The Rolf Institute
Financial Aid Policies and Procedures
2017-2018
The Vision of the Rolf Institution of Structural Integration is...

to bring the benefits of Rolfing® Structural Integration to the world. This goal is accomplished through providing a quality training program in Rolfing Structural Integration, certifying Rolfers™ and providing them with continuing education, promoting research and educating the public about the value of Rolfing SI.

The Mission of the Rolf Institute of Structural Integration is...

- To select, train, and certify qualified and competent practitioners of Rolfing Structural Integration.
- To provide continuing education for Certified Rolfers.
- To promote programs of research in Rolfing Structural Integration.
- To educate the general public concerning the principles of structural
  Integration and the useful and beneficial nature of Rolfing Structural Integration.

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 Rolf Institute of Structural Integration, distinguishing "Rolfing" from all other forms of structural integration. RISI is the sole owner of the trademark "Rolfing", the brand and all its derivatives.
INTRODUCTION

The Rolf Institute of Structural Integration 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’ future. 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 The Rolf Institute of Structural Integration (RISI) and have made it increasingly important that the functions of student financial aid administration be defined and published. Additionally, it is necessary for RISI 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 Financial Aid staff with current policies and procedures that pertains 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 1.0: FAPP Philosophy, Purpose, and Development

1.1 General Contact and Operating Information for the Rolf Institute of Structural Integration
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: 8:30 to 4:30
Telephone Number: 303-449-5903
Fax Number: 303-449-5978
Email Address and Extension:
Office Manager  info@rolf.org  x100
Office of Financial Aid  aclifton@rolf.org  x107
Office of Educational Services  cberkley@rolf.org  x105
Executive Director  chowe@rolf.org  x103
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 Rolf Institute of Structural Integration (RISI) to award federal financial aid in accordance with federal regulations and guidelines pertaining to the type of assistance requested.

The Financial Aid Office at RISI is aware that each student’s aid eligibility may differ and 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 Rolf Institute of Structural Integration 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, RISI, Financial Aid Office will follow the procedures:
1. Assist and educate students in completing a Free Application for Federal Student Aid (FAFSA) application, forms and documents accurately and submit them in a timely manner.

2. RISI financial aid office will assist students in seeking other financial aid resources available for students.

3. Financial aid will, in an ethical manner, make every effort to meet the demonstrated needs of all students at RISI, 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 the Institute of Rolfing Structural Integration. This record 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. RISI 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 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 Office, Accounting Office, faculty and staff by gathering and disseminating information about student to the aforementioned office.

10. Work with agencies outside of RISI 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 the purpose of informing and fostering an understanding of the complexity and operation of the FAO, for FAO staff as a referral guide to assist in maintaining consistency in the problem-solving process, and as an important component of a comprehensive training program.

The Financial Aid Policies and Procedures (FAPP) Manual is developed by the RISI 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 RISI administration – including the Executive Director, the Chief Financial Officer, the Director of Faculty and Student Services, and the Director of Financial Aid – and are approved by the Board of Directors. The RISI 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. In order 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 RISI 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 RISI MembeLeap System, with dates for the revision noted in Appendix D of FAAPP Manual. The RISI 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 RISI 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 RISI 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 RISI 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 supervising and evaluating the Director of Faculty and Student Services in the implementation of RISI policies.

**Director of Faculty and Student Services:** Responsible for supervising and evaluating the Director of Financial Aid and the Admissions Officer/s and ensuring that RISI policies are fully understood and implemented. 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 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 a number of 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.

In particular, the Executive Director, Director of Faculty and 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, RISI staff must maintain access to IFAP (see 668.16(o) 2013-14 FSA Handbook, pp 2-46 to 2-47). 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 Financial Aid Office forms. The processing time for most financial aid forms is two weeks. The Office of Financial Aid requires approximately two weeks from the date the document is submitted, provided the student's file is complete and ready for processing.

1.0 Free Application for Federal Student Aid (www.fafsa.gov) Release of Information
2.0 Entrance Counseling (www.studentloans.gov)
3.0 Exit Counseling (www.studentloans.gov)
4.0 Direct Loan Master Promissory Note (www.studentloans.gov) PLUS Loan MPN (www.studentloans.gov)
5.0 Verification Worksheets
6.0 FDSL Certification Worksheet
7.0 Unusual Enrollment History Form
8.0 Appeal Form
9.0 FERPA Release Form
10.0 Authorization to Hold a Credit Balance- Student
11.0 SAP Determination Form
12.0 Low Income Statement Form
13.0 Professional Judgment Appeal Form
14.0 In-School Deferment Form
15.0 Leave of Absence Form
16.0 Admissions Packet
17.0 Enrollment Agreement Form
18.0 Reinstatement Form
19.0 Refund Calculation/Withdrawal Form
20.0 R2T4 Form
21.0 Refund Notification Form
22.0 Learning Agreement Form
23.0 Financial Aid Checklist
24.0 Financial Aid Cancellation

1.7 Data on Number of Students Receiving Financial Aid
[Revision and update for 2014-2015 forthcoming]
Current Student Enrollment: 43 (2013-2014)
% Students Receiving Title IV: 50 % (2013-2014)
Title IV Participation G5/COD: 2012-2013 Award Year
Federal Pell Grant $24,695
Direct Subsidized Loans $38,629
Direct Unsubsidized Loans $83,275
Default Rate FFEL/DL
2011 0.0%
2010 0.0%
2009 0.0%
Section 2: Administrative Organization & Office Management

2.1 Administrative Capacity

Adequate Checks and Balances
The Rolf Institute of Structural Integration contracts with Gemcor, Inc., as a third-party service provider is responsible, upon USDE approval, to disburse Title IV funds to students. This section of the RISI FAPP is adapted from the Gemcor Client Manual, 2016-2017.

The flowchart below represents a general overview of how The Rolf Institute’s HEA, Title IV federal student financial assistance funds are processed using Gemcor’s services. The process starts with the submission of a student’s Free Application for Federal Student Aid (FAFSA) to the Department of Education’s Central Processing System (CPS). This FAFSA will result in an Institutional Student Information Record (ISIR), which is the core document necessary to award any federal financial aid. After receipt of ISIRs into the Gemcor TEAM Software System, RISI man then initiate Pell and Direct Loan award requests in the EAM System. Gemcor extracts award requests from TEAM daily, and processes the necessary electronic reports to secure approval of RISI student awards from the COD/USDE.

