aid in person to complete Exit Counseling. Please take the following information with you, as it is required for Perkins Exit Counseling:

- Parents' information, i.e. address, phone number
- Know/have your Social Security Number
- Contact information for (4) references at different addresses from the borrower, i.e. phone and address (NOT including parents)

Exit Counseling is MANDATORY and must be completed before you graduate.

## Section 7: Cost of Attendance Budget

### 7.1 Cost of Attendance Overview

Accurate Cost of Attendance (COA) information is necessary for proper determination of a student's federal award. A student's Cost of Attendance includes tuition, fees, books, and supplies, as well as allowances for room and board, miscellaneous personal expenses, and transportation to/from school. The tuition, fees, books, and supplies component will be calculated based on the institutional charges recorded in the Academic Program Record in EdExpress.

The allowance for room and board, personal expenses, and transportation will be calculated by the EdExpress system based on the length of a student's award/loan period, and the monthly allowances identified below. DIRI is required to provide monthly allowance amounts for each annual budget. The budget should represent reasonable cost estimates for the student, not the entire family, and should not reflect a higher standard of living than one would reasonably expect. Excessive budgets can result in unnecessary over-borrowing on the part of students. Budgets should be reviewed periodically and may be adjusted to reflect significant changes in economic conditions. At DIRI's discretion, any individual student's Cost of Attendance may be modified when packaging the award.

Except for Pell Grants, Federal Student Aid (FSA) award amounts are also constrained by the other **aid** that a student receives, known as estimated **financial** assistance (EFA). The general rule is that the student's total **aid** may not **exceed** the student's **financial** need. (Need = **Cost of Attendance** minus their FAFSA Expected Family Contribution (EFC).)

### 7.2 Determining Cost of Attendance

Costs of Attendance (budgets) are used to calculate student federal aid eligibility and are made up of both direct costs (tuition, fees, books, materials) as well as indirect costs (room, board, transportation, personal expense, etc.). It is recommended that the institution determines a standard amount per month for the indirect costs, i.e., living expenses. Once there is a standard monthly allowance for these items it's easy to simply multiply that number by the number of months in the standard budget period. For student loan awards, budget periods will differ in length depending on a student's enrollment status. For clock-hour programs, part-time students will take more calendar time to complete an academic year/loan period than full-time students. An institution must have Cost of Attendance budgets for both Pell and loan awards.

#### Pell Cost of Attendance

The Pell cost of attendance is used to determine federal Pell eligibility but is often different than the cost of attendance used for loan awards. For purposes of Pell eligibility, only one budget is needed for a full academic year of training for a full-time student. That is typically a 900-hour and 26, or more, week period for most clock-hour programs. Regardless of whether a student is full-time or part-time, or getting Pell for a full academic year or for only a partial academic year, the same budget can be used for all Pell award periods. The law states that a full academic year, full-time budget is ALWAYS used for Pell.

The actual Pell **payment** will be prorated down if the student is being paid for less than a full academic year in hours, but the budget is always for a full academic year. So, whether processing Pell for academic year 1 or 2, the same budget is used. That makes Pell a very easy award to package. If full-time students were scheduled for 30 hours per week, a typical 900-hour period would be 30 weeks long (7 months). That's why a monthly amount for living costs that can multiply by 7 months for a full-time, full academic year budget is suggested. The Pell cost of attendance includes the following components:

- Tuition & Fees
- Books & Supplies
- Room & Board
- Personal Expenses
- Transportation

Each of the above amounts must be based on a full academic year for a full-time student. This will require that prorating the tuition and fee amount if the program in which the student enrolled is not equal to one full academic year. An example of that proration for a program less than one academic year is found below:

**Example of the Cost of Attendance (COA) proration for a program less than one academic year:**

Program Length = 731 hours

Program Tuition & Fees = \$9,995

Academic Year Length = 731 hours

Academic Year Tuition & Fees = \$12,305.75 ( $\$9,995 \times 900 / 731$ )

Multiplying the total program tuition and fee amount by the following fraction will prorate Tuition & Fees.

**Clock Hours in the Academic Year**

**Clock Hours in the Program**

**Clock Hours in the Academic Year and Clock Hours in the Program**

This COA formula will adjust the tuition and fee amount either upward or downward, depending on the length of the program, so that it results in a tuition and fee component for a full academic year.

The books and supplies component of the cost of attendance should be either the actual amount or an estimated cost of books and supplies costs for the full academic year. The remaining cost of attendance components (living costs) will also be based on a full academic year of study for a full-time student. In the previous example of a 7-month academic year, include 7 months' worth of estimated expenses for room & board, personal miscellaneous expenses and transportation to and from school. Determining estimated living costs is discussed in greater detail later. The sum of all five of the budget components, as described above, will be the Pell Cost of Attendance.

## **Determining the prorated amount of charges associated with a payment period**

With the implementation of the cash management final regulations on July 1, 2016, the Department clarified its policy with respect to the proration of charges for books and supplies when a student does not have a real and reasonable opportunity to obtain those books and supplies, and equipment from a source other than the institution. Previously, institutions were permitted to include the full cost of books and supplies as charges for the first payment of a student's attendance when determining the amount of a Title IV aid to credit to the student's account and the amount of any Title IV credit balance to be refunded. However, on or after July 1, 2016, if an institution charges a student for some or all of the student's books and supplies at the beginning of the student's enrollment and the student does not have a real and reasonable opportunity to obtain those materials elsewhere, the institution is required to prorate the cost of those materials under the requirements in [34 CFR 668.164\(c\)\(5\)](#) when determining the amount of Title IV aid to provide to the student as a credit balance during each 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. The institution 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, the institution 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 amount of 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 the institution 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, the institution 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 the institution 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, the institution 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 the institution to hold his or her Title IV credit balance refund under 34 CFR 668.165(b)(1)(ii). Under that authorization, the institution 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) the institution 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 the institution 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 the institution 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 the institution actually paid for the materials, not necessarily what it charged students to purchase them.

### **Loan Cost of Attendance**

The cost of attendance for loan purposes is different from Pell and will more accurately reflect the student's estimated costs for the academic year/loan period. The complete cost of attendance for loan purposes contains the same components as those required for Pell costs:

- Tuition & Fees
- Books & Supplies
- Room & Board
- Personal Expenses
- Transportation

Contrary to Pell costs of attendance rules, which require a full-time, full academic year cost estimate is used, loan costs of attendance will be based on the loan period for each student. For clock-hour programs, the loan period must be consistent with the period that the loan is intended. There are only three scenarios that may be encountered in determining the loan period for a student.

**The program is shorter than the standard 900 clock-hour academic year.**

***Example:***

Academic Year (at least 900 clock-hours and 26 weeks)

Program Length = 731 clock-hours

In these cases, your loan period includes 731 clock-hours and the calendar time it will take for the student to complete the entire program.

**The program is equal to the standard 900 clock-hour academic year.**

***Example:***

Academic Year (at least 900 clock-hours and 26 weeks)

Program Length = 900 clock-hours

In these cases, your loan period includes 900 clock-hours and the calendar time it will take for the student to complete the entire program.

**The program is longer than the standard 900 clock-hour academic year.**

***Example:***

Academic Year (at least 900 clock-hours and 26 weeks)

Program Length = 1500 clock-hours

In these cases, the student's enrollment will span multiple academic years. The student's first loan period will only include the first academic year of study. When the student completes that academic year and progresses to academic year #2, the second loan period will include only the remaining portion of the program (900 to 1500 hours in this example). Each loan period will only include costs of attendance that are incurred during that calendar time.

In the case of a program that is longer than one academic year it is important that the correct tuition and fee amount is included in the cost of attendance budget. For institutions that charge tuition and fees separately by academic year, this is easily determined and the budget for each loan period will include the tuition and fees charged to the student for that specific period.

If students are charged for the entire long-term program upon enrollment resulting in no additional charges being assessed for the second academic year, then the entire tuition and fee amount is charged in the first academic year and accordingly, is only included in the cost of attendance for the first loan period. In these common scenarios, the cost of attendance for the second academic year will contain no tuition, fees, books or supplies and will only include estimated living expenses during the second loan period.

It is a prerequisite that one understands how to determine a loan period before one can determine a cost of attendance for the loan period. Once the loan period for a student is determined, a related cost of attendance can be determined. The cost will include the five traditional components:

- Tuition & Fees
- Books & Supplies
- Room & Board
- Personal Expenses
- Transportation

Only expenses incurred during the respective loan period should be included in the cost of attendance for that loan period. The bottom three living expense components should include the monthly allowance for those expenses multiplied by the number of months in the loan period. The tuition & fee and books & supplies amounts should be the actual costs for those components incurred by the student during the loan period.

### **7.3 Determining an estimated cost for living expenses**

Costs associated with room & board, personal miscellaneous expenses and transportation are determined separately for two groups of students:

- Students, with no dependents of their own, who are living with a parent(s)
- All other students

Contrary to popular belief, the living cost portion of the budgets is not based on a student's dependency status. Aid administrators often refer to "independent" budgets and "dependent" budgets. The budget is based on if the student lives with his/her parent(s), regardless of the student's dependency status. A 26-year-old student independent, by virtue of age, who is living at home with mom and dad, will get a lower cost of attendance budget than a 22-year-old dependent student who lives on his/her own.

#### **Room & Board**

A monthly allowance for room and board should be determined for students based on the two categories noted above. Let's say it is determined to be \$350/month for students living with their parents and \$700/month for those living on their own. For a 7-month full-time budget, it would be \$2450 room & board for students living with parents, and \$4900 room & board for students on their own. For a 10-month part-time budget, the figures would be \$3500 and \$7000, respectively. Keep in mind that budgets are meant to estimate a standard, typical living cost and should not reflect an increased or higher standard of living. Do not use a rent average for upscale, one-bedroom condos in gated communities. Rents should be reflective of "reasonable" costs of living in the area. To arrive at more conservative allowances for rent, consider an average two-bedroom rental cost and use 50% of that as a rent allowance for the student.

## Personal Miscellaneous Expenses

Using the same concept as the room and board example, determine a monthly allowance for personal expenses and multiply that amount by the number of months in the budget. Personal expenses include things like clothing, insurance, utilities, reasonable recreation, etc. Anything other than rent and food, as those costs are covered under the room and board component. This allowance is also typically lesser for students living with a parent. If the allowance was determined to be \$100/month for students living with a parent and \$250/month for students on their own, then the personal expenses portion of a 7-month budget would be \$700 and \$1750, respectively.

## Transportation

Transportation costs cannot include car payments, nor can it include a student's total monthly transportation expenses. It should only represent transportation to/from school. If the area has good public transportation, and a bus pass costs \$125/month, then that's a good allowance for transportation. If not, use a simple estimate for all students. If the typical student drives 5 miles to school, that's 10 miles per day roundtrip, or about 200 miles per month. Using an IRS allowance of about 50 cents per mile would have a \$100/month transportation allowance. In a 7-month budget, the estimated transportation costs are \$700.

Those are the only items needed in a standard budget. An "Other" category may be added to account for special circumstances, like childcare, but it should not be in a standard budget. Not all students will incur childcare costs while the student is in school. These, or other reasonable costs, may be added to an individual student's budget, if necessary, on a case-by-case basis.