Upon receipt of USDE approval, RISI receives Daily Award Journal reports from Gemcor containing approved student award information. At this time, RISI will disburse these funds to students by crediting their accounts with the amount of their awards per the journal. The federal funding necessary to cover the disbursements made by RISI each day are electronically deposited by Gemcor into the RISI federal funds bank account by the USDE contractor. At that point, RISI transfer the total amount of the daily awards per the journal from the School’s federal aid account into the RISI operating account. The RISI accounting department is required to record the date correct COD/USDE date into the RISI student ledger accounts. Federal funds do not flow through Gemcor at any point. All federal dollars for eligible student awards are sent directly to the Rolf Institution by the USDE cash management system known as “G5”.

(See Gemcor Client Manual, Award Processing Overview)
The Rolf Institute cannot subcontract its fiduciary duties for the administration of federal student financial aid programs to an outside agency, including third-party service companies. The Rolf Institution, therefore, remains responsible for the proper administration of Title IV program awards. The relationship between the Institution and Gemcor is one that provides for support services, including consulting, data processing, reporting, and reconciliation but each organization maintains an obligation to act as a fiduciary regarding the administrative functions within the control of that organization. Each user who accesses the Gemcor TEAM Software System must have a unique profile and level of authorization correlative with their responsibilities for administering financial aid, and the level of requisite skills and knowledge.

The following list is not all-inclusive, but serves as an overview of roles and responsibilities necessary to cover all areas necessary for ensuring administrative capacity in administering financial aid awards and disbursements.
The Rolf Institute of Structural Integration 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 academic progress documentation
- Confirmation of student eligibility
- Disbursement of federal student aid to eligible students
- On-campus staff management
- Withdrawal determinations and calculations
- Placement and enrollment reporting
- Protection of Personal Identifiable Information (PII) from unauthorized access

Gemcor, Inc. Responsibilities:

- Consulting and advisory services in areas related to federal student aid administration
- Provide unlimited use of its web-based Title I Electronic Awards Management System (TEAM)
- Regulatory and procedural training in areas of federal aid administration
- Unlimited general daily technical support and Q & A regarding federal aid administration
- Electronic transfer of CPS data (student SIR information) for the Institution
- Verification and C code file review if necessary
- Determination of program eligibility and academic year definitions
- Determination of recipients’ Title IV award amounts and resulting award letters
- Report to the USDE, Title IV disbursements made by the Institution to eligible recipients
- Initiate electronic transfers of Title IV funds to the Institution for disbursement to students by the Institution
- Reconciliation of student award information I COD with G% cash accountability
- Reconciliation of Title IV funds activity with the Institution’s monthly federal funds bank account statement
- Obtain additional confirmation of student eligibility from the Institution for Title IV disbursements
- Periodic reviews of sampled student files in accordance with federal regulations
- Prepare and submit annual FISAP reports
- Gemcor staff management
- Protection of personally identifiable information (PII) from unauthorized access

Main functions involved in the efficient and accurate administration of federal student aid program funds are performed through a combination of processes between the Institution and Gemcor, Inc. Both agencies are required to have adequate staffing, effective communication, and strong internal controls to ensure administrative compliance.
2.2 Separation of Duties

Financial Aid Positions & Responsibilities

The Financial Aid Office
The Financial Aid office employs two (2) Full-time employees on the Rolf Institute Campuses, 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 Financial Aid Officer are to assemble and maintain student aid records, assess eligibility of applicants for aid, authorize aid, and complete federally mandated reports and design and implement 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
- Verifying application data on selected applicants
- Calculating student Pell Grant and Direct Student awards
- Collecting progress reports for satisfactory 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 Manual
- Preparing Federal Title IV Reports
- Other general office duties

Offices for Educational Services
The Educational Services Office employs four (4) employees including one full-time (1) Director of Faculty and Student Services, one (1) full-time Registrar, one (1) part-time Placement Officer, and one (1) part-time Clinic Coordinator.

Primary Responsibilities of Educational Services
The offices of Educational Services oversee all of 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 Educational Service Personnel

The Director of Faculty and Student Services
- Supervises the Registrar and the Director of Financial Aid.
- Reporting to Division of Occupational Private Schools
• Responsible to finalize the Academic Calendar for each year.
• Responsible for issuing Faculty Contracts and Payroll requests to Accounting Office
• Responsible for Purchasing Classroom Supplies
• Ensures students fill out Student Evaluations
• Approves student Leave of Absences
• Monitors all students on Academic Plans
• Notification to students regarding Satisfactory Academic Progress (SAP), including issuing formal SAP warnings, suspensions, reinstatements.
• Oversees any SAP appeal processes.

The Registrar
• Responsible for overseeing the admissions process and registration of students into each phase of the program.
• Validating student attendance and ensuring that faculty formally approve summary attendance documents.
• Responsible for ensuring that students who withdraw complete a documented “withdraw” form, and for notifying the Financial Aid Office.
• May take and document student deposits and tuition payments.
• The registrar coordinates with the Director of Faculty and 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 Placement Officer
• Responsible for aiding the Financial Aid Office in completing Gainful Employment Reports.
• Responsible for issuing an annual survey of all graduates regarding placement.
• Responsible for providing annual placement data to accrediting agency

The Clinic Coordinator
• Responsible for securing community clients for the classroom clinics.

Third Party Service Providers

Gemcor, Inc.
400 Quadrangle Drive Bolingbrook, Illinois 60440.
Mr. Donald R. Grybas, President
E-mail: don@gemcorinc.com
Phone: 888-GEMCOR-8

Primary Responsibilities of Gemcor, Inc.:
Gemcor, Inc. is a third party service provider that provides consulting and data processing services to assist schools in the administration of financial aid programs, including Federal Pell Grant Program and Federal Direct Student Loan Programs, using accepting accounting and federally mandated program procedures. The Rolf Institute has a contractual relationship with Gemcor, Inc. that is approved by the RISI Board of Directors. Both Gemcor and RISI are “jointly and severally” liable for the administration of financial aid at the Institute, while each having separate and distinct roles and responsibilities.
Specific Responsibilities of Gemcor, Inc.:

1. Review verification and “C” code material ion ISIRs containing verification or “C” oide flags in accordance with federal guidelines except when the Institute approves such files under its own authority.
2. 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.
3. Initiate requests for the electronic transfer of Title IV fund into the Institute’s federal funds checking account for the purpose of disbursement of said funds to eligible students by the Institute.
4. Monitor an individual federal checking account for the Institute including sequential transaction numbers for tracking and audit trail purposes as well as reconciliation of the account’s monthly statements.
5. 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.
6. Update and alert the Institution of changes in federal regulations and statues, which affect the programs covered under this agreement, through seminars, newsletters special bulletins, and electronic mail.
7. Provide the Institute with access to, and use of, Gemcor’s TEAM Software System for the purposes of packaging and maintenance of student awards for the financial aid programs offered through the Institute.
8. Transmit Electronic corrections of ISIR data to the Central Processor if the Institute uses Gemcor’s destination point for ISIR correction transmissions.
9. Provide the Institute with training and support regarding compliance with the requirements of the NSLDS Enrollment Reporting process.
10. Assist the Institute in responding to audits or federal program reviews of the programs covered under the agreement between the Institute and Gemcor.
11. Prepare and file the Institute’s annual Fiscal Operations Report and Application for Funds (FISAP) with data supplied by the Institute and from Gemcor’s internal records.
12. Perform periodic sampled file reviews of recipient information in accordance with federal regulations.
13. Provide the Institute, upon its request with TRAX Student Records Tracking System Software, including unlimited technical support, maintenance, and non-customized upgrades allowing the Institute to license and use said software for the computerized management of on-campus student records, a separate use license is required for each campus operated by the Institute.
14. Have an internal control audit performed on Gemcor’s systems and on the compliance of its procedures with federal regulations. A Certified Public accounting firm will perform such audit annually.

AcctTwo, Inc. Accounting Service Provider

RISI 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) part-time Chief Financial Officer, one (1) part-time Senior Accountant, one (1) Implementation specialist, one (1) payroll clerk.
Primary Responsibilities of AcctTwo:
The CFO of AcctTwo is responsible for transferring funds moved to the RISI Financial Aid account by Gemcor and for all RISI General Ledger accounting functions including payroll, accounts payable, accounts receivable, monthly/quarterly/annual financials and annual audit coordination.

Specific Responsibilities of AcctTwo:
Specific duties forthcoming

2.3 General Financial Aid Office Administration

Clock-hour schedule for Financial Aid Activities

731 Clock-hour Program: Maximum Time Framework 33 weeks
Payment Period One 0-365.5 Clock hours
Payment Period Two 365.5-731 Clock hours
SAP Review 218 Hours Phase I Cumulative Score
366 Hours Phase II Midterm Cumulative Score

600 Clock-hour Program: Maximum Time Framework 27 weeks
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

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 and Student Services review the correspondence. This allows the Executive Director/ Director of Faculty and 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 “Mary”. May I help you?). Typically, the Financial Aid Administrators receive incoming calls from the Office Manager. If an Administrator is unavailable, the call is routed to the Registrar or Director of Faculty and Student Services. 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 weekly on Tuesdays 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. Additional meetings may be called at the discretion of the Director of Faculty and Student Services

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 Rolf Institute of Structural Integration (RISI) 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 and 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 actually 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 located in the main Financial Aid office of the Rolf Institute, in Boulder, CO. The Financial Aid Officer 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 Financial Aid Officer. Application materials become the property of the Rolf Institution 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 form the Office of Financial Aid. Students must complete and sign the Release of Information Authorization form in the Office of Financial Aid 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
(Note: this section is taken from the 2016-17, Gemcor Client Manual, Section 11, 11.1)

Federal Cash Management
Federal Regulations prohibit institutions from maintaining excess federal cash on hand. The Gemcor systems and policies have been calibrated to prevent this situation. Gemcor 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. Gemcor’s cash management policies are also substantially similar to the U.S.D.E.’s required processes under the heightened cash monitoring method of
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 daily basis, cash is requested through the G5 website system by Gemcor for RISI 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. Federal funds are never received or handled by Gemcor in any way. Gemcor simply initiates the transfer of funds from the USE directly into the institution’s federal funds bank account based on disbursements that the institution is making to eligible students on a given day. Upon receipt of those funds into the RISI federal funds bank account, the RISI 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 RII general operating account. The Gemcor systems are designed such that a condition of excess cash maintenance should never occur. In any event, occasionally auditors may still attempt to cite for excess cash maintenance due to an incorrect interpretation of cash management regulations. If this is the case, the RISI financial aid or Accounting department should contact the Gemcor Accounting Department which will provide suggested responses. To further ensure cash accountability and strict compliance with fiscal responsibility obligations the following daily, weekly, monthly, and annual reconciliations are performed by Gemcor.

**Daily Functions**

Gemcor processes federal financial aid awards on a daily basis. Upon receipt of disbursement or refund information from RISI, federal award origination and disbursement records are submitted electronically to the Common Origination & Disbursement (COD) System. Origination and disbursement acknowledgements are received and processed through Gemcor’s internal system and are reconciled against the Institution’s federal cash general ledger. After the COD approved daily awards have been recorded, Gemcor will request the necessary funds for these awards using the cash management policy identified above. As part of the daily cash request processes, RISI 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. Gemcor staff reviews any student award that has not been accepted by COD in that day batch, and corrective action is taken to resolve the status of the award. Federal cash is not requested for any student awards that have not been accepted by COD. A Daily Award Journal is prepared for RISI listing the students and amounts of COD accepted disbursement records. These Daily Award Journals are emailed to the Institution during the morning hours for reconciliation with student’s tuition ledgers. RISI 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 reported to Gemcor 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 Gemcor will reconcile RISI’s federal funds bank account with the general ledger to ensure accurate cash accountability. In the event bank service charges are assessed to the Institute’s federal funds account, RISI will be responsible to pay for those fees. Gemcor recommends that the Institute maintain a sufficient amount of institutional funds in the federal account as a source for payment of these service fees or instruct the bank to assess service fees to another account maintained at that bank.

Gemcor also receives FDSL account statements from the department each month reflecting loan cash and disbursement activities for the Institute. These reports are reconciled against our 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 roster or 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 our student loan borrowers. Gemcor will send regular reminders to RISI when the enrollment roster is available for update. The deadline for RISI to update information on this bi-monthly roster is only 15 days. Gemcor will assist with training regarding updating the roster data through the NSLDS Professional Access website. Completion of the report requires data from the institution and Gemcor. Gemcor requests the necessary information each year in August and, with the receipt of information required from the Institution, is responsible for the timely filing of the FISAP report.