When all is said and done, there could conceivably be at least five different costs of attendance budgets for a single program at the Rolf Institute as follows:

- One Pell cost of attendance
- Two loan costs of attendance for full-time students o one for students living with parents and one for those on their own
- Two loan costs of attendance for part-time students o one for students living with parents and one for those on their own

For programs longer than one academic year, multiple academic years and loan periods are involved. This results in even more budgets for estimated expenses for second academic year loan periods. Once a monthly allowance is determined for room & board, personal expenses, and transportation it is easy to establish dozens of different budgets for different loan periods. These budgets can be stored in the Team software for easy retrieval during the award packaging process.

After standard budgets are developed, they should be used consistently from that point forward. Additional budgets may be developed as time goes on and those can be added to the database. Review cost of attendance budgets annually and make modifications as desired.

Maintain documentation of how budgets were determined. The tuition, fee, book and supply costs are easily documented by enrollment agreements and other school publications.

Regarding the living expense portion of the budgets, there are a couple of different approaches to both determine allowances, as well as to maintain documentation on those estimates.

### Online Research

The internet is a vast tool that can assist in obtaining estimated costs of living. Search for local area rent estimates and visit governmental statistical sites that can provide valuable information. Performing a Google search on “living expenses” will display several helpful sites. Attached to this publication is a copy of monthly living cost estimates prepared by the Internal Revenue Service in 2015. See its website for more up-to-date information as time passes.

### Student Surveys

Another option is to create a survey requesting information about rent expenses, grocery expenses, utility fees, and other costs of living. The survey can be distributed to current students. The results can be averaged to determine estimated monthly costs of living of the student population.

There are certainly other sources of data that can be utilized, but the above two options should be more than adequate to determine reasonable costs and have the documentation to back it all up.

### Sample Calculations

The following chart provides an example of cost of attendance calculations for a typical program that has been used throughout this publication.

#### **GEMCOR, Inc. (May 2015)**

Allowable Living Expense National Standards - effective 03/30/2015

Expense	One Person	Two Persons	Three Persons	Four Persons
Food	\$315	\$588	\$660	\$821
Housekeeping supplies	\$32	\$66	\$65	\$78
Apparel & services	\$88	\$162	\$209	\$244
Personal care products & services	\$34	\$61	\$64	\$70
Miscellaneous	\$116	\$215	\$251	\$300
Total	\$585	\$1,092	\$1,249	\$1,513
More than four persons			Additional Persons Amount	
For each additional person, add to four- person total allowance:			\$378	

Please note that the standards change. It is recommended to check the IRS.gov website periodically for the latest version.

## Section 8: Applying for Financial Aid

### 8.1 General Requirements for Eligibility

(see 34 CFR 600.20;600.21)

Students applying for federal grants and financial aid:

1. Must be a U.S. Citizen or Eligible Non-Citizen
2. Have a valid Social Security Number
3. Have a High School Diploma or GED
4. Be enrolled in the Basic Rolling Certification Program in Boulder, CO.
5. Complete the online application process
6. Maintain Satisfactory Academic Progress
7. Must have a financial need
8. Not be in default on any National Direct Student Loan, Guarantee Student Loan, or owe a refund on any Title IV Grants at any institutions previously attended

### Selective Service System

Males aged 18-25 are required to complete selective service registration. The Director of Financial Aid will verify registration status at [www.sss.gov](http://www.sss.gov). If the registration is not complete, the student is instructed to go to the website to complete registration. If the student is female, the FAFSA information is corrected and the checklist for additional documentation is waived.

Male students are exempt from selective service registration if any of the following are true:

- Current active duty military
- Not yet 18 as of the date the FAFSA is completed
- Born before 1960
- Non-citizens who first entered the US after age 26 or who entered the US as lawful nonimmigrants on a valid visa and remained in the US on that visa until after they turned 26

If the Director of Financial Aid has adequate information to determine that the student is not required to register, the Financial Aid Office would note this in the software and/or in the student file and proceed accordingly. Otherwise, the student will be asked to register or provide appropriate documentation regarding the selective service registration exemption.

If a student has not registered and cannot provide documentation of an exemption, he must contact the Selective Service to get a status information letter addressing his failure to register. This letter will be used to determine if the student is exempt from registration, or if he knowingly and willfully failed to register. If the student knowingly and willfully failed to register, he is not eligible for federal student aid.

Males over the age of 26, born 1960 or later, who are not registered with Selective Service must see the Director of Financial Aid to complete the Selective Service Appeal Process.

## Drug Conviction

If a student has a federal or state drug conviction during a period of enrollment for which the student was receiving federal aid, the student is disqualified from federal financial aid funding. Students self-report this information on the FAFSA. However, in situations of conflicting information, the School is required to confirm this information.

The student regains eligibility based on the timeline in the chart below (Please note - if the student is convicted for both possession and sale, the longer period applies):

### ***Possession of illegal drugs Sale of illegal drugs***

- 1st offense: 1 year from date of conviction 2 years from date of conviction
- 2nd offense: 2 years from date of conviction indefinite period
- 3+ offenses: Indefinite period

Students regain eligibility one day after the period of ineligibility ends, or after successfully completing a qualified drug rehabilitation program including passing two unannounced drug tests given by such a program. It is the student's responsibility to provide this documentation. Qualified drug rehabilitation programs must include at least two unannounced drug tests and satisfy at least one of the following:

- Be qualified to receive funds directly or indirectly from a federal, state, or local government program.
- Be qualified to receive payment directly or indirectly from a federally- or state-licensed insurance company.
- Be administered or recognized by a federal, state, or local government agency or court.
- Be administered or recognized by a federally- or state-licensed hospital, health clinic, or medical doctor.

Students identified as ineligible due to a drug conviction (either through the FAFSA information or through confirmation of conflicting information) will be notified in writing of the loss of eligibility, as well as additional information regarding when and how to regain eligibility.

## 8.2 First Step in Applying for Financial Aid

The first step in applying for financial aid is for the student to complete and submit the *Free Application for Federal Student Aid (FAFSA)* to the U.S. Department of Education's Central Processing System (CPS). Additionally, if students are applying for federal student loans, they should electronically complete a master promissory note (MPN), and any required loan counseling online as well. This ensures that the student is obtaining the most up-to-date loan counseling material available.

The United States Department of Education (USDE) operates a website specifically designed for student-use regarding their financial aid processes. This site may be found at [www.studentaid.gov](http://www.studentaid.gov). Although the web address identifies the sites at "Student Loans" it is a homepage for students to control their federal ID.

From this site, students can navigate to the FAFSA applications necessary for any type of federal aid, complete their master promissory notes (MPNs), access loan counseling necessary for federal student loans, and apply for FSA User IDs. FSA User IDs are necessary as both login security and as an electronic signature on all web-based applications. It is preferred that students visit this site and complete all tasks online. To satisfy the signature requirements of the FAFSA, the student can either print a certification page from the website, sign it, and mail it into the USDE, or a more efficient approach is to satisfy the signature requirements electronically with their FSA User ID certification.

Once a student's FAFSA has been filed and the signature requirement has been met, an Institutional Student Information Record (ISIR) will be produced and returned to DIRI electronically via daily EdConnect file transmissions. The ISIR is the core document necessary to begin the financial aid award process. ISIRs are uploaded into the EdExpress System daily, along with confirmations from the USDE regarding completed MPNs and completed loan-counseling requirements. Completion of these three requirements by the student is mandatory before any further financial aid determination or packaging can be done. Once the Financial Aid Office receives a valid ISIR for a student, the student's award package can be processed.

The packaging of student's awards, and related activity regarding the student's federal aid awards, are administered through the EdExpress Software System.

The FAFSA is available in paper and electronic formats. A paper version is available by calling 1-800-4-FED-AID or going [here](#).

The Federal deadline for submission of the Free Application for Federal Student Aid (FAFSA) is June 30 of the current year. The last date by which federal loans can be processed to ensure compliance with cash management regulations and guaranty agency rules is June 30 for the current aid year. Deadlines for submission of verification worksheets, relevant income verification documents and various comment code clearance documentation, etc. may vary. Students must speak to the Director of Financial Aid to find the required deadlines. Students are also informed of deadlines by telephone calls, emails, and general letters.

### **8.3 Expected Family Contribution**

All the data used to calculate the Expected Family Contribution (EFC) is obtained from the FAFSA. The CPS analyzes the information from the FAFSA and calculates the EFC. The school determines the student's eligibility based on the EFC, which is the amount of money a family will be expected to contribute to the student's education. The EFC is subtracted from the school's Cost of Attendance (COA), also known as the "student budget". The student budget includes fees, room and board, travel, and personal expenses.

The lower the EFC, the greater the chances are of receiving financial aid. DIRI, along with the Department of Education determine the amount of the student's PELL Grant award based on EFC, cost of attendance (COA), enrollment status, length of enrollment, and defined academic year.

## 8.4 SAR or ISIR (Institutional Student Information Record)

The official federal document necessary to award federal student financial assistance is the Student Aid Report (SAR), or the electronic Institutional Student Information Record (ISIR). The student, for accuracy, must review all SARs or ISIRs, and any necessary corrections should be made prior to awarding Title IV aid to any recipient. Special attention should be paid to the EFC area on the SAR or ISIR. If DIRI sees an asterisk "\*", or the letter "C", next to the EFC number, additional documentation will be necessary to resolve this issue before awarding funds to the student.

DIRI will review SAR and ISIR files submitted to determine accuracy with verification or Comment Codes "C" code, resolution documents. Although allowed by some regulations, DIRI will not process a SAR or ISIR that does not contain complete documentation. Processing incomplete files would become potential liabilities to the institution. Any incomplete file will require corrective action. Regulations effective July 1, 1995 eliminate the requirement that a student sign his or her SAR or ISIR. However, the collection of these signed certifications is still required at some other point in the enrollment process. Please note that failure to collect these signed certifications may result in the student's ineligibility for federal aid. For convenience, these statements are included in the student's FAFSA certifications.

## 8.5 Conflicting Information: Database matches, Reject Codes & "C" Code Resolution

A Comment Code, or "C" Code occurs whenever the letter appears next to the EFC number on the SAR or ISIR. A "C" code may be informational, but generally indicate that there was a mismatch of applicant information with one of several other federal agencies:

- Selective Service System
- Department of Homeland Security (DHS)
- Social Security Administration (SSA)
  - Citizenship
  - Student's Social Security Mismatch
- Department of Defense (DoD)
  - Veteran's Affairs Status
- National Student Loan Data System (NSLDS)
  - Defaulted Student Loans
  - Potential Pell Overpayment
  - Potential FSEOG Overpayment
  - Potential Perkins Overpayment
  - Potential TEACH Grant Overpayment
  - Potential Iraq and Afghanistan Service Grant Overpayment
- Department of Health and Human Services (HHS)
- Department of Justice (DOJ) via ED Hold File
  - Drug Conviction

Applicant data, which conflicts with what the government has on file, will result in a “C” code. The narrative or comments section of a SAR or ISIR will describe what caused the “C” code and what is necessary to resolve it. Many “C” codes result from applicants whose citizenship is questioned. This would require confirmation from the local Department of Homeland Security, formerly, the Immigration and Naturalization Service (INS).