**Annual Functions**

On an annual basis, all Title IV program activity for all federal awards in Gemcor’s systems is reconciled with the department’s COD and GAPS systems. Our staff completes “Audit Packages” for each institution, 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. Each year when RISI schedules its annual audit, it will notify Gemcor for preparation of the audit packages. Gemcor also has an annual compliance audit performed on its administration of federal aid program funds for the institution. Gemcor will also annual 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**

*(See Gemcor Client Manual, Section 8.3)*

RISI Title IV funds flow thorough a special escrow checking account set up by the Institution. The title of this account reflects the Institutions 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 RISI and should be reimbursed to the account. It is recommended that RISI 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 Gemcor to cover award checks processed on a daily basis. Gemcor will maintain the integrity of this account as part of the full service administration. The Gemcor Accounting Department routinely reconciles the RISI federal student aid bank account on a monthly basis. Gemcor requests that the bank mail the statements on the RISI federal aid account directly to the Gemcor office. Gemcor reserves the right to suspend processing for any client who is delinquent in submitting bank account statements on a timely basis.

**Federal Reporting**
The Gemcor 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 on a daily basis as RISI awards funds to students. This practice of daily origination and disbursement record submissions ensures continual flow of authorization adjustments.

The Gemcor office, from the Department, receives electronic acknowledgements of these reports. These results are compared to data submitted for every student to ensure accurate and timely Pell and Direct Loan payment data reporting. The RISI authorization levels are monitored on a daily basis 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 RISI federal aid program.

**Audits**
To ensure operational integrity, to minimize costs of having federal aid programs audited, and to comply with federal legislation, Gemcor has a formal audit performed on its internal control procedures on an annual basis. This audit will be provided free of charge upon request. A CPA, when auditing federal aid program activity, can rely on Gemcor’s audit of internal controls. This prevents him/her from having to travel to Gemcor’s offices to audit policies and should keep RISI audit costs low.

For each fiscal year, RISI 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 six months of the end of RISI’s fiscal year. These audits are very unique and require the experience of professionals who have a history of performing Title I compliance and financial audits. Gemcor can provide referrals.

Audits are time-consuming processes, and the Gemcor office will need time to professionally prepare the Institute’s “audit package” so that it is at RISI when the auditors are performing their examination.
Section 3: Satisfactory Academic Progress Policy

3.1 Introduction
The Rolf Institute of Structural Integration 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 Post-Graduate Basic Rolfing Certification program (“Post-Graduate”) 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.

In addition to required instructional clock hours in the classroom, both programs include scheduled breaks between each phase when students are expected to study, practice, and integrate specific skills. Basic students, not in the Post-Graduate program, are expected to log a total of 50 hours of *Skillful Touch* between Phases I and II. Additionally, both programs require students to write an essay and to submit the completed work to their Phase II teacher. Between Phase II and III, students in both the Basic and Post-Graduate programs are expected to write a paper and to develop a draft of their business plan and to submit the completed work to their Phase III teacher. Failure to complete these requirements with a passing grade (70%) will affect the final grade for the phase in which the requirements are due, and may affect the student’s overall Satisfactory Academic Progress in the program.

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
To remain eligible for all types of financial aid, students enrolled in either of the Rolfing Certification programs must meet the requirements below:

- Be enrolled as a full-time student in each of the three phases of the program. (Note: The Basic and Post-Graduate 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 Clock hours
- Payment Period Two: 365.5-731 Clock hours
- SAP Review: 218 Hours Phase I Cumulative Score
  366 Hours Phase II Midterm 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

### 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, thirty days after the start date for the program for any student who has not previously received financial aid, or one week after the start date of the first day of the phase for students who have previously received financial aid. The second disbursement is issued at the midpoint of the program, during Phase II, after satisfactory completion of 366 clock hours for the 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 366 clock hours for the Basic Program.

### 3.5 Maximum Time Framework

**Pace 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.

\[
Pace = \frac{\text{Cumulative number of weeks/clock hours for each phase the student has successfully completed}}{\text{Cumulative number of weeks/clock hours for each phase the student has attempted}}
\]

**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 Post-Graduate 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.

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.

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.

3.7 Attendance Standard
Due to the intensive and experiential nature of the Rolfing® 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.

Reinstatement
If a student voluntarily withdraws or is administratively withdrawn from the program and wishes to return within two years, he/she will have 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.
3.8 Academic Standard

Grading Scale
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 conclusion 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

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 Post-Graduate 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 of time, 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 RISI 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 U.S. 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 and 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.

3.10 Transfer of Credits
RISI may accept transfer credit hours for phases completed in other International Rolfing Schools. However, RISI may only issue a COMTA “accredited” Certificate to students who have completed all credit hours in the U.S. RISI program in Boulder, CO. All other students, who transfer from a Rolfing International school will receive a “non-accredited” Certificate. Students who transfer from RISI to any international school will need to formally “withdraw” from the US RISI program and be enrolled in the Rolfing International Program. Students with financial aid who withdraw from the RISI 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. RISI does not accept any transfer of credits from any other Structural Integration Program, certification or degree program. All components of the RISI Basic and Post-Graduate programs must be completed for certification through the Rolf Institute or one of its affiliated international schools.

3.11 Failure to make Satisfactory Academic Progress
Financial Aid/SAP Warning
If a student fails to meet any of the quantitative or qualitative standards for Satisfactory Academic Progress, he or she will be placed on warning for the next evaluation period. The student is eligible for financial aid while on warning during the payment period in which the warning was issued.

Students will be notified in writing when they are placed on academic warning and the steps necessary to be removed from warning status. Students will also receive attendance or academic counseling from the Director of Faculty and Student Services or faculty as appropriate, when they are placed on warning.

The written warning will outline the steps needed to complete the program including the quantitative and qualitative SAP requirements that must be met by the student. Written warnings may include a requirement that a student repeat a Phase for which they fail to maintain a C average (70%), or in borderline 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.
Financial Aid Suspension Status
Failure to achieve Satisfactory Academic Progress, including all progress, pacing and academic requirements stipulated in the Academic Plan, at the end of the Financial Aid Warning period will result in student being placed on Financial Aid Suspension and/or administrative withdraw. The institution will notify a student by certified mail if he or she is being administratively withdrawn for unsatisfactory academic progress.

A student on Financial Aid Suspension status will not receive federal or institutional financial aid. A student who has been placed on Financial Aid Suspension may appeal this status.

Financial Aid Appeal Process
The student may submit a written appeal of his/her dismissal within five calendar days of their receipt of the dismissal notice. The appeal must be accompanied by documentation of the mitigating circumstances that have prevented the student from attaining satisfactory academic progress and evidence that changes have occurred to allow the student to now meet standards of satisfactory academic progress.

The Director of Faculty and Student Services, will assess all appeals, and determine whether the student may be permitted to continue in school on a warning 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 Institute’s receipt of the appeal. The decision of the Administration, in collaboration with faculty, is final. All students who continue on probationary status will have a written academic plan that outlines the standards that must be met to be removed from probation.

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 and 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 as long as he or she meets the terms of the academic plan approved at the time the student’s appeal was granted, until such time as 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.
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 RISI is incorporated) and Colorado (where RISI 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, RISI 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, RISI 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.

4.2 State Authorization

State Licensure by the CO Division of Private Occupational Schools
The Rolf Institute of Structural Integration 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
Only the Basic Rolfing Certification Program (731 clock hours) is accredited through The Commission on Massage Therapy Accreditation (COMTA). As of January 2017, the Post-Graduate
Basic Rolfing Certification Program (600 clock hours) will no longer be accredited, but rather will be offered in unaccredited regional workshops. In order for a student to graduate with certification in Rolfing Structural Integration, the student must complete the entire program of three phases and must attended 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 Institute was found eligible and approved to participate in the following Title IV, HEA programs:

- Federal Direct Student Loan Program, 20 U.S.C. 1087a et seq.; 34 C.F.R. Part 685
- Iraq and Afghanistan Service Grant, 20 U.S.C. 1070d etc seq.

Updating PPA Application Information
The Financial Aid Office will notify the Department of Education of any changes that take place at Rolf Institute in regards to 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 contende, 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 limitations 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 Rolf Institute of Structural Integration 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 RISI, 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 the Student Status Confirmation Report (SSCR) accurately and completely on current students and returning the SSCR 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 SSCR 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. RISI uses this information to improve its default prevention.

4.6 Admission Policy for Private Nonprofit Educational Institution: Postsecondary
(See 34 CFR 600.4(a)(2); 34 CFR 600.5 (A)(2); 34 CFR 600.6(a)(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
RISI 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 a 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 34 CFR 600.7(a)(a)(IV) and HEA 484 (d)(3); 34 CFT 66.32(e) and DCL; GEN-02-11 and GEN 08-12)

To be eligible for FSA funds, students who are beyond the age of compulsory attendance but who do not have a high school diploma, or its recognized equivalent, must meet ability-to-benefit criteria or meet the student eligibility requirements for a student who is home-schooled. The
Department considers that a home-schooled student is beyond the age of compulsory school attendance if the state, in which the eligible institution is located, does not consider the student truant once he or she has completed a home school program. Students may self-certify that he or she completed secondary school in a home school setting.
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. RISI 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 Student Right-to-Know Act, information on Graduation, Completion, and Transfer-Out Rates (rates on Athletes is non-applicable at RISI);
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 supplied, 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 and Student Services and the Registrar will be available during normal operating hours to help persons obtain consumer information. Each student receiving financial aid shall receive a copy of the Department of Education publication, The Student Guide. This document may also be found at www.ifap.ed.gov.

5.3 Completion of Gradation 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 RISI, 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 Faculty and Student Services will determine the cohort based on the description above.

**Step 2: Calculating the Rates**
Once the Director of Faculty and Student Services 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 of the students in the cohort.

The following formula is used to calculate a completion rate for the general student body cohort:

\[
\text{Completion Rate} = \frac{\text{Number of students in cohort who completed their program within 150% of normal time for completion}}{\text{Number of students in cohort}}
\]

**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 Post-Graduate 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 it completion calculations. The report must be completed and submitted to the Department by the GRS deadline. RISI will disseminate the information on completion or graduation to enroll and 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, RISI 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

RISI 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)

RISI 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 the purpose of paying school charges. To be considered a scholarship, a grant must actually 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 particular 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 current employees directly by publications and mailings, including direct mailing to each individual through the U.S. Postal Service, campus mail, or electronic mail. If RISI chooses to fulfill this requirement by posting the crime report on the RISI 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, RISI will provide its annual campus security report to a prospective student or prospective employee.
RISI 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.

5.7 Timely Warnings and Emergency Notifications
(See 34 CFR 668.46(e))

In addition to the required annual campus security report, RISI 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 34CRF 668.46) f))

RISI 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 RISI 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 final 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 in reference to that crime the institution might disclose the results of the proceedings, regardless of whether the institution concluded that a violation was committed.
Section 6: General Provisions

6.1 Academic Year
The Academic Year at RISI 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 RISI Federal Student Aid Award Year is defined as January 1 to December 31st 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 Post-Graduate 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 month scheduled break. Between Phases I and II, Basic students, not in the Post-Graduate program, are required to complete 50 hours of Skillful Touch and to 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 (typically the Ten Series can take two to three months for completion.) The scheduled breaks ensure that students allow their own nervous systems and bodies to regulate, as well as provide the additional practice time needed for the student to apply and practice the touch skills and integrated Ten Series they are learning during instructional hours.

Clock-Hour Program
A program of at least one academic year in duration that leads to a certificate or other non-degree 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 several programs of study that require clock-hour conversion to be eligible for federal student aid. The Basic and Post-Graduate programs are both certificate programs offered at our institution that require 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 = 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 at the ten-percent point of the class. The Admission’s Office is responsible for this information. Students who receive more than three absences for a program are not eligible for financial aid.

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 RISI Education Catalog
2. The RISI website at www.rolf.org

Students have the right to know the:

1. Financial aid programs available
2. Application process which must be followed to be considered for aid
3. Criteria used to select recipients and calculate need
4. RISI refund policy and repayment policy
5. Financial Aid Office policies surrounding satisfactory academic progress
6. 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 the student must fully understand. In order for funds to disburse students must first complete certain entrance requirements that show they have reviewed your obligations as a loan borrower.

Federal Stafford Loans

Students who are first time borrowers of Federal Direct Stafford Loans are required to complete a one-time Entrance Counseling session and Master Promissory Note (MPN) online at www.studentloans.gov. Each student is given instruction on how to complete the on line Entrance Counseling sessions as follows:

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

Step 1: Direct Loan Entrance Counseling
The Direct Loan Entrance 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 [www.studentloans.gov](http://www.studentloans.gov).

1. Under **Manage My Direct Loan** click the green “Sign In” tab.
2. Sign in using your personal information and your (student) FAFSA PIN number.
3. Click **Complete Counseling**.
4. Under **Entrance Counseling**, select “Start”.
5. Under **Add School to Notify**, select Massachusetts for School State, then Merrimack College as your School Name. Click Add School.
6. Under **Select Student Type**, select undergraduate or graduate, depending on your program of study and Continue.

Read the information and complete the questions at the end of every page. Once you have completed the Entrance Counseling, print a copy for your records.

### Step 2: 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 [www.studentloans.gov](http://www.studentloans.gov).

1. Under **Manage My Direct Loan** click the green “Sign In” tab.
2. Sign in using your personal information and your (student) FAFSA PIN number.
3. Click **Complete Master Promissory Note**.
4. Click **Subsidized/Unsubsidized** and begin.
5. Select Massachusetts under School State, then Merrimack College as your School Name.