Prior to issuing payments to DIRI for students, the Institute must receive an accepted origination and disbursement record from the Department of Education. This process is generally completed within 48 hours of receipt of the student’s information and ensures that the USDE has already authorized payments to students before an award check is issued.

## **8.6 Transfer Students and the National Student Loan Data System**

The National Student Loan Data System (NSLDS) stores historical data relative to a student’s financial aid payments at prior schools. This information is automatically included on the last page(s) of a student’s ISIR, and in most cases, is all that the Institute will need to comply with financial aid transcript requirements. However, due to delays in getting accurate data into the NSLDS from other schools and agencies, students who transfer to DIRI during the current award year, should have their ISIR information updated through the NSLDS system. This will provide up-to-date information on the Federal Aid that a student was awarded at past institutions and information concerning the student’s default status on any prior loans.

## **8.7 Verification**

(See 34 CFR 33 668.53)

Verification is a process that requires an institution to confirm the data that a student has included in his/her application for federal assistance. Generally, schools must perform verification procedures on selected files. A file has been selected for verification if the EFC number or the SAR or ISIR is followed by an asterisk “\*”.

For applicants selected for verification, the required documents will vary. Below is a list of data that may be verified:

1. Adjusted gross income (AGI)
2. U.S. income tax paid
3. Education credits
4. Untaxed pensions
5. IRA deductions and payments
6. Tax-exempt interest
7. Income earned from work
8. Household size
9. Number in college
10. High school completion status
11. Identity/statement of educational purpose
12. Certain type of untaxed income and benefits
  - Untaxed payments to IRA and/or KEOGH plans
  - SNAP Verification

- Interest on tax free bonds
- Worker's Compensation
- Cash received, or any money paid on a student's behalf, not reported elsewhere

Once the student provides verification data, there may be instances that warrant a change to financial aid award. The financial aid office will review a student's circumstances and make any needed adjustments to an award and to release a revised award letter to the student. Students who fail to submit corrections or verification documents to the financial aid office within two weeks (14) days of being notified in writing by email by the financial aid office may not be awarded financial aid. Documents may include a copy of the student's taxes, state identification card, high school diploma or equivalent, and a signed statement.

### **Verification for tracking Groups V4 & V5**

(See FR Doc No: 2014-16270)

Files assigned to Verification Tracking Groups V4 or V5 must be reported to CPS within 60 days following the institution's first request to the applicant to submit the required V4 or V5 identity and high school completion documentation. Institutions must update a previously reported V4 or V5 status for any applicant whose status changes within 30 days of the change.

Institutions must report the verification results of identity and high school completion status, as described below, for any applicant for whom the institution received an ISIR with a Verification Tracking Group of V4 or V5, and for whom the institution requested verification documentation. Institutions should only use this reporting function for applicants where the CPS placed the applicant in Verification Tracking Groups V4 or V5. It should not be used in instances where the institution selected the applicant for verification of identity or high school completion status.

Verification of an applicant's high school completion status is not required for subsequent years if the institution successfully verified and documented the applicant's high school completion status for a prior award year. However, the institution must report the verification results for the subsequent year as if verification was satisfactorily completed for that year.

## **8.8 Payment Periods**

(See 34 CFR 668.4)

For clock-hour programs, the payment period is defined not only in clock-hours but also in weeks of instructional time. A student must successfully complete the clock-hours and weeks of instructional time in a payment period to progress to the next payment period.

Because DIRI programs are non-standard programs of less than one year, consisting of 600 and 731 clock-hours, there are only two payment periods. The Financial Aid Office determines if disbursement is an initial (first-ever received) Pell or Loan disbursement. Students are paid the first time after 30 days of attendance, based on the first day of their enrollment and good standing, if ISIR/SAR is received prior to the end of student's first pay period, i.e. 30 days after the start date of the program.

The second disbursement is based on satisfactory progress and successful completion of the first half of the clock-hours in the program, and half of the weeks in the program. The Financial Aid Office consults a program schedule and ascertains the beginning and ending dates of each payment period. They then determine in which award year each payment period belongs. An award year is defined as January 1 of one year to December 31 of the next year. If most of a payment period occurs entirely within an award year, it is part of that award year.

### **Determination of Payment per Payment Period**

For each payment period classified as being part of the current award year, the formula for determining payments are clock-hours in the payment period multiplied by the scheduled award from full-time payment chart and divided by hours in the academic year.

### **First Payment Requests**

When submitting a student's file for processing of his/her first payment of Pell or Direct Loan funds in an award year, DIRI will need to verify the following information:

1. Student Aid Report (SAR) and ISIR (if applicable)
2. Complete Package in EdExpress.
3. Complete Verification material (if applicable)
4. "C" Code Resolution Documentation (if applicable)
5. Originate File via EdExpress/EdConnect

### **EdExpress Process**

(see Appendix F- EdExpress Procedures)

### **Subsequent Payment Requests**

EdExpress will automatically schedule future payments to a student at the time the origination/disbursements are set up. The schedule shall coincide with the remaining payment periods in the DIRI academic year. When students reach a subsequent payment period, and DIRI has determined that the students have maintained satisfactory progress in accordance with published standards, DIRI will request the subsequent payment via EdExpress/EdConnect, and then the G5 system.

## **Section 9: Professional Judgment & Dependency Overrides**

The Free Application for Federal Student Aid (FAFSA) does not provide families with a place to explain special circumstances affecting their ability to pay for the student's education. The Federal Need Analysis Methodology (FM) is likewise a rigid formula, with no provisions for exceptions. To remedy this, Congress has delegated to the school's financial aid administrator the authority to compensate for special circumstances on case-by-case basis with adequate documentation. As the man or woman in the field, the financial aid administrator is best able to evaluate the family's situation and to make appropriate adjustments.

Professional Judgment refers to the authority of an Institution's financial aid administrator to adjust the data elements on the FAFSA and to override a student's dependency status. The school does not have the authority to change the need analysis formula itself or to make direct

adjustments to the Expected Family Contribution (EFC). Instead, DIRI may adjust the inputs to the formula. The changes to the inputs are dictated by the impact of the special circumstances on the family's income and assets. The standard formula is then applied to the new data elements, yielding a new EFC figure.

Professional judgment does allow a financial aid administrator to adjust the information on the form, but only given the existence of special circumstances. When there are no special circumstances, the information may not be changed. A change in certain items, such as a change in income due to job loss, is in and of itself a special circumstance. A change in other items, such as the student's marital status, does not on its own constitute a special circumstance meriting an adjustment.

Thus, there are three types of changes a financial aid administrator may make to a student's application:

- **Corrections:** Information on the original application was not accurate as of the application date. Corrections are permitted at any time.
- **Updates:** Information on the original application was accurate as of the application date but has since changed and the application no longer accurately reflects the student's situation. Some data elements may not be updated. Other data elements may be updated, but only through verification. A few data elements may be updated at any time.
- **Adjustments and Overrides:** Information on the application is accurate, but special circumstances justify a change. Adjustments may only occur through an exercise of professional judgment.

The decision of the financial aid administrator is final. There is no appeal. By law, neither the school's president nor the US Department of Education can override the financial aid administrator's decision.

The DIRI Director of Financial Aid may use professional judgment, only on a case-by-case basis, to either increase or decrease one or more of the data elements used to calculate the Expected Family Contribution (EFC). The reason must be documented in the student's file and must relate to that student's specific special circumstances.

DIRI students who want to be considered for a professional judgment are required to complete the Professional Judgement Appeal Form for that academic year. They are also required to submit all requested documentation that pertains to his/her special circumstance. Once these items are received, the Director of Financial Aid, in collaboration with the Director of Operations & Systems Management can:

- Verify the student if selected for verification. If he/she was not selected for verification it may be done manually.
- Once verification results are back, appropriate adjustments can be made, and changes can be submitted.

DIRI's Director of Financial Aid, in collaboration with the Director of Operations & Systems Management, can submit the student's corrections if DIRI is listed as an institution on the student's FAFSA.

The Rolf Institution must keep signed documentation for corrections submitted electronically. If a FAA uses professional judgment to adjust a data element, he or she must use the EFC consistently for all federal student aid awarded to that student. A Professional Judgement Appeal Form is included in the Appendix B.

## **Section 10: Disbursing Funds**

### **10.1 GAPS/G5 Federal Fund Draw downs**

(see Appendix G- G5 Procedures)

Federal funds necessary to cover awards accepted by COD each day are electronically deposited into the DIRI federal funds bank account. DIRI initiates the process of drawing down funds when they place a request for funds through the USDE's G5 website also known as the Grants Administration and Payment System (GAPS). When necessary, the Director of Financial Aid reviews EdExpress, along with the student roster, to determine if additional funds are needed for deposit into the account to cover any award journals.

### **10.2 Federal Cash Management Policy**

When necessary, the balance of federal cash in the Institute's account is reviewed to determine if sufficient funds are on hand to cover awards processed. The balance reviewed would be the balance of Title IV program funds on hand as of that day and would include any Title IV refunds or award adjustments recorded as of that day.

In the event the balance of Title IV program funds on hand is sufficient to cover the awards processed for the day, no additional funds will be requested from the Department of Education.

In the event the balance of Title IV program funds on hand is not sufficient to cover the awards processed for the day, a request for additional funds from the Department of Education will be made by the Director of Operations & Systems Management through the G5 Grants Administration and Payment System (GAPS).

The amount of funds requested will be computed from the following formula: Total amount of Title IV program awards processed for students minus the total amount of Title IV program funds on hand including refunds & adjustments.

The above policy will strictly control occurrences of excessive cash maintenance and will provide for better program integrity and accountability.

### **10.3 Credit Balances and Voluntary Authorization to Retain Funds**

A federal student aid (FSA) credit balance exists when HEA, Title IV federal student financial assistance funds, received on behalf of a student for a payment period, exceed the amount of institutional charges assessed to the student by the institution for that period. The FSA funds involved include Federal Pell Grants, Federal Direct Stafford Student Loans, Federal Direct PLUS loans, and Federal Campus-Based Program funds.

FSA credit balances issued to a student may be used for costs of attending school other than tuition and fees, as estimated in the Cost of Attendance budget, or a FSA credit balance may be retained by the institution with the student's authorization (or parent's authorization in the

case of a PLUS loan), and these funds could be applied to cover other educational charges owed by the student. These other charges may include but are not limited to charges for tuition, fees, textbooks, supplies, uniforms, or materials purchased by the student, or any other educationally related charge incurred by the student.

Requesting that the institution retain the credit balance can assist with more efficient budgeting of educational expenses and can result in students being able to complete their education without incurring unnecessary additional student loan debt. If a student does not wish to have the institution temporarily retain their credit balance, then any FSA credit balance will be returned to the student within 14 days of the date the credit balance occurred. The student will be responsible to personally pay for any other educationally related charges incurred if the FSA credit balance is returned to the student and the student incurs other charges.

This authorization will remain in effect for each subsequent FSA payment period unless the student withdraws it. If at the end of each academic year, or at the end of the program of study if earlier, it is determined that an FSA credit balance will not be applied to other educational charges, the FSA credit balance will be returned to the student within 14 days of the end of the academic year or program. Signing this authorization is optional and voluntary. The student may cancel this authorization at any time or refuse to authorize the use of FSA funds for any individual item. Cancellation can be done by notice to the Financial Aid Office. Cancellation is effective upon receipt of notice of cancellation and is not retroactive. The student, and/or parent, will not earn interest on any credit balance funds held by the institution on behalf of the student or parent.