You will need the name and addresses of two (2) references. One reference may be a parent. Once you have completed the MPN, print a copy for your records.

**Please keep the following in mind:**

Each session will take approximately 30 minutes to complete. If you are logged in longer than 30 minutes, the system will time you out and will not save your progress.

You will need your Federal Personal Identification Number (PIN). This PIN was assigned to you when you completed your Free Application for Federal Student Aid (FAFSA). If you do not have this PIN, you may request it at [http://www.pin.ed.gov](http://www.pin.ed.gov). Once you have completed both requirements, it will take approximately 24-48 hours for us to receive the results electronically.

### Exit Counseling Requirements

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. Exit Counseling is mandatory for specific types of federal and state funded loans.

**Federal Direct Stafford Loan**

If you borrowed a Federal Direct Stafford Loan, please visit [www.studentloans.gov](http://www.studentloans.gov) click on “Exit Counseling” and then “Start” under Loan Exit Counseling to complete the requirement.

**Federal Perkins Loan**

If you borrowed a Federal Perkins Loan, you must visit the Office of Financial Aid in person to complete Exit Counseling. Please bring 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** for this type of loan and must be completed before you graduate. If you have borrowed a Perkins Loan, your cap & gown and diploma will be held until the Exit Counseling requirement is met.

**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 Gemcor’s web TEAM Application.

The allowance for room and board, personal expenses, and transportation will be calculated by the TEAM system based on the length of a student’s award/loan period, and the monthly allowances identified below. RISI 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 RISI’s discretion, any individual student’s Cost of Attendance may be modified when packaging the award.

**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**  
(See Gemcor COA Policy)

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 of time 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. This may seem odd, but 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 greater 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 = $11,994 ($9,995 x 900 / 731)

Multiplying the total program tuition and fee amount by the following fraction always prorates Tuition & Fees.

**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 amount 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.

**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 of time 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 standard length.**

*Example:*
Academic Year (at least 900 clock hours and 26 weeks)
Program Length = 900 Clock Hours

**The program is non-standard, less than the standard 900 clock-hour academic year.**

*Example:*
Academic Year (at least 900 clock hours and 26 weeks)
Program Length = 750 Clock Hours

In these cases, the loan period includes 750 clock hours and the calendar time it will take for the student to complete the entire program.

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.

**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 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 of time.
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 considered to be 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.

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. Generally speaking, the budget is actually based on whether or not 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 (one for students living with parents and one for those on their own)
- Two loan costs of attendance for part-time students (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 a number of 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

<table>
<thead>
<tr>
<th>Expense</th>
<th>One Person</th>
<th>Two Persons</th>
<th>Three Persons</th>
<th>Four Persons</th>
</tr>
</thead>
<tbody>
<tr>
<td>Food</td>
<td>$315</td>
<td>$588</td>
<td>$660</td>
<td>$821</td>
</tr>
<tr>
<td>Housekeeping supplies</td>
<td>$32</td>
<td>$66</td>
<td>$65</td>
<td>$78</td>
</tr>
<tr>
<td>Apparel &amp; services</td>
<td>$88</td>
<td>$162</td>
<td>$209</td>
<td>$244</td>
</tr>
<tr>
<td>Personal care products &amp; services</td>
<td>$34</td>
<td>$61</td>
<td>$64</td>
<td>$70</td>
</tr>
<tr>
<td>Miscellaneous</td>
<td>$116</td>
<td>$215</td>
<td>$251</td>
<td>$300</td>
</tr>
<tr>
<td>Total</td>
<td>$585</td>
<td>$1,092</td>
<td>$1,249</td>
<td>$1,513</td>
</tr>
</tbody>
</table>

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 have a financial need
2. Be a citizen or an eligible non-citizen
3. Be enrolled in an eligible program of study
4. 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. 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 non-immigrants 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.

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.studentloans.gov. Although the web address identifies the sites at “Student Loans” it is actually more of a homepage for students to control their federal ID. From this site, students can file FAFSA applications necessary for any type of federal aid, complete electronic master promissory notes (E-MPNs), access loan counseling necessary for federal student loans, and also 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 recommended 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 Gemcor electronically. The ISIR is the core document necessary to begin the financial aid award process. ISIRs are uploaded into the TEAM System on a daily basis, along with confirmations from the USDE regarding completed E-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 RISI 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 Gemcor, Inc. web-based Title IV Electronic Awards Management (TEAM) Software System.

The FASFA is available in paper and electronic formats. A paper version is available by calling 1-800-4-FED-AID.

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 staff members in the Financial Aid Office 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) come from the information the student provides on the FAFSA. The CPS analyzes the information from the FAFSA and calculates the EFC. The school determines the student’s eligibility on the basis of the Expected Family Contribution. EFC 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. RISI and Gemcor, along with the Department of Education determine the amount of the student’s PELL Grant award on the basis of 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. In the event that RISI 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.

Gemcor, Inc will review SAR and ISIR files submitted to determine accuracy with verification or “C” code resolution documents. Although allowed by some regulations, Gemcor and RISI 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 be returned to RISI and to the student for 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 “C” code occurs whenever the letter appears next to the EFC number on the SAR or ISIR. Generally, “C” codes indicate that there was a mismatch of applicant information with one of several other federal agencies:

- Social Security Administration (SSA)
- Department of Homeland Security (DHS)
- Selective Service System
- National Student Loan Data System (NSLDS)
- Department of Health and Human Services (HHS)
- Department of Defense (DoD)
- Department of Justice (DOJ) via ED Hold File

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. Since “C” codes are relatively rare, the Director of Financial Aid should feel free to contact Gemcor for personal guidance when there is a file with a “C” code. 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).

All SAR/ISIR files received by Gemcor go through a compliance edit before any awards are processed. Files that are deemed to be inaccurate or incomplete will be rejected and returned unprocessed. Accepted files are sent to the Gemcor Processing Department where awards are originated with the Department of Education. Prior to issuing payments to RISI for students, Gemcor 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 RISI 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. Since Gemcor’s system will not issue any award payments to students without an accepted disbursement record, RISI may be unable to process a particular payment if the Department responds to the disbursement record that a payment may not be made due to another institution receiving those funds. In these cases the Institute will receive a separate notice from Gemcor, Inc. indicating what institution previously processed aid for the student, and what actions need to be taken to resolve any conflict.
8.7 Verification
(See 34 CRF 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 “*”. Specific policies, procedures, and forms needed to complete the verification process are included in the Gemcor, Inc. site www.gemcorinc.com.

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

1. Household size
2. Number in college
3. Adjusted Gross Income (AGI)
4. U.S. taxes paid
5. High School completion status
6. Identity/Statement of Educational Purpose
7. Certain type of untaxed income and benefits
   - Child support received or paid
   - 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 work with Gemcor, Inc. to 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.

8.8 Payment Periods

Because RISI 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 upon completion of the instructional clock hours in the student’s previous pay period and at least half of all of the clock hours 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 31st of the next year. If the majority 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 a particular award year, RISI will need to send the following information to Gemcor, Inc. (These procedures apply unless RISI’s Director of Financial Aid submits electronic payment requests through TEAM Software.)

1. Complete Formula Sheet
2. Student Aid Report (SAR) and ISIR (if applicable)
3. Complete Verification material (if applicable)
4. “C” Code Resolution Documentation (if applicable)

**Formula Sheet**
The Formula Sheet is an internal form designed by Gemcor, which provides their office with basic information necessary to process a student’s annual Pell & Campus based awards. Master copies of this form can be found in Appendix A of this manual. RISI will use the Formula Sheet for clock-hour programs. RISI may also originate student awards electronically through the Gemcor, TEAM Software System.

The Program ID is a code used to identify each academic program at RISI. Program lengths and academic calendar are stored in the Gemcor system for ease and speed in processing.

If Gemcor generates RISI ISIRs, then the office of Financial Aid is not required to resubmit the physical ISIR to Gemcor for processing. RISI may simply indicate the appropriate Student ID number from the ISIR on the Formula Sheet and return only that document to Gemcor for processing. The Formula Sheet may be faxed to Gemcor, Inc. for convenience. It should be noted that using this approach to award processing does not result in a physical review of the ISIR file by Gemcor, Inc. This process should be used only if the ISIR is not flagged for verification or “C” code resolution, or if RISI has already deemed that verification and “C” code resolution documents are accurate.

There are two boxes in the center of the Formula Sheet, which contain important information necessary to accurately process student awards. The Program Information area includes constant information about RISI program’s and academic year’s length. This information will remain constant for all students in a particular program.

The Cost of Attendance section may change for a student within a program but should generally be based on standard budgets determined by the Institute. RISI will develop and consistently use standardized cost of attendance budgets. The budgets should reasonably reflect a student’s total cost for attending the Institute including estimated living costs.

**Subsequent Payment Requests**
The Gemcor, Inc. system will automatically schedule future payments to a student at the time the first payment on a SAR or ISIR is processed. The schedule shall coincide with the remaining payment periods in the RISI academic year. When students reach a subsequent payment period,
and RISI has determined that the students have maintained satisfactory progress in accordance with published standards, RISI will indicate the students on the Gemcor “Subsequent Payment Request Form.” Multiple students may be listed on each form. Upon receipt of this form, Gemcor will process the student’s next payment. Gemcor does not automatically process future payments based on scheduled dates. RISI must notify Gemcor that a student has completed all requirements of the prior payment period before future payments are generated. This policy avoids unlawful prepayment to students, as well as controls maintenance of excess federal cash in the RISI federal student aid bank account. Gemcor’s TEAM software users may request subsequent payments through the software’s electronic process.

To expedite the processing of subsequent payments RISI Financial Aid Officers may also fax the “Subsequent Payment Request” form to Gemcor at 1-888-8-GEMCOR. Note that the above procedures for requesting subsequent payments pertain to additional payments on one particular year’s ISIR. If a student will be receiving awards on different years’ ISIRs, RISI must follow the procedure outlined for first payment on a particular SAR or ISIR.

**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 make adjustments to 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, RISI may make adjustments to 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 RISI 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.

RISI students who want to be considered for a professional judgment are required to complete the Special Circumstance Application 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 Gemcor, Inc. 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.

RISI’s Financial Aid Office, in collaboration with Gemcor, can submit the student’s corrections as long as RISI 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 Special Circumstance Application is included in the Appendix A.
Section 10: Disbursing Funds

10.1 GAPS/G5 Federal Fund Draw downs
Federal funds necessary to cover awards accepted by COD each day are electronically deposited into the RISI federal funds bank account. Gemcor 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). Each day Gemcor, Inc. reviews RISI’s account to determine if additional funds are needed for deposit into the account to cover that day’s award journal.

10.2 Federal Cash Management Policy
(See Gemcor Client Manual, Section 8.1)

1. Each day, after Title IV awards are processed, 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.

2. 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.

3. 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 through the Grants Administration and Payment System (GAPS).

4. 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
(See Gemcor Client Manual)

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 a 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. Whether or not notification is given, or whether or not 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 RISI SAP Policy – Satisfactory Academic Progress – Academic and Financial Aid.

11.4 Definition of Attendance
All students must demonstrate a satisfactory amount of participation in order 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” in order to be considered participating. This may include any or all of the following as defined by the course syllabus or student handbook/policies:

1. Class attendance (including attending for the majority 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 5 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

RISI 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 RISI 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 RISI 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 RISI’s Refund and Return of Title IV Funds policy must be performed and any resulting refunds must be repaid by RISI. For Title IV recipients, a Return of Unearned Title IV (R2T4) funds calculation must be performed before an institutional refund calculation. 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: to unsubsidized, then subsidized FDSL Programs, the Federal Pell Grant Program.

For Title IV, RISI must notify Gemcor immediately when making Pell or FDSL refunds. Gemcor will record the refund, account for the additional cash in the RISI federal aid account, and reduce the student’s expected disbursement in the government’s computer system. Forms for the Return to Title IV (R2T4) are included in Appendix A of this manual.

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. In order 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 days* attended in the payment period is divided by the total days* in the payment period.
   *Days = calendar days for purposes of this formula, and therefore include weekends and holidays. Only scheduled breaks of five days or more and approved leaves of absence are excluded.
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 actually 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
Cancellation for RISI 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 RISI 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 forty-five (45) days of such action. The failure of a student to notify the Director of Faculty and Student Services or the Registrar in writing of withdrawal may delay refund of tuition due pursuant to Section 5001 and 5002 of the Education Law.

1. A student who has not signed the RISI Enrollment Agreement or has not been accepted to the program may cancel at no penalty.
2. A student may cancel his or her RISI 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 RISI Enrollment Agreement, students are responsible for the 50% of the initial Program Deposit and the Application Fee, provided the student has not entered into instruction. The date the student states he/she is not attending will be the date of non-start of the program.
4. If the student withdraws or is discontinued after instruction has begun, the school may retain not more than: the Application Fee, the full Program Deposit and any tuition and fee liability as of the student’s last date of physical attendance.