## Section 11: Last Date of Attendance

### 11.1 Authority

(Federal Refund Policy (Title IV Funds 34 CFR 668.22))

**Authorization** – The Return of Title IV Funds Policy applies to any student who receives Title IV funding and withdraws. The withdrawal process is defined as occurring when a student notifies the Institute, in written or oral form, of his or her intent to withdraw. If notification is given, or if the student begins the withdrawal process, the Rolf Institute will determine the date of withdrawal as the date the student ceased attendance.

The amount of Title IV funds earned by a student is based on the amount of time spent in attendance by the student for that term.

### 11.2 Purpose

The purpose of the Last Date of Attendance Policy is to appropriately assess the financial liability for students, ensure good stewardship of financial aid funds and limit the financial liability for the Institute, and academic consequences for the student.

### 11.3 Responsibility

**Student** – Students are expected to regularly attend classes in which they are enrolled and abide by The Rolf Institute's Policies. Students, who decide to stop attending any part of a program, should immediately drop/withdraw from their course(s) by notifying the Office of Educational Services. A student, who is administratively withdrawn pursuant to this policy, remains financially responsible for the course and other related expenses. Additionally, a student, who is administratively withdrawn pursuant to this policy, is responsible for any academic consequences pursuant to DIRI SAP Policy– Satisfactory Academic Progress – Academic and Financial Aid.

### 11.4 Definition of Attendance

All students must demonstrate a satisfactory amount of participation to have attended the course. This is described as putting forth a satisfactory amount of effort to achieve a successful result in the course. This generally involves a student completing some type of “academically related activity” be considered participating. This may include any of the following as defined by the course syllabus or student handbook/policies:

1. Class attendance (including attending for most of the class period); or
2. Participation in mentoring or assisted instruction; or
3. Completing any required examinations or quizzes; or 4. Completion of an academic assignment, paper, or project.

## 11.5 Process

A student who fails to officially withdraw from their course(s) may be administratively withdrawn from the course at the time that he or she stops participating in the course or if he or she never attends the course. Specifically:

1. Students may be administratively withdrawn from a course if they do not demonstrate a satisfactory amount of participation (based on the factors outlined above) for a period of 3 calendar days unless they have received approval from their instructor or have an approved Leave of Absence.
2. If a student's absence or lack of participation, in a short-term or specific program course, violates a program's requirements, the student may be withdrawn from the course according to the policies set forth in the relevant handbook/policy.

The withdrawal date may be considered to be the last date the student "attended" as defined in above.

## **Section 12: Refunds and Return of Title IV Funds**

### **DIRI Refund Components and Policy**

The Rolf Institute Refund and Return of Title IV Funds policy, in accordance with the accrediting agency and state education department policies, is expressed as a schedule of revised institutional charges incurred by students who withdraw based on the length of time, they remain enrolled or the consumption of services. The refund policy is entirely the purview of the DIRI Educational Services Office, working collaboratively with the Financial Aid Office and Office of Accounting. The Educational Services Office is responsible for developing, updating, and distributing the policy to all offices and students. The Rolf Institute includes the institutional refund policy as a part in the 'Enrollment Agreement' form, which applies to all DIRI students.

### **12.1 Calculating tuition and fees refunds and Title IV Return of Unearned Funds**

In the event a student withdraws or is terminated from the program, a tuition refund calculation in accordance with DIRI's Refund and Return of Title IV Funds policy must be performed and any resulting refunds must be repaid by DIRI. For Title IV recipients, a Return of Unearned Title IV (R2T4) funds calculation must be performed before an institutional refund calculation which is based off of the student's last date of attendance.

DIRI has two types of withdrawals:

1. Voluntary(Official)
2. Involuntary (Unofficial)

Voluntary withdrawals occur when a student notifies a member of the DIRI Administrative staff that they will not be continuing with their schooling. Notifications can be in person, by phone, or via email.

Involuntary withdrawals occur when a student stops showing up for class and the Administration is unable to get in contact with them. If a student does not return from an approved Leave of Absence, or a Cohort Change Request causes the student to out of school for over 180 days they would also be involuntarily withdrawn and would be required to complete the reenrollment/reinstatement process.

Involuntary withdrawals may also be classified as Terminations depending on the circumstances surrounding the withdrawal. Violations to the DIRI Code of Conduct, Sexual Harassment Policy, DIRI Drug and Alcohol Policy, or the DIRI Copyright Infringement Policy would be noted on the Withdrawal form.

The withdrawal date/determination date is based on the date the student notified the school they are not returning, or the date the school realized the student is not returning or will be out for more than 180 days. The determination date will be no later than 14 days after the student's last date of attendance.

Both federal and institutional refund calculations are based on the student's last date of attendance.

Any unearned Title IV funds must be returned to the federal aid account within the regulatory 45-day deadline. When returning unearned Title IV funds, or making tuition refunds, the money must be returned in the following mandated order:

- Unsubsidized Federal Stafford loans.
- Subsidized Federal Stafford loans.
- Unsubsidized Direct Stafford loans (other than PLUS loans).
- Subsidized Direct Stafford loans.
- Federal Perkins loans.
- Federal PLUS loans.
- Direct PLUS loans.
- Federal Pell Grants for which a return of funds is required.
- Academic Competitiveness Grants for which a return of funds is required.
- National Smart Grants for which a return of funds is required. • Federal Supplemental Educational Opportunity Grants
- (FSEOG) for which a return of funds is required.

For Title IV, DIRI must notify AcctTwo to move funds from the DIRI Operations Account to the DIRI Federal Funds account immediately when making Pell or FDSL refunds. Once the funds have been successfully transferred, DIRI will make a Refund entry on the student's ledger, as well as a Credit entry (if no tuition is due).

DIRI will then adjust in EDEExpress, which will be sent to the Common Origination and Disbursement (COD) database via the next EdConnect transmission. Within three business days the Director of Operations & Systems Management will initiate a return via the G5 system.

All financial aid (Title IV) recipients who withdraw and have completed 60% or less of the payment period for which they have been charged, are subject to the federal refund regulations per 34CFR 667, 682, 685, published November 1, 1999. Federal regulations state that the amount of a Title IV refund is based on the percentage of Title IV funds earned by the student at the time of withdrawal. To determine whether Title IV funds must be returned, the school will calculate the following:

1. Determine the percentage of the period of enrollment (for clock-hours program) completed, the number of hours \* scheduled in the payment period is divided by the total hours \* in the payment period.
2. The net amount of Title IV funds disbursed, and that could have been disbursed for the period of enrollment or payment period is multiplied by the percentage completed. The result is the amount of earned Title IV aid.
3. The earned aid is subtracted from the aid that was disbursed to, or on behalf of, the student.
4. Unearned aid is allocated back to the Title IV programs in the following order as specified by law:
  - a) Unsubsidized Stafford Loan Program
  - b) Subsidized Stafford Loan Program

### c) PLUS Loan Program

#### **Late or Post-Withdrawal Disbursements**

Students may be eligible for a late or post-withdrawal disbursement if they have accepted aid that did not disburse at the time of withdrawal from DIRI if they meet the required conditions for such a disbursement. The Department of Education must have processed a SAR or ISIR with an official expected family contribution (EFC), and the loan must have been originated prior to the student's last date of enrollment. For first-time loan borrowers, the student must complete at least 30-days of the program.

Grants should be disbursed before available loan funds. DIRI is not required to obtain permission from the student to credit the student's account with eligible grant funds as long as the funds are being used to cover the cost of tuition and fees. The post-withdrawal disbursement must be credited to the student's account within 180 days of the date of determination.

If the student is eligible for a late loan disbursement, the Office of Financial Aid will send notification via email of the action required to either accept or decline a portion, or all, of a late disbursement. The student or parent has 30 days from the date of determination to respond instructing DIRI to make a post-withdrawal disbursement. If the student or parent does not respond within the 30 day timeframe, but within 180 days of the date of determination. DIRI may make the late disbursement upon request at a later date.

The student is notified by mail and email with the outcome of the late request. Post-withdrawal disbursements cannot be made after 180 days of the date of determination that a student withdrew or ceased attending.

#### **Cancellation for DIRI programs measured in clock-hours.**

The following refund and return to Title IV policies will be superseded if the Federal Pro-Rata refunds policy results in a refund that is more beneficial to the student. The date of withdrawal for refund purposes is the last date of attendance. Fees and charges paid to the school for goods and services, which have not been provided by the DIRI and accepted by the student, shall be refunded.

Any moneys paid to the Rolf Institute in excess of the sum due the school by the student who cancels, withdraws, or is discontinued will be refunded within thirty (30) days of such action. The failure of a student to notify the Director of Admissions in writing of withdrawal may delay refund of tuition due pursuant to Section 5001 and 5002 of the Education Law. The policy for granting credit for previous training shall not impact this refund policy.

1. A student who has not signed the DIRI Enrollment Agreement or has not been accepted to the program may cancel at no penalty.
2. A student may cancel his or her DIRI Enrollment Agreement at no penalty, with the exception of the application fee, within three days of signing the agreement, provided the student has not entered into instruction.

3. After three days of signing the DIRI Enrollment Agreement, students are responsible for 50% of the initial Program Deposit and the Application Fee, provided the student has not entered into instruction.
4. If the student withdraws or is discontinued after instruction has begun, the school may retain not more than: The Application Fee, \$100 for the Anatomy textbook and eBook, the full Program Deposit (applied to tuition), and any tuition and fee liability for the current phase as of the student's last date of physical attendance.

Tuition liability is determined by taking the total tuition cost for the program, divided by the number of clock-hours in the program to get an hourly rate. The hourly rate is then multiplied by the number of hours completed in the phase in which the student discontinued attendance.

Fee liability is determined by taking the total cost of fees for the phase in which the student stopped attending, divided by the number of clock-hours in the phase.

*\*If students withdraw after completing a phase, they are liable for 100% of the tuition and fee charges for that phase.*

**For the Basic Rolwing Certification programs, total tuition and fee liability (minus \$100 for the Anatomy textbook/eBook) is:**

**Example 1:**

Student enrolls in the 731-hour Basic Rolwing Certification Program and completes 40 hours of Instruction in Phase 1 before withdrawing. The student receives the Anatomy textbook and eBook.

Total program charges are:

- \$50 for the application fee
- \$22,021 for tuition
- \$805 for mandatory student fees, which includes \$100 for the anatomy textbook.

Calculate the Hourly Tuition Rate and Tuition Liability:

- $\$22,021 / 731 \text{ hours} = \$30.12 \text{ per hour}$
- $\$30.12 * 40 \text{ hours completed}$   
 $= \$1204.98 \text{ (tuition liability for Phase 1 only)}$

Calculate the Hourly Fees Rate and Fee Liability:

- $(\$310 \text{ (Phase 1 fees)} - \$100 \text{ anatomy textbook}) / 218 \text{ hours in Phase 1} = \$0.963 \text{ per hour}$
- $\$0.963 * 40 \text{ hours completed}$   
 $= \$38.52 \text{ (fee liability for Phase 1 only)}$

Summary of Phase 1 Withdrawal Charges:

- \$50 application fee
- \$100 anatomy textbook
- \$600 Program Deposit (total Program Deposit less \$300 applied to Phase 1 tuition charges)
- \$1204.98 Phase 1 tuition

- \$38.52 Phase 1 fees  
= \$1993.50 Total Tuition and Fee Liability

### **Example 2:**

Student enrolls in the 731-hour Basic Roling Certification Program and completes 218 hours of Instruction in Phase 1 and 40 hours of Instruction in Phase 2 before withdrawing. The student received the Anatomy textbook and eBook in Phase 1.

Total program charges are:

- \$50 for the application fee
- \$22,021 for tuition
- \$805 for mandatory student fees, which includes \$100 for the anatomy textbook.

Calculate the Hourly Tuition Rate and Tuition Liability:

- $\$22,021 / 731 \text{ hours} = \$30.12 \text{ per hour}$
- $\$30.12 * 40 \text{ hours completed}$   
= \$1204.98 (tuition liability for Phase 2 only)

Calculate the Hourly Fees Rate and Fee Liability:

- $(\$195 \text{ (Phase 2 fees)} / 244 \text{ hours in Phase 2}) = \$0.799 \text{ per hour}$
- $\$0.799 * 40 \text{ hours completed}$   
= \$31.96 (fee liability for Phase 2 only)

Summary of Phase 2 Withdrawal Charges:

- \$50 application fee
- \$300 Program Deposit (total Program Deposit less \$300 applied each to Phase 1 and Phase 2 tuition charges)
- \$1204.98 Phase 2 tuition
- \$31.96 Phase 2 fees
- \$4873 Phase 1 tuition
- \$310 Phase 1 fees (including the Anatomy textbook)
- = \$6769.94 Total Tuition and Fee Liability

### **For students with Title IV, Withdraw Before 60%**

The institution must perform an R2T4 to determine the amount of earned aid through the 60% point in each Title IV payment period (before 366 clock-hours, i.e., prior to the mid-point of the program). The institution will use the U.S. Department of Education prorate schedule to determine the amount of the Return to Title IV (R2T4) funds the student has earned at the time of withdrawal.

### **For Students with Title IV, Withdraw After 60%**

After the 60% point in the Title IV payment period (at 366 clock-hours, i.e., mid-point of the program), a student has earned 100% of the Title IV, HEA funds he or she was scheduled to receive during this period. The institution must still perform an R2T4 to determine the amount of aid that the student has earned.

## Calculation Method

The Institute measures progress in clock-hours and uses the Title IV 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 for clock-hour programs:*

1. Determine the percentage of the period completed:  
Divide the clock hours scheduled to have been completed as of the withdrawal date in the payment period by the total clock hours in the payment period.

HOURS SCHEDULED TO COMPLETE TOTAL HOURS IN THE PAYMENT PERIOD =  
% EARNED

(Rounded to one significant digit to the right of the decimal point, ex.: .4493 = 44.9%.)

The following guidance applies to calculations for clock hour and credit hour programs:

- 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.
2. Percentage earned from (multiplied by) total aid disbursed or could have been disbursed = AMOUNT STUDENT EARNED.
  3. Subtract the Title IV aid earned from the total disbursed = AMOUNT TO BE RETURNED. 100% minus percent earned = UNEARNED PERCENT
  4. Unearned percent (multiplied by) total institutional charges for the period = AMOUNT DUE FROM THE SCHOOL

## Institutional Refund Repayment Appeals

DIRI does not have any provisions for students to appeal the amount of an institutional refund, the amount of outstanding charges, or the repayment process. However, the student may contact Office of Educational Services and speak to a representative to further discuss their outstanding charges if he/she wishes to do so.

## 12.2 Title IV Common Types of Overpayment to Student

An overpayment occurs anytime a student receives a Title IV payment that is greater than the amount for which the student is eligible. Examples of the four most common types of overpayments are as follows:

1. Student error, such as failing to report the spouse's income on the application.
2. School error, for instance, when a student's award is taken incorrectly from the Payment Schedule, or when the school pays a student who is not making satisfactory progress.

3. Required recalculations, when a student never begins attending class or withdraws from school after receiving a cash disbursement for living expenses.
4. Optional payments, for instance when the school makes an interim disbursement to a student selected for verification, but the student never completes verification.

No matter what the reason for the overpayment, it must be repaid by the student, or the school must otherwise resolve the overpayment. In addition, if the payment is the result of school error or an optional payment, the school must repay the account whether or not it succeeds in collecting the overpayment from the student.

A student who owes an overpayment on an award will be reported to the Department of Education. Any student who owes an overpayment on an award that has been reported to the Department and who subsequently submits a FAFSA will be informed that the application cannot be processed because of the overpayment, and that the student is not eligible for additional federal aid until he or she repays in full the amount owed. An EFC will not be calculated for such a student. The student's application is considered to be in a "hold file."

### **Overpayment Due to Institutional Error**

If the Financial Aid Office discovers an overpayment due to Aid Office error, the student's total award will be adjusted to compensate for the error, if possible. If not possible, DIRI will make repayment to the Pell Program and try to recover repayment from the student.

### **Overpayment Due to Incorrect Data**

If the overpayment is due to incorrect data on the SAR/ISIR, the Financial Aid Office will assist the student in correcting the SAR/ISIR. The Financial Aid Office will withhold subsequent payments until the corrected SAR/ISIR is received. If possible, the Financial Aid Office adjusts total award. If this is not possible, then the Financial Aid Office will attempt to collect overpayment from the student. If the overpayment cannot be collected in this manner, the Financial Aid Office will consult the Federal Student Financial Aid Handbook to determine if referral to the U.S. Department of Education is appropriate. If so, the student's case will be referred to the U.S. Dept. of Education Debt Collection Service (DCS) for collection.

The overpayment is due to the school's error—the school may continue to make payments to the student if the student acknowledges the overpayment in writing and agrees to repay it within six months, or if the overpayment can be eliminated within that award year by reducing the student's subsequent funding payment during the award year. Of course, the student must still meet all other eligibility criteria to receive payment.

The overpayment is not the school's fault—For instance, the student may have made a mistake on the application or the Institute may have had no information in its records indicating a student had attended another school and made an award that resulted in an overpayment. In cases such as these, the school may continue to make payments to the student if the school can reduce the student's subsequent payments to eliminate the overpayment that award year. IF THE OVERPAYMENT CANNOT BE ELIMINATED IN THIS WAY THE SCHOOL MAY NOT MAKE FURTHER PAYMENTS TO THE STUDENT UNTIL HE OR SHE COMPLETELY REPAYS THE SCHOOL. If the student will not agree to repay, the school is not liable to the

US Department of Education but make a reasonable effort to contact the student through email, US Mail, and phone calls and collect the overpayment.

Note; The Institute may not reduce a student's award from the current award year to eliminate an over award from a previous award year.

If a student repays a Pell overpayment for a prior award year, DIRI must deposit the funds in the DIRI institutional federal fund account and note the decrease in the student's award and to the Federal Pell Grant Program. The funds can then be used for current year disbursements.

The Institute must notify the Department's Debt Collection Service if it has serious difficulty in collecting an overpayment from a student.

### **Receipt of Additional Resources**

Pell Grant is an entitlement program. Pell Grant is never to be adjusted downward because a student receives additional resources during the award year.

### **Program Cancellation**

In the event the program must be cancelled, students will receive a full refund or will be able to apply all remittances to another program.

### **School Closure**

In the unlikely event that the school closes, students will receive full refunds of all remittances.

### **The Borrower Defense to Repayment Standards**

The 2016 Final Regulations established a federal standard for borrower defense to repayment applications based upon judgments against institutions, breaches of contract by institutions, and substantial misrepresentations by institutions, in 34 C.F.R. § 685.222. This standard will be applied for borrower defense to repayment claims asserted as to loans first disbursed on or after July 1, 2017.

### **The Financial Responsibility Events, Actions, and Conditions**

Among other things, the 2016 Final Regulations included revisions to the Department's regulations in 34 CFR 668.171, specifying the standards institutions must meet to be deemed financially responsible. The 2016 Final Regulations, in 34 CFR 668.171(h), require institutions to notify the Secretary within specified timeframes for any of the following events, actions, or conditions that occur on or after July 1, 2017. Cites below refer to the locations of the definitions of each event, condition, or action, which you may see in the [2016 Final Regulations](#), at 81 Fed. Reg. 76,073 to 76,074 (pages 148-149 of the linked pdf):

- *Debts, liabilities, and losses* (34 CFR 668.171(c)):
  - The institution has a debt or liability arising from a final judgment/determination (judicial or administrative proceeding) or from settlement.
  - A lawsuit against the institution is brought by a Federal or State authority after July 1, 2017, on claims related to the making of a Direct Loan or the provision of educational services, which has been pending for more than 120 days.

- A lawsuit (other than the type already noted) against the institution is brought after July 1, 2017, where summary judgment motions have not been filed under certain circumstances or the institution's summary judgment motion has been denied.
- The institution is required by its accrediting agency to submit a teach-out plan. ○ For an institution with a composite score less than 1.5, any withdrawal of owner's equity from the institution, unless the transfer is to an entity included in the affiliated entity group on whose basis the institution's composite score was calculated.
- *Non-Title IV revenue* (violation of the 90/10 requirement) (34 CFR 668.171(d)): If the institution did not derive at least 10 percent of its revenue from non-Title IV programs.
- *For publicly-traded institutions* (34 CFR 668.171(e)): Certain actions by the U.S. Securities and Exchange Commission ("SEC") or stock exchange on which the institution's stock is listed.
- *Discretionary factors or events* (34 CFR 668.171(g)):
  - The institution has received a citation by a state licensing or authorizing agency for failing state or agency requirements.
  - The institution has been placed on probation or issued a show-cause order by an accrediting agency for a failure to meet an agency standard. ○ The institution has violated a provision or requirement in a loan agreement and there has been a default or delinquency under the agreement enabling the creditor to require an increase in collateral, a change in the contract, an increase in interest rates or payments, or other sanctions, penalties, or fees.

#### Notifications of Financial Responsibility Actions, Events, or Conditions Occurring Between July 1, 2017, and the Present:

We recognize that some institutions may have had one or more of the events, actions, or conditions occur between July 1, 2017, and the date of this announcement and, in light of the delays and court orders, are uncertain about how to comply with these financial responsibility requirements.

For the majority of the financial responsibility standards addressing the debts, liabilities, and losses under 34 CFR 668.171(c), we recognize that the impact of such events will have been reflected in the institution's most recent financial statement submitted after July 1, 2017. As a result, an institution needs to submit a separate notification to the Department of the following events occurring after the fiscal year end for the most recent annual audit submission submitted to the Department:

- *Debts, liabilities, and losses*
  - The institution has a debt or liability arising from a final judgment/determination (judicial or administrative proceeding) or from settlement.
  - The institution is required by its accrediting agency to submit a teach-out plan. ○ For an institution with a composite score less than 1.5, any withdrawal of owner's equity from the institution.

For lawsuits, we will require institutions to notify the Department of:

- A lawsuit against the institution brought by a federal or state authority after July 1, 2017, on claims related to the making of a Direct Loan or the provision of educational services, which

has been pending for more than 120 days and which is still pending as of the date of this announcement.