Tuition and fee liability is divided by the number of days in the program. Total tuition liability is limited to the Phase during which the student withdrew or was terminated.

For the Rolfing Certification programs, total tuition and fee liability is:
- a) 10% of the term's tuition and fees if the termination is during the first 10% of instruction; or
- b) 25% of the term's tuition and fees if the termination is between 10-25% of instruction; or
- c) 50% of the term's tuition and fees if the termination is between 25-50% of instruction; or
- d) 75% of the term's tuition and fees if the termination is between 50-75% of instruction; or
- e) 0% of the term's tuition if the termination occurs thereafter.

For students with Title IV, Withdraw Before 60%
The institution must perform a 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 hour, 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 a R2T4 to determine the amount of aid that the student has earned.

**Calculation Formula**
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.

   \[
   \text{HOURS SCHEDULED TO COMPLETE}/\text{TOTAL HOURS IN THE PAYMENT PERIOD} = \% \text{ EARNED}
   \]
   (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%, proceed 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**
RISI 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.
An overpayment of financial aid occurs anytime the student receives a payment that is greater than the amount for which the student is eligible. Examples of the four most common types of overpayments are given below:

1. Student error, such as failing to report the spouse's income on an 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 does not begin attending all of his or her classes, 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, RISI 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 Gemcor Client Manual and 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 in order 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 a over award from a previous award year.

If a student repays a Pell overpayment for a prior award year, RISI must deposit the funds in the RISI institutional federal fund account and report the decrease in the student’s award to Gemcor and to the Federal Pell Grant Program. The funds can then be used for current year disbursements. At the same time you report the decrease to the Federal Pell Grant Program, Gemcor will report the decrease to the total Pell expenditures for the prior award year on the Federal Cash Transaction Report (ED/PMS 272A)

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.
Section 13: Federal Pell Grant Program
(See 34 CFR 690.63)
Section 14: Federal Direct Loan Program
(See Gemcor Client Manual, Section 4 ff)

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. RISI offers the Stafford program.

Stafford loans are available to student's borrowers and are further split into unsubsidized and unsubsidized 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.

Virtually all client schools that participate in the FDSL program use GEMCOR to process their student loan applications. Gemcor 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 RISI Basic Rolfing 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 full 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 30th 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 (Prom 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 prom note used in today's financial aid arena. Using a 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 prom notes can be obtained from Gemcor or directly 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 E-MPN website [www.studentloans.gov](http://www.studentloans.gov). Filing an E-MPN eliminates even more of the paper that was previously associated with student loan funding. Using the E-MPN process is the preferred method of executing promissory notes for student loans.

**Disbursing Loan Funds**

RISI receives processed loan awards similar to the way 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 RISI receives and will apply to a student’s account at RISI. RISI 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 RISI Award package will be sent out by email in writing and will include an full explanation of the award, including the type of award i.e., 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 RISI, some of the loan money received by the borrower was unearned. After determining how much loan money is unearned, RISI will return these funds in the same manner as unearned Pell Funds. Simply deposit the unearned amounts back into the RISI federal bank account and notify Gemcor about this return of funds. Gemcor will then adjust the borrower’s account with the Department of Education and either use the returned funds on hand for a future borrower, or return them to the Department of Education electronically.
**NSLDS Enrollment Reporting (Student Status Confirmation)**
Periodically RISI must update student enrollment information into the federal NSLDS database. NSLDS Enrollment Reporting is typically done online using the student’s NSLDS 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, RISI will need to correct any inaccurate enrollment statuses or dates in the online system. This process will repeat about every two months. It is crucial that RISI not delay in updating students’ records. There is only a small window of opportunity to complete this process on time. Gemcor support staff is available at any time to assist.

**FDSL First Payment Requests**
A first payment of a Stafford loan is accomplished by submitting the loan request to the Gemcor office for loan origination in hardcopy format as described here or electronically through the Team system. For each new student loan RISI will need to submit the following: (Note that if the student has used the electronic MPN process, a paper MPN will not be required.)

- A completed and Signed Promissory Note for New Borrowers
- Completed Certification Worksheet
- SAR or ISIR (if not already on file with Gemcor)
- Verification Material (if selected, and not already on file with Gemcor)
- “C” Code Resolution Material (if selected, and not already on file with Gemcor)

**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. A fully completed worksheet must accompany each loan file. Team Software users can submit loan requests through the Team Software System.

This worksheet must be completed and provides Gemcor with the necessary information to correctly originate student loans. This form is self-explanatory in most respects and can be found in Appendix 5 of the *Gemcor Client Manual*. 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 RISI. 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 RISI, that does NOT put the student into grade level “3”.

### Question 2 – Loan Period
The loan period should coincide with the length of RISI’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 731 clock-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).

Upon receipt of a complete loan file from RISI, Gemcor will electronically originate the student’s loan with the USDE. Gemcor will also submit the signed promissory note to USDE, if the electronic MPN process was not used. When the USDE has received the promissory note (either from Gemcor or the student), they will electronically acknowledge that fact with Gemcor, and then Gemcor will be able to begin disbursing the loan. First payments are generally made no sooner than 30 days into a student’s first loan period.

FDSL Subsequent Payment Requests

Gemcor office will generate subsequent payments only after RISI has confirmed that the student has begun a new payment period. As with the Pell Grant program, this can easily be accomplished by submitting the student's information on the Subsequent Payment Request Form found in Appendix 4 of the Gemcor Client Manual, and Appendix A of this manual.

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 "*". Specific policies, procedures, and forms needed to complete the verification process are found in Appendix 3 of the Gemcor Client Manual, or Appendix B of this manual or on the Gemcor website at www.gemcorinc.com.
Section 15: Veteran Affairs

The Director of Financial Aid, in collaboration with the Director of Faculty and Student Services, 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 RISIs’ 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 (usually in March).

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. 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.

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 RISI Veteran Contract and gives each potential student a VA package. The VA package lists Frequently Asked Questions for VA, RISI regulations, general financial aid regulations and the Satisfactory Academic Progress Policy.

RISI Required Documents
  a) Copy of Certificate of Eligibility (COE)
  b) Copy and forward a copy of all CH 33 COE’s ACTTWO Business Office
  c) Copy of DD-214 (member 4) or National Guard form DD2384 (NOBE)

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 RISI 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 RISI 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
Section 16: 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 and Student Services and/or the Executive Director for possible disciplinary action.

The Director of Faculty and 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.