- A lawsuit (other than the type already noted) that is still pending as of the date of this announcement against the institution and was brought after July 1, 2017, where summary judgment motions have not been filed under certain circumstances or an institution's summary judgment motion has been denied.

For non-Title IV revenue (violations of the 90/10 requirement), an institution must notify the Department 45 days after the end of the institution's first fiscal year beginning on or after July 1, 2017.

For certain actions by the SEC or stock exchange on which the institution's stock is listed for publicly-traded institutions, institutions must notify the Department of all such events occurring after July 1, 2017.

For state licensing or authorizing agency citations and accreditor show-cause orders or accreditor-imposed probation status, institutions must notify the Department of all such events occurring after July 1, 2017, unless they have been resolved as of the date of this announcement.

For violations of a requirement in a loan agreement, institutions must notify the Department of all such events occurring after July 1, 2017.

***Notifications should be sent to FSAFRN@ed.gov within 60 days of this electronic announcement.***

#### The Class Action Bans and Predispute Arbitration Agreements Provisions

The 2016 Final Regulations also included revisions to the Department's regulations in 34 CFR 685.300 covering agreements between an eligible institution and the Secretary for participation in the Direct Loan Program. Generally, these revisions include prohibitions on:

- *Internal dispute resolution* (34 CFR 685.300(d)). An institution may not compel any student to pursue a complaint based upon a "borrower defense claim" (generally, a claim that is or could be asserted as a borrower defense claim by a borrower under the Department's administrative process, see below) through an internal dispute process before the student presents the complaint to an accrediting agency or government agency authorized to hear the complaint.

The Department's administrative process allows a Direct Loan borrower to request a discharge of the borrower's loan based upon an act or omission of the institution attended by the student that relates to the making of a Direct Loan for enrollment at the institution or the provision of educational services for which the loan was provided, under standards established in the Department's regulations at 34 CFR 685.206(c) and 34 CFR 685.222.

- *Class action bans* (34 CFR 685.300(e)). An institution may not seek to rely in any way on a predispute arbitration agreement or other predispute agreement with a student who has

obtained or benefited from a Direct Loan with respect to any aspect of a class action that is related to a borrower defense claim (as defined above).

- *Predispute arbitration agreements* (34 CFR 685.300(f)). An institution may not enter into or seek to rely in any way on a predispute agreement to arbitrate a borrower defense claim (as defined above), or any aspect of a borrower defense claim, with a student who obtained or benefited from a Direct Loan.

In addition to the prohibitions above, institutions must submit certain records to the Department:

- *Arbitral records* (34 CFR 685.300(g)). An institution must submit copies of certain records in connection with any claim filed in arbitration by or against the institution concerning a borrower defense claim.
- *Judicial records* (34 CFR 685.200(h)). An institution must submit copies of certain judicial records in conjunction with any claim concerning a borrower defense claim filed in a lawsuit by the institution against the student or by any party, including a government agency, against the institution.

Because the 2016 Final Regulations are now in effect, institutions are required to implement these changes.

Nothing in these regulations prohibits an institution from having and enforcing a mandatory predispute arbitration requirement or class action ban in connection with any claim not concerning a borrower defense claim or in connection with any claim asserted by a student who is not a Direct Loan borrower. A claim is not a borrower defense claim if it is not based upon an act or omission of the institution attended by the student that relates to the making of a Direct Loan for enrollment at the institution or the provision of educational services for which the loan was provided, such as a personal injury tort claim or a sexual or racial harassment claim. The regulations, at 34 CFR 685.300(e)(3) and (f)(3), specifically note that the issue of whether a claim is “a claim regarding the making of a Direct Loan or the provision of educational services for which the loan was provided,” (*i.e.*, a borrower defense claim) is to be decided by the court.

In addition, as explained in 34 CFR 685.300(f)(1)(ii), a student may enter into a voluntary post dispute arbitration agreement with an institution to arbitrate a borrower defense claim. In other words, these regulations do not prohibit an institution from providing an arbitration process for students who have borrower defense claims, or any other claims, who voluntarily agree to arbitration after a grievance has been raised with the institution.

### **Implementation of the 2016 Final Regulations for Existing Predispute Arbitration Agreements and Class Action Bans**

We recognize that some institutions may have entered into mandatory predispute arbitration agreements or other predispute agreements addressing arbitration and class action bans between the 2016 Final Regulations’ original effective date of July 1, 2017, and the date of this announcement. Although such agreements cannot be enforced in relation to any borrower defense claim made by a Direct Loan recipient, the Department recognizes that institutions may need time to prepare new enrollment agreements that omit such mandatory predispute arbitration requirements or include the language specified by the regulations if the agreements

address arbitration and class action bans. Institutions need not issue new enrollment agreements or contracts to students who may have accepted the terms of such a predispute arbitration agreement or class action ban in an earlier enrollment agreement or contract but may instead provide written notification to those students that such agreements will not be enforced with respect to borrower defense claims for Direct Loan recipients. Therefore, institutions may do either of the following to comply with the requirements of revised 34 CFR 685.300:

- *Amend the mandatory predispute arbitration agreement within 60 days of this announcement*, to contain the language specified in 34 CFR 685.300(f)(3)(iii)(A) (see Appendix) and, if the agreement also addresses class actions or there is a separate predispute agreement addressing class actions, to contain the language specified in 34 CFR 685.300(e)(3)(iii)(A) (see Appendix);

OR

- *Within 60 days of this announcement, begin complying with the notice requirements.* Institutions may also choose, within 60 days of this announcement, to begin providing notice to students that mandatory predispute arbitration agreements will not be enforced for borrower defense claims, no later than at the point of exit counseling or the date on which the institution files its initial response to a demand for arbitration or service of a complaint from a student who has not already received a notice or amended agreement. Institutions may also achieve compliance by providing notice to all impacted students now, if they choose. The content of the notice is specified in 34 CFR 685.300(f)(3)(iii)(B) (see Appendix) as to existing predispute arbitration agreements. The content of the notice for a class action ban — whether in an existing predispute arbitration agreement or in a separate predispute agreement — is specified in 34 CFR 685.300(e)(3)(iii)(B) (see Appendix).

The regulation is clear on the requirements for predispute arbitration agreements and other predispute agreements entered into after the 60-day window provided in this announcement.

Finally, the unenforceability of predispute arbitration agreements and class action bans under 34 CFR 685.300 also applies in the context of an arbitration proceeding between an institution and a student under the circumstances described in the regulation (*i.e.*, if the proceeding relates to a borrower defense claim, as defined above and in the regulation, and the student involved in the arbitration with the institution is a Direct Loan recipient) that was ongoing as of October 16, 2018, and was initiated pursuant to a predispute arbitration agreement. A student involved in an ongoing arbitration may choose to continue with the arbitration process toward a final conclusion but has no obligation to do so under the regulation.

For institutions with arbitrations that are ongoing and not final at the time of this announcement, institutions must provide students with the notice(s) described above within 10 days of this announcement. Institutions may continue to offer voluntary opportunities for students to engage in arbitration on issues related to a borrower defense claim after a grievance has been raised, but institutions may not require a Direct Loan recipient to engage in arbitration prior to filing a borrower defense claim. Institutions may also continue to enforce mandatory predispute arbitration agreements or bans on class action suits for complaints unrelated to a borrower

defense claim; however, the court is to make the determination as to whether the claim is a borrower defense claim.

### **Submission of Arbitral and Judicial Records**

For any dispute in arbitration based on a borrower defense claim that was pending as of July 1, 2017, or initiated after July 1, 2017, a copy of the arbitral records specified in 34 CFR § 685.300(g) should be sent to [borrowerdefense@ed.gov](mailto:borrowerdefense@ed.gov).

For any lawsuit based on a borrower defense claim that was pending as of July 1, 2017, or initiated after July 1, 2017, a copy of the judicial records specified in 34 CFR 685.300(h) should be sent to [borrowerdefense@ed.gov](mailto:borrowerdefense@ed.gov).

Institutions must submit existing records no later than 90 days of this electronic announcement and must comply with the timeframes set forth in the regulations for submission of future records.

### **Repayment Rate and Financial Protection Disclosures**

The 2016 Final Regulations also added a requirement, 34 CFR 668.41(h), that for a proprietary institution that does not meet a certain loan repayment rate for the majority of its student loan borrowers, the institution must include a specified warning in its promotional materials that are made available to prospective or enrolled students. As contemplated by 34 CFR 668.41(h)(3)(i)(A), the Department will inform institutions of the form, place, and manner that the warning must appear in institutions' promotional materials in an upcoming *Federal Register* notice. Further, the Department will be engaging in consumer testing in the near future to ensure the warning is meaningful and helpful to students. As a result, institutions will be informed through future *Federal Register* notices about when and how they must provide repayment rate warnings to students in the future and of any changes to the content of the warning.

The 2016 Final Regulations also added a requirement, 34 CFR 668.41(i), that all institutions deliver a disclosure to enrolled and prospective students regarding the occurrence of certain triggering events that are indicators of financial responsibility or other events. As specified in 34 CFR 668.41(i)(2) and (3), the Department will be engaging in consumer testing in the near future to determine the triggering events for which disclosure will be required and to determine the form of the disclosure to ensure the disclosure is meaningful and helpful to students. As a result, institutions do not need to provide the disclosure to students until further notice from the Department.

### **Appendix**

To amend predispute agreements covered by 34 CFR 685.300, institutions must include the following provisions:

- For predispute arbitration agreements, under 34 CFR 685.300(f)(3)(iii)(A):

*We agree that neither we nor anyone else who later becomes a party to this predispute arbitration agreement will use it to stop you from bringing*

*a lawsuit concerning our acts or omissions regarding the making of the Federal Direct Loan or the provision by us of educational services for which the Federal Direct Loan was obtained. You may file a lawsuit for such a claim or you may be a member of a class action lawsuit for such a claim even if you do not file it. This provision does not apply to other claims. We agree that only the court is to decide whether a claim asserted in the lawsuit is a claim regarding the making of the Federal Direct Loan or the provision of educational services for which the loan was obtained.*

- For predispute arbitration agreements that address class actions, pursuant to 34 CFR 685.300(e)(3)(iii)(A):

*We agree that neither we nor anyone else who later becomes a party to this agreement will use this agreement to stop you from being part of a class action lawsuit in court. You may file a class action lawsuit in court or you may be a member of a class action lawsuit even if you do not file it. This provision applies only to class action claims concerning our acts or omissions regarding the making of the Federal Direct Loan or the provision by us of educational services for which the Federal Direct Loan was obtained. We agree that only the court is to decide whether a claim asserted in the lawsuit is a claim regarding the making of the Federal Direct Loan or the provision of educational services for which the loan was obtained.*

For institutions deciding to provide notices to students rather than amend the original predispute agreements, the notices must contain the following language:

For predispute arbitration agreements, under 34 CFR 685.300(f)(3)(iii)(B):

*We agree not to use any predispute arbitration agreement to stop you from bringing a lawsuit concerning our acts or omissions regarding the making of the Federal Direct Loan or the provision by us of educational services for which the Federal Direct Loan was obtained. You may file a lawsuit regarding such a claim or you may be a member of a class action lawsuit regarding such a claim even if you do not file it. This provision does not apply to any other claims. We agree that only the court is to decide whether a claim asserted in the lawsuit is a claim regarding the making of the Direct Loan or the provision of educational services for which the loan was obtained.*

For predispute arbitration agreements, or other predispute agreements addressing class actions under 34 CFR 685.300(e)(3)(iii)(B):

*We agree not to use any predispute agreement to stop you from being part of a class action lawsuit in court. You may file a class action lawsuit in court or you may be a member of a class action lawsuit even if you do not file it. This provision applies only to class action claims concerning our acts or omissions regarding the making of the Federal Direct Loan or the provision by us of educational services for which the Federal Direct Loan was obtained.*

*We agree that only the court is to decide whether a claim asserted in the lawsuit is a claim regarding the making of the Federal Direct Loan or the provision of educational services for which the loan was obtained.*

## **Section 13: Federal Pell Grant Program**

(See 34 [CFR 690.63](#))

## Section 14: Federal Direct Loan Program

Federal student loans have been available to students and their parents since the passing of the Higher Education Act of 1965. The loan programs have gone through several modifications and name changes over the years but have always provided for a family to borrow funds for educational expenses. The programs have also deferred interest payments on some loans until students have completed their programs of study and have had a reasonable opportunity to find employment. DIRI offers the Stafford program.

Stafford loans are available to student's borrowers and are further split into unsubsidized and subsidized loan types. The subsidized Stafford Loans are available for low-income students, while unsubsidized are generally available to all applicants regardless of income level. The terms "sub" and "unsub" are commonly used to identify each loan type, with "sub" loans have the interest paid by the Department of Education while the student is still enrolled.

Stafford loans were historically available through local lenders under the Federal Family Educational Loan Program (FFELP) until the Department of Education initiated the Direct Loan Program. The Federal Direct Student Loan (FDSL) Program began in the 1994-95-award year as a pilot program. It has steadily grown in popularity and participation since its inception and since July 1, 2010 is the only source for students to obtain Stafford loans. Prior to July 2010 loans were also available through the Federal Family Education Loan (FFEL) Program. Those loan processes involved banks and guarantee agencies but was eliminated with the Health Care Reconciliation Act of 2010 under the Obama administration.

Direct loans are no different than the historical FFEL Stafford loans in terms of student eligibility, award amounts, repayment, deferment, etc. The only difference between FDSL and FFEL was the source of funding for this program. FFEL funds are provided by lenders (banks), and the repayments of the loans are guaranteed by a guarantee agency (typically a State Authority). The federal government only needs to provide funds for the interest expenses on FFEL loans and funds to cover reimbursements of defaulted loans. Under the FDSL program, the federal government provides all capital to fund the program. Banks and guarantors are eliminated from the process under the FDSL program. This generally results in a streamlined smoother funding process. It does, however, require significant amount of additional work on the part of the school to be a Direct Loan school as opposed to a FFEL school.

DIRI processes FDSL funds in much the same way as Pell funds are processed. Student awards are electronically originated with the Department of Education. Acknowledgements are received, and funds are ultimately transferred to the school's account. Student loans are generally awarded on an academic year basis, with payments coinciding with the payment periods occurring within the loan period.

**Example:** *A student enrolls in the 731 clock-hour DIRI Basic Roling Certification program. The Institute defines its academic year as a non-standard, or less than 900 clock-hours, academic year of 731 hours. Therefore, the program may be completed in one academic year. The student may receive a prorated loan for the academic year. The award would be disbursed in two payments; one half of the loan would be disbursed for the first payment period, between*

*the first day up to 30<sup>th</sup> day of classes, and the other half for the second after 366 hours have been completed.*

Generally, a student's first loan payment may not be disbursed until 30 days of enrollment have elapsed. Future payments may be made at the beginning of future payment periods. The 30-day delay on the first payment is a regulation design to combat high default rates for students who withdraw early in their attendance.

### **Promissory Notes**

As with any loan, the promissory note is the legal, binding document or contract. Separate notes are used for the Stafford loan programs. The student must complete the note. A Master Promissory Note (MPN) is the type of note used in today's financial aid arena. Using an MPN, students need only sign a single promissory note when they enroll at the Rolf Institute. For programs of study longer than one academic year, the MPN can be used for borrowing in subsequent years of education without the need to file additional annual promissory notes. The MPN does not contain a specified dollar amount. Rather, the institution is permitted to increase a student's loan indebtedness for multiple years of training without obtaining additional prom notes from the student. A supply of promissory notes can be obtained from the Department by calling 1-800-848-0978 or visiting the Department of Education's financial aid website at [www.ifap.ed.gov](http://www.ifap.ed.gov).

Students can also execute an official Master Promissory Note electronically by completing the electronic MPN at the USDE's website <http://www.studentaid.gov/>. Filing an electronic MPN eliminates even more of the paper that was previously associated with student loan funding. Using the electronic MPN process is the preferred method of executing promissory notes for student loans.

DIRI utilizes the electronic MPN method for all students.

### **Disbursing Loan Funds**

DIRI receives processed loan awards in the same manner it receives Pell awards. Each award will be identified on a roster, or Award Journal. A borrower is responsible for any governmental origination fees that will be subtracted from the original loan amount. The net amount of each loan is what DIRI receives and will apply to a student's account at DIRI. DIRI must be sure to comply with all disbursement and notification requirements when depositing student loan awards including the 30-day delayed disbursement rules and cancellation notification rules.

The DIRI Award package will be sent out by email and will include a full explanation of the awards included. Pell Grants will be identified as "Federal Pell Grant", and Direct Loans as "Direct Subsidized and Direct Unsubsidized Loans". Additionally, the award letter will explain that grant funds do not have to be repaid and that loan funds must be repaid. All award letters will include the total amount of the award and disbursement dates. When the disbursement has been made an email will be sent to the student with the right-to-cancel disclosure language and a copy of the Right to Cancel Financial Aid form.

## **Returning Unearned Loan Funds**

In the event a borrower withdraws from DIRI, some of the loan money received by the borrower was unearned. After determining how much loan money is unearned, DIRI will return these funds in the same manner as unearned Pell Funds. Simply deposit the unearned amounts back into the DIRI federal bank account via funds transfer from the DIRI Operations account. The Director of Financial Aid will then adjust the borrower's account with the Department of Education and request that the Director of Operations & Systems Management return the funds to the Department of Education electronically via the G5 system.

## **NSLDS Enrollment Reporting**

Bi-monthly, DIRI must update student enrollment information into the federal NSLDS database. NSLDS Enrollment Reporting is done online by the FAA using their FAA User Login. The purpose of this process is to update the Department's system regarding the student's enrollment status at the school, which may initiate the repayment process on a student's loans. Generally, the enrollment roster is issued by USDE every 60 days. At such time, DIRI will need to correct any inaccurate enrollment statuses or dates in the online system. This process will repeat every two months. It is crucial that DIRI not delay in updating students' records. There is a 15-day window to complete this process on time.

## **FDSL Certification Worksheet**

The FDSL Certification Worksheet is an internal form developed by Gemcor to collect relevant information for the processing of a student's loan. DIRI continues to use this form.

This worksheet is completed for each file and provides DIRI with the necessary information to correctly originate student loans. This form is self-explanatory in most respects, however there are some issues to keep in mind when originating a student loan.

### **Question 1 – Grade Level**

Generally, the grade level represents the student's grade level at DIRI. Since a non-standard, one year, 731 clock-hour certificate program is offered in a particular occupation, the student's grade level will be "1". If a student has attended two years of college at another school prior to enrolling at DIRI, that does NOT put the student into grade level "3".

### **Question 2 – Loan Period**

The loan period should coincide with the length of DIRI's academic year, or the hours remaining for the student to complete his/her program of student, whichever is shorter.

Payments will be distributed in accordance with the payment periods during that loan period. For example, a student is enrolled in the Basic Rolfing Certification 731clock-hour program. The loan period will begin on the student's start date and end on the date the student is expected to complete 0-731 hours of the program.

## **Loan Amount Determinations**

The two boxes in this section provide for a determination of the student's eligibility for loan funds. Student eligibility is always tied into a *cost of attendance*. The cost of attendance is the amount a student will reasonably be expected to pay for his/her education during the loan

period. This includes both direct costs like tuition fees, and books, as well as indirect costs of living that will be incurred by the student while attending school. To determine eligibility for subsidized loans any other financial aid and the expected family contribution (EFC) must be subtracted from the total cost of attendance. The resulting figure represents ‘unmet need’ and is the amount a student can apply for in a subsidized loan (subject to federal annual or aggregate maximums). A similar calculation is performed to determine eligibility for unsubsidized loans except that the EFC figure is not used in these calculations. Eligibility for “unsub” loans is limited only by cost of attendance less other financial aid (subject to federal annual or aggregate maximums).

### **Verification**

Verification is a process that requires an institution to confirm the data that a student has included in his/her application for federal assistance. Generally, institutions must perform verification procedures on selected files. A file has been selected for verification if the EFC number on the SAR or ISIR is followed by an asterisk “\*”.

## Section 15: Veteran Affairs

The Director of Financial Aid, in collaboration the Director of Operations & Systems Management, at The Rolf Institute is responsible for certifying all eligible persons to receive veteran's educational benefits from the U. S. Department of Veterans Affairs (DVA). The Director of Financial Aid is authorized for veteran information on the VA Form 22-8794. This form will be updated any time a person in either position or the designee changes. The Financial Aid Officer is DIRIs' designee as the School Certifying Official (SCO) to carry out reporting requirements. The SCO is a member of Colorado Coordinators of Veteran's Affairs (NCACVA). The SCO will attend the annual VA conference for updates each year.

"GI Bill® leadership has regularly met with SCOs, school leadership, and other stakeholders to discuss how the GI Bill is administered and what programmatic changes can be made to improve the GI Bill student experience. A frequent topic during these discussions is overall SCO workload and responsibilities, and the appropriate SCO to GI Bill student ratio. With the input and feedback received from these engagements, VA is recommending educational institutions adopt a ratio of (1) full-time SCO to every 200 GI Bill students."- V/R Education Services

The Director of Financial Aid will act as a liaison for the student to receive veteran educational benefits. The Director will always refer to the U. S. Department of Veterans Affairs [School Certifying Official Handbook](#). This handbook will be kept in the office of the Veterans Services Officer and can be found on the GI Bill® website at [www.gibill.va.gov](http://www.gibill.va.gov). The Veterans Services Officer will also refer to the North Carolina Education Liaison Representative (ELR) and the State Approving Agency (SAA) for procedural updates, guidelines and information.

"GI Bill® is a registered trademark of the U.S. Department of Veterans Affairs (VA). More information about education benefits offered by VA is available at the official U.S. government Web site at [https://benefits.va.gov/GIBILL/Trademark\\_Terms\\_of\\_Use.asp](https://benefits.va.gov/GIBILL/Trademark_Terms_of_Use.asp)

The SCO Handbook is written for VA Certifying Officials and anyone at a school involved with certification of beneficiaries of VA education benefits. The Handbook is a collaboration of the four Regional Processing Offices and Education Service and is intended to be the official source of information for VA Certifying Officials.

### Veteran/Spouse/Dependent

- The Director of Financial Aid meets with the student to discuss which chapter of benefits the student is applying for.
- The Director of Financial Aid discusses the DIRI Veteran Contract and gives each potential student a VA package. The VA package lists Frequently Asked Questions for VA, DIRI regulations, general financial aid regulations and the Satisfactory Academic Progress Policy.

### DIRI Required Documents

- a) Copy of Certificate of Eligibility (COE)
- b) Copy of DD-214 (member 4) or National Guard form DD2384 (NOBE)

Because DIRI is a Non College Degree (NCD) School, students using Chapter 33 VA Education Benefits will exhaust between 12 and 12 ½ months for this program. For more information contact the VA Education Benefits Hotline at 888-442-4551.

*Note: Only students attending the 731-hour Basic Roling Certification Program in Boulder, CO are eligible to use their Veteran's Education Benefits.*

### **Certification Process**

1. Create a file folder for the student
2. Send letter, email or telephone any student with missing required information
  - VA Transcript Evaluation
    - a) Email sent to DIRI Admission's Office.
    - b) Student transcripts evaluated on present program of study.
  - Copy of Schedule (each phase receiving benefits)
  - Evaluation (each phase receiving benefits)
    - a) Ensure all registered courses are in the program of study (EVAL).
    - b) Confirm with the DIRI Education Catalog.
    - c) Inform the student by letter, e-mail and/or telephone with any issues.
  - Enrollment Verification (each phase receiving benefits)
    - a) Use VA-Once (mandated as of 08/01/12).
    - b) Refer to the Quick Reference Flip Book, the ELR, and the Handbook for Directions.
    - c) Director of Financial Aid refers to the chapter of benefits the student is receiving.
  - Scan the current documents

### **MyCAA**

The Rolf Institute is an approved "Military Spouse Career Advancement Accounts (MyCAA)" school. The MyCAA Program is an employment assistance program that provides up to \$4,000 of financial assistance to eligible military spouses who are pursuing a license, certification or Associate Degree in a portable career field and occupation.

Visit <https://myseco.militaryonesource.mil/portal/> for more information on how to apply.

*Note: Only students attending the 731-hour Basic Roling Certification Program in Boulder, CO are eligible for the MyCAA Program.*

## Section 16: Colorado Department of Labor and Employment

The Rolf Institute is approved by the Colorado Department of Labor and Employment to provide services to clients of the Division of Vocational Rehabilitation (DVR). Only the Basic Roling Certification Program offered solely in Boulder, Colorado is eligible for benefits.

The Director of Financial Aid is responsible for certifying all eligible persons to receive vocational rehabilitation benefits from the State of Colorado. An invoice is submitted to the Colorado Department of Labor and Employment online via [State of Colorado Secure Email Portal](#). The Director of Financial Aid will then receive an Authorization Statement from the State and will receive an EFT notification 3-5 days prior to funds being received in the institute's Operations Account.

The Director of Financial Aid will act as a liaison for the student to receive educational benefits.

For general inquiries email [CDLE\\_voc.rehab@state.co.us](mailto:CDLE_voc.rehab@state.co.us).

## Section 17: Alternative Funding Sources

Because Federal aid amounts are limited (Independent borrowers may be eligible for up to \$7,716 in loans while Dependent borrowers may be eligible for \$4,467), students can apply for private student loans through many outside sources to help alleviate some of their balance.

These funds can be applied to any of the three phases.

### Alaska Commission on Postsecondary Education (ACPE)

[http://acpe.alaska.gov/FINANCIAL\\_AID/Loans/Alaska\\_Supplemental\\_Education\\_Loan](http://acpe.alaska.gov/FINANCIAL_AID/Loans/Alaska_Supplemental_Education_Loan)

- Open to residents of Alaska
- Approval amounts up to \$10,000

Payments are sent to the school directly via check which must be endorsed by both the student and the school.

### Wells Fargo Education Services

<https://www.wellsfargo.com/jump/student-loans/student/>

- No payments required while in school
- Potential discounts to lower your interest rate
- Competitive interest rates
- There are no application, origination, or late fees, and no penalty for paying off your loan early
- Applying with a cosigner may improve approval odds.
  - Co-signer release available.
  - [Find out more about cosigners.](#)
- Approval amounts up to \$15,000

Payments are sent to the school directly via check which must be endorsed by both the student and the school.

### AmeriCorps

<https://my.americorps.gov/mp/login.do>

Payments are sent to the school via EFT funds transfer.

### New Jersey Higher Education Student Assistance Authority (HESAA)

<https://www.hesaa.org/Pages/NJGrantsHome.aspx>

- Open to residents of New Jersey

### Vermont Student Assistance (VSAC)

<https://www.vsac.org/>

- Open to residents of Vermont

Payments are sent to the school via EFT funds transfer.

## **Section 18: Title IV Fraud**

### **Student Fraud**

In reviewing reports, appeals, or in other secondary review of files, discrepancies may arise. Discrepancies in student application materials (i.e. income, citizenship, name, SSN, signatures) must be investigated and resolved. To do so, the Financial Aid Office will contact the student to request additional information and documentation. If, in the Financial Aid Officer's judgment, there has been intentional misrepresentation, false statements, or alteration of documents which have resulted or could result in the awarding or disbursement of funds for which the student is not eligible, the case shall be referred to the Director of Faculty & Student Services and/or the Executive Director for possible disciplinary action.

The Director of Faculty & Student Services will review the student's Aid file with the Director of Financial Aid and if the decision is made by the committee to pursue the possibility of denying or canceling financial aid, the Director of Financial Aid will contact the student to set up an appointment. If the student does not make an appointment, the Director of Financial Aid may:

1. Not process a financial aid application until the situation is resolved satisfactorily
2. Not award financial aid
3. Cancel financial aid
4. Determine that financial aid will not be processed for future years.

Students who willfully submit fraudulent information will be investigated to the furthest extent possible. All cases of fraud and abuse will be reported to the proper authorities. After investigating the situation, if the Officer believes there is a fraudulent situation, he/she will refer all information to the Department of Education's (ED's) Office of Inspector General (OIG). The student may also be referred to the SSPP judicial process.

### **Institutional and Third-Party Fraud**

The Rolf Institute's compliance policy, including how reports of suspected fraud are handled, may be requested from the Executive Director: Under the American Recovery and Reinvestment Act of 2009 (ARRA), nonfederal employees who report waste, fraud or abuse connected to the use of ARRA funds may not be discharged, demoted or otherwise discriminated against because of his or her disclosure.

# Appendices

## Appendix A: Resources

### *Federal Student Aid Office of the US Department of Education*

- US Department of Education, Financial Student Aid Office <https://ifap.ed.gov/ifap/>
- Complete FSA Handbook is available at <https://ifap.ed.gov/fsahandbook/attachments/1617FSAHbkActiveIndexMaster.pdf>
- FAFSA on the Web is an essential for applying for federal grants, loans, and work-study costs nothing! More than 21 million students used the Free Application for Federal Student Aid (FAFSA) last year, and many of them apply online at [www.fafsa.web.ed.gov/](http://www.fafsa.web.ed.gov/) FAFSA on the Web.
- Visit [www.StudentAid.ed.gov](http://www.StudentAid.ed.gov) for complete information on receiving federal financial aid for college. The Federal Student Aid Information Center helps students complete the FAFSA and provides the public with free information about our programs. Call 1-800-4FED-AID to speak to a specialist about the programs.
- The Information for Financial Aid Professionals website at [www.ifap.ed.gov/ifap.index.jsp](http://www.ifap.ed.gov/ifap.index.jsp) is an indispensable source of guidance for financial aid administrators, auditors, and others who are involved with the Federal Student Aid Programs. You will find Dear Colleague Letters, electronic announcements, the FSA Handbook and other publications, and much more.
- Information on Gainful Employment final regulations can be found at <https://ifap.ed.gov/GainfulEmploymentInfo/indexV2.html>
- List of Dear Colleague Letters can be found at <https://ifap.ed.gov/GainfulEmploymentInfo/GEDCLandEAV2.html>
- The Direct Loan Program provides loans for students and parents from the Department of Education. The Direct Loan website at <https://www2.ed.gov/offices/OSFAP/> offers information, tools, and links to other sites pertinent to Direct Loans.
- Also, for financial aid professionals is the Postsecondary Education Participants System or PEPS. At the PEPS website at <https://www2.ed.gov/offices/OSFAP/PEPS> you'll find reports of closed schools, the Case Management and Oversight weekly institutional updates, and other information.

## Appendix B: DIRI Financial Aid Forms and Applications

- 1.0 Intent to Apply for Financial Aid/ Veteran's Education Benefits
- 2.0 Free Application for Federal Student Aid ([www.fafsa.gov](http://www.fafsa.gov))
- 3.0 Entrance Counseling ([www.studentaid.gov](http://www.studentaid.gov))
- 4.0 Exit Counseling ([www.studentaid.gov](http://www.studentaid.gov))
- 5.0 Direct Loan Master Promissory Note ([www.studentaid.gov](http://www.studentaid.gov))
- 6.0 PLUS Master Promissory Note- if applicable ([www.studentaid.gov](http://www.studentaid.gov))
- 7.0 PLUS Pre-Approval Form (For Parent Loan for Undergraduate Students)
- 8.0 Institutional Student Information Report (ISIR)
- 9.0 Verification Worksheets
- 10.0 Certification of unsuccessful attempt to obtain verification of non-filing from the IRS
- 11.0 Unusual Enrollment History Form
- 12.0 C-Code comment 399 Resolution Worksheet
- 13.0 Request for Status Information Letter
- 14.0 Failure to Register for Selective Service Determination Form
- 15.0 Low Income Clarification Form
- 16.0 Award Notification Letter
- 17.0 Cost Breakdown Analysis
- 18.0 Financial Aid Emails
- 19.0 FDSL Certification Worksheet
- 20.0 Authorization to Hold a Credit Balance- Student
- 21.0 Professional Judgment Appeal Form
- 22.0 Professional Judgment Worksheet
- 23.0 In-School Deferment Form
- 24.0 Financial Aid File Checklist
- 25.0 VA Benefits Checklist
- 26.0 SAP Calculation Worksheet
- 27.0 Learning Plan Form
- 28.0 SAP Appeal Form
- 29.0 Admissions Process Online
- 30.0 Roling SI Basic Training Enrollment Agreement
- 31.0 1098-T Form
- 32.0 Payment Plan Form
- 33.0 FERPA Release Form
- 34.0 Cohort Change Request Form
- 35.0 Leave of Absence Form
- 36.0 Withdrawal Form
- 37.0 Federal Return to Title IV (R2T4) Form
- 38.0 Institutional Refund Calculation Form
- 39.0 Refund Notification Form
- 40.0 Post-Withdrawal Disbursement Authorization Form
- 41.0 Financial Aid Cancellation
- 42.0 Exit Counseling Guide
- 43.0 Reinstatement Form

## **Appendix C: Title IV, HEA Program Participation Agreement**

- 1.0 ECAR 2010
- 2.0 PPA Renewal 2012
- 3.0 Title IV Approval Letter 2013

## **Appendix D: DIRI Education Catalog and Student Handbook**

1.0 Rolf Education Catalog 2019 v1

2.0 Student Handbook

## **Appendix E: Financial Aid Policies and Procedures Tracking Document**

## **Appendix F: EdExpress Procedures**

## **Appendix G: G5 Procedures